



Albania
Investment
Council

Improving Transparency and Investment Climate

PROPERTY RIGHTS SECURITY

Progress and challenges

Tirana, April 2026



ABBREVIATIONS

This working document was prepared in the frame of the Meeting XXXVII of the Investment Council (20 April 2026) by the experts of the Secretariat of the Investment Council, Mr Elvis Zerva, Legal and Regulatory Expert, Ms Elida Fara, Economic Expert, Ms Xaira Shurdha, Monitoring and Liaison Expert, as well as with the contribution of external expert, Ms Arjola Tola, under the direction of the Head of the Secretariat, Dr Diana Leka (Angoni). Supported in the language editing of the material, Ms Elisa Lula, Administrative and Communication Officer at the Secretariat.

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AAB	Albanian Association of Banks
ALL	Albanian Lek
AmCham	American Chamber of Commerce and Industry
AMVV	Agency for the Support of Local Self-Government
EU	European Union
FIAA	Foreign Investors Association of Albania
GDTC	General Directorate of Tax Cadastre
MSME	Micro, Small and Medium-sized Enterprises
NAREA	National Albanian Real Estate Association
NRA	National Reform Agenda
SCA	State Cadastre Agency

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INTRODUCTION

Secure and clearly enforceable property rights are a vital prerequisite for economic growth, investment, access to credit, and social stability, positioning land registration reform as a critical pillar of Albania's development and European Union (EU) Reform Agenda. The current property rights landscape is historically complex, rooted in the transition from a centrally planned system, which resulted in legacy issues such as rapid privatisation, restitution claims, and informal development, creating overlapping ownership rights and legal uncertainty.

The Government of Albania has undertaken comprehensive land registration and property rights reforms to consolidate institutions, digitise records, complete first registration, and strengthen legal certainty. The progress is driven by a strategic commitment to institutional consolidation and accelerated digitalisation. To date some of the key operational achievements¹ include:

» **Digital Transformation:** Since 2020, all cadastral services have been available online via the e-Albania platform, modernising the

property management system and enhancing accessibility. This is further supported by strengthened data integration with Civil Status and notary systems.

» **Data Quality and Access:** The Digital Cadastre Centre, established in 2022, is focused on digitizing and enhancing data quality. The integration of cadastral information into the National Geoportal (ASIG) in 2025 is expected to improve, reliable online data for institutions and users' stakeholders.

» **Service Modernization:** Administrative efficiency is enhanced through process optimizations, including the implementation of the Fast Track service and the recent utilization of Blockchain technology for ten cadastral services with online payment capabilities options. Also, recently the State Cadastre Agency (SCA) developed a Communication Strategy² aiming to rebuild public trust and further align Albania's property registration system with EU standards.

But despite notable advancements in digitalization and administrative efficiency, the pri-

¹ <https://reform-monitor.org/wp-content/uploads/2025/05/Reform-agenda-Albania.pdf>

² www.ashk.gov.al

mary challenge persists in the absence of a comprehensive, unique, and consolidated land registry. Finalizing this process offers a key opportunity to clear up remaining legal uncertainties and move towards a predictable and attractive environment for all investors. The strategic benefits of completing the registry are crucial and substantial in two key areas for economic development: a) unlocking agricultural potential and b) enhancing proactive investment readiness. Achieving these outcomes is closely linked to the need to finalise the formal registration and inventory of state-owned properties at all levels of government, which is a prerequisite for transforming investment promotion.

Building on the progress outlined above, and taking into account the concerns raised by Investment Council (IC) business members for 2026, as well as the IC's previous work in 2019,³ including the updated progress of previous IC's recommendation,⁴ this Technical Note intends to bring some updated evidence from the private sector perspective—drawing on a survey of 146 companies and a focus group

discussion—to support greater economic certainty and contribute to the country's EU Reform Agenda efforts.

It focuses on challenges related to four pillars and provide recommendations on: a) *Operational Excellence and Standardisation*, to eliminate inconsistencies in service delivery, ensuring equitable access and reducing procedural uncertainty for all users; b) *Transparency and User Empowerment*: through the expedited registration of state property and the establishment of a regularly published, publicly accessible inventory, which will serve to strengthen investor confidence c) *Institutional Accountability*; and d) *Coordination, Data Integrity and Legal Certainty*.

Also, following the debates and discussions during the focus group meeting on the expected level of access to the land property data and expected cadastral fees, an explanatory note is provided in Annex 1, highlighting some current European and regional practices (Croatia & Serbia) for further consideration in regard by interested business partners.

METHODOLOGY

The Secretariat of Investment Council (IC) has undertaken the following steps to identify the challenges faced by businesses in relation to legal security of property and its registration:

1. *Desk review* of national strategies, international assessments, and stakeholder reports related to property registration reform in Albania. It synthesizes key sources to identify common challenges and gaps, focusing on legal, institutional, and operational aspects of the cadastral system, and highlights priority areas for reform based on a comparative analysis of policy commitments and implementation progress.
2. *Analysis of issues raised* by individual businesses and business associations submitted to the Secretariat between 2015 and 2025.
3. *Status of recommendations* approved with regard to the “Legal Security on Property” during IC Meeting XVI held on 30 May 2019, as well as other IC recommendations related to property rights.
4. *Secretariat Survey (March 2026)* – A structured online questionnaire was distributed
5. *Direct consultations* with representatives from the SCA, Agency for the Support of Local Self-Government (AMVV), American Chamber of Commerce (AMCHAM), NAREA, EU Delegation, UNOPS, and other stakeholders.
6. *A focus group meeting with experts and business associations was held on April 7, 2026*, in Tirana, with 21 participants representing the SCA, Albanian Investment Development Agency (AIDA), the National Chamber of Notaries, the Tirana Chamber of Commerce and Industry, the Builders Association, NAREA, WECA, Foreign Investors Association of Albania (FIAA), AMCHAM, Agritourism Association in Albania, advisor to the Minister of State and Chief Negotiator of Albania, and other relevant associations and stakeholders.

³ <https://www.investment.com.al/calendar-of-meetings/> - Meeting 16

⁴ <https://www.investment.com.al/monitoring-reports/>

CONTEXT

1. INTERNATIONAL REPORTS

The policy and institutional context for property registration reform in Albania is shaped by a series of national strategies, international assessments, and stakeholder reports, all of which underscore the **central role of secure and transparent property rights in economic development and European integration**. Key frameworks—including the National Strategy for Development and European Integration 2022–2030 and the Economic Reforms Program 2025–2027—**emphasize the need to complete initial property registration, advance full digitalisation of cadastral systems, and improve data accuracy to strengthen legal certainty, reduce transaction costs, and support investment**.

At the same time, recent assessments such as the EU Progress Report 2025 and the US Department of State Investment Climate Statement 2025 **highlight persistent challenges, including corruption risks, incomplete and inconsistent registration, outdated documentation, and weak enforcement of property rights**.

NATIONAL STRATEGY FOR DEVELOPMENT AND EUROPEAN INTEGRATION 2022–2030⁵

The Strategy identifies comprehensive and accurate property registration as essential for legal certainty, economic growth, and European integration. It prioritizes completing the initial registration of immovable proper-

ties, digitizing the cadastral system, and improving data quality to enhance transparency, reduce disputes, and streamline services for citizens and businesses. It also focuses on strengthening property rights, addressing longstanding ownership issues in line with EU standards, and promoting land consolidation to reduce agricultural fragmentation, boost productivity, and support sustainable rural development.

⁵ <http://qbz.gov.al/eli/vendim/2023/02/22/88>

European Reform Program 2025-2027⁶

Cadastral reforms aimed at increasing transparency and efficiency are essential for improving the business environment, as they ensure clear and secure property rights. These reforms go beyond technical modernization to strengthen how property rights are documented, protected, and transferred. Clear property rights and efficient registration systems reduce transaction costs, improve land and real estate allocation, facilitate access to finance through the use of property as collateral—especially for Micro, Small and Medium-sized Enterprises (MSMEs)—and provide the legal security needed for long-term domestic and foreign investment decisions.

EU Progress Report 2025⁷

The main findings highlight corruption in service delivery, unclear ownership, overlapping boundaries, and reliance on paper-based or outdated documentation, all of which undermine legal certainty and economic development. In response, the SCA adopted a 2025 roadmap to complete digitisation by 2026 and first-time property registrations by 2028, while the legalisation process for informal constructions has progressed, with 64% of applications approved. Despite reform efforts, property title registration remains incomplete and inconsistent, and although digitalisation has begun, progress has been slow and uneven, continuing to deter investment.

The recommendations call for stronger implementation of integrity measures in corruption-prone institutions, particularly the SCA, and for fuller implementation of the European

⁶ <http://qbz.gov.al/eli/vendim/2025/01/22/46>
⁷ [Albania 2025 Report](#)

Commission's outstanding recommendations. Priority actions include accelerating first-time property registrations, completing the digitisation of titles, documents, and maps, improving the accuracy and quality of cadastral data, and enhancing transparency and service delivery. Further efforts are also needed to advance property compensation processes and safeguard fair trial rights in expropriation cases. Although the legal framework is largely in place, the effective enjoyment of property rights remains limited due to incomplete registration, partial digitisation, and significant gaps in data verification.

US Department of State Investment Climate Statement 2025⁸

According to the report, individuals and investors face significant challenges with protection and enforcement of property rights in Albania. *"...Despite improvements with the recording system, the inadequate state of the data remains a risk for title security and a constraint to investment"*. The property sector is perceived by the public as one of the most exposed to corruption. Property registration procedures and obtaining property titles are still cumbersome and prone to widespread corruption.

2. CHAMBERS OF COMMERCE REPORTS

Complementary perspectives from the FIAA White Book 2025–2029, AmCham and NAREA further point to operational inefficiencies, legal gaps, data quality issues, and limited transparency in service delivery. Together, these sources present a consistent picture: while the legal and strategic framework is largely in place, significant implementation gaps remain, particu-

⁸ <https://www.state.gov/reports/2025-investment-climate-statements/albania/>

larly in completing registration, ensuring data reliability, improving institutional integrity, and delivering efficient, citizen-oriented cadastral services.

FIAA WHITE BOOK 2025-2029⁹

It highlights the ongoing challenges and necessary reforms in Albania's business environment, including issues related to property rights as part of the overall investment climate assessment. The White Book is presented as a structured, evidence-based policy document representing the collective voice of foreign investors. With focus to property, White Book identifies specific issues in the legislation concerning registration of property concerning: (a) compensation for damages from cadastral activities; (b) timely delivery of the cadastral services; (c) mortgage registration and property transfer.

Following that a set of recommendations are provided: (a) Introduce detailed provisions in Law No. 111/2018 defining damages from cadastral activities and the procedures for compensation; (b) Establish a Monitoring Committee and an interactive platform within the SCA to ensure timely service delivery and manage applicant complaints. (c) Remove paragraph 4 of Article 56 of the law no. 111/2018 to align mortgage registration with the Civil Code, allowing property transfers despite existing mortgages.

