



Strasbourg, 20 January 2026

T-PVS/Files(2026)2023-01_comp

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

46th meeting
Strasbourg, 7-11 December 2026

Bureau of the Standing Committee

7-9 April 2026,
Strasbourg

Complaint on Stand-by: 2023/01

**Alleged habitat destruction due to the construction of the Skavica
Hydropower Plant on the Drin River (Albania)**

-COMPLAINANT REPORT-

*Document prepared by
Earth Law Center – USA & Earth Thrive - UK, on behalf of Opposition to Skavica Dam - OSD (Albania),
Group of Rural Activists of Dibra-GARD (Albania), North Green Association (Albania), and GLV
Integrimi (Albania)*

To: Secretariat of the Bern Convention

From: Earth Law Center – USA & Earth Thrive - UK, on behalf of Opposition to Skavica Dam-OSD (Albania), Group of Rural Activists of Dibra-GARD (Albania), North Green Association (Albania), and GLV Integrimi (Albania)

Re: Report on Complaint n°2023/1 re: the Skavica Hydropower Plant on the Drin River (Albania)

Dear Secretariat:

Please take note of the following updates regarding complaint n°2023/1 re: the Skavica Hydropower Plant (HPP) (or Skavica Hydropower Project) on the Black Drini River (Albania). Thank you so much for your consideration.

1. Abstract: Let the River Flow

Dibra is one of the richest regions in terms of natural and cultural heritage. The Black Drini River, which has flown freely for centuries, is not merely a source of water - it is a source of life, of identity, of collective memory. Every bend of that river holds stories; entire stretches of fields, rolling hills and mountains hold the whispers and footsteps of generations who have lived with the Drin River in a union of dignity and efforts.

Building the Skavica HPP means submerging entire villages, little spread out communities who have for long, merged with surrounding nature and precious habitats. It means forcing out people who do not want to leave and ultimately destroying a way of life that is irreplaceable. Instead of investing in sustainable development - like organic agriculture, tourism, infrastructure development and preservation of heritage and nature's riches - by building Skavica HPP, we are choosing a misguided and short-sighted path: pouring concrete over nature.

This project cannot be justified on development grounds. Albania's energy needs are already met through existing and planned projects, and viable alternatives exist that would avoid severe environmental and social harm. The Skavica HPP has advanced without genuine public debate or meaningful consultation, relying instead on one-sided, imposed decision-making. If pursued, the project would irreversibly impair the Black Drin landscape - ecosystems, cultural heritage, and the way of life of local communities - in ways that can never be undone, largely killing this living system. For these reasons, the project should be abandoned before such harm are unavoidable.

2. Status of the Project

Since the last update, the NGOs co-complainants continued to be engaged with the community, stakeholders as well as KESH (the Albanian Power Corporation) and other government entities about the project.

It should be highlighted that requested information on the project has not been given in accordance with the relevant laws, as well as those conventions ratified in law in Albania.

Based on the information obtained so far from KESH, the status of the Skavica HPP as of December 2025 is as follows:

- The field investigations and studies have been completed, including the technical reports and the preliminary design by the consultant Bechtel. According to legal provisions, the technical opposition for the technical reports and the preliminary design has been carried out by the Albanian Polytechnic University of Tirana (UPT).
- The technical report of the Environmental and Social Impact Assessment (ESIA), which was prepared by Bechtel and Golder, in accordance with national legislation and IFC standards, has been submitted. The technical report of the ESIA will take its final form after review by KESH and an independent third party.
- The Financial Advisor has carried out assessments regarding the bankability of KESH, the financial feasibility of the project, as well as market research for financial institutions regarding the project financing alternatives, which are still ongoing.
- The above reports will be shared with the public after they have passed the administrative review process by the stakeholders involved, both within and outside KESH, and have taken their final form.
- The decision regarding the continuation of the project will be taken by the Council of Ministers, after there is a commitment to finance the Skavica Project from financial institutions, and after the above reports have taken their final form.

3. Expected Timeline of the Project

According to the information provided above by KESH, the following steps are not yet completed in terms of the Skavica HPP, during the current first phase:

- Even though submitted to KESH, the Technical Report of the ESIA will be finalized following a review within KESH and an independent third party. This report involves technical information on the dam site and total area to be flooded.
- The report by the Financial Consultant for the project financing alternatives is still not finalized (as of December 2025).

