

Tirana, 22 January 2026

To:

Mr. Edi Rama

Prime Minister of the Republic of Albania

Kryeministria Bulevardi Dëshmorët e Kombit 7 1010, Tiranë,
Albania

Mr. Sofjan Jaupaj, Minister of Environment

Object: Request for the Suspension of Any Construction Initiatives on Sazan Island Due to the Threat to Protected Species and the Area's Natural and Cultural Heritage

Dear Prime Minister Edi Rama,
Dear Minister of Environment Sofjan Jaupaj,

On behalf of the 41 signatory organisations representing 28 countries of this letter, we write to express our deep concern regarding recent developments on Sazan Island, the only Albanian Island. The project “Strategic Investment with Special Procedure¹” approved in January 2025 envisions the construction of a luxury resort. The proposed development would involve interventions over an area of 45 hectares on Sazan Island, raising serious concerns about its environmental impact and its compliance with Albania’s international obligations.

Sazan Island is surrounded by the Marine National Park declared by Decision of the Council of Ministers, dated April 28, 2010, and is classified as a National Park (Category II according to IUCN standards). Furthermore, this Marine Protected Area is designated as a Specially Protected Area of Mediterranean Importance (SPAMI)² under the Protocol concerning Specially Protected Areas of the Barcelona Convention, which aims to protect biodiversity and critical ecosystems in the Mediterranean Sea. Moreover, Sazan Island is also recognized as part of a Key Biodiversity Area (KBA)³ and an Important Bird Area (IBA), within the Vlora Bay, Karaburun and Çika Mountain KBA/IBA site^{4 5}.

The sea around Sazan offers valuable and key habitats for the globally most endangered marine mammal species, the Mediterranean Monk Seal. The littoral around Sazan is characterized by vast Posidonia underwater meadows, essential for biodiversity and climate.

The construction of a luxury resort, with large-scale infrastructure interventions such as sea traffic, roads, and sewage systems, poses a serious threat to these delicate habitats. Such interventions bring

¹ https://aida.gov.al/wp-content/uploads/2025/01/VKIS_Resorti_Turistik_Ishulli_i_Sazanit_.pdf

² https://rac-spa.org/sites/default/files/doc_spamis/liste_aspm_2020.pdf

³ <https://www.keybiodiversityareas.org/site/factsheet/2908>

⁴ BORGHESI_F,2013_The breeding bird_community_of_Sazani_island

⁵ <https://www.keybiodiversityareas.org/site/factsheet/2908>

noise, artificial lighting, pollution, and increased human presence all of which may drive away wildlife from critical areas, including coastal caves that are essential for the survival of the monk seal.

We stress that this project and its method of approval are in direct contradiction with Albania's commitments under the EU accession process, particularly in light of the opening of negotiations for *Chapter 27 (Environment and Climate Change)*. EU's Common Position on Cluster 4 states as closing benchmarks for Chapter 27 full alignment with the EU acquis on nature protection, biodiversity, environmental impact assessment, and transparent, inclusive governance. In this context, the Common Position specifically mentions alignment with the EU acquis 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.

Against this background, we respectfully and urgently request:

1. The immediate suspension of any executive or parliamentary decision related to the advancement of this project;
2. The formal inclusion of the terrestrial part of Sazan Island within the Karaburun–Sazan Marine National Park, recognized as a Specially Protected Area of Mediterranean Importance (SPAMI);
3. The official listing of the island as an Emerald Candidate Site⁶, as part of the ecological network of Areas of Special Conservation Interest (ASCIIs) established under the auspices of the Council of Europe, and as part of the future EU Natura 2000 network;
4. Full compliance with Albania's obligations under international conventions on nature and biodiversity protection, particularly those related⁷ to the conservation of the Mediterranean monk seal and its habitats;

We call upon you to take immediate action to prevent the degradation of one of Albania's and the Mediterranean's rarest ecological treasures in the name of nature conservation, rule of law, and responsibility to future generations.