9 <https://fiaalbania.al/wp-content/uploads/2026/01/FIAA-White-Book-2025-2029-2.pdf>

AMCHAM IN ALBANIA¹⁰

The identified issues concern to the following pillars: (a) *Progress of initial registration*; (b) *Digitalization – quality of digital services versus cost*; (c) *The process of registering state-owned properties – issues at the local level, taxation, and use by investors*; (d) *The “Mountains Package,”* (e) *Integrity, quality of service, prevention of corrupt practices, and interaction with SCA.*

Some of the proposed recommendations are: (i) The public cadastral registry should be fully digital and accessible to the public, (ii) the professional accountability of notaries should be reviewed and strengthened to prevent double registration and ensure legal certainty, (iii) cadastral registration and legal security of land for the “Mountain Package” should be strengthened, particularly through improved inter-institutional coordination among municipalities, SCA, and central authorities, (iv) corruption prevention and professional ethics within the SCA should be reinforced through the establishment of internal control mechanisms, periodic review of procedures, and the standardization of SCA responses based on legal grounds.

10 AmCham Albania submitted a structured letter to the IC Secretariat during the consultation phase, outlining its members' findings and recommendations regarding property legal security in Albania. Detailed information is provided in Annex C.

3. ISSUES REFERRED TO THE SECRETARIAT BY BUSINESS COMMUNITY DURING 2015-2025

Businesses have continuously highlighted during the years (specifically during 2019) issues concerning property security and related registration procedure. Key problems include obstacles to registering contracts (such as 1-Euro contracts, AMTP, concession agreements), lack of coordination between municipalities and SCA, inaccurate or scattered property maps and data, and overlapping properties with legal uncertainties. Processes were slow and inefficient, including the *Fast Track* service for banks and file processing for developers, leading to delays and errors. Overall, the system was perceived as fragmented, non-uniform, and slow, creating uncertainty and difficulties for both investors and citizens.

4. PROPERTY REGISTRATION PROCESS IN FIGURES¹¹

INITIAL REGISTRATION

Out of **3,058** cadastral zones across the territory of the Republic of Albania, the initial registration process has been completed for **2,799 zones (91.5%)**. From this total, 259 cadastral zones (**8.5%**) remain to be registered. Currently, 123 cadastral zones are nearing completion of the registration process, which is expected to be finalized by the end of June 2026, bringing national coverage to approximately **95.5% within 2026.**

11 Only according to the official data as provided by the State Cadastre Agency on April 6th, 2026.

DIGITIZATION OF MANUAL PROPERTY CARDS

Out of a total of **4,076,000** manual records, **3,620,898** had been digitized by March 2026, representing approximately **90%** of the total. The number of records remaining to be digitized is 455,102 (11.2%). The digitization process is expected to be fully completed by the end of June 2026, marking the completion of the nationwide transition to a fully digital property registry system.

REGISTRATION OF AMTPS

According to data administered by the local directorates of the SCA, the total number of certificates for agricultural land, as of February 2026, is 117,799.

LEGALIZATION PROCEDURES DATA

LEGALIZATION PERMITS

2006 - 2025

293,013

EXCLUSIONS/ DECISIONS FOR NON-LEGALIZATION 2006- 2025

6,082

LEGALIZATIONS + NON-LEGALIZATION 2006-2025

297,196

IC Secretariat Note: *According to the SCA during the Focus Group Meeting, there is still a sample of 130,000–150,000 applications for legalization permits (with an undetermined number of properties) that are currently under ongoing evaluation procedures.*

Source: State Cadastre Agency

The Secretariat was unable to find any published aggregated data on the number and percentage of state properties owned by institutions and municipalities that are registered and/or non-registered in the SCA. According to businesses, particularly those operating in the agritourism or rural areas, municipalities are passive in consolidating their inventory of properties and initiating the registration of their properties. In its 2019 analysis, the Secretariat evidenced the reasons for this, such as: their inability to prepare relevant documentation due to the lack of licensed topographers in the territory under their jurisdiction; limited financial resources to cover application procedures and associated fees at the SCA; a lack of interest in developing certain assets, many of which are degraded and hold limited economic value by the private actors.

II.5 LEVERAGING MOMENTUM TO ACCELERATE PROPERTY RIGHTS- NATIONAL REFORM AGENDA 2024-2027¹²

The first objective of the National Reform Agen-

da (NRA) is to consolidate reforms that support Albania's further transformation into a sustainable and competitive economy, guided by transparent economic governance, efficient infrastructure, and a favourable legal framework for attracting investment and increasing exports, in alignment with EU acquis and best practices. One of the main initiatives under this objective is foreseen: *"Ensuring transparency and efficiency in cadastral services for investors, businesses, and citizens, alongside comprehensive public policies for land and property management."* A detailed progress on steps envisioned in the NRA and SCA Roadmap on digitalization is provided accordingly in Annex D.

Monitoring and verification of the NRA indicate that SCA has approved both an Integrity Plan¹³ for the institution and the Digitalization Roadmap of the SCA 2025–2028¹⁴. The latter document is even more ambitious with regard to the digitization timelines, aiming to achieve 95% initial registration of cadastral zones by 30 June 2026 and full registration (100% of cadastral zones) by December 2028.

¹³ <https://www.ashk.gov.al/plani-i-integritetit-per-agjencine-shteterore-te-kadastres-2/>

¹⁴ <https://www.ashk.gov.al/wp-content/uploads/2025/07/Udherrefyesi-i-Digitalizimit-te-Agjencise-Shteterore-te-Kadastres.pdf>

¹² <https://saspac.gov.al/agjenda-e-reformave-plani-i-ritjes/>

LEGAL AND INSTITUTIONAL FRAMEWORK

1. CLEAR PROPERTY RIGHTS AS A GUARANTEE FOR THE INVESTORS

Strong and clearly registered property rights in Albania directly correlate with increased domestic and foreign investment, as investors seek legal certainty and reliable property registration. Legal certainty over ownership is essential for attracting and retaining both domestic and foreign investors, ensuring market stability, and strengthening confidence in the country's economic framework. From time to time, the Albanian government has undertaken efforts to provide and extend guarantees for foreign investors, notably through amendments to Law No. 7764/1993 "On Foreign Investments," which in 2010 expanded state guarantees by introducing additional legal protections for investors committing over €10 million and engaged in judicial disputes with third-party private entities, under a Special State Protection mechanism initially

set to apply until 31 December 2014. These protections were further reinforced by subsequent amendments in 2017, which extended the deadline until 31 December 2018 and aligned the regime with Law No. 55/2015 "On Strategic Investments in the Republic of Albania," thereby ensuring that investors granted strategic status could automatically benefit from these enhanced safeguards and expedited procedures. While such interventions have been welcomed by some as a means of enhancing investor confidence and accelerating economic development, they have also been considered controversial, with critics arguing that these measures may give rise to perceptions of favouritism and unequal treatment among investors. While a full resolution of property registration challenges requires long-term reform, immediate and prioritized actions are necessary to enhance legal security, improve governance, and align property reform with Albania's strategic objective of strengthening its investment environment.

2. REFORM IN THE LEGISLATION – EXPECTATIONS VS. ACHIEVEMENTS IN THE VIEW OF THE BUSINESS COMMUNITY

A. Institutional Reform

Law No. 111/2018 “On the Cadastre” created the State Cadastre Agency (SCA) by consolidating several previously separate institutions (cadastre, inventory of state property, legalization of office, etc.) into one body to register all immovable properties and legal rights in a single system. A centralized agency would improve efficiency, reduce overlap, and streamline property rights processes. It aimed to modernize the cadastral system, make all property records consistent and reliable, and support digitization. The SCA was established and is operational, but implementation challenges remain — including delays in completing first registration in some cadastral zones and gaps in legal guarantees (e.g., inconsistent issuance of certificates and requirements for additional documentation).

B. Property registration and digitalization of properties

Full cadastral registration of immovable properties across Albania under a modern digital system was expected to be achieved, completing systematic procedures and replacing fragmented legacy records. Registration was meant to correct historical inaccuracies and provide a reliable national registry. Significant progress has been made, with approximately 90% of cadastral zones having undergone initial registration and digitization of records. However, some cadastral zones are still unregistered. In some areas, cadastral offices still require additional documentation from citizens, reducing the intended simplification of registration procedures.

Law no. 20/2020 “On the Finalization of Transitional Processes on Property” (deriving from the same reform package) was designed to finish transitional procedures such as legalization of informal buildings, issuance of ownership titles, inventory of state and private properties, and resolution of legacy claims. The expectations were to provide a legal framework that would close “transitional” or unfinished property procedures that had persisted since post-communist reforms. The goal was to reduce unresolved claims and bring greater certainty to property legal status. In practice systematic settlement of transitional title issues in practice has slowed down. The process was initially thought to be finished within 2028, but the finalization of the process is expected to last longer.

3. CROSSCUTTING OF THE PROPERTY REGISTRATION REFORMS WITH OTHER REFORMS

A. The mountain package

the “Mountain Package” is a legal and development initiative of the Government¹⁵ aimed at promoting investment in mountainous areas, revitalizing the rural economy, and fostering the development of tourism, agriculture, and local economic activities. The initiative seeks to address development challenges primarily affecting mountainous regions, which face significant difficulties in obtaining construction and development permits due to unresolved land ownership issues, including the lack of accurate cadastral registration for a considerable portion of land. In many cases, land is *de facto* used by individuals or families who do not possess formal ownership titles,

¹⁵ [Law no. 20/2025 and Instruction no.2 dated 15.10.2025](#)

rendering such properties unsuitable for investment and preventing municipalities from registering them as assets for development purposes. The package aims to strengthen social cohesion, support the economic recovery of mountainous areas, increase municipal revenues, stimulate investment, and curb emigration.¹⁶

Through a simplified administrative process, the new law:

- » allows non-owner possessors to obtain legal registration following a simplified verification process conducted by the municipality.
- » permits the transfer of ownership at a symbolic price (e.g. 1 euro) to applicants who present a development plan and obtain the necessary permits.
- » provides tax exemptions for a period of 10 years (including VAT, income tax, and infrastructure tax) for the first 500 applicants.
- » seeks to transform unused land into an active resource for local development.

At present, several municipalities have identified priority areas for the development of the mountain economy within their jurisdictions, which have been officially designated as such through Council of Ministers (CoM) decisions. The practical effectiveness of the procedures provided under the law and the medium-term impact of this initiative are expected to unfold in medium-term.

¹⁶ <https://www.paketaemaleve.gov.al/all/about>

B. Fiscal cadastre – progress without completion

The Fiscal Cadastre is a centralized digital system designed to consolidate property data and support transparent, accurate real estate taxation, particularly for buildings and future market-value-based taxes. Although introduced in 2017, it remained largely non-operational due to incomplete data population by municipalities and delays in integrating key state systems.¹⁷ On several occasions in the past, the Secretariat has followed up the process with General Directorate of Tax Cadastre (GDTC), which has been supportive informing on the reform progress. A 2026 government decision formally established it as a state database, requiring municipalities to use it for building tax administration and enabling better data integration, oversight, and accountability. Although the fiscal cadastre decision itself represents a major step, further legislative reform is underway:

- » A new law on real estate/property tax, aligned with European standards, is being drafted with international assistance (e.g., Swedish partners). It is expected to be approved during 2026.
- » The broader reform will shift Albania from the old system of area-based or average reference prices to a market-value based property tax regime, with complete application planned for 2028 for buildings and 2030 for land.

