RESEARCH ARTICLE (Open Access)

Quality Review of EIAs (Environmental Impact Assessments) in Albania

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Abstract

This study provides data on the quality of Environmental Impact Assessment (EIA) reports in Albania, focusing more on their content and meeting the criteria set out in Albanian legislation, but not only. The study was conducted referring to 200 reports drafted during 2021.

The results show a significant lack of compliance with legal criteria for the structure and content of an EIA report. The first most problematic aspect, which in itself is the main reason for the poor quality of assessments, is that they are prepared generally by a single person who can by no means have knowledge of all the aspects covered by an EIA.

Other shortcomings include: non-reference of information sources; lack (in most cases) of the methodology followed for report preparation, biodiversity assessment and impact forecasting; lack of consultation with stakeholders or relevant experts; lack of alternatives about project development; insufficient biodiversity assessment; lack of indirect impacts; not determining the significance of the impacts; lack of cost-benefit analysis and other aspects such as climate change or ecosystem services.

More complete data are provided for the legislation that supports the assessments, physical characteristics of the development area such as: hydrology, geology, climate (except flora and fauna), data about the project and its location, environmental discharges, to some extent also the social aspects, duration and extent of impacts and environmental management / mitigation measures.

Keywords: Preliminary EIA; Profound EIA; Monitoring; Management; Impacts; Metodology; Legislation; Biodiversity, Albania.

1. Introduction

The drafting of EIA reports is an obligation deriving from Law No. 10 440, dated 7.7. 2011 "On Environmental Impact Assessment", as amended [17], for the implementation of proposed projects, private or public, which may cause significant negative impacts, direct or indirect, on the environment, as a result of their size, nature or location. This law is fully aligned with Directive 85/337 / EEC, dated 27 June 1985 "On the assessment of the effects of public and private projects on the environment", as amended [13].

EIAs are defined as tools that identify, predict, evaluate, mitigate and communicate to the public the environmental and social consequences of proposed projects [25]. They first appeared in the United States with the passage of the National

Environmental Policy Act in 1969 and their use has since spread globally as many countries have adopted EIA requirements in their environmental legislation [15].

Legal entities, licensed by the National Registration Center (NRC), are responsible for the preparation of EIA reports, for the activity of environmental impact assessment and environmental audit, as well as / or individuals certified by the ministry ministry responsible for the environment, as EIA experts and environmental audit. Albanian legislation clearly defines the criteria to be applied for the form and content of an EIA report, criteria which are not

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always met. In addition to the legally binding criteria, there are recommendations from reports and studies that can be considered and assist in this process.

The realization of this assessment is triggered by the problems often encountered with environmental impact assessments for sensitive environmental issues in the country, reports which have often become the cause for the orientation of court decisions.

2. Material and Methods

For conducting this study 200 reports were reviewed, of which 180 preliminary EIAs and 20 profound. These are reports compiled during 2021. The reports were randomly selected and turn out to have been drafted by 54 different entities / individuals (individuals with an environmental expert license). They include activities of various kinds and represent each region of the country.

The work consists of creating a database with "evaluation criteria" for each report, where it is noted whether the report meets or not each of the criteria. At the same time, additional notes are kept that help in the analysis of the results.

Criteria used for assessment are criteria sanctioned by law (Law No. 10 440, dated 7.7. 2011 "On Environmental Impact Assessment", as amended [17]; Decision No. 13, dated 4.1.2013 "On the Approval of Rules, Responsibilities and Deadlines for the Development of the Environmental Impact Assessment Procedure" [7]; Decision No. 598, dated 1.7.2015 "On Determining the Rules and Procedures for the Impact Assessment on the Transboundary Environment" [9]; Decision No. 686, dated 29.7. 2015 "On the Approval of the Rules, Responsibilities and Deadlines for the Development of the Environmental Impact Assessment (EIA) Procedure and the Procedure for the Transfer of the Environmental Declaration Decision", amended [10]; Decision No. 912, dated 11.11.2015 "On Approval of the National Methodology of the Environmental Impact Assessment Process" [11]) or recommended by reports / studies [24], etc.).

Similar studies / reports have been undertaken in the past, but few are focused on the content of EIAs. The adaptation of the legislation to the European one, the most common types of development activities, etc. were mainly addressed ([3]; [2]; [12]; [19]; [24]; etc.).