⁶ <https://emerald.eea.europa.eu/>

⁷ Convention on Biological Diversity (CBD 1992)

Barcelona Convention for the Protection of the Marine Environment and the Coastal Region of the Mediterranean (1975, amended in 1995)

Protocol Concerning Specially Protected Areas and Biological Diversity in the Mediterranean (SPA/BD) (1995)

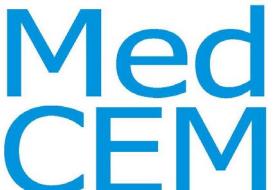
Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)

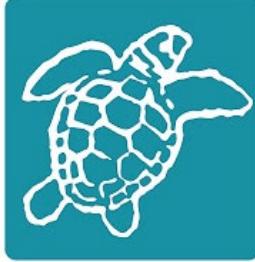
Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979)

Signatures:

| No | Institution's Name | E-mail address | Institution's Logo |
|----|---|------------------------|---|
| 1 | Protection and Preservation of Natural Environment in Albania | contact@ppnea.org |  |
| 2 | Center for Protection and Research of Birds of Montenegro | czip@czip.me |  |
| 3 | EcoAlbania | contact@ecoalbania.org |  |
| 4 | Montenegro Dolphin Research (MDR) | info@dmad.org.tr |  |
| 5 | Society for the Protection of Prespa | spp@spp.gr |  |

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| 6 | Center for Environment (Bosnia and Herzegovina) | info@czzs.orr |  <p>Centar za životnu sredinu</p> |
| 7 | Resource Environmental Center Albania (REC Albania) | info@recshqiperi.org |  |
| 8 | NGO Eco-team | office@ecoteam.me |  <p>ECO-TEAM ENVIRONMENTAL PROTECTION</p> |
| 9 | NGO Montenegrin Ecologists Society | drustvoekologa@gmail.com |  <p>CRNOGORSKO DRUŠTVO EKOLOGA</p> |

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| 10 | PIM Initiative | pim@initiative-pim.org |  <p>PIM INITIATIVE</p> <p>INTERNATIONAL NGO FOR MEDITERRANEAN SMALL ISLANDS</p> |
| 11 | Mediterranean Center for Environmental Monitoring (MedCEM) | medcem@yahoo.com | <p>Mediterranean Center for Environmental Monitoring</p>  <p>Med CEM</p> <p>Mediteranski Centar za Ekološki Monitoring</p> |
| 12 | Tour du Valat | secretariat@tourduvalat.org |  <p>Tour du Valat</p> <p>A research institut for the conservation of Mediterranean wetlands</p> |
| 13 | Green Home | greenhome@greenhome.co.me |  <p>GREEN HOME act green</p> |

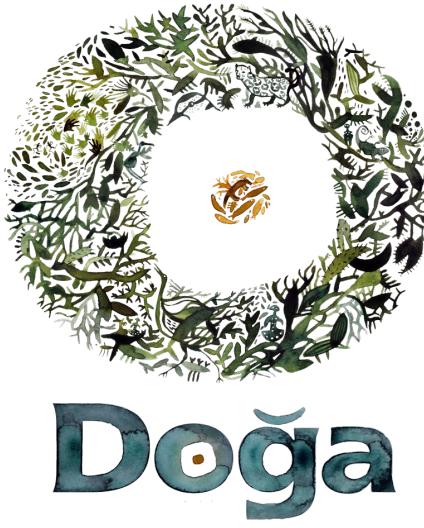
| | | | |
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| 14 | SPOT Marine Life | info@cyprusturtles.org |  |
| 15 | Society for the Protection of Nature in Lebanon | news@spnl.org |  |
| 16 | Mediterranean Association to Save the Sea Turtles - MEDASSET | medasset@medasset.org |  <p>MEDASSET Mediterranean Association to Save the Sea Turtles</p> |
| 17 | Archipelagos - environment and development | archipelagos.greece@gmail.com |  |

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| 18 | MOm / Hellenic Society for the Study & Protection of the Monk Seal | info@mom.gr |  |
| 19 | The Octopus Foundation | contact@octopusfoundation.org |  |
| 20 | Archipelagos - ambiente e sviluppo, Italia | archipelagos.italia@gmail.com |  |
| 21 | BirdLife Europe and Central Asia | anouk.puymartin@birdlife.org |  |

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| 22 | Delphis NGO, for the conservation of marine mammals, Israel | elasar.ma@gmail.com |  |
| 23 | Mediterranean Biodiversity Consortium | douchin@tourduvalat.org |  |
| 24 | Tethys Research Institute | istituto.tethys@gmail.com |  |

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| 25 | BirdLife Sverige | daniel.bengtsson@birdlife.se |  BirdLife SVERIGE |
| 26 | Lipu-BirdLife Italy | claudio.celada@lipu.it | |
| 27 | OTOP-BirdLife Polska | jaroslaw.krogulec@otop.org.pl |  otop BirdLife Polska |
| 28 | BirdLife Norway | martin@birdlife.no |  BirdLife NORWAY |

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| 29 | Association Biom | lora.rajic@biom.hr |  |
| 30 | Gibraltar Ornithological & Natural History Society | info@gonhs.org |  |
| 31 | Latvian Ornithological Society | viesturs@lob.lv |  |
| 32 | BirdLife Cyprus | birdlifecyprus@birdlifecyprus.org.cy |  |

