

October 11, 2012

Mr. Niko Nesturi  
Chairman  
"Bredgeti Association" The Coast  
P.O. Box 258  
Tirana, Albania

***Re: Consultations on the World Bank Issue Brief "Governance in Immovable Property Rights in Albania"***

Dear Mr. Nesturi,

Dr. Jim Yong Kim, the President of the World Bank, has requested me to respond to your letter of September 28 regarding immovable property rights in Albania on his behalf.

I would like to thank you for sharing your views during our recent meeting at the World Bank office in Tirana and also for your Association's thorough review of the aforementioned Issue Brief. The World Bank is firmly committed to promoting an open public debate with the involvement of all interested stakeholders on this extremely important issue for Albania's economic development. As the Issue Brief highlights, such a debate is essential to reaching any sustainable solution that will be considered as legitimate by most Albanian citizens.

We understand that you have not been able to obtain a copy of the revised edition of the Issue Brief, which was published on our website in April 2012 and was informed by several discussions that you had with World Bank staff at the Tirana office since the publication of the first edition. We will be publishing and sending you hard copies of the revised edition, which explicitly refers the views of the Bredgeti Association and other civil society groups representing expropriated owners based on our past consultations.

After our meeting, I have once again reviewed the revised edition and ascertained that your views are acknowledged on pages 10 and 20. The Issue Brief also encourages the government to give full attention to the views of diverse stakeholders, including yours, in formulating a way forward.

At the same time, we are not in a position to modify the findings of our analysis and the policy options contained in the Issue Brief. I believe that, after so many discussions and clarifications from each side, we need to agree that there are many different points of view on this complex issue. For example, while maximizing the application of physical restitution would be fair from the point of view of the expropriated owners, it would risk

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being seen as unfair by those being displaced in the process, including people who may have bought properties *in bona fide* in compliance with the prevailing legislation.

Let me take this opportunity to clarify that the purpose of our analysis is not to defend the views of any particular group of stakeholders, but to offer a range of potentially workable policy options based on economic analysis and international practices. It is up to the Albanian authorities to select and implement the policy options they consider most appropriate, after considering the views and concerns of all relevant stakeholders in the Albanian society. In this context, I no longer consider revising the paper again useful.

I would also like to clarify this Issue Brief was prepared by an international team of World Bank experts based in our Washington Headquarters and not by the World Bank office in Albania. Let me also note that the World Bank is no longer engaged in any dialogue or advice to the government of Albania on the restitution and compensation issue, as our analytical work on this subject has been completed.

I would like to wish you the best in your endeavors.

Sincerely,



Jane Armitage  
Country Director and Regional Coordinator  
for Southeast Europe  
Europe and Central Asia Region

cc: Mr. Piero Cipollone, Executive Director, the World Bank