

## MEDITERRANEAN ALLIANCE FOR WETLANDS



November 25th, 2019

Mr Edi Rama  
Prime Minister of Albania  
Bulevardi Dëshmorët e Kombit, Nr. 7,  
1001 Tiranë, Shqipëri  
Albania

Mr Klosi  
Minister of Environment and Tourism  
Bulevardi Dëshmorët e Kombit, Nr. 1,  
1001 Tiranë, Shqipëri  
Albania

Ref : JJAAN 01022019

**Object: Current revision of the network of protected areas and coastal wetlands**

Dear Mr Rama, Dear Mr Klosi,

The Mediterranean Alliance for Wetlands is a network of research organizations and environmental NGOs, whose aim is:

*“To raise collectively the profile of wetlands in the Mediterranean society at large and in particular in national, regional and international policy through the promotion of innovation and the use of evidence-based best practices as catalyst for change”.*

To date the Mediterranean Alliance for Wetlands includes 25 organizations from 14 Mediterranean countries. The members of the Mediterranean Alliance for Wetlands have been informed of the ongoing reassessment of the protected area network in Albania.

Since the previous revision of the network took place in 2004, we appreciate the necessity of such a process. In particular, we welcome the planned enlargement of the protected area network in this context. With great interest we have also learned about the Decision No. 16/3 dated 04.03.2019 of the Committee on Strategic Investments to refuse the Mabetex Project 'Resort Divjakë Albania', which was planned within Divjakë-Karavasta National Park. This decision, taken on the ground of environmental concerns, is an example of responsible decision-making, and we therefore expect the Albanian Government to implement it swiftly. At the same time, we are also concerned by the modalities through which this revision process is conducted, allocating very little time for NGOs and civil society effective participation, as well as by the exclusions that may take place as a result.

The assessment process includes a reconsideration of the current boundaries of all protected areas in Albania, which, according to the current planning, would result in a reduced size of several protected areas along the Albanian coast. We are aware that many protected areas in Albania face various challenges and are seriously threatened by degradation. However, decreasing the size of protected areas due to an unsatisfactory conservation status as consequence of insufficient management and law enforcement is an invitation to all opponents of specific protected areas to degrade them and in consequence request the cancellation of the protection status.

We are most concerned by the coastal wetlands. These sites have outstanding natural heritage value for the whole of Europe and contribute to societal benefits in many ways. In this respect, Buna River-Velipoja Protected Landscape, Divjakë-Karavasta National Park and Vjosa-Narta Protected Landscape belong to the most important wetland complexes in the Adriatic basin. They represent key sites for wildlife, are visited annually by millions of migratory waterbirds, and are also a key asset for the local economy and sustainable development. This uniqueness is outstanding considering the fact that more than 70 % of the Albanian wetlands have already been degraded or even completely drained since the mid-20<sup>th</sup> century.

Against this background, we are deeply concerned about several large-scale infrastructure and tourism development projects, which are planned within the boundaries of currently protected coastal wetlands. These include:

- Vlorë International Airport within the Narta-Vjosa Protected Landscape (NVLPA);
- Solar Power Plants in both Divjakë-Karavasta National Park (DKNP) and NVLPA;
- Large tourism resorts in almost all coastal protected areas;
- Intensive farming and aquaculture in DKNP;

Unfortunately, we have the impression that the re-assessment of Albania's protected area network is being misused to pave the way for grey infrastructure projects that would be much harder or even impossible to implement within the current boundaries of the mentioned protected areas.

Drawing lessons from the entire Mediterranean basin, it is clear that coastal wetlands represent a real strength for Albania in terms of biodiversity value, of the numerous ecological services provided to the Albanian people, and of the image of Albania. The protection status of these wetlands shouldn't be considered as an obstacle to the country's development, but as a key advantage for the future of the Albanian nation and its people. In this context, the Mediterranean Alliance for Wetlands considers that initiatives to decrease the size of existing protected areas along the coasts would be extremely negative and

unacceptable. They would be in breach with the international commitments of Albania in the framework of the Ramsar Convention, the Bern Convention and the Bonn Convention.

The Mediterranean Alliance for Wetlands therefore urges the Albanian government to reconsider **the criteria of the current re-assessment process and to withdraw all plans to shrink the size of protected areas in coastal wetlands, but to identify the needs of those protected areas and to invest in a better management of the sites and to improve law enforcement.**

In this respect, the Mediterranean Alliance for Wetlands looks forward to contributing to a dialogue on the future of wetlands along the Albanian coast combining their protection and the sustainable use of their resources.

Sincerely yours,

The member organizations of the Mediterranean Alliance for Wetlands whose logos are on top of this letter.

Cc:

Delegation of the European Union to Albania  
Mr. Karmenu Vella, EU Commissioner on Environment  
Ms. Martha Rojas-Urrego, General Secretary of the Ramsar Convention  
Ms. Amy Fraenkel, Acting Executive Secretary of the Bonn Convention  
Ms. Iva Obretenova, Secretary of the Bern Convention  
M. Jacques Trouvilliez, PNUE/AEWA Executive Secretary