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| 33 | The Wilderness LLC | a.vintchevski@gmail.com |  <p>ДЗІКАЯ ПРЫРОДА</p> |
| 34 | Doğa Derneği | doga@dogadernegi.org |  <p>Doğa</p> |
| 35 | Bird Protection and Study Society of Serbia | sekretar@pticesrbije.rs |  <p>DRUŠTVO ZA ZAŠTITU I PROUČAVANJE PTICA SRBIJE</p> |
| 36 | Macedonian Ecological Society | contact@mes.org.mk |  <p>МАКЕДОНСКО ЕКОЛОШКО ДРУШТВО</p> |

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|----|---------------------------------------|--|--|
| 37 | Czech Society for Ornithology | verm@birdlife.cz |  |
| 38 | Monk Seal Alliance | apertuisot@fpa2.org |  |
| 39 | Prince Albert II of Monaco Foundation | Vila Girasole 16 Boulevard de Suisse Monaco MC 98000 T. +377 98 98 44 44 |  |
| 40 | Foundation Segre | info@fondationsegre.org |  |
| 41 | EuroNatur | gabriel.schwaderer@euronatur.org |  |

Annex 1

The Sazan Island's western side is defined by steep vertical cliffs and deep canyons that contain marine caves key habitats for the Mediterranean monk seal (*Monachus monachus*), one of the world's most endangered marine mammals. The species is listed on the IUCN Red List of Endangered Species and in Annexes I and II of the Convention on Migratory Species (CMS). Sazan Island and its surrounding waters are home to at least 36 globally threatened marine species. The infralittoral hard beds and rocky substrates around the island support extensive meadows of *Posidonia oceanica*, a seagrass species vital to the health and productivity of the Mediterranean ecosystem. Owing to its long-term isolation, Sazan serves as a natural laboratory for studying evolution and species distribution, hosting several endemic organisms. Despite the use as military site from 1947 - 1992, much of the island remains pristine, preserving remnants of Albania's original coastal vegetation that extend down to the shoreline.⁸

Since 2019, scientific data on the presence and distribution of the Mediterranean monk seal have been collected through systematic monitoring carried out by the Regional Administration of Protected Areas of Vlora, in collaboration with national, regional, and international NGOs that are part of the Monk Seal Alliance network. Monitoring activities have included camera-trap surveys and local sighting reports. All collected data confirm a strong and consistent presence of the species within the Karaburun–Sazan Marine Protected Area.

*This table lists 36 globally threatened marine species found in Karaburun – Sazan Marine National Park in Albania. It includes marine plants, sponges, mollusks, crustaceans, fish, reptiles, pinnipeds and cetaceans. All these species have the protection status under several international conventions such as Barcelona convention, Bonn convention, Cites and Bern conventions. Many of them such as *Posidonia oceanica*, *Pinna nobilis*, various emblematic invertebrates and vertebrates like *Caretta caretta*, *Monachus monachus* and *Delphinus delphis* are listed in the Annex II of Barcelona Convention.*

| Specie name | SPA/ BD Protocol of the Barcelona Convention ¹ (1996) | | Bonn ² (2006) | | CITES ³ (2006) | Bern ⁴ (1993) |
|---|--|----------|--------------------------|---------|---------------------------|--------------------------|
| | Ann. II | Ann. III | App. I | App. II | | |
| <i>Magnoliophyta</i> | | | | | | |
| <i>Posidonia oceanica</i> | + | | | | | + |
| <i>Cymodocea nodosa</i> | | | | | | + |
| <i>Phaeophyta</i> | | | | | | |
| <i>Cystoseira amentacea</i> var. <i>spicata</i> | + | | | | | + |
| <i>Rhodophyta</i> | | | | | | |
| <i>Lithophyllum byssoides</i> | + | | | | | |
| <i>Lithophyllum torochanter</i> | + | | | | | |
| <i>Spongia</i> | | | | | | |
| <i>Geodia cydonium</i> | + | | | | | |
| <i>Hippospongia communis</i> | | + | | | | + |
| <i>Spongia officinalis</i> | | + | | | | + |
| <i>Petrobiona massiliana</i> | | | | | | + |