3. Results and Discussion

The reports turn out to have been drafted generally by a single expert (68.5% of them, 137 reports) and belong mainly (39%) to infrastructure projects for urban purposes (residential / service facilities), followed by industrial ones.

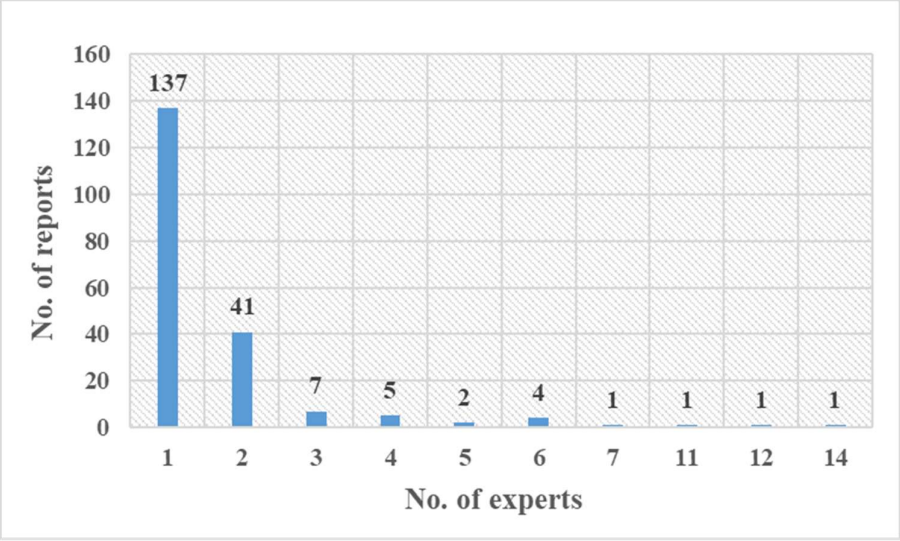

Figure 1. Number of experts in EIA reports

Table 1: Types of projects in the EIAs reviewed

Type of activity	No. of projects (EIAs)
Infrastructure projects for urban development (residential / service facilities)	78
Infrastructure projects for the development of industrial real estate	30
Extractive industry (quarries and mines)	22
Electricity generation and transmission industry	21
Tourism and leisure (Tourist villages, hotels, guesthouses, etc.)	20
Installations for intensive animal breeding	9
Transport infrastructure projects (Roads, railways, tunnels, etc.)	8
Water supply installations	5
Waste collection / disposal installations	3
Oil and gas pipeline / storage installations	2
Groundwater extraction installations	1
Underground telecommunication network	1

3.1. Content of reports

As for the orientation legislation used, it is often out of date, referring to already repealed laws or bylaws. Most of the reports (60.5%) provide a modest methodology for the way the report is prepared, the way of providing information and the work stages. However, it is often incomplete, not addressing every aspect involved in the EIA.

Only 13% of the reports reviewed refer to the sources of information used. This information is mainly related to the theoretical part of the EIA, the physical environment of the development area (hydrology, geology, biodiversity, etc.). This figure is certainly very low and shows a lot about the overall quality of EIAs. Also, there are cases that the literature listed at the end of the report is not cited in its content.

Another problem highlighted is the lack of consultation during the drafting of reports (As shown in Fig. 2). Consultations are not only about consulting the public, which the law requires only for profound EIAs, but also consulting with experts or other stakeholders or who can contribute to the drafting of a qualitative EIA report.

According to the data analyzed in a 2018 study on HPP projects in Albania, in most of them, stakeholders are involved in the EIA procedure, or in 72.7% of cases reviewed [24].

According to the DCM no. 247, dated 30.4.2014 "On determining the rules, requirements and procedures for informing and involving the public in environmental decision-making", in Chapter III it is quoted that the public can participate in the process of monitoring the environmental impact of projects , subject to profound EIA [8].

CONTENT OF THE REPORTS	PERCENTAGE OF REPORTS	NR. OF REP.
Is the legal framework on which the EIA is based given?	91	182
Is the applied methodology for drafting the EIA given?	60.5	121
Are the sources of information used referenced?	13	26
Is information provided on the consultations carried out during the drafting of the report?	18.5	37

Figure 2. Review of the content of EIAs

In addition to the above, the reports present a high degree of inaccuracy in the orthography of the Albanian language. They also present problems with the correct spelling of scientific terms.

