



Kingdom of the Netherlands

**CHALLENGES OF ALBANIA'S APPROACH
TO EFFECTIVELY TACKLE ORGANISED CRIME
DEVELOPING A MORE EFFICIENT AND IMPROVED
LEGAL FRAMEWORK IN ALIGNING WITH
EU APPROACH**

Policy Paper





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Kingdom of the Netherlands

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Abbreviations

EC	European Commission
EMPACT	European Multidisciplinary Platform Against Criminal Threats
EU	European Union
EUCPN	European Crime Prevention Network
EUROPOL	European Union Agency for Law Enforcement Cooperation
FATF	Financial Action Task Force
GMIP	Group for Integrated Policy Management
IGKO	Global Organized Crime Index
IPSIS	Integrated Planning System Management Information System
ISCOC	Intersectoral Strategy for Combatting Organized Crime, Illicit Trafficking and Terrorism
LBS	Legal Business Structures
NBI	National Bureau of Investigation
OC	Organized Crime
OFL	Operation “Power of Law”
PESTLE	Factors (Political, Economic, Social, Technological, Legal and Environmental)
PVT	Potential Victims of Trafficking
SIENA	Secure Information Exchange Network Application
SOCSC	Strategy against Organized Crime and Serious Crime
SOCTA	Serious Organized Crime Threat Assessment
SPAK	Special Structure against Corruption and Organized Crime
UNODC	United Nations Office on Drugs and Crime
VT	Victims of Trafficking

Executive Summary

Organized crime has been one of Albania's challenges over the past two decades, affecting several aspects of society. The development, sophistication and trends of organized crime have caused an increase in the volume of criminal activities as well as new developments in organizational structure and modus operandi.

As an EU candidate country expecting to start the accession negotiations to become a full member, the fight against organized crime continues and will remain one of the key indicators for Albania's progress for EU integration.

However, it is important to note that despite efforts in this direction, assessments related to Albania's results in the fight against organized crime are still weak, and overall the fight against organized crime needs to be further strengthened. This is also highlighted in the European Commission Reports for Albania during the last 4 years (2018-2021) in which the level of preparation of Albania in the fight against organized crime has remained the same levels (*some level of preparation*).

Albania began to adopt a strategic approach to fighting organized crime about 12 years ago in 2000s, with the adoption of a series of strategies aimed at tackling various forms of trafficking, improving governance systems and combating corruption. The first Intersectoral Strategy on Combating Organized Crime, Trafficking and Terrorism was adopted in 2018 and soon after its expiration, the Albanian government adopted the Intersectoral Strategy for Combating Organized Crime, Illicit Trafficking and Terrorism 2013-2020 and the Action Plan for the years 2013-2016. At the end of 2020 it was adopted the new Strategy against Organized Crime and Serious Crime, 2021-2025 and the action plan 2021-2022.

Despite the strategic framework and various legal acts that Albania has adopted and implemented in the framework of the fight against organized crime, it can be noted that a well-defined approach to address organized crime has been lacking. This has resulted because of the shortcomings to conduct systematic and comprehensive assessments based on a well-defined methodology, and in order to reflect concrete objectives and indicators in accordance with the identified principles.

Being a serious threat even for European countries themselves, European Union policies in the fight against organized crime have focused on using a range of approaches including preventive and disruption, which have integrated strengthening law enforcement and criminal justice. What remains crucial and important in these approaches is to conduct analyses and assessments in order to

identify threats and priorities in order to develop objectives, activities and measures that respond to the current challenges posed by organized crime.

In this context, Albania also needs to address well-defined approaches, which provide a combination of the principles of prevention, protection, suppression and awareness raising, in order to effectively tackle against organized crime activities. It is also important that these processes must be multidisciplinary and inclusive, building on a framework for informed public discussion and consultation, and continuously and consistently involving social actors and stakeholders, by improving public debate on policies and approaches against organized crime.

Introduction

The development of organised crime along the deep economic and social transition of Albania, and the lack of experience and capacities to adequately deal with it, has allowed organised crime (OC) to creepingly become entwined into the social fabric of Albanian's post-communist society, ensuring thus a certain level of tolerance.

Often individuals with organised crime links have emerged as businessmen or even politicians to communities, blurring the lines between the legitimate and illegal boundaries and making even more present the presence of this phenomenon in the Albanian society.

In any context, the presence or lack thereof of organised crime is related to the combination of political, economic, societal, environmental, and legal factors. Each of these factors has had its share in the emergence and development of organised crime in Albania and worldwide.

The poor economic situation and lack of sustainable economic infrastructure providing employment induced hundreds of thousands of Albanians to migrate to Europe and beyond, in search for better work and living conditions. Many found their way into crime in these countries and this trend has continued as the migration trend continues to be comparatively high among Albanians even presently.

With the increasing structuring of organised crime activities, many Albanian citizens have been involved in the recent years in the cultivation of cannabis, expanding the footprint of the activities.

On the other side, the underdeveloped economy has allowed organised crime to easily inject their finances into some of the most important economic sectors. The need for investments remains an enabling factor and so the risk from organised crime finances to make its way into the legal economy.

The polarised political context and the strong competition for power among the political contenders have been and remain one of the vulnerabilities through which organized crime has exerted their influence into the country's politics. The party financing and need for support in electoral processes remain vulnerabilities that will create opportunities for organised crime to influence politics.

The justice system reform approved in 2016 and the establishment of new justice bodies, specifically the Special Structure against Corruption and Organized Crime and the Special Courts for Corruption and Organized Crime was considered an important step in the fight against organized crime and particularly in breaking the links

between organized crime and key actors from public institutions, judiciary and politics.

Nevertheless, given all the dynamics of Albanian organized crime over the years in Albania and abroad, as well as its characteristics, it is important to note that the fight against organized crime requires a more detailed assessment and analysis in order to design and adopt policies, approaches and other measures that effectively address the relevant challenges posed by Albanian organized crime groups operating in Albania and abroad.

Methodology

The methodology developed in the framework of this policy paper is based on conducting an analysis, which is focused on two main levels.

- *The first level of analysis* focuses on addressing the European Union's approach to the fight against organized crime, highlighting and reflecting the steps and measures taken in this regard by focusing in their effectiveness against the recognized needs.
- *The second level of analysis* focuses on addressing the approach that Albania has adopted in the fight against organized crime, especially after the 1990s. This analysis aims to identify and assess the shortcomings encountered in the way of developing this approach, in order to generate recommendations as opposed to the initiatives and measures taken at the level of the European Union.

Based on the followed methodology and the conducted analysis, this policy paper is composed by four main chapters.

Chapter I: presents a general overview of the main trends of organized crime in Albania, the main features of Albanian organized crime groups operating inside Albania and abroad, as well as the main criminal activities undertaken by these groups.

Chapter II: presents some of the main international assessments regarding Albanian organized crime. These evaluations/analyses reflect some important elements related to the level and extent of organized crime, as well as assessments related to the effectiveness of the results achieved in the fight against organized crime.

Chapter III: describes the steps and measures that the European Union has adopted in the fight against organized crime in recent years, considering it as one of the most serious threats facing to. By describing these measures, this chapter aims to assess the EU's approach in the fight against organized crime.

Chapter IV: addresses the approach followed by Albania in the fight against organized crime by focusing on its strategic framework. This chapter aims to highlight some of the shortcomings evidenced by the implementation of this approach by also comparing it to the measures taken by the European Union. This comparative analysis

was conducted to stress the need that Albania has for developing and adapting a more effective response against organized crime.

The methodology used refers to the official data/statistics of various law enforcement institutions in Albania, as well as the reports of international institutions. In addition to these data, information and other secondary data from external sources were also used.

I. Organized Crime: Relevance and Trends

Organised crime remains one of the most important threats to Albania's security and economic development in the near future. A significant proportion of organized crime groups are involved in the country's **legitimate economy** making activities such as money laundering or trafficking of high excise goods and counterfeit products gain relevance.

Also, more and more organized crime groups are using **technology** to evade investigations, as well as planning and conducting their own operations, which have become more diverse, but also more difficult to be detected.

The **transnational extent** of organized crime has also made the division between organized crime activities carried out under Albanian jurisdiction and those carried out within the jurisdiction of the EU area becoming less and less distinct.

The **development, sophistication and trends** of organized crime have brought about an increase in the volume of criminal activities as well as new developments of organizational structuring and *modus operandi*.

