



REFORMS AT AN IMPASSE

Monitoring Report on the Implementation of
the Rule of Law Strategy
and the Action Plan 2025–2026



In-depth analysis of the rule of law in Kosovo based on key findings on institutional mechanisms, monitoring, and implementation.



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ABOUT KLI

KLI – the Kosovo Law Institute is a non-governmental and non-profit public policy organization and think tank specialized in the justice sector

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Contents

1. Executive Summary	6
2. Methodology for Monitoring and Evaluating the Implementation of the Rule of Law Strategy	7
3. Functional Review and the Rule of Law Strategy.....	7
4. Expectations from the Functional Review of the Rule of Law Sector and the Rule of Law Strategy	8
5. Failure to adopt the Action Plan within the required timeframe, leaving the strategy unimplementable for one year	12
6. Review of the Rule of Law Strategy	13
7. Action Plan 2025–2026.....	15
8. Budgeting of the Strategy	18
9. Monitoring of the Implementation of the Rule of Law Strategy	20
10. Fulfilment of Actions According to Strategic Objectives and Responsible Institutions.	22
11. Compliance of the Legislative Program with the Action Plan	38
12. What Was Intended vs. What Was Achieved through the Rule of Law Strategy	40
13. Lack of Monitoring of the Rule of Law Strategy	42
14. How the Government Should Approach the Rule of Law after the End of the Strategy	43
15. Recommendations	44

List of Abbreviations

FRRLS – Functional Review of the Rule of Law Sector

RoLS – Rule of Law Strategy

RoLS AP – Action Plan for the Implementation of the Rule of Law Strategy

MoJ – Ministry of Justice

MoIA – Ministry of Internal Affairs

KJC – Kosovo Judicial Council

KPC – Kosovo Prosecutorial Council

KMC – Kosovo Mediation Chamber

KPCE – Kosovo Private Enforcement Chamber

KLI – Kosovo Law Institute

FLAA – Free Legal Aid Agency

Legislation Committee – Committee on Legislation, Mandates, Immunities, Rules of Procedure of the Assembly and Oversight of the Anti-Corruption Agency

KCS – Kosovo Correctional Service

KPS – Kosovo Probation Service

JA – Justice Academy

ACA – Anti-Corruption Agency

KBA – Kosovo Bar Association

IPA – Information and Privacy Agency

KP – Kosovo Police

CPCRK – Criminal Procedure Code of the Republic of Kosovo

1. Executive Summary

The Rule of Law Strategy 2021–2026 represents the principal strategic document for justice sector reform in Kosovo, aiming to strengthen the judiciary, increase institutional efficiency, and improve access to justice. However, the findings of this report indicate that implementation of the Strategy during 2025 was characterized by limited progress, a high level of unimplemented activities, and a lack of sustainable results in practice.

One of the most significant challenges affecting implementation of the Strategy was the absence of an Action Plan during 2024, followed by the delayed adoption of the 2025–2026 Action Plan only in February 2025. Consequently, the Strategy operated for a considerable period without a clear operational framework for implementation, monitoring, and reporting.

Furthermore, the revised Action Plan retained significant shortcomings, particularly in terms of financial planning, prioritization of activities, and linking reforms to concrete and measurable outcomes. The absence of costing for the majority of activities and the lack of budget impact assessment raise concerns regarding the compliance of this document with the applicable regulatory framework.

At the same time, 2025 was characterized by a significant institutional and political crisis, associated with parliamentary elections, governance by a caretaker government, and the prolonged failure to constitute the Assembly. These circumstances directly affected the adoption of draft legislation, the operationalization of the Strategy’s mechanisms, and interinstitutional coordination for implementation of planned reforms. As a result, a considerable number of activities remained at the stage of drafting, public consultation, or initial institutional procedures.

Monitoring of strategic and specific objectives indicates that progress has been uneven across different sectors of justice. Within the judicial and prosecutorial systems, delays were identified in legal reform, transparency, and procedural efficiency, while progress in criminal justice was more limited in areas related to juvenile justice, asset confiscation, and institutional coordination mechanisms. In the area of access to justice, cooperation with the public, and engagement with civil society, the majority of activities remained either unimplemented or only partially implemented.

Nevertheless, the report also identifies several positive developments, including the establishment of the Administrative Court, advancement of certain electronic systems, delivery of professional training, and progression of several priority draft laws. In addition, some institutions demonstrated more visible progress in digitalization, professional capacity building, and institutional cooperation.

Overall, the findings indicate that the Rule of Law Strategy has not achieved the intended level of reform, while implementation during 2025 was characterized by a lack of sustainable progress,

unimplemented activities, weak financial planning, and inadequate institutional coordination, highlighting the need for more functional mechanisms for planning, monitoring, and implementation of reforms in practice.

2. Methodology for Monitoring and Evaluating the Implementation of the Rule of Law Strategy

Monitoring of the implementation of the Rule of Law Strategy was based on a systematic analysis of strategic documents and relevant public sources. Initially, the Mid-Term Review of the Strategy, as well as the Action Plan, were examined, from which all activities planned for 2025 were identified and categorized according to each responsible and supporting institution.

The assessment of implementation progress was primarily based on publicly available data. Sources of information included official institutional websites, the Official Gazette, Government decisions, annual institutional reports, reports of the Kosovo Judicial Council (KJC), reports of the Kosovo Prosecutorial Council (KPC), as well as publications and announcements on social media and visual and electronic media in the country. In addition to publicly available information, KLI conducted meetings with representatives of relevant institutions, including the Ministry of Justice, Kosovo Judicial Council, Kosovo Prosecutorial Council, Justice Academy, and the Chamber of Private Enforcement Agents, as well as through comments and contributions received from the Kosovo Police, Kosovo Correctional Service, Kosovo Probation Service, Kosovo Academy for Public Safety, Chamber of Mediators, and the Office of the Prime Minister.

For each identified activity, an assessment of the implementation status was conducted based on the available evidence. Activities were classified, as presented in the Action Plan, into three categories: implemented, partially implemented, and not implemented. In cases where no public information was available, or where institutions did not provide evidence demonstrating implementation of an activity, the activity was considered not implemented, reflecting an approach based on transparency and evidence.

This methodological approach aims to provide an objective and verifiable overview of the level of implementation of the Strategy, relying on open sources, information provided by relevant institutions, and comparative analysis between planned activities and actual developments in practice.

3. Functional Review and the Rule of Law Strategy

The Functional Review of the Rule of Law Sector (FRRLS) represents a comprehensive analytical and assessment process initiated by the Government of Kosovo and approved in 2016, with the aim of addressing structural and functional deficiencies within the rule of law sector. Its implementation began in 2018 and developed through several interconnected analytical and consultative phases involving justice institutions, civil society, and international partners.

The first phase of the process focused on identifying key shortcomings and challenges within institutions of the rule of law sector. Based on these findings, the second phase advanced into an in-depth sectoral analysis, materialized through the development of 16 policy documents. These documents contain key recommendations and are structured around four main pillars: (1) the judicial and prosecutorial system; (2) criminal justice; (3) access to justice and non-judicial services; and (4) fight against corruption, forming the analytical basis for reform interventions in the sector.

The process culminated in 2020 with the approval of these recommendations by the Steering Committee, paving the way for drafting the Strategy and its Action Plan. As a result, the Rule of Law Strategy 2021–2026¹ was adopted in 2021 and represents the only strategic document in this field. The Strategy defines the vision, objectives, and mechanisms for implementation, monitoring, and reporting, structured around four fundamental objectives: strengthening the judicial and prosecutorial system, reinforcing criminal justice, improving access to justice, and intensifying anti-corruption efforts.

In this context, the Rule of Law Strategy represents the outcome of a detailed analytical and consultative process under the FRRLS, directly operationalizing its findings and recommendations into concrete reform measures and actions. The Rule of Law Strategy serves as the principal guiding framework for transforming the rule of law sector, with the aim of increasing efficiency, transparency, accountability, and citizens' trust in justice institutions.

4. Expectations from the Functional Review of the Rule of Law Sector and the Rule of Law Strategy

The Functional Review of the Rule of Law Sector (FRRLS) was conceived as the most comprehensive and ambitious reform intervention in Kosovo's justice sector since independence. Initiated in 2018 and implemented in several phases until 2021, the process aimed to systematically address structural problems within the sector through in-depth analysis and a clear package of recommendations translated into concrete policies. The final outcome of this process, the Rule of Law Strategy 2021–2026, was presented as a “historic milestone” for justice reform and as a turning point toward building a more efficient, independent, and trustworthy system.

Expectations regarding the FRRLS and the Rule of Law Strategy were exceptionally high among domestic institutions, international partners, and civil society, reflecting the importance of the Strategy as a key document for advancing justice reforms in Kosovo. Kosovo institutions presented the Strategy as a comprehensive framework for addressing major challenges in the justice system, including increasing the efficiency of courts and prosecution offices, strengthening the fight

¹ Decision No. 04/2024 of the Government of Kosovo, Prishtina, 2021, available at: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=45816> (last accessed on 14 April 2026).

against corruption and organized crime, and improving interinstitutional coordination². In this regard, institutional expectations were that the Strategy would produce concrete and measurable results, contributing to increased citizens' trust in the justice system.

International partners also expressed their positions and expectations regarding this process. The Embassy of the United States described the FRRLS process and the resulting Strategy as a “massive undertaking” and a key milestone for strengthening the rule of law, emphasizing that its success depended on full ownership of the recommendations by domestic institutions and their implementation in practice³. Similarly, EULEX Kosovo welcomed the adoption of the Strategy as an important step toward strengthening the rule of law and aligning with European standards. However, their expectations were clearly conditioned on effective implementation, emphasizing the need for tangible results in combating high-level corruption, increasing institutional integrity, and guaranteeing judicial independence⁴.

In this context, the Strategy was viewed not merely as a policy document but as a test of Kosovo's commitment to genuine justice sector reforms. The positions of the US Embassy and EULEX reflected a clear expectation that the FRRLS and the Rule of Law Strategy should not remain merely an analytical exercise, but rather become a transformative process with real impact on the justice system.

Similarly, the European Union, through the European Commission Country Reports, consistently emphasized—from initiation of the Functional Review process through the latest implementation period of the Rule of Law Strategy (2019–2025)—the need for structural reforms in the judiciary, improvements in efficiency, increased accountability, and stronger anti-corruption measures. According to these reports, EU expectations regarding the FRRLS were high⁵, and the Rule of Law Strategy was perceived as a key instrument for addressing these requirements within the European integration process. In particular, the Country Reports highlighted the importance of

² Approval of the Draft Rule of Law Strategy 2021–2026 and Proposal – Decision on the Appointment of Members of the Commission for Recognition of the Status of Former Convicts and Former Political Prisoners, Prishtina, 2021. Available at: <https://betimiperdrejtesi.com/miratohet-drafti-i-strategjise-per-sundimin-e-ligjit-2021-2026-dhe-propozim-vendimi-per-emerimin-e-anetareve-te-komisionit-per-njohjen-e-statusit-te-ish-te-denuarve-dhe-ish-te-perndjekurve-p/> (last accessed on 14 April 2026).

³ U.S. Embassy in Kosovo, public statement on the occasion of the presentation of the Functional Review of the Rule of Law Sector (FRRLS) Strategy and Action Plan, 2021.

Available at: https://www.facebook.com/photo.php?fbid=5675590145800427&set=a.287337823425278&type=3&ref=embed_pos (last accessed on 14 April 2026).

⁴ EULEX Kosovo, statement regarding the Rule of Law Strategy.

