Policy Brief

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Comparing Reform Agendas

Overview of Anti-Corruption Measures Among Western Balkan Countries

Introduction

Over the years of a stalled enlargement process and very slow and limited effect of reforms, the EU has become aware of inherent challenges. This led to the introduction of the Reform and Growth Facility (RFG) in 2024 – a new instrument of gradual integration aimed at revitalising the Western Balkans' (WB) reforms and membership perspective.[2] By allocating EUR 6 billion and explicitly linking access to funding to the fulfilment of reform commitments, the essential goal of the Facility was to incentivise fundamental reforms.[3] As the rule of law reforms lie at the very heart of its RGF, it becomes particularly important to analyse whether Western Balkan governments' formal commitments under the Reform Agendas translate into practice. Rather than assessing the rule of law agenda in its entirety, this paper singles out anti-corruption, as progress in this area serves as a critical proxy for overall governance and adherence to EU values. By comparatively examining this component of Reform Agendas, the analysis aims to identify emerging trends, existing gaps, and examples of promising practice.[4] The central argument is that variation in early implementation of anti-corruption reforms primarily reflects differences in political will, suggesting that the Facility's capacity to induce transformative change, while meaningful, may remain inherently constrained.

1 This paper was prepared with the valuable contributions of partners from the Think for Europe Network (TEN): Daniel Prroni (Institute for Democracy and Mediation, Albania), Haris Ćutahija (Foreign Policy Initiative, Bosnia and Herzegovina), Ema Pula (Group for Legal and Political Studies, Kosovo), Dragana Jaćimović (Institute Alternative, Montenegro), and Julijana Karai (European Policy Institute, North Macedonia) as part of the Regional Consultative Workshop *Fighting Corruption in the Western Balkans as part of the EU's Enlargement Reprioritisation*.

2 Official Journal of the European Union, Regulation (EU) 2024/1449 of the European Parliament and of the Council of 14 May 2024 on establishing the Reform and Growth Facility for the Western Balkans, 2024/1449

3 Reform and Growth Facility is referred to as "the Facility" or "RGF" throughout the paper.

4 Bosnia and Herzegovina is the only WB country that has not to date adopted the Reform Agenda in 2024. The document was adopted in October 2025, but it is still awaiting EC verification during writing of this paper. Thus, five other countries are analysed: Serbia, Montenegro, Albania, North Macedonia, and Kosovo* (This designation is without prejudice to status and is in line with UNSC Resolution 1244 (1999) and ICJ advisory opinion on unilateral declaration of independence.

Why Reform and Growth Facility and Reform Agendas Matter – State of Play in the Anti-Corruption Area

The general state of play in the anti-corruption area among WB countries is not encouraging, with a mixed track record and trends between the countries. According to the latest EC's reporting, Albania and Montenegro recorded a moderate level of preparation (3 on a 1-5 scale) for the fight against corruption (see Table 1).[5] While North Macedonia and Serbia recorded between some and a moderate level of preparation (see Table 1), Bosnia and Herzegovina and Kosovo are regional laggards in this area, with only between an early stage of preparation and some level of preparation.[6] Compared to 2024, Albania and Montenegro improved their preparation from 2.5 to 3 (moderate level).[7] In addition, when it comes to progress, in 2025, Albania and Montenegro[8] achieved some progress, while Serbia and Kosovo recorded limited progress. North Macedonia and Bosnia and Herzegovina achieved no progress in advancing reforms (see Table 2).[9] Key common issues for the region as a whole concern the limited impact of the institutional framework for prevention, weak coordination with law enforcement, weak track record of investigation, prosecution, indictments and convictions in cases of high-level corruption, and effective verification of asset declarations. Thus, corruption persists as a structural challenge on the Western Balkans' EU accession path, indicating that traditional incentive mechanisms alone are insufficient to generate meaningful progress. Therefore, RGF and Reform Agendas have a role in bridging the gap between the existing state of play and the successful fight against corruption.