Corruption and its influence in public sector

The level of corruption and the influence of the organized crime in the public sector involve the abuse of the power entrusted to the public sector, practicing illegal influence, exploiting weaknesses, bribing, blackmailing to further criminal activity. The **presence of corruption**, as a key feature of the transition economies has been one of the keys enabling factors that has created a **favourable ecosystem** for organized crime.

More active measures used by organized crime groups has been the **infiltration of government systems through recruitment in political and administrative functions**. The adoption of the Law on Decriminalisation in 2015 is aimed at reversing this trend by removing public officials with criminal records from parliament and state institutions.¹

Similarly, the processes of vetting of judges and prosecutors,² and police officers,³ which includes the screening of the respective officials on improper connections with

¹ Law No. 138/2015 "On ensuring the integrity of persons elected, appointed, or holding public functions"

² Law No.84/2016 "On the Transitional Re-evaluation of Judges and Prosecutors in the Republic of Albania"

³ Law No. 12/2018 dated 5.3.2018 "On the transitional and periodic re-evaluation of state police, guard of the Republic of Albania and Service for Internal Affairs and Complaints at the Ministry of Interior".

organised crime was undertaken in response to the organized crime increased influence on the judiciary.

The establishment of **Special Investigation Bureau (NBI), Special Prosecution (SPAK) and Special Courts** to fight organised crime and corruption have come as a response to counter and reverse such high level of penetration. In addition to corruption and provision of financial support to electoral processes organized crime groups have been reported to also blackmail politicians with compromising evidences.⁴

Use of Legal Business Structures

Operating within the legal economy through the acquisition of assets has been one of the basic features of OC which in the conditions of Albania's deep economic transition appeared innocuous. As organized crime groups grew more powerful economically by earning important sums from the illegal markets, the **infiltration of the legal economy** through investments to launder the money and to create legitimate business structures for further illegal activities has been prevalent.⁵

Currently, the presence of organized crime groups is noted in lucrative industries such as real estate, tourism, construction etc.⁶

Albanian organized crime groups have increasingly become active in the establishment of **businesses that are used as front to launder money**, cover further illegal activities or both. Also, there is evidence of Albanian organized crime groups making profit through their companies by accessing **public funds through tender procedures**.

The Law on Public Procurement has been recently amended to prevent organized crime from accessing public funds through the introduction of exclusion criteria for candidates and bidders linked with OC activities.⁷

Business sectors such as banking, real estate, accounting, gambling, money value transfer services have been considered as sectors with evidence of organized crime investments in Albania by Council of Europe Moneyval.⁸

⁴ Global Initiative Against Transnational Organized Crime “Hotspots of organized crime in the Western Balkans: Local vulnerabilities in a regional context”, May 2019. <https://globalinitiative.net/wp-content/uploads/2019/05/Hotspots-Report-English-13Jun1110-Web.pdf>

⁵ Fabian Zhilla, Besfort Lamallari; “Evolution of the Albanian organized crime groups”, OSFA 2016: http://www.osfa.al/sites/default/files/evolution_of_the_albanian_organized_crime_groups.pdf

⁶ State Intelligence Service, Public Report, 2019. <https://www.shish.gov.al/files/Raporti%20publik.pdf>

⁷ Article 45, Law Nr. 9643/2006 “On Public Procurement”, as amended

⁸ Anti-money laundering and counter-terrorist financing measures: Albania, Fifth Round Mutual Evaluation Report. Moneyval (2018)7. <https://rm.coe.int/committee-of-experts-on-the-evaluation-of-anti-money-laundering-measur/16808ff138>

Adaptability and flexibility

Adaptability is one of the main characteristics of the organized crime groups, related to the ability to adapt criminal activities or working processes to changes in the environment to exploit legal and illegal markets, innovation and proactiveness.

The **adaptation process** has affected structure, activities, and modus operandi. The ability of the organized crime groups to adapt poses a high-level threat. This characteristic of organized crime was also evident throughout the Covid-19 pandemic. Despite the restrictions imposed, criminal groups not only reorganized and adapted the way their activities operated, but at the same time took advantage of new opportunities arising as a result of the global health crisis.⁹

Creating a separate business model, in line with the needs and market dynamics, is also one of the features of organized crime groups.

Expertise

Albanian organized crime groups have been very adaptable, combining **expertise and profitability** to achieve their objectives and to advance in the competition markets.

Albania's position in the Balkan route of drugs' shipment into Western countries, has contributed to developing organized crime groups expertise in concealment of drugs, development of transportation capabilities and networking.

Albanian organized crime groups have developed **capabilities and planning** that to mount complex operations, while in addition to the expertise developed to conduct illegal activities, organized crime groups have also developed **expertise to protecting their activities from law enforcement and competitors**.

The development of technologies and their ability to purchase expertise has allowed organized crime groups to use **various technological solutions** to protect premises, but also to control the movements of law enforcement. Organized crime groups use their resources to hire skilled professionals, such as lawyers and economists to take care of their affairs.

⁹ EUROPOL, EU Serious and Organised Crime Threat Assessment 2021:
https://www.europol.europa.eu/cms/sites/default/files/documents/socta2021_1.pdf

Effects of Organised Crime

Through its presence organised crime has produced multiple negative effects in the society, economy and political processes.

One of the most adverse effects, if not the most harmful, resulting from the organised crime activities, is the **physical and psychological harm** caused to many individuals trafficked and forced into prostitution or/and forced labour and the victims of use of drugs.

Another negative effect is the **infiltration of the licit economy** which has damaged free competition, the engine of the market economy, and increased the costs of business, and harmed the overall business climate.

Additional negative effects include **corruption** of administrative and criminal justice systems and the slowdown of the EU integration process. Through their increased presence in the economic and societal levels, the organized crime groups have put under pressure the **systems of economic governance and enforcement of rule of law**, forcing the country to undertake costly reforms, including the justice sector one.

Being set as one of the key priorities to be met in order for Albania to make progress in the accession process, the fight against organised crime has consumed valuable **time and resources** that could be dedicated to other fronts and harmed country's international reputation.

II. Albania's Preparation Level to Address Organized Crime

As an EU candidate country expecting to start the accession negotiations to become a full member, the fight against organized crime continues and will remain one of the key indicators for Albania's progress.

However, it is important to note that despite efforts in this direction, assessments related to Albania's results in the fight against organized crime are still weak and overall the fight against organized crime needs to be further strengthened.

European Commission Reports

The European Commission Reports for the period between 2018-2021 have assessed that the level of preparation of Albania in the fight against organized crime has remained the same (*some level of preparation*).¹⁰

The latest recommendations of the Progress Report for 2021 emphasize the need of the country to continue strengthening the fight against organized crime, to establish an office/agency for the recovery of assets as well as to strengthen the law enforcement against cybercrime in order to increase detection, investigation and prosecution (Table 1).

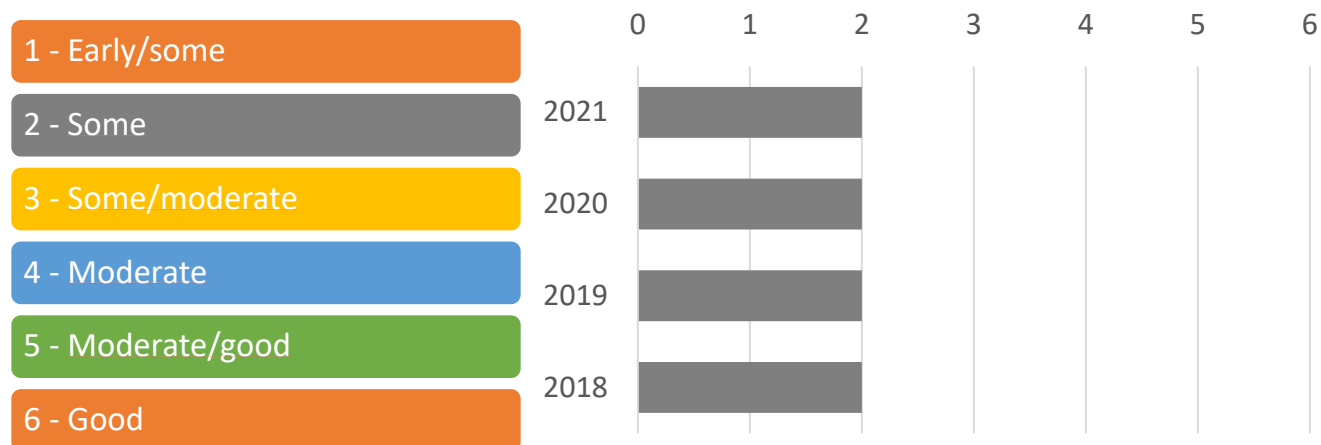


Figure 1: Assessments regarding the level of preparation of the country in the fight against organized crime (2018-2021)

