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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

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Standing Committee
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Strasbourg, 7-11 December 2026

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Open file: 2016/05

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

COUNCIL OF EUROPE | BERN CONVENTION

Progress Update by the Complainants

Case-file 2016/5: Presumed negative impact of developments on the Vjosa River, including Vlora International Airport

Prepared jointly by EcoAlbania, PPNEA and EuroNatur
Evidence cut-off: 30 July 2026

Abstract

This progress update is submitted by the complainants ahead of the September 2026 Bureau meeting and provides relevant information on the implementation of Recommendation No. 219 (2023), the matters identified by the Bureau at its June meeting, and material developments affecting the Vjosa–Narta area.

On the basis of information available to the complainants, Recommendation No. 219 remains substantially unimplemented. In particular, no new and sufficient Environmental Impact Assessment (EIA) and appropriate assessment meeting the requirements identified by the Standing Committee has been completed for Vlora International Airport, while other requirements concerning cumulative assessment, monitoring, cooperation and Emerald Network information remain outstanding or cannot be independently verified.

Recent developments concerning the proposed Zvërnec tourism development reinforce these concerns. Available information indicates that a development permit was approved on 30 March 2026 and a preliminary works permit on 29 April. Physical interventions were reported from 30 April, while on 15 May the competent environmental authority announced that an in-depth EIA would be required before a construction permit could be issued. This sequence raises concern that physical intervention preceded completion of the environmental assessment process and may have altered the ecological baseline the assessment is intended to examine.

These developments also reinforce the Bureau's June request that cumulative impacts of Vlora International Airport and new developments be considered. The airport, Zvërnec tourism development and associated or foreseeable infrastructure affect components of the same Vjosa Delta–Vjosë–Nartë ecological complex and should not be assessed solely as separate project footprints.

Important information remains unavailable to the complainants and the public, including substantial parts of the permitting record, authoritative spatial information, the updated Emerald Network Standard Data Form (SDF), and information on follow-up to the Secretariat's offer of technical support.

In light of continuing implementation gaps and the risk of irreversible ecological damage, the complainants respectfully request the Bureau to proceed with the on-the-spot appraisal deferred in June, maintain Case-file 2016/5 open and Recommendation No. 219 in force, and reiterate the need for effective preventive measures pending compliant environmental and cumulative

assessment.

1. Implementation of Recommendation No. 219

The following table provides the complainants' assessment of the implementation of Recommendation No. 219, based on information available as of 30 July 2026. Where implementation cannot be independently verified, this is indicated accordingly.

Key requirement of Recommendation No. 219	Status	Update / assessment
Point 1 – Suspend airport construction pending a new and sufficient EIA and appropriate assessment	**Not implemented**	Construction was not suspended as required. No new and sufficient assessment meeting Recommendation No. 219 has been neither started nor completed to the knowledge of the complainants.
Points 2 & 5 – Biodiversity monitoring and appropriate scientific expertise	**Outstanding / not verified**	No complete public multi-year monitoring dataset and analysis meeting the Recommendation has been identified. Adequate independent, site-specific expertise addressing the Recommendation is not publicly demonstrated.
Points 3 & 4 – Alternatives assessment and revision of the EIA/environmental measures	**Outstanding**	No new and sufficient airport EIA, including a genuine alternatives assessment capable of informing the project decision, has been identified.
Points 6 & 7 – Ecosystem approach, ecological connectivity and related infrastructure planning	**Not demonstrated**	No landscape-scale cumulative assessment addressing the airport together with tourism and associated development pressures across the Vjosa–Narta ecological complex has been identified. Recent developments at Zvërnec make this requirement increasingly urgent.
Point 9 – Protection of the Vjosa system, including the delta/Narta area	**Significant concerns remain**	Major development pressures remain in the delta/Narta complex, while recent physical interventions at Zvërnec raise additional questions concerning damage and restoration.

Points 8 & 10 – Effective implementation and cooperation	**Outstanding / partial**	Structured cooperation concerning airport assessment and monitoring has not taken place. Important information, including the updated Emerald SDF and parts of the permitting and spatial record, remains unavailable to the complainants.

Overall, the core requirements of Recommendation No. 219 remain substantially unimplemented. Most importantly, the new and sufficient assessment required for Vlora International Airport remains outstanding, while subsequent infrastructure interventions in Narta reinforce the need for comprehensive cumulative assessment across the wider Vjosa–Narta ecological complex.

