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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee
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Open file: 2016/5

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

- COMPLAINANT REPORT -

Document prepared by
EcoAlbania

November 2025 Update

Case File 2016/05 – Submission of new evidence on EU Accession Benchmarks (Chapter 27) Supporting Recommendation No. 219 (2023)

To: Bern Convention Secretariat
From: EuroNatur, PPNEA, and EcoAlbania (Complainants in Case 2016/05)
Date: 12.11.2025

Dear members of the Secretariat of the Bern Convention,

We write to formally submit new evidence under *Case 2016/05 (Albania: Presumed negative impacts on the Vjosa River, including hydropower plants and Vlora International Airport)* for your consideration. This submission provides recent European Union accession benchmarks, specifically the EU's Common Position on Cluster 4 (Green Agenda and Sustainable Connectivity) and Chapter 27 (Environment and Climate Change), which closely align with and reinforce Recommendation No. 219 (2023) of the Bern Convention Standing Committee, and the Decisions and Adopted Texts of the 2024 Sanding Committee. The *EU's negotiating position for Albania's accession*, adopted 16 September 2025, sets forth binding environmental requirements that mirror the measures urged by Recommendation 219 (2023) regarding the Vjosa-Narta ecosystem and related governance issues.

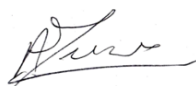
The European Union now explicitly requires Albania to halt or reassess environmentally harmful projects, strengthen protected area legislation, and uphold European nature protection standards as conditions for EU membership. These conditions directly support the Bern Convention's calls (Rec. 219/2023, and 2024 conclusions) to suspend construction of the Vlora Airport in the Vjosa-Narta Protected Landscape pending proper assessments, to restore robust legal protections for critical habitats (in light of the new Law No. 21/2024 on Protected Areas), and to improve overall environmental governance. We believe this convergence of EU and Bern Convention expectations presents an opportunity to secure stronger compliance with the existing Standing Committee recommendations and conclusions. Our evidence defines these parallels in detail, for inclusion in the Standing Committee's evidence base.

We appreciate the Bureau's and Standing Committee's continued attention to this case. By leveraging the EU accession process, we hope to reinforce the implementation of Bern Convention Standing Committee recommendations and ensure Albania aligns its development plans with European wildlife and habitat conservation obligations. Thank you for considering this submission, which we trust will assist in your ongoing review of Albania's compliance.

Sincerely,



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CEO EcoAlbania



Aleksandër Trajçe
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Gabriel Schwaderer
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Abstract

Recommendation No. 219 (2023), adopted by the Bern Convention Standing Committee on 5 September 2023 and revised on 1 December 2023¹, urges Albania to prevent irreversible damage to the Vjosa-Narta Protected Area from infrastructure development, particularly the Vlora International Airport project. The Recommendation calls on Albania to suspend airport construction until a new Environmental Impact Assessment (EIA) and Appropriate Assessment are completed, to establish comprehensive biodiversity monitoring, to assess alternative infrastructure options, to strengthen stakeholder engagement, and to reinforce legal protection for the Vjosa River delta and its biodiversity—including consideration of upgrading the protection status of the Vjosa-Narta area. These actions are essential for Albania to meet its obligations under the Bern Convention to conserve endangered habitats and species. The same recommendations were reaffirmed by the 44th Standing Committee in 2024, taking into account the amendments introduced by Law No. 21/2024 on Protected Areas.²

In September 2025, Albania opened negotiations on EU accession Cluster 4 (Green Agenda and Sustainable Connectivity), including Chapter 27 on Environment and Climate Change. The European Union’s Common Position for these negotiations establishes specific benchmarks and conditions that Albania must fulfil to progress toward membership. These requirements reinforce the Bern Convention’s objectives by translating environmental obligations into binding accession criteria, creating additional leverage to ensure the conservation outcomes envisaged by the Standing Committee’s recommendations and conclusions.

This submission highlights the alignment between the EU’s accession benchmarks and the Bern Convention’s Recommendation No. 219 (2023), focusing on four key areas:

1. Vjosa-Narta Protected Landscape and the Vlora Airport project – EU demands regarding EIA procedures, project compliance with EU nature laws, and suspension/review of projects that threaten protected areas.
2. Law No. 21/2024 on Protected Areas – EU requirements to restore robust legal protections, repeal harmful amendments, and ensure Albania’s protected area regime aligns with EU Habitats and Birds Directives.
3. Environmental Governance and Stakeholder Engagement – EU expectations on “environmental rule of law,” including public participation (Aarhus Convention principles), enforcement of EIA/SEA directives, and strengthening Albania’s capacity to implement environmental legislation.
4. Integrating Biodiversity into Development Planning – EU support for strategic planning (e.g. transport and infrastructure plans) that avoids biodiversity conflicts, and recognition of initiatives like the Vjosa Wild River National Park and transboundary conservation efforts.