Table 1. Level of preparation in the area of anti-corruption according to the European Commission Annual Country Reports 2024 and 2025, sources: European Commission 2024 Enlargement Package & European Commission 2025 Enlargement Package

Country	Level of preparation 2024	Preparedness on a 1-5 scale	Level of preparation 2025	Preparedness on a 1-5 scale
Albania	between some level of preparation and a moderate level of preparation	2.5	Moderately prepared	3.0
Bosnia and Herzegovina	between an early stage of preparation and some level of preparation	1.5	between an early stage of preparation and some level of preparation	1.5
Kosovo	between an early stage of preparation and some level of preparation	1.5	between an early stage of preparation and some level of preparation	1.5
Montenegro	between some level of preparation and a moderate level of preparation	2.5	Moderately prepared	3.0
North Macedonia	between some level of preparation and a moderate level of preparation	2.5	between some level of preparation and a moderate level of preparation	2.5
Serbia	between some level of preparation and a moderate level of preparation	2.5	between some level of preparation and a moderate level of preparation	2.5

5 European Commission, 2025 Enlargement Package shows progress towards EU membership for key enlargement partners, 4. November 2025.

6 Quantification methodology source: https://cep.org.rs/en/publications/preparation-and-progress-of-serbia-towards-eu-membership-2024/ and https://cep.org.rs/en/publications/enlargement-package-2025-quantification-serbia/

7 European Commission, Commission adopts 2024 Enlargement Package, November 2024.

8 Compared to 2024 there is a notable slowdown in the case of Montenegro from "good progress" to "some progress" in 2025 which serves a warning from the EC to Podgorica not to relax when it comes to fighting against corruption.

9 European Commission, 2025 Enlargement Package shows progress towards EU membership for key enlargement partners, November 2025.

Table 2. Level of progress in the area of anti-corruption according to the European Commission Annual Country Reports 2024 and 2025, sources: European Commission 2024 Enlargement Package & European Commission 2025 Enlargement Package

Country	Level of progress 2024	Level of progress 2025
Albania	Some progress	
Bosnia and Herzegovina	Limited progress	No progress
Kosovo	Limited progress	
Montenegro	Good progress	Some progress
North Macedonia	No progress	
Serbia	Some progress	Limited progress

Comparing Reform Agendas: What Anti-Corruption Measures Say About Countries

The Reform Agenda was conceived as a structured document depicting clear commitments of the national government for reforms operationalised as reform steps (often referred to as reform measures), with baseline benchmarks, implementation indicators and sources of verification. The idea was to enable better tracking of reforms by EC and all interested parties, and financially reward countries only after they had successfully fulfilled commitments from their respective Reform Agenda. Therefore, given the fact that anti-corruption efforts have not met high expectations so far, as argued and described in the previous section, the EC used RGF and Reform Agendas to stimulate WB countries to make additional commitments in this segment. This resulted in multiple anti-corruption measures being adopted in the Reform Agendas of all analysed states and entities.

In total, WB countries and entities adopted 25 anti-corruption reform steps as part of the Reform Agendas. Albania leads with 10 steps, followed by Kosovo with 5, North Macedonia with 4, while Montenegro and Serbia opted for 3 anti-corruption steps in their Reform Agendas. However, numbers cannot speak for themselves, as reform steps vary among countries, thus requiring qualitative analysis. As previously noted, the reform steps differ across countries. In some cases, they are more general, while some countries have defined very concrete reforms. Furthermore, measures differ in type, as some include legislative changes and adoption of strategic documents, while others envisage establishing new anti-corruption institutions, while others set effective law enforcement and improved track record of high-level corruption cases. Corruption and organised crime are, in some cases, merged, while in others, seen as two distinct reforms/reform areas. The fight against organised crime is not the focus of this research, therefore, in cases where it distinct sub-area of reforms, it is not taken into account. Against this backdrop, the following section unpacks the steps taken in each country and evaluates their potential for transformative change.

Albania dedicated three reforms with nine reform steps in the area of the fight against corruption and organised crime. It is important to note here that Albania is the only country that merged the fight against corruption and organised crime as part of the same reform, unlike the other four WB countries and entities. As shown in Table 3, Albania committed to establishing an Asset Recovery Office (ARO) and to strengthening repression of corruption and organised crime, including in high-level cases. All three reforms are widely regarded as ambitious, given that the establishment of new institutions with broad competencies and strengthened repressive capacities could represent a significant turning point for Albanian society and the state. Nevertheless, such expectations warrant caution, as Albania continues to face substantial and persistent deficiencies in the rule of law.[10] Whether these reforms will indeed show as a game-changer will depend on the political will and ripeness of institutions to implement them.

10 According to Daniel Prroni (Institute for Democracy and Mediation), Regional Consultative Workshop, Belgrade, October 2025.