Following the expected finalization of these steps, the final project will be submitted to the Government of Albania (GoA) for approval via a Council of Ministers Decision (CMD). It is expected that the impending CMD will contain information on the following:

- Dam's exact location, type, height;
- Project area (area to be flooded);
- Type of financing the project;

- Entity to finance the project; and
- Area where the people will be re-settled.

Once the CMD will be issued, KESH will re-apply with the National Environment Agency (NEA), for the permission to carry out the in-depth ESIA process for the approved project by the GoA.

4. Expected ESIA Timeline

Completed steps of the ESIA for the Skavica HPP so far:

- All studies to determine preliminary environmental and social impacts of the project as well as the technical studies were completed at the end of 2022.
- On 18.01.2023, KESH submitted to the NEA the request to carry out an in-depth ESIA process for the project, submitting the following documents:
 - Interactions ESIA Scoping Report which contains expected environmental impacts via literature and field inspections covering all seasons as well as social impacts via previously gathered information and inputs received from different actors.
 - A technical report had four dam options, without specifying the preferred alternative by KESH.
- In Jan 2024, the KESH application was rejected by the NEA based on the following grounds:
 - Information about copies of permissions, authorizations and licenses available to the developer (KESH) is missing in the proposed project.
 - KESH must specify the optimal variant of the scenario with precisely defined technical data for which Skavica HPP is built, presenting it with a map and coordinates.
 - The contract between KESH and Bechtel Limited–Branch in Albania is not signed and not dated.

Forthcoming ESIA process:

Following the approval of the project by the government, the new KESH re-application with the NEA will contain:

- The already submitted Interactions [Scoping Report](#) on the Environment and Social impacts (as per above KESH affirmation).
- The newly approved Technical Report of the ESIA, with only one dam option (the one contained in the final project to be approved by the GoA via DCM).

If the NEA will approve the new application of KESH for the in-depth ESIA, the rest of the process will consist of:

- Public hearing meetings with affected communities organized in a handful of locations (likely in a span of one month or two).
- The information to the public will consist of the already submitted reports in the NEA application (see above), summarized.
- The above process would apply under a regular procedure. We would like to highlight, however, that a regular process is not the norm for all projects in Albania requiring an in-depth ESIA. Meetings are often conducted formally to complete the required paperwork; media reports have indicated that, in some cases, meeting minutes and participants' signatures were forged. As a result, some HPP projects have ended up in court, pitting communities against developers. Generally, in most public consultation processes, hardly any changes to the initial project were effected.
- The upcoming Skavica HPP ESIA process will conclude with the approval of the final reports of the in-depth ESIA process for the project to enter the second phase, during which time the dam would be built by Bechtel.

Based on the above process, the affected communities and relevant civil society actors will be informed about a project which has already been approved by the government in all key aspects, such as the area to be flooded or area to be re-settled.

Once the project is approved by the CMD, there is imminent risk that the envisioned in-depth ESIA process will do nothing to change it, if needed or requested by the communities. This is because affected communities and civil society actors, having been kept in the dark and not consulted during the project's inception (as evidenced in the decision of the Constitutional Court on the Skavica HPP case), as well as the development and approval phases, will have no real leverage to effectively change problematic aspects of the project, either socially or environmentally related.

5. Status of Skavica HPP Case File Project Risks and Mitigations

As stated, we have no confidence that the project's design or the upcoming in-depth ESIA process will mitigate identified risks to the project.

In our view, the concerns raised during the review of the Skavica HPP case file by the Bern Convention, have been largely ignored by the Government, in its regular updates. We believe this stems from the fact that these risks are not addressed in the project's design.

For instance, GoA reports have not covered listed violations in our original complaint or areas for which Bern Bureau has requested updates, such as protected species listed within the Convention's annexes and resolutions, impacts on the Balkan Lynx Recovery Programme, the impact of the HPP

project on Black Drini as a candidate Emerald Network site, and cumulative negative impacts on western Balkan lakes (two in Albania, namely Ohrid and Shkodra) and large carnivores.

In particular, the project risks destroying the Black Drini River as a candidate site for the emerald network, but the GoA has not indicated in its update reports what measures are planned, if any.