Source: European Commission Reports on Albania

¹⁰ European Commission Reports on Albania: https://ec.europa.eu/neighbourhood-enlargement/enlargement-policy/negotiations-status/albania_en

0	Early
1	Early/some
2	Some
3	Some/moderate
4	Moderate
5	Moderate/good
6	Good

0	Backsliding
1	No progress
2	Limited progress
3	Some progress
4	Good progress

Year	Preparation	Progress	Recommendations – Report of European Commission for Albania
2021	Some level of preparation	Good progress	<ul style="list-style-type: none"> → keep strengthening the fight against organised crime, including through cooperation with EU Member States, as well as EU Agencies, including EUROPOL and EUROJUST; the number of Albanian law enforcement agencies that have access to SIENA should be further expanded; → establish without delay or designate an asset recovery office/agency in line with the EU <i>acquis</i> that is in charge of the identification and tracking of criminal assets, as foreseen by national legislation; → strengthen effective law-enforcement response on cybercrime to increase detection, investigation and prosecution.
2020	Some level of preparation	Good progress	<ul style="list-style-type: none"> → keep strengthening the fight against organised crime, including through cooperation with EU Member States, as well as EUROPOL; → adopt a new strategy and action plan on drugs, fill-in the legislative gap on drug precursors, and intensify the fight against drug trafficking; → adopt a cybercrime strategy and establish a more effective law-enforcement response focusing on the detection, traceability and prosecution of cyber criminals and address the growing phenomenon of pedo-pornography online.
2019	Some level of preparation	Good progress	<ul style="list-style-type: none"> → make further tangible progress in effectively dismantling organised crime groups, issuing deterrent sentences, taking away the proceeds of their crimes through asset confiscation, and addressing money laundering; → establish or designate an asset recovery office/agency in line with the EU <i>acquis</i> that is in charge of the identification and tracking of criminal assets; → adopt a new strategy and action plan on drugs, fill-in the legislative gap on drug precursors, and intensify the fight against the trafficking of hard-drugs; → adopt a cybercrime strategy and establish a more effective law-enforcement response focusing on the detection, traceability and prosecution of cyber criminals.
2018	Some level of preparation	Some progress	<ul style="list-style-type: none"> → progress further towards establishing a solid track record of proactive investigations, prosecutions and final convictions against organised crime groups; this should include intensifying investigations and prosecuting high-level members of organised crime groups; → set up, equip and build up the capacity of the Special Anti-Corruption and Organised Crime Structure and National Bureau of Investigation to fight organised crime, and ensure coordination between relevant existing structures; → intensify the fight against money laundering through the more effective use of criminal intelligence, identification, tracing, freezing and confiscation of crime proceeds; make reports of suspicious transactions admissible as evidence in court; introduce the concepts of extended confiscation and financial ceiling in cash transactions; and strengthen the capacity of law enforcement authorities to deal with tax fraud and tax evasion; → establish or designate a centralised agency in charge of the identification and tracking of criminal assets (asset recovery agency) in order to further enhance the effectiveness of the national asset recovery system and facilitate operational cooperation with asset recovery offices in the EU Member States.

Table 1: Recommendations regarding the level of preparation and progress of the country in the fight against organized crime (2018-2021)

Source: European Commission Reports on Albania

Trafficking in Persons Report

Another important assessment regarding Albania's achievements in the fight against organized crime is the US State Department's Annual Report on Trafficking in Persons.¹¹

The State Department places each country in this Report onto *three tiers*, as mandated by the Trafficking Victims Protection Act (TVPA):

- 1) Countries whose governments fully meet the TVPA's minimum standards for the elimination of trafficking;
- 2) Countries whose governments do not fully meet the TVPA's minimum standards but are making significant efforts to bring themselves into compliance with those standards;
- 3) Countries whose governments do not fully meet the TVPA's minimum standards and are not making significant efforts to do so.

Although the 2021 report praised Albania's efforts in the fight against trafficking, it is noted that the Government of Albania does not fully meet the minimum standards for the elimination of trafficking by remaining on Tier 2.¹²

The reports note the efforts of Albanian government to prevent trafficking and the continued implementation of the 2018-2020 National Action Plan (NAP) and the allocation of \$4.87 million for its implementation.

It should be noted, however, that despite these efforts the courts did not convict any traffickers (while they had convicted five in 2019). The appeals court reviewed and confirmed decisions on three traffickers (three in 2019). Also, it is noted that the government reduced the efforts of law enforcement agencies in this regard. The report recommends to vigorously investigate, prosecute, and convict traffickers, including complicit officials.

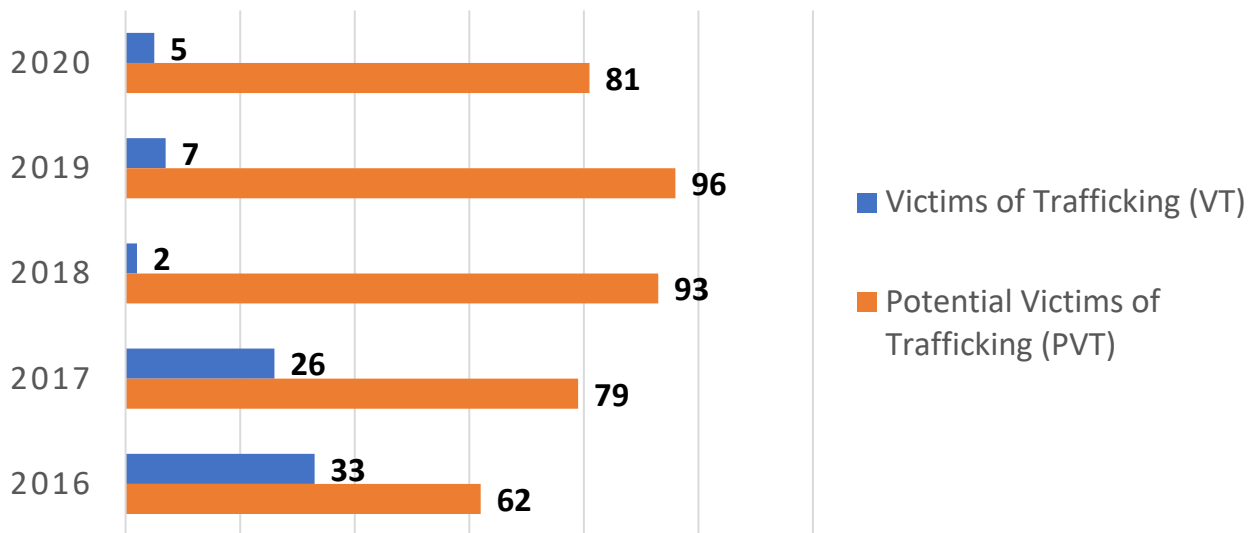
As evidenced by the graph data below, although in Albania after 2017 the number of victims of trafficking¹³ has decreased significantly, the number of potential victims of

¹¹ US Department of State, Trafficking in Persons Report: <https://www.state.gov/trafficking-in-persons-report/>

¹² Ibid, Trafficking in Persons Report 2021: <https://www.state.gov/wp-content/uploads/2021/09/TIPR-GPA-upload-07222021.pdf>

¹³ “Victim of trafficking” (VT) is referred to letter “e” of article 4 of Law No. 9642, dated 20.11.2006 “On the ratification of the Council of Europe Convention “On measures against trafficking in human beings”.

trafficking has increased,¹⁴ emphasizing thus the presence of disturbing trends related to trafficking in human beings.



Graph 1: Number of Victims of Trafficking (VT) and Potential Victims of Trafficking (PVT) in Albania

Source: Annual Reports of the State Department on Trafficking in Persons Reports and annual reports on the implementation of the Strategy on the fight against trafficking in persons

Global Organized Crime Index 2021

Other international assessments such as the Global Organized Crime Index also note the transnational extent of Albanian organized crime groups as well as of their criminal activities abroad, which consist mainly of trafficking of narcotics, trafficking in human beings and migrant smuggling.¹⁵

The Global Organized Crime Index 2021 analyses how organized crime operates in 193 UN member states, according to two matrices: according to their **criminality** on a

¹⁴ “Potential victim of trafficking” (PVT) is any person on whom the responsible agencies/institutions for initial identification, given the hints/indicators/in light of specific circumstances of the case deem that at least three or more elements constitute reasonable doubt that the person may have been trafficked.

