

To:

Mrs. Ursula von der Leyen, President of the EU Commission
Mr. Maroš Šefčovič, Executive Vice-President of the EU Commission
Mr. Virginijus Sinkevičius, Commissioner for Environment, Oceans and Fisheries
Mr. Olivér Várhelyi, Commissioner for Neighbourhood and Enlargement

CC :

Mr. Kurt Vandenberghe, Director General, Directorate General for Climate Action (DG CLIMA)
Mrs. Florida Fink-Hooijer, Director General, Directorate General for Environment (DG ENVI)
Mr. Gert Jan Koopman, Director General, Directorate General for Neighbourhood and Enlargement Negotiations (DG NEAR)

Object : Urgent intervention needed on Vlora International Airport construction

Dear President von der Leyen,
Dear Vice-President Maroš Šefčovič
Dear Commissioner Sinkevičius,
Dear Commissioner Várhelyi,

On behalf of 33 nature conservation organisations, we are seeking your immediate attention and intervention regarding the construction of an international airport in the Vjosa-Narta Protected Area in Albania - one of Europe's last untouched and traditionally managed wetlands.

The Vjosa-Narta area, an emblem of Mediterranean biodiversity on the Eastern Adriatic coast, is a crucial stop for birds that migrate between Europe and Africa and one of the most important wetlands in the whole Adriatic Flyway. This precious habitat is home to numerous species of both global and EU concern, making this area a valuable candidate for the Emerald Site designation, an Important Plant Area, an Important Bird Area, a Key Biodiversity Area, and a potential Natura 2000 site.

Unfortunately, in a decision that goes against the spirit of environmental conservation and sustainable development, the Albanian government has approved the hasty construction of the Vlora International Airport within this protected territory. The European Commission itself, in the country progress report of 2022¹, aptly captured the severity of this action by noting: "*Construction works for the new Vlora Airport within the Vjosa-Narta Protected Area started in December 2021, are in contradiction with national laws and international biodiversity protection conventions that have already been ratified*".

The recent position taken by the European Parliament in July 2023, as articulated in paragraph 83 of the Committee on Foreign Affairs report², echoes our concerns and those of other global conservation entities. It "*urges the Albanian Government to halt projects that risk violating national and international biodiversity protection*

¹ European Commission, Albania 2022 Report (SWD(2022) 332), 12 October 2022. Available at https://neighbourhood-enlargement.ec.europa.eu/albania-report-2022_en

² European Parliament, Resolution 83 on the 2022 Commission Report on Albania adopted by the Committee on Foreign Affairs on 12 July 2023 (A9-0204/2023), available at https://www.europarl.europa.eu/doceo/document/A-9-2023-0204_EN.html

norms, such as Vlora International Airport, and to stop hydropower development in protected areas". This stance underlines the need for Albania to uphold both national and international biodiversity protection standards.

The Standing Committee of the Bern Convention on the Conservation of European Wildlife and Natural Habitats has also weighed in on the matter, stressing the importance of suspending the airport's construction. The recent recommendation n°219 (2023) adopted on the 5th of September 2023 by the Standing Committee asks the Albanian Government to: *"suspend 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."*³

Given the recent initiation of accession negotiations between the EU and Albania in July 2022, and the ongoing screening process, the timing is poignant. Albania's journey towards EU accession not only entails an alignment of political and economic systems but also embracing the values that the European Union stands for and progressively adapting its national laws with EU legislation, referred to as the "acquis". This includes rules on sustainable development and environmental conservation.

Therefore, it is pivotal for the Albanian government authorities to understand the preservation of natural heritage is non-negotiable and development should never come at the expense of irreplaceable biodiversity.

We appreciate the Commission's efforts in guiding Albania towards EU standards and norms. Aligning with these efforts, we respectfully request your prompt intervention against the construction of the Vlora International Airport. With this in mind, we ask the Commission to consider the following actions:

- To initiate high-level diplomatic discussions with the Albanian government. This might include meetings with key ministers or even the head of state to express the EU's concerns and seek amicable resolutions.
- To offer technical assistance, including expertise in environmental impact assessments (EIA) of the airport and sustainable development.
- To work closely with global conservation entities, like the Bern Convention's Standing Committee, to bolster their recommendations and calls for halting the project.
- To make further financial support conditional upon Albania halting the construction of the airport and potentially delaying the accession process until environmental concerns are addressed.

