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CONTRIBUTION OF PARTNER COUNTRIES TO THE EU YOUTH WIKI CHAPTER III: ALBANIA Employment and entrepreneurship

**Author: Lutjona Lula
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3.1 General context

The labour market situation in the country

In recent years, Albania has experienced substantial changes in both employment and entrepreneurship, including among young people. Labour market data suggest that the economic growth in Albania during the period 2019-2022 has translated into significant improvements in the labour market. In the past Albania experienced high employment rates due to multiple factors such as undeveloped private and service sectors, unqualified workers and informal working. According to the Institute of Statistics of the Republic of Albania, [INSTAT](#), the level of unemployment in the country as of June 2023 was 10.9%; this rate had been steadily declining compared to the previous year.

Historically, a sizeable portion of employment has been in the public sector. Nonetheless, steps have been taken by the government to encourage employment in the private sector and shrink the size of the public administration. The draft of the [National Strategy for Employment and Skills 2023-2030](#) and its [predecessor for 2019-2022](#) focus on encouraging the expansion of the private sector, which includes small and medium-sized businesses (SMEs), tourism and agriculture.

The informal economy employs a sizeable section of the labour force in Albania, owing to the fact that most people work in agriculture and especially in jobs with low productivity and wages, while production and services still remain below their maximum potential (INSTAT 2023).

In the fast-paced digitalised environment in the region and in all EU countries, Albania has been attempting to create an atmosphere that is more favourable for start-ups and entrepreneurship. In recent years, Tirana, the country's capital, has seen a rise in the number of co-working spaces, incubators and accelerators. For many entrepreneurs, access to funding is challenging. The government has been working to lower bureaucratic barriers for business owners and simplify its business legislation. Most new business owners are young entrepreneurs operating in the fields of digital marketing and software developments.

Despite the rise of new career paths and business ventures in the Albanian labour market, the country, still relies heavily on agriculture and hospitality and tourism as its main labour markets.

Main concepts

1. **Economic Recovery:** Albania's economy demonstrated resilience and entrepreneurship during the recent crises. The economy recovered strongly in 2021 with a GDP growth of

7.2%. In 2022, growth reached 4.8% as private consumption, exports and investment increased despite rising energy and food prices (World Bank Country Overview 2022).

2. **Employment:** Poverty is expected to continue to decline as employment and wages rise (ibid.).
3. **Entrepreneurship:** There is little entrepreneurship activity happening in the regions, with most efforts focusing on livelihood creation and small-scale traditional entrepreneurship in sectors such as tourism, agriculture and handicrafts (Hach and Trenkmann 2019).
4. **Education and Skills:** Albania has made some progress in education, particularly with the adoption of the new [National Strategy for Education and Action Plan 2021-2026](#) (European Commission 2022).

The above-mentioned points provide the main definitions and overview on the common understanding of the employment and entrepreneurship situation in Albania.

3.2 Administration and governance

Governance

The governance approach to youth employment and entrepreneurship in Albania is characterised by cross-sectoral co-operation between various ministries, departments and state or non-state agencies.

One of the significant reforms that the Albanian government embarked on in 2021 is the Youth Guarantee. This initiative aims to address high levels of youth unemployment and inactivity and facilitate a smoother school-to-work transition (Jorgoni 2021).

The Employment Promotion Law of 2019 introduced the concept of the Youth Guarantee into Albanian legislation, paving the way for the design and implementation of the Youth Guarantee Implementation Plan. On 6 October 2020, the European Commission announced an Economic and Investment Plan for the Western Balkans, in which the Youth Guarantee scheme features as a flagship initiative (Jorgoni 2021).

In addition to the government, non-governmental organisations also play a crucial role in addressing youth employment and entrepreneurship. For instance, [Save the Children in Albania](#) focuses its work on capacity building and strengthening of services for children and the creation of a policy and legislative environment which can respond to key child rights issues in the country.

1. [The National Agency for Employment and Skills \(NAES\)](#): The mission of the NAES is to develop and support the Albanian workforce through the provision of intermediation,

vocational education, training, vocational guidance and employment services. It also [provides](#) financial and career support to unemployed jobseekers. The NAES was formed as a result of the transformation of the National Employment Service.

2. [The National Agency for Vocational Education, Training and Qualifications \(NAVETQ\)](#) is a public entity in Albania that operates under the ministry responsible for vocational education and training, currently the Ministry of Finance and Economy.