As previously reported, Black Drini River, as per the results of the 2011 biogeographical seminar, is a top priority for the Emerald site and should be protected against impacts from the Skavica HPP. This project risks destroying the only remaining biocorridor used by the Balkan lynx between the populations in Albania and North Macedonia, extensive riparian forests of alder, willow and poplar habitats, seminatural meadows and pasture, thermophilic oak forests, many species of birds, the Hermann's tortoise and fish species present in Black Drin and its tributaries – with 6 species of European importance (many of which are endemic to the Balkans and even the Drin basin) having been identified during the Emerald Green webinar in 2022. These include *Eudontomyzon spp.*, *Cobitis ohridana*, *Barbus rebeli*, *Rutilus ohridanus*, *Pelagius ohridana*, *Salmo farioides*.

Despite the above, the Interactions Scoping ESIA Report (link above) simply states that flooding of the project area will result in habitat loss and increased fauna mortality (see Table 4). On critical habitats, it is accepted that there will be permanent loss, with no mitigation measures whatsoever. Similarly, as the only remaining biocorridor of the Balkan lynx between the population in Albania and North Macedonia lies near the village of Skavice, where the dam will be built; if the project continues in the current footprint, no mitigation measure is possible or proposed by KESH. The same situation pertains to other protected habitats and species endemic to the Black Drini Valley.

NEA itself proposed specific, additional risk mitigation measures during [its review](#) of the Interactions Scoping ESIA report submitted by KESH in its initial application for the in-depth ESIA, however, as stated during the explanation of the expected ESIA timeline above, it is unlikely that they will be considered. Furthermore, according to the Regional Environmental Agency for Tirane, Durres and Diber, the project [fails to](#) include **detailed** information and mitigation on key risks, such as air protection and pollution, data on forest and pasture areas to be flooded for the dam infrastructure and most importantly, the reservoir, as well as all the wood, shrubby and herbaceous species in the area proposed for development.

In this view, we would like to ask the Bern Convention to elevate the risks involved and request measures by the GoA, which in our opinion would entail significantly reducing the project's footprint, although we believe ultimately, they must **cancel the project**. Overall, we are of the opinion that no adequate measures to protect the environment and biodiversity of Drini River are possible, if such a large dam will be built, flooding [an extensive area](#), practically all the Black Drini Valley from the border with North Macedonia, up to Kukes in northeast of Albania.

6. The EU Parliament Calls for the Cancellation of the Skavica HPP Project

On 9 July 2025, the European Parliament adopted by majority vote the European Commission's progress report on Albania for the year 2023/2024. In [point 58 of the resolution](#), it states:

*Calls on the Albanian authorities to effectively designate and manage key protected areas for the survival of critically endangered species, in particular the Balkan lynx, including comprehensive biodiversity monitoring programmes, and to strictly implement legislation against illegal hunting; **urges Albania to abandon plans for the Skavica hydroelectric power plant on the Drin i Zi River given its severe ecological, social and cultural impacts, including the displacement of local communities.***

This project was also included in the latest [EC Progress report for Albania](#), where it is stated:

The environmental risks of the Skavica hydropower plant project to ecosystems and local communities persist. Albania should advance the identification, pre designation, and protection of the sites that will be covered by the Natura 2000 network.

7. Potential Nationwide Negative Ramifications from the Skavica HPP

According to information obtained by the Opposition to Skavica Dam NGO, the cost of the Skavica HPP has soared and is significantly higher than the cost propagated by the GoA in 2020, when this project started.

Given this estimate, it is likely that one of the measures proposed to service the debt that may be required for Skavica dam construction and operation, would be to increase electricity prices for common households across the country. Currently, the GoA classifies the project as semi-matured ([Decision no. 91, dated 12.02.2025](#)).

Another similar Skavica HPP, with a dam option at the flood level of 441m above sea level, [was abandoned](#) by the GoA in 2016, based on the conclusion: *The utilisation Alternative with 1 Dam (Skavica 441) results ineffective due to high environmental and social impact as well as the immense costs for the population displacement.*

As a conclusion, the Skavica HPP carries enormous financial, operational, environmental, and social risks. Among them are the following:

- Environmental and social risks, including mass displacement and destruction of ecosystems within the Black Drini River basin.
- Construction risks, including delays and cost overruns.
- Operational risks, such as seasonal generation variability and long-term maintenance expenses.

Thank you so much for your consideration of our update.