Response to the Prime Minister's Statement

A Political Statement Without Scientific or Legal Basis

Following the recent statements made by Prime Minister Rama regarding the proposed investments in Zvërnec, we consider it necessary to provide a clarifying response for the public, highlighting a number of key concerns.

The information presented by the Prime Minister demonstrates that the most important documents upon which any serious decision-making process should be based are still missing:

1. The architectural design and detailed project documentation have not yet been presented.
2. The Comprehensive Environmental Impact Assessment (EIA) has not yet been completed.
3. The impacts on habitats, biodiversity, and ecosystems have not yet been properly assessed. Nor is there a final evaluation confirming the project's compliance with European nature protection standards.

In other words, the scientific and technical information that should serve as the foundation for any conclusion regarding the project's acceptability is still unavailable.

This is precisely why, under European legislation and modern environmental planning practices, assessments are not carried out to justify decisions that have already been made. Rather, they are intended to help institutions determine whether a project should proceed, be modified, or not be authorized at all. If the outcome is treated as predetermined before the studies have been completed, the very purpose of the assessment process is called into question.

Moreover, given that this concerns a protected area containing sensitive habitats and species under special protection status, the mere existence of a Comprehensive Environmental Impact Assessment is not sufficient. Compliance with the European environmental acquis requires analyses to be grounded in scientific evidence, to consider genuine development alternatives, and to assess cumulative impacts alongside other existing or planned projects. Equally important is that such assessments be subject to independent scientific and professional review, ensuring that the process does not rely solely on expertise commissioned by the project developer itself.

Until this process has been completed in full, any claim that the project is entirely consistent with the public interest and with European standards remains premature.

The rule of law and European standards are not demonstrated by approving major projects. They are demonstrated by ensuring that even the largest projects are subject to the same rules, the same scrutiny, and the same standards of transparency.

In the Management of Protected Areas, the State Is Not a Spectator

The state is not a passive observer in a private transaction; it is the institution responsible for determining whether development may take place within a protected area and under what conditions. The claim that the proposed development in Zvërnec is merely the outcome of an agreement between private landowners and investors presents an incomplete picture of the legal and institutional reality. The area proposed for investment is not an ordinary private territory but forms part of the "Pishë Poro–Nartë" Protected Landscape, originally designated as a protected area by Council of Ministers Decision No. 680 of 22 October 2004.

From the moment a territory is designated as a protected area, private ownership may continue to exist, but the exercise of property rights becomes subject to restrictions and public-interest rules related to nature conservation. This is a universal principle of protected area management and does not constitute an infringement of property rights. Therefore, the fact that investors have acquired private land neither resolves nor bypasses the fundamental question: is this development compatible with the conservation objectives of the protected area?

Neither Law No. 81/2017 "On Protected Areas" nor its 2024 amendments stipulate, under any circumstances, that private properties located within protected areas are exempt from nature conservation requirements. On the contrary, while the law recognizes property rights, it reserves to the state both the authority and the obligation to determine which activities may be permitted and which must be prohibited within these territories.

The amendments introduced through Law No. 21/2024 themselves demonstrate that the principal obstacle to such developments was not the status of land ownership but rather the environmental protection framework.

Between 2015 and 2017, the Albanian Government undertook one of the most ambitious strategic territorial planning processes at the national level under the vision "Albania 2030 – Integrated, Competitive, Destination." One of the key documents within this framework was the Integrated Cross-Sectoral Plan for the Coastal Belt (ICSP Coast), prepared through a lengthy process of inter-institutional coordination.

Areas such as Zvërnec (N16) were identified as part of the natural system, with a focus on ecotourism, nature-based tourism, low-impact recreational activities, and the promotion of ecological values. The ICSP Coast explicitly states that intensive development should not and cannot become the dominant model along the coastline, while natural open spaces and protected areas must be safeguarded from urban and rural development. At its core, the plan embraces the principle of preserving the ecological continuity of the coastal zone.