- Ministry of Interior, “Standard Operating Procedures for the Protection of Victims of Trafficking and Potential Victims of Trafficking”, 2018: <https://mb.gov.al/wp-content/uploads/2019/12/PROCEDURAT-STANDARDE-T%C3%8B-VEPRIMIT-PER-MBROJTJEN-E-VIKTIMAVE-TE-TRAFIKIMIT.pdf>

¹⁵ Global Initiative Against Transnational Organized Crime, Global Organized Crime Index 2021: <https://ocindex.net/country/albania>

score from 1 to 10 (lowest to highest organized crime levels) and according to their **resilience** to organized crime, from 1 to 10 (lowest to highest resilience levels).

Albania scored 5.63 in the criminality score, ranking 61st out of 193 countries, 9th out of 44 European countries and 6th out of 17 Central and Eastern European countries. While in relation to the resilience score, Albania scored 5.04, ranking 87th out of 193 countries, 36th out of 44 European countries and 10th out of 17 countries in Central and Eastern Europe.

Albania serves as a source of and transit country for **human trafficking, and a transit location for irregular migrants** heading to Europe. Meanwhile Albanian criminal actors are allegedly responsible for a large number of trafficking victims detected in Western Europe. The Index also noted that Albanian organized crime groups are involved in international and domestic human smuggling operations and cooperate with other smugglers in neighbouring countries to facilitate their travel.

Regarding the trafficking of narcotics, Albania is considered a key transit country for **heroin and cocaine trafficked** from Latin America, while Albanian criminal actors also play central roles in the heroin and cocaine markets in Europe. These groups are estimated to have been involved in cocaine storage and distribution and have increasingly consolidated their influence over wholesalers and retailers across the continent. As a result, Albanian organized criminals have managed to control a significant portion of the cocaine trade in Europe.

Albania is also considered a transit country for heroin trafficked to Europe, via the Balkan route, originating from Turkey, Iran, Afghanistan and Pakistan. The trafficking is perpetrated by mafia-style actors and criminal networks known to cooperate with other criminal actors involved in the **heroin supply chain**. Most heroin is trafficked to Albania by land, through North Macedonia, but **heroin processing laboratories** have also been discovered inside the country by Albanian police.

The Index also highlights that Albania has been one of the largest cannabis producers in Europe for at least a decade, and although in recent years its cultivation has declined dramatically, Albania continues to be an important source of cannabis towards the EU, with drugs allegedly transported by sea via Italy and by land via Greece and Montenegro.

Networks between organized crime groups to **state actors** including corrupt police and judicial officials receiving political protection is one of the key assessments highlighted in the Index. Often these groups are involved in legitimate businesses and even their members have been appointed to political positions at various levels within the state apparatus.

Albanian organized crime groups control criminal markets for drugs and trafficking in human beings and are positioned as some of the most powerful criminal organizations in Europe by collaborating with criminal networks with a prominent presence in Belgium, the Netherlands and the United Kingdom.¹⁶

The **economic and financial environment** of the country is also considered as one of the main factors to make a strong resilience to organized crime. **Corruption, weak regulatory frameworks** and a significant **informal economy** make Albania vulnerable to money laundering. Given that a significant percentage of the country's economy is informal, the number of detected money laundering cases is low.

Outside the informal economy, many large-scale money laundering projects have been created as prestigious public-private infrastructure projects, such as football stadiums, theatres and shopping malls. Such large-scale projects often involve corrupt Albanian politicians and international actors, showing the extent to which organized crime is able to seize state institutions.

Despite the measures taken, the enforcement remains a significant challenge, especially with regard to the confiscation of seized assets. Albania was blacklisted by the Financial Action Task Force¹⁷ in early 2020, due to its inability to address strategic shortcomings in its anti-money laundering regime.

World Drug Report

In the annual report of the United Nations Office on Drugs and Crime (UNODC), the activity of Albanian organized crime groups is described as quite problematic too. The report cites Albanian networks as important in cocaine trafficking, where they are implementing the **“end to end” business model** - a model that excludes third parties and manages the process itself from the start to finish.¹⁸

Albanians make up a significant proportion of foreign nationals arrested in connection with individual cocaine seizures, estimated by the size of the amount seized. 25% of arrests in the first level of trade originate from Albania.

Albania is mentioned as the **main country of origin of cannabis** in Europe and the sixth in the world for the period from 2015 to 2019.

¹⁶ National Crime Agency (NCA), “National Strategic Assessment of Serious and Organized Crime”: https://www.nationalcrimeagency.gov.uk/who-we-are/publications?limit=100&sort=created_on&search=national%20strategic%20assessment&direction=desc

¹⁷ The Financial Action Task Force is an intergovernmental organisation founded in 1989 on the initiative of the G7 to develop policies to combat money laundering.

¹⁸ United Nations Office on Drugs and Crime (UNODC), World Drug Report 2021: <https://www.unodc.org/unodc/en/data-and-analysis/wdr2021.html>

Overall, and based on the above assessments, it can be said that while the volume and activities of organized crime have increased and expanded, Albania has a strong need to address more effectively its response to the fight against organized crime and to be prepared in accordance with the current challenges posed by it in the countries of the European Union as well.

III. European Union approach to the fight against Organized Crime

Organized crime and its dynamics over the years to be adapted to constant transformations, have been a serious problem for the member countries of the European Union.

From the published data, the economic loss due to organised crime and corruption has been estimated to represent between EUR 218 and EUR 282 billion annually.¹⁹ Profits of organised crime groups are estimated at EUR 110 billion per year in the EU.

In 2017 around half of organised crime groups in the European Union were involved in several types of criminal activities. More than 80% of active criminal networks in the European Union use legitimate business structures for their criminal activities, while there is a strong link between organized crime and corruption.

In this context, to improve the approach to the fight against organized and serious crime, the European Union increasingly highlighted the need to further develop and **consolidate existing structures and instruments**, as well as develop a **sustainable, multidimensional and integrated approach** in order to increase sustainability, efficiency, transparency and accountability against combating organized crime.

European Union policies in the fight against organized crime have focused on using a range of approaches, including preventive and disruptive ones which are incorporated with strengthening law enforcement and criminal justice.

Preventive Approach

The combined approach of using administrative law with criminal law began to be implemented in Europe in the 1990s. Crime prevention became an important issue of the European Union with the entry into force of the Amsterdam Treaty.

The European Crime Prevention Network (EUCPN), which was established in 2001, aims to stimulate and facilitate a network of competent contact points in the administrative field, as well as to address the phenomenon of organized crime groups considering national needs and special circumstances.

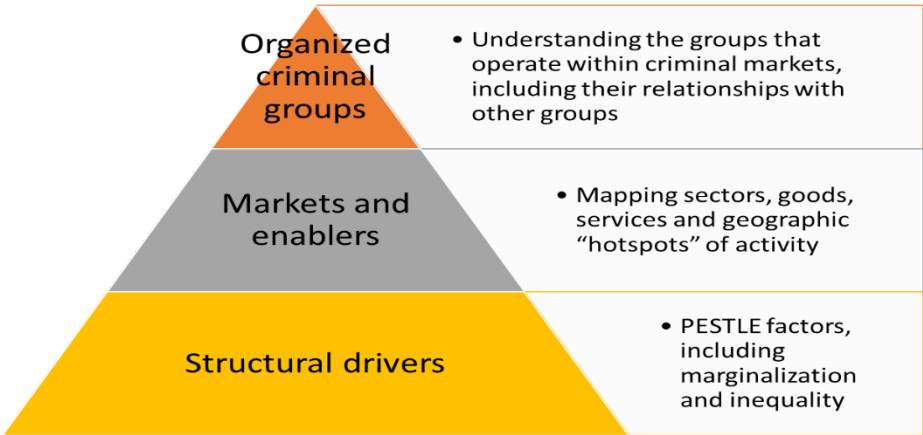
¹⁹ European Union Commission, “Fighting organised crime – EU strategy for 2021-2025”: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12735-Fighting-organised-crime-EU-strategy-for-2021-25_en

