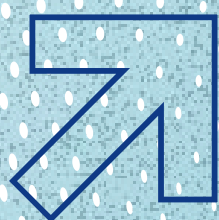


POLICY PAPER



“Protecting Human Rights in the age of Artificial Intelligence: EU & Albanian legislation approaches”



Kingdom of the Netherlands

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Disclaimer

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ACRONYMS

AHC – Albanian Helsinki Committee
AIA – Artificial Intelligence Act
AI – Artificial Intelligence
CSIRT – Computer Security Incident Response Team
DSA – Digital Services Act
EU – European Union
EU AI Act – European Union Act on Artificial Intelligence
FOI – Freedom of Information
GDPR – General Data Protection Regulation
GPAI – General-Purpose Artificial Intelligence
MIE – Ministry of Infrastructure and Energy
MoU – Memorandum of Understanding
NACS – National Authority on Cyber-Security
NAIS – National Agency for the Information Society
NIS2 – Network and Information Security Directive 2
OPC – Official Publications Center
SCiDEV – Science and Innovation for Development Center
SOP – Standard Operating Procedure

EXECUTIVE SUMMARY

The use of artificial intelligence (AI) in Albania is growing at a fast pace, becoming part of digital governance and institutional transformation. Although these developments represent an important step toward the modernisation of public administration and services, they are still taking place in the absence of a comprehensive legal, ethical, and institutional framework that fully and inclusively guarantees the protection of fundamental human rights, transparency, and public accountability. This policy document presents the first analysis of its kind in Albania, assessing the current situation, the legal and institutional framework, existing practices, and the alignment with European standards for AI governance.

AI is shaping every aspect of social life, bringing both opportunities and risks. Its use without strong legal safeguards can undermine privacy, lead to unfair data processing, algorithmic discrimination, content manipulation, or widespread citizen surveillance. In the absence of mechanisms for independent oversight, automated decision-making and the use of AI models in the public sector risk weakening the principles of the rule of law and accountability. The document emphasises that all AI development must be rooted in the protection of fundamental rights as the foundation of technological trust and democratic governance.

AI regulation in Albania remains at an early stage. The current framework relies primarily on Law No. 43/2023 “On Electronic Governance,” the Methodology of Technical Standards for the Use of Artificial Intelligence, Law No. 16/2024 “On Public Procurement,” and Law No.124/2024 “For Personal Data Protection”. These instruments offer technical guidance but not clear legal obligations, and they do not establish mechanisms for oversight, accountability, or human rights impact assessment. The AI Methodology remains an advisory document without binding force, creating the risk of legal uncertainty in the use of high-risk systems. The Draft National Artificial Intelligence Strategy 2030, which has undergone public consultation, represents the first step toward a national vision for AI development in Albania, but it is still not approved and expected to be approved in the first trimester of 2026. Meanwhile, several initiatives such as “Diella”, the e-Albania virtual assistants, and later her presentation as the AI Minister of State for Public Procurement, the use of AI for legal approximation with the EU acquis, or in managing “Smart City” projects, have been implemented without a clear legal basis and without a comprehensive risk assessment on their impact on human rights, based on the evidence available to date.

The analysis shows that although Albania has taken steps toward integrating AI into the public sector, the process is unfolding within an emerging legal and regulatory framework. The existing legal framework does not ensure full protection of human rights, while transparency and oversight of AI system deployment remain undefined. The main risk of institutionalising AI technologies without a clear legal basis and without mechanisms for transparency and accountability lies in creating conditions for misuse, including algorithmic discrimination, abuse of personal data, and surveillance.

The document proposes a set of measures for both the transitional and long-term phases of AI governance in Albania. In the short term, it calls for the adoption of a methodology for assessing the fundamental rights impact of AI systems, the introduction of transparency clauses in existing contracts, and the establishment of multi-stakeholder interinstitutional groups involving independent institutions and civil society, as well as the signing and ratification of the Council of Europe Convention regarding AI.

In the long term, the document recommends the adoption of a comprehensive and inclusive legal framework for AI, the alignment and harmonisation with the EU AI Act including provisions about the establishment of an Independent Supervisory Authority for Artificial Intelligence with inspection and sanctioning powers, the creation of a National Public Algorithm Register to ensure transparency, and the conduct of annual independent audits for high-risk AI systems in line with the EU AI Act. It also highlights the need for a National Strategy on the Future of Work in the Age of AI, to anticipate the impact of emerging technologies on the labour market and the skills required for digital transformation.

The document concludes that Albania is at a critical juncture for AI governance. Technological developments are advancing faster than the institutional capacity to understand, regulate, and oversee them. This mismatch creates tangible risks for human rights and public trust, but it also offers a significant opportunity to build a governance model grounded in the rule of law, transparency, and inclusive democracy. In this regard, Albania must establish a sustainable legal and institutional framework that ensures the use of AI is developed on the basis of human rights, ethics, and public accountability and in line with the European standards.

I. INTRODUCTION

1.1 Context

Rapid developments in the field of artificial intelligence (AI) are considerably changing the way in which governments, economies, and citizens interact with technology. AI-based systems already affect public and private decision-making, in the way services are provided, how data is processed, and how institutional communication is conducted. Their potential to enhance efficiency and drive innovation is undeniable; however, in the absence of a clear legal, regulatory, ethical, and institutional framework, as well as well-defined and enforceable standards, these developments carry serious risks for human rights, democracy, and the rule of law.

In Albania, the use of AI is expanding through its integration into governance, such as in the public procurement system.¹ However, at this stage the process is unfolding without a comprehensive legal and regulatory framework that guarantees the protection of fundamental rights, transparency, responsibility and accountability. Developments such as the “Diella” virtual assistant, the e-Albania virtual assistants, and later her presentation as the AI Minister of State for Artificial Intelligence, the use of AI for legal approximation with the EU acquis, or in managing “Smart City” projects, indicate a trend toward institutional modernisation but also reveal significant gaps in legal certainty and democratic oversight of technology.

This policy document addresses the regulation of artificial intelligence not as a purely technological matter, but as a test for the country’s institutional and democratic capacity to guarantee that the digital transformation remains at the service of man. The main purpose is to contribute to evidence-based analysis on the current state of the use of AI in Albania, vis-à-vis standards of the European Union and the Council of Europe with regard to the impact on human rights, and encourage an informed public debate on the way in which the legal and institutional architecture for the governance of AI should be constructed.

1.2 Methodological approach

The document has been prepared on the basis of a combined analytical methodology, which intertwines the analysis of documents, interviews with key actors, and freedom of information requests (FOI). The research of documents included the analysis of existing legislation, by-laws, decisions of the Council of Ministers, strategic documents and materials of public and international institutions that address AI governance. We reviewed among others Law no. 43/2023 “On Electronic Governance,” Law no. 16/2024 “On Public Procurement,” “Methodology of Technical Standards for the Use of Artificial Intelligence”, Law No. 124/2024 “Personal Data Protection” and the Draft National Strategy for Artificial Intelligence 2030.

