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# Media self-regulation in Albania, 2018–2025: institutions, practices, and complaint-handling pathways—a process-tracing study

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**Introduction:** This article applies theory-testing process tracing to assess how media self-regulation functions in Albania and how it interacts with statutory oversight. Building on a documentary corpus (codes of ethics; institutional rule-books; complaint decisions; regulator bulletins; EU/CoE/OSCE reports), the study reconstructs three sequences: (A) a 2025 cluster of Albanian Media Council/Alliance for Ethical Media ethics decisions concerning legacy online coverage and privacy-related claims (voluntary pillar); (B) a 2023–2024 run of Audiovisual Media Authority complaints culminating in sanctions/warnings in high-audience reality/talk formats (statutory pillar); and (C) the 2019–2024 policy trajectory of the “anti-defamation” package aimed at extending administrative oversight to a broad range of online publications and resources.

**Methods:** Across cases, we probe a hypothesized mechanism in which clear procedural rules, an empowered complaint-handling body, and timely, public, reasoned decisions are expected to increase accountability visibility—approximated through observable indicators such as accessibility of decisions, public communication of outcomes, and verifiable remedial action by outlets. Working with documentary sources, we operationalize accountability through observable proxies such as the visibility of decisions, outlet-side corrections, and complaint-routing patterns.

**Results:** Evidence suggests that the voluntary pillar issues reasoned, public decisions but faces publication-and-compliance visibility gaps, while the statutory pillar provides faster, visible redress (warnings/fines) that may crowd out voluntary mechanisms. The policy-process case shows how international standards and domestic veto points constrained the design of the proposed defamation package extension, shaping the feasible configuration of oversight.

**Conclusions:** Implications include stabilizing and standardizing transparency practices for self-regulatory outcomes (e.g., building a public registry of self-regulatory decisions and compliance logging) and clarifying coordination and referral practices between the statutory regulator and voluntary bodies in line with EU standards, including the European Media Freedom Act.

### KEYWORDS

Albania, anti-defamation, Audiovisual Media Authority, complaints, EMFA, press council, process tracing, self-regulation

## 1 Introduction

How can a media system reconcile editorial freedom with accountability outside the courts? Across Europe, the answer has often been self-regulation—profession-led ethical codes, independent ethics bodies, and non-coercive remedies such as corrections, rights of reply, reasoned public decisions. Albania offers a revealing mixed arrangement. A voluntary pillar—centred on the Albanian Media Council (Këshilli Shqiptar i Medias, AMC) ([www.kshm.al](http://www.kshm.al)) and the Alliance for Ethical Media (Aleanca për Media Etike, AEM) (<https://aleanca-etike.media>) - operates alongside a statutory pillar, the Audiovisual Media Authority (Autoriteti i Medias Audiovizive, AMA) (<https://ama.gov.al/>), which oversees broadcasting through licensing, monitoring, and administrative sanctions. Both pillars publish procedures and handle complaints, yet they differ in remedy types (moral vs. coercive), visibility (publication practices, media coverage), and their practical visibility to citizens and newsrooms.

This configuration has evolved amid sustained debates over whether to extend state oversight to a broad range of online publications and resources via an “anti-defamation” legislative package (Council of Europe Commissioner for Human Rights, 2019) and, more recently, in the shadow of the EU’s European Media Freedom Act (EMFA) (European Union, 2024), a new internal-market regulation that foregrounds regulator independence and transparency of media ownership and state support. Council of Europe analyses have begun to unpack what EMFA and the Digital Services Act may mean for countries such as Albania (Council of Europe, 2025), but the concrete implications for mixed statutory/ self-regulation arrangements remain under-specified. Meanwhile, pathways to non-judicial redress are unevenly signposted: broadcasters and reality/talk formats are highly visible in AMA reporting, while voluntary ethics rulings are public but not consistently amplified through newsroom-facing channels. The result is an empirical and policy puzzle: when and how does Albania’s self-regulatory track produce credible, visible remedies, and how does its interaction with statutory oversight shape complaint-handling pathways?

This article addresses that puzzle using theory-testing process tracing. Rather than counting complaints across bodies, the study reconstructs causal sequences within concrete cases to assess a hypothesized mechanism linking design features of complaint-handling bodies to accountability visibility and (conditionally) to the uptake of non-judicial redress: clear procedural rules + empowered bodies + timely, public, reasoned decisions → accountability visibility → greater legitimacy and uptake of non-judicial redress. We probe this mechanism across three sequences: (A) a set of AMC/AEM decisions in the voluntary pillar; (B) a run of AMA complaint outcomes culminating in warnings and a financial sanction in high-audience formats (statutory pillar), and (C) the policy process surrounding the anti-defamation package. Process-tracing tests (hoop, smoking-gun, straw-in-the-wind) are used to evaluate which links supported and where evidence remains indeterminate.

Accordingly, the study asks:

- RQ1. To what extent is Albania’s self-regulatory system institutionalized and effective in producing visible, non-coercive remedies?
- RQ2. How do interactions with the statutory pillar (AMA) enable, substitute for, or crowd out the voluntary pillar in complaint handling?

- RQ3. What reforms would strengthen the credibility and uptake of self-regulation while preserving editorial freedom and aligning with EU standards?

The article makes three contributions. *First*, it provides an up-to-date institutional map of Albania’s media accountability architecture (2018–2025), clarifying jurisdictions, procedures, and remedies across voluntary and statutory pillars. *Second*, it provides within-case evidence on how complaints travel from filing to outcome and where accountability visibility is strengthened or weakened in the documentary record (voluntary pillar). *Third*, it translates these findings into practical reforms—especially transparency and publication standardization for self-regulatory outcomes and clearer coordination and referral practices between AMA and voluntary bodies (AMC and AEM) consistent with EMFA-era expectations.

The remainder proceeds as follows. *Section 2* reviews conceptual and comparative foundations for self-regulation and co-regulation. *Section 3* details the process-tracing design, case selection, and diagnostic tests. *Section 4* summarizes contextual indicators. *Section 5* presents the three within-case analyses. *Section 6* synthesizes cross-case inferences. *Section 7* discusses implications for EMFA-aligned reform and present the conclusions of the study.

## 2 Conceptual and comparative background

### 2.1 What self-regulation and co-regulation are – and why do they matter

In journalism, self-regulation refers to profession-led accountability through codes of ethics, independent press/media councils, and non-coercive remedies. Its core purpose is to preserve editorial freedom while providing accessible redress for audiences without resorting to state sanctions or courts. Classic guidance from the OSCE underscores that there is no single model; effective systems tend to be voluntary, profession-owned, and centered on transparent procedures and published decisions (OSCE Representative on Freedom of the Media, 2008). In digital contexts, these principles continue to apply: the OSCE’s online guidebook explicitly argues that the same ethical standards and complaint mechanisms should extend across formats, with adaptations for speed and reach (OSCE Representative on Freedom of the Media, 2013). Press-council networks describe this settlement succinctly: freedom with responsibility, operationalized through ethical codes and complaint handling open to the public (MCDA) (European Federation of Journalists, n.d.).

