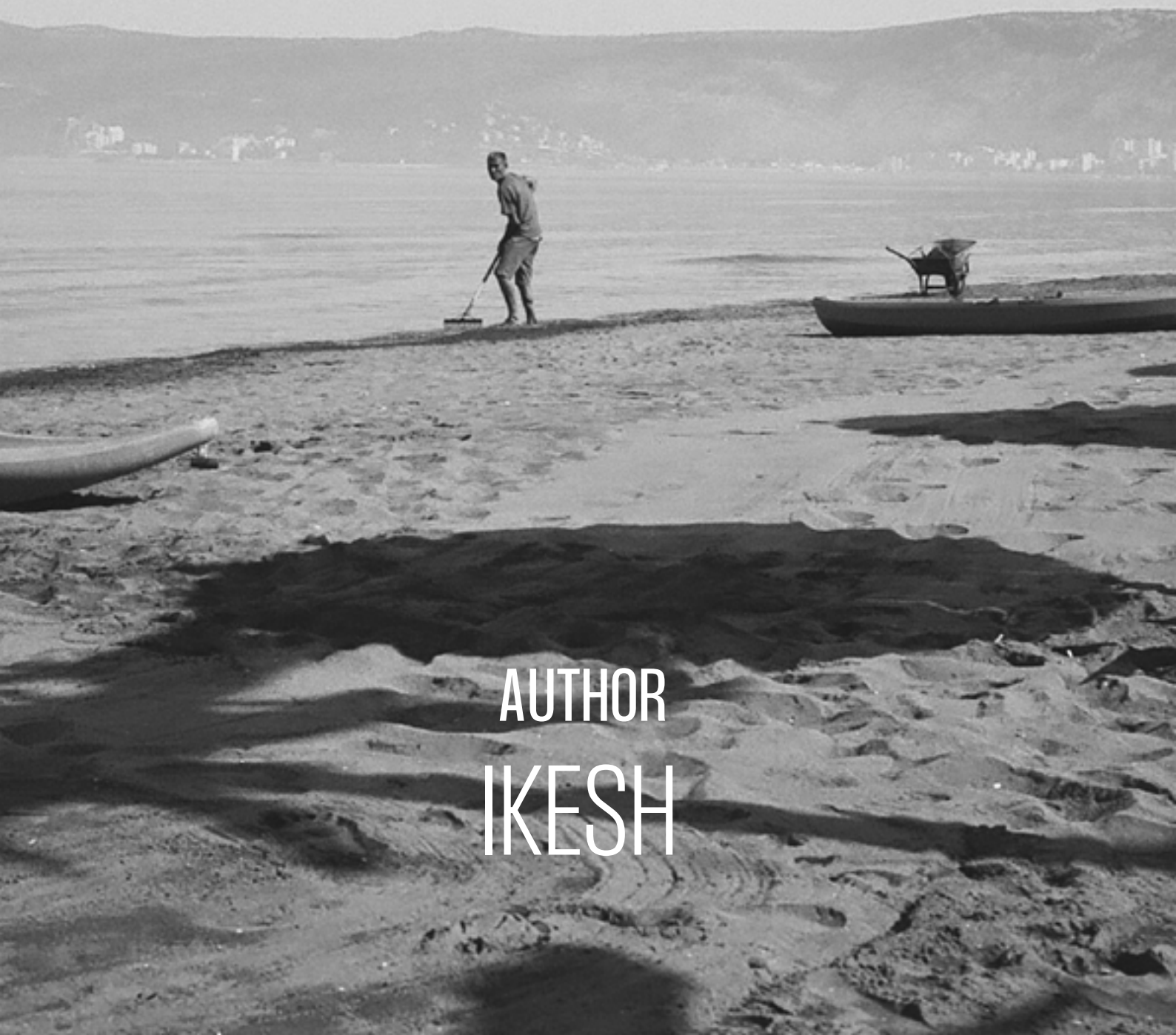


SEASONAL EMPLOYMENT IN COASTAL TOURISM BETWEEN INFORMALITY, INSECURITY AND WORKERS' RIGHTS



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Since its establishment in 2014, the Institute for Social Critique and Emancipation has focused on labor issues and the analysis of working conditions, especially in sectors of significant importance to the country's economy. The study "The Condition of the Working Class in Albania" (2015–2016), published in two parts, examined workers from sectors such as garment manufacturing, call centers, construction, extractive and processing industries, and light industry, with the aim of presenting as clearly as possible the conditions in which they live and work, and of making them visible in the public sphere not merely as statistics but as testimonies of social injustice.

Another study, "The Proletarianization of Albanian Peasantry" (2017), analyses rural communities, highlighting their conditions, incomes, and challenges. In 2023, the report "Study on Working Conditions in the Garment Sector" was published, focusing specifically on the working environment in garment manufacturing. Motivated by the widely publicized "success" and the increase in revenue within this sector, the study aimed to understand the extent to which these profits translate into improved earnings for workers.

Services constitute a very broad sector, but for us, the seasonal labour operating within it—specifically in coastal tourism—has been a strong incentive for further research. This focus stems from tourism's importance to the national economy, as well as from a desire to ensure that seasonal workers in coastal tourism become part of the public discourse not merely as a quantitative or qualitative shortage, but as subjects whose working conditions are documented objectively, aligning the portrayed reality with what is often promoted in the media.

In the Albanian context, the literature on seasonal work in tourism remains limited. Most analyses concentrate on the development of tourism as a sector, the growth of revenues, or the promotion of Albania as a tourist destination, while overlooking the experiences and needs of the workers who sustain this industry. This study seeks to address that gap by examining seasonal employment in coastal tourism in Albania not only as an economic phenomenon but also as a social and political issue requiring structural intervention.

INTRODUCTION

ShqipëriaAlbania is a country whose highest economic activity is based on services. A novelty of the last decade is coastal tourism, which has been in the focus of everyone, from tourists to investors. Over these years, much has changed, turning it into a generator of high figures, but what matters most is how these translate into the number of employed, wage levels, and the effect on communities, and how they have changed over the years. What we try to understand is whether this development is being built on a deep contradiction between an expanding sector and the working conditions of seasonal workers.

Before strategic investors, there was the local family business, a form of organization that keeps the locality active and empowers communities by circulating income within the area and increasing community welfare. With a very high level of emigration, instead of empowering the latter, the holders of political power chose the former as a development model. In a few years, this became the prevailing logic, and along the entire coastline, we now have hotels and resorts as investments, whether from hotel chains or people who choose to invest sums of money of unknown origin and gain the status of strategic investors. Likewise, foreign buyers are increasingly considering buying coastal properties as a good investment.

If 10 years ago Albania was unspoiled beauty and inspiring for those who preferred nature, today the coastal line with built infrastructure has been concreted with the sole criterion of generating profit for those who build. This transformation has brought tourists, but this development model is not sustainable. The path followed for development has come without a study based on the needs of the community and its inclusion so that this would be an as organic process as possible. Today, in a significant part of the coastline, Albania is neither wild nature nor authentic. Add the fact that it is no longer a cheap destination. All these are factors that may affect the decline of tourist interest in the future.

A fundamental issue remains the determination of the type of tourism we want to develop. There is often the impression that maximum revenue can be achieved through elite tourism: that is, by investing in high-standard structures and making the most of our coastline, which is limited compared to neighboring countries. However, this model requires a wide infrastructure transformation and is accompanied by its own questions.

Here arises the main dilemma: should Albania focus on mass tourism, which has a lower cost for tourists, or on elite tourism, which requires larger investments but generates higher revenues from a smaller number of visitors?

Considering the small area of the country, one would expect there to be no infrastructure problems hindering the development of elite tourism. However, this model tends to exclude residents themselves, as high prices in some coastal areas make it difficult for citizens to vacation in their own country. On the other hand, mass tourism also brings negative consequences, especially regarding pollution and environmental damage.

A development model that does not place the locality at the center of planning creates significant consequences in the social and spatial structure of areas. Such an approach produces territorial fragmentation, weakens communities, and disrupts existing socio-economic balances. The lack

of support mechanisms for local residents, who should be considered key actors in development processes, leads to their departure from the territory, as it no longer provides the necessary conditions for a sustainable life.

This migratory process creates a significant deficit in the local workforce and forces businesses to orient recruitment towards external workers. Unlike traditional family enterprise structures or the employment of workers from the local area, which was common practice in the past, today there is a noticeable and persistent shortage of local staff.

Although workers coming from outside the community may offer more technically qualified services, their lack of organic connection with the local culture and traditions limits their capacity to provide an authentic service. This situation produces not only economic consequences but also a loss of cultural values, compromising the quality and authenticity of the tourist experience that the locality can offer.

The need for staff in the coastal tourism sector is not very old, but it has changed over the years. The specificity of this work is its seasonality, which occasionally creates a certain imbalance in other aspects. For example, in the workers' places of origin (understood as the city where they live and work), job positions remain vacant. Problems also arise in reintegrating workers after the season. The real problem of seasonal work lies in motivating employees to return the following year to the same workplace and to turn seasonal work in coastal tourism into a sustainable profession. This work is mostly seen as a challenge for a certain period of life, such as the time when one is a student or the time when one has not yet achieved professional stability, and certainly before taking on family responsibilities. However, this leads to fragmented experience and qualifications, and currently there are no policies that encourage continuity of work in this sector from staff with work experience.

In this sense, the study seeks to answer the question: **What are the working conditions of seasonal workers in the tourism sector in Albania?** More specifically: What are the concrete experiences of seasonal workers regarding wages, working hours, and working conditions? To what extent are they represented in trade unions or other protection structures? What gaps exist in the current legal and institutional framework to guarantee the protection of their rights?

Answers to these questions will contribute to a better understanding of the socio-economic aspects of seasonal work in Albania and will enable the formulation of recommendations for sustainable interventions in public policies.

The aim of this study is to analyze the working conditions of seasonal workers in the coastal tourism sector in Albania, identifying the main challenges they face, informal employment and job insecurity, as well as contributing to suggestions for legal reforms, strengthening trade union organization, and improving policies that protect their rights.

Seasonal workers are one of the groups most affected by challenges in the workplace. In this sense, the issue of seasonal work is not only a challenge for the labor market but also a test of social justice and institutional commitment to human rights in Albania. Therefore, the objectives of this study are:

- *To analyze the current state of the tourism sector;*
- *To analyze the working conditions of seasonal workers, including wages, working hours, occupational safety, access to basic services, and their treatment by employers;*
- *To review the level of informality and the lack of legal protection for this category of workers;*
- *To propose concrete recommendations for institutional actors, civil society, and trade unions to improve the protection and rights of seasonal workers;*
- *To contribute to raising public and political awareness about the challenges of seasonal work in the tourism sector.*

The significance of this study lies in the fact that it does not treat seasonal workers merely as statistics, but as individuals with concrete experiences, needs, and rights that require protection and representation. The study can contribute to debates on reforming the Labor Code, strengthening trade unions, and building a fairer model of economic development.



1. THE ALBANIAN COAST BETWEEN TOURISM DEVELOPMENT AND EMPLOYMENT DYNAMICS

1.1 History, Boom, and Economic Impact of Tourism

Albania has experienced a significant increase in the number of tourists and interest in its natural and cultural destinations. Additionally, the country's picturesque landscapes, natural and cultural diversity, rich heritage and history, and warm Mediterranean climate have highlighted Albania as a growing destination in the European tourism scene. According to official data, "In 2023, Albania ranked 4th globally for the highest growth rate in international tourist arrivals, registering a 56% increase compared to 2019" (National Strategy for Tourism Development 2025–2030, p. 7).

The real tourism boom occurred after the pandemic, with foreign tourist arrivals surpassing 10 million for the first time in 2023 and reaching 11.7 million in 2024 (National Strategy for Tourism Development 2025–2030, p. 10). Tourism has changed Albania's image, which is now labeled in foreign media as the "Maldives of Europe," with low costs (Ecco "le Maldive d'Europa", si paga la metà e si sta meglio: vicinissimo a noi, 2024). Pre-bookings by foreign agencies stimulated hotel investments, which began adopting the "all-inclusive" model. "By the end of 2023, 'Accommodation and Food Services' reached 3.6% of GDP, up rapidly from 1.54% in 2016" (Monitor, 2025).

"Revenues from foreign travel in 2024 reached a record €5 billion, according to the Bank of Albania, with a balance (excluding Albanians' spending abroad) remaining positive at €2.3 billion" (Monitor, 2025). Driven by tourism interest, investments have expanded rapidly in recent years, but mostly in tourist villages, which offer quick returns for investors but add less value to the overall economy.

Still lower property prices compared to regional countries are encouraging strong interest from foreigners, who, according to the Bank of Albania, purchased nearly €1 billion in real estate between 2022 and 2024. However, the rapid growth of the tourism sector is also accompanied by serious challenges. Current infrastructure is unable to handle the new influxes, resulting in heavy traffic and continuous delays. Moreover, prices are rising quickly, negatively affecting local residents (Monitor, 2025).

The biggest problem relates to uncontrolled interventions in coastal areas. Rapid construction, especially in the south, is damaging nature—the main factor making Albania an attractive destination. International media have also begun warning about this trend: "The Telegraph" recently highlighted that the country risks facing a typical overtourism scenario (Albania could be on the fast track to an overtourism nightmare, 2025).

On the other hand, the government still does not have a clear strategy regarding the model of tourism it aims to develop. Efforts to steer the country toward high-end tourism do not align with the current realities of infrastructure, waste management, and the lack of a qualified workforce. Clearly, the high interest in Albania is being used to justify uncontrolled urbanization along the entire coastline—a process that risks becoming a major problem in the near future.

Economic Data on Tourism

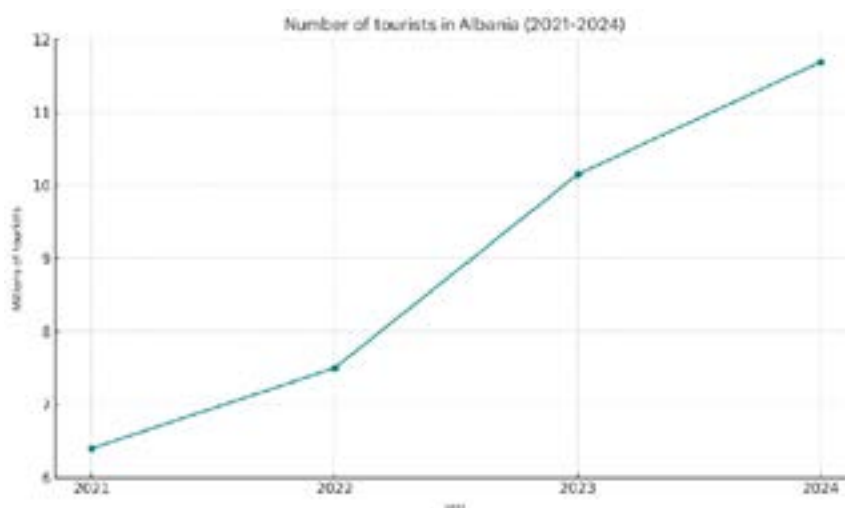


Chart 1 (ALTAX, 2024)

This chart illustrates the steady growth in the number of tourists visiting Albania from 2021 to 2024, with a particularly marked increase after 2022, coinciding with the post-pandemic recovery period following COVID-19 lockdowns. Specifically, “In 2021, Albania was visited by 6.4 million tourists; in 2022, 7.5 million tourists arrived. In 2023, the number increased to approximately 10.15 million tourists, and in 2024, it reached 11.69 million tourists” (Multidimensional Analysis of Tourism in Albania, 2024).

Tourism Industry Revenues

According to the methodology of the World Travel & Tourism Council (WTTC), the economic impact of tourism is divided into two main categories, which encompass much more than just tourist spending.

1. Direct Contributions

These are revenues that come directly from typical tourism activities—such as payments for hotels, restaurants, transportation, tour guides, and other services used by visitors. In other words, they relate to everything consumed directly by tourists during their stay.

2. Total Contributions

Here, the WTTC also includes the effects that tourism generates in the economy beyond direct spending. This includes:

- **Indirect effects**, such as the supplies purchased by tourism businesses (food, equipment, energy, etc.), investments in infrastructure, hotels, transportation means, and supporting services.
- **Induced effects**, related to the spending by tourism industry employees using their income (e.g., purchases in stores, payment for services, etc.).

