

Date 9 June 2026

**To: The Assembly of the Republic of Albania**

**Cc:** H. E. Mrs. Monika Zach, Ambassador, Embassy of Austria  
H. E. Mr. Albin Otruba, Ambassador, Embassy of the Slovak Republic  
H. E. Mr. Christian Grønbech-Jensen, Ambassador, Embassy & Permanent Mission of Denmark in Austria  
H. E. Mr. Frédéric Meurice, Ambassador, Embassy of the Kingdom of Belgium  
H. E. Mr. Gabriel Cremades Ventura, Ambassador, Embassy of the Kingdom of Spain  
H. E. Mr. Ivaylo Kirov, Ambassador, Embassy of the Republic of Bulgaria  
H. E. Mr. Karl Bergner, Ambassador, Embassy of the Federal Republic of Germany  
H. E. Mr. Marc Hübsch, Ambassador, Embassy of the Grand Duchy of Luxembourg  
H. E. Mr. Marco Alberti, Ambassador, Embassy of the Republic of Italy  
H. E. Mr. Niklas Ström, Ambassador, Embassy of Sweden  
H. E. Mr. Octavian Șerban, Ambassador, Embassy of România  
H. E. Mr. Pavel Vacek, Ambassador, Embassy of the Czech Republic  
H. E. Mr. Reinout Caspar Vos, Ambassador, Embassy of the Kingdom of the Netherlands  
H. E. Mr. Zlatko Kramarić, Ambassador, Embassy of the Republic of Croatia  
H. E. Mrs. Catherine Suard, Ambassador, Embassy of France  
H. E. Mrs. Karin Rannu, Ambassador, Embassy of Estonia  
H. E. Mrs. Lambrini Komini, Ambassador, Embassy of the Hellenic Republic in Tirana  
H. E. Mrs. Ruth Huber, Ambassador, Embassy of Switzerland  
H. E. Ms. Kato Kikuko, Ambassador, Embassy of Japan  
H. E. Ms. Lina Skerstonaitė, Ambassador, Embassy of the Republic of Lithuania  
Mr. Bardhyl Minxhozi, Honorary Consulate of Finland, Tirana  
Mr. Dorian Sadiku, Honorary Consul, Embassy of Portugal  
Mr. Jakob Štunf, Embassy of the Republic of Slovenia  
Mr. Sokol Kraja, Honorary Consul, Embassy of the Republic of Latvia  
Mr. Tom Preku, Honorary Consul, Embassy of Malta, Honorary Consulate  
Mr. Vladimir Avrami, Honorary Consul, Embassy of the Republic of Cyprus  
Mr. Wojciech Unolt, Embassy of the Republic of Poland  
Ms. Ciara O'Floinn, Embassy of Ireland  
Ms. Martina Kasnyik, Embassy of Hungary  
Ms. Nancy VanHorn, Deputy Chief of Mission and Chargé d'Affaires, U.S. Embassy Tirana  
  
H. E. Mr. Michel Tarran, Ambassador, Head of the OSCE Presence in Albania  
H. E. Mr. Silvio Gonzato, Ambassador, Delegation of the European Union to Albania  
Mr. Gjergj Murra, Executive Director, Western Balkans Fund, Secretariat in Tirana  
Mr. Boris Erg, Director, IUCN European Regional Office

Mr. Massimiliano Paolucci, Country Manager for Albania, World Bank Group  
Mr. Michele Ribotta, UN Women Representative in Albania  
Mr. Murat Şahin, UNICEF Representative, UNICEF Albania  
Ms. Ekaterina Solovova, Head of Office, European Bank for Reconstruction and Development (EBRD) Albania  
Ms. Giulia RE, Head of Office, Council of Europe Office in Tirana  
Ms. Ingrid Macdonald, UN Resident Coordinator in Albania, United Nations in Albania  
Ms. Randi Davis, Resident Representative, United Nations Development Programme (UNDP) Albania

**Subject: REQUEST FOR THE REVIEW OF GOVERNMENT POLICIES ON PROTECTED AREAS IN ALBANIA**

Through this letter, we publicly address to You the request for the review of the Albanian Government's policies on Protected Areas.