2. Update on the matters identified by the Bureau in June 2026

2.1 Permits and procedural steps concerning Zvërnec

Available information concerning the proposed Zvërnec tourism development indicates the following chronology:

- 30 March 2026 development permit approved (official document still unpublished)
- 29 April 2026 preliminary-works permit issued
- 30 April onwards physical interventions reported
- 15 May 2026 the competent environmental authority announced that an in-depth EIA would be required before a construction permit could be issued.

Construction works started at the peak of the bird breeding season and at the beginning of the sea turtle nesting season.

The permits themselves had not been publicly available to the complainants by the reporting cut-off, preventing independent scrutiny of its precise conditions, spatial coverage and supporting documentation.

Available field evidence documents substantial physical interventions within the Vjosë–Nartë Protected Landscape, including the opening of approximately 8 km of access road, construction of a bridge across the Portonova Channel, fencing of the development area with permanent concrete foundations, and the clearing and levelling of approximately 2.8 hectares of dune and pine-forest habitat. Heavy machinery and a construction/preparatory camp were also documented on site. These interventions affected ecologically sensitive dune, wetland and coastal habitats and raise particular concerns regarding hydrological connectivity and habitats used by protected species.

Although these activities were reportedly undertaken under a preliminary-works permit, their physical and ecological effects are material to the environmental assessment and to establishing the pre-intervention ecological baseline.

Of particular concern is the sequence whereby physical intervention appears to have occurred

before completion of the environmental assessment process. Any subsequent EIA should therefore establish the pre-intervention ecological baseline, identify impacts already caused and determine any necessary restoration measures.

The complete permitting and procedural record remain important for establishing the precise scope and sequence of authorised activities, physical interventions and environmental assessment.

2.2 Protected areas, Emerald Network and project locations

A consolidated map is provided separately showing the relevant national protected areas and Emerald candidate site together with Vlora International Airport, the Zvërnec development and relevant associated or proposed infrastructure (see Annex 1).

The complainants recall the Bureau's clarification that assessment obligations are not limited to projects physically located within an Emerald candidate site's formal boundary. Projects outside those boundaries must also be assessed where they may significantly affect the site.

This is particularly relevant to Vjosa–Narta, where the developments addressed in this report affect areas within the protected landscape and the wider ecological complex. The delta, lagoon, salina, dunes, beaches, shallow marine areas and wetlands are ecologically interconnected. Their impacts therefore need to be assessed in relation to the ecological functioning of the site, rather than solely by reference to individual project footprints.

Authoritative and current geospatial information therefore remains necessary to establish the relationship between relevant developments, national protected areas, Emerald Network sites and the wider ecological system.

2.3 Cumulative impacts

The complainants consider the Bureau's request concerning cumulative impacts to be central to the present case.

Vlora International Airport, the Zvërnec tourism development and associated or foreseeable infrastructure affect the same interconnected marine, coastal, wetland and terrestrial system. Their combined effects cannot adequately be understood through assessment of individual project footprints alone.

Cumulative assessment should therefore consider the airport, tourism developments and associated or induced infrastructure together, including their combined effects on habitats and species, hydrology and ecological connectivity.

The complainants consider the appropriate assessment a necessity for the whole Vjosë–Nartë ecological complex. The assessment should also distinguish between the original ecological baseline, impacts already caused and potential future impacts.

2.4 Secretariat support for environmental assessment

The Bureau requested feedback concerning the support offered by the Bern Convention Secretariat in preparing the EIA for existing and new projects affecting the Vjosa–Narta

Emerald candidate site.

The complainants are not aware of publicly available information confirming whether this offer has been accepted, what support has been requested or provided, or how such support would be incorporated into the relevant environmental assessment processes.

The complainants therefore respectfully request the Bureau to seek clarification from the Albanian authorities on whether the Secretariat's offer has been accepted and, if so, on the status and scope of the technical support requested or provided.

2.5 Updated Emerald Network SDF

The Bureau noted in June that comprehensive information concerning the Vjosa–Narta Emerald candidate site had not been provided and that an updated SDF for the Emerald sites in Albania had not yet been submitted.

The complainants are not aware that the requested updated SDF has subsequently been made publicly available.

The updated SDF and associated ecological and spatial information remain important for establishing an authoritative conservation baseline against which existing and proposed developments can be assessed.

3. Material developments since June

3.1 Zvërnec

The most significant recent development concerns physical interventions at the Zvërnec site.

Field information available to the complainants records machinery, fencing, access works and other interventions affecting ecologically sensitive areas. A scientific field mission in June reported approximately 2,000 flamingos preparing to nest. The Vjosa-Narta protected area is known to be the host of more than 200 bird species. In July, 532 scientists petitioned the Albanian Government concerning potential irreversible impacts.

