



TRANSPOSING THE EU DIGITAL ACQUIS:

Pre-Accession Models for Legal and Institutional Alignment

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1.

Introduction: The Structural Gap in the EU Enlargement Framework

Over the past decade, the European Union has undergone the most profound regulatory expansion in its digital governance architecture since the creation of the Single Market. More than thirty major digital regulations – first the GDPR, and subsequently the DSA, DMA, AI Act, Data Governance Act, Data Act, EMFA, and others – have been adopted in a short period, fundamentally reshaping the digital regulatory ecosystem. Together, they form a new regulatory architecture governing data, media ecosystems, platforms, advanced technologies, digital markets, cybersecurity, and cross-border digital infrastructure. These acts, unlike directives, are **regulations**, which apply directly in all Member States and do not require national transposition.

Directives require transposition – regulations do not. The digital acquis is regulation-based, directly applicable, and deeply institutionalised.

This creates a structural challenge for candidate countries. They must prepare to apply regulations that, by their legal nature, **cannot yet apply to them**, since direct applicability only takes effect on the date of accession. The existing enlargement methodology offers no established models for this situation. Negotiation chapters were designed at a time when directives dominated the EU acquis; the shift towards regulation-based governance occurred **after** the enlargement framework had been defined.

For candidate countries, this creates a system-level problem:

1. Regulations cannot apply before accession, as their legal nature requires membership.
2. Candidate countries must nonetheless prepare to apply them on the day of accession.
3. There is no official EU guidance on how to approximate regulations before accession.
4. This results in uncertainty, fragmented national approaches, and the risk of misalignment at the moment of accession.

This challenge is not purely technical. The EU digital acquis increasingly functions as a governance framework underpinning the rule of law, democratic resilience, and market integrity – particularly in candidate countries where digital spaces often amplify existing institutional weaknesses.

The challenge affects every candidate country: from **Montenegro** and **Albania**, which are approaching the final stages of negotiations, and **Moldova** and **Ukraine**, which have the opportunity for a fast-track process, to **Serbia**, **North Macedonia**, **Bosnia and Herzegovina**, and **Kosovo**, whose accession trajectories remain longer and less predictable. Candidate countries currently operate with limited clarity on how to approach alignment with digital regulations in the pre-accession phase, or on the precise expectations that may apply during this period. This ambiguity is also reflected in existing dialogue formats, where discussions – such as those held at recent TAIEX workshops – have not yet translated into fully articulated or operational guidance on pre-accession digital acquis readiness.

As a result, candidate countries face a threefold uncertainty:

- **Legal uncertainty** – there is no established method for integrating regulations prior to membership.
- **Institutional uncertainty** – future regulatory functions will be distributed between national authorities and the European Commission in ways that differ from traditional acquis chapters.
- **Strategic uncertainty** – national governments lack clear guidance on whether to replicate EU regulatory effects, simulate EU-level regulatory functions, or limit the scope of pre-accession approximation.

This paper addresses that structural gap by proposing **coherent, legally sound, and institutionally feasible models** for pre-accession alignment with the EU digital acquis, drawing on comparative analysis, institutional design, and lessons from candidates' ongoing processes.

2.

Models of Legal Approximation: Foundations for Understanding Alignment with EU Law

Before proposing specific models of pre-accession alignment for digital regulations, it is necessary to recall the three classical modes of legal convergence between EU law and national law: **unification**, **harmonisation**, and **coordination**. Although EU regulations do not yet bind candidate countries, these mechanisms provide conceptual clarity for how approximation can be designed.

Unification refers to the replacement of national rules with EU rules in areas where the EU holds full competence. The key instrument is the **regulation**: once adopted, it overrides domestic law and becomes directly applicable. For candidate countries, unification can only occur on the date of accession, since regulations apply *ex lege* only to Member States.

Harmonisation allows national systems to approximate EU objectives while retaining discretion in legal drafting. **Directives** are the classic instrument, though their relevance in the digital sphere has diminished as the EU moves towards regulation-based governance.