The mission of NAVETQ is to create a unified national system of vocational qualifications based on the Albanian Qualification Framework (AQF), which aligns with the European Qualification Framework (EQF).

NAVETQ is in charge of developing the National List of Occupations based on ISCO 2008, providing market needs assessment for qualifications, developing occupation and qualification standards and developing national curricula for long-term and short-term training courses.

Additionally, NAVETQ is responsible for developing teaching materials and assessment instruments, continuing professional development of teaching staff in the VET system and developing mechanisms for the inclusion of lifelong qualifications in AQF levels.

NAVETQ also accredits VET providers and assessment centres for recognition of prior learning for levels 2-5 of the AQF, co-ordinates the activity of the sectoral committees and monitors and supports VET providers in the implementation of the self-assessment process.

In terms of youth employment, NAVETQ plays a crucial role in equipping the young workforce with the right skills and qualifications, thus facilitating their transition into the labour market and contributing to economic growth, employment generation and social stability.

3. [The State Minister for Entrepreneurship in Albania](#) is a ministerial post within the Albanian Government. The main competences of the minister include the following.
 - **Communication with entrepreneurs:** the Minister of State for Entrepreneurs is responsible for communicating with entrepreneurs in the business community.¹ This involves understanding the needs and challenges of entrepreneurs and facilitating dialogue between them and the government.
 - **Protection of civil and commercial rights:** the minister provides advice on the protection of civil and commercial rights.
 - **Intellectual property rights:** the minister is also responsible for advising on registration and protection of intellectual property rights.

- **Organisation of informative activities:** the minister organises informative activities between interested start-ups and other services.
4. [The Ministry of Finance and Economy](#) in Albania is responsible for matters relating to economic policy, the central government budget, taxes, banking, security and insurance, international economic work and central, regional and local government.

In terms of employment, the Ministry of Finance and Economy plays a crucial role in shaping the macroeconomic and fiscal policies that influence the labour market. It is responsible for revenue management, administration of the state budget, public debt management, financial management and managing European Union financial assistance and funds. These responsibilities indirectly impact employment by influencing the overall economic environment within which businesses operate. For instance, sound fiscal policies and efficient budget management can create a stable economic environment that is conducive to business growth and job creation.

Moreover, the Ministry of Finance and Economy was restructured in 2017 by incorporating the Department of the Economy, which was part of the Ministry of Economic Development, Tourism, Trade and Enterprise. This restructuring has further expanded the ministry's role in promoting economic development and employment.

It is important to note that while the Ministry of Finance and Economy plays a significant role in shaping the economic environment, other ministries and agencies also contribute to employment policies and programmes in Albania.

These bodies work together to create an environment that promotes youth employment and entrepreneurship, providing the necessary support and resources to help young people transition into the workforce. Their responsibilities range from policy making and legislation to the implementation of specific programmes and initiatives aimed at equipping young people with the necessary skills and opportunities for employment and entrepreneurship.

Cross-sectoral co-operation

Albania has concluded its [National Strategy for Employment and Skills for 2019-2022](#) and has finalised the drafting and approval process for the new [strategy for 2023-2030](#). The previous strategy was based on the following four main pillars:

1. promoting opportunities for decent work through effective labour market policies;
2. providing quality vocational education and training for young people and adults;
3. promoting social inclusion and territorial cohesion;

4. strengthening labour market governance and qualification systems.

This strategy aimed at the integration of economic, educational, training and policies into a comprehensive framework, producing an action plan that aimed to increase the level of employment, making a gradual transition from passive unemployment policies to active policies to stimulate employment and placing emphasis on the development of the workforce in the country.

In the current strategy, the tasks and responsibilities for improving employment, including among young people, are shared between the [Ministry of Finance and Economy](#)¹, [Ministry of Education and Sports, State Minister for Youth and Children](#) and the [Ministry of Health and Social Protection](#).

3.3 Skills forecasting

Forecasting system(s)

Skills forecasting in Albania is a crucial aspect of the country's employment strategy. It involves anticipating future labour market needs and aligning education and training systems to meet these needs (Bakule et al. 2016).