Available at: <https://www.eulex-kosovo.eu/?page=1,11,2430> (last accessed on 14 April 2026).

⁵ See the European Commission Country Report for Kosovo 2020, page 5. For more information, see: https://enlargement.ec.europa.eu/system/files/2020-10/kosovo_report_2020.pdf. (last accessed on 14 April 2026).

effective implementation rather than formal adoption alone⁶, directly linking progress in the rule of law to Kosovo’s advancement toward EU integration.

From the perspective of donors, including USAID and various support projects in the justice sector, the FRRLS has been treated as the basis for orienting investments and technical assistance. Through multi-year programs, millions of euros and dollars have been invested in reforms related to court efficiency, transparency, digitalization, and strengthening justice institutions. These investments were closely linked to the expectation that the Rule of Law Strategy would serve as a sustainable framework for coordinating reforms and achieving measurable results⁷.

On the other hand, civil society, including the Kosovo Law Institute (KLI), expressed cautious support while maintaining a critical approach based on previous experiences with implementation of strategic documents. Domestic organizations emphasized that expectations no longer relate to the drafting of strategies, but rather to their actual implementation, calling for stronger monitoring mechanisms, greater transparency, and active involvement of non-governmental actors in assessing progress. Concerns were also raised that, in the absence of sufficient political will and administrative capacities, there is a risk that the Strategy may remain declarative and without tangible impact on improving the rule of law⁸.

What Was Expected to Be Achieved by 2026

The year 2026 was envisaged as the consolidation point of the reform process. Had the Strategy been fully implemented, Kosovo’s justice system was expected to be characterized by:

- a more efficient judiciary, with a significant reduction in unresolved cases;
- a more effective prosecutorial system in pursuing corruption and organized crime cases;
- stronger accountability and integrity mechanisms for judges and prosecutors;

⁶ In the 2023 Country Report, the European Commission assessed that implementation of the Rule of Law Strategy is progressing at a slow pace. For more information, see the European Commission’s Kosovo Report 2023, available at: https://enlargement.ec.europa.eu/system/files/2023-11/SĚD_2023_692%20Kosovo%20report_0.pdf (last accessed on 10 May 2026).

⁷ The United States, through USAID-supported programs, has supported processes aimed at implementing recommendations envisaged under the Rule of Law Strategy. One such initiative was the Commercial Justice Program, which contributed to the establishment of the Commercial Court and increased the number of cases resolved through alternative dispute resolution mechanisms. For more information on this program, see: <https://www.ruleoflawideas.org/wp-content/uploads/2025/08/Kosovo-Commercial-Justice.pdf> (last accessed on 10 May 2026).

⁸ Statements by the Executive Director of the Kosovo Law Institute (KLI), available at: <https://fokusi.info/miftaraj-vv-ja-ka-deshtuar-krejttesisht-ne-zbatimin-e-strategjise-per-sundim-te-ligjit/>, as well as KLI’s report on the failure of justice reforms, in which KLI assesses that due to government actions, implementation of the Strategy has become unfeasible. For more information, see the report “The Failure of Justice Reform”, available at: KLI – The Failure of the Justice Reform: <https://kli-ks.org/wp-content/uploads/2024/12/The-Failure-of-the-Justice-Reform.pdf> (last accessed on 10 May 2026).

- easier and more equitable access to justice for citizens;
- a functional asset confiscation system and stronger anti-corruption mechanisms.

These expectations were not merely political aspirations but were directly linked to specific performance indicators, intended to measure progress in implementation of the Strategy. In this sense, 2026 was not simply the end of a strategic cycle, but rather a test of the credibility of the reform as a whole.

However, KLI's findings over the years indicate that these expectations have not been achieved in practice. Since the beginning of implementation of the Strategy, persistent problems have been identified relating to the mismatch between planning and actual implementation of activities, as well as the lack of concrete results on the ground.

In its 2022 report, KLI found that despite relatively positive statistical reporting regarding implementation of activities, a considerable number of them had not been implemented in accordance with the Strategy. It was observed that institutions had undertaken actions deviating from the objectives of the Rule of Law Strategy, while reporting on implementation was often inaccurate and did not reflect the actual situation in practice.⁹

The same report identified concrete cases where activities had been reported as implemented or partially implemented, although in reality they had failed to produce the expected results. This created a significant gap between reported progress and actual progress, raising concerns regarding the credibility of institutional monitoring mechanisms.

Findings from the 2023 report confirmed continuation of these problems. KLI concluded that implementation of the Strategy continued at a slow pace, while the absence of adequate budgeting constituted a serious obstacle to implementation of planned activities. Furthermore, institutional reporting remained inaccurate, presenting a more positive picture than the actual reality of implementation¹⁰.

Another fundamental issue identified in 2023 was the failure to fulfil procedural obligations of the Strategy itself. The absence of a mid-term review and failure to approve a new Action Plan within the prescribed timeframe created an implementation vacuum, leaving the Strategy without functional implementation mechanisms.

⁹ (Mos) Zbatimi i Strategjisë së Sundimit të Ligjit në Praktikë. <https://kli-ks.org/wp-content/uploads/2023/10/Mos-Zbatimi-i-Strategjise-se-Sundimit-te-Ligjit-ne-Praktike-1.pdf> (Qasur për herë të fundit 14.04.2026).

⁹ KLI, (Non-)Implementation of the Rule of Law Strategy in Practice. Available at: <https://kli-ks.org/wp-content/uploads/2024/06/STRATEGJIA-NE-UDHEKRYQ-Raporti-i-monitorimit-te-Strategjise-per-Sundimin-e-Ligjit-dhe-Planit-te-Veprimit.pdf> (last accessed on 14 April 2026).

¹⁰ KLI, Strategy at a Crossroads – Monitoring Report on the Implementation of the Rule of Law Strategy and the Action Plan. Available at: <https://kli-ks.org/wp-content/uploads/2024/06/STRATEGJIA-NE-UDHEKRYQ-Raporti-i-monitorimit-te-Strategjise-per-Sundimin-e-Ligjit-dhe-Planit-te-Veprimit.pdf> (last accessed on 14 April 2026).

The findings of the 2025 report demonstrate that these challenges have not only persisted but, in certain cases, have deepened further. Across most strategic and specific objectives, unimplemented activities dominate, while progress remains largely confined to a formal level, such as drafting documents or initiating processes, without translating into tangible results¹¹.

In conclusion, KLI has analyzed each strategic objective and each specific objective of the Rule of Law Strategy, and the findings clearly demonstrate that expectations regarding consolidation of reform by 2026 have not been achieved. Implementation of the Strategy has been characterized by a lack of sustainable progress, reporting that has not always accurately reflected reality, and a predominance of unimplemented activities, leaving rule of law reform significantly short of its original objectives.

5. Failure to adopt the Action Plan within the required timeframe, leaving the strategy unimplementable for one year

One of the most serious failures in implementation of the Rule of Law Strategy 2021–2026 relates to the failure to adopt the Action Plan in a timely manner for the period following 2023, creating a one-year implementation vacuum in execution of the Strategy. While the Strategy clearly envisaged that its implementation would be carried out through structured and pre-approved Action Plans, the absence of a new plan for 2024 rendered the Strategy practically unimplementable during this period.

The initial 2021–2023 Action Plan constituted the primary instrument for implementation of the strategic objectives, encompassing hundreds of detailed activities distributed among responsible institutions¹². However, following expiration of this plan, institutions failed to approve a new Action Plan in time to ensure continuation of implementation of the Strategy, despite implementation reports having foreseen the need for revision and preparation of a new plan no later than the beginning of 2024¹³.

As a consequence, throughout 2024, the Strategy operated without an operational framework, without approved activities, without concrete timelines, and without allocation of institutional responsibilities. In the absence of an Action Plan, implementing institutions lacked a clear basis for implementation, monitoring, and reporting, reducing implementation of the Strategy to ad hoc and uncoordinated actions. This situation not only slowed reform processes but also undermined

¹¹ See below Chapter IX – Monitoring of the Implementation of the Rule of Law Strategy and each Strategic Objective.

¹² KLI, Strategy at a Crossroads – Monitoring Report on the Implementation of the Rule of Law Strategy and the Action Plan. Available at: <https://kli-ks.org/wp-content/uploads/2024/06/STRATEGJIA-NE-UDHEKRYQ-Raporti-i-monitorimit-te-Strategjise-per-Sundimin-e-Ligjit-dhe-Planit-te-Veprimit.pdf> (last accessed on 14 April 2026).

¹³ Annual Report on the Implementation of the Rule of Law Strategy, April 2024. Available at: <https://kryeministri.rks-gov.net/wp-content/uploads/2024/08/STRATEGJISE-PER-SUNDIMIN-E-LIGJIT-2021-2026-RAPORTI-2023.pdf> (last accessed on 14 April 2026).

the integrity of the Rule of Law Strategy framework itself by disconnecting strategic objectives from practical implementation.

The problem deepens further due to the fact that the new Action Plan 2025–2026 was adopted only at the end of February 2025, while retroactively claiming to cover a period that had already elapsed without any implementation framework in place. In practice, this means that throughout 2024 there were no timely approved and planned activities, effectively making that year a lost period in implementation of the Strategy.

Overall, the delay in adoption of the Action Plan reflects a serious lack of strategic planning and institutional coordination, directly undermining effective implementation of the Rule of Law Strategy. A strategy without an action plan cannot produce results, and in this case, the absence of such an instrument for an entire year constitutes a structural failure in management of rule of law reform.

6. Review of the Rule of Law Strategy

The Rule of Law Strategy 2021–2026, adopted in July 2021 as a product of the Functional Review of the Rule of Law Sector (FRRLS) process, underwent a mid-term review during 2024, which was finalized and approved in February 2025. This review was envisaged as a mechanism to assess progress and recalibrate necessary interventions toward achieving the strategic objectives by 2026.

The process was conducted under the coordination of the Ministry of Justice and, formally, was based on sectoral analyses and the work of interinstitutional groups. However, analysis of the revised document suggests that the process was more procedural than substantive, failing to fully reflect existing data regarding implementation of the Strategy. The proposed interventions largely maintain the existing structure of the Strategy while adding a number of new actions, without clearly demonstrating how these interventions derive from a genuine analysis of previous performance.

Despite claims aimed at improving the effectiveness of the Strategy, the mid-term review presents serious shortcomings, limiting its analytical and strategic value.

First, the review fails to provide a structured and evidence-based assessment of the actual level of implementation of the Strategy. For example, according to annual implementation reports, only a portion of activities were fully implemented, while a considerable percentage remained partially implemented or unimplemented (e.g., approximately 43% fully implemented, 45% partially implemented, and 12% unimplemented for the period 2021–2022). However, these findings are not systematically reflected in the mid-term review, creating a clear gap between factual data and the analysis presented.

Second, the document does not clearly identify or substantiate the structural and institutional obstacles affecting the Strategy's weak performance. Although annual implementation reports explicitly identify key factors such as lack of interinstitutional coordination, weaknesses in planning, and limitations in budgetary and human capacities, these issues are not substantively addressed in the review. For instance, the 2022 Annual Report emphasizes that implementation delays are directly linked to "lack of coordination among implementing institutions" and "insufficient budgetary and human capacities" (p. 3). Nevertheless, the mid-term review fails to develop an analysis of these factors or translate them into concrete corrective measures, reflecting a lack of institutional critical reflection on the actual causes of underimplementation.