As a baseline, effective self-regulatory arrangements are typically expected to display: (i) independence from government and dominant funders; (ii) transparent, reasoned decisions published in a timely way; (iii) meaningful newsroom participation so that remedies have practical effect; and (iv) accessibility for citizens. These criteria recur across OSCE handbooks and Council of Europe standard-setting on quality journalism and complaint mechanisms (OSCE Representative on Freedom of the Media, 2008; OSCE Representative on Freedom of the Media, 2013; Council of Europe, 2022).

Co-regulation denotes structured, arm’s-length cooperation between statutory regulators and voluntary bodies—typically via

codes of conduct, referral protocols, or data-sharing—while keeping editorial decision-making outside direct state control. In EU policy, the revised Audiovisual Media Services Directive (AVMSD) encourages Member States to foster co- and self-regulation through codes of conduct in areas such as the protection of minors and commercial communications, reflecting the view that such arrangements can complement statutory objectives (Directive (EU) 2018/1808, [European Union, 2018](#)). Council of Europe instruments likewise recognize co-/self-regulatory tools within a broader freedom-of-expression framework ([Committee of Ministers of the Council of Europe, 2011](#)). However, it is important to mention that in this article, AMC/AEM are treated as voluntary self-regulatory arrangements. While Albania exhibits a mixed accountability ecology (voluntary self-regulation alongside statutory enforcement), this should not be conflated with ‘co-regulation’ in the narrower EU/CoE sense that typically entails formalized shared governance or structured joint frameworks between state and non-state actors.

## 2.2 Contrasting Albania’s statutory pillar (AMA) with the voluntary pillar

Albania’s Audiovisual Media Authority (AMA) is a statutory regulator with a mandate over linear and non-linear audiovisual services under Law No. 97/2013. Within this remit, AMA issues warnings and financial sanctions and applies a detailed Broadcasting Code (most recently updated by Decision No. 60, 10 July 2023). By design, this pillar relies on administrative enforcement and legally binding remedies rather than the moral persuasion typical of self-regulatory arrangements ([Council of Europe, 2020](#)).

By contrast, Albania’s voluntary media accountability architecture – centered on the Albanian Media Council and the Alliance for Ethical Media – operates through voluntary adherence to the Journalists’ Code of Ethics, mediation, and public decisions aimed at correction and ethical accountability rather than punishment. Remedies are non-coercive and reputational in nature and depend on publication practices, newsroom cooperation, and public visibility for their practical effect, reflecting core principles articulated in OSCE guidance and European press-council practice ([OSCE Representative on Freedom of the Media, 2008](#)).

In this study, self-regulation (non-coercive, profession-led remedies) and statutory regulation (law-based, coercive enforcement) are treated as distinct but potentially complementary accountability paths, each operating under different legal mandates, incentives, and visibility conditions. The analysis does not assume that one path is normatively superior or empirically dominant. Instead, it examines how each pillar generates observable accountability signals, how those signals differ in form and salience, and how their coexistence shapes complaint-handling practices in a mixed system (Directive (EU) 2018/1808, [European Union, 2018](#)).

Scholarship on media self-regulation and accountability has long debated when press and media councils move beyond symbolic or purely moral instruments to become effective sites of redress. Classic work emphasizes that councils, ombudsmen, and ethic bodies rely primarily on soft power—reputation, peer pressure, and transparency—rather than coercion ([Bertrand, 2000](#); [McQuail, 2003](#)). Cross-national studies of European accountability bodies identify persistent design tensions: arrangements that are too closely aligned with professional interests’ risk capture and ineffectiveness, whereas those tied to state institutions or dominant market actors risk undermining

editorial independence ([Eberwein et al., 2011](#); [Fengler et al., 2014](#)). Research on media and regulatory governance further situates self- and statutory regulation within broader hybrid systems, in which authority is distributed across regulators, industry actors, and civil society ([Bardoel and d’Haenens, 2004](#); [Puppis, 2010](#)). In post-communist and hybrid regimes, these arrangements operate in politicised environments marked by contested regulator independence, market concentration, and EU conditionality ([Dragomir, 2019](#); [Hallin and Mancini, 2004](#); [Jakubowicz, 2007](#)). Albania’s dual-pillar configuration fits this broader European pattern of hybrid accountability, while also reflecting the specific pressures of democratic consolidation and accession-driven reform.

Domestic scholarship has increasingly examined Albania’s media regulation within the context of EU integration. Legal-policy analyses trace how innovative regulatory tools and practices align (or fail to align) with EU standards in the digital age, including proposals around co-regulation and platform oversight ([Budini et al., 2025b](#)), while related work on media discourse shows how Albanian newsrooms narrate the path “from isolation to integration” in their coverage of EU accession ([Budini et al., 2025a](#)). Earlier scholarship already highlighted self-regulation in the electronic media as a key test of Albania’s readiness to internalize European norms, but mainly at the level of formal frameworks and policy prospects ([Budini, 2015](#)). Complementary contributions from journalism and media-law studies focus on how technology-driven data journalism can support transparency and accuracy in line with EU expectations ([Ferhataj, 2025](#)), and how media-freedom and source-protection standards derived from international and European law should be embedded in domestic practice ([Lamçe and Zhilla, 2025](#)). Building on this body of work, the present article shifts the lens from normative design and discourse to within-case process tracing of complaint handling and policy conflict, asking not only what the Albanian framework aspires to under EU standards, but how accountability mechanisms actually function across voluntary and statutory bodies.

Our theorised mechanism builds on how these literatures understand legitimacy and accountability in non-judicial redress. Political science work stresses that institutions gain acceptance not only from their formal mandates but also from perceptions of fair procedures and effective problem-solving ([Scharpf, 1999](#); [Suchman, 1995](#)). Media-specific studies similarly argue that accountability mechanisms are credible when they are procedurally transparent, open to audiences, and capable of generating visible corrective action in newsrooms ([Eberwein et al., 2011](#); [McQuail, 2003](#)). At the same time, research on co-regulation and regulatory competition suggests that strong statutory enforcement can “crowd out” voluntary mechanisms when citizens and media actors come to view the state regulator as the only effective route to remedy ([Bardoel and d’Haenens, 2004](#); [Puppis, 2010](#)). Our rival “state-centric substitution” and “litigation/SLAPP deterrence” mechanisms speak directly to this concern.

