

PILLAR I ALBANIAN LEGISLATION

Consumer Protection in Albania

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I. ABSTRACT

The concept of consumer protection is relatively new in Albania. The first consumer protection association¹ was established in 15 March 1990, on the international day of consumers' protection, in a time period coinciding with the start of political changes in Albania, but well before the institutionalisation of consumer protection policies. By signing the Stabilisation and Association Agreement in 2006², our country committed among other things, to harmonize the Albanian legislation with the *acquis communautaire*³ and to cooperate in harmonising Albanian consumer protection standards to the European ones. This article aims to provide an overview of the development and prospects of consumer protection policies in the Republic of Albania. More concretely, it will refer to the historic evolution of the concept of consumer protection after the 1990s; to the creation and formalisation of the consumer protection associations; codification of primary and secondary legislation in the area of consumer protection in the Republic of Albania; and to the interaction of other institutions, such as the competition authority and associations focusing on consumer protection.

KEY WORDS: Consumer policies, Consumer associations, Acquis Communitaire, Standards

ABBREVIATIONS

ACA Albanian Consumer's Association
ADR Alternative Dispute Resolution
CPC Consumers Protection Commission

CPS Consumer Protection Sector

EU European Union

GDMC General Directorate of Metrology and Calibration

GDS General Directorate of Standardization

ICPO International Consumer Protection Organisation

LCP Law no.9902, dated 17.4.2008 "On Consumer Protection" as amended MEDTTE Ministry of Economic Development, Tourism, Trade, and Entrepreneurship

MoH Ministry of Health

MTI Ministry of Transport and Infrastructure

¹ "Shoqata Kombetare e Konsumatorit"- National Consumers' Association

²www.europa.eu, Stabilisation and Association Agreement of the EU with the Western Balkans framework.

³ Acquis Communauitaire is the overall legislation, legal acts, and court decisions which constitute the body of European Union law.



National Consumer Association **NCA**

NFA National Food Authority

OCP Office for Consumers Protection

State Inspectorate of Market Supervision **SIMS**

II. MAIN DEVELOPMENT STAGES OF CONSUMER RIGHTS IN THE WORLD

"If on the one hand, the abundance of products reduces the need for regulatory activity, on the other it is precisely this abundance that encourages it. Before the invention of vehicles, concerns over vehicle safety did not exist, and there wasn't a need to set speeding limits in highways, to introduce urban traffic checks or to set our rules for driving under the influence..." Similarly, "modern communication has encouraged the need for a new regulatory system. Lastly, a urgent pressing need to protect the consumer from deceitful or evidently fraudulent messages has arisen⁴,...

The ancient origin of the consumer is found since the middle ages, in Thomas Aquinas, Martin Luther and John Calvin' criticism to the unfair trade practices of that era; becoming thus the first consumer advocates, a rather fashionable phenomenon of present days. Consumer protection, in the modern understanding, is a phenomenon of this century and the purpose of its affirmation is to strengthen the rights and power of the consumer towards the business world. From an institutional point of view, there are three ways to guarantee consumer protection: through government initiatives/policies, respective legal framework, and through fair competition and self-regulation mechanisms that market stakeholders undertake themselves⁵.

The first event marking the beginning of policies in favour of the consumer is the "Antitrust" Normative (Sherman Act) of 1890, which was not intended and designed to protect the consumer, but to protect small trade and craftsmanship from the superpower of monopolists and the concentration of large industries. The Sherman Act, in fact, excluded all activity that tended to get a profit out of a monopoly situation. The first part of the Sherman Act prohibited all practices that restricted competition conditions (such as price control), while the second banned companies that had monopoly on a market sector from extending this monopoly into other sectors⁶. The implementation of these policies allowed the consumer to choose from a wider range of products and enabled the creation of fair competition for artisans and small traders. These policies necessarily bring about the diversification of price policies which benefit the consumer directly.

On 15 March 1962, the US President John F. Kennedy stated "The definition of consumers includes us all. They are the largest economic group, which affects and is affected by virtually every public and private economic activity. However, they are the only important group whose

⁴John Keneth Galbraith "The affluent society", 1995.

⁵ Artan Xh. Duka "Consumers behaviour",1999.