Often not all anticipated EIA objectives are met. Excessive technical information is also provided in certain EIAs. The report should be understandable to both expert readers and the general public. During the work a high similarity was noticed between the reports, mainly between those written by the same expert / group of experts, despite the fact that it is about different locations and different categories of activity. Sometimes, whole paragraphs are repeated within the same report, either incorrectly or to fictitiously increase the number of pages. Reports range from 13 to 638 pages.

3.2. Physical characteristics of the development area

The data describing the developing area are given in most of the reports, respectively those for the hydrography of the area (93%), geology (72%) and climatic conditions (77.5%). However, during the analysis it was noticed that, in some reports, the specific data for the developing area are quite limited, and they are based mainly on studies or monitoring on a larger scale, mainly at the county or region level. Nevertheless, most reports do not cite the source of the information, not enabling its veracity during the EIA decision-making process.

PHYSICAL CHARACTERISTICS OF THE AREA	PERCENTAGE OF REPORTS	NR. OF REP.
Are data provided for nearby water sources?	93	186
Are data provided on the geology of the developing area?	72	144
Are data provided for the climate of the area?	77.5	155

Figure 3. Description of the proposed development area in the EIA reports

3.3. Description of the proposed project

The large-scale lack of consideration of other development alternatives is really worrying. As shown in the figure 4, only 7.5% of the reports do an analysis of alternatives. As an excuse for the lack of such an analysis, experts claim that the site chosen for development is predetermined by state institutions (eg areas for the exploitation of minerals) or is private property, which can not be relocated. However, alternatives should not only focus on determining the most favorable location but also on selecting the most suitable technological processes, materials to be used, time of works, etc. Also, the alternative of doing nothing should be considered (alternative 0). A proper assessment of alternatives includes describing them, presenting their environmental consequences, and explaining the reasons for accepting or rejecting it [4].

It is important for an EIA report to accurately determine and present according to the system required by law the coordinates of the area designed for development. 30% of the reports do not meet such a condition. Coordinates are important for decision-making orientation and stakeholders interested in the importance of the area (eg its possible inclusion in the network of environmental protected areas or distance from them, water sources, archaeological sites, etc.).

A similar concern is raised in the UNDPA report of 2018, according to which about 80% of HPP EIAs lacked detailed project descriptions. This may refer to location details (incorrect GPS coordinates), key features of the project, or other features of the project, such as roads or power lines [24].

Another important criterion for the decision-making process is the work program and processes that will be implemented within the project development. 45% of the reports do not meet such a criterion. Regarding the work schedule, only a small part of the reports provide a graph of the works / operations.

Most of the reports claim that the implementation of the project is in line with the development plans of the area but do not provide information on which plans are in question.

PROJECT DESCRIPTION	PERCENTAGE OF REPORTS	NR. OF REP.
Have other project development alternatives been considered and analyzed?	7.5	15
Are the coordinates of the development area given?	70	140
Is the program for the implementation of the project (activities) described, detailing the duration of the works (operation and decommissioning as appropriate)?	55	110
Is information provided on the relevance (compliance) of the project with spatial, urban, environmental, economic, etc. development plans?	54.5	109
Is information provided on the use of natural resources (raw materials), their quantity, method of provision and generating capacity?	30.5	61

Figure 4. Description of the proposed projects in the EIA reports

3.4. Description of biodiversity

Article 14 of the Convention on Biological Diversity (CBD) requires that parties consider the impacts on biodiversity in the environmental impact assessment process [20]. The impact on biodiversity is probably the most important, especially in natural or semi-natural areas, which is why we have singled it out in our analysis. The figures below shows a marked lack of seriousness in providing biodiversity data in the developing area of each project.

Habitat description is performed in only 27.5% of reports. Identification of potential priority habitats is rarely done. Coincidence with potential areas of international ecological networks (Natura 2000, Emerald, etc.) is almost not considered in any report. Illustrative maps of the habitats present are also missing. Significant lack of data is also observed for information about flora and fauna, especially for the latter. In most reports the information is extremely general, mainly at regional or national level. The list of identified species in the area is missing in 85.5% of the reports, which indicates a lack of real field studies. National or international endangerment / conservation status is not defined in most cases. From the verifications of the data it results that in some cases, despite the fact that the report emphasizes the absence of species with endangered status, from the given list of species it turns out the opposite.