¹ The Albanian Government is developing a new Digital Public Procurement Platform with the support of the World Bank. According to information provided by NAIS, the platform will integrate advanced artificial intelligence technologies, with the aim of enhancing transparency, efficiency, and accountability in public procurement processes.

In parallel, the research team filed freedom of information (FOI) requests to public institutions that use or develop AI technology, such as the National Agency for the Information Society (NAIS) and the Ministry of Interior, to ensure transparency on contracts, costs, risk assessments, and mechanisms for data protection. The partial responses or lack thereof illustrate the still limited level of institutional spread for the governance of AI and the need to strengthen public accountability in this field. The draft was discussed during a consultation roundtable with the participation of relevant institutions and representatives of the Parliament and was subsequently revised based on comments received from representatives of the Commissioner for the Protection of Personal Data and the Right to Information, as well as written comments submitted by NAIS.²

Moreover, the analysis is also based on guiding international documents such as the European Union Artificial Intelligence Act (AIA) and the Framework Convention of the Council of Europe for Artificial Intelligence, Human Rights, Democracy, and the Rule of Law, in order for the findings and recommendations to be aligned with European standards for digital governance and data protection.

1.3 Institutional expertise and multi-disciplinary approach

This paper is the result of cooperation between the Albanian Helsinki Committee (AHC) and the Science and Innovation for Development Center (SCiDEV), two organizations that bring complementary expertise in the fields of human rights and digital governance. AHC has a consolidated tradition in monitoring the implementation of fundamental rights and the rule of law, while SCiDEV has expertise in the legal and policy analysis of policies for digitalization, AI, and cyber-security, among others. This combination of legal and technological perspectives has enabled an in-depth analysis of interaction between innovation and responsibility, positioning the paper as a first structured contribution to the public debate on AI governance, but definitely not an exhaustive one.

Both organizations have conducted sustainable research and ongoing advocacy in the relevant fields, bringing to the analysis not only their institutional knowledge, but also the practical experience in building evidence-based policies and in open dialogue between institutions, civil society, and the professional community.

1.4 Character of the paper and the need for sustainable public debate

This paper represents the first analysis of its kind in Albania that directly links the development of AI with its implications for human rights and democratic governance. It does not aim to provide final responses, but rather to lay the foundations for an informed, inclusive, and multi-party debate on the manner of development and regulation of AI in the country. Being a first analytical initiative, the paper should be seen as a fundamental draft, which needs to be completed with

² <https://scidevcenter.org/2025/11/24/summary-of-roundtable-protecting-human-rights-in-the-age-of-artificial-intelligence-eu-and-albanian-legislation-approaches/>

empirical data, new research, and continued monitoring of institutional and technological practices in including new technologies in governance and public administration.

By means of a sustainable and transparent process, relying on cooperation with the government, independent institutions, academia, the private sector, and civil society, a credible and responsible approach to artificial intelligence governance may be built in Albania. Such a debate should serve to establish the balance between innovation and protection of fundamental rights, placing technology at the service of citizens and not vice-versa.

1.5 Structure of the paper

The paper is divided into four analytical chapters that build a clear line of arguments. The first part reviews the relationship between human rights and AI. The second part analyses the legal and institutional framework of AI in Albania, regulatory gaps, and existing practices. The third part addresses the regulation of AI systems in the European Union and the Council of Europe, with a focus on the EU AI Act and the CoE Framework Convention. The fourth part summarizes the main recommendations, divided into transitory measures and long-term measures, which aim to align the establishment of a sustainable approach to AI governance in Albania with European standards.

II. HUMAN RIGHTS AND ARTIFICIAL INTELLIGENCE

AI technologies are developing at a very fast pace, reconfiguring the manner of working, learning, and living. These technologies affect every aspect of human life, from providing and receiving public services, health care, education, transportation, to decision-making, both personal and public. The use of AI technologies enables the increased effectiveness and efficiency of governance but, at the same time, also brings along a series of challenges for human rights.³ Therefore, while institutions develop and use AI technologies, good regulation and multi-lateral supervision of the implementation of these technologies is required.

One of the greatest risks of the use of AI technologies is the violation of privacy, including the leak of data, unauthorized access, misuse of data.⁴ Moreover, the increase in the use and massive spread of AI technologies, as part of the processes of digital transformation, increases the probability of cyberattacks and, as a result, the possibility for data leaks.⁵

The violation of freedom of speech by AI technologies⁶ appears in different manners, starting from the types of information that models are fed with, the use of AI on social networks to moderate content, to the generation of *deepfake* content, which violate also other aspects of human dignity up to copyright. Their use bears real risks to democracy and the rule of law.

AI technologies may be used for the surveillance of citizens, through high resolution cameras, biometric identification, behavior monitoring on social networks, or digital persecution. Although surveillance may contribute to preventing and fighting criminality, if misused and without necessary guarantees, it might create problems for the presumption of innocence and erroneous prosecution of citizens. Moreover, surveillance brings about direct risks to privacy and the freedom of expression of citizens.

Given that AI systems learn from existing data, when such data contain gender or social-economic prejudice, the products generated by these systems cause discrimination, with a risk of reproducing and even enhancing inequalities.

Lastly, the use of AI technologies is revolutionizing the labor market and bears with it the risk of the disappearance of many professions and the evolution of others. Unless mitigating measures are taken, the risks for enhancing inequalities and increasing challenges for dignified work grow.

In this context, it is indispensable that countries that use and develop artificial intelligence technology take the necessary short-term, mid-term and long-term measures, to mitigate the effect of these technologies on fundamental human rights. Both systems and solutions should follow the approach that the protection of human rights is at their foundation.

Considering the power and effect of the use of these technologies on democracy and the rule of law, an approach based on fundamental rights and freedoms represents the first mitigating step.

³ Council of Europe. (2021). *Human Rights and Artificial Intelligence*

⁴ Paul, J. (2024, November). *Privacy and data security concerns in AI*.

⁵ Global Cyber Security Network. (2025, March 21). Why are cyberattacks on the rise? Causes, threats, and protection tips.

⁶ UNESCO and UNDP (2025). *Freedom of expression, artificial intelligence and elections*.

III. ARTIFICIAL INTELLIGENCE IN ALBANIA, CHALLENGES OF CONSOLIDATING LEGAL AND REGULATORY FRAMEWORK

2.1 Legal and regulatory framework on Artificial Intelligence in Albania

The regulation of the use and development of AI technologies in Albania is still at an embryonic phase. At present, the basis of such regulation are amendments to law no. 43/2023 “On Electronic Governance,” amended, the Methodology of Technical Standards for the Use of Artificial Intelligence, and law no. 16/2024 “On Public Procurement” and Law No. 124/2024 “On the Protection of Personal Data.”

