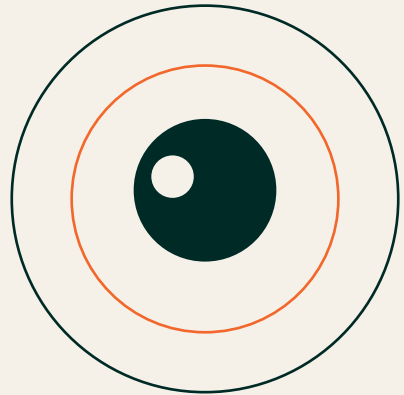




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PAMANCA
Protected Areas Matter Advocating for Nature Conservation in Albania



NATURE'S EYE

**PRACTICAL GUIDE FOR
MONITORING DECISION-MAKING
IN PROTECTED AREAS**

*From Social Media Activism to Legal Action:
How to Protect Nature When Institutions Remain Silent.*

Layout and Design by:
Endpoint



For Local Action Groups (LAGs), environmental CSOs, and any citizen who refuses to be a spectator.

Tables of content

00 Why this guide and How it will help?	8
Why this guide and How it will help?	9
Nature Protection at a Crossroads – Why We Must Remain Vigilant?	11
How to Use This Guide (Orientation Map)	12
10 golden rules of a monitor	13
Policy-making monitoring – What it is?	14
Quick Map: Policy-Making Cycle + Entry Points	15
What we actually monitor	16
<hr/>	
01 The minefield (Law & Institutions)	18
The New Map of Authority: Who Really Makes the Decisions?	19
The Legal Labyrinth: When “Protection” Becomes “Development”	21
Red flags (When to shout “WOLF!”)	22
<hr/>	
02 The monitoring cycle	24
The Policy-Making Cycle & Intervention Points	26
Where and how to intervene (before it’s too late)	30
<hr/>	
03 Monitoring methodology in 8 steps: from concern to an evidence “case file”	38
Preparation:Steps	40

04 Institutional GPS: Who does what in nature conservation	46
Four key roles: policy, implementation, control, justice	48
How to find the correct institution in 3 questions	49
When competences overlap: how to avoid institutional “ping-pong”	50
“Institutional outputs”: what documents they produce (and why you need them)	51

05 Rights in action: information, participation, accountability – toolkit	52
Three pillars: what a good monitor seeks	54
Five standard requests that work almost always	55
What to request by phase: a very simple guide	56
Letters that bite: how to write so you are not ignored	57
Field Matrix (your investigative file)	59

06 How to participate effectively in public consultation (not just “giving an opinion”)	60
Before the consultation: preparation that gives you an advantage	62
During the consultation: how to write comments that “carry weight” and demand a response	63
Public hearings and meetings: how not to let them become a “show”	64
After the consultation: the moment when the process is “tested” for seriousness	65

07 How to turn monitoring into results:

Impact and escalation strategy

66

Three pathways of influence.

Choose the path according to the situation

68

When to escalate signals that it is time

to move to a stronger step

70

Two mini-scenarios: what monitoring looks like in practice

71

08 Template and form pack

74

Ready-to-use models & forms (for LAGs/NGOs)

75

T2 - Monitoring Matrix

76

T3 - Case Chronology (Timeline)

78

T4 - Evidence File Checklist

79

T5 - Information Request (Model 1 – Simple)

80

T6 - Request for Information (Model 2 – Reinforced)

81

T7 - Public Consultation Comment Template

82

T8 - Communication Log

83

T9 - Stakeholder Map

84

T10 - Mini Public Communication Plan (optional)

85

T11 - Administrative Appeal Template

86



Why this guide and how it will help?

- I. Why this guide and How it will help?
- II. Nature Protection at a Crossroads – Why We Must Remain Vigilant?
- III. How to Use This Guide (Orientation Map)
- IV. 10 golden rules of a monitor
- V. Policy-making monitoring – What it is?
- VI. Quick Map: Policy-Making Cycle + Entry Points
- VII. What we actually monitor

Why this guide and How it will help?

Nature conservation in Albania does not depend solely on good will, but on how public decisions are made: how laws and secondary legislation are drafted, how plans are approved, how permits are issued, how implementation is monitored, and how budgets are allocated. This is precisely where most of the process takes place, and it is also where local communities and civil society often remain “outside the room,” without full information and without practical tools to follow the process.

In reality, nature policy is not just an “environmental” issue. It is intertwined with tourism, infrastructure, energy, spatial planning, forestry, water, and agriculture. This means that decisions that appear technical or administrative can have very tangible consequences. They can change land use, increase pressure on sensitive areas, restrict community access, or create standards that look good on paper but in practice are unclear, unenforceable, or weak.

This guide has been prepared to provide LAGs (Local Action Groups) and CSOs that aim to follow, understand, and influence decision-making affecting nature (protected areas, rivers, forests, coastline, biodiversity, hunting/fishing, tourism, aggregates, construction, spatial plans) with a “simple working manual” for monitoring policy-making related to nature conservation.



The goal is not for members of the public to become lawyers or to read every article of the law.

The goal is for them to be able to do three things very well:

1.

identify the document that produces the decision

2.

understand where we are in the policy-making cycle and where they can engage

3.

build a short evidence file that enables them to request transparency, submit meaningful comments, and follow implementation.

The guide is written in simple language and with a practical logic. It shows the key points where the public has the right to be informed and heard, how to request information correctly, how to use public consultation as a real instrument, and how to turn monitoring from an emotional reaction into structured action.

Alongside the individual sections of the Guide, a set of models is included as annexes, providing ready-to-use templates and matrices (information request forms, case timelines, monitoring matrices, communication registers), so that the work becomes repeatable and measurable.

If monitoring is done properly, it produces **two major outcomes**:

01

It increases accountability and transparency, because institutions find it more difficult to make decisions “in silence”

02

It improves the quality of decisions themselves, because structured comments, local evidence, and document-based public pressure make the process more serious.

This guide is an invitation to make civic participation stronger, more precise, and more useful

Not only to oppose, when necessary, but also to improve the rules of the game and protect nature with tools that actually work.

Nature Protection at a Crossroads – Why We Must Remain Vigilant?

Until 2024, the fight for nature was about **designating protected areas**. Now, the fight is to **protect them from “development”**.

Recent legal changes (Law 21/2024) have created a new reality:

- 01 Zoning is no longer sacred:** Through a decision of the National Territorial Council (NTC), a strictly protected zone can be turned into a construction site for “elite tourism”.
- 02 Institutions are fragmented:** Competences are distributed among the Ministry, NAPA (National Agency for Protected Areas), the National Territorial Council (NTC), municipalities, and new structures such as the Office of the Administration of the ‘Vjosa River’ and Alps National Parks (ZAPK/OANP). This institutional “fog” is often used to avoid responsibility.
- 03 Strategic Investments over the Law:** In many cases, the “Strategic Investor” status is being used as a VIP ticket to bypass environmental safeguards.

THE ROLE OF LAGs AND CSOs:

State institutions have the duty to carry out monitoring, but they often lack the capacity or the will. This is where the public and civil society organizations come in as carriers of the public interest. The public is not just an observer, but also an early warning system. When citizens remain silent, nature is lost.

How to use this guide (Orientation Map)

Where is nature calling today? Follow the arrows to find the solution in this Guide.

- 01 Have you seen a construction sign or an excavator in a Protected Area?**
- *No, but I want to know what plans the municipality/government has.* -> **Go to Chapter II (Online Monitoring)**
 - *Yes, and I don't know if they have a permit.* -> **Go to Chapter III (Tools – Request for Information)**
- 02 Is there a notice for a Public Hearing?**
- *Yes, I want to go and speak.* -> **Go to Chapter IV (How to make a submission at a hearing)**
 - *The hearing took place, but no one notified us.* -> **Go to Appendix B (Complaint Template)**
- 03 Is a new Management Plan being prepared for your park?**
- *Yes, and we want to propose activities.* -> **Go to Chapter I (Understand who decides: NAPA or the Municipality)**

REMINDER

This is not an academic legal text. It is a working tool based on findings from analyses of legal gaps and institutional shortcomings. Laws change, but protection principles remain. Use this Guide as a compass, not as a sacred book.