⁸ MEDAIL F et all,2014 Terrestrial flora Sazani island light

| | | | | | | |
|------------------------------------|---|---|---|---|---|---|
| Cnidaria | | | | | | |
| <i>Corallium rubrum</i> | | + | | | | + |
| Mollusca | | | | | | |
| <i>Ranella olearia</i> | + | | | | | + |
| <i>Tonna galea</i> | + | | | | | + |
| <i>Charonia tritonis</i> | + | | | | | + |
| <i>Zonaria pyrum</i> | + | | | | | + |
| <i>Pholas dactylus</i> | + | | | | | + |
| <i>Pinna nobilis</i> | + | | | | | |
| <i>Lithophaga lithophaga</i> | + | | | | + | + |
| Crustacea | | | | | | |
| <i>Homarus gammarus</i> | | + | | | | + |
| <i>Maja squinado</i> | | + | | | | + |
| <i>Scyllarides latus</i> | | + | | | | + |
| <i>Scyllarus arctus</i> | | + | | | | + |
| <i>Palinurus elephas</i> | | + | | | | + |
| Echinodermata | | | | | | |
| <i>Paracentrotus lividus</i> | | | + | | | + |
| <i>Ophidiaster ophidianus</i> | + | | | | | + |
| <i>Centrostephanus longispinus</i> | + | | | | | + |
| Pisces | | | | | | |
| <i>Anguilla anguilla</i> | | | + | | | |
| <i>Umbrina cirrhosa</i> | | | + | | | |
| <i>Thunnus thynnus</i> | | | + | | | |
| <i>Sciaena umbra</i> | | | + | | | |
| <i>Hippocampus guttulatus</i> | | | | | + | |
| <i>Epinephelus marginatus</i> | | | + | | | + |
| <i>Xiphias gladius</i> | | | + | | | |
| Reptilia | | | | | | |
| <i>Caretta caretta</i> | + | | + | + | | + |
| Pinnipedia | | | | | | |
| <i>Monachus monachus</i> | + | | + | + | + | + |
| Cetacea | | | | | | |
| <i>Tursiops truncatus</i> | + | | | + | + | + |
| <i>Delphinus delphis</i> | + | | + | + | | + |

1 Protocol Concerning Specially Protected Areas and Biological Diversity in the Mediterranean of the Convention for the Protection of the Mediterranean Sea Against Pollution

2 Convention on the Conservation of Migratory Species of Wild Animals

3 Convention on International Trade in Endangered Species of Wild Fauna and Flora

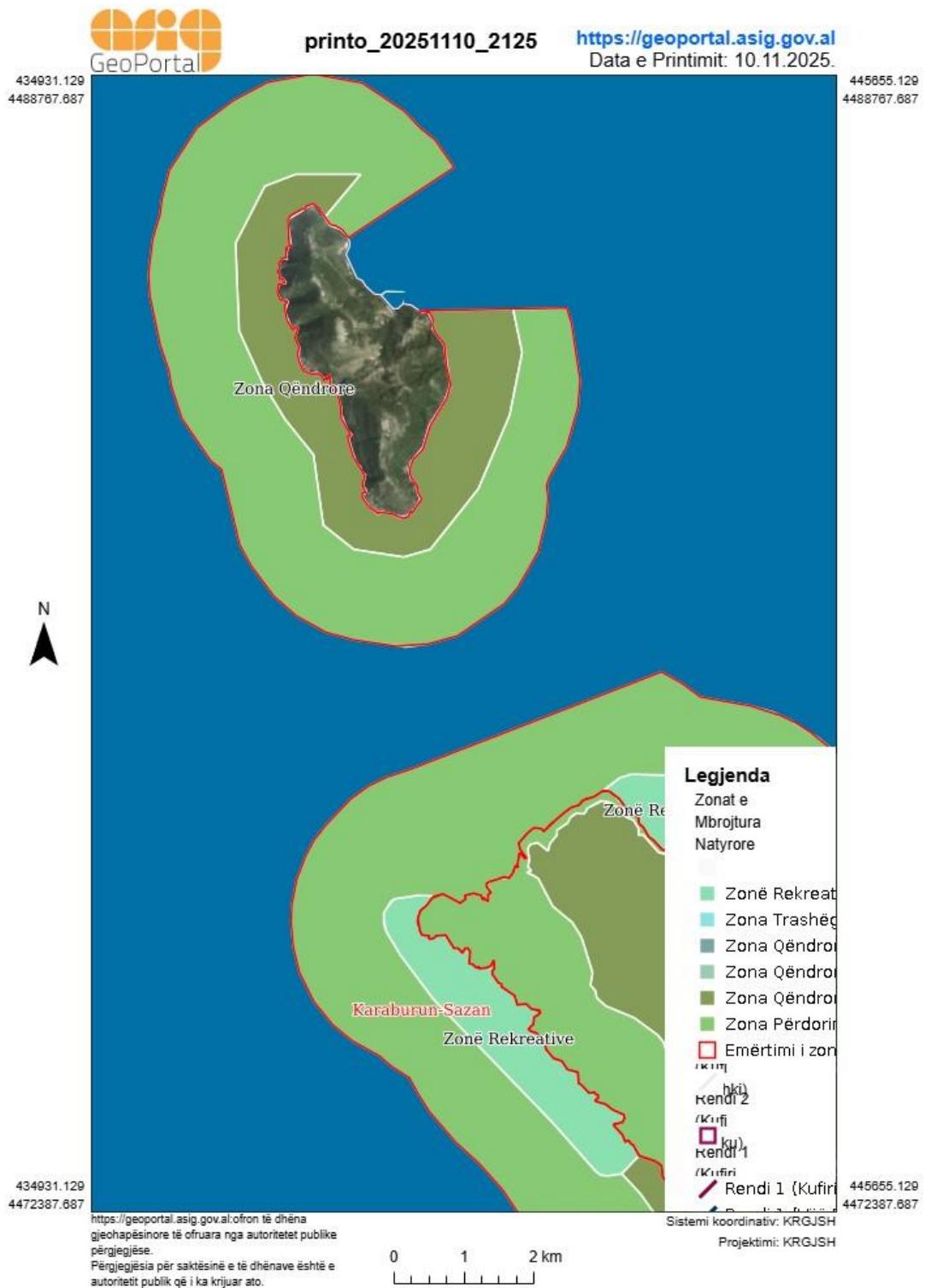
4 Convention on the Conservation of European Wildlife and Natura Habitats