The [European Training Foundation \(ETF\)](#), in collaboration with the [International Labour Organization \(ILO\)](#) and the [European Centre for the Development of Vocational Training \(Cedefop\)](#), has developed a guide on skills anticipation and matching, which includes the development of skills foresight, scenarios and skills forecasts. This guide aims to support the establishment of skills forecasting systems at the national level through quantitative and/or qualitative approaches.

Nevertheless, in Albania there is no skills forecasting system. Many international development projects and organisations are working to improve the situation.

The [Institute for Democracy and Mediation](#) has also conducted a sector-based analysis of the vocational skills development system in Albania. The report highlights the role of the European integration agenda in driving Albania's vocational skills development (IDM Albania 2016).

¹ Important note: This chapter has been written in 2023. In January 2024, the Government of Albania has been restructured. The Ministry of Finance and Economy has been split into two separate Ministries: 1- Ministry of Finance and 2- Ministry of Economy, Entrepreneurship and Culture. All functions of youth employment, vocational education and entrepreneurship covered in this chapter, fall under this Ministry.

In 2018, the World Bank conducted an analysis of the “Skills Towards Employment and Productivity Survey in Albania”. The report highlights the need for actual skills, rather than education levels, diplomas or years of schooling as proxies for skills.

However, most recent studies highlight the importance of technical skills in priority areas, such as the energy sector, where there is high demand for energy-related expertise and consultants to contribute to strategic decision making, the diffusion of new technologies and investment in renewable energies. This poses a complex skills challenge in Albania, leading many firms to outsource to international expertise (European Training Foundation 2022).

Nevertheless, the need for a skills forecasting mechanism is high in order to address the labour market mismatch in Albania between demand and supply. Following the public event of RisiAlbania project on 12th December 2023, International Labour Organization National Coordinator in Albania, Ms. Zhulieta Harasani, stated during her speech that ILO has started initial steps towards supporting the Government of Albania in building a skills forecast system.²

Skills development

One of the most important aspects of workforce development and economic growth in the labour market is skills development. Because of changes in the country such as technological improvements and new industrial demands, there is a constant need to adapt and acquire new skills that are relevant for the demands of the labour market. Due to the variety of competences required by the labour market, people need to develop different vital skills such as fundamental, transferable, technical and vocational skills.

Skills development in Albania is organised through a comprehensive approach that involves various stakeholders and formal mechanisms. The key actors involved in this process include the Ministry of Finance and Economy, NAES and NAVETQ. These entities work together to deliver co-ordinated and demand-driven services.

The [Albanian Qualifications Framework \(AQF\)](#) is a comprehensive eight-level structure that corresponds to the [European Qualifications Framework \(EQF\)](#) and recognises three types of qualifications: vocational/professional qualifications (AQF levels 2-5; 7-8); general/traditional qualifications offered at universities, general high schools and elementary schools (AQF levels 1; 4; 6-8), lifelong learning qualifications (AQF levels 1; 5; 7; 8). The AQF is integral to meeting the country’s employment and skills needs, and so is a principal instrument for contributing to the objectives specified in the National Employment and Skills Strategy (NESS) for 2014-2021 and

² For more please see here: <https://www.risialbania.al/shifting-the-employment-paradigm-fostering-decent-jobs-in-albania/?lang=en>

its successor for 2019-2022. NAVETQ has a mission to create a unified national system of vocational qualifications based on the Albanian Qualification Framework (AQF), which leans on the European Qualification Framework (EQF). NAVETQ provides expertise in issues of vocational education and training (VET) development and lifelong learning. It is responsible for developing the National List of Occupations based on ISCO 2008, assessing market needs for qualifications, developing occupation and qualification standards, and creating national curricula for long-term and short-term training courses.

Additionally, NAVETQ develops teaching materials, assessment instruments and mechanisms for the inclusion of lifelong qualifications in AQF levels. It also accredits VET providers and assessment centres for the recognition of prior learning for levels 2-5 of the AQF. NAVETQ coordinates the activity of the sectoral committees and monitors and supports VET providers in the implementation of the self-assessment process. In the AQF, there are three main categories: general and higher education qualifications; professional or VET qualifications; and lifelong learning qualifications catering to adults and people undertaking specialised courses for professional development. This shows how NAVETQ supports skills development and lifelong learning in Albania.