Within this scholarship, the article’s contribution is threefold. Empirically, it reconstructs in detail how complaints travel through Albania’s mixed accountability system—both in the voluntary and statutory pillar—and how the anti-defamation package would have redrawn the boundary between them. Existing comparative work on media accountability in Central and Eastern Europe and the Western Balkans often maps institutions and legal frameworks but rarely follows specific complaint sequences across fora or over time. Conceptually, the article refines the notion of “accountability” in mixed systems by showing how it depends not only on the existence

of codes and councils, but also on the visibility of outlet-side compliance and on the relative publicity and coerciveness of statutory sanctions. Methodologically, it demonstrates how theory-testing process tracing can be applied to media regulatory design: by using hoop, smoking-gun, and straw-in-the-wind tests on documentary evidence, we assess not just whether institutions formally exist, but whether the hypothesized mechanism linking design features to accountability visibility and complaint routing is borne out in concrete Albanian cases.

### 3 Methodology: applying theory-testing process tracing

#### 3.1 Research question, scope conditions, and causal mechanism

The research question guiding the study is: To what extent does Albania’s self-regulatory system produce credible and visible non-judicial remedies, and how do interactions with statutory oversight help or hinder that process?

The analysis covers 2018–2025, from the revision of the Journalists’ Code of Ethics (Council of Europe, 2018) through the anti-defamation debate and the entry into force of the European Media Freedom Act (with full application from August 2025). The domain is media-ethics accountability in press/online journalism and audiovisual broadcasting, excluding criminal speech and court litigation. Evidence is drawn exclusively from publicly accessible documentary sources: laws and ethical codes, institutional procedures and rulebooks, published decisions, official bulletins and press notes, and assessments by European and international organizations.

Building on the process-tracing canon (Beach and Pedersen, 2019; Bennett and Checkel, 2014; Collier, 2011; George and Bennett, 2005; Mahoney, 2012), we formulate the following mechanistic hypothesis:

When media-accountability bodies have clearly specified rules and authority and issue timely, public, and reasoned decisions, they are more likely to generate high levels of accountability visibility, which in turn supports the legitimacy and uptake of non-judicial redress.

We conceptualize this mechanism as shown in Table 1: clear procedural rules + empowered bodies + timely, public, reasoned decisions → accountability visibility → legitimacy and uptake of non-judicial redress.

The mechanism is expected to operate under the following scope conditions:

- (a) the existence of profession-led media self-regulation;
- (b) minimal awareness among media actors and audiences of available accountability bodies; and.
- (c) the presence of statutory regulation that is significant but not fully dominant across all media sectors, leaving room for a voluntary accountability track to operate alongside statutory enforcement.

In addition to the main hypothesized mechanism outlined above, the analysis is evaluated against two rival mechanisms that have been identified in the literature on media governance and regulatory interaction.

TABLE 1 Hypothesized mechanism linking design features of complaint-handling bodies to accountability visibility and the uptake of non-judicial redress.

Design features of body	Accountability visibility (observable indicators)	Legitimacy and uptake of non-judicial redress
<ul style="list-style-type: none"> <li>• Clear procedural rules (jurisdiction, timelines, conflict-of-interest rules)</li> <li>• Empowered bodies (mandate, composition)</li> <li>• Timely, public, reasoned decisions</li> </ul>	<ul style="list-style-type: none"> <li>• Public accessibility of decisions and remedies</li> <li>• Outlet-side corrections/apologies or link-backs when appropriate</li> <li>• Public communication of outcomes (press notes, bulletins, registries)</li> </ul>	<ul style="list-style-type: none"> <li>• Complaints are routed to voluntary or statutory bodies rather than courts</li> <li>• Outlets engage with and implement remedies</li> <li>• Accountability bodies are treated as credible alternatives to purely judicial or coercive enforcement</li> </ul>

*The first* is a state-centric substitution mechanism. This mechanism does not assume displacement as a given, but posits that where statutory enforcement produces more salient, regularly publicized, and coercive outcomes than voluntary remedies, complainants may come to view the statutory regulator as the most effective route to redress within its jurisdiction. Over time, this may condition complaint-routing behavior, particularly in high-visibility media sectors such as broadcast entertainment. Importantly, this mechanism is treated as contingent, not automatic: it is expected only where statutory remedies are both more visible and clearly applicable,

*The second* is a litigation and legal-risk sensitivity mechanism, often discussed in relation to SLAPPs. This mechanism is treated bidirectionally. Heightened legal risk may reduce outlets’ willingness to publicly acknowledge ethical breaches or engage visibly with voluntary rulings; at the same time, contemporary EU digital regulation (including the Digital Services Act) recognizes participation in self-regulatory or co-regulatory schemes as a form of due diligence and risk mitigation. Legal risk may therefore either discourage or incentivise engagement with voluntary accountability mechanisms, depending on context, sector, and dispute type (Table 2).

In the empirical analysis that follows, the state-centric substitution mechanism is treated as the primary rival and subjected to process-tracing tests alongside the main hypothesis. The litigation/legal-risk sensitivity mechanism is treated as a background conditioning factor, informed by aggregate indicators and external assessments, but not reconstructed as a full within-case causal sequence due to limitations in the available documentary evidence.

#### 3.2 Case selection and justification

The study employs purposeful within-case selection to maximize inferential leverage on the hypothesized mechanism and its rivals, following established guidance in theory-testing process tracing (George and Bennett, 2005; Blatter and Haverland, 2014; Beach and Pedersen, 2019). Rather than seeking representativeness, cases are selected because they illuminate distinct stages of complaint handling, variation in remedy visibility, and different institutional configurations within Albania’s mixed media accountability system.

TABLE 2 Rival mechanisms.

State-centric substitution	Litigation/legal-risk sensitivity
Statutory enforcement is more visible and coercive, conditioning complaint routing toward the statutory regulator within its remit.	Legal risk may either discourage visible engagement with voluntary remedies or incentivise participation as a form of due diligence.

Three cases are analysed, each serving a specific analytic function.

### 3.2.1 Case A: voluntary accountability in practice (AMC/AEM decisions, 2025)

Case A consists of a cluster of Albanian Media Council/Alliance for Ethical Media decisions adopted in June 2025 concerning legacy online coverage and privacy-related claims. Although the decisions involve the same complainant and similar factual circumstances, they were addressed to multiple outlets and processed through the full voluntary complaints' procedure. The case is therefore treated as a single, privacy-centered test of the voluntary pillar, rather than as three substantively independent disputes.

The analytic purpose of Case A is not to assess the general publicity effects of self-regulatory remedies across all dispute types, but to examine whether the voluntary system satisfies the front-end conditions of the hypothesized mechanism: clearly specified rules, jurisdiction, decision-making capacity, and public availability of reasoned decisions. Because the complaints concern the "right to be forgotten," expectations regarding remedy visibility are normatively constrained: prominent republication of decisions or corrections may be inappropriate, as it risks re-amplifying the contested content. Accordingly, Case A is used to test whether accountability signals are produced in documentary form (public decisions, stated remedies, procedural transparency), while leaving the final step of outlet-side publicity indeterminate by design. This circumscribed use avoids over-generalizing from a privacy-specific dispute type to the voluntary pillar as a whole.