10 golden rules of a monitor

01 ORAL STATEMENTS ARE NOT EVIDENCE.

If it is not written in a document, email, or official minutes, it does not exist. Always request an official document.

02 DEADLINES ARE NON-NEGOTIABLE.

If you have 20 days to appeal, the 21st day is too late. Know the legal timeline.

03 TAKE PHOTOS WITH COORDINATES.

A simple photo is not sufficient in court. Use applications that embed GPS/date data in the image (timestamp).

04 FOLLOW THE MONEY (AND THE NCC).

Major decisions are not taken in the Municipal Council, but in the National Territorial Council (NCC). Monitor its website every week.

05 PUBLIC HEARINGS ARE YOUR “WEAPON”.

Do not go just to listen. Speak, record, and make sure your objection is officially recorded.

06 KNOW YOUR ZONING. Download the Park map.

A hotel in a Sustainable Use Zone is treated differently from one in a Core Zone.

07 UNITY IS POWER. A single activist is ignored.

A coalition with national CSOs and international media can deter abuse.

08 USE YOUR RIGHT TO INFORMATION.

It is the cheapest and most effective tool. Flood institutions with requests. Their silence is evidence of a violation.

09 ENSURE PHYSICAL SAFETY.

Economic interests are significant. Never go alone into conflict zones or suspicious construction sites.

10 DO NOT GIVE UP AFTER THE FIRST REJECTION.

An administrative refusal is standard. The real legal work starts after it.

Policy-making monitoring

- What it is

It is the way communities and civil society:

- follow the decision-making process (were the rules respected?),
- analyse the content (does it protect nature or weaken it?),
- check implementation (is it being implemented as approved?),
- influence decisions to be better, fairer, and enforceable.

BASIC RULE

Do not argue without documents.

To be strong in the process, you need:

- a timeline (when what happened),
- a standard (what the law/planning requires),
- evidence (document/act/official communication).

Quick Map: Policy–Making Cycle + Entry Points

01 Program / Initiative

Where the public enters: identifies the issue, requests transparency, requests basic documents.

02 Drafting

Where the public enters: requests the draft, explanations, impact assessment, and working groups.

03 Public consultation

Where the public enters: submits written comments, requests hearings, requests reasoned responses.

04 Adoption

Where the public enters: follows the process, requests the final act, checks whether comments have been reflected.

05 Implementation (secondary legislation, plans, permits, tenders, inspections)

Where the public enters: monitors permits/plans, inspections, the budget, and implementation conditions.

06 Monitoring & review

Where the public enters: reports problems, requests corrective measures, and files complaints when there are grounds.

What we actually monitor

We monitor **four** issues:

01 The process (rules of the game)

- Was the public notified?
- Was there real consultation?
- Were deadlines respected?
- Were justifications provided?

02 The content (quality of the decision)

- Does it weaken protection standards?
- Does it create legal “loopholes”?
- Does it open doors to uncontrolled development?

03 Implementation (what happens after approval)

- Are secondary acts issued on time?
- Are permits issued in line with the law/plan?
- Are there inspections and enforcement actions?

04 Money and capacity (feasibility)

- Is there a budget for administration/monitoring?
- Is there staff, equipment, and a clear mandate?
- Are there accountability mechanisms?

WHAT WE CALL "EVIDENCE" IN MONITORING

**In monitoring, "evidence" is not only the final document.
Evidence is anything that shows how a decision was made.**

Typical evidence (strongest):

- decisions (Council of Ministers, municipality, various authorities)
- secondary legislation (orders, instructions, regulations) official
- notices for public consultation procesverbal, attendance lists,
- presentations
- plans (management, spatial, development)
- permits (environmental, construction, exploitation)
- monitoring/inspection reports
- contracts/tenders when related to nature

Supporting evidence (but still useful)

- dated photos/videos (with location)
- residents' statements (written, when necessary)
- media articles (as indications, not final proof)
- official correspondence (emails/letters)

01

The minefield (Law & Institutions)

- I. The New Map of Authority: Who Really Makes the Decisions?
- II. The Legal Labyrinth: When “Protection” Becomes “Development”
- III. Red flags (When to shout “WOLF!”)

The New Map of Authority: Who Really Makes the Decisions?

Until recently, the primary point of contact for matters concerning protected areas was the Ministry of Environment or the National Agency of Protected Areas (NAPA). Today, however, the landscape has changed. Following the 2024 amendments (Law No. 21/2024), the center of gravity has shifted from “environmental experts” to “territorial planning authorities.”

This is the new power structure that every activist should keep in mind:

01 NTC (National Territorial Council) – The “Super Decision-Maker”

Its new role: Today, the NTC has emerged as the most powerful actor in the system. It no longer approves only general planning instruments, but has also assumed an executive role in approving specific projects within Protected Areas (PAs).

Key competence: The NTC approves the “technical rules and criteria” governing tourist resorts and infrastructure developments within Protected Areas. If the NTC gives the green light to a strategic project, other environmental permits risk becoming little more than formalities.

What to monitor: NTC decisions constitute the first – and most critical – filter for any large-scale development project.

02 The Ministry of Tourism and Environment – The “Political Architect”

Role: The Ministry is responsible for proposing the designation or removal of protected status for areas, as well as approving management plans.

Important note: The Ministry now also holds the power to propose changes to the “technical-formal elements” of protected areas – including their boundaries and internal zoning – through new procedures that are often driven by investment interests.

03 NAPA (National Agency of Protected Areas) – The “Weakened Technician”

The reality: Once considered the principal guardian of protected areas, NAPA’s role has gradually been reduced to largely technical and consultative functions. The Agency may issue opinions and recommendations, but in cases involving “Strategic Investments” or decisions adopted by the NTC, its ability to exercise an effective veto is extremely limited.

04 The New Local Players: Municipalities and OANPs Office of the Administration of the ‘National Parks

Municipalities: Development Interest or Environmental Protection? Municipalities have assumed a greater role in the administration of certain protected areas, particularly municipal natural parks.

The risk: Pressure to increase local revenues may encourage municipalities to issue construction or exploitation permits in environmentally sensitive areas, often at the expense of ecological criteria. The lack of technical capacity within local governments to properly assess environmental impacts represents a critical gap – one that has reached alarming levels.

OANPs (Office of the Administration of the National Parks) These are newly established structures dedicated to the administration of individual National Parks.

The positive side: They may provide a more focused and specialized approach to the management of each specific park.

The downside: They also introduce institutional fragmentation. Regional Protected Area Administrations (RPAs) lose direct control over the parks, while the newly created NPAMOs may struggle to secure sufficient technical expertise and ensure coordination at both the local and central levels.

The Legal Labyrinth: When “Protection” Becomes “Development”

Law No. 81/2017 underwent profound amendments in 2024. Activists must understand that key terms no longer carry the same meaning they once did.

ARTICLE 33: THE “TROJAN HORSE” OF CONCRETE DEVELOPMENT:

*This is the single most critical provision that activists must monitor. It has fundamentally reversed the governing logic – from “**prohibited unless explicitly permitted**” to “**permitted in principle**”.*

What is now allowed? The amended law explicitly authorizes “**high-end tourism**” (including five-star resorts), agritourism, and the supporting infrastructure associated with such developments within Protected Areas – regardless of whether these activities were foreseen in the park’s management plan.

The risk: An investor may now be able to construct a luxury hotel in the heart of a National Park by relying directly on the law itself, without first having to amend the park’s zoning regime.

Inverted Hierarchy:

In theory, the Law on Protected Areas should hold supreme authority. In practice, however, sectoral legislation has progressively eroded its primacy.

- **Strategic Investment Law:** Introduces fast-track procedures that often bypass standard environmental safeguards and review mechanisms.
- **“Mountain Package” (Law No. 20/2025):** frames forests and mountainous land as economic assets eligible for lease arrangements (e.g., symbolic “€1 leases”) for development purposes, increasing the risk of habitat fragmentation and long-term ecological degradation.