This request follows the joint position presented by civil society organizations in 2024 regarding the amendments to Law No. 81/2017 "On Protected Areas". Despite the objections and comments submitted by civil society, in February 2024 the Assembly approved the amended law<sup>1</sup>.

Regrettably, we note that, as we had warned, the amendments introduced to the Law on Protected Areas are paving the way not only for their degradation, but also for a lack of transparency in decision-making, the bypassing of environmental decision-making structures, and violence against citizens. The case of the investment in the "core zone" of the Protected Landscape "Pishë Poro – Nartë"<sup>2</sup> is the most recent case.

In this context, our position is presented as a broader analysis of environmental decision-making, Albania's obligations in the European integration process, and the long-term consequences of allowing new tourism developments in protected areas.

## **1) ALBANIAN NATURE AND EUROPEAN UNION INTEGRATION TODAY**

### **The amended law destroys nature and hinders the European Union integration process**

The position of the European Union, published in the accession document<sup>3</sup> for Cluster 4, "Green Agenda and Sustainable Connectivity", requires Albania to: 1) repeal the incompatible provisions adopted through the amendments to the Law on Protected Areas (Law No. 21/2024); and 2) repeal the 2015 Law on Strategic Investments. *This transforms the review of the Law on Protected Areas from a request of civil society into a condition for the European integration process!*

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<sup>1</sup> Ligji 21/2024 "Për disa shtesa dhe ndryshime në ligjin nr. 81/2017 'Për zonat e mbrojtura'".

<sup>2</sup> VKM nr. 694, datë 26.10.2022

<sup>3</sup> Këshilli i Bashkimit Europian: "Qëndrimi i Përbashkët i Bashkimit Europian: Grupkapitulli 4 – Axhenda e Gjellbër dhe Ndërlidhshmëria e Qëndrueshme, Konferenca për Anëtarësimin në Bashkimin Europian – Shqipëri, AD 15/25, CONF-ALB 12/25". Bruksel, 12 shtator 2025. <https://data.consilium.europa.eu/doc/document/AD-15-2025-INIT/en/pdf>

Despite this, the General Analytical Programme of Draft Acts for 2026<sup>4</sup> *does not list* the review of the Law on Protected Areas. *This raises serious concern that the contested law may continue to produce concrete and irreversible consequences in protected areas.*

As early as 2006, with the approval of the Stabilization and Association Agreement between the Republic of Albania and the European Communities and their Member States, it was agreed that *“the Parties shall develop and strengthen their cooperation in the vital task of combating environmental degradation, with a view to promoting environmental sustainability.”*<sup>5</sup> Twenty years later, the latest developments in protected areas show that the country has regressed in environmental governance.

## 2) THE FUTURE

### **Investments in protected areas create a costly conflict for the country’s future**

Albania has understood that membership in the European Union is not merely a political objective. It is accompanied by clear legal, institutional, social and economic standards, conditions and obligations. For a Member State, responsibility towards the *EU acquis* is significantly higher and is accompanied by penalties in cases of non-compliance or failure to implement directives. *This will also be Albania’s responsibility within the objective of becoming a Member State by 2030.*

Protected areas are defined by law as national assets<sup>6</sup>. Currently, **all of them** have been proposed as “Sites of Community Interest” and, after accession, will be directly linked to the Natura 2000 network<sup>7</sup>. The “Vjosë – Nartë – Pishë Poro” area has been proposed as an entire and complex area to become one of Albania’s future Natura 2000 sites. The proposal was put forward by the scientific community within the framework of the NaturAL<sup>8</sup> project, and additional work on parts of this area will be completed under the EU4Nature project.