Table 3. Overview of reforms and reform steps of Albania's RA in the area of the fight against corruption, source:

Reform	Reform steps
Establish an Asset Recovery Office, as a National Coordination Unit and regional/ international contact point, contributing to improvement of seizures and confiscation	Step 1 - An Asset Recovery Office is established and operational
	Step 2 - Submit an application to join the European Network of Asset Recovery Offices or in regional/international recovery platforms
	Step 3 - At least 50% of the number and value of confiscated assets are re-used (include social re-use) within 6 months from the confiscation (December 2026).
Strengthen repression of corruption and organised crime, including in high-level cases	Step 1 - Produce the threat assessment of organised and serious crimes and review the National Strategy and its Action Plan, on Organised and Serious Crimes
	Step 2 - Expand access and interoperability of databases and use of IT tools /investigative methods in fight against organised crime investigation (December 2026)
	Step 3 - Continuous progress with the quality of proceedings in full compliance with due process rights, and improving the track record of effective and efficient investigations, prosecutions, final judgements, seizure, and final confiscations in corruption, including high-level corruption cases (by June 2026) repeated in (by June 2027).
	Step 4 - Continuous progress with results in the field of investigations, prosecutions, convictions, seizure and confiscations of assets in organised crime related cases (June 2027).
Effectively prevent corruption, decrease incidence of corruption	Step 1 - Degree of transparency on asset declaration (December 2024)
	Step 2 - Adopt amendments in legal framework on Supreme Audit Institution (SAI) to increase (December 2026)
	Step 3 - The legal framework on donations and sponsorships, and on conflict of interest, and on political party financing (June 2027)

Unlike Albania, the *Kosovo* government opted for keeping the existing institutional framework, but improving its efficiency through prevention. As shown in Table 4, one reform contains five steps varying from adopting an anti-corruption strategy, increasing the number of whistleblowing reports, increasing the number of cases sent by the Agency for the Prevention of Corruption to the prosecution, more efficient work of special court departments dealing with corruption, and increasing the overall number of investigations, indictments and convictions, including high-level ones. Although Kosovo's reform is more general, its reform steps are concrete (see Table 4), and if implemented properly, they have the potential to yield significant results. Nonetheless, there is a genuine concern about whether the Kosovo government could deliver on this reform due to the overall political impasse in Pristina and the relatively low level of commitment in this area so far.[11] Having in mind the ongoing political stalemate, as Kosovo has had an acting government since March 2025, and the general context of international isolation and disrupted relations with Belgrade, combined with the ongoing snap elections scheduled for the end of 2025, the chances for achieving good progress in the anti-corruption area weaken by the day.

11 According to Ema Pula (Group for Legal and Political Studies), Regional Consultative Workshop, Belgrade, October 2025.

Table 4. Overview of reforms and reform steps of Kosovo's RA in the area of the fight against corruption, source:

Reform	Reform steps
Improve the efficiency to fight corruption through prevention and repression and by improving the strategic framework	Adopt an Anti-Corruption Strategy for 2024-2027, in line with European best practices and standards and national constitutional principles and including annual action plans with measurable objectives and a reporting mechanism on its implementation. (December 2024)
	Increase the number of whistleblowing reports processed by the Agency (by 30% compared to 2024). (June 2025)
	Increased number of cases notified to prosecution office by the Agency for Prevention of Corruption (by 30% compared to 2023 baseline) in 2025; 15% of anti-corruption legislation assessed and 50% of integrity plans reviewed. (June 2026)
	Disposition time by Courts' Special Departments in corruption, organised crime, and terrorism first instance cases in 2026 reduced to 1 year. (June 2027)
	An increase in the number of investigations, confirmed indictments and convictions is demonstrated in cases of corruption, including at high level. (December 2027)

Montenegro's Reform Agenda follows a trajectory comparable to that of Kosovo, placing strong emphasis on the effective implementation of existing legislation and a phased reform approach designed to generate measurable results (see Table 5). The government leverages the Agenda to simultaneously advance alignment with the EU acquis and respond to GRECO and OSCE recommendations, while also strengthening the fight against high-level corruption and improving asset recovery mechanisms. Key measures include integrity testing within Customs and Tax Administration, the systematic filling of vacancies in anti-corruption institutions, and the establishment of clearer operational conditions for oversight bodies. The third reform step sets particularly high expectations, aiming to deliver tangible progress in investigations, prosecutions, court rulings, and confiscations related to corruption offences, including those at the highest political level. Concerns have been raised regarding the quality of the indicators and baseline values, with particular attention drawn to significant weaknesses in the measures contained in the recently adopted Strategy for the Prevention of Corruption.[12] In the context of Montenegro's ongoing accession process, having begun closing negotiation chapters and targeting completion by the end of 2026, credible implementation of these measures could significantly accelerate progress on Chapter 23, which remains among the most demanding in the EU accession framework.

