



BIODIVERSITY CONSERVATION WITHIN THE GREEN AGENDA FOR THE WESTERN BALKANS REPORT

Assessing National Policies in Albania

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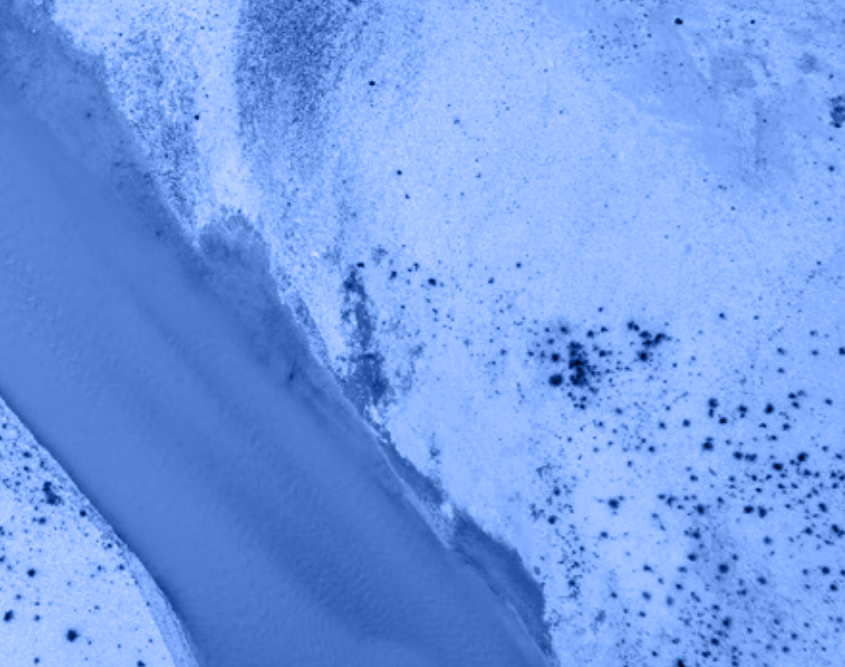
Assessing National Policies in Albania



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Janos Hunyadi Street, Building 32, Ap. 11, Tirana 1019
Phone: +355 4 562 8954
Web: www.ppnea.org

Author:

Haxhire Vezi
Klaudja Koçi
Xhemal Xherri
Zydjon Vorpsi
Aleksandër Trajçe

Editor:

Lorena Pyze Xhafaj

Design:

Liaison Design - Ermal Shenaj

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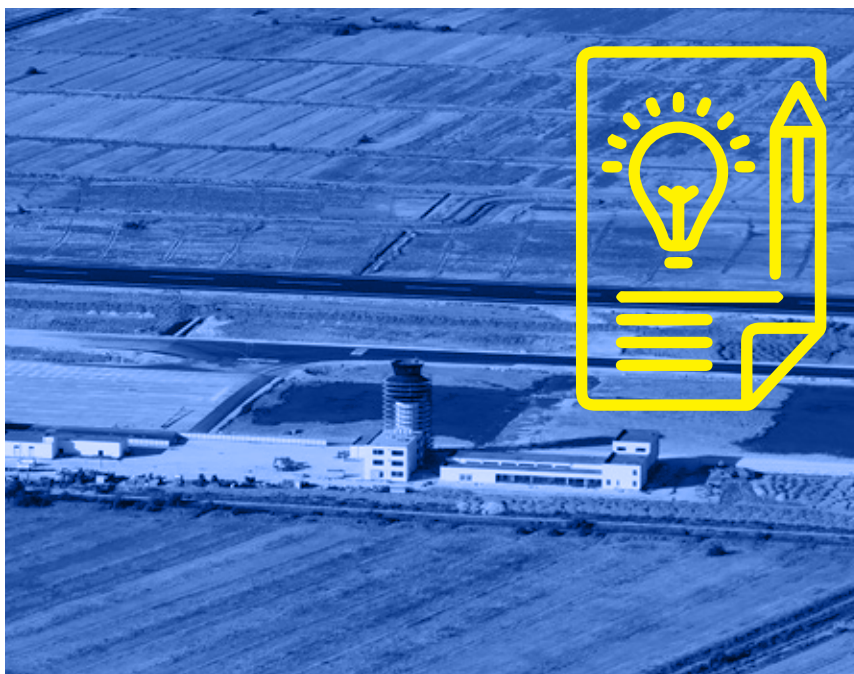
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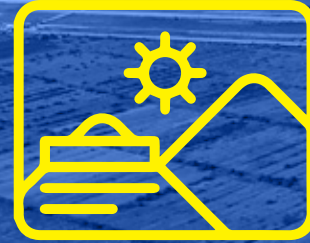
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ABBREVIATIONS

AEWA - Conservation of African-Eurasian Migratory Waterbirds
ASCIs - Areas of Special Conservation Interest
CBD - Convention on Biological Diversity
CELEX - Communitatis Europeae Lex
CSO - Civil Society Organization
CMS - Convention on the Conservation of Migratory Species of Wild Animals
EU - European Union
EEC - European Economic Community
EIA - Environmental Impact Assessment
GAWB - Green Agenda for the Western Balkans
GFA - GFA Consulting Group
GWP - Global Water Partnership
IBAs - Bird Areas
IKB - Illegal Killing of Birds
IUCN - The International Union for Conservation of Nature
JICA - Japan International Cooperation Agency
KfW - KfW Development Bank (Kreditanstalt für Wiederaufbau)
MoE - Ministry of Environment
NAPA - National Agency for Protected Areas
NEA - National Environmental Agency
NFC - National Fauna Council
NPISAA - National Programme for the Implementation of the Stabilisation and Association Agreement.
NGO - Non Profit Organization
PPNEA - Protection and Preservation of Natural Environment in Albania
PONT - Prespa Ohrid Nature Trust Fund
PM - Mountain Package
RAPA - Regional Administrations of Protected Areas
SEA - Strategic Environmental Assessment
WB6 - Western Balkans Six



1. BACKGROUND



The Green Agenda for the Western Balkans represents a strategic commitment to align the region's environmental and climate policies with those of the European Union. It serves as a key roadmap for integrating sustainability into national development, while supporting the broader EU accession process. For Albania, the Green Agenda is both an opportunity and a responsibility, offering a path to address environmental degradation, enhance biodiversity protection, and implement crucial reforms in line with EU standards. By linking ecological goals with political and economic instruments, the Agenda strengthens cooperation between the Western Balkans and the EU, guiding national policies toward a greener, more resilient future.

The GAWB, as a pathway document for the region's transition to green and circular economies, sets out five pillars: decarbonization, depollution, circular economy, sustainable agriculture, and the protection of nature and biodiversity. While the previous 2021 Action Plan¹ included 58 actions under these pillars, it has since been superseded by the newly endorsed plan, which now outlines 41 actions to be undertaken by the respective governments as well as regional and international institutions. Given the regional nature of GAWB, the Commission Staff Working Document: Guidelines for the Implementation of the Green Agenda for the Western Balkans has appointed the Regional Cooperation Council (RCC), a regionally owned and led framework for cooperation in South East Europe (SEE), as a facilitating body for regional cooperation and implementation of the GAWB, providing technical and analytical support for the WB6 governments.

The 2021 GAWB action plan has proven hard to track in terms of implementation, as witnessed in the first RCC implementation report,² covering the year 2022. This report was followed by another implementation report covering the year 2023,³ while the report covering 2024 was published in the end of October 2025⁴. In 2024 the initial revision of the GAWB action plan was envisaged, and the Revised Green Agenda Action Plan (2025–2030)⁵ was published. This situation was countered in October 2024 by a group of organizations from all WB6 countries led by Bankwatch Network, by publishing a joint NGO proposal for the revision of the GAWB Action Plan,⁶ outlining the need to reduce the number of actions in the revision of the Action Plan, the need to produce detailed national level GAWB plans, the need to meaningfully include civil society in the consultation process and more.

In this report, we will track the current implementation of three specific actions within the biodiversity pillar of the GAWB Action Plan in Albania, using as a basis for analysis the joint NGO proposals on the GAWB Action Plan.⁷ A desk-research approach and documentation analysis will be carried out, drawing on policy documents produced within the three selected actions. In addition to the formal documentation, the analysis will also integrate PPNEA's extensive field experience, which provides essential insights beyond what is captured in written sources. Where relevant, PPNEA's practical engagement and specific cases from its work will

be referenced to substantiate and contextualize the findings. Given the difficulties in tracking the implementation of all of the actions distributed among five different pillars, the analysis will follow a thematic approach, focusing on the area of expertise of PPNEA:



- Complete the transposition and implementation of the EU Birds and Habitats Directives;⁸
- Declare new protected areas in line with the 2030 CBD targets, 2030 Bern Convention Strategy and Emerald Network timeline proposed in 2024;⁹
- Legally protect and manage areas of importance for ecosystem connectivity.¹⁰

It’s important to note that, the complete transposition and implementation of the EU Birds and Habitats Directives, and the declaration of new protected areas aligned with the 2030 CBD targets, Bern Convention Strategy, and Emerald Network timeline were both proposed by a group of NGOs and are key for the EU accession process, but do not appear as specific actions in the Action Plans. In addition, it will cover the legal protection and management of areas important for ecosystem connectivity, proposed as a modification of the original action on the development of green infrastructures and ecosystem connectivity (58. Development of Green Infrastructures and ecosystem connectivity). PPNEA’s practical experience and specific field cases will be used to contextualize and enrich the analysis.