⁶ "Consumer protection: history, instrumenets and application techniques. Selling of consumer goods", Riccardo di Martino, 2007.



voice is not heard often ... I announce four fundamental consumer rights: (i) the right to safety; (ii) the right to information; (iii) the right to choose; (iv) the right to be heard". The 15th of March has been proclaimed the World's Consumer Rights Day so as to commemorate this event. The day's main goal is to bring attention to consumer rights and to the relation between consumers and enterprises. With its fifty working years, ICPO's, has expanded basic consumer rights up to eight⁸. The European Commission also celebrates the 15th of March as European Consumer's Day as a way to discuss and promote opportunities offered to consumers by the EU integration.

Consumer protection is today, a global phenomenon. This is because in every country, the public now reacts in one way or another in order to protect its rights as buyers. For developed countries, consumer protection is a daily occurrence, while in developing countries it is often ignored or avoided. Developing countries should strive to adopt sustainable consumption patterns that will protect consumers, whilst ensuring respect to the principle of joint, but particular responsibility, in relation to the activity performed (producers, traders etc). In this context, when adopting consumer protection policies and legislation, developing countries should consider their own specific circumstances and needs. Also, when drafting policies on consumer protection, attention should be paid to the positive role of universities and think tanks, both public and private⁹.

The Franco-German Centre for Consumer Protection was established in 2003 as an EU project for the creation of the European Consumers Centre¹⁰. Consumers' protection, interest and safety are among EU's main objectives to ensure the improvement of the EU citizens' lives. After almost 20 years from the establishment of this Centre, it can be said that European consumers should be able to efficiently use their rights in a way that markets are at the service of the consumers and not the other way around. More specifically, markets should allow consumers to do good business¹¹. It is worth mentioning as a general principle that the EU's goal in relation to consumer protection is to further improve the implementation of legislation, and to strengthen the cooperation with national authorities as well as with stakeholders¹².

III. STAGES OF CONSUMER RIGHTS DEVELOPMENT IN ALBANIA

In Albania before the 1990s, the question of consumer rights was not raised at all and the concept was not recognized as a fundamental right of the individual. Once the political system changed in

http://www.cftc.mw/index.php/2013-12-16-09-56-37/press-releases/67-press-statement-world-consumer-rightsday-2014.html

⁸ (i) the right to satisfaction of basic needs, (ii) the right to safety, health and life, (iii) the right to be informed, (iv) the right to choose, (v) the right to be heard, (vi) the right to redress, (vii) the right to consumer education, (viii) the right to a healthy environment.

United Nations Guidelines for Consumer Protection (as expanded in 1999), 2003

¹⁰ 1993-2013 Europe for consumers – is it about you? 20th anniversary of the European Consumer Centres/ Strasburg, 2013.

^{11 1993-2013} Europe for consumers – is it about you? 20th anniversary of the European Consumer Centres/ Strasburg, 2013.

¹²1993-2013 Europe for consumers – is it about you? 20th anniversary of the European Consumer Centres/ Strasburg, 2013.



the 90s, the internal market was liberalized and free trade of products and services was introduced. Under these circumstances, the relationship between trader and consumer started, with the consumer being the vulnerable subject. As already mentioned above, on 15 March 1990, the first consumer protection association was founded. For many years the association has been conducting educational and informative activities on consumer rights and has been active in protecting the Albanian consumer. In 1991 Albania joined the ICPO. Over the years, new consumer protection associations have been established (such as ACA, CPO, and Consumers in Focus). Their activity has been carried out alongside the process of economic transition of the country. These associations, having spread throughout the country, have played a key role in informing and protecting all categories of consumers (urban and rural)¹³. The activity of these associations has been important since, for many years these associations have served as the only organizations protecting and educating consumers about their rights, until 2009 when a public institution for the protection of consumer rights was established. Consumer Protection Associations cooperate with the CPC to resolve consumer disputes through mediation or representation in courts. During these proceedings, the associations assist consumers with legal information and counselling and represent them in dispute settlement negotiations. Pursuant to the ACA's magazine, "Consumer's Voice", every year an average of fifteen thousand complaints are filed in courts by consumer protection associations. These associations have also carried out a series of promotional activities on consumer rights, such as school programmes, advertising campaigns, brochures, events and publications ¹⁴, surveys, blogs, etc.

