
**RESPONSE DOCUMENT (TABLE OF COMMENTS) TO
THE DRBM
PLAN PUBLIC CONSULTATION PROCESS**



||||| Deutschland ||| Österreich ||| Česká republika ||| Slovensko ||| Magyarország ||| Slovenija ||| Hrvatska ||| Bosna i Hercegovina ||| Crna Gora ||| România ||| България ||| Moldova ||| Україна |||

Organisation	Comment received	Steps undertaken by the ICPDR:	
		Comment has been integrated in the DRBM Plan	Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO
Association of Water Companies- AVS and Association of Industrial Ecology- AIE		The comments received from AVS very often make reference to the comments that were sent to Slovakia on the national B level RBM report. This reply only relates to issues relevant for the A level DRBM Plan. Comments have been coordinated with the responsible Slovakian representatives in the ICPDR.	
	<ul style="list-style-type: none"> · In contrast to the SK draft RBM Plan, the DRBM Plan is considered as good material. It is transparent and readable. However: 	General comment - no need for integration	
	<ul style="list-style-type: none"> · DRBMP should be in accordance with national plans; 	The DRBM Plan is strongly based on national information; therefore the accordance should be given. However, discrepancies may arise out of different reasons, which is outlined in the disclaimer of the DRBM Plan.	
	<ul style="list-style-type: none"> · DRBMP should follow true data which are available and controllable by public; 	The DRBM Plan is strongly based on national information. Those have been transparently used for analyses and map visualisations.	
	<ul style="list-style-type: none"> · Request to include description of the manner of data collection and its processing for the DRBM Plan. And inclusion of control mechanism of correction of data (quality control). 	The data used for the analyses and maps in the DRBM Plan are largely based on national data, which have been collected thoroughly during the last years (since the Danube Basin Analysis 2004). The data are now part of ICPDR data bases as well as the DanubeGIS system. The data collection has been discussed within the ICPDR Expert Groups and in the wider frame of the ICPDR together with the observers. The information is made transparent through the analysis and maps. Methodologies for the data collection are also described in respective annexes of the DRBM Plan.	
	<ul style="list-style-type: none"> · Not clear which data are shown in DRBM Plan tables and in particular annexes. Data in table and text are NOT consistent. 		

Organisation	Comment received	Steps undertaken by the ICPDR:		
		Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Association of Water Companies- AVS and Association of Industrial Ecology AIE	<ul style="list-style-type: none"> In case of Slovakia, we are afraid if the provided data are correct. Most of data are missing in National Plan, and more detailed data are provided for international than national level; 			SK has been contacted on this issue and an answer is under preparation.
	<ul style="list-style-type: none"> Major drawback in National Plan of Slovakia: Absence of environmental objectives, missing scenarios in the programme of measures, estimation of pollution reduction and calculation of effectiveness of proposed measures; To prevent negative impact on DRBM Plan, comments are provided. 			SK has been contacted on this issue and an answer is under preparation.
	<ul style="list-style-type: none"> Outline of drawback in the SK national RBM Plan 			This is due to differences in the level of aggregation between national and basin wide level, due to different reference years (the DRBMP considered 2005/2006), and due to different methodologies at national levels
	<ul style="list-style-type: none"> Data mentioned in DRBM Plan are missing in SK Plan 			This is due to differences in the level of aggregation between national and basin wide level, due to different reference years (the DRBMP considered 2005/2006), and due to different methodologies at national levels
	<ul style="list-style-type: none"> The fulfilment of the DRB visions/management objectives depends on responsible approach on national level. Therefore, recommendation to approve mechanisms for providing data by particular countries, to lower the risk to minimum for providing incorrect data 			Correct, but this depends on individual country