By critically evaluating these actions, the study seeks to inform policy adjustments and strengthen the evidence base for environmental governance reforms in Albania. In order to evaluate the alignment of national policies in Albania with the GAWB, the following research questions will guide the process of analysis:

1. What are the key achievements in the implementation of GAWB within specific thematic areas across the economies of the Western Balkans to date?
2. What are the existing gaps, obstacles, and challenges in the implementation of GAWB within specific thematic areas across the economies of the Western Balkans?

The analysis will take into consideration the timeframe from the commencement of the GAWB in Albania up to November 2025. The following dimensions will be assessed and where possible, the key achievements and key gaps, obstacles and challenges would be identified:

- | | |
|--|----------------------------|
| 1. Strategic and legislative frameworks; | 3. Stakeholder engagement; |
| 2. Institutional structures and administrative capacities; | 4. Financing; |
| | 5. Other relevant aspects. |

The present report is developed within the framework of the project “Green Agenda Navigator-Empowering civil society to support development of climate neutral, resilient, resource-efficient, and competitive economies in the Western Balkans,” funded by the European Union. The project aims to contribute to inclusive democratization and participatory implementation of reforms in the EU accession process of the Western Balkans through enhancing cooperation, understanding, and the impact of civil society organizations on the implementation of the GAWB across the WB6 countries. The project focuses on improving the environment for transparent and participatory decision-making, as well as empowering citizens and civil society to advocate for a clean environment, responsible public authorities, and to engage in decision-making processes at the regional, national, and local levels.



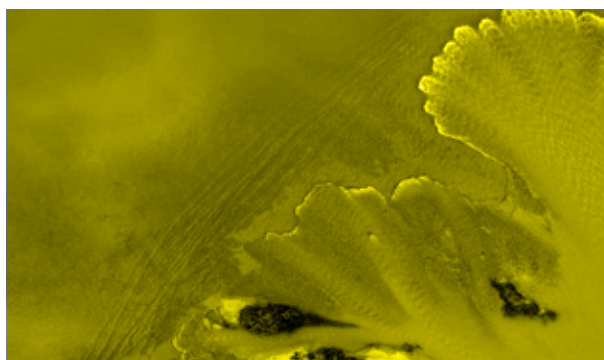
2. METHODOLOGY

The analysis primarily relies on a desk-based review of documents and policy analysis. A wide range of materials has been examined, including national legislation, official strategies, ministerial decisions, progress reports, EU reports (2020–2025), and specialized publications from both national and international civil society organizations. Particular attention has been paid to the outputs of PPNEA and its partner networks, such as the EU4Nature and Green Agenda Navigator initiatives, which have provided valuable first-hand insights into ongoing policy implementation and field-level realities.

The analysis focuses on three actions identified as priorities within the NGO Joint Proposals on the GAWB Action Plan. In the NGO proposals, green infrastructure was moved to Action 4 on climate adaptation, to reflect its broader scope, while ecosystem connectivity retained a focus on concrete protection measures.

For each of these three actions, the analysis assesses five key indicators, which help to understand the main achievements, challenges, and gaps in the implementation process. Analytical attention is given to the following dimensions:

- The strategic and legislative framework guiding the action at the national level;
- The institutional and administrative structures in place for implementation;
- The integration of biodiversity priorities into other sectors.



The research process covered the period from the adoption of the Green Agenda in 2020 until November 2025. During this time, the research team continuously updated the evidence base as new policy documents, government decisions, and reports became available. A critical comparison was then made between Albania's current framework and the commitments outlined in EU and regional policy instruments, in order to identify progress, persistent gaps, and areas where corrective action is most urgent.

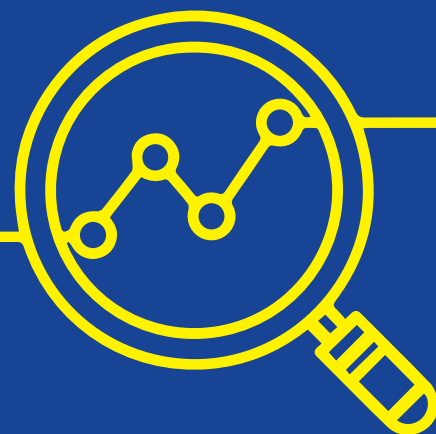






Photo Copyright Vladimir Mladenov
Flamingos, *Phoenicopterus roseus* breeding in Vjosa - Narta Protected Area

Civil Society Participation in Decision-Making

In line with the objectives of the Green Agenda Navigator project, the analysis also incorporates an assessment of the role and participation of civil society organizations (CSOs) in the formulation, implementation, and monitoring of GAWB-related actions in Albania. CSOs engagement is examined through several dimensions, including the accessibility and openness of consultation processes, the extent to which CSOs recommendations are integrated into official strategic or legislative documents, and the existence of institutional mechanisms, such as inter-institutional working groups, advisory bodies, or thematic councils, that facilitate structured involvement. PPNEA's field experience provides valuable insights into the evolving participatory landscape. In recent years, certain positive developments have been observed, such as more frequent invitations to technical consultations and the gradual recognition of CSOs as relevant contributors in biodiversity and environmental policy discussions. However, significant challenges persist. These include inconsistencies in the application of participatory procedures across ministries, limited transparency in the preparation of policy documents, short and insufficient consultation timelines, and weak feedback mechanisms regarding the incorporation or rejection of civil society input. Furthermore, engagement at the local government level remains uneven, despite the critical role of municipalities in implementing biodiversity and land-use policies. These gaps underline the need for more systematic, institutionalized, and meaningful participation of civil society actors in environmental governance processes.

Financial Dimension

The report presents a brief overview of nature-related financing in Albania allocated from the state in the section 2.1.2.¹¹ Available data indicate that state budget allocations for environmental protection and biodiversity are limited, with a modest share dedicated to the management and functioning of protected areas, including support to the National Agency of Protected Areas (NAPA). External funding from EU pre-accession instruments, donors, and international NGOs plays an important complementary role. However, overall financial constraints continue to challenge the effective implementation of biodiversity actions, including monitoring, enforcement, and ecosystem connectivity initiatives.

2.1 COMPLETE THE TRANSPOSITION AND IMPLEMENTATION OF THE EU BIRDS AND HABITATS DIRECTIVES

Regarding this point, it should be noted that, the full transposition and implementation of the EU Birds Directive (Directive 2009/147/EC) and the Habitats Directive (Directive 92/43/EEC) are critical milestones for Albania's EU accession process and its commitment to the GAWB and the present narrative assesses Albania's progress in this regard. A clear answer to the topic in question is that these Directives have not yet been fully transposed into Albanian legislation. However, Albania, as an EU candidate country, is in the process of aligning its national legislation with the EU *acquis Communautaire*, including these two directives.

2.1.1 ANALYSIS OF TRANSPOSITION AND IMPLEMENTATION

Albanian legislation on nature protection, especially with the signing of the Stabilisation and Association Agreement (SAA) and in the implementation of the National Plan for Implementation of the SAA (NPISAA), has been aligned to a considerable extent with the main EU directives on nature protection: the Birds Directive (codified version 2009/147/EC) and the Habitats Directive (92/43/EC) have been partially transposed respectively to the extent of 75-85% of their provisions. In particular, the law "*On the protection of biodiversity*" and the law "*On the protection of wild fauna*", include the provisions on the protection of species transposed from the two basic nature protection directives. These, together with the amended law "*On protected areas*", contain provisions from the two basic directives, regarding the protection of habitats inside and outside protected areas. Therefore, this legislation also supports the good management of protected areas.^{12s}

As stated in the amended law, the Law No. 81/2017 “*On Protected Areas*” updated with Law No. 21/2024 “*On some additions and amendments to Law No. 81/2017 “On Protected Areas”*” it’s important to emphasize that has been partially aligned with Habitat Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, as amended, CELEX number 31992L0043, Official Journal of the European Union, Series L, No. 206, dated 22.7.1992, pages 7-50. Law No. 68/2014 integrates aspects of Article 4 of the Birds Directive (special protection for endangered migratory species) and Articles 6 and 17 of the Habitats Directive, addressing habitat conservation and reporting duties.

The recent amendments to the Law “On Protected Areas” (No. 21/2024), have raised serious concerns about facilitating construction and investment within protected territories. These amendments, together with the lack of sustainable biodiversity monitoring, where a Biodiversity Strategy is currently lacking in our country, punitive measures for illegal logging are not implemented, and above all the new hunting law has still not been approved, show that the formal transposition of the legislation has not been accompanied by effective implementation on the ground.