The complainants understand that works subsequently stopped and fencing and machinery were removed. This is welcome. However, suspension does not address ecological impacts that may already have occurred. These impacts need to be identified through environmental assessment and, where necessary, appropriate restoration measures determined and implemented.

Any subsequent EIA should therefore distinguish between the ecological baseline before physical intervention; impacts already caused; potential future impacts; necessary restoration measures.

3.2 Vlora International Airport (VIA)

The central implementation issue concerning Vlora International Airport remains unchanged. Construction works on site are ongoing. Adjacent to VIA new interventions took place: the construction of a new electricity station within the protected area has started without any public

consultation. It is meant to provide electricity to VIA and plans suggest that a new 100 MW photovoltaic plant will be connected with the station and be built within the protected area.

No new and sufficient EIA and appropriate assessment satisfying Recommendation No. 219 has been identified by the complainants. The requested structured cooperation concerning assessment and monitoring has likewise not taken place.

The period before possible certification and operation therefore remains an important preventive window for implementation of Recommendation No. 219, including comprehensive assessment of cumulative impacts and appropriate mitigation and restoration measures.

4. Conclusions and requested action

The information available to us indicates that the core requirements of Recommendation No. 219 remain outstanding. At the same time, physical interventions at Zvërnec occurred before completion of the full environmental assessment subsequently required, important information remains unavailable, and cumulative development pressures across the Vjosa–Narta ecological complex are increasing.

Taking them together, these developments reinforce the need for independent verification of conditions on the ground and continued preventive action while the substantive requirements of Recommendation No. 219 remain outstanding.

We, the complainants therefore respectfully request the Bureau to:

1. **Proceed with the on-the-spot appraisal deferred in June.**
The appraisal should cover Vlora International Airport, Zvërnec and relevant parts of the wider Vjosa–Narta ecological complex and assess implementation of Recommendation No. 219, conditions on the ground, cumulative impacts and any restoration needs. Relevant complainant organisations and independent scientific expertise should be included in the process.

2. **Maintain Case-file 2016/5 open and Recommendation No. 219 in force** until its substantive requirements have been implemented and implementation can be independently verified.

3. **Reiterate the need for effective preventive measures** so that further interventions capable of significantly affecting the Vjosa–Narta Emerald candidate site do not precede the required environmental and cumulative assessments and establishment of an adequate ecological baseline.

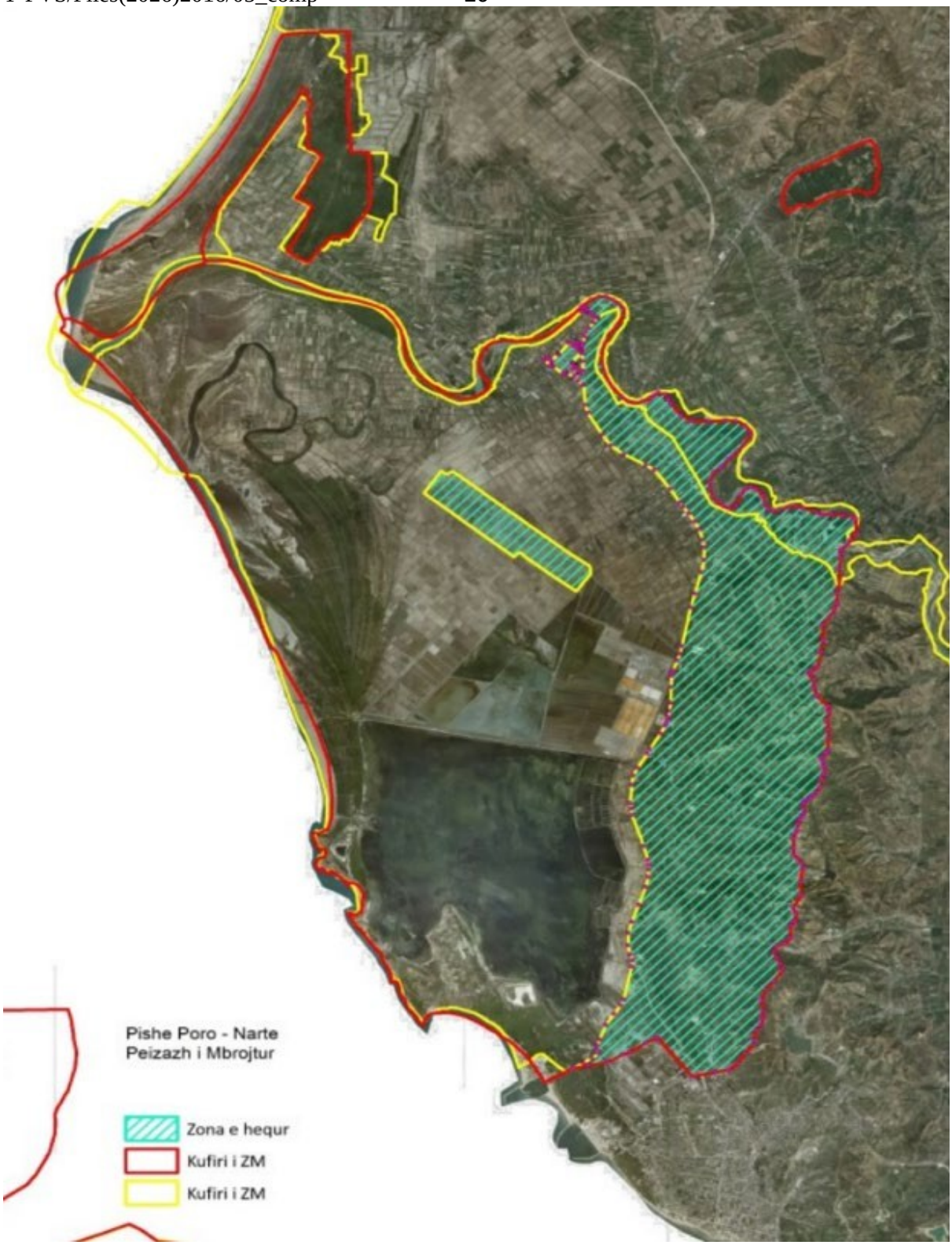
4. **Request outstanding information and a clear implementation timetable**, particularly concerning permits, authoritative spatial information, the updated SDF, environmental and cumulative assessments, technical support, biodiversity monitoring and restoration.