Third, the review does not adequately utilize existing monitoring and reporting mechanisms. The Strategy envisaged a regular monitoring system through six-month and annual reports, as well as institutional mechanisms for validation of findings. However, the revised document lacks systematic integration of this data into strategic analysis. For example, although reports demonstrate uneven progress across objectives (with weaker performance in criminal justice compared to anti-corruption measures), these differences are not reflected in prioritization of measures within the review. Consequently, the revised document does not provide a reliable overview of what has worked and what has failed.

It should also be emphasized that adoption of the review occurred within a context of political instability, directly affecting the quality and legitimacy of the process. In 2025, Kosovo entered national elections and operated for a period under a caretaker government, while for a considerable period a significant number of government members reportedly remained unlawfully in office, and the Assembly remained un-constituted¹⁴. Furthermore, the justice reform process initiated in March 2024 generated disagreements between the executive branch and independent justice institutions such as the Kosovo Judicial Council (KJC) and the Kosovo Prosecutorial Council (KPC)¹⁵. This situation significantly limited opportunities for political debate, institutional coordination, and oversight of a strategic document of such importance.

Moreover, although the Strategy envisages the Steering Committee—the highest body responsible for oversight and validation of implementation—to meet at least twice per year and decide on key implementation matters, despite reportedly holding meetings, it has failed to influence effective implementation of the Strategy. KLI did not identify on institutional websites any evidence regarding Steering Committee meetings during this period, nor announcements or reports demonstrating its functioning. Unlike in 2022 and 2023, when meetings of this Committee were

¹⁴ KLI, Non-Implementation of Court Decisions – The Illegality of the Kurti Government and Abuse of Acting Positions. Available at: <https://kli-ks.org/wp-content/uploads/2025/09/Raporti-per-Qeverisje-te-kunderligjshme-dhe-UD-3.pdf> (last accessed on 14 April 2026).

¹⁵ Meetings held by representatives of the Kosovo Law Institute (KLI) with institutions responsible for implementation of the Strategy, conducted during the second week of May 2026.

publicly disclosed, the current lack of transparency makes it impossible to assess its role and effectiveness in implementation.

Overall, the mid-term review of the Rule of Law Strategy fails to fulfil its primary function as an instrument for strategic assessment and reorientation. Instead, it reflects a formalistic approach to updating the document, without in-depth evidence-based analysis or genuine engagement with implementation challenges. As such, the review does not provide a sustainable basis for the remaining implementation period of the Strategy and risks repeating the same structural shortcomings that have characterized implementation to date.

7. Action Plan 2025–2026

The Rule of Law Strategy Action Plan 2025–2026¹⁶, revised and approved in February 2025, essentially represents more a restructuring of existing measures than a new reform agenda. Analysis of the actions included in the 2025–2026 Action Plan compared to the 2021–2023 Action Plan shows that around 60% of the actions are carried over or reformulated, while only a smaller part consists of genuinely new actions resulting from the analyses conducted, as emphasized in the revised strategy.

One of the most visible problems is the lack of a clear connection with performance and results, since most actions are measured in “product/output” (approval of laws, trainings, documents), without measurable indicators for effects on efficiency, access to justice, or the fight against corruption and organized crime. For example, within Strategic Objective 1, macro indicators have been removed and only the World Justice Program Rule of Law Index indicator has remained. Likewise, neither the analysis nor the strategy describes what impact the actions proposed in the Action Plan may have on improving the rule of law. This reflects the absence of a substantial analysis of implementation of the previous 2021–2026 plan, making the current plan more an administrative continuation than a strategic correction.

Structurally, the plan introduces some changes, such as shifting from a thematic approach toward institutional and operational fragmentation of actions, as well as inclusion of the separate chapter on justice digitalization (4.1), which did not exist as such in the previous cycle. Although the revised Strategy treats digitalization as a separate strategic objective, most of the envisaged activities focus on development of platforms, interconnection of systems, or technical advancement of digital infrastructure, without clearly defining how these interventions will affect reducing the duration of procedures, reducing case backlog, or improving citizens’ access to justice. For example, interconnection of the SMIL system with other systems is mentioned as an

¹⁶ It should be noted that on the official website of the Ministry of Justice, the Action Plan is listed under the title AP 2024–2026, despite having been approved in February 2025.

activity, but no concrete performance indicators are defined to measure the effect of this integration on efficiency of courts and prosecution offices.

A more critical weakness relates to the financial aspect. Of all actions included in the Rule of Law Strategy Action Plan 2025–2026, only a very limited number—only several in the digitalization chapter—have a defined budget, while the remaining actions have no specified cost. Out of a total of 325¹⁷ actions included in the Action Plan 2025–2026, 253 are not budgeted, while only 72 actions have a defined financial cost for implementation. A particularly problematic issue, which contradicts the basic principles of drafting action plans and the logic of strategic planning, is the fact that within the Action Plan there are 9 actions that foresee budgetary costs for 2024, although the activities themselves are planned for implementation during 2025–2026. This implies that the plan is not accompanied by a genuine budget impact assessment, making it unclear how and with what resources the planned measures will be implemented, which again may affect their level of implementation.

Furthermore, this situation is not only a technical problem but also an issue of legal compliance. According to Article 34 of Government Regulation (GRK) No. 17/2024 on the Work of the Government, every strategic document must be accompanied by an assessment of financial impact and budget implications. In this context, approval of the Action Plan without clear budgeting for most actions raises questions regarding its compliance with the applicable regulatory framework, suggesting that the document may have been approved without fully meeting the required legal standards.

An additional risk relates to potential financial overlap with the EU Growth Plan¹⁸. Lack of coordination and harmonization of financing of actions under the Action Plan 2025–2026 may lead to situations of double financing of the same activities, as well as risk of non-disbursement of European Union funds. This risk becomes even more pronounced considering that the funds foreseen under the EU Growth Plan are significantly larger than the financial resources planned in the Strategy Action Plan. Consequently, lack of clear financial and institutional coordination may negatively affect both implementation of envisaged reforms and effective utilization of financial support from the EU. Reflection of the political crisis on implementation of the Strategy
The institutional crisis of 2025 began following the parliamentary elections of 9 February 2025, which produced a result without a clear parliamentary majority. Due to the inability to elect the Speaker of the Assembly and establish new institutions, the country remained for months with a non-functional Assembly and a caretaker Government. This situation directly affected

¹⁷ The approved Action Plan includes 325 actions, whereas the document MID-TERM REVIEW OF THE RULE OF LAW STRATEGY 2021–2026 states that there are 317 specific activities. This indicates a discrepancy in the figures presented across the official documents of the Ministry of Justice.

¹⁸ It is a principle under the EU Growth Plan that areas covered and financed by the European Union within the framework of the Plan should not receive parallel financing from other donors for the same activities or interventions, in order to avoid double financing, ensure complementarity of support, and maintain effective use and monitoring of funds.

implementation of the Rule of Law Strategy, especially considering that 2025 was the first year of implementation of the new Action Plan 2025–2026, which includes 325 concrete activities and five main objectives: judiciary and prosecution, criminal justice, civil and administrative justice, justice digitalization, and access to justice. In this context, findings of the Supreme Court regarding incompatibility between simultaneously exercising the function of Member of Parliament and Government member have direct implications for operation of Strategy mechanisms, including the Steering Committee chaired by the Minister of Justice, making the institutional situation more complex and raising questions regarding effective functioning of this mechanism during this period¹⁹.

One of the main consequences of the crisis was the delay in adoption of new legislation related to reform in the judicial and prosecutorial system. The revised Strategy foresees drafting and approval of the Draft Law amending and supplementing the Law on Disciplinary Liability of Judges and Prosecutors, as well as the Draft Law on recruitment, performance evaluation, integrity control and status of judges and prosecutors. Approval of these draft laws requires full parliamentary procedures, functioning parliamentary committees, and effective plenary sessions, which were absent during most of 2025.

In addition to these draft laws, the institutional crisis also affected postponement of a number of other legislative reforms envisaged under the Strategy and Action Plan 2025–2026. These include drafting the Draft Law amending and supplementing the Law on the Kosovo Judicial Council²⁰, so that only candidates who have not been politically active in the previous three years may be considered for membership in the KJC, as well as drafting the Draft Law on Courts based on the analysis for the new judicial map. Likewise, drafting of the Draft Law amending and supplementing the Law on the Justice Academy was also postponed.

The crisis also affected delays in legal reforms related to access to justice and protection of citizens' rights. In this regard, although workshops were held by the Ministry of Justice for drafting the new Law on Free Legal Aid, the same was not submitted for approval in the Government, while although drafting of the Law on Trial within a Reasonable Time was completed, and despite inclusion in the Legislative Program 2026–2028, the same was not approved by the Government of Kosovo because the country went to early elections²¹.

In the field of criminal justice and the fight against corruption, institutional blockage affected postponement of reforms related to confiscation of unlawfully acquired assets. This includes amendment of legislation on confiscation of assets so that a percentage of revenues from

¹⁹ The Supreme Court annuls the Administrative Instruction on the Use of Fiscal Electronic Devices, Fiscal Systems, and Fiscal Electronic Software. Available at: <https://betimiperdrejtesi.com/supremja-shfuqizon-udhezimin-administrativ-per-shfrytezimin-e-pajisjeve-elektronike-fiskale-sistemeve-fiskale-dhe-softuereve-elektronike-fiskale/> (last accessed on 14 April 2026).

²⁰ Activity 1, Chapter 1.1 of the Action Plan for the Implementation of the Rule of Law Strategy 2025–2026

²¹ Activity 9, Chapter 5.1 of the Action Plan for the Implementation of the Rule of Law Strategy 2025–2026

confiscation is allocated to justice sector institutions, as well as drafting of the Law on the State Bureau for Confiscation of Unjustified Assets. However, beyond delays in approval, KLI identified that drafting and processing of the Draft Law on the Bureau was characterized by attempts to circumvent regular parliamentary procedures, lack of public consultations, and arbitrary organization of consultations²². Consultation on this draft law was organized contrary to the Rules of Procedure of the Assembly, specifically without respecting the minimum notification period of five (5) days before holding the public hearing. Likewise, consultations were conducted within shortened deadlines and in a formal manner, limiting opportunities for substantive and inclusive treatment of the draft law²³. These approaches are contrary to the principles of transparency, inclusiveness, and legality promoted by the Rule of Law Strategy and directly affect the quality and legitimacy of reforms in this field.

At the same time, drafting of the Law amending and supplementing the Law on AAPSK remained unfinished, through which revision of the competencies of this agency is intended.

The crisis also had an impact on other areas related to civil and property justice. One activity that remained unfinished was the Law on Construction Land, which has particular importance for treatment of property issues and economic development. Likewise, delays in functioning of institutions affected the absence of financial support for the justice sector, including allocation of a larger budget for the Justice Academy, aimed at increasing efficiency of training for judges and prosecutors.

Institutional blockage also affected functioning of the Strategy Steering Committee and its monitoring mechanisms. The Strategy relies on regular reporting, interinstitutional coordination, and continuous monitoring of activities by responsible institutions. In the absence of fully functioning institutions and political prioritization, a considerable part of institutional energy appears to have shifted from justice reforms toward management of the political crisis. This affected not only delays in concrete activities but also weakening of coordination between the Ministry of Justice, Assembly, KJC, KPC, and other institutions responsible for implementation of the Strategy.