Although the EU progress reports repeatedly describe Albania’s *formal alignment* with the EU nature protection acquis, particularly the Habitats and Birds Directives as “advanced,” this refers mainly to the legal and technical transposition of EU rules. However, the narrative across the reports also highlights a deterioration in practical implementation, especially due to legislative changes and investment decisions affecting protected areas. In other words, while Albania has made steady progress in aligning its legislation with EU standards, the *effective enforcement* of these rules has weakened over time. This is particularly evident in the later reports (2024–2025), which express growing concern over amendments to strategic investment laws and the authorization of major tourism projects inside protected landscapes. Therefore, the reports are not contradictory: they distinguish between legal alignment, which remains high, and actual protection on the ground, which has regressed due to policy decisions and insufficient enforcement:

Report years	Progress referred:
Albania 2020 Report	Alignment with the acquis in the field of nature protection, in particular the Habitats and Birds Directives, is well advanced, but policy and law enforcement remain generally weak despite numerous capacity building activities and technical assistance. ¹³
Albania 2021 Report	Alignment with the acquis in the field of nature protection, in particular the Habitats and Birds Directives, is advanced. Policy and law enforcement remain generally weak despite numerous capacity building activities and technical assistance. The legislation on strategic investment raises concerns for the protection of biodiversity, as it may allow large tourism and industrial investments in protected areas. ¹⁴
Albania 2022 Report	Alignment with the acquis in the field of nature protection, in particular the Habitats and Birds Directives, is advanced. The legislation on strategic investment raises concerns for the protection of biodiversity, as it may lead to large tourism and industrial investments in protected areas. ¹⁵
Albania 2023 Report	Alignment with the EU acquis on nature protection, in particular the Habitats and Birds Directives, is advanced. The legislation on strategic investment raises concerns for the protection of biodiversity, as it may lead to extensive tourism and industrial investment in protected areas. ¹⁶
Albania 2024 Report	Alignment with the EU acquis on nature protection, in particular the habitats and birds Directives, is advanced. However, recent legislative developments have raised concerns. In March 2024, the extension of the 2015 legislation on strategic investments by a year has sparked worry about potential biodiversity threats. ¹⁷
Albania 2025 Report	Alignment with the EU acquis on nature protection, in particular the habitats and birds Directives, needs further improvement. The 2024 legislative amendments to the Law on protected areas led to deterioration on nature protection. Works for the first large touristic resort in the Buna-Velipoja Protected Landscape, which is in the list of the potential Natura 2000 sites in Albania started amid protests by the local population. ¹⁸

Table 2
EU Report status from 2020-2025

With the Law No. 8, date 31.01.2025 ON SOME ADDITIONS AND AMENDMENTS TO LAW NO. 55/2015, “ON STRATEGIC INVESTMENTS IN THE REPUBLIC OF ALBANIA”, AS AMENDED, the Albanian Government approved the extension of the 2015 legislation on strategic investments by a year led to extensive tourism and industrial investment in protected areas. In addition, the amendments to the Law on Protected Areas, now permits activities like water extraction for irrigation and construction of touristic resorts within these areas.

One of the most problematic laws, which should serve as a full protector of habitats and birds, is the Law “*On Protected Areas*”, which unfortunately in Albania is not the case. The EU Commission, international entities and CSOs in Albania have repeatedly raised concerns and given several recommendations in this regard^{19 20 21}. Adding here, the IUCN approved Motion 130 with over 98% of the vote, which reaffirms that Protected Areas must be protected from unsustainable tourism infrastructure and calls for the harmonization of national legislation with global conservation guidelines. The Motion directly addresses the amendments to Law No. 21/2024 in Albania, calling for the restoration of protection of IUCN Categories I & II, especially in the face of threats such as the airport and large tourist complexes in Vjosa–Narta. Initiated by PPNEA and supported by 14 international organizations, Motion 130 represents a significant global moment that emphasizes that economic development cannot justify the damage to protected ecosystems.²²

The construction of the new Vlorë Airport within the Pishe Poro-Narta Protected Area, started in December 2021 continues, despite the request of the Standing Committee of the Bern Convention in December 2023 to suspend the works until a new and sufficient EIA procedure is conducted.²³ In the meantime, the implementation of these amendments risks violating the *EU Directives*. Albania has ignored the *Recommendation 219* of the Bern Convention and the similar recommendations of AEWA and Convention of Migratory Species concerning the construction of Vlorë International Airport inside the Candidate Emerald Site.²⁴

Law No. 81/2017 “On Protected Areas” has a list of additional activities that can be implemented inside the Protected Area, stated in the article 33, titled



“*Economic activities in protected areas*”.

1) activities developed in agritourism accommodation structures and any other supporting activity/infrastructure

2) renewable energy installation - This paves the way for industrial parks to be built inside the Delta of Vjosa or other protected areas, in the Candidate Emerald Site.

3) establishment of fish farms, after having been provided with the necessary permits

4) activities such as construction, sewage treatment in farms, construction of canals, highways, urban areas, as well as activities similar to these, in cases where the subject is provided with a permit by the National Council of the Territory. As the tendency is to invite as many investors as possible and transform the area with the construction of the airport, there is a high risk that all these activities will take place in the near future. The construction of urban areas, followed by other activities go in line with the interest shown by Affinity Partners to build 10,000 rooms inside the Pishe-Poro-Narte Protected Landscape, which is also a Candidate Emerald Site.

5) military activities, which can be exercised after written approval/equipment with an environmental permit.

BirdLife International has identified 16 important Bird Areas (IBAs) within Albania.²⁵ These areas are officially acknowledged by the Albanian government and have been incorporated into the country's legal framework as "*Protected Areas of International Importance*", as defined in Law No. 81/2017 on Protected Areas. Through a collaborative, science-based process, the Critical Ecosystem Partnership Fund (CEPF), which represents a major international initiative for biodiversity conservation, has pinpointed 29 Key Biodiversity Areas (KBAs) across Albania.

Albania has also proposed a Candidate Emerald Network of 25 sites, approved in December 2012 under the Bern Convention. These sites, classified as Areas of Special Conservation Interest (ASCI), serve as a counterpart to the EU Natura 2000 network, aiming to preserve species and habitats of European importance in non-EU countries. They have not finalized the process of proclaiming them Emerald sites after being designated officially as Candidate Emerald Sites. At present, these sites remain classified as Candidate Emerald Sites, meaning that they have been proposed and assessed but are not yet officially adopted with the corresponding full legal protection obligations. The law refers to emerald network zones, without distinguishing candidate status. This creates some confusion, although we have interpreted the law as inclusive to the candidate sites as there is no difference in the convention rules about candidate emerald sites and emerald sites.

Since the Vjosa River basin contains several sites proposed for inclusion in the Emerald Network, it is important to note that, at the meeting of March 13, 2023, the Council of Ministers approved the creation of the "**Vjosa River**" **National Park Administration Office**²⁶, which serves as an inter-institutional structure that will function under the Ministry of Environment. The office has a broad mandate that includes the implementation of the park management plan, monitoring environmental impacts, implementing restoration projects, as well as cooperating with local authorities, public institutions and international partners. Regarding the legal basis for its creation, it acts as a focal point for institutional coordination, environmental education and strengthening the protection of this territory of exceptional natural and ecological value.

The present office is headed by a director appointed by the minister, while its main functioning is financially supported by the state budget and other legal sources. The office also has the right to generate income from the services it provides, thus contributing to its self-sustainability. The establishment of this office marks an important institutional change, as for the first time, a national park in Albania will have a dedicated management structure, focused entirely on its conservation and sustainable development, in accordance with international standards such as the IUCN Green List.²⁷

Albania's legislation requires environmental assessments for all proposed projects, private or public, which may cause significant impacts, direct or indirect, on the environment, as a result of their size, nature or location²⁸, especially those that may affect protected areas, but it does not yet contain a specific or equivalent legal requirement for an "appropriate assessment" as defined in Article 6(3) of the EU Habitats Directive. The obligation to assess environmental impacts on protected areas is currently covered through general Environmental Impact Assessment (EIA) and Strategic Environmental Assessment (SEA) law, rather than a dedicated "appropriate assessment" procedure. The primary LAW that regulates these SEA and EIA in detail is Law No. 10 440, dated 7.7. 2011 "ON ENVIRONMENTAL IMPACT ASSESSMENT" (Amended by Law No. 12/2015, dated 26.2.2015, No. 128/2020, dated 22.10.2020)²⁹, but as regards the total approximation with Article 6.3 of the Habitats Directive there is still no reference to a full approximation. Real cases such as the construction of the Vlora Airport show that no proper EIA-s are being done and the Albanian Government has rejected all the EU's requests since 2020 for its construction and the realization of a proper EIA. Even in this specific case, the Standing Committee of the Bern Convention in December 2023 reacted through a formal recommendation, requesting the suspension of the works until a new and sufficient EIA procedure is conducted. In this specific case, taking into account Article 16 of the Constitution of Albania, International Conventions have supremacy over the specific laws of the country, thus requiring this recommendation to be taken seriously. But even today, according to the EU 2025 Enlargement Package³⁰ Albania is still neglecting to take measures.