¹ Recommendation No. 219 (2023) of the Standing Committee, adopted on 5th September 2023 and revised on 1st December 2023¹, on the possible impacts of infrastructure and urbanisation developments particularly Vlora International Airport, on the Vjosa-Narta Protected Area, <https://rm.coe.int/2023-rec-219e-vlora-airport-rev/1680ad922d>

² Bern Convention again urges to stop Vlora Airport in Albania, Dec (2024), EuroNatur, <https://www.euronatur.org/en/what-we-do/news/bern-convention-urges-to-stop-vlora-airport-in-albania#:~:text=Strasbourg%20Tirana%20Radolfzell,the%20Bureau%20to%20suspend%20construction>

EU Accession Benchmarks for Albania's Environment (Cluster 4 - Chapter 27)

1. Suspension of Harmful Projects Pending Proper Environmental Assessments (Vlora Airport): The EU Common Position on Chapter 27 emphasizes that all new investments in Albania must comply with national environmental legislation aligned to the EU acquis³. In particular, Albania is urged to fully implement the Environmental Impact Assessment (EIA) and Strategic Environmental Assessment (SEA) Directives, ensuring “*inclusive impact assessments*” and effective public involvement for plans and projects⁴. This directly reflects Recommendation 219’s first operative point, which calls on Albania to suspend construction of Vlora International Airport until a new and sufficient EIA and Appropriate Assessment are carried out⁵. The European Commission has likewise raised serious concern that Albania proceeded with the airport without a valid EIA, noting in its 2024 report that construction “continues, despite the [Bern Convention’s] request ... to suspend the works until a new and sufficient EIA is conducted”.

The EU accession framework thus makes clear that project development cannot advance in violation of EU environmental standards. The European Parliament’s July 2025 resolution on Albania’s progress explicitly “*reiterates its concern over the construction of the Vlora airport in the Vjosa-Narta Protected Area, in violation of national and international biodiversity protection norms*” and “*calls on the Commission to address the issue in Chapter 27 of the accession negotiations*”⁶. In essence, the EU is now echoing the Bern Convention’s demand: no further work at Vlora Airport should proceed without a proper, EU-compliant assessment and safeguards. This provides a powerful incentive for Albania to regard Recommendation 219 (2023) Point 1, failure to do so not only breaches Bern Convention but will potentially stall EU negotiations.

Furthermore, the evaluation of alternatives, another core aspect of Rec. 219 (Points 3 and 4), is reinforced by EU law. The EIA Directive (Directive 2011/92/EU as amended) requires assessment of reasonable alternatives for projects, and EU officials have signalled that alternative solutions for Vlora Airport should be considered. The European Parliament urged Albania “*to halt projects that risk violating biodiversity standards, such as the Vlora airport*” and consider less harmful solutions. Recommendation 219 had similarly urged a Wildlife Monitoring Programme and analysis of alternative sites for any needed airport infrastructure. By conditioning chapter closure on Albania’s alignment with EU EIA rules, the EU Common Position indirectly supports measures that Albania must demonstrate that major infrastructure projects like airports follow EU-compliant evaluation procedures, including consideration of alternatives and mitigation. Namely, what the Bern Convention has recommended as prudent action is now being demanded by the EU as an accession benchmark.

2. Strengthening Legal Protection for Protected Areas (Addressing Law No. 21/2024): A critical new development has been Albania’s adoption in February 2024 of Law No. 21/2024, which amends the Protected Areas law (Law 81/2017). This law introduced sweeping changes that effectively open the door to infrastructure and tourism developments inside protected areas, weakening or removing prior bans on

³ Ibid. 4. Chapter 27 – Environment and Climate Change, pg. 10

⁴ Ibid. pg 11

⁵ Answer given by Ms Kos on behalf of the European Commission, Question for written answer E-002918/2024 to the Commission Rule 144 Sebastian Everding (The Left), Cristina Guarda (Verts/ALE): Serious environmental and safety concerns regarding the construction of the new Vlora International Airport, https://www.europarl.europa.eu/doceo/document/E-10-2024-002918-ASW_EN.html

⁶ European Parliament resolution of 9 July 2025 on the 2023 and 2024 Commission reports on Albania (2025/2017(INI)), Paragraph 56, https://www.europarl.europa.eu/doceo/document/TA-10-2025-0155_EN.html#:~:text=and%20best%20practice%20to%20ensure,27%20of%20the%20accession%20negotiations

construction in these ecologically sensitive zones⁷. Conservation organizations and even members of Albania's Parliament have warned that the amendments "*severely undermine the integrity of protected areas*" and conflict with EU nature legislation (Birds and Habitats Directives) and international conventions (Bern, Ramsar, CBD). The Bern Standing Committee in Dec 2024 expressed "deep concern that the new law on protected areas may conflict with the principles and obligations enshrined in the Bern Convention, potentially facilitating violations of its provisions", urging Albania to reconsider and ensure compliance with the Convention. This reflects a fear that projects like the Vlora Airport were made possible only by diluting legal protections for the Vjosa-Narta Protected Landscape.

The European Union's Common Position directly tackles this issue. In its Chapter 27 conditions, the EU notes with alarm the amendments to the Protected Areas law (Law No. 21/2024), stating that these changes "*have raised concerns as they lead to extensive tourism and industrial investment in protected areas and now permit activities which risk compromising Albania's ecological and biodiversity values, including potential Natura 2000 sites, in conflict with EU standards.*"⁸. Accordingly, one of the explicit accession requirements in the nature protection field is that Albania "repeal the incompatible provisions enacted through amendments to the law on Protected Areas (Law No. 21/2024)"⁹. The EU also calls on Albania to terminate the parallel 2015 "strategic investments" law, which had allowed certain developments to bypass environmental safeguards¹⁰.