8. Budgeting of the Strategy

KLI, in its reports monitoring the implementation of the Rule of Law Strategy for 2022 and 2023, found that the Strategy and the Action Plan were implemented at a slow pace, while the lack of budget and capacities constituted one of the main obstacles to implementation of activities. The

²² KLI: The Assembly should not circumvent procedures regarding the Draft Law on the Bureau. Available at: <https://kli-ks.org/ikd-kuvendi-te-mos-shmange-procedurat-per-projektligjin-per-byrone/> (last accessed on 03 May 2026).

²³ KLI: We do not participate in formal consultations on the Draft Law on the Bureau. Available at: <https://kli-ks.org/ikd-nuk-marrim-pjese-ne-konsultime-formale-per-projektligjin-per-byrone/> (last accessed on 03 May 2026).

reports emphasized that only a small portion of planned funds had been spent²⁴, while the most costly activities remained unimplemented²⁵.

In the Mid-Term Review of the Rule of Law Strategy 2025–2026, the issue of budgeting was addressed in only one short paragraph, less than half a page, stating that budget impact and assessment of financial needs would be completed following public consultations. The document highlights that after completion of consultations, a more accurate cost assessment of activities envisaged in the Action Plan would be conducted; however, the final revised version does not provide concrete data regarding reform costs, financial sources, or institutions responsible for covering these costs. For a strategy foreseeing hundreds of activities and complex reforms, such limited treatment of the budgetary aspect indicates a serious lack of financial planning.

Despite the fact that the revised Strategy envisages 317 concrete activities and includes numerous reforms in the judicial system, criminal justice, civil and administrative justice, digitalization, and access to justice, the document does not explain which institutions will cover the costs of these reforms or under which budget lines they have been planned. In the absence of such clarification, there is a risk that a significant number of activities will remain merely obligations on paper, without real possibilities for implementation.

This approach, in addition to being contrary to the applicable regulatory framework governing approval of strategic documents, as explained above, also contradicts the principles upon which the Rule of Law Strategy itself was built. The Strategy foresees full synchronization with government policy planning documents and budget documents. This implies that every activity and every reform should have clear financial support, foreseen in advance within the budget documents of responsible institutions. In practice, this did not occur during the first phase of the Strategy, nor in its mid-term review.

The lack of budget planning becomes even more problematic considering that the Law on Budget Appropriations for 2025 and the Law on Budget Appropriations for 2026 clearly stipulate that for every new initiative, including strategies and legislation, the proposing body must submit a Budget Impact Assessment Form to the Ministry of Finance²⁶. The Ministry of Finance is then obliged to assess the impact on the budget for at least the following three fiscal years. However, the revised

²⁴ KLI, (Non-)Implementation of the Rule of Law Strategy in Practice. Available at: <https://kli-ks.org/wp-content/uploads/2023/10/Mos-Zbatimi-i-Strategjise-se-Sundimit-te-Ligjit-ne-Praktike-1.pdf> (last accessed on 03 May 2026).

²⁵ KLI, Strategy at a Crossroads – Monitoring Report on the Implementation of the Rule of Law Strategy and the Action Plan. Available at: <https://kli-ks.org/wp-content/uploads/2024/06/STRATEGJIA-NE-UDHEKRYQ-Raporti-i-monitorimit-te-Strategjise-per-Sundimin-e-Ligjit-dhe-Planit-te-Veprimit.pdf> (last accessed on 03 May 2026).

²⁶ Article 17, Law No. 10/L-001 on Budget Appropriations for the Budget of the Republic of Kosovo for 2026, Prishtina, 2026. Available at: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=117682> (last accessed on 14 April 2026).

Strategy documents do not demonstrate that such an assessment was conducted or clearly integrated into budget documents.

Likewise, in the textual sections of the budget appropriation laws for 2025 and 2026, the Rule of Law Strategy is not mentioned at all as a specific strategic document requiring financing. Its title does not appear either within the performance annex by policy sectors or in sections describing strategic documents of the Ministry of Justice²⁷.

The absence of a clear financial framework, besides risking implementation of the Strategy as a whole, also directly threatens realization of the most costly and complex activities under the Strategy. This includes reform of the recruitment and evaluation system for judges and prosecutors, digitalization of justice, strengthening the free legal aid system, increasing capacities of the Justice Academy, as well as operationalization of new mechanisms for asset confiscation and combating corruption. Without financing, these reforms risk facing the same fate as unimplemented activities during the 2021–2023 period.

Furthermore, the absence of financial planning weakens functioning of the Strategy's monitoring and coordination mechanisms. The Steering Committee, the interinstitutional coordination body, and the Secretariat have important responsibilities for oversight and reporting on implementation of the Strategy. However, if responsible institutions lack clarity regarding which financial resources will be available and from which sources activities will be financed, monitoring of implementation remains formalistic and detached from financial realities.

In conclusion, the mid-term review of the Rule of Law Strategy 2025–2026 has maintained the same fundamental problem identified in previous reports: the absence of clear budget planning. Although the Strategy envisages numerous reforms and concrete activities, it does not indicate how these will be financed, which institutions will provide resources, or in which budget documents they have been planned. Consequently, there is a serious risk that this phase of the Strategy will face the same obstacles that characterized the previous implementation period.

9. Monitoring of the Implementation of the Rule of Law Strategy

Monitoring of the implementation of the Rule of Law Strategy for 2025 indicates that progress in achieving the strategic and specific objectives has varied across different sectors of justice. In a considerable number of areas, delays in implementation of the planned activities have been identified, while in some areas certain developments have been recorded, particularly regarding drafting of legislation, public consultations, operationalization of institutional mechanisms, and advancement of electronic systems. In this context, it should be taken into account that 2025 was

²⁷ Law No. 10/L-001 on Budget Appropriations for the Budget of the Republic of Kosovo for 2026, p. 678, Prishtina, 2026. Available at: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=117682> (last accessed on 14 April 2026).

characterized by the absence of a Government with a full mandate and the failure to constitute the Assembly for a considerable period of time, circumstances which directly affected processing, approval, and implementation of part of the reforms and activities envisaged under the Rule of Law Strategy.

Within the judicial and prosecutorial system, progress has been limited, particularly regarding legal reforms, transparency, and procedural efficiency. Some key activities have advanced at the level of drafting, public consultations, and institutional processing; however, most of them were not finalized during 2025.

In the area of recruitment, integrity, and professional development of judges and prosecutors, steps have been taken toward drafting reforms and developing relevant documents; nevertheless, a considerable portion of activities have remained at initial stages or have been postponed to the following period.

Regarding criminal justice, progress has been uneven. In some areas, such as execution of criminal sanctions, developments have been identified in terms of trainings, rehabilitation programmes, and interinstitutional cooperation, whereas in other areas, such as juvenile justice and seizure and confiscation of assets, progress has been more limited.

In civil, commercial, and administrative justice, several positive developments have been identified, including operationalization of the Administrative Court, organization of trainings, and advancement of electronic systems. However, a number of strategic activities remained unimplemented or were only partially implemented during 2025.

In the field of digitalization of justice and free professions, concrete developments have been identified regarding operationalization of several electronic systems, organization of trainings, and advancement of professional and ethical acts. Nevertheless, overall progress has been affected by delays in approval of certain legal reforms and incomplete implementation of planned activities.

Finally, in the area of access to justice, cooperation with civil society, and communication with the public, awareness-raising activities, public consultations, and forms of institutional cooperation have been identified. However, implementation of activities in these areas has been uneven, and some of the planned mechanisms were not fully operationalized during 2025.

KLI has analysed each strategic objective, each specific objective, and each responsible institution regarding the level of implementation of activities envisaged under the Rule of Law Strategy and the Action Plan 2025–2026. The findings clearly show that implementation of the Strategy during 2025 has been characterized by lack of sustainable progress, predominance of unimplemented activities, and limited results in practice.

10. Fulfilment of Actions According to Strategic Objectives and Responsible Institutions

The analysis of the level of implementation of activities by responsible institutions demonstrates considerable disparities among institutions with regard to the execution of activities envisaged under the Rule of Law Strategy and the 2025–2026 Action Plan. In general, institutions have recorded more notable progress in activities related to training, digitalization, and institutional cooperation, whereas the lowest level of implementation has been identified in activities requiring legal reforms, interinstitutional coordination, policy adoption, and budgetary commitment.

No.	Institution	Implemented	Partially Implemented	Not Implemented	Total Activities
1	Ministry of Justice	32	7	59	98
2	Kosovo Judicial Council	11	11	9	31
3	Kosovo Prosecutorial Council	8	5	2	15
4	Assembly of Kosovo	1	0	2	3
5	State Bureau for Asset Verification and Confiscation	0	0	1	1
6	Kosovo Correctional Service	7	2	3	12
7	Kosovo Probation Service	0	1	4	5
8	Kosovo Police	1	0	1	2
9	Justice Academy	20	2	3	25
10	Kosovo Bar Association	2	1	2	5
11	Chamber of Notaries	1	0	0	1
12	Chamber of Private Enforcement Agents	1	0	0	1
13	Chamber of Bankruptcy Enforcement Agents	1	0	1	2
14	Free Legal Aid	2	0	1	3
15	Government of Kosovo/Office of the Prime Minister	1	0	1	2
16	Ministry of Finance, Labour and Transfers	1	0	0	1
17	Ministry of Internal Affairs	1	1	6	8
18	Kosovo Academy for Public Safety	2	0	0	2
19	Ministry of Health	0	0	1	1
TOTAL		92	30	96	218

Table 1. Level of implementation of activities by responsible institutions during 2025

The Ministry of Justice appears as the institution with the highest number of activities envisaged under the 2025–2026 Action Plan. Although the Ministry has implemented a number of activities, it has simultaneously recorded the highest number of non-implemented activities, particularly in the areas of legal reform, digitalization, liberal professions, and cooperation with the public and

civil society. A considerable number of activities remained at the drafting or public consultation stage without being finalized during 2025.

The Kosovo Judicial Council has demonstrated more notable progress compared to most other institutions, particularly in terms of digitalization, institutional interoperability, and the operationalization of the Administrative Court. In addition, the KJC has implemented a number of activities related to strengthening professional capacities and improving procedural efficiency. Nevertheless, several activities remained partially implemented or unimplemented, especially those related to the unification of judicial practice and the development of monitoring mechanisms.

The Kosovo Prosecutorial Council has implemented a portion of the activities related to institutional development and the enhancement of professional capacities. However, progress remains more limited in relation to certain strategic objectives, particularly activities requiring broad institutional coordination and procedural reforms.

The Justice Academy ranks among the institutions with the highest level of activity implementation, primarily through the organization of training sessions and professional programs for judges, prosecutors, and justice sector professionals. On the other hand, the Kosovo Correctional Service has achieved partial progress, especially in activities related to training, rehabilitation programs, and interinstitutional cooperation, while a number of strategic and infrastructural activities have remained unimplemented.

Other institutions, including the Ministry of Internal Affairs, the Kosovo Probation Service, the Free Legal Aid Agency, and professional chambers, recorded a more limited number of activities under the Action Plan, with partial and uneven progress in implementation.

Overall, the institution-based analysis indicates that the level of activity implementation was uneven and significantly affected by the lack of institutional coordination, administrative capacities, and political developments throughout 2025. A considerable number of activities remained unimplemented or were only partially implemented, reflecting continuing challenges in the effective implementation of the Rule of Law Strategy.

Strategic Objective 1: An Efficient, Professional, and Integrity-Based Judiciary and Prosecution System

Specific Objective 1: Efficiency, Transparency, and Discipline in the Judicial and Prosecutorial System

During 2025, a total of 19 activities were planned, of which only 3 were fully implemented, 6 were partially implemented, while 10 were not implemented at all. This indicates that only approximately 16% of the activities were fully completed during 2025. Of the activities that

remained unimplemented during 2025, four were fully implemented and two partially implemented during 2026, primarily in relation to the drafting of legislation and the initiation of institutional procedures.

