

**For the attention of
the ENVI Secretariat and Members of the Committee on the
Environment, Climate and Food Safety
with a copy to AFET and the relevant Albania rapporteur
European Parliament**

Subject: Request for ENVI follow-up on Albania's Chapter 27 environmental commitments in Vjosa-Narta / Pishë Poro-Nartë

We write as United Diaspora for Albania to introduce this executive brief and supporting evidence pack concerning Vjosa-Narta / Pishë Poro-Nartë. We respectfully ask ENVI to seek the following written follow-up from the European Commission:

1. **In the interests of transparency**, we ask ENVI to request that the European Commission confirm whether it has received the following documents and, where legally possible, make them public:
 - a. Complete Environmental Impact Assessment (EIA/VNM) file submitted by or on behalf of "Zvërnec South Adriatic Development" sh.p.k.
 - b. Public consultation records
 - c. Environmental decision or declaration and supporting documents, including protected-area maps, project-footprint material and development or building permits
2. **In the interests of lawful and EU-compliant decision-making**, we ask ENVI to request that the European Commission provide its written assessment of the compatibility of Albania's Law No. 21/2024 and related project-level decisions with:
 - a. Chapter 27: Environment and Climate Change
 - b. EU environmental standards
 - c. The extent of projected alignment with Natura 2000
 - d. Aarhus public-participation standards
 - e. Bern Convention obligations
3. **In the interests of environmental protection**, and pending verification, we ask ENVI to request that the European Commission clarify the interim safeguards applying and encourage the Albanian authorities not to undertake irreversible works or new permitting and construction interventions in protected areas.
4. **In the interests of public participation and building trust**, we ask ENVI to request that the European Commission encourage the relevant Albanian institutions to support an independent review by an internationally recognised technical body or consultancy to conduct or independently review the EIA/VNM, in view of the low level of public trust in the current process.
5. **We ask ENVI (Committee on the Environment, Climate and Food Safety) to request that the European Commission provide written follow-up on Vjosa-Narta / Pishë Poro-Nartë** during the 14 July 2026 exchange of views, including whether Albania has supplied the complete EIA/VNM file, public consultation records, environmental decision or declaration, development and building permits, protected-area maps, project-footprint documents and the legal basis for any works. We further ask the Commission to assess the compatibility of Law No. 21/2024 and related project-level decisions with Chapter 27, EU environmental standards, future Natura 2000 alignment, Aarhus public-participation standards and Bern

Convention obligations. Pending verification, we ask ENVI to seek clarification on interim safeguards and encourage a moratorium on irreversible works, new permitting and construction interventions in protected areas. We also ask ENVI to request that the Commission encourage the relevant Albanian institutions to appoint an independent, internationally recognised third-party consultancy to conduct or independently review the EIA/VNM.

We would be grateful if this submission could be circulated to the relevant ENVI Members and officials and considered as part of the Committee's follow-up on environmental protection and Albania's accession commitments.

Enclosures:

1. Executive Summary
2. Supporting Evidence Pack, Files 01–06
3. Annexes

Yours sincerely,

United Diaspora For Albania

This submission was prepared, reviewed and supported by members and collaborators of United Diaspora for Albania. The full list of internal signatories and contributors, including their roles and stated capacity of participation, is available here: [Signatories and Contributors to ENVI Submission Pack for the 14th July ENVI Committee](#)

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Executive Summary

Executive brief for Members of the European Parliament ENVI Committee

Vjosa-Narta / Pishë Poro-Nartë: Chapter 27 Accession-Monitoring Submission to ENVI

Supporting transparent, lawful and EU-compatible environmental decision-making in Albania's accession process.

Submitted by United Diaspora for Albania

Institutionally endorsed by: [RiverWatch](#), [EcoAlbania](#), [AlbNatyra](#), [Agrien](#), [Une Gruaja](#)

1. About us

- a. United Diaspora for Albania is a community-led Albanian diaspora group working to support democratic accountability, environmental protection and Albania's European integration. We bring together publicly available Albanian and European Union records, documented civil-society concerns and focused questions for institutional follow-up.

2. Why EU law and frameworks should be considered

- b. We contend that Vjosa–Narta should be treated as a live test of Albania's implementation of Chapter 27: Environment and Climate Change. The case concerns how Albania is aligning with and implementing the environmental acquis through the accession framework, particularly in relation to environmental assessment, public disclosure, meaningful public participation, permitting and verified compliance with nature-protection standards before irreversible works proceed.
- c. The EU's own accession framework already identifies the central risk. The EU Common Position on Cluster 4 confirms that Chapter 27 sits within the Green Agenda and Sustainable Connectivity cluster, and records Albania's commitment to implement the Cluster 4 acquis by accession, subject only to specified Chapter 27 transitional requests.¹ The same Common Position states that amendments to Albania's Law on Protected Areas (Law No. 21/2024), together with the extension of the strategic-investments framework, raise concerns because they permit tourism and industrial investment in protected areas and risk compromising ecological and biodiversity values, including potential Natura 2000 sites, in conflict with EU standards. The provisional-closing benchmark for Chapter 27 expressly requires alignment with the EU nature-protection acquis, including repeal of the incompatible provisions introduced through Law No. 21/2024 and termination of the 2015 strategic-investments legislation²

3. Relevance to ENVI

- a. The EU Common Position on Cluster 4 requires Albania to align with, implement and enforce the environmental acquis; conduct inclusive EIA/VNM and SEA procedures with effective public involvement; strengthen inspection and enforcement; repeal the incompatible provisions introduced through Law No.

¹ <https://data.consilium.europa.eu/doc/document/AD-15-2025-INIT/en/pdf?>Green Agenda and Sustainable Connectivity, 12 September 2025, pp. 2-3.

² [Council of the European Union, AD 15/25 CONF-ALB 12/25, pp. 11 and 30](#) (Law No. 21/2024 concerns and Chapter 27 provisional-closing benchmark requiring repeal of incompatible protected-area provisions).

21/2024; terminate the 2015 strategic-investments legislation; prepare and manage the Natura 2000 network; and demonstrate capacity to implement the Birds and Habitats acquis by accession.³

- b. Chapter 27 requires progress to be assessed not only through formal legislative alignment, but through effective implementation and enforcement of the environmental acquis. ENVI's scrutiny is therefore relevant to whether the Commission is verifying Albania's commitments against the EIA/VNM, consultation, permitting and enforcement record for Vjosa–Narta.
- c. The case engages the EIA/VNM and SEA frameworks, public participation, access to environmental information and justice, potential Natura 2000 protection, the Birds and Habitats acquis, and inspection and enforcement against environmental harm in protected areas
- d. The Commission's 2025 Albania Report states that Albania has only some level of preparation in relation to Chapter 27 and made no progress during the reporting period. It calls for full alignment, implementation and enforcement of the Environmental Impact Assessment (EIA/VNM) and Strategic Environmental Assessment (SEA) Directives; compliance of infrastructure investments with EU environmental and climate acquis and national and international nature and water obligations; and public participation⁴.

4. EU-level record of associated development activity in Albania

- a. The Commission reports poor EIA/VNM quality, low public participation, limited enforcement and weakened inspection capacity, particularly in protected areas. It also states that Albania's Law No. 21/2024, amending Law No. 81/2017 "On Protected Areas," led to deterioration in nature protection⁵. Construction of Vlora Airport within Pishë Poro–Nartë has meanwhile continued despite Bern Convention requests in 2023 and 2024 for suspension pending a new and sufficient EIA/VNM procedure.⁶

5. Central legal and governance concern

- a. In relation to Albania's EIA/VNM framework, assessment, consultation, competent-authority review and an environmental decision or declaration must precede lawful development approval⁷.
- b. The accession question is whether these requirements and the Chapter 27 benchmarks are being applied to projects affecting protected areas. Where the EIA/VNM file, consultation record, environmental decision, permits, protected-area maps or project footprint remain undisclosed or unverified, the

³ [Council of the European Union, AD 15/25 CONF-ALB 12/25](#), pp. 11-12 and 29-30 (EIA/SEA, public involvement, Aarhus access, Birds and Habitats acquis, potential Natura 2000 sites).