Under the Natura 2000 framework, the Birds Directive demands the prevention of activities that could significantly disturb protected species or degrade their habitats. The authorities

must also implement, when necessary, active conservation measures to maintain or restore these species and habitats, taking into account local economic, social, and cultural contexts.³¹ So, in this regard, significant steps to address the illegal killing of birds (IKB) were taken with the **2019 amendments to Albania's Penal Code**³², which introduced criminal penalties for the unlawful killing, destruction, possession, acquisition, or trade of protected wild flora and fauna without appropriate permits. Some of the amendments are:

- Article 201 “Air, Water and Soil Pollution”; (Amended by Law No. 44/2019, dated 18.7.2019);
- Article 202 “Damage to Protected Species of Wild Flora and Fauna”, (Amended by Law No. 44/2019, dated 18.7.2019);
- Article 202/a “Trade of the Protected Species of Wild Flora and Fauna”, (Added by Law No. 44/2019, dated 18.7.2019)
- Article 202/b “Damage to Habitats in Environmentally Protected Areas”, (Added by Law No. 44/2019, dated 18.7.2019)
- Article 207/c “Mistreatment of Animals” (Added by Law No. 44/2019, dated 18.7.2019)



2.1.2 IMPLEMENTATION OF THE BIRDS AND HABITATS DIRECTIVES AND THE INSTITUTIONAL STRUCTURE FOR ITS IMPLEMENTATION:

The effective implementation of the EU Birds and Habitats Directives in Albania depends on both the institutional framework responsible for nature protection and the administrative, technical, and financial capacities of these institutions. While Albania has established the key structures needed for biodiversity governance, significant gaps are still visible in order for Albania to fully align with EU requirements.

The public and administrative structures in Albania lie primarily with the **Ministry of Environment (MoE)**, which oversees national environmental policy and biodiversity conservation. Under its authority operates the **National Agency for Protected Areas (NAPA)**, established in 2015 by Decision of the Council of Ministers No. 102, dated 4.2.2015³³ which is tasked with the management and monitoring of protected areas, including sites identified for future inclusion in the Natura 2000 network. NAPA also coordinates species and habitat protection activities, contributes to biodiversity data collection, and prepares site-specific management plans.

Supporting NAPA at the local level are **12 Regional Administrations of Protected Areas (RAPAs)**, which are responsible for implementing conservation measures on the ground, monitoring habitats and species, and enforcing environmental regulations within their territories. These bodies are central to Albania's future alignment with Natura 2000 requirements but often face capacity challenges related to staffing, funding, and technical expertise.

In addition to NAPA, the **National Environmental Agency (NEA)** plays a key role in environmental impact assessments (EIAs) and strategic environmental assessments (SEAs), which are critical tools for ensuring that development activities do not compromise protected habitats and species. Coordination among these institutions, as well as with NGOs, the scientific community, and local authorities, is essential for the effective implementation of EU biodiversity directives.

The **National Fauna Council (NFC)** was created as an advisory body under the ministry responsible for wildlife protection, with the primary role of supporting the enforcement of the Law on Wildlife Protection and its related by-laws. However, the Council has not fulfilled its mandate effectively, as it has not convened regularly as required by law, nor has it taken meaningful action to address or regulate hunting practices. In April 2025, Albania adopted its first Action Plan against Poisoning.³⁴ A notable development occurred in April 2025, when Albania adopted its first-ever Action Plan to Combat Wildlife Poisoning.

In the context of the implementation of the Green Agenda and the alignment of national policies with EU environmental objectives, the budgeting of the Ministry of Tourism and Environment continues to focus on addressing structural challenges that directly affect the quality of the environment and the sustainability of development. The analysis of budget documents and medium-term planning shows that the funds planned for the period 2025–2027 aim to support a series of interventions oriented towards improving the management of natural resources, reducing pressure on biodiversity and strengthening institutional capacities for environmental monitoring.³⁵



A significant part of the budget continues to focus on the challenges of waste management, which constitute one of the most prominent problems at the national level. Insufficient coverage of the territory with integrated services, the lack of separation at source and the presence of informal disposal points create sustained pressure on ecosystems and require increased capital and operational investments. In this regard, the budget foresees funding for supporting infrastructure, strengthening the collection system and increasing the capacities of municipalities.

One of the most pressing issues is the lack of adequate financial and human resources³⁶. Agencies tasked with nature protection often operate with limited budgets and insufficient staff, making it difficult to conduct regular field inspections, enforce regulations, or respond promptly to environmental infractions. This resource gap is especially problematic in remote or ecologically sensitive areas, where illegal activities are harder to monitor and address.

Another important set of priorities focuses on the protection of biodiversity and the proper functioning of protected areas. Habitat fragmentation, construction developments, and pressures from economic activities, including the impacts of energy projects, require an integrated approach and increased budgets for monitoring, patrolling, and ecological restoration. Despite planned budgetary support, the real needs on the ground remain high, emphasizing the importance of increasing financing and effectively utilizing EU green funds.

Finally, the budget recognizes the critical need to address the impacts of climate change. Floods, droughts, and forest fires necessitate greater financial commitment to adaptation, restoration, and prevention measures. Accordingly, budget programs include interventions for forest management, rehabilitation of damaged territories, and strengthening of response mechanisms.

Overall, the 2025–2027 budget framework shows efforts to comply with the principles of the Green Agenda, but evidence suggests that financial gaps and limited institutional capacities remain significant challenges. This underlines the need for increased dedicated investments, more efficient redistribution of funds and a wider use of EU and international donor financial instruments, in order to make the transition to a green economy truly sustainable and long-term.

A further challenge is that Albania currently lacks a fully developed system to monitor species



Monitoring Migratory Birds in the Fllakë Lagoon: Traces of Life and Death

and habitats. While some progress has been made toward meeting EU reporting obligations, the collection, analysis, and long-term tracking of biodiversity data remain limited and fragmented.³⁷ As a result, policymakers often lack the evidence base necessary for informed decision-making and adaptive management.

Moreover, enforcement of protection measures remains weak, particularly in addressing threats such as illegal logging, poaching, and unregulated development. In many cases, violations go unpunished due to procedural delays, lack of coordination between enforcement agencies, or limited capacity to follow through with investigations and prosecutions.³⁸ These enforcement gaps undermine public trust and allow environmentally harmful practices to continue with minimal consequences.

For example, during the period where the moratorium was expired and the new draft law “On Hunting” is being discussed in the Parliament commission, PPNEA during World Migratory Bird Day (11 October 2025), carried out monitoring in the Fllaka Lagoon, Durres Country with the aim of identifying migratory species that use the area as a resting and feeding station along the Eastern Adriatic corridor. During the monitoring, clear signs of illegal hunting in the territory were also identified, including traces of bird killing.³⁹ These findings show that, although the area offers favorable conditions for migratory birds, anthropogenic pressures continue to negatively affect the integrity of the habitat and the protection of wild fauna.

This situation underlines that controls or monitoring are not done, and greater public awareness on the importance of conserving migratory birds and their ecosystems are needed, especially during the phase that the moratorium is not anymore effective.

On December 4, 2024, the Ministry of Tourism and Environment published for public consultation the draft law “On Hunting”, a legal initiative that aims to update the regulatory framework on the administration of hunting activity and the conservation of wild fauna in the territory of the Republic of Albania. The publication was accompanied by the full documentary package, which included: the draft law, the accompanying report, the official notice for the public consultation, the regulatory impact assessment (RIA) and the individual consultation report. The public consultation remained open until January 1, 2025, offering interested parties, environmental organizations, hunting communities and the general public the opportunity to submit comments and