### 3.2.2 Case B: statutory enforcement and high-visibility remedies (AMA complaints, 2023–2024)

Case B examines a sequence of complaint and monitoring outcomes handled by the Audiovisual Media Authority between 2023 and 2024, including warnings and a financial sanction in high-audience entertainment formats. This case is deliberately selected as a visibility-maximizing statutory scenario, in which legal authority, public reporting, and coercive remedies converge. It provides a strong test of the hypothesized mechanism under conditions where accountability visibility is expected to be high and allows assessment of the rival state-centric substitution mechanism within the statutory regulator's clearly defined jurisdiction.

### 3.2.3 Case C: policy-process constraints on accountability design (anti-defamation package, 2019–2024)

Case C traces the policy trajectory of the anti-defamation legislative package, from parliamentary adoption through

presidential veto, Venice Commission review, and eventual withdrawal signals. This case is selected as a critical institutional design episode, not because it defends a fixed boundary between statutory and self-regulation, but because it illustrates how domestic veto points and international standards constrain feasible configurations of media oversight. The case provides process-tracing leverage on how scope, independence, proportionality, and due-process concerns shape accountability arrangements in EU-accession contexts.

Taken together, the three cases allow for structured comparison without overreach. Case A tests whether the voluntary pillar reliably produces formal accountability signals under privacy-constrained conditions; Case B tests whether statutory enforcement generates highly visible remedies; and Case C clarifies the institutional design constraints under which both pillars operate. This configuration enables evaluation of the main mechanism and its rivals without assuming displacement, crowding-out, or body shopping ex ante, and without extending conclusions beyond what the selected cases can plausibly sustain.

## 3.3 Data and collection strategy

The empirical corpus is documentary and archival/online, consisting exclusively of publicly accessible sources:

- Normative instruments: the Code of Ethics for Journalists (2018) and the Ethical Guidelines for Online Journalism (Albanian Media Institute, 2018a, 2018b).
- Voluntary accountability bodies: statutes, rules of procedure, FAQs, and posted decisions of the Albanian Media Council and the Alliance for Ethical Media (2018–2025) [Albanian Media Council (Këshilli Shqiptar i Medias – AMC), 2018; Albanian Media Council (AMC), 2025a, 2025b, 2025c; Alliance for Ethical Media, n.d.].
- Statutory regulations: Law No. 97/2013 on Audiovisual Media; the AMA Broadcasting Code; AMA bulletins, press notes, and named decisions [Law No. 97/2013; Audiovisual Media Authority (AMA), 2025a, 2025b, 2023c, 2024a AMA Decision No. 83/2023].
- Contextual and external assessments: the EU Albania Report 2024; Venice Commission opinions (2020), Council of Europe: Venice Commission (2020), the Reporters Without Borders (RSF) (2025); European Commission (2024);
- Policy -process reporting: contemporaneous coverage by Reuters, Voice of America, Euroactiv etc. relating to the anti-defamation legislative trajectory [Reuters, 2019; Voice of America (VOA), 2019; Euractiv, 2024].

## 3.4 Operationalization and coding

We convert the mechanism's abstract steps into observable indicators of accountability visibility:

- *Clear procedural rules*: presence of posted statutes/FAQs outlining jurisdiction, timelines (e.g., 7-day media response; monthly board meetings), conflict-of-interest handling. (AMC rules; AMA law/code).
- *Empowered bodies*: for the voluntary pillar, a constituted ethics board with a published remit; for the statutory pillar, a legal mandate under Law No. 97/2013 and the Broadcasting Code.

- *Timely, public, reasoned decisions*: existence of dated decisions, reasoning (e.g., citing Article 17 of the Code), and public availability (download link, press note).
- *Accountability visibility*: observable signals including (i) public communication of outcomes by the accountability body (press notes, decision registry); (ii) verifiable outlet-side responses such as corrections/apologies or link-backs where normatively appropriate; (iii) institutional visibility cues that may condition complaint routing.
- Conditions for legitimacy and uptake: inferred from consistency, transparency, and accessibility of accountability signals over time, rather than directly measured behavioral uptake.

Coding proceeded in two stages: (1) event reconstruction (chronological sequencing of decisions and actions), (2) mechanism coding (presence or absence of indicators at each step). Uncertainty was recorded explicitly particularly where outlet-side responses were not observable in the documentary record.

For Case A's outlet-side compliance, we used a standardized search strategy to reduce non-observation risk. For each outlet (Panorama Online, Elbasani Plus, Tirana Sot), we started from the URL cited in the AMC decision and checked whether the original item had been removed, amended, or accompanied by a correction, apology, or editorial note. We then used the outlet's internal search and site-restricted web searches (e.g., "R. T.," headline keywords, "korrigjim/përgënjeshttrim" + site:domain.tld) and, where available, scanned dedicated clarification/corrections sections and AMC social-media posts or news items announcing decisions. The search window ran from the decision date (24 June 2025) to three months afterwards. For each outlet, we coded compliance as "yes" (visible correction/apology or link-back on the outlet's site), "no" (explicit non-publication noted by AMC), or "uncertain" (no observable action in the materials consulted). This procedure cannot eliminate all risk of non-observation, but it makes explicit the tools, time frame, and criteria behind the visibility assessment.

### 3.5 Diagnostic tests and inferential logic

Following the process-tracing canon, we deploy diagnostic tests (Beach and Pedersen, 2019; Mahoney, 2012; Collier, 2011):

- Hoop test (necessary): e.g., *existence of a public, dated decision*—failure strongly undermines Mechanism.
- Smoking-gun test (sufficient where normatively appropriate): e.g., *an outlet publishes a correction/apology linking to the AMC decision*—decisively supports the "public remedy → accountability visibility" link.
- Straw-in-the-wind (suggestive): e.g., *posted timelines, meeting schedules*—increase confidence but are neither necessary nor sufficient.
- Doubly decisive test (rare): e.g., *official legislative withdrawal document* in the policy-process case.

Among rival explanations, the analysis focuses on state-centric substitution as the primary alternative mechanism and subjects it to the same inferential logic as the main hypothesis, examining relative visibility and salience of statutory versus voluntary accountability signals. Litigation and legal-risk sensitivity is treated as a contextual conditioning mechanism, informed by aggregate indicators and

institutional assessments, but not reconstructed as a full within-case causal sequence due to evidentiary limits.