RED FLAGS

(When to shout “WOLF!”)

As a monitor, if you see these signals in the Official Gazette or on the ground, immediate attention is required:

RED FLAG 01

Change of “Technical–Formal Elements”:

If you encounter a proposal to modify the internal zoning of a park, or to alter the technical-formal elements of a protected landscape, this is often used to open the way for construction that was previously prohibited.

RED FLAG 02

NTC Decision on “Special Regulations”:

If the National Territorial Council approves specific building rules for a protected area, this is an early warning sign that construction activity is being enabled.

RED FLAG 03

Absence of a “Buffer Zone”

The new law has removed the requirement for buffer zones around Nature Monuments. If excavation works appear next to a cave or waterfall, they may be legally “compliant,” even though the environmental damage is effectively unavoidable.

02

The monitoring cycle

- I. The Policy-Making Cycle & Intervention Points
- II. Where and how to intervene (before it's too late)

Most environmental protests in Albania begin when citizens see excavators on site. At that point, the battle is already about 90% lost – decisions were made months or even years earlier.

This chapter is designed to help you reverse the timeline and intervene at the critical points where projects can still be stopped or significantly improved. The goal is to move from reactive action (“when the excavator arrives,” which is late and costly) to early prevention (“when the signature is still being placed,” which is far more effective).

This section functions as a practical roadmap, showing which stage a project is in at any given moment and what can realistically be done at each step.

The Policy-Making Cycle & Intervention Points

01 Idea / Initiative: When an Issue Enters the Radar

This is the stage where:

- a problem first comes to public or institutional attention,
- an institution begins discussing possible changes,
- or an economic interest starts pushing for new decisions.

What LAG/CSO does (in practice)

- identifies the issue (one sentence) and the risk (one sentence)
- requests basic information: is there a plan? is there a project? is there an initiating decision?
- collects local data: what is affected, who is affected, when it will be affected

Mini-checklist (Initiative Stage)

- Do we know who initiated the proposal?
- Is there an official initiating document?
- Is there a defined timeline or expected schedule?

02 Drafting: where the “text” and logic of the decision are shaped

At this stage, the actual document is written (law, act, or plan). It is often the least visible phase for the public, as work takes place in working groups and communication is limited.

What you should request (specifically)

- the draft document (latest version)
- the explanatory note (why the change is being made)
- the impact assessment (when available)
- the composition of the working group / consultants (when applicable)
- supporting reference documents (studies, plans, reports)

What LAG/CSO does

- formally requests documents in writing (do not rely only on public announcements)
- prepares a one-page position paper (problem + key demands)
identifies local experts/academics for a rapid assessment

“Testi i sinqeritetit”

Nëse s’ka as draft, as relacion, as dokumente shoqëruese, nisma është e dobët ose e errët. Kjo është pikë presioni: “publikoni bazën e nismës”.

THE SINCERITY TEST

If there is no draft, no explanatory note, and no supporting documents, the initiative is either weakly grounded or intentionally opaque. This becomes a pressure point: **“publish the basis of the initiative.”**

03 Public Consultation: the main participation tool

Public consultation is meaningful only when:

- the public has access to the documents
- there is sufficient time to review them
- and institutions respond with reasoned feedback.

How to use consultation as a CSO

- write structured comments (not essays)
- make measurable requests (amend Article X, add restriction Y, clarify procedure Z)
- request reasoned responses (why something is accepted or rejected)

Mini-checklist (Consultation)

- Are all relevant documents published?
- Is the deadline reasonable?
- Is there a formal channel for submitting comments?
- Is a report on how comments were addressed expected?

04 Approval: what happens when the document is “closed”

This is the stage where the decision becomes official: the law, act, or planning instrument is formally adopted.

What LAG/CSO does

- secures the final version (not the draft or preliminary one in circulation)
- checks whether public comments were actually reflected or ignored
- requests publication of supporting documents when they are missing

CRITICAL DISTINCTION

Approval is not the end of the process. Many of the most significant impacts occur at the implementation stage (permits, exemptions, secondary legislation, and local planning instruments).

05 Implementation: where permits, plans, tenders, and inspections emerge

Implementation is the stage where a decision is translated into:

- secondary regulations and by-laws,
- concrete permits,
- on-the-ground activities,
- investments and contracts,
- inspections and enforcement actions (or lack thereof).

What you monitor in practice

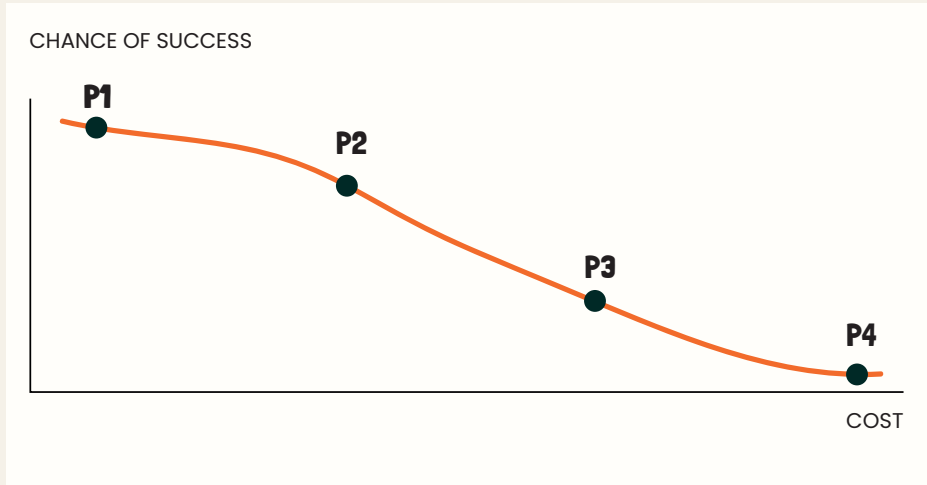
- whether implementing acts have been issued
- whether permits are being granted in line with the plan/zoning rules
- whether inspections are actually carried out, and whether fines or suspensions are applied when required
- whether the budget is being used according to its intended purpose

Mini-checklist (Implementation)

- Which institution is issuing the permit?
- What are the permit conditions (in writing)?
- How will compliance be verified on the ground?

Where and how to intervene (before it's too late)

The earlier you intervene, the lower the cost and the higher the chance of success.



P1 Idea / Initiative (NTC / Ministry)

Cost of opposition: 0 Lekë (email / advocacy). Chance of success: **HIGH**

P2 EIA & Environmental Permit

Cost: Low (expert input) Chance of success: **MEDIUM**

P3 Construction Permit

Cost: High (court action) Chance of success: **DIFFICULT**

P4 Start of Works

Cost: Very high (protests / confrontation) Chance of success: **MINIMAL**

PHASE 1 – early radar

(News hunting)

Large-scale projects do not appear overnight. They leave digital traces long before they reach the ground.

01 NTC Acts – Primary Source No. 1

Decisions regarding resorts in protected areas are taken here.

Action: Monitor the website of the Agjencia Kombëtare e Planifikimit të Territorit once a month- <https://planifikimi.gov.al/index.php?id=home>, you can also check the Agjencia e Zhvillimit të Territorit- <https://azht.gov.al/> once a month.

What to look for: agenda/project lists. Search for the list of projects included in the agenda. These are often disguised under technical labels such as “agritourism complex in parcel X,” which may in reality refer to a resort development in a protected area.

02 Strategic Investment Registers

(AIDA - <https://aida.gov.al/>, Albanian Investment Corporation - <https://www.aicorporation.al/sq>, SASPAK - <https://saspac.gov.al/>)

Many projects along the coast or in protected areas are granted “Strategic” status to move through procedures more quickly.

Signal: If a decision by the Strategic Investment Committee (KIS) appears, it indicates that the government has given political approval or backing for the project.

03 Municipal Notices (Municipal Council)

For smaller local projects (quarries, small hydropower plants, access roads).

