ADVANCING MEDIA OWNERSHIP TRANSPARENCY REFORM IN ALBANIA

*Gap analysis,
alignment with European
and international standards
and good practices,
and a practical roadmap*

Organization for Security and
Co-operation in Europe
Presence in Albania

Advancing Media Ownership Transparency Reform in Albania: Gap Analysis, Alignment with European and International Standards and Good Practices, and a Practical Roadmap

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Executive Summary

Albania's media system stands at a crossroads. A lively and competitive scene hides a structural imbalance: a handful of powerful broadcast groups dominate while most online outlets operate off the books. The result is a media market that looks plural on the surface but remains opaque underneath. The European Commission's 2024 report captured it rather bluntly, criticising the insufficient progress on ownership transparency and persistent overlaps between political and business interests.

This study confirms that conclusion. While many of the challenges in the Albanian media, including regulatory capture, labour precarity and concentrated ownership, are deeply interconnected, transparency remains the foundation on which all other reforms depend. Without clear, accessible and verifiable information on who owns and funds the media, no regulatory measure or policy protections can deliver real accountability.

Albania has already taken the first step by creating an audiovisual media ownership registry, but the next steps, widening its scope, deepening its data and ensuring its enforcement, will determine whether transparency becomes a living principle or remains a formal exercise.

At present, the system resembles a puzzle with half its pieces missing. Ownership data for television and radio may be available, but the growing online sector, where an increasing number of people now get their news, remains outside official oversight. Hundreds of portals operate anonymously, some as commercial shells, others as political or corporate vehicles.

Equally problematic is the opacity surrounding public funding for the media. Public money is often channelled through intermediaries, marketing agencies or municipal offices, without consistent publication of amounts, recipients or criteria. The lack of a transparent system for allocating these funds allows political influence to seep into editorial decision-making, rewarding compliant outlets and marginalising critical ones. In effect, public funding for the media can become a soft tool of control, a way to bend the market without breaking it.

European standards are unambiguous on these matters. The European Media Freedom Act (EMFA), which took effect in August 2025, sets clear rules for ownership disclosure, transparency of state advertising and the independence of regulators. It requires all media outlets to reveal their legal and beneficial owners, publish information about their funding, and disclose revenue received from state sources. The Council of Europe and OSCE go further, framing transparency as a democratic safeguard rather than a bureaucratic obligation. By these benchmarks, Albania's framework is still narrow, fragmented and overly dependent on self-reporting.

To bridge this gap, Albania needs to evolve from fragmented disclosure toward a comprehensive and balanced transparency framework. This would ideally involve a media-neutral law extending ownership and funding disclosure obligations to all media actors, while carefully avoiding any form of indirect control that would contravene Council of Europe standards *(see 1. Purpose, Scope and Methods section)*, especially given persistent concerns about the independence of regulators and the broader political context.

Such a framework should require media companies to publish information about their legal and beneficial owners (including family or proxy ties), links to state contracts and concessions, and annual financial reports specifying their income sources. Yet proportionality is essential: sanctions and compliance burdens should not weigh disproportionately especially on small, non-profit outlets, which are often most vulnerable to political or administrative pressure.

The same caution applies to the transparency of public funding to media. It is legitimate to seek disclosure from recipients, but an even stronger obligation lies with the public authorities that disburse these funds. Ministries, municipalities, and state-owned enterprises have a legal and ethical duty to proactively publish detailed data on all media-related payments, procurement, sponsorships, and advertising contracts, to ensure accountability at the source rather than shifting the burden entirely onto media outlets.

Equally important is defining who qualifies as "media." While traditional audiovisual and print actors are clearly covered, ambiguity surrounds online communicators: should influencers, podcasters, local NGOs running community websites, or satirical Facebook pages with large audiences fall under these rules? Satire and parody, as protected forms of political expression, for example, may require specific safeguards.

Any centralised registry combining ownership and funding data should therefore be managed by a genuinely independent body and designed to ensure transparency without imposing indirect control. Clear definitions, proportionate obligations, and procedural protections are essential to prevent this system from becoming a mechanism of political interference rather than a genuine instrument of public accountability.

A coordinated reform effort is essential, involving not only public institutions such as the Ministry of Justice, the media regulator, and Parliament, but also the media community itself, including journalists' associations, newsroom representatives, and emerging tech and data-driven startups. The process should be characterised by openness to consultation, transparency, and continuous follow-up by civil society actors, experts, and professional organisations.

The desired result would be a well-designed, public and verifiable transparency framework. That would not only bring Albania closer to European standards in the media field but would also have a wider societal impact by helping to restore public trust. It would allow citizens to see who stands behind the news they consume, enable policymakers to detect conflicts of interest, particularly for large audiovisual media, and allow transparent media outlets to compete on fair terms. Such a framework would ultimately help the Albanian media evolve into one that is more pluralistic, independent and credible.

1. Purpose, Scope and Methods

This paper was commissioned by the OSCE Presence in Albania under the project *Enhancing media freedom and governance: a strategic approach to media development and public communication in Albania (Phase 1)*. The study responds to the European Commission's 2024 Report on Albania and supports the country's progress towards EU accession by focusing on one of the most sensitive areas of media governance: media ownership transparency and pluralism.

The purpose of this paper is to provide a legal and policy analysis of media ownership transparency across all media types (print, broadcast, radio, and online) in the Albanian context. The scope is framed by Albania's OSCE principles and commitments and the broader EU integration process, particularly reforms required to align national frameworks with the European Media Freedom Act (EMFA), the Audiovisual Media Services Directive (AVMSD), and Council of Europe (CoE) recommendations on media transparency and pluralism. The analysis also situates Albania in comparative perspective, drawing selectively on EU and Council of Europe practices to identify workable models and gaps.

The study combines several methodological approaches. First, a desk review was conducted of Albania's existing legislation, by-laws and regulatory acts relevant to media ownership and transparency. Second, an assessment was made of the Audiovisual Media Authority's (AMA) ownership registry, which publishes declarations by licensed or authorised outlets, to examine the effectiveness and completeness of current disclosure mechanisms. Third, the paper draws on stakeholder interviews with journalists, regulators, civil society representatives and legal experts to capture the practical challenges of implementation (a total of seven interviews were conducted for this report). Fourth, relevant European and international standards were reviewed, including the EMFA, the AVMSD, and CoE Recommendations (2007/2 and the 2018 standards on media transparency and ownership).

The analysis relies on a series of sources, including the 2024 European Commission Report on Albania, AMA materials and registry data, relevant court practice, and earlier OSCE background papers as well as the latest research studies about Albanian media available. Together, these inputs are aimed to provide a balanced picture of the legal framework, its enforcement in practice and the degree of alignment of Albania's system with European standards and commitments.

2. Context and Market Overview

2.1 Market Map

The Albanian media market presents a paradox of density and fragility. On the one hand, the number of outlets is strikingly high compared to the size of the country; on the other, concentration of ownership and structural opacity limit pluralism and distort the market. The four main segments, broadcast television, radio, cable/OTT/VOD and online news organisations are regulated unevenly, with online-only outlets almost entirely outside the legal framework.

Television remains the dominant medium in Albania's information ecosystem. According to the AMA, 34 private TV broadcasters are licensed, three of which operate nationally, with the remainder serving local or regional audiences.[1] Alongside them, the public service broadcaster Radio Televizioni Shqiptar (RTSH) runs multiple television channels and radio frequencies.

The AMA has also licensed 53 private radio stations, three of them national. Radio plays a comparatively small role in both the advertising market and opinion-shaping. Reliable financial or audience-share data are scarce, as most radio stations belong to larger conglomerates and do not publish separate accounts. This makes ownership concentration difficult to assess, though anecdotal evidence points to limited diversity.

Albania's pay-TV and streaming segment is fragmented. AMA registers 66 cable providers, seven IPTV operators, 10 OTT services, two VOD services and two satellite subscription platforms. Distribution is competitive at the infrastructure level, but most cable/IPTV operators carry the dominant national broadcasters, reinforcing their reach. OTT platforms, including regional and international services, have expanded significantly, though the domestic market's small scale limits the viability of standalone Albanian VOD initiatives.

Cable and satellite fall under audiovisual regulation, but enforcement is weak. "Must-carry" obligations exist in law yet are inconsistently applied, while measures to promote public-interest content remain underdeveloped.

The most dynamic yet opaque part of the market is online media. Estimates suggest there are between 740 and 750 online portals in Albania[2], although other mappings, due to methodological differences, identified around 150 active outlets[3]; despite these differences, it remains a large and highly dynamic sector. This proliferation creates the appearance of plurality but is often marked by duplication, copy-paste journalism, and low editorial standards. Unlike audiovisual media, online outlets are not required to

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[1] Data sourced from the Audiovisual Media Authority (AMA) database (https://ama.gov.al/oshma/), accessed 15 September 2025.