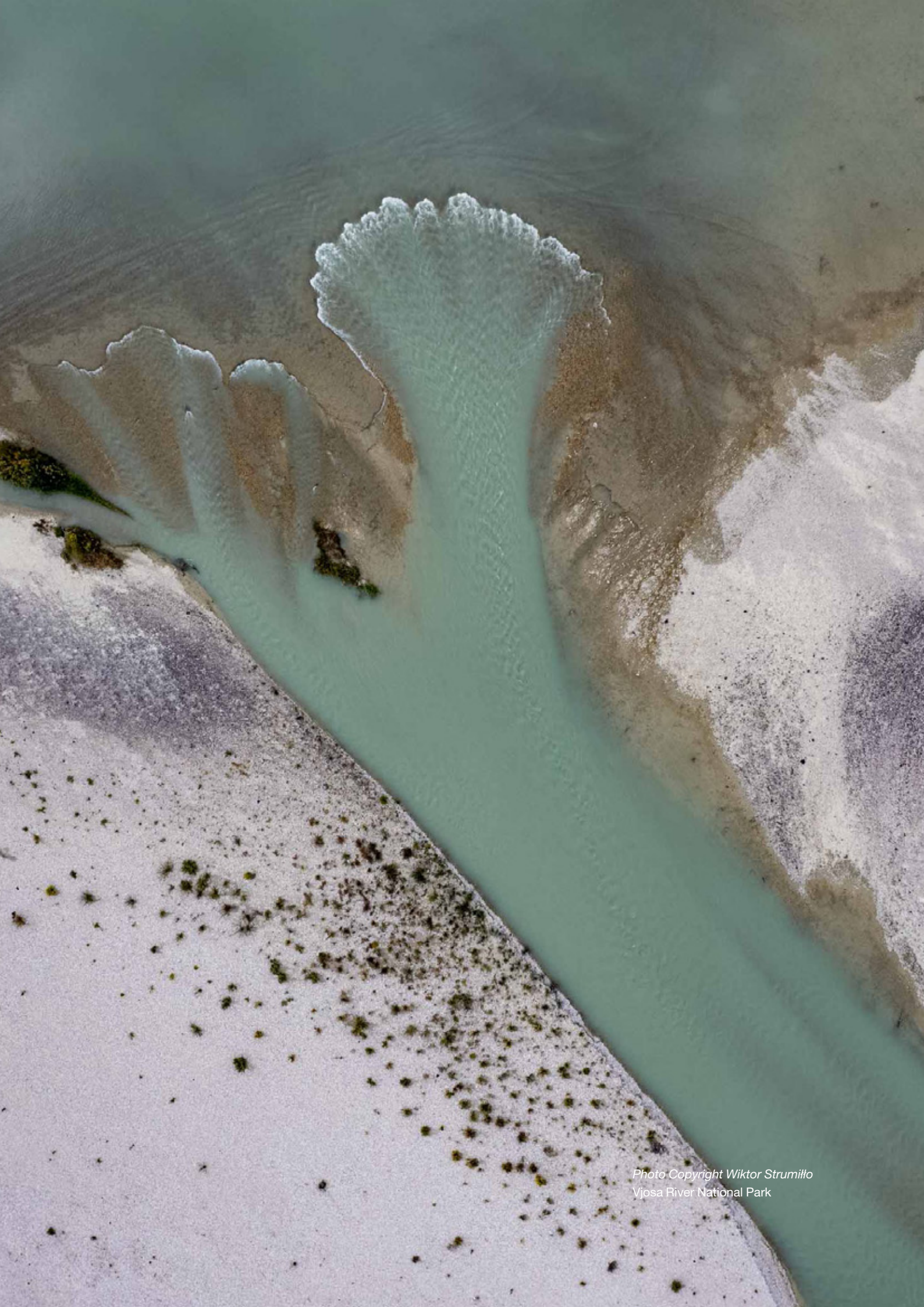


Photo Copyright Wiktor Strumillo
Vjosa River National Park

suggestions on the legal proposal.⁴⁰ Regarding the comments submitted by PPNEA during the consultation meetings on the draft law, we note that with the draft law that was published after the consultation period, most of our recommendations have been taken into consideration, reflecting a positive and cooperative engagement between the relevant stakeholders.



The legislation on the Moratorium in Albania that was in force until mid of 2025 is referred to as LAW No. 60/2022 *“On the proclamation of the Hunting Moratorium in the Republic of Albania.”* This law determines in its article 5 that it is power three years from the date of its entry into force. The date of its entry into force was 21.07.2022 and consequently the end date is 21.07.2025, meaning that it has ended, leaving open and unclear how the regulation on this part will continue. Still nowadays the new hunting law has not yet been approved. In Albania during November, in the Albanian Parliament, the new draft law on hunting has struggled with different discussions in the relevant committees, by the actors involved in this law. This transitional situation between the end of the hunting moratorium and the new draft law (*expected to be approved soon by Albanian Parliament*) is creating uncertainty both at the institutional level and for the general public, regarding the regulation of hunting activities in the future.

In this context, the involvement of various actors has happened where the involved stakeholders were notified of the draft law “On hunting” and also invited to participate in the consultations maintained. The pressure exerted by PPNEA through meetings, publications and appeals to the Fauna Council has contributed to increasing the level of involvement and consultation in this process.

However, this case constitutes an exception and not a general practice. In most cases, involvement remains mainly formal and procedural, not offering real opportunities for valued contribution to legislation related to biodiversity and nature protection. Moreover, procedural mechanisms are often used that aim to minimize or avoid the engagement of civil society organizations in an effective format, as was the case with the law on protected areas.

The case of the Vlora Airport in the Vjosa-Narta protected area is an exceptional case that has been subject to a lengthy and complicated legal process, highlighting problems with delays and procedures in the judicial system. After more than two years of waiting, the case was reviewed by the Administrative Court of Appeal following contradictory decisions of the Court of First Instance and the intervention of the Supreme Court.⁴¹



The Supreme Court delayed the process by focusing on formal aspects of legitimacy and the differences between real and hypothetical damage, without directly addressing the central question: can an airport within a protected area be legitimate under national and international law and conventions? After returning the case to the Court of Appeal, the Administrative Court of Appeal decided to review the case on its merits, resolving the issue of the legitimacy of the parties and allowing the review to focus on the content of the claim.⁴²

2.2 DECLARE NEW PROTECTED AREAS IN LINE WITH THE 2030 CBD TARGETS, 2030 BERN CONVENTION STRATEGY AND EMERALD NETWORK TIMELINE PROPOSED IN 2024

The International Union for Conservation of Nature (IUCN) has developed the *Protected Area Management Categories System* to define, record, and classify the diverse objectives and management approaches of protected areas worldwide. This globally recognized system provides a standardized framework adopted by national governments and international organizations. The Republic of Albania adheres to the IUCN categorization methodology. Accordingly, Albania's Protected Areas (PAs) are classified into six distinct categories, each assessed in accordance with IUCN criteria.

In 2020, under Law No. 81/2017 "On Protected Areas," the Albanian Protected Areas Network (PAN) covered a total surface of 504,826.3 hectares, representing **17.56%**⁴³ of the country's territory. As part of the government's initiative to review and revise the protected areas network, major changes were introduced to the boundaries and status of numerous protected sites.



The National Territorial Council Decision No. 10, dated 28 December 2020⁴⁴, enacted significant modifications, some expanding the protected surface and adding new areas, while others downgraded or removed protection from certain sites. These changes were later formalized through Council of Ministers Decisions (DCMs) in 2022.⁴⁵ Although, the percentage of the total protected area was increased, mainly hilly-mountainous areas, there were serious "cuts" on the coastal areas.

The coastal wetlands were the most affected areas due to the changes in the protected areas' boundaries. Important surfaces were removed from these habitats, shaping the boundaries to align with infrastructural plans, mainly in the tourism sector.

A positive development in the review of the protected area was the proclamation of the Vjosa River as a National Park, creating the first Wild River National Park in Europe. This achievement was seen as a positive step towards shaping the protection of rivers in the future. The positive development of establishing Vjosa National Park began to decline when authorities cancelled the second phase of the proclamation, which was intended to include agricultural lands and the river delta within the park, providing the river with proper protection. Meanwhile, areas that deserved the status of a National Park, like Munella Mountain, which holds a population of the critically endangered Balkan lynx, were only proclaimed a Nature Reserve.

A notable and controversial example is the revision of the Vjosa-Narta Protected Landscape (IUCN Category V⁴⁶). Under DCM No. 694, dated 26 October 2022⁴⁷, a total of 5,551.7 hectares were removed from the protected area. The Vjosa-Narta Protected Landscape was merged with the neighboring Pishë-Poro area (IUCN Category IV); however, 310 hectares in the central zone were excluded, precisely overlapping with the construction site of the Vlora International Airport. Additional reductions occurred along the eastern section, where land cultivated with olive groves and vineyards was excluded.

These revisions were widely criticized for lacking transparent justification and public consultation. The process prompted strong opposition from environmental organizations, academic institutions, and civil society, both nationally and internationally. Despite their objections, the recommendations and concerns raised were largely disregarded, leading several civil society organizations to pursue ongoing legal action.

The procedural and substantive shortcomings observed during the review of Albania's protected areas network have drawn repeated attention at the EU level. Between 2021⁴⁸ - 2025, successive European Commission Progress Reports have expressed continued concern regarding the management, reclassification, and development pressures within Albanian protected areas.

In parallel, several international environmental conventions, namely the Bern Convention on the Conservation of European Wildlife and Natural Habitats, the Convention on the Conservation of Migratory Species of Wild Animals (CMS), and the Agreement on the Conservation of African-Eurasian Migratory Waterbirds (AEWA), jointly assessed the situation through an on-the-spot appraisal (OSA) mission in 2022. Following this assessment, Recommendation No. 219⁴⁹ was adopted and published, urging Albania to ensure stronger protection and compliance with international conservation standards.



Further legislative changes occurred in March 2024, with the adoption of Law No. 21/2024⁵⁰ "On Some Additions and Amendments to Law No. 81/2017 'On Protected Areas.'" This new law has been met with controversy for provisions perceived as weakening environmental safeguards.

Key aspects include:



(i) Enhanced powers for the National Territorial Council to approve "Tourism of excellence infrastructure, rated with 5 stars or more" together with supporting infrastructure in the protected areas and their core zones, including infrastructure such as airports, highways and energy facilities. (ii) Elimination of sub-zoning within Protected Landscapes, which previously served as a mechanism to distinguish between core, buffer, and sustainable use zones.

These amendments were strongly opposed by environmental civil society organizations, academics, and international institutions, including the European Union and relevant conventions, due to their potential to undermine ecological integrity. Shortly after the law's adoption, several new development proposals emerged, notably the project in Zvernec peninsula from Affinity Partners, raising further concern about cumulative impacts on Albania's protected ecosystems.

