

REQUEST FOR INSPECTION

August 5, 2007

To: Executive Secretary, The Inspection Panel
1818 H Street, NW, Washington, DC 20433, USA
Fax No. 202-522-0916;

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THE INSPECTION PANEL

1. I, Petrit Levendi, on behalf of the Association of Tourist Operators [CTO] in Vlorë, Albania, and other affected individuals who are also local residents living in Vlorë and in the area covering the northern part of the Bay of Vlorë, known as Trepot Beach, Narta Lagoon Coastal Strip and Bisht Poro, present the following Request for Inspection. My address and that of the CTO are attached below.
2. We have suffered, or are likely to suffer, harm as a result of the World Bank's failures or omissions in the Albania Coastal Zone Development Management and Cleanup Project [Hereinafter "Project"].
3. Describe the damage or harm you are suffering or are likely to suffer from the project or program: According to the its PAD, "*the development objective of the proposed Integrated Coastal Zone Management and Clean-up Project (ICZMCP-APL1) is to set-up and initiate an integrated coastal zone management approach to reduce coastal degradation...*"
 - (i) Although the Project covers an area of the Albanian coastline from Butrint region in the South (Ionian Sea) to the Porto Romano in the North (Adriatic Sea), it nevertheless excludes from its scope and implementation the area covering the northern part of the Bay of Vlorë up to the mouth of River Vjosa. This area is part of the larger Vlorë Region, a unique geographical and environmental entity containing very important historical, cultural attractions and natural protected areas. The entire area from the Caesar's Pass in Palasa in the South¹ to Bisht Poro and the village of Delisufaj close to the Vjosa Mouth in the North² is very significant for the environment, tourism, safe fisheries, natural habitat, ecosystem, coral colonies as well as for the unique historical and cultural significance of the entire Vlorë Bay, the Narta Lagoon and the hinterland.
 - (ii) By focusing only on the Southern Albanian Coastline, and by artificially dividing Vlorë Bay into two differing regions, the Project

¹ This is the place where Caesar landed during the Roman Civil War to fight the armies of Pompeii.

² In this place it is believed to be the lost city of Spinartiza, and important trade and diplomatic center in early Middle Age. It is noteworthy that a local NGO, the Civic Alliance for the Protection of the Bay of Vlorë will propose to the Albanian government to declare as a protected area under Albanian law the entire Bay of Vlorë, from the Caesar's Pass to the Vjosa River Mouth, including Karaburun Peninsula, Sazan Island and its immediate hinterland.

- adopts a Solomonian solution to the integrated coastal zone management and cleanup strategy in Albania, which is discriminatory, simply unnatural and fundamentally harmful to our economic and interests.
- (iii) The Project aims to become some sort of a "comprehensive umbrella program" covering several World Bank programs in the area. According to the PAD, "the Bank [will] play a catalytic role in harmonizing development assistance activities affecting Albania's coastal zone and in mobilizing further donor support for the coast". However, by excluding the northern section of the Vlora Bay from its focus and operation, the Project creates a dangerous vacuum, which is significantly harmful to tourism development in Vlora Bay and its vicinity:
 - a. Measures such as installation of state-of-the-art water supply, sewage and waste-management systems are focused only for the Saranda and Himara municipalities, while they are badly needed in the municipalities of Orikum and Vlora, as well as in the communes of Qendër and Radhima;
 - b. The Project covers the decontamination of the Porto Romano area in the Durrës region, but it ignores the on-going decontamination efforts at the chlorine alkali and PC factory area in the Vlora region, thus leaving this area to the mercy of oil-storage developers;³
 - c. Moreover, such discriminatory approach opens the way for other potentially detrimental development projects, with long-standing negative consequences of an especially negative character over the entire Bay of Vlora and the Albanian Adriatic-Ionian coastline;⁴
 - (iv) While the real gateway to Albania's tourism and valorization of cultural heritage is widely accepted to be the Bay of Vlora, the Project places its focus on the city and harbor of Saranda only;⁵

³ Although under de-contamination procedures, this area is being eyed the Italian company La Petroliera Italo-Rumena for a large oil-storage and deposit project.

⁴ For example, this is the case of a World Bank financed oil-based power plant at Treport Beach, with a lifespan of only 25 years, which is subject of another separate investigation by the World Bank and directly contravenes the CZM Project. This project will bring irreversible damage to the Albanian coastline, something which the Project tries to prevent... See also another quote from its PAD: "the CAS, based on the findings of Growth and Poverty Reduction Strategy, emphasizes that natural resources degradation threatens the country's development and poverty alleviation. In this context, Albania's coastal zone is one the country's most valuable assets..." See also "Pollution from ships. The Vlora regional administration ranks oil spills from passing ships among the major concerns. This is magnified by the proximity of the ship routes to the shore and by unfavorable current patterns that transport pollution to the shores of the southern region." [PAD]. The World Bank financed oil-based power plant in Vlora is projected to use imported oil, which will further increase ship pollution in Vlora Bay for the 25 years lifespan of the project...

⁵ See, for example the component of the Project for the Transformation of the Port of Saranda into a dedicated ferryboat and passenger terminal to facilitate access of passengers and vehicles to south Albania. This is another example of the Project's veiled goal of promoting the interests of tourist operators in Greece. Vlora, on the other hand, is a major gateway of tourism from Western Europe as it connects Albania with ports in Italy such as Brindisi, Otranto.

- (v) In short, the very purpose, goals and importance of the Project are being undermined by focusing on the Southern part of the coast, by excluding the Northern Part of the Vlora Bay, and by leaving out of the Project the entire seashore from the City of Vlora to the Vjosa River Mouth, which is one of Albania's most valuable portion of her National Seashore, composed of sand dunes, lagoon habitat, river estuary, bird sanctuaries, endangered plants and other species, etc.;
- (vi) We also believe that such exclusion undermines our economic interests in favor of tourist operators in Greece. Vlora Bay is a major, independent gateway for tourism in Albania, while the excessive focus on the Saranda harbor places Albania's tourism industry under the economic clout of tourist operators in Corfu, Greece⁶.

4. List (if known) the World Bank's operational policies you believe have not been observed. We believe the Bank has violated policies concerning environment, public participation, cultural heritage and non-discrimination.

5. We have raised our concerns with World Bank consultants or staff at a meeting in Vlora in. ...On a separate note, concerns regarding the importance of the Bay if Vlora have been raised in several communications with the Bank from Dr. Anna Kohen, Honorary Citizen of Vlora. The responses received have not been satisfactory.

6. The World Bank cannot build with one hand and destroy with the other. We believe the above referenced project should be extended immediately and at this very stage and not at a later one to include the entire area of the Vlora Bay up to the Vjosa River Mouth. We understand that this is in conflict with the other World Bank projects. We nevertheless request from the Inspection Panel to carry out an eligibility assessment and conduct a full investigation on this matter.

Signatures: _____

Date: _____



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Association of Tourist Operators, c/o Petrit Levendi

List of attachments:

We do authorize you to disclose our identities

⁶ Supra Note 5.

We do authorize you to disclose our identities

[illegible]