[2] Londo, I. (2025). *Our Media: Albania. Civil society report on media and journalism in Albania*. Tirana: SEENPM, p 13. https://futureofmedia.seenpm.org/wp-content/uploads/2025/03/Ourmedia-Albania-EN.pdf.

[3] Cukali, K. (2025). *Albanian Media Study 2025: Comprehensive Landscape Mapping*. UNESCO. https://kshm.al/wp-content/uploads/2025/07/Mapping-2025-anglisht.pdf)

register with AMA. Many exist only as commercial businesses, NGOs, or remain unregistered altogether, making ownership and financing nearly impossible to trace.

The Albanian advertising market reached about €72 million in 2023—double its pandemic-year low of €35 million in 2021. Television absorbs 76% of this revenue, underscoring its continued dominance. Print has nearly vanished: only seven dailies remain, with most weeklies and regional titles closed. Online outlets capture a growing but largely unquantified share of advertising.

Public funding for the media[4] is another major source of distortion. Allocation often lacks transparency, frequently bypassing open procurement procedures and being channelled through subcontractors or marketing agencies. This system is highly vulnerable to political influence, with funds selectively directed to outlets favourable to the authorities. The problem is not only procedural but structural: such practices distort market competition and directly affect editorial independence. Recent developments illustrate the scale of this distortion. For example, following the August 2025 shutdown and operational blockade of News24[5], the outlet faced significant economic pressure and reported difficulties in sustaining advertisement income, reflecting the broader risks for outlets critical of government authorities.

Implementation of the EMFA will oblige Albania to introduce non-discriminatory rules for distributing public funding across all platforms, including online media. Ensuring that these mechanisms are applied impartially and independently will be essential to prevent public resources from being weaponised as instruments of political control. (*see 4.1 What EMFA/AVMSD Require*)

2.2 Summary of Systemic Risks

The European Commission's 2024 Albania Report[6] highlighted persistent and deep-rooted systemic risks that continue to undermine media independence and pluralism. Four areas stood out as particularly critical: ownership concentration, the overlap between political and business interests, opaque financing, and weak labour protections in the sector. Together, these risks create a fragile environment in which journalism struggles to fulfil its democratic role.

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[4] In this report, we will use the term "public funding for the media" to refer broadly to all financial resources channelled from public institutions to media outlets — including not only state advertising, but also grants, subsidies, and project-based allocations. The term "state advertising" as an all-encompassing descriptor can be misleading in the Albanian context, where direct advertising expenditure represents only a small share of overall public financial influence on the media.

[5] Kadriu, E. (2025, August 11). *Journalists show solidarity against the blocking of "News24."* Citizens.al. https://citizens.al/en/2025/08/11/gazetaret-solidarizohen-kunder-bllokimit-te-news24/

[6] At the time of conducting research for this article, the *European Commission Albania 2024 Report* was the most recent source available and therefore served as the main reference for the analysis of media freedom in the country. The *European Commission Albania 2025 Report*, which was consulted shortly before the publication of this study, does not substantially alter the Commission's assessment of the state of media freedom, confirming the continued relevance of the 2024 findings. See European Commission. (2024). *Albania 2024 Report*. Directorate-General for Neighbourhood and Enlargement Negotiations. https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68_en?filename=Albania%20Report%202024.pdf; and European Commission. (2025). *Albania 2025 Report*. Directorate-General for Neighbourhood and Enlargement Negotiations. SWD (2025) 750 final. Brussels, 4 November 2025.

High ownership concentration remains one of the most acute problems in Albania's media market. The EC report notes that media independence is "negatively influenced by the overlap of political and business interests in terms of funding and content and high ownership concentration."[7] This dynamic distorts editorial priorities, leading to systemic self-censorship and selective coverage that privileges ruling elites and their allies.

Commercial television is dominated by a small group of conglomerates: Klan, Top Media, and Vizion Plus[8], alongside Focus Group (owned by Irfan Hysenbelliu) and Carlo Bollino's outlets. These groups span television, radio, online portals, and in some cases, pay-TV or distribution platforms. BIRN's Media Ownership Monitor found that the four largest owners account for nearly 87% of the television audience, with the top two groups alone capturing over 60% of market revenues in 2023. This concentration is almost double the level recorded in a 2018 BIRN study, which found that the four largest owners commanded between 48.9% and 58.6% of the free-to-air TV audience.[9] Such consolidation is unusually high by European standards and raises systemic concerns for pluralism.[10]

The risks are not only structural but also institutional. The Audiovisual Media Authority (AMA), the body mandated to act as an independent regulator, operates under an appointment framework that exposes it to political influence. Although formally independent and recognised for its regulatory and monitoring role, its board composition reflects parliamentary balances, which can affect public perceptions of autonomy.[11] AMA officials and other observers interviewed for this report note that in practice, its decisions have been rarely contested lately by courts or media operators as major licensing decisions were made years ago, reducing immediate political sensitivities. Nevertheless, the institutional design leaves scope for improvements to strengthen functional independence and resilience against future interference.

The public broadcaster is likewise exposed to political capture. The appointment of its Director General, who, until autumn 2024, was a member of parliament and ruling party official, exemplified the blurred line between state media and government communication.[12] Such practices counter European standards and reinforced perceptions that the broadcaster served the ruling elite rather than the public. Following

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[7] European Commission, Albania, 2024, *cit.*, p. 37.

[8] Klan, Top Media, and Vizion Plus hold national broadcasting licences and operate digital platforms targeting the Albanian diaspora, such as DigitALB and Tring. All three groups have been granted *strategic investor* status by the government, a status linked to investments in tourism, infrastructure, and construction (see Vladimir Karaj, *"Si 'përfitimet strategjike' nga qeveria po rrezikojnë lirinë e medias në Shqipëri," Reporter.al*, 12 August 2025, https://www.reporter.al/2025/08/12/si-perfitimet-strategjike-nga-qeveria-po-rrezikojne-lirine-e-medias-ne-shqiperi/).

[9] Institute for Media and Communication (INA). (2024, October 15). *Concentration of media ownership, which controls the majority of the audience, makes journalists' work more difficult*. INA Media. https://ina.media/en/2024/10/15/perqendrimi-i-pronesise-se-medias-qe-zoteron-shumicen-e-audiences-veshtireson-punen-e-gazetareve/.

[10] The audience concentration figures reported by BIRN are based on data collected for one week per year. While this is currently the most comprehensive and publicly available measurement of media concentration in Albania, the limited timeframe should be kept in mind when interpreting the results.

[11] European Commission, Albania, 2024, *cit.*, p. 37.

[12] European Commission, Albania, 2024, *cit.*, p. 37.

the resignation of Alfred Peza in September 2024, the Albanian Parliament appointed journalist Eni Vasili as Director General of RTSH in April 2025, the first woman to hold this post. Vasili's appointment is expected to lead to a more independent public broadcaster. Nevertheless, the system of parliamentary appointments continues to leave scope for political influence.[13]

Opacity of financing sources is another systemic weakness. While Albanian law requires some disclosure of company ownership, this applies only to audiovisual and print media, leaving online outlets outside transparency rules.[14] Even where disclosure is mandated, enforcement remains weak and fragmented.

Public funding for the media represents a particularly sensitive channel of influence. The legal framework lacks clear, transparent criteria for allocation, and implementation is opaque. Sub-contracting practices allow authorities to bypass competitive procurement, channelling public funds to politically aligned outlets.[15] This distorts the market and entrenches clientelist ties. Broader financial opacity extends to the absence of clear disclosure rules for economic interests, funding sources, foreign investment and ownership structures. Combined with high levels of informality in Albania's economy[16], this opacity undermines trust in the media sector and prevents audiences from knowing who ultimately controls their news sources.

Journalists' precarious working conditions further compound these vulnerabilities. The European Commission documented "limited job security and poor working conditions for journalists,"[17] including unpaid salaries, unpaid overtime, mandatory holiday work and wrongful terminations. Between June 2023 and June 2024, more than 140 journalists and media workers were laid off at the public broadcaster alone.[18] The State Labour Inspectorate confirmed breaches of labour and social insurance laws, issuing formal warnings to RTSH.[19]

Such precarities fuel self-censorship. Young journalists, women, and local reporters are particularly exposed to exploitation and intimidation. With limited financial and human resources, and in the absence of robust unions or professional protections, journalists lack the means to resist pressure from political and business actors. Although self-regulatory initiatives such as the Alliance for Ethical Journalism exist, their impact is constrained by polarisation and resource scarcity. Without systemic reforms, self-regulation cannot offset these structural vulnerabilities.