Table 5. Overview of reforms and reform steps of Montenegro's RA in the area of the fight against corruption, source:

Reform	Reform steps
Effective enforcement of legislation to combat corruption, including high-level corruption,	Step 1 - Anti-corruption strategy/action plan implementation: Integrity tests are created and delivered in the Customs Administration and the Tax Administration – target is reaching at least 30% of staff
including financial investigations and seizure and confiscation of assets, in line with the EU acquis,	Step 2 - increase by 20% of filling in vacant positions - in accordance with the Rulebook on the internal organisation and systematisation of positions - in competent courts for the fight against corruption
European and international standards, including the recommendations of the 2022 review mission, as well as recommendations of GRECO and OSCE	Step 3 - Improved results in the field of investigations, prosecutions, final judgments, confiscation and final confiscation in corruption, including cases of high-level corruption. Demonstrate an overall increase in the number of investigations, confirmed indictments and convictions, including high-level corruption cases; demonstrate an increase in the number and the overall value of seizures, freezing and confiscations of the proceeds of crime; demonstrate an increase of standalone financial investigations (June 2026) repeated in (December 2027)

North Macedonia focused on enhancing the resources and capacities of competent anti-corruption bodies on the one hand, while on the other, it aimed to increase the number of investigations, prosecutions, judgments, and confiscations in corruption cases, including those involving high-level officials. It dedicated three reforms with accompanying five reform steps. The anti-corruption measures adopted within North Macedonia's RA resemble RAs of Kosovo and Albania and represent a mix of measures of these two countries. In theory, these reforms and reform steps should yield results in North Macedonia, yet practice often tells a different story. An expert from North Macedonia warns of a lack of political will, sluggishness in this area and a general stagnating

12 According to Dragana Jaćimović (Institute Alternativa), Regional Consultative Workshop, Belgrade, October 2025.

trend in the country when it comes to EU-related reforms.[13] Taking into consideration that this country once again entered a negative trend when it comes to corruption perception[14] and that progress in opening clusters depends on constitutional reform (as a result of the Bulgarian veto), one should be cautious about what trajectory North Macedonia will take when it comes to fighting against corruption.

Table 6. Overview of reforms and reform steps of North Macedonia's RA in the area of the fight against corruption, source:

Reform	Reform steps
Additional resources allocated to the Office of the Basic Public Prosecutor for Organised Crime and Corruption, notably specialised prosecutors, financial experts, and digital forensic analysts	Step: Basic Public Prosecution Office for Organised Crime and Corruption fully and adequately staffed with, notably specialised prosecutors, financial experts, and digital forensic analysts (December 2025)
Increase the number of investigations, prosecutions, final judgements, seizure, and final confiscations in corruption, including high-level cases.	Step: Adoption of the Criminal Code in line with the EU acquis and European standards, including the definition of abuse of functions, with sufficiently long statutes of limitations and effective, proportionate and dissuasive sanctioning (December 2025).
	Step: Adoption of a new Code for Criminal Procedure, aligned with EU acquis and international practice (December 2025).
	Step: An increase in the number of investigations, confirmed indictments and convictions is demonstrated in cases of corruption, including at high level; an increase in stand-alone financial investigations is demonstrated; an increase in the overall value of seizures, freezing and confiscations of the proceeds of crime is demonstrated (June 2026 and repeated June 2027).
Increase the capacities of the investigative centres within the Public Prosecution Office, in line with the recommendations of the peer review mission from Sep 2023.	Step: The investigative centres fully operational as per recommendations from the TAIEX Twinning Review Mission on Building institutional capacity of the Investigative Centre (by June 2026).