According to the principles of environmental right<sup>9</sup>, *the destruction of nature is either irreversible or reversible only at a very high cost.* Allowing ex novo investments<sup>10</sup> in protected areas automatically transfers these investments into future Natura 2000 sites. But, if Albania is to be a Member State of the European Union by 2030, this implies that Albania will have repealed the incompatible provisions of Law No. 21/2024 on protected areas and transposed a new law in line with IUCN principles, **while the protected areas on the ground may no longer meet conservation criteria.** Under these circumstances, *how will investments in elite tourism already developed within protected areas under the current contested law be addressed?*

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<sup>4</sup> Vendim Nr. 812, datë 30.12.2025 “Për miratimin e programit të përgjithshëm analitik të projektakteve, që do të paraqiten për shqyrtim në Këshillin e Ministrave gjatë vitit 2026”, fq.25-32

<sup>5</sup> Neni 108 – Mjedisi : «Palët do të zhvillojnë dhe forcojnë bashkëpunimin në detyrën shumë të rëndësishme të luftës kundër degradimit mjedisor, me synim promovimin e qëndrueshmërisë mjedisore. Bashkëpunimi përqendrohet kryesisht në fushat prioritare që lidhen me *acquis* e Komunitetit për fushën e mjedisit», ratifikuar me ligjin nr. 9590, datë 27.7.2006

<sup>6</sup> Ligji nr. 81/2017 “Për zonat e mbrojtura”, i ndryshuar

<sup>7</sup> Ligji i zonave të mbrojtura, Neni 28 - Zonat e veçanta të ruajtjes së rrjetit ekologjik të zonave me interes për komunitetin evropian

<sup>8</sup> [https://www.eeas.europa.eu/delegations/albania/strengthening-national-capacity-nature-protection-%E2%80%93-preparation-natura-2000-network\\_en](https://www.eeas.europa.eu/delegations/albania/strengthening-national-capacity-nature-protection-%E2%80%93-preparation-natura-2000-network_en)

<sup>9</sup> Parimet në ligjin kuader nr. 10 431, date 9.6.2011, “Per mbrojtjen e mjedisit”, i ndryshuar

<sup>10</sup> Parimet në ligjin kuader nr. 10 431, date 9.6.2011, “Per mbrojtjen e mjedisit”, i ndryshuar

For the future of a Member State, this situation may lead to two serious consequences:

1. The removal of the “Protected Area” status for all areas where investments have taken place and where ecological integrity and natural values have been lost;
2. The Albanian state risks to latter face the obligation to correct, restrict or review decisions taken today, including restoring the areas into compliance with the required standards. This would be a process with high political, natural, social and, above all, economic costs.

In this regard, a clear institutional response is required: *What is the Albanian Government’s scenario for resolving the conflict between new tourism developments in protected areas and the obligations Albania will have as a future Member State? And what is the scenario for addressing the related costs?*

### **3) PUBLIC PARTICIPATION, ACCOUNTABILITY AND TRANSPARENCY**

#### **Protected areas cannot be altered in “institutional silence” and without public accountability**

In the specific case of the proposed investment in the protected area “Pishë Poro – Nartë”, *the public is not uninformed*, while works started even without an information board on site. Citizens’ concerns *have been addressed only politically*, through statements emphasizing that there is no project, while there has been no institutional communication or transparency from the mandated structures. Meanwhile, there is a permit issued by the National Council of Territory and Water, and circulates an environmental impact assessment document dated April 2026 is circulating.

*Informing and involving citizens in environmental decision-making is not a matter of political will, but a legal obligation.* The responsible state structures have the duty to ensure transparency, effective public consultation and technical explanation from the early stages of any plan, programme or project affecting natural areas and, in particular, protected areas.

The Aarhus Convention, the main instrument of environmental democracy, guarantees the public’s right to information, participation in decision-making and access to justice in environmental matters. These obligations are also reflected in Albanian legislation and in the horizontal package of the EU environmental acquis.