Coordination involves procedural alignment, information-sharing, and the establishment of mechanisms for joint supervision across sectors and borders. Increasingly, digital regulations, particularly the DSA governance model, the AI Act conformity mechanisms, the EDBP and the EMFA Board, rely on coordination as a core method.

These mechanisms are complemented by three methods of legal alignment used in national systems:

- **Transposition** – literal incorporation of EU wording into domestic law (“word-for-word”), ensuring full compliance.
- **Pre-formulation** – adoption of national norms that reflect the substantive obligations of an EU act, while potentially preserving the national legislative tradition and terminology.
- **Referencing** – legal provisions that explicitly refer to EU rules, often in annexes, though this is rare and difficult to apply in practice, given the complexity of the *acquis* and national constitutional constraints.

Therefore, candidate countries cannot transpose the direct applicability of regulations in the technical sense before entering the Union. Pre-accession approximation of regulations should instead be understood as a form of functional alignment, focusing on selected obligations, procedures, and institutional roles, rather than as a formal transposition of direct applicability. Consequently, candidate countries **can and must** prepare their legal systems by:

- removing or amending national rules that contradict future EU regulations,
- adapting sectoral legislation to incorporate definitions, procedures, and institutional roles compatible with the EU framework,
- creating national bodies that will assume Member State functions upon accession, and
- preparing implementation acts that enter into force on the date of accession.

These objectives can be achieved through a set of interlinked measures, shaped by the strategic choices made and the mechanisms available within the candidate country.

3.

Regulatory Typologies in the Digital Acquis: Core Governance Categories Relevant for Candidate Countries

Digital regulations differ significantly in their structure, governance model, and distribution of regulatory functions between the European Commission and Member States.

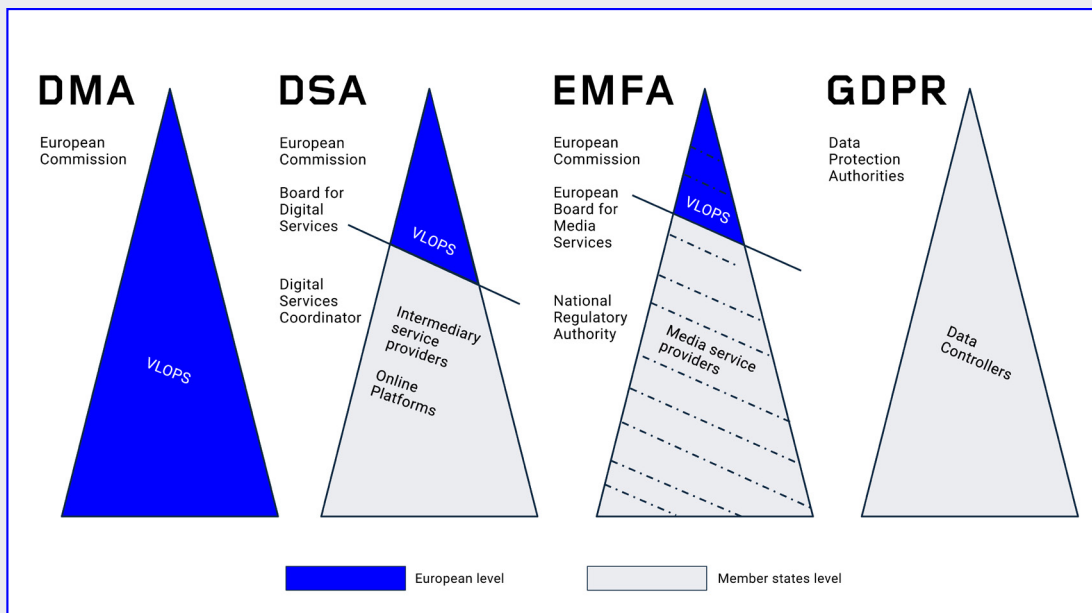


Figure 1: Regulatory functions distribution (DSA, DMA, EMFA, GDPR)

