

No	Country	Institute	Approved by	Comments	Feedback/Proposed answer
1	HU	ÉKÖVIZIG	Miklós Rác - director	<p>ÉKÖVIZIG found that the document speaks generally about pollutant sources and their origin, status and quality of surface and groundwater and hydromorphological alterations – projected to the countries of the river basin, and built upon statistical basis, considering population density.</p> <p>The plan mainly contains the chemical and ecological monitoring, and does not cover the quantitative monitoring of surface waters.</p> <p>The plan is in accordance with the River Basin Management Plan of Hungary and the results reflect clearly.</p> <p>For their Tisza River Basin related part they do not have other comments on this documentation.</p>	Thank you for the feedback sent by the North Hungarian Environment and Water Directorate
2	HU	KÖRKÖVIZIG	Bak Sándor Director	In many details, the study processes the partial results of the Hungarian River Basin Management Plans (HRBMPs) created under the EU Water Framework Directive (WFD). At the same time, it deals with surface waters' assessment mainly. Eventual development of the groundwater bodies' chapters in the documentation, according to its Disclaimer and Conclusions, is expected by September 2010. That is why the groundwater bodies less emphasized in the plan, which is not consistent with the approach of WFD presently. On the whole, the plan is a bit too general but contains correct observations mainly.	Thank you for the feedback. The final analysis results are now available in the plan, list of groundwaters and related details can be found in Annex 5,9,10,11. SWMIs and related assessments are relevant for both surface and groundwater. In connection to groundwater issues, however, more details can be introduced in the next RBM cycle.
3	HU	KÖRKÖVIZIG	Bak Sándor Director	The ICPDR study also contains significantly dissimilar data and conclusions to the HRBMPs we comment in the following points:	
4	HU	KÖRKÖVIZIG	Bak Sándor Director	1. Although 95% of Hungary's drinking water is retrieved from groundwater sources, only a few sentences deal with waterbodies and the quality of drinking water. The plan does not set out the natural pollutants (As, Fe, Mn) of deeper porous (confined) groundwaters on the Great Plain. For example, arsenic is mentioned only between the hazardous industrial pollutants.	The Tisza countries have not identified drinking water quality related issues as significant problem to be dealt with in sub-basin wide scale, however, groundwater bodies, which are used for drinking water abstraction are listed in the relevant annexes. Sentence on the natural origin of iron, manganese and arsenic in Hungary, Romania and Serbia is now added to the relevant chapter.
5	HU	KÖRKÖVIZIG	Bak Sándor Director	2. Status assessment of water bodies is made by standards less strict than the HRBMPs used (or it is possible that the study evaluates on the basis of preceding HRBMPs). Only one (sp.2.13.2) of the groundwater bodies of our Directorate's responsibility is in poor chemical status, and all water bodies are in good quantitative status in this study.	The results of the GWB status assessment implemented in the HRBMP are the same than in the draft ITRBMP. There is a difference only in the visualisation of the related maps: the national RBMP maps related to the GWB quantitative status also indicate a category "good status with risk of poor status" that means "water balance is close to zero" with a striped marking on the said GWBs (in order to call attention). But there is only two quantitative status categories to under the WFD reporting requirements: good and poor.
6	HU	KÖRKÖVIZIG	Bak Sándor Director	3. The name of sp.2.13.2 shallow porous and p.2.13.2 porous is written in a wrong way in the documentation. They called Körös-Maros Interfluve, the original name („Maros-Körös Interfluve”) has been changed 1,5 years ago.	Annex - Related text is revised
7	HU	KÖRKÖVIZIG	Bak Sándor Director	4. The draft plan and Map 14 as well, it failed to separate the shallow porous waters joined to surface waters, and the porous water bodies usually located under the depth of 30 meters. Detaching the two types of water bodies could solve the comparability problem caused by the differences between the status assessment methods of the ICPDR and the HRBMPs as stated above.	Answer related to the different status assessment is under the point 5. Nevertheless, most of the Tisza HU GWBs are overlapped (there are pairs of GWBs: the shallow GWBs and the deeper ones) except the HU_SP.2.7.1 (Cserehát) and the HU_K.2.2 (Aggtelek) GWBs only. Their separated presentation (to pairs of maps "a" and "b") would be useful for better visualisation - and will be taken into account in the next planning cycle of WFD.
8	HU	KÖRKÖVIZIG	Bak Sándor Director	5. This document not nearly includes informations about thermal waters; however the characterization of them in the study should be justified by the close hydrodynamic relationship between groundwaters, the significant water use and its consequences in the Carpathian Basin.	Delineation of the thermal GWBs in the Tisza countries is not in the status what would make possible their status assessment in this planning cycle (as in case of the DE-AT transboundary deep groundwater body – thermal water body). It is proposed to focus on this topic in the next RBM cycle.
9	HU	KÖRKÖVIZIG	Bak Sándor Director	6. In ICPDR's vision water uses do not exceed the available groundwater resources, keeping EU Directives and establishing a regulatory framework. Additionally, keeping EU Directives, the emissions of polluting substances do not cause any deterioration of groundwater quality, the ambition is the restoration of polluted waters to good quality. Generally we do agree on the statements, supplementing that compliance with legislation is influenced by site-specific economic, natural, temporal factors as well, especially for (illegal) water uses and pollutions.	The vision is the highest 'wish' to be achieved in sub-basin wide scale and achievement/fulfilment of vision is depending on wide range of factors as it is stressed in the comment
10	HU	KÖRKÖVIZIG	Bak Sándor Director	7. To reach and to keep good status of groundwater bodies HRBMPs contains a lot more, fully determined measures than this draft plan offers.	Current plan is focusing on proposed measures, which are relevant on Tisza River Basin wide scale.