This EU position aligns strongly with the intent of Recommendation 219 (2023). While Rec. 219 was adopted before Law 21/2024 came into force (and thus does not mention it by name), several of its points implicitly require maintaining rigorous legal protections for sites like Vjosa-Narta. Notably, Rec. 219 Point 9(b) "*considers the initiative to create the Vjosa National Park (IUCN category II) including the Delta of Vjosa and the Narta Lagoon*", i.e. upgrading the Vjosa-Narta area to national park status, and Point 9(c) calls for development planning in the delta to prioritize biodiversity. These recommendations clearly conflict with any legal regime that would allow airports or other "strategic" projects in such areas. By requiring Albania to restore its protected area legislation to EU/Bern standards, the EU accession benchmarks give teeth to Rec. 219's vision. The European Parliament has likewise condemned the legal changes, "*express[ing] serious concern regarding recent amendments to Albania's Law on Protected Areas that allow large infrastructure and tourism projects in ecologically sensitive zones*" and urging that "these legislative amendments be reversed" to ensure full compliance with conservation standards¹¹. In summary, Albania cannot advance in EU membership talks unless it fixes Law 21/2024, which in turn would fulfil the Bern Convention's call to safeguard the Vjosa-Narta site's legal status.

It bears noting that compliance with the EU Nature Directives (Birds and Habitats) is a core element of Chapter 27. The Vjosa-Narta area has been a candidate Emerald Network site since 2005, and under Bern Convention Recommendation 157 (2011) should be treated as protected pending its formal inclusion in the Emerald (and future Natura 2000) network. The EU Common Position explicitly expects Albania to align fully with the Birds and Habitats Directives, complete its Natura 2000 site designation, and grant

⁷ Biodiversity. The Case of the Western Balkans, EuroNatur (2024), pg. 14/15 Changes to the Law on Protected Areas, https://www.euronatur.org/fileadmin/docs/umweltpolitik/Biodiversitaet/EuroNatur_Biodiversity_Report_211124.pdf

⁸ EU Common Position, AD15/25, pg. 11

⁹ Ibid. pg 30

¹⁰ Ibid.

¹¹ European Parliament resolution of 9 July 2025 on the 2023 and 2024 Commission reports on Albania (2025/2017(INI)), Paragraph 57, https://www.europarl.europa.eu/doceo/document/TA-10-2025-0155_EN.html#:~:text=and%20best%20practice%20to%20ensure,27%20of%20the%20accession%20negotiations

appropriate protection status to those areas¹². By mandating the repeal of Law 21/2024's problematic provisions and requiring "appropriate protection status" for sites, the EU is essentially insisting that areas like Vjosa-Narta be shielded from destructive development, precisely what Recommendation 219 and previous Bern recommendations (No. 202 (2018) on Vjosa hydropower, etc.) have sought.

2.1. Recent tourism developments enabled by Law 21/2024: Darëzezë and Zvërnec Cases

The impact of Law No. 21/2024 is already evident on the ground. In 2025, the National Territorial Council (KKT) approved multiple large-scale tourism developments within the Vjosa-Narta Protected Landscape and Emerald candidate site, illustrating how the new legal framework is actively facilitating projects that conflict with Albania's need for conservation, as well as international obligations.

Darëzezë Area (Northern part of the Vjosa Delta and within the Pisha-Poro-Narta Protected Landscape):

The National Territorial Council (KKT) has commissioned the preparation of a *Detailed Local Plan for the Touristic Development of the Adriatic Sea, Darëzezë area*, in the municipality of Fier¹³. Darëzezë, part of the former *Managed Reserve Pisha-Poro* and since 2022 integrated into the *Protected Landscape of Narta*, is included in the broader development vision announced by Minister of Infrastructure Balluku and Prime minister Rama, featuring large-scale infrastructure such as aqua parks and golf courses¹⁴.

Zvërnec Area Developments (Southern part of the Vjosa Delta and within the Pisha-Poro-Narta Protected Landscape / Emerald Site Vjosa-Narta):

In three meetings, KKT has approved three separate resort projects in the Zvernec area, likely located on the peninsula where the Kushner plans have been previously unveiled:

- **18 April 2025:** Development permit for a touristic resort by *Zvërnec South Adriatic Development sh.p.k* – https://azht.gov.al/wp-content/uploads/2025/07/Rend-Dite-KKT_18_Prill_2025.pdf
- **28 May 2025:** Permit for a touristic complex (11 stories above ground, 1 below) by *Turi M.Z.P sh.p.k* with location in Zvërnec, Vlora municipality – https://azht.gov.al/wp-content/uploads/2025/07/Rend-Dite-KKT_propozim_28_Maj_2025.pdf
- **25 June 2025:** Permit for "Arte Marea 1", a touristic complex with holiday houses, services, and a hotel by *Green Investment sh.p.k* with location in Zvërnec, Vlora municipality – https://azht.gov.al/wp-content/uploads/2025/07/Rend-Dite-KKT_propozim-25-qershor-2025.pdf

These projects are planned within areas known for high biodiversity, situated inside a legally designated Protected Landscape and overlapping a candidate Emerald Network site. Under the Bern Convention's Recommendation No. 157 (2011)¹⁵, such sites must be protected from degradation prior to formal

¹² EU Common Position, AD15/25, pg. 30

¹³ National Territorial and Water Council (KKT) meeting 18.04.2025, point 1. Plani i Detajuar Qendror për "Zhvillimin Turistik të Bregdetit Adriatik, Zona Darëzezë, Bashkia Fier. https://azht.gov.al/wp-content/uploads/2025/07/Rend-Dite-KKT_18_Prill_2025.pdf