- The DMA is almost entirely **EU-exclusive**, centred on the Commission, with national authorities playing only a supportive role in assisting investigations and supplying relevant information.
- The DSA establishes **shared regulatory functions**, with clear EU authority over VLOPs and VLOSE, while national Digital Service Coordinators carry a substantial supervisory burden for online platforms, search engines, and online marketplaces of predominantly national relevance, alongside structured user-facing and non-state mechanisms. The AI Act follows a comparable shared-governance logic.
- The EMFA **distributes regulatory functions across Member States**, while EU bodies retain targeted intervention, coordination, and standard-setting powers.
- The GDPR, unlike the other instruments, relies almost entirely on **Member State-level enforcement**. National supervisory authorities hold full regulatory and enforcement competence, while EU bodies provide a mechanism for unifying interpretation and ensuring consistent application, rather than exercising executive or supervisory power.
- For candidate countries, this variation is decisive in determining appropriate alignment strategies. This paper identifies **distinct regulatory types**, each requiring a different pre-accession model.

a. Regulations with Member State-level enforcement

Examples: **GDPR, EMFA (most regulatory functions), Data Governance Act, General Product Safety Regulation, Market Surveillance Regulation.**

These regulations contain broad substantive frameworks whose enforcement depends primarily on national authorities. EU-level bodies (such as the EDPB) play coordinating or interpretative roles. For candidate countries, these acts often require **the most extensive pre-accession alignment**, as they structure domestic markets, rights, and compliance mechanisms.

The GDPR is the clearest example: it defines rights and obligations central to the functioning of many other digital acts. Without GDPR-level alignment, approximating the rest of the acquis is not feasible.

Characteristics::

- Primary enforcement by national authorities.
- EU-level bodies have advisory, standardisation, or coordination functions.
- High relevance for domestic markets and human rights protection.
- Foundational for alignment of other digital acts (GDPR especially).

b. Regulations with shared regulatory functions

Examples: **Digital Services Act, AI Act.**

These regulations establish a **shared governance model**:

- National authorities (DSCs, market surveillance authorities, notified bodies) supervise domestic actors.
- The European Commission supervises systemic actors (VLOPs, VLOSE, GPAI providers).
- Non-state actors and user-facing mechanisms support implementation through trusted flaggers, out-of-court dispute settlement, notice-and-action, and complaints and redress pathways.

The allocation of responsibilities is material, not territorial. Candidate countries should carefully calibrate the development of national governance structures prior to accession, ensuring preparedness without duplicating Commission-level regulatory functions that become applicable only upon membership.

Characteristics::

- Vertical allocation of supervisory tasks between national and EU levels, depending on actor type and risk level (for example, national DSC functions versus Commission supervision of VLOPs and VLOSE).
- Horizontal coordination through procedures, information exchange, and networked bodies (for example, the European Board for Digital Services and the AI Board).
- Multi-actor implementation architecture, including non-state actors and user-facing mechanisms where relevant (for example, trusted flaggers, out-of-court dispute settlement, and complaint and redress mechanisms under the DSA).

c. Regulations with Commission-exclusive enforcement

Examples: **Digital Markets Act, Foreign Subsidies Regulation.**

Here, national authorities have marginal or supportive roles and enforcement is almost entirely centralised. For candidate countries, the benefits of pre-accession alignment may be limited for three reasons:

1. No national authority can replicate Commission-level regulatory functions.
2. Enforcement has little domestic impact before accession.
3. Implementation capacity may be disproportionate to national needs.

Thus, these acts typically rank lower on national prioritisation lists, unless domestic policy goals justify early approximation.

Characteristics:

- Enforcement is almost entirely centralised at the **European Commission**.
- National roles limited to coordination, investigation support, or market monitoring.
- Domestic benefits from pre-accession approximation are limited.

4.

National Priorities: Strategic Motivation for Selective Alignment

Not all digital regulations are equally relevant to candidate countries prior to accession. Prioritisation depends on four drivers:

a. Protection of fundamental rights and alignment with global standards

Regulations such as the **GDPR**, **DGA**, parts of the **EMFA**, and the **Political Advertising Regulation** underpin core rights: privacy, free expression, media freedom, and election integrity. The **GDPR** is also a globally recognised standard.