This is the primary reason why these legal amendments have been strongly opposed by environmental NGOs, expert groups, and the academic community. It is also why the European

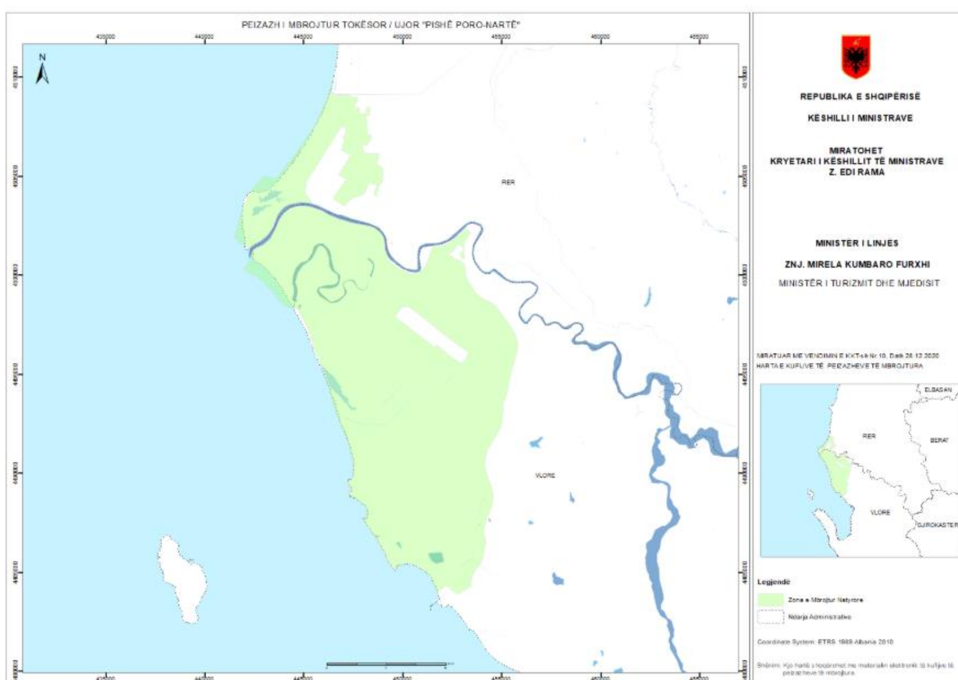
Union has consistently and unequivocally called for the repeal of the amendments introduced through Law No. 21/2024, arguing that they fundamentally undermine nature conservation principles by facilitating large-scale urban development within protected areas.

Three amendments introduced by this law are particularly significant.

First, the list of activities permitted within protected areas was expanded to include activities associated with “high-end tourism,” tourism-support infrastructure, agritourism, and other forms of development that had not previously been considered part of the traditional functions of nature conservation. This change is directly reflected in Council of Ministers Decision No. 596/2024, which re-designates the “Pishë Poro–Nartë” Protected Landscape under the new legal framework.

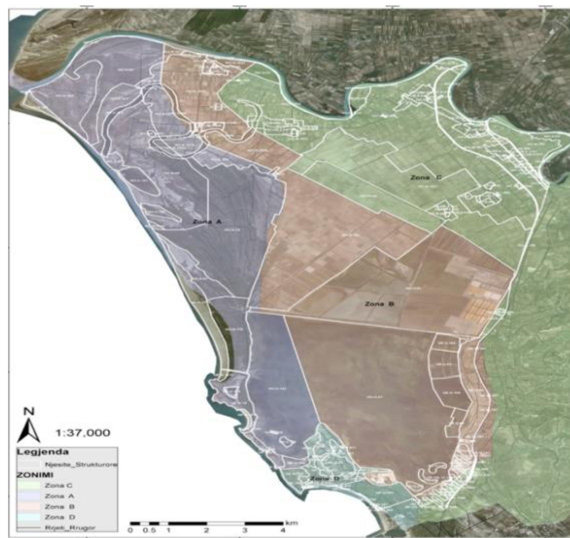
Second, the zoning system for the “Protected Landscape” category was removed. This change carries significant consequences, as zoning served as the mechanism through which different levels of protection were established by defining which activities were permitted and prohibited within specific parts of a protected area. In the case of Pishë Poro–Nartë, Council of Ministers Decision No. 596/2024 no longer includes the subzones that previously existed.

This is particularly important because the area proposed for the Zvërnec resort substantially overlaps with what was formerly considered the core protection zone, where human activity was required to remain minimal, restricted, and temporary. The removal of this distinction has eliminated one of the most important instruments for the effective management and protection of the territory.



Map of the Protected Area: Pishë Poro–Nartë Protected Landscape under Council of Ministers Decision No. 596/2024, in which the internal zoning system no longer exists.

Map of the Vjosë–Nartë Protected Landscape under Council of Ministers Decision No. 680/2004, illustrating the internal zoning system. The Core Zone is identified in green.