### 3.6 Validity, reliability, and limitations

To safeguard internal validity, we base the analysis on dated, primary documents issued by institutions—laws, codes, formal decisions—so that event timing is clear and the risk of recall or reporting bias is minimized. The study's central analytical focus, "accountability visibility," is operationalized through observable indicators rather than claims about public perception. For reliability and transparency, we keep an auditable record of all files and event logs, and when webpages are mutable or frequently updated, we rely on official PDFs or archived snapshots to preserve a stable evidentiary record. The approach has limitations. Non-observation does not equal non-compliance: the absence of a visible correction may reflect site design, relocation, or deletion rather than inaction. Some decisions are summarized rather than fully reasoned, which introduces selective-transparency risk. Finally, the study does not directly measure audience perceptions or complaint-routing behavior, and any inferences regarding legitimacy or uptake remain conditional and inferential rather than demonstrative.

## 4 Context and indicators

Albania's statutory oversight of broadcast media exhibits a relatively high volume of audience-initiated redress. In 2023, the Council of Complaints of the Audiovisual Media Authority (AMA) reviewed 390 complaints—the highest annual total recorded at the time—and in 2024 a further 349. In both years, citizens formed the clear majority of complainants, with smaller shares from civil society organisations, law firms, institutions, media outlets, and commercial entities. While limited to a two-year observation window, this consistently high citizen share is compatible with the statutory body's visibility and accessibility as a channel for non-judicial redress within its legal remit [Audiovisual Media Authority (AMA), 2024a, b; Audiovisual Media Authority (AMA), 2025a].

Alongside complaint intake, AMA's Monitoring and Analysis Directorate conducted systematic content verification. For 2024, the authority reports 241 instances of potentially non-compliant audiovisual content, primarily concerning the protection of children from harmful material, compliance with licence and programming obligations, hate speech and discrimination, and advertising rules. Of these cases, 77 were classified as violations. AMA reports the imposition of 52 warnings and 15 financial sanctions in response. The documentation does not specify the remedial outcome for the remaining violations, suggesting that not all confirmed breaches necessarily resulted in formal sanctions or that additional measures are reported elsewhere. Within its mandate over linear and on-demand audiovisual services, AMA thus combines reactive complaint-based and proactive monitoring-based enforcement, with a visible sanctioning component (Audiovisual Media Authority (AMA), 2025a, b). Summary indicators are presented in Table 3.

The broader press freedom environment presents a mixed picture. Reporters Without Borders ranks Albania 80th out of 180 countries in its 2025 World Press Freedom Index, an improvement from 99th in 2024, reflecting gains in journalist safety but continued weaknesses on

political and economic indicators. RSF highlights persistent structural pressures, including conflicts of interest between business and politics, opacity in media financing, and risks of partisan influence over regulatory institutions [Reporters Without Borders (RSF), 2025].

From a European integration perspective, the [European Commission's, 2024](#) Albania Report concludes that no progress was made during the reporting period on freedom of expression and alignment of the media framework, including with forthcoming EMFA obligations. The report documents a rise in strategic lawsuits against public participation (SLAPPs) to 73 cases in 2023 (up from 42 in 2022) and identifies structural challenges affecting the media environment: weak implementation of access-to-information rules; concerns regarding the independence of AMA linked to appointment procedures and political affiliation; and the absence of effective safeguards against abusive litigation. Together, these findings situate Albania in a context where statutory enforcement capacity is active, but broader rule-of-law and market-structure conditions continue to shape incentives for both voluntary and statutory accountability mechanisms ([European Commission, 2024](#)).

The European Media Freedom Act (EMFA) constitutes a near-term regulatory horizon for adjustments to this mixed accountability system. EMFA entered into force on 7 May 2024 and will apply fully from 8 August 2025, introducing obligations aimed at strengthening editorial independence, transparency of media ownership and state advertising, and the functional independence of national media regulators. Official guidance also highlights the staged applicability of several provisions and the emerging role of the European Board for Media Services in coordinating practice among independent national regulators. While the Board's mandate is focused on statutory regulators, its activities are indirectly relevant for the broader accountability environment in which voluntary self-regulatory bodies operate ([European Union, 2024](#); [European Board for Media Services, 2025](#)).

## 5 Results: within-case process tracing

### 5.1 Case A – voluntary complaints at AMC/ Alliance (2025, R. T. Vs. three outlets)

This case examines how far Albania's voluntary self-regulatory track progresses along the hypothesized causal sequence, from formal rules and adjudication to observable accountability outcomes. The complaints were filed by R. T., who argued that several outlets had retained or republished legacy online stories from 2020 concerning a family dispute involving alleged falsification of civil-status records in

the context of a housing and property conflict. The complainant had discussed the matter publicly when he was 18 years old. The three Albanian Media Council (AMC) decisions—concerning Panorama Online, Elbasani Plus, and Tirana Sot—identify the specific articles at issue and conclude that the content no longer carried sufficient public-interest value, that the complainant had been young and in a vulnerable position at the time of the interviews, and that the outlet which originally published the story had since removed it. On this basis, the Board recommended that the outlets respect the complainant's right to be forgotten by withdrawing, correcting, or otherwise remedying the publications. The hypothesized sequence for this case is: published rules and jurisdiction → receipt and screening of complaint → reasoned decision → public availability of the decision and recommended remedy → accountability visibility.

Each link is evaluated using process-tracing diagnostics (hoop tests, straw-in-the-wind indicators, and—where normatively appropriate—potential smoking-gun indicators), triangulating across posted decisions and institutional rules.

*Preconditions (rules and jurisdiction):* The Alliance for Ethical Media's internal rules codify jurisdiction, conflict-of-interest declarations, and meeting periodicity, and assign the Albanian Media Council the role of complaints secretariat. They specify operational deadlines: the media outlet must respond within seven working days to the Board's information request; the Board meets at least monthly; decisions are generally adopted within one month (extendable to three months); and decisions must be communicated to the parties within seven days. Importantly for accountability visibility, Article 13 requires outlets found in breach to publish the Board's decision in the same space as the contested item. If publication does not occur within seven days, the Board is required to inform Alliance members and periodically inform the public about non-compliant outlets. These provisions satisfy hoop tests for the institutional preconditions of the mechanism and define what publication of a remedy would entail in practice ([Alliance for Ethical Media, n.d.](#)).

#### 5.1.1 Receipt and screening of complaint

On 24 June 2025, AMC posted three decisions in the R. T. matter—one for each outlet. Each post identifies the complainant and outlet, records the breached provision as Article 17, and lists the outcome as Vendimi: Miratohet (complaint upheld). Article 17 of the Albanian Journalists' Code of Ethics governs public-interest assessment and the balancing of competing rights. The existence of three same-day, similarly reasoned rulings constitutes a hoop test for adjudication and provides straw-in-the-wind evidence of a consistent interpretive anchor across parallel complaints [[Albanian Media Council \(AMC\), 2025a, 2025b, 2025c](#); [Albanian Media Institute, 2018a, b](#)].

