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AND NATURAL HABITATS

Standing Committee

46th meeting

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Bureau of the Standing Committee

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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.

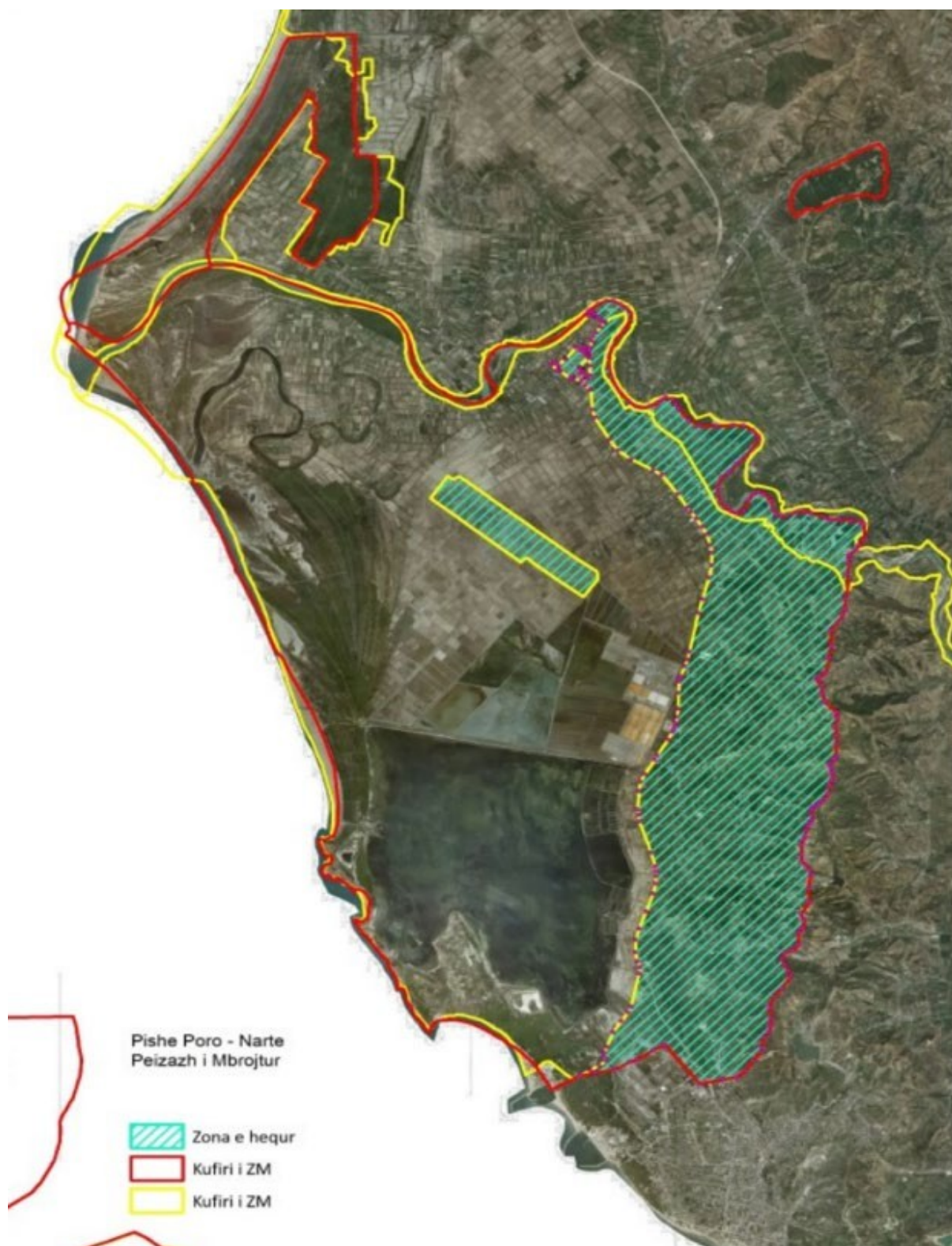
4. Request outstanding information and a clear implementation timetable, particularly concerning permits, authoritative spatial information, the updated SDF, environmental and cumulative assessments, technical support, biodiversity monitoring and restoration.

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](#)



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).