Law no. 43/2023 “On Electronic Governance,”⁷ amended, defines that *artificial intelligence is the simulation of human intelligence processes through computer systems and algorithms*. Article 39 of the law “Use of artificial intelligence technology” establishes:

1. The technology of artificial intelligence is applied, where possible, to electronic systems of information and communication technology, for the purpose of the growth and innovation in digital economy.
2. The methodology and technical standards for the use of such technology are established by decision of the Council of Ministers.

Aside from the above, the law does not address regulation of artificial intelligence technologies.

In 2024, according to the above stipulations, the Council of Ministers approved the document of the Methodology and Technical Standards for the Use of Artificial Intelligence in the Republic of Albania.⁸ The decision tasks the National Agency for the Information Society, ministries, and other public institutions, for its implementation.

The subject of the methodology is to provide a systemic and structured approach to the development, implementation, and management of artificial intelligence technologies. It ensures golden and effective instructions for establishing the concrete actions and measures that will be taken in order to guarantee a successful and safe implementation of new artificial intelligence technologies.

The methodology establishes technical standards, the requirements for risk management, ensuring the life cycle of AI systems, data integrity, cyber security, and the control of the supply chain. It classifies AI systems into four categories, by the level of risk: (i) Unacceptable risk – AI systems that in essence violate the values and fundamental rights of the EU; (ii) high risk – include AI technologies to use critical infrastructure that may jeopardize the lives and health of citizens; educational or vocational training, which may determine the access to education and careers; product security components; worker employment and management; essential public and private services; law enforcement; management of migration, asylum, and border control;

⁷ <https://qbz.gov.al/preview/9fb689d7-75d3-4621-a5a4-dab6e3a52d93>

⁸ <https://qbz.gov.al/preview/9832489f-185c-43e6-a5a3-f905d53db219>

administration of justice and democratic processes; (iii) limited risk – AI systems pose minimal threats, but still require a certain level of user awareness. For instance, when using AI systems, such as *chatbots*, people should be aware that they are interacting with a machine; (iv) minimal or no risk – this category includes AI systems with practically no risk to security, privacy, or rights. The inclusion of AI in applications such as videogames, electronic mail filters, and similar systems.

Furthermore, the methodology establishes that the process of risk management and its results should be administered through transparent policies and procedures.

Ethical standards envisioned by the Methodology highlight protection of privacy, security, transparency, responsibility, and human oversight. The use of AI should be compatible with fundamental rights and human rights, avoiding any form of discrimination or misuse of data.

However, the macro-managerial and macro-oriented approach of this document to implementing new artificial intelligence solutions creates uncertainty regarding the risks associated with the use of AI. Furthermore, the language used in the Decision of the Council of Ministers (DCM) — particularly in the provisions affecting public institutions under the authority of the Council of Ministers — leaves room for misinterpretation, including the possibility of excluding AI-related solutions for non-public sectors.

Law No. 16/2024 “On several additions and amendments to Law No. 162/2020 ‘On Public Procurement’”⁹ stipulates that the contracting authority or entity, when drafting technical specifications, must verify through the Electronic Procurement System—via interoperability with other national systems—whether national or international standards are in force for the goods, works, and services in question. The system must be developed using advanced artificial intelligence technologies and robotic processes, in accordance with European standards. The amended law also requires that the dynamic purchasing system and the electronic auction be developed using advanced AI technologies and robotic processes. Furthermore, it provides for the establishment of the electronic complaints system, which must also be developed using advanced AI technologies and robotic processes to automatically suspend and lift suspensions of procurement procedures.

In the authors’ view, the public procurement law leaves room for ambiguity regarding final responsibility for outcomes generated through artificial intelligence processes in procurement, as it does not incorporate one of the ethical principles articulated in the methodology presented above, which requires that institutions ensure AI systems do not replace ultimate human responsibility and accountability. Moreover, the use of artificial intelligence in public procurement, in the absence of a comprehensive legal, ethical, and institutional framework that guarantees oversight, transparency, and human responsibility, creates risks of automating biases, enabling algorithmic manipulation, and weakening accountability. The integration of AI into the automatic suspension of procurement procedures may undermine the principle of legal

⁹ <https://qbz.gov.al/eli/ligj/2024/02/08/16>

certainty and the right to an effective remedy if automated decision-making is not accompanied by full transparency, public access to data, and human intervention in cases of errors.¹⁰

Law No. 124/2024 “On the Protection of Personal Data”¹¹, fully harmonised with the GDPR and Directive (EU) 2016/680, contains provisions regulating automated decision-making. Article 13 obliges data controllers to inform data subjects about the existence and logic of automated decision-making and profiling, as well as the significance and the envisaged consequences of such processing. Article 20 provides that data subjects have the right not to be subject to a decision based solely on automated data processing, including profiling, where such processing produces legal effects or similarly significant adverse effects on them.

Article 53 prohibits decisions based exclusively on automated processing, including profiling, where such decisions result in negative legal consequences for the data subject. Article 31 further stipulates that where a type of processing—particularly processing using new technologies—is likely, by virtue of its nature, scope, context, and purposes, to result in a high risk to the rights and fundamental freedoms of individuals, the controller must, prior to initiating the processing, carry out a data protection impact assessment of the envisaged processing operations. It should be noted that Article 31 will enter into force in December 2026.

The Draft National Strategy for Artificial Intelligence 2030,¹² consulted publicly,¹³ represents the first published document that displays the government’s vision for empowering the country in a digital manner, whereby AI will be the driving engine for economic growth, social advancement, and perfection of public services. It is expected to be approved in the first trimester of 2026.¹⁴

The Draft Strategy envisions that by 2030, Albania will have developed world-class capacities for AI, integrated it in all sectors, established sustainable infrastructure, ensured ethical and inclusive AI, encouraged a collaborative artificial intelligence economy. Ensuring ethical and inclusive AI incorporates guidance in creating a responsible AI ecosystem where ethics, transparency, and inclusivity are fundamental. The strategy establishes that AI governance in Albania will protect citizens’ rights, ensure that AI systems are fair and explainable, and promote artificial intelligence that brings about benefits for all communities.

The Draft Strategy identifies eight areas of high potential for the implementation of AI: 1. Health care, 2. Education, 3. Agriculture, 4. Transport, 5. Environmental monitoring and resilience to climate, 6. Cultural heritage and tourism, 7. Public services and citizen engagement, and 8. Energy.