⁴ [European Commission, SWD\(2025\) 750 final, Albania 2025 Report](#), 4 November 2025, Chapter 27 summary and recommendations, pp. 15-16.

⁵ European Commission, [Albania 2025 Report](#), SWD(2025) 750 final, 4 November 2025, pp. 77–78; Republic of Albania, [Law No. 21/2024 of 22 February 2024, "On several additions and amendments to Law No. 81/2017 'On Protected Areas'"](#)

⁶ [European Commission, Albania 2025 Report](#), SWD(2025) 750 final, 4 November 2025, Chapter 27 section, p. 77; Standing Committee of the Bern Convention requests referenced for December 2023 and December 2024.

⁷ [Republic of Albania, Law No. 10440/2011](#) on Environmental Impact Assessment, provisions defining EIA procedure and requiring the competent authority to ensure EIA compliance before development approval.

Commission should clarify the applicable interim safeguards and whether irreversible works should remain paused.

6. Requested Commission follow-up

ENVI members are invited by Albanian civil society actors to request written clarification from the Commission on the following points:

- whether the Commission has received the full EIA/VNM file for developments affecting the Vjosa-Narta / Pishe Poro-Narta / Zvernec area, including applications, scoping decisions, environmental reports, environmental declarations or decisions, and any preliminary decisions;
- whether the public consultation record has been disclosed, including notices, minutes, participants, objections, official responses, and evidence of participation by local communities and environmental civil society organisations;
- whether the Albanian authorities have disclosed all development permits, building permits, KKT/KKTU decisions, environmental permits, protected-area maps, zoning documents and project-footprint documents relevant to the affected protected area;
- what timetable and legal pathway Albania has provided for repealing the incompatible provisions introduced through Law No. 21/2024 and terminating the 2015 strategic-investments legislation;
- what interim safeguards apply until repeal/correction is completed, including whether any permitting, strategic-investment approval, construction work or development intervention in protected areas may proceed by relying on provisions already identified as incompatible with EU nature-protection standards;
- whether the Commission will ask Albania to ensure a moratorium on new permitting procedures, construction works and development interventions in protected areas until compliance with EU nature-protection standards is verified;
- whether the Commission will ask Albania to request, facilitate or support an independent third-party technical review of the EIA/VNM process, project impacts, public consultation record and compliance with EU environmental and nature-protection standards; and
- whether Vjosa-Narta will remain subject to explicit Chapter 27 monitoring, including in relation to the EIA/VNM and SEA Directives, Aarhus standards, the Bern Convention, the Birds and Habitats Directives, potential Natura 2000 obligations, and protected-area enforcement.

Closing position

Vjosa-Narta is a Chapter 27 test case because it asks whether Albania's EU accession path is measured only by legislative commitments, or by effective protection of EU environmental standards when protected areas face irreversible development pressure. We ask ENVI to seek clear written follow-up, so that the question of what works are permitted or pursued in the interim is subject to due scrutiny, transparent decision-making and the requisite protections in the intervening period.

File 03 - Legal and Administrative Chronology

Chronology of EIA/VNM, Permitting and Enforcement

Vjosa-Narta / Pishë Poro-Nartë | Principal event period: 30 April-10 July 2026 | Record reviewed to 13 July 2026

Purpose	To present a source-based chronology of the principal permitting, site-activity, inspection, environmental-assessment and institutional-response records concerning Vjosa-Narta / Pishë Poro-Nartë.
Scope	The principal review period is 30 April-10 July 2026, with the record reviewed to 13 July 2026 . Earlier administrative records are included only where necessary to explain the status of later applications, permits and works.
Relationship to the submission pack	The domestic legal framework is addressed in File 04; the Chapter 27 implications in File 05; and evidential status, annex locations and outstanding spatial records in File 06 and annex.

Terminology

- **EIA/VNM** refers to Environmental Impact Assessment / *Vlerësimi i Ndikimit në Mjedis*;
- **AZHT** refers to Territorial Development Agency / *Agjencia e Zhvillimit të Territorit*;
- **AdZM** refers to Regional Administration of Protected Areas;
- **IKMT** refers to National Inspectorate for Territorial Protection / *Inspektorati Kombëtar i Mbrojtjes së Territorit*;
- **KKT/KKTU** refers to the National Council of Territory / National Council of Territory and Water.
- **BIRN** refers to Balkan Investigative Reporting Network (BIRN)

1. Purpose and evidential approach

- a. This chronology records the administrative and institutional record available as at **13 July 2026**. It does not determine the legality, validity or legal effect of any project or administrative act.
- b. Official acts and institutional statements are distinguished from meeting agendas, reproduced correspondence and attributed public reporting. An agenda entry establishes that a proposal was listed for consideration; without the signed act and annexes, it does not establish the final terms, conditions or current status of any resulting decision.
- c. Where a primary record could not be located, this is stated expressly. Its absence from the publicly accessible record reviewed is treated as an evidential gap, not as proof of its existence, non-existence, validity, invalidity, suspension, withdrawal or revocation.

2. Relevant administrative history preceding 30 April 2026

Table 1. Preceding permit and protected-area record

Date / period	Record	Evidential status	Administrative significance
25 September 2024	Council of Ministers Decision No. 596 designated Pishë Poro-Nartë as a Category V protected aquatic and terrestrial landscape and repealed Decision No. 694/2022. The same day, the KKT agenda listed a development-permit proposal for a “Resort Turistik” in Zvërnec by “Zvërnec South Adriatic Development” sh.p.k. ¹	Official protected-area decision; official KKT agenda.	Decision No. 596 is the operative protected-area designation instrument identified in the record reviewed. The signed decision corresponding to agenda item 19 was not located.
28 January-27 March 2025	The KKTU agenda listed a construction-permit proposal for residential blocks F1V2, F1V3 and F1R6. Faktoje reproduced an AZHT written response stating that Decision No. 39 had conditionally approved the application, that the applicant withdrew it on 27 March 2025, and that the decision is no longer in force. ²	Official agenda; official AZHT response reproduced by Faktoje.	This earlier construction-permit procedure should not be treated as an active permit for the later 2026 works.

¹ [Council of Ministers Decision No. 596, 25 September 2024](#), “On declaring Pishë Poro-Nartë a protected aquatic/terrestrial landscape (Category V)”, points 1-4, 8 and 11; National Council of Territory, agenda of 25 September 2024, item 19.

² [National Council of Territory and Water, agenda of 28 January 2025](#), item 39; [Faktoje, “E vërteta e lejes së ndërtimit për projektin në Zvërnec”](#), 16 June 2026, reproducing AZHT’s written confirmation that Decision No. 39 was conditionally approved, the application was withdrawn on 27 March 2025 and the decision is no longer in force.