Map of the Vjosë–Nartë Protected Landscape as reflected in the 2021 Detailed Local Plan (PDZRK), approved by the National Council of Territory and Water (NCTW), showing the internal zoning system. The Core Zone is highlighted in green.

A Flawed Procedure

The Prime Minister’s argument seeks to create the impression that the Zvërnec project remains at a preliminary stage and that the institutional system is functioning as a rigorous filter for environmental protection.

First, the proposed development appears difficult to reconcile with the broader legal and planning framework governing the area. Beyond environmental legislation, Albania’s territorial planning system, including Law No. 107/2014 “On Territorial Planning and Development”, the National General Territorial Plan “Albania 2030” (DCM No. 881/2016), and the Integrated Cross-Sectoral Plan for the Coastal Area (PINS Coast) approved by NCT Decision No. 2/2016, has consistently identified Zvërnec and the surrounding coastal landscape as an area where conservation, ecological continuity, and low-impact tourism should constitute the dominant development approach.

Second, even a basic review of the procedures followed raises serious questions not only about the way the process is being conducted, but also about its consistency with the spirit of both Albanian and European nature protection legislation.

The Prime Minister himself acknowledges that the National Council of Territory and Water (NCTW) approved the development permit on 30 March 2026, while the environmental authority only decided on 15 May 2026 that the project should be subject to a Comprehensive Environmental Impact Assessment.

This sequence is at odds with both Albanian and European legislation, which require environmental assessment from the earliest stage at which a project proposal emerges, particularly when it concerns development within a protected area or any site of environmental significance. The environmental assessment referred to by the Prime Minister should therefore not serve as an exercise to justify a project that has already been decided upon, but rather as a tool to determine whether the project should proceed and under what conditions.

Under European law, this principle derives both from the Environmental Impact Assessment Directive (Directive 2011/92/EU, as amended by Directive 2014/52/EU) and from the Habitats Directive (92/43/EEC), which requires the procedure known as an Appropriate Assessment for projects that may have significant effects on protected habitats and species within designated conservation areas, such as Emerald Site AL0000008, the "Vjosë–Nartë Wetland System Protected Landscape." In Albanian law, the same principle is reflected in the Law on Environmental Impact Assessment (Law No. 10440/2011), the Law on Protected Areas (Law No. 81/2017), and Council of Ministers Decision No. 912/2015.

This is precisely where one of the greatest weaknesses in the Prime Minister's argument lies. Given that Pishë Poro–Nartë is both an Emerald Site and a Natura 2000 pilot area, and that it contains habitats of high ecological value as well as protected species, European standards require more than a conventional Environmental Impact Assessment.

According to Article 6(3) of the Habitats Directive, any plan or project that may have a significant effect on the conservation objectives of a Special Area of Conservation must undergo a full Appropriate Assessment based on scientific evidence and an examination of alternatives. The Court of Justice of the European Union has repeatedly clarified that a project may only be approved once the competent authority has reached reasonable scientific certainty that it will not adversely affect the ecological integrity of the protected site.

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In this context, the fact that a Comprehensive Environmental Impact Assessment has been required should not be presented as evidence that the system is functioning effectively, but rather as an institutional acknowledgment that the project poses risks of such magnitude that they cannot be addressed through an ordinary assessment procedure. Furthermore, more than two decades of Albanian experience demonstrate that Environmental Impact Assessments have rarely served as instruments for preventing projects with significant environmental impacts. In practice, they have functioned primarily as mechanisms for legalizing and legitimizing decisions that had already been made. The development of the Vlora International Airport in the Vjosa–Nartë protected area is frequently cited as an example, where project implementation advanced despite persistent concerns raised by environmental organizations, scientific experts, and international institutions regarding its impacts on biodiversity and compliance with conservation obligations.

For precisely this reason, in a case of such importance for biodiversity and the public interest, an Environmental Impact Assessment prepared solely by experts contracted by the project developer is not sufficient. An independent scientific and technical review, carried out by experts free from conflicts of interest, is essential before any final decision is taken.

One of the most serious shortcomings in the Prime Minister's argument concerns the way the procedural timeline is presented. The Prime Minister portrays the fencing permit and preliminary on-site activities as routine components of the development process. He further argues that the fencing was necessary to facilitate field measurements and environmental monitoring activities. However, he fails to mention that geological surveys on the site had already begun in early March 2026 and required neither fencing nor access roads. This raises an obvious question: what purpose did the subsequent fencing of the area actually serve?