¹⁷ https://www.investment.com.al/wp-content/uploads/2025/10/Investment-Council_On-Digital-Transformation-of-Public-Local-Services-for-Businesses.pdf

KEY FINDINGS AND ANALYSES

The following section presents the key findings in detail, combining systemic issues identified through Secretariat's analysis with specific concerns raised by the business community during consultations, supported by both quantitative and qualitative data from a tailored survey focused on property registration and digital property services.

- Digital cadastre and demand for more access:** Major improvements have been made to modernize land and property management through full digitalization, transparency, and integration of geospatial data systems. However, as of today the gap between the policy ambition to modernize the property registration system and procedures through a trusted digital cadastre, accessible by individuals and legal entities and its

implementation into practice is still there. The most recent interviews, direct meetings, and focus group discussion confirmed for an increased interest from group of interests (banks, real estate, chambers of commerce, etc.) and maybe from the public and business to access the cadastral data in real-time and verify status of their property/properties.

The 2018–2019 reform envisioned a fully digital, integrated, transparent cadastre system

with fast services and online access. The Digital Cadastre was launched as an attempt to finally address issues related to the transparency and legal certainty by: (i) reducing property disputes by ensuring accurate and verified data; (ii) increase trust in ownership records, and (iii) provide clear legal status for land and buildings. With the approval of Law no. 111/2018 and its completion with by-laws, it has been established the basis for the online digital cadastre for access and use by physical and legal persons, domestic and foreign, to enable the real-time verification of the legal status of an immovable property. Specifically, Article 28, in paragraphs 2 and 3 of the Law provides that: *“Legal or natural persons, domestic or foreign, may be granted access codes and the right to obtain data extracts directly from the digital cadastre, while ensuring, through technical safeguards, the impossibility of its manipulation through the electronic system. The right of access and the issuance of extracts is also provided through the unified multifunctional government portal. Legal entities and individuals who are granted access to the electronic system or to the unified multifunctional government portal can obtain electronic property ownership extracts/documents directly, provided that the consent of the registered owners of immovable property has been obtained.”*

Although the legal framework for cadastre and property registration is in place, property rights remain insecure in practice due to inconsistent records and incomplete registration (which, in fact, remains an ongoing pro-

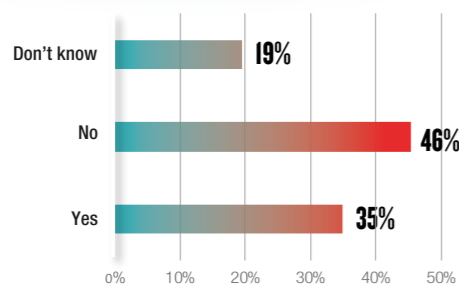
cess), while the cadastral data are not accessible to users including banks or real-estate, who have already shown interest to access Digital Cadastre for financing and property transactions procedures.

The enhancement of access to cadastral data for all the interested parties has been also one of the recommendations of the Special Parliamentary Commission *“On Deepening Reforms for Good Governance, Anti-Corruption, and the Rule of Law for Albania 2030 in the European Union”* as part of the Pillar II – Anticorruption. According to the Analytical Document, Recommendation 3 provides that *“...open access to cadastral data should be ensured by making the immovable property register accessible to anyone who requests information or extracts from it,”* with the aim of addressing the issue also from the perspective of preventing corruption in the administration of property rights.

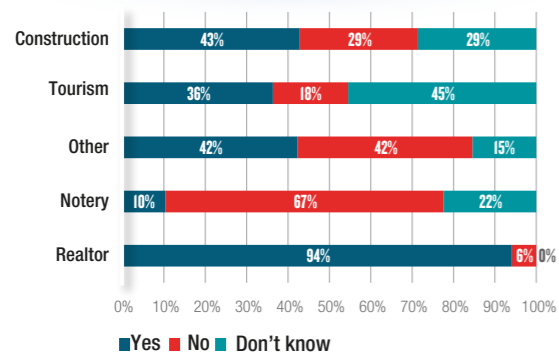
- Expanding access to a broader range of professional sectors could enhance overall efficiency and coordination, supporting faster and more effective service delivery across the system.** This approach is supported by our recent survey results, which indicate that 35% of companies recognise the need to broaden access to the SCA database beyond notaries to include other key stakeholders. The goal is to enhance efficiency, accelerate processes, and improve institutional coordination. These stakeholders include financial institutions (such as banks), and real estate intermediaries.

Figure 1. Access to SCA database

Do you think that besides notaries, other parties can also have access to the SCA database to verify in advance the status of your property (with your consent):



Do you think that besides notaries, other parties can also have access to the SCA database to verify in advance the status of your property (with your consent):



Source: Secretariat Survey, March 2026

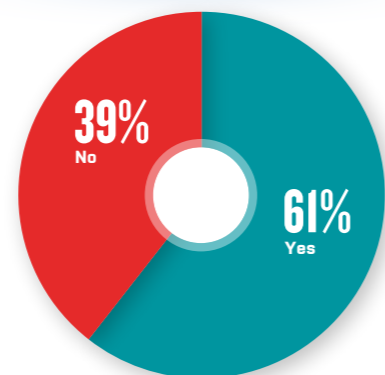
3. Need for unified cadastral procedures and documentation for complex services and respective applications. Based on their experience and concrete cases, businesses report that the current business workflow would benefit from more

standardised operational manuals on how to apply in cadastral services, mandatory checklists for services, rather than relying solely on what is currently available on e-Albania. Implementing standardized checklists and consistent naming conventions for official replies will streamline the process. This alignment will minimize procedural uncertainty, reduce administrative costs for the private sector, reduce turnaround times and significantly accelerate service delivery.

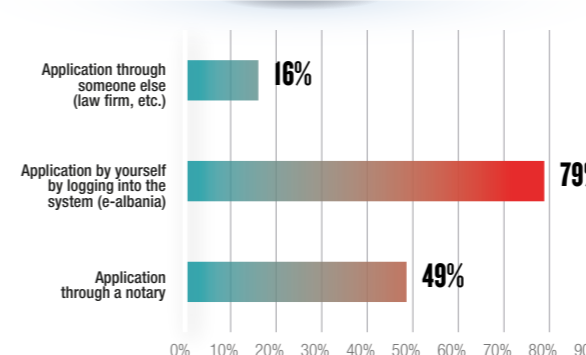
4. Repeated payments suggest clearer guidelines, more consistent procedures, and improved transparency to reduce unnecessary costs for companies. Three out of five companies report having paid more than once for the same service, and the trend persists regardless of whether the application was submitted by experts or not. Overall, companies that applied independently through e-Albania tend to have a higher percentage of repeated payments.

Figure 2. Repeated payments

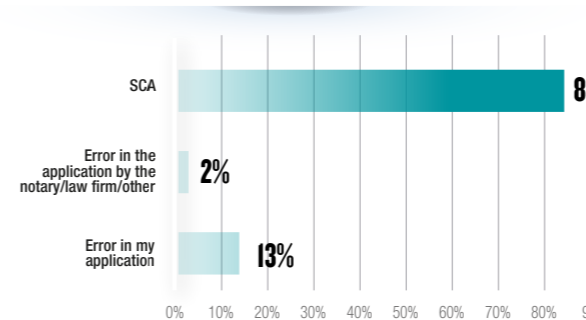
Have you paid fees more than once for the same service?



Have you paid fees more than once for the same service? Yes



If so, is this because of?



Source: Secretariat Survey, March 2025

Most companies (84%) state that these repeated payments are mainly due to issues related to SCA and a lack of clear information provided to the public. They emphasize that, during the process, additional documents are often requested beyond the initial requirements, information is unclear or inconsistent, and there are changes in procedures. These factors collectively lead companies to make multiple payments for the same service.

5. While the applications via e-Albania and notaries have been streamlined in terms of speed of application, a formalised performance monitoring framework could be used to ensure that applications are qualitatively processed within the deadlines. Businesses reported delays in procedures concerning property registrations, unclear deadlines for the completion of procedures, leading to a perceived inefficiency in cadastral services and an unsatisfactory customer experience. By building on the improvements introduced with the tracking number, the Cadastre Agency can further define the completion deadline and standardise processing timelines for complex service types.

6. Current cadastral service fees are largely administrative in nature. Introducing a more transparent fee structure could enhance the level of transparency that SCA aims to achieve. As of today, there is not any published any methodology on how the cadastral fees are determined. According to the law no. 111/2018 “On Cadastre”, Article 63, “Every cadastral service offered, except for special cases provided for in this law, is subject to a fee.” The cadastral fees are determined by CoM Decision no. 389, dated 13.5.2020 “On the Approval of the List and Fees for Cadastral Services” (as amended by Decision No. 1177, dated 24.12.2020; and No. 462, dated 31.7.2025). Neither the law nor the decision provides for a list of principles or a detailed methodology on how cadastral fees are deter-

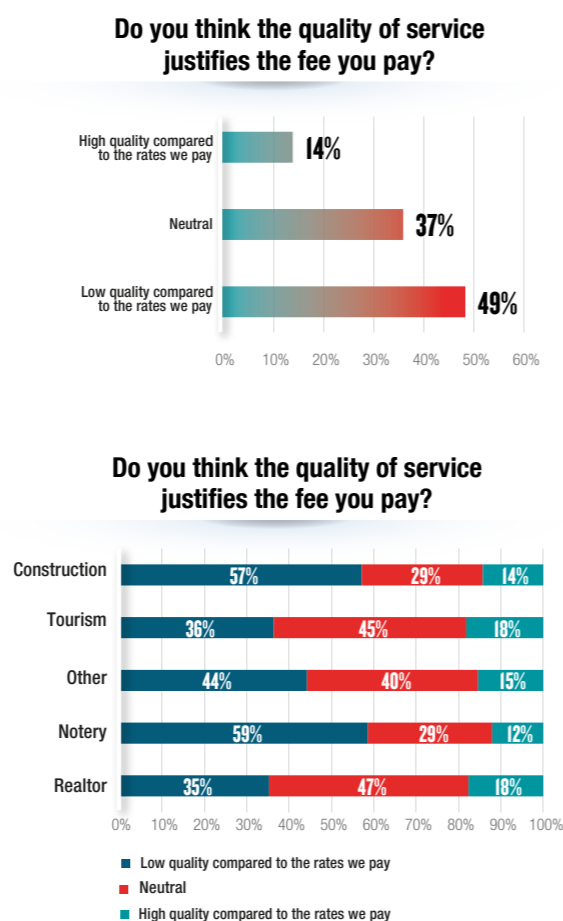
mined. Instead, it only determines a list of applications and the corresponding fees, which appear to somehow broadly reflect the complexity of the applications and the back-office resources required, but without specifying the underlying principle applied. In addition the decision sets out the list of entities exempted from cadastral service fees such as the Prosecutor's Offices, the State Police, institutions responsible for the transitional re-evaluation of judges and prosecutors; the authority responsible for declaration and control of assets; the financial intelligence authority responsible for preventing money laundering; the authority responsible for managing seized and confiscated assets, and the State Attorney. According to the law, such fees are subsidized by the state budget.¹⁸

Without prejudice to differing views on the level of applicable fees—some stakeholders considering them high and others reasonable—enhancing transparency in their determination and structure would contribute to greater accountability.