In September 2013, the Ministry of Education, Sports and Youth undertook a reform of the curriculum in pre-university education. The curricular reform is based on the training of students for life and for lifelong learning, in accordance with recommendations from the parliament and from the Council of Europe on basic competences for lifelong learning. These components collectively contribute to the organisation of skills development in Albania, helping to align the skills of the workforce with the needs of the economy and promote employment (Albanian Strategy of Education 2021-2026: 45). In June 2019, the Council of Ministers adopted [Decision No. 427](#) on the inclusion of lifelong learning qualifications in the Albanian Qualifications Framework (AQF). However, according to the latest comparative data set from the European Training Foundation, in 2022 only 0.7% of the population in Albania aged 25-64 had participated in training related to knowledge updates (Euronews 2023).

3.4 Career guidance and counselling

Career guidance and counselling services

Career guidance services in Albania are provided by various bodies and are governed by several legal frameworks. Albania has been working to enhance its career guidance and counselling services to fully understand the crucial role that it plays in assisting people to make informed decisions about their professional career. Career guidance counsellors or advisers are available in many secondary schools and universities in Albania.

Based on [Law 80/2015](#) on Higher Education, career development was highlighted. They assist students in exploring career alternatives, selecting suitable educational pathways and making well-informed decisions about their future. They offer details on various career paths, opportunities for education and training, and developments in the labour market. State career guidance is also offered at Employment Offices, which cater mostly to people who require vocational short-term training; in most cases these people do not have a secondary education or are not in education, employment or training (NEET). The government has put more effort and investment into vocational training in recent years to educate people on a variety of specialised skills.

Some local municipalities are building capacities in the area of career guidance as part of their employment promotion policy and offering this service to the community, as a public good. The first local office offering career counselling services to the community was established in 2021 in the [Municipality of Tirana](#). The municipalities of Berat, Lushnje and Elbasan are taking steps to establish such centres, with the support of [RisiAlbania](#), a project of the [Swiss Agency for Development and Cooperation](#). The [EU for Municipalities](#) programme in Albania has supported the southern [Municipality of Përmet](#) to establish a careers office. The [US Embassy in Albania](#) has also supported the establishment of [careers offices in the Mat Municipality](#) and [Kukës](#), in northern Albania.

Funding

Data on the exact amount of career financing that comes from the state budget are not available. Funded career guidance and counselling services are also provided by programmes such as [RisiAlbania](#), which specifically works with young people to offer more work opportunities in a sustainable and comprehensive way.

3.5 Traineeships and apprenticeships

Official guidelines on traineeships and apprenticeships

The official guidelines on traineeships and apprenticeships in the country are regulated by [Law no. 15/2017, "On Vocational Education and Training"](#) . The law aims to regulate aspects of the vocational education and training (VET) system in accordance with the general education system and the labour market. Law no.15/2017 also establishes the obligation to provide career orientation and links with the labour market.

The VET system is based on the following basic principles.

- a) Inclusiveness: the VET system offers opportunities for education and training for all professionals, without any discrimination.
- b) Autonomy: the VET system operates based on autonomous VET providers financially and in governance.
- c) Quality: the VET system ensures quality and approved standards in accordance with international standards for the recognition of qualifications and learning results.
- d) Co-operation: the VET system works based on co-operation with various public and non-public entities and with social partners, who are involved at all levels of the VET system.
- e) Guaranteeing participation: the VET system creates the financial, social and physical conditions for individuals to take advantage of lifelong learning opportunities.
- f) Mobility and continuity: the VET system guarantees compliance with curricula of general education subjects that are included in its profiles. It offers opportunities for all students to transfer to other education or training programmes and/or to continue to acquire knowledge, competences and skills, in accordance with labour market requirements.
- g) Diversity: the VET system offers various types and levels of qualifications, adapted to different groups, recognising their existing level of knowledge.

The [Skills for Jobs \(S4J\)](#) programme in Albania has developed an apprenticeship system that meets the requirements of the private sector. The development and implementation of the apprenticeship system started in 2016, initially in one vocational school and in one sector, but has since grown to six vocational schools where 1 138 apprentices were hosted by 436 companies in five regions and in nine sectors during the 2018-2019 academic year. This apprenticeship system is designed to make graduates more employable. The programme has also developed an appropriate monitoring system and assesses the impact of this intervention.