Serbia, similarly to Montenegro, adopted one anti-corruption reform in its RA with three concrete reform steps in this area. In its reform, Serbia set out a general goal of improving the fight and prevention of corruption (see Table 7). It further elaborates in three more concrete reform steps that cover strategic documents adoption, filling vacant positions in competent bodies, and judicial track record in tackling corruption, including the high-level corruption cases. The government appropriately pinpointed weak spots in the anti-corruption area, but important deficiencies persist. First, the absence of consultations with civil society limited the breadth and ambition of the reforms and reform steps ultimately included in the Reform Agenda. Second, the opportunity was missed to strengthen the role of the Agency for Prevention of Corruption despite the long-standing criticism that the Agency remains overly passive and constrained by a very limited competencies. After the adoption of RA, Serbia was hit by the Novi Sad Railway Station tragedy, where 16 people lost their lives. Following the tragic incident, student and civic protests erupted across the country, putting the corruption in the centre of the stage and demanding accountability of those responsible.[15] In such a delicate political moment, the Serbian government can, by implementing the Reform Agenda, use its potential and the momentum and deliver substantial results in fighting corruption. However, given the lack of cooperation with the civil sector and general slowness in fulfilling EU-related reforms, Serbian RA risk becoming just one of many pledged commitments overlooked by the Serbian government.

13 According to Julijana Karai (Institute Alternativa), Regional Consultative Workshop, Belgrade, October 2025.

14 See more at: Transparency International, Corruption Perception Index, North Macedonia.

15 See more at: Strahinja Subotić, Serbia's Civic Awakening: the 2024-2025 Student Protests in Focus, Foundation for European Progressive Studies (FEPS), June 2025.

Table 7. Overview of reforms and reform steps of Serbia's RA in the area of the fight against corruption, source:

Reform	Reform steps
Improved fight against and prevention of corruption	Step 1 - Following consultations with the Commission, the strategy and action plan for 2025-2028 are adopted (December 2024)
	Step 2 - All vacant positions for prosecutors and judges in anti-corruption departments and in special prosecutor's office for organised crime, and special department of the higher court and of the appellate court in Belgrade for organised crime are filled in accordance with the Annual Schedule of Judges (adopted by the HJC) and the Decision of the High Prosecution Council on the number of public prosecutors and trained. (December 2025)
	Step 3 - The track record of effective and efficient investigations, prosecutions, final judgements, seizure, and final confiscations in corruption, including high-level corruption cases is improved (June 2026) repeated in (June 2027).

Taken as a whole, the anti-corruption reforms embedded in the Reform Agendas across the Western Balkans demonstrate a shared acknowledgement that corruption remains a central obstacle to EU integration, yet they vary significantly in ambition, depth, and potential impact. While all five countries and entities commit to strengthening legislative and institutional frameworks and improving track records in investigations, prosecutions, and asset confiscation, the substance of these commitments differs markedly. Albania and Montenegro stand out for introducing more structurally transformative measures, such as the establishment of an Asset Recovery Office and integrity testing within key public administrations, which, if implemented credibly, could alter long-standing patterns of impunity. In contrast, other countries rely primarily on incremental improvements to existing mechanisms whose effectiveness has already been questioned in practice. A notable common denominator across all Reform Agendas is the explicit focus on high-level corruption, a politically sensitive but potentially transformative area that, if addressed seriously, could signal a genuine break with entrenched practices. However, as the preceding analysis shows, formal alignment with EU standards and well-designed reform steps will not, on their own, deliver results. Ultimately, the success of these agendas will depend on sustained political will, institutional independence, and the readiness of governments to allow anti-corruption bodies to operate without interference – without which the Reform Agendas risk becoming yet another exercise in procedural compliance rather than a driver of meaningful change across the Western Balkans.

Analysis of implementation and reporting indicators

Assessing the implementation of Reform Agendas in the Western Balkans represents a challenging task at this point. There are several reasons behind this. Firstly, the whole implementation process was slow-paced throughout the region. Secondly, some data are not publicly available in all countries. Thirdly, even EC's official scoreboard is not updated and many of the reform steps are not yet due. With all of this in mind, this section will provide only a preliminary assessment of the implementation of Reform Agendas in WB, with a caveat that the precision of this assessment can vary to a degree and that changes can happen easily at any given moment.

Starting with *Albania*, it has made certain progress when it comes to anti-corruption steps as part of its Reform Agenda. Namely, ARO was established in 2025 after the Albanian Parliament adopted the Law on the Asset Recovery Office.[16] Although this is just a first step, as it still needs to be operationalised and functional, it confirms that Albania has reached an important milestone. When it comes to Albania's second reform – strengthening repression on corruption – the first results could be seen here as well. In February 2025, Tirana Mayor Erion Veliaj was arrested on charges of corruption.[17] However, one should take this with a reserve, since the court proceedings are far from the end. Although these are indicators that Albania is moving in the right direction, there is still plenty of work to be done. The ARO needs to become fully functional and deliver concrete results, while the track record of final judgments and confiscations is yet to be established.

