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**Presumed negative impact of developments on the Vjosa
river including hydro-power plant development and Vlora
International Airport (Albania)**

- COMPLAINANT REPORT -

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EcoAlbania



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Update Report

Complaint No. 2016/5: Presumed negative impact of hydro-power plant development on the Vjosa river (Albania)

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ABBREVIATIONS

ADF	Albanian Development Fund
AOS	Albanian Ornithological Society
COP	Conference of Parties
CSOs	Civil Society Organizations
DCM	Decision of the Council of Ministers
ECSOs	Environmental Civil Society Organizations
GOs	Governmental Organizations
EIA	Environmental Impact Assessment
GoA	Government of Albania
IUCN	International Union for Conservation of Nature
MoTE	Ministry of Tourism and Environment
KfW	German Development Bank
NGOs	Non-Governmental Organizations
OSA	On-the-spot Appraisal
PA	Protected Areas
PPNEA	Protection and Preservation of Natural Environment in Albania
SCM	Steering Committee Meeting
ToR	Terms of Reference
VIA	Vlora International Airport
WBIF	Western Balkans Investment Framework
WRNP	Wild River National Park

BACKGROUND

The complaint on Presumed negative impact of hydro-power plant development on the Vjosa river (Albania) has been submitted by EcoAlbania in 2016. The case has been opened with the Decision of the Bern Convention 37th Standing Committee Meeting. The Recommendation no. 202 of the Convention has defined the case as open and has requested Albanian authorities to address the concerns raised by the complainant.

These concerns have been continuously updated through reports and presentations during previous Standing Committee Meetings of the Convention. The current major concerns are the on-going construction of the Vlora International Airport in the delta of the Vjosa River, the effective management of the Vjosa Wild River National Park as well as recently started construction works related to water abstraction and HPPs in Shushica River, located within the boundaries of the Vjosa Wild River National Park proclaimed in 2023.

The airport is being constructed within the boundaries of the Candidate Emerald site “Wetland complex Vjosa river delta – Narta Lagoon”. In the following chapters, this Update Report will bring in the summary of the latest developments in the Vjosa river valley as regards to the Vlora International Airport, the National Park declaration process and the current threats that the Park is facing.

Shushica is one of the major tributaries of the lower part of the Vjosa and included in the Vjosa Wild River National Park. Currently, it is at significant risk by a water abstraction project just at its spring. The project that is based on largely poor EIA and social assessments, is foreseen to transfer the water from Shushica river towards the coastal neighboring municipality of Himara to improve its drinkable water supply system. Due to its severe negative environmental and social consequences, the project has been strongly opposed by the local community of Shushica valley, NGOs and academia because it compromises the river’s national park status.

VLORA INTERNATIONAL AIRPORT IN THE PROTECTED AREA

As regards this issue, last year (2023), the Convention has adopted the Recommendation 219 (2023), highlighting the “Suspension the construction of Vlora International Airport until a new and sufficient Environmental Impact Assessment (EIA) procedure will be conducted as well as a Proper/Appropriate Assessment.

After the adoption of the [Recommendation](https://rm.coe.int/2023-rec-219e-vlora-airport/1680ac7963)¹ no. 219/2023, it appears that the construction of the Vlora International Airport within the protected area of Vjosa-Narta (now called Narta Pishë-Poro) is ongoing and the companies are working in full rhythm. This is in line with the public announcement of the Prime Minister who has called for the construction to get finalized as soon as possible in order to turn the airport operational by June 2025. Thus, it is another postponement from the initially give deadline.

¹ <https://rm.coe.int/2023-rec-219e-vlora-airport/1680ac7963>



Besides habitat destruction, the disturbance continues non-stop on daily basis through high-machinery vehicles, causing various forms of noise pollution, light pollution, etc. Furthermore, the construction work continued very close to the local salina, even during avifauna breeding seasons.



In addition, it is noticed on-site that the work goes on at night-time, after midnight. Therefore, the first point of the Recommendation No 219 (2023) and all the points related to the construction of the airport, are violated.

Another development related to the construction of the Vlora International Airport is the adoption of the new DCM from the government of Albania as regards the “Definition of the rules for the development of the airport zones”, which has been published on December 18th, 2024. This decision adopted without any prior public hearing states that for the development, construction or use of private properties within the protected airport zone for activities or operations that may attract wildlife must be notified to the Civil Aviation Authority for approval. The radius of 15 km includes all the territory of the Protected Landscape and the Vjosa Delta.

Such decision is not aligned with the conservation efforts that the River National Park and Pishë Porë-Nartë Protected Landscape require and will affect the ecological integrity of both protected areas. This decision undermines the opportunity to implement mitigation measures to address the environmental impact of the airport. The decision actively discourages conservation efforts in the area and lead to wildlife habitats destruction.

As the work at the airport site is ongoing, the ornithologist team was not allowed again this year to conduct International Waterfowl Census in mid-January. PPNEAs team or other relevant wildlife monitoring organizations have not been invited or involved in the wildlife monitoring of the site, in discordance with the point 133 of the List of Adopted Text from the Standing Committee meeting. In addition, national media also has not been allowed inside the airport site in different occasions.