#### 5.1.2 Decision publication and type of remedy

The three case pages are publicly accessible and include a downloadable decision file (“Shkarkoje”), indicating that the Board's reasoning is made publicly available in documentary form. Consistent with the self-regulatory model, the remedies are non-coercive—publication of the decision, correction, and/or apology—rather than financial sanctions. This stage of the mechanism passes a hoop test for transparency and provides suggestive support for the link between reasoned decisions and accountability visibility. The explicit requirement that outlets publish the decision in the same space as the original

TABLE 3 AMA complaint and enforcement indicators, 2023–2024<sup>1</sup>.

Year	Complaints reviewed	Share of complaints from citizens	Warnings	Fines
2023	390	89%	48	6
2024	349	72%	52	15

Data compiled from AMA complaints bulletins and press notes. “Verified content cases” refer to instances where the monitoring and analysis directorate conducted a substantive assessment of potentially non-compliant audiovisual content; “confirmed violations” are those where a breach was established and led to a warning or fine.

item further strengthens the normative basis for visible remedies (Alliance for Ethical Media, n.d.; Albanian Media Council (AMC), 2025c).

### 5.1.3 Compliance visibility (the final link)

Within the publicly accessible materials consulted for this study, no clearly visible outlet-side corrections, apologies, or link-backs to the AMC decisions were identified on the three outlets' websites during the observation window. Non-observation does not constitute evidence of non-compliance: items may have been removed, relocated, or amended without prominent signaling. Moreover, in right-to-be-forgotten disputes, expectations of prominent publication are normatively constrained, as increased visibility may re-amplify contested content. For these reasons, this case cannot deliver a decisive smoking-gun test for outlet-side compliance. What can be stated is that, in the public record reviewed, the final step of accountability visibility remains indeterminate.

### 5.1.4 Interim inference

Case A confirms the front half of the hypothesized mechanism: procedural rules and jurisdiction are clearly specified; complaints were received and adjudicated; and reasoned decisions were made publicly available. What remains unresolved is whether the final step—outlet-side publication of the remedy in the same location as the violation—was completed in a manner observable to audiences. In process-tracing terms, multiple hoop tests are passed and suggestive evidence of transparency is present, but no decisive evidence is available for the last link. This limitation is substantively important, as the credibility of voluntary self-regulation depends not only on the existence of decisions, but on whether remedial action is observable in practice, within the normative constraints of privacy-sensitive cases (Table 4).

## 5.2 Case B – statutory complaint handling at AMA (2023–2024, high-audience programmes)

Case B examines the statutory enforcement pathway through which the Audiovisual Media Authority (AMA) translates legal mandate and oversight capacity into reasoned decisions that culminate in warnings or financial sanctions. The statutory mechanism under observation is: legal mandate → complaint intake and/or monitoring

→ reasoned decision → public warning or sanction → accountability visibility.

*Legal basis and scope.* AMA's jurisdiction is grounded in Law No. 97/2013 on Audiovisual Media (as amended), which covers linear and non-linear audiovisual services and explicitly excludes the written press and most online-only publications. The authority operationalizes this mandate through the Audiovisual Media Broadcasting Code, approved by AMA Decision No. 60 of July 10, 2023. Both the statute and the code delineate standards on the protection of minors, hate speech and discrimination, and advertising practices, among others. The AMA's own complaints bulletin reiterates that even after the April 2023 amendments, online press remains outside the authority's remit. These sources satisfy a hoop test for jurisdiction and scope, establishing that AMA has authority over the programs analyzed in this case while delimiting what lies beyond it [Republic of Albania, 2013; Audiovisual Media Authority (AMA), 2023a, b, 2024b].

### 5.2.1 Complaint intake and monitoring

Throughput indicators show that AMA is an active body for audience redress. In 2024, the Council of Complaints reported 349 complaints reviewed, 72 percent of which were filed by citizens; in 2023, the council handled 390 complaints. In parallel, AMA's monitoring and analysis directorate verified 241 content cases in 2024, of which 77 were found to involve violations, resulting in 52 warnings and 15 fines. These data pass a hoop test for institutional capacity and demonstrate the availability of both complaint-based and monitoring-based enforcement tools. Importantly, the cases analysed below concern sanctions that followed complaint-based proceedings, allowing clearer reconstruction of the decision-making sequence from intake to outcome [Audiovisual Media Authority (AMA), 2025a, 2025b, 2024b].

### 5.2.2 Reasoned decisions with observable sanctions

Named programme decisions illustrate how AMA links factual findings to legal norms and remedies. In the case of *Love Island Albania* (TV Klan), the Complaints Council found that episodes broadcast in September and October 2023 contained eroticised dialogue and demonstrations aired in early-evening time slots accessible to children. The decision referenced specific provisions of the Broadcasting Code concerning warning symbols and the protection of minors and noted that, as a pre-recorded format, the content could

TABLE 4 Case A– R. T. complaints and visible outlet-side compliance.

Outlet	Original publication (year)	AMC decision date	Decision outcome	Recommended remedy (summary)	Observable outlet-side action*
Panorama Online	2020	24 June 2025	Complaint upheld	Withdraw or correct article; respect right to be forgotten; acknowledge complainant's youth and vulnerability	Uncertain
Elbasani Plus	2020	24 June 2025	Complaint upheld	Same as above	Uncertain
Tirana Sot	2020	24 June 2025	Complaint upheld	Same as above	Uncertain

\* "Observable outlet-side action" refers to corrections, apologies, or link-backs visible on the outlet's website during the observation window; "Uncertain" indicates that no such action was observable in the sources consulted.

have been edited prior to broadcast. Following the Council's proposal, AMA's Board imposed a financial sanction on TV Klan (Decision No. 83, 26 September 2023). In another high-audience format, *Për'puthen – They Match* (Top Channel), the Council issued a warning for threatening language used on air. In other cases (e.g., *Portokalli*), the Council explained findings of non-violation with reference to the applicable legal and code provisions. *The Love Island Albania* fine and the *Për'puthen* warning constitute smoking-gun evidence for the coercive remedy link in the statutory mechanism, as they demonstrate the transition from adjudication to enforceable sanction supported by explicit reasoning [Audiovisual Media Authority (AMA), 2024b].

### 5.2.3 Public communication and visibility

disseminates enforcement outcomes through periodic complaints bulletins and press releases, some of which are issued in English. Statements such as “349 complaints reviewed in 2024—the majority come from citizens” reflect a sustained practice of aggregate public reporting. While such communication does not in itself establish deterrent effects, it provides straw-in-the-wind evidence that statutory outcomes are made publicly visible. At the same time, the use of English-language communication for enforcement summaries raises questions of accessibility for domestic audiences, indicating that visibility does not automatically translate into broad public comprehension—an issue relevant to assessing accountability visibility in practice (Audiovisual Media Authority (AMA), 2025a, 2024b).