Progress under this objective remained limited, and the majority of the planned activities were not completed within the prescribed deadlines. Several activities only began to be addressed during 2026, while in other cases concrete developments were identified, although these did not result in the completion of the activities within the envisaged timeframes.²⁸

From a legislative perspective, the draft laws on the Kosovo Judicial Council (KJC), the Kosovo Prosecutorial Council (KPC), the Disciplinary Liability of Judges and Prosecutors, as well as the Law on Free Legal Aid, were not adopted during 2025. Some of these draft laws were prepared during 2026, while the delays were also linked to the non-functioning of the Assembly and the Government during 2025. Regarding the Draft Law on Free Legal Aid, three working group workshops were held during 2025, and the draft law was finalized.²⁹ Furthermore, the completion of the composition of the KJC through the appointment of the non-judicial member was not achieved during 2025, although the process was finalized in 2026.³⁰

In terms of transparency and public communication, the KJC and the KPC did not develop comprehensive awareness campaigns regarding the disciplinary accountability system. The KPC stated that the activity was partially implemented through participation in conferences and discussions with institutional actors and civil society organizations. In addition, the KPC redesigned and updated its official website, where various documents and materials are published, including disciplinary decisions of the KPC and the Competent Authority.³¹ Nevertheless, transparency remains limited in relation to all requirements envisaged under the Action Plan. Meanwhile, the guidelines on the use of social media and public communication by prosecution offices were not adopted during 2025, although according to the KPC they had been drafted and remained pending approval procedures.

With regard to strengthening professional capacities and discipline, the Justice Academy did not implement the planned management and leadership trainings for court presidents and chief prosecutors. According to the comments provided by the Justice Academy, the lack of trainers and professional capacities affected the non-implementation of these activities, while discussions were

²⁸ For the purposes of this report, only activities planned for 2025 are subject to assessment, and any actions undertaken during 2026 will not be addressed in this report.

²⁹ IKD conducted meetings with the respective institutions, and the findings presented in this report are based on the data obtained during those meetings.

³⁰ Bashkim Hyseni and Ivana Milenković Elected Members of the Kosovo Judicial Council, Election for One Additional Position Fails. [Betimi për Drejtësi](#) (last accessed on 10 May 2026).

³¹ Materials related to the responsibility, discipline, and accountability of state prosecutors, including various decisions concerning the disciplining of prosecutors. [Prosecutorial System of Kosovo](#) (last accessed on 10 May 2026).

held with international partners regarding the standardization of such trainings in the future. As for the trainings intended for chief prosecutors, the activity was assessed as partially implemented, considering that similar trainings had been conducted in previous years.

In terms of procedural efficiency, the KJC prepared a report concerning the productivity of court hearings and continued promoting successful judicial cases through public communication platforms. However, activities related to the establishment of mechanisms for the early screening of cases and the strengthening of measures addressing failed court hearings were not fully implemented. Regarding the activity related to fines and measures imposed on parties for absence from hearings, the KJC stated that the reports contain data on such measures; however, detailed statistics are lacking, for which reason the activity was assessed as partially implemented.

Furthermore, full coordination between the KJC and the Official Gazette Office regarding the translation of judicial acts was not achieved. The Office of the Prime Minister stated that meetings, trainings, and coordination workshops with courts were conducted during 2025, while the KJC assessed that the activity had still not reached full implementation. For this reason, the activity was considered partially implemented.

Conclusion: Progress under this objective was limited and largely formal in nature. The majority of activities requiring legal reforms, institutional coordination, transparency, and concrete measures aimed at increasing procedural efficiency were not implemented within the prescribed deadlines, while a number of activities were only partially developed or remained at the stage of drafting and institutional discussions.

Specific Objective 2: Recruitment, Performance Evaluation, Integrity Control, Advancement, Status, and Professional Development of Judges and Prosecutors

For 2025, a total of 22 activities were planned under Specific Objective 2 of the Rule of Law Strategy. Based on IKD's monitoring and publicly available data, 7 activities were fully implemented, 2 were partially implemented, while 13 activities were not implemented at all, meaning that more than 59% of the planned activities were not carried out during 2025.

Progress under this objective remained limited, and the majority of activities were not implemented within the prescribed deadlines. Nevertheless, concrete developments were identified in several activities, particularly in the areas of human resource planning, training, and the development of electronic training platforms.

From a legislative perspective, the draft law on the recruitment, performance evaluation, integrity control, and status of judges and prosecutors, as well as the draft law on the Justice Academy, were not adopted during 2025. According to information obtained through meetings conducted by IKD with the responsible institutions, these draft laws had been prepared since 2024 and were submitted

to the Venice Commission for opinion in December 2024. Following the receipt of the Venice Commission opinions, the Ministry of Justice only initiated the process of reviewing these laws during 2026. Meanwhile, the Law on the Kosovo Prosecutorial Council (KPC) was adopted and entered into force during 2025, addressing the objectives for which its amendment and supplementation had been initiated, particularly regarding the criteria for the selection of members.

In terms of human resource planning and the recruitment of prosecutors and support staff, the KPC prepared planning documents concerning the recruitment and professional development needs of prosecutors and support staff, including personnel planning and training programs for 2026. However, activities related to the reform of the recruitment and advancement system, including legislative amendments and the establishment of complaint mechanisms before the Supreme Court for candidates, were not finalized during 2025, although the respective draft laws had been prepared and had entered the public consultation phase. Their non-adoption was also linked to the non-functioning of the Government and the Assembly during 2025.

With regard to professional development, the Justice Academy implemented a considerable portion of the planned activities. Initial and continuous training programs for professional associates and legal officers were reviewed, while specialized trainings for judges in areas identified through performance evaluations were also conducted. In addition, the use of electronic training platforms was expanded through the HELP platform and online training modules.

In terms of integrity and gender equality, the gender dimension was incorporated into trainings on anti-discrimination and trainings related to protection from domestic violence and violence against women. Nevertheless, the joint interinstitutional roundtable on addressing gender-based cybercrime was not organized.

Regarding financial resources, the increase in the budget of the Justice Academy was minimal and did not meet the envisaged objective of strengthening training capacities. The budget of the Justice Academy increased by only EUR 1,728 compared to the previous year, which does not reflect an institutional priority in this field.

Furthermore, the Institutional Integrity Plan was not approved during 2025, although interinstitutional coordination related to verification activities was reported.

Conclusion: Progress under this objective was partial. Although concrete developments were identified in the areas of training, planning, and electronic platforms, the majority of key activities related to legislative reform, recruitment, advancement, and institutional integrity mechanisms were not implemented within the prescribed deadlines.

Strategic Objective 2: Strengthening the Criminal Justice System

Specific Objective 1: Functioning of the Kosovo Police

During 2025, four activities were planned, of which two were fully implemented, while two were not implemented at all.

Progress under this objective was partial. In terms of strengthening integrity and professional ethics, the Kosovo Police and the Kosovo Academy for Public Safety implemented ethics trainings for police officers and supervisors. The trainings were conducted through the programs of the Kosovo Academy for Public Safety and covered topics related to police ethics, the Code of Ethics, and professional dilemmas in the exercise of official duties.

However, joint interinstitutional roundtables between the police, prosecution, and judiciary aimed at improving investigations in domestic violence cases and the initiation of cases by the Directorate for Internal Investigation were not organized. Likewise, the methodology for internal control and the initiation of cases by the Directorate for Internal Investigation was not drafted.

Conclusion: Limited progress was recorded under this objective, primarily in the areas of training and strengthening professional capacities, whereas activities related to interinstitutional coordination and internal control mechanisms were not implemented during 2025.

Specific Objective 2: Functioning of the Prosecution and Courts in the Handling of Criminal Cases

During 2025, nine activities were planned, of which only two were fully implemented, two were partially implemented, while five were not implemented at all, representing approximately 56% of the activities envisaged under the Action Plan.

Progress under this objective remained limited, with the majority of activities either unimplemented or only partially implemented. From a normative perspective, several instructions and regulations related to the functioning of the prosecutorial system were adopted, including administrative instructions and regulations on the internal organization of the KPC. Nevertheless, a number of legal and procedural activities were not finalized during 2025.

With regard to institutional coordination and the handling of criminal cases, the envisaged working groups for the investigation and coordination of cases among institutions were not established, while concrete developments in the operationalization of cooperation mechanisms between the prosecution and the courts were lacking.

In terms of strengthening professional capacities, the Justice Academy conducted specialized trainings for judges and prosecutors in the fields of financial investigation, confiscation, and

combating organized crime. In addition, certain reports related to the analysis of criminal cases and the functioning of the prosecutorial system were prepared.

However, amendments related to the Criminal Code and the Criminal Procedure Code were not adopted, while several actions remained only at the drafting or consultation stage without producing concrete results in practice.

Conclusion: Progress under this objective was partial and limited. Although several activities were implemented in the normative sphere and in professional trainings, the majority of activities related to institutional coordination, investigative mechanisms, and criminal procedural reform were not implemented during 2025.

Specific Objective 3: Functioning of Juvenile Justice

During 2025, twelve activities were planned, of which three were fully implemented, four were partially implemented, while five were not implemented at all, representing approximately 42% of the activities envisaged under the Action Plan.

Progress under this objective was partial, with limited developments mainly in the areas of reporting, training, and institutional coordination, while a considerable number of activities were not implemented during 2025.

With regard to the treatment of juveniles in conflict with the law, partial developments were identified concerning diversion measures. The Office of the Chief State Prosecutor did not issue specific guidelines for the imposition of such measures; however, it supported non-governmental organizations and UNICEF in drafting standard operating procedures and forms for the imposition of diversion measures. In addition, reporting mechanisms of chief prosecutors included data on the number of diversion measures imposed.

In relation to institutional coordination, several meetings were held between the prosecution, courts, probation service, and other local mechanisms dealing with juvenile cases, although such meetings were not conducted on a regular basis. Furthermore, the process of unifying judicial practice regarding educational measures remained ongoing.

In terms of strengthening professional capacities, the Justice Academy conducted trainings for judges concerning the handling of civil cases related to children's rights, including domestic violence, family relations with an international element, and the protection of children's rights. Meanwhile, only partial developments were identified in relation to trainings for lawyers.

Nevertheless, a considerable number of activities were not implemented during 2025. The envisaged studies and reports concerning criminogenic factors affecting children and the Child Protection Program for children below the age of criminal responsibility were not prepared.

Likewise, trainings for social workers were not organized, and no developments were identified regarding the prioritization of child justice in institutional plans.

Conclusion: Progress under this objective was partial. Although several activities were implemented in the areas of training, reporting, and institutional coordination, the majority of strategic activities related to the development of policies, analyses, and sustainable mechanisms for juvenile justice were not implemented during 2025.

Specific Objective 4: Execution of Criminal Sanctions

During 2025, a total of 27 activities were planned, of which 9 were fully implemented, 7 were partially implemented, while 11 were not implemented at all, representing approximately 41% of the activities envisaged under the Action Plan. Of the activities not implemented during 2025, some continued to be addressed during 2026 through the drafting of documents and the development of preparatory activities.