Candidate countries therefore have strong incentives to align early, regardless of accession timelines. These incentives may vary considerably, from economic interests linked to integration into the Digital Single Market and the development of investment opportunities, to interests in strengthening human rights protection or advancing other national priorities while reducing systemic risks.

b. Sector-specific benefits for national markets

Certain regulations and forthcoming EU initiatives bring tangible domestic advantages well before accession, particularly in sectors where stability, consumer trust, and operational resilience are essential for economic development. Examples include:

- **The Digital Operational Resilience Act (DORA)** strengthens the financial sector by improving incident reporting, operational resilience, and cybersecurity risk management.
- **The Market Surveillance Regulation** enhances consumer protection and product safety, directly benefiting national industries exposed to global supply chains and reducing the prevalence of unsafe or non-compliant goods on the market.
- The forthcoming **Digital Fairness Act** is expected to address consumer-facing unfair practices in digital environments, including dark patterns, addictive design, influencer marketing, and unfair personalisation.

Early approximation to such regulations can strengthen trust in domestic institutions, boost the competitiveness of IT and fintech sectors, improve digital consumer protection, reduce fragmentation in product-safety oversight, and align national markets with EU expectations. Since these effects produce tangible domestic value well before accession, they often justify prioritising these regulations regardless of the broader enlargement timeline.

C. Political and institutional feasibility

Some acts – the DSA, the AI Act, and others – are increasingly seen as national priorities by many candidate countries, as they address issues that are politically salient and strategically important for long-term reform. Yet uncertainty remains as to whether, and to what extent, these complex frameworks can realistically be implemented with limited administrative, technical, and financial capacities. In countries where media reform and baseline digital regulation are still at an early stage, prematurely layering complex obligations may overload institutions and weaken reforms already underway. Sequencing should therefore reflect reform absorption capacity and bottom-up national priorities, not only the normative desirability of early alignment.

At the same time, digital governance increasingly intersects with broader rule-of-law and democratic resilience concerns. In several candidate countries, vulnerabilities in the digital sphere – ranging from weak platform oversight to exposure to disinformation, foreign information manipulation and interference (FIMI), and opaque messaging ecosystems – both reflect and reinforce broader institutional fragilities. In countries exposed to heightened geopolitical and information-security pressures in particular, digital regulation is increasingly perceived not only as a market-governance issue, but also as part of a wider resilience framework linked to democratic stability and the protection of the public sphere.

In this context, gradual alignment with EU digital governance frameworks may serve not only as regulatory preparation, but also as a mechanism for strengthening institutional integrity, improving governance capacity, and mitigating systemic risks within the digital environment. This is particularly relevant in light of emerging EU initiatives related to democratic resilience and the Democracy Shield agenda, where candidate countries may face growing expectations to align with European approaches to platform governance, media resilience, and systemic-risk mitigation even before accession.

As a result, candidates may opt for partial, phased, or stand-by alignment models that balance policy ambition with practical feasibility. Political and institutional feasibility is, in practice, frequently the most decisive filter, particularly in candidate countries where accession timelines are uncertain or where incumbent governments derive political benefit from the absence of certain regulatory frameworks. In such contexts, the absence of credible EU-oriented alignment pathways may also encourage the emergence of alternative national regulatory approaches that diverge from the logic of the *acquis* and raise concerns regarding proportionality, legal certainty, and funda-

mental rights protections. External pressure, EU incentive structures, and clearer guidance frameworks may therefore matter as much as purely domestic prioritisation logic.

d. Regulations with Commission-exclusive enforcement

Acts such as the **DMA** and parts of other regulations yield benefits only when a country is fully integrated into the EU governance network. For countries far from membership, these acts are secondary priorities.

5.