ANNEX 1 – maps

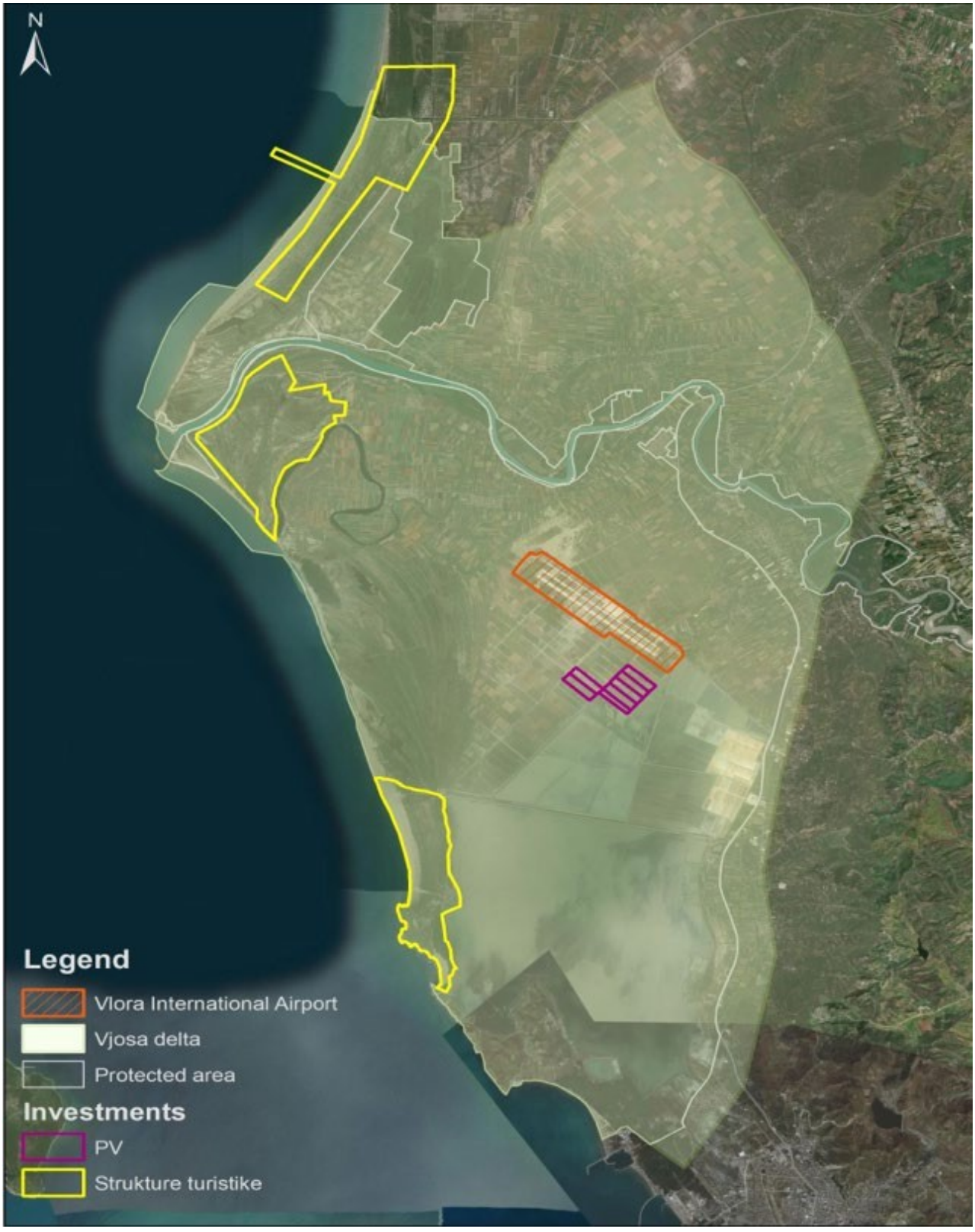
A consolidated and interactive map is provided showing the relevant national protected areas and Emerald candidate site together with Vlora International Airport, the Zvërnec development and relevant associated or proposed infrastructure.