Taken together, these requirements ensure that environmental decision-making is not dominated by unilateral decisions of a single institution, but is instead coordinated, institutionally informed, consulted and transparent. *This is even more important when protected areas are concerned.*

### *Investment in the Protected Landscape “Pishë Poro – Nartë”*

Despite the amendments approved to the Law on Protected Areas, this legal framework itself provides that activities in protected areas may be carried out only after the relevant environmental permits or approvals have been obtained and, where required, the approval of the body responsible for the protection of the area has been granted. In the case of the Protected Landscape “Pishë Poro – Nartë”, the ecological importance of the area, its inclusion in the list of wetlands of international importance, and its values for wild and migratory birds require a full, careful and transparent assessment of any proposed intervention. Moreover, the law provides that private properties included within protected areas are administered and used only in accordance with the approved management plan and zoning. In circumstances where “Pishë Poro – Nartë” does not yet have a management plan in force, but such a plan is currently being prepared under EU4Nature, there is an obligation to provide public clarification on the legal, procedural and environmental basis on which any decision-making for new developments in this area has relied.

In light of the above, and in the absence of the legal documents required for activities permitted in protected areas, on what basis does the National Council of Territory and Water decide that a protected area may be turned into an area for elite tourism<sup>11</sup> development?

The full, step-by-step publication of the documentation on which decision-making in the “Pishë Poro – Nartë” case has been based is an obligation. *Institutional silence and lack of transparency cannot be the way protected areas are treated.*

#### **In this context, we request the following:**

1. The immediate repeal of the provisions introduced by Law No. 21/2024 amending the Law “On Protected Areas”;
2. The immediate launch of a transparent, inclusive and expert-based process for the review of Law No. 81/2017 “On Protected Areas”, with the aim of fully aligning it with the European Directives;

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<sup>11</sup> Term “pa përkufizim ligjor poi përdorur në Strategjinë e Turizmit 2025–2030

3. The establishment of a ban of permits for new tourism and infrastructure developments in protected areas, until the legal framework is fully aligned with the EU acquis, IUCN principles, biodiversity conservation obligations and public participation requirements.

We close our communication by quoting Article 64 of the Law on Protected Areas, "The obligation of the public to preserve protected areas": *"Everyone has the obligation to respect the rules and restrictions established by the administration responsible for the protection of the area, which are in accordance with this law, the legal framework on agriculture, territorial planning, tourism, cultural heritage, local governance and scientific research institutes, and to protect these areas."*

**We support all Albanian citizens who fulfil their legal obligations.**

Contact:

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With trust,

**Civil society organizations in alphabetic order:**

1. Act for Society, Tiranë
2. Akademia e Integritit Europian dhe Negociatave (AIEN), Tiranë
3. AKSION Plus, Tiranë
4. All Green Center, Tiranë
5. Apathy H.A.N.A - Lezhë
6. Ardhmëria Euro Atlantike, Pogradec
7. CELIM Shqipëri
8. CELS Albania -Qendra e Shërbimeve Ligjore Evropiane, Tiranë
9. Child Rights Centre Albania (CRCA), Tiranë
10. CLE - Centre for Legal Empowerment, Tiranë
11. COSV Albania
12. Dhoma Ekonomike e Gruas (WECA), Tiranë
13. Drejtësi Sociale, Tiranë
14. EcoDesign and Management Institute (EDMI), Tiranë
15. ECO-Partners for Sustainable Development, Tiranë
16. Edu Media, Shkodër
17. Education For Change Centre, Tiranë
18. EKO Mendje, Tiranë
19. Engim, Fier
20. Epoka e Re, Fier
21. EuroPartners Development, Tiranë
22. Fondacioni Down Syndrome Albania, Tiranë