Action: Monitor Municipal Council meetings. This is where land-use changes are approved (e.g., from forest/pasture land to construction land).

PRO TIP

Don't wait for official announcements.

Set up Google Alerts using keywords such as: “Park [Name]”, “Resort [Area Name]”, “Investment [Village Name]”.

PHASE 2 – EIA: “Achilles’ heel” of projects

Environmental Impact Assessments (EIA) are often the weakest link in the process. In many cases, EIAs are “copy-paste” documents and purely formal. This is where inconsistencies can be exposed.

How to deconstruct an EIA report

Don't be intimidated by technical language.

Look for these three critical flaws:

- 01 “Copy-Paste” syndrome** Many environmental consultancies reuse text from older projects.

What to check: Do the report mention rivers, villages, or geographic features that are not present in your area? Are there species listed that do not actually exist locally? (There have been cases where EIAs for the mountains mentioned sea turtles.) Such inconsistencies indicate the study is unreliable or fabricated.

- 02 Wrong season** Was the flora and fauna survey conducted in winter, when plants are dormant and animal activity is minimal?

Legal principle: The assessment must cover full biological cycles. A 5-day field study cannot adequately represent a full year of biodiversity.

- 03 Missing alternatives** The law requires the EIA to include a “Zero Alternative” (i.e., not implementing the project) and other feasible options.

Violation: If the report only states that “the project is excellent” without analyzing and comparing alternative scenarios, it is incomplete and does not meet the required methodological standard.

Preliminary EIA vs. Full (In-depth) EIA

Below is the key difference between the two procedures, with a focus on public participation and legal room for action.

Lloji	When needed?	A ka dëgjesë?	Risk / Opportunities
Preliminary EIA	Small- and Medium-Scale Projects.	Not always (it is often overlooked in documentation).	May go unnoticed (High procedural risk).
Detailed EIA	Hydropower Plants, Large Resorts, Airports	YES (Mandatory)	A key opportunity for public opposition.

DANGER

Preliminary EIA is often overlooked on paper (high procedural risk).
Potential: In-Depth EIA = golden opportunity for opposition.

PHASE 3 – Public consultation (theater or reality?)

The law (and the Aarhus Convention) requires institutions to consult the community. In practice, however, public hearings are often conducted merely as a formality to complete the administrative file.
How can you turn the process to your advantage?

01 Before the Public Hearing: Documenting the Notice

Was the public notified 20 days in advance?
Was the notice posted at the municipality/administrative unit offices?

Action: If not, take photos of the empty notice boards. This serves as procedural evidence that can be used to challenge and overturn the decision in court.

02 During the Public Hearing: Don't Be Passive Spectators

Do not sit silently at the back of the room.

Request access to the official minutes of the meeting. Make sure that every objection or comment you raise is formally recorded.

If officials say, "This will be addressed later," insist by stating: "I want it recorded in the minutes that my question/request was not answered."

03 After the Public Hearing: "The Written Trail" – Words are carried away by the wind

Submit your comments in writing (email or postal mail) within the deadline. The institution has a legal obligation to respond to you with a justification for the acceptance or rejection of your comments. Failure to provide such justification can render the environmental permit legally invalid.

RECORD EVERYTHING!

You have the right to record audio and video during public hearings. It is a public activity. The presence of a camera often makes officials more accountable.

PHASE 4 – permits and On-site monitoring

If the project has passed the previous stages, it is now issued an Environmental Permit and a Development/Construction Permit.

What should you monitor now?

01 Environmental Permit Conditions

An Environmental Permit is not simply a “YES.” It includes a list of binding conditions (e.g., “No night-time construction,” “No dumping of debris into rivers,” “Site must be fenced,” “Waste must be properly managed”).

Your task: Obtain a copy of the permit. Go on site. Are the conditions being respected? If not -> file a complaint with the Territorial Inspectorate (IKMT) and the Police

02 Site Information Board

Every construction site must display a visible information board including:
Building permit number
Duration of the works
Implementing contractor
Missing site board = Illegal construction. Call 112 or notify IKMT.

03 Environmental Crime

If you observe irreversible environmental damage (such as large-scale deforestation or river pollution):
This is no longer an administrative issue. It is a criminal offense.

Refer to the Penal Code. File a criminal complaint with the Prosecutor’s Office.

MONITORING CHECKLIST

Before taking action, make sure you have collected all the facts.

Basic Documentation:

- Have you obtained the KKT/Municipality decision for the project?
- Do you have a copy of the Environmental Impact Assessment (EIA) report?
- Do you have the Environmental Permit with its corresponding conditions?

Procedures:

- Was the public hearing notification period respected?
- Have you submitted written comments?
- Have you received a reasoned response?

On-Site Monitoring:

- Is there a site information board displayed?
- Are the project boundaries (coordinates) being respected?
- Do you have dated photos/videos of any violations?

03

Monitoring methodology in 8 steps: from concern to an evidence “case file”

I. Preparation:Steps

The idea of this chapter is simple: every monitoring case (from a draft law to a specific permit on the ground) can be approached using the same working method. Instead of scattered reactions, a repeatable and measurable process is built.

Target outcome: a concise, clear “monitoring dossier” supported by documentation, which allows you to:

- request transparency,
- submit substantive comments,
- demand corrective measures,
- and (when necessary) pursue administrative or legal action.

THE 1-HOUR RULE

If within 1 hour you cannot summarise the case in 10 lines + 5 key supporting documents, then you have not yet properly “grasped” the issue. Go back to Steps 1–4.

Preparation: Steps

Finding the issue, the standard, the decision-making, and the documents.

Step 01 Define the issue and set the objective (not just the problem)

Many cases may appear complex, but monitoring works only when you make the issue manageable.

1.1 Formulate the issue in one sentence

- “A regulatory change is being proposed that facilitates activities in a sensitive area.”
- “A permit is being issued / works are starting on a river segment.”
- “A development plan is being approved without supporting documentation.”

1.2 Set the monitoring objective (what you want to achieve)

Typical good objectives include:

- “To ensure full publication of all documents and a meaningful public consultation.”
- “To clarify restrictions and protection standards in the final text.”
- “To halt the activity until legal requirements are fulfilled.”
- “To establish enforcement and monitoring measures.”

MINI-CHECKLIST (STEP 1)

- Have I formulated the issue in one sentence?
- Do I have a measurable objective (publication/change/stop/conditions)?
- Do I know who is affected (nature + community)?

Step 02 Define the “standard”: what should have happened

Without a standard, there is no argument. The standard can be:

- a law / secondary legislation,
- a management or zoning plan,
- a procedure (consultation, transparency, deadlines),
- a permit condition,
- or a minimum environmental protection requirement (e.g., sensitive area, species, season).

How to find the standard quickly

- Start from the document closest to the issue (e.g. protected area regulation / spatial plan / permit).
- Look for the article/paragraph that sets a prohibition, restriction, criterion, or procedure.
- Extract and note only 3–5 key standard points (not 30).

THE “3-POINT” MINIMUM STANDARD

Even when you do not have all sources, aim to identify:

- A procedural standard (e.g. transparency / public consultation),
- A protection standard (e.g. restriction in a zone / on an activity),
- An enforcement standard (e.g. permit condition / inspection requirement).

Step 03 Identify the decision-making point: where the real decision is made

Often the “issue” is visible on the ground, but the decision is made on paper. You need to identify:

- which institution takes the decision,
- what type of act it is (decision, permit, plan, instruction),
- and at which stage you are (before/after approval).

Questions that lead you to the decision-making point

- Who signs the act/permit/plan?
- Where is it published (if it is published at all)?
- What is the approval process (who proposes, who approves)?

MINI-CHECKLIST (STEP 3)

- Do I know the competent institution?
- Do I know the type of document I am looking for?
- Do I know which stage of the process we are in?

Step 04 Collect the documents: 5 documents that change everything

At the beginning, you do not need “everything.” You need the key documents that open the case file.