Open the interactive map here:

Vjosa-Narta New developments – Google My Maps


Pishe Poro - Narte
Peizazh i Mbrojtur
Zona e hequr
Kufiri i ZM
Kufiri i ZM

Former and revised protected-landscape boundaries and removed areas. Yellow line: boundaries of Vjosa Wild River National Park and Pish Poro – Narta Protected Area. Green hatched area: removed areas from the Vjosa-Narta Protected Landscape.



GIS representation of tourism and energy infrastructure within the Vjosa Delta landscape (planned and under construction).

Progress Update for Standing Committee by the Complainants

Case-file 2016/5: Presumed negative impact of developments on the Vjosa River, including Vlora International Airport Prepared jointly by EcoAlbania, PPNEA and EuroNatur

To: Council of Europe | Bern Convention

Evidence cut-off: 15 October 2026

Submitted on: 28 October 2026

Abstract

The complainants' principal conclusion is that Recommendation No. 219 remains substantially unimplemented and the case-file should remain open.

Vlora International Airport remains the central unresolved issue. No new and sufficient EIA and Appropriate Assessment meeting Recommendation No. 219 have been demonstrated, while the required multi-year biodiversity monitoring, reassessment of alternatives and related safeguards remain incomplete or unverified. In March 2026, the CMS Standing Committee independently identified continuing deficiencies and urged suspension of construction and/or operation until they are addressed.

Physical interventions at Zvërnec, located inside Pishë Poro–Nartë Protected Landscape have created new urgency. In 2026, a large-scale tourism construction advanced in the area, preliminary works and physical intervention occurred before the project was required to undergo an in-depth EIA. This demonstrates that the cumulative development pressure repeatedly raised by the complainants is no longer hypothetical. The airport, tourism projects and associated infrastructure are increasingly interacting within the same Vjosa–Narta ecological system.

The Zvërnec EIA is therefore an important test of whether the cumulative and ecosystem approach required by Recommendation No. 219 will be applied in practice. Its scope must address the airport and other existing and reasonably foreseeable developments, protected species and habitats, ecological connectivity, alternatives and the pre-intervention ecological baseline. Key scoping documents related to EIA remain unavailable to the complainants, and meaningful public participation is essential. The Zvërnec EIA cannot, however, substitute for the separate airport EIA and Appropriate Assessment required by Recommendation No. 219.

These cumulative pressures are unfolding while incompatible provisions of Law No. 21/2024 on Protected Areas remain in force, despite their repeal being an explicit EU accession requirement. The updated Emerald Network Standard Data Form and related ecological and spatial information also remain outstanding.

The complainants therefore request the Standing Committee to keep the case-file open; reaffirm full implementation of Recommendation No. 219; prevent further airport construction, certification or operation pending compliance; require a robust cumulative Zvërnec EIA, restoration of damage and effective access to information and participation; complete the

Emerald Network information and reform the protected-area legal framework; and mandate an on-the-spot appraisal in 2027.