Accession Timelines and Political Context: How Membership Prospects Shape Alignment Models

Different candidate countries face different prospects and time horizons for accession to the European Union. This is a critical determinant of alignment strategy.

a. Candidates close to accession

Countries such as **Montenegro** and **Albania** can reasonably expect accession within a shorter timeframe. For them, the optimal strategy is often to:

- adopt stand-by implementation acts that enter into force on the day of accession,
- remove or adjust conflicting national laws,

- use the pre-accession period to build national-layer institutional capacities and establish procedures (DSC functions, media authorities, AI regulators, and redress and coordination mechanisms),
- avoid replicating EU-level regulatory functions that would be exercised by the Commission after accession.

This preserves legislative stability while focusing resources on institutional readiness.

b. Politically accelerated but institutionally constrained candidates

Countries such as **Ukraine** and **Moldova** occupy an intermediate position. While their political integration trajectories have accelerated significantly and ambitious alignment commitments have been made, substantial institutional, legislative, and geopolitical constraints continue to limit the feasibility of rapid full-scale approximation.

In these contexts, reliance solely on stand-by implementation models may create regulatory vacuums in strategically sensitive areas, particularly those linked to platform governance, disinformation, foreign information manipulation and interference (FIMI), election integrity, and media resilience. At the same time, attempts to introduce alternative national regulatory solutions outside the logic of the EU acquis may create fragmentation risks, fundamental rights concerns, and potential future incompatibilities with EU frameworks.

For these candidates, the most appropriate approach may involve selective and functional approximation of high-priority areas, combined with accelerated institutional capacity-building, safeguards for fundamental rights, and closer coordination with EU institutions. In practice, this implies a hybrid model: neither full substantive trans-

position nor purely stand-by alignment, but a sequenced framework focused on strategic vulnerabilities and operational preparedness.

c. Candidates further from accession (5–10+ years)

Serbia, North Macedonia, Bosnia and Herzegovina, and Kosovo face prolonged and uncertain timelines. For them, adopting only stand-by acts would create a decade-long vacuum; approximating selected elements of the acquis through **temporary transposition laws, framework acts, approximation of core procedures, or sectoral amendments** for domestically relevant obligations may therefore be sensible.

Because accession is distant, these countries should ensure that their digital markets evolve towards EU norms even before membership. Distance from accession thus correlates with the degree of substantive approximation required. A further consideration arises where the accession horizon is not only distant but also difficult to define with certainty. In such cases, reliance on stand-by legislation may become less practical, as the timing of its activation remains unclear. The focus may consequently shift towards more substantive approximation of domestically relevant obligations – not only as a form of pre-accession preparation, but also as a way to advance national regulatory frameworks in line with evolving EU standards. In this way, alignment may also take on a broader strategic role, contributing to the progressive integration of national digital spaces into the wider European regulatory and governance ecosystem.

6.

Integrated Model: How Governance Typology, National Priority, and Accession Timeline Shape Pre-Accession Alignment

Three analytical dimensions interact to shape every pre-accession alignment choice: the **governance type** (GDPR-type / DSA-type / DMA-type), the **national priority** (high, medium, low), and the **expected timeline for membership** (near-term vs mid-long-term). No single model suits all regulations or all candidate countries; the paper, therefore, proposes a **matrix-based approach** that generates differentiated pathways for each regulation.

The goal is not to replicate the EU legal order prematurely, but to **build the institutional and legal foundations** required for a smooth transition into the digital acquis. This involves developing models that:

- remove conflicting national rules before accession,
- create institutions that map onto future EU governance structures,
- adopt flexible frameworks capable of transforming from national to EU regimes,
- avoid duplication of Commission regulatory functions, and
- apply substantive provisions where they provide domestic value before accession.

The resulting models enable policymakers to tailor alignment to their strategic interests while maintaining coherence with the EU’s regulatory logic. At the same time, the regulatory bodies expected to lead implementation of the digital acquis are often not fully established – or, in some cases, not yet in place – at the outset of the pre-accession process. Institutional capacity must be gradually developed through the creation or adaptation of competent authorities, the clarification of mandates, the allocation of resources, and the accumulation of practical enforcement experience. National regulatory capacity therefore needs to be built in parallel with, and in anticipation of, the normative framework, rather than only once it formally enters into force.