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[13] Albanian Radio and Television (RTSH) in Dragomir, M. (2025). *State Media Monitor Global Dataset 2025*. Media and Journalism Research Center (MJRC). https://statemediamonitor.com/2025/09/radio-televizioni-shqiptar-rtsh/.
[14] European Commission, Albania, 2024, *cit.*, p. 38.
[15] European Commission, Albania, 2024, *cit.*, p. 38.
[16] European Commission, Albania, 2024, *cit.*, pp. 52-53.
[17] European Commission, Albania, 2024, *cit.*, p. 38.
[18] European Commission, Albania, 2024, *cit.*, p. 38.
[19] European Commission, Albania, 2024, *cit.*, p. 38.

2.3 A Regional Risk Map

The challenges facing Albania's media landscape are not unique. The 2024 European Commission reports for the Western Balkans reveal a common pattern of systemic risks that undermine media freedom and pluralism across the region.

North Macedonia continues to struggle with concentrated ownership and weak disclosure practices, while Bosnia and Herzegovina has yet to adopt a law on ownership transparency. Serbia's problem is somewhat different: the sheer number of outlets competing in a small market makes them heavily dependent on political and commercial patrons, creating structural vulnerability to capture. Montenegro, unlike its neighbours, has updated its legislation aimed at solving the ownership-transparency problems, but financial opacity remains due to weak enforcement of rules governing the use of public funds in the media sector.

Political and business overlaps are another recurring feature. In North Macedonia and Bosnia and Herzegovina, the Commission highlights the use of state advertising without transparent criteria, warning of the risks of political manipulation. Serbia is repeatedly flagged for the influence of political and economic actors on editorial content, particularly within public service broadcasting. Montenegro has legislated greater transparency in public funding, but without effective monitoring, these rules have had limited impact.

Concerns over the independence of regulators and public service broadcasters also run through all country reports, albeit with different intensity. In Serbia, the Commission openly questions the independence of the regulator and documents biased PSB coverage during elections. Bosnia and Herzegovina faces fragmented oversight, which is a structural problem rooted in its complex political system. North Macedonia is criticised less for regulatory capture and more for the persistence of political pressures and limited editorial independence. In Montenegro, the Commission raises broad concerns about media independence, though without identifying direct institutional capture of regulators.

Journalists' precarious working conditions are another cross-cutting problem. Across the region, reporters operate under fragile contracts with little social protection. Under-resourced newsrooms and structural weaknesses leave them without adequate safeguards against pressure and exploitation.

The overall picture is one of regional convergence around a set of systemic risks: concentrated ownership, unclear financing (especially via state advertising and other forms of public funding), politicised regulation, and weak labour rights. These risks not only endanger individual journalists but also corrode the institutional foundations of media pluralism.

Yet, this convergence is not only a problem but also an opportunity. Because the risks are regional and systemic, remedies can be aligned with common European standards. The newly introduced EMFA provides precisely such a framework, with provisions on ownership transparency, fair allocation of state advertising, and the independence of regulators and public service media (see 4. Media Ownership Transparency: Current Practice vs. European Standards). By tying progress in these areas to accession benchmarks and the disbursement of IPA funds[20], the European Union has the leverage to drive reforms that can strengthen media systems across the Western Balkans.

Media in Western Balkans: Overview of Key Risks

Country	Ownership Concentration & Transparency	Political–Business Overlaps & State Advertising	Regulator & PSB Independence	Labour Protections
Albania	High concentration; online media outside ownership rules; major business groups expanding media stakes	Strong political–business ties; no clear criteria for public advertising; subcontracting bypasses competition	AMA regulator appointments vulnerable to politicisation	Precarious conditions; unpaid wages/overtime; mass layoffs at PSB
Bosnia & Herzegovina	EC recommends adoption of ownership-transparency law	EC recommends adopting criteria for public advertising	Exposed to political influence	Structural vulnerabilities; low resources
Montenegro	No highlights on ownership transparency gaps	Legal provisions for public funding transparency, but weak implementation	Concerns persist about media independence, but regulator/PSB capture not explicitly flagged	Labour precarity persists; limited unionisation
North Macedonia	Concentration risks; weak transparency of ownership	State funds used for political advertising with limited transparency	The report does not describe regulators as structurally weakened	Labour precarity noted but less detailed
Serbia	Many outlets in small ad market, leading to financial dependence	Political/economic influence over media; distortions in PSB coverage	Regulator's independence questioned; PSB bias during elections	Precarious contracts and weak bargaining

Source: Summary by Media and Journalism Research Center based on data from EC 2024 reports.[21]

[20] See more at https://enlargement.ec.europa.eu/enlargement-policy/overview-instrument-pre-accession-assistance_en.

[21] European Commission. (2024). *Bosnia and Herzegovina 2024 report*. Directorate-General for Neighbourhood and Enlargement Negotiations. https://enlargement.ec.europa.eu/document/download/451db011-6779-40ea-b34b-a0eeda451746_en?filename=Bosnia+and+Herzegovina+Report+2024.pdf; European Commission. (2024). *Montenegro 2024 report*. Directorate-General for Neighbourhood and Enlargement Negotiations. https://enlargement.ec.europa.eu/document/download/a41cf419-5473-4659-a3f3-af4bc8ed243b_en?filename=Montenegro+Report+2024.pdf; European Commission. (2024). *North Macedonia 2024 report*. Directorate-General for Neighbourhood and Enlargement Negotiations. https://enlargement.ec.europa.eu/document/download/5f0c9185-ce46-46fc-bf44-82318ab47e88_en?filename=North+Macedonia+Report+2024.pdf; European Commission. (2024). *Serbia 2024 report*. Directorate-General for Neighbourhood and Enlargement Negotiations. https://enlargement.ec.europa.eu/document/download/3c8c2d7f-bff7-44eb-b868-414730cc5902_en?filename=Serbia+Report+2024.pdf

3. Legal and Institutional Framework on the Media

Albania's media system is formally defined by a series of laws and institutions, yet in practice it functions in an environment of weak enforcement, political influence and pervasive informality. Oversight bodies exist but their independence is contested, and judicial enforcement is inconsistent. The result is a sector formally governed by institutions but substantively undermined by poor transparency, politicisation and fragile protections.

The central piece of legislation is Law No. 97/2013 on Audiovisual Media. It defines audiovisual media service providers as natural or legal persons with editorial responsibility for content and its organisation.[22] The law regulates licensing, advertising limits, quotas for European works and obligations to protect minors. Amendments in 2016 and 2023 reshaped provisions in ways that favoured market incumbents. As one analysis observes, "the legislation does not address cross-ownership, since there is no regulation of online media, while print media are regulated with two very general articles on media freedom, and no further rules are established."[23]

The Law on the Right to Information is also relevant, requiring institutions to provide public access to documents. In practice, however, compliance is uneven: officials often invoke commercial secrecy to withhold contracts or tenders.[24] Moreover, while the law provides a formal framework for requesting and obtaining information, institutions frequently exploit the maximum response timeframe or deliver data in formats that are difficult to use, delaying journalistic reporting and undermining news timeliness.[25] These practices have led journalists to increasingly rely on alternative, often unofficial, sources. Civil society groups, media associations, and international press freedom organizations have also voiced concerns over the Albanian Government's 2021 decision to centralize public communication under the Media and Information Agency (MIA). Critics argue that this structure restricts access to information and consolidates government control over the flow of public information.[26]

Secondary legislation issued by the AMA covers licensing, advertising quotas and sponsorship, but AMA's jurisdiction does not extend to print or online outlets.[5] The AMA itself is the central regulator, responsible for licensing, frequency allocation and content monitoring. It also maintains a widely cited database of audiovisual ownership. Yet its

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[22] Republic of Albania. (2013). *Law no. 97/2013 on the Audiovisual Media in the Republic of Albania*. Audiovisual Media Authority, p. 3. https://ama.gov.al/wp-content/uploads/2020/07/Law-no.-97-2013-on-the-Audiovisual-Media-in-the-Republic-of-Albania.pdf.

[23] Londo, I. 2025, *cit*.

[24] Londo, 2025, *cit.*, pp. 26-27.

[25] Bino, B. (2023). *Albania – Indicators on the Level of Media Freedom and Journalists' Safety Index 2023*. p. 22. https://safejournalists.net/wp-content/uploads/2024/10/ALB-ENG-2024.pdf.