1. Status of implementation of Recommendation No. 219 (2023)

Recommendation No. 219 remains the principal benchmark for assessing Albania's response to the impacts of Vlora International Airport and related development pressures in the Vjosa–Narta area. The table below provides the complainants' assessment of implementation as of October 2026.

No.	Recommendation requirement	Status and key remaining gap
1	Suspend Vlora Airport pending a new sufficient EIA and Appropriate Assessment	**Not implemented.** Construction advanced without the new assessment required by the Standing Committee.
2	Conduct 2–3 years of comprehensive wildlife monitoring	**Not implemented / not demonstrated.** No complete multi-year programme meeting the Recommendation has been demonstrated.
3	Reassess genuine alternative airport locations	**Not implemented.** No new alternatives assessment based on the required monitoring has been demonstrated.
4	Revise the airport EIA and environmental safety measures	**Not implemented.** No revised airport assessment meeting the Recommendation has been completed; CMS identified continuing deficiencies in 2026.[1]
5	Obtain specialist bird/wildlife-strike expertise	**Not demonstrated.** Adequate site-specific specialist assessment has not been publicly demonstrated.
6	Apply an ecosystem approach to infrastructure planning	**Not demonstrated.** No comprehensive cumulative assessment of the Vjosa–Narta ecological system has been completed.
7	Integrate transport and green-infrastructure planning	**Outstanding.** No integrated framework protecting ecological connectivity has been demonstrated.
8	Strengthen institutional capacity	**Incomplete.** Assessment quality, monitoring, transparency and coordination concerns remain.
9	Protect the free-flowing Vjosa, including the delta/Narta area	**Partially implemented.** The Vjosa Wild River National Park is major progress, but significant

[1] Decision of CMS Review Mechanism. File no. 2021/01: Project Development at Vjosa-Narta Protected Landscape Albania. 22 March 2026, https://www.cms.int/sites/default/files/document/2026-07/cms_stc57_outcome1_e.pdf

		pressures on the river itself and the wider river–delta system remain.
10	Strengthen cooperation with stakeholders and NGOs	**Not implemented.** Albanian authorities have not taken any steps to achieving this recommendation. Moreover, timely access to information and effective participation remain concerns.
11	Complete Emerald Network data and integrate it into planning	**Outstanding.** The updated SDF and related ecological/spatial information remain incomplete.

2. Key developments in 2026 and implications for implementation

2.1 Zvërnec: new urgency and materialisation of cumulative development pressure

Developments at Zvërnec have created new urgency in this case. They do not replace the unresolved issues concerning Vlora International Airport, but they demonstrate why Recommendation No. 219 required an ecosystem and cumulative approach to development in the Vjosa–Narta area.

The complainants have repeatedly warned that the airport cannot be considered in isolation from wider development pressures affecting the Vjosa Delta–Narta ecological complex. During 2026, those concerns began to materialise. A large-scale multifunctional tourism development at Zvërnec advanced within the Pishë Poro–Nartë Protected Landscape, while the core airport-related requirements of Recommendation No. 219 remained unresolved.

According to information provided by the Albanian authorities, a development permit for the revised Zvërnec proposal was approved on 30 March 2026 and a permit for fencing and preliminary works followed on 29 April. The underlying permit documents have not been made publicly available, preventing independent scrutiny of their conditions, spatial coverage and legal basis. Physical intervention took place in late April and early May. Only on 15 May did the National Environment Agency determine that the project required an in-depth EIA before a construction permit could be issued. The sequence is significant since the **development and preliminary-work decisions had already advanced, and physical intervention had occurred, before the requirement for an in-depth environmental assessment was established.**

The September Bureau meeting explicitly noted the damage caused by the April–May intervention and requested information on possible restoration measures. It also reaffirmed that the cumulative effects of the airport, new development projects and the May works on the remaining Vjosa–Narta site must be duly assessed.

Zvërnec should therefore not be treated as a separate development dispute added to the airport case. It demonstrates that the broader cumulative-development pressure which Recommendation No. 219 sought to address is becoming concrete across the same ecological system. The ecological magnitude of these combined effects still requires proper assessment,

but the pattern of overlapping airport, tourism, energy and infrastructure development is no longer hypothetical.

The controversy has also exposed continuing governance and participation problems. The interventions in Zvërnec triggered sustained protests involving local residents, civil-society organisations, scientists and citizens, while concerns over access to project documentation and meaningful participation remained unresolved. This is directly relevant to Recommendation No. 219's requirements on institutional capacity and constructive cooperation with stakeholders.

