

Mr. Edi Rama, Prime Minister of Republic of Albania
Kryeministria
Bulevardi Dëshmorët e Kombit 7 1010, Tiranë,
Albanie

CC:

Ms. Mirela Kumbaro, Minister of Tourism &
Environment of Albania

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

Ms. Luigi Soreca, EU Ambassador to Albania

Ms. Isabel Santos, Member of the European
Parliament and rapporteur on the 2022
Commission Report on Albania

Mr. Mikaël Poutiers, Bern Convention General
Secretary

Object : Suspending the construction of Vlora International Airport in accordance with the decision of the Bern Convention

Dear Prime Minister Edi Rama,

On behalf of the 33 signatory organisations representing 26 countries of this letter, and following the last recommendation of the Bern Convention on the Conservation of European Wildlife and Natural Habitats, we strongly invite you to reconsider current plans to build an international airport in Vjosë-Nartë in favour of other viable alternatives which allow the preservation of one of Albania's richest areas for biodiversity.

Scientists and conservation specialists, non-governmental organisations and international institutions have expressed a unanimous view on the irreversible impacts of building the airport in this area.

We firmly believe that there are alternative solutions to the construction of the airport in the Narta Lagoon, which make it possible to reconcile socioeconomic well-being with environmental preservation. With this letter, we are asking you to seriously consider the following alternatives supported by the environmental experts of the 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 the Vlora International airport
- **Identifying alternative locations (Risili, Kafaraj, Levan)** based on a proper assessment of the environmental and safety risks. (cf. Annex E)

Vjosë-Nartë is one of the most important wetlands along the Adriatic flyway and one of the two main wetlands in Albania. Constructing an international airport in the Narta Lagoon - or expanding the old military base - will force a high number of species to leave their natural habitats, including over 200 bird species and 70 potentially endangered species included on the IUCN Red List while impacting other protected species such as the Monk Seal (*Monachus monachus*). (Cf. Annex A and F)

The exceptional yet vulnerable biodiversity in the Vjosë-Nartë Protected Landscape is recognised both on a national and international scale, as reflected in its distinguished designations: Emerald Site Candidate, an Important Plant Area, an Important Bird Area, a Key Biodiversity Area, and a potential Natura 2000 site.

Considering the proposed alternatives in this letter would allow the Republic of Albania to comply with the latest recommendations of the Bern Convention as well as those of the European Union. The recent recommendation n°219 (2023) adopted on the 5th of September 2023 by the Standing Committee of Bern Convention stipulates that : “ *plans to construct an airport in the Vjosë-Nartë Protected Landscape should be suspended until a valid Environmental Impact Assessment (EIA) and a Proper/Appropriate Assessment are conducted, as required by the EIA law*”¹

The recommendation of the Bern Convention is entirely in line with the position of the European institutions. The European Commission has 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*”². Furthermore, the European Parliament has urged Albania “*to halt projects that risk violating national and international biodiversity protection standards, such as the Vlorë international airport*”³.

In the context of the negotiations for accession to the European Union, Albania must embrace the values that the EU stands for by adapting progressively its national laws to align with EU rules, including the environmental acquis laid out in Chapter 27.

By adopting one of the proposed alternatives to the construction of the Vlora Airport, Albania could demonstrate to the world its leadership in addressing the biodiversity crisis and promoting socio-economic development that complies with international and national laws and commitments.

¹ Bern Convention, [Recommendation 219 \(2023\)](#) on the possible impacts of infrastructure and urbanisation developments particularly Vlora International Airport, on the Vjosa-Narta Protected Area

² European Commission, Albania 2022 Report (SWD(2022) 332), 12 October 2022. Available at https://neighbourhood-enlargement.ec.europa.eu/albania-report-2022_en

³ 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

We remain at your disposal to provide any further information you may require and to contribute, with our expertise, to support the protection of the Vjosë-Nartë Protected Landscape. Sincerely,
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)