Thus, according to the WTTC model, the contribution of tourism is not limited to what tourists spend but encompasses the entire chain reaction that tourism creates in the country's economy, affecting sectors such as construction, transport, food, entertainment, and many others (WTTC Methodology Report 2020).

Impact of Tourism on the National Economy through Direct Contributions Only

Between 2020 and 2024, direct tourism revenues grew from very low levels to significant increases, reflecting the sector's recovery and strengthening. In 2020, due to the pandemic, tourism generated only **€856 million**, accounting for **5.6%** of GDP. With the reopening of the country in 2021, revenues rose sharply to **€1.867 billion**, increasing the GDP share to **10.3%**.

Growth continued in 2022, with revenues reaching **€2.766 billion** and the GDP share rising to **14.5%**, indicating a full sector recovery. In 2023, tourism experienced a true boom, generating **€4.123 billion** and reaching **17.5%** of GDP. For 2024, forecasts estimate revenues of **€4.8 billion** and a **17.7%** share, confirming that tourism has become a sustainable and highly significant pillar of the national economy.

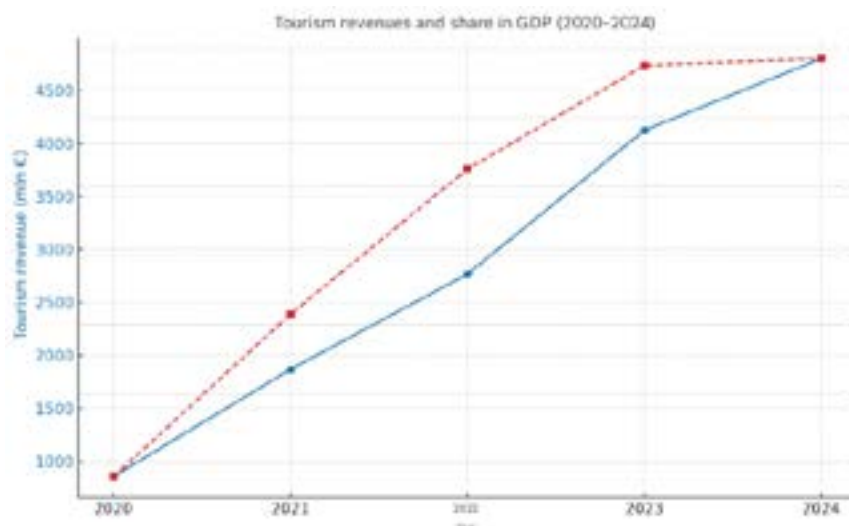


Chart 2 (Ministry of Finance and Economy, 2024)

- Blue line: **Direct tourism revenues** for each year (2020–2024), in million euros.
- Red line: **Tourism's share of GDP**, in percentage.

Rritja është e qëndrueshme si në vlerë absolute, ashtu edhe në kontributin e turizmit ndaj ekonomisë kombëtare, duke kaluar nga 5.6% në 2020 në 17.7% në 2024.

Impact of Tourism on the National Economy according to Total Contributions

This follows the official WTTC model for calculating tourism's contribution to the national economy, which we will also reference.

In 2020, tourism contributed only 10.3% to GDP, as pandemic restrictions paralyzed travel. In 2021, the sector recovered quickly, rising to 16.6%, thanks to border reopenings and increased visitor numbers.

In 2022, tourism experienced a real boom, reaching 21.6%, indicating a strong sectoral recovery and high demand. In 2023, the contribution stabilized at 22%, showing that tourism has become a sustainable pillar of GDP (Albania Travel & Tourism Economic Impact Research)

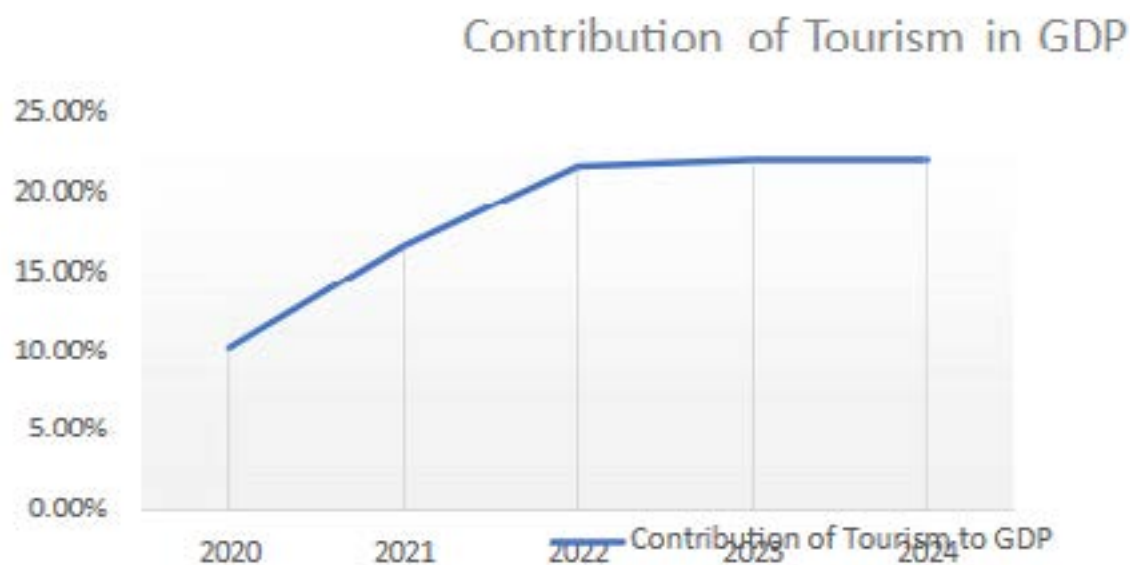


Chart 3 (World Travel & Tourism Council, 2025)

1.2 Types of Coastal Tourism in Albania

Tourism in Albania has developed significantly in recent years, becoming more extensive and diversified. Today, it focuses on three main areas: coastal tourism, which remains the dominant segment; cultural tourism, linked to historic cities and archaeological heritage; and nature-rural/ecotourism, which utilizes mountain resources and natural environments for sustainable activities throughout the year (INSTAT, 2023, p. 14).

The country has six national tourism development units, divided according to geographical areas and their tourism potential. In our study, we will focus on coastal tourism, which includes only two coastal clusters: the Adriatic Coast Cluster and the Ionian Coast Cluster (National Strategy for Tourism Development 2025–2030, 2025).



Chart 1: General View of the Tourism Clusters (National Strategy for Tourism Development 2025–2030, p. 31)

In both coastal clusters, despite initiatives for high-end tourism, mass tourism remains dominant, characterized by a high number of visitors, accommodation facilities with large capacity, and standard offerings for mid-range budgets. “Sun and Beach” tourism is one of the main pillars of coastal tourism development and remains the most widespread and economically sustainable form of tourism along the coastline, both in the Adriatic and Ionian clusters.

The cultural and historical heritage of the coastal areas adds value to the tourism offering, which is why many tourists choose to visit Albania’s coast for cultural and historical reasons as well. Around the Adriatic and Ionian coasts, other forms of tourism are also developing, such as agrotourism and gastronomic tourism. The coastal areas are rich in landscapes that also favor nature and adventure tourism. This type of tourism includes birdwatching, hiking, diving, and paragliding, offering more active and authentic experiences. Many young visitors have been coming to Albania for years, and the nightlife venues and clubs, *Llojet e turistëve që vizitojnë bregdetin shqiptar* often overcrowded with tourists, indicate the emergence of a new type of tourism—entertainment and nightlife tourism—especially considering that thousands of tourists come specifically for festivals and music events in coastal areas, such as UNUM and Durrës Fest in the north, or Kala Festival, South Outdoor Festival, and Solar Festival in the south. High-end tourism, as well as maritime and nautical tourism, is emerging in areas such as Vlorë, Orikum, Sarandë, and Porto Palermo. Ecotourism and nature-based tourism serve as complementary forms supporting other types of tourism. The Albanian coast offers a wide variety of

tourism types, and it is important to note that they are interconnected (National Strategy for Tourism Development 2025–2030).

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Types of Tourists Visiting the Albanian Coast

Albania is primarily a destination for holiday and personal visits, while other travel segments remain marginal.

Purpose of entry	August 2024	August 2025	Annual change	January–August 2024	January–August 2025	Change in %
			(%)			
Total entry	2167665	2381864	9.9	8529711	8969005	5.2
I. Personal	2150608	2360833	9.8	8392500	8800969	4.9
1. Vacation, visiting relatives, etc.	2104779	2238739	6.4	8136045	8338619	2.5
2. Health treatments	9	49	444.4	492	294	-40.2
3. Religious purposes	56	38	-32.1	286	335	17.1
4. Transit passengers	45764	122007	166.6	255677	461721	80.6
III. Business and professional	17057	21031	23.3	137211	168036	22.5

Table 1 (Movements of Citizens in Albania, 2025)

According to the purpose of travel, tourists visiting Albania can be categorized as follows: those coming for “Sun and Beach” holidays, who constitute the largest group; family tourists; cultural tourists; adventure and nature tourists; gastronomic tourists; entertainment-oriented tourists; and patriotic tourists.

By geographical origin, tourists are identified from the region (Kosovo, North Macedonia, Montenegro, Greece), attracted by proximity and cultural ties; from Central and Eastern Europe (Poland, Czech Republic, Hungary); from Western and Northern Europe (Germany, Switzerland, Sweden); as well as from the Albanian diaspora (Italy, Greece, Germany, USA). The National Tourism Strategy 2025–2030 states: “Neighboring countries such as Kosovo, Montenegro, Greece, and Italy constitute the main source markets” (Ministry of Tourism and Environment, 2025).

According to tourist behavior, the main groups include independent and individual tourists, tourists on organized packages, backpackers and minimalist travelers, elite tourists with high financial capacity, as well as tourists oriented towards sustainable tourism and ecotourism, interested in nature conservation and supporting local communities.

Sa zgjat turizmi bregdetar në Shqipëri?

Coastal tourism in Albania is one of the most developed forms of tourism, thanks to the 316 km coastline along the Adriatic and Ionian Seas, which offers high potential for beaches and summer activities. However, despite this potential, the tourist season remains limited and is mainly concentrated in the summer months. The official preparation and management period for the season runs from May 1 to September 30 (General Directorate of Taxes, 2025).

According to data from active and inactive taxpayers during June–September, actual tourism activity is most intensive in these four months, making the coastal season relatively short (Tourism Sector Plan, 2025). Entry and exit statistics also confirm that the coastal season lasts about 4–5 months, primarily from June to September, during which the highest number of foreign tourists is recorded, seasonal employment rises, and revenues from accommodation and tourist services increase. In years with favorable weather, the season can extend into May or October, but June–September remains its core. Certain southern areas, such as Dhërmi, Jale, Himara, Ksamil, and Saranda, benefit from a warmer climate, allowing a slight extension of the season, while northern areas like Shëngjin, Velipoja, and Golem have a shorter season due to climatic conditions.

Currently, tourism in Albania exhibits a high level of seasonality, as nearly 40% of annual arrivals occur only in July and August. This uneven distribution indicates significant dependence on the summer peak period. According to government forecasts, the extension of the tourist season to a 5–6 month period over the next decade is expected to be achieved through infrastructure investments, capacity building via training, and a stronger international promotion strategy. However, this process remains conditioned by major challenges related to destination management, service improvement, and the creation of sustainable year-round tourism offerings (National Strategy for Tourism Development 2025–2030).

1.3 Turizmi mes punës dhe nevojës

Over the past decade, tourism has gained a level of attention that it did not have ten years ago, along with a corresponding form of promotion and investment along the coastline. The Ionian Coast has been a surprising success, promoted as the “Maldives of Europe” (Ecco “le Maldive d’Europa”, si paga la metà e si sta meglio: vicinissimo a noi, 2024). Not far behind are Velipoja, Shëngjin, and Durrës along the Adriatic Sea, which have also adapted accommodation structures, primarily hotels, and are generally less expensive compared to the south of Albania.

The transformation of the area, where beach bars have given way to luxury complexes and resorts, and the noticeable shift in the type of visitors—including an increase in European tourists—requires service specialization. Thus, alongside rising investments and the emergence of these coastal areas as attractive destinations, there is also a growing need for human resources capable of providing quality services. Facing the urgency to establish Albania as a serious alternative in the global tourism market also comes the need for sufficient hospitality capacity, both infrastructural and human. Being new in this market and lacking experience, it is natural to encounter such needs. At the governance level, the task remains to rely on best practices and models comparable to our country in order to build a tradition in tourism that can become a strong and sustainable asset.

Lack of Qualified Workforce

The entire coastline faces difficulties in finding sufficient labor, as evident from media statements by business representatives and from observing staff who serve continuously from morning until the closure of bars or restaurants, as well as the increasing number of agencies bringing foreign workers who provide services in these establishments. The south of Albania appears particularly challenged yet attractive due to the higher wages it promises.

Public perception so far is that wages are very high and seasonal work on the coast is highly desirable. However, a closer look at the situation in a free market economy, like ours, shows the opposite. If seasonal work were truly so attractive, demand would naturally orient toward it, perhaps leaving gaps in other sectors, but this is not the case in the sector considered the driver of the country’s economic development. Based on this premise, we were motivated to investigate further the working conditions and wages of employees in coastal tourism.

The Question Arises: What Does the Government Plan for Employees in This Sector?

So far, podcasts (Rama, 2024)¹ and social media posts have often replaced official decision-making institutions, attempting to provoke public reaction through various statements. The only nearly official government document is the National Tourism Strategy 2025–2030, which provides several observations and tentative solutions. We will focus specifically on topics relevant to our study. It is important to note that the strategy addresses all forms of tourism and is not focused exclusively on coastal tourism, which is the field of our study, and informal employment is extremely high, making it impossible to calculate exact current needs and conditions.

Firstly, there is a recognized shortage of labor, without specifying the level of qualifications. In 2024, approximately 40,000 people were employed across the entire tourism sector. Specifically, in coastal tourism, around 20,000 people are employed (Monitor, 2025). According to official requests from institutions, in the Bar–Restaurant–Hotel sector in Lezhë, Durrës, Vlorë, and Sarandë, there are 4,431 employees (Annex 1). The National Tourism Strategy predicts that the current workforce of 42,000 across the tourism sector will increase to 73,000 over the next five years, in line with the planned expansion of accommodation structures. The main challenge remains, first, the actual current need to cover the seasonal influx, and second, who will meet this increased demand.

According to the strategy, the labor shortage will be addressed by educational institutions supplying qualified students for tourism positions, as well as by integrating women into the labor market through training and courses designed to qualify them for this sector. The latter represents a significant challenge, especially since it is not supported by a detailed implementation plan.

Secondary and Higher Education Programs as a Solution for Tourism

The need to be met by vocational secondary schools and higher education institutions is emphasized through programs tailored for tourism services. A key question is how these curricula are designed—whether they are updated with current global knowledge and practices. For Albania to become an international destination, all parts of the tourism chain must be prepared. Another unclear point is how effectively these institutions have supplied the labor market with qualified personnel for these positions. Ideally, a detailed overview or reporting system should exist to track how students from schools or universities are guided toward employment in tourism, specifically coastal tourism. A general look at the National Tourism Strategy does not clearly show how young people will be attracted to study in these fields at a time when they are faced with job insecurity, lack of professional development, and the phenomenon that has absorbed them: emigration. (Stop the emigration pandemic, 2024). Leaving aside for now the lack of data that characterizes us at the institutional level, let us focus only on the question of why a qualified young person would choose to move from their place of residence and work in

1 Minutes 20:30–22:30: Immediately after the season, Prime Minister Rama declares that no new permits will be issued for beach bars, but only for hotels. 27:40–28:40: Rama, together with his guests, expresses relief that, given the strong demand for workers, it is the right moment for businesses to pay higher wages. The conversation highlights that wages in Albania are now competitive even with Greece, with some returning workers noting that it is more worthwhile to work in Albania than in Greece. One guest adds that certified seasonal workers can earn wages that surpass even those of managerial positions

coastal cities for 3–4 months for an average salary similar to what they could earn in the capital city, without having any security for the months after the season and the following year?

Are salaries enough?