Organisation	Comment received	Steps undertaken by the ICPDR:		
		Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Association of Water Companies- AVS and Association of Industrial Ecology AIE	<i>DETAILED COMMENTS:</i>			
	<i>Status Assessment.</i>			
	· Chapter 4.1.3. Worries about the level of confidence of ecological status assessment in DRB which does not fulfil the criteria of low level of confidence;		No	This is a national issue, but SK has been asked to provide an answer to the issue raised)
	· Table 3.1.4.2., part 3.1.4., p.23, contradiction in number of identified WB with the risk of not achieving good ecological status(878WB identified, 823 WB still remain at risk, not correspondent with assessment in which good eco status will achieve only 613 WB);		No	SK has been contacted on this issue and an answer is under preparation.
	· Chapter 5.1. Based on reduction of effects good status of surface bodies until 2015 will be achieved only in 1158WB, while the assessment of eco status shows that already good status is in 1150WB;		No	SK has been contacted on this issue and an answer is under preparation.
	· Similar drawback in chemical status of surface water bodies (Out of 1793WB good chemical status is at 1690WB)		No	SK has been contacted on this issue and an answer is under preparation.
	· Data of Status assessment of surface water bodies from May 2009 are not given and it is not clear whether they should be used for DRBMP; Indication of ref year.		No	SK has been contacted on this issue and an answer is under preparation.
	<i>Groundwater.</i>			
· Status assessment of groundwater: The unavailability of source data and unclear methodology of carrying out the assessment is considered as problematic;		No	SK has been contacted on this issue and an answer is under preparation.	

Organisation	Comment received	Steps undertaken by the ICPDR:		Explanation why comment could not be integrated into the DRBM Plan
		Comment has been integrated in the DRBM Plan		
		Yes	NO	
Association of Water Companies- AVS and Association of Industrial Ecology- AIE	· Exclusion of solution of contaminated sites from DRBMP is not in line with WFD requirements – no integrated approach.		No	ICPDR concluded an inventory of accidental risk spots and prepared methodologies for quantification of risks and preparation of measures for preventing accidental pollution, which were integrated in the DRBM plan.
	Discrepancies between DRBM Plan and SK Plan:			
	· Question AWC & AIE: Are data provided by SK for the DRBM Plan correct?			SK -as any other DRB country involved in the DRBMP process - followed an harmonized procedure in line with the EU reporting requirements (related to data collection, pressures assessment, and development of program of measures and related economic analysis)
	· Big discrepancies of data among DRBMP and Slovakian National RBMP are considered as problematic and should be tackled (see comments Page 4):			A basin-wide harmonised methodology based on the EU reporting requirements has been used for all countries - non EU and EU. The differences to the national level are mainly due to the results of the different aggregation at the different levels. In the case of SK, the large differences exist mainly in terms of loads and this is due to different methodology of pressures analysis.