The development pressure is also unfolding within a weakened protected-area legal framework. Law No. 21/2024 amended Albania's Protected Areas Law to permit a wider range of development activities in protected areas. The incompatible provisions remain an explicit concern under Albania's EU accession process, with the EU Common Position on Chapter 27 requiring their repeal. No such repeal has been verified to date. The situation at Zvërnec therefore illustrates not only a project-level assessment problem, but the wider risk created when development pressure advances under legislation that does not yet provide safeguards compatible with European nature-protection requirements.

2.2 Vlora International Airport: the unresolved core of Recommendation No. 219

Vlora International Airport remains the central unresolved element of the case. No new and sufficient airport EIA and Appropriate Assessment meeting point 1 of Recommendation No. 219 have been demonstrated. Albanian authorities took no action to address the Recommendation requirements related to the two-to-three-year biodiversity monitoring, reassessment of alternatives and other safeguards.

In March 2026, the CMS Standing Committee independently identified continuing shortcomings in the airport assessment, including deficiencies in species data, survey design, migratory routes, habitat use, long-term effects, Dalmatian pelican assessment, bird-strike risk, fragmentation, mitigation and compensation. CMS urged suspension of construction and/or operation until sufficient species data are available, the identified deficiencies are addressed, and adequate measures are in place.

Furthermore, according to the published agendas of the National Council of Territory (NCT) meetings, three additional development permits have been issued for large-scale tourism resort projects within the Vjosa–Narta Protected Landscape, namely "Zvërnec Touristic Village"[2] by Concord Investment, "Salterra"[3] by Turi M.Z.B, and "Arte Marea"[4] by Green Investment, raising further serious concerns about the cumulative environmental impacts of tourism development, the progressive degradation of protected habitats, and the compatibility of such developments with Albania's obligations under the Bern Convention.

Additional infrastructure associated with the airport also emerged during 2026. The complainants reported construction of a new electricity station two kilometers from the airport

[2] https://drive.google.com/file/d/1vioNYkjBXf1aes-C2MCZQDTMGR8826su/view?usp=sharing
[3] https://drive.google.com/file/d/1Eqn08APH7KPuhcNbO8l4Hou8-88BwJqW/view?usp=sharing
[4] https://drive.google.com/file/d/1UomP5jRQpk61PB12gRmcdlciPpG7lLTL/view?usp=sharing

area and on the edge of the protected area, and the September Bureau requested the Albanian authorities to provide further information on this development. The Bureau simultaneously reiterated that the authorities' position that the airport lies outside the present Pishë Poro–Nartë Protected Landscape boundary does not remove the need to assess its cumulative impacts on the remaining site.

These developments reinforce rather than diminish the relevance of Recommendation No. 219. The airport-specific assessment and monitoring requirements remain outstanding, while the surrounding development context has become more complex.

2.3 Zvërnec EIA: a critical test of the cumulative approach

The in-depth EIA now required for Zvërnec is an important test of whether the cumulative and ecosystem approach required by Recommendation No. 219 is being applied in practice. The Albanian Government has confirmed that the assessment will consider interactions with existing and planned development in the wider Vjosa–Narta area, including Vlora International Airport, and impacts on habitats, species, ecological connectivity and protected areas.

However, key documents defining the assessment remain unavailable to the complainants, including the formal Agjencia Kombetare e Mjedisi (AKM) (National Environment Agency) scoping notification and related institutional opinions, although the complainants requested this information. These documents are essential for establishing whether cumulative impacts, alternatives, protected species and habitats, ecological connectivity and the appropriate baseline have been incorporated into the formal assessment requirements. As of today, no official application has been submitted by the company to the AKM for the conduct of an Environmental Impact Assessment (EIA).

The baseline is particularly important because physical intervention occurred before the in-depth EIA procedure began. The altered condition created by the April–May works should not become the reference point for assessing future impacts. Furthermore, restoration of damage already caused must also remain distinct from mitigation of future project impacts.

The Government has confirmed that public consultation and a public hearing form part of the procedure. Timely disclosure of the draft EIA, supporting studies and project documentation will therefore be essential for effective participation before the assessment and environmental decision are finalised.

The EIA process may advance further before the December Standing Committee. Any new scoping, assessment or consultation documentation should consequently be considered in the Committee's assessment. The initiation of an EIA procedure should not itself be taken as evidence of compliance but its scope, evidence base, cumulative assessment and ability to influence the decision remain decisive.

Finally, the Zvërnec EIA cannot substitute for the outstanding airport obligations. Assessing Vlora Airport as a cumulative factor within the Zvërnec procedure does not fulfil the separate requirement under Recommendation No. 219 for a new sufficient airport EIA and Appropriate Assessment.