Although the NTS does not discuss salary levels, the move made by the General Directorate of Taxation in publishing a list of indicative wages shows that this is a real problem. Indicative wages suggest a minimum threshold for different positions, but this does not show whether they are sufficient and attractive enough to draw workers toward these positions. With a quick look, where the lowest level is 55,000 lek and the highest is 140,000 lek, it does not seem very promising. Moreover, this list is not mandatory and carries no sanctions for cases where it is not applied; the only consequence in the case of non-compliance is that the business is subject to increased inspections, which again in our context, given institutional fragility, is unlikely to translate into additional income for workers. (Indicative tourism wages, 2025). Based on this wage level, the indicative wages in fact dismantle the myth that seasonal work is well paid. Furthermore, even for this wage level, even though it is not mandatory, there have been reactions from businesses considering it unfair and a step leading them toward bankruptcy. On the other hand, even this has not been sufficiently motivating to generate increased interest in seasonal work, which is also evident from the high number of foreign workers who have filled the labor market needs.

Another major issue that directly affects both workers and the state through tax collection is informality and the non-declaration of real wages, known as working with two payrolls. Through non-declaration and exclusion from the social security scheme, workers remain unprotected in the face of any accident or violation of their rights. Moreover, this has short-term effects in cases where the worker needs income declaration for various reasons, and it deprives them of a dignified pension in the future proportional to the work they have done. In the “Sectoral Tourism Plan, 2025,” published on June 9, 2025, after the tourist season has practically begun, it is stated that steps will be taken to verify undeclared workers in the social security system and to identify cases where there is wage under-declaration (General Directorate of Taxation, 2025). How the GDT will report its work, how efficient it has been in verifying these cases, and what measures have been taken remain to be seen.

Thus, salary is only one element, which is not sufficient even at the recommended levels, and secondly, it does not stand alone because it also requires other complementary elements related to working conditions.

The hot potato: the status of the seasonal worker

For seasonal work, it must be taken into account that it is not simple work, but professional work that requires seriousness in handling solutions. The flexibility required by seasonal work, combined with the high influx, makes adaptation even more difficult. In Albania, this form takes

the shape of suspending normal life for work during the season. It is enough to have known people who have worked during the season and to recall how they disappear during that period, or conversations with workers who have served us during our holidays, to understand the working conditions. What is noticeable is that it is becoming increasingly difficult to see employees over the age of 30 working in this sector, and this is the real challenge: if tourism is to remain the engine of the Albanian economy, the employees in this sector must be aimed to become permanent. One way this can be achieved is by looking at how regional countries such as Greece or Italy have acted, as they have adopted the status of the seasonal worker, which financially supports seasonal workers for up to 6 months, bringing significant stability compared to Albania. In the STP this is mentioned as an issue and as an objective, but the proposal still remains very far from reality since in no document is the situation of seasonal workers presented as it actually is, which is also the main focus of this study.

Returning to the STP, it is proposed that there be financial support from the state for seasonal workers for up to 6 months and that it be conditional on businesses employing workers the following year. This would be an appropriate solution for this category of employees, but the reason we remain skeptical is that this proposal seems very far from reality given that almost the entire sector is based on assumptions or very superficial figures, without having an implementable and well-studied development plan, without addressing the logic of abuse with coastal constructions, and knowing well the conditions of workers and the circulation generated by tourism, this remains a big bubble. It is essential to insist on including the stakeholders, especially those who practically sustain tourism, who are the workers themselves.

Foreign workers and minors

Foreign workers are increasingly seen as a solution to the lack of labor force in various sectors in Albania; tourism is no exception. For 2024, it has been reported that around 6,900 seasonal workers in tourism were foreigners, almost half of all foreigners working in Albania (Monitor, 2025). The reasoning has been interesting specifically for tourism: foreign seasonal workers, due to the flexibility of short-term contracts (meaning only seasonal), are more suitable than locals, who seek long-term employment throughout the year, and they are more willing to work extra hours compared to locals, who do not prefer it (Azo, 2025). If we take the total number of seasonal workers in Albania for 2025, which reaches around 19,115, although it is not clarified whether this figure includes foreigners or not, the number of workers in this sector is high. Therefore, this category, also due to the difficulty in contacting them, needs separate research and treatment, conditioned by their specific characteristics.

The need for a labor force does not exclude minors from the market, driven by the need to support their family's weak economic situation. In this case too, it is difficult for state mechanisms to protect this category from violations, considering the broader picture of the current labor situation. The case of minors is delicate, because except for very moderate and safe work, they must be ensured an appropriate environment so that their potential is developed and applied at the moment when they can legally be part of the labor market.

Both categories, foreigners and minors, need special legal treatment and regulation since they are even more vulnerable to rights violations.

1.4 The legal framework for seasonal work in Albania

Tourism in Albania has become an important source of employment, especially during the tourist season, when the demand for labor increases significantly. However, seasonal workers face uncertainty, as there is no clear definition or legal regulation for their status. This legal gap makes it difficult to protect the rights of this category of employees.

Although the Labour Code aims to regulate employment relationships in all forms, it does not offer special provisions for seasonal employment. Relevant institutions such as the Ministry of Finance and Economy, the Labour Inspectorate, the National Employment Agency, etc., play a role in administering and overseeing the labor market, but the lack of a specific legal framework for seasonal workers in tourism continues to be a challenge in guaranteeing equal protection for all employees.

Part-time/seasonal work

As mentioned above, the Labor Code does not contain a specific article that regulates in a special manner the relationship between employers and employees during the tourist season. However, in the absence of a specific regulation, the Labor Code has articles that may be interpreted and applied to this category of employees.

According to Article 14 of the Albanian Labor Code, amended by Law No. 136/2015, a clear legal basis is provided for part-time employment, which may also be applied to seasonal workers who are often engaged in reduced-hour and temporary work. This article, paragraph 1, states that *“under a part-time employment contract, the employee agrees to work by the hour, half-day or full day, for a weekly or monthly duration shorter than that of full-time employees working under the same conditions”* (Labor Code of the Republic of Albania, 2024, p. 4). The article creates the possibility of employment with reduced hours and the possibility of employment for a short period of time, enabling seasonal workers to fit into this category of employees.

Furthermore, paragraph 2 of the article emphasizes equality of treatment by stating that *“part-time employees enjoy the same rights as full-time employees performing the same work”* and that *“if the employment conditions are directly related to working time... the part-time employee enjoys proportionate rights.”* (Labor Code of the Republic of Albania). This means that seasonal workers, regardless of the duration of employment or reduced hours, are entitled to social and health insurance contributions, annual leave, equal treatment in the workplace, and any other benefit deriving from the employment contract, by applying all the articles foreseen in the Labor Code.

Thus, Article 14 of the Labor Code not only recognizes part-time work as a legitimate form of employment but also strengthens it with a series of legal rights and guarantees that are applicable to seasonal workers as well. This makes it necessary for employers to respect the principles of equality, proportionality, and transparency when hiring this category of employees.

Unlike Albania, Croatia recognizes seasonal work through Article 18 of the Labour Act, which regulates fixed-term contracts for permanent seasonal jobs, establishing the necessary legal

framework for sectors that operate primarily on a seasonal basis, such as tourism, agriculture or food processing. This article stipulates that *“If an employer predominantly operates on a seasonal basis, he or she may conclude fixed-duration labour contracts for permanent seasonal jobs to provide for the performance of these permanent seasonal jobs”* (Government of Croatia, 2022).

Essentially, this article treats the seasonal worker not as an occasional contractor, but as a permanent collaborator with a seasonal cycle, guaranteeing long-term social benefits and a fair and detailed employment relationship from both parties. This is also what Albania is attempting to achieve, as expressed in the National Tourism Strategy, which states that by 2030 it is expected to enable the retention of the seasonal workforce to ensure their financial stability throughout the year (Ministry of Tourism and Environment, 2025).

“Tricks” within the social insurance scheme

While the Labor Code provides a general framework for employment relationships, it does not clearly address the specifics of seasonal work, causing seasonal workers to remain outside many of the benefits enjoyed by full-time and permanent employees.

Article 5, letter “c” of the Labor Code excludes from its application family work performed by persons living in a shared household with the employer. In many small family-run tourism businesses, this exclusion is often used as a justification to avoid formalizing employment relationships, evading contracts and social insurance. This creates a “grey zone” of interpretation, where the absence of a contract turns family members’ contribution into unpaid and unprotected work. As a result, this category—although they may spend a lifetime working in their family businesses—does not appear insured anywhere, leaving their inclusion in the social insurance scheme to be decided by the Council of Ministers (Labor Code of the Republic of Albania, 2024).

Social insurance is supposed to mandatorily protect all economically active citizens in Albania in cases of income reduction due to childbirth, old age, disability and loss of the family breadwinner. But what has happened so far is that workers employed during the season benefit from social insurance only for the period they are employed—meaning a maximum of 3–4 months a year—leaving them uninsured for the rest of the year if they cannot find another job. According to Article 6, letter c, *“Social insurance provides compulsory protection to all employed persons in the event of loss of income due to temporary incapacity caused by illness, work accident, occupational disease and unemployment. The Council of Ministers may decide on other areas of protection, as well as exemptions for: c) unpaid family workers of self-employed persons”* (Law 7703, On Social and Health Insurance, p. 2).

Another serious consequence is the inability to benefit from paid annual leave. The law provides that this right is earned in proportion to the period of employment, which in itself automatically excludes the majority of seasonal workers, who usually work for shorter periods. *“The duration of annual leave is no less than 22 working days during the following working year...”* and *“When the employee has not completed a full year of work, the duration of paid annual leave is determined in proportion to the duration of the employment relationship. Periods of temporary incapacity for work are considered as working time.”* (Parliament of the Republic of Albania, 2024, p. 30). This makes their employment relationship even more unstable, directly affecting their physical and mental well-being.



2. METHODOLOGY

This chapter provides a detailed overview of the methodology used in this study, including the research approach, sampling, data collection and analysis methods, study ethics, etc.

2.1 Method used

This study employed a mixed method (survey and interview), with the aim of identifying not only the situation in which seasonal workers find themselves, but also understanding their experiences during their employment period in the coastal tourism sector.

The study population, as the total number of cases that could be included as research subjects (Matthews & Ross, 2010), consisted of seasonal workers employed in the tourism sector in the coastal areas of Shëngjin, Durrës and Vlorë. This category was chosen as the research subject due to its important role in the functioning of tourism activity during the summer season, as well as the numerous challenges that accompany it, ranging from working conditions to the lack of legal protection.

For this study, official statistics from the State Labour and Social Services Inspectorate (ISHP-SHSH) were taken into consideration, with the population of all three coastal areas for the year 2024. Specifically, Shëngjin (Lezhë inspection area) with 558 employees, Durrës (Durrës inspection area) with 2329 employees, and Vlorë (Vlorë inspection area) with 707 employees. (Annex 1)

Regarding the sample selected for this study, for the surveys conducted, it was entirely random. During the fieldwork we managed to conduct 242 surveys out of the 300 planned. Survey participants were:

- 39% women and 61% men.
- 54.5% from Durrës, 35% from Vlorë and 10.5% from Shëngjin.
- 60% were residents of the coastal areas where they worked, and 40% came from other cities to work in those areas.
- 66.5% were waiters/bartenders, receptionists, salespeople, etc., 16.5% were cleaners, assistants, guards, etc. 7.5% were cooks, 7.5% were managers and 2% were other roles.
- 64% were 18–25 years old, 18% were under 18, 14% were 26–35 and 4% were over 35.

Additionally, 25 seasonal workers were interviewed out of 30 planned interviews, of whom 11 were women and 14 were men, including both local residents and workers who required accommodation. The interview participants represented different roles within the tourism sector, which enabled the construction of a diverse panorama of their experiences and challenges.

To ensure the reflection of diversity based on gender, age, residency status and job position, heterogeneous sampling with maximum variation was used. This sampling method makes it possible to identify common themes that occur across all cases. (Matthews & Ross, 2010)

Structure of the interview and the survey

In this study, the instruments for data collection were the survey and semi-structured interviews. This interview format consists of predefined questions and sufficient space to allow participants to express themselves freely about their experiences, offering flexibility with themes that emerge during the conversation and allowing for deeper exploration of certain issues when necessary (Matthews & Ross, 2010).

Specifically, the survey had 33 questions, 21 with alternatives and 12 other open-ended questions for short answers. The interview prepared in advance had a total of 30 questions.

The structure of the interview and the survey was each divided into five main sections, designed to uncover the most important aspects of the seasonal workers' experience. The first section included basic information on age, gender, job position and residency status. The second section addressed general working conditions, including working hours, payment and overall daily workload. The third section focused on safety and accommodation, exploring access to adequate living conditions and workplace protection.

In the fourth section, the questions were related to the legal dimension of employment, including contracts, the level of informality and social insurance. The fifth section was dedicated to protection and union organization, exploring participants' knowledge of state institutions and the role of trade unions in protecting their rights.

2.2 Data collection and data analysis

Data collection

The data collection period lasted from July to September 2025. Priority was initially given to the surveys in order to gain a clearer overview of the tourism sector, and afterwards the interviews were conducted. Contact with participants was carried out entirely during fieldwork, where we were able to identify workers from different sectors of tourism for the interviews.

The surveys were conducted face-to-face with seasonal workers near their workplace, while the interviews were carried out in more suitable spaces, away from the work environment. Each survey lasted on average 4–5 minutes, while each interview lasted on average 40–45 minutes and was recorded with the full consent of the participants, to ensure accurate and complete transcription for the analysis process.

Data analysis

The data analysis process began with extracting the information gathered from the surveys conducted with the workers. By compiling the data according to each question, we were able to identify and cross-tabulate possible variables with one another.

Next, we continued with the transcription of the recorded interviews. Each interview was carefully listened to and transformed into written text, enabling a return to the original data and avoiding loss or distortion of information. After transcription, the data were coded in order to identify the key ideas and meanings expressed by the participants. This process was carried out initially through open coding and then through axial coding, where the codes were grouped based on similarities to form broader categories. The next step consisted of comparing and combining the data obtained from both the surveys and the interviews.

Finally, the developed themes were directly linked to the study's research questions. This step made it possible to draw grounded and valid conclusions from the collected information. The analysis process was not limited only to the statistical data of the participants, but also included the interpretations and experiences that the workers themselves shared. In this way, the data analysis contributed to building a more complete and comprehensible picture of the reality of seasonal workers in the tourism sector.

2.3 Limitations of the study

This study faces several important limitations that should be taken into account when interpreting the results.

- First, the selected sample cannot be considered representative of all seasonal workers in Albania. The surveys and semi-structured interviews were conducted only in the coastal areas of Shëngjin, Durrës and Vlorë, limiting the ability to draw general conclusions about the situation in all tourist areas of the country.
- Another limitation is related to the reduced participation of workers. Many of them cancelled interviews at the last moment, mainly due to job insecurity, pressure from employers or fear of the consequences of expressing their opinions freely. Likewise, physical fatigue, long working hours and the fact that the surveys and interviews were conducted at the peak of the tourist season significantly reduced their willingness to participate.
- During fieldwork for conducting surveys, one limitation was the poor access to large resorts, particularly in kitchen departments or among cleaning staff, creating a significant discrepancy in the number of surveyed workers between cleaners, cooks, etc. and workers such as waiters, bartenders, etc.
- From a methodological perspective, the use of non-probability sampling in the surveys created the risk of bias. Self-selection by participants may have favoured those workers who had stronger opinions or felt less at risk. At the same time, the risk of non-response implies that the voices of workers who were more insecure or more vulnerable to employer pressure may not have been represented. These elements limit the study's ability to provide a fully balanced overview of the reality.
- Finally, a notable limitation relates to the lack of literature and official data on seasonal work in Albania. This made it impossible to compare the findings with similar studies and limited the theoretical basis of the analysis. Moreover, the difficulties in obtaining data from state institutions created a gap between the reality experienced by workers and its reflection in official documents. This gap limits the study's ability to offer a complete and comprehensive panorama of the situation of seasonal work in the tourism sector.

2.4 Ethics of the study

In this study, the ethical aspect was treated with particular care. Before starting each survey and interview, participants were clearly informed about the purpose of the study, the topics that would be addressed, and the anonymous nature of their participation. The confidentiality and privacy of the data of all interviewees were emphasized and fully respected.