Date / period	Record	Evidential status	Administrative significance
18 April 2025	The KKTU agenda listed a development-permit proposal for a “Resort turistik” (touristic resort) in Zvërnec by the same developer. ³	Official KKTU agenda - proposal listed; signed decision not disclosed.	The complete signed decision and annexes were not disclosed in the public record reviewed.
30 March 2026	The KKTU agenda listed a development-permit proposal for “Zvërnec Peninsula - Kompleks multifunksional, banimi, shërbimesh, hotelerie, rekreacion, marina” (Multifunctional complex i.e., residential, service, hospitality, recreational, and marina facilities), with buildings of one to eight floors. ⁴	Official KKTU agenda - proposal listed; signed decision not disclosed.	The complete signed decision, conditions, plans and annexes were not disclosed.
29 April 2026	The KKTU agenda listed an infrastructure building-permit proposal for fencing and preparatory works for access roads within the property, naming “Zvërnec South Adriatic Development” sh.p.k. ⁵	Official KKTU agenda; Decision No. 5 subsequently identified in an IKMT statement; signed decision and annexes not disclosed.	The agenda identifies the proposed activity. However, the signed text, annexes and conditions of Decision No. 5 were not disclosed.

3. Chronology of site activity and institutional response

Table 2. Principal review period

Date / period	Record	Evidential status	Administrative significance
30 April 2026	Reporter/BIRN recorded trucks, excavators, fencing and ground-level activity near Hidrovori beach, within the Pishë Poro–Nartë protected landscape. The reporting included dated photographs and witness accounts. ⁶	Reputable media reporting supported by photographs of local residents, NGOs, and interviews.	Establishes a reported start of physical activity. The precise legal classification of each activity remains dependent on the permit and inspection files (not disclosed publicly).
2 May 2026	BIRN reported that AdZM Vlora inspected the site and ordered the suspension of works. When asked for a construction permit, company representatives reportedly presented AZHT correspondence stating that the KKT's 29 April approval of preparatory works had not yet been countersigned and remained under review. An AdZM employee stated the document's legal meaning could not be interpreted locally and was referred to Tirana authorities by the company representatives. ⁷	Reported institutional action; underlying inspection and suspension acts not disclosed.	The scope, legal basis, date of effect and operative terms of the reported suspension cannot be verified without the primary act.

³ National Council of Territory and Water, agenda of 18 April 2025, item 12: development-permit proposal for a tourist resort in Zvërnec.

⁴ [National Council of Territory and Water, agenda of 30 March 2026](#), item 41: “Zvërnec Peninsula - Kompleks multifunksional, banimi, shërbimesh, hotelerie, rekreacion, marina” (English Translation: “Zvërnec Peninsula - multifunctional complex for residential, service, hotel, recreational and marina uses,” comprising buildings of one to eight storeys.), one to eight storeys.

⁵ [National Council of Territory and Water, agenda of 29 April 2026](#), item 5: infrastructure building-permit proposal for fencing and preparatory access-road works within the property.

⁶ [Vladimir Karaj, “Resorti luksoz i Zvërnecit nis punën mes kontestimeve dhe alarmit mjedisor”](#) (English Translation: “Work begins on the Zvërnec luxury resort amid controversy and environmental alarm”), Reporter.al/BIRN, 7 May 2026.

⁷ [Vladimir Karaj, “Resorti luksoz i Zvërnecit nis punën mes kontestimeve dhe alarmit mjedisor”](#) (English Translation: “Work begins on the Zvërnec luxury resort amid controversy and environmental alarm”), reporting the 2 May inspection by the Vlora Protected Areas Administration and the statement attributed to an AdZM employee concerning a suspension decision.

Date / period	Record	Evidential status	Administrative significance
6 May 2026	Environmental activists documented continued heavy-vehicle activity after the reported AdZM intervention. ⁸	Media reporting relying on dated civil-society photographs.	Raises a factual question about implementation of the reported suspension; it does not by itself establish a breach of a legally effective order.
12 May 2026	IKMT stated that its field verification found fencing and preparatory access-road works on property No. 262/12, cadastral zone 1007. It stated that the works were being undertaken under Decision No. 5 of 29 April 2026, that AZHT was continuing procedures for the development-permit document, and that the developer possessed a preliminary EIA/VNM report for the wider project. ⁹	Official IKMT statement.	This is the clearest official confirmation of the activity and the administrative instruments relied upon at that date. It does not disclose the complete permit, EIA/VNM file or public-participation record.
26 May 2026	Radio Free Europe/Radio Liberty reported, citing Albania's Media and Information Agency, that during an online meeting with Commission representatives on 26 May 2026, the minister responsible for the environment stated that no final approved project existed and no project was under construction. The minister further committed that any possible development would undergo a full EIA/VNM process, conducted transparently and with public consultation. ¹⁰	Government account reproduced by Radio Free Europe/Radio Liberty.	Records the Government's characterisation of the project and its stated commitment concerning future assessment and consultation.
8 June 2026	In a written response reported by Radio Free Europe/Radio Liberty, Commission spokesperson Guillaume Mercier linked the case to Albania's Chapter 27 benchmarks. Mr Mercier stated that the Albanian Ministry had informed the Commission that construction works had been suspended and that a full EIA/VNM would be conducted for the proposed development in consultation with civil society. However, the same report recorded the Albanian Government's statement that, as of 26 May 2026, no final project had been approved and no project was under construction. ¹¹	Written Commission response reproduced by a reputable international news organisation.	The accounts create a material ambiguity as to the project's administrative stage. Due to an EIA should precede final approval, it requires a sufficiently defined development proposal. The statement therefore either implies that a concrete project now exists, or that the commitment to a full EIA remains prospective rather than an initiated procedure. The underlying screening or scoping act would be needed to resolve which.
12 June 2026	International reporting presented competing accounts: civil-society representatives described fencing, machinery and habitat disturbance, while the Government stated that the activity consisted of technical surveys and environmental measurements rather than construction. ¹²	International media reporting presenting competing accounts.	Confirms that the nature and legal basis of the activity remained disputed. The underlying administrative documents remain determinative.

⁸ [Vladimir Karaj, "Resorti luksoz i Zvërnecit nis punën mes kontestimeve dhe alarmit mjedisor"](#) (English Translation: "Work begins on the Zvërnec luxury resort amid controversy and environmental alarm") reporting continued heavy-vehicle activity documented on 6 May 2026.

⁹ [National Inspectorate for Territorial Protection \(IKMT\), "Deklaratë e IKMT"](#) (English Translation: National Inspectorate for Territorial Protection Declaration), 12 May 2026, <https://ikmt.gov.al/deklarate-e-ikmt/>.

¹⁰ [Radio Free Europe/Radio Liberty, "KE: Projekti në Zvërnec mund të ndikojë në rrugën e Shqipërisë drejt BE-së"](#), 8 June 2026, reporting the Albanian Government's account of the 26 May meeting.

¹¹ [Radio Free Europe/Radio Liberty, "KE: Projekti në Zvërnec mund të ndikojë në rrugën e Shqipërisë drejt BE-së"](#), reproducing the written response of Commission spokesperson Guillaume Mercier.

¹² [The Guardian, "The birds will fly away: can Albania's flamingo revolution keep its wetlands free from Trumps and tourists?"](#), 12 June 2026.

Date / period	Record	Evidential status	Administrative significance
17 June 2026	BirdLife Europe reported that the European Parliament had adopted its resolution on the 2025 Commission report on Albania and that the resolution called for repeal of the 2024 amendments to the protected-areas law and an immediate moratorium on new permitting procedures, construction works and development interventions within protected areas until the incompatible provisions are repealed and compliance with EU nature-protection standards is ensured. ¹³	Environmental-organisation report of parliamentary adoption; official European Parliament resolution; environmental-organisation reporting used only as supplementary explanation.	The resolution expresses a political and accession-monitoring position. It does not itself annul, suspend or revoke an Albanian permit.
13 July 2026 record-review date	No complete public file was located containing the signed Decision No. 5 and annexes, the signed act corresponding to the 30 March 2026 development-permit item, the complete preliminary EIA/VNM report and procedural file, a project-specific consultation record, or the primary suspension and follow-up enforcement documents.	Record-review finding as at the cut-off date.	These gaps limit independent verification of the sequence, conditions and continuing status of the relevant decisions and works.