Progress under this objective was partial, with more visible developments in the areas of training, rehabilitation programs, individual sentence planning, and interinstitutional cooperation between the Kosovo Correctional Service (KCS), the Kosovo Probation Service (KPS), the Forensic Psychiatry Institute of Kosovo (FPIK), and the Prison Health Department. During 2025, joint trainings and workshops were organized with the support of the Council of Europe and EULEX, rehabilitation activities and vocational training programs for convicted persons were conducted, and a draft guideline for monitoring the implementation of the individual sentence plan was prepared. Nevertheless, a number of strategic activities remained unimplemented.

From a normative and organizational perspective, the Regulation on the Structure and Organization of the Kosovo Correctional Service was adopted, while steps were also undertaken to review professional training curricula for correctional officers. In addition, new rehabilitation programs were approved for preparation for release and for the treatment of cases involving violent extremism and radicalization, while the finalization of the program for the treatment of drug addiction was also initiated.

With regard to the development of professional capacities, a number of interinstitutional trainings were conducted for correctional and healthcare personnel, including trainings on the documentation of ill-treatment in accordance with the Istanbul Protocol³², the treatment of transgender persons deprived of liberty, and interinstitutional cooperation in the treatment and rehabilitation of convicted persons. Furthermore, activities related to dynamic security and the use

³² The Istanbul Protocol is the universally recognized United Nations manual on the effective investigation and documentation of torture and other forms of cruel, inhuman, or degrading treatment or punishment. For more, see: <https://www.ohchr.org/en/publications/policy-and-methodological-publications/istanbul-protocol-manual-effective-0>

of risk assessment instruments for probation clients were developed, although some of these activities remained only partially implemented.

In terms of infrastructure and technological capacities, investments in technological and logistical equipment for the Kosovo Correctional Service and the Kosovo Probation Service were identified, while the existing electronic monitoring mechanisms were also operationalized. Furthermore, interinstitutional cooperation agreements were concluded regarding the use of videoconference rooms and access to data concerning prisoners.

Nevertheless, a considerable number of activities were not implemented during 2025. Annual data concerning electronic monitoring were not published, the mechanism for psychological support and healthcare for prison personnel was not established, and strategic analyses and plans concerning the expansion of alternative measures and the management of workload within the Kosovo Probation Service were not finalized. In addition, the legal status of the Forensic Psychiatry Institute was not formalized.

With regard to the treatment and rehabilitation of convicted persons, the Kosovo Correctional Service conducted informational sessions and rehabilitation activities with convicted persons, recording an increase in their participation in rehabilitation programs, vocational training, and work engagement.

Conclusion: Progress under this objective was partial. Although concrete developments were achieved in the normative, rehabilitative, technological, and professional capacity-building aspects, a considerable number of strategic activities related to institutional planning, psychological support, strategic analyses, and monitoring mechanisms remained unimplemented during 2025.

Specific Objective 5: Seizure and Confiscation

During 2025, eight activities were planned, none of which were fully implemented during the reporting year, while only one activity was partially implemented, representing approximately 88% of activities remaining unimplemented during the reporting period.

Progress under this objective was very limited. The majority of activities related to legal and institutional reform concerning the seizure and confiscation of assets were not implemented during 2025, primarily due to the non-functioning of the Assembly and the Government.

From a normative perspective, the Ministry of Justice failed to proceed with and adopt the envisaged legal amendments concerning asset confiscation, including amendments to legislation governing the distribution of revenues derived from confiscation and the review of the competencies of the Agency for the Administration of Seized or Confiscated Assets (AASCA).

Nevertheless, preparatory activities were carried out during 2025 and the respective legislative drafts were prepared.

Furthermore, the Law on the State Bureau for the Confiscation of Unjustifiable Assets was not adopted during 2025. During 2026, the draft law advanced to the stage of first reading approval in the Assembly and proceeded through consultation and review procedures. Consequently, the establishment of the Bureau, the appointment of its Director, and the adoption of secondary legislation were not completed during 2025.

In terms of capacity-building, the Justice Academy partially implemented trainings for judges and prosecutors in the field of asset confiscation and seizure, whereas other activities related to institutional operationalization and confiscation mechanisms remained unimplemented.

Conclusion: Progress under this objective was very limited. Although procedural and legal developments concerning the Bureau for the Confiscation of Unjustifiable Assets and the amendment of the relevant legislation were identified during 2025 and 2026, the majority of key activities remained unimplemented and without concrete results in the operationalization of seizure and confiscation mechanisms.

Strategic Objective 3: Strengthening the Civil and Administrative Justice System

Specific Objective 1: Functioning of Civil Justice and Property Rights

During 2025, seventeen activities were planned, of which two were fully implemented, one was partially implemented, while fourteen activities were not implemented during the year, representing approximately 82% of the activities envisaged under the Action Plan.

Progress under this objective was insufficient, with the majority of activities remaining unimplemented during 2025. A considerable portion of legal reforms remained at the drafting or procedural stage and were not adopted due to the non-functioning of the Government and the Assembly during 2025.

From a normative perspective, the Civil Code and the Code of Civil Procedure had been finalized and submitted for Government approval since the end of 2024; however, they were not reviewed for adoption during 2025. Consequently, the envisaged amendments aimed at increasing efficiency in handling civil disputes, using electronic communication, conducting remote hearings, resolving cases through model decisions, and limiting the remanding of cases for retrial were not implemented.

Likewise, the Law on Construction Land was not adopted, and amendments to the legislation on mediation were not finalized, including provisions concerning the powers and responsibilities of

mediators and mandatory continuous professional training for them. Nevertheless, the initial draft amendments to the Law on Mediation were prepared.

In terms of strengthening professional capacities, the Justice Academy partially implemented trainings for judges, mediators, and support staff concerning mediation and civil procedures. Trainings were organized on the referral of cases to mediation, mandatory mediation in family cases, and enforcement procedures. Furthermore, the Free Legal Aid Agency participated in trainings organized by the Justice Academy in the civil, criminal, and administrative fields.

On the other hand, the signing of the memorandum between the Kosovo Judicial Council and the Chamber of Private Enforcement Agents concerning the facilitation of electronic communication in enforcement procedures was identified as an implemented activity, although its practical implementation had not yet commenced by May 2026 due to technical and organizational issues.

Conclusion: Progress under this objective was limited. Although developments were identified in the areas of training and electronic communication in enforcement procedures, the majority of key activities related to civil legislative reform, property rights, and mediation were not implemented during 2025.

Specific Objective 2: Functioning of Commercial Justice

During 2025, thirteen activities were planned, of which six were fully implemented, one was partially implemented, while six were not implemented during the year, representing approximately 46% of the activities envisaged under the Action Plan.

Progress under this objective was partial, with more visible developments in strengthening professional capacities and trainings for judges, professional associates, and support staff of the Commercial Court, whereas activities related to the unification of judicial practice and standardization of procedures largely remained unimplemented.

In terms of professional development, the Justice Academy conducted a considerable number of trainings in the commercial field during 2025. A total of thirteen trainings addressing legislation and judicial practice in commercial matters were held, attended by judges, professional associates, and legal officers of the Commercial Court. Furthermore, the training curricula for newly appointed judges and professional associates had already been prepared and operationalized without requiring additional revision.

On the other hand, the Kosovo Judicial Council and the Commercial Court did not prepare summaries of judicial practice, standard decision templates, or case management manuals for the support staff of the Commercial Court. These activities, aimed at unifying practice and procedural standardization, remained unimplemented during 2025.

Regarding monitoring and evaluation of the functioning of the Commercial Court, the activity concerning the implementation of business perception surveys was only partially implemented.

With regard to alternative dispute resolution mechanisms, the Ministry of Justice did not organize interinstitutional roundtables for the promotion of arbitration and did not provide public data concerning the organization of trainings for mediators in the commercial field. Meanwhile, the Kosovo Bar Association conducted trainings for lawyers regarding arbitration procedures.

Conclusion: Progress under this objective was partial. Although concrete developments were achieved in trainings and professional capacity-building within the Commercial Court, activities related to the unification of judicial practice, procedural standardization, and institutional promotion of arbitration largely remained unimplemented during 2025.

Specific Objective 3: Functioning of Administrative Justice

During 2025, fourteen activities were planned, of which nine were fully implemented, four were partially implemented, while one was not implemented during the year, representing approximately 7% of the activities envisaged under the Action Plan. A portion of the activities planned for 2025 continued to be implemented during 2026.

Progress under this objective was notable, particularly in terms of operationalizing the Administrative Court, organizing trainings, and strengthening institutional mechanisms in the administrative field.

From a normative and institutional perspective, the Law on the Administrative Court had been adopted by the Assembly in December 2024; however, its entry into force and the full operationalization of the Administrative Court were postponed until 2026 due to constitutional review proceedings before the Constitutional Court. Following the Constitutional Court judgment of January 2026, the law entered into force on 22 January 2026, while the Administrative Court commenced operations on 5 May 2026. During this period, concrete steps were undertaken towards its operationalization, including the appointment of the Acting President and the Court Administrator.

Regarding human capacities, the process of filling positions for judges, professional associates, and support staff remained ongoing throughout 2025 and 2026. Vacancies were announced, and part of the recruitment procedures continued during 2026.

In terms of procedural functioning, the Administrative Court commenced implementation of written proceedings in accordance with the Law on Administrative Conflicts. Furthermore, a mechanism was established for monitoring court cases related to state liability through institutional reporting and existing monitoring mechanisms.

In terms of professional development, the Justice Academy conducted trainings for judges, professional associates, and Free Legal Aid Agency officials concerning administrative legislation and administrative disputes. During 2025, seven trainings in the administrative field were conducted, and training modules for this field were also prepared. Furthermore, the Kosovo Bar Association conducted trainings for lawyers concerning the Law on Administrative Conflicts.

Regarding the State Advocacy Office, the Regulation on Internal Organization remained in the process of finalization, while during 2025 three state advocates were recruited. Nevertheless, for some activities related to the monitoring by the Ministry of Finance of authorities generating the highest costs from court cases, sufficient public data were lacking to assess the full level of implementation.

Conclusion: Progress under this objective was considerable, with concrete developments in the operationalization of the Administrative Court, organization of trainings, and strengthening of institutional mechanisms. Nevertheless, certain activities related to the full recruitment of staff and the finalization of internal organizational acts continued during 2026.

Strategic Objective 4: Digitalization of Justice

During 2025, seventeen activities were planned, of which nine were fully implemented, three were partially implemented, while five were not implemented during the year, representing approximately 29% of the activities envisaged under the Action Plan.

Progress under this objective was partial, with more visible developments in the creation and advancement of electronic systems, improvement of IT infrastructure, and operationalization of digital services in several justice sector institutions. In this regard, electronic systems for online applications for liberal legal professions became operational, with the exception of applications for the judicial experts examination, which was later transferred under the authority of the Ministry of Justice.

In terms of electronic systems and databases, concrete developments were achieved within the Kosovo Probation Service, the Agency for the Administration of Seized or Confiscated Assets, and the Ministry of Justice, including the development of online application systems for legal professions, expansion of databases, and advancement of systems related to domestic violence cases. Furthermore, the electronic auction system advanced to its final phase of evaluation and staff training during 2025.

In terms of digital infrastructure and information security, the Data Center at the Palace of Justice was upgraded during 2025 through the procurement of servers, routers, and licenses, while a project for expanding capacities for the period 2026–2027 was also prepared. In addition, all Basic Prosecution Offices were equipped with functional videoconferencing equipment.

Regarding professional capacities and institutional coordination, steps were undertaken to organize professional trainings for IT staff and plans were drafted concerning the financing of digitalization within the justice sector. Nevertheless, several activities remained only partially implemented due to lack of budget and the suspension of certain projects. Furthermore, the Governing Council for Information Technology within the justice sector has not yet been established, nor have international certification standards for IT staff been introduced.