7. According to the survey data, nearly one in two surveyed companies consider the quality of the service to be inadequate in relation to the fees paid. Meanwhile, only 14% of companies believe that the quality of the service justifies the fees. This trend is also reflected among notaries.

¹⁸ Article 63, paragraph 3: "For each service exempt from a fee, the Council of Ministers decides on the compensation of the fee from the state budget funds."

Figure 3. Perceived Cost – Quality Mismatch



Source: Secretariat Survey, March 2025

8. Concerns have been raised regarding the legal validity of cadastral acts issued solely with an electronic seal. The Albanian Association of Banks (AAB) has raised concerns regarding the legal validity of cadastral acts automatically generated by the cadastral system. According to the Instruction no. 682 of the General Director of Cadastre, dated 30.05.2025, "On the approval of the model of the request for cadastral services and standard procedures for operations with the

register," it is stipulated that cadastral acts generated automatically and bearing only an electronic seal, and made available to citizens, are fully legally valid and do not require an electronic signature.

AAB has conveyed the concerns raised by the banks in Albania that this provision is inconsistent with the provisions of the Law "On Electronic Documents" and the Law "On Electronic Signatures," which explicitly require the use of a qualified electronic signature for electronic documents to ensure their full legal validity and probative value. In addition, the requirement for an electronic signature is also set out in CoM Decision No. 782, dated 07.10.2020 "On the approval of models of cadastral acts and data contained in the cadastral map." Given the form of an administrative act is a mandatory element of its validity and legality, the issuance of cadastral acts without the required formal elements may expose banks and citizens to potential legal disputes regarding collateral and the legitimacy of documents.

The Secretariat analysed and verified the above legal basis and provisions and notes a clear discrepancy between paragraph 12 of Instruction No. 682¹⁹ and the legislation in force governing electronic signatures,²⁰ more specifically with Article 4 et seq. of Law 9880, dated 25.02.2008 "On Electronic Signature" (as amended²¹ and

¹⁹ Regarding cadastral data, the request for cadastral services does not go through the stages described in point 8 of this Instruction, as the cadastral act is generated automatically with an electronic seal, bearing the note: "This document has been generated and sealed through an electronic procedure by an automatic system (State Cadastre Agency)" and has the same legal validity and probative force as any other official document.

²⁰ The law no.10273 dated 29.04.2010 "On Electronic Document" (as amended) is repealed via the law 43/2023 "On Electronic Governance"

²¹ <https://aksk.gov.al/wp-content/uploads/2023/07/liqj-2008-02-25-9880.pdf>

with the provisions of the CoM Decision no.782. An electronic document to be legally equivalent to a written and physically signed document, must, in addition to meeting other requirements, bear a qualified electronic signature. During the Focus Group Meeting held on 7 April 2026, the SCA informed participants that this issue will be addressed through amendments to the CoM Decision no. 7682, dated 07.10.2020 "On the Approval of Models of Cadastral Acts and the Data Contained in the Cadastral Map."

9. Concerns related to the operational aspect of cadastral services have been identified by NAREA. According to NAREA, the following issues have been identified in practice: (a) property records often lack data on common or shared areas; (b) there are unregistered property titles; (c) there has been a significant increase in application costs within the State Cadastre; (d) some applications have been deactivated; (e) ambiguities and inaccuracies persist in cadastral maps; (f) property documents issued after 2020 contain missing data (such as page, volume, and percentage of land ownership); and (g) the merging of applications has increased administrative costs (e.g. the property card service has been combined with the cadastral map service, which has increased (doubled) the costs of the service without a clearly stated justification.

In addition to the above, NAREA reports a systemic issue stating that: "The property card does not contain the value of the property (purchased or even assessed/reassessed value), with the relevant field instead recorded as '0'. This creates ambiguity in transaction processes and leaves room for informal or fictitious transactions."

The Secretariat has analysed the concern. According to Article 13, paragraph 3 of Law no. 111/2018 “On the Cadastre,” the “*value of the property*” is a mandatory element of the property card. This requirement is also stipulated under the provisions of the CoM Decision no. 782, dated 7.10.2020 “On the approval of models of cadastral acts and the data contained in the cadastral map”, Annex 1. Therefore, while the concern is already addressed in the legal framework, it should be resolved at the operational level by the SCA.

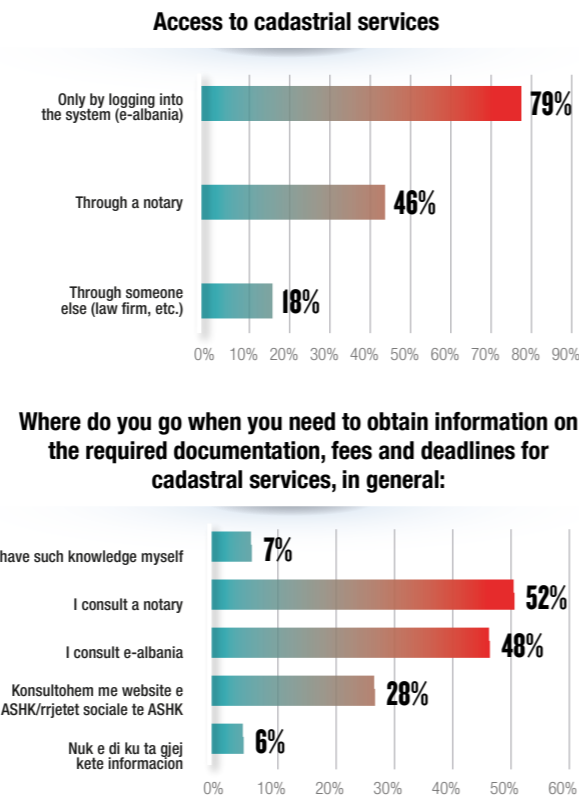
10. Other issues concerning the development of the property market relate to the fact that **reference prices often do not reflect market realities**. The Methodology for Reference Prices of Agricultural Land should be revised, as significant discrepancies persist between administrative prices and actual transaction prices.

11. **Communications and access to information - Companies show a strong reliance on notaries for information on documentation, fees, and deadlines for cadastral services.** About 52% prefer consulting notaries, indicating higher trust in the clarity and accuracy of information provided. In comparison, 48% obtain information through the e-Albania platform, while only 28% use official sources of the SCA. *This suggests that, although official channels are available, there is a need to further enhance clarity, accessibility, and content of official information provided by SCA.*

The data indicate that the use of digital platforms to access cadastral services is relatively high, with 79% of companies reporting that they independently log into the electronic system (e-Albania) to obtain services. At the same time, 46% still rely on notaries as intermediaries,

showing that many businesses use a combination of digital and traditional service channels.

Figure 4. Information Channels and Access to SCA Services

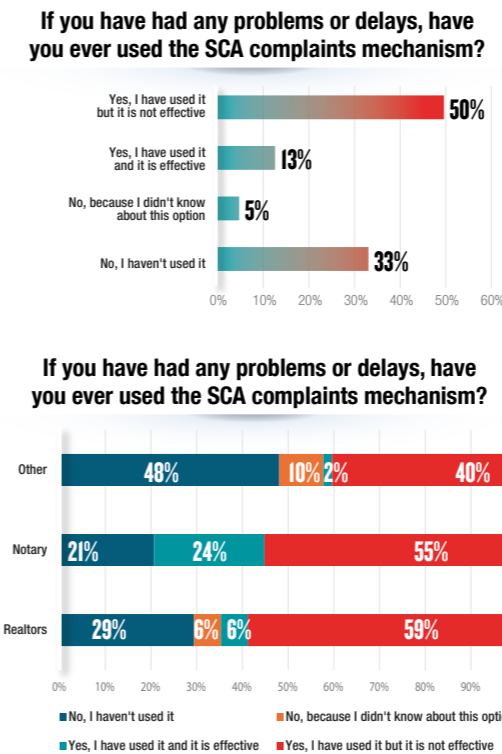


Source: Secretariat Survey, March 2025

12. **Feedback and complaints system - Overall, the SCA complaints mechanism is known among businesses but is perceived as ineffective by those who have used it.** Approximately 60% of companies report awareness of the SCA complaints mechanism. This mechanism appears to be more widely known and more frequently used by experts, such as notaries and realtors, compared to other businesses, which demonstrate lower levels of awareness and usage. This perception is consistent across

both experts (notaries and realtors) and the broader business community.

Figure 5. Feedback and Complaints System



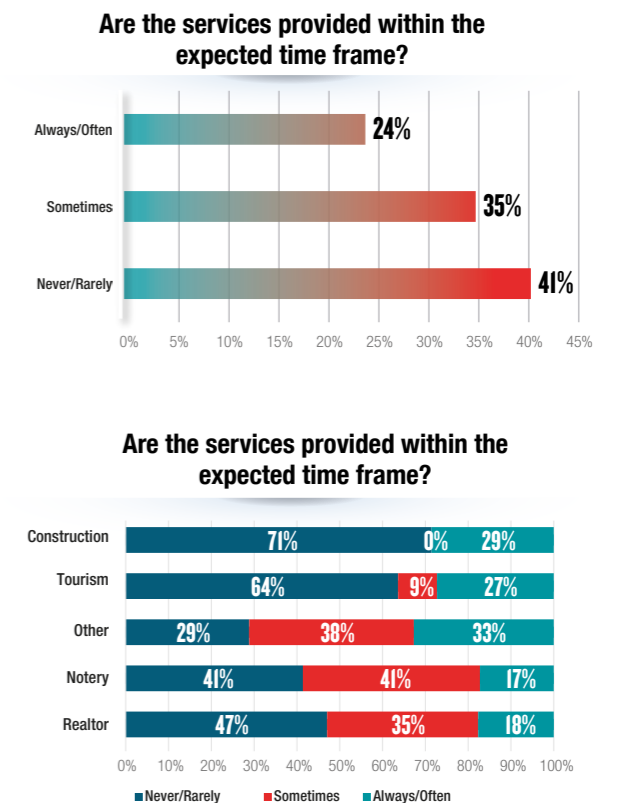
Source: Secretariat Survey, March 2025

The focus group discussion confirmed participants' awareness and utilization of the grievance channels; however, they expressed dissatisfaction with the responses or solutions provided. The SCA representative further explained the available channels for concerns and grievances, clarifying that the SCA could only address issues within its own mandate and operational scope. Accordingly, many of the unsatisfactory responses relate to matters outside the SCA's competence and authority.