Also, a considerable part of the reports justify the lack of impacts on the flora with the floristic poverty of the area. However, no matter how few species are present, the potential for impact remains. Moreover, herbaceous vegetation is often neglected in the assessment.

Often the written information with the images from the field presented have contradictions (e.g. in the picture it shows the presence of a developed vegetation while in the description of the vegetation it is denied).

Sometimes the list of species is given only for the flora or any particular group of fauna. The accuracy of the data is questioned by the presence in the list of species, whose distribution area does not correspond to the proposed area for development, or which has no scientific data to support it (eg Balkan lynx is sometimes listed in the fauna of areas of the western lowlands of Albania, or is indicated for the presence of amphibians in dry urban environments).

The same information on flora and fauna is given in different reports, with the same species. It also happens that certain reports do not provide any data on flora and fauna.

From the data in the reports, 75 (37.5%) of them state and provide information that a field survey was conducted for the study.

It is particularly important to provide detailed information on existing ecosystems and biodiversity, as this would be beneficial to the development of mitigation measures and the overall determination of whether the proposed development should continue [4].

Regarding the identification of negative impacts on biodiversity, the majority (72.5%) but not enough, present these impacts. From the comparison between the reports for different areas of the country and different categories of activities, it appears that the data are fictitious, often repeating the same information, especially in reports compiled by the same individual / entity.

Invasive species also have a significant impact (second in importance after habitat fragmentation) in reducing global biodiversity. The latter can be

accidentally brought into the natural / semi-natural habitats around the developing area or sometimes even intentionally, mainly as ornamental plants. Their presence in the area or the risk of their introduction during the project development is taken into account only by 10% of the reviewed reports.

However, the biggest problem in terms of biodiversity treatment in EIA seems to be the use of the study methodology. Only 7.5% of the reports include a study methodology of flora and fauna.

Recently, the treatment of protected areas in EIA has been considered, as areas with generally higher biodiversity. It turns out that 83.5% of the reports determine whether or not the development area is part of the protected areas. At least 19 projects are proposed to be developed within the territory of protected areas of different categories or located closer to natural monuments as provided by law. We say at least 19 because 50% of the reports do not determine the distance from the protected area, or at least give a map of the position of the area in relation to the protected areas. 5 reports despite emphasizing that the project area does not intersect protected areas, they are within them. Natural monuments are often overlooked in presenting distance from protected areas. In this regard, there is a lack of legal provisions. Thus, in terms of restrictions on the exploration and extraction of liquid and gaseous hydrocarbons, there are no restrictions regarding the distance from the coastline and marine protected areas Manfra et al. 2020[18].

Problems in analyzing the impacts on the protected areas of hydropower projects have also been identified by the UNDPA report [24].

Among the measures for the protection / compensation of biodiversity are mentioned plantings with non-native species, even invasive species (eg Robinia pseudoacacia), or pine species, which in certain environments are not recommended. Such results regarding the treatment of biodiversity in assessments, are somewhat expected given that only 8 reports had a biologist in the working group.

DESCRIPTION OF BIODIVERSITY	PERCENTAGE OF REPORTS	NR. OF REP.
Are the habitats of the study area described?	27.5	55
Is the vegetation (vegetation cover) of the study area described?	54	108
Is the fauna of the study area described?	46	92
Is a list of plant and animal species identified in the area presented?	14.5	29
Has a field study been conducted on biodiversity?	37.5	75
Is the conservation status of the species present determined?	32.5	65
Are data provided for direct or indirect impacts on biodiversity?	72.5	145
Is information provided on the presence or potential impacts of invasive species?	10	20
Is the methodology used for the biodiversity study presented?	7.5	15
Is information provided if environmental protected areas are affected?	83.5	167

Figure 5. Biodiversity data in EIAs

3.5. Addressing social impacts

Certain reports are named ESIA (Environmental and Social Impact Assessment), to indicate that the social impact of infrastructure developments is of particular importance.

In recent decades, the phenomenon of alienation of agricultural land from continuous and uncontrolled urbanization is quite common. This has also come as a result of the neglect, by developers and decision-making, of the long-term analysis of this issue. Apart from agricultural land, the areas traditionally used for grazing or collecting medicinal plants or other secondary products have not been spared either. This land use is also related to ecosystem services and cost-benefit analysis, which are part of this study and will be analyzed below. Apart from the fact that the current land use is not treated to the proper degree

(only 53% of the reports), information on the historical use of the territory is almost completely missing. The data are often general, at the regional level.