In addition, under the Dutch Presidency (2016), for the first time a definition on administrative approach was agreed by Member States. In the Council Conclusions on the administrative approach to preventing and combating serious and organized crime adopted by the Ministers of Justice and Home Affairs, member states were invited to combine elements of the administrative approach, which were then implemented by a number of states.²⁰

Drafting Strategies in reference to Analysis/Evaluations

Due to the complexity of organized crime and the need to address it in key documents such as strategies, conducting effective analysis is considered to be a very important element. These analyses of organized crime cover at least **three main components**, which include:²¹

1. **Organized crime groups:** Understanding the groups that operate within criminal markets, including their relationships with other groups;
2. **Markets and Enablers:** Mapping sectors, goods, services and geographic “hotspots” of activity; and
3. **Structural Drivers:** Identifying the political and economic factors driving organized crime, including marginalization and inequality. (PESTLE Analysis)²²



Graph 2: Components of effective analysis in order to develop strategies against organized crime

Source: United Nations Office on Drugs and Crime (UNODC)

²⁰ European Union Commission, 9061/16 “Draft Council conclusions on the administrative approach to prevent and fight serious and organised crime”: <https://data.consilium.europa.eu/doc/document/ST-9061-2016-INIT/en/pdf>

²¹ United Nations Office on Drugs and Crime (UNODC), “Organized Crime Strategy Toolkit for Developing High-impact Strategies”: https://sherloc.unodc.org/cld/uploads/pdf/Strategies/OC_Strategy_Toolkit_Ebook.pdf

²² A PESTLE analysis studies the key external factors (Political, Economic, Sociological, Technological, Legal and Environmental)

Together, these different components can lead to a more nuanced understanding of the political economy of organized crime, as well as help in understanding the various risks and trade-offs associated with the different interventions and policies contained in strategies.²³

EU Serious and Organised Crime Threat Assessment (SOCTA)

In the framework of actions taken in the fight against organized crime, in November 2010, the Council of the European Union decided on the establishment and implementation of the “EU Policy Cycle in the fight against organized crime and international serious crime”, known briefly as **EMPACT** (European Multidisciplinary Platform Against Criminal Threats), by creating a clear methodology regarding the implementation and evaluation of priorities in the fight against organized crime.²⁴

Among the key steps envisaged by EUROPOL, it initially produces the **European Union Serious and Organized Threat Assessment** (EU SOCTA), based on extensive data provided by Member States and other stakeholders. EU SOCTA identifies key EU threats affecting the EU and potential EU crime priorities.

The document provides a systematic and comprehensive analysis and assessment of criminal activities and networks, which affect the European Union. The assessment is based on a combination of operational knowledge, strategic intelligence and data from academia, the public and private sectors.

The preparation of the document is based on the contribution of close cooperation between EUROPOL, law enforcement authorities of EU Member States and third parties, such as EU agencies, international organizations and non-EU countries. SOCTA aims to assist decision-makers in **prioritizing the threats of serious and organized crime**, creating the opportunity for assessment in order to prepare and implement effective strategies.

²³ United Nations Office on Drugs and Crime (UNODC), “Organized Crime Strategy Toolkit for Developing High-impact Strategies”: https://sherloc.unodc.org/cld/uploads/pdf/Strategies/OC_Strategy_Toolkit_Ebook.pdf

²⁴ European Union Council “Draft Council Conclusions on the creation and implementation of an EU policy cycle for organised and serious international crime” 15358/10: <https://data.consilium.europa.eu/doc/document/ST-15358-2010-INIT/en/pdf>

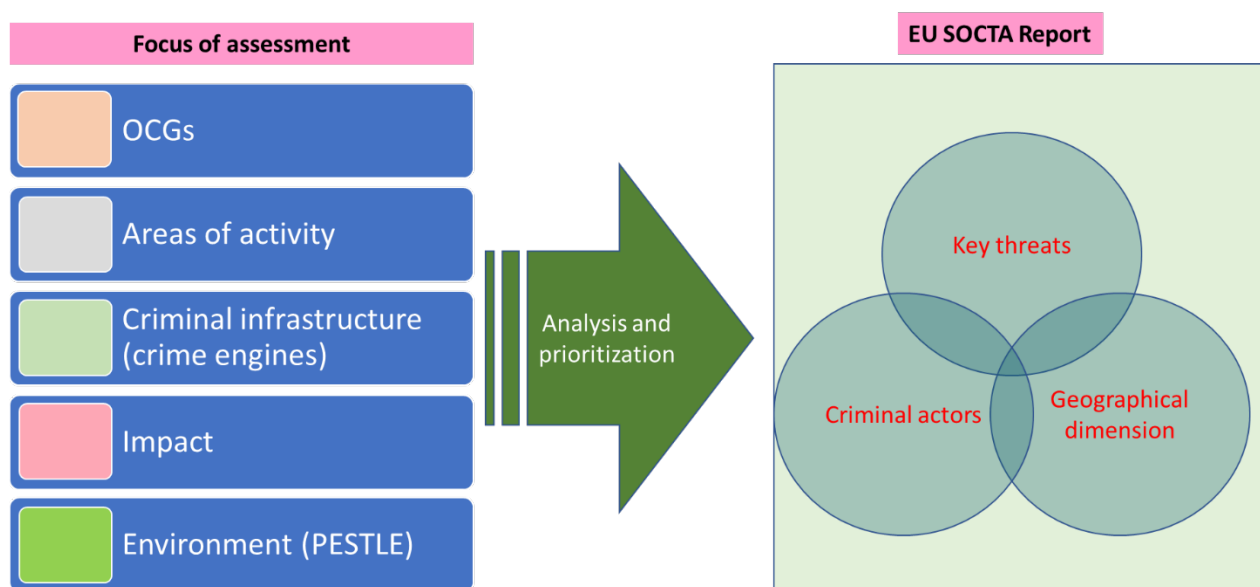


Figure 2. European Union Threat Assessment Methodology (SOCTA) 2021

Source: EUROPOL (SOCTA Methodology)

Drafting Comprehensive Organized Crime Strategies

Organized crime strategies are important instruments to address the phenomenon of organized crime, while the need for a multidimensional approach which involves different actors in the drafting and implementation of the strategy is increasingly identified.

Being an important instrument in the fight against organized crime, the clear definition of objectives, activities and tools is envisaged as one of the most important process for success in implementing organized crime strategies.

In this context, the key components for designing a strategy should include four general principles of **prevention, pursuing, protection and promotion**.²⁵ Based on these principles, the development of objectives should be carried out, which is the most critical component of a strategy.

²⁵ United Nations Office on Drugs and Crime (UNODC), “Organized Crime Strategy Toolkit for Developing High-impact Strategies”: https://sherloc.unodc.org/cld/uploads/pdf/Strategies/OC_Strategy_Toolkit_Ebook.pdf

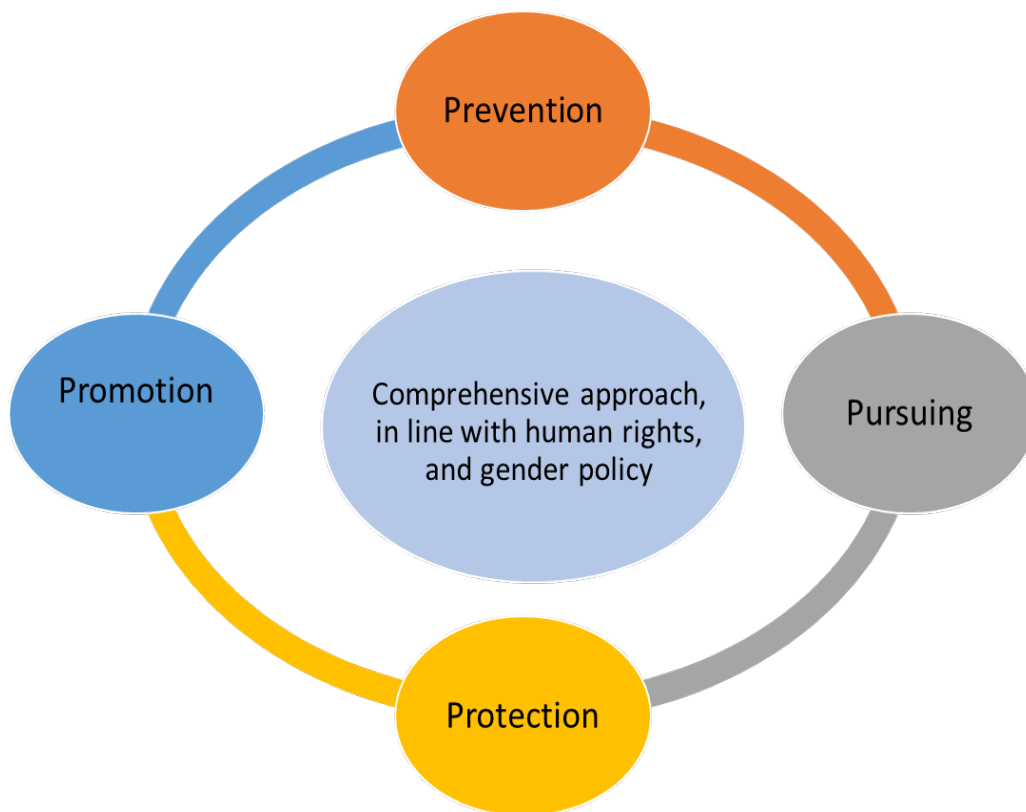


Figure 3. Four overarching strategic principles used to develop objectives in organised crime strategies