Quality assurance is viewed in terms of the accreditation of VET providers. Accreditation is an external quality evaluation process that determines whether a provider and programmes/vocational qualifications meet the standards set by law. The accreditation process presumes the existence of an internal quality assurance system, such as self-assessment. However, this system is still under construction and has not yet been put into effect. The new accreditation system includes a school self-assessment, which was piloted in 2018 and implemented systematically in 2019. The Law on Vocational Education and Training and the Law

on the Albanian Qualifications Framework lay the foundation for developing an accreditation model for the Albanian VET system and serve as the legal basis for the quality assurance system. NAVETQ is in charge of managing the accreditation system for VET providers (ETF 2020).

3.6 Integration of young people into the labour market

Albania is considered a young country even though recent changes have affected its population. [The youth population in Albania is in decline](#) in recent years as a result of many young people opting to study and work outside the country. Nonetheless the work force in the country is still mainly young.

There is a lack of private-sector jobs, especially for young people. Many young university graduates face a difficult transition into the labour market, being incentivised to migrate abroad (Xhumari et al. 2016). For example, many health workers, including doctors and nurses, migrate to Germany and other EU member states, even immediately after finishing their education (Druga 2020).

Through a number of different strategies, the government aims to overcome the obstacles that young people encounter when they enter the workforce. Policies aim to lower youth unemployment rates, increase youth employment and enhance young people's prospects for overall financial success. The Albanian government has made it easier for companies to hire young people by offering incentives and subsidies. Employers may find it more appealing to hire and keep young people when these incentives help to defray some of the associated costs (Regional Cooperation Council 2020).

The [Skills Development for Employment \(SD4E\)](#) programme is another initiative that aims to boost the (self) employment of young women and men living in urban and rural areas.

3.7 Cross-border mobility in employment, entrepreneurship and vocational opportunities

Albanian cross-border mobility programmes and schemes can offer invaluable chances for young people to travel abroad, hone their talents and promote cross-cultural understanding.

The [Erasmus+](#) programme facilitates mobility for vocational education and training, even though its main focus is on higher education exchanges. Albanian workers and students can get real-world experience and skills by taking part in work placements, internships and vocational training programmes in other European nations.

[Erasmus for Young Entrepreneurs](#) is another vital programme that Albanian citizens can benefit from.

[European Solidarity Corps](#) – This programme provides apprenticeships and work placements in addition to volunteering opportunities. Young Albanians can improve their employability and skills by participating in projects or working in a variety of professions throughout Europe.

[The Regional Youth Cooperation Office \(RYCO\)](#) – RISE (Regional Incubator for Social Entrepreneurs) is the new name for RYCO's project WB6 Lab. The objective of the project is to address a specific and crucial need in the region in relation to its current context and history: opening new spaces of reconciliation for young people in the Western Balkans through social entrepreneurship. The project, due to its very regional nature, expects to increase the number of cross-border interactions around social entrepreneurship during the three years of the project and thereafter.

Vocational training facilities – Albania has schools and facilities for vocational training that work with foreign partners, such as European organisations. These collaborations can help international apprenticeship and vocational training initiatives.

Cross-border job opportunities – Albanian workers may be able to find jobs in several bordering regions, particularly in industries like construction, agriculture and tourism. In addition to learning about work permits and visa procedures, young Albanians should investigate job opportunities in these areas.

Youth entrepreneurship programmes – Albanian start-up accelerators and incubators, for example, may have collaborations and international ties. Programmes that provide networking, investment possibilities and mentorship overseas are available to young entrepreneurs.

EU financial aid and grants – Small enterprises and entrepreneurs in Albania have access to a range of EU financial programmes and grants that can help with market expansion, co-operation and cross-border activities.

Albania has bilateral agreements with a number of nations, some of which may include clauses pertaining to employment and vocational training. Young people are welcome to investigate these agreements and the possibilities they present.

Chambers of Commerce and Business Associations – With their global reach, these establishments can assist aspiring entrepreneurs and job seekers to explore opportunities and find out about collaborations across international borders.

International Job Fairs and Conferences – Young Albanians can network with prospective employers, partners and investors from other nations by attending international job fairs, conferences and trade events.