Furthermore, during the interviews, the possibility of involving minors was also encountered, ensuring that the interviews were conducted in the presence of one of their parents.



3. ANALYSIS OF THE SURVEYS AND INTERVIEWS

What is the most powerful employment network during the season?

As mentioned above, the government's strategy is to address the gap that exists in the labor market for seasonal workers through educational institutions, both secondary and higher. The reality so far appears to be very far from what the government aims for, as none of the respondents come from these institutions, and the way they have found their job is mainly through personal contacts and networks. **About 81% of respondents state that they found their workplace through relatives and friends**, 10.5% say they found it online (web or social media), and 8.5% returned to a previous employer. From this, we understand that the most powerful and successful employment network is the circle of family and friends. Another interesting and valuable element in the long term is the return to the previous employer, as this creates stability.

It remains to be seen how the government will increase the number of employed seasonal workers from 0 (this figure is based on the data collected through the survey) to 30,000 in the next five years through educational institutions.

3.1 Informality

Employment contract

68.42% of respondents did not sign an employment contract during this season, which creates greater insecurity in the workplace by classifying them as informal workers, with all the consequences that may arise at work: unpaid overtime, unpaid health and social insurance, unsafe working conditions, leave, etc. These issues will be revisited in more detail and supported with workers' testimonies in the following chapters.

Even those respondents who signed a contract but **did not receive a copy of it (13.68%)** remain uncertain about their job position, salary, overtime, or what steps to take if they want to complain or report violations of their rights at work. Nevertheless, this makes the employment relationship insecure and non-transparent. Not having a copy of the contract does not make the employment relationship illegal, but it still reflects a lack of transparency in the employer-employee relationship.

From the interviews conducted in the field, we understand that almost all workers are without an employment contract and that they agreed verbally about the job position before starting work or in a café. This is because they had previously worked in the same workplace or were family members, and the job was obtained through mutual trust. However, it seems that this trust leaves room for employers to abuse their employees in the workplace. Nevertheless, there

Do you have a written contract?

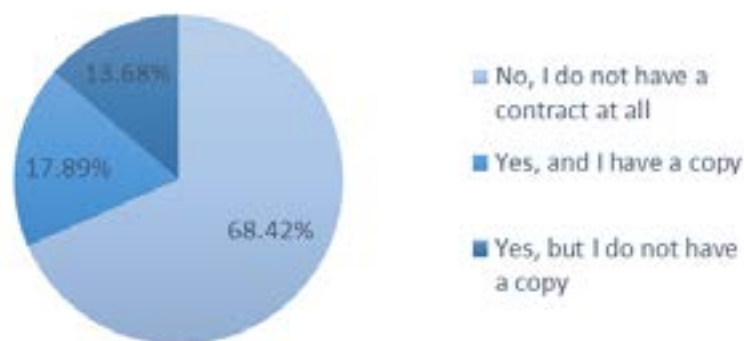


Chart 4

is also a very small portion of respondents who stated that they do not have an employment contract, but it was also their preference to work informally, since they may perform two jobs or find it more beneficial for the social security contributions to be added to their wages. Thus, we understand that there exists a culture of working informally and avoiding social security payments.

"I don't have a contract at all, not just me, but none of us there. We agreed on everything verbally. ...I gave my word that I would work with him and then I didn't leave. Because that's how it is, once you give your word."

"No, not at all, I am without a contract. We agreed only verbally, at home, since we are also cousins."

What about underage workers?

From the survey data collected in the field, we understand that there are workers **under the age of 16, and all of them (100%) are without a contract**, while in the **17–18 age group, around 85% are without a signed contract**. Similarly, the interviews show the same trend. Workers are employed without a contract, and in their case, it is their family members who decide on the workplace. This leads to the violation of the Labour Code in every sense, both by employers and by the state, which exercises extremely shallow control over these entities, thereby endangering minors in the workplace.

"No, I have not signed an employment contract. My dad agreed verbally with the owner."

In seasonal work conditions, which are characterized by high demand for labor and increased workload, it is important that the employment relationship is regulated from the outset through a written contract. This is not only an important aspect for the legal security of both parties, but also **a direct legal obligation specified in Article 21 of the Labor Code**, where it is clearly emphasized that *"The employment contract is concluded in written form..."* (Labor Code of the Republic of Albania, p. 13). This contract serves as the basis upon which employees can claim their rights.

Employment for short periods in a specific place, accompanied by a high intensity of workload, contributes to deepening negligence and the lack of willingness by employing entities to respect the provisions set forth in the Labor Code of the Republic of Albania. Seasonal work, in itself, does not constitute part-time employment; it represents a form of employment limited in time, lasting several months, and in terms of requirements and responsibilities, resembles full-time employment — often with even higher intensity and greater insecurity regarding its continuity.

Another factor that contributes to increasing the level of informality and under-declaration is the temporary nature of the season, which encourages some entities to maximize profits by avoiding legal obligations toward employees. Although seasonal work presents special characteristics, as highlighted in the first chapter, Albanian legislation does not contain a specific provision — neither in the Labor Code nor in a separate law — that regulates it in a specific manner. Despite this normative gap, the legislation in force clearly stipulates that an employment contract must be concluded for every employment relationship, even if it is temporary, and it must be signed by both parties.

Health and social insurance

Of the respondents who have signed a contract, regardless of whether they have received a copy of it or not (graph 5), **73.33% of them have their health and social insurance paid**. What is worth emphasizing is that **20% of them are not aware whether their social and health insurance** is being paid.

But even though they have not signed a contract (graph 6), from the survey we understand that **32.31% of the respondents have their health and social insurance paid**. This is considered a **partial informality**. You cannot complain anywhere about the conditions under which you work or if you work more hours than agreed, but this insurance is valid in cases of accidents and for the calculation of years of work by social insurance.

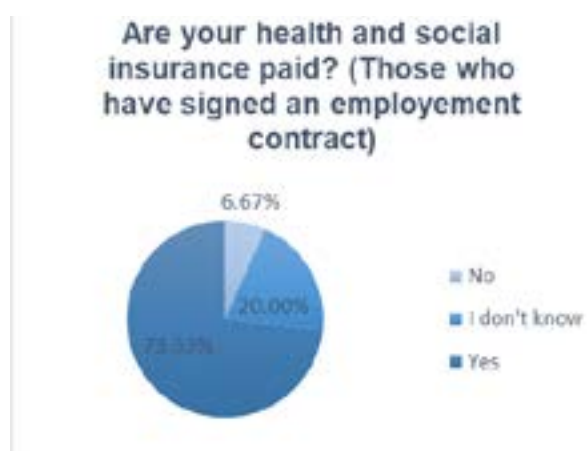


Chart 5

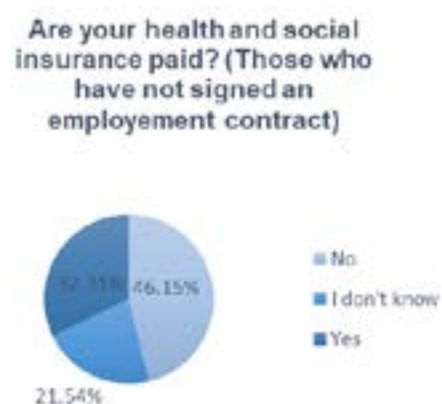


Chart 6

From the interviews, even though the overwhelming majority do not have a written contract, half of the employees during this season stated that **their health and social insurance is paid, even if not fully**. It is continually discussed that only the insurance for the minimum wage is paid. There are accounts that the insurance may have been paid for at least one month or that the insurance started to be paid only when the labor inspectorate or tax offices carried out field inspections and **the businesses were penalized with fines**.

“Not because they wanted to insure me, but because the tax officers come here almost every day, and since they left me almost always alone, they felt obliged to insure me so as not to be penalized with a fine. Until they insured me, they handled it in their own ways: ‘with a coffee.’”

What is most concerning is **the lack of compliance with Law no. 7703**, “On Social Insurance in the Republic of Albania”, as amended, which by its very title highlights the great importance of ensuring that all employees are insured during their period of employment. Thus, the role of the State Labor and Social Services Inspectorate (ISHPSHSH) and the continuous workplace inspections regarding employment contracts and the mandatory insurance contributions that must be paid are also brought into question, in order to reduce the number of entities that hire workers without an employment contract and without making monthly health and social insurance payments.

Certainly, when informality is at the level of 68.42%, it also makes sense that **70.53% of respondents receive their full salary in cash**. What we observe is that in all types of jobs/professions in this sector, the method of receiving payment is almost the same. There are no major differences between waiters, cooks, cleaners, or managers in whether they receive their salary in the bank, in cash, or partly in the bank and partly in cash.

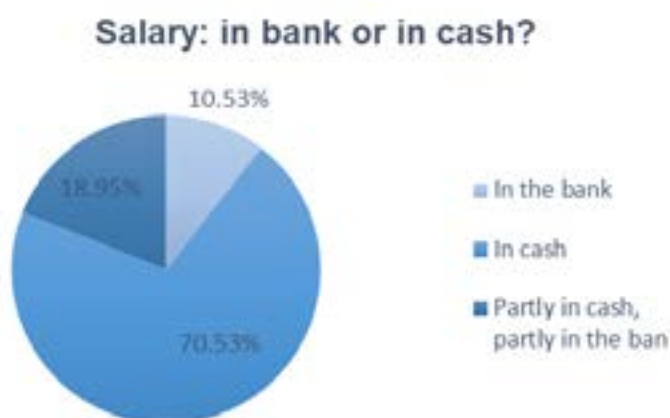


Chart 7

From chart 8, we understand that the lowest percentage—with only 23.36% of employees whose health and social insurance contributions are paid—receive their salary through the bank. Certainly concerning is the fact that **44.19% of insured employees still receive their full salary in cash**.

The same trend is also observed from the interviews, where more than half of the interviewees receive their entire payment in cash, while the rest receive part of their salary in cash and part

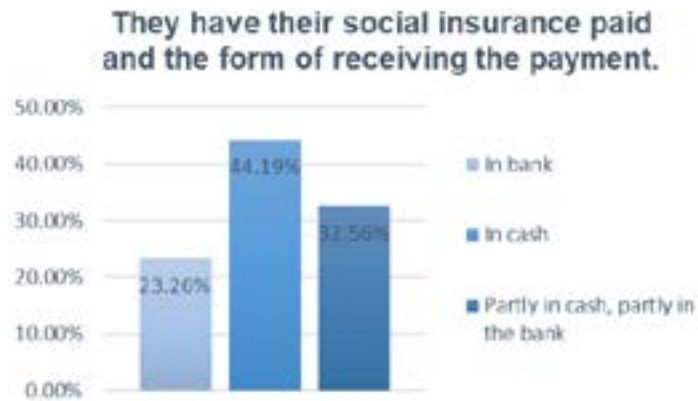


Chart 8

in the bank. Among the interviewees who receive part of their salary in the bank, they state that only a very small amount is paid into the bank compared to the real salary they receive. Mostly, **only the minimum wage is paid into the bank**. This comes as a maneuver by the entities to justify themselves before state institutions, but in fact it penalizes the employee regarding the social and health insurance contributions that rightfully belong to them according to the law. **Unfortunately, none of the interviewees received their full salary through the bank.**

“Mainly in cash; in cases when it has been paid through the bank, only the minimum wage was deposited in the bank, while the rest was given in cash.”

“I was paid the minimum wage and a small portion in the bank, around 15%, and the rest in cash.”

3.2 Working conditions for seasonal workers

For a job to be dignified, there are several elements that must be met, starting with the physical conditions of the workplace, which include hygiene conditions, acceptable levels of temperature and noise, work safety—meaning how secure you feel in a position over time—as well as working hours, salaries, etc. Through the questions from the surveys and interviews, we will try to understand and present the reality of seasonal workers by focusing on the issues and the most significant violations that we have identified during our research.

Season: time period, progression, and effects

The start of the season is officially considered to be May 1 and lasts until September 30. From the responses of the respondents, it emerges that **43.16% start work in June**. Meanwhile, with a similar percentage, **42.11% of respondents start work in May**. These percentages show that May and June are the months when the season practically begins. More specifically, those who start work in June and will work for 3 consecutive months carry the greatest weight with 32.63%. Among them, there are also employments in small numbers in the months of March, April, and August. However, what remains concerning is the fact that the majority of employees are employed only for a time period of 3 months, which is far from the claim that the season lasts 5 months. Furthermore, you may refer to the presented chart.

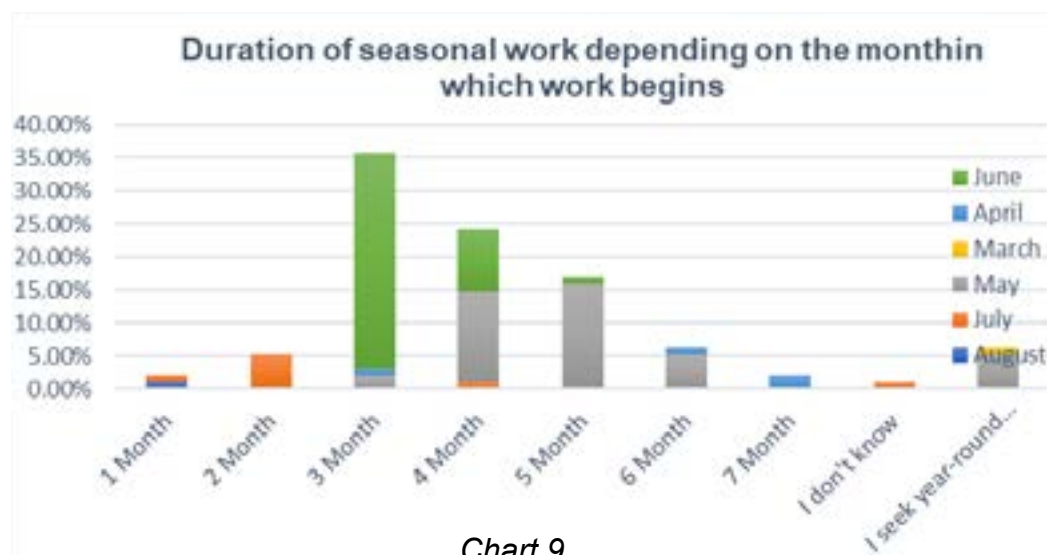


Chart 9

In this situation, what we have taken as testimony from the interviewees is that in cases when the season fails to meet the employer's expectations, this brings direct effects on the employee, consisting mainly of layoffs, the end of the season before the agreed date, lower pay than what was agreed upon, as well as an increased workload which is handled by a smaller staff compared to the needs. This implies that despite the agreement, there is the possibility that the season may end earlier than planned, with pay different from what was foreseen. Thus, what we understand from the testimonies is that the season mainly lasts 3 months, but is characterized

by uncertainty regarding its end, as it is directly linked to the planned revenues. Moreover, the intensity of work may be many times higher compared to what a worker can handle.

“With months no, but he removed 3 workers due to the lack of the anticipated workload. This brought a burden for us other workers.”

“According to him, it simply turned out beyond expectations, but for the better. Even though our conditions, those of the other workers and mine became worse. Only this, that most of the staff left and I was forced to perform several job positions.”

“For us nothing has changed this year, except that, if it can be called that, to justify the wage and the tips that were lower than he had told me at the beginning, he justified these with the decline of the season everywhere.”

How many hours per day and how many days per week are worked?

About 66% of respondents declare that they work more than 8 hours per day, among them, those who work 8 to 10 hours are about 24%, those who work 10 to 12 hours are about 28%, followed by those who work more than 12 hours and account for about 14%.

Only 5.26% of respondents state that they work less than 8 hours. The very high number of working hours is a central problem in seasonal work. According to the Labour Code, Article 90, work of 40 hours per week is foreseen, but it may also reach 48 hours per week with overtime for a certain period of time up to 4 months (Labour Code of the Republic of Albania).

In order to accurately analyze the long working hours, we must also consider the working days. In this matter as well, the situation is not optimistic, as approximately **95% of respondents state that they work 7 days a week**, meaning that for as long as the season lasts they have no day off at all; about 4% work 6 days a week and only 1% work 5 days a week. Here too, there is a serious violation regarding rest, as the Labour Code, Article 85, provides for weekly rest of 36 hours with 24 uninterrupted hours, mainly the day of rest being Sunday (Labour Code of the Republic of Albania).