¹⁴ Albanian Telegraphic Agency, 24.04.2025, "Mes Semanit dhe Vjosës", Balluku: Projekti më i ri për zhvillimin e bregdetit të Darëzezës, <https://ata.gov.al/2025/04/24/mes-semanit-dhe-vjoses-balluku-projekti-me-i-ri-per-zhvillimin-e-bregdetit-te-darezezes/>

¹⁵ Recommendation No. 157 (2011) of the Standing Committee, adopted on 2 December 2011 and revised on 6 December 2019, on the status of candidate Emerald sites and guidelines on the criteria for their nomination, <https://rm.coe.int/2011-rec-157e-revised-in-2019-on-emerald-network-criteria/1680993e41>

designation, an obligation reinforced by both the Standing Committee's 2024 conclusions and the EU's Chapter 27 requirements.

These developments vividly demonstrate how Law 21/2024 and associated policy shifts are already contributing to the erosion of protected areas. Unless urgently reversed, such trends risk rendering Albania's protected areas vulnerable to unchecked investment pressures, contrary to both Bern Convention Recommendations and EU accession benchmarks. The EU's explicit call for the repeal of Law 21/2024 provisions is thus not only justified, it is now urgent.

3. Environmental Governance, Public Participation, and the “Environmental Rule of Law”: Both the Bern Convention and the EU have identified systemic issues in Albania's environmental decision-making processes highlighted by the Vlora Airport case. One issue was the lack of transparent, inclusive consultation. Despite the Vjosa-Narta lagoon's importance, the airport project was approved with minimal public input, domestic NGOs and experts were largely sidelined, and the project moved forward even as international treaties' bodies (Bern Convention, AEWA, Ramsar) raised objections. Recommendation 219 (2023) Point 10 calls on Albania to “*build a deeper cooperation with the full spectrum of stakeholders... in particular, initiate collaborations with the most relevant NGOs*” in infrastructure projects. It also emphasizes the use of scientific expertise (e.g. wildlife strike prevention experts per Point 5) and the need for credible data (Point 2's multi-year monitoring program).

The EU's accession criteria reinforce these good governance requirements. The Common Position praises some steps toward the Aarhus acquis (access to information, public participation, access to justice in environmental matters) but stresses the need for further improvement. The EU explicitly “*emphasizes the need for further attention to ensuring that the public, including civil society organizations, can challenge plans and calls on Albania to take swift action to address these issues, in line with the Aarhus acquis*”¹⁶, reiterating the importance of access to courts for NGOs and individuals. Crucially, the EU notes concern that “*in practice, larger infrastructure investment projects have proceeded without adequate transparency and consultation processes.*”¹⁷ This is an unmistakable reference to cases like Vlora Airport, where normal public scrutiny and environmental due diligence were arguably bypassed. The European Parliament's resolution similarly “*highlights the need for transparent and inclusive public consultations... ensuring active involvement of local communities, NGOs and scientific institutions in environmental decision-making, especially on projects with large environmental and socio-economic repercussions*”, warning that lack of proper stakeholder engagement undermines governance standards and Albania's compliance with EU obligations. In calling out these deficiencies, the EU is effectively demanding the same remedy as Bern Rec. 219: better inclusion of stakeholders and experts to uphold environmental law.

Additionally, the EU Common Position places heavy emphasis on strengthening inspections, enforcement capacity, and the prevention of environmental crimes. It underlines that Albania must show a “*solid track record of implementation and enforcement*” of the environmental acquis, including impact assessment procedures. Notably, the Commission has pointed out that works on Vlora Airport even began without a valid construction permit in 2021, contravening national law. Such occurrences highlight enforcement gaps. The EU acquis on environmental crime and liability (illegal habitat destruction, wildlife crime, etc.) will require Albania to pursue violations vigorously. In essence, Albania is being asked to uphold an “environmental rule of law”, a principle that aligns with Bern Convention Articles 4 and 6 obligations. Compliance with Recommendation 219 (e.g. stopping works pending a lawful EIA, respecting protected area rules) is a litmus test for this principle. It is encouraging that the EU Common Position specifically flags the Vlora case as an example: by insisting that “*all infrastructure investments... fully comply with the*

¹⁶ Ibid., pg. 12

¹⁷ Ibid.

EU acquis” and citing the Law 21/2024 issue, the EU is putting Albania on notice that environmental governance must markedly improve.

Finally, the EU is supporting capacity-building efforts that fits with Rec. 219’s recommendation point 8 suggests an intensive capacity-building programme on sustainable infrastructure and biodiversity conservation, potentially via international expert workshops. The EU, in turn, invites Albania to participate actively in EU environmental networks and to strengthen the capacity and resilience of institutions against undue influence. The European Commission and other EU bodies have offered technical assistance (through IPA funds and projects) to help Albania prepare for Chapter 27 implementation. This support can facilitate the ecological monitoring, data collection, and planning improvements that Rec. 219 calls for (e.g. establishing wildlife monitoring programs and improving the Emerald Network database, see Rec. 219 Point 11). Therefore, the EU accession process is galvanizing the governance reforms, transparency, scientific grounding, rule enforcement, and stakeholder engagement, that are integral to fulfilling the Standing Committee’s recommendations.