### 5.2.4 Interim inference

Within the broadcast domain defined by Law No. 97/2013 and the 2023 Broadcasting Code, Case B provides strong support for the statutory enforcement mechanism. Jurisdictional and capacity-related hoop tests are satisfied; smoking-gun evidence is present in the form of a monetary sanction and warnings in named, high-audience programmes; and public dissemination practices provide additional, suggestive support for accountability visibility. While these observations do not demonstrate shifts in complaint-routing behavior, they do show that statutory enforcement produces salient and coercive outcomes within its jurisdiction, thereby establishing the conditions under which statutory regulation may be perceived as a prominent route to redress in the audiovisual sector.

## 5.3 Case C – policy process: the anti-defamation package (2019–2024)

Case C examines how domestic veto points and international legal scrutiny conditioned the trajectory of proposals to expand statutory media regulation in Albania between 2019 and 2024. Rather than treating the episode as a conflict between statutory regulation and self-regulation as such, the analysis focuses on whether the proposed expansion of the Audiovisual Media Authority's (AMA) mandate complied with internationally recognized standards of scope, independence, proportionality, and due process. The process-tracing proposition is that parliamentary adoption would activate domestic constitutional checks and external review by European institutions, and that these interventions—if targeting core design defects rather than marginal issues—would significantly reshape the prospects for implementation. The diagnostic expectation is a sequence of necessary hoop events (adoption; activation of a domestic veto), followed by

probative evidence that international assessments identified structural legal flaws, and culminating in an outcome signal consistent with sustained constraint (policy stalling or withdrawal).

### 5.3.1 The Adoption of the legislative package

On 18 December 2019, Parliament adopted the so-called anti-defamation package, which sought to regulate “electronic publications service providers” by bringing them under the audiovisual statute and empowering AMA to impose administrative penalties. Contemporary reporting documents the vote, the scope of the proposals, and the immediate objections raised by journalists and European actors [Reuters, 2019; Voice of America (VOA), 2019]. The Venice Commission's background summary confirms that the amendments were framed as an extension of the audiovisual regulatory regime rather than as part of civil or criminal defamation law (Venice Commission, 2020, paras. 10–11). This body of evidence satisfies a hoop test for the initial policy change.

### 5.3.2 Activation of a domestic veto

In January 2020, the President returned the laws to Parliament, citing constitutional and freedom-of-expression concerns (Balkan Insight, 2020). The veto interrupted the adoption-to-implementation sequence and activated a high-salience internal check. While the ruling majority signaled an intention to override, the veto created a window in which European institutions intensified scrutiny and requested an expert opinion from the Venice Commission (Exit.al, 2020). This step satisfies a second hoop test, establishing the presence of an effective domestic veto point.

### 5.3.3 International legal scrutiny and identification of design defects

In June 2020, the Venice Commission issued an opinion identifying multiple structural deficiencies in the draft amendments. First, it found that the scope of regulation was “defined too broadly, as covering all sorts of online publications and resources,” raising concerns about overreach beyond editorial media actors (Venice Commission, 2020, paras. 30–31). Second, it warned that the composition and appointment rules for AMA and its Complaints Committee raised “legitimate concerns of independence,” particularly in light of domestic perceptions regarding political influence (paras. 33–36). Third, it characterized the proposed fines as “severely punitive and debilitating” for the Albanian media market, noting the absence of criteria to differentiate between large media organisations and small-scale or individual publishers (paras. 63–65). Finally, it criticized the lack of suspensive effect on appeal, whereby fines would be immediately enforceable, as incompatible with basic due-process safeguards (para. 66). Taken together, these findings constitute smoking-gun evidence that international scrutiny targeted fundamental design flaws rather than peripheral or technical aspects of the proposal (Venice Commission, 2020).

Outcome: policy stalling and withdrawal: Subsequent developments align with the constraining effects identified above. The European Commission's, 2023 Albania report records that the anti-defamation package was removed from Parliament's agenda in November 2022 and stresses that any future regulatory changes must conform to European standards and Venice Commission guidance

(European Commission, 2023). In March 2024, Council of Europe monitoring similarly noted the withdrawal from the legislative agenda while continuing to flag concerns about defamation and disproportionate sanctions (Council of Europe, 2024). By September 2024, media reporting indicated that the government would formally withdraw the controversial provisions (Euractiv, 2024). While a formal repeal instrument had not yet been published at the time of writing, these developments provide a consistent outcome signal of non-implementation under sustained domestic and international constraints.

### 5.3.4 Interim inference

The reconstructed sequence supports the proposed mechanism. Parliamentary adoption and activation of a domestic veto satisfy necessary hoop tests, while the Venice Commission's opinion supplies smoking-gun evidence that the initiative conflicted with core principles of proportionality, independence, and due process. The subsequent removal from the legislative agenda and withdrawal signals are congruent with these pressures and with Albania's EU accession incentives. Importantly, the episode does not demonstrate resistance to statutory regulation of online media per se; rather, it shows how international and domestic constraints conditioned the acceptable design of such regulation. As a contingent outcome, the episode preserved—during the period under study—the existing division of competences between statutory audiovisual oversight and voluntary press and online self-regulatory arrangements.

## 6 Cross-case synthesis

Taken together, the three cases illuminate how Albania's mixed media-accountability architecture operates in practice, and where its strengths and limitations lie. Rather than demonstrating displacement or dominance of one mechanism over another, the evidence points to asymmetric accountability visibility across sectors, shaped by differences in mandate, remedy type, and publication practices.

Voluntary self-regulation (Case A) demonstrates that the institutional preconditions for ethical accountability are in place. Procedural rules are clearly specified; jurisdiction is defined; complaints are docketed and adjudicated; and reasoned decisions are made publicly available. These observations satisfy necessary conditions for the front half of the hypothesized mechanism linking institutional design to accountability visibility. However, the final step—observable outlet-side implementation of remedies—remains indeterminate in the examined case. This indeterminacy does not imply non-compliance, particularly in privacy-sensitive disputes such as right-to-be-forgotten claims, but it limits what can be inferred about the visibility of corrective action at the point of content consumption. The voluntary pillar thus demonstrates procedural robustness, but uneven empirical leverage on the final link between decision and observable remedy.

Statutory regulation (Case B), by contrast, exhibits a more direct and consistently observable enforcement sequence within its audiovisual remit. AMA's legal authority and monitoring capacity translate into reasoned decisions that culminate in warnings or financial sanctions, which are publicly documented in complaints bulletins and

press communications. Named sanctions in high-audience programmes provide decisive evidence that coercive remedies are implemented and made visible. This does not establish deterrence or behavioral change beyond the cases examined, nor does it demonstrate shifts in complaint-routing behavior. What it does establish is that statutory enforcement produces salient accountability outcomes within the broadcast sector, supported by formal sanctioning power and routine public reporting.