Cultural heritage can also be affected by construction in the vicinity of archeological sites, cultural monuments, etc. It turns out that only 58.5% of reports consider this impact, indicating whether or not they interact with them.

The most important social aspect is certainly the population and human health. The analysis took into account not only the potential impact on the displacement of the local population and their health, but also of the employees who are expected to be involved in the project. It should be noted that in this section of the analysis only possible negative impacts are considered. The positive impacts from project development will be addressed below. Returning to the findings of the study, it turns out that the social aspect is not sufficiently addressed. 76.5% of reports do not consider this aspect of development impacts at all. Data on the area's population are generally referenced from the 2011 census, while later data are available.

SOCIAL ASPECTS	PERCENTAGE OF REPORTS	NR. OF REP.
Is information provided on the existing land use of the development area?	53	106
Is information provided about the potential impact on cultural heritage?	58.5	117
Are data on population and human health provided?	76.5	153

Figure 6. Addressing social aspects in EIAs

3.6. Description of environmental impacts

In terms of potential environmental discharges, almost all reports provide data. Certainly some provide more extensive information and some less.

Uncontrolled discharges into the environment have long been a major problem in Albania. In 70% of cases, mineral water is not previously treated in decantation pipes, but discharged into the open environment polluting groundwater and soil [23].

Only about 1/8 of the reports provide data on the potential impact on climate change. Reports covering projects on a larger scale, which consequently have a greater impact on climate change (especially HPPs), lack this aspect in their impact analysis.

Also, the treatment of impacts on landscape is seemingly satisfactory from the figures obtained from the study, however it should be noted that this aspect is addressed briefly, without using any study methodology and in many cases without giving an impact scale. Also, certain reports of projects such as quarries, HPPs, residential complexes, etc. express that there will be no impact on the landscape, which is impossible to happen, due to the very nature of these projects. According to Susaj et al. dumping of inert materials and waste, etc., have affected over the years the damage to the visual landscape in Albania [23].

Secondary interventions related to the project, such as the opening of new roads, the construction of temporary camps, the connection to the electricity or sewerage network, are not adequately addressed. These actions have in themselves a significant impact on the environment, sometimes even more important than the project itself.

Important for an EIA report is the analysis of all environmental impacts, including cumulative ones. Only 27% of reports provide data on this category of impacts. In fact there is no binding legal basis for considering the cumulative impact of one project with other projects [1].

By themselves, the impacts of a project on the environment may not be so significant, but in interaction with other nearby projects they become more significant. The combined impact of the projects reviewed, with other projects developed or planned to be developed in the future, is not addressed in most reports (81.5%). Interaction with other projects is envisaged as a monitoring objective in many reports, but is not further addressed, as is the case of other objectives.

Finally, anticipating the risks associated with project development is another important point to include in an EIA report. The report should include both normal operation and the possibility of accidents. Only 65% of the reports reviewed carry out this.

DESCRIPTION OF IMPACTS	PERCENTAGE OF REPORTS	NR. OF REP.
Is information provided on possible discharges into the environment (polluted water, gases / dusts, waste, etc.)?	99.5	199
Is noise pollution information provided?	98	196
Is information provided on the potential impact on climate change?	24	48
Is information provided about potential impacts on the landscape?	82	164
Are impacts resulting from other project-related developments (new roads, electricity grid, fuel supply, labor camps, etc.) considered?	54	108
Are the cumulative impacts of the project given?	27	54
Is the combined impact with existing and / or future projects considered?	18.5	37
Are potential risks / accidents foreseen?	65	130

Figure 7. Description of environmental impact

3.7. Characteristics of environmental impacts

In general, data on the duration of impacts and their possible spatial extent are present (in over 80% of reports).

However, the classification of impacts according to a degree of significance is not done even in 50% of the reports. Such an escalation of impacts is important to make a more effective plan of measures for prevention, reduction or compensation in the future. Usually the significance assessment of impacts should be done using matrices. The use of SWOT analysis (Strengths, Weaknesses, Opportunities and Threats) is effective in EIA reports, but it was used only in 5 reports reviewed in this study. It is worth mentioning that this analysis is exactly the same in all the reports where it was found, showing that it is fictitious.77% of reports give the expected positive impacts of the project. However, most of them focus only on the social aspect, mainly that of employment. Only 5 reports make a scale of positive impacts according to their importance.