3.8 Development of entrepreneurship competence

Policy framework

Albania has been making strides in the development of entrepreneurship competence in formal education. The National Employment and Skills Strategy 2019-2022 has focused on improving the quality and relevance of education and training. The strategy emphasises the need to harness non-state actors in reaching out and delivering skills (OECD 2022). Moreover, much remains to be done to substantially promote adult learning and the new [National Strategy for Skills and Employment 2023-2030](#), emphasises the need to harness non-state actors in reaching out and delivering skills (ETF, 2023)

Moreover, the Albanian referencing report to the European Qualification Framework (EQF) was approved, making it possible for Albanian learners and professionals to easily compare their qualifications with the rest of the EU, an important milestone in the development of skills in the country.

However,).

These efforts aim to equip the country's young workforce with the right skills to serve this strategic vision. They are designed to improve the effectiveness and efficiency of the labour inspection system as well as to ensure the protection of the rights and interests of the workers and employers (ibid.).

Formal learning

Entrepreneurship education is a recent field in Albania and is being developed to enhance students' entrepreneurial attitudes and skills. The goal is to support students to develop an independent and versatile approach by growing the spirit of entrepreneurship.

Albania has adopted some European policies and frameworks regarding entrepreneurship education, such as the European Entrepreneurship Competence Framework ([EntreComp](#)), which defines 15 competences that make up the entrepreneurial mindset and behaviour.

However, Albania still faces some challenges to developing and implementing entrepreneurship education, such as improving the quality and attractiveness of vocational education and training, increasing the participation of adults in formal and non-formal education, enhancing the digital skills of students and teachers and strengthening the collaboration between education and the private sector.

Non-formal and informal learning

Non-formal education can play an important role in developing entrepreneurial competences, as it can provide flexible, learner-centred and experiential learning opportunities that complement formal education. Non-formal education can also target specific groups, such as social entrepreneurs, women, young people and minority groups, and address their needs and challenges.

Educators support in entrepreneurship education

Albania has developed [Law No. 25/2022 for “The support and development of start-ups”](#), which aims to draft a favourable regulatory and institutional framework for the creation and development of start-ups and the support of their ecosystem, for the promotion of research and for the realisation and use of innovative ideas, as well as new models, products and processes, which encourage innovation in every field of economic development.

3.9 Start-up funding for young entrepreneurs

As already stated above, as a developing country, Albania hosts many international organisations that aim to support the government and the market to improve youth employment and youth entrepreneurship. Some of the most prominent are as follows.

[EU for Innovation](#) – This is an initiative that aims to support the development of innovative businesses in Albania and offers a range of services, including training, mentoring and funding opportunities for young entrepreneurs. The website provides information about programmes, events and success stories.

[Regional Start-up Ecosystem Development](#) – This page provides information on the regional start-up ecosystem development programme, which is designed to support the development of start-ups in the Western Balkans. The programme offers training, mentoring and networking opportunities for young entrepreneurs, as well as access to funding and other resources.

[Albanian American Development Foundation](#) – This foundation provides support for young entrepreneurs in Albania through a range of programmes, including business incubation, mentoring and access to funding. The website provides information on their programmes, success stories and other resources for young entrepreneurs.

[GIZ](#) – This is a German development agency that provides support for young entrepreneurs in Albania and other countries. The website provides information on programmes, success stories and other resources for young entrepreneurs.

[Partners Albania](#) – This is a non-profit organisation that provides support for social innovation and entrepreneurship in Albania. The website provides information on programmes, success stories and other resources for young entrepreneurs.

3.10 Promotion of entrepreneurship culture

See section 3.9

3.11 Current debates and reforms

Forthcoming policy developments

Albania is developing new strategies for skills development. [Strategjia Kombëtare e Punësimit dhe Aftësive 2023-2030 \(konsultimipublik.gov.al\)](#) is a document that outlines the vision, objectives and actions of the Albanian government to improve the quality and quantity of employment and skills in the country. It is based on a comprehensive analysis of the current situation and the future challenges and opportunities.

Ongoing debates

There are several ongoing debates in Albania regarding youth employment. The Albanian government announced the [Youth Guarantee](#) as a significant reform to address high levels of youth unemployment and inactivity and to facilitate a smoother school-to-work transition. The piloting phase began in October 2023.

The lack of job opportunities in the private sector, especially for highly educated young people, the consequent migration of young people and subsequent difficulties in integrating returning migrants into the labour market are some of the issues being debated in Albania, accompanied by the widescale illegal and legal youth migration that persists as an issue.

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