

Mr. Rafael Schwartzman
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28046 Madrid, Spain

CC:

Mr. Manuel Lanuza, Manager Airport Development at IATA

Mr. Mikaël Poutiers, Bern Convention General Secretary

Ms. Musonda Mumba, Ramsar Secretary General

Ms. Ursula von der Leyen, President of the European Commission

Mr. Thomas Waitz, Member of the European Parliament

Ms. Isabel Santos, Member of the European Parliament

Object : International agreements compromised by airport plans in Albania

Dear Mr. Schwartzman,

As the Regional Vice President of IATA in Europe, we would like to bring your attention to the consequences on the construction of an international airport in the area of the Narta Lagoon in Albania. The construction of the Vlora Airport poses a direct threat to human security, severely impacts one of the most important areas for biodiversity in Albania and violates international agreements. On behalf of the 33 organizations who are signing this letter, we invite you to reconsider your support for this project.

Despite a clear lack of compliance with legal and transparency standards, works to build the airport started last year without the compulsory construction permit and inside the Vjosa-Narta Protected Landscape. Vjosa-Narta is a legally protected area, situated at a key spot on the Adriatic flyway. As such, it constitutes a major breeding site for migratory birds, including many protected birds listed on Annex I of the European Birds Directive¹, but also a diversity of other remarkable species such as Loggerhead turtle (*Caretta caretta*) or Monk seal (*Monachus monachus*)- (cf. Annex A and F).

Environmental experts, including the Swiss Ornithological Centre, have expressed concerns over the risk of frequent bird strikes. *“The construction and the operation of the airport will not only threaten numerous birds but is also likely to have safety issues for passengers (...) the construction of an airport within such a bird rich area will create a severe risk of collisions of airplanes with birds. A collision with one of the biggest birds in the world, the Dalmatian Pelican (Pelecanus crispus), which is breeding in the surroundings of the planned airport, is likely to end in a catastrophe”*². (cf. Annex C)

¹ Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds“, European Parliament and European Council, Official Journal L 20 of 26.01.2010.

² Werner S. 2023. Construction of the Vlora International Airport in the Vjosa-Narta Protected Area (letter)

The Secretariat of the Bern Convention on the Conservation of European Wildlife and Natural Habitats, hosted by the Council of Europe, has urged the Albanian government to suspend the construction of Vlora International Airport until a new and sufficient Environmental Impact Assessment (EIA) procedure, as well as a Proper/Appropriate Assessment (as required by EIA law) are conducted.

In the context of Albania's EU accession, the European Commission has been critical of the way in which the Environmental Impact Assessment (EIA) was carried out for the Vlora airport project, and also has clearly stated that "*construction works for the new Vlora Airport (...) are in contradiction with national laws and international biodiversity protection conventions that have already been ratified*"³.

Likewise, the European Parliament has expressed its opposition to the project by "*urging the Albanian government to halt projects that risk violating national and international biodiversity protection standards, such as the Vlorë international airport*"⁴.

As a result, the construction project fails to comply with international conventions and ignores European recommendations.

Regarding user safety and air traffic efficiency, this geographical location also entails considerable risks. Vlora Airport is planned to be built in a flood zone. With sea level rise, modeling shows that it is certain that the airport will be subject to flooding. Technical advances will not be sufficient to ensure neither the safety of passengers nor the proper functioning of airlines on the site in the long term. (Cf. Annex B)

Last but not least, preserving and restoring coastal wetlands like the Narta Lagoon is key for sequestering the carbon emissions of the aviation industry and achieving net zero carbon by 2050. For all of these reasons, the Vlora Airport contradicts the principle of "*Nature-based planning approaches that maintain biodiversity without impacting safety*", mentioned in your paper "Airport Environmental Sustainability" (November 2022)⁵.

As a group of 33 international environmental organizations, from 26 countries, including members of the Mediterranean Alliance for Wetlands and BirdLife International partners, we firmly believe in finding a solution that reconciles socioeconomic well-being with environmental preservation. In the specific case of the Vjosa-Narta Protected landscape, we endorse the following alternatives supported by the environmental experts Albanian Ornithological Society (AOS) and Protection and Preservation of Natural Environment in Albania (PPNEA):

- **Enlarging Tirana International Airport and/or connecting Tirana and southern Albania with a high speed railway**, instead of constructing Vlora International airport
- **Identifying alternative locations** (Risili, Kafaraj, Levan) based on a proper assessment of the environmental and safety risks (cf. Annex E)

With this letter, we are asking you to actively engage in negotiations with aviation operators in support of the recommendations of the European Union and the Bern Convention and of the proposed alternatives.