The Draft Strategy establishes six basic pillars that will support the development, implementation, use, and monitoring of AI: 1. Infrastructure and Ecosystem; 2. Artificial

¹⁰ See also <https://ais.al/new/wp-content/uploads/POSITION-PAPER-AIS-PUBLIC-PROCUREMENT.pdf> and https://citizens.al/en/2024/01/23/ndryshim-i-parakohshem-ligji-i-ri-per-prokurimet-publike-pritet-me-kritika/?utm_source=chatgpt.com

¹¹ https://kpa.al/wp-content/uploads/2025/02/Ligj-nr.-124-2024-Per-mbrojtjen-e-te-dhenave-personale-1_.pdf

¹² <https://konsultimipublik.gov.al/Konsultime/Detaje/864>

¹³ Until the time of the publication of this paper and available information, the Draft Strategy has not been approved yet.

¹⁴ According to the comments submitted by NAIS to the research team following the consultation process on the draft document.

Intelligence in Industry; 3. Labor Force Education and Development; 4. Legal Framework; 5. Data as an enabling strategic factor; 6. International Cooperation.

Pillar four, the legal framework, further elaborates principles and measures envisioned to be undertaken for the protection of human rights, such as: - establishing a group of ethical principles that guide the development and implementation of AI technologies; - transparency: the principle of making artificial intelligence systems data, methods, and results accessible and understandable for relevant interested parties; such as developers, users, regulators, and the public; - governance and oversight: creation of regulatory frameworks that establish the roles, responsibilities, and obligations of the different stakeholders involved in the artificial intelligence lifecycle such as developers, providers, users, and regulators; data safety and privacy: establishing golden rules and standards for the protection of data; - equality, fairness, and non-discrimination: establishment of guidelines and standards for the collection and analysis of data, the projection and testing of algorithms, and the evaluation and auditing of AI systems.

The strategy also envisages the preparation of the legal framework for regulatory artificial intelligence sandboxes,¹⁵ which will be harmonized with the EU's Artificial Intelligence Act. This framework, according to the strategy action plan, envisages the preparation of AI sandbox regulations in 2025.

Harmonization of the legal framework with the EU Artificial Intelligence Act (AI Act)

In the framework of EU recommendations and pursuant to the priorities established in the Common Position¹⁶ for Cluster III "Competitiveness and inclusive growth,"¹⁷ Chapter 10 "Digital Transformation and Media," the Government has prepared an **initial working plan**, which envisages:

- Analysis of the EU AI Act contents;
- Identification of areas of implementation and responsible institutions;
- Assessment of impact on existing Albanian legislation;
- Proposal of measures to transpose and implement this act in the national legal framework;
- Consultation with interested parties.

An interagency working group¹⁸ is in the process and the draft decision for the establishment of this working group is in the final approval phase. The working group will be tasked with:

- Analyzing the EU AI Act contents;

¹⁵ Regulatory sandboxes for AI are controlled test environments where innovators may develop and test new AI solutions under the supervision of regulatory authorities, without risking the violation of existing laws. They aim to balance innovation with security, ethics and protection of fundamental rights, by allowing authorities to assess risks and improve regulations before broad implementation.

¹⁶ [https://www.consilium.europa.eu/en/meetings/mpo/2025/3/working-party-on-enlargement-and-countries-negotiating-accession-to-the-eu-\(352584\)/](https://www.consilium.europa.eu/en/meetings/mpo/2025/3/working-party-on-enlargement-and-countries-negotiating-accession-to-the-eu-(352584)/)

¹⁷ <https://www.kryeministria.al/newsroom/hapen-negociatat-per-kapitujt-e-grupimit-3-konkurrueshmeria-dhe-rritja-gjithperfshirese/>

¹⁸ Response from NAIS to the SCiDEV freedom of information request, on 08.09.2025

- Establishing priority areas of transposition;
- Coordinate responsible institutions;
- Proposing relevant by-laws.

The National Agency for the Information Society (NAIS) and the MIE, as for all acts and processes linked with Chapter 10 “Digital Transformation and Media,” have a leading and coordinating role, in their capacity as co-negotiators of the Chapter. NAIS, as the proposing institution, has the leading role pursuant to Law no. 43/2023 “On Electronic Governance,” and pursuant to Albania’s Digital Agenda 2022 – 2026.¹⁹

NAIS states that it is pursuing a structured process to align the Albanian legal framework with the European Union’s Artificial Intelligence Act, which includes the establishment of a dedicated working group, the translation and adaptation of the EU acquis through the PIEA platform (European Integration Platform for Legal Approximation), and the provision of technical support through the EU’s TAIEX instrument for institutional expertise and assistance. According to NAIS, the process is expected to take place throughout 2026 and to conclude with the adoption of the draft law by the Council of Ministers and the Parliament.²⁰ At this stage, the process remains predominantly normative and focused on formal harmonisation with the EU acquis, while concrete mechanisms for implementation, oversight, and the effective safeguarding of fundamental rights in the use of artificial intelligence in public governance have yet to be addressed.

2.2 Current practices for AI use in Albania

Although in the absence of a mandatory, complete, and clear legal framework, which is not yet aligned with EU legislation, the Government of Albania has undertaken a series of initiatives for the use and development of AI technologies in governance. The National Agency for the Information Society is the leading institution in the strategic and practical development of AI in the country. The NAIS has been authorized to sign the Strategic Partnership Agreement with the “Microsoft Corporation” company, on 27.0.2024, with the following areas for potential cooperation:²¹

- Strategy for IT enterprises and planning;
- Achieving the goals of the Council of Ministers, by maximizing value from technology investments to provide innovation for citizens, businesses, and civil servants;
- Microsoft Advisory Services;
- AI projects for digital initiatives.

¹⁹ <https://qbz.gov.al/eli/vendim/2022/06/01/370/8fd7b0cf-6848-431f-8bcb-5d08d16deaa7>

²⁰ According to the comments submitted by NAIS to the research team following the consultation process on the draft document.

²¹ Response from NAIS to requests for information by SCiDEV and AHC, on 16.10.2025

Table 1: AI Integrations in Albania, based on reflection on the Artificial Intelligence Strategy

AI Solution	Description
Integration of AI in the public administration through “Diella” – the e-services virtual assistant on e-Albania	“Diella,” the virtual assistant launched on e-Albania at the end of 2023, has audio and video integration and advises citizens to obtain electronic services. Diella will fill out online applications through simple voice conversations, transforming interaction with the state into a natural process – reducing human intervention and waiting times, while considerably increasing effectiveness and quality of services.
Integration of AI in the Public Administration through the AI Module for the Alignment of EU Legislation with Albanian Legislation	In order to accelerate and modernize the legislation alignment process, AI has been integrated into the European Integration and Accession Platform (EIAP), automating key functions. By means of AI, it is possible to conduct: <ul style="list-style-type: none"> i. Automatic translation of laws with an accuracy of over 97%; ii. Analysis and identification of discrepancies with Albanian legislation; iii. Automatic generation of the compatibility table; iv. Real-time monitoring of the process of translation and alignment; v. Allowing manual improvements by experts, combining technological power with human decision-making for the purpose of verifiability and maintaining responsibility on the use of AI models.
AI in legislation overlap	The development of the Legal Overlap System focuses on creating the analytical process for the automatic discovery of overlapping between laws and by-laws, which integrate advanced mechanisms for identifying normative conflicts. The solution has been built in a way as to enable the analysis of all laws and by-laws that are approved and published in the Official Publication Center (OPC). At present, the system has the full capacity for handling every available law on the OPC, ensuring gradual expansion of the analysis without limitations in the field of legislation.
AI in fiscal analysis, fight against fiscal evasion (tax office/ customs)	The system for the detection of anomalies in the fiscalization system focuses on the development of a smart model for fiscal analysis and identification of abnormal transactions in the electronic fiscalization system (eIAD). The development of this system represents an important step toward increasing the effectiveness of financial oversight, through the integration of advanced technologies of “Big Data” and