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11	RO	Apele Romane	Ruxandra Gîrbea and Jula Grazeilla - Biolog	In Romania the process of Public Consultation for the draft of Tisza River Basin Management Plan was finished by 20 August 2010. Apele Romane has received favourable feedback from the stakeholders and in some cases no comments or observations arrived. There is only one comment for „other types of pressures”, regarding the process of afforestations and vegetation fires (arsons) along some of the watercourses, which are suggested also to be included in this Plan.	According to the discussions related to integration issues specific pressures and impacts were listed playing a role in two or more Tisza countries. As a possible solution pressures from deforestation can be mentioned under flood and excess water as well as related to land use management issues. Problem related to vegetation fires was never discussed and is not relevant at least for two countries in the basin.
12A	HU	KÖTIKÖVIZIG	Lovas Attila - director	1a. It would be useful to provide some information in the introduction chapter about the objectives of the plan and the target groups. If one of the objectives aimed the further international cooperations among the Tisza countries, should provide a frame for this cooperation.	The ITRBM Plan 'Disclaimer' has introduced the target group and the 'introduction chapter - subchapter I.2.' - deals with the frame of the international cooperation, which is the Memorandum of Understanding (MoU) towards a river basin management plan for the Tisza River Basin' signed in 2004 by Ministers of the Tisza countries. Updates of the former MoU is under development and will be introduced next year as the basis of further cooperation.
12B	HU	KÖTIKÖVIZIG	Lovas Attila - director	1b. We also emphasize to identify the pressures and main problems of the prioritized surface and underground water bodies, because some chapter of the plan are so general and don't go into details in this issues.	Related to the comments on pressures and main problems: the ITRBM Plan is based on the national plans of the Tisza countries and can be only interpreted in conjunction with the national river basin management plans developed in the EU MS. The main objective of the document is to give information on sub-basin related problems and consider measures which have positive impact on transboundary scale.
13	HU	KÖTIKÖVIZIG	Lovas Attila - director	2. The final plan should be more focus in details for the transboundary dimension of the main problems facing water management in the basin, also the harmonization of this objectives and measures.	Problems listed under point 13A and 13B is proposed to be mentioned under relevant chapters as a sample
13A	HU	KÖTIKÖVIZIG	Lovas Attila - director	Some of the main problems in the transboundary water bodies in the national part of the basin: Transboundary surface water bodies: • Szamos: cadmium and copper loads from mining activities, • Tisza: significant amount of communal pollution at floods, cyanid spill in 2000. • Körös water system: scarcity of water resource, cadmium and copper loads from mining activities • Maros: scarcity of water resource, no agreement on sufficient water level	Problems listed under point 13A and 13B is proposed to be mentioned under relevant chapters as a sample
13B	HU	KÖTIKÖVIZIG	Lovas Attila - director	Transboundary groundwater bodies: • Nyírség groundwater bodies: decreasing water level pressure, the abstraction is more than the lateral recharge, risk at chemical status, pollution from agriculture • Maros alluvial fan: risk at groundwater chemical status and quantitative status	Problems listed under point 13A and 13B is proposed to be mentioned under relevant integration issues as a sample
14	HU	KÖTIKÖVIZIG	Lovas Attila - director	3. We suggest the flood issue to be more prioritized in the plan texture and provide more information about the priority of the severe floods. Current projects (for example: Updated Vásárhelyi Plan and Flood Risk Management project in Hungary) should be mentioned in the relevant chapter and also highlight the importance of the harmonization of the projects objectives with the adjacent countries flood management practice.	The Tisza Analysis Report - 2007 is dealing in details with the problem arose from flood, excess water, drought and water scarcity also introducing relevant project (e.g. the Vasárhelyi Plan). The current management plan is more focusing on the flood and flood management related integration issues, however, separate Annex (Annex 16) also included on flood strategy developed for the Tisza River Basin in the frame of the ICPDR.
15	HU	KÖTIKÖVIZIG	Lovas Attila - director	4. Some data in the plan are not updated upon the national river basin management plan final version which was uploaded in April 2010. For example the number of the surface and groundwater bodies (even if we consider the mentioned double-counts for some transboundary sections) are not relevant with the provided data in the national plan (the number of the groundwater bodies in the HU part is 70 - Table IV. contains 88 groundwater bodies).	The reason of the different number in groundwater data between national and transboundary scale is the different dimension of the data collection. The ITRBM Plan investigated on groundwater bodies larger than 1000km ² and with sub-basin relevance. It means that no all GWBs were taken into account, which were considered in the national reports.

ABBREVIATIONS

North Hungarian Environment and Water Directorate (ÉKÖVIZIG)

Körös Valley District Environment and Water Directorate (KÖRKÖVIZIG)

Middle-Tisza District Environment and Water Directorate (KÖTIKÖVIZIG)

Administrația Națională "Apele Române"

ITRBM Plan - Integrated Tisza River Basin Management Plan

HRBMP - Hungarian River Basin management Plan

SWMIs - Significant Water Management Issues