The three variables interact dynamically: **in shared-governance regimes in particular, the same regulatory area may require only stand-by acts and institutional preparation for a near-term candidate, but a more functional temporary framework for one facing a longer accession horizon.**

7.

Alignment Matrix: Recommended Approaches for Key Regulations

The following table synthesises the three analytical dimensions into strategic recommendations. In addition to the three governance-based categories, the matrix includes a separate sectoral resilience track for instruments such as DORA and the Cybersecurity Act, where immediate domestic benefits may justify substantial alignment regardless of accession timelines.

Table 1. Pre-Accession Alignment Model by Governance Type, National Priority, and Accession Timeline

Governance Type	National Priority	Accession Timeline	Recommended Alignment Model	Rationale
Member State-level enforcement (GDPR-type regulations)	High priority for rights protection and strategic approximation	Near or distant accession	Full substantive approximation through national legislation	Creates the foundational legal and institutional architecture required for all subsequent alignment.
Shared regulatory functions (DSA-type regulations)	Medium to high, depending on policy goals	Near accession	Stand-by implementation acts and institutional preparation	Aligns the national governance layer, procedures, coordination, and redress mechanisms, while avoiding duplication of Commission-level supervision of systemic actors.
Shared regulatory functions (DSA-type regulations)	High priority	Distant accession	Gap mapping and institutional set-up, followed by temporary framework acts or functional approximation	Domestic reforms may be needed despite delayed accession; sequencing should first clarify gaps, institutional roles, and minimum capacities before introducing temporary national mechanisms.
Commission-exclusive enforcement (DMA-type regulations)	Low to medium	Near accession	Minimal alignment; focus on institutional readiness	Pre-accession enforcement is not possible at national level; domestic value is limited.
Commission-exclusive enforcement (DMA-type regulations)	Medium	Distant accession	Pre-formulation through sectoral law adjustments	Useful for developing domestic legal and market culture without duplicating EU enforcement.
Sectoral resilience and security regulations (DORA, Cybersecurity Act)	High	Any timeline	Full or substantial pre-accession alignment	Immediate domestic benefits independent of accession; critical infrastructure relevance.

This matrix is adaptable for any candidate country and can be operationalised through scenario-based roadmaps, regulatory audits, institutional design templates, and sequencing plans.

8.

Conclusion

This paper has presented an integrated framework for understanding how candidate countries can prepare for the implementation of the rapidly expanding EU digital acquis. By mapping governance-based regulatory typologies, national priority drivers, and accession timelines, it offers a structured basis for designing coherent pre-accession strategies that avoid fragmentation, reduce legal uncertainty, and strengthen institutional readiness.

Yet no single pathway suits all candidates equally: each country must navigate its own context, constraints, and ambitions, shaping a sequenced alignment model that reflects national interests while remaining in close and continuous dialogue with the European Commission. In doing so, candidate countries can approach accession not only as a legal obligation, but as an opportunity to build credibility, interoperability, and full preparedness for entering the EU's Digital Single Market.

At the same time, the logic of alignment may increasingly extend beyond preparation for membership alone. The progressive integration of candidate countries into selected elements of the EU's digital governance framework – where feasible, proportionate, and appro-

priately conditioned – could help reduce regulatory asymmetries, strengthen the integrity of the wider European digital space, and contribute to the Union’s resilience against systemic risks, including disinformation and foreign information manipulation and interference. In this sense, pre-accession alignment may gradually evolve from a purely technical approximation exercise into a broader instrument of regulatory convergence, democratic resilience, and strategic integration.