	Machine Learning. In the first phase, the model has been built for identifying suspicious transactions in real time, increasing transparency and operational effectiveness. In the second phase, the project has been expanded with a focus on analyzing the system of salaries and personal income taxes.
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For the above integrations, the NAIS states that they are in accordance with the provisions of the Methodology for Technical Standards in the Use of Artificial Intelligence in the Republic of Albania. In the context of obligations deriving also from the Methodology, for the integration of AI, measures have been undertaken that include:

- Preliminary assessment of ethical and legal impact (AI Impact Assessment) for every single solution, in accordance with the principles of transparency, fairness, and personal data protection;
- Classification of risks of AI systems, according to the risk methodology established in national standards, establishing relevant control and monitoring measures;
- Protection of the sovereignty of data, through the use of certified cloud infrastructures controlled by the state;
- Technical and operation documentation of every development phase in order to ensure full technical and operational auditability of every development phase and compatibility with the requirements of ethical governance of AI.

However, preliminary ethical and legal impact assessments for the above-mentioned solutions have not been made public. The authors were unable to identify any publicly available information regarding the risk classification of these solutions. With regard to the budget or costs of the implemented AI solutions, NAIS did not provide such information to the research team, arguing that it constitutes classified information and that it is difficult to isolate AI-related costs, as these components are embedded within large, multifunctional digital projects.²² NAIS further states that transparency will be ensured through the publication of periodic reports on costs, risk assessment procedures, and the results of AI project implementation.²³

Minister of State for Public Procurement - Diella

On September 11, 2025, the Prime Minister of Albania announced during a meeting of the Socialist Party National Assembly the creation of a new minister of state, empowered by AI, called “Diella”.²⁴

During the presentation, the Prime Minister emphasized: “*She [Diella] will not be physically present, but created virtually by artificial intelligence; will have the support of a special structure for the adoption of artificial intelligence in government processes, as well as a special mandate*”

²² According to the comments submitted by NAIS to the research team following the consultation process on the draft document.

²³ According to the comments submitted by NAIS to the research team following the consultation process on the draft document.

²⁴ <https://www.kryeministria.al/ministrat/diella/>

to break the barriers of prejudice, fear and, above all, the rigidity of the administration. And to have as great an impact on the pace of government processes as possible.”²⁵

On September 12, 2025, the President of the Republic of Albania announced the decree for the appointment of the Prime Minister. This decree had as its second article, the granting of competences to the Prime Minister to *also exercise the responsibilities for the establishment and functioning of the Virtual Minister of Artificial Intelligence “Diella.”*²⁶ To date, this is the only public document that attempts to regulate the virtual minister of AI.

Debates regarding the legality of this decision, the concept of an AI-generated minister, and the technical feasibility of such a solution have also been raised, although comprehensive and conclusive answers from the Government are still lacking. Beyond the publicly disseminated videos featuring the Diella avatar, there is no regulatory development defining the exercise of powers by a virtual minister or clarifying how such powers would be exercised within the boundaries established by Albanian law.

The use of AI technologies for monitoring the territory

In April 2025, a loan agreement was ratified between the Council of Ministers of the Republic of Albania and the Abu Dhabi Development Fund for funding the project “Camera System under the Administration of the State Police – SMART City.”²⁷ This project, worth USD 118,500,000 and an interest rate of 4% per year on the amount of the loan principal withdrawn and not paid back, seeks to strengthen technical infrastructure in the Republic of Albania, in order to guarantee a safe and smart environment, benefiting from the technologies of artificial intelligence.²⁸ The project includes securing and installing artificial intelligence platforms for city and traffic management, besides an advanced control center.

In response to a freedom of information request submitted by SCiDEV in March 2025 to the Ministry of Interior, the Ministry confirmed that 2,239 ANPR (automatic number plate recognition) cameras and 2,602 PTZ cameras would be installed for traffic monitoring and violation detection. Twelve monitoring centres will be established within regional police directorates. The response also states that 2,000 existing cameras located in places such as schools, shopping centres, and other public areas will be integrated and monitored for public safety purposes.

In February 2025, the Albanian Government, through the Ministry of Interior, signed a letter of engagement for the Albania Smart City Project with Presight AI Ltd, a United Arab Emirates-based company specialising in artificial intelligence, data analytics, and digital transformation services.

In the same response, the Ministry of Interior stated that data security would be ensured through robust protection measures aimed at preventing unauthorised access, misuse, or leakage of sensitive information. It further noted that the use of artificial intelligence in monitoring—specifically for analysing the behaviour of vehicles and individuals with the aim of preventing or reducing road accidents—would always be carried out in compliance with individuals’ rights. In

²⁵ <https://ata.gov.al/2025/09/11/diella-e-krijuar-nga-inteligenca-artificiale-ministre-shteti-e-prokurimeve-publike/>

²⁶ President of the Republic of Albania. (2025, September 12). *President Begaj decrees the appointment of the Prime Minister of the Republic of Albania* [Press Release].

²⁷ <https://www.kryeministria.al/newsroom/projektligje-te-miratuara-ne-mbledhjen-e-keshillit-te-ministrave-date-28-shkurt-2025/>

²⁸ Official Gazette (Year 2025 – Number 63), page 7492

reply to the FOI request submitted by SCiDEV and the Albanian Helsinki Committee regarding the stage of AI deployment for analysing camera-captured data under the “Smart City” project, the Ministry stated that it is currently in the process of preparing the project and reviewing the proposed draft contract.

From a legal and governance perspective, the project underscores the necessity of a careful and balanced approach between technological innovation and the protection of individuals’ fundamental rights. The integration of AI technologies into such systems requires clear standards for data processing, transparency regarding technical partnerships, and guarantees for independent oversight.²⁹ The absence of publicly available information on the contract, technical specifications, and data storage or usage practices highlights the need for an open public debate and for strengthening legal mechanisms that ensure proportionality, accountability, and full compliance with personal data protection principles, in line with European best practices.