We consider that your organization has a unique opportunity to publicly demonstrate your leadership in addressing the environmental crisis and promoting sustainability in aviation.

³ European Commission, Albania 2022 Report (SWD(2022) 332), 12 October 2022. Available at https://neighbourhood-enlargement.ec.europa.eu/albania-report-2022_en

⁴ 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

⁵ [IATA. Airport Environmental Sustainability – Nov 2022](#)

We remain at your disposal to provide any further information required and to contribute our expertise to support the protection and preservation of the Vjosa-Narta Protected Landscape.

Signatures



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&emwelt (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)

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 caprisucus</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

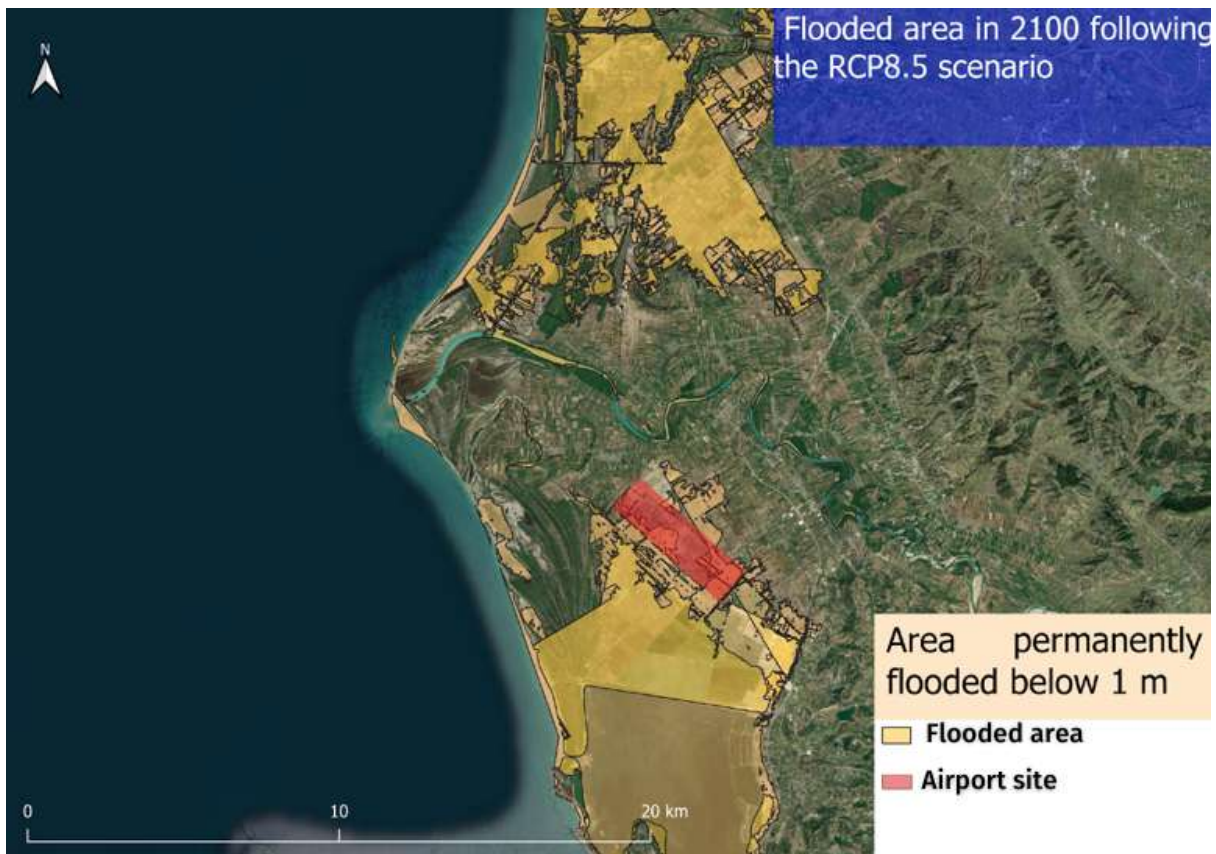


Figure 1 : Submersion map +1m in 2100, RCP8.5 scenario © Emanuele Ingrassia - A coastal morpho-dynamic evolution in south of Albania from the project GREEN and BLUE CoAL-ITion (NATURALBANIA) - 2023