- The core document (draft/decision/permit/plan)
- The explanatory report/justification (why it is being done)
- Supporting documents (study/report/plan)
- Process evidence (consultation notice/minutes)
- Final version or official status (current stage)

How to obtain them: request precise information + public sources + clarification requests (when there is institutional ping-pong).

“REQUEST THE DOCUMENT, NOT THE OPINION”

Do not ask for general explanations.
Request specific documents and deadlines.

Step 05 Build the timeline (chronology): the most underestimated tool

A timeline makes a case much harder to dispute because it shows:

- when the process started,
- when documents were published (or hidden),
- when consultation took place,
- when approval was granted,
- and what actually happened on the ground.

Minimal timeline (6 lines)

- Date – Event – Institution – Document – Meaning – Action

MINI-CHECKLIST (STEP 5)

- Do I have the key dates?
- Have I linked each date to a document?
- Have I marked the “gaps” (missing notice, missing deadline, missing justification)?

Step 06 Analyze the impact (environmental + social) with a fact-based focus

Here you do not need an academic report. You need a short, evidence-based analysis:

- What is affected in nature (habitat, river, forest, coastline, species, seasonal cycles)?
- What is affected in the community (water, land, local tourism, income, safety)?
- What is irreversible if the activity continues?

Practical output: 1-page “key findings” + 3–7 pieces of evidence.

Step 07 Take action: choose the right tool (not all at once)

Main tools:

- structured comments in the public consultation
- request for transparency / completion of missing documents,
- institutional meeting/communication (with official minutes),
- public communication (media/social) based on documented facts,
- local coalition (residents + experts + NGOs).

THE “ONE MESSAGE, THREE REQUESTS” PRINCIPLE

Every communication (with institutions or the public) should include:

- The main message (1 sentence),
- 3 concrete (measurable) requests,
- 3 key pieces of evidence (documents).

Step 08 Follow up: don't let the case die

Monitoring fails when you stop after the first letter. Follow-up means:

- clear deadlines (“I request a response within...”),
- formal reminders if there is no reply,
- request for corrective measures when violations are identified,
- and, when necessary, escalation/complaints.

MINI-CHECKLIST (STEP 8)

- Have I set a response deadline?
- Do I have a follow-up plan (reminder -> escalation -> appeal)?
- Have I kept all communication evidence?

FINAL MONITORING FILE (MINIMUM DOSSIER FOR ANY CASE)

At the end of this process, aim to have:


- A 1-page “case summary” (what it is, where we are, why it matters)
- The timeline (chronology)
- 5–10 key documents (PDF/link + date + source)
- A 1-page “findings and requests” (3–7 findings + 3 requests)
- A communication log (emails/letters/meetings)

This dossier becomes the foundation for any next step:
public consultation, institutional dialogue, public pressure, or legal appeal.

04

Institutional GPS: Who does what in nature conservation

- I. Four key roles: policy, implementation, control, justice
- II. How to find the correct institution in 3 questions
- III. When competences overlap: how to avoid institutional “ping-pong”
- IV. “Institutional outputs”: what documents they produce (and why you need them)



Monitoring becomes difficult when you don't know "who holds the decision-making power." In Albania, decisions related to nature often pass through several institutions and levels at the same time. This chapter provides a practical map of roles, so you don't waste time addressing the wrong institution.

Four key roles: policy, implementation, control, justice

01 Policy INSTITUTIONS (set the direction)

Këtu hartohen ose shtyhen ndryshime ligjore, strategji dhe politika kombëtare. Zakonisht janë ministritë dhe strukturat qendrore që propozojnë dhe koordinojnë.

What to monitor here:

- Are there new initiatives?
 - Are supporting documents available?
 - Is there meaningful public consultation?
-

02 IMPLEMENTATION INSTITUTIONS (turn policy into action)

These include the administrative bodies that operate on the ground, implement plans, issue operational authorizations, and organize activities.

What to monitor here:

- Are there management plans in place?
 - Are the rules being enforced on the ground?
 - Is there sufficient capacity, budget, and staff?
-

03 Control / INSPECTION INSTITUTIONS (verify and enforce sanctions)

This includes inspections, verifications, administrative measures, fines, and suspensions.

What to monitor here:

- Are there real inspections taking place?
 - Are enforcement measures properly documented?
 - Is the same standard applied to everyone?
-

04 APPEAL and JUSTICE mechanisms (when the normal process fails)

When the system does not function properly, this is where correction is sought: administrative complaints, the Ombudsman, and courts (when there is legal basis).

What to monitor here:

- Was the complaint handled within the deadline?
- Is there a reasoned response?
- Were corrective measures taken?

Who signs?

When you identify a problem, do not ask “who is generally responsible.”
Instead ask:

“Who signed the act?” / “Who issued the permit?” / “Who carries out the inspection?”

How to find the correct institution in 3 questions

01 Is this a policy decision (rule/change) or an implementation decision (permit/plan)?

- **Policy** -> go to the institution that drafts and proposes.
 - **Implementation** -> go to the institution that issues permits, approves plans, or manages territory.
-

02 Is it a “pre-approval” or “post-approval” issue?

- **Pre-approval** -> focus on documents, consultation, transparency.
 - **Post-approval** -> focus on implementation, permits, inspections, budget.
-

03 Is it a request for information or a request for action/intervention?

- **Information** -> formal request for documents.
 - **Action** -> complaint/report/escalation based on evidence.
-

THE CLASSIC MISTAKE

Many groups send letters “just in case” to multiple institutions. This dilutes focus and weakens impact. It is better to send one precise request to the correct institution, using CC only when it makes strategic sense.

When competences overlap: how to avoid institutional “ping-pong”

In practice, an institution might tell you:

“It’s not us, it’s the other one.” This is common when it comes to environmental matters and protected areas, especially when:

- multiple laws apply to the same territory,
- there are central and local levels of governance,
- and institutions have closely related roles (policy, implementation, control).

What a good monitor does:

- Requests a written clarification: “Which institution is competent and on what legal basis?”
- Requests a reference: which law/article is used to deny competence.
- Brings the focus back to “who signs”: requests the act number and the responsible authority.
- Keeps a chronology of responses — a “communication log.”

PRACTICAL BOX – THE QUESTION THAT STOPS INSTITUTIONAL PING-PONG

“Please formally direct us to the competent institution, citing the legal basis, and forward our request on competence if necessary.”

“Institutional outputs”: what documents they produce (and why you need them)

For monitoring purposes, an institution can be identified through the “traces” it leaves behind. These are the documents that are typically requested:

- **Policy / ministries:** draft acts, explanatory reports, work programmes, public consultation notices, reports on how comments were addressed.
- **Implementation / administration:** management plans, operational plans, authorizations, internal guidelines, activity reports.
- **Permits & concrete decision-making:** permits, conditions, deadlines, approval/suspension decisions.
- **Control / inspection:** inspection plans, official minutes, administrative measures, fines, suspension/stop orders.
- **Public budget & finance:** annual budgets, expenditure lines, investment projects, implementation reports.

Once you know which document you are looking for, the process becomes clearer: either the institution has the document and must provide it, or the refusal itself becomes a subject of monitoring.

“QUICK LIST”


When starting a case, aim to secure at minimum:

- the core document,
- the justification/explanatory report,
- the consultation process documents,
- the final act,
- implementation acts/permits,
- control/inspection evidence (when available).

05

Rights in action: information, participation, accountability – toolkit

- I. Three pillars: what a good monitor seeks
- II. Five standard requests that work almost always
- III. What to request by phase: a very simple guide
- IV. Letters that bite: how to write so you are not ignored
- V. Field Matrix (your investigative file)



In Albania, nature protection is directly linked to the public's right to know, to be heard, and to demand accountability. These are not abstract ideas. They are practical tools used whenever there is a draft law, plan, permit, project, or decision affecting the environment.

This chapter does not aim to make you memorize the law. It aims to give you a way of working – how to turn rights into precise requests, documents, and concrete actions.