[26] IJAS. SafeJournalists Network Monitors Albanian Government Roadmap Addressing Safety of Journalists. 3 November 2023. https://safejournalists.net/alert/safe-journalists-network-monitors-albanian-government-roadmap-addressing-safety-of-journalists/; Taylor, A. Albanian 'Ministry of Propaganda': Where we are today?. 5 May 2022. https://www.mfrr.eu/albanian-ministry-of-propaganda-where-we-are-today/; Matlija, D.; Dule, I., & Qershori, B.. (2024). *E Drejta e Informimit 2023: Ndryshimet ligjore për të drejtën e informimit – Shumë zhurmë për asgjë?* Qendra "Res Publica". https://www.respublica.org.al/wp-content/uploads/2024/04/E-drejta-e-informimit-2023_Web.pdf

independence is fragile: board members are appointed by parliament, leaving its decisions vulnerable to political majorities.[27]

The public service broadcaster RTSH is another institutional pillar. With a 2023 budget of roughly €21 million, 29% of it from the state budget, it holds significant financial weight.[28] Yet its independence has many times been compromised in the past by politically influenced appointments to its Supervisory Council and the Director General position.[29]

Self-regulation is represented by the Albanian Media Council and the Alliance for Ethical Media. The latter now includes more than 30 outlets and has been handling a growing number of complaints, which rose from 31 in 2021 to 67 in 2023, which is a sign of increased awareness of these mechanisms.[30] This organisation mainly covers online media.

Advertising transparency is another blind spot. The AMA monitors advertising volumes but not revenues. Public funding for the media is frequently channelled through subcontractors, obscuring the final beneficiaries.

Civil society organizations, including professional associations and trade unions, play an increasingly important role in compensating for institutional weaknesses in Albania's media sector. Journalists and media professionals enjoy, to a large extent, the freedom to organise through unions and associations. These include the Union of Albanian Journalists (UGSH)[31], the oldest and largest, with branches in 12 districts, though it functions more as an association than a formal trade union; the Association of Professional Journalists of Albania (APJA)[32], affiliated with the European Federation of Journalists (EFJ); the Association of Journalists of Albania (AGSH)[33], established in 2024 and also affiliated with the EFJ; and the Albanian section of the Association of European Journalists (AEJ Albania).[34] In addition, a new trade union, the Union of Journalists and Media Professionals of Albania (SGPM)[35] was founded in autumn 2024 to represent labour rights and collective interests in the sector, while a Network of Women Journalists was also launched the same year[36], aiming to strengthen gender representation and solidarity among professionals.

The Center for Science and Innovation for Development (SCiDEV), a Tirana-based think tank, has been active in defending media freedom and shaping public debate through

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[27] European Commission, Albania, 2024, *cit.*, p. 37.
[28] RTSH. (2024). Raporti vjetor 2023. RTSH. Retrieved on 13 September 2025 from https://kuvendiwebfiles.blob.core.windows.net/webfiles/202406031108528162Raporti%20i%20veprimtarisë%20së%20punës%20RTSH%202023%20.pdf.
[29] Bino, B.; Shehaj, I., & Elmasllari, D. (2024). *Albania's Public Broadcaster RTSH: Director Selection Controversy – A Brief Analysis.* SCiDEV, Tirana. https://scidevcenter.org/wp-content/uploads/2025/02/SCiDEV-Abalysis-about-RTSH-Situation.pdf
[30] Londo, 2025, *cit.*, p. 10.
[31] See more at https://www.facebook.com/UnionilGazetareveShqiptare.
[32] See more at https://www.facebook.com/p/Shoqata-Gazetarët-Profesionistë-të-Shqipërisë-APJ-Albania-100069907973361/.
[33] See more at https://agsh.al/.
[34] See more at https://aej.org/about-the-association-of-european-journalists-aej/.
[35] See more at https://www.sgpm.al.
[36] See more at https://www.facebook.com/profile.php?id=61566115200716.

research, advocacy and timely public statements.[37] Moreover, SCiDEV has emerged as a key knowledge and capacity-building actor, serving as the local resource partner for the SafeJournalists Network[38], facilitating regional cooperation on journalist safety, working conditions, and media rights. Watchdog groups such as BIRN Albania[39] provide vital datasets on ownership and concentration, helping to improve sectoral transparency.

4. Media Ownership Transparency: Current Practice vs European Standards

4.1 What EMFA/AVMSD Require

The European Union has gradually built a legal framework to safeguard media pluralism and ownership transparency, beginning with the Audiovisual Media Services Directive (AVMSD), first adopted in 2010 and amended in 2018, and culminating in the European Media Freedom Act (EMFA), which was adopted in May 2024 and took effect in August 2025. Together, these instruments set out comprehensive standards for ownership disclosure, financing transparency, regulator independence and the governance of public service media.

The AVMSD requires Member States to ensure that audiovisual media services, both television and on-demand, comply with basic standards on licensing, protection of minors, advertising and impartiality. It encourages ownership transparency but leaves implementation largely to national discretion.

The EMFA marks a decisive strengthening of EU-level oversight. It transforms soft obligations into binding rules, extending transparency requirements across all media sectors while introducing independent European monitoring through the European Board for Media Services (EBMS).

EMFA is the most ambitious EU attempt yet to "capture-proof" media systems as it directly targets the four areas most prone to capture: regulator independence, public service media independence, misuse of state funds and lack of ownership transparency, according to the Media Capture Monitoring Report (MCMR)[40]:

Independence of media regulators: Building on AVMSD Article 30, EMFA requires regulators to be legally and functionally independent, adequately resourced and shielded from political appointments. Regulators must follow transparent decision-making procedures, publish rulings and provide for appeals. The EBMS will monitor compliance.

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[37] See more at https://scidevcenter.org/.
[38] See more at https://safejournalists.net.
[39] Londo, 2025, *cit.*, pp. 9-10.
[40] Detreköi, Z., & Dragomir, M. (2025). *Media Capture Monitoring Report: Overview*. International Press Institute & Media and Journalism Research Center. https://journalismresearch.org/wp-content/uploads/2025/02/Media-Capture-Monitoring-Report-Overview.pdf.

Independence of public service media (PSM): Article 5 of EMFA guarantees PSM autonomy, with transparent, non-discriminatory board appointments and sustainable, predictable funding insulated from political pressure. The MCMR stresses that PSM organisations are particularly vulnerable to capture due to their proximity to the state.[41]
Misuse of state funds: Article 25 imposes strict transparency obligations on state advertising (and other forms of public funds) and service contracts. Governments and state-owned companies must disclose annual allocations to each media outlet, based on transparent and proportionate criteria. The MCMR identifies state advertising as one of Europe's most effective tools of political capture.[42]
Ownership transparency and pluralism: Articles 6 and 22 impose new rules. Article 6 requires disclosure of direct, indirect and beneficial owners, including state stakes, income from state advertising, and conflicts of interest. Information must be consolidated in a public database overseen by regulators. Article 22 introduces a pluralism test for cases of ownership concentration, requiring assessment not only under competition law but also for impact on concept that may include editorial independence and diversity.

Taken together, these provisions aim to ensure transparency in ownership and financing while addressing structural risks of capture, politicisation, and oligarchic concentration. Yet EMFA's effectiveness will depend on implementation: governments with poor media freedom records may comply formally while undermining independence in practice.[43] Without robust monitoring and political will, EMFA risks remaining "fine print" rather than a transformative safeguard.

4.2 Albania Today: Transparency Alone Is Not Sufficient

Albania has made important progress toward ownership transparency, most notably through the creation of the AMA registry, which makes information about the owners of licensed broadcasters publicly available. This is a meaningful step forward, as it provides the first systematic overview of who controls the main television and radio outlets in the country.

However, current disclosure falls short of ensuring pluralism. Transparency must extend beyond names to include financial data such as funding sources, revenues, and links to other business interests. Without this deeper disclosure, regulators cannot assess market dominance or the influence of non-media actors on editorial agendas. Importantly, the registry does not include print and online outlets, leaving hundreds of media portals outside any disclosure requirement. Expanding the framework would require a new law, as AMA has no mandate to regulate online media.

Cross-ownership regulation is another major gap. Albania has no restrictions preventing conglomerates from owning outlets across television, print, and digital. Amendments to the Audiovisual Media Law in 2016 even relaxed earlier limits, enabling further consolidation during the digital switchover process. Today, a handful of families

[41] Detreköi & Dragomir, 2025, *cit.*, p. 7.
[42] Detreköi & Dragomir, 2025, *cit.*, pp. 7-8.
[43] Detreköi & Dragomir, 2025, *cit.*, pp. 8-9.

dominate the market: the Frangaj family (Klan Group), the Hoxha family (Top Media), the Dulaku family (Vizion Plus), the Hysenbelliu family (Focus Group), and Carlo Bollino (Multimedia Group). These conglomerates extend their influence across platforms and into sectors such as construction, banking, and energy. Collecting and publishing systematic information about their cross-sector ties and political affiliations is essential to assess risks of capture.