Organisation	Comment received	Steps undertaken by the ICPDR:		Explanation why comment could not be integrated into the DRBM Plan																																																											
		Comment has been integrated in the DRBM Plan																																																													
		Yes	NO																																																												
Association of Water Companies- AVS and Association of Industrial Ecology AIE	<table border="1"> <thead> <tr> <th>Type of data/information</th> <th>DRBD MP</th> <th>RBMP</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td></td> <td><i>draft DRBD MP, part 2.1.1.1., p. 9, Fig. 3</i></td> <td><i>draft RBMP, part 3.1.1.1, Tab.3.1.1.1.2, p.4</i></td> <td></td> </tr> <tr> <td>generated load (PE)</td> <td>4,9 mio.</td> <td>*5,23 mio.</td> <td>*for whole territory (incl. Vistula RBD)</td> </tr> <tr> <td></td> <td><i>DRBD MP, Annex 3, p. 32, Tab. 9</i></td> <td><i>draft RBMP, part 3.1.1.1, Tab.3.1.1.1.2, p.4</i></td> <td></td> </tr> <tr> <td>treatment level</td> <td>91,3 % collected and treated (4,44mio of 4,87mio); 5,2 % not collected and not treated (0,25mio of 4,87 mio)</td> <td>80 % collected and treated, 13% by individual systems; 6,9 % not collected and not treated</td> <td></td> </tr> <tr> <td></td> <td><i>draft DRBD MP, part 2.1.1.2, p. 9, Fig. 3</i></td> <td><i>draft RBMP, part 3.1.1.2, p.8, Annex.3.1.1.2.1,</i></td> <td></td> </tr> <tr> <td>industrial sources of emissions</td> <td>data for TOC from - chemical, - pulp and paper, - other industries; food industry - missing</td> <td>*TOC per relevant industries not available</td> <td>*218 significant industrial sources, data for COD, N, P; no BOD and TOC; data are incompletely</td> </tr> <tr> <td></td> <td><i>DRBD MP, Annex 3, p. 32, Tab. 9</i></td> <td><i>draft RBMP, part 3.1.1.1, p. 5, Tab. 3.1.1.1.3</i></td> <td></td> </tr> <tr> <td>Emissions COD (kt/y)</td> <td>73,972</td> <td>*26,163</td> <td>*only for Danube RBD</td> </tr> <tr> <td>Emissions BOD₅ (kt/y)</td> <td>34,553</td> <td>*7,569</td> <td>*only for Danube RBD</td> </tr> <tr> <td>Emissions N_{tot} (kt/y)</td> <td>11,441</td> <td>*8,171</td> <td>*only for Danube RBD</td> </tr> <tr> <td>Emissions P_{tot} (kt/y)</td> <td>1,732</td> <td>*1,320</td> <td>*only for Danube RBD</td> </tr> <tr> <td></td> <td><i>DRBD MP, Annex 3, p. 31, tab. 9.</i></td> <td><i>draft RBMP, part 7.1.3, p. 5, Tab. 7.1.3.1</i></td> <td></td> </tr> <tr> <td>new collecting system and WWTP</td> <td>85 agglomerations, are without collecting system and WWTP 43 agglomerations are collected and no treated</td> <td>*for 47 agglomerations new WWTP and for 271 municipalities new collection system</td> <td>*only for Danube RBD</td> </tr> </tbody> </table>				Type of data/information	DRBD MP	RBMP	Remarks		<i>draft DRBD MP, part 2.1.1.1., p. 9, Fig. 3</i>	<i>draft RBMP, part 3.1.1.1, Tab.3.1.1.1.2, p.4</i>		generated load (PE)	4,9 mio.	*5,23 mio.	*for whole territory (incl. Vistula RBD)		<i>DRBD MP, Annex 3, p. 32, Tab. 9</i>	<i>draft RBMP, part 3.1.1.1, Tab.3.1.1.1.2, p.4</i>		treatment level	91,3 % collected and treated (4,44mio of 4,87mio); 5,2 % not collected and not treated (0,25mio of 4,87 mio)	80 % collected and treated, 13% by individual systems; 6,9 % not collected and not treated			<i>draft DRBD MP, part 2.1.1.2, p. 9, Fig. 3</i>	<i>draft RBMP, part 3.1.1.2, p.8, Annex.3.1.1.2.1,</i>		industrial sources of emissions	data for TOC from - chemical, - pulp and paper, - other industries; food industry - missing	*TOC per relevant industries not available	*218 significant industrial sources, data for COD, N, P; no BOD and TOC; data are incompletely		<i>DRBD MP, Annex 3, p. 32, Tab. 9</i>	<i>draft RBMP, part 3.1.1.1, p. 5, Tab. 3.1.1.1.3</i>		Emissions COD (kt/y)	73,972	*26,163	*only for Danube RBD	Emissions BOD ₅ (kt/y)	34,553	*7,569	*only for Danube RBD	Emissions N _{tot} (kt/y)	11,441	*8,171	*only for Danube RBD	Emissions P _{tot} (kt/y)	1,732	*1,320	*only for Danube RBD		<i>DRBD MP, Annex 3, p. 31, tab. 9.</i>	<i>draft RBMP, part 7.1.3, p. 5, Tab. 7.1.3.1</i>		new collecting system and WWTP	85 agglomerations, are without collecting system and WWTP 43 agglomerations are collected and no treated	*for 47 agglomerations new WWTP and for 271 municipalities new collection system	*only for Danube RBD			
	Type of data/information	DRBD MP	RBMP	Remarks																																																											
		<i>draft DRBD MP, part 2.1.1.1., p. 9, Fig. 3</i>	<i>draft RBMP, part 3.1.1.1, Tab.3.1.1.1.2, p.4</i>																																																												
	generated load (PE)	4,9 mio.	*5,23 mio.	*for whole territory (incl. Vistula RBD)																																																											
		<i>DRBD MP, Annex 3, p. 32, Tab. 9</i>	<i>draft RBMP, part 3.1.1.1, Tab.3.1.1.1.2, p.4</i>																																																												
	treatment level	91,3 % collected and treated (4,44mio of 4,87mio); 5,2 % not collected and not treated (0,25mio of 4,87 mio)	80 % collected and treated, 13% by individual systems; 6,9 % not collected and not treated																																																												
		<i>draft DRBD MP, part 2.1.1.2, p. 9, Fig. 3</i>	<i>draft RBMP, part 3.1.1.2, p.8, Annex.3.1.1.2.1,</i>																																																												
	industrial sources of emissions	data for TOC from - chemical, - pulp and paper, - other industries; food industry - missing	*TOC per relevant industries not available	*218 significant industrial sources, data for COD, N, P; no BOD and TOC; data are incompletely																																																											
		<i>DRBD MP, Annex 3, p. 32, Tab. 9</i>	<i>draft RBMP, part 3.1.1.1, p. 5, Tab. 3.1.1.1.3</i>																																																												
	Emissions COD (kt/y)	73,972	*26,163	*only for Danube RBD																																																											
	Emissions BOD ₅ (kt/y)	34,553	*7,569	*only for Danube RBD																																																											
	Emissions N _{tot} (kt/y)	11,441	*8,171	*only for Danube RBD																																																											
Emissions P _{tot} (kt/y)	1,732	*1,320	*only for Danube RBD																																																												
	<i>DRBD MP, Annex 3, p. 31, tab. 9.</i>	<i>draft RBMP, part 7.1.3, p. 5, Tab. 7.1.3.1</i>																																																													
new collecting system and WWTP	85 agglomerations, are without collecting system and WWTP 43 agglomerations are collected and no treated	*for 47 agglomerations new WWTP and for 271 municipalities new collection system	*only for Danube RBD																																																												