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

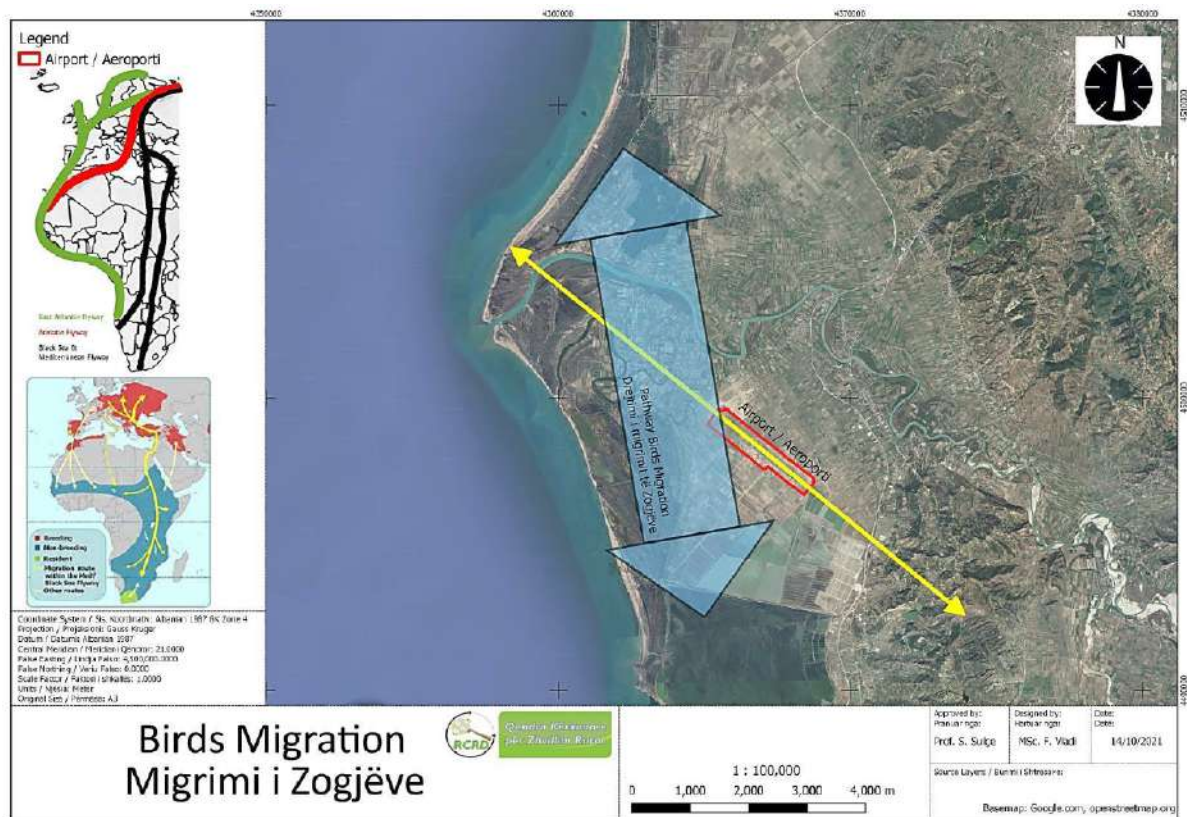


Figure 2 : Flow movement of the birds during the migration period. © F. Vladi & S. Sulçe, 2021 – from Non-technical summary of in-depth report of EIA Vlora International Airport -

