

MATRIX OF RECOMMENDATIONS

PROPERTY RIGHTS SECURITY PROGRESS AND CHALLENGES

April 2026

This matrix of recommendations aims to summarize the recommendations and solutions proposed in the Technical Note and serves as an Internal Plan for monitoring from AIC secretariat team to follow up their implementation. The recommendations implementation requires actions and the proactive role of both governmental institutions and the business community.

Clarifying and effectively enforcing property rights is essential to promoting economic development, investment, access to finance, and social stability, although in Albania this process remains complex due to the legacy of historical issues that have generated legal uncertainty and ownership disputes.

The recommendations below are the result of analyses and consultations carried out by the Investment Council Secretariat with a considerable number of stakeholders and experts from both the private and public sectors, and they focus on four main pillars: a) service delivery quality and standardization, aimed at eliminating inconsistencies in service provision, ensuring equal access, and reducing procedural uncertainty for all users; b) the level of transparency and the strengthening of user trust, through the accelerated registration of state property and the creation of a regularly published and publicly accessible inventory, with the aim of reinforcing investor confidence; c) institutional accountability; and d) coordination, data integrity, and legal certainty.

Intervention / Recommendation	Responsible institutions/ Institutions included in implementation	Term
<p>Recommendation 1: Standardised Procedures and Documentation¹- 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.</p>	<p>State Cadastre Agency National Agency for Information Society</p>	<p>Medium-term</p>

¹ *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.*

<p>Recommendation 2: Assessment of the feasibility of broader Digital Cadastre Access²- 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.</p>	<p>Ministry of Justice State Cadastre Agency National Agency for Information Society Commissioner for the Right to Information and Protection of Personal Data</p>	<p>Medium-term</p>
<p>Recommendation 3: Transparency of Service Fees³- Enhance transparency in the fee structure by publishing a clear methodology or set of guiding principles that explain how cadastral fees are determined.</p>	<p>State Cadastre Agency Ministry of Finance</p>	<p>Short-term</p>
<p>Recommendation 4: Improve Official Communication Channels⁴- 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.</p>	<p>State Cadastre Agency National Agency for Information Society</p>	<p>Medium-term</p>
<p>Recommendation 5: Implement the Integrity Plan and Accountability Measures⁵- 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).</p>	<p>State Cadastre Agency Department of Public Administration (DoPA)</p>	<p>Medium-term</p>

² 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.

³ 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.

⁴ 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.

⁵ 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.

<p>Recommendation 6: Introduce Private Sector Participation in Reform Monitoring⁶ -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.</p>	<p>Interministerial Property Committee State Cadastre Agency</p>	<p>Medium-term</p>
<p>Recommendation 7: Strengthen Complaint and Grievance Mechanisms⁷ - 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.</p>	<p>State Cadastre Agency National Agency for Information Society Agency for Dialogue and Co-Governance</p>	<p>Medium-term</p>
<p>Recommendation 8: Active Coordination in Registration of Public and State Properties⁸-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, and engage with stakeholders from business associations (e.g., agrotourism), to prioritise the registration process on development needs and geographic location.</p>	<p>State Cadastre Agency Ministry responsible for Local Government Agency for the Support of Local Self-Government Ministry of Finance Municipalities</p>	<p>Medium-term</p>

⁶ 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).

⁷ The SCA complaints mechanism is perceived as ineffective by businesses, who express dissatisfaction with the responses provided. FLAA proposed a Monitoring Committee and an interactive platform to oversee requests and ensure compliance with deadlines.

⁸ 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 agrotourism industry.

<p>Recommendation 9: Strengthening Legal Certainty of Cadastral Data⁹- 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.</p>	<p>State Cadastre Agency</p>	<p>Medium-term</p>
<p>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.</p>	<p>Ministry of Agriculture and Rural Development</p> <p>Ministry of Finance</p> <p>State Cadastre Agency</p> <p>General Directorate of Taxes</p>	<p>Long-Term</p>

<p>Suggestions from Members</p>	<p>Referent subject of the suggestion</p>
<p>It is suggested to address the issue of inconsistencies in property registration across different stages of development, particularly for properties under construction, shell structures, sold through pre-sale/order contracts, by establishing a synchronized mechanism between existing registers and the final ownership registration, with the aim of facilitating the process at the stage of final formalization.</p>	<p>Albanian Association of Banks</p>
<p>It is suggested to establish a more sustainable case/file management system in order to avoid frequent reassignment among legal officers and repeated requests for documentation, which create additional costs for both the institution and businesses.</p>	<p>AMCHAM</p>

⁹ 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.

Development of an action plan that functions as a monitoring instrument for the IC recommendations.	NAREA
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Term:

Short-term – period from 1 to 6 months

Medium-term – period from 6 months to 1 year

Long-term – period over 1 year