On the other hand, several activities remained unimplemented, including the development of the access module for the Free Legal Aid Agency through the e-Kosova platform and the drafting of legal provisions concerning the digital signature of notarial acts. In addition, the electronic HelpDesk system within the KPC remained under implementation and is expected to become operational during 2026.

Conclusion: Progress under this objective was partial. Although concrete developments were achieved in advancing electronic systems, digital infrastructure, and IT services within the justice sector, a number of strategic activities related to institutional coordination, standardization, and the full operationalization of digital systems remained unimplemented or only partially implemented during 2025.

Specific Objective 1: Access to Courts and Prosecution Offices and Legal Remedies

During 2025, 8 activities were planned, of which 6 were fully implemented, while 2 were not implemented during this year, representing approximately 25% of the activities envisaged under the Action Plan.

Progress under this objective was partial, with more visible developments in terms of institutional cooperation, the provision of free legal aid, and the advancement of the legal framework for the protection of victims and access to justice.

From a normative perspective, the Ministry of Justice drafted the Draft Law on Trial within a Reasonable Time, which passed public consultation procedures and was forwarded for approval to the Government during 2025. Likewise, amendments to the Criminal Procedure Code related to access to court against prosecutorial decisions were drafted.

From an institutional perspective, the Free Legal Aid Agency established partnerships and cooperation agreements with non-governmental organizations for the provision of free legal aid, while the Kosovo Bar Association continued the implementation of the rule on the provision of pro bono cases by lawyers.

With regard to strengthening professional capacities, trainings were conducted for officials of the Free Legal Aid Agency regarding procedures for access to justice and the protection of citizens'

rights.³³ Likewise, curricula were drafted and trainings were organized regarding the Law on the Protection of Victims of Crime.

Nevertheless, a number of activities remained unimplemented during 2025. The Office for Victim Protection and Assistance was not equipped with the necessary means for confidential communication, while for some activities related to the advancement of institutional mechanisms, sufficient public data are lacking to assess the full level of implementation.

Conclusion: Progress under this objective was partial, with concrete developments in terms of institutional cooperation, free legal aid, and the advancement of the legal framework. Nevertheless, several activities related to strengthening institutional mechanisms and technical support for the protection of victims remained unimplemented during 2025.

Specific Objective 2: Functioning of Liberal Professions

During 2025, 36 monitoring activities were planned. Of these activities, 16 were fully implemented, 1 was partially implemented, while 19 were not implemented during 2025, representing approximately 53% of the activities envisaged under the Action Plan. A number of activities were implemented only during 2026.

Progress under this objective was partial and uneven, with visible differences among the various liberal professions. From a normative perspective, the Law on Advocacy and the Law on Mediation were not adopted during 2025, while the Law on Private Enforcement Agents remained part of the treatment within the Code of Civil Procedure. Likewise, several secondary acts and coordinating mechanisms related to the functioning of liberal professions were not adopted.

In terms of institutional development and the operationalization of systems, several concrete developments were identified. According to officials of the Chamber of Private Enforcement Agents, the EMS system was not operationalized, although trainings for its use were conducted. Furthermore, the Chamber of Bankruptcy Administrators was provided with office premises and steps were undertaken towards its operationalization.

With regard to professional development and trainings, a considerable number of activities were implemented by professional chambers and responsible institutions. Trainings were held for judges regarding bankruptcy procedures, trainings for bankruptcy administrators, initial and continuous trainings for private enforcement agents, as well as trainings for mediators. Furthermore, training programs were drafted and implemented for employees of notaries and private enforcement agents,

³³ Annual Work Report, Free Legal Aid Agency (FLAA), 2025. <https://anjf.rks-gov.net/desk/inc/media/C1CF4A2D-2D60-4F59-BCE4-1D70C1C22858.pdf> (last accessed on 10 May 2026).

while the Justice Academy created the curriculum for joint thematic trainings among liberal professions, judges, and prosecutors.

On the other hand, a considerable number of activities remained unimplemented. Interinstitutional coordinating mechanisms between liberal professions and justice institutions were not established, the planned awareness-raising activities concerning bankruptcy and mediation procedures were not developed, and several envisaged curricula and programs for training and monitoring were not created. Likewise, public data are lacking for several activities related to transparency and the institutional organization of the Chamber of Bankruptcy Administrators.

Regarding ethics and internal professional organization, the Code of Ethics for Bankruptcy Administrators, the Statute of the Chamber of Private Enforcement Agents, and the new Code of Ethics for Private Enforcement Agents were adopted. Meanwhile, the revision of the Statute of the Chamber of Private Enforcement Agents was completed only during 2026.

Conclusion: Progress under this objective was partial. Although concrete developments were identified in the operationalization of certain systems, the organization of trainings, and the advancement of professional and ethical acts, a considerable number of legal reforms, coordinating mechanisms, and institutional activities remained unimplemented during 2025.

Specific Objective 3: Cooperation with Civil Society and the Public and Policy Development by the Ministry of Justice

During 2025, 11 monitoring activities were planned, excluding the repeated activity related to the adoption of the Public Communication Strategy. Of these activities, 4 were fully implemented, 1 was partially implemented, while 6 were not implemented during the year, representing approximately 55% of the activities envisaged under the Action Plan.

Progress under this objective was partial, with more visible developments in terms of public communication, awareness-raising activities, and coordination with donors, while a number of activities related to structured dialogue with civil society and the measurement of public perception remained unimplemented.

In terms of institutional communication, the Kosovo Police adopted the Public Communication Strategy in accordance with the Law on Access to Public Documents, while the Ministry of Justice failed to prepare the report on the implementation of the Public Communication Strategy and also failed to conduct the initial survey for measuring public knowledge and satisfaction with the services provided. Nevertheless, the Ministry of Justice published annual reports on its work and the results of the work of the Ministry of Justice, including communication with the public and activities in this field.

With regard to cooperation with civil society and the public, the planned activities for raising citizens' awareness on active participation in legislative processes and justice reforms were not implemented. Likewise, regular and structured dialogue between institutions and civil society organizations was not conducted in a sustainable manner during 2025. According to data from the Ministry of Justice, during 2025 a total of 43 requests for public consultation were published, of which 10 received comments, while one request was rejected.

On the other hand, the Ministry of Justice implemented awareness-raising activities within the framework of the "16 Days of Activism" campaign against domestic violence and gender-based violence, in cooperation with civil society organizations and other relevant actors. Furthermore, coordination meetings with donors were held for the implementation of joint projects and staff within the Office for Public Communication were partially recruited. Likewise, the Ministry of Justice announced that, within the framework of drafting the Communication Strategy 2023–2025 and the drafting of the new Strategy, consultations and discussions were organized with institutional partners and civil society organizations.

In terms of capacity-building, officials of the Office for Public Communication attended trainings related to strategic communication, while other training activities concerning partnerships, legal analysis, and advocacy strategies were not implemented during 2025.

Conclusion: Progress under this objective was partial. Although developments were identified in terms of public communication, awareness-raising activities, public consultations, and coordination with donors, the majority of activities related to structured dialogue with civil society, the measurement of public perception, and the systematic development of policies remained unimplemented during 2025.

11. Compliance of the Legislative Program with the Action Plan

During 2025, due to the institutional crisis and the lack of full constitution of the Assembly and the Government, no draft laws related to the Rule of Law Strategy were approved by the Government and no laws were adopted by the Assembly. As a result, a large number of activities envisaged in the 2025 Action Plan remained unimplemented and were postponed to 2026.

Following the constitution of the Assembly and the formation of the Government on 11 February 2026, the Government approved the Legislative Program for 2026 on 20 February 2026.³⁴ Due to

³⁴ Government Draft Legislative Program for 2026–2028, Government of the Republic of Kosovo, Prishtina 2026. <https://kryeministri.rks-gov.net/wp-content/uploads/2026/02/Programi-i-Projekligjeve-per-vitet-2026-2028.pdf> (last accessed on 10.05.2026).

the delays from the previous year, the 2026 Legislative Program was required to largely reflect the draft laws envisaged in the Action Plan of the Rule of Law Strategy for 2025–2026.

The analysis of the Legislative Program for 2026 shows that a considerable number of draft laws envisaged in the Action Plan of the Strategy were also included in the Government’s legislative agenda. This includes the Draft Law on Amending and Supplementing the Law on the KPC, the Draft Law on Amending and Supplementing the Law on the KJC, the Draft Law on the Disciplinary Responsibility of Judges and Prosecutors, the Draft Law on Courts, the Draft Law on Amending and Supplementing the Criminal Procedure Code, the Draft Law on the Administration of Seized and Confiscated Assets, the Draft Law on the State Bureau for the Confiscation of Unjustifiable Assets, the Civil Code, the Code of Civil Procedure, the Draft Law on Mediation, the Draft Law on Free Legal Aid, the Draft Law on the Realization of the Right to Trial within a Reasonable Time, and the Draft Law on Advocacy.

This shows that, in general, there is a considerable level of harmonization between the Rule of Law Strategy and the Legislative Program for 2026. In this regard, the inclusion of the majority of draft laws envisaged in the Action Plan within the Legislative Program constitutes a positive development, reflecting an effort to pursue the reform agenda in the justice sector.

Category	Number
Draft Laws envisaged in the RoL Strategy/Action Plan 2025-2026	15
Included in the 2026 Legislative Program	13
Missing from the 2026 Legislative Program	2

Table 2. Compliance of the 2026 Legislative Program with the Draft Laws envisaged in the RoL Strategy/Action Plan 2025–2026

Nevertheless, the Legislative Program for 2026 does not include all draft laws envisaged in the Strategy. Two important draft laws that are missing are the Draft Law on Construction Land and the Draft Law on Private Enforcement Agents. The absence of these draft laws shows that the harmonization between the Strategy and the Legislative Program is not complete and that certain important reforms in the field of property and private enforcement risk being further postponed.

Missing Draft Laws from the 2026 Legislative Program
1. Draft Law on Construction Land
2. Draft Law on Private Enforcement Agents

Table 3. Draft Laws Missing from the 2026 Legislative Program Compared to the RoL Strategy/Action Plan 2025–2026

In addition to the inclusion of draft laws in the Legislative Program, some of them have already entered the public consultation phase on the Online Platform for Public Consultations. These include the Draft Law on Amending and Supplementing the Law on the KJC, the Draft Law on Amending and Supplementing the Law on the KPC, the Draft Law on Amending and Supplementing the Law on the Justice Academy, the Draft Law on the Disciplinary Responsibility of Judges and Prosecutors, as well as the Draft Law on the Recruitment, Performance Evaluation, Integrity Control, and Status of Judges and Prosecutors. The drafting process of this legislative package began following the adoption of the Justice Reform Laws, and during 2024–2025 the draft laws were also submitted to the Venice Commission for opinion. This shows that, at least for a portion of the priority reforms, the concrete process of drafting and proceeding with the legislation has already begun.

In conclusion, the Legislative Program for 2026 is largely harmonized with the activities of the Rule of Law Strategy and the 2025–2026 Action Plan. Nevertheless, the absence of several important draft laws and the experience of previous years show that their inclusion in the program alone is not sufficient.

12. What Was Intended vs. What Was Achieved through the Rule of Law Strategy

The Rule of Law Strategy (RoLS) 2021–2026 was drafted as the main reform document for the justice sector in Kosovo, with the aim of addressing long-standing problems in the functioning of the judiciary, prosecution, the fight against corruption, and access to justice. The Strategy was based on the Functional Review of the Rule of Law Sector, which identified the main deficiencies in the administration of justice, lack of efficiency, lack of accountability, problems with institutional integrity, and the limited access of citizens to justice.

