

The Environmental Impact Assessment (EIA) report of the Vlora Airport project is an unprofessional, non-scientific and clearly clientelist and abusive analysis to justify the non-transparent and illegal decision-making of the construction of the airport within the Vjosa-Narta Protected Area

Despite numerous calls and constant pressure from national and international civil society organizations to cancel the construction of Vlora International Airport inside the Vjosa-Narta Protected Landscape, the Albanian government has not yet withdrawn from this destructive plan for the nature. Recently, the **Environmental Impact Assessment (EIA)** report for this project has been made public. Based on a preliminary analysis conducted by experts of national environmental organizations and researchers, scientists of the main academic and research institutions of the country, this report has been conducted with a deep lack of professionalism and “on purpose” in favor of the construction of Vlora airport in Akërni area, inside the Vjosa-Narta Protected Landscape.

In this report, it has not been taken into consideration that Vjosa-Narta is classified as an Important Bird Area (IBA), Key Biodiversity Area (KBA), is part of the Emerald network, and that it is protected by various international conventions, that Albania itself has ratified, the violation of which, may face the country with various sanctions that can be undertaken by the European Union and the international community against our country. Among these conventions, we can mention the Berne Convention (signed on January 13, 1990 and entered into force on May 1, 1999), which requires that for the Emerald network areas, as well as for NATURA 2000 sites, for any development project within and near these areas, even if the project is done for strategic purposes, it is necessary to apply the procedure of **Appropriate Assessment**. The Albanian government, the Ministry of Infrastructure and Energy, the Ministry of Tourism and Environment, in the case of such a project with great impact on the environment and especially on avifauna, given the legal status of the area " Vjosa-Narta Protected Landscape", has bypassed this procedure during the Environmental Impact Assessment of the area in question.

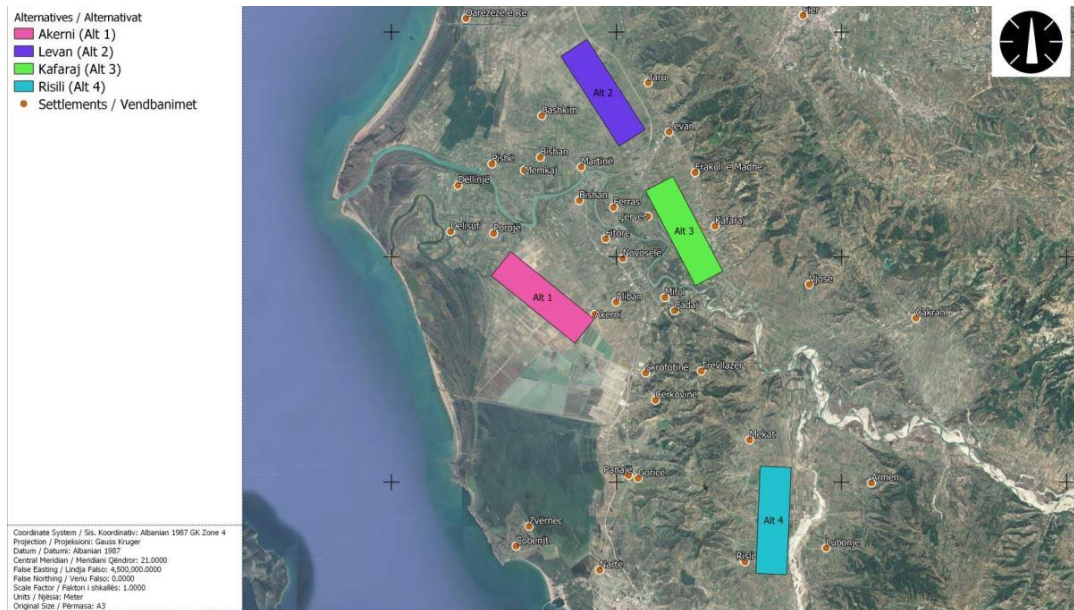
This procedure should ensure that the following questions are answered at the end of its implementation:

- a) Does the project for the construction of Vlora airport have a significant impact on the Emerald area?
- b) How much does the construction phase and especially the operation phase affect on migratory bird routes, including the fact that the project takes place in the area that is part of the "Adriatic Flyway" migration corridor?
- c) How much does the project in question affect the ecological integrity of the EMERALD area as well as the EMERALD ecological network of the Albania and beyond (as part of the Adriatic Flyway)?
- d) What will be the incidence of birds colliding, especially large and medium-sized ones, with airplanes (*Bird collision phenomenon*) during landing and take-off of airplanes, to show whether or not the airport will have a negative impact on birds and other species which are part of Resolution No. 6 (1998)? Based on the literature, about 90% of aviation incidents with birds occur below the altitude of 1000 m, and within this altitude, the most common accidents (over 90%) with birds occur at altitudes of 100-300 m and this altitude band will be that which is mostly used by airplanes during takeoff and landing on the designed airbase of Vlora airport.
- e) What will be the other alternatives for this project that would be less environmentally sensitive and safer from the point of flight safety?

Such an Appropriate Assessment procedure should have been open to foreign experts as well, and at the end, the result and decision-making would be different.

Moreover, the current document of the Environmental Impact Assessment (EIA) is a study with many inaccuracies, deep lack of professionalism and bias in its entire content. The coalition of environmental organizations and specialists from the country's academic / research institutions (listed at the end of this announcement) considers the assessment to be intentional to "justify" the government's decision to build the airport, exactly where the existing traces of the former military aerodrome, as a decision which was already taken "de facto" before the completion of the Environmental Impact Assessment process. We base this arbitrariness on determining this location on several key arguments.

In Chapter III, page 12, for "Description of the analysis of possible alternatives for project implementation" are considered and further evaluated 4 alternatives which are: (i) Akërne, (ii) Risili, (iii) Kafaraj and (iv) Levan areas.



Map with the alternatives for the construction of Vloara airport

The evaluation of alternatives is based on 3 sets of indicators: (i) environmental indicators, (ii) natural resources and (iii) noise and air impact receptors.

Based on the assessment that has been realized, it results that the first alternative for the construction of the airport is Akërne with -11 points, followed by Risilia with -19 points, further by Kafaraj with -20 points and last Levani with -22 points.

In the three sets of indicators used to evaluate the alternatives, 12 specific indicators were considered as follows:

1. Current land use
2. Impact on aquatic environments
3. Impact on the air
4. Impact on biodiversity
5. Impact on human receptors
6. Impact on fauna receptors
7. Birds as receptors
8. Agro-productive quality of soil
9. Agricultural Intensity
10. Crossing bird routes
11. Presence of road network
12. Proximity to Tirana airport

Limiting the assessment with this set of indicators is in itself a biased, influenced and intentional approach to decide on Akërne area as the best alternative.

Tabela III-1: Përmbledhje e ndikimeve për secilen alternativë të vendndodhjes së Aeroportit

Indikatori Ndikimi	Alternativat e vendndodhjeve të diskutuara/vlerësimi në intervalin -5 deri +5			
	Akërnë	Risili	Kafaraj	Levan
Përdorimi aktual i tokës	+5	-5	-5	-5
Uji	-3	-1	0	0



14

RAPORTI I THELLUAR I VLERËSIMIT TË NDIKIMIT NË MJEDIS TË AEROPORTIT TË VLORËS



Ajri	-2	-1	-1	-1
Biodiversiteti (Flora&Fauna)	-5	-1	-1	-2
Receptorët Humanë	-1	-2	-3	-4
Receptorët faunistikë	-5	-1	-1	-2
Zogjtë si receptorë	-4	-2	-1	-2
Cilësia agroprodhuese e tokës	+5	-4	-5	-4
Intensteti bujqësor	+5	-3	-3	-3
Kryqëimi i rrugëve të shpëndëve	-3	0	-1	-1
Rrjeti rrugor	+4	+1	+2	+3
Afërsia nga aeroporti i Tiranës	0	0	-1	-1
Totali i pikezimit	-11	-19	-20	-22