Decision no. 598, dated 1.7.2015 "On Defining Rules and Procedures for Impact Assessment on the Cross-Border Environment" provides that reports should indicate the potential impacts of projects covering the cross-border environment [9]. It turns out that 84.5% of the reports meet this criterion.

For all of the above it is necessary that forecasting and evaluation be done based on a methodology. Such a methodology is used by only 40% of reports (80 reports). Providing the methodology increases the credibility of the readers of the report for the veracity of the assessment made.

CHARACTERISTICS OF ENVIRONMENTAL IMPACTS	PERCENTAGE OF REPORTS	NR. OF REP.
Are data provided on the duration of environmental impacts?	83	166
Are data provided on the spatial extent of environmental impacts?	88.5	177
Has an assessment of the significance of the impacts been made?	47	94
Are the expected positive impacts of the project given?	77	154
Is information provided on potential impacts on the transboundary environment?	84.5	169
Is the methodology used to predict and assess environmental impacts described?	40	80

Figure 8. Characteristics of environmental impacts

3.8. Environmental monitoring and management

Periodic monitoring of various environmental components is important to highlight the real impact of a development activity and serves to guide the undertaking of mitigation measures (implementation of the management plan).

In themselves these two aspects of EIA are probably the most important. Nevertheless, from the data of this study, it results that almost 1 in 2 reports do not contain a complete environmental monitoring plan. Many reports present the monitoring plan without indicating which environmental components will be monitored, who will monitor them, the frequency of monitoring, where and how these monitoring will be performed. Often the monitoring plan does not include all the indicators that need to be monitored for a proper environmental impact assessment. Indicators are essential environmental components that are used to assess environmental trends, certain phenomena, continuous monitoring, achievements related to the fulfillment of objectives or deadlines [5].

Meanwhile, almost all reports contain a management plan or at least list preventive / mitigating / compensatory measures. However, specific components of the management plan are taken into account little (rehabilitation costs and responsibilities) or almost none (reasons for choosing the proposed measures). The same measures are observed between the reports for different categories of projects. The manner of submitting mitigation measures is treated quite well in Decision no. 912, Date 11.11.2015 "On the Approval of the National Methodology of the Environmental Impact Assessment Process" [11].

From the UNDPA study (2018), also, almost all the reviewed EIA reports of HPPs stated that the rehabilitation of the area is necessary. Of these, 65% of the projects had area rehabilitation plans developed within the EIA. However, the field survey showed almost complete lack of rehabilitation works (98.6%) [24].

Proposed mitigation measures should be supported by evidence of suitability and effectiveness, including an illustration of their success and side effects in similar cases. It would be good for the clear commitment of the project developer to implement mitigation and compensatory measures to be expressed according to the timeframes and associated costs [4].

Certain reports envisage in the objectives the drafting of monitoring and management plans, objectives that remain such.

Environmental monitoring and management plans should be presented in tabular form and separated from each other including all necessary elements. A good example is given in appendices 10 and 11 of the document "Environmental and Social Management Framework for Albania" [22].

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MONITORING PROGRAM & MANAGEMENT PLAN	PERCENTAGE OF REPORTS	NR. OF REP.
Does the EIA contain a program / plan for environmental monitoring?	53.5	107
Does the EIA contain an environmental management plan / list of mitigation measures?	95	190
Are the approximate estimated costs for environmental rehabilitation given?	30	60
Are the developer reasons for choosing the proposed mitigation measures explained?	3	6
Are those responsible for implementing mitigation measures clearly defined?	31	62

Figure 9. Environmental monitoring program and management plan in EIAs

3.9. Other aspects

Finally, we present the results of some additional "criteria" of an EIA report, however important.

Thus, only 3 reports, out of 200, address the best available techniques (BAT), which are relevant and usually established at the level of each industrial sector or activity to prevent or reduce emissions and the impact on the environment as a whole [21].

Only 3.5% of the reports make a proper cost-benefit analysis, an analysis which is a determining element in the decision on EIA.

Ecosystem services, a relatively new concept in Albania, are rarely addressed in the assessments (only 3%). According to Diku et al. (2016) a rapid assessment of the services provided by ecosystems (even according to the market value transfer) would result in much higher values of forests, species wealth, tourism, education, science, etc. (The case of the Valbona River) [12].