It should be acknowledged that steps have been taken to modernize the Albanian legal framework on consumer protection oriented towards harmonization with the Acquis Communautaire. And yet, the Albanian consumer is still vulnerable in many respects. For instance the implementation of consumer protection legislation is still lagging behind. It is clear that the legal framework needs well-organized governmental and institutional policies for its implementation and translation into genuine commercial practices that have a real impact on consumer protection. Given that consumers play an important role in the functioning of the economy, the proper implementation of consumer rights becomes all the more important.

A governmental institutional system for consumer protection is currently in place, and is organized into three main units (i) the Consumer Protection Sector, part of the Internal Market Department within MEDTTE; (ii) the Consumer Protection Commission and (iii) the State Inspectorate for Market Supervision. In a country like Albania, which is characterized by a small market economy, the implementation of consumer protection policies is not similar to more developed countries. "Every government should define the basic principles for consumer protection, compliant with the economic, social and environmental conditions of the country and the requirements of the population"¹⁵, thus the Albanian government must adapt to the real

¹³ Consumers are categorised on the basis of demographics, household finances, time constraints etc. See Consumer policy Toolkit OECD 2013.

¹⁴"Consumer's Voice", ACA magazine published between 1991-2007.

¹⁵ United Nations Guidelines for Consumer Protection (as expanded in 1999), 2003.



market and economy conditions in order to draft consumer protection policies that are closer to the consumer and their needs. While Albanian lawmakers have been careful in determining consumer rights, however their enforcement in practice has been poor.

Also, it should be acknowledged that a new system has been proposed to resolve disputes in favour of the consumer, under the framework of alternative dispute resolution (ADR) schemes 16. This new legislative proposal aims to provide consumers with an alternative solution to the courtroom (court proceedings cost more and take longer time). Disputes between traders and consumers in many cases involve small amounts of money and are thus neglected by the consumers, given that resorting to courts or other institutions may take up a lot of time. The functioning of mediation practices will help to resolve these cases and will have an impact on better law enforcement by completing the institutional framework on consumer protection. Alternative Dispute Resolution is intended to ensure that ADR schemes are available in all sectors for all disputes between customers and traders. "These ADR schemes should respect certain principles, in line with the provisions of European legislation, such as: quality, transparency, impartiality and effectiveness. Consumers should be informed of the existence of an ADR scheme during purchase transactions" and this responsibility falls on the trader or service provider¹⁷.

IV. ANALYSIS OF THE ALBANIAN LEGAL FRAMEWORK

The effective enforcement of consumer protection rules is achieved mainly through the cooperation between the authorities and the relevant bodies, tasked with the implementation of consumer protection laws, with the information and education on consumer rights and dispute resolutions¹⁸. Since Albania's top national priority is EU accession, the country is engaged in an ambitious reform programme to align its legislation and institutions to that of the EU, thus fulfilling the accession criteria which require compliance with European standards (acquis communautaire). Consumer protection is a key element of the acquis and a criterion for adhering to the EU. The signing of the SAA between Albania and the EU in 2006 resulted in intensified efforts to introduce consumer protection policies in Albania. One year after, the Albanian government approved the first document on consumer protection, the Crosscutting strategy on consumer protection and market supervision 2007-2013¹⁹. This constituted a milestone towards the introduction of consumer protection policies and a number of measures were envisaged to adopt EU legislation and to adjust law enforcement institutions in Albania accordingly²⁰. The second strategic document adopted by Albania in this area is the Crosscutting Strategy on Consumer Protection and Market Supervision 2020²¹, approved by the Council of Ministers in

¹⁶ GIZ, Regulatory impact assessment Alternative Dispute Resolution with consumers, December 2015.

¹⁷ Crosscutting Strategy 2020, pg. 36.

www.euopa.eu Speech Relying on the Single Market for the future of Europe, Brussels, 28 February 2013.

https://shtetiweb.org/ëp-content/uploads/2014/05/strategjia per mbrotitjen e konsumatorit.pdf

http://kmk.ekonomia.gov.al, CPC website

²¹http://kmk.ekonomia.gov.al/ëp-content/uploads/2015/11/Strategjia-e-Mbrojtjes-se-Konsumatoreve-dhe-Mbik%C3%ABqyrjes-se-Tregut.pdf



September 2015²². "The strategy aims at drafting and implementing policies that create a comprehensive legal and institutional environment guaranteeing the protection of consumers health, safety and economic interests, improving education, information and awareness, and support for an effective implementation of their rights, so that consumers are empowered and more confident in purchasing goods and services in a market that works for them" ²³.