Audience data are another area where Albania falls short. Reliable and transparent audience data are indispensable for assessing media pluralism, since they show not just who owns outlets but who actually reaches the public. Yet in Albania, audience measurement has only recently been introduced by broadcasters themselves, and the process was widely questioned for its methodology and credibility. Without consistent, public audience figures, policymakers and regulators cannot evaluate how concentrated the market is in practice. This is expected to change as AMA has recently commissioned a privately owned company to conduct audience research for the entire Albanian industry.[44]

The same is true for advertising data, where even basic figures are contested and little is known about how much revenue flows to online outlets. For a sector increasingly shaped by digital platforms, this lack of transparency is especially damaging.

Finally, public funding for the media, including advertising spending, highlights the weaknesses of the current system. Albania has no formal subsidy scheme, but ministries, municipalities and state-owned companies distribute advertising and project-based funding through intermediaries. This system lacks transparency, is fragmented and is vulnerable to clientelist allocation. As the Our Media study concludes, “the legislation and mechanisms in place for allotting public funding to media do not allow for a good analysis and solid conclusion regarding this process.”[45]

This landscape shows that transparency alone is insufficient. Albania has taken a positive first step by introducing the AMA registry, but the lack of comprehensive disclosure obligations, cross-ownership rules, reliable audience and advertising data, and transparent state funding practices all mean that the risks of capture and oligarchisation remain high. Transparency is a necessary condition for reform, but without accompanying rules to prevent dominance and ensure fair funding and regulatory independence, it cannot deliver real pluralism.

4.3 Gap Analysis Matrix

Albania’s misalignment with EMFA is not partial but systemic. The country falls short in several core areas, leaving major vulnerabilities in place, some of which have been described before.

[44] Interview with Armela Krasniqi, chairperson of AMA.
[45] Londo, 2025, *cit.*, p. 17.

Critical gaps appear in three domains: ownership disclosure, financial transparency and cross-ownership safeguards. The AMA registry is a step forward for audiovisual media, but it excludes print and online outlets and does not cover beneficial ownership or funding sources. This leaves hidden networks of influence untouched. Media companies are not required to publish revenues or reveal their main sources of income, while public funding for the media continues to be channelled through non-transparent intermediaries, cutting the public and regulators off from knowing who really finances the sector. On top of this, Albania has no rules on cross-ownership. As a result, five conglomerates, as mentioned above, dominate the market, extending their reach across television, print and online while maintaining close political ties.

Some gaps concern the independence of the public service broadcaster (RTSH) and the regulator (AMA). On paper, provisions for their independence are in place and, in principle, these institutions at least in recent years have safeguarded pluralism. In practice, however, their governance frameworks remain exposed to political influence through parliamentary appointment procedures and resource dependencies. AMA's independence is defined in law but is institutionally fragile, as its leadership depends on parliamentary majorities. Depoliticising appointment procedures and funding systems would bring AMA closer to EMFA standards.

Moderate gaps emerge in relation to audience and market data. While EMFA does not formally oblige Member States to publish such data, its pluralism test under Article 22 depends on reliable information about audience shares and market revenues. In Albania, there are no reliable audience data and advertising figures are equally opaque. Without credible and transparent figures, regulators have no reliable way to track concentration or detect capture.

In short, AMA's efforts towards boosting transparency are a useful first step, but that is not sufficient. The wider picture is one of capture-enabled opacity. Closing these gaps will require more than incremental fixes: Albania needs a new, comprehensive media law that extends ownership and funding transparency across all sectors, introduces meaningful cross-ownership limits, ensures fair and transparent allocation of state funds, and depoliticises the governance of both regulators and public service media. Transparency is necessary, but without enforceable protections, Albania's media will remain exposed to oligarchisation and political control. (*see more below under 4.4 Risks in Practice*)

Alignment of Albania's Media Framework with EMFA/AVMSD Standards: Gap Assessment

Area	EMFA/AVMSD Standard	Albania Today	Gap	EMFA Status
Ownership disclosure	Full disclosure of direct, indirect, and beneficial owners in a public register covering all media sectors (Arts. 6 & 22 EMFA)	AMA registry covers audiovisual only; print/online excluded; beneficial ownership hidden; AMA lacks mandate over portals	**Critical gap:** no universal disclosure; no beneficial ownership data; new law required	Explicit EMFA obligation

Financial transparency	Disclosure of revenue sources, including public funding for the media, subsidies, and private investors (Arts. 6 & 25 EMFA)	No obligation to publish financial reports; funding sources opaque; public funding for the media often routed via intermediaries	**Critical gap:** regulators lack financial data to assess market influence	Explicit EMFA obligation
Media pluralism safeguards (cross-ownership)	Regulators must assess mergers and cross-ownership for impact on pluralism and editorial independence (Art. 22 EMFA)	No cross-ownership rules; restrictions relaxed in 2016; five conglomerates dominate, with close political ties	**Critical gap:** no legal tools to prevent oligarchisation or political capture	Explicit EMFA obligation
Audience and market data	EMFA requires pluralism assessments (Art. 22) → credible audience/revenue data implied but not mandated	Audience measurement privately managed; methodology contested; results not public; ad market data unreliable	**Moderate gap:** no credible, public data; undermines pluralism monitoring	Implied requirement (not explicit)
Public funding transparency	Public funding for the media allocated by transparent, objective, proportionate criteria; annual disclosure of amounts per outlet (Art. 25 EMFA)	Distribution opaque; funds routed via agencies; ministries and SOEs use non-transparent criteria	**Critical gap:** high risk of clientelism; no transparency of state funds	Explicit EMFA obligation
Public service media independence	Transparent, merit-based appointments; secure, multi-annual funding frameworks (Art. 5 EMFA)	RTSH appointments open to politicisation; Director General and Supervisory Council shaped by parliamentary majorities; one-third of budget from state	**Major gap:** framework exists but undermined by political capture	Explicit EMFA obligation
Regulator independence	Regulator must be legally and functionally independent; transparent appointments; adequate resources; peer oversight (Art. 30 EMFA & AVMSD)	AMA appointments open to politicisation; dependent on parliamentary majority; weak enforcement capacity	**Major gap:** regulator exists but its autonomy and credibility are vulnerable because of politicisation risks	Explicit EMFA obligation

Note on Gap Classification: **Critical gap** – where no effective legal framework exists, or existing measures are wholly inadequate to meet EMFA standards. These are areas where reform is urgent and foundational (e.g., ownership disclosure, funding transparency, cross-ownership safeguards); **Major gap** – where institutions or rules exist but are compromised in practice due to political influence, weak enforcement, or structural flaws. Significant reforms are needed to align with EMFA (e.g., regulator and PSM independence); **Moderate gap** – where partial measures exist but lack reliability, consistency, or public accessibility. These shortcomings weaken monitoring and pluralism assessments but could be corrected with targeted reforms (e.g., audience and market data).
Source: Marius Dragomir and Media and Journalism Research Center

4.4 Risks in Practice

The systemic gaps between Albania's current framework and the standards set out in the EMFA are not abstract or technical; they translate directly into risks that have already materialised in practice. The most visible and entrenched of these is the oligarchisation of the media market.

As discussed earlier in the report, Albania's audiovisual sector is dominated by a handful of family-owned conglomerates. This concentration would be problematic in any context, but in Albania it is magnified by the fact that these conglomerates also hold significant interests in non-media industries such as construction, banking, telecommunications and energy.

The absence of cross-ownership regulation has enabled these conglomerates to extend their reach across platforms. Dominance in television quickly spills over into radio, print and digital, further reinforcing their power to shape public discourse. Because Albania has no mechanism to assess the impact of such concentration on pluralism, this media capture has gone unchecked. The result is a closed ecosystem in which a small circle of owners controls both information and influence.