3. Wider Vjosa system and ecological baseline

Recommendation No. 219 extends beyond individual development projects and requires protection of the free-flowing Vjosa system, including the delta and Narta area. The designation of the Vjosa Wild River National Park represents major progress, but pressures across the wider basin remain. Monitoring in 2026 continued to identify significant water abstraction, while permit and flow data remained incomplete, namely artificial barriers, gravel extraction, pollution, wastewater and other pressures also require continued basin-wide monitoring and management.

At Vjosa–Narta, the ecological information needed to guide assessment and planning also remains incomplete. Albania has initiated work linked to Natura 2000 preparation and updated habitat and species assessments, but the updated Emerald Network Standard Data Form and associated ecological and spatial information remain outstanding. This information is particularly important as development decisions and environmental assessments are advancing across the same ecological complex.

The implementation of Recommendation No. 219 should therefore continue to be assessed at the scale of the connected Vjosa river–delta–lagoon–coastal system. Project-level assessments and national protected-area boundaries alone cannot provide the ecological baseline or cumulative perspective required to safeguard its integrity.

4. Conclusions and requests to the Standing Committee

Developments in 2026 extensively confirm the need for full implementation of Recommendation No. 219. Its core airport-related requirements remain outstanding, while additional development pressures in Vjosa–Narta demonstrate the consequences of continuing to address projects separately rather than through the ecosystem and cumulative approach required by the Recommendation.

The Zvërnec development has created particular urgency. Physical intervention occurred before completion of an in-depth environmental assessment, while the scale of the proposed development and its interaction with Vlora International Airport and other existing and planned infrastructure require assessment across the wider ecological system. The initiation of an in-depth EIA is therefore important, but cannot in itself demonstrate compliance, nor can it substitute for the outstanding airport-specific obligations under Recommendation No. 219.

The complainants respectfully request the Standing Committee to:

1. **Keep case-file 2016/05 open and reaffirm the full implementation of Recommendation No. 219 as the benchmark for the case**, with continued reporting until its requirements are implemented and independently verifiable.

2. **Reaffirm the requirements concerning Vlora International Airport**, including that no further construction, certification or operation should proceed until the new and sufficient EIA and Appropriate Assessment required by Recommendation No. 219 are completed, supported by the required biodiversity monitoring, alternatives assessment and wildlife-risk expertise.

3. **Require the Zvërnec in-depth EIA to address the full cumulative development context of Vjosa–Narta**, including Vlora International Airport, associated infrastructure and other existing and reasonably foreseeable developments, and to assess impacts on protected species and habitats, ecological connectivity, alternatives and the pre-intervention ecological baseline. Albania should provide the formal AKM scoping notification, related institutional opinions and relevant project documentation in time for meaningful public participation.

4. **Require that no further physical intervention at Zvërnec prejudge the outcome of the EIA process**, and that damage caused by the April–May 2026 intervention be addressed through a separate, time-bound restoration plan based on the pre-intervention ecological condition and subject to appropriate monitoring.

5. **Require completion and disclosure of the updated Emerald Network Standard Data Form and associated ecological and spatial information**, together with timely and effective public access to the environmental documentation necessary for assessment and participation.

6. **Call on Albania to repeal or amend the incompatible provisions of Law No. 21/2024 on Protected Areas**, and, pending such reform, to ensure that no new development decisions within or affecting the Vjosa–Narta ecological complex weaken the level of protection required under the Bern Convention and Recommendation No. 219. Encourage Albania to not engage in any construction activities within Protected Areas, until this reform is implemented.

7. **Mandate an on-the-spot appraisal in 2027** to independently assess implementation of Recommendation No. 219 and the cumulative situation across Vlora International Airport, Zvërnec and the wider Vjosa Delta–Narta ecological complex, including restoration needs and the status of relevant Emerald Network features. The appraisal should involve the complainants and relevant independent expertise and, where appropriate, be coordinated with institutions like CMS.

8. Request Albania to submit a consolidated, time-bound implementation plan for Recommendation No. 219, no later than the first Bureau meeting of 2027, setting out for each outstanding requirement the responsible authority, concrete action, deadline, milestones and evidence by which the implementation can be verified. The plan should operationalise the existing Recommendation and must not reopen, replace or postpone obligations already established by the Standing Committee.

The complainants further request that any material developments occurring between the present reporting deadline and the December Standing Committee meeting including publication of EIA scoping documents, a draft EIA or consultation materials be taken into account when the case is considered.