Source: United Nations Office on Drugs and Crime (UNODC)

Monitoring and evaluating the impact of the strategy is also an essential process to measure the success of implementing the organized crime strategies. This process is essential to determine the degree to which success has been achieved, including the achievement of various objectives.

In 2021 the European Union also adopted the **Strategy to Fight Organized Crime 2021-2025**, aimed to respond to the increase in the activity and spread of organized crime, and to improve and update the European Union's approach to the fight against crime organized.²⁶

The strategy aims to focus actions on key criminal markets and address corruption and the financial aspects of organized crime.

²⁶ European Union Commission, “Fighting organised crime – EU strategy for 2021-2025”: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12735-Fighting-organised-crime-EU-strategy-for-2021-25_en

Despite the different approaches that the European Union has adopted and implemented over the years in the fight against organized crime, it remains important to emphasize the process on the basis of which these approaches have been implemented.

Conducting a comprehensive assessment of main trends, threats and priorities in the field of organized crime is an important process based on which the objectives, activities and performance indicators are developed. By reflecting the general principles of *prevention, pursuing, protection and promotion*, it can be assessed the concrete outcomes achieved in the fight against organized crime.

IV. Albania's Strategic Approach to the Fight against Organized Crime

Albania began to adopt a strategic approach to fighting organized crime about 12 years ago in 2000, with the adoption of a series of strategies aimed at tackling various forms of trafficking, improving governance systems and combating corruption.²⁷

It should also be noted that in addition to the adoption of strategic documents, during the period of their implementation a number of action plans and other legal acts were also adopted in order to strengthen the fight against organized crime.

The first Intersectoral Strategy on Combating Organized Crime, Trafficking and Terrorism (ISCOC 2008) was adopted in 2008.²⁸ The Ministry of Interior was tasked with the coordination of the implementation of the ISCOG 2008 through the Technical Secretariat while all the institutions involved had to report every three months on the implementation. The Ministry of Interior was guided in its action by the Inter-Ministerial Working Group.

In response to the EU-issued recommendations, the Albanian Government adopted in January 2011 an Action Plan that sought to addressing the 12 key priorities, including the fight against organized crime (Priority 9).

Soon after the termination of ISCOG 2008, the Albanian government adopted the Intersectoral Strategy for Combating Organized Crime, Illicit Trafficking and Terrorism 2013-2020 and the Action Plan for the years 2013-2016 (ISCOC 2013).²⁹ ISCOG 2013 is perceived as the continuation of the ISCOG 2008, as provided in the related first chapter on the situation analysis.

The Action Plan for the period 2013-2016 was adopted at the same time together with the ISCOG 2013. After the termination of the Action Plan 2013-2016, no action plan was

²⁷ National Strategy on Combating Drugs 2006-2010;
National Strategy for the Fight against Child Trafficking 2008-2010;
National Strategy for Combating Trafficking in Human Beings 2008-2010;
Intersectoral Strategy on Prevention, Fight against Corruption and Transparent Governance, 2007-2013;
Integrated Border Management Strategy 2007-2013;
Public Order Sector Strategy 2007-2013.

²⁸ Decision of the Council of Ministers No. 1140, date 30.7.2008 “Intersectoral Strategy on Combating Organized Crime, Trafficking and Terrorism 2008”

²⁹ Decision of the Council of Ministers No. 663, dated 17.7.2013 “On the adoption of the Intersectoral Strategy for Combating Organized Crime, Illicit Trafficking and Terrorism 2013-2020 and the Action Plan 2013-2016”

adopted for a 2-years term, while one year before the ISCOG 2013-2020 expired the government approved an Action Plan for the period 2019-2020.³⁰

During the implementation period of ISCOG 2013-2020, other measures were also adopted and implemented in the fight against organized crime. Respectively, in 2015 it was approved an Action Plan on Socio-Economic Re-Integration of Women and Girls, Victims of Trafficking.³¹

In response to the growing trend of cannabis cultivation during the years 2015-2016, a new Action Plan was adopted in March 2017.³² Later in November 2017, the Ministry of Interior launched the operation 'Power of Law' and the special Task Force against organized crime.³³ In 2020 it was approved the Normative Act "On preventive measures in the fight against terrorism, organized crime and serious crimes and consolidation of public order and security".³⁴

Strategy against Organized Crime and Serious Crime, 2021-2025

The new Strategy against Organized Crime and Serious Crime, 2021-2025 and the action plan 2021-2022 (SOCSC) were approved at the end of 2020 and entered into force in January 2021.³⁵ The new strategy envisages 3 main policy goals, for the achievement of which are foreseen **12 specific objectives** and **59 measures**. The strategy envisages that these priorities, objectives and measures will be implemented according to the approaches of: *1. Pursue; 2. Prevention; 3. Protection*.

³⁰ Decision of the Council of Ministers No. 616, dated 18.9.2019 "Adopting the action plan for 2019–2020, implementing the Cross-cutting Strategy on Combating Organized Crime, Illegal Trafficking and Terrorism 2013–2020"

³¹ Decision of the Council of Ministers No. 115, dated 17.2.2016 As addition to Council of Ministers' Decision No. 663, dated 17.7.2013 "On the adoption of the 2013-2020 Cross-cutting Strategy of the fight against organized crime, illicit trafficking and terrorism, and 2013-2016 Action Plan"

³² Decision of the Council of Ministers No. 248, dated 29.3.2017 "On the approval of the Action Plan against Cannabis Cultivation and Trafficking 2017–2020"

³³ Ministry of Interior, "The Force of Law" – Special Task Force against organized crime is established: <https://mb.gov.al/2017/11/07/forca-e-ligjit-krijohet-task-forca-speciale-kunder-krimet-te-organizuar-2/>

³⁴ Normative Act No.1, dated 31.1.2020 "On preventive measures in the fight against terrorism, organized crime and serious crimes and consolidation of public order and security"

³⁵ Decision of the Council of Ministers No. 1140, dated 24.12.2020 "On the approval of the Strategy against Organized Crime and Serious Crime, 2021-2025 and action plan 2021-2022": <https://mb.gov.al/plane-dhe-strategji/>

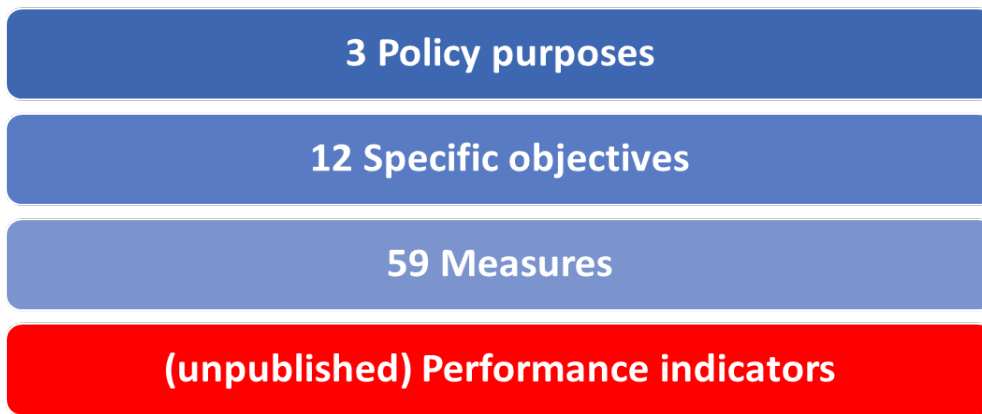


Figure 4: Goals, Objectives and Measures set out in the Strategy against Organized Crime and Serious Crimes, 2021-2025

Source: Ministry of Interior

The Strategy envisages 18 institutions which are responsible for the implementation of the Strategy against Organized Crime and Serious Crimes and its Action Plan, while the Ministry of Interior is the responsible institution leading the drafting and coordination of these institutions, as foreseen in this Strategy.