4. Integrating Biodiversity into Broader Planning: Vjosa River Conservation and Infrastructure Development

Beyond the immediate issue of the airport, Recommendation 219 (2023) advocated a more strategic approach to avoid future conflicts between infrastructure and nature. Point 6 urges an ecosystem-based approach in line with the Convention on Biological Diversity, integrating biodiversity into transport planning. Point 7 calls for updating Albania’s National Transport Master Plan in parallel with a National Green Infrastructure Plan, aligning with European initiatives like the Trans-European Transport Network (TEN-T) and the emerging Trans-European Nature Network (TEN-N) and EU Green Deal objectives. Point 9 promotes the concept of a “Free European River of Vjosa” in cooperation with Greece, including developing a cross-border River Basin Management Plan (RBMP) for the Vjosa that incorporates biodiversity and climate adaptation, and formally establishing the Vjosa National Park (Category II) including the Vjosa Delta and Narta Lagoon. These forward-looking recommendations aim to ensure that economic development is reconciled with conservation, not only for Vjosa-Narta, but countrywide.

The EU’s Common Position and related EU statements strongly support these directions. Chapter 27 benchmarks require Albania to align with the EU Water Framework Directive and develop River Basin Management Plans for each river basin, including transboundary coordination where applicable¹⁸. Achieving a high-standard RBMP for the Vjosa (as per Rec. 219 Point 9(a)) is thus both a Bern and an EU expectation. Indeed, the EU notes Albania already has an advanced alignment with water legislation, but further efforts are needed to implement plans and ensure international coordination. Albania will be expected to incorporate measures for ecological connectivity (as Article 10 of the Habitats Directive calls for, explicitly referenced in Rec.219 Point 7(b)[50]) and to account for biodiversity in infrastructure schemes. The requirement for a National Green Infrastructure Plan resonates with EU policies encouraging nature-based solutions and habitat connectivity as part of spatial planning. While the EU Common Position does not mention “TEN-N” by name (the concept is very new), it does urge that “environmental protection requirements are integrated into other sectoral policies” and that Albania promote “*resource-efficient, low-emissions and climate-resilient development*”. Updating transport plans to avoid critical habitats is implicit in these obligations.

Crucially, the formal establishment of the Vjosa Wild River National Park in March 2023, covering 400+ km of the Vjosa and tributaries upstream, was welcomed by European institutions. The European Parliament (Resolution on Albania 2025) “*welcomes the establishment of the first wild river national park in Europe, the Vjosa Wild River National Park, and calls for sufficient resources to be allocated to its*

¹⁸ Ibid. pg. 18

protection”. The Parliament also urged Albanian authorities to “*fully respect the national park’s ecological integrity and to reconsider infrastructure projects, notably the water abstraction project on the Shushica river, ... to ensure that the park’s biodiversity, habitats and ecological functions remain intact.*”. This statement aligns with Rec. 219’s concern that no new projects (like the Shushica diversion) should undermine the Vjosa’s integrity as a free-flowing ecosystem. It is noteworthy that the Shushica project was explicitly raised by the Bern Bureau in 2024 as well, and the authorities were asked to report on it. Now, the EU has effectively put the Albanian government on notice that such projects must be reconsidered or rigorously assessed under Chapter 27 oversight.

4.1. Regarding the Vjosa delta and Narta Lagoon: while Albania’s designation of the upper Vjosa as a National Park was a positive step, the delta and lagoon remain a weak link, they currently have only “Protected Landscape” status (IUCN Category V) and are the very area targeted by the airport. Recommendation 219’s Point 9(b) clearly encourages upgrading this to National Park level protection and integrating it into national conservation planning. The EU accession process indirectly supports this by requiring that Natura 2000 sites be designated and given proper protection status. Since the Vjosa-Narta is a candidate Emerald (and a prime Natura 2000 candidate site, with over 220 bird species and important wetlands), Albania will need to ensure it achieves a protection regime equivalent to EU standards. The Common Position’s nature protection benchmark explicitly requires Albania to demonstrate it can effectively preserve designated areas, with necessary conservation measures in place. Incompatible land uses (like large-scale infrastructure) are not consistent with such standards. Thus, by insisting on strict nature acquis compliance, the EU is implicitly backing the idea that Vjosa-Narta should be managed as a true conservation zone (e.g., part of the National Park or an EU Natura 2000 site).

The EU has also embraced the “European Wild River” concept for Vjosa. In April 2023, the Vjosa was announced as a model for Europe’s Green Deal aspirations, and EU officials attended the NP inauguration. Transboundary cooperation with Greece (which hosts the Vjosa/Vjosë’s lower stretch, called Aoös) is strongly encouraged by EU policy. Recommendation 219’s call for cooperation with Greece on a free-flowing Vjosa (Point 9) aligns with the EU integration ethos. Indeed, regional cooperation on environmental issues is a factor in the enlargement process, and the EU frequently highlights the need for Western Balkan countries to jointly address biodiversity and water management. Albania’s active contribution to such initiatives would further demonstrate the “European values” in environmental stewardship that the EU expects accession countries to embody.

The EU accession benchmarks fully support a development pathway for Albania that integrates biodiversity considerations at all levels, from project-specific assessments (like Vlora Airport’s suspension pending proper EIA) to national legislation (fixing the protected areas law) and strategic planning (transport and river basin plans factoring in conservation). This approach mirrors the comprehensive set of actions in Recommendation 219 (2023). Where the Bern Convention provides the conservation roadmap, the EU provides the compliance mechanism and incentive (EU membership) to drive that roadmap’s implementation.