If we make a simple calculation by comparing the working hours that a seasonal worker performs, 10 hours of work for 7 days a week, it turns out that in one week a seasonal worker works almost double the maximum amount of work that is allowed to be done in a week, even including overtime, that is 70 hours. If we make this calculation for one month, it results that a seasonal worker works 300 hours per month, exceeding even the average of 208 hours which is the standard according to the Labour Code, including overtime. Seasonal workers work **92 hours more than the norm per month**, and for at least **three months this reaches 276 additional** working hours on top of overtime, thus significantly exceeding the legally foreseen annual number of 200 overtime hours that could be performed in one year (Labour Code of the Republic of Albania).

Wages

Gradually, we move to what is also the main reason why these individuals have chosen to work in the season, which is wages. The level of wages varies, but **about 35% of respondents state that they are paid up to 50,000 lekë**. If we speak about this level of wage, then we are speaking of a lower wage level than the indicative wages, where the minimum wage is 55,000 lekë.

Meanwhile, 22% of respondents have a salary of 60,001–95,000 lekë, 17% have a salary of 95,001–120,000 lekë, 13% have a salary of 50,001–60,000 lekë, 6% have a salary above 120,000 lekë, and 7% have preferred not to answer.

If we put all the components together: working days, schedules, and wages, we will have such a situation (Chart 10).

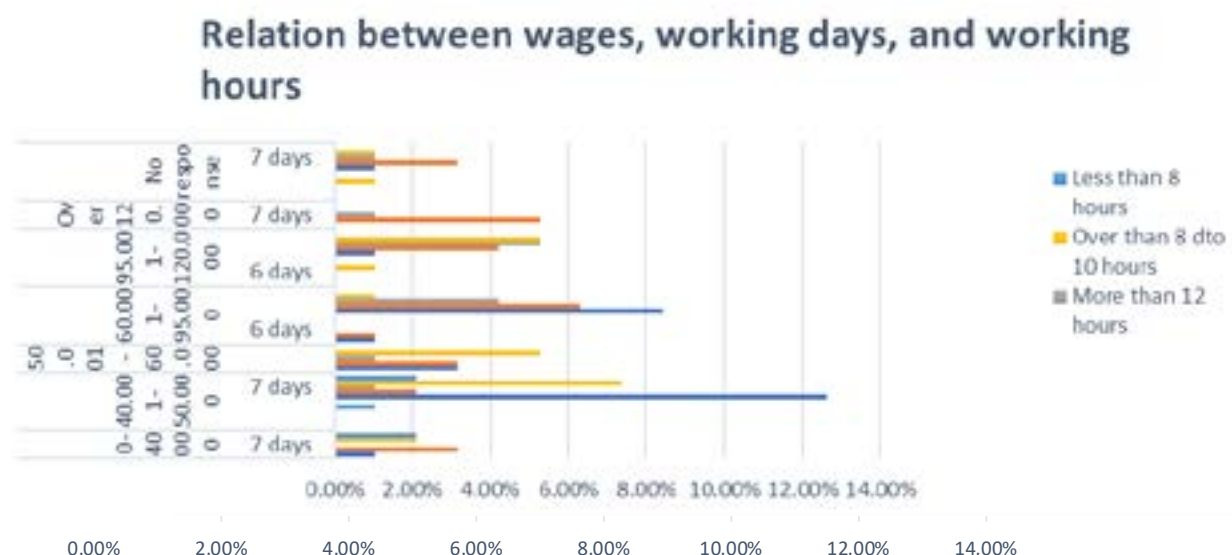


Chart 10

The first thing that stands out is that those at the lowest wage level work every day of the week, and the largest category that works **8 hours per day, 7 days a week is paid up to 50,000 lekë**. Thus, we are dealing with a situation where the myth that seasonal work is worthwhile because it has very high pay is gradually crumbling, when in fact seasonal work means working more and being paid less. Although it is obvious, it should be emphasized that seasonal work excludes compensation for overtime hours. In most interviews, it emerges that workers agree to extended working hours without requesting compensation in return, neither as normal hours nor as provided for by law.

What do workers in the tourism sector negotiate for?

When it comes to the initial agreement, workers were asked what they attempted to negotiate for their work during this season. Both from the survey and from the interviews, it is clearly understood that what they mostly try to negotiate is the wage.

“The wage, as I said at the beginning, I tried to negotiate for that small increase in salary, and that’s it.”

This question in the survey allowed the selection of more than one option; the majority, **around 59%, negotiated only the wage with the employer**. About 14% negotiated the wage, accommodation, and food, while around 13% negotiated all elements (wage, accommodation, food, and transport). This is followed by about 7% who negotiated the wage and transport, while around 1% did not negotiate anything.

As also expressed in the interviews, the initial reason why they work during the season is mainly linked to receiving a higher wage in a short period of time. For this reason, they give the greatest importance to wages. However, after wages, the need for accommodation is an important element, since around half of the interviewees are not residents in the coastal areas where they work. It is also understood that this is a period when expenses are minimal and the wage received serves as savings for the needs that this category has, where a good part of them cover school expenses.

The seasonal flow affects the relationship between employers and employees

The tourist season can be unpredictable and has its own fluctuations. But how well do businesses themselves manage to foresee these fluctuations, and how secure are workers under conditions where, as we saw, informality is very high? From the interviews, almost half of them expressed that this year there has been a decline in flow, and this has affected their workplace through staff reductions, lower wages, shortening of the season, etc.

“... due to the decline in flow, the hotel closed 20 days earlier and in the last month I received less than my wage, the same as the other workers there.”

“At the beginning it was thought that there was a lot of work and they hired staff for the entire hotel, but when they saw that the work declined, they dismissed the entire kitchen staff and part of the waiters. Me, whom they knew, they transferred to the upper hotel management, but the others were dismissed directly after 10 days.”

All these are indicators that a significant part of the burden of the decline in tourism falls on the current workers. The lack of staff or sudden reductions make these workers feel more overloaded during working hours, adding work beyond what was agreed at the beginning and, consequently, since wages do not change from the initial agreement, receiving lower pay in relation to the work performed. Furthermore, this brings insecurity about a sudden interruption of work, closing the establishment earlier due to the lack of clientele.

Minors

During the time we conducted field surveys, along the coastline we observed minors working, with some of whom we conducted surveys. Apparently, the great need for workforce has not spared minors from work either, also due to the fact that they are more easily influenced because of their age. In violation of the Labour Code, Articles 98 and 99, they stated that they have mainly worked without any day off and for more than 8 hours of work. We recall that for minors aged 16 to 18, only light work up to 6 hours is foreseen, while those younger than 16 cannot categorically be in the labor market (Labour Code of the Republic of Albania).

“I worked 7 days a week, 8 hours a day, with minimum wage.”

“This is my second year working in the season. I work 6 hours a day, 7 days a week. I have not worked overtime. Now that school has started, I work 5 hours. I started work on June 29 and will finish this Sunday (September 14). My wage is 35,000 lekë.”

It should be emphasized that this is a problem that stems from the lack of inspections that force establishments to comply with the law. On the other hand, for these age groups there are no incentives for career education programs or for the development of their other skills, especially during the summer when they are on school holidays.

Where is work better paid?

Every season it is said that the South has better wages compared to the central or north-western part. Based on the responses of the respondents, this appears to be somewhat true. Shëngjin is the city that has an interesting trajectory because it peaks in the 60,001–95,000 lekë bracket (even though it is modest in terms of participation percentage), but it has a distribution without major fluctuations, maintaining a certain positive balance in average wages. Next comes Durrës, which tends toward average to lower wages, having the highest percentage compared to other cities up to the 60,001–95,000 lekë bracket. Vlora, on the other hand, has an upward trend in wages of 95,001–120,000 lekë and above 120,000 lekë. But when viewed both in relation to itself and in comparison with other cities, it tends to have an increase in the percentage of wages above 60,000 lekë.

Although in very fine lines it is somewhat confirmed that Vlora pays more, in percentage terms regarding working hours it is Durrës. Summarized, we can say **that Vlora pays better, but more work is done in Durrës** (Chart 11).

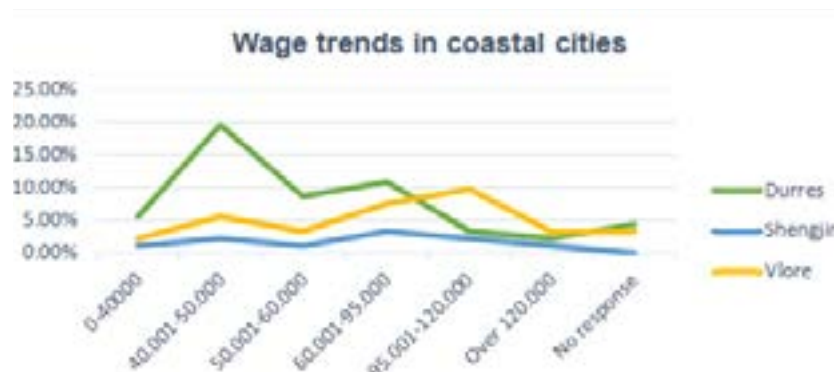


Chart 11

Which age group works in the season?

The seasonal labor market in coastal tourism appears to be a challenge that becomes impossible to cope with for everyone. The widespread perception is that students and very young people are the ones who can work during the season, and the truth is that **64% of respondents belong to the 18–25 age group**, 14% are 16–17 years old, 13% fall within the 26–35 age group, and 9% belong to the age groups under 16 and over 35. Clearly and distinctly, the season is carried by young people during their years of study.

Accommodation of employees during the season

During the tourist season in Albanian coastal areas, a significant increase in economic activity is observed, especially in the sectors of gastronomy, hospitality, and services. This requires a temporary mobilization of work infrastructure, which often includes the construction or temporary reassembly of buildings, premises, bars, and restaurants. Based on this situation, employers are obliged to ensure suitable and safe working environments for their employees. Another challenge that arises during the tourist season is the lack of workforce in coastal cities, which leads to the need for workers from inland cities or from abroad. This brings a series of consequences related to the need for accommodation, food, and integration into the workplace and the community.

The chart below presents the accommodation of seasonal workers and the types of structures that they or the employer have provided. **54.7% of respondents did not need accommodation** because they had their homes nearby or worked in the same city and returned to their residences by public transport or other means. Meanwhile, the remaining part needed accommodation and **were housed in different spaces (45.3%)**. Among them, 23.2% were accommodated in environments such as camps, houses, etc., 11.6% were accommodated in the structure where they worked, and 10.5% were accommodated in containers. The interviewees also state that, in general, the spaces where seasonal workers are accommodated are in unsuitable conditions and not at all livable.

“Unsafe, noisy, dirty space. It was a container that they had improvised as rooms and about 10 m², which I shared with 4 other girls.”

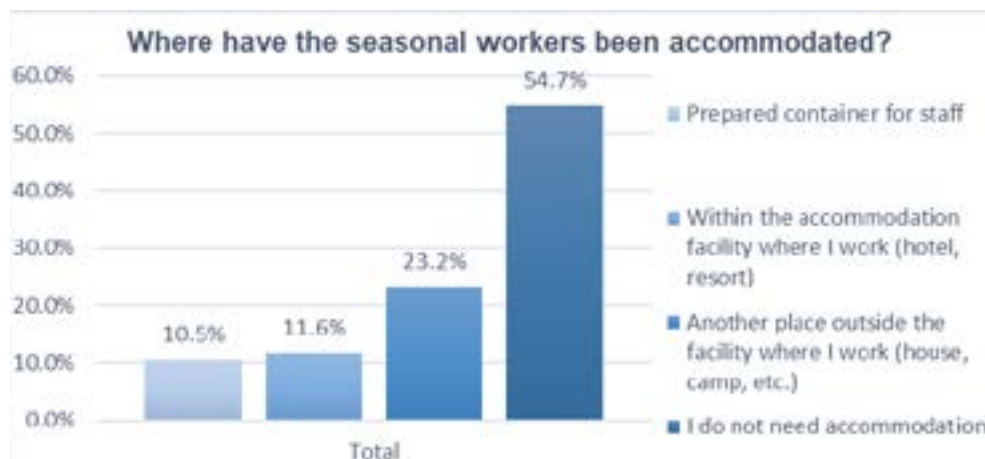


Chart 12

Regarding the size of the spaces where the surveyed seasonal workers are accommodated, we see that for the majority of them there are problems with space (not only because of the conditions, but also in terms of size), as a considerable percentage of them **(around 40%) live in less than 14 m²**. In contrast to some Western Balkan countries, such as Croatia, which through the policies of the Ministry of Labor clearly defines minimum standards for the accommodation of seasonal workers, at least 14 m² per person (Government of Croatia, 2022), Albania still operates with general and unclear provisions.

The Albanian Labour Code, in Article 73, states: “*Housing provided to employees by the employer must have acceptable hygiene and cleanliness, as well as toilets for men and for women*” (Labour Code of the Republic of Albania, p. 28). In general, many provisions of the Labour Code are formulated in a general manner, leaving room for different interpretations and failing to guarantee full protection of workers’ rights. This situation creates insecurity and ambiguity, especially for seasonal workers who are often in vulnerable positions.

To what extent is the obligation for drinking water and food respected?

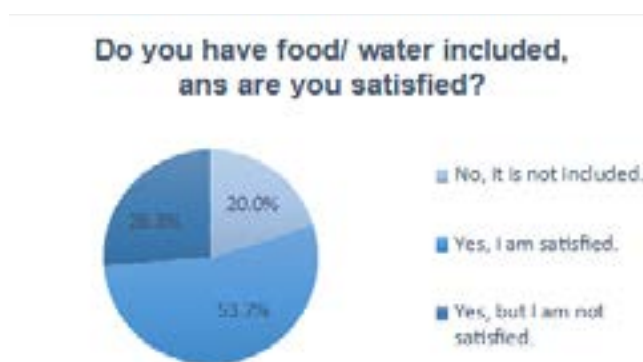


Chart 13

Regarding drinking water and food included during working hours, about **54% of them have them included and are satisfied**, 26% have them included but are not satisfied, and 20% do not have either water or food included.

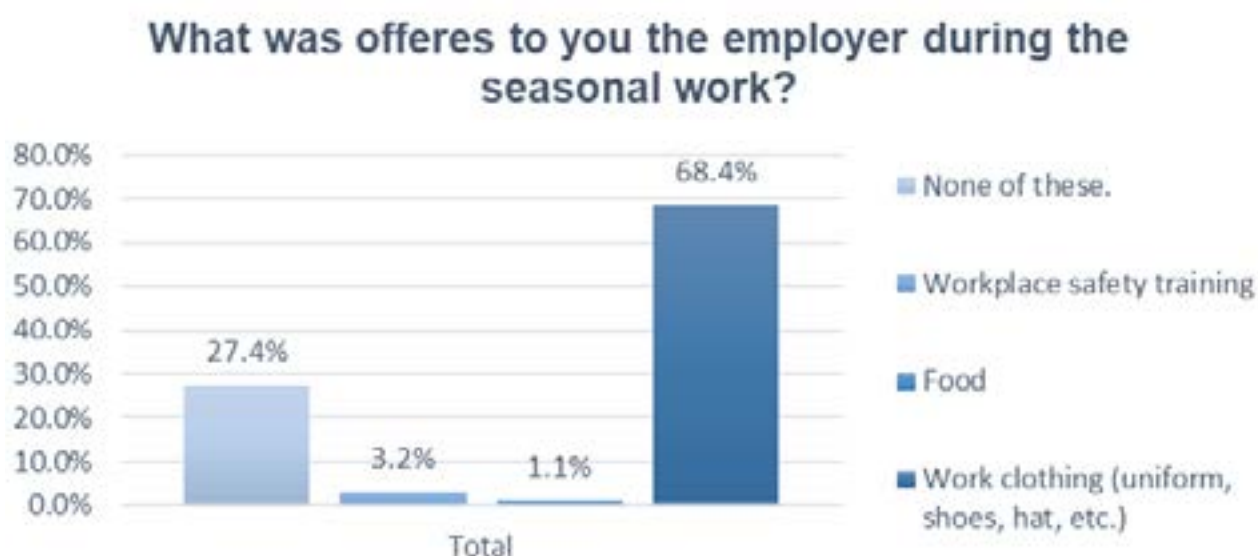
One of the few articles with clarity regarding working conditions is Article 69 of the Labor Code, which stipulates that “The employer must provide employees with drinking water, at least 6 liters per day per person” (Labor Code of the Republic of Albania, p. 27). This constitutes a basic requirement, especially during the summer months, when high temperatures significantly increase the need for hydration. From the interviewees as well, half stated that they are provided with food and water during the period of employment, almost half stated that they are not provided with food at all, and a very small portion stated that even though food is provided during the period of employment, they are not satisfied at all and do not take it.