Once again, the Prime Minister's argument overlooks the fundamental purpose of Environmental Impact Assessment. Under both Albanian legislation and the core principles of European environmental law, environmental assessment is not a procedural formality accompanying a project during its implementation. Rather, it is the instrument that must precede any decision-making and any intervention that may affect the natural values of a protected area.

In this case, on-site works, including fencing, the construction of a work camp, and the opening of access roads, began as early as 30 April 2026. Yet only fifteen days later, on 15 May 2026, the competent environmental authority determined that the project should be subject to a Comprehensive Environmental Impact Assessment. This means that physical interventions had already commenced before the state had officially established the level of environmental scrutiny required for the project and before any comprehensive assessment of its ecological acceptability had been completed. Under such circumstances, the claim that procedures have been followed in the sequence required by law becomes difficult to sustain.

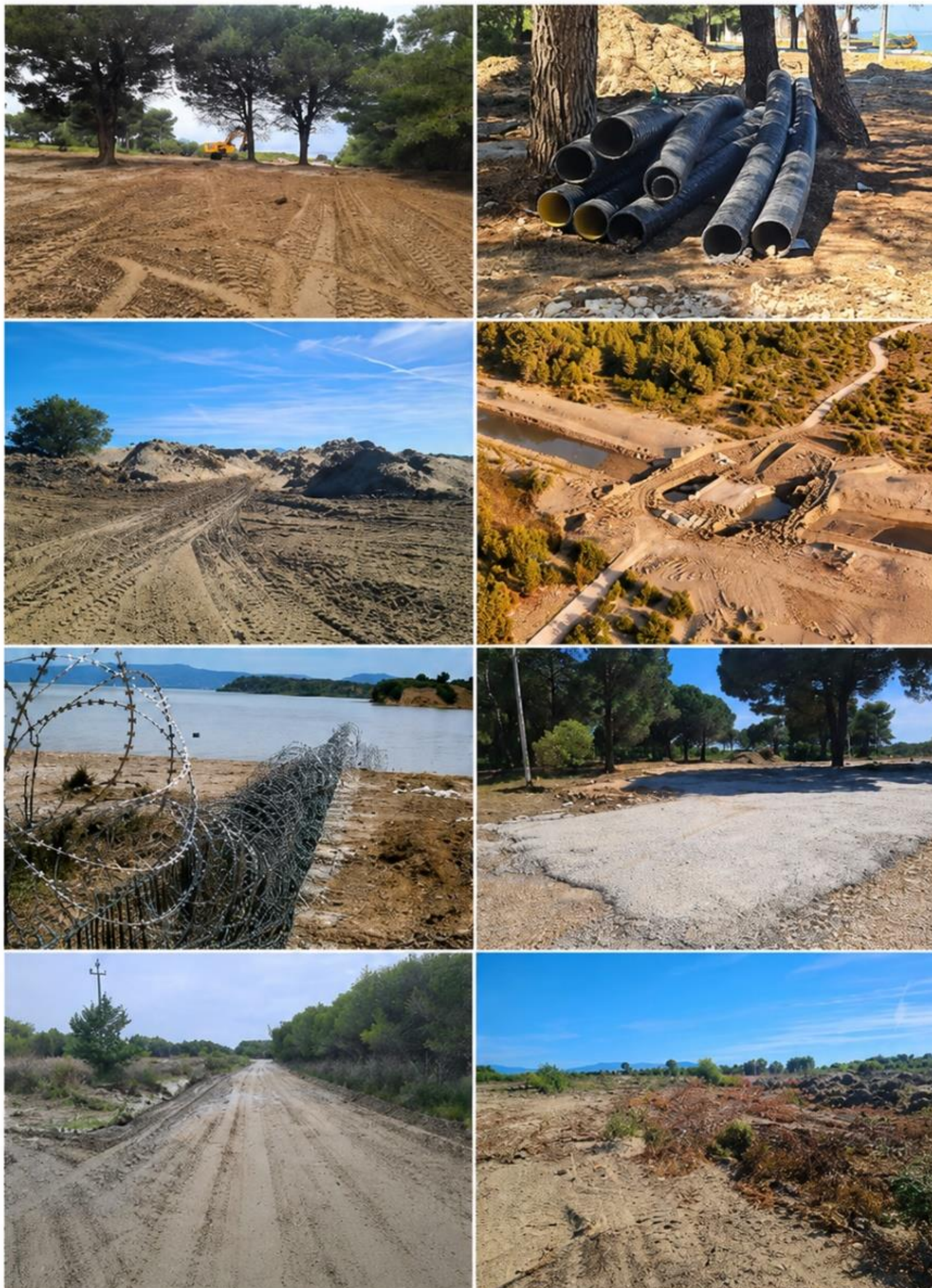
The reason Environmental Impact Assessment is placed at the beginning of the decision-making chain is precisely to document the existing environmental conditions before any intervention occurs, identify the natural values that may be affected, and evaluate possible alternatives. Only on this basis can it be determined whether a project should proceed, be modified, or not be authorized at all. When interventions precede the assessment, part of the baseline information needed for environmental analysis may already have been altered or degraded, thereby undermining the integrity of the assessment process itself.