This concentration directly affects the quality of information. According to a 2023 report issued by the Center for the Study of Democracy and Governance, "pressure and control over media and journalists are also one of the ways used by individuals with financial power to manipulate activities as well as their connections with politics. To achieve this goal, various forms were used, which included not only the corruption of certain individuals in the world of media and the press, but also the offering of other favours with economic benefits."[46]

Disinformation also thrives in this environment. Online portals, which operate outside any registration or ownership disclosure requirements, can be created and abandoned overnight. Many conceal their ownership and sources of funding, making them ideal vehicles for politically sponsored content, covert advertising, and disinformation campaigns. In principle, self-regulation could offer an answer to these challenges. However, self-regulation and integrity in Albania's online media remain undermined by the corrupt and informal networks that shape the country's media ecosystem. Anonymous and unaccountable portals are sustained by financial lifelines from political actors, business interests, and, in some cases, organised crime networks.[47] These actors use media platforms as instruments of pressure, reputation blackmail, and disinformation, while ethical journalism is increasingly marginalized. This opacity leads to "ethical problems and dubious professional practices," eroding trust in the digital news ecosystem.[48] Without obligations for ownership or funding transparency, and without

[46] Hallunaj, M. (2023, January). *Oligarchic Tendences in Albania and the Need for a De-Oligarchization Process: An Attempt to Assess and Measure the Concentration of Economic and Political Power* (Policy Paper No. 3), p. 21. Center for the Study of Democracy and Governance. https://csdgalbania.org/wp-content/uploads/2023/03/Policy-Paper-3-FINAL-ENG.pdf

[47] Source: Blerjana Bino, executive director SCiDEV (interview and written feedback).

[48] Londo, 2025, *cit.,* p. 4.

cutting the financial lifelines that sustain unethical media, there are no effective tools to hold such outlets accountable or make self-regulation function as intended.[49]

The misuse of public funding for the media compounds these risks. Instead of serving as a neutral source of funding for diverse media, public money is often channelled through opaque intermediaries and distributed according to political loyalty. Across the Balkans, state advertising (and other forms of public financing) is used by governments as an effective instrument to control editorial lines without direct censorship: by rewarding compliant outlets and starving critical ones, state institutions indirectly but decisively shape the information environment.

The cumulative effect of these dynamics is a media system that reflects Albania's wider oligarchic political economy. Media owners use their outlets less as viable businesses than as bargaining chips in negotiations with the state. Politicians, in turn, rely on captured media to maintain dominance and control narratives. Journalists, working in precarious conditions, have little protection from editorial interference or political pressure. Yet the reverse dynamic is also visible: some journalists, shaped by the same corrupt environment, have been increasingly replicating on a smaller scale the coercive practices of their employers or political patrons. Audiences ultimately receive information filtered through the interests of powerful businessmen and politicians, leaving limited space for genuinely independent voices.

5. International Standards and European Approaches

5.1 Standards

Across Europe, there are several normative pillars that shape today's approach to media ownership and pluralism.

One is provided by the Council of Europe (CoE), which sets out the core architecture. Recommendation CM/Rec(2007)2 urges member states to curb the influence of any single owner, setting objective thresholds, such as audience share, circulation, turnover/revenue and capital/voting rights, while empowering regulators to refuse licences, impose remedies and, where necessary, order divestiture to protect pluralism.[50]

Recommendation CM/Rec(2018)1 advances this framework by requiring full ownership transparency (including disclosure of beneficial owners and forms of direct or indirect control) and by highlighting the structural role of public service media (PSM) and

[49] Bino, *cit*.
[50] Council of Europe. (2007). *Recommendation CM/Rec(2007)2 on media pluralism and diversity of media content*. Available here.

community media as counterweights to concentration. It also calls for funding tools to sustain independent, high-quality journalism (Council of Europe, 2018).[51]

The two-tiered OSCE framework plays an equally important standard-setting role. The Copenhagen Document (1990) codifies freedom of expression and the commitment to pluralistic public debate as essential to democratic elections[52], but it does not itself set ownership-disclosure rules. Those developed later through guidance from the Representative on Freedom of the Media (RFoM), ministerial decisions and joint declarations. These instruments call for comprehensive ownership transparency, measures against excessive concentration, genuinely independent regulators and targeted support for pluralism (including local and community media). For example, the 2018 Ministerial Decision on the Safety of Journalists reaffirmed the OSCE's pluralistic media commitments[53], while RFoM communiqués and joint declarations have urged states to ensure direct disclosure of ownership to the public alongside mandatory filings with independent national regulators.[54]

Finally, the EMFA complements these standards by embedding transparency obligations across all media services. It requires accessible disclosure of direct, indirect and beneficial owners, as well as information on state-advertising receipts; introduces pluralism-impact assessments in the context of concentration of ownership cases; and calls for transparent audience-measurement systems. These provisions reinforce and operationalise the broader commitments set out by the Council of Europe and OSCE *(see section 4.1 on What EMFA/AVMSD Requires)*.

5.2 European Approaches to Ensuring Media Pluralism

Germany (KEK): Audience-share thresholds anchored in law

Germany's media system is overseen by the Commission on Concentration in the Media (KEK), which works to protect diversity of opinion in nationwide television.[55] Its core is an audience-share model: annual TV audience share is the decisive indicator of whether a dominant influence on public opinion exists.[56] Articles 60–68 and 120 of the Interstate Media Treaty (Medienstaatsvertrag, MStV)[57] allow companies to broadcast multiple nationwide TV services so long as this does not result in dominant opinion-forming power. Dominance is presumed at a 30% annual average TV audience share, with a secondary trigger at 25% if the company holds a dominant position in another relevant media market or if a cross-media assessment shows equivalent influence. "Bonus

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[51] Council of Europe. (2018). *Recommendation CM/Rec(2018)1 on media pluralism and transparency of media ownership*. Available here.
[52] OSCE. (1990). *Copenhagen Document*. https://www.osce.org/files/f/documents/d/7/19394.pdf
[53] OSCE Ministerial Council. (2018). *Decision No. 3/18—Safety of Journalists*. https://www.osce.org/files/mcdec0003%20safety%20of%20journalists%20en.pdf.
[54] RFoM & partners. (2023). *Joint Declaration on Media Freedom and Democracy*. https://www.osce.org/files/f/documents/3/2/542676.pdf
[55] See more at https://www.kek-online.de/en/about-us/.
[56] See more at https://www.kek-online.de/en/media-concentration-monitoring/.
[57] Die Medienanstalten. (2020). *Interstate Media Treaty (Medienstaatsvertrag, MStV)*. https://www.die-medienanstalten.de/fileadmin/user_upload/Rechtsgrundlagen/Gesetze_Staatsvertraege/Interstate_Media_Treaty_en.pdf

regulations" allow deductions from the calculated share where regional windows or third-party programming are carried, thus protecting diversity. Attribution rules prevent circumvention: §62 MStV attributes audience shares to entities with at least 25% direct (or qualifying indirect) holdings, as well as to situations of comparable influence established through contracts or control over programming decisions.

France (ARCOM): Structural-plus-content model

France employs a hybrid model combining structural ownership caps with cross-media limits and content-based oversight. The audiovisual regulator ARCOM implements the 1986 Broadcasting Act[58] and manages licensing through public calls for applications under Article 30-1, binding licensees through "conventions" that encode pluralism obligations.[59] The law (articles 35-38) bans nominee shareholding (*prête-nom*), requires nominative shares, and obliges licensees to notify ARCOM of capital changes. Beneficial ownership must also be registered in the national RBE database under AML rules. Specific limits prevent dominance: no single entity may hold more than 49% of the capital or voting rights of a national DTT TV channel with more than 8% average annual audience share. If an entity already controls such a channel, it may not hold more than 33% of a local TV channel. A single operator cannot hold more than seven national TV authorisations. Cross-ownership provisions further restrict concentration by preventing applicants from holding dominant positions simultaneously across TV, radio and the daily press. When mergers occur, the Autorité de la concurrence leads competition review while ARCOM provides a pluralism opinion under Article 41-4 of the 1986 law.[60] The 2022 TF1/M6 merger case illustrates how ARCOM's pluralism assessment complements antitrust review.[61] In July 2024, ARCOM strengthened monitoring of pluralism obligations, particularly for 24-hour news channels, a change welcomed by media freedom NGOs.[62] In July 2025, the Conseil d'État clarified ARCOM's duty to ensure no "clear and lasting imbalance" in the expression of diverse opinions in programming, especially news and information.[63]

Italy (AGCOM): The SIC cross-media yardstick and new "significant market power" test

Italy's regulator AGCOM applies the *Sistema Integrato delle Comunicazioni* (SIC), a cross-media metric covering press, news agencies, electronic publishing (including