Three pillars: what a good monitor seeks

01 The right to information

Without information, there is no monitoring. Access to information means:

- obtaining existing documents (not just announcements),
- understanding who holds these documents,
- and receiving them in time, before the decision is finalized.

What an NGO/local group typically requests:

- the draft and its versions (if more than one exists),
 - the explanatory note/justification of the initiative,
 - supporting documents (studies, reports, plans),
 - minutes of consultations/public hearings,
 - the final decision and implementing acts.
-

02 The right to participation

Participation is not simply “giving an opinion.” It means intervening in the process in a way that:

- ensures comments are formally recorded,
 - ensures comments are structured,
 - and requires a reasoned response from the authorities.
-

03 The right to accountability

When the process is not transparent, or when a decision violates standards, the public has the right to:

- request explanations,
 - request corrective measures,
 - and, when necessary, pursue administrative and legal remedies.
-

THE “DOCUMENT–JUSTIFICATION–ACTION” PRINCIPLE

At every step, ask:

- What is the document?
- Where is the justification?
- What is my next action?

Five standard requests that work almost always

These are practical formulations that can be used in letters/emails, without entering into theoretical debate.

01 Request for the core document

“Please provide the document/draft/decision related to ... (topic), as well as any supporting documents that served as its basis.”

02 Request for process information

“Please inform me about the current stage of the process, the upcoming deadlines, and how the public can participate.”

03 Request for meaningful consultation

“Please publish/communicate all consultation materials and ensure a reasonable timeframe for comments, with a clear submission channel.”

Request for a reasoned response

04

“Please provide a written response explaining how public comments were addressed and the justification for their acceptance or rejection.”

Request for implementation and control information

05

“Please provide information on implementing acts, permits issued (if any), inspections carried out, and measures taken.”

HOW TO BE PRECISE

A good request includes: the topic, the time period (e.g. the last 12 months), the competent institution, and a list of documents (3–7 points).

What to request by phase: a very simple guide

When we are at the initiative stage:

- draft + explanatory report + reference documents + working group (if any)

When we are at the public consultation stage:

- official notice + all materials + submission method + deadlines + hearing minutes

When we are at the approval stage:

- final act + approval date + publication source + changes from the draft

When we are at the implementation stage:

- secondary acts + permits + permit conditions + inspections + enforcement measures + budget

THE “ABSENCE TEST”

If supporting documents (explanatory report, studies, justification) are missing, this is in itself a monitoring finding – indicating that the process is weak or unclear.

Letters that bite: how to write so you are not ignored

Institutions are used to ignoring emotional complaints. But they do take formally registered, legally grounded letters seriously. In the following section you will learn the art of “letter-based accountability”: how to ask questions that cannot be avoided, and how to write objections that can be used in court.

How to use Law No. 119/2014

The right to information is your cheapest tool. But you need to know how to “load the magazine” properly.

MISTAKE 01

Asking questions instead of making requests.

MISTAKE

“Why are you destroying our river?”

(This is a rhetorical question; there is no legal obligation to respond).

CORRECT:

“I request a copy of the Environmental Permit and the Technical Report for project X.”

(This is a formal request for an official document).

MISTAKE 02

Being vague.

MISTAKE

“I want information about the park.”

CORRECT:

“I request the Municipal Council decisions for the [Name] area from 01.01.2025 to the present date.”

How to write “comments” in public hearings

When attending a public consultation or submitting written comments, forget poetic language. Use the language of “violations.”

STRUCTURE OF AN EFFECTIVE OBJECTION:

FACT: “In the EIA Report, page 12, it states that there are no endangered species.”

EVIDENCE: “We possess studies (attached) confirming the presence of the Eurasian lynx (*Lynx lynx*) in this parcel.”

LAW: “This is in contradiction with the Law on Protected Areas and the Habitats Directive.”

REQUEST: “We request a revision of the EIA or cancellation of the project.”

WHAT TO LOOK FOR IN AN EIA REPORT TO CHALLENGE IT:

- Are there specific field survey dates? (If it only says “surveyed” without dates, it is questionable.)
- Are water resources mentioned? (Ignoring groundwater sources is a common red flag.)
- Has the opinion of the local community been included? (If not, this may violate the Aarhus Convention.)

Field Matrix

(your investigative file)

Kur dilni në terren për të monitoruar një kantier të dyshimtë, plotësoni këtë skedë. Kjo skedë shërben si bazë për denoncim në IKMT ose Prokurori.

ELEMENT	OBSERVATION (Yes/No/Details)	EVIDENCE (Photo/Video)
Date and time	25.06.2025, 10:30 AM	(Time-stamped photos)
Construction site board	Does it exist? Is it complete?	Photo of the site information board
GPS Coordinates	Lat: 40.XXXX, Long: 19.XXXX	Screenshot i Harts
State of River/ Land	Is there water turbidity? Any tree cutting?	Before/after photos
Construction Equipment	Truck /excavator license plates	Photos of vehicle license plates
Witnesses	Names of residents willing to speak	(Contacts)

06

How to participate effectively in public consultation (not just “giving an opinion”)

- I. Before the consultation: preparation that gives you an advantage
- II. During the consultation: how to write comments that “carry weight” and demand a response
- III. Public hearings and meetings: how not to let them become a “show”
- IV. After the consultation: the moment when the process is “tested” for seriousness

Public consultation is the moment when a decision-making process must be opened to the public. In practice, it is often done formally: short notices, partial documents, tight deadlines, and generic responses. This does not invalidate the consultation, but it makes it more difficult. An organised NGO/local group can turn consultation from a ritual into a real instrument.

This chapter shows how to use public consultation in three phases: **before, during, and after.**

Before the consultation: preparation that gives you an advantage

01 Before writing a single comment, request:

Before writing a single comment, request:

- the draft/current version,
- the explanatory report/justification,
- supporting documents (studies, reports, plans),
- clarification of deadlines and the method for submitting comments.

If documents are missing, your first comment should be:

“Consultation cannot be meaningful without full publication of all materials.”

02 Break the document into “impact points”

Identify:

- 3–5 points that directly affect nature (restrictions, exemptions, zoning, activities),
 - 2–3 procedural points (transparency, implementation, controls),
 - 1 financial/capacity point (budget, staff, responsible institution).
-

03 Prepare a short position (1 page)

- 1 paragraph: what the document is and why it matters
 - 3–7 findings (numbered)
 - 3 concrete (measurable) requests
-

MINI-CHECKLIST (BEFORE THE CONSULTATION)

- Do I have all the materials?
- Do I know the deadline and the official submission address?
- Do I have 3–5 key points to focus on?
- Do I have a 1-page position paper for internal use?

During the consultation: how to write comments that “carry weight” and demand a response

A good comment is not long. It is structured and verifiable.

MINIMUM COMMENT STRUCTURE (THAT ALWAYS WORKS)

For each issue:

- What the draft says (quote 1–2 sentences / article / point)
- Why it is a problem (1–3 sentences, based on logic and facts)
- What the standard is (law/plan/procedure/condition)
- What you are asking for specifically (change/add/remove/clarify)
- What evidence you attach (if any)

Types of stronger requests

- “Add a clear restriction for ...”
- “Clarify the competence: who implements and who monitors?”
- “Set deadlines and responsibilities: within X months, adopt the implementing acts...”
- “Remove the exemption that makes the rule ineffective...”
- “Require publication of the report on how comments were addressed...”



“One comment = one outcome”

Do not mix 10 issues in one paragraph. Separate them into numbered points. Each point must contain a clear, specific request.

How to make it hard to ignore for the institution

At the end of your comments, add a sentence like:

“Please provide a reasoned response on how these comments were addressed, along with the final version of the document, clearly explaining the changes made.”