Ministry of Interior (Coordinating institution)	Ministry of Interior
	Ministry of Justice
	Ministry of Defence
	Ministry of Infrastructure and Energy
	Ministry of Culture
	Ministry for Europe and Foreign Affairs
	Ministry of Finance and Economy
	Ministry of Education and Sport
	Ministry of Health and Social Protection
	Ministry of Tourism and Environment
	Ministry of Agriculture and Rural Development
	Special Structure Against Corruption and Organized Crime
	High Judicial Council
	Prosecutor General's Office
	State Intelligence Service
National Authority for Electronic Certification and Cyber Security	
Financial Supervisory Authority	
Bank of Albania	

Figure 5: Responsible institutions for the implementation of the Strategy against Organized Crime and Serious Crimes, 2021-2025

Source: Ministry of Interior

The monitoring of the Action Plan is planned to be carried out by the Group for Integrated Policy Management (GIPM), while the participants in this process are also representatives from the main institutions responsible for security issues, including the Ministry of Interior, General Directorate of State Police, Ministry of Justice, Ministry of Education, Sports and Youth, Ministry of Health and Social Protection, etc., donors and civil society (representatives of non-governmental organizations).

Regarding the reporting process, the institutions in charge of implementing the strategy will have to prepare mid-term and annual reports in compliance with the obligations set out in the Action Plan of the Strategy, while the Ministry of Interior is the leading institution for collecting, processing and analysing mid-term and annual reports.

Institutions are also charged with reporting periodically on the implementation of measures, with a periodicity of six months through data reported in the Integrated Planning System Management Information System (IPSIS) to the Council of Ministers and the Inter-Institutional Technical Secretariat.

The Sectoral Steering Committee “Internal Affairs”, chaired by the Minister of Interior, will review, discuss and approve progress reports, as well as monitor the achievement of goals and priorities in the implementation of this strategic document and its action plan.

The Strategy against Organized Crime and Serious Crimes will also be measured through two evaluations, a **(i) mid-term evaluation** to be carried out at the end of the two-year period, at the end of 2022, and a **(ii) final evaluation** after the end of the implementation period (Figure 6).

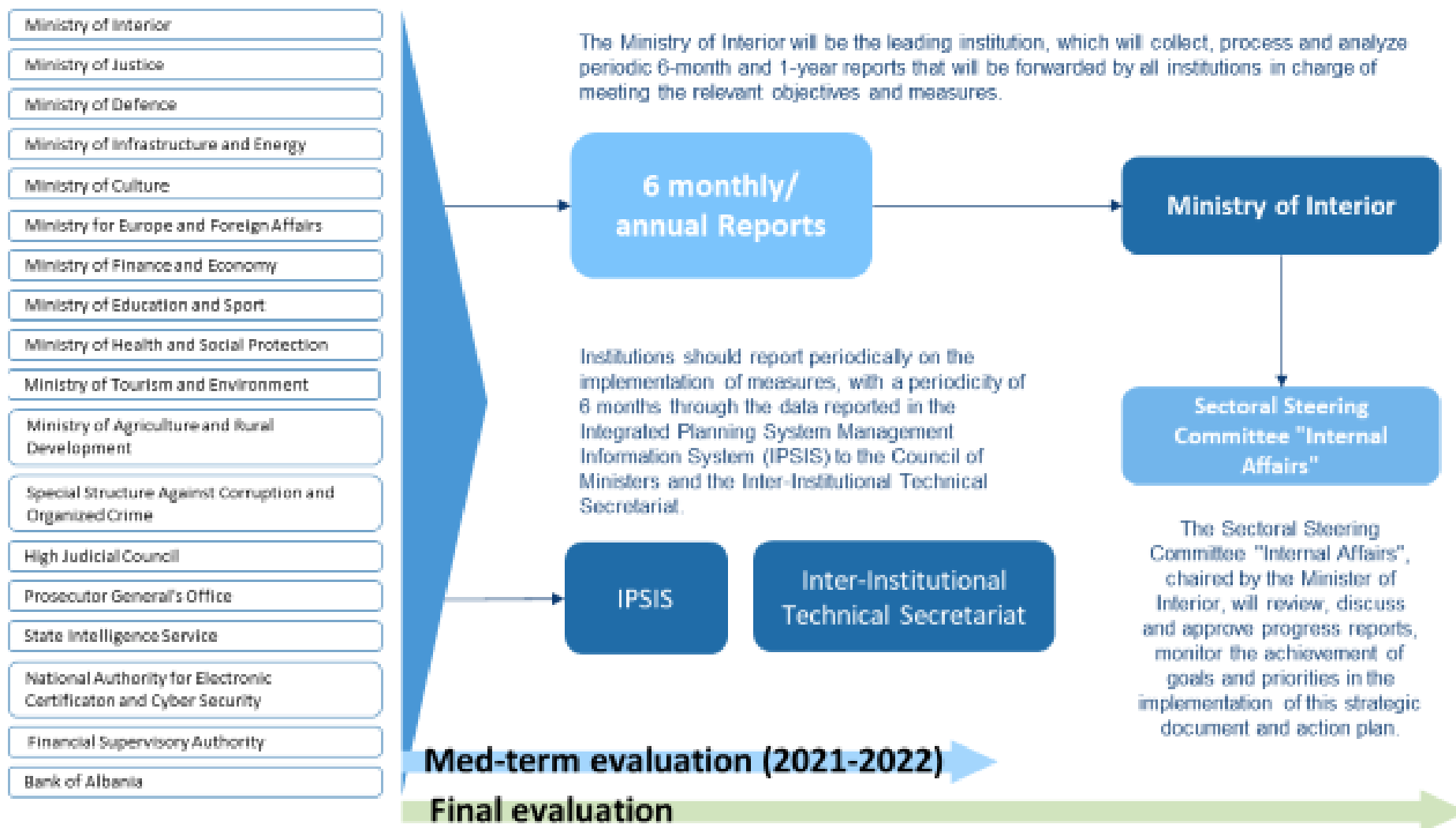


Figure 6. Evaluation Process of the Strategy against Organized Crime and Serious Crimes, 2021-2025

Source: Ministry of Interior

Fighting organized crime in line with European Union's approach

Despite the strategic framework and various legal acts that Albania has adopted and implemented in the framework of the fight against organized crime, the followed approach presents some fundamental shortcomings that have affected outputs archived by the country so far.

An attempt to assess the **shortcomings of the strategic framework** in the fight against organized crime, was the Report “Baseline Assessment of the Intersectoral Strategy on Countering Organised Crime, Illicit Trafficking and Terrorism 2013-2020” prepared in 2020.³⁶

The overall aim of the report was to contribute to the fight against organized crime in Albania by providing the government institutions with independent assessment to be analysed and discussed and to supporting their efforts to strengthen monitoring and evaluation capacities.

The report aimed also to support the process of drafting and consultation of the next document by providing applicable recommendations and platforms for discussion with a broader range of stakeholders.

As an external evaluation, the report provided an additional angle for analysing the achievements and failures in meeting the goals, objectives and targets set out in the current document, as well as analysing the factors that have contributed to their achievements and/or failures.

One of the serious shortcomings identified in Albania's approach to the fight against organized crime is related to the **lack of a full and comprehensive assessment, according to a well-defined methodology** similar to that of SOCTA. The lack of such an assessment has created gaps in the definition and identification of the main organized crime threats of Albania and consequently has affected the formulation of organized crime strategies.

This gap is reflected in the **discrepancy** between the context of organized crime and the goals, objectives, expected results, impact and logical discrepancies of the results set out in the strategy: objectives-activities-indicators, which makes it difficult to measure results and impact.