4. Relevance to institutional follow-up

- a. These matters fall within ENVI's scrutiny of the Commission's Chapter 27 monitoring. ENVI Members may appropriately ask whether the Commission has received the outstanding records, how it is assessing the assurances provided by the Albanian authorities, and whether subsequent inspection, consultation and enforcement information has been supplied. Questions concerning the validity or enforcement of Albanian permits remain for the competent Albanian administrative and judicial authorities.

5. Conclusion

- a. The available record shows a succession of planning and permit-related proposals and procedures, reported site activity from 30 April 2026, official confirmation that fencing and preparatory access-road works were being undertaken under Decision No. 5, and subsequent assurances to the European Commission concerning suspension and a full EIA/VNM process.
- b. It does not provide a complete primary-document chain linking the protected-area framework, environmental assessment, public participation, planning authorisation, site activity, suspension and post-suspension enforcement. This gap remains material to further clarification and Chapter 27 monitoring.

¹³ European Parliament, [resolution of 17 June 2026 on the 2025 Commission report on Albania](#), T10-0217/2026, procedure 2025/2250(INI); see also BirdLife Europe and Central Asia, [press release of 17 June 2026](#), reporting the protected-area moratorium wording.

File 04 - Domestic Legal Framework

Environmental Assessment, Protected Areas, Planning, Strategic Investment and Public Participation under Albanian Law

Vjosa-Narta / Pishë Poro-Nartë

Purpose	This briefing note sets out the Albanian domestic-law framework relevant to projects in or affecting the Vjosa-Narta / Pishë Poro-Nartë protected landscape.
Scope	The briefing note addresses environmental assessment, protected-area law, territorial planning and development, strategic investment, access to information and public consultation.
Relationship to the submission pack	The factual chronology is addressed in File 03. EU accession and Chapter 27 implications are addressed in File 05, while source status, annex locations and outstanding documentary and spatial records are addressed in File 06 and annex.

Terminology

- **EIA/VNM** refers to Environmental Impact Assessment / *Vlerësimi i Ndikimit në Mjedis*.
- **VSM/SEA** refers to Strategic Environmental Assessment / *Vlerësimi Strategjik Mjedisor*.
- **KKT/KKTU** refers to the national territorial planning/development decision-making body as named in the applicable version of the territorial-planning framework. Where an official document uses “KKT” or “KKTU”, that terminology is preserved.
- **e-Leje** refers to the electronic permitting system/register for development and building permits.

1. Domestic legal structure: sequencing and layered legality

- The domestic-law framework is sequential and layered. For a project in or affecting a protected area, legality cannot be assessed by looking at a single administrative act in isolation. The relevant record has to show how environmental assessment, protected-area rules, planning/development approval, consultation and enforcement interact¹.
- In practical terms, the administrative record should allow the following stages to be traced where applicable: identification of the proposal; screening and environmental assessment where required; public disclosure and consultation at the relevant stage; a competent environmental decision, declaration or ministerial position as applicable; planning, development, building or KKT/KKTU authorisation where applicable; and only then works or site intervention. Where works are suspended or disputed, the further domestic questions include inspection, legal basis, sanction, damage assessment and rehabilitation and/or restoration where relevant.
- This sequencing matters because an administrative route such as KKT/KKTU approval, development permission or strategic-investment facilitation does not, by itself, resolve separate environmental-assessment, protected-area and public-participation requirements. Those layers remain distinct even when administrative procedures are accelerated or coordinated.

¹ [Law No. 10440/2011](#), “Për vlerësimin e ndikimit në mjedis” (“On Environmental Impact Assessment”); [Law No. 81/2017](#), “Për zonat e mbrojtura” (“On Protected Areas”); [Law No. 107/2014](#), “Për planifikimin dhe zhvillimin e territorit” (“On Territorial Planning and Development”); [Law No. 146/2014](#), “Për njoftimin dhe konsultimin publik” (“On Notification and Public Consultation”).

2. Domestic instruments covered

Instrument	Area	Relevance
Law No. 10440/2011	Environmental Impact Assessment / VNM	Project-level environmental assessment and environmental decision/declaration.
Law No. 91/2013; Law No. 51/2023	Strategic Environmental Assessment / VSM	Planning-level environmental assessment for plans/programmes.
Law No. 81/2017	Protected Areas	Protected-area status, management, restrictions and enforcement.
Law No. 21/2024	Amendments to Law No. 81/2017	Changes to the domestic protected-area framework.
Council of Ministers Decision No. 596 of 25 September 2024	Pishë Poro-Nartë protected-area status and zoning	Operative protected-area designation, boundaries, surface area and sub-zones; repeals Decision No. 694/2022.
Law No. 107/2014; 2025 amendment	Territorial Planning and Development	planning/development Planning, development, building permits, KKT/KKTU and e-Leje.
Law No. 55/2015, as amended through Law No. 8/2025	Strategic Investments	Strategic-investment facilitation and special administrative procedures.
Law No. 119/2014, as amended by Law No. 78/2023	Right to Information	Access to public information and transparency.
Law No. 146/2014	Notification and Public Consultation	Notification and consultation for relevant public decision-making.

3. Environmental assessment framework: EIA/VNM and VSM/SEA

- a. Albanian law distinguishes between project-level environmental assessment and planning-level strategic environmental assessment. Law No. 10440/2011 governs Environmental Impact Assessment (**EIA/VNM**) for specific projects. Law No. 91/2013 governs Strategic Environmental Assessment (**VSM/SEA**) for plans and programmes that may set the framework for future development.

For the Vjosa-Narta / Pishë Poro-Nartë context, this distinction is central. A planning-level VSM/SEA may be relevant to the wider planning background, but it does not replace project-level EIA/VNM where a specific project requires assessment². The two procedures answer different questions: VSM/SEA assesses the environmental implications of plans or programmes; EIA/VNM assesses the likely environmental impacts of a specific proposed project.

EIA/VNM should also not be reduced to the existence of a preliminary report³. The domestic EIA/VNM framework treats assessment as a sequence involving project documentation, public consultation, review by the competent authority, reasoned conclusions and integration of environmental conclusions into the development-approval process. Where works, fencing, access-road preparation or construction activity are linked to a project requiring

² [Law No. 91/2013](#), “On Strategic Environmental Assessment”, arts. 1–2; [Law No. 10440/2011](#), “On Environmental Impact Assessment”. Law No. 91/2013 applies to plans and programmes, including tourism, territorial planning, landscape protection and land use, where they set the framework for future projects subject to EIA/VNM.

³ [Law No. 10440/2011](#), “On Environmental Impact Assessment”, defining EIA/VNM as a process including the preparation of an environmental report, consultation, review by the competent authority, reasoned conclusion and integration of that conclusion into development approval

EIA/VNM, the relevant domestic-law question is whether the required assessment and environmental decision or declaration preceded approval and works.

Law No. 51/2023 amended Law No. 91/2013, including procedural rules on deficiencies in submitted documents and administrative appeal rights for interest groups and the public against the ministerial declaration or position⁴. This reinforces the procedural character of the VSM/SEA framework.

4. Protected-area framework: Law No. 81/2017, Law No. 21/2024 and Council of Ministers Decision No. 596/2024

Law No. 81/2017 provides the domestic framework for protected areas. It concerns the declaration, preservation, administration, management and sustainable use of protected areas and their natural and biological resources. In this context, protected-area status is legally material: it is not merely descriptive, but creates a framework of management, restrictions, compatibility with the protected-area regime and enforcement⁵.