Aside from the crosscutting strategies mentioned above, which constitute the government's policies for consumer protection, there exists the legal framework on consumer protection that stipulates consumer's rights and market stakeholders' obligations on this subject. First of all, there are two sets of provisions in the Civil Code of the Republic of Albania²⁴ which regulate, on the one hand, the responsibility of the manufacturer (Articles 628-634) and, on the other, deceitful advertising (Articles 635-637). These provisions lay down the general civil liability of the manufacturer for defective products, as well as the civil liability of any person who, in the exercise of his/her commercial activity, issues misleading announcements regarding the nature, origin, size, prize etc. of the offered product.

Secondly, there exists the particular legislation on consumer protection, more specifically Law no. 9902, dated 17.04.2008 "On consumer protection", as amended"²⁵. This law includes all types of relations between traders and consumers that deal with consumer goods or services. In principle, the provisions of Law 9902 do not apply, when other legal provisions regulating particular areas, contain dispositions which are more favourable for the protection of consumers' rights. Law 9902 determines in detail the basic consumer rights, which are the following:

- i. the right to protection of health, environment and life safety;
- ii. the right to protection of economic interests;
- iii. the right to redress;
- iv. the right to compensation;
- v. the right to education;
- vi. the right to information;
- vii. the right to use public services;
- viii. the right to legal protection;
- ix. the right to organise in associations or unions for the protection of consumer rights;
- x. the right to representation in decision making bodies.

In addition to the specific consumer protection law, there is also Law no. 10480, dated 17.11. 2011 "On General Safety of Non-Food Products"²⁶, harmonised with EC Directive 2001/95 on

²⁴ Approved by law no.7850, 29.7.1994, amended by laws no. 8536/1999, law no.8781/2001 and law no.17/2012.

²² Council of Ministers Decision no. 753, date 16.09.2015 "On the approval of the crosscutting strategy on consumer protection and market supervision 2020"

²³ Crosscutting strategy 2020, pg. 33

²⁵ Amended by law no. 10444, on 14.07.2011 "On some amendments to law no. 9902, on 17.4.2008"; and by law no. 10444, on 14.07.2011 "On some amendments to law no. 9902, on 17.4.2008" and by law no. 15/2013 "on some amendments to law no. 9902, on 17.4.2008" On Consumer Protection", amended.

²⁶ This law constitutes the legal basis on market surveillance and on CMD that transfer the sectors' legislation from the Ministry of Economy to other relevant ministries.



General Product Safety. This law establishes the legal basis for market supervision. Both of the abovementioned laws are the primary norms for consumer protection policies. In addition, several sub-legal acts have been adopted for ensuring enforcement of these laws on the overall product safety²⁷.

Another area important to consumers is the field of production of food products. Food safety is regulated by specific legislation and supervised by specific bodies. The legislative framework on food safety is comprised of Law no. 9863, dated 28.1.2008 "On Food", harmonized with the acquis communautaire. The law aims to reduce, eliminate or prevent risks to consumer health through three basic measures: risk assessment; risk management and risk communication in the field of food and feedstuff, protection of plants and agricultural inputs, etc. The institution responsible for overseeing food safety in Albania is the NFA²⁸.

There are other laws and by-laws of a variety of sectors that incorporate provisions aiming at protecting the consumers from traders' arbitrary behaviour such as:

- Law no. 68, dated 21.06.2012 "On information on power consumption and other resources of products impacting energy";
- Law no.9918, date 19.5.2008 "On electronic communications in the Republic of Albania", ii. amended;
- Law no.97/2013 "On audiovisual media in the Republic of Albania": iii.
- Instruction of the MTI issued in 2011 approving the regulation "On the responsibility of air carriers in relation to aerial transport of passengers and their luggage".

As already mentioned above, the Albanian consumer enjoys the right to safe products that do not harm their health, life and environment. In this context, manufacturers are obliged to offer only safe products on the market. In addition to the legal provisions on general safety of non-food products, the 2013 Crosscutting Strategy stipulates the link with Rapid Alert System for Dangerous Non-Food Products (RAPEX) and the creation of structures at governmental or nongovernmental level.