23. Fondacioni Shqiptar për të Drejtat e Personave me Aftësi të Kufizuara, Tiranë
24. Forumi i Mendimit të Lirë, Tiranë
25. Forumi Shqiptar i Liqenit të Shkodrës, Shkodër
26. Green Vizion, Vlorë
27. Grupi i Aktivisteve Rurale të Dibrës-GARD, Dibër
28. Hand to Hand Against Nation
29. Horizont EU, Lushnje
30. IDIA, Tiranë
31. ILIRIA, Tiranë
32. Impakt Inkubator, Tiranë
33. Institute for Nature Conservation in Albania (INCA), Tiranë
34. Institute of Romani Culture in Albania (IRCA), Tiranë
35. Instituti i Politikave të Qendrueshme, Tiranë
36. Instituti për Kontratën Shoqërore, Tiranë
37. Instituti Shqiptar për Studime Ligjore dhe Territoriale, Tiranë
38. Klubi Ekologjik, Elbasan
39. Kongresi Rinor Kombëtar, Tiranë
40. LUMI – Lëvizja për Ujërat Mjedisin dhe Integrimin, Tiranë
41. Mbro Traditën, Krijo të Ardhmen, Tiranë
42. NECI Albania
43. New Bridges, Berat
44. NGO ENVIO, Tiranë
45. Nisma për Ndryshim Shoqëror ARSIS, Tiranë
46. North Green Association, Tiranë
47. Opportunity Balance and Overcoming, Rrëshen
48. Organizata Rreze Shprese, Shkoder
49. Partnerët Shqipëri për Ndryshim dhe Zhvillim, Tiranë
50. Përtej Barrierave, Tiranë
51. Qendra Aleanca Gjinore për Zhvillim, Tiranë
52. Qendra Burimore e Mjedisit në Shqipëri (REC)
53. Qendra Durrësi Aktiv, Durrës
54. Qendra e Gruas "Hapa të Lehtë", Shkodër
55. Qendra e Informacionit Aarhus, Shkodër
56. Qendra e Nismave Qytetare për Mbrojtjen e Mjedisit, Tiranë
57. Qendra Kulturore Mediatike Antigonea, Gjirokaster
58. Qendra Mjedisore EDEN, Tiranë
59. Qendra Mjedisore për Mbrojtje, Edukim dhe Rehabilitim (Qendra EPER), Shkodër
60. Qendra Mjedisore për Studime dhe Zbatime, Librazhd
61. Qendra Network Albania, Diber
62. Qendra për Advokim Social, Tiranë
63. Qendra për Drejtësi Gjinore në Shqipëri
64. Qendra për Popullsinë dhe Zhvillimin (ACPD), Tiranë

65. Qendra per Zhvillim Ekonomik dhe Marrdhënie Ndërkombëtare, Tiranë
66. Qendra për Zhvillim Komunitar “Sot për të Ardhmen”, Tiranë
67. Qendra Rinore Trokitje, Shkodër
68. Qendra Shërbimi Ligjor Falas Tiranë
69. Qendra Shqiptare e Inteligjencës Artificiale (AI Albania), Tiranë
70. Qendra Shqiptare për Kërkime Ekonomike (ACER), Tiranë
71. Qendra Shqiptare per Zhvillimin e Familjes, Tiranë
72. Qendra Shqiptare YMCA
73. Reinforce Sustainability (RESU), Tiranë
74. Resurset në Zhvillim, Shkodër
75. Rrjeti Ballkanik për Gazetarinë Investigative Shqipëri (BIRN)
76. Rrjeti i Profesionistëve të Rinj, Tiranë
77. Sërish Horizont, Shkodër
78. SHERM Albania, Dibër
79. Shoqata "Unë, Gruaja" Pogradec
80. Shoqata “Qendra Sociale në Ndhimë të Njerëzve në Nevojë”, Fushë-Arrëz
81. Shoqata “SEBASTIA”, Kurbin
82. Shoqata Alpin, Bajram Curri
83. Shoqata Internazionale për Solidaritetin, Tiranë
84. Shoqata LDA Europe, Tiranë
85. Shoqata Multifunkionale për Kulturë, Edukim dhe Zhvillim, Gjirokastër
86. Shpresa për të ardhmen, Tiranë
87. Sindikata e Psikologëve dhe Punonjësve Social, Tiranë
88. Social Education for Environment Protection (SEEP), Vlorë
89. Trajnerë në Edukim, Shkodër
90. Udhetim i Lirë, Durrës
91. UNPLGD, Tiranë
92. Voice of Roma in Albania
93. Volontariato Internazionale per lo Sviluppo (VIS Albania), Tiranë
94. Well Point, Shkodër
95. Wild Albania Centre, Tiranë
96. Your Strong Voice, Vlorë