Council of Ministers Decision No. 596 of 25 September 2024 is the operative protected-area designation instrument identified in the record reviewed⁶. It designates Pishë Poro–Nartë as a Category V protected aquatic and terrestrial landscape and repeals Decision No. 694/2022. For any site intervention, the legal analysis depends on matching the activity, cadastral parcel, project footprint and permit route to the protected-area boundary, sub-zone and applicable rules. Boundary maps, coordinate tables, sub-zone descriptions, management-plan material and protected-area rules are therefore part of the legal record, rather than merely background illustrations.

Law No. 21/2024 amends Law No. 81/2017 and is relevant because it changes the domestic protected-area framework, including provisions concerning tourism or economic activity in protected areas⁷. The amendment should not be treated as self-executing proof that a specific project is lawful or unlawful. Its significance is structural: it changes the framework within which protected-area development may be considered. Whether a specific project can proceed still depends on the protected-area act, zoning, EIA/VNM, planning or development approvals, public participation and enforcement record.

The EU-accession and Chapter 27 implications of Law No. 21/2024 are addressed separately in File 05.

5. Planning, development and strategic-investment framework

Law No. 107/2014 provides the domestic framework for territorial planning and development⁸. It is relevant where the project record includes planning decisions, development permits, building permits, KKT/KKTU decisions,

⁴ [Law No. 51/2023](#), “Për disa ndryshime në Ligjin nr. 91/2013, ‘Për vlerësimin strategjik mjedisor’”, arts. 2–3.

⁵ [Law No. 81/2017](#), “Për zonat e mbrojtura” (“On Protected Areas”), including provisions on the declaration, preservation, administration, management and sustainable use of protected areas, and enforcement consequences for activities carried out in breach of the protected-area regime.

⁶ [Council of Ministers Decision No. 596 of 25 September 2024](#), “On declaring Pishë Poro–Nartë a protected aquatic and terrestrial landscape (Category V),” including the protected-area status, surface area, boundaries, sub-zones and repeal of Decision No. 694/2022.

⁷ [Law No. 21/2024 amends Law No. 81/2017](#) and is relevant because it changes the domestic protected-area framework, including provisions concerning tourism or economic activity in protected areas

⁸ [Law No. 107/2014](#), “On Territorial Planning and Development”, including provisions on KKT, development permission and building permission; [Normative Act No. 8/2025 amending Law No. 107/2014](#), including amendments concerning KKTU and the electronic register for development/building permits.

preliminary declarations for works or e-Leje records. Those records are relevant to the scope, timing, authority and conditions of any planning or development authorisation.

A planning, development or KKT/KKTU decision should be read together with the EIA/VNM, protected-area and public-participation framework. Such a decision may form part of the administrative route, but it does not by itself establish that environmental assessment, protected-area compatibility or consultation requirements have been satisfied.

Law No. 55/2015, as amended through 2025, establishes special administrative procedures for investments classified as strategic. Strategic-investment status may explain an accelerated or facilitated administrative route, but it does not merge or displace separate legal requirements concerning EIA/VNM, protected-area compatibility, public participation, planning legality or enforcement⁹. Those questions remain distinct even where a project has strategic-investment status.

6. Access to information and public consultation

Law No. 119/2014, as amended in 2023, establishes the right to access information produced or held by public authorities and supports transparency and accountability. It is relevant where environmental, planning, consultation, inspection or permitting records are publicly available, required to be disclosed, or subject to access-to-information requests under the applicable legal framework.

Law No. 146/2014 regulates public notification and consultation for draft laws, strategic documents and policies of high public interest. It is relevant to legal amendments, strategic documents, and policy or planning decisions. It should be applied carefully: it is not the sole source for project-level EIA/VNM consultation, which is governed more directly by the EIA/VNM framework. It does, however, provide domestic standards for transparency, notice, access to documentation, public meetings and consideration of comments in relevant decision-making processes.¹⁰

The domestic legal framework therefore requires the project record to be assessed not only for the existence of approvals, but for the sequence and transparency of decision-making: environmental assessment, public disclosure, consultation, protected-area compatibility, planning or development approval, and enforcement action where required.

7. Crosswalk: domestic legal framework and relevance to Vjosa-Narta

The following crosswalk identifies the domestic legal layers relevant to assessing whether project approval, site intervention and enforcement were properly sequenced and documented.

⁹ [Law No. 55/2015](#), “On Strategic Investments in the Republic of Albania”, as amended through [Law No. 8/2025](#).

¹⁰ [Law No. 119/2014](#), “On the Right to Information”, as amended by [Law No. 78/2023](#); [Law No. 146/2014](#), “On Notification and Public Consultation”.

Domestic-law issue	Legal basis	Core requirement	Relevance to Vjosa-Narta
Project-level environmental assessment	Law No. 10440/2011	Where a project requires Environmental Impact Assessment (EIA/VNM), the process must include assessment, disclosure, consultation, competent-authority review and an environmental decision or declaration before the project proceeds through approval or works.	The relevant question is whether the EIA/VNM process and environmental authorisation were completed at the proper stage before project approval or site works.
Planning-level environmental assessment	Law No. 91/2013; Law No. 51/2023	Plans and programmes that set the framework for future projects must undergo Strategic Environmental Assessment (VSM/SEA) where required.	Any earlier VSM/SEA may provide relevant background, but it does not replace project-level EIA/VNM for a specific project requiring assessment.
Protected-area status and zoning	Law No. 81/2017; Council of Ministers Decision No. 596/2024	Activities in or affecting the protected landscape must be assessed against its category, legally defined boundaries, sub-zones and applicable restrictions.	The legality of any site intervention depends on the relationship between the activity, parcel, project footprint and the applicable protected-area regime.
Tourism or economic activity in protected areas	Law No. 21/2024 amending Law No. 81/2017	The amended framework changes how certain tourism and economic activities may be treated within protected areas.	Law No. 21/2024 is relevant because it changes the domestic framework under which development proposals in protected areas may be considered.
Planning, development and KKT/KKTU decisions	Law No. 107/2014; Normative Act No. 8/2025	Planning and development decisions must comply with territorial-planning rules and the wider applicable legal framework.	A KKT/KKTU or development decision may form part of the administrative route, but it does not by itself establish compliance with EIA/VNM, public-participation or protected-area requirements.
Strategic-investment route	Law No. 55/2015, as amended through Law No. 8/2025	Strategic-investment status may provide facilitated or accelerated administrative treatment.	An accelerated investment route does not displace separate requirements concerning environmental assessment, consultation, protected-area compatibility, planning legality or enforcement.

Domestic-law issue	Legal basis	Core requirement	Relevance to Vjosa-Narta
Access to information	Law No. 119/2014, as amended by Law No. 78/2023	Public authorities must provide access to public information and support transparency and accountability.	Disclosure of EIA/VNM files, permits, maps, consultation records and enforcement documents is necessary for assessing the domestic legal record.
Public notification and consultation	Law No. 146/2014; Law No. 10440/2011; Law No. 91/2013	Public participation requires notice, public announcements, access to relevant information, opportunity to comment, documented meetings and consideration of recommendations where applicable.	The relevant question is whether affected communities, civil society and the public had a meaningful opportunity to participate before relevant decisions were taken.
Inspection, suspension and restoration	Law No. 10440/2011; Law No. 81/2017; relevant inspection/construction-control framework	Where works are alleged to have proceeded without required authorisation, or where environmental damage is alleged, the relevant framework may include inspection, suspension, sanctions, damage assessment and rehabilitation or restoration.	A suspension of works does not end the domestic-law analysis. The record should also identify the legal basis for suspension and whether enforcement, damage assessment or restoration measures were required or considered.