V. THE INSTITUTIONAL FRAMEWORK AND THE IMPLEMENTATION OF **CONSUMER RIGHTS IN ALBANIA**

The institutional structure on consumer protection in Albania is comprised of three units, which have a joint mission but function in a decentralised manner. Their activity is coordinated pursuant to the law on Consumer Protection. The responsible institutions for consumer protection in Albania are as follows:

The structure responsible for consumer protection within MEDTTE is the Consumer Protection Sector within the Directorate of Internal Market. This structure is

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²⁷ CMD no. 263, date 3.4.2013 "On defining child-resistant lighters, and imitating, attractive to children lighter models", completely transposes the EC directive 2006/502/EC dated 11 May 2006.

CMD no. 441, date 22.5.2013 "On dangerous imitations", fully transposes EC directive 87/357/EEC.

http://aku.gov.al/



responsible for drafting policies and legislation on consumer protection issues, and for defining regulatory instruments that guarantee the implementation of said policies and legislation.

- The Consumer Protection Commission which started operating since May 2009. This ii. institution is comprised of 5 members and carries out a monitoring role regarding the implementation of consumer protection policies and is the main body responsible for the implementation of consumer protection legislation. The CPC is a decision-making body with powers to take administrative measures in case consumer protection legislation is violated.
- The State Inspectorate for Market Supervision²⁹ has the mission to guarantee products iii. safety for consumers, through supervision activities of products placed on the market, pursuant to the relevant legislation in force. SIMS is also responsible for monitoring the implementation of intellectual property rights.

During its work, CPC has looked into violations of legislative provisions on consumer protection in relation to matters such as: unfair commercial practices; misleading publicity; unfair terms in standard customer contracts; the billing and invoice delivery of customers of fix phone lines; VAT exclusion on service delivery prices; unfair terms in bank loan contracts; customer complaints against electricity, water and telecommunications service providers; discrepancies between the service provided and terms of contracts in private universities, etc³⁰. CPC is also responsible for consumer education and raising awareness on topics such as: (i) consumer rights; (ii) contracts for purchasing consumer goods and the accompanying warranties; (iii) unfair commercial practices; (iv) unfair contracts' terms; (V) travel packages; (Vi) consumer loans.

Pursuant to the legislation on overall safety, and trade of non-food products, SIMS is the responsible structure for the oversight of all products, services or group of non-food products intended for consumers, as well as for the inspection of tourist activities, as stipulated in the legislation on tourism³¹. SIMS is also responsible for looking into the implementation of the mandatory legal requirements in the field of: (i) consumer protection, as stipulated by the law on consumer protection (LCP); (ii) the protection of industrial property, as stipulated in the legislation on industrial property; (iii) guaranteeing the protection and implementation of copyright laws; (iv) metrological inspection, according to the legislation on metrology; (v) labeling of power consumption and other resources impacting energy products pursuant to the legislation on information on power consumption and other resources of products impacting energy; (vi) control of detergents on the market under the provisions of the law on detergents; (vii) inspection of tourist activities, based on the law on tourism.

³¹Decree of the Council of Ministers, no.36, Date: 20.01.2016.

²⁹ Established by Decree of Council of Ministers no. 36, date 20.1.2016 "On the establishment, organisation and functioning of the state inspectorate for market surveillance".

³⁰ Cross-Cutting Strategy 2020.



SIMS is the structure responsible for supervision of the market of consumer products. SIMS functions pursuant to the legislation on the general safety of non-food products and the legislation on trade and supervision of the non-food products. It supervises all products, services and group of products which are non-food, as well as it inspects tourism activities pursuant to the legislation on tourism³². SIMS is also responsible for inspecting the implementation of compulsory legal requirements in the following fields: (i) consumer protection, pursuant to the LCP' provisions; (ii) protection of intellectual property, pursuant to the provisions of the intellectual property legislation; (iii) protection of copyright and other rights related to it; (iv) metrology inspections, pursuant to the provisions of the metrology legislation; (v) energy labeling and labeling of other sources impacting energy, pursuant to the provisions of the legislation on information on energy consumption and other energy sources; (vi) control of cleansing products placed within the market, pursuant to the provisions of the law on cleansing products; (vii) inspection of tourism activities pursuant to the provisions of the tourism law.

