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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

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Bureau of the Standing Committee

16-18 September 2025

Strasbourg

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



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 in 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](#)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-Porë) 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 Poro-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 – 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 Gjirokastrë. 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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LITIGATION PROCESSES ON VLORA INTERNATIONAL AIRPORT

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Conclusion:

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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.