8. Closing note

The domestic legal framework does not allow the Vjosa-Narta / Pishë Poro-Nartë issue to be assessed by reference to a single permit, preliminary report or later suspension alone. The relevant question is whether the administrative record demonstrates lawful sequencing across environmental assessment, public participation, protected-area compatibility, planning or development authorisation and enforcement where required. The project-specific application of this framework is addressed in File 03 and File 06.

9. Principal legal instruments

- Law No. 10440/2011, **“On Environmental Impact Assessment.”**
- Law No. 91/2013, **“On Strategic Environmental Assessment,”** as amended by Law No. 51/2023.
- Law No. 81/2017, **“On Protected Areas,”** as amended by Law No. 21/2024.
- Council of Ministers Decision No. 596 of 25 September 2024 concerning the designation, boundaries and zoning of the Pishë Poro–Nartë protected landscape and repealing Decision No. 694/2022.
- Law No. 107/2014, **“On Territorial Planning and Development,”** as amended, including by Normative Act No. 8/2025.
- Law No. 55/2015, **“On Strategic Investments in the Republic of Albania,”** as amended through Law No. 8/2025.
- Law No. 119/2014, **“On the Right to Information,”** as amended by Law No. 78/2023.
- Law No. 146/2014, **“On Notification and Public Consultation.”**

File 05 - EU Accession and Chapter 27

Vjosa-Narta, Chapter 27 and Albania's EU Accession Commitments

Pishë Poro-Nartë / Vjosa-Narta

Purpose	To explain why the Vjosa-Narta / Pishë Poro-Nartë case is material to Chapter 27 monitoring and to identify the implications of the available record for continued EU scrutiny.
Scope	EU accession alignment, implementation and enforcement. This note does not make a final finding on the legality of any project or administrative act under Albanian or EU law.
Relationship to the submission pack	The factual chronology is set out in File 03; the domestic legal framework in File 04. See File 06 concerning the available spatial evidence and the outstanding project-footprint record.

Terminology

- **AZHT** Territorial Development Agency / *Agjencia e Zhvillimit të Territorit*.
- **VSM/SEA** refers to Strategic Environmental Assessment / *Vlerësimi Strategjik Mjedisor*.
- **KKT/KKTU** refers to the national territorial planning/development decision-making body as named in the applicable version of the territorial-planning framework. Where an official document uses “KKT” or “KKTU”, that terminology is preserved.
- **IKMT** refers to National Inspectorate for Territorial Protection / *Inspektorati Kombëtar i Mbrojtjes së Territorit*.
- **AKZM** refers to National Agency of Protected Areas / *Agjencia Kombëtare e Zonave të Mbrojtura*.
- **IBA** refers to Important Bird Area.
- **IUCN** refers to International Union for Conservation of Nature.

1. Purpose and approach

- This note examines the relevance of the Vjosa-Narta / Pishë Poro-Nartë development record to Albania's commitments under Chapter 27: Environment and Climate Change. It focuses on the standards already identified by the European Union for environmental assessment, protected areas, public participation, inspection and enforcement.
- Albania is an EU candidate country, not a Member State. This note therefore does not suggest that EU environmental directives apply to Albania in precisely the same manner as they apply within the Union. It considers the case through the accession framework: alignment with the *acquis*, implementation in administrative practice, enforcement capacity and compliance with the benchmarks agreed in the negotiations.
- The analysis is based on official EU and Albanian records available for review. Where a primary administrative document has not been disclosed, that absence is treated as an evidential limitation and not as proof that the act does or does not exist.

2. Chapter 27 framework

- Chapter 27 requires effective implementation, adequate administrative capacity, public participation, inspection and enforcement across the environmental *acquis*¹

¹ [Council of the European Union, Common Position of the European Union, Cluster 4: Green Agenda and Sustainable Connectivity, AD 15/25, CONF-ALB 12/25](#), 12 September 2025, Chapter 27 and provisional closing benchmarks.

- b. The EU Common Position on Cluster 4 states that all new investments should already reflect national environmental legislation in line with the *acquis*, calling on Albania to strengthen inspections and enforcement, improve environmental assessment of plans and projects, and ensure effective public involvement in decisions relating to the environment²
- c. The same Common Position records specific concern that the amendments introduced through Law No. 21/2024 and the continued use of the 2015 strategic-investment framework permit extensive investment in protected areas and risk compromising ecological and biodiversity values, including potential Natura 2000 sites³
- d. The Chapter 27 nature-protection benchmark is explicit: Albania is expected to continue aligning with the EU nature *acquis*, including by repealing the incompatible provisions introduced through Law No. 21/2024 and terminating the 2015 legislation on strategic investments. It must also establish and manage a Natura 2000 network and demonstrate readiness to implement and enforce the Birds and Habitats *acquis* by accession⁴. The European Parliament's moratorium request⁵ does not alter those formal benchmarks⁶. The submitters nevertheless consider observance of it a proportionate interim safeguard pending legislative correction and verification of the relevant EIA/VNM, public-participation and permitting records.

3. Current EU assessment of implementation

- a. The Commission's 2025 Albania Report assessed Albania as having some level of preparation under Chapter 27 and making no progress during the reporting period. It recommended full alignment, implementation and enforcement of the EIA and SEA Directives, compliance of infrastructure investment with environmental and nature obligations, effective public participation, and stronger enforcement in protected areas⁷.
- b. The report identifies weak institutional capacity, poor EIA quality, recommendations that are rarely implemented or monitored, low public participation and limited enforcement. It also states that the 2024 amendments to the protected-areas law led to deterioration in nature protection and that repeated extensions of the strategic-investment legislation continue to raise concerns, particularly for protected areas⁸.
- c. The same report refers to construction of Vlora Airport within the Pishë Poro-Nartë Protected Area despite repeated Bern Convention requests for a new and sufficient EIA. The airport is a separate project, but the reference confirms that environmental governance in this protected landscape is already part of the EU's accession-monitoring record⁹.

² [Council of the European Union, EU Common Position, Cluster 4, AD 15/25, pp. 10–11](#) : all new investments should reflect national environmental legislation in line with the *acquis*; inspections and enforcement should be strengthened; and the EIA and SEA Directives should be effectively implemented with public involvement.

³ [Council of the European Union, EU Common Position, Cluster 4, AD 15/25, p. 11](#) : the amendments to the Law on Protected Areas (Law No. 21/2024) and the extension of the 2015 strategic-investment legislation raise concerns because of risks to protected areas, biodiversity and potential Natura 2000 sites.

⁴ [Council of the European Union, EU Common Position, Cluster 4, AD 15/25, p. 29](#) : the nature-protection benchmark includes repeal of the incompatible provisions introduced through Law No. 21/2024, termination of the 2015 strategic-investment legislation, preparation and management of the Natura 2000 network, and readiness to implement and enforce the EU nature *acquis* by accession.

⁵ [European Parliament, Resolution of 17 June 2026 on the 2025 Commission Report on Albania, procedure 2025/2250\(INI\)](#), calling for a moratorium on new construction works and permits in protected areas.

⁶ [Council of the European Union, Common Position of the European Union, Cluster 4: Green Agenda and Sustainable Connectivity, AD 15/25, CONF-ALB 12/25](#), 12 September 2025, pp. 25, 29–30 and 32, concerning the conditions for provisional closure of Chapter 27, repeal of the incompatible provisions introduced through Law No. 21/2024, termination of the 2015 legislation on strategic investments, implementation and enforcement of the nature-protection *acquis*, and continued monitoring throughout the negotiations.

⁷ [European Commission, Albania 2025 Report, SWD\(2025\) 750 final, 4 November 2025, p. 15](#), Chapter 27 recommendations.

⁸ [European Commission, Albania 2025 Report, SWD\(2025\) 750 final, pp. 76–77](#) : the Commission records weak environmental-planning capacity, poor EIA quality, low public participation, limited enforcement, deterioration in nature protection following the 2024 amendments, and continuing concerns linked to the strategic-investment legislation.