According to the 2024 National Environmental Agency Report, Albania's current network of protected areas covers **624,610.63 hectares**, equivalent to **21.76%**⁵¹ of the national territory. Of this total, only 2.23%, represented by two sites, has been proclaimed as marine protected areas, the Karaburun–Sazan Marine National Park (IUCN Category II) and the Porto Palermo Nature Park (IUCN Category IV). Although the surface is increasing toward the 2030 goal, the effective protection of the ecological protected areas is diluted because of Law No. 21/2024.



In the Common Position for opening the Cluster 4 of Accession Negotiations, between Albania and the European Commission, the new law is addressed by the following benchmark to close Chapter 27: *“Albania continues to align with the EU acquis in the area of nature protection, including by repealing the incompatible provisions enacted through amendments to the law on Protected Areas (Law No. 21/2024) and by terminating the 2015 legislation on strategic investments. Albania has submitted to the Commission the list of proposed Natura 2000 sites, sufficiently covering the habitat types and species in line with the requirements of the Birds and Habitats Directives. Albania has ensured the capacity to manage the Natura 2000 network, including by granting appropriate protection status to designated areas and effectively implementing the necessary conservation measures leading to their preservation and improvement. Albania demonstrates that it will be fully prepared to ensure the implementation and enforcement of the EU nature protection acquis requirements on the date of accession.”*¹⁵²

2.2.1 MANAGEMENT PLANNING FOR PROTECTED AREAS: CURRENT SITUATION AND ONGOING INITIATIVES:

According to data collected up to the end of 2024, most of the management plans for Albania’s protected areas have either expired, require substantial updates or don’t exist. By taking into consideration the main protected areas category (IUCN - II, IV and V), out of 40 protected areas only 3 of them have an updated Management Plan. Meanwhile, other protected areas categories such as Nature Monuments don’t have Management plans. At the beginning of 2025, several initiatives were launched by the government, in cooperation with national and international non-governmental organizations, to revise and update management plans for the country’s key protected areas. A major initiative in this process is the EU4Nature⁵³ Project, which aims to support the comprehensive revision and modernisation of management plans for most of Albania’s protected areas, ensuring alignment with EU environmental standards and sustainable conservation practices. A summary table with information on the progress of the PA Management Plan status up to date is provided in Annex I. In this table, first are listed those areas with a Management Plan in place, followed by those under assessment and at the end the areas that don’t have a management plan.



PPNEA together with its international partners and donors Euro-Natur and PONT, following the efforts for monitoring and protecting the critically endangered Balkan lynx in Albania, are supporting the process for the development of the Munella Nature Park Management Plan.

This process started during spring 2025 and is ongoing successfully, with the joint participation of the Ministry of Environment, National Agency for Protected Areas and the subordinating bodies at the regional level. Munella Nature Park Integrated Management Plan is following a process based on the Natura 2000 integrated management plans and reporting, raising the capacities of relevant protected areas authorities and preparing the ground for the Natura 2000 implementation framework. The management plan is expected to be finalised and approved during 2026. Moreover, a regional strategy for the Balkan lynx has been developed and submitted to Bonn and Bern Conventions for adoption during the CMS COP15 in March 2026. This strategy has been developed jointly by the Balkan Lynx Recovery Programme partnership, the respective Ministries of Environment in Albania, North Macedonia and Kosovo^{54*}, under the auspices of CMS.

2.2.2 CURRENT ALBANIAN CANDIDATE EMERALD SITES

The Emerald Network is a pan-European ecological network consisting of Areas of Special Conservation Interest (ASCIs). It was established by the Council of Europe within the framework of the Bern Convention⁵⁵. The work for the assessment and adaptation of Emerald Network sites in Albania ended in 2012⁵⁶.

Nowadays, Albania has officially nominated **25** Candidate Emerald sites⁵⁷, **4751.8 km²** with **16.4%**⁵⁸ of the total surface of Albania.



Nevertheless, since the last 11 years, there haven't been any attempts to upgrade and increase the number of these Emerald sites. In addition, from the approval of the list, the sites have a status as “*candidate*” and not a full status as “*Emerald site*”. This delay or gap on proclamation as fully “*Emerald site*” might make the sites more fragile in terms of infrastructure development. It is important to highlight that the Albanian government needs to speed up the process and finalize the establishment of the Emerald Networks, in line with recommendations⁵⁹ of the EU and Bern Convention.



Munella Nature Park
Photo Copyright Arsen Rroshi



Protected landscape "Buna River - Velipojë"

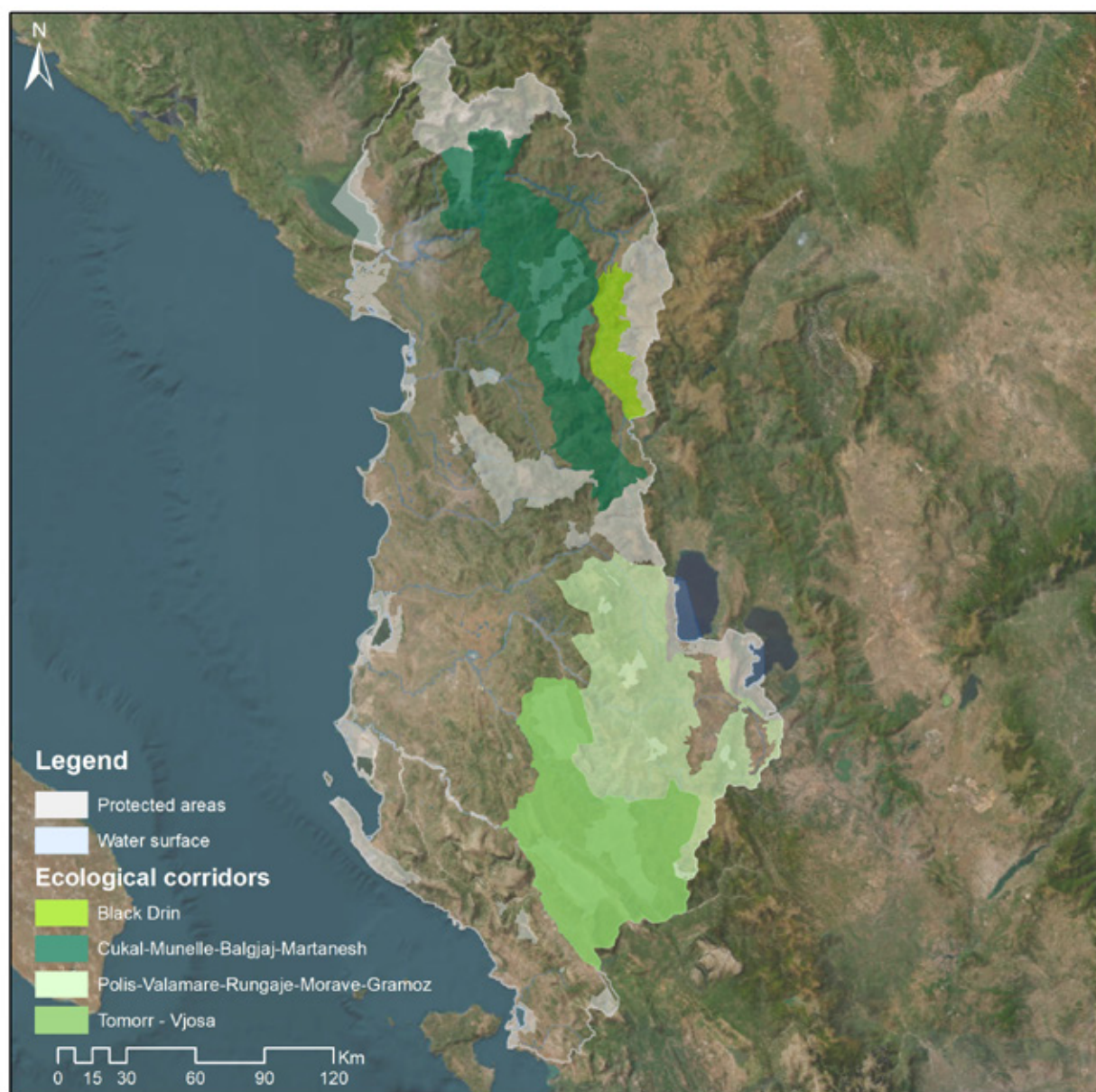
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2.3 LEGALLY PROTECT AND MANAGE AREAS OF IMPORTANCE FOR ECOSYSTEM CONNECTIVITY

Ecosystem connectivity is a key pillar of biodiversity conservation, enabling species movement, genetic exchange, and maintenance of ecosystem processes across landscapes. In Albania, a country characterized by diverse ecosystems, mountains, forests, wetlands and coastal ecosystems, maintaining connectivity is essential for protecting wide-ranging species such as the Balkan lynx, brown bear, wolf, as well as important and rare bird species. Over the last decades, due to social and economic changes going on in Albania, large portions of the native forest ecosystems have been lost causing the endangerment of many species of flora and fauna. Consequently, the populations of species are decreasing, including those of the Balkan lynx, brown bear, wolf, Golden eagle, and other rare species of European importance.