By strategically employing these actions, the Commission can exert substantial pressure on the Albanian government to reconsider its stance on the Vlora International Airport construction, aiming for a solution that prioritises environmental conservation and is in line with the goals of the European Green Deal, EU environmental law, EU Biodiversity Strategy and EU Nature Restoration Law.

Albania stands at the cusp of a transformative journey with the European Union. Together, let us ensure that this journey celebrates not only economic growth and political unity but also the safeguarding of our shared natural treasures for generations to come.

Thank you for your attention to this urgent matter. We look forward to your support and decisive action.

Sincerely,

³ Bern Convention, [Recommendation 219 \(2023\)](#) on the possible impacts of infrastructure and urbanisation developments particularly Vlora International Airport, on the Vjosa-Narta Protected Area

Signatures



euRONATUR



Doğa



1. Tour du Valat Foundation (France)
2. Wetlands International Europe (Belgium)
3. Birdlife Europe and Central Asia (Belgium)
4. Euronatur Fondation (Germany)
5. Protection and Preservation of Natural Environment in Albania (Albania)
6. Albanian Ornithological Society (Albania)
7. WWF North Africa (Tunisia)
8. Center for Protection and Research of Birds (Montenegro)
9. Algerian National Association of Ornithology (Algeria)
10. Association "Les Amis des Oiseaux" (AAO/BirdLife in Tunisia)
11. Institute for Nature Conservation in Albania (Albania)
12. Mediterranean Institute for Nature and Anthropos - MedINA (Greece)
13. Society for the Protection of Nature in Lebanon (Lebanon)
14. Association Biom (BirdLife Croatia)
15. Society for the Protection of Prespa (Greece)
16. Rewilding Europe (The Netherlands)
17. Lithuanian Ornithological Society (Lithuania)
18. BirdLife Sweden (Sweden)
19. Czech Society for Ornithology (Czech Republic)
20. Romanian Ornithological Society (Romania)
21. Ornithological Society "Naše ptice" (Bosnia and Herzegovina)
22. natur&environment (Luxembourg)
23. Mediterranean Small Islands Initiative - PIM (France)
24. WWF Spain (Spain)
25. Ornithological Research Center (Turkey)
26. Mediterranean Sea and Coast Foundation - MEDSEA (Italy)
27. Grupo de Estudos de Ordenamento do Território e Ambiente - GEOTA (Portugal)
28. Fuglavernd / BirdLife Iceland (Iceland)
29. DOGA / BirdLife Turkey (Turkey)
30. The Royal Society for the Conservation of Nature - RSCN (Jordan)
31. BirdLife Finland (Finland)
32. Macedonian Ecological Society (Macedonia)
33. Bulgarian Society for the Protection of Birds (Bulgaria)
34. BirdLife Israel/Society for the Protection of Nature in Israel (Israel)

ANNEXES

Annex A : List of Potential protected species present on the site from the IUCN Red List

Phylum	Scientific_Name	Common name in English	Red List category
ARTHROPODA	<i>Buprestis splendens</i>	The Goldstreifiger	EN
	<i>Astacus astacus</i>	The European crayfish	VU
BASIDIOMYCOTA	<i>Tricholoma acerbum</i>	The Bitter Knight	VU
CHORDATA	<i>Sardinella maderensis</i>		VU
	<i>Oxynoemacheilus pindus</i>		VU
	<i>Valencia letourneuxi</i>	The Corfu toothcarp	CR
	<i>Dentex dentex</i>	The Common Dentex	VU
	<i>Epinephelus marginatus</i>	The Dusky grouper	VU
	<i>Labrus viridis</i>	The Green wrasse	VU
	<i>Pomatomus saltatrix</i>	The bluefish	VU
	<i>Trachurus trachurus</i>	The Atlantic horse mackerel	VU
	<i>Umbrina cirrosa</i>	The shi drum	VU
	<i>Balistes capriscus</i>	The gray triggerfish	VU
	<i>Mola mola</i>	The ocean sunfish	VU
	<i>Pelophylax shqipericus</i>	The Albanian water frog	VU
	<i>Clanga clanga</i>	The Greater Spotted Eagle	VU
	<i>Anser erythropus</i>	The Lesser White-fronted Goose	VU
	<i>Aythya ferina</i>	The Common pochard	VU
	<i>Oxyura leucocephala</i>	The white-headed duck	EN
	<i>Streptopelia turtur</i>	The Turtle Dove	VU