⁹ [European Commission, Albania 2025 Report, SWD\(2025\) 750 final, p. 77](#) : the Commission records that construction of Vlora Airport within the Pishë Poro-Nartë Protected Area was advancing despite Bern Convention requests to suspend works pending a new and sufficient EIA procedure.

4. Relevance of Vjosa-Narta / Pishë Poro-Nartë

- a. Pishë Poro-Nartë is designated as a Protected Landscape, IUCN Category V, and is part of the Emerald Network and an Important Bird Area. Official information records 192 bird species and 18 habitat types corresponding to the Natura 2000 habitat list, six of them priority habitat types. These designations and ecological features make the site directly relevant to Albania's preparation for the EU nature-protection acquis¹⁰.
- b. Official KKT/KKTU agendas show that proposals associated with “Zvërnec South Adriatic Development” sh.p.k. appeared on successive meeting agendas: a resort-development proposal in April 2025; a wider multifunctional-development proposal in March 2026; and an infrastructure-permit proposal concerning fencing and preparatory access-road works on 29 April 2026¹¹.
- c. In its statement of 12 May 2026, the National Inspectorate for Territorial Protection (IKMT) stated that fencing and preparatory access-road works were being carried out on the basis of Decision No. 5 of 29 April 2026, that the developer held a preliminary EIA/VNM report for the wider project, and that AZHT procedures concerning the development-permit document were continuing¹².
- d. The public record reviewed for this submission did not contain the complete signed text and annexes of Decision No. 5, the complete EIA/VNM application, the environmental decision or a project-specific public-consultation file. Nor did it provide a complete primary-document chain establishing the later status of the infrastructure decision or any suspension, revision, revocation, enforcement or restoration measures.
- e. These gaps do not, by themselves, establish that the project is lawful or unlawful. They do, however, prevent independent verification of whether the relevant environmental-assessment, public-participation, protected-area, planning and enforcement safeguards were implemented consistently with Albania's Chapter 27 commitments.

5. Chapter 27 crosswalk

The following table identifies the accession issues engaged by the available record.

Chapter 27 issue	EU position or benchmark	Relevance to Vjosa-Narta
EIA/VNM and VSM/SEA	Effective alignment and implementation; inclusive assessment before approval of projects, plans and programmes.	The sequence between environmental assessment, development authorisation and site works requires documentary clarification.
Public participation and information	Effective public involvement, access to environmental information and the ability of civil society to challenge plans and projects.	The complete consultation notice, hearing record, comments and authority responses have not been located in the public record reviewed.
Protected areas and nature acquis	Alignment with the Birds and Habitats Directives; protection and management of proposed Natura 2000 sites.	The project concerns a protected landscape with Emerald, IBA and Natura 2000 habitat significance.
Law No. 21/2024	Repeal of the incompatible provisions introduced through the 2024 amendments to the protected-areas law.	The project is relevant to the accession benchmark requiring repeal of the incompatible provisions introduced through Law No. 21/2024. A domestic permit route does not, by itself, resolve that accession question.

¹⁰ Council of Ministers, [Decision No. 596 of 25 September 2024](#), concerning the legal designation, surface area, boundaries and zoning of Pishë Poro–Nartë; National Agency of Protected Areas, [“Peizazhi i Mbrojtur ‘Pishë Poro–Nartë’”](#), official information concerning its Emerald Network and Important Bird Area status, species and habitat types corresponding to the Natura 2000 habitat list.

¹¹ KKT/KKTU agendas: 18 April 2025, item 12; [30 March 2026, item 41](#); and [29 April 2026, item 5](#). The agenda entries identify “Zvërnec South Adriatic Development” sh.p.k. and the relevant resort, multifunctional-development and infrastructure-permit proposals.

¹² [National Inspectorate for Territorial Protection \(IKMT\), “Deklaratë e IKMT”, 12 May 2026, https://ikmt.gov.al/deklarate-e-ikmt/](#).

Chapter 27 issue	EU position or benchmark	Relevance to Vjosa-Narta
Strategic-investment framework	Termination of the 2015 strategic-investment legislation is included in the nature-protection benchmark.	If a strategic-investment or facilitated administrative route was relied upon, that route should be clearly documented, it would not replace the separate environmental-assessment and protected-area requirements relevant to Chapter 27.
Inspection, enforcement and restoration	Stronger inspection and enforcement capacity, including action against environmental crime and effective implementation in protected areas.	The administrative record should identify the legal basis for any suspension or review, the relevant inspection findings and any sanctions, damage assessment or restoration measures required or considered.

6. Implications for Chapter 27 monitoring

- a. The available record supports continued scrutiny of the Vjosa–Narta / Pishë Poro–Nartë case under Chapter 27. Clarification is required regarding the completeness of the EIA/VNM and public-participation record, the status of the relevant planning and infrastructure decisions, the treatment of these matters in the Commission’s assessment of Albania’s Chapter 27 commitments, and any subsequent enforcement or restoration measures reported by the Albanian authorities. The European Parliament’s June 2026 position on halting new construction works and permits in protected areas is also relevant to the application of these benchmarks in Vjosa–Narta¹³.
- b. The specific questions proposed for parliamentary follow-up are set out in **File 07: Suggested Questions for ENVI Members to Put to the European Commission**.

7. Conclusion

- a. In light of the EU’s existing findings and the incomplete public administrative record, the submitters respectfully invite ENVI members to seek written clarification from the European Commission on the questions set out in File 07. These questions reproduce the requests contained in File 02, section 6.
- b. Vjosa-Narta / Pishë Poro-Nartë is material to Chapter 27 because the available record engages environmental assessment, public participation, protected-area safeguards, strategic-investment governance and enforcement - the same areas in which the EU has already identified shortcomings and set specific benchmarks for Albania.
- c. Continued Commission scrutiny would help distinguish formal accession commitments from implementation in practice, clarify the outstanding administrative record and ensure that progress under Chapter 27 is assessed against transparent and enforceable environmental standards.

¹³ European Parliament, [resolution of 17 June 2026 on the 2025 Commission report on Albania](#), T10-0217/2026, procedure 2025/2250(INI).

File 06 - Evidence Status and Annex Index

Documentary basis, annex location and outstanding primary records

Vjosa-Narta / Pishë Poro-Nartë | Record reviewed through 13 July 2026

Purpose and evidential approach. This file provides a concise index to the evidence underpinning Files 03–05 and the annexes supplied. It distinguishes signed or officially published acts from agendas, institutional statements, correspondence reproduced by media and secondary reporting. Attributed statements are recorded as such and are not treated as independent verification. This file does not determine the legality, validity or legal effect of any project or administrative act.

1. Key evidence position

Issue	Evidence status	Position supported by the record
Protected-area designation	Officially verified; project-specific scope limited	Official ecological background. Decision No. 596/2024 is the operative designation identified in the record reviewed and is relied upon here for the protected-area status, map and coordinates. It does not establish the project footprint or permit status.
January-March 2025 residential-block procedure	Documented in reproduced AZHT correspondence	A written response attributed to AZHT and reproduced by Faktoje states that Decision No. 39 was conditionally approved, the application was withdrawn on 27 March 2025 and the decision is no longer in force.
2024-2026 resort and infrastructure proposals	Agendas verified; underlying decisions not located	Official agendas were located. The corresponding signed project decisions, plans, conditions and annexes were not located in the material reviewed.
Preliminary EIA/VNM report	Existence stated by IKMT; file not located	IKMT stated that the developer possessed a preliminary report. The report, application and procedural file were not located in the material reviewed.
Project-specific consultation	Complete record not located	No complete project-specific notice, hearing record, comments, objections or authority responses were located.
Suspension and current works status	Reported; underlying Albanian act not located	BIRN reported a suspension, and RFE/RL reproduced the Commission spokesperson's statement that the Albanian ministry had informed the Commission that works were suspended. No underlying Albanian suspension order, operative terms or complete later permit and enforcement record was located.
Project footprint and parcel overlap	Incomplete spatial record	IKMT identified property No. 262/12, cadastral zone 1007. A verified project-footprint and sub-zone overlap record was not located.