“Yes, the food. Not only us who work in the kitchen, but also the rest of the staff.”

“I bring it with me, absolutely. They do not provide either bread or water to anyone, not just me. I take my bottle of water with me every day. Not only me, but everyone there does the same.”

Protective equipment and worker training

The chart below shows what protective equipment is provided to workers during seasonal work. 68.4% of them state that they were provided with work clothing such as uniforms, shoes, and hats. Meanwhile, **27.4% of them did not receive any protective equipment from the employer**. This is a high figure, as for job positions such as kitchen staff, sunbed workers, baristas, waiters, cleaners, bartenders, etc., uniforms, gloves, and hats are essential due to high temperatures, detergents used for cleaning, various accidents in the kitchen, and so on.



Grafiku 14

As for occupational **safety training, which is more than necessary, only 3.2% of respondents had it provided by the employer.**

This is a very low and at the same time worrying figure, showing that employers do not have a culture of training workers. Also, being untrained, workers in certain positions are paid less and are easier to dismiss due to the lack of the necessary qualifications for the job position they hold.

“Here, for example, a worker whom she hired at the beginning to wash dishes, and even that job she could barely do. ... So, this owner would have dismissed her from work at the beginning altogether, with the justification that she does not know how to do the job, but then not only does she keep her at work, but she is the worker who works the longest hours.”

So here, if I had not trained the worker myself, they not only had no intention of doing so, but they also insulted her, saying that she does not know how to work and that she does not want to work. But I also do this voluntarily, even though in the end the workers work for them, not for me.”

Stress in the workplace

Regarding stress in the workplace, **about 80% of the surveyed seasonal workers say they experience stress.** About 26% of them due to work intensity, 24% due to disagreements with staff/owner, 17% experience stress from unsuitable accommodation and food, about 6% from relationships with clients, 6% from job insecurity, and 1% from poor ventilation conditions. Since seasonal workers work only for a few months, are temporary, and their rights in our country are not implemented, **two of the highest stress percentages come from high work intensity and disagreements with the owner.**

“The relationship with the owner/managers has been bad. Besides not feeling valued and heard, I felt exploited. It was the worst experience; the owner and managers were offensive, had no good communication at all, held grudges and resentment if I expressed a problem or if there was a conflict about something.”

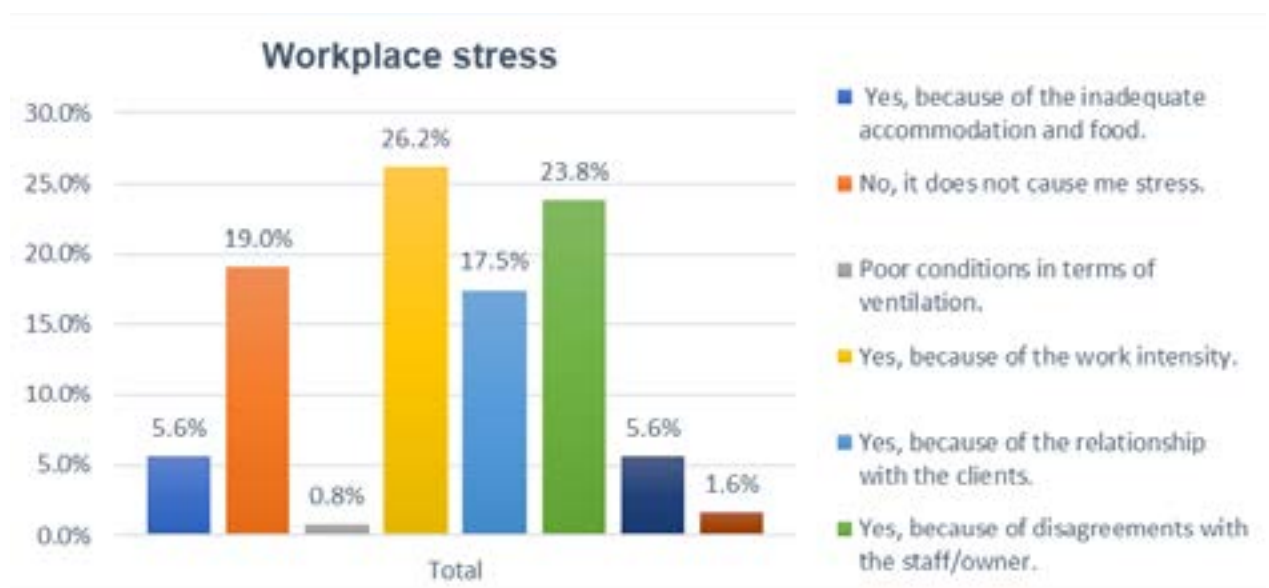


Chart 15

Sexual harassment in the workplace

Regarding sexual harassment in the workplace, the respondents indicate that in seasonal work both women and men experience sexual harassment, but with a slightly higher percentage among women.

16.67% of the surveyed women experience sexual harassment in the workplace. 11.11% experience harassment from clients and 5.56% from colleagues or employers. This is a very worrying figure, because in addition to fatigue and other problems at work, female workers also face sexual harassment during working hours. As for **men, 12.28% experience sexual harassment at work, 7.02% from clients and 5.26% from colleagues or employers.**

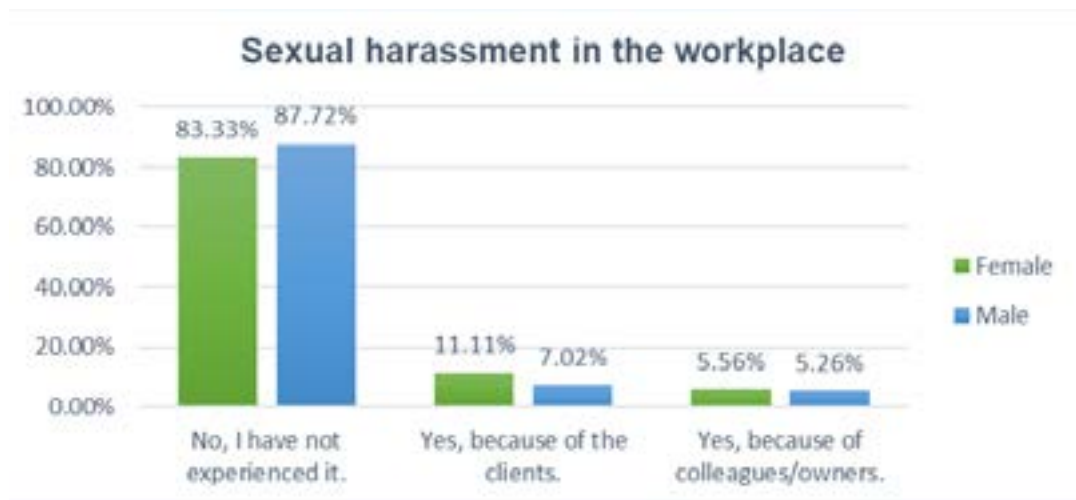


Chart 16

Inspections by institutions in the workplace

In every workplace there should be multiple inspections. We mention some of them, starting with the Labour Inspectorate, which has the duty to inspect the implementation of rules for the protection of workers. The Hygiene Inspectorate should be another controlling body; the National Food Authority (AKU) likewise to set standards on food safety. One of the institutions that has a very important role and that directly affects the reduction of informality and under-declaration of wages is the General Directorate of Taxation (DPT). Based on the indicative wages that this institution has issued, they should verify whether the guideline on indicative wages is being implemented, where it was stated that non-compliance would be a reason for increased inspections of entities that do not apply it. From the interviews conducted, it emerges that none of the interviewees, even when they become aware of the presence of inspectors, know which institution they are from, and in no case has there been a real inspection, but only the owner has been met and then they have left.

“When they come from Tirana, the owner has no information, while from Lezha he does. With food quality inspections they have been fine, but with insurance they have been bad. We act like clients or leave when they come.”

“Yes, there have been, but the owner was so powerful that as soon as the inspectors arrived he told them to wait. He seated the waiter at a table, and after the owner came and met them, they left without carrying out any inspection. From the beginning of the season we knew that they would come for inspection, but we did not know when, and in the end no inspection was carried out, they just met the owner.”

These are excerpts from representative interviews from the cities included in our study. Therefore, even this year there has been no serious attempt by institutions to punish abusers and to establish order.

3.3 Improving seasonal working conditions in tourism, protecting the rights of seasonal workers, and the need for representation

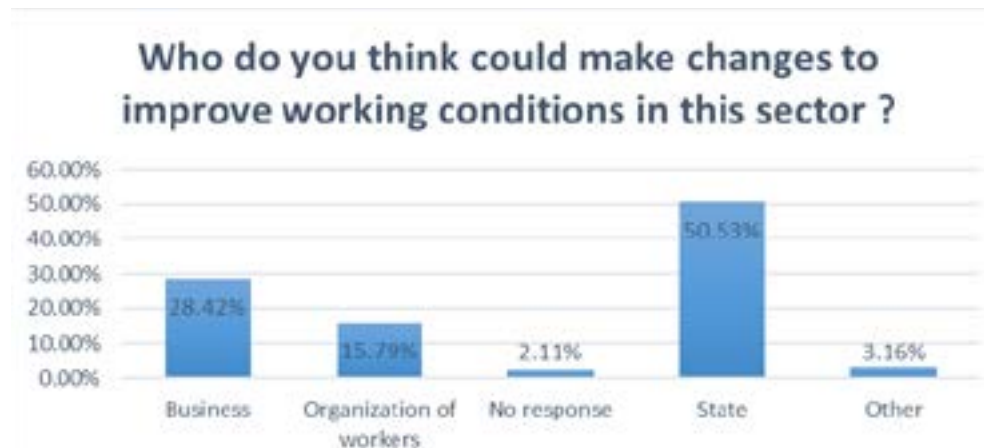


Chart 17

According to the data, half of the respondents (**50.53%**) **believe that the state has the main role in improving working conditions**, highlighting the importance of laws and regulations. 28.42% consider owners and businesses responsible for change, while a smaller share (15.79%) place their hopes on workers' organization, such as trade unions. The percentages for "other" and "no answer" are minimal.

The analysis of the interviews also shows that the state is the most important actor for changing workers' conditions, but the interviewees emphasize the lack of institutional support and the weakness of state inspection mechanisms, expressing distrust toward public institutions. Regarding the role of businesses, **interviews show that their interventions are possible at the managerial level, especially regarding schedules, the environment, equipment, and respectful treatment by the employer**. Employers should not focus only on reducing costs while neglecting workers' well-being. The organization of workers, according to the interviewed workers, is difficult to realize due to the small number of workers employed in businesses, the annual turnover of workers, job insecurity, lack of information, and above all because they do not feel the support of state institutions. Therefore, it appears that only a small portion of respondents believe in workers' organization as a solution to their problems.

"We do not trust any institution. The state and institutions should be for the poor, but in Albania it is completely different."

"For me, the most basic things are uniforms, hygiene, and not being insulted by the owner."

"... workers themselves need to be more informed about their rights and proper conditions."

From the combined analysis of surveys and interviews, it emerges that the majority of workers see the state and its inspections as the main factor for improvement, while collective organization is desirable but difficult to achieve. Owners can make small and direct changes, but without institutional oversight and worker awareness, the improvement of seasonal working conditions

remains limited. In general, the data show that improving working conditions requires the combination of three factors: institutional responsibility of the state, managerial behavior of owners, and the active participation of workers themselves in forming a new culture of work and solidarity.

Although only a part of respondents believe in workers' organization for improving their conditions, when asked whether they see representation as necessary for the protection of seasonal workers' rights, over 90% responded positively and over 70% also expressed willingness to be part of it (Chart 18). Interviews also show that representation is seen as an important tool for protecting rights, but also as a difficult process to realize, as seen in the analysis of Chart 17.

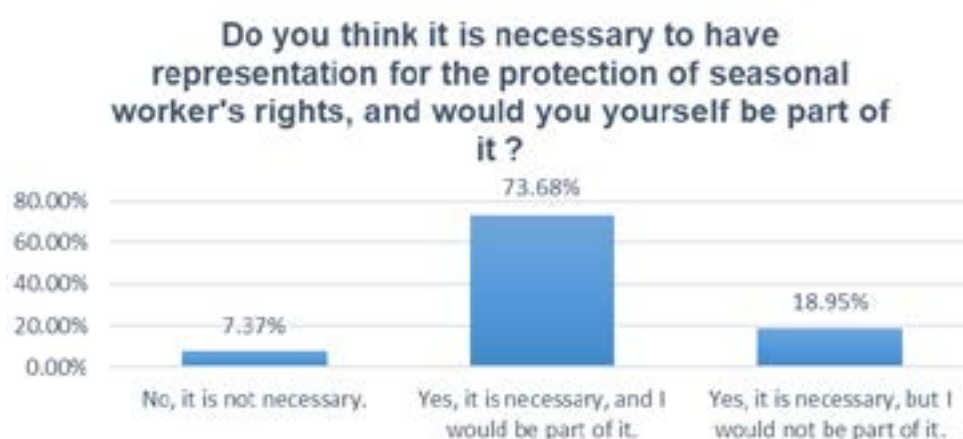


Chart 18

Workers consider their organization necessary and express readiness to become part of it; however, they perceive themselves as the least powerful actor to bring about change, especially compared to the state or businesses themselves. Moreover, organization is seen as an initiative with limited effect at best, while at worst it may be accompanied by the risk of losing one's job. Workers' statements show that, although they consider organization necessary, they feel unprotected and constrained in implementing it in practice.

"Organization is good, but we are a small staff, close to the owner."

"If you speak about rights, they remove you from work immediately."

Workers express support for organization but are skeptical of traditional trade union structures.

"There is nothing, no union for us. There has never been anything for workers' conditions."

"Of course organization is necessary, but these are the conditions... at the beginning they tell you whether you accept or not, if you want to come, come; if not, don't come."

It is worth emphasizing that most of the interviewed workers have never been part of a trade union or an organization that protects workers' rights. Some of them have been members of unions in other sectors (e.g., education or mining). The majority do not have clear information about collective organizations and the ways in which they can influence the improvement of working conditions.

The need for representation and willingness to engage in relation to age

The responses of surveyed seasonal workers who see workers' organization as necessary and express readiness to be members show that this depends on age. **Young people aged 18–25 (71.01%) are the most motivated group to protect their rights and to engage in representative organizations.** This may be linked to the fact that they are more connected to the seasonal sector, more flexible, and more open to collective action. The 26–35 age group (15.94%) shows moderate interest, as they may be influenced by family and economic responsibilities or negative experiences with such organizations. The group over 35 years old is dissatisfied or uninterested, which may reflect fatigue, previous failures, or the perception that collective efforts do not yield results. From the data, we understand that the greatest potential for organization is found among young people.

Workers' satisfaction with wages and working conditions in relation to the need for organization in the workplace

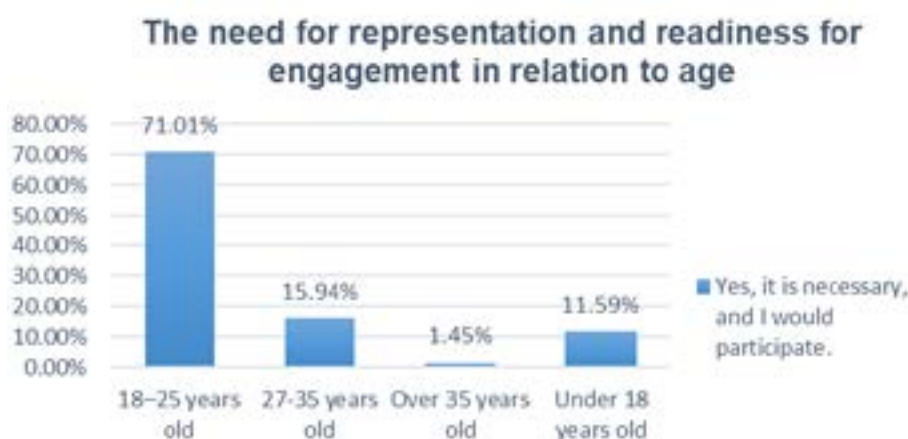


Chart 19

What is observed is that respondents who express higher satisfaction with their job or working conditions express less need for the organization of seasonal workers. This result suggests that the perception of the need for representation is linked not only to interest in collective engagement, but also to the level of personal satisfaction with existing conditions. For workers who are satisfied, it may be that they feel sufficiently protected or represented, while those who express lower satisfaction or dissatisfaction are more motivated to engage in organizations and to seek improvements.