Kosovo recorded very limited progress in implementing its reform steps in the anti-corruption area. Only one was due in 2024 – the adoption of the new Anti-Corruption Strategy 2024-2027, which is often seen as an easier part of the reform process, but even this has not been met yet. The government started preparing the draft strategy and accompanying action plan, but the adoption was delayed due to the caretaker government and legal limits as a severe limiting factor.[18] With a deep political crisis and an inability to make a first step in the reform process, Kosovo remains stuck with an unclear perspective for RA implementation and moving

16 LAW No. 44/2025 ON THE ASSET RECOVERY OFFICE, available at: https://asp.gov.al/wp-content/uploads/2025/08/Law-no.44-Asset-Recovery-Office-26.6.2025-English.pdf

17 See more at: Organized Crime and Corruption Reporting Project (OCCPR), Tirana Mayor Arrested in €1M Corruption, Fraud Scandal, 11 February 2025.

18 The ongoing political stalemate and political crisis have paralysed Kosovo institutions due to the inability to constitute parliament and elect a government since the parliamentary elections held in February 2025.

forward on the European path.

Montenegro made good progress in the previous 12 months when it comes to the anti-corruption segment of its Reform Agenda implementation. According to the EC Scoreboard, Montenegro has achieved the best progress in implementing RA steps compared to other WB countries, putting it in a favourable position for approval of funding and closing chapter 23 in accession negotiations.[19] It adopted the Strategy for the Fight Against Corruption 2024-2028 and accompanying Action Plan and set up reporting/operational teams to monitor implementation.[20] Moreover, there is an improving track record in opening investigations and prosecutions of higher-level corruption compared with prior years (more cases reach the investigation stage).[21] Progress has been made on tackling high-level figures, as recently the former minister of defence was arrested.[22] Finally, while investigations increased, final conviction rates for high-level corruption remain low and do not create an effective deterrent. Montenegro still has time to make progress when it comes to convictions by the end of 2027. If it manages to do so, not only will it unlock a significant amount of funds from the RGF, but it will be able to close the most difficult chapter of the negotiations process.

The state of RA implementation in *North Macedonia* diverges markedly from Montenegro, where the situation appears considerably more concerning. The monitoring of the Basic Public Prosecution Office for Organised Crime and Corruption indicates it remains understaffed, while the 2024 EC Country Report and 2025 Rule of Law chapter both call for more human and financial resources, notably financial experts.[23] Furthermore, the adoption of the Criminal Code is underway, but not finalised yet, the same as is the adoption of a new Code for Criminal Procedure (both planned for 2025). Moreover, when it comes to an increase in the number of investigations, confirmed indictments and convictions in corruption (including high-level), monitoring shows an uneven track record: some high-profile investigations opened (e.g., Dec 2024 investigations into former senior officials),[24] but overall convictions, particularly for high-level corruption and value of confiscations, have been limited. Finally, money-laundering cases and complex asset recovery are rare and often result in light sentences. Having all that in mind, and adding the difficult political context North Macedonia is in, passing a final judgement becomes challenging. At this point, the progress in implementing reform steps is rather limited, but there is still enough time for the Macedonian government to catch up with Montenegro and Albania.

Serbia received a mixed assessment when it comes to implementing RA reform steps. First, it adopted the National Strategy for Fighting Against Corruption 2024-2028 with accompanying Action Plan, but these documents were fiercely criticised by the civil society organisation and experts in the field for lack of transparency and consultation during the adoption process.[25] Second, the Special Department for Organised Crime (Higher Court Belgrade) and the Prosecution for Organised Crime are operational, but vacancies and workload imbalances persist.[26] Third, an improved track record in corruption investigations, indictments, and judgments, including high-level cases, showed some developments. In February 2025, a wave of corruption arrests was launched, with more than 650 people arrested, including two ministers in the previous government.[27] However, this move was assessed as politically motivated, and the independence of prosecution was questioned.[28] Overall, while Serbia has formally advanced several anti-corruption reforms, the combination of weak institutional independence, politicised enforcement, and limited transparency continues to undermine the credibility and sustainability of its reform efforts.