The policy-process case (Case C) situates these sector-specific findings within a broader institutional context. The anti-defamation package episode shows how domestic veto points and international legal scrutiny conditioned the acceptable design of statutory expansion into online media. Crucially, the episode does not indicate resistance to statutory regulation of online content per se. Rather, it demonstrates that proposals failing to meet standards of proportionality, independence, and due process were effectively blocked. As a contingent outcome, the existing division of competences—statutory oversight for audiovisual media and voluntary self-regulation for press and online journalism—remained in place during the period under study. This preserved institutional pluralism, not as a normative endpoint, but as the result of conditional constraints.

Across the three cases, a consistent pattern emerges. Accountability visibility is highest where remedies are coercive, standardized, and routinely publicised, as in the statutory broadcast sector. In contrast, voluntary self-regulation relies more heavily on outlet-side signaling, which may vary by case type and normative context. This asymmetry does not imply substitution or crowding-out as an observed effect. Rather, it identifies differentiated visibility conditions under which the two mechanisms operate.

From a process-tracing perspective, the main hypothesized mechanism is partially supported. The link between institutional design and the public availability of decisions is robust across both pillars. The link between decision and observable remedy is strong in the statutory case and indeterminate in the voluntary case examined. Importantly, the analysis does not demonstrate that these differences translate into systematic changes in complaint-routing behavior, nor that statutory enforcement displaces voluntary mechanisms. Such effects remain conditional hypotheses, not empirical findings of this study.

### 6.1 Rival mechanisms revisited

Revisiting the rival mechanisms in light of the cross-case evidence further clarifies the study's inferential boundaries. The state-centric substitution mechanism is partially supported at the level of conditions, but not at the level of outcomes. Case B confirms that statutory enforcement produces more salient and coercive remedies within the audiovisual sector. Case A shows that voluntary remedies may be less visibly implemented at the outlet level in certain types of disputes. Together, these findings establish the possibility of substitution under specific conditions—namely where statutory remedies are clearly applicable and more visibly enforced. However, the study does not provide direct evidence that complainants actively redirect disputes away from voluntary bodies toward AMA, nor that voluntary complaint volumes decline as a result. Substitution therefore remains a plausible but unobserved mechanism, consistent with the literature but not demonstrated in the Albanian cases examined.

The litigation and legal-risk sensitivity mechanism, often discussed in relation to SLAPPs, operates in the background rather than

as a traceable within-case sequence. Aggregate indicators point to a challenging legal environment for media actors, but the available documentary evidence does not allow reconstruction of specific causal chains linking legal threat to engagement or non-engagement with voluntary accountability bodies. Importantly, contemporary EU regulatory frameworks also recognize that legal risk may incentivise participation in self- or co-regulatory schemes as a form of due diligence. For these reasons, legal-risk sensitivity is best treated as a contextual conditioning factor that may interact with both statutory and voluntary mechanisms in different ways, rather than as a unidirectional deterrent.

## 7 Discussion and conclusions

This study examined how Albania's mixed media-accountability system operates in practice and under what conditions voluntary self-regulation and statutory oversight generate visible accountability outcomes. Using theory-testing process tracing across three cases, the analysis shows a system that is institutionally plural and procedurally functional, but marked by asymmetric accountability visibility across sectors.

The voluntary self-regulatory pillar demonstrates strong procedural foundations: clear rules, defined jurisdiction, and publicly available, reasoned decisions that align with European standards for profession-led accountability. At the same time, the visibility of remedial action at the outlet level cannot be consistently established on the basis of documentary evidence, particularly in privacy-sensitive cases. This indeterminacy should not be read as non-compliance or institutional weakness, but as a structural feature of voluntary systems whose effectiveness often depends on corrective practices that are not always normatively appropriate to publicise.

By contrast, statutory regulation in the audiovisual sector produces more consistently observable accountability outcomes. AMA's legal mandate, monitoring capacity, and sanctioning powers translate into warnings and fines that are formally documented and routinely reported. While the study does not demonstrate deterrence effects or changes in complaint-routing behavior, it shows that statutory enforcement benefits from structural visibility advantages linked to coercive remedies and standardized reporting practices.

The policy-process case further contextualizes these findings. The trajectory of the anti-defamation package illustrates how domestic veto points and international legal scrutiny conditioned the acceptable design of statutory expansion into online media. The episode reflects not opposition to regulation per se, but resistance to regulatory designs that failed to meet standards of proportionality, independence, and due process. As a contingent outcome, the existing division of competences between statutory audiovisual oversight and voluntary press and online self-regulation remained in place during the period under study.

Taken together, the findings support a qualified version of the hypothesized mechanism. Institutional design is strongly linked to the public availability of decisions across both pillars. The transition from decision to observable remedy is robust in the statutory case and indeterminate in the voluntary case examined, due to normative constraints and limits of the public record. Importantly, the study does not demonstrate systematic substitution, crowding-out, or

forum shopping; differences in accountability visibility identify conditions of operation, not behavioral outcomes.

From a policy perspective, the analysis points to the value of coordination without subordination. Clearer referral practices, jurisdictional signaling, and reciprocal transparency between statutory and voluntary bodies could enhance predictability while preserving institutional independence. Improvements in documentation and aggregation of self-regulatory decisions—where normatively appropriate—would further strengthen accountability visibility. These steps are consistent with the European Media Freedom Act's emphasis on independent yet coordinated regulatory frameworks.

The conclusions are necessarily bounded by the nature of the evidence. Documentary sources allow reconstruction of institutional processes and visible outcomes, but not direct assessment of audience perceptions or longitudinal complaint-routing behavior. Future research combining process tracing with surveys, interviews, or extended time-series data could further examine how accountability visibility shapes engagement with media redress mechanisms.

In sum, Albania's media-accountability system is neither dysfunctional nor dominated by a single regulatory logic. It is plural, conditional, and unevenly visible. Strengthening coordination, transparency, and legal safeguards within an EMFA-consistent framework offers a path to enhancing accountability while preserving editorial freedom and institutional independence.

## Data availability statement

The original contributions presented in the study are included in the article/supplementary material, further inquiries can be directed to the corresponding authors.

## Author contributions

BB: Methodology, Supervision, Conceptualization, Resources, Validation, Funding acquisition, Writing – review & editing. AX: Formal analysis, Writing – original draft, Data curation, Methodology, Conceptualization.

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The author(s) declared that this work was conducted in the absence of any commercial or financial relationships that could be construed as a potential conflict of interest.

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The author(s) declared that Generative AI was not used in the creation of this manuscript.

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