The majority of respondents, especially those less satisfied with wages, think that representation is necessary. The highest percentages, over 80% for the option “Yes, it is necessary and I would be part of it,” are found among workers who are not at all or only somewhat satisfied. This shows that the lower the satisfaction with working conditions, the stronger the desire to become involved in representative organizations.

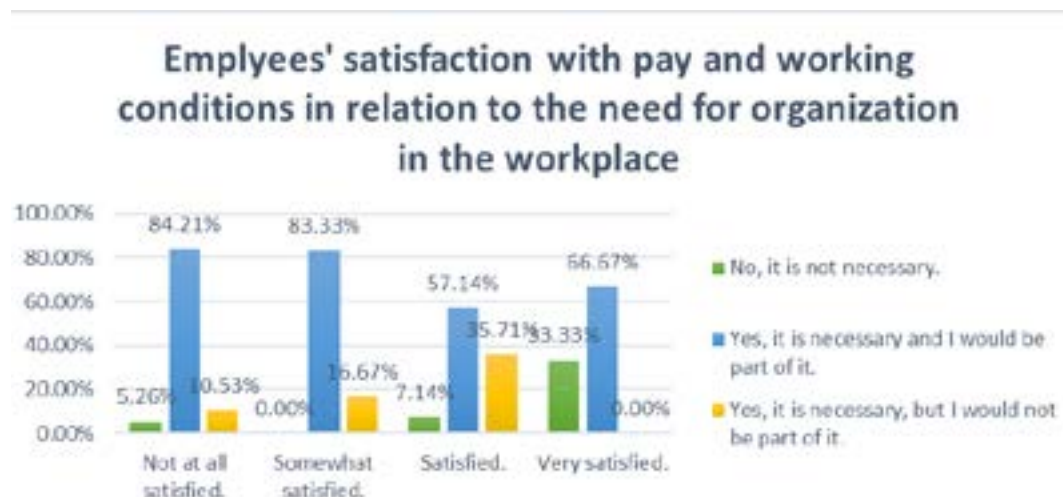


Chart 20

Work outside the season

The questionnaire also shows that 59.57% of workers do not expect to have difficulties finding work after the season, while **40.43% of respondents anticipate difficulties in finding work outside the season**. This shows a clear division: some workers are more confident in their skills and professional network, while others face insecurity and real barriers in the labor market. Workers who face difficulties represent the most vulnerable segment of seasonal workers.

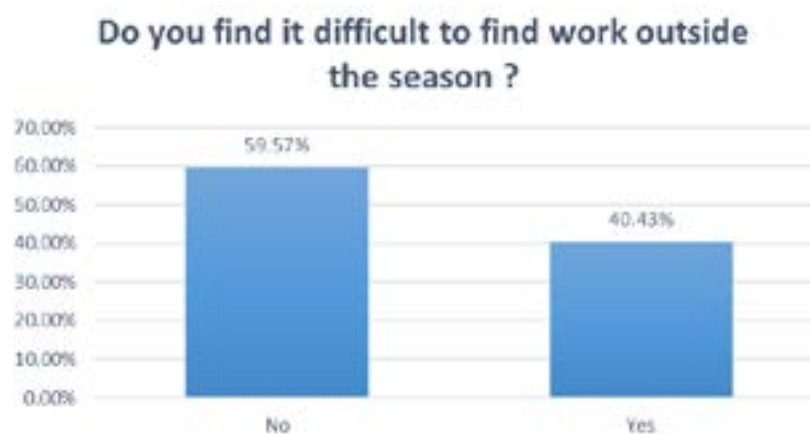


Chart 21

What work do you do outside the season?

From the analysis of the data in Chart 22, which illustrates the distribution of seasonal workers' employment outside the tourist season, it emerges that 36.84% of respondents remain unemployed, reflecting high insecurity in the labor market. A significant share, 28.42%, work in the service sector, while 15.79% are pupils or students, limiting their employment opportunities outside the season. Professions requiring higher education represent 6.32%, construction/manual work 5.26%, sales/trade 4.21%, garment manufacturing, 2.11%, and other activities only 1.05%.

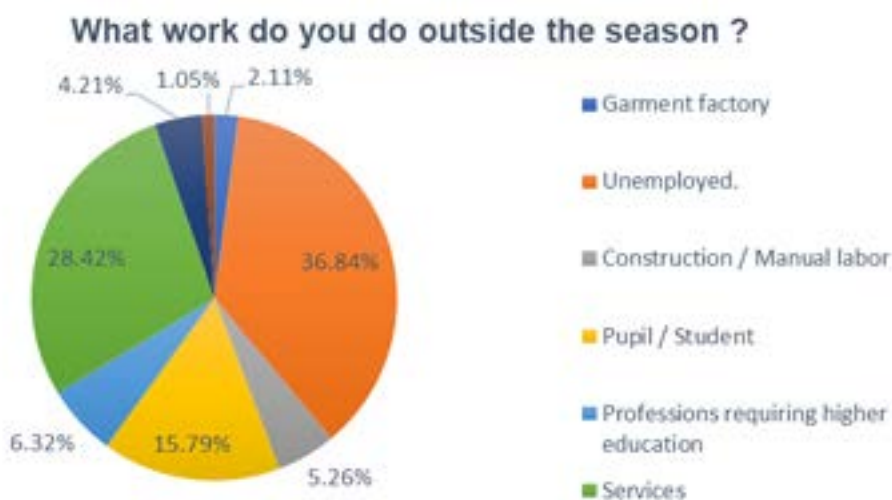


Chart 22

The analysis of the interviews also shows that seasonal workers face high insecurity outside the tourist season. Many of them have difficulty finding work due to the lack of job opportunities, as well as poor working conditions and low wages. Many young people who are in school or university work only during the season to earn income needed for their education. A small share of workers have easier access to employment due to experience or professional specialization.

"I work three months in the summer and then I stay at home. I have looked for work in the city, but they don't take you for just a few months."

"Yes, it will be very difficult for me because as soon as I tell them that I come from seasonal work, they don't hire you because they fear you will leave again for the season."

"In winter I return to Tirana and work in a café. The salary is lower, but it's better than staying unemployed."

How difficult is it for seasonal workers to find work outside the season?

The data show that the type of work people do outside the season directly affects how easy or difficult it is to find work afterward. In sales/trade, the situation appears more problematic: the majority (around 75%) say they find it difficult to get work after the season, which shows that this sector depends heavily on the seasonal flow of tourists. A similar trend is observed in construction and physical labor, where around 60% of those working in these professions face difficulties after the season, reflecting the unstable rhythm of work throughout the year. The situation is different in services and professions requiring higher education, where more than half of respondents say they do not have difficulty finding employment after the season. This suggests that these categories offer more stable opportunities and are less dependent on the summer season. The difficulty of finding work after the season is closely linked to the nature of the profession: the more it is tied to tourism and seasonality, the greater the insecurity; the more it requires stable skills, the easier it is to find work throughout the year.

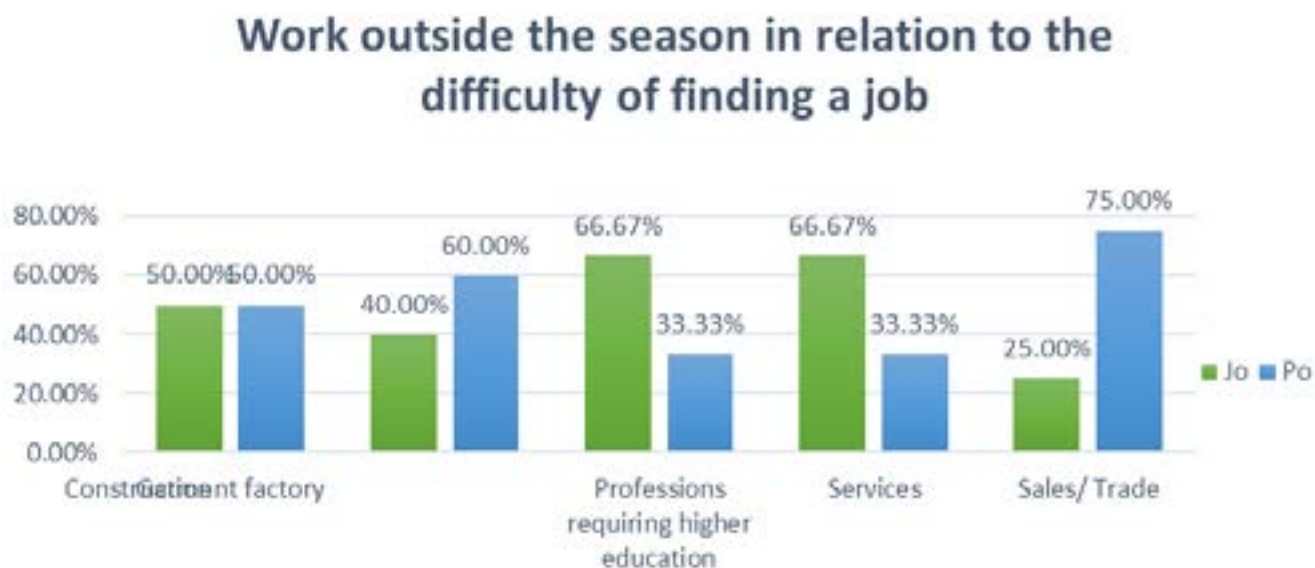


Chart 23²

In summary, we understand that seasonal workers are mainly young people who rely economically on tourism only during the summer season. Some of them continue to work in similar sectors or in other professions outside the season, showing flexibility and adaptability, but the majority face difficulties in securing stable employment. This situation underlines the importance of organizing and representing seasonal workers in order to protect their rights and increase access to employment opportunities outside the season.

² In this chart, the first two columns belong to the “Garment manufacturing (Fasoneri)” category, and the next two columns belong to the “Construction” category.

A 3-month season or a 6-month season?

67.37% of respondents state that they would prefer a more intensive season (3–4 months) with higher pay only for that period, while 32.63% would choose to extend the season to 6 months. This result shows that the majority of seasonal workers aim for immediate earnings and work intensity rather than long-term stability. This tendency is closely linked to their profile, mainly young people and students, who see the tourist season as an opportunity to secure additional income for a few months, without necessarily linking it to a future career.

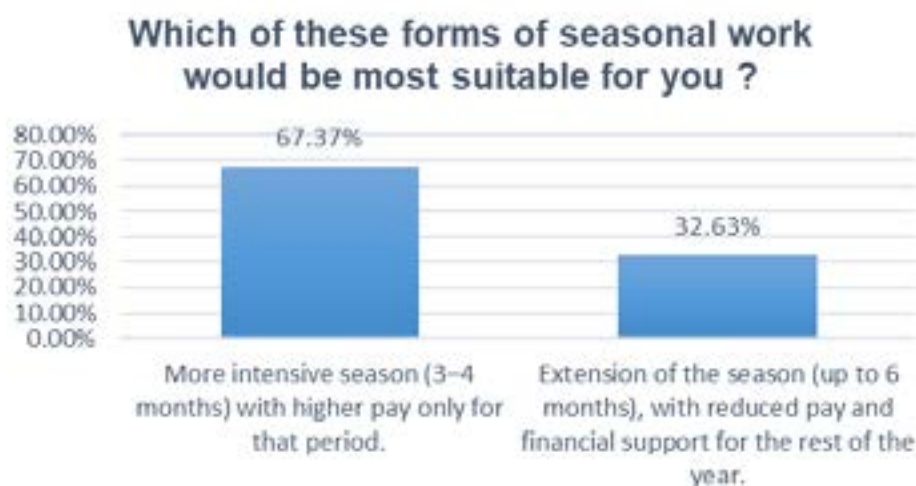


Chart 24

In the interviews conducted, this tendency clearly emerges in several statements. Some workers express that seasonal work is more worthwhile when it is concentrated in shorter periods with higher pay.

“If the job is well paid, it’s better to work hard for a few months and then have time off.”

“In summer you get very tired, but it’s worth it because you earn more in a short time.”

These attitudes align with the general tendency of 67.37% of respondents, who prefer short-term economic intensity over long-term stability. However, the group of 32.63% of workers who prefer extending the season represents another way of thinking. They seek security and income stability, even if this implies a lower monthly wage. This is also confirmed by the interviewed workers themselves.

“It would be better to extend the season, even with less money, because at least we wouldn’t be without work all winter.”

“Continuous work gives you security; you don’t have the stress every year of wondering where you will work after August.”

In conclusion, the analysis shows that employment policies in the tourism sector should take into account these two different tendencies. A balanced approach, which offers opportunities for decent pay during an intensive season, but also financial support or training outside the season, would help improve the conditions of seasonal workers and create a more sustainable labor market.

CONCLUSIONS

- **Tourism is developing, but workers continue to work long hours, under insecure conditions and with wages that do not justify the intensity of work.** The growth of the sector does not translate into security, stability, and well-being for seasonal workers, despite their contribution to output. This indicates the lack of a sustainable development model that places human resources at the center and would bring benefits and long-term stability to the sector, given that many elements are linked to human resources.
- **The labor market in coastal tourism faces shortages and an unqualified workforce.** Poor working conditions and seasonality make jobs appear transitional, and those employed in this season are a limited target group, mainly students.
- **The labor market fails to attract young people who have completed secondary or higher education in hospitality and tourism.** The National Tourism Strategy 2025–2030 projects an increase in employment from 43,000 to 72,000 graduates from these institutions, but does not foresee concrete steps on how this can be achieved, again leaving the integration of students into the labor market unresolved.
- **The tourist employment season lasts on average 3 months,** which is too short a period to bring productivity and stability to workers.
- **In Albania, there is a lack of a specific legal framework for seasonal employment,** which creates insecurity and unequal treatment for seasonal workers.
- **Informality in seasonal tourism employment is extremely high.** About 68.5% of surveyed workers do not have a signed employment contract, leading to legal insecurity. Verbal agreements have become a culturally accepted norm, reproducing year after year the lack of legal protection.
- **Almost half of workers receive their wages entirely in cash and are not included in the social insurance scheme.** A very high percentage of employees are completely without social insurance, while many others are declared with insurance only at the minimum level set by the state. This is also reflected in the fact that most receive only the minimum wage through the bank, while the rest is paid entirely in cash.
- **Very long working hours and no weekly rest.** This is a challenge and difficulty faced by workers and discourages others from pursuing a life centered on work.
- **Wages are very low compared to the amount of work,** considering also the lack of compensation for overtime and the difficulty of reintegration into work. Wages earned during the season are insufficient to cover living expenses throughout the year, making this market unattractive and seen as transitional rather than a profession.
- **Minors are employed during the season and are exposed to violations of the Labor Code.** Data from surveys and interviews show that all employees under 18 work without contracts and are often placed by family members. As a result, they are more exposed to abuse, long working hours, and workplace risks.