19 European Commission, Reform and Growth Facility Scoreboard.

20 See more at: https://eusluge.euprava.me/eParticipacija/GetFile.aspx?Id=2304

21 European Commission, 2025 Rule of Law Report, Country Chapter on the Rule of Law Situation in Montenegro, Commission Staff Working Document, SWD(2025) 929 final, p. 1.

22 See more at: N1, U Crnoj Gori uhapšen ministar odbrane, 6. October 2025.

23 European Commission, 2025 Rule of Law Report, Country Chapter on the Rule of Law Situation in North Macedonia, Commission Staff Working Document, SWD(2025) 930 final and European Commission, North Macedonia 2025 Report, Commission Staff Working Document, SWD(2025) 753 final

24 See more at: Transparency International Macedonia, "Light and Dark" Corruption Barometar 2024, January 2025.

25 Danas, EWB o Nacionalnoj strategiji za borbu protiv korupcije: Nije jasno kakvi će koraci biti preduzeti da se reše „hronični" problem, 5. August 2024.

26 European Commission, 2025 Rule of Law Report, Country Chapter on the Rule of Law Situation in Serbia, Commission Staff Working Document, SWD(2025) 931 final.

27 As part of an investigation on Novi Sad Railway Station, former minister Goran Vesic and Tomislav Momirovic were arrested on charges issued by the Prosecutor for Organised Crime. See more at: Insajder, MUP: U akciji borbe protiv korupcije od početka godine uhapšeno 657 osoba, pričinjena šteta 5,7 milijardi dinara, 30. June 2025.

28 Miloš Pavković, Lex Specialis as Modus Operandi: Analysing Public Procurement Systems in the Western Balkans, European Policy Centre (CEP), 2025.

Conclusion

In summary, the comparative analysis of anti-corruption measures across Western Balkan countries and entities reveals a stark contrast between formal commitments and tangible results. While countries like Albania and Montenegro have demonstrated early signs of progress through institution-building, strategic initiatives, and increased investigations, others, such as Kosovo and North Macedonia, remain hampered by political instability, under-resourced institutions, and slow legislative implementation. Serbia's reforms, despite notable arrests and adoption of strategic frameworks, also illustrate the persistent risks of politicisation and weak institutional independence. These findings suggest that the success of the Reform and Growth Facility in strengthening anti-corruption efforts will ultimately hinge not only on the adoption of legislative and institutional measures but on the consistent, transparent, and impartial implementation of reforms. Without genuine political will, robust oversight, and credible enforcement mechanisms, the ambitious reform steps outlined in each country's Reform Agenda risk remaining largely symbolic, leaving the Western Balkans' broader EU integration prospects vulnerable to stagnation.

Recommendations

Recommendations for the Western Balkan governments:

1. **Shift from formal compliance to implementation and measurable results.**
   Reform Agendas must not remain legislative check-lists; governments should prioritise enforcement, track records of high-level corruption cases, asset confiscation, and execution of judgments.

2. **Ensure institutional independence and adequate resourcing.**
   Strengthen the financial, human, and operational capacities of anti-corruption bodies, prosecution offices, and investigative centres, with transparent merit-based appointments and safeguards against political interference.

3. **Strengthen asset recovery frameworks across the region.**
   Albania should ensure the operationalisation, staffing and performance of the newly established ARO with clear KPIs on seizure, management and social reuse of assets. Other Western Balkan governments should consider establishing dedicated **Asset Recovery Offices or functionally equivalent units within existing institutions**, with legal authority to trace, freeze, confiscate and manage illicit assets. Regional interoperability and participation in EU networks (e.g., the European Asset Recovery Offices Platform) should be prioritised to enable cross-border cooperation and faster recovery of proceeds of crime.

4. **Strengthen inter-agency coordination and information exchange.**
   Introduce mandatory cooperation protocols between police, prosecution, tax authorities, financial intelligence units and anti-corruption agencies, enabling joint investigations and faster case progression.

5. **Introduce transparent monitoring and public reporting mechanisms.**
   Publish biannual progress reports on Reform Agenda implementation with disaggregated data on investigations, indictments, trials, convictions, and asset confiscations, including high-profile cases.

6. **Institutionalise cooperation with civil society and media.**
   Use CSOs and investigative journalists as watchdog partners, formalise consultation mechanisms, and establish open data portals on corruption cases, asset declarations, public procurement and political financing.

7. **Integrate integrity systems across public administration.**
   Expand integrity testing, conflict-of-interest controls, whistleblower protection and asset declaration verification beyond central institutions, including municipalities, SOEs and security sectors.