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

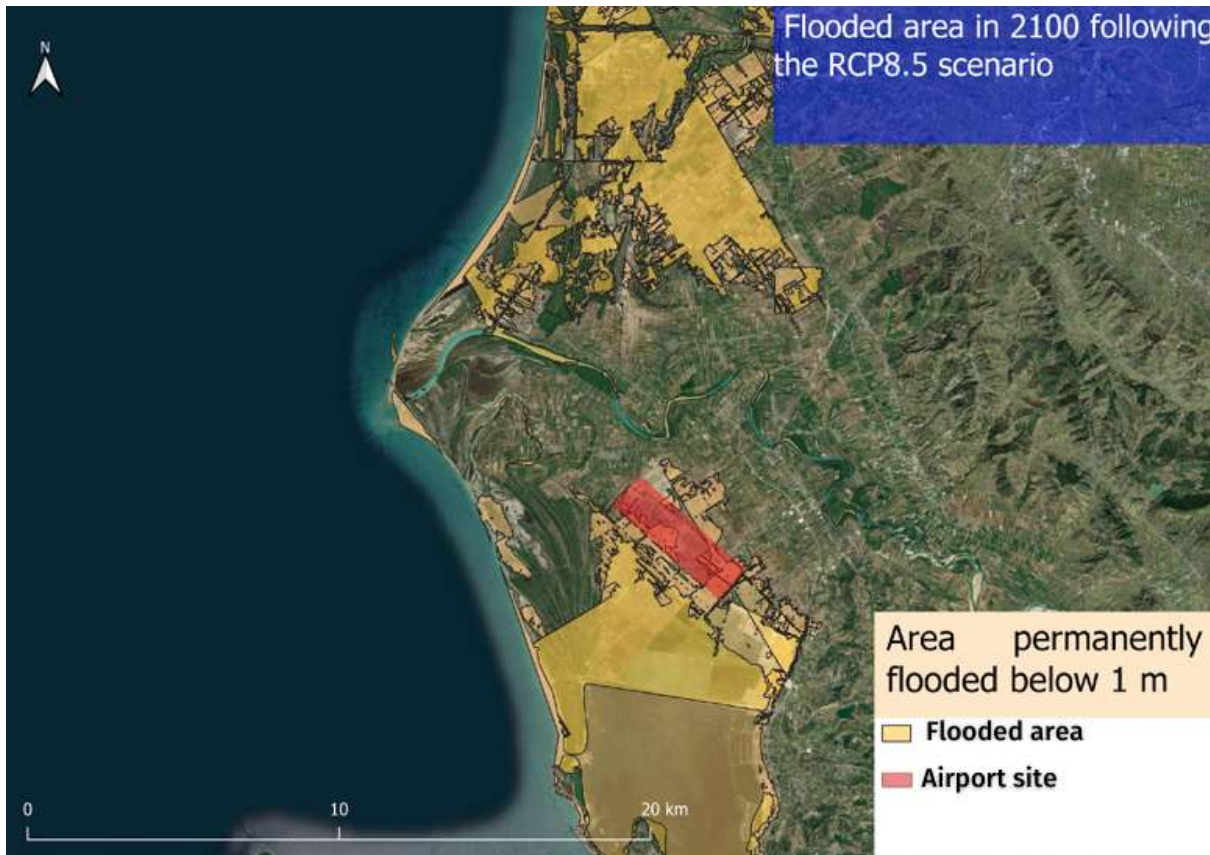


Figure 1 : Submersion map +1m in 2100, RCP8.5 scenario © Emanuele Ingrassia - A coastal morpho-dynamic evolution in south of Albania from the project GREEN and BLUE CoAL-ITion (NATURALBANIA) - 2023