Nevertheless, flexibility in designing national alignment pathways is not unlimited. Certain substantive boundaries must be respected to preserve the integrity of the *acquis*: approaches that weaken core rights protections, replace effective enforcement with purely formal transposition, or depart from the essential logic and structure of EU regulatory frameworks risk creating legal and institutional discontinuities at the moment of accession. An individualised approach should therefore not become a vehicle for diluting the underlying principles of the *acquis*, nor for its instrumentalisation in pursuit of unrelated domestic objectives, including measures that could undermine fundamental rights or distort the intended regulatory balance. In this context, it would be valuable to establish a dedicated mechanism for monitoring pre-accession alignment with the digital *acquis*, serving both as a platform for the exchange of good practices and as an early-warning system to identify and address potential deviations from the EU framework.

9.

Policy Recommendation Addendum: Towards the Integration of the Western Balkans into the EU Digital Governance Framework

The European digital acquis and governance model are not only an objective, but a precondition for strengthening the rule of law, one of the fundamental criteria for EU accession. This is particularly relevant for candidate countries, where the erosion of democratic processes and the rule of law is increasingly reinforced and mediated through the digital sphere. In such conditions, national institutions require a renewed normative basis, clearer mandates and procedures, as well as strengthened capacities, independence, and autonomy. Candidate countries can most effectively address this systemic gap within the integrated framework of the EU's digital regulatory design, institutional structures, and coordination mechanisms.

At the same time, extending the EU digital governance model to the Western Balkans in particular would help mitigate and prevent the spillover of digital malpractices, disinformation, and foreign information manipulation and interference into the EU – a domain in which the region currently represents a significant source of risk. The integration of the Western Balkans into the EU digital governance framework is therefore both urgent and strategically necessary, and should be treated as a conditional factor and a key incentive within the enlargement process. It should not be understood as a parallel or substitute track, but as a complementary and enabling instrument that supports and accelerates EU integration.

A structured roadmap for integration should rest on three interrelated pillars:

1. Legal Basis: Bilateral Agreements

The integration of Western Balkan countries into the European digital governance framework should be grounded in tailored bilateral agreements with each country, enabling differentiated, country-by-country integration. Such agreements should build on existing instruments, notably the Stabilisation and Association Agreements (SAAs), while extending their scope to key areas of digital governance.

A relevant model can be found in the European Commission's 2026 recommendation to negotiate individual agreements with Western Balkan countries on roaming in public mobile communications networks, demonstrating how sector-specific integration can be structured through coordinated bilateral frameworks prior to full EU membership.

Such agreements should be underpinned by clear conditionality, requiring prior and continuous alignment with the relevant EU acquis, and supported by mechanisms for dynamic regulatory alignment, monitoring, and institutional coordination.

2. Sectoral Integration: Digital Governance Domains

Integration should be operationalised across key domains of the EU digital acquis, including digital platform governance, digital markets and competition, data and AI governance, media freedom and pluralism, and digital infrastructures and networks. While these domains represent distinct regulatory and policy areas, they are inherently interconnected and mutually reinforcing, reflecting the multisectoral nature of digital governance.

A coordinated approach across all domains is therefore essential to ensure comprehensive coverage, avoid regulatory gaps, and enable coherent and effective governance. This sectoral structuring allows for gradual alignment, while taking into account differentiated capacities and risk profiles across policy areas.

3. Implementation Phases and Monitoring Mechanisms

The process should be structured into clear phases: preparation and negotiation of sectoral agreements, regulatory alignment with the EU acquis, assessment of national readiness, strengthening of institutional capacities, and continuous monitoring of implementation.

It should further be supported by reporting, benchmarking, and compliance mechanisms, including the possibility of corrective measures or the suspension of benefits in cases of non-alignment. This ensures that integration is not merely formal, but effectively embedded in national systems.

The proposed roadmap is consistent with broader EU digital policies and the enlargement framework – including the Digital Decade, the Digital Single Market, the Berlin Process, and the Growth Plan for the Western Balkans – while directly contributing to EU initiatives aimed at strengthening democratic resilience, such as the Democracy Shield. The effective inclusion of candidate countries in relevant frameworks and mechanisms would reduce regulatory asymmetries, reinforce the integrity of the European digital space, and strengthen the EU's overall resilience to systemic risks, including disinformation and foreign information manipulation and interference.

10.

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