Conclusions and recommendations

The evidence presented above demonstrates a remarkable convergence between the Bern Convention’s Recommendation No. 219 (2023) and the European Union’s Common Position on Cluster 4/Chapter 27 (2025) for Albania’s EU accession. Both frameworks unequivocally call for urgent corrective steps by Albania to protect the Vjosa River and Narta Lagoon ecosystems:

1. **Halting and reassessing the Vloora Airport project** – until rigorous environmental assessments (meeting EU/EIA standards) are performed and alternatives are considered.
2. **Restoring strong legal protections for protected areas** – by overturning recent legal amendments (Law 21/2024) that undermine conservation and ensuring alignment with EU nature legislation.
3. **Enhancing environmental governance** – through transparent public participation, stakeholder collaboration, and improved enforcement, so that decisions follow science and law, not short-term expediency.
4. **Integrating biodiversity into planning** – via ecosystem-based approaches, updated infrastructure plans (transport, energy, etc.) that avoid ecological conflicts, and completing the designation and management of sites like Vjosa-Narta as part of the Emerald/Natura 2000 network.

These parallel demands are not merely aspirational; in the EU context they are preconditions for Albania's advancement toward membership. The EU's benchmarks are effectively binding, in that Albania must fulfill them to close Chapter 27 negotiations. This provides a powerful lever to reinforce Bern Convention Recommendation 219 (2023). Albania's obligation to "*take the necessary protection and conservation measures*" for candidate Emerald sites like Vjosa-Narta is now reinforced by the incentive of EU accession: meeting Bern Standing Committee Recommendations is in Albania's own interest if it wishes to join the European Union.

We, the submitting organizations, respectfully urge the Bern Convention Secretariat and Standing Committee to take note of these EU Common Position benchmarks in its ongoing scrutiny of Case 2016/05. We believe the Standing Committee can leverage the alignment with EU conditions by:

- Emphasizing to the Albanian government that implementation of Recommendation 219 (2023) will also satisfy key EU accession requirements, helping Albania's European integration prospects.
- Coordinating with EU institutions (the European Commission's DG ENEST and DG Environment, EU Delegation in Albania, etc.) to ensure a unified message is delivered to Albania that non-compliance with Bern Convention recommendations will adversely affect EU negotiations (as already signaled in the EU's Common Position and Parliament's resolution).
- Inviting the Albanian authorities to report not only on each point of Rec.219 (as requested at Standing Committee and Bureau meetings) but also on their progress in meeting the related EU Chapter 27 benchmarks (e.g. steps taken to repeal or amend Law 21/2024, status of the new EIA for Vloora Airport, etc.). This would highlight gaps and drive action on overlapping obligations.

The EU accession process offers a timely opportunity to reinforce and operationalize Recommendation No. 219 (2023). The European Parliament noted that environmental protection and sustainable tourism must go hand in hand, welcoming Albania's creation of Vjosa National Park and expressing deep concern over Vloora Airport and the Protected Areas law amendments. The Bern Convention's voice in this matter is now echoed by the voice of the EU. We trust that the Standing Committee will use this synergy to ensure that Albania pauses and rethinks any project or policy that endangers its natural heritage, from the Vjosa headwaters to the Narta Lagoon. By aligning its actions with both Bern Convention and EU benchmarks, Albania would demonstrate its commitment to Europe's environmental values and avoid irreparable damage to one of the continent's most precious wild river systems.



Update Report

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

By **Olsi Nika**
EcoAlbania
July 2025

ABBREVIATIONS

AANP	Albanian Association of National Parks
AOS	Albanian Ornithological Society
CSOs	Civil Society Organizations
DCM	Decision of the Council of Ministers
ECSOs	Environmental Civil Society Organizations
EIA	Environmental Impact Assessment
EPAN	Environmental Protected Areas Network
EPAs	Environmental Protected Areas
EU	European Union
GoA	Government of Albania
GOs	Governmental Organizations
IUCN	International Union for Conservation of Nature
MoTE	Ministry of Tourism and Environment
NAPA	National Agency for Protected Areas
NGOs	Non-Governmental Organizations
NTC	National Territorial Council
OSA	On-the-spot Appraisal
PA	Protected Areas
PM	Prime Minister
PPNEA	Protection and Preservation of Natural Environment in Albania
SCM	Steering Committee Meeting
ToR	Terms of Reference
VIA	Vlora International Airport
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.

AMENDMENTS ON THE LAW ON PROTECTED AREA

The review of Albania’s Protected Areas (PAs) has undergone a complex and often controversial process from 2019 to 2025. The entire process from the beginning to the time being is divided into 2 main phases: The announcement and initiation that has taken place during the Covid-19 pandemic period (2019-2020) and the Backlash and legal opposition that has taken place in the post-pandemic period (2020-2025), which is still on going. Below is a structured chronological summary detailing the key developments, reactions, and outcomes.

Launch and Early Developments (2019–2020)

May 2019: Minister Blendi Klosi publicly announced the initiation of a review process for the boundaries of Albania's Protected Areas (EPAs), signalling a shift in environmental policy priorities.

June 2019: The National Agency for Protected Areas (NAPA) published a tender worth approximately €273,000 for a study of Albania's PAs. The contract was awarded to the National Association of Albanian Parks.

Aug.–Sept. 2019: NGOs received invitations for meetings with the Working Group set up by the Albanian Association of National Parks (AANP). However, engagement was limited and opaque.

Sept.–Nov. 2019: Local consultation meetings took place, but participation was low. The findings of the contracted researchers were presented, leading to increasing concerns among CSOs.