Under the Green Agenda for the Western Balkans, countries are encouraged to legally protect areas of ecological importance and ensure their management for connectivity. A new vision for policymaking as well as a new approach to the design of policy measures, including those of protection of biodiversity as well as those agriculture policies aligned with new EU CAP, should be adopted. Albania does not yet legally recognize corridors as a distinct category, therefore areas identified as functionally important for connectivity remain vulnerable to development pressures. Update of the Document of Strategic Policies for the Protection of Biodiversity (2015-2020), which includes the Action Plan, as the key policy document on nature and biodiversity protection domain has considered these issues, as part of the National Strategy for Development and Integration.

The NBSAP of Albania streamlines the CBD objectives, it aims to ensure a more effective and coherent implementation. Further on, it considers other commitments in line with other agreements on biological diversity.



Map
Connectivity Conservation Areas
Copyright Emir Gjyzeli

The **Law No. 139/2015 “On Local Self-Government”** regulates the organization and functioning of local authorities in Albania, establishing municipalities as the sole first-tier governance units. Under this law, municipalities are responsible for approving urban, territorial, and regulatory plans, as well as plans for energy and natural resource use, waste management, and regional nature parks. However, many local governments lack the institutional capacity to develop effective spatial plans, enforce land management regulations, and prevent uncontrolled development. Limited staffing, training, and technical resources further constrain the sustainable management of natural resources. Strengthening local administrative and human capacities is therefore essential to improve the enforcement of environmental laws and the implementation of biodiversity and connectivity measures. Moreover, an ongoing discussion by the government refers to work towards a new territorial reform starting which will aim at reorganising the local administrative government.

Albania's legal framework for biodiversity and habitat protection relies primarily on the Biodiversity Law, the Law on the Protection of Wildlife, and the Law on Protected Areas. These laws address species conservation, invasive species management, and habitat protection, including critical habitats for birds and migratory species. The network of protected areas supports Albania's contribution to the NATURA 2000 ecological network, however a complete National Ecological Network (Alb-NEN) has yet to be established as a codified list of areas important for connectivity protection and restoration in Albania, as many potential corridors remain unstudied, especially in less accessible or privately owned landscapes.



Effective biodiversity conservation depends not only on protected areas but also on **landscape connectivity**. At the international level, the EU's Biodiversity Strategy for 2030 calls for a well-connected Trans-European Nature Network covering 30% of the EU's land area through ecological corridors. This network builds on the existing Natura 2000 network, established under the EU Birds and Habitats Directives, which forms the cornerstone of biodiversity conservation in the EU. Article 10 of the Habitats Directive encourages member states to designate habitats that promote connectivity, particularly as a strategy for responding to climate change. Member states are required to designate Special Protection Areas and Sites of Community Importance.

Strengthening ecological connectivity in Albania is critical to achieving favourable conservation status for species, habitats, and landscapes. Aligning national networks with EU-level (Natura 2000) frameworks can enhance resilience, support climate adaptation, and fulfil international biodiversity commitments. The opening of **EU accession Chapter 27** presents a key opportunity to reinforce Albania's biodiversity and connectivity frameworks. Advancing Chapter 27 negotiations can help ensure compliance with EU environmental acquis, including the designation of protected areas, habitat restoration, connectivity of ecological networks, and cross-sectoral integration of environmental considerations into forestry, wildlife, and spatial planning policies. Municipal and regional spatial plans do not consistently reference identified connectivity areas, limiting practical protection and management.

Albania has undertaken several initiatives to identify areas of ecological importance for connectivity; however, these remain initiatives led by donors and civil society organizations without legal provision and recognition. In this regard, two main initiatives were carried out by the DINALP CONNECT project (2023–2025), which identified priority corridors connecting mountain and forest ecosystems, such as Shebenik–Korab, Prespa–Ohrid, and Sharr–Koritnik. These corridors were mapped using land-cover analysis, GIS, and species movement data. A more recent initiative is the assessment studies supported by the Prespa Ohrid Nature Trust Fund (PONT) and conducted by the organization PPNEA in Albania. PPNEA and PONT studies assessed the connectivity between areas in Albania and North Macedonia, to identify functional corridors for large mammals, providing ecological data that can guide conservation action. PONT has also been supporting the work at the regional level by assessing the connectivity potential in neighbouring countries Greece and North Macedonia. Recently, a Strategy for Connectivity Conservation in the southwestern Balkans was released by PONT and 14 non governmental organisations working across the region to enhance and protect connectivity areas for species and habitats. PONT Connect Strategy aims to *'improve the conservation of ecosystem connectivity and the sustainable comanagement of ecological corridors thereby maintaining and enhancing linkages between cross-border protected areas.'*

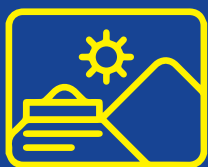
Cross-Sectoral legal frameworks such as the forest sector also play a great role to enhance the implementation of connectivity conservation in Albania. Forestlands must be

managed to preserve natural species composition and ecological functions. These objectives are operationalized through legally mandated forest management plans, prepared for both private and state forest areas, which guide sustainable management and conservation practices. Unfortunately, in Albania forest management plans have not been developed, and their management is shared between municipalities and protected areas authorities. The last strategic document on forest management is the Forestry Sectoral Policies in Albania (2018). The establishment of National Forest Agency in 2020 with its mission to enhance *the good governance of forests at the national level, their preservation and development, the sustainable and multifunctional use of resources in the national forest fund, as a natural asset of national importance*, has limited human capacities and financial resources to safeguard the national forests of Albania. Since 2016, Albania has adopted a forest moratorium to allow forest recovery and stop illegal logging.

The Law on Hunting and Wildlife Management is another key framework relevant to connectivity. In this regard, also Like forest resources, wild game species are considered renewable resources and a public good of national and international importance. Spatial planning also plays a crucial role. The Law on Spatial Planning (Law 107/2014) establishes a hierarchically and horizontally integrated approach, ensuring that land-use decisions consider ecological connectivity alongside socio-economic development. Complementing this, the Law on Environmental Impact Assessment provides cross-sectoral oversight, ensuring that development projects assess and mitigate potential impacts on biodiversity and ecological networks.

2.3.1 EMERGING THREATS AND CHALLENGES TO PROTECTED AREAS:

Mountain Package (MP) Law: We are deeply concerned about the new MP Law which the government has adopted as the “Mountain Package” (al. *Paketa e Maleve*) initiative.⁶⁰ Although framed as support for agrotourism, the plan allows 500 businesses to develop in northern Albania, including within protected areas, and hands strategic development roles to Municipalities and so-called “diaspora investors”⁶¹ — many of whom lack formal land titles due to gaps in the historic Law 7501 (dated 19.07.1991) “On the Land”. Past misuse of agrotourism funds for large-scale hotel projects raises serious doubts. This initiative risks opening the door to exploitation of fragile mountain ecosystems under the guise of rural development and the recently published Albania Report 2025 from the European Commission clearly states that this law “...opens the way to large scale construction or investment projects... reducing forest areas and contradicting the 2020 Forest Law”.



Biological diversity is increasingly threatened by illegal human activities, like forest falling, timber harvesting, the overuse of species of medicinal and aromatic plants and the poaching of wild animals and birds. Furthermore, unsustainable practices of logging, plant collection, hunting, mining and other activities conducted with principles of quick profits have put incredible pressure on natural resources; a pressure that continues to grow to this day.

Without a legal framework dedicated to the ecological corridors, there is limited enforcement and monitoring by the relevant authorities. Even in areas where connectivity is referenced in management plans, there are few binding obligations or systematic monitoring mechanisms. Fragmentation risks due to infrastructure projects, agricultural expansion, and hydropower development threaten unprotected corridors, highlighting the need for formal legal protection. It is especially important to consider integrating connectivity concepts in the territorial planning process, considering the very weak capacities of municipalities to monitor the non-protected still very important biodiverse areas.

3. CONCLUSIONS

Despite recommendations and concerns expressed by both civil society and the European Union, the transposition of the directives into national legislation still falls short of full alignment with the *acquis communautaire*. In particular, regarding the Law “On Protected Areas,” Albanian institutions and the government have not yet taken the necessary steps to amend the provisions that permit harm to protected areas and their biodiversity.

The responsible institutions, such as the Ministry of Environment, the National Agency for Protected Areas (NAPA) and the Regional Administrations of Protected Areas, play a key role in the progress that our country must make towards the full transposition of these Directives, but it must be said that they face a lack of human capacity, financial resources and technical means. This situation has led to weaknesses in the implementation of laws and in the control of environmental violations, especially in protected areas.

Regarding above, to PPNEA knowledge the process for the National Biodiversity Strategy and Action Plan drafting has not yet started, despite the fact that the existing strategic document has ended its validity. To date, PPNEA has not been informed of any initiative for public consultation, and any official information published on the relevant institutional platforms can not be found. The lack of transparency and a structured consultation process raises serious concerns for the continuity of biodiversity policies, especially at a time when Albania has clear obligations to comply with the EU biodiversity framework

It is appreciated that Albania has achieved a significant increase in the area of protected areas, now covering over 21% of the national territory in line with the objectives of the Convention on Biological Diversity (CBD) and the Bern Strategy for 2030. However, referring to the legal amendments to the law on protected areas, this quantitative increase does not necessarily correspond to qualitative improvements in the level of protection. The processes of re-evaluating the boundaries of protected areas, often carried out with limited transparency and public consultation, have had negative consequences for several habitats of international importance, particularly in coastal areas.