Field observations conducted after the commencement of works suggest that the preliminary interventions have already caused significant impacts on the area's natural habitats. Operations involving heavy machinery along the beaches of Dajlani and Portonova are believed to have damaged the nesting habitats of the loggerhead sea turtle (*Caretta caretta*), a protected species classified as globally threatened.

The coastal dune systems, which constitute priority habitats under both Albanian and European conservation frameworks, have been affected by the deposition and compaction of construction materials used in the opening of internal access roads. At the same time, interventions in the Portonova channel have the potential to alter water exchange processes between the lagoon and the sea, a mechanism that is essential to the ecological functioning of the entire wetland complex.

Furthermore, the installation of fences and other physical barriers has restricted wildlife movement, while the intensive activity of heavy machinery, trucks, and construction equipment has significantly increased disturbance levels for birds and other species associated with the area's habitats.

These are precisely the types of impacts that a Comprehensive Environmental Impact Assessment is intended to identify, analyse, and evaluate before any intervention is permitted—not after such activities have already begun.



Views of interventions carried out within the Protected Area as part of preliminary works undertaken without environmental authorization.

For this reason, the issue is not merely one of formal compliance with a series of procedural steps. The core problem is that the logic of the process appears to have been reversed: interventions have preceded the assessment, while the assessment risks being used to justify a reality that has already begun to take shape on the ground. This runs counter to the precautionary principle, one of the cornerstones of European environmental law, which requires risks to be identified and assessed before potentially irreversible damage occurs.

The Connection to the Vjosa

The claim that the project area in Zvërnec "has no connection whatsoever to the Vjosa Delta" is, at best, an oversimplification of the ecological and geological reality of the Vlora coastline. No one is arguing that the resort will be built within the boundaries of the Vjosa Wild River National Park or that it will physically encroach upon its protected territory. However, it does not automatically follow that no connection exists between these natural systems.

On the contrary, the Narta lagoon complex, the coastal dunes, the Pishë Poro forest, and the very morphology of this section of the Adriatic coast are the result of geological and hydrological processes that have operated over thousands and even millions of years, in which the Vjosa river system has played a fundamental role. River deltas are not merely points on a map; they are the products of sediment transport and deposition, water dynamics, and natural processes that shape coastal landscapes on a regional scale. In this sense, it is difficult to argue that the Narta Lagoon and the surrounding natural complex have no connection to the processes that have created and continue to influence the Vjosa Delta.

The real issue is the cumulative impact of the developments planned throughout this coastal segment. The Zvërnec–Akërni resorts cannot be viewed as isolated interventions, but rather as part of an increasing development pressure on a natural complex that includes lagoons, wetlands, coastal forests, dune systems, and habitats of particular importance for biodiversity.

This is precisely why European environmental assessment standards require not only the analysis of the direct impacts of an individual project, but also the assessment of its cumulative effects in combination with other existing or planned developments. This is particularly important in a territory where recent legal changes have opened the door to intensive tourism developments within protected areas.

Therefore, referring to the high protection status of the Vjosa National Park does not resolve the debate. The question is not whether the Vjosa is protected. The question is whether the entire Pishë Poro–Nartë natural complex is being managed according to the logic of long-term ecosystem conservation or according to a fragmented, project-by-project development approach.

Category V

The Prime Minister's argument relies on a formal fact: the "Pishë Poro–Nartë" area has been and remains classified as a Protected Landscape (IUCN Category V) since 2004. This is only partially true, as the 2024 amendments effectively merged two previously distinct protected areas into a single designation: the Pishë Poro Managed Nature Reserve and the Vjosë–Nartë Wetland Complex. At the same time, however, the process was accompanied by a significant reduction in the overall extent of the Vjosë–Nartë protected area, most notably through the exclusion of the Vlora Airport site and the hills of Novoselë and Panaja.