Nov.–Dec. 2019: Civil society organizations publicly expressed their unease with the lack of transparency and requested formal information from relevant authorities.

December 6th, 2019: CSOs and academics met with the Ministry of Tourism and Environment (MoTE), seeking clarification on the process. They found the available data to be confusing and fragmented.

December 2019: A pivotal meeting was held between CSOs, academics, and the AANP's Working Group. The participants agreed:

- A 5-year timeline was necessary for in-depth field studies to evaluate PAs.
- Reductions in existing PA boundaries should not be made prematurely.
- Proposals for new PAs must be based on scientific evidence and wide consultation.

February 2020: The final version of the study was presented by MoTE and NAPA without the accompanying maps. Concerns were raised that many of the previous recommendations had been disregarded.

Throughout 2020: The process stalled, with minimal public visibility or updates, raising suspicions about transparency and direction.

Decisions, Backlash, and Legal Disputes (2020–2025)

December 28th, 2020: The National Territorial Council (NTC) approved a decision to revise PA boundaries and zoning. CSO input was largely ignored. The study claimed expansion of protected territory to 807,775 ha (28% of national territory), though many areas were reclassified or reduced:

- Prespa National Park reduced by 136.94 ha
- Butrint National Park by 809.7 ha
- Lake Shkodra Nature Managed Reserve by 1,641.15 ha
- Kune-Vain Protected Landscape by 339 ha
- Buna-Velipojë Protected Landscape by 2,582.32 ha

February 2021: CSOs renewed their concerns and demanded transparency.

March 2021: NTC's decision was officially published, sparking protests by CSOs and academics on March 20 in front of MoTE.

April 2021: CSOs, both environmental and non-environmental, signed an open letter to PM Rama, urging reconsideration. Diplomatic missions and international bodies were also alerted.

April 14, 2021: The EU Delegation and 16 embassies held an emergency meeting with MoTE and AKZM, demanding more consultation and a re-evaluation of the process.

May 25, 2021: The EU Ambassador publicly emphasized the importance of involving CSOs and academia in PA-related decisions and expressed cautious optimism about governmental responsiveness.

June 2022: A final contentious meeting was held between CSOs and government bodies. Disagreements remained unresolved due to perceived ecological harm from the revisions.

November 2022: NTC finalized and approved the new map of the PA Network, excluding only one "enclave" — the site of Vlora International Airport.

Early 2023: The government adopted new decisions reflecting the revised map, introducing two new national parks: the Albanian Alps and the Vjosa River Park (the latter declared in March 2023). In June, 10 environmental organizations filed lawsuits at the Administrative Court of Appeal in Tirana to challenge these decisions.

Late 2023 – Early 2024: While court proceedings gained traction, the government initiated legislative changes through Parliament, prompted by a petition from 12 municipalities. These changes aimed to ease restrictions in PAs, citing development needs.

February 2024: Law 21/2024 amended Law 81/2017, allowing construction and exploitation in PAs for elite mass tourism — effectively legalizing development inside protected areas.

February 2025: Despite opposition, President Mr. Begaj enacted the law. Subsequently, CSOs AOS and EcoAlbania, with 28 MPs, filed a constitutional lawsuit to repeal it. In their claim the NGOs are appealing for the total abrogation of the new law on protected areas, as it violates the constitution and it enable regress in the goal and essence of the law due to the fact that it legitimises the massive intervention into the existing protected areas. The case was submitted in December 2024 and is ongoing in 2025.

June 23rd, 2025: After the preparatory procedure, the Constitutional Court decided to accept the lawsuit and call the parties into the court a 6-hours [hearing](#). The parties have presented the arguments inf front of the court. The plaintiffs' arguments have been also deposited in a [written form](#). During this hearing several key questions have been raised by the court members to the parties. In this respect the court decided to postpone the hearing until all questions have been clarified.

July 1st, 2025: The [final hearing](#) took place. After the final court debate, the panel has withdrawn to make the decision. The Constitutional Court does not have a deadline for making decisions, but the decision is expected to be made in the coming weeks.

The final decision is fundamental and inextricably linked to all developments in each of the protected areas, including the management and development of the Vjosa Wild River National Park as well as the Vjosa-Narte protected landscape area.

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](#)¹⁹ no. 219/2023, it appears that the construction of the Vlora International Airport within the protected area of Vjosa-Narta (now called Narta Pishë-Pore) 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.



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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 Pisha Poros-Narte 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



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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 – MANAGEMENT

Following the last Update Report of February 2025 and the presentation on the Convention 44th Steering Committee Meeting in December 2024, as regards the management of 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 recruitment process has been finalized and the new personnel that will manage the WRNP is selected. This includes also the selection of the new National Park Director. However, the new team is not yet officially announced. The park management is still led by the work of the existing RAPAs structures. In the meantime, a little progress is made with the construction of the new National Park Center. The construction works has already started in the selected location near the Tepelena town and is expected to get finalized by mid 2027.

THE VJOSA WILD RIVER NATIONAL PARK – THE THREATS

The Vjosa Wild River National Park, officially designated in March 2023, stands as Europe’s first and only wild river national park, covering over 12,700 hectares in southern Albania. Encompassing the Vjosa River and its main tributaries, the Drino, Shushica, and Bënça, the park is renowned for its uninterrupted natural flow, dynamic sediment transport, and extraordinary biodiversity. This complex river system includes over 47 freshwater springs and supports a mosaic of habitats that are crucial for endemic and endangered species. However, despite its protected status, the park is under growing pressure from a multitude of human activities that pose a serious risk to its ecological and hydro morphological integrity. EcoAlbania has [identified](#) and [mapped](#) the threats to the Vjosa WRNP during the end of 2024 and the first half of 2025. A comprehensive [report](#) is released in early June 2025 and has already created a massive reaction in the [media](#) and in public discourse.