³⁶ Center for the Study of Democracy and Governance, “Baseline Assessment: Intersectoral Strategy on Countering Organized Crime 2013-2020”, Link of publication: <http://csdgalbania.org/sq/wp-content/uploads/2020/12/Raport-vleresimi-Krimi-i-organizuar.pdf>

These shortcomings are also identified in the new Strategy against Organized Crime and Serious Crimes, 2021-2025. The definition of envisaged objectives and measures/activities does not follow the complete Cycle of the Outcome Chain, which includes the definition of *inputs, outputs, outcome and impact* in order to meet the objectives.

On the other hand, a considerable part of the measures/activities foreseen in the Strategy against Organized Crime and Serious Crimes 2021-2025 for each of the 12 specific objectives are drafted as output or outcome and cannot be implemented as such.

The lack of these elements makes unclear and confusing the monitoring and evaluation on the fulfilment of the envisaged objectives and strategic goals themselves (Policy Goals), as for each envisaged measure/activity certain outputs must correspond, resulting from the measures/activities and outcome, which serve to assess the level of fulfilment of the intended results.

Also, the **lack of the publication of performance indicators** in the Action Plan 2021-2022 highlights another shortcoming in the formulation of the strategy. To measure and evaluate the level of implementation and achievement for each of the measures/activities, output and outcome, it is important to define respective indicators. In this way it is impossible to assess the process, outputs and impact.

Performance indicators are one of the key elements in terms of monitoring and evaluating the strategy as well as the implementation of the law against organized crime. In this context, the lack of these indicators constitutes one of the serious shortcomings of the Strategy against Organized Crime and Serious Crime 2021-2025.

As evidenced in the above-mentioned report, the **lack of regular monitoring and communication reports** on the implementation processes of the strategy constitutes one of the major shortcomings, affecting the purpose for which these documents have been approved.

During the implementation of ISCOG 2013-2020, there were no public debate in the National Assembly based on reports on the implementation of the Strategy, even though organized crime has been a predominant topic in political rhetoric and discourse. This meant that the strategy, its implementation and the data/conclusions did not affect the drafting of measures or policies against organized crime in the years 2013-2020.

Another issue is related to the public **accountability** and **evaluation of efficiency and effectiveness** of the strategy. The new Strategy against Organized Crime and Serious Crime, 2021-2025 does not foresee the publication of Monitoring and Implementation

Reports, making it impossible to involve stakeholders and independently evaluate the achievement of the objectives and of the strategy as a whole. This is important even against the funds dedicated to the implementation of the strategy for which about EUR 164 million are planned for five years (EUR 33 million per year).

There are additional shortcomings in addressing other approaches to the fight against organized crime, such as the preventive approach. Although various laws in Albania include administrative measures to prevent the access of organized crime in the economy and to disrupt it economically, these measures do not stem from a clear or well-thought-out political approach to the use of administrative measures.³⁷

On the other hand, the lack of a policy has affected the way the legislative framework is drafted. It can be said that there is a **lack of systems and capacities for data collection, storage and use**, as well as for making available to agencies and coordination between them in implementation.³⁸

³⁷ Arjan Dyrmishi, Mandrit Kamolli, “The administrative approach in fight organized crime: Exploring the possibility of implementation in Albania”: <http://csdgalbania.org/wp-content/uploads/2018/11/The-administrative-approach-in-fighting-organized-crime-in-Albania.pdf>

³⁸ Ibid.

Conclusions

While the volume of organized crime has increased, the application of effective approaches in combating this phenomenon remains a key and important factor in achieving concrete outputs.

Despite the drafting and implementation of the strategic framework that Albania has undertaken to combat organized crime, especially after the 2000s, there is still a lack of a well-defined approach to address this phenomenon.

This has happened as result of the shortcomings identified to conduct systematic, comprehensive assessments based on a well-defined methodology, in order to make it possible and to reflect concrete objectives and indicators in accordance with the set principles.

On the other hand, to effectively combat organised crime is not sufficient to only disrupt organized crime groups or/and confiscate their assets, as by the time this is done the harm to the public interest and specific individuals has also been consumed.

While disruption is important and should be pursued by preventing organized crime groups from further infiltrating the economic, social and political spheres, which are crucial factors.

The importance of prevention is better highlighted by the achievements of the two Counter Organized Crime Strategies of 2008-2013 and 2013-2020 which focusing predominately on disruption have run in parallel with organised crime causing its grown more and more influential.

Prevention should combine different forms, ranging from education and awareness activities/campaigns on the threats arising from organised crime so as to increase societal and business resilience, up to the involvement of the public administration in preventing organised crime's access to the legal economy (administrative approach), including administrative confiscation that has been used more frequently recently.

Recommendations

The developments and trends in the structuring and organisation and networking among organized crime groups require an improved understanding of those trends and therefore improved capacities and tools to monitor those trends.

In this context, it is necessary to collect systematic **data and statistics** on financial and other resources to guide policy decisions and other measures. Also, **developing methods** to systematically collect analyse and make use of data related to a better understanding of the organisational manner is necessary.

In addition to the knowledge on groups and criminal activities, gaining knowledge on the **overall value of the organized crime market** and the **level of infiltration of legal businesses** by organized crime groups is key to measuring the effectiveness of the fight against organised crime.

Developing and **strengthening the capacities** to collect data on the volumes of profits generated from different organised crime activities will increase the knowledge of the law enforcement.

As the organized crime groups operate at a transnational level, both in Albania's and EU areas, they should be considered and investigated as **inseparable entities**.

The effective action against organised crime activities requires a **combination of prevention and protection, suppression and awareness raising approaches**.

As use of violence remains a key *modus operandi*, the focus should be increased towards the **identification and provision of protection to victims** of organised crime.

The strengthening of frameworks to reduce organised crime's influence on political processes and the improved quality of screenings to judges, prosecutors, and police officers, beyond the one-time vetting process are necessary.

Conducting, publishing and periodically discussing the assessment of organized crime threats according to the EU SOCTA Methodology should be an ongoing process. It is necessary that for the drafting of this analysis according to the SOCTA methodology to **strengthen the internal capacities of the respective Albanian institutions**, through specific trainings dedicated to the responsible employees, thus ensuring the continuity of their work and increasing their skills.

In relation to the drafting and implementation of strategic documents, **capacity needs to be built** to conduct the assessment, which should be **multidisciplinary and comprehensive**. A **framework for informed public discussion and consultation** should

also be established by continuously and consistently involving social actors and stakeholders by improving public debate through direct participation.

The **Results framework** should be clearly and coherently defined in accordance with the principles of *Prevention, Disruption, Protection and Promotion*, in order to make it possible to accurately measure the results of the strategy and achieve the envisaged objectives.

The effective action against organised crime activities requires a combination of prevention and protection, suppression and awareness raising approaches, in order to make it possible to accurately measure the results of the strategy and achieve the envisaged objectives.

Publishing the monitoring reports of the strategy is important to ensure **transparency and accountability** and to assess results and achieved objectives.

There should be a concrete focus on preventing organized crime in line with the EU administrative approach to organized crime.

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- Law Nr. 9643/2006 “On Public Procurement”, as amended
- Law No. 138/2015 “On ensuring the integrity of persons elected, appointed, or holding public functions”
- Law No.84/2016 “On the Transitional Re-evaluation of Judges and Prosecutors in the Republic of Albania”
- Law No. 12/2018 dated 5.3.2018 “On the transitional and periodic re-evaluation of state police, guard of the Republic of Albania and Service for Internal Affairs and Complaints at the Ministry of Interior”

Strategic Documents and Action Plans

- National Strategy on Combating Drugs 2006-2010
- Public Order Sector Strategy 2007-2013
- Integrated Border Management Strategy 2007-2013
- Intersectoral Strategy on Combating Organized Crime, Trafficking and Terrorism 2008
- National Strategy for the Fight against Child Trafficking 2008-2010
- National Strategy for Combating Trafficking in Human Beings 2008-2010

- Intersectoral Strategy on Prevention, Fight against Corruption and Transparent Governance, 2007-2013
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- Decision of the Council of Ministers No. 115, dated 17.2.2016 As addition to Council of Ministers' Decision No. 663, dated 17.7.2013 "On the adoption of the 2013-2020 Cross-cutting Strategy of the fight against organized crime, illicit trafficking and terrorism, and 2013-2016 Action Plan"
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- Action Plan against Cannabis Cultivation and Trafficking 2017–2020