- **A decline in tourist flow falls on workers.** A decrease in workload during the tourist season has consequences for workers, especially those without employment contracts. These workers are the first to be penalized through reduced hours, wage cuts, and dismissals without notice.
- **Accommodation and living conditions are inadequate and below minimum standards.** Many seasonal workers live in small, unsafe, and unsuitable spaces (even in containers), while Albania lacks clear legal standards for minimum surface area and accommodation conditions, unlike countries such as Croatia, Lithuania, etc.
- **There is a lack of protective equipment and worker training in the workplace.** Some workers do not receive protective equipment and almost no one is trained in occupational safety; moreover, the Labor Code remains insufficient and too general, exposing workers to risks.
- **The work climate is tense, with high stress levels and alarming cases of sexual harassment.** About 80% of workers feel stress from work intensity and conflicts with managers or employers, while sexual harassment is reported by a worrying percentage of both women and men, showing a lack of seriousness in protecting workers' dignity and safety.
- **Institutions do not play a regulatory role in the labor market,** leading to flagrant violations of rights. This is one of the reasons violations occur openly. Workers see the role of the state as decisive for improving working conditions, but trust in institutions remains low.
- Collective organization is seen as necessary but almost impossible in practice. The majority of workers see the need for a representative structure, and more than half of them are willing to participate. However, they feel unprotected in making it a reality due to fear of losing their jobs, small staff sizes, lack of information, and lack of institutional support.
- **Life outside the season is insecure and unequal.** About 37% remain unemployed in winter. The type of profession outside the season strongly affects the difficulty of finding work. Those working in trade, construction, and physical labor are more exposed to insecurity, while service workers and professions requiring higher education have more stable access to employment.

RECOMMENDATIONS

- Conduct a detailed market study and select a sustainable tourism development model that takes into account environmental protection, community empowerment, and accessibility of the tourism offer to all social groups.
- Draft and approve a Seasonal Work Status. This status would provide solutions for employment through financial support for workers during off-season months, amounting to 80% of the minimum wage, as well as guarantees for secure employment the following year in the same workplace. It would also ensure stability, opportunities for professional growth, and the possibility of long-term employment. This measure would encourage young people to study in vocational institutions for hotel and tourism management with the perspective of employment after graduation. With more qualified employees, service quality increases, directly attracting young tourists to coastal areas. The Status would also financially support small and medium businesses, enabling the tourist season to extend up to 6 months.
- Adapt the Labor Code to the specific requirements of seasonal work, through clear regulations regarding the duration of employment, working hours, leave entitlements, and accommodation conditions for employees.
- Increase the number of inspectors, especially during the peak tourism season (June–August). This would allow inspections in two shifts, including announced and unannounced checks until late hours, ensuring thorough oversight of workplace conditions, safety, and accommodation.
- Introduce sanctions for violations related to informality, underreporting, child labor, working hours, wages, provision of work equipment, hygiene, and treatment of workers.
- Create a joint platform between the Labor Inspectorate, General Tax Directorate, State Police, etc., for anonymous reporting of employer violations or corruption cases involving employers and inspectors.
- Implement continuous awareness campaigns in various city points and coastal areas to inform workers about the Labor Code and International Conventions regarding labor rights.
- Encourage sectoral union organization.

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ANNEX 1



REPUBLIKA E SHQIPËRISË

REPUBLIC OF ALBANIA

**MINISTRY OF ECONOMY, CULTURE AND INNOVATION
STATE LABOR AND SOCIAL SERVICES INSPECTORATE
DIRECTORATE OF LABOR INSPECTION**

Tirana, 04.07.2025

Subject: Response

INSTITUTE FOR CRITIQUE AND SOCIAL EMANCIPATION

Address: Karl Gega, Entrance 1, Apt. 66, TIRANA

Dear Sir/Madam,

Regarding the questions submitted in your request, sent via an official email to the institution on 25.06.2025 at the address Info. Sli, you are provided with general information according to your inquiries:

1. What is the number of seasonal employees in the tourism sector for each year from 2021 to 2024 (if possible, broken down by counties or major tourist areas)?
2. "2. How many seasonal workers are employed in the coastal tourism sector in Durrës and Vlorë counties?"
3. What are the most commonly used types of employment contracts for seasonal workers (e.g., fixed-term contract, no contract, part-time contract, etc.)?"

Regarding the above question, it is worth noting that in our country there is no explicit legal regulation for "seasonal employment" as a form of employment relationship carried out for a specific period, which would define how this type of employment can be conducted. Activities that may occur in certain seasons of the year include, for example, tourism, agriculture, etc. Law No. 7961, dated 12.07.1995, "Labor Code" (as amended), provides for employment under fixed-term contracts, if such a time limitation is justified by objective reasons related to the temporary nature of the work, where one such reason may be the performance of seasonal work. Based on the above, during inspections carried out in the tourist season, employment relationships have been observed to be formalized through both indefinite-term and fixed-term contracts.

4. What is the average duration of the seasonal work period in this sector?
5. How many working hours per day and how many working days per week?

6. What is the number and interval of inspections carried out by ISHPSHSH in coastal areas during the tourist season for each year from 2021–2024, as well as:
 - Which areas were the inspections focused on?
 - Were the inspections planned or unannounced?
 - What issues were addressed as the main focus (contracts, working hours, wages, occupational safety and health, etc.)?

The State Inspectorate of Labor and Social Services monitors the implementation of Labor Legislation in all entities operating in the Republic of Albania. Labor legislation includes both employment relationships and occupational health and safety.

Special attention is given to entities experiencing increased activity during the tourist season.

During inspections in the tourist season, the focus is on:

1. **Employment Relationships:**

- Whether employees have regular employment contracts.
- Whether **social security registration** has been completed before starting work.
- Compliance with working hours and payment for overtime.
- Employment of underage persons – prohibition of child labor in heavy work or without special authorization.
- Seasonal employment (fixed-term) – whether it complies with current legal provisions.
- Foreign employees.

2. **Occupational Health and Safety:**

- Risk Assessment Document.
- Personal and collective protective equipment.
- Informing and training employees about risks arising from work processes.
- Register of workplace accidents.
- Initial and periodic medical examinations.
- Emergency plan, including signage and fire-fighting equipment, verifying whether employees know how to respond in emergencies (fire, accidents, etc.).

The table below provides indicators on work inspections during the months of June–September in the activities Trade, Hotel, Bar, and Restaurant, by sectors and regions with increased activity during the tourist season, addressing questions 1 to 6.

"Table 1. Inspection indicators: total employees, shift workers, employees without contracts, employees not covered by social security."

Year 2021	No. of private entities inspected	Total number of employees	Number of female employees	Total number of employees in the second shift (19:00–22:00)	Total number of employees in the third shift (22:00–06:00)	Total number of employees without individual contracts	Total number of employees without social security coverage	Total number of employees enrolled in the social security scheme	Total number of employees working over 40 hours	Total number of employees working over 48 hours
	1	2	3	4	6	8	10	12	14	16
Tiranë-Region I	585	8,588	3,632	1,384	59	100	93	93	709	46
Tirana Inspection Sector	482	7,430	3,135	1,190	53	88	68	68	193	46
Durrës Inspection Sector	103	1,158	497	194	6	12	25	25	516	-
Vlorë-Region II	306	2,656	1,038	606	30	111	76	76	808	-
Berat Inspection Sector	70	270	150	55	1	43	7	7	50	-
Fier Inspection Sector	127	889	336	13	2	25	27	27	-	-
Vlorë Inspection Sector	109	1,497	552	538	27	43	42	42	758	-
Dr Dibër-Region III	99	360	147	52	8	82	65	50	118	3
Dibër Inspection Sector	50	254	107	37	8	36	35	35	117	3
Kukës Inspection Sector	49	106	40	15	-	46	30	15	1	-
Korçë-Region IV	185	1,001	418	65	8	90	100	100	125	-
Korçë Inspection Sector	114	703	292	51	8	41	48	48	20	-
Elbasan Inspection Sector	71	298	126	14	-	49	52	52	105	-
Shkodër-Region V	161	1,301	497	58	2	21	19	19	22	-
Shkodër Inspection Sector	95	705	292	50	2	9	9	9	-	-
Lezhë Inspection Sector	66	596	205	8	-	12	10	10	22	-
Gjirokastër-Region VI	84	435	197	71	9	32	15	14	127	-
Gjirokastër Inspection Sector	84	435	197	71	9	32	15	14	127	-
Sarandë Inspection Sector	-	-	-	-	-	-	-	-	-	-
Head Directorate	67	1,110	554	275	27	85	9	9	318	-
Total	1,487	15,451	6,483	2,511	143	521	377	361	2,227	49

Year 2022	Number of private entities inspected	Total number of employees	Number of female employees	Total number of employees in the second shift (19:00–22:00)	Total number of employees in the third shift (22:00–06:00)	Total number of employees without individual contracts	Total number of employees without social security	Total number of employees enrolled in the social security scheme	Total number of employees working over 40 hours	Total number of employees working over 48 hours
	1	2	3	4	6	8	10	12	14	16
Tiranë-Region I	522	8,499	3,606	1,989	112	100	90	89	2,475	30
Tiranë Inspection Sector	373	6,399	2,730	1,449	100	49	43	42	925	30
Durrës Inspection Sector	149	2,100	876	540	12	51	47	47	1,550	-
Vlorë-Region II	172	1,498	638	454	15	88	77	77	654	81
Berat Inspection Sector	31	176	103	7	1	13	13	13	-	-
Fier Inspection Sector	60	297	121	18	1	4	3	3	6	-
Vlorë Inspection Sector	81	1,025	414	429	13	71	61	61	648	81
Dr Dibër-Region III	41	131	49	15	2	30	24	24	4	-
Dibër Inspection Sector	14	50	18	10	2	17	18	18	4	-
Kukës Inspection Sector	27	81	31	5	-	13	6	6	-	-
Korçë-Region IV	154	838	381	53	6	97	62	62	221	-
Korçë Inspection Sector	79	551	249	50	5	43	16	16	35	-
Elbasan Inspection Sector	75	287	132	3	1	54	46	46	186	-
Shkodër-Region V	107	951	402	16	-	149	149	147	-	-
Shkodër Inspection Sector	76	667	275	13	-	136	136	134	-	-
Lezhë Inspection Sector	31	284	127	3	-	13	13	13	-	-
Gjirokastër-Region VI	119	1,106	530	244	30	27	26	26	168	-
Gjirokastër Inspection Sector	64	204	115	21	-	13	12	12	45	-
Sarandë Inspection Sector	55	902	415	223	30	14	14	14	123	-
Head Directorate	-	-	-	-	-	-	-	-	-	-
Total	1,115	13,023	5,606	2,771	165	491	428	425	3,522	111

Year 2024	Number of private entities inspected	Total number of employees	Number of female employees	Total number of employees in the second shift (19:00–22:00)	Total number of employees in the third shift (22:00–06:00)	Total number of employees without individual contracts	Total number of employees without social security	Total number of employees enrolled in the social security scheme	Total number of employees working over 40 hours	Total number of employees working over 48 hours
	1	2	3	4	6	8	10	12	14	16
Tiranë-Region I	891	13,276	6,163	2,666	209	190	188	186	3,495	51
Tiranë Inspection Sector	699	10,707	4,948	1,846	178	121	120	118	1,858	51
Durrës Inspection Sector	192	2,569	1,215	820	31	69	68	68	1,637	-
Vlorë-Region II	154	1,189	579	355	22	175	143	143	572	149
Berat Inspection Sector	24	96	45	21	1	44	16	16	-	-
Fier Inspection Sector	49	307	170	24	-	34	37	37	3	-
Vlorë Inspection Sector	81	786	364	310	21	97	90	90	569	149
Dr Dibër-Region III	8	45	22	16	-	24	19	19	25	-
Dibër Inspection Sector	8	45	22	16	-	24	19	19	25	-
Kukës Inspection Sector	-	-	-	-	-	-	-	-	-	-
Korçë-Region IV	121	609	316	60	4	107	87	87	147	-
Korçë Inspection Sector	76	429	224	56	4	64	45	45	69	-
Elbasan Inspection Sector	45	180	92	4	-	43	42	42	78	-
Shkodër-Region V	129	1,483	661	224	32	155	112	112	1	1
Shkodër Inspection Sector	64	847	416	150	24	77	61	61	-	-
Lezhë Inspection Sector	65	636	245	74	8	78	51	51	1	1
Gjirokastrë-Region VI	132	875	406	186	10	141	47	47	217	137
Gjirokastrë Inspection Sector	91	501	249	68	6	27	20	20	122	50
Sarandë Inspection Sector	41	374	157	118	4	114	27	27	95	87
Head Directorate	-	-	-	-	-	-	-	-	-	-
Total	1,435	17,477	8,147	3,507	277	792	596	594	4,457	338

Year 2024	Number of private entities inspected	Total number of employees	Number of female employees	Total number of employees in the second shift (19:00–22:00)	Total number of employees in the third shift (22:00–06:00)	Total number of employees without individual contracts	Total number of employees without social security	Total number of employees enrolled in the social security scheme	Total number of employees working over 40 hours	Total number of employees working over 48 hours
	1	2	3	4	6	8	10	12	14	16
Tiranë-Rajoni I	655	10,652	5,280	2,055	217	157	171	170	2,583	-
Sektori i Inspektimit, Tiranë	520	8,323	4,177	1,595	187	97	98	97	1,589	-
Sektori i Inspektimit, Durrës	135	2,329	1,103	460	30	60	73	73	994	-
Vlorë-Rajoni II	187	1,621	668	464	47	236	162	162	582	254
Sektori i Inspektimit, Berat	39	280	107	80	11	109	57	57	-	-
Sektori i Inspektimit, Fier	60	634	257	164	15	62	41	41	275	11
Sektori i Inspektimit, Vlorë	88	707	304	220	21	65	64	64	307	243
Dr Dibër-Rajoni III	11	55	30	8	3	-	7	7	17	-
Sektori i Inspektimit, Dibër	11	55	30	8	3	-	7	7	17	-
Sektori i Inspektimit, Kukës	-	-	-	-	-	-	-	-	-	-
Korçë-Rajoni IV	156	902	444	123	4	111	114	114	112	-
Sektori i Inspektimit, Korçë	106	730	360	116	4	90	90	90	41	-
Sektori i Inspektimit, Elbasan	50	172	84	7	-	21	24	24	71	-
Shkodër-Rajoni V	163	1,043	467	33	-	221	220	220	78	-
Sektori i Inspektimit, Shkodër	89	485	248	13	-	96	95	95	78	-
Sektori i Inspektimit, Lezhë	74	558	219	20	-	125	125	125	-	-
Gjirokastrë-Rajoni VI	199	1,592	718	444	50	501	125	125	1,100	123
Sektori i Inspektimit, Gjirokastrë	136	755	323	159	26	293	76	76	479	7
Sektori i Inspektimit, Sarandë	63	837	395	285	24	208	49	49	621	116
Drejtoria Qendrore	-	-	-	-	-	-	-	-	-	-
Total	1,371	15,865	7,607	3,127	321	1,226	799	798	4,472	377

— **Were the inspections planned or unannounced?**

The inspections were carried out based on the objectives of ISHPSHSH, focusing on planning inspections of economic entities with and without inspection history, and with potential risk of non-compliance with legal provisions regarding occupational safety and health and labor relations, including the tourist season due to increased labor market capacities, which include entities in the Hotel and Tourism sector and the risk of informal employment in all its forms.

Specifically, by year:

- In 2021, 93% of inspected entities were planned inspections
- In 2022, 91% of inspected entities were planned inspections
- In 2023, 90% of inspected entities were planned inspections
- In 2024, 88% of inspected entities were planned inspections

7. What are the most common violations observed in relation to seasonal work in tourism?

8. What administrative measures or penalties were imposed on entities found in violation?

Number of foreign workers employed in this sector during the summer season

Table 2. Administrative measures taken during the tourist season, broken down by year.

	Number of subjects with urgent suspension measure (for employment relationship)	Number of subjects with urgent suspension measure (for occupational safety)	Number of subjects with 'Warning'	Number of sanctioned subjects	Value of imposed sanctions
Year 2021	208	2	148	5	830,000
Year 2022	172	2	91	9	3,492,000
Year 2023	283	1	172	9	3,960,000
Year 2024	298	2	239	10	1,840,000

Table 3. Foreign workers recorded during the tourist season

	Number of foreign employees	Total number of foreign employees without a work permit
Year 2021	27	0
Year 2022	59	0
Year 2023	138	0
Year 2024	188	40

Thank you,

STATE INSPECTORATE OF LABOR AND SOCIAL SERVICES

DECLARATION OF THE SWORN TRANSLATOR

*I, Egi M Shabani, sworn translator of the English language, certified by the Ministry of Justice with certificate no. 1007, dated 31.07.2024, declare that I have translated the presented text from the source **Albanian** language into the target language **English** accurately, with due diligence, and with legal responsibility. Date: 16.12.2025*

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