Public hearings and meetings: how not to let them become a “show”

When there is a public hearing/meeting, the risk is that it remains at the level of statements. To make it useful:

01 Go in with 3 messages and 3 requests

- Main message (1 sentence)
 - 3 concrete (measurable) requests
 - 3 pieces of evidence (documents/facts)
-

02 Demand traceability: minutes, attendance list, presentations

At the end of the public hearing:

- formally request the meeting minutes,
 - request all presented materials,
 - request clarification on next steps and deadlines.
-

03 Don't leave it without follow-up

Send an email/official letter 24–48 hours after the hearing:

- restate the 3 requests,
 - request the documents,
 - request clear deadlines.
-

MINI-CHECKLIST (DURING THE HEARING)

- Did I clearly state the main message?
- Did I make 3 measurable requests?
- Did I request the minutes and materials?
- Did I obtain clarification on next steps and deadlines?

After the consultation: the moment when the process is “tested” for seriousness

After a public consultation, two things can happen:

- either the institutions reflect and improve the text,
- or the consultation is used as a formality and the text proceeds without real changes.

What you should request after submitting comments

- confirmation of receipt (email/registry number),
- the “how comments were addressed” report (if it exists),
- the final version of the document,
- a reasoned explanation of the main accepted/rejected points

How to distinguish a real consultation from a formal one

REAL

comments are addressed with specific responses, the final text shows traceable changes, there is transparency regarding the reasoning behind decisions.

FORMAL

responses are generic (“it was taken into consideration”), there is no report on how comments were handled, the final text is practically unchanged.

What to do if the consultation was formal

- Request in writing an explanation and the report on how comments were handled,
- Request a deadline extension or reopening of the consultation where there is legal basis,
- Inform the public using documents (not labels or opinions),
- Prepare escalation of the case (Chapter 7).

“THREE QUESTIONS AFTER THE CONSULTATION”

- What has actually changed in the text?
- Where is the justification for the rejections?
- What is my next step: dialogue, public pressure, or appeal?

07

How to turn monitoring into results: Impact and escalation strategy

- I. Three pathways of influence. Choose the path according to the situation
- II. When to escalate signals that it is time to move to a stronger step
- III. Two mini-scenarios: what monitoring looks like in practice

Monitoring is not an end in itself. The goal is results: greater transparency, better decisions, stronger environmental protection standards, and real enforcement on the ground. To achieve this, a strategy is needed – when to speak, with whom, how, and when to escalate.

This chapter presents three pathways of influence: institutional, community/public, and administrative/legal. You do not need to use all three. Often, the right combination is institutional + public first; and only when necessary, legal action.

Three pathways of influence. Choose the path according to the situation

01 Institutional influence (structured dialogue)

Use this when:

- the process is still open (draft, consultation, approval),
- there is real room for improvement,
- and you have documents to support your requests.

Main tools

- structured comments,
- requests for clarification of competence/documents,
- meetings with agenda and official minutes,
- concrete proposals (alternative text).

Risk

- wasting time in discussions without a written record.

Solution

- everything in writing + clear deadlines.

02 Community/public influence (document-based pressure)

Use this when:

institutions ignore requests,
the consultation is formal,
or the decision is being pushed forward “in silence.”

Main tools

- public statement with 3 findings + 3 requests + 3 pieces of evidence,
- local media and social networks based on documents (not general accusations),
- community mobilisation (local meetings, structured petition),
- coalition (residents + experts + NGOs).

Golden rule: *Public pressure only works when it is verifiable and focused.*

03 Administrative/legal route (complaints, inspections, court when there is legal basis)

Use this when:

- there are clear procedural or substantive violations,
- there is an immediate risk to nature,
- or the decision is final and its implementation is causing damage.

Main tools

- substantiated administrative complaint,
- request for inspection / enforcement measures,
- escalation to the higher competent authority,
- court action only when there is legal basis and capacity.

THE PRINCIPLE OF PROPORTIONALITY

Do not start with the “big gun” before you are sure you have clear evidence and a defined objective. Start with basic requests, increase pressure gradually, and escalate only when justified.

When to escalate signals that it is time to move to a stronger step

Escalation is appropriate when:

- there is no response within a reasonable deadline,
- responses are generic and evasive,
- documents are withheld without justification,
- consultation is conducted without materials or with impossible deadlines,
- or an on-the-ground activity is progressing and the risk is increasing.

Escalation ladder (practical)

- Initial request (documents/clarification)
- Reminder with deadline (“within X days”)
- Request for corrective measure / reopening of the process
- Escalation to higher-level authority (supervisory institution)
- Structured complaint/report (with a case file)
- Legal action (when there is legal basis and public interest)

“ESCALATION WITHOUT DRAMATIZATION”

The language of escalation should be calm, precise, and document-based:

“Based on the lack of response / missing documents / lack of clarity, we request ... within ...; otherwise, we will proceed with the other legal and administrative remedies provided by law.”

Çfarë duhet të ketë çdo përshkallëzim (minimumi)

- kronologji (3–10 rreshta),
- 3–7 dokumente kyçe,
- 3 gjetje kryesore,
- 3 kërkesa konkrete,
- një afat.

Two mini-scenarios: what monitoring looks like in practice

SCENARIO 01

Amendment of an act/law affecting nature protection

Typical situation: a draft is published that changes the rules of the game (restrictions, prohibitions, permitted activities, competences, tourism, etc.).

How you act (short version)

Step 1: Objective -> "full publication + real consultation + stronger standards"

Step 2: Standard -> existing law/plans + basic protection principles

Step 3-4: Gather documents -> draft, explanatory report, supporting materials

Step 6: Identify risks -> 3 risks (gaps, exemptions, ambiguities)

Step 7: Action -> structured comments + alternative text for key points

Step 8: Follow-up -> request treatment report + final version + track implementing acts

Expected result: increased transparency; improvements in key articles; clearer deadlines/competences for implementation.

SCENARIO 02

Project/intervention on the ground in or near a protected area

Typical situation: construction works appear on site – a tourism project, road, aggregate extraction, river/forest intervention, etc.

How you act (short version)

Step 1: Objective -> “suspension until clarification + transparency + clear conditions”

Step 2: Standard -> zoning/management plan + restrictions + permitting procedures

Step 3: Identify authority -> who signed the permit / who supervises

Step 4: Request documents -> permit, conditions, supporting studies, process records

Step 5: Build timeline + document the site (dated photos/videos)

Step 6: Assess risk -> what is being damaged, what is irreversible

Step 7: Action -> written request for inspection/measure + evidence-based public communication

Step 8: Follow-up -> deadlines + escalation if activity continues

Expected result: real inspection; imposition of conditions; suspension or correction of works; increased transparency regarding permits.

08

Template and form pack

- I. Ready-to-use models & forms (for LAGs/NGOs)
- II. T2 - Monitoring Matrix
- III. T3 - Case Chronology (Timeline)
- IV. T4 - Evidence File Checklist
- V. T5 - Information Request (Model 1 – Simple)
- VI. T6 - Request for Information (Model 2 – Reinforced)
- VII. T7 - Public Consultation Comment Template
- VIII. T8 - Communication Log
- IX. T9 - Stakeholder Map
- X. T10 - Mini Public Communication Plan (optional)
- XI. T11 - Administrative Appeal Template

Ready-to-use models & forms (for LAGs/NGOs)

These models/forms are designed to save time and make monitoring repeatable (not “case by case”). Use them as follows:

- Open T2 (Monitoring Matrix) and write 1 line about the issue.
- Fill in T3 (Case Timeline) while collecting documents.
- Use T4 (Evidence File Checklist) so you don't miss key documents.
- Send T5 or T6 (Information Request) to obtain documents.
- When consultation opens, use T7 (Consultation Comment Template) to write responses that require an official reply.
- Keep T8 (Communication Log) so every email/letter/meeting is traceable.

Golden rule: don't fill everything at the beginning. Start with the minimum and enrich it as new information comes in.