13. **Findings suggest that a significant share of users experience delays or inconsis-**

tencies in service delivery timing, indicating a need for improved efficiency and more reliable adherence to deadlines. 4 out of 10 companies believe that SCA services are not delivered within the expected timeframe. Meanwhile, around 2 out of 10 companies state that they receive the services on time, while the remaining companies report that the services are sometimes delivered within the required deadlines. This trend is also consistent among experts.

Figure 6. Service Delivery Timeliness (Deadlines)



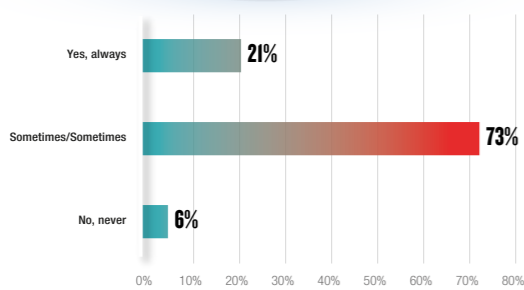
Source: Secretariat Survey, March 2025

14. **Frequent and, at times, inconsistent requests for additional documentation suggest the need to improve clarity, trans-**

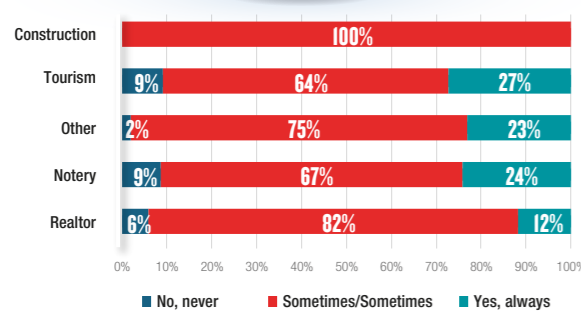
parency and reduce uncertainty in the application process. 1 out of 5 companies report that the SCA consistently requests additional documentation beyond what was initially required. Meanwhile, 7 out of 10 companies state that in some cases, the SCA requests supplementary documents that differ from those originally published at the time of application. Participants in the Focus Group Discussion indicated that such additional documents are typically requested for complex applications and are often due to gaps in historical documentation within the SCA archive.

Figure 7. Requests for additional documentation

Is additional documentation required other than those published and requested at the time of the initial application?



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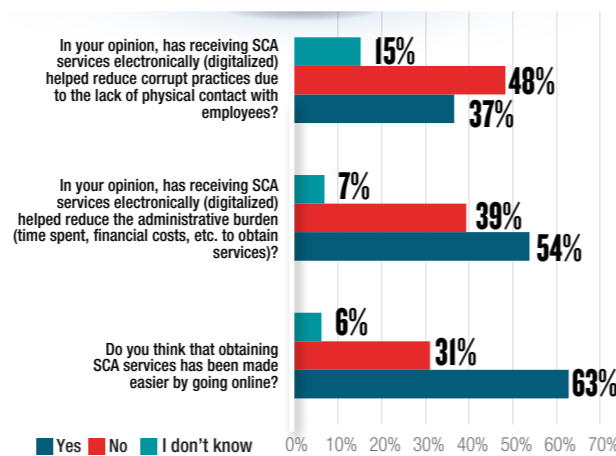


Source: Secretariat Survey, March 2025

15. While digitalization is widely recognized as improving efficiency and reducing administrative burdens, the perception that digitalisation has reduced corruption remains limited, highlighting the need to strengthen integrity measures. The SCA should therefore ensure rigorous and effective implementation of the recently approved Integrity Plan.

Most companies view digitalization positively, with 63% perceiving that it has simplified procedures and service delivery. Additionally, 54% report a reduction in the administrative burden because of this process. However, only 37% believe that digitalization has contributed to reducing corruption, indicating that this remains an ongoing concern.

Figure 8. Impact of digitalisation

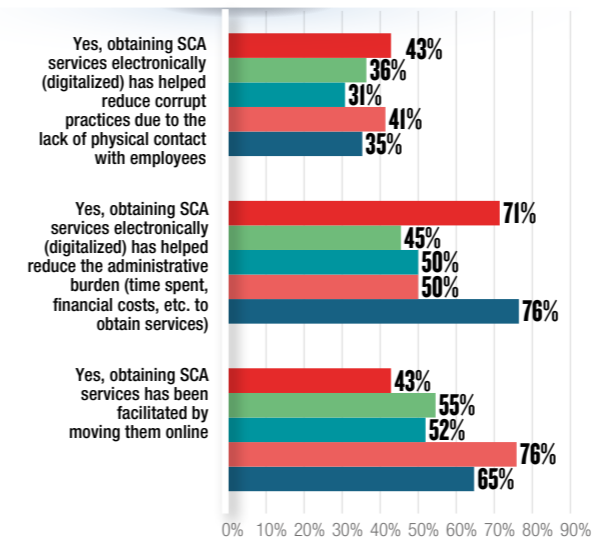


Source: Secretariat Survey, March 2025

Notaries, to a large extent (76%), state that the shift to online services has significantly facilitated the process of obtaining services.

Similarly, 76% of real estate professionals indicate that digitalization has led to a reduction in administrative costs. Nevertheless, a smaller share of businesses perceive that digitalization has reduced corrupt practices, suggesting that its impact in this area is still seen as limited.

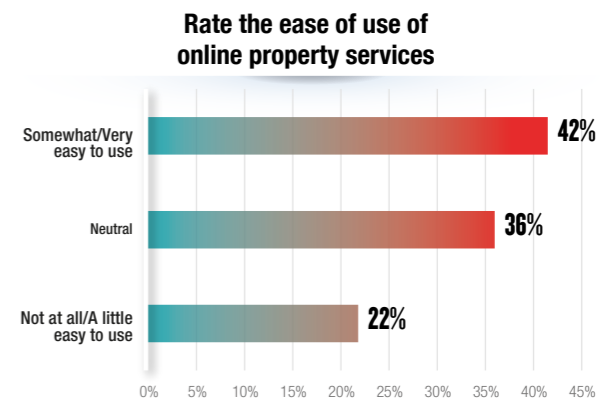
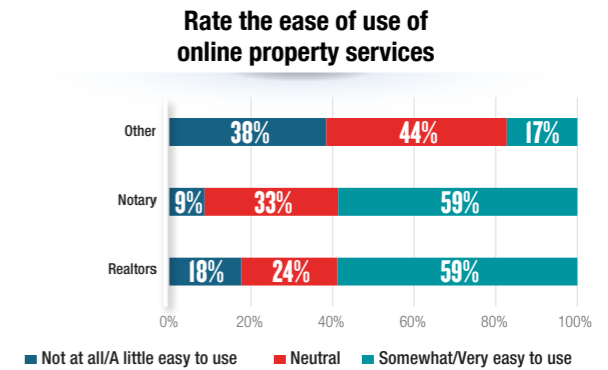
Figure 9. Impact of digitalisation – Experts



Source: Secretariat Survey, March 2025

16. While professionals find the procedures straightforward, many businesses experience difficulties, indicating a need for greater clarity and better guidance to ensure accessibility for all users. Experts, including real estate intermediaries and notaries, largely consider the application procedures for digitalized cadastre services to be clear and easy to follow, while 38% of other businesses perceive these procedures as a little easy or not easy at all and therefore need expert assistance.

Figure 10. Ease of using digital services

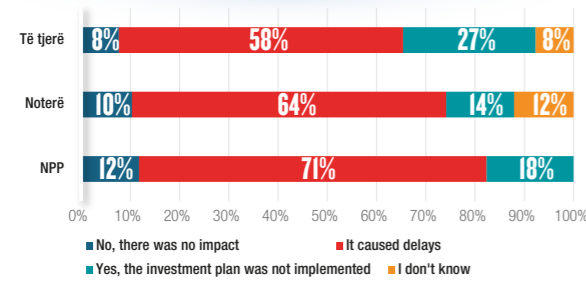


Source: Secretariat Survey, March 2025

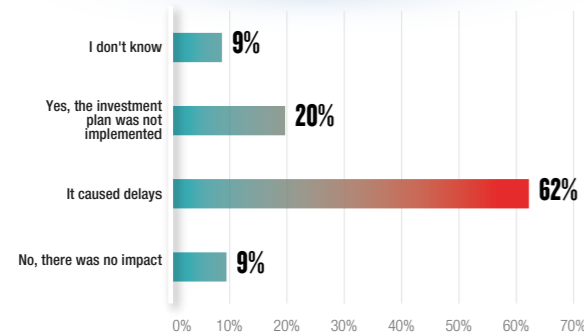
17. Incomplete property registration processes, as well as inaccurate land and property documentation, represent significant barriers to investment, directly affecting the business climate and economic development. 61% of companies report that they have experienced delays or even failed to realize their investment plans due to registration processes or inaccuracies in documentation provided by the SCA.

Figure 11. Impact on Investment

Have there been delays or non-implementation of investment plans due to registration processes or inaccurate land/property documentation?



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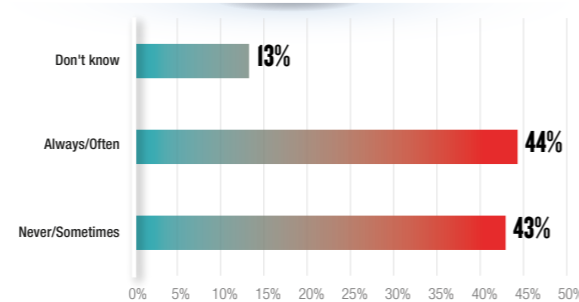


Source: Secretariat Survey, March 2025

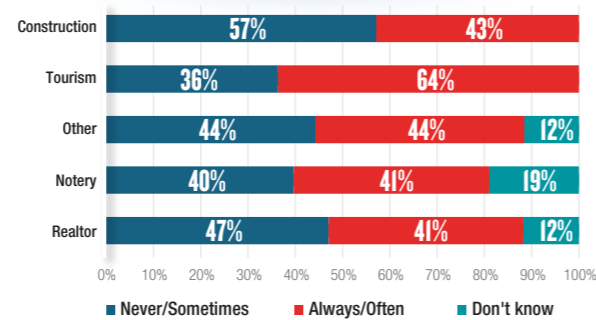
18. Institutional coordination remains an area in which a significant share of businesses experience challenges, suggesting the need for improved alignment and cooperation between institutions. Businesses are divided regarding the impact of institutional coordination on delays or issues related to SCA services. 44% of companies state that they experience delays and problems are due to weak institutional coordination, while 43% report that this coordination has not caused any delays in this regard.

Figure 12. Institutional Coordination

Have you had any delays or problems due to poor coordination between SCA and other state institutions (municipality, taxes, etc.)