Set of indicators used to evaluate the alternatives and rating of the alternatives

First, a number of indicators of essential importance, as follows, have been left out of the assessment and have not been taken into account by the authors of the EIA:

- The fact that **the area where the airport will be built is a Protected Area** and is protected by Albanian nature conservation legislation has not been taken into account as a specific environmental indicator.
- The fact that **the area in question is part of international ecological networks** and is protected by conventions which Albania has ratified has not been taken into account as an indicator and has not been assessed.
- The fact that the decision-making creates an international reaction that negatively affects other national priorities of Albania has not been considered as an indicator and has not been evaluated, among the major ones such as the case of aspiration for the country's integration into the European Union and violation of Union legislation for the Conservation of Nature which has been transposed to about 90% of the national legislation. The destruction of the country's image by this investment and the impact of sustainable natural tourism with high development potential in Albania has not been taken into consideration either.
- The use of the area for other economic activities that are currently taking place in the area and that have potential for future development has not been considered.
- Factors of natural disasters have not been taken into account, such as floods, for which the projections of the European Climate Agency predict that the Akërnë area where the airport is planned to be built has a high risk of floods by 2050.

Secondly, the indicators that are considered as a disadvantage for Akërnë and in favor of other areas are given in a manipulative way by hiding facts.

- For the indicators of Land Use, Agro-Production Quality and Agricultural Intensity**, Akërnë area has received full points (+5 points) indicating a complete non-use in agricultural aspects of this area. This assessment is a clear deception as the territory of Akërnë has a wide and very intensive use for grazing small and large cattle. The authors intentionally did not evaluate the pasture as an area for agricultural use and this constitutes an open manipulation. From these

indicators that Akërni has received 15 positive points and this is the biggest abuse in the assessment as it has artificially increased the rate of Akërnia, as a land area that is not used for anything, when in fact the territory is used extensively for grazing. While for other areas, the assessment with a grade of -5 is still inappropriate, as a significant part of these areas has the same use as Akërni, that of pasture for livestock and only a part of them is cultivated.

b) **Impact on water quality**

For Akërni, the impact on water quality has been assessed with a rate of -3. Considering that the area where the airport in Akërni is planned to be built is part of a previously reclaimed wetland area and contains a wide network of drainage canals that connect the Narta Lagoon and also affect the coastal area, this assessment is inappropriate and clearly made to hide the real impact that the construction of an airport would have on the water quality of this territory.

c) **Birds as receptors**

Vjosë-Narta is known nationally and internationally for its importance to birds. The area is documented as a nesting site for a considerable number of species of that habitat type as well as a stop-over area during migration and wintering. As the other areas have intensive agricultural use, it is expected to have lower bird presence. Again, in this indicator it is evaluated in a biased way, in order to reduce the importance of Akërni as a territory of very high importance for birds.

d) **Crossing of bird routes**

The area is documented as a migration route for a large number of bird species of different orders and as such, had to be rated at - 5. Again, when comparing with other areas, it seems clear the siding to reduce the importance of Akërnia as a territory of very high importance for birds and to artificially increase the importance of other alternatives.

e) **Road network**

Road network evaluation does not follow any clear logic in rating. Akërnia is rated with +4 points, while Levan with +3 points, although the location of Levan is much closer to the intersection of the highway Fier-Vlora with the road Levan-Tepelena-Gjirokastra and therefore gives faster access to a part of the south than the alternative of Akërni. Furthermore, the Risilia alternative is evaluated with only +1 point in terms of road network, although Risilia is the closest alternative to the new Vlora by-pass and the road of Vlora River, two strategic roads for the fast automobile connection of the south coast and for the development of tourism.

This rating indicates a deep lack of knowledge among the authors of the EIA in terms of road infrastructure in the country and it is clear that the only purpose of this rating is to decide on Akërnia as the best alternative in terms of road network and in disfavor of the other alternatives.