One of the most significant threats comes from **oil extraction** activities, particularly in the Selenica and Mallakastër areas. With approximately 150 oil wells, many of which are close to the river, frequent leaks and spills have been documented, severely contaminating soil and water systems. The infrastructure supporting these operations is largely outdated and poorly maintained, and the proximity of wells like those in the Gorisht-Kocul field, just 1.3 kilometers from the river, amplifies the risk of environmental degradation.





These oil operations are accompanied by **bitumen extraction** and processing, primarily in Selenica, where 13 mines operate within 100 meters of the riverbanks. The discharge of heavy metals and unregulated waste dumping into informal landfills within the park boundaries pose a grave threat to both water quality and aquatic life.





Water abstraction presents another critical concern. Water is abstracted and diverted extensively for irrigation, domestic supply, and industrial use, especially in the lowland areas of Fier and Gjirokastër. This practice reduces river flows significantly during the dry season, threatening aquatic habitats and leading to the drying of tributaries such as the Shushica and Drinos. However, according to EcoAlbania’s observations, the water abstraction is increased significantly immediately after the proclamation of the National Park in a full disrespect with the provision of the Management Plans that states that no additional or renovation of existing water abstraction infrastructure should take place in the Vjosa WRNP. The lack of accurate data on abstraction points and water volumes further complicates the management of this issue, making it difficult to assess the full extent of the impact.



Gravel extraction has been identified as one of the most widespread and damaging activities within the park. With 36 extraction and processing plants mapped, including 17 currently active, this industry has altered sediment dynamics, eroded riverbanks, and degraded vital riparian habitats. Decades of gravel removal, often conducted with little oversight, have physically reshaped the river's morphology and contributed to a decline in groundwater levels, particularly in the Shushica basin.



Urban waste and wastewater pollution also pose systemic threats. Many municipalities lack comprehensive waste management plans, and large areas remain unserved by formal collection systems. As a result, waste, especially plastic, is dumped directly into the river or its floodplains, while untreated wastewater from both urban and rural sources flows freely into the river system. This pollution is exacerbated by unregulated construction, deficient sewage infrastructure, and a general lack of enforcement, particularly in hotspot areas like Përmeti, Tepelena, Memaliaj, Novosela, and Këlcyrë.





Despite the fact that the park’s management plan outlines clear prohibitions against new extractive operations and aims to totally phase out existing harmful activities within the next 10 to 15 years, most of the identified threats are actually environmental crimes and should be addressed immediately. In addition, the plan prioritizes assessments of the threats, habitat restoration, the removal of illegal waste sites, the reduction of water abstractions, and the implementation of sustainable alternatives. However, without immediate and decisive enforcement, the Vjosa’s wild character and ecological value remain in jeopardy.

Considering all these threats EcoAlbania and its partner organizations have approached the MoTE by sending officially a [letter of concern](#) urging them to address these threats immediately but in [response](#) the MoTE has replied very vaguely, broadly and not considering the specific and concrete

threats. In [reply](#), EcoAlbania has come up with clear demands and offer cooperation to the MoTE.

In parallel [letter of concern](#) and information was sent also to the donor's community including EU.

One of the key pressures of the water abstraction remains the Himara Municipality water supply system for which EcoAlbania has reported over the past period. Unfortunately,

The Shushica Diversion Project:

As provided in the previous Update Report of February 2025, the Shushica River Diversion remains an open case of major concern. Despite the massive efforts undertaken by IUCN with the conduction of the thorough assessment of the expected consequences of the project, the Albanian Government had ignored the findings and the recommendations given by IUCN. Immediately after the publication of the study, the construction on site have started in full-power mode and the project is being constructed within the national park boundaries in the first 7 km of the pipeline. While the IUCN study has recommended that further assessments were needed in order to determine the ecological flow level that must be respected during the operational phase of the project, since March 2025 there have been no assessment or measurement taking place on the ground but, in contrary massive construction works are ongoing especially at the intake location.

The legal battle on this case is still ongoing in the Administrative Court of first instance whereas EcoAlbania alongside with 50+ people from the local community of the Shushica River valley have filed the lawsuit. During the current reporting period the Court has refused the Injunction Relief to stop the construction while it has approved the plaintiff's request to appoint an independent expert that will assess the project footprint after the changes of the project as well as the environmental consequences of it. The upcoming hearing in the Court is set in mid-September 2025.





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.

The address of the threats to Vjosa WRNP is an essential part of the follow-up work of EcoAlbania. In this respect the immediate action and public commitment from Albanian Government is fundamental. EcoAlbania will follow up the threat identification and will be open to cooperate with the GoA to set up and implement a short-terms action plan to address the threats as well as working on a long-terms strict monitoring system set up that will enable the managing authority to have a comprehensive knowledge on the activities occurring within or in the vicinity of the park.

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.



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Update Report

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

By Olsi Nika
EcoAlbania
February 2025

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.

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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.

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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.

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THE VJOSA WILD RIVER NATIONAL PARK

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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 findings 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.