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Source: Secretariat Survey, March 2025

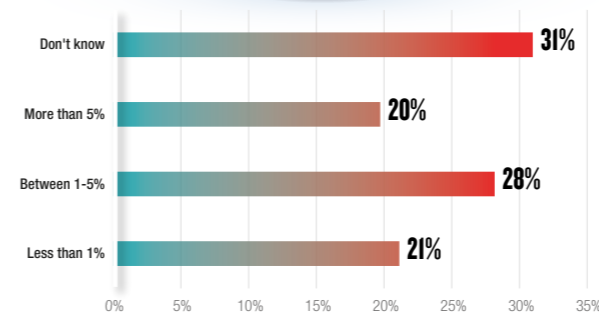
During the focus group discussion, the representative of the Agrotourism Association highlighted the sector's concerns, primarily about municipalities leasing unregistered land and holding inaccurate documentation, leading to a lack of financing and hindering further expansion and development of the sector.

19. 1 in 5 companies report that administrative fees (formal and informal) account for more than 5% of their investment. This indicates that administrative costs can represent a significant financial burden for a notable share of companies, potentially affecting investment decisions and overall business activity.

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Figure 13. Administrative fees as percentage of total investment

Excluding the purchase or rental price, what percentage of the total investment is usually taken up by formal and informal administrative fee costs (various permits, property registration, including survey plans or legal consultancy)?

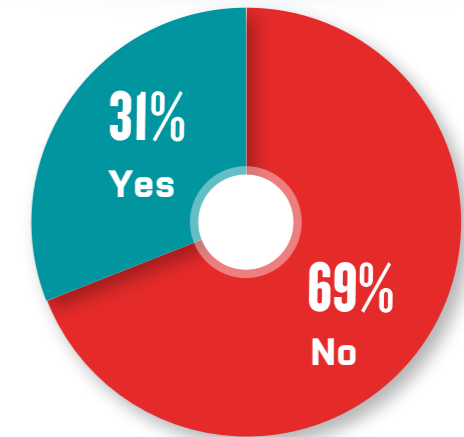


Source: Secretariat Survey, March 2025

20. Regarding interactions with banks, only 3 in 10 companies report having been rejected due to incorrect property titles or incomplete documentation. **While this suggests that most companies can meet basic banking requirements, the rejection rate remains notable, indicating that documentation quality and title accuracy continue to pose challenges for a significant minority.** Eliminating these documentation challenges will mitigate delays in accessing financing, additional administrative costs, and the need for repeated submissions or corrections, ultimately affecting business operations and investment timelines.

Figure 14. Interactions with banks

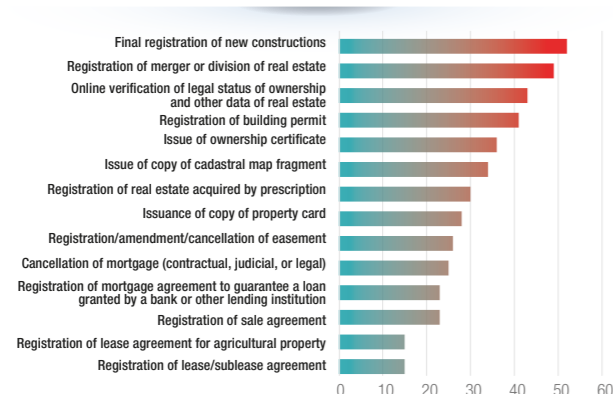
Has a bank ever rejected your collateral property due to incorrect title or documentation?



Source: Secretariat Survey, March 2025

21. According to the questionnaire data, the services most frequently perceived as problematic include the final registration of new constructions, the registration of property mergers or divisions, and the online verification of the legal status of property ownership. The first two services involve complex procedures, multiple steps, and data synchronization, making them particularly sensitive to inconsistencies and delays, especially in relation to standardization and performance monitoring. The online verification, by contrast, is linked to digitisation and access issues. In comparison, services such as the registration of lease or sublease agreements, sale contracts, and mortgages used as loan collateral are generally considered less problematic.

Figure 15. Evaluation of specific services
Cadastral service most commonly
perceived as problematic



Source: Secretariat Survey, March 2025

Based on the above analyses, it can be summarised that key issues requiring prioritisation from a private sector perspective relate to the following pillars: (i) the level of access to digital cadastre; (ii) standardisation of operational manuals and mandatory service checklist; (iii) enforcement of monitoring mechanism; (iv) accountability through more transparency; (v) the quality of property cards in line with legal framework requirements; (vi) inter-institutional coordination; and (vii) better alignment of administrative agricultural land prices with current market prices.

In this perspective, the following recommendations are proposed.

RECOMMENDATIONS

RECOMMENDATION 1:

Standardised Procedures and Documentation²²- Develop and publish unified, mandatory operational manuals and comprehensive checklists for all cadastral services, ensuring consistent application across all regional offices. Introduce and enforce standardised terminology for official responses issued by cadastral offices to minimize procedural uncertainty, reduce administrative costs, and significantly improve the speed and efficiency of service delivery.

²² Businesses report a lack of standardised operational manuals and mandatory checklists. Seven out of ten companies state that the SCA sometimes requests additional documents that differ from those originally published at the time of application. This ambiguity and inconsistency contribute to repeated payments for the same service, as reported by three out of five companies.

RECOMMENDATION 2:

Assessment of the feasibility of broader Digital Cadastre Access²³- Conduct an evaluation of the potential to introduce direct access codes to the digital cadastre for selected professional users, in order to facilitate timely due diligence and collateral verification. The assessment is advised to focus on three fundamental pillars: i) the current status of cadastral data, ensuring it provides certainty and reliability; ii) the applicable legal framework governing personal data protection; and iii) data security and system integrity.

²³ Access to up-to-date cadastral information is essential for effective due diligence. Although Law No. 111/2018 provides for access codes for "selected users," there is currently no structured mechanism enabling financial institutions (banks) or real estate agents to directly obtain cadastral data for collateral verification purposes. Furthermore, 35% of companies recognise the necessity of expanding access beyond notaries.

RECOMMENDATION 3:

Transparency of Service Fees²⁴- Enhance transparency in the fee structure by publishing a clear methodology or set of guiding principles that explain how cadastral fees are determined.

Recommendation 4: Improve Official Communication Channels²⁵- Enhance the clarity, accessibility, and content of official SCA information available on e-Albania and the SCA website. Leverage the new Communication Strategy to proactively publish unified information on service fees, deadlines, and documentation requirements to reduce business reliance on intermediaries.

RECOMMENDATION 5:

Implement the Integrity Plan and Accountability Measures²⁶- Rigorously and effectively implement the recently approved SCA Integrity Plan to strengthen anti-corruption measures. Develop a unified and standardized methodology for evaluating staff performance, linking individual staff achievements to institutional targets (e.g., service delivery deadlines, quality outcomes, and integrity standards).

24 Approximately 50% of surveyed companies perceive the quality of service as inadequate relative to the fees charged. Additionally, there exists a lack of transparency in the fee structure, as no published methodology for determining cadastral fees is available.

25 Businesses rely heavily on notaries (52%) for information on documentation, fees, and deadlines, compared to official SCA sources (28%). This suggests official channels need further clarity and accessibility.

26 Only 37% of companies believe digitalisation has contributed to reducing corruption. Although SCA has approved an Integrity Plan, a unified methodology for evaluating staff performance in relation to institutional targets is still missing.

RECOMMENDATION 6:

Introduce Private Sector Participation in Reform Monitoring²⁷- Formalise the inclusion of private-sector representatives (e.g., business associations and experts) in the institutional structure for property reform governance (such as the Inter-Ministerial Committee or technical working groups) to ensure that reform efforts are directly responsive to stakeholder needs and concerns.

RECOMMENDATION 7:

Strengthen Complaint and Grievance Mechanisms²⁸- Create a practical mechanism and an interactive platform for monitoring requests and managing complaints. Ensure that the mechanism guarantees substantive and timely responses to complaints and tracks compliance with legally mandated deadlines.

RECOMMENDATION 8:

Active Coordination in Registration of Public and State Properties²⁹- Establish ad hoc, dedicated working groups, allocate specific budget lines, and require structured, periodic reporting on the progress in the registration of state properties. Strengthen inter-institutional coordination to overcome municipal passivity,

27 The institutional structure for property reform governance (Inter-Ministerial Committee, technical working groups) does not formally include private sector or civil society actors (an unimplemented previous IC recommendation).

28 The SCA complaints mechanism is perceived as ineffective by businesses, who express dissatisfaction with the responses provided. FIAA proposed a Monitoring Committee and an interactive platform to oversee requests and ensure compliance with deadlines.

29 Based on the interviews and the focus group conducted Institutional coordination remains weak, and municipalities are passive in consolidating and registering their state-owned properties. This delay creates uncertainty regarding ownership and administration of these assets and limits financing opportunities, particularly in agritourism industry.

and engage with stakeholders from business associations (e.g., agrotourism), to prioritise the registration process on development needs and geographic location.

RECOMMENDATION 9:

Strengthening Legal Certainty of Cadastral Data³⁰- Issue a mandatory internal SCA instruction clarifying the operational requirement to accurately record the property's value (purchase, assessed, or reassessed) on all property cards during the processing of daily applications. Introduce system controls within the digital cadastre to prevent the issuance of a property card if the mandatory "value of the property" field is left blank or entered as

"0" without proper legal justification. In addition, assess the scope and severity of the issue and implement a structured data correction exercise by updating existing records where the value is missing, using verified transaction data or official valuation methodologies.

RECOMMENDATION 10:

Development of a Methodology for Reference Prices of Agricultural Land - Develop and adopt a clear methodology for determining reference prices of agricultural land to ensure closer alignment with market realities, particularly addressing the significant differences between administrative prices and actual transaction prices.

30 While the ongoing processes of first registration and digitisation are progressing, concerns remain regarding the completeness and the accuracy of the historical cadastral documents. One systemic issue reported by real estate professionals' concerns missing or incorrect information on the "property value" in the property certificate, despite being a requirement of Law No. 111/2018 and CoM Decision No. 782. This issue creates ambiguity in transaction processes.

ANNEX A – Open Access To Property Registry Data

Making land registry data “open”, accessible to the public digitally, is a major goal for many governments to boost economic transparency and innovation. However, this transparency must be balanced against individual privacy and security concerns.

1.1 Pros of Open Land Registry Data

Transparency & Accountability: Helps citizens and professionals track land ownership and the distribution of public subsidies (such as agricultural payments), thereby deterring corruption and improving governance.

Faster Transactions: Eliminates the need for manual browsing of physical “historical land and ownership data,” thereby reducing delays for professionals such as notaries and real estate agents.

Market Efficiency: Provides symmetric information for buyers and sellers, helping them ver-

ify asking prices and make quicker, better-informed decisions.

Fraud Prevention: Publicly accessible records make it harder for fraudsters to impersonate owners or sell properties they do not own, as ownership can be verified instantly.

Economic Growth & Innovation: Fuels the “Prop-Tech” industry, enabling companies to develop apps and AI tools that streamline conveyancing, due diligence, and property development.

1.2 Cons of Open Land Registry Data

Privacy Concerns: Once a property is registered, the owner’s information and the property’s valuation become part of the public record. While the transparency of land registries is considered a public interest, this raises concerns about the privacy of personal data. This issue could be mitigated by implementing restrictions that prevent “profiling”—a list of an individual’s assets.