The use of AI to process high-resolution camera footage significantly increases surveillance risks for Albanian citizens. Institutions have not provided an assessment of the risk level associated with the use of these systems, despite the requirements set out in the AI Methodology. This very low—if not entirely absent—transparency, combined with the surveillance potential of AI-enabled camera systems, raises serious concerns regarding the protection of citizens’ fundamental rights, as well as broader implications for democracy and the rule of law.

²⁹ <https://balkaninsight.com/2025/02/03/albanian-smart-city-deal-with-uae-firm-flagged-as-serious-surveillance-risk/>

IV. REGULATION OF ARTIFICIAL INTELLIGENCE SYSTEMS IN THE EUROPEAN UNION

4.1 Starting point for regulating AI in the EU

The regulation of the use of artificial intelligence systems began in 2018 with the creation of the High Level Experts Group (HLEG), whose purpose was to approve a legal instrument for IA as a primary priority in the EU policy agenda.³⁰ In 2020, this Group published the White Paper on AI, which presented for consultation with groups of interest as to what the best policy would be for regulating AI; it resulted in the presentation of the first draft that establishes the main rules for the use of AI systems,³¹ and that currently represents the EU Act on Artificial Intelligence.

The Artificial Intelligence Act (AIA) enables not only the regulation of the broad use of AI systems, but it also ensures the increased trust in these systems and emphasizes the essential need that these systems are based on fundamental values and rights such as human dignity, protection of privacy, non-discrimination, freedom of expression, and focusing on the mitigation of risks that their use might bring about. The Commission aims at the regulation of trusted and safe AI being an important indicator for achieving the Sustainable Development Goals and moving forward the 2030 Agenda presented by the Commission President.³²

By means of the analysis by the High-Level Experts Group (HLEG), special attention was devoted to the damage that the use of AI might bring about, both material and non-material damages. The main material damages that states and AI providers should keep in mind have to do with the safety and protection of the health of individuals, which includes the loss of life and potential harm to wealth; meanwhile, non-material damages envisage the loss of privacy, restrictions to the freedom of expression, human dignity, discrimination, especially in the circumstances of access to employment, which may be linked with a broad range of risks that may come from the use of unregulated AI.³³ Meanwhile, such an analysis was not published with the methodology and technical standards for the use of AI systems.³⁴

It is important to emphasize that the main risk envisaged by the AI Act has to do with the violation of human rights and issues linked with cybersecurity in the application of AI in delicate infrastructures, such as defense, health care, etc., as well as the use of such systems with malign ends.

³⁰ AI for Europe, COM/2018/237 final

³¹ COM(2020) 65 final. European Commission. (2020). WHITE PAPER On Artificial Intelligence - A European approach to excellence and trust

³² President Ursula Von der Leyen, A Union that strives for more – My agenda for Europe, page 17.

³³ Ibid, page 10.

³⁴ Council of Ministers of the Republic of Albania. (2024, 24 July). *Decision no. 479, date 24.7.2024, on the approval of the methodology document and the technical standards for the use of artificial intelligence in the Republic of Albania.*

4.2 On the European Union Act on Artificial Intelligence

The AI Act, approved in December 2023, has entered into effect partially on August 1, 2024, and will enter into effect fully on August 2026; in 2027, this regulation will be fully implementable. The AI Act establishes four main objectives, making it possible that the use of systems in the EU market is safe and respects fundamental rights, as well as guarantee the preservation of juridical certainty and the effective enforcement of legislation in force. This regulation aims at developing a market where trustworthy and human-centric AI systems (“*man above everything*”).³⁵

Based on these objectives and also having as a goal regulation of AI systems at the Union level, avoiding fragmentation and divergences, this regulation clearly establishes and classifies AI systems approving an approach based on the evaluation of risk that this system presents and going as far as the ban on certain practice of artificial intelligence.³⁶ This regulation is also found in the methodology and technical standards for the use of AI systems in Albania.³⁷ The AI Act also envisages that AI systems that pose unacceptable risks should be banned while those of higher risks should be monitored and operators should establish criteria in as transparent a manner as possible.³⁸ This classification is also found in the Albanian methodology, but without envisaging what happens or how the evaluation of the risk of these systems will be done, as in the case of the EU regulation.

The lack of these definitions in a reality where the development and use of AI is developing intensively brings about the indispensability of temporarily addressing mitigating measures.

The EU Regulation on AI, based on risk assessment, focuses on the negative impact on fundamental rights. Its goal is to place the regulatory focus on AI systems with a high risk, distinguishing them from those for which voluntary measures will suffice instead of mandatory ones. This framework emphasizes the importance of protecting fundamental rights in order to encourage trust in AI systems.³⁹ This regulation envisages that high-risk systems should fulfill a certain number of requirements: monitor the entire cycle, be trained and tested with data sets appropriate for this purpose, be accompanied by technical documentation and information for implementers about potential risks, allow automatic preservation of system event data, be subjected to human oversight when in use and be subjected to a conformity assessment procedure before being put in the market or in service.⁴⁰

Meanwhile, the Albanian methodology envisages that in order to determine the types of systems, the actions recommended have to do with the drafting and regular review of documentation policies, which, among others, address: information on AI interest parties, the implementation and use of AI, potential risks and likely impact, preliminary conditions and limitations, algorithmic methodology, as well as monitoring and change management plans. All these criteria

³⁵ See article 1 of the Regulation no. 2024/1689 of the EU “AI Act” and principle 1.1 & 1.2 and Chapter IV/1 of *Decision no. 479, dated 24.7.2024, on the approval of the methodology document and technical standards for the use of artificial intelligence in the Republic of Albania*.

³⁶ Kusche, I. (2024). Possible harms of artificial intelligence and the EU AI act: fundamental rights and risk. *Journal of Risk Research*, 1-14.

³⁷ See Standard 1.1/ Ç of *Decision no. 479, dated 24.7.2024, on the approval of the methodology document and technical standards for the use of artificial intelligence in the Republic of Albania*.

³⁸ See Recital 31 & 179 of Regulation no. 2024/1689 of the EU “AI Act”

³⁹ Yordanova, K. (2022). The EU AI Act-Balancing human rights and innovation through regulatory sandboxes and standardization.