The RoLS aimed to restore citizens' trust in the judicial and prosecutorial system through deep reforms in four main areas: the functioning of the judiciary and prosecution, criminal justice, access to justice, and anti-corruption. In practical terms, the Strategy aimed to reduce the number of unresolved cases, increase the professionalism of judges and prosecutors, improve the performance evaluation system, strengthen institutional integrity, advance the fight against corruption and organized crime, and improve citizens' access to courts, prosecution offices, and effective legal remedies.

One of the main objectives of the RoLS was to ensure that reforms would not remain only at the level of documents, but would be translated into concrete legal and institutional changes. For this reason, the Strategy and the Action Plan envisaged a large number of activities, ranging from the adoption of draft laws and new standards to the establishment of new institutional mechanisms, the strengthening of professional capacities, and the improvement of interinstitutional coordination.

Nevertheless, the implementation of the RoLS has failed to produce the intended results to the envisaged extent. Although in some cases concrete steps have been undertaken, such as the drafting of draft laws, the adoption of certain standards, or the establishment of certain mechanisms, many activities have remained only at the planning stage, public consultations stage, or have been partially implemented. In many cases, institutions have focused more on drafting documents than on their practical implementation.

The biggest problems were identified in relation to the lack of institutional coordination, lack of monitoring, delays in the adoption of draft laws, and the lack of an adequate budget. Despite the fact that the RoLS was adopted by the Government itself, many envisaged activities were not reflected in budget planning and were not accompanied by sufficient financial resources for implementation. This caused many objectives to remain only declarative.

A continuing problem was also the inconsistency between what was envisaged in the Strategy and what institutions undertook in practice. IKD identified cases where the draft laws or reforms undertaken were not in line with the findings and recommendations of the Functional Review of the Rule of Law Sector. This was particularly observed in the reform of the Kosovo Prosecutorial Council, the amendments to the Criminal Procedure Code, and issues related to access to court against prosecutorial decisions.

Likewise, institutional reporting on the implementation of the RoLS often did not reflect the real situation on the ground. In official reports, activities were identified as completed or partially completed even in cases where they had not started at all or had not produced concrete results. This created an artificial perception of greater progress than what actually existed.

During 2022 and 2023, IKD identified that a considerable number of planned activities were not implemented within the prescribed deadlines. Dozens of activities planned for 2022 remained unimplemented even during 2023, while many others remained under the status of “partially implemented” without any real progress. Moreover, a number of activities that did not require major financial or institutional obstacles remained unimplemented.

Another important problem was the fact that the initial Action Plan expired at the end of 2023, while the mid-term review of the Strategy and the adoption of the new Action Plan were not carried out within the deadlines envisaged by the Strategy itself. This created a period during which the Strategy remained in force, but without a concrete implementation action plan. In practice, this paralyzed the implementation of the RoLS for a considerable period of time.

The mid-term review of the Strategy and the 2025–2026 Action Plan aimed to correct some of the shortcomings of the first phase of implementation by including new activities and reformulating priorities. Nevertheless, the revised documents retained similar problems, especially in relation to the lack of a clear budget assessment. On the other hand, the review process relied on analyses and

policy documents drafted by interinstitutional working groups, which addressed priority areas of justice reform and served as the basis for drafting the 2025–2026 Action Plan.

If the RoLS had been fully implemented, the justice system in Kosovo should have been more efficient, more transparent, more professional, and more accessible to citizens. There should have been fewer unresolved cases, more effective legal remedies, greater institutional integrity, more results in the fight against corruption, and greater citizens' trust in justice. Nevertheless, by the end of the implementation period, it remains clear that many of the main objectives of the RoLS have not been fully achieved and that the rule of law sector continues to face many of the problems that the Strategy aimed to address.

13. Lack of Monitoring of the Rule of Law Strategy

Following the constitution of the Assembly³⁵ and the formation of the Government³⁶ on 11 February 2026, it was expected that the institutional monitoring of the Rule of Law Strategy and the 2025–2026 Action Plan would also resume. Nevertheless, by the end of April 2026, no meeting of the Steering Committee of the Strategy appears to have been held, even though this mechanism is responsible for the coordination, monitoring, and reporting on the implementation of the envisaged activities.

Likewise, during 2025, the publication of the six-month report on the implementation of the Rule of Law Strategy, as required by the Strategy itself, was not identified. During this period, no public communication by the Ministry of Justice regarding the progress of the Strategy was identified, whether through the publication of reports, announcements on coordination meetings, new priorities, or delays in implementation.

Furthermore, the Committee on Legislation, Mandates, Immunities, the Rules of Procedure of the Assembly, and the Oversight of the Anti-Corruption Agency did not carry out any specific activity related to the oversight of the implementation of the Strategy. This shows that, even after the establishment of the new institutions, the Rule of Law Strategy has still not returned as a clear political and institutional priority.

Following the constitution of the new institutions, the Government and the Assembly should have treated the Rule of Law Strategy as one of the main priorities of the mandate. Given that the year 2025 was almost entirely lost due to the institutional crisis, the period after 11 February 2026

³⁵ The X Legislature of the Assembly of the Republic of Kosovo Was Constituted, Assembly of the Republic of Kosovo, Prishtina 2026. <https://www.kuvendikosoves.org/shq/punesimi/per-publikun/lajmi/u-konstituua-legjislatura-x-e-kuvendit-te-rep-36955/>. (last accessed on 14.04.2026).

³⁶ The Assembly Elected the New Government of Kosovo with Albin Kurti as Prime Minister, Assembly of the Republic of Kosovo, Prishtina 2026. <https://www.kuvendikosoves.org/shq/punesimi/per-publikun/lajmi/kuvendi-zgjedhi-qeverine-e-re-te-kosoves-me-k-36958/>. (last accessed on 14.04.2026).

should have been used to recover the delays, through the immediate activation of monitoring mechanisms and the proceeding of priority reforms.

The Steering Committee should have convened immediately after the formation of the institutions, with the aim of assessing the activities not implemented during 2025, identifying obstacles, and setting new deadlines for their implementation.

Likewise, the Steering Committee, as it has usually done on the website of the Ministry of Justice, should have published periodic reports, announcements on the progress of activities, and information on draft laws under procedure. Public reporting would help increase transparency, facilitate monitoring by civil society, and increase institutional pressure for the implementation of the envisaged reforms.

14. How the Government Should Approach the Rule of Law after the End of the Strategy

The Rule of Law Strategy 2021–2026 has entered its final phase. According to the deadlines set out in the Strategy itself, during 2026 its final evaluation should be carried out, following the mid-term review conducted in 2024. This evaluation should serve not only to measure the level of implementation of activities, but also to identify the structural weaknesses that hindered its implementation throughout the 2021–2026 period.

The Government should not approach the conclusion of the Strategy merely as the formal closure of a policy document. On the contrary, 2026 should be used to conduct an in-depth assessment of the reforms that have functioned, those that have failed, and the concrete reasons why a large number of activities were not implemented. In this process, not only the results of justice institutions should be analyzed, but also political obstacles, lack of coordination, lack of capacities, and especially lack of financing.

One of the main lessons from the implementation of the 2021–2026 Strategy is that rule of law reforms cannot rely only on long lists of activities and objectives. The experience of recent years has shown that many activities remained unimplemented due to lack of prioritization, lack of budget, and lack of interinstitutional coordination. Furthermore, the effective implementation of rule of law reforms remains closely linked to the existence of sustainable political will. In this context, the formation of the new government after the 7 June elections represents a key moment for the reactivation of the reform agenda and for addressing the delays accumulated during the period of institutional crisis.

Following the completion of the current Strategy, the Government should seriously consider the need for a new rule of law strategy. However, before adopting a new document, a proper review of the existing institutions and mechanisms should be conducted. It should be assessed whether the current structure of the Steering Committee, the coordinating body, and the secretariat has

functioned in practice, whether institutions have had sufficient capacities, and whether the method of reporting and monitoring has been effective.

A new strategy should not merely be a continuation of the existing document with new activities. It should be built upon a clear analysis of the problems that hindered the implementation of the current Strategy. This means that, before its drafting, a broad consultation process should be conducted with justice institutions, civil society, professional chambers, the academic community, and international partners.

Likewise, one of the key elements of the new approach should be realistic financial planning. The future strategy should from the outset be accompanied by a full cost assessment, concrete financing sources, and its integration into medium-term budgetary documents. Otherwise, there is a risk that the same problems that characterized the 2021–2026 Strategy will be repeated, where many activities were planned without real financial support.

The Government should also focus more on concrete results and not only on the number of implemented activities. For example, greater importance should be placed on whether the efficiency of courts has increased, whether access to justice has improved, whether the number of unresolved cases has decreased, whether anti-corruption mechanisms have been strengthened, and whether citizens have greater trust in justice institutions.

Another important element is the need for better interinstitutional coordination. The experience so far has shown that many activities depend on cooperation between the Ministry of Justice, the Assembly, the KJC, the KPC, the Ministry of Finance, and other institutions. In the absence of such coordination, reforms risk remaining fragmented and unimplemented.

Finally, after the completion of the current Strategy, the Government should move from the formal approach of drafting documents toward a more functional and measurable approach to the rule of law. The mere adoption of strategies and action plans is not sufficient. What matters is whether these documents produce concrete changes in the functioning of the justice system and in the lives of citizens.

15. Recommendations

- The responsible institutions should prioritize the implementation of Rule of Law Strategy activities that do not require legislative amendments and approval by the Assembly of Kosovo, with a focus on administrative measures, secondary legislation, capacity-building, digitalization, and institutional coordination mechanisms, with the aim of minimizing the impact of political blockages on the implementation of reforms.
- Interinstitutional coordination between the Ministry of Justice, the Kosovo Judicial Council, the Kosovo Prosecutorial Council, and other responsible institutions should be

strengthened through regular mechanisms for planning, reporting, and monitoring progress for each planned action.

- Permanent coordination mechanisms should be established to ensure the continuity of reforms in the justice sector during periods of political crises or institutional transition, with the aim of preventing interruptions in the implementation of reforms.
- Following the elections of 7 June 2026 and the constitution of the new institutions, the Government and responsible institutions should draft an accelerated implementation plan for the completion of activities remaining from 2025 and those planned for 2026, by defining concrete deadlines and institutional responsibilities.
- During the process of reviewing budget allocations, the Government should ensure adequate allocation of financial resources for the implementation of Strategy activities, particularly for actions that currently do not have defined costs or identified financing sources.
- The Government should initiate the process of the final evaluation of the implementation of the Rule of Law Strategy 2021–2026, by analyzing the level of implementation, structural obstacles, the real impact of reforms, and the lessons learned, as a basis for drafting the new Rule of Law Strategy 2027–2032.
- During 2026, the Government should initiate the drafting process of the new Rule of Law Strategy 2027–2032, with the aim that the new Strategy and the respective Action Plan are adopted before the beginning of 2027, enabling the commencement of the implementation of reforms from the very beginning of the strategic period. The drafting process should be based on a comprehensive assessment of the implementation of the 2021–2026 Strategy and should be carried out in close cooperation with the relevant institutions of the justice sector, including the Kosovo Judicial Council, the Kosovo Prosecutorial Council, international partners, and civil society, with the aim of ensuring the real priorities of the sector, institutional coordination, and harmonization with European standards.