Administrative Effort: Accuracy is essential for digital utility. Preparing old, complex, or inconsistent historical land and ownership data for digital release requires administrative and technical processes, as well as legal assistance.

Cost of Implementation: Transitioning to and maintaining a high-quality digital open data system necessitates substantial government funding and robust infrastructure.

Security Risks: Although it mitigates certain instances of fraud, digitizing large volumes of ownership data may introduce new vulnerabilities, including large-scale data breaches or cyber-attacks.

Risk of Misinterpretation: Without technical or legal expertise, public users might misinterpret complex data points, such as boundary lines or restrictive covenants, leading to unnecessary disputes.

1.3 European practices

European practices concerning open land registry data are characterized by a notable tension between the European Union’s advocacy for a digital internal market and the stringent privacy laws of member states. While the European Union encourages transparency to promote cross-border investment, there is no unified “European system”; rather, practices vary considerably across national legal traditions.

European countries generally fall into three categories regarding data accessibility:

Open & Transparent: Data is broadly accessible to the public, often for free or a nominal fee (Norway, Sweden, Estonia);

Intermediate / Fee-based: Access is open to all, but typically requires a fee per search to deter mass scraping and recover costs (Netherlands, France, Spain);

Restrictive: Access is strictly limited to those who can prove a “legitimate interest” (e.g., being a neighbor, buyer, or creditor) to protect owner privacy (Germany, Austria, Cyprus)

2. COUNTRIES WITH ADVANCED LAND SYSTEMS AND ACCESS PRACTICES IN THE REGION (CROATIA & SERBIA)

In both Serbia and Croatia, cadastral and ownership data are predominantly accessible through centralized digital platforms that have undergone significant modernization in recent years.

2.1 Cadastral and Ownership Platforms

Croatia: Manages property through two separate but increasingly integrated registers: the Cadastre (technical/spatial data) and the Land Registry (legal ownership). The main portal: Uredena zemlja (Organised Land) serves as a “One Stop Shop” for both registers.

Public Search: Anyone can search for land registry extracts and cadastral plans without logging in, provided they have the plot or file number.

Official Documents: Digitally signed, legally valid documents (like possessory sheets or land registry extracts) can be obtained via the e-Citizens (e-Gradani) portal.

Innovation: A Virtual Assistant was launched in late 2024 to help citizens check case statuses and generate documents more easily.

Serbia: Similarly to Albania, it utilises a unified Real Estate Cadastre that combines land and property rights.

Main Portal: GeoSrbija is the primary digital platform for geospatial and property data.

e-Cadastre Public Access: Allows users to

search for property data by parcel number or address.

Public Data: Basic info on properties and rights holders (name and address) is available without a login.

Registered Access: Professional users (banks, notaries, appraisers) can access extended databases with more detailed info.

Property Price Register: A publicly available tool that tracks real estate transaction prices across Serbia to increase market transparency.

2.2 Access Levels

Croatia focuses on integrating its Joint Information System (ZIS) with other business-critical systems:

Authorised User Portal: Lawyers and notaries have dedicated access to the Organised Land (Uredena zemlja) system to submit electronic requests for land registry entries, a streamlined workflow not available for standard public searches.

Transparency for Investment: Specific services are tailored for “special business zones,” allowing companies to optimise land disposition and calculate utility or fiscal charges more efficiently.

In Croatia, the “Authorised User” status is deeply integrated with the national e-Citizens and e-Business infrastructure. Access is designated for notaries, lawyers, authorised surveyors, and certain financial institutions.

Authorised users, like notaries, can issue legally valid extracts, copies, and transcripts that are not available through the basic “view-only” public search.

Serbia: While basic property info is free for everyone, the Republic Geodetic Authority (RGZ) provides a tiered access model:

Public Access: Citizens can search by parcel number or address to see basic data.

Professional/Registered Access: Businesses (banks, real estate agencies, insurance companies) and professional users (notaries, geodetic organisations) can enter into agreements to access an extended database.

Search by Owner: Only registered professional users can search the database using the name of a property rights holder or a unique ID number (like a PIN/registration number), a feature restricted for the general public due to privacy.

Official Document Issuance: Certified geodetic organisations and notaries can issue extracts directly from the database, which carry the same legal weight as those extracted from the owners.

2.3. GDPR/Data Protection rules

In both Serbia and Croatia, the legal framework for property data is a balancing act between the principle of public registers (transparency of ownership) and GDPR and Other Data Protection laws (privacy of natural persons).

PUBLIC INTEREST VS. PERSONAL PRIVACY

While land registries are historically public to ensure legal certainty in real estate transactions, modern data protection laws restrict how that data is accessed:

Publicity Principle: Anyone can see who owns a property if they have the specific parcel number or address. This transparency is considered a “public interest” that outweighs individual privacy for the purpose of legal transactions.

GDPR Restriction: You generally cannot search for an individual by name in the public interface. Doing so would allow for “profiling” or the cre-

ation of a comprehensive list of a person’s assets, which is a violation of the purpose limitation and data minimisation principles under GDPR.

NATIONAL ENFORCEMENT & COMPLIANCE

Croatia: Fully aligned with EU GDPR through the Act on the Implementation of the General Data Protection Regulation. The supervisory authority, AZOP, actively monitors the land registry (ZIS) to ensure that automated “scrapers” or unauthorised bulk data collectors are blocked.

Serbia: Serbia’s Law on Personal Data Protection (ZZPL) is largely a translation of GDPR. While enforcement has historically been “softer” with lower maximum fines (~€17,000 compared to the EU’s €20M), the 2023–2030 Data Protection Strategy is moving toward strict alignment with EU penalty levels.

LEGITIMATE INTEREST FOR BUSINESSES

For a business to access the “Professional” level of data, it must demonstrate a specific legal basis under GDPR Article 6:

Banks/Insurance: Need the data to assess collateral or verify assets for a loan.

Lawyers/Notaries: Need the data to draft legally binding transfer agreements.

Public Utilities: Need the data to identify the correct party for billing or legal claims.

Unauthorized use, such as utilizing cadastral data for unsolicited marketing, constitutes a serious breach and has led to substantial fines in Croatia for agencies engaged in unlawful processing of personal data.

3. OTHER NEIGHBOUR COUNTRIES

Montenegro operates under a “principle of pub-

licity,” providing high transparency through the e-Katastar portal.

Public Access: Basic property deed data can be checked online in a few steps by anyone.

Professional Access: While everyone can inspect data, “legitimate legal interest” is required for more detailed documentation. Agents use these records to verify the Real Estate List for encumbrances like bank liens or border disputes.

Kosovo (KCA) has recently enhanced public and professional access.

Public Access: The State Geoportal provides free access to address data and cadastral maps.

Professional Access: Recent reforms aim to facilitate easier access to property ownership and transaction price data for authorised users. Professional access for agents is often managed via the e-Kosova platform.

North Macedonia: Access is managed by the Agency for Real Estate Cadastre (AREC).

Public Access: General information about land parcels and boundaries is available through the national spatial data infrastructure.

Professional Access: Licensed professionals can access the Geodetic Cadastre Information System to download web-based data, including property rights registration and changes.

4. FEE COMPARISON FOR STANDARD SERVICES

In the Western Balkans and Croatia, application fees for standard cadastral services are increasingly integrated into unified digital portals. By April 2026, most countries have shifted to a “fee-per-service” model accessible online, though complex procedures like property division still require private surveyor fees in addition to state administrative charges.

ESTIMATED 2026

Service Type	Albania (ALL / EUR)	Serbia (RSD / EUR)	Croatia (EUR)	Kosovo (EUR)
Ownership Certificate	3,000 ALL (~€30)	~1,200 RSD (€10)	€1.99 – €3.00	€10.00 – €15.00
Copy of Cadastral Map	1,500 ALL (~€15)	~ €10 - €21	~€7.00- €10.00	€10.00
Property Status	1000 ALL (~€10)	~600 RSD (€5)	~€7.00	€5.00
Registration of Title Transfer	5,000 ALL €50	~5,500 RSD (€47)	~€34.00	€30.00+ (variabel)
Registration of Lease	5,000 ALL (~€50)	~3,500 RSD (€30)	~€20.00	€15.00
Property Division	5,000 ALL (~€50)	~€25-€75	~€15-€30	~€100-€150

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ANNEX B – Status of IC Recommendations on Property Legal Security

PILLAR 1. PROPERTY REGISTRATION AND DIGITALIZATION

The completion of initial property registration and the improvement of cadastral data quality remain essential prerequisites for legal certainty of ownership and the functioning of the property market. The SCA has reported that the scanning of property documentation has been completed and that the digitalization of property cards is approximately 80% complete, with full completion expected by June 2026. Around 10 cadastral services are now available online through e-Albania, and 10–15% of applications are processed automatically. The SCA “FAST” service enables processing of applications within 24 hours of payment confirmation.

The completion of initial registration is legally mandated by 2028; however, the SCA’s current

implementation trajectory targets completion by 2027, with the objective of covering at least 95% of cadastral zones. The Digitalization Roadmap for 2025–2028 has been adopted, setting clear strategic approaches and timelines. Nevertheless, challenges related to title overlaps, documentation inaccuracies, and limited administrative capacity for processing dossiers persist and require systematic resolution.

At present, no structured mechanism enables the financial sector to directly access cadastral data for collateral verification purposes, a key IC recommendation that remains unimplemented. The draft law on Electronic Identification and Trust Services has been reopened for public consultation; however, the establishment of streamlined procedures for lending-related applications is still pending.

PILLAR 2. TRANSPARENCY AND ACCESS TO STATE PROPERTY INFORMATION

Transparency regarding the status of state property is essential for investor confidence and efficient use of public assets. The SCA has begun registering state properties belonging to central institutions through a phased approach, identifying 30 priority properties per phase and completing two phases with approximately 800 properties registered. A third phase is currently underway. Cadastral information is publicly accessible free of charge through the ASIG Geoportál.

However, significant gaps persist. No consolidated, publicly accessible inventory of state properties exists. The fund of properties for strategic investments (FPPIS) is not pre-established but populated reactively on a case-by-case basis. The “property passport” concept has been piloted for a limited number of properties in cooperation with international experts, but these passports have not been officially published or systematized. The transparency of lease contracts and concessions related to state properties also remains limited, with responsibility for systematic submission resting across multiple institutions that have not yet created dedicated tracking structures.

PILLAR 3. INSTITUTIONAL COORDINATION AND REFORM MONITORING

Effective property reform requires sustained coordination between central institutions, specialized agencies, and local government. While an institutional structure exists for reform governance (comprising the Inter-Min-

isterial Committee, technical working groups, and relevant agencies), this structure consists primarily of state representatives and does not formally include private sector or civil society actors, as recommended by the IC.