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

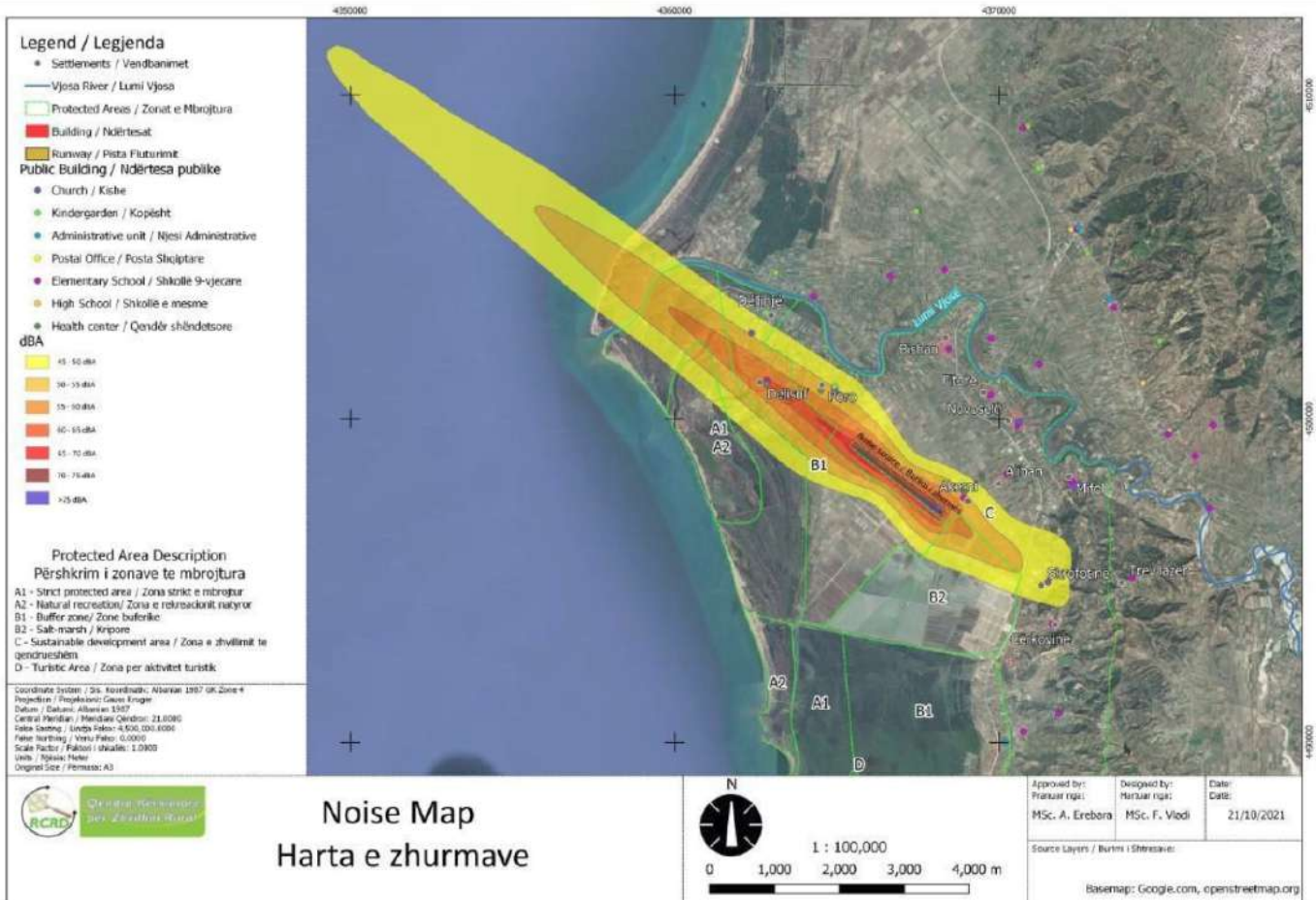


Figure 3 : Noise Map of the Vlora Airport © F. Vladi & S. Sulçe, 2021 – from Non-technical summary of in-depth report of EIA Vlora International Airport

Annex E : Alternative locations proposed

Legend

- Vjosa Narta Protected Landscape
- Current location of Vlora 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 Vlora International airport.



Maps of alternative locations for Vlora Airport

Figure 4 : Alternative locations proposed for the Vlora Airport - © Elisa Tuillon based on Non-technical summary of in-depth report of EIA Vlora 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

Scientific name	Albanian name	English name	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 përhime	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 oedicephalus</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	N T				II	X	
<i>Calidris pugnax</i>	Luftëtari	Ruff	III	I	X	LC	EN	LC		III/ B		II	X	
<i>Calonectris diomedeae</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>Circus 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	N T		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 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	N T		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	N T		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
<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	II
<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 e 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 sqepbollë	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				