⁴⁰ Article 9-16 of regulation no. 2024/1689 of the EU “AI Act”

are at the recommendation level and do not envisage clear and mandatory regulation of the monitoring of the types of AI systems.⁴¹

4.3 Fundamental rights and the risk of using AI systems

The European Union has been proactive in meeting objectives that aim to regulate the regulation of AI systems on ethical bases. At the center of this undertaking is the AI Act, although there is a broad legal framework and regulatory tools that contribute to overseeing AI, such as the Digital Service Act (DSA), General Data Protection Regulation (GDPR). While the implementation of the AI Act is now a reality in the EU, there is growing concern regarding the foreseeing ability of AI to help decision-making and move it away from depending solely on automated calculations. Relying on data and training algorithms, which are selected through unknown processes leads to biased results and the potential continuity of historic injustices in the future that may result in discriminating conclusions.⁴²

The White Paper of the European Union (2020) ranks “*the loss of privacy, restrictions to freedom of expression, human dignity, discrimination, for instance in access to employment*” as potential damages of AI, separating them as non-material risks to fundamental rights from material risks to health and safety. This reflection has been done in *Recital 1* of the AI Act that envisages that democracy, the rule of law, and the environment be included in the list of subjects potentially at risk from AI.⁴³ The AI Act establishes all potential damages of AI systems as damages to a fundamental right and confirms a risk-based approach to regulation.⁴⁴

As a result, fundamental rights become a central reference for legal, political, and daily decisions made by individuals affected by AI systems. The first reference is mentioned as an integral part of the regulatory framework of the AI Act, where they are documented not as mandatory regulations, but as guiding principles that should be taken into consideration. Nevertheless, in order to assess the infringement of fundamental rights from the implementation of AI systems, the regulation does not envisage any special provision, thus leaving such competence to judicial institutions.

Another important element that this regulation places an emphasis on is the respect for fundamental rights during the creation of AI systems. In the regulation, human values are protected and are also reference points that justify in an explicit or implicit manner the decisions to involve AI system types in the high-risk category. The third reference to fundamental rights in this regulation has to do with the compatibility that the regulation presents as an indicator of trustworthiness. This indicator is tautological because although there are AI systems that potentially could infringe upon fundamental rights (*high-risk systems*), the regulation allows them to carry out their activity under monitoring. Nevertheless, the risk for users who continue to use such an AI system remains present, independently from whether such a system is in

⁴¹ See standard 1/B of *Decision no. 479, dated 24.7.2024, on the approval of the methodology document and technical standards for the use of artificial intelligence in the Republic of Albania*.

⁴² Zajko, Mike. 2022. “Artificial Intelligence, Algorithms, and Social Inequality: Sociological Contributions to Contemporary Debates.” *Sociology Compass* 16 (3): E12962. <https://doi.org/10.1111/soc4.12962>.

⁴³ Recital 1 of Regulation no. 2024/1689 of the EU “AI Act”

⁴⁴ Recital 14 of Regulation no. 2024/1689 of the EU “AI Act”

accordance with the regulation or not and the preservation of the standards of fundamental rights. As a result, trustworthiness may be considered a continuous risk, which is unacceptable for the existence of the system.

The new regulation presents AI systems that pose ‘unacceptable’ and ‘high-risk’ threats that could have a harmful impact on the health, safety, or fundamental rights but are still authorized while being subjected to a series of requirements and obligations for carrying out their activity in the EU market. The AI systems that pose limited risks due to the lack of their transparency, according to the regulation, are to be subjected to the information and transparency requirements, while AI systems that only pose minimal risk for people will not be subjected to further obligations. Furthermore, the AI Act establishes specific rules for AI models for general purposes (GPAI) and establishes stricter requirements for GPAI models with ‘*high-impact capabilities*’ that might pose a systemic threat and have significant impact on the internal market.⁴⁵

Article 27 of the regulation envisages that: “*Prior to deploying a high-risk artificial intelligence system, referred to in article 6(2), with the exception of high-risk AI systems intended to be used in the area listed in point 2 of Annex III, deployers that are bodies governed by public law, or are private providing public services, and deployers of high-risk AI systems referred to in points 5 (b) and (c) of Annex III, shall perform an assessment of the impact on fundamental rights that the use of such system may produce.*”⁴⁶ The assessment of the impact on fundamental rights is one of the main pillars for the implementation of AI systems and is envisaged also in article 35 of the GDPR, which requires an assessment of the impact on personal data protection in critical scenarios. Nevertheless, what remains unclear is the manner in which the providers of AI systems may infringe upon fundamental rights, whether directly, or indirectly through the generation of information. Moreover, article 9 of the regulation envisages a general assessment of the risk, which includes the dimensions of fundamental rights, imposing on the providers of AI systems the obligation to carry out such a comprehensive analysis of the risk.⁴⁷

4.4 CoE Framework Convention on Artificial Intelligence

In parallel with EU efforts to regulate in a harmonized manner the use of artificial intelligence, the Council of Europe also approved the Framework Convention on Artificial Intelligence, Human Rights, Democracy, and the Rule of Law,⁴⁸ thus underscoring Europe’s engagement to regulate AI in a manner that protects fundamental values and also ensures the responsible use of new technologies. At present, this Convention has been ratified by the European Union as well as other countries,⁴⁹ thus making it the first international instrument in this area. It aims at ensuring that activities included in one of the cycles of AI systems are in accordance with the rule of law, democratic systems, and human rights. The main purpose of the convention is the fulfillment of

⁴⁵ Madiega, T. (2024, September). *Artificial intelligence act*.

⁴⁶ See article 27 of the Regulation no. 2024/1689 the EU “AI Act”

⁴⁷ Hacker, P. (2024). AI regulation in Europe: from the AI act to future regulatory challenges. *Ifeoma Ajunwa & Jeremias Adams-Prassl (eds), Oxford Handbook of Algorithmic Governance and the Law*, Oxford University Press.

⁴⁸ Council of Europe, Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law (Sept. 5, 2024), <https://rm.coe.int/1680afae3c7>

⁴⁹ <https://www.coe.int/en/web/artificial-intelligence/the-framework-convention-on-artificial-intelligence>

existing standards established by states and international institutions, as well as addressing every legal vacuum in the face of technological developments.

The framework convention envisages in an inclusive manner a legal framework that guides the life cycle of AI systems by concentrating on potential risks during the different phases of projection, deployment, and dismantling. It applies to all subjects involved with AI systems or those subjects that operate on behalf of AI systems, providing a control mechanism and promoting international cooperation to ensure compliance. Based on this convention, states have two opportunities: implement directly the provisions of the Convention or draft alternative standards harmonized with their international obligations for human rights, democracy, and the rule of law.

The Convention envisages that AI systems should be transparent and have specific oversight, such as marking AI-generated content. This convention places an emphasis on users being responsible in such a way as to preserve privacy and are not discriminating. Likewise, just like the EU AI regulation, the Convention stresses the need for assessments regarding the impact on human rights, democracy, and the rule of law, identifying some AI applications as having red flags due to threats to national security. The Convention puts on parties that have ratified it the positive obligation to ensure that the state has adequate legal tools to reinstate or compensate for damages caused by the use of AI systems in cases when human rights have been infringed upon and that these states should guarantee procedural protection including the notification of individuals when they use or are in an interaction with an AI system. At present, Albania has not signed the convention, being one of the few countries in Europe, together with Kosovo, North Macedonia, Serbia, and Bosnia-Herzegovina.⁵⁰ Furthermore, the draft strategy that has been launched for public consultation *National AI Strategy 2030: "Jump to Wellbeing"* or the *Decision of the Council of Ministers that regulates the use of AI does not envisage any measure or priority for the signing of this convention*.