Source: Beqiraj S., Zuna V., Dodbiba E. (2010). Priority Action Plan for Sazani-Karaburuni Marine Protected Area. GEF/UNDP. Tirana: 74 pp.

Annex II

The map below shows the Karaburun–Sazan Marine National Park, declared a Protected Area under Albanian law in 2010. The focus is on Sazan Island, which is surrounded by the Marine National Park and divided into two subzones: the Core Zone (dark green) and the Sustainable Use

Zone (light green). This map is sourced from geoportal.asig.gov.al



Annex III

Check-list of species reported during the Sazani island survey of May 2013. Taxonomic reference: AERC (<http://www.aerc.eu/documents.html>). B=Breeding; M=Migrating; E=Erratic

Source: “The breeding bird community of Sazani island (Albania) : state of knowledge and management recommendations” F. Borghesi (ISPRA) 2013

| <i>Taxon</i> | <i>Field mission of May 2013</i> | <i>Phenology</i> |
|--|----------------------------------|------------------|
| <i>Phalacrocorax aristotelis desmarestii</i> | X | E |
| <i>Accipiter nisus</i> | X | M ?, B ? |
| <i>Buteo buteo</i> | X | B |
| <i>Aquila chrysaetos</i> | X | E |
| <i>Falco tinnunculus</i> | X | B |
| <i>Falco subbuteo</i> | X | M ?, B ? |
| <i>Larus michahellis</i> | X | E |
| <i>Columba livia</i> | X | B |
| <i>Streptopelia decaocto</i> | X | B |
| <i>Streptopelia turtur</i> | X | B |
| <i>Otus scops</i> | X | B |
| <i>Bubo bubo</i> | X | B |
| <i>Caprimulgus europaeus</i> | X | B |
| <i>Apus apus/pallidus</i> | X | B |
| <i>Apus melba</i> | X | B |
| <i>Merops apiaster</i> | X | M |
| <i>Ptyonoprogne rupestris</i> | X | B |
| <i>Hirundo rustica</i> | X | M ? B ? |
| <i>Delichon urbicum</i> | X | B |
| <i>Cecropis daurica</i> | X | B |
| <i>Oenanthe hispanica melanoleuca</i> | X | M ? B ? |
| <i>Monticola solitarius</i> | X | B |
| <i>Turdus merula</i> | X | B |
| <i>Iduna pallida</i> | X | B |
| <i>Sylvia cantillans albistriata</i> | X | B |
| <i>Sylvia melanocephala</i> | X | B |
| <i>Sylvia borin</i> | X | M |
| <i>Parus caeruleus</i> | X | B |
| <i>Oriolus oriolus</i> | X | M ?, B ? |
| <i>Lanius isabellinus</i> | X | M |
| <i>Garrulus glandarius</i> | X | B |
| <i>Corvus monedula</i> | X | B |
| <i>Corvus corone cornix</i> | X | B |
| <i>Corvus corax</i> | X | B |
| <i>Passer domesticus</i> | X | B |
| <i>Fringilla coelebs</i> | X | B |
| <i>Carduelis chloris</i> | X | B |
| <i>Carduelis carduelis</i> | X | B |
| <i>Carduelis cannabina</i> | X | B |