As regarding the new law on Protected Areas, it is important to emphasize that no reconsideration is made by the Albanian government so far, as required from the Adopted Text from the Standing Committee meeting, the point 127. Thus, the law is in power and based on this law, the GoA has taken decisions that foresee the removal of the zonation and the authorization of additional



activities in the protected landscapes. This DCMs are disregarding the point 128 of the List of Adopted Text from the Standing Committee Meeting. Furthermore, the DCMs open the space for the new construction permits for Touristic resorts are granted in the protected landscapes. This is the case of a construction permit is granted to “Zvernec South Adriatic Development” for a touristic resort in Zvernec peninsula, part of “Pishe-Poro Narte” Protected Landscape. There have not provided any EIA and there has not been any public hearing about this project.

Another development as regarding the new law of Protected Areas is that 37 MPs have filed a litigation request to the Constitutional Court to abrogate the new law. The request is approved by the Constitutional Court in January 2025. The NGOs have also requested to become part of the litigation process via an official request that has been sent to the Constitutional Court on February 7th, 2025. The request has been supported by the MPs and is yet to be assessed from the Constitutional Court.

LITIGATION PROCESSES ON VLORA INTERNATIONAL AIRPORT

Following the previous update report, as regards the opposition of the construction of the Vlora International Airport in the Protected Area, there are three judicial proceedings ongoing.

There is not yet approved the injunction relief to stop the construction as this case is being assessed in the Appeal Administrative Court. The cases in the Court are still ongoing but no additional significant update can be provided to the Bern Convention up to now

Conclusion:

In this respect it would be important that the Bern Convention repeats the request to the Albanian Government to follow the Recommendation No. 219 (2023) of the Standing Committee, adopted on 5th September 2023 and revised on 8th December 2024 and keep the file open.

THE VJOSA WILD RIVER NATIONAL PARK

Following the last Update Report of December 2024 and the presentation on the Convention 44th Steering Committee Meeting in December 2024, as regards the Vjosa Wild River National Park, no significant developments have occurred. Adoption of the Management Plan for the National Park has been concluded in mid-September 2023 but yet no structure is in place for the effective management on the ground.

The DCM no. 774 for the establishment of the managing authority of the Vjosa Wild River national Park is adopted on December 13th, 2024. This was followed by the order of the Prime Minister no. 19 issued on February 3rd, 2025, which enables the opening of the recruiting process for the team to be set up. The process is ongoing where at least 18 personnel are requested. In the meantime, the works for the construction of the new National Park Center has not yet started due to technical

and landownership that are being addressed both by the GoA and Tepelena Municipality. The team is expected to get established by mid 2025.

DIVERSION PROJECT OF SHUSHICA RIVER

As presented during the 44th SCM of the Bern Convention in December 2024, Another important topic that may compromise the Vjosa National Park and its integrity is a project for the construction of the Himara Municipality water supply system. The project has started its planning phase in 2021, received permissions in mid-2022 (prior to the proclamation of the Vjosa National Park in March 2023), and started construction in 2023. This project consists of full diversion of water from the Shushica river main spring towards the Himara municipality, located along the Ionian coast.

The project is expected to provide water to Himara municipality but also along the pipeline two small Hydropower projects are foreseen to be constructed.

After the massive reaction of local communities which live beside the Shushica river, expressed in organizing protests, petitions and even blocking of the construction site as well as the main national road the construction has been halted and in the part of the project that lies within the National Park boundaries. This part refers only to at least 7 km of the overall 17 km pipeline that has already finished construction.

Due to high social and environmental sensitivity the developer and the investor namely Albanian Development Fund and WIFB and KfW, have tried to calm down the situation by trying to organize meetings with local community in the region. The last meeting has taken place in Kuç (near the planned intake of the water) on December 23rd, 2024. Although that the intention has been to clarify the situation and to present the changes on the initial project, the reaction from the local community has been once more massive.

Lately both the ADF and Himara Municipality have publicly announced that the project will be redesigned and will take less water than initially planned but this is not backed up by any hydrological study.

Under these circumstances IUCN has been called up to assess the expected consequences, especially as regards the environmental concerns. After several months of study on the available data and of the hydrological measurement on site, the IUCN has published the [study](#) on “*The Mitigation Hierarchy in action: IUCN support for decision-making on rural water supply infrastructure in and around the Vjosa Wild River National Park, Albania*”.

The main finding of this study are as follows:

- The Shushica River and its floodplain **hold significant biodiversity value**, particularly within its springs and near-natural river stretches and floodplains, including tributaries and torrents. It includes diverse abiotic conditions, habitats, and endemic species, potentially habitat to an array of as-yet unknown biodiversity values, due to the current lack of detailed research data. Specifically, the Upper Shushica River is classified as a "**critical habitat**" according to its

high biodiversity importance, including habitats for Critically Endangered or Endangered species. It represents a highly threatened or unique ecosystem, characterized by near-natural free-flowing rivers with dynamic channels and active floodplains. The river supports vital ecological functions necessary for maintaining biodiversity, such as flow dynamics and sediment transport.