<i>Podiceps auritus</i>	The horned grebe	VU
<i>Puffinus mauretanicus</i>	The Balearic shearwater	CR
<i>Puffinus yelkouan</i>	The Yelkouan Shearwater	VU
<i>Carcharhinus falciformis</i>	The Silky shark	VU
<i>Carcharhinus limbatus</i>	The Blacktip shark	VU
<i>Carcharhinus longimanus</i>	The Oceanic whitetip shark	CR
<i>Carcharhinus plumbeus</i>	The Sandbar shark	EN
<i>Galeorhinus galeus</i>	The School shark	CR
<i>Mustelus mustelus</i>	The common smooth-hound	EN
<i>Mustelus punctulatus</i>	The Blackspotted smooth-hound	VU
<i>Scyliorhinus stellaris</i>	The nursehound	VU
<i>Sphyrna mokarran</i>	The Great hammerhead shark	CR
<i>Sphyrna zygaena</i>	The smooth hammerhead shark	VU
<i>Alopias vulpinus</i>	The Common thresher shark	VU
<i>Carcharias taurus</i>	The Sand tiger shark	CR
<i>Carcharodon carcharias</i>	The Great white shark	VU
<i>Cetorhinus maximus</i>	The Basking shark	EN
<i>Isurus oxyrinchus</i>	The Shortfin mako shark	EN
<i>Isurus paucus</i>	The Longfin mako shark	EN
<i>Lamna nasus</i>	The porbeagle	VU
<i>Odontaspis ferox</i>	The smalltooth sand tiger	VU
<i>Aetomylaeus bovinus</i>	The Bull ray	CR
<i>Bathytoshia lata</i>	The Broad stingray	VU
<i>Dasyatis pastinaca</i>	The Common stingray	VU
<i>Gymnura altavela</i>	The Spiny butterfly ray	EN
<i>Mobula mobular</i>	The Devil ray	EN

	<i>Myliobatis aquila</i>	The Common eagle ray	CR
	<i>Rhinoptera marginata</i>	The Lusitanian cownose ray	CR
	<i>Leucoraja circularis</i>	The Sandy ray	EN
	<i>Leucoraja fullonica</i>	The Shagreen ray	VU
	<i>Raja radula</i>	The Rough ray	EN
	<i>Raja undulata</i>	The Undulate ray	EN
	<i>Rostroraja alba</i>	The white skate	EN
	<i>Glaucostegus cemiculus</i>	The Blackchin guitarfish	CR
	<i>Rhinobatos rhinobatos</i>	The Common Guitarfish	CR
	<i>Echinorhinus brucus</i>	The Bramble shark	EN
	<i>Oxynotus centrina</i>	The Angular rough shark	EN
	<i>Squalus acanthias</i>	The Spiny dogfish	VU
	<i>Torpedo marmorata</i>	The Marbled electric ray	VU
	<i>Torpedo torpedo</i>	The Common torpedo	VU
	<i>Balaenoptera physalus</i>	The Fin whale	VU
	<i>Physeter macrocephalus</i>	The Sperm Whale	VU
	<i>Miniopterus schreibersii</i>	The Bent-winged bat	VU
	<i>Myotis capaccinii</i>	The Long-fingered bat	VU
	<i>Chelonia mydas</i>	The Green sea turtle	EN
	<i>Dermochelys coriacea</i>	The Leatherback sea turtle	VU
	<i>Eretmochelys imbricata</i>	The Hawksbill turtle	CR
CNIDARIA	<i>Cladocora caespitosa</i>	The Cushion coral	EN
MOLLUSCA	<i>Haliotis tuberculata</i>	The Green ormer	VU
	<i>Codringtonia neocrassa</i>		VU