As already mentioned above, a new system for the resolution of consumer related disputes has been proposed in the area of ADR.³³ This new legislative proposal aims to provide consumers with an alternative solution to the courtroom, especially relevant for disputes involving small amounts of money. The proposal of creating ADR schemes intends to be gradually extended in all sectors for all disputes between customers and traders. But this project is still on-going and the relevant legal and sub-legal acts for its realization are not yet completed. Currently consumer complaints are received and followed-up by the CPC, which offers an online complaints system³⁴ in its website, reducing thus the administrative deadlines.

In relation to market supervision, the findings of the "Consumers' voice" survey³⁵, funded by USAID under the framework of its programme "Market monitoring and supervision and consumer protection" show that: (i) state presence in consumer protection is considered low by 35% of the respondents; average by 32% and lacking by 18%; b) the work performed by the employees of the consumer protection unit is considered low by 31% of the respondents; average by 25% and lacking by 24%; c) corruption in the market supervision system is perceived to be high by 42% of the respondents, average by 32% and low by 14%.

A monitoring report of the 2013 crosscutting strategy³⁶ reveals that the only progress noted with regards to consumer protection and market supervision, is achieved in the legal field, with the approval of the legal framework. With respect to law implementation the situation is as follows:

- Market supervision activity has been minimal, because conducted by various inspectors of specific sectors and ministries (this activity is expected to significantly improve by the establishment of the High State Inspectorate);
- ii. The CPC has issued few decisions regarding consumer protection;

³² Vendim i KM, Nr.36, Date: 20.01.2016.

³³ GIZ, Evaluation of the Regulatory Impact, ZAlternative Dispute Resolution for Consumers, December 2015.

³⁴ http://kmk.ekonomia.gov.al/index.php/ankesa/

³⁵ http://www.slideserve.com/rhea/sondazh-zeri-i-konsumatoreve-ne-diten-nderkombetare-te-konsumatoreve

The document has been made available by the Consumer Protection Office



iii. Consumer rights' education has been included in the high school and university curricula and a series of roundtables and workshops on this issue have been conducted.

VI. CONCLUSIONS AND RECOMMENDATIONS

Consumer rights protection in Albania is carried out through government policies, legal framework, and its implementation, performed by state structures, market actors or consumer protection associations. To date there are steps forward toward bringing the legal framework in line with the acquis communautaire. However, the legal and institutional framework needs to be strengthened and legislation should be implemented by well-organized institutions that would provide their influence for the introduction of good trade practices in this respect.

It is worth noting that the role of consumer associations has been very important and active since the early 1990s, and with the signing of the SAA between Albania and the EU, consumer protection has taken an even more important role and a new legal framework oriented toward alignment with the EU legislation has been adopted. Also, the relevant institutional structures for consumer protection have been set up. With regards to the functioning of the institutional and legal framework in the field of consumer protection, it can be noted that although the country has made steps forward when it comes to the adaptation and harmonization of Albanian legislation with that of the EU, much more remains to be improved in the institutional framework. Bodies and institutions responsible for consumers protection are relatively new and little experienced in the field. In this context, the aim should be that of consolidating the experience by promoting cooperation with other institutions that focus on customer protection, such as the Competition Authority. This cooperation would lead to policies aimed at market supervision by not allowing traders to abuse their power at the expense of the consumers. From a general comparative overview with the European legal framework, our legislation still lacks provisions for: (i) special ways for marketing communications, targeting the consumer; (ii) codes of conduct; (iii) electronic trade; (iv) public services offering; (v) and class action for consumer compensation.

Despite all the positive developments in consumer protection legislation there is still room for improvement in terms of introducing new provisions in full compliance with those of EU law. In fact, the drafting of the New Strategy 2014-2020 for Consumer Protection and Market Surveillance, which gives a central role to the consumers and aims their empowerment by giving them an active role in the market, should be commended.

More room should be given to citizens' education with regards to their rights as consumers and the instruments available to them to exercise their rights, through information campaigns spread throughout the territory of the Republic of Albania, be it on traditional or social media, so that the information is easily accessible to the public

Success stories of consumer protection of the Competition Authority of EU member states, such as Italy and the Netherlands, can be adapted and implemented in Albania in the future. Provided that, as mentioned above, the responsible bodies and institutions on consumer protection in Albania, are relatively new and with little experience in this field, cooperation should be fostered with other institutions that focus on consumer rights.