- **Significant adverse impacts are expected** from the Rural Water Supply IV Project under various flow conditions, including current and future variability expected from climate change, including direct, indirect and cumulative impacts, such as reduced flow velocity and habitat loss. Such impacts include potential habitat degradation and reduced biodiversity, with aquatic species being particularly vulnerable to the proposed effects.
- **Cumulative impacts, including water abstractions** mainly for irrigation, sediment and nutrient inputs, compound these challenges. Additional water abstractions from the Upper Shushica River will very likely lead to impacts on the river system, regardless the amount of water abstracted compared to recent conditions.
- The original, unmitigated Rural Water Supply IV Project is **expected to have implications for the objectives of the VWRNP**. As planned, the project water abstraction will not comply with IUCN guidelines for Category II National Parks, potentially affecting the park's integrity and conservation objectives as well as ecosystem services.
- The **lack of detailed data**, and the limited timeframe to conduct a full hydrological year assessment, hampers a comprehensive impact assessment, including quantification of impacts and mitigation needs.

The study provides 3 scenarios to proceed:

1. Scenario 1: FULL AVOIDANCE, from a nature conservation perspective, should be clearly prioritized to avoid adverse impacts on the VWRNP including its conservation objectives. IUCN (International Union for Conservation of Nature): Vjosa Wild River National Park – Mitigation Hierarchy Assessment VI
2. Scenario 2: MINIMIZATION, achievement of Net Gain or at least No NetLoss of biodiversity is less feasible, given the baseline conditions characterized by several water abstractions already in place.
3. Scenario 3: MITIGATE / OFFSET HIGH IMPACTS addresses water abstraction impacts with limited mitigation, likely leading to unavoidable adverse impacts on biodiversity and the VWRNP integrity.

After the publication of this study the Embassy of the Federal Republic of Germany in Albania, in the role of the main investor of the project through KfW, has called up a joint meeting between all stakeholders, including NGOs. The meeting was held in the end of January 2025, and the aim has been to present the IUCN study outcomes and to define the steps to be followed.

It has been agreed that the project cannot go as it has been initially planned but it has been also

clear that the recommendations of the IUCN study have been also disregarded as the construction works are expected to restart anytime soon.

The restart of the construction not based in knowledge of hydrological data and biodiversity assessment may deteriorate the conservation values of the Shushica and may implicate the IUCN standards of the National Park.

Finally, this Project is undermining the Vjosa Wild River National Park as a vision but also as regards the expected irreversible negative impact on its nature conservation values. Thus, the water supply system of Himara Municipality must find alternative water sources that does not implicate the natural integrity of the Europe's first Wild River National Park.

In this respect it would be important that the Bern Convention may consider the IUCN Assessment and the Mitigation scenario that it proposes in order to avoid irreversible expected negative impact that this project may have in the entire Vjosa River System.

OUTLOOK

EcoAlbania and its partners will continue to follow and contribute to the process for the effective management of the Vjosa Wild River National Park in accordance with the adopted Management Plan. In this regard, EcoAlbania will follow closely the process of the establishment of the Managing Authority and the National Park Center that is expected to get finalized in the following year.

In addition to this, EcoAlbania and its partners are closely following the process of the Vjosa River Basin Management Plan and is considering supporting this process for a better-informed decision-making process integrating science and local societies. The process has started in December 2023 with the kick-off of the EU4Water programme led by the National Agency for Water Recourses Management. This programme will have in focus also the development of the Vjosa Integrated River Basin Management Plan.

Furthermore, EcoAlbania will keep the constant communication with its partner organization, AOS and PPNEA that are fully committed to follow closely the development of the Vlora International Airport. The same NGOs will monitor the construction on the ground with the aim to gather information and produce monitoring reports on the and assessments on the expected negative impacts from the construction of the Vlora International Airport.

As regards to the litigation processes, EcoAlbania will closely follow the continuation of the processes that it is directly involved in such as the ones that opposes the diversion of the river due to the construction of the water supply system of Himara Municipality. EcoAlbania will further support other judicial process that have been initiated by the other ECSOs, including the Vlora International Airport lawsuit case. EcoAlbania is grateful for the On-the-spot Appraisal conducted by the Bern Convention in the Vjosa-Narta Protected Area in late August, early September 2022 and appreciates the report compiled by the independent expert. Having said so, EcoAlbania highlights the need for keeping the file open and following up the decision taken by the Convention under Recommendation no 2019/2023 which is based on the adoption of the OSA Report by the Bureau.

Finally, as regards the Shushica case, EcoAlbania will follow up on raising awareness on the issue, support the local communities, bringing addition knowledge on the nature conservation values of the Shushica river as integral part of the Vjosa. It is of sever importance that the Recommendations of the Mitigation Scenario presented at the IUCN study should be fully followed by the Albanian Government, Himara municipality and the Albanian Development Fund.

The follow up of the lawsuit in the Constitutional Court as abrogation of the new law on the Protected Areas will also be EcoAlbania's top priority.