The case study of HPPs in Valbona River shows findings similar to our study. These findings include deficiencies in the methodology and structure of the EIA, general non-assessment of impacts, superficial analysis of mitigation measures, very general data, without citing any literature source for the data provided. It is very difficult to notice what data is of the expertise itself and what is taken from literature sources or other sources, use of non-comprehensive methodologies [12].

Regarding the determination of the place for disposal of waste generated during project implementation or operation, 91% of them provide information, although only 49 (24.5%) reports determine it at the drafting stage of the EIA. 133 of them state that such a thing will be decided in the future in cooperation with the local government and 18 do not discuss this issue at all.

OTHERS	PERCENTAGE OF REPORTS	NR. OF REP.
Are the best available techniques (BAT) described?	1.5	3
Has the cost-benefit analysis been done?	3.5	7
Are ecosystem services considered?	3	6
Are the locations for the final waste collection defined / discussed?	91	182

Figure 10. Other aspects of value to be addressed in the EIAs

4. Conclusions

The issues that are least considered in the EIAs are the reference of the sources of information used; lack of the methodology followed for report preparation, biodiversity assessment and impact forecasting; consultation with stakeholders or relevant experts; analysis of alternatives about project development; biodiversity assessment; indirect impacts; significance of the impacts; cost-benefit analysis, environmental monitoring, climate change and ecosystem services.

The reasons for this state of EIA reports in Albania are numerous. Except that EIAs are generally drafted by a single person, in many countries, including Albania, they are being undermined by various corrupt practices. Serious problems are the clear conflict of interest between the project proponent and the expert / experts selected for drafting the reports, as well as fraud and falsification in data collection (Williams & Dupuy, 2016).

They, too, are financially costly and time consuming to develop, increasing the overall costs of a project. There is also a risk that an EIA could lead to the rejection or delay of the development of a proposed project if its impacts are assessed to be too serious.

These are probably the main reasons for the lack of serious analysis in EIA reports in Albania, supported by the lack of control by the responsible authorities. EIAs are more likely to represent the interests of the company and highlight the benefits of the project, rather than provide an objective estimate of costs and benefits or recommend against project approval [14]. Since there is no government or independent verification of the data presented in the reports, there is no way to hold experts accountable for the content of the reports [16].

Assessing authorities should conduct field visits to confirm the data presented in the EIA reports, this is rarely or never done. As a result, cases of EIAs were reported that included false data, as well as text and data that were copied and pasted from EIA reports on completely different projects. There are currently hundreds of licensed experts in drafting EIAs in Albania. Under applicable law, if an expert submits three weak EIAs in a row, his license may be revoked by the ministry responsible for environment. However, suspensions or revocations of private expert licenses are said to occur rarely, if at all.

Of concern is the limited public participation in the evaluation process, not to mention the quality of these consultations. Public EIA consultations are required by law to be advertised in the media, which is not done even for very influential projects.

Other problems in the evaluation process we mention: insufficient human resources within public agencies to evaluate draft EIAs, lack of formal sanctions for private experts who consistently present weak EIAs, avoidance by public authorities of the legal obligation to publish project information on their websites.

The Ministry responsible for the environment has the task of drafting annual reports on the implementation of the law on environmental impact assessment, as an obligation of article no. 28 of the latter. These annual reports are missing, or at least not public. Also, the official website of the National Environmental Agency does not publish data for all activities, subjects of the law on environmental impact assessment, as provided by Article 11/3 of this law.

Report on Albania "Impact Assessment - Preventive Measures for Significant Environmental Impacts in the 21st Century" of 2014, to the question whether there is any provision to ensure the quality of the EIA report prepared by the developer, answers as follows: "Report must be prepared by a professional environmental expert, licensed by the NRC, who prepares and signs the report and is responsible for its content". However, accountability is lacking, or there is no functional authority to guarantee it [1]. Moreover, according to Beja 2017, Albanian legislation is not fully aligned with Directive 2014/52 / EU [3].

More complete data are provided for the legislation that supports the assessments, physical characteristics of the development area such as: hydrology, geology, climate (except flora and fauna), data about the project and its location, environmental discharges, to some extent also the social aspects, duration and extent of impacts and environmental management / mitigation measures.

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