Annex B : Submersion map of the Narta Lagoon

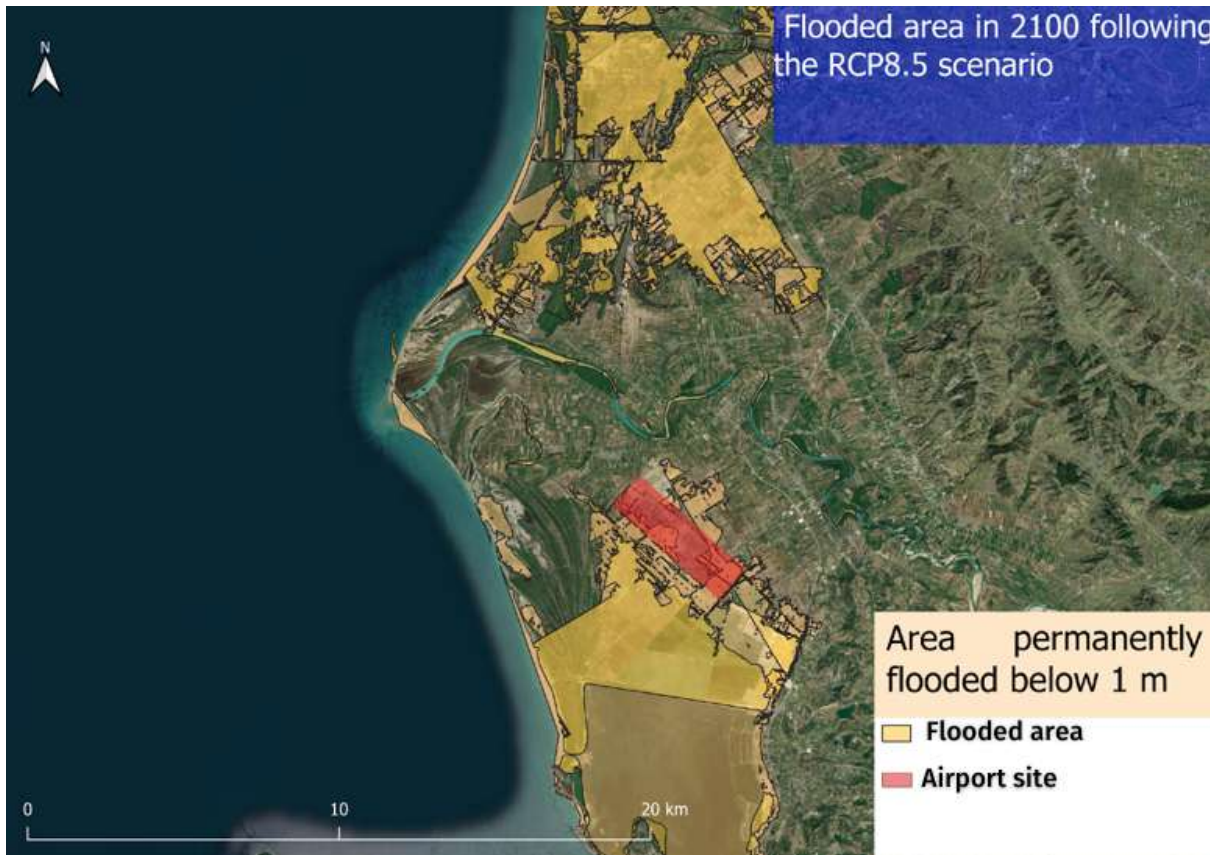


Figure 1 : Submersion map +1m in 2100, RCP8.5 scenario © Emanuele Ingrassia - A coastal morpho-dynamic evolution in south of Albania from the project GREEN and BLUE CoAL-ITion (NATURALBANIA) - 2023