[58] Conseil supérieur de l'audiovisuel (CSA). (n.d.). *Le dispositif anti-concentration*. CSA. https://www.csa.fr/Proteger/Garantie-des-droits-et-libertes/Le-dispositif-anti-concentration.
[59] Loi n° 86-1067 du 30 septembre 1986 relative à la liberté de communication (Loi Léotard). (1986, September 30). Légifrance. https://www.legifrance.gouv.fr/loda/article_lc/LEGIARTI000044259353
[60] Loi n° 86-1067 du 30 septembre 1986, *cit*.
[61] Conseil supérieur de l'audiovisuel (CSA). (2021, September 21). *Instruction de l'opération de rapprochement des groupes TF1 et M6: Le CSA adresse aux acteurs concernés un questionnaire pour préparer son avis à l'Autorité de la concurrence*. https://www.arcom.fr/presse/instruction-de-loperation-de-rapprochement-des-groupes-tf1-et-m6-le-csa-adresse-aux-acteurs-concernes-un-questionnaire-pour-preparer-son-avis-lautorite-de-la-concurrence
[62] Reporters Without Borders (RSF). (2022, December 8). *France: RSF welcomes Arcom's decision to strengthen media pluralism*. RSF. https://rsf.org/en/france-rsf-welcomes-arcoms-decision-strengthen-media-pluralism.
[63] Conseil d'État. (2024, June 26). *Pluralism in television and radio: The Conseil d'État sets out the conditions under which this principle must be monitored by Arcom*. https://www.conseil-etat.fr/en/news/pluralism-in-television-and-radio-the-conseil-d-etat-sets-out-the-conditions-under-which-this-principle-must-be-monitored-by-arcom.

online), radio, audiovisual media, cinema, outdoor advertising, sponsorship, and online advertising.[64] Previously, Article 43 of the 2005 TUSMAR law imposed thresholds, barring operators from earning more than 20% of SIC revenues (or more than 10% if they also controlled 40% of electronic-communications revenues). In March 2024, this regime was replaced by Article 51 of the 2021 TUSMA law, which introduced a new "significant market power" standard harmful to pluralism. AGCOM now publishes annual SIC valuations, component market values, and evidence of dominant positions and their risks for pluralism.

Ireland (Coimisiún na Meán): Ownership and control rules linked to journalism funds

Ireland's media regulator, Coimisiún na Meán, was established in March 2023 to oversee broadcasters, VOD providers, and online platforms.[65] Its Ownership & Control Policy governs broadcasting and multiplex contracts, considering the character and track record of applicants, their beneficial owners, and compliance with statutory criteria.[66] The policy applies thresholds: ≤20% of national sound-broadcasting services is acceptable; 20–25% requires additional compliance checks; >25% is prohibited. At local level, dominance is assessed by audience share. Ireland also links ownership and control rules to public funding schemes. The regulator administers journalism funds such as the Sound & Vision Scheme, and, since 2024, Local Democracy Reporting and Courts Reporting schemes (€6m initially, with €5.7m awarded in 2025).[67] Eligibility requires regulatory compliance and ownership/control transparency, creating a strong incentive for adherence.[68]

Switzerland (OFCOM/Publicom): Measuring opinion-forming power

Switzerland has developed one of Europe's most sophisticated cross-media monitoring systems. The Media Monitor (*Medienmonitor Schweiz*), commissioned by OFCOM and run by Publicom, evaluates how much "opinion-forming power" different media brands and owners hold in the Swiss market.[69] The system does not look only at economic market share, but at the broader capacity of outlets to shape public debate. To capture this, it combines audience reach data (official studies of daily reach for TV, radio, and print, supplemented by surveys and projections for online and social media), perceived importance data (representative surveys in which users rate how important each brand is for them as a source of political and societal information), and concentration metrics (the two indicators above are integrated into an index of opinion-forming power per brand and per owner). These are then aggregated across all brands owned by the same group.

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[64] See more at https://www.agcom.it/sistema-integrato-delle-comunicazioni-sic.
[65] Broadcasting Authority of Ireland (BAI). (2023). *Annual report 2022–2023*. https://cdn.epra.org/organisations/second_documents/18/original/BAI-Annual-Report-2022_2023-Final-New.pdf?1723541589.
[66] Coimisiún na Meán (CNAM). (2024, November). *Ownership and control policy*. https://www.cnam.ie/app/uploads/2024/11/Ownership-and-Control-policy.pdf
[67] See more at https://www.cnam.ie/coimisiun-na-mean-launches-applications-for-new-journalism-schemes.
[68] See more at https://www.cnam.ie/app/uploads/2023/10/SV4_Round51_Open-Round-Guide-TV_v.Final__ENG_PC-1.pdf.
[69] See more at https://www.bakom.admin.ch/en/media-monitor-switzerland.

Finally, the results are fed into a Herfindahl–Hirschman Index (HHI) calculation, a standard competition tool, to measure overall concentration levels in the system. The outputs show how opinion-forming power is distributed across owners at national, language-region, and local levels, and whether concentration is increasing or decreasing over time. The Monitor covers around 170 media brands and nine large groups across TV, radio, print, online, and social media. Because it is cross-media and combines both quantitative reach and qualitative user assessments, it captures dimensions of influence that purely economic measures would miss. OFCOM publishes regular reports and methodological updates, making the findings transparent and usable as a policy evidence base. This allows policymakers to track risks to pluralism in real time, while giving researchers, journalists, and the public a clear picture of who shapes public opinion in Switzerland's evolving media environment.[70]

5.3 What Standards and Various Media Pluralism Approaches Tell Us

Taken together, these European practices can be integrated into a coherent monitoring system for more effective, pluralism-oriented regulation. Instead of treating ownership, competition, and public-interest support as separate debates, they can be woven into a single regulator-ready approach: a transparency spine for all media, pluralism tests that can be operationalised, and targeted support where markets fail.[71]

The first pillar is the transparency venue. A single public register covering broadcast, print, and online (with verified beneficial owners and a record of state-advertising receipts) does more than tick a compliance box. It collapses information asymmetries that have long shielded political capture and covert financing. When filings are updated and enforceable, regulators stop guessing who controls what; journalists and researchers can trace influence across platforms; advertisers and public bodies can check conflicts of interest before they spend; and the public can see who is behind the news they consume. Making access to licences, multiplex capacity, on-screen prominence, and public funds conditional on clean filings flips the incentive: in that case, transparency becomes the price of entry, not an optional extra.

The second pillar consists of pluralism tests: objective yardsticks that turn diffuse concerns about "too much power" into decisions that stand up to scrutiny. Where audience data are strong, an audience-share ceiling makes dominance easy to spot and hard to contest. Where financial accounts are better, a cross-media revenue share captures conglomerate power that slips past siloed TV or print rules. A licensing/merger test keeps pluralism in view when ownership changes hands, and a survey+reach+concentration indicator monitor tracks opinion-forming power across TV, radio, print, online, and social. Used together, these tools separate influence from noise, flag risks early, and justify proportionate remedies that can range from behavioural

[70] See more at https://www.bakom.admin.ch/en/studies-2.

[71] Building on these models and as part of its policy-focused work, the Media and Journalism Research Center has been developing a comprehensive monitoring and regulatory model to boost transparency and pluralism in the media ecosystem. This work is in progress and is expected to be published in January 2026.

commitments and content windows to divestments in extreme cases. Moreover, they can also create a learning loop: each assessment improves the data, which improves the next decision.

The third pillar is support where markets fail. Even with perfect transparency and strong tests, some forms of journalism, including local reporting, minority-language content, investigative work, courts and local-democracy coverage, will remain structurally underfunded. Public-interest media funds can be set up to target those gaps. Tying eligibility to up-to-date ownership filings and state-advertising disclosure aligns incentives: outlets that play by the rules gain access to support, those that do not are ineligible. Over time, this builds a healthier baseline of information in places and communities that commercial logic overlooks, while reinforcing the transparency culture established by the first pillar.

Examples from across Europe show how these pillars can be applied in practice. Germany's audience-share thresholds, France's combination of structural caps and content oversight, Italy's cross-media SIC yardstick, Ireland's link between ownership transparency and access to journalism funds, or Switzerland's opinion-forming power monitor all demonstrate workable models. These examples were selected because they represent well-established and strongly thought-through approaches to media regulation; however, they are by no means exhaustive. Other models, whether emerging or adapted to national specificities, can and should be considered, reflecting the diversity of regulatory traditions and institutional capacities across Europe.

Elements of each can be combined into a comprehensive and cohesive approach to media pluralism and transparency, serving both regulatory and media-literacy purposes. The key is to integrate these elements into a single framework and then adapt it to local contexts and needs. Such a system would equip regulators with both the data and the authority to make informed, proportionate decisions to protect media pluralism.

6. Recommendations

Based on the interviews with stakeholders conducted for this report and drawing on the findings of an earlier study focused on the media reform in Albania[72], the author proposes a series of recommendations focused on media transparency and pluralism. They reflect both local perspectives and European standards, particularly those set by the European Media Freedom Act (EMFA) and the Council of Europe.