In Chapter IV. Description of the condition and existing values of the environment:

a) The issue of geology has not been sufficiently and properly elaborated. Furthermore, the flood factor has not been taken into account.

b) No assessment has been made on the impact that the noise factor will have on biodiversity. Also, in this report it is stated that there is no plan on how to act on the impact that the noise will have on the villages of Akërni, Poro, Delisuf, etc., despite the fact that these villages will be most affected by this investment.

c) Numerous inaccuracies are noticed in the report, and in some cases the information about the vegetation of the area is found expressed in the fauna chapter.

d) The importance of habitats in the area planned for the construction of the airport has been devalued, stating that the area where the airport is planned to be built does not have important plant species, and is even very poor, not taking into account the fact that this area is still under the process of a scientific assessment regarding the habitats of the Natura 2000 network of the European Union Habitats Directive, as a non-negotiable integration precondition for Albania, under the requirements of Chapter 27 (Environment and Climate Change), of the integration process of the country in the EU.

Fauna

- a) Data on the presence of medium and large mammals are not sufficient, based on sporadic observations made by experts. In addition, essential elements such as the map of findings in the area, the analysis performed, and the methods used for data collection, are not mentioned.
- b) It is not clearly defined and it is necessary to emphasize the importance of Albanian legislation, the Berne Convention and the IUCN Red List in the protection of mammals.
- c) The presence and activity of medium and large mammals should not be focused only on the construction area, but analyzed at the ecosystem level, as depending on the species, they have a wide or large homerange.
- d) The information expressed in the chapter V, "Impacts on fauna" during the construction and operation phase, which describes the results with devastating impact on habitats, is considered contradictory, as on the other hand they state that it is unlikely or not verified to threaten some native plants associations and other species associated with these habitats.

Avifauna

Taking into consideration the assessments made for this chapter, we conclude that there was a lack of relevant specialists in the EIA working group for the study of the Aves class, clearly reflecting the pronounced incompetence of this working group. The term "zog" similarly with "chick", is used in the report instead of the term "birds". In ornithology, the term "bird" has a technical meaning and means birds from the age of hatching to the moment they fledge. Furthermore, there are a considerable number of cases that reflect the scientific inability of the working group to carry out the necessary studies for avifauna as follows:

- (i) the EIA reported the presence of large numbers of American flamingos (*Phoenicopterus ruber*), which is a species that is not present on the European continent, but is located on the American continent
- (ii) for magpie (*Pica pica*), is placed the photo of another species not found in Albania;
- (iii) for the common wood pigeon (*Columba palumbus*) a photo of another species has been placed;
- (iv) the scientific name of the Dalmatian Pelican is written "Dalmatian Pelican" while it is "*Pelecanus crispus*";
- (v) Reporting that 100% of the Audouin's Gull (*Larus audouinii*) is found in the Vjosa-Narta protected landscape is considered incorrect.
- (vi) for the Great crested grebe (*Podiceps cristatus*) a photo of another species is placed, etc.

Furthermore, the description of the species is inaccurate in some cases, the language used is in many cases meaningless, and the terminology used is amateur. To conclude, the methodology followed for the study of avifauna does not allow obtaining the necessary results for a full assessment of the importance of the area in terms of this class.

In Chapter V. Assessment of the risk for bird collision with aircraft

- a) It is stated that a special study has been conducted and a report has been drafted entitled "*Risk assessment of birds*" but no concrete action is shown to reduce the risk of collisions with the migratory birds. On the contrary, it is said that "*modern aircraft engines are designed to withstand the flocks of birds.*"
- b) The birds route map is extremely meaningless in the way it is compiled.
- c) The fact that they do not consider the real risk to airplanes due to the large presence of birds in the area, is accompanied by taking measures to avoid birds in the vicinity of the area, indicating that the construction phase, in particular, will have a very large impact on current bird populations. This risk, not considered by them, is considered as a factor that favors other alternatives for building the airport, outside the protected area.