Taking into account also the value of Sea Rise Level (SRL) of RCP 8,5 provided by the IPCC report, permanent flooded area maps were obtained for the minimum and maximum value of mean sea level, being SRL equal to : SRL = 0,8 ± 0,2m

SRL of 1m = 151,02 km²

Annex C : Flow movement of birds in the migration period in Narta Lagoon

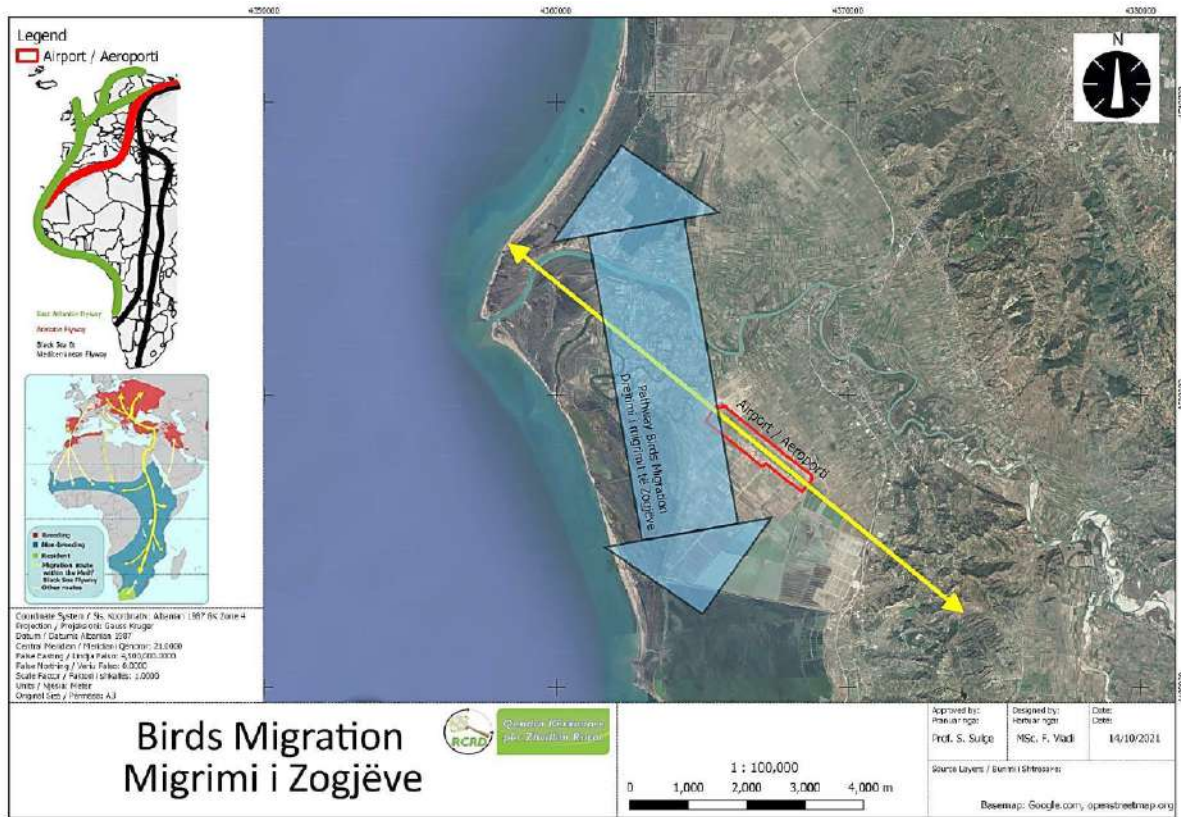


Figure 2 : Flow movement of the birds during the migration period. © F. Vladi & S. Sulçe, 2021 – from Non-technical summary of in-depth report of EIA Vlora International Airport -

Annex D : Noise Map of the Vlora airport with noise influence zones of north part of Narta Salina and the Delta zone of Vjosa River