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

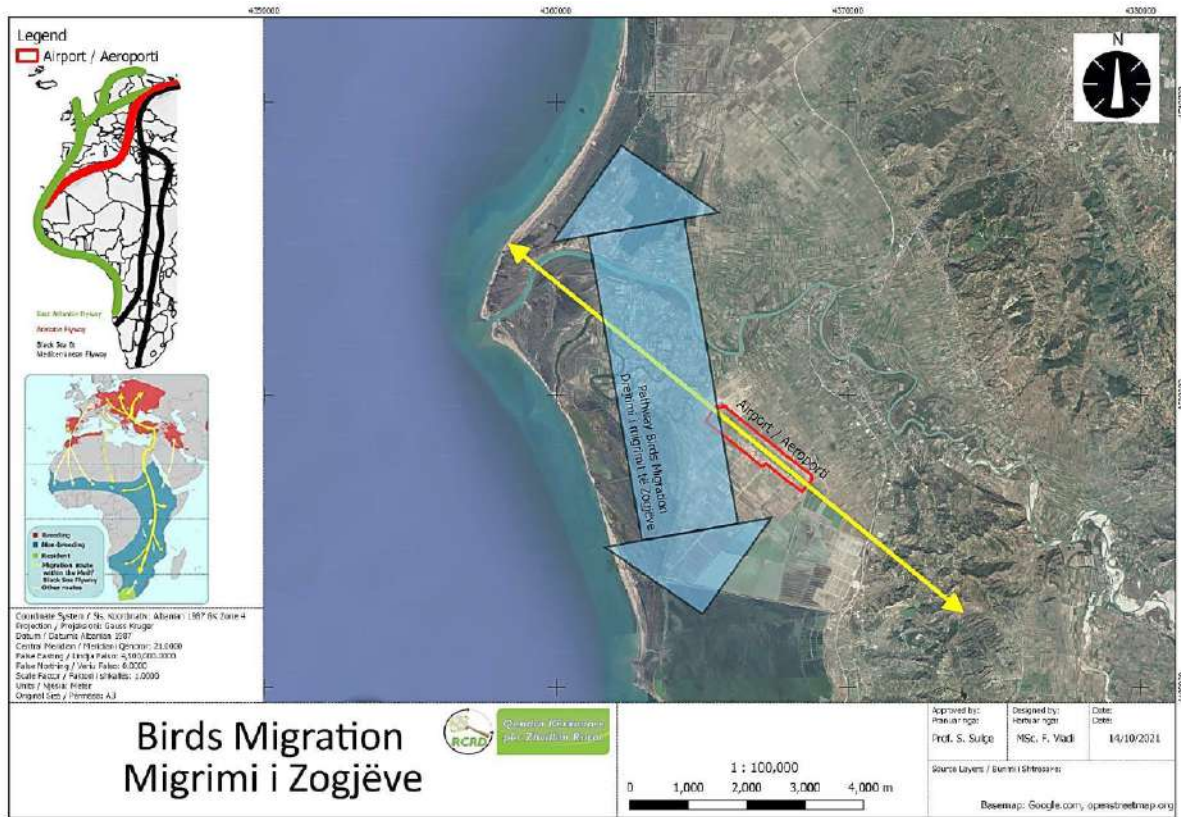


Figure 2 : Flow movement of the birds during the migration period. © F. Vladi & S. Sulçe, 2021 – from Non-technical summary of in-depth report of EIA Vlora International Airport -

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

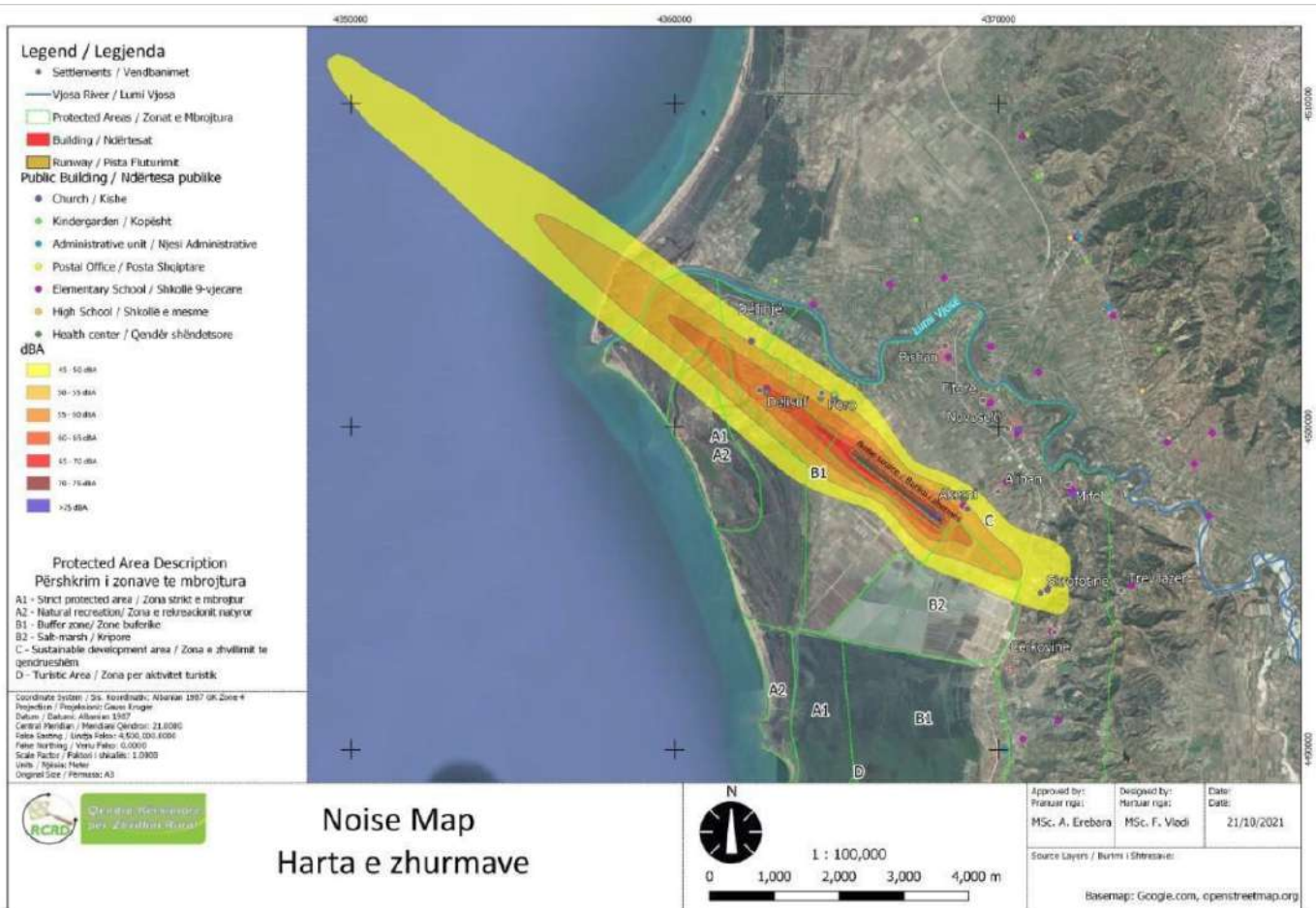


Figure 3 : Noise Map of the Vlora Airport © F. Vlodi & S. Sulçe, 2021 – from Non-technical summary of in-depth report of EIA Vlora International Airport

Annex E : Alternative locations proposed

Legend

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

**All these alternatives 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 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
<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 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				