It should be emphasized that CoE efforts to provide an instrument that establishes the standards for the use of AI and human rights have not been addressed by international institutions such as the ECtHR or the European Committee for Social Rights. The AI Convention and the ECHR principles provide strong guidelines for addressing cases linked with AI. In particular, the ECtHR has previously addressed new cases of human rights linked with technology, such as facial recognition systems. These CoE bodies seek to support human rights by holding national authorities accountable and by ensuring that the holders of rights have adequate protection through legislation, resources, independent mechanisms such as national human rights institutions, and effective coordination with other national human rights bodies.⁵¹

In the comments submitted by NAIS following the consultation process on this policy document, it is stated that the Convention is currently before the Parliament for approval. However, the authors were unable to identify any official document or public notice on the Parliament's website confirming the existence or progress of this legislative process. Furthermore, the signing and ratification of the Convention are not reflected in the draft Artificial Intelligence Strategy, which has already undergone public consultation. This discrepancy between institutional

⁵⁰ The Center for AI and Digital Policy. Jun 9, 2025. [A Call to Albania to Sign and Ratify the International Treaty on AI, Human Rights, Democracy, and the Rule of Law](#)

⁵¹ Steering Committee for Human Rights (CDDH), Drafting Group on Human Rights and Artificial Intelligence (CDDH-IA). (2025, March 12). *[Draft] Handbook on human rights and artificial intelligence: Chapters I, II and III* (CDDH-IA(2025)1REV). Council of Europe.



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statements and the strategic documents currently in circulation suggests a lack of coherence in policy planning and institutional coordination. NAIS has confirmed that this element will be included and reflected in the final version of the strategy.

V. RECOMMENDATIONS

Considering the current stated development of AI solutions in governance in Albania and the work that has just begun to align national legislation with the EU Act on Artificial Intelligence, the need arises to take transitory, short-term measures until the entry into force of the legal solution for the regulation of AI. In this framework, the following recommendations have been structured to address this transitory phase and the farthest future.

5.1 Transitory measures for the regulation of AI in Albania

Given that AI systems are already being procured and implemented in Albania without a dedicated legal framework, the Government should adopt an urgent package of temporary measures to prevent legal, ethical, and human rights risks until the full alignment of national legislation with the EU AI Act is achieved. The Government's proactiveness in adopting transitional measures to protect fundamental human rights pending the adoption of the EU Artificial Intelligence Act is a key test for building trust and ensuring transparency and accountability.

- Make public the working group on the alignment of national legislation with the EU AI Act, and expand its composition to include representatives of independent human rights institutions (the Ombudsperson, the Commissioner for Protection from Discrimination, the Commissioner for the Right to Information and Data Protection), academia, and civil society organisations, as a prerequisite for ensuring an inclusive, transparent process with a strong focus on the protection of human rights.
- Conduct an audit of existing contracts, including those with Microsoft and Presight AI, by the State Supreme Audit Institution.
- Approve an interim methodology for carrying out Fundamental Rights Impact Assessments for AI systems and introduce mandatory clauses on transparency and auditability in all existing contracts, in line with the requirements of the EU AI Act.
- Since NAIS is the institution mandated to develop and integrate AI in governance, it is essential to establish an inter-institutional working group—including independent human rights institutions and civil society organisations—to contribute to the preparation of Fundamental Rights Impact Assessments for AI systems.
- Signing and Ratifying the Council of Europe Framework Convention on Artificial Intelligence: The Government of Albania should sign and ratify the Council of Europe Framework Convention on Artificial Intelligence, Human Rights, Democracy and the Rule of Law, which would strengthen the national AI governance framework by establishing a foundation for the protection of human rights and the rule of law, while ensuring that future national regulation reflects democratic values and European international standards.
- Implement coordination mechanisms between AI service providers, institutions deploying AI technologies, AKSK, and NAIS to ensure that all solutions comply with national cybersecurity standards, with the aim of minimising the risk of cyberattacks that could compromise citizens' privacy.

- Ensure full transparency and systematic risk assessment for all contracts involving the use of AI in governance, including the “Smart City” project and other existing agreements with domestic or foreign companies. Public institutions should publish clear and accessible information regarding the scope, costs, implementing partners, timelines, and data protection mechanisms, ensuring an open and supervised process. A comprehensive assessment of legal, technical, ethical, and institutional risks should accompany every contract involving the use of AI, in order to strengthen public accountability, prevent abuse, and safeguard citizens’ rights throughout digitalisation processes.

5.2 Long-term measures for AI governance

Adoption of a comprehensive legal framework and alignment with the EU AI Act through broad consultation, inclusiveness, and transparency

A complete, clear, and inclusive legal framework for artificial intelligence should be drafted and adopted in Albania to ensure accountability, enforceability, and legal certainty. Harmonisation with the EU AI Act will provide coherence with the European regulatory framework, strengthen institutional trust and the protection of human rights, and support Albania in building a sustainable and responsible system of AI governance. The legal framework should provide for the establishment of a national competent authority for artificial intelligence, with clearly defined supervisory and regulatory powers. It should ensure the creation of a national database of algorithms and AI systems, in line with the transparency and oversight requirements set out in the AI Act. In addition, a structured mechanism for inter-institutional coordination should be established, including an advisory board with broad participation, to ensure coherent implementation, accountability, and the effective protection of fundamental rights.

Ensuring Coordination Between AI Governance, Cybersecurity, and Digital Legislation

Albania should establish interinstitutional Memoranda of Understanding (MoUs) and Standard Operating Procedures (SOPs) to guarantee full coordination between the new AI governance framework and existing legislation in the fields of cybersecurity and electronic governance. This includes alignment with Law No. 25/2024 on Cybersecurity, Law No. 43/2023 on Electronic Governance, and Decision of the Council of Ministers No. 479/2024. Key areas of integration should involve joint audit and inspection protocols, a unified incident response mechanism linking the AI Authority with the national CSIRT, and a shared system for information classification. Such coordination will prevent regulatory overlap, enhance institutional resilience, and ensure that AI-related security risks are addressed within the broader national digital security architecture, in line with the EU AI Act and the NIS2 Directive.

Developing a National Strategy for the Future of Work and Skills in the Age of AI

Albania should develop a comprehensive national strategy to address the impact of AI on employment and skills development. The strategy should include:

- A national mapping of professions and sectors most likely to be transformed by AI;



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- Curriculum reforms that integrate digital and AI-related skills from primary education through vocational and university levels; and
- Large-scale upskilling and reskilling programmes for the existing workforce, supported by incentive mechanisms such as “AI skills vouchers.”