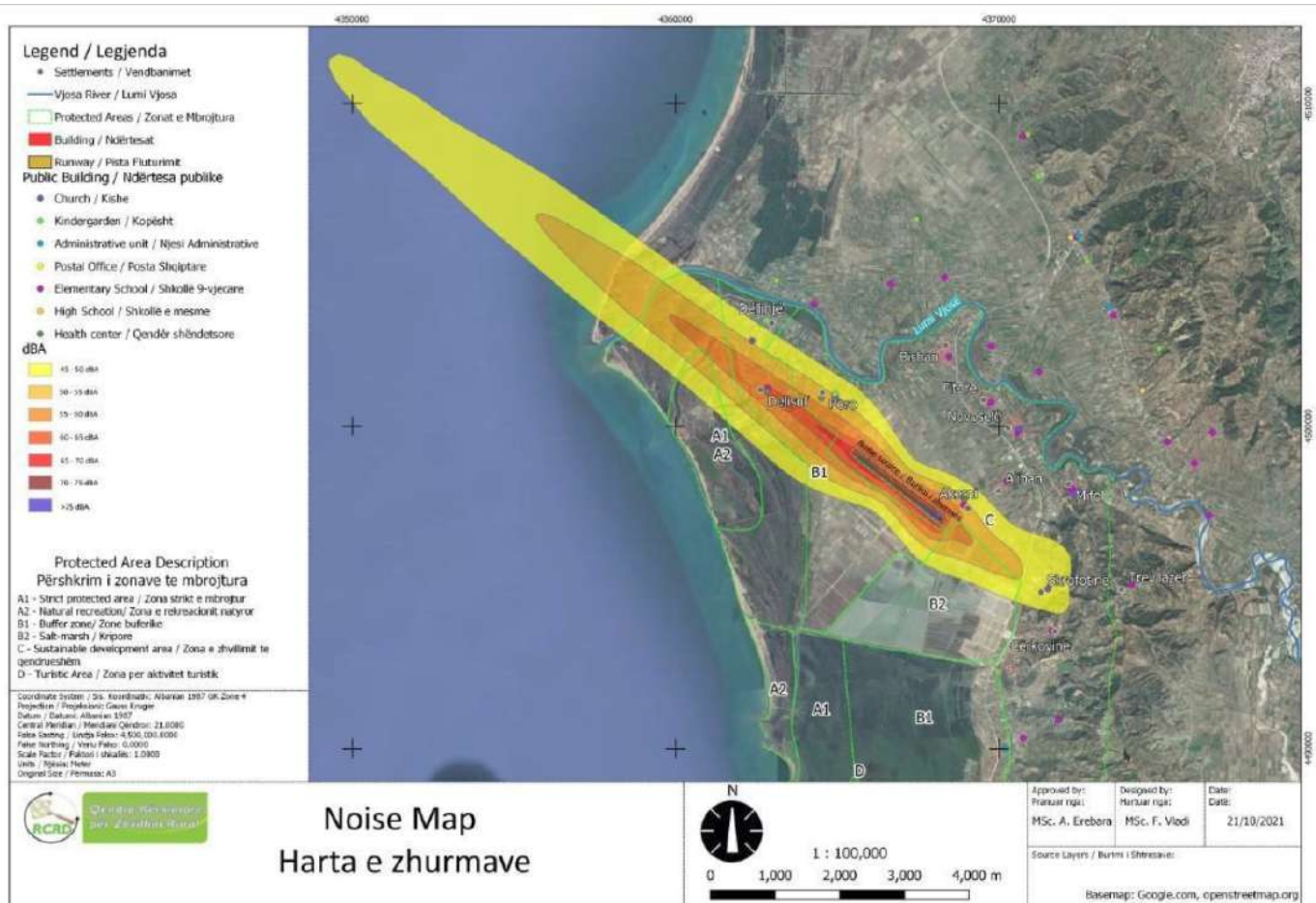


Figure 3 : Noise Map of the Vlora Airport © F. Vlodi & S. Sulçe, 2021 – from Non-technical summary of in-depth report of EIA Vlora International Airport

Annex E : Alternative locations proposed

Legend

- Vjosa Narta Protected Landscape
- Current location of Vlorë Airport
- Alternative 2 (Levan) *
- Alternative 3 (Kafaraj) *
- Alternative 4 (Risili) *

*All these alternative locations would require a proper Environmental Impact Assessment.