At the municipal level, progress on property inventory and registration remains notably limited. Despite the SCA’s introduction of reduced tariffs (a symbolic fee of 100 ALL for property registration and 10% of standard service value), these financial incentives have not translated into visible advancement at the national level. No evidence has been identified of dedicated working groups within municipalities, structured reporting to Municipal Councils, or allocated budget lines for this process. The SCA has adopted an Integrity Plan and an Action Plan for integrity risk management and has introduced unified operational procedures across all regional and local directorates through a series of internal orders and guidelines during 2024–2025. A Training Unit was established, and a Communication Strategy has been adopted in cooperation with the Council of Europe. However, a unified and standardized methodology for evaluating staff performance in relation to institutional targets and service quality has not yet been developed.

PILLAR 4. ECONOMIC UTILIZATION OF PROPERTY FOR INVESTMENT

The identification and promotion of state properties available for investment remains a critical gap. While institutions continue the process of identifying and prioritizing state properties for registration, the process remains fragmented. AIDA utilizes existing in-

struments on a limited, case-by-case basis when specific investor interest arises; however, this approach has not been institutionalized into a structured mechanism for promoting state properties for investment.

No pre-identified, consolidated fund of state properties for strategic investment currently exists, or, where such a fund exists, it is not made transparent. Responsible institutions

have not yet established dedicated structures to systematically track the inventory, prioritization, and registration of state properties in the context of investment needs. The determination of reference prices for agricultural land purchases and related fiscal policy development falls outside the competence of the SCA and remains the responsibility of other institutions.

ANNEX C – FIAA WHITE BOOK 2025-2029

SPECIFIC ISSUE 1:

Articles 6 and 8 of the Law provide that damages suffered by individuals arising from cadastral activities shall be compensated through the establishment of a reserve fund. The Law does not provide any further specifications regarding the nature of the damage or its compensation, in contrast to the repealed Law No. 33/2012 “On the Registration of Immovable Property,” as amended, which contained more detailed provisions concerning the compensation of damages caused by the activities of the immovable property registration office.

Although individuals who suffer damage from cadastral activities may rely on the principle of legal certainty guaranteed under Article 5/b of Law No. 111/2018, referring to the general provisions of the Civil Code and to the special law No. 8510, dated 15.07.1999, “On Non-Contractual Liability of State Administration Bodies,” as amended, we consider that a more con-

crete provision should be included in Law No. 111/2018 regarding damages caused by cadastral activities and the procedures for their compensation.

RECOMMENDATION:

It is recommended that Law No. 111/2018 be amended to include a more specific and detailed provision governing the determination of damages suffered by individuals as a result of cadastral activities, as well as the procedures for their compensation.

SPECIFIC ISSUE 2:

According to Article 29 of Law No. 111/2018, requests for cadastral services must be processed within 15 days, and in any case, no later than 21 calendar days. Article 64 further provides that delays in response constitute an administrative

violation, for which the responsible employee may be subject to a fine. However, while Law No. 111/2018 establishes sanctions for delays, it does not provide an effective mechanism to ensure that services are actually delivered within the maximum 21-day period, nor does it specify how the requesting party may, in practice, expedite the service in the event of such delays.

RECOMMENDATION:

It is recommended that the Law provide for the establishment of a Monitoring Committee to oversee service requests and ensure compliance with the response deadlines, as well as the creation of an interactive platform within the SCA administration to manage all complaints from applicants, since, in practice, such mechanisms are currently not available.

SPECIFIC ISSUE 3:

Article 56 of Law No. 111/2018 regulates the registration of mortgage rights over immovable property, providing that such a mortgage shall be registered as a lien against the property, regardless of the owner. This provision is consistent with the nature of the mortgage as an in rem security right, attached to the immovable property irrespective of changes in ownership. This leaves open the possibility to transfer the ownership of the immovable property, together with the mortgage right exiting. However, this principle is contradicted by the provision of paragraph 4, of Article 56, Law No. 111/2018, which provides that, “during the term of the

mortgage, no contract for the transfer of ownership to third parties shall be registered.” This provision unreasonably restricts the right of the owner to transfer the immovable property with a mortgage registered over it, hence, impeding the possibility for such immovable property to enter the civil circulation in the economy. Furthermore, this provision is in contradiction with the legal nature of the mortgage provided in the Civil Code as a security right registered over immovable property that follows the asset regardless of changes in ownership. As such, it does not restrict the owner’s right to transfer the ownership of the immovable property.

RECOMMENDATION:

It is recommended removing the provision of paragraph 4 of Article 56 of Law No. 111/2018, in order to ensure that the registration of a mortgage does not interfere with the transfer of ownership of the immovable property, in line with the principles set out in the Civil Code.

ADDITIONAL RECOMMENDATIONS:

1. Amendments to the law No.111 / 2018 “On the Cadastre”

These amendments aim to expand opportunities for collateral coverage. Specifically, Article 50 of the Law should be reviewed to provide for the possibility for banks to create and register, in a special mortgage register (construction permit register), real rights over immovable property under construction, the ownership of which will be acquired in the future. Other amendments should also be introduced to: (i)

foresee the mandatory registration of the entrepreneurship contract, otherwise, it has no legal validity, as well as the obligation of notaries to notarize and register this contract; and (ii) enable the registration of future mortgage contracts at the construction stage (following registration of the construction permit), as in practice such registration is currently not possible with the reasoning that “the asset does not yet exist.”

2. Access of banks as “selected users” to the electronic real estate register.

It is recommended that banks be granted access as “selected users” to the electronic real estate register, considering their role as creditors holding real rights over immovable property. Such access would facilitate the mortgage

process and enable continuous verification of the legal status of collateral throughout the life cycle of a loan.

3. Amendments to the Decision of the Council of Ministers no. 782, dated 07.10.2020, “On the Approval of Models of Cadastral Acts and Data in the Content of the Cadastral Map.”

Specific amendments should be introduced to ensure compliance with the Civil Code and applicable legislation. These changes should ensure that documents issued by the Cadastre must provide legal certainty for all stakeholders and parties involved. In addition, the Cadastre should adopt internal guidelines to ensure the uniform and accurate implementation of this Decision across all regional offices.

ANNEX D – Summary of Issues on Property as reported by AmCham in Albania

The identified issues have been structured according to the following pillars:

(a) Progress of initial registration - Despite certain improvements, issues related to data quality and the insecurity of property titles continue to pose obstacles to investment.

(b) Digitalization – quality of digital services versus cost - The digitalization of services in the field of real estate, including those provided by SCA, notaries, and banks, has significantly improved access by reducing bureaucracy and physical contact, while increasing the speed and transparency of procedures. However, the cost of these services often does not correspond to the actual quality delivered, particularly due to technical issues and the lack of system updates.

(c) The process of registering state-owned properties – issues at the local level, taxation, and use by investors - The lack of a complete inventory of

state-owned properties, both at the local and central levels, delays in their transfer and registration, overlapping boundaries, and insufficient inter-institutional coordination create uncertainty regarding ownership and the administration of these assets.

(d) The “Mountains Package.” - The process of designating priority areas often progresses slowly and is not implemented uniformly across all municipalities.

(e) Integrity, quality of service, prevention of corrupt practices, and interaction with SCA - Practices such as preferential treatment, intentional delays, or unjustified requests undermine public trust and legal certainty. Furthermore, the absence of standardization and inter-institutional coordination results in inconsistent treatment of applications, varying documentation requirements, and delays in contract registration.

ANNEX E – National Reform Agenda Progress and SCA Roadmap Timelines on Digitalization

NRA PROGRESS

MEASURES AND RESULTS	DEADLINE
STEP 1 Initial registration has been completed in 95% of all cadastral zones.	JUNE 2026
STEP 2 Digitization of all manual real estate property records has been completed and digitization continues, in accordance with the comprehensive Roadmap, to achieve tangible results with the completion of digitization processes approved by June 2026.	JUNE 2026
STEP 3 Adoption of a comprehensive Roadmap to achieve tangible results for completing digitization processes, ensuring that previous ownership titles physically administered in offices, as well as real estate and cadastral maps in all cadastral zones, are digitized, prioritizing economically significant areas, and that initial registration is fully completed. <ul style="list-style-type: none"> Assessment of infrastructure and technology needs, and allocation of necessary human and financial resources. Drafting of a comprehensive roadmap for digitization of all cadastral services and paper-based maps (June 2025). Drafting of a financing plan for the roadmap. 	JUNE 2025

STEP 4

Adoption of a land policy and the necessary administrative, budgetary, and coordination measures to begin implementation in 2028.

- Review of the legal basis of the Council of Ministers' order on the Interministerial Committee for Land Policy.
- Preparation of a draft outline on land policy.
- Drafting of the Land Policy document and consultation with stakeholders and third parties.
- Approval of the Land Policy document.
- Preparation of monitoring methodology for the land policy.
- Package of implementation design agreements.

**JUNE
2027**

STEP 5

Adoption of an integrity plan including effective anti-corruption measures reflecting stakeholders' views (civil society representatives, National Chamber of Attorneys, National Chamber of Notaries, banking association, business associations, etc.), aiming to improve transparency and accountability in service delivery and demonstrate significant improvements in quality, transparency, efficiency, and accountability in services such as registration of ownership titles, real rights, obligations, and issuance of certificates provided by the State Cadastre Agency.

- Establishment of the Inter-institutional Working Group.
- Drafting of the Risk Assessment Document.
- Drafting of the Action Plan based on the Risk Assessment Document.
- Approval of the Integrity Plan (December 2025);
- Establishment of an ad hoc monitoring body to assess implementation of the Plan.

**DECEMBER
2025**

**DECEMBER
2027**

SCA Roadmap on Digitalization Process

REFERENCES

- » National Strategy for Development and European Integration 2022–2030
- » European Reform Program 2025-2027
- » EU Progress Report 2025
- » US Department of State Investment Climate Statement 2025
- » FIAA White Book 2025-2029
- » National Reform Agenda 2024-2027
- » Law No. 111/2018 “On the Cadastre”
- » Law No.20/2020 “On the Finalization of Transitory Processes on Property”
- » Law No. 20/2025
- » Law No.10273 Dated 29.04.2010 “On Electronic Document” (As Amended)
- » Law 43/2023 “On Electronic Governance”
- » CoM decision no. 132 dated 07.03.2018
- » CoM Decision no. 782, dated 7.10.2020 “On the approval of models of cadastral acts and the data contained in the cadastral map”
- » Instruction no.2 dated 15.10.2025
- » <https://www.ashk.gov.al/wp-content/uploads/2025/07/Udherrefyesi-i-Digitalizimit-te-Agjencise-Shteterore-te-Kadastres.pdf>
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Dr. Diana Leka (Angoni)
Drejtoare e Sekretariatit
lekad@investment.com.al

Elvis Zerva
Ekspert Ligjor dhe Rregullator
zervae@investment.com.al

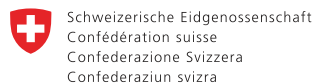
Elida Fara
Eksperte Ekonomie
farae@investment.com.al

Xaira Shurdha
Eksperte për Monitorimin dhe Bashkëpunimin
shurdhax@investment.com.al

Elisa Lula
Oficere Administrative dhe Komunikimi
lulae@investment.com.al

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