2. Project-specific evidence and annex index

Record	Evidential status	Relevance and limitation	Access
Decision No. 596 of 25 September 2024	Primary official act	Operative Category V designation identified in the reviewed record, including area, protection rules, map, coordinates and repeal of Decision No. 694/2022. It does not establish the project footprint or permit status.	Annex F03-A1
KKT agenda, 25 September 2024, item 19	Official agenda	Records that a development-permit proposal for a tourist resort in Zvërnec was listed. The corresponding signed decision was not located.	Annex F03-A2
KKTU agenda, 28 January 2025, item 39	Official agenda	Records a construction-permit proposal for residential blocks F1V2, F1V3 and F1R6. Read with the AZHT response below.	Annex F03-A3
Faktoje, "E vërteta e lejes së ndërtimit për projektin në Zvërnec", 16 June 2026	Correspondence attributed to AZHT and reproduced by Faktoje.al media	Publishes a written response attributed to AZHT stating that Decision No. 39 was conditionally approved, the application was withdrawn on 27 March 2025 and the decision is no longer in force.	Annex F03-A4
KKTU agenda, 18 April 2025, item 12	Official agenda	Records a development-permit proposal for a tourist resort in Zvërnec. The signed decision and annexes were not located.	Annex F03-A5

Record	Evidential status	Relevance and limitation	Access
KKTU agenda, 30 March 2026, item 41	Official agenda	Records a development-permit proposal for a multifunctional complex including residential, hospitality, recreation and marina uses. The signed decision, plans and conditions were not located.	Annex F03-A6
KKTU agenda, 29 April 2026, item 5	Official agenda	Records an infrastructure building-permit proposal for fencing and preparatory access-road works. The signed Decision No. 5 and annexes were not located.	Annex F03-A7
IKMT, “Deklaratë e IKMT”, 12 May 2026	Official institutional statement	States that field verification found fencing and access-road works on property No. 262/12, cadastral zone 1007; identifies Decision No. 5; and states that a preliminary EIA/VNM report existed. The underlying decision, permit and EIA file were not disclosed by the statement and were not located in the material reviewed.	Annex F03-A8
Vladimir Karaj, “Resorti luksoz i Zvërnecit nis punën mes kontestimeve dhe alarmit mjedisor”, Reporter/BIRN, 7 May 2026	Secondary reporting	Reports physical activity, the 2 May AdZM inspection, a reported suspension and continued activity on 6 May, supported by photographs and interviews. The underlying inspection and suspension acts were not located.	Hyperlink; not annexed
Radio Free Europe/Radio Liberty, “KE: Projekti në Zvërnec mund të ndikojë në rrugën e Shqipërisë drejt BE-së”, 8 June 2026	Institutional statements reproduced by media	Reports the Government’s 26 May account and reproduces the Commission spokesperson’s response concerning suspension, a full EIA/VNM and Chapter 27. It is not a substitute for the underlying Albanian acts.	Hyperlink; not annexed

3. Principal linked authorities and planning record (set out in File 04 and the Chapter 27 analysis in File 05)

Authority or record	Relevance
Law No. 10440/2011, “On Environmental Impact Assessment” and Law No. 91/2013, “On Strategic Environmental Assessment” , as amended by Law No. 51/2023	Project-level EIA/VNM and planning-level VSM/SEA procedures, including consultation, competent-authority review and environmental decisions.
Law No. 81/2017, “On Protected Areas” and Law No. 21/2024	Domestic protected-area framework and the 2024 amendments addressed in Files 04 and 05.
Law No. 107/2014, “On Territorial Planning and Development”	Territorial planning, development and building-permit framework, including the KKT/KKTU and e-Leje routes.
EU Common Position – Cluster 4, AD 15/25, 12 September 2025	Chapter 27 requirements and provisional closing benchmarks concerning EIA/SEA, participation, enforcement, protected areas, strategic investment and Natura 2000 readiness.
European Commission, Albania 2025 Report, SWD(2025) 750 final, 4 November 2025	Commission assessment of Chapter 27 preparedness, EIA/SEA implementation, participation, enforcement and protected-area governance.
European Parliament resolution of 17 June 2026, T10-0217/2026, procedure 2025/2250(INI)	Parliament’s adopted accession-monitoring position, including protected-area concerns.
AKZM, “Peizazhi i Mbrojtur Pishë Poro–Nartë”	Official ecological background. Decision No. 596/2024 remains the designation authority relied upon for current legal status and boundaries.
Ministry of Tourism and Environment, Environmental Declaration for the PDZRK “Vjosë-Nartë” (supplied copy)	Planning-level VSM/SEA record. It expressly states that individual projects remain subject to project-level EIA/VNM, environmental-permit requirements and other applicable legal procedures. Reproduced as Annex F06-B1; it is not the project-specific EIA/VNM for the 2026 proposal.

Verification note

This register reflects the publicly accessible and supplied material reviewed through 13 July 2026. If a signed decision, EIA/VNM file, consultation record, permit, enforcement act or verified spatial record is subsequently obtained, it should supersede any provisional account based on an agenda, institutional statement or secondary report.

File 07 - Suggested Questions for ENVI Follow-up

Vjosa-Narta / Pishë Poro-Nartë and Albania's Chapter 27 commitments

ENVI members are invited by Albanian civil society actors to request written clarification from the Commission on the following points:

- 1 Has the Commission received the complete project-level EIA/VNM file for developments affecting the Vjosa-Narta / Pishë Poro-Nartë / Zvërnec area, including applications, scoping decisions, environmental reports, environmental declarations or decisions, and any preliminary decisions?
- 2 Has the public consultation record been disclosed, including notices, minutes, participants, objections, official responses, and evidence of participation by local communities and environmental civil society organisations?
- 3 Have the Albanian authorities disclosed all development permits, building permits, KKT/KKTU decisions, environmental permits, protected-area maps, zoning documents and project-footprint documents relevant to the affected protected area?
- 4 What timetable and legal pathway has Albania provided for repealing the incompatible provisions introduced through Law No. 21/2024 and terminating the 2015 legislation on strategic investments?
- 5 What interim safeguards apply pending repeal or correction, and does the Commission consider that any permitting, strategic-investment approval, construction work or other development intervention in protected areas may proceed where it relies on provisions identified as incompatible with EU nature-protection standards?
- 6 Will the Commission ask Albania to ensure a moratorium on new permitting procedures, construction works and development interventions in protected areas until compliance with EU nature-protection standards has been verified?
- 7 Will the Commission request, facilitate or support an independent third-party technical review of the EIA/VNM process, project impacts, public-consultation record and compliance with EU environmental and nature-protection standards?
- 8 Will Vjosa–Narta remain subject to explicit Chapter 27 monitoring, including in relation to the EIA and SEA Directives, Aarhus standards, the Bern Convention, the Birds and Habitats Directives, potential Natura 2000 obligations and protected-area enforcement?

Supporting record: File 02, section 6; File 03 - Legal and Administrative Chronology; File 04 - Domestic Legal Framework; File 05 - EU Accession and Chapter 27; File 06 - Evidence Status and Annex Index; and Annexes F03-A1–F03-A8 and F06-B1, as indexed in File 06.