The first alternative to consider is to expand Tirana International airport and/or connect Tirana and southern Albania by a high-speed railway, instead of building Vlorë International airport.



Maps of alternative locations for Vlorë Airport

Figure 4 : Alternative locations proposed for the Vlorë Airport - © Elisa Tuillon based on Non-technical summary of in-depth report of EIA Vlorë International Airport (F. Vladi & S. Sulçe, 2021)

ANNEXE F : Reduced list of bird species (contacted on the site between 2016 and 2020) with their conservation status

*Please, note that the conservation status of this list may have evolved.

Legend of the column:

- 1 - Bern Convention Appendixes II-III
- 2 - Emerald Network Appendixes
- 3 - RAMSAR
- 4 - IUCN Red List Europe
- 5 - IUCN Red List Europe 27
- 6 - IUCN Red List Global
- 7 - IUCN Red List Albania
- 8 - Annex I-II EU Birds Directive
- 9 - CMS Appendixes
- 10 - AEWA
- 11 - Cites Appendixes

<i>Scientific name</i>	<i>Albanian name</i>	<i>English name</i>	1	2	3	4	5	6	7	8	9	10	11
<i>Accipiter nisus</i>	Gjeraqina e shkurtës	Eurasian Sparrowhawk	III			LC	LC	LC	EN	I*	II		II
<i>Actitis hypoleucos</i>	Kllinza e vogël	Common Sandpiper	II		X	LC	NT	LC			II	X	
<i>Anthus pratensis</i>	Drenja e livadhit	Meadow Pipit	II			NT	VU	NT					
<i>Ardea alba</i>	Çafka e bardhë e madhe	Great White Egret	II	I	X	LC	LC	LC	EN	I	II*	X	
<i>Ardea cinerea</i>	Çafka e përhimë	Grey Heron	III		X	LC	LC	LC	VU			X	
<i>Ardea purpurea</i>	Çafka e kuqërreme	Purple Heron	II	I	X	LC	LC	LC	EN	I	II*	X	
<i>Ardeola ralloides</i>	Çafka e verdhë	Squacco Heron	II	I	X	LC	LC	LC	EN	I		X	
<i>Arenaria interpres</i>	Gjelëza laramane	Ruddy Turnstone	II		X	LC	EN	LC			II	X	
<i>Bubulcus ibis</i>	Çafka e gjedhit	Cattle Egret	II		X	LC	LC	LC				X	
<i>Burhinus oedicnemus</i>	Gjelaci symadh	Eurasian Thick-knee	II	I	X	LC	LC	LC	CR	I	II		

<i>Buteo buteo</i>	Huta	Eurasian Buzzard	III			LC	LC	LC	VU		II		II
<i>Calidris canutus</i>	Gjelëza e madhe	Red Knot	III		X	LC	LC	NT		II/B	II	X	
<i>Calidris ferruginea</i>	Gjelëza gushëkuqe	Curlew Sandpiper	II		X	VU	VU	NT			II	X	
<i>Calidris pugnax</i>	Luftëtari	Ruff	III	I	X	LC	EN	LC		III/B	II	X	
<i>Calonectris diomedea</i>	Lajmëtari i madh i furtunës	Scopoli's Shearwater	II	I	X	LC	LC	LC	EN	I			
<i>Caprimulgus europaeus</i>	Dallëndyshja e natës	European Nightjar	II	I		LC	LC	LC	LR	I			
<i>Circaetus gallicus</i>	Shqiponja gjarpërngrenëse	Short-toed Snake-eagle	III	I		LC	LC	LC	VU	I	II		II
<i>Circus cyaneus</i>	Shqipja e fushës	Hen Harrier	III	I		NT	LC	LC		I	II		II
<i>Circus macrourus</i>	Shqipja e hirtë	Pallid Harrier	III	I		NT	EN ^o	NT		I	II		II
<i>Circus pygargus</i>	Shqipja e baltakëve	Montagu's Harrier	III	I		LC	LC	LC	EN	I	II		II
<i>Egretta garzetta</i>	Çafka e bardhë e vogël	Little Egret	II	I	X	LC	LC	LC	VU	I		X	
<i>Falco naumanni</i>	Skifteri kthetraverdhë	Lesser Kestrel	II	I		LC	LC	LC	VU	I	I/I		II
<i>Falco subbuteo</i>	Skifteri i drurëve	Eurasian Hobby	II			LC	LC	LC	VU		II		II
<i>Falco tinnunculus</i>	Skifteri kthetrazi	Common Kestrel	II			LC	LC	LC	VU		II		II
<i>Fulica atra</i>	Bajza	Common Coot	III		X	NT	LC	LC		II/A; III/B	II*	X	
<i>Haematopus ostralegus</i>	Laraska e detit	Eurasian Oystercatcher	III		X	VU	VU	NT		II/B		X	
<i>Himantopus himantopus</i>	Kalorësi	Black-winged Stilt	II	I	X	LC	LC	LC	EN	I	II	X	