Nevertheless, the interpretation of IUCN Category V as if the mere allowance of human activity automatically justifies any proposed development is inaccurate. In reality, a Protected Landscape remains a protected area, and the fundamental objective of this category is the long-term conservation of the natural, landscape, and cultural values that have emerged through the historical interaction between people and nature.

According to IUCN standards, economic activities and land uses are permitted only insofar as they are compatible with maintaining the character of the landscape, ecological integrity, and the habitats that justify its protected status. Category V is therefore not a development category, but a conservation category based on sustainable use.

The fact that the area is not designated as a National Park or a Strict Nature Reserve does not mean that it loses its protective function. On the contrary, public authorities remain under an obligation to ensure that any new intervention does not compromise the habitats, biodiversity, ecological processes, and landscape values for which the area was originally protected.

This is why the debate should not focus on what may theoretically be permitted within a Protected Landscape. The relevant question is whether the proposed development is compatible with the primary objective of this category: the preservation of natural and landscape values for future generations.

A protected area is not defined solely by the name assigned to it on a map. It is defined by its management regime, the restrictions imposed on development activities, the decision-making mechanisms governing its use, and the protection instruments applied in practice. These are precisely the elements that have changed.

The amendments introduced through Law No. 21/2024 expanded the range of activities permitted within protected areas, eliminated internal zoning for the Protected Landscape category, and shifted decision-making authority toward institutions whose primary mandate is territorial development rather than nature conservation. Consequently, the fact that the designation "Protected Landscape" remains unchanged does not mean that the level of protection has remained the same.

Moreover, Pishë Poro–Nartë is unique among Albania's protected areas because it incorporates, in a highly integrated manner, nearly the full spectrum of protected area categories recognized nationally, from Category II to Category VI. Although the area as a whole is designated as a Category V Protected Landscape, it is traversed by the Vjosa Wild River National Park, which enjoys Category II status. In addition, three Natural Monuments classified under Category III are located within its boundaries: the molassic hills of Zvërnec, the Limopuo wetland, and the stabilized dunes of Narta.

The merger of protected areas into a single designation does not diminish the natural values of the former Pishë Poro Managed Nature Reserve, which prior to the 2024 amendments held Category IV status. Furthermore, in September 2025, the entire Vjosa Delta area received international recognition as a Biosphere Reserve under UNESCO's Man and the Biosphere Programme, a designation broadly equivalent to IUCN Category VI standards.

Similarly, citing Article 20 of the 2017 law creates the misleading impression that infrastructure and construction projects have always been permitted without significant restrictions within protected areas. In reality, the legal possibility of considering such projects does not in itself constitute evidence of their acceptability. Every project must pass through the filters of territorial planning, biodiversity protection, environmental assessment, and the public interest.

Moreover, prior to the recent legal amendments, additional safeguards existed, including internal zoning mechanisms that significantly restricted intensive development in the ecologically most sensitive parts of the territory.

The Sazan Argument

Political assurances that Sazan Island will remain state property do not substitute for transparency regarding control, use, and the public interest

The statement that Sazan Island will not be sold and will remain state property does not address the central public concerns. Formal ownership is only one aspect of a legal arrangement. Albania has previously seen cases in which coastal areas have been granted through long-term concessionary or contractual arrangements that raised significant legal and public-interest concerns.

For this reason, issues such as the duration and conditions under which territory is made available, the area to be used, the exclusive rights granted to the investor, the form of state participation, the distribution of profits and risks, restrictions on public access, environmental guarantees, and the possibility of effective oversight by Albanian institutions are equally important.

The Prime Minister himself acknowledges that negotiations have not yet been concluded and that no final agreement, architectural design, or environmental study currently exists. For that very reason, it is impossible to claim in advance that the process demonstrates the protection of the public interest or reflects a “dignified and professional” approach.

Such conclusions can only be reached once the terms of the negotiations, the legal and financial structure of the relationship with the investor, the criteria used to select that investor, and the relevant environmental and territorial assessments have been made public.

The issue is not whether Sazan Island will continue to appear in the cadastre as state property. The issue is what rights over that territory will be transferred to a private entity, for how long, under what conditions, at what cost, and under what level of public oversight. Without this information, political declarations cannot substitute for transparency, nor can they serve as evidence that the public interest has been adequately protected.