6.1 Ownership Transparency (legal)

Stakeholders consistently underlined that lack of ownership transparency allows media to be used as bargaining chips by business elites with political and economic interests. Current disclosure rules in Albania apply only to audiovisual services, leaving print and

[72] Background document following the Working Group meeting on the European standards related to the independence and strengthening of media regulator in the context of Freedom of Expression held on 24 June in Tirana (internal paper).

online outlets outside the scope. To align with the EMFA, transparency obligations must cover all media services, requiring disclosure of:

- Legal and beneficial owners, including close family members and proxies (subject to privacy safeguards);
- Links to state contracts, concessions, and strategic investor status;
- Annual financial reports, including public funding received.

Legislative action should create a media-neutral transparency framework that consolidates disclosure obligations across all media sectors. Rather than establishing a mandatory licensing or registration system, such a framework should enable voluntary public registration as a transparency instrument, consistent with Council of Europe standards prohibiting prior state authorisation for media operation.

To avoid regulatory overreach, the role of the Audiovisual Media Authority (AMA) or any state entity should be confined to data coordination and verification, under independent and multi-stakeholder oversight, rather than control or authorisation functions. Most importantly, the independence of the AMA itself must be guaranteed first and foremost, eliminating any vulnerability to politicisation. Without genuine institutional autonomy, transparency mechanisms risk being captured and repurposed as tools of political pressure rather than instruments of accountability.

The registry, covering ownership and public funding, should be interoperable with existing beneficial ownership, procurement, and concession databases, ensuring disclosure of conflicts of interest. However, publication of personal or financial data must comply with privacy and data-protection rules, applying proportional disclosure requirements. Such carefully framed transparency guarantees would curb hidden influence and improve accountability while respecting freedom of expression and privacy.

6.2 Market Pluralism Safeguards (policy)

Experts interviewed for this report also highlighted that pluralism is endangered by Albania's extreme market concentration: the top broadcasters control most advertising revenues. The existing law (97/2013) imposes limited horizontal restrictions, but cross-media ownership remains unregulated, and the Constitutional Court has overturned caps on shareholdings.

Policy reforms should focus on:

- Pluralism impact assessments for all mergers and acquisitions, as mandated by EMFA Article 22. Assessments must consider editorial independence, content diversity, and cross-sector ownership links.
- Definition of "dominant position" in both audience and revenue terms, ensuring measurable thresholds. For instance, using models from other countries (e.g., 30% audience share or 20% revenue ceiling).

- Promotion of internal pluralism where external limits are politically or legally hard to enforce, e.g. requiring dominant outlets to demonstrate political and cultural diversity in programming.
- Strengthened licensing rules that condition new licences on commitments to diversity, impartiality and transparency.
- Support for alternatives: public service media with stable, independent funding, community and local media and independent investigative outlets. These actors are essential counterweights to concentration.

These measures must be proportionate and non-discriminatory, with clear appeal mechanisms to prevent selective or punitive enforcement against critical or independent media.

7. Implementation Discussion

Interviews with media professionals, regulators and civil society revealed a strong consensus that reforms must be carefully sequenced, coordinated across institutions and monitored closely. Building on these insights, the author suggests a phased implementation plan that combines legislative reform, institutional strengthening and rigorous evaluation.

Phase 1: Drafting and Consultation

Stakeholders emphasised that reform should begin with inclusive drafting and broad consultation. Steps should include: prepare a media-neutral transparency bill covering ownership, beneficial ownership and public funding for the media; draft an implementing by-law on merger impact assessments, requiring input from AMA, the competition authority and the judiciary; establish an inter-agency taskforce (AMA, Ministry of Justice, Procurement Office, CSOs, including international agencies of which Albania is a member); launch open consultations with journalists, media outlets, academia and civil society.

Phase 2: Institutional Set-up and Pilots

Interviewees said that practical tools and early pilots are essential to build credibility, hence in practice the following steps should be taken: expand the ownership and public funding for the media (including state advertising) registry; integrate it with company, concessions and procurement databases; establish AMA/Ministry procedures for identifying and registering online news media; train judiciary and regulators on EMFA standards, defamation safeguards and merger assessment methodology; conduct pilot merger assessments with international peer support.

Phase 3: Enforcement Ramp-up

Stakeholders also stressed that sustained enforcement and regular evaluations will be critical to ensure credibility: begin audits of ownership and public funding disclosures, applying sanctions where thresholds are breached; conduct a first evaluation within 18 months, adjusting thresholds, sanctions and procedures; integrate indicators into European Commission monitoring under Chapter 23 negotiations.

Indicators of Successful Implementation

Monitoring should be linked to clear, measurable indicators. They can include:

- Coverage: % of all outlets (broadcast, print, online) registered in the ownership/state funding registry
- Verification: % of outlets with beneficial owners independently verified
- Transparency: Timeliness and completeness of public funding disclosures (% of contracts published on time)
- Judicial safeguards: Median duration of defamation cases, median damages awarded, % of abusive suits dismissed early
- Journalist safety: Number of attacks recorded, clearance rates of investigations.
- Pluralism checks: Number of merger impact assessments completed and publicly reported.

Conclusions: Risks, Mitigations and Dependencies

Reforming Albania's media ownership transparency framework is not a technical exercise alone; it tests the political, institutional, and ethical resilience of the country's media system. Transparency touches the heart of entrenched interests and disrupts informal arrangements that have long sustained both political patronage and business privilege. As a result, resistance from political and economic elites is likely to remain the foremost obstacle. Those who benefit from opacity, whether through control of media outlets, clientelist access to public funding (including state advertising) or cross-sector investments have little incentive to embrace disclosure. Overcoming this resistance will require sustained political will, civil-society pressure and support from Albania's European partners, who can tie progress in transparency to broader accession benchmarks.

The second challenge concerns technical and institutional capacity and independence. Managing a unified ownership and public-funding registry demands not only legal clarity but also strong data infrastructure and inter-agency coordination. AMA needs resources, expertise, and digital tools to verify filings, connect databases, and maintain the system. Equally important is the independence of the institutions monitoring over these databases to prevent their instrumentalisation for political purposes. Only transparent oversight can ensure that disclosure mechanisms serve accountability rather than control. Proportionality must also guide implementation. Requirements should differentiate between large, politically or economically influential media groups and small, independent online outlets, podcasters, or individual content creators. Excessive or uniform obligations could unintentionally burden smaller actors and restrict pluralism. A practical mitigation is staged compliance, namely introducing obligations gradually, beginning with large audiovisual operators and extending to smaller print and online outlets as systems mature. This approach allows institutions to learn by doing, ensures proportionality in enforcement, and secures early implementation success without overwhelming capacity.

A further risk lies in data quality and verification. Transparency is only as good as the information supplied. If filings are incomplete, inaccurate or deliberately misleading, the registry becomes an archive of half-truths rather than a tool for accountability. The credibility of the system therefore depends on independent oversight and built-in audit trails. An oversight board, composed of representatives from the regulator, civil society and independent experts, could supervise data integrity, monitor enforcement and report publicly on compliance levels.

Transparency reforms will also intersect with privacy and data-protection concerns. While beneficial ownership disclosure is essential to reveal influence networks, it must be handled with care to avoid violating privacy rights or deterring legitimate investment. A balanced approach is needed, combining publishing data fields relevant to public accountability while protecting sensitive personal information. The use of sandboxing mechanisms, where regulators and privacy authorities test disclosure formats before full release, can help fine-tune the balance between openness and data protection.

Another important dependency is public and civil-society engagement. Transparency is effective only when it is used. Journalists, academics and watchdog organisations need access to the registry and the skills to interpret and analyse the data. Their involvement provides a natural check on both political influence and bureaucratic inertia. Establishing formal channels for civil society monitoring such as an annual independent review of registry use and impact would anchor transparency as a participatory, rather than merely administrative, process.

Finally, Albania's reform effort will depend on sustainable financial and technical support. Implementing interoperable databases and digital audit tools will require investment beyond domestic budgets. Here, donor-funded technical assistance can play a significant role, providing software infrastructure, training for data management and verification, and peer-learning exchanges with European regulators. International cooperation can also insulate the process from short-term political pressures by embedding it in a broader framework of European best practice.

In sum, advancing media ownership transparency in Albania is as much about governance as it is about information. The risks, political pushback, weak capacity, poor data quality and privacy conflicts are real but manageable. The mitigations, phased implementation, independent oversight, technical safeguards and civil society participation, are within reach.

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