8. **Use momentum generated by high-profile corruption cases and public scrutiny to advance systemic reforms.**
   Public exposure of grand corruption should be treated as an opportunity for systemic reform rather than selective justice or politically-motivated enforcement.

Recommendations for the EU:

1. **Improve the timeliness and transparency of the RGF Scoreboard.**
   Ensure regular and up-to-date publication of implementation data, moving away from infrequent and delayed updates. The Scoreboard should reflect real-time or near-real-time progress, and provide disaggregated indicators on anti-corruption enforcement.

2. **Condition disbursement not only on legislative adoption but on outcomes.**
   EU funding should be linked to demonstrated track records of investigations, indictments, final judgements and confiscations - not to formal approval of strategies.

3. **Strengthen verification and audit mechanisms through independent expert monitoring.**
   Build on the existing role of EU Delegations by establishing specialised peer-review teams and external auditing expert groups to independently verify implementation outcomes, track prosecution and asset recovery results, and reduce risks of politically-influenced reporting. Such mechanisms should rely on on-site verification, direct access to case-based data, and consultations with civil society and investigative actors.

4. **Include civil society, investigative media, academia and local experts in evaluations.**
   Assessment missions and RA progress reviews should integrate non-governmental evidence, shadow reports and whistleblower information.

5. **Reward credible progress with more flexible and accelerated financial support.**
   Countries demonstrating sustained improvement—particularly in high-level corruption enforcement—should receive priority access to RGF disbursements.

6. **Increase support for judicial independence and anti-corruption investigations.**
   Expand grant instruments for training of prosecutors and judges, digital forensics, financial investigation tools and cross-border cooperation.

7. **Enhance the existing EU Reform Agenda dashboard with detailed anti-corruption performance indicators.**
   The Scoreboard should include case-based data (investigations, indictments, final convictions, value of confiscated assets, high-level cases), enabling clearer comparison between Western Balkan countries and strengthening accountability and public oversight.

References

Danas, *EWB o Nacionalnoj strategiji za borbu protiv korupcije: Nije jasno kakvi će koraci biti preduzeti da se reše „hronični" problem*, 5. August 2024

European Commission, *Commission adopts 2024 Enlargement Package*, November 2024

European Commission, 2025 Enlargement Package shows progress towards EU membership for key enlargement partners, November 2025

European Commission, *Reform and Growth Facility Scoreboard*

European Commission, *2025 Rule of Law Report, Country Chapter on the Rule of Law Situation in Serbia*, Commission Staff Working Document, SWD(2025) 931 final

European Commission, *2025 Rule of Law Report, Country Chapter on the Rule of Law Situation in North Macedonia*, Commission Staff Working Document, SWD(2025) 930 final

European Commission, *North Macedonia 2025 Report*, Commission Staff Working Document, SWD(2025) 753 final

European Commission, *2025 Rule of Law Report, Country Chapter on the Rule of Law Situation in Montenegro*, Commission Staff Working Document, SWD(2025) 929 final

Insajder, *MUP: U akciji borbe protiv korupcije od početka godine uhapšeno 657 osoba, pričinjena šteta 5,7 milijardi dinara*, 30. June 2025

LAW No. 44/2025 ON THE ASSET RECOVERY OFFICE, available at: https://asp.gov.al/wp-content/uploads/2025/08/Law-no.44-Asset-Recovery-Office-26.6.2025-English.pdf

N1, *U Crnoj Gori uhapšen ministar odbrane, 6. October 2025.*

Organized Crime and Corruption Reporting Project (OCCPR), *Tirana Mayor Arrested in €1M Corruption, Fraud Scandal,* 11 February 2025

Official Journal of the European Union, Regulation (EU) 2024/1449 of the European Parliament and of the Council of 14 May 2024 on establishing the Reform and Growth Facility for the Western Balkans, 2024/1449

Pavković, Miloš, *Lex Specialis as Modus Operandi: Analysing Public Procurement Systems in the Western Balkans*, European Policy Centre (CEP), 2025

Subotić, Strahinja, *Serbia's Civic Awakening: the 2024-2025 Student Protests in Focus*, Foundation for European Progressive Studies (FEPS), June 2025

Transparency International Macedonia, *"Light and Dark" Corruption Barometar 2024*, January 2025

Transparency International, *Corruption Perception Index*, North Macedonia

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