Interventions such as the reduction of the area of the Vjosa-Narta Protected Landscape for the construction of the Vlora airport have often questioned the commitment of the Albanian authorities to EU standards and formal recommendations of international conventions.



Despite several efforts to update management plans under projects such as EU4Nature, many protected areas still do not have approved or operational plans. Similarly, the national network of Emerald areas has remained unchanged since 2012, reflecting a lack of political will to expand this process.

The preservation of ecological connectivity in Albania remains an informalized field and concept, despite its recognition as an essential element for biodiversity protection and climate change adaptation. Even these days, Albania does not have a legal framework that recognizes and protects ecological corridors as a separate category of territory. Initiatives to identify areas important for connectivity have been carried out mainly within the framework of civil society and donor projects, such as DINALP CONNECT or PONT, but their results have not been integrated into official development policies and plans.

Regarding the progress made in mapping and recognizing key areas for ecosystem connectivity, supported by strategic documents, project-based studies, and transboundary initiatives, formal legal protection specifically for connectivity areas is lacking, and institutional capacity for enforcement and monitoring remains limited.

Albania, as an EU candidate country, plays a key role in regional environmental governance, given its rich biodiversity, extensive protected area network, and strategic position within transboundary ecological corridors. However, the implementation of the biodiversity pillar of the GAWB remains uneven, with challenges linked to legislative alignment, institutional coordination, and enforcement.

4. RECOMMENDATIONS

The most important step is to urgently accelerate the complete transposition and implementation of the EU Birds and Habitats Directives into national legislation. This includes revising the Law on Protected Areas (No. 21/2024) to remove or amend provisions that permit potentially harmful activities within protected territories and their core zones, a process that should be initiated by the Ministry of Environment. The law should explicitly prohibit construction and resource extraction that threaten the ecological integrity of these areas and ensure alignment with the standards required under the EU *acquis communautaire*. In parallel, Candidate Emerald Sites should be formally designated and granted full legal protection, as required under the Bern Convention and as a prerequisite for effective implementation of the EU nature directives.

Institutionally, it is crucial to strengthen the human, technical, and financial capacities of the Ministry of Environment, NAPA, and the Regional Administrations of Protected Areas (RAPAs). Adequate funding and staff training should be ensured to enable regular field inspections, enforcement of conservation laws, and the effective management of protected areas.

Additionally, greater inter-institutional coordination between NAPA, NEA, and local authorities is essential to prevent overlapping mandates and ensure coherent decision-making.

In parallel, Albania should adopt a new National Biodiversity Strategy and Action Plan (NBSAP) to replace the expired version and ensure that it integrates measurable targets for habitat protection, species monitoring, and restoration. In developing the new NBSAP, the Ministry of Environment should focus on setting clear, measurable, and time-bound targets for habitat protection, species monitoring, and ecosystem restoration. To ensure effectiveness, the plan should establish robust monitoring and evaluation mechanisms, leveraging national agencies, research institutions, and civil society organizations to track progress and update interventions as needed. Furthermore, integrating the NBSAP with existing policies on climate adaptation, land-use planning, and sustainable development will help mainstream biodiversity conservation across sectors, while fostering stakeholder participation at local and regional levels will enhance ownership and long-term sustainability.

To strengthen the effectiveness of biodiversity policies and management, it is recommended that the Ministry of Environment establish a National Coordination Platform for Biodiversity and Protected Areas, to function as a permanent cooperation mechanism between the Directorate of Biodiversity, the National Agency for Protected Areas, the Regional Directorates of the Forest Service, the State Inspectorate of Environment and Forests, as well as related ministries and institutions (Agriculture, Urban Development and Tourism, Internal Affairs, Customs, Local Government).

By formalizing identification and legal protection of connectivity areas, Albania can move from project-based initiatives toward a sustainable, nationally coordinated approach, fulfilling Green Agenda commitments and contributing to regional biodiversity resilience.

To strengthen ecological connectivity in Albania, it is essential to introduce a formal legal category for ecological corridors, complete with clear criteria and procedures for their designation, management, and monitoring. Identified corridors should be integrated into regional and municipal spatial plans, ensuring that connectivity principles are considered in Environmental Impact Assessments and Strategic Environmental Assessments. A national database or geoportal should be established to centralize information on corridors, while standardized monitoring schemes for species and habitats, particularly in the context of Natura 2000 mapping should be implemented. Building the capacities of relevant authorities, including NAPA, regional administrations, municipalities, the National Forest Agency, and research institutions, is critical, alongside fostering inter-sectoral coordination and engaging civil society in corridor management and advocacy. Finally, long-term financing must be secured through dedicated national budgets and by mobilizing EU IPA Green Agenda funds to ensure the sustainable restoration, management, and monitoring of ecological corridors.





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ANNEX I

Protected Area name	IUCN category	Size (ha)	Management Plan Status	Period covered	Management Plan funding support
Butrinti National Park	II	8622.2 ha	Updated and approved	(2020–2030) ⁶²	Albanian-American Development Foundation
Dajti National Park	II	28561.85ha	Updated and approved	2024-2034	NAPA
Ulza Lake Nature Park	IV	4205.15 ha	Updated and approved	2022-2032	NAPA
Divjakë-Karavasta National Park	II	22 389.08 ha	Management Plan active	2015-2025	JICA
Buna River - Velipojë	V	21,678.85 ha	Management Plan active	2016-2025	IUCN
Pogradec Lake Protected Landscape	V	28 000 ha	Management Plan active	2020-2025	Global Water Partnership (GWP)
Prespa National Park	II	27 613.05 ha	Management Plan as-sessed and not approved	-	KFW-GFA
Benja Nature Monuments	III		Assessment completed		NAPA
Munella Nature Park	IV	20 760.05 ha	Assessment in process		PPNEA, EuroNatur, PONT
Albanian Alps National Park	II	82844.65ha	Assessment in process		UNEP
Llogara National Park	II	1769.2 ha	Assessment in process		EU4Nature project
Bredhi i Hotovës-Dangelli National Park	II	36003.76 ha	Assessment in process		EU4Nature project
Zagori Managed Reserve	IV	24 607.63 ha	Assessment in process		EU4Nature project
Bredhi i Sotirës Nature Park	IV	4 927.67 ha	Assessment in process		EU4Nature project
Lugina e Shalës Nature Park	IV	10 619.35 ha	Assessment in process		EU4Nature project
Lurë – Mali Dejës National Park	II	19288.88 ha	Assessment in process		EU4Nature project
Shebenik National Park	II	34 507.9 ha	Assessment in process		EU4Nature project
Vronomeri Nature Monument	III		Assessment in process		EU4Nature project
Tomorri National Park	II	27 158.5 ha	Assessment in process		NAPA



Shkodra Lake Management reserve	IV	24 049.75 ha	Assessment in process		NAPA
Korab-Koritnik Nature Park	IV	53 850.00 ha	Management Plan missing	-	-
Pishë Poro – Nartë	V	16 124.61 ha	Management Plan missing	-	
Nikolicë	V	510 ha	Management Plan missing		-
Krastë-Verjon	V	1469.239 ha	Management Plan missing		
Bredhi i Kardhiqit Managed Nature Reserve	IV	4 303.6 ha	Management Plan missing		
Bredhi i Sotirës Nature Park	IV	4 927.67 ha	Management Plan missing		
Bredhi i Zhulatit Managed Nature Reserve	IV	936.2 ha	Management Plan missing		
Cangonj Managed Nature Reserve	IV	250.3 ha	Management Plan missing		
Karaburun Managed Nature Reserve	IV	17 490.7 ha	Management Plan missing		
Gërmenj Managed Nature Reserve	IV	1 410 ha	Management Plan missing		
Dardhë – Xhyrë Managed Nature Reserve	IV	400.3 ha	Management Plan missing		
Kune – Vain – Tale - Patok – Fushëkuqe – Ishëm Managed Nature Reserve	IV	8 092.3 ha	Management Plan missing		
Lugina e Gjergjovicës Managed Nature Reserve	IV	2 966.3 ha.	Management Plan missing		
Polis Managed Nature Reserve	IV	45.1 ha	Management Plan missing		
Mali me Gropa – Bizë – Martanesh Nature Park	IV	26 043.34 ha	Management Plan missing		
Qafështamë Nature Park	IV	6 864.36 ha	Management Plan missing		
Stravaj dhe Sopot Managed Nature Reserve	IV	1 548.9 ha	Management Plan missing		
Syri i Kaltër Nature Park	IV	293.30 ha	Management Plan missing		
Bogovë Managed Nature Reserve	IV	342.1 ha	Management Plan missing		
Balloi Managed Nature Reserve	IV	323.3 ha	Management Plan missing		
Zagori Nature Park	IV	24 607.63 ha	Management Plan missing		

Table 1

PA Management Plan status



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