<i>Hydrocoloeus minutus</i>	Pulëbardha e vogël	Little Gull	II	I	X	NT	LC	LC			I		X
<i>Hydroprogne caspia</i>	Dallëndyshja e detit e madhe	Caspian Tern	II	I	X	LC	NT	LC			I	II*	X
<i>Larus michahellis</i>	Pulëbardha këmbëverdhë	Yellow-legged Gull	III		X	LC	LC	LC			II/B*		X
<i>Limosa lapponica</i>	Gjelëza e madhe bishtvijëzuar	Bar-tailed Godwit	III	I	X	LC	LC	NT			III/B	II	X
<i>Limosa limosa</i>	Gjelëza e madhe bisht zezë	Black-tailed Godwit	III		X	VU	EN	NT			II/B	II	X
<i>Mareca penelope</i>	Kryekuqja e madhe	Eurasian Wigeon	III		X	LC	VU	LC			II/A; III/B	II	X
<i>Melanocorypha calandra</i>	Drenja e madhe qafëzezë	Calandra Lark	II			LC	VU	LC			I		
<i>Merops apiaster</i>	Bregca	European Bee-eater	II			LC	LC	LC	EN			II	
<i>Numenius arquata</i>	Kojliku i madh	Eurasian Curlew	III		X	VU	VU	NT			II/B	II	X
<i>Nycticorax nycticorax</i>	Çafka e natës	Black-crowned Night-heron	II		X	LC	LC	LC	VU	I			X
<i>Pandion haliaetus</i>	Shqiponja peshkngrënëse	Osprey	III			LC	LC	LC	VU	I		II	II
<i>Pelecanus crispus</i>	Pelikani kaçurrel	Dalmatian Pelican	II		X	LC	LC	NT	CR	I		I/I	X
<i>Pernis apivorus</i>	Huta grenxangrënëse	European Honey-buzzard	III			LC	LC	LC	EN	I		II	II
<i>Platalea leucorodia</i>	Çafka sqeplugë	Eurasian Spoonbill	II		X	LC	LC	LC	EN	I		II	X
<i>Plegadis falcinellus</i>	Kojliku i zi	Glossy Ibis	II		X	LC	LC	LC	EN	I		II	X
<i>Recurvirostra avosetta</i>	Sqepbiza	Pied Avocet	II		X	LC	LC	LC	EN	I		II	X

<i>Sterna hirundo</i>	Dallëndyshja e detit zakonshme	Common Tern	II		X	LC	LC	LC	EN	I	II *	X	
<i>Streptopelia turtur</i>	Turtulli	European Turtle-dove	III			VU	NT	VU		II/B	II *		
<i>Tringa stagnatilis</i>	Qyrylyku sqepollë	Marsh Sandpiper	II		X	LC	EN	LC			II	X	
<i>Tringa totanus</i>	Qyrylyku këmbëqirizë	Common Redshank	III		X	LC	VU	LC		II/B	II	X	
<i>Tyto alba</i>	Kukuvajka mjekroshe	Common Barn-owl	II			LC	LC	LC	VU				II
<i>Upupa epops</i>	Pupëza	Eurasian Hoopoe	II			LC	LC	LC	VU				