T2 – Monitoring Matrix

Case name/issue title: _____

Location/Area: _____

Start date of monitoring: ____ / ____ / ____

Nr.	What is being monitored? (topic/act/project)	Responsible institution	Key document (title/ no./ link)	Date	Standard (what should have happened)	Suspected issue (short)	Evidence (1-3 item)	Next action	Status
-----	---	-------------------------	------------------------------------	------	---	----------------------------	------------------------	-------------	--------

1

2

3

Key findings (3–7 points):

- 1 _____
- 2 _____
- 3 _____

Key requests (3 measurable requests):

- 1 _____
- 2 _____
- 3 _____

T3 – Case Chronology (Timeline)

Case name: _____

Date	Event / What happened	Who (institution/ person)	Document / Source (no./link)	Why it matters	Our action / Follow- up
------	-----------------------------	---------------------------------	------------------------------------	-------------------	-------------------------------

Identified gaps

(missing documents/deadlines/justification):

T4 – Evidence File Checklist

Mark with when obtained, and note where it is stored (folder/link).

CORE DOCUMENTS

- Draft / initial document
 - Final version of the act/decision
 - Explanatory report (justification: why it is being done)
 - Supporting documents (studies / reports / plans)
-

PROCESS DOCUMENTS

- Public consultation notice
 - Deadlines and method for submitting comments
 - Minutes / attendance lists / presentations
 - Report on treatment of comments (if available)
-

IMPLEMENTATION DOCUMENTS (WHEN APPLICABLE)

- Implementing bylaws
 - Permits/authorizations + permit conditions
 - Management / zoning / operational plans
 - Contracts/tenders (when linked to implementation)
-

CONTROL & FIELD EVIDENCE

- Inspection request / official response
- Inspection report / measures / fines / suspension decisions
- Dated photos/videos (with location)
- Community testimony (written, when needed)

Where the file is stored (folder/link): _____

T5 – Information Request (Model 1 – Simple)

TO [Institution]
SUBJECT: Request for access
to information/documents

Dear Sir/Madam,

In the capacity of [LAG/NGO/resident/representative], we kindly request access to the following information and documentation related to: [topic/act/project], in [area/location], for the period [e.g. last 12 months]:

Please kindly send us the documentation in electronic format (PDF/scan) to the following email address: _____, or advise us on the official procedure for accessing it.

Furthermore, we would appreciate it if you could inform us whether the process is currently in the **drafting, consultation, approval**, or implementation phase, as well as outline the next steps and corresponding deadlines.

Kind regards,
[Full Name]
[Organization / LAG]
[Contact Information]
[Date]

T6 – Request for Information (Model 2 – Reinforced)

Addressed to: [Institution]
Subject: Request for Documents and
Clarification of Competence – [topic]

TDear Sir/Madam,

As part of our monitoring of the decision-making process concerning [topic/act/project] in [area], we kindly request the following:

- Please provide us with the following documents (listed specifically):
 - Main document (draft/decision/permit/plan):

 - Report/justification and accompanying documents:

 - Process-related documents (consultation notice, meeting minutes, review report):

 - Implementation documents (secondary legislation/permits/conditions/accompanying letters)
- Clarification of Competence.
Please officially confirm:
 - which institution is competent for [e.g. issuing the permit / approving the plan / conducting on-site inspections], and
 - on the basis of which legal act/article this competence is determined.

If your institution is not the competent authority, please officially direct us to the competent institution (citing the relevant legal basis) and, if possible, forward our request accordingly.

Kind regards,
[Full Name]
[Organization / LAG]
[Contact Information]
[Date]

T7 – Public Consultation Comment Template

Document under consultation: _____

Institution: _____

Date of submission: ____ / ____ / ____

Dear Sir/Madam,

Within the framework of the public consultation regarding [title of the document], we hereby submit our comments as follows:

1. Comment 1 (Article/Section ___)

What the draft states (brief quotation): _____

The issue (why it is concerning): _____

The standard/legal basis (what it is based on): _____

Our specific request: _____

Evidence / references (if any): _____

2. Comment 2 (Article/Section ___)

What the draft states: _____

The issue: _____

The standard/legal basis: _____

Specific request: _____

Evidence: _____

Conclusion (3 main requests)

1) _____

2) _____

3) _____

Please provide us with a reasoned response regarding the consideration of these comments, as well as the final version of the document, clearly indicating the changes made.

Kind regards,
[Full Name]
[Organization / LAG]
[Contact Information]

T8 – Communication Log

Case Name: _____

Date	Type (email/ letter/ meeting/ phone call)	With whom (institution/ person)	Purpose	Çfarë u tha/u kërkua (shkurt)	What was said/ requested (briefly)	Documents/ Evidence	Follow- up(next steps to be taken)
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T9 – Stakeholder Map

Issue: _____

Actor/ Institution	Role (decides/ implements/ monitors/ influences)	Interests (high/ medium/low)	Positions (supportive/ neutral/ opposed)	Means of engagement (meeting/ comment/ media/ coalition)	Contact person
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Key stakeholders to be engaged within the next 2 weeks:

- 1) _____
- 2) _____
- 3) _____

T10 – Mini Public Communication Plan (optional)

Communication objective: _____

Main audience: community / media / institutions / partners / general public

Key message (1 sentence): _____

THREE REQUESTS (MEASURABLE):

- 1) _____
- 2) _____
- 3) _____

THREE PIECES OF EVIDENCE (DOCUMENTS/FACTS)

- 1) _____
- 2) _____
- 3) _____

Channel & Timing

Channel:

social media post / local media / statement /
press conference / community meeting

Date: ____ / ____ / ____ Responsible person: _____

RISKS & PRECAUTIONS

What we avoid (e.g. allegations without evidence): _____

How we maintain safety and focus: _____

T11 – Administrative Appeal Template

Addressed to: [Name of the competent institution / superior authority]

For information (if applicable): [Institution that issued the act / supervisory authority / Prefect / Municipality]

Subject: Administrative appeal against [Decision/ Permit/Act] no. ____, dated ____, issued by [institution]

Dear Sir/Madam,

I/We, [Name of the appellant / Organization / LAG], with address at [address], contact [email/ phone], hereby submit this administrative appeal against [description of the act, e.g. Decision/ Permit/Authorization] no. ____, dated ____, issued by [institution], concerning [topic/project/activity] in [area/location].

1. Subject of the Appeal and Requests

We request:

- The annulment / amendment / suspension of the above-mentioned act; and/or
- The immediate suspension of the implementation of the act until this appeal has been reviewed (due to the risk of irreversible harm); and
- The reconsideration of the matter with full compliance with procedural requirements and environmental protection standards, as well as the provision of the relevant documentation.

2. Brief Description of the Facts (Chronology)

- [Date]: [event / action]
- [Date]: [issuance of the act/permit / notification / consultation]
- [Date]: [start of implementation on site / consequences]

(See the attached Chronology and supporting documents.)

3. Main Grounds of the Appeal (Findings)

A) Procedural Violations / Lack of Transparency

[e.g. lack of notification/consultation, absence of supporting documents, lack of reasoning, failure to provide information]

B) Substantive Violations / Breach of Environmental Protection Standards

[e.g. non-compliance with zoning/planning regulations, authorization of prohibited activities, ambiguity of conditions, excess of authority]

C) Lack of Reasoning and Proportionality

[e.g. the act does not justify the decision made, does not address risks, does not provide mitigation measures/monitoring]

4. Request for Suspension (in cases of urgency)

Given that the implementation of the act may cause irreversible harm to [habitat/species/river/forest/coastline] and/or serious consequences for the community, we request the immediate suspension of its implementation until the review of this appeal has been completed.

5. Attached Documents (List of Evidence)

- [Act/Permit/Decision no., date]
- [Supporting documents / plan / zoning documentation]
- [Notifications / minutes / official communications]
- [Photos/field reports, if any]
- [Requests for information and responses, if any]

Please notify us in writing regarding the registration of this appeal and your decision-making process and provide us with any additional administrative documents that served as the basis for issuing the act.

Kind regards,

[Full Name]

[Organization / LAG]

[Address]

[Email] - [Phone Number]

Date: ____ / ____ / ____

FINAL NOTE

**When citizens
remain
silent,
nature loses.**

This guide ends here, but the real work begins now. Use these templates, share them with colleagues, adapt them to your specific context, and share your lessons learned with others. Every monitoring case that is successfully concluded becomes part of a much larger change.