Organisation	Comment received	Steps undertaken by the ICPDR:		
		Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
University of Natural Resources and Life Sciences Vienna	A three pages document ' <i>The importance of sediment continuum and self forming morphodynamic processes according to the aims of the EU WFD</i> ' has been provided in the frame of the DRBM Plan public consultation. The document fosters the importance of sediment quantity, that should be tackled in the DRB.	Yes, partly		The DRBM Plan includes a first outline on the sediment issue, which underlines the importance of sediments and states that this issue will be followed-up on the basin-wide scale. Consideration: A blue box will be added to the DRBM Plan which emphasises issues related to sediment quantity and transport to be followed-up after the finalisation of the DRBM Plan (i.e. decision whether sediments will be a SWMI in the DRB).
	Addressing sediment continuum and active sediment transport referring to spawning habitats and its degradation process due to taken measures in river	Yes, partly		
	Recommendation that habitats which are directly linked to the sediment continuum have to be seen as "key habitats" for fulfilling the aims of EU WFD	Yes, partly		

Organisation	Comment received	Steps undertaken by the ICPDR:		
		Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Naturschutzbund Bayern	Comments were sent in German and are summarised in English.	The comments received from Naturschutzbund very often make reference to the comments that were sent to Bavaria on the national B level RBM report. This reply only relates to issues relevant for the A level DRBM Plan. Comments have been coordinated with the responsible ICPDR representatives in Bavaria.		
	GENERAL COMMENTS:			
	<ul style="list-style-type: none"> The DRBM Plan is based on national RBM Plans. Respective shortcomings from the national level are also subject to international level. Weblink reference on comments from Naturschutzbund Bayern regarding the national comments is given. The drafts on the national level regarding the Bavarian share of the DRBD show significant gaps/shortcomings that are also reflected on the international level. 			
	DETAILED COMMENTS:			

Organisation	Comment received	Steps undertaken by the ICPDR:		
		Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Naturschutzbund Bayern	· Publication of detailed data regarding maps and tables is requested.	ICPDR has received the data, which have been used in the DRBM Plan from the national governments. Those are stored in ICPDR databases as well as the DanubeGIS. The handing over of data to stakeholders in future (i.e. national GIS data) has to be discussed in the frame of the ICPDR. In the meantime, individual data requests can be put forward and will be followed-up. However, any requests to make the data publicly available should primarily be directed to the individual national governments.		
	· The analysis of the Bavarian DRBD share is not sufficient.			
	o Insufficient delineation of surface and groundwater bodies			
	o Insufficient reporting of wetlands/floodplains	The DRBM Plan reflects those floodplains/wetlands with reconnection potential and those which will be factually connected to the adjacent water body by 2015. The WFD does not require the assessment of floodplains/wetlands in general despite if they negatively impact the water status of an adjacent surface water body. However, the ICPDR covered the disconnection of wetlands in the Plan realising the importance for the DRB. The current analysis is based on data provided by the Danube countries and will be further improved in the upcoming years to ensure a complete picture in the DRB.		

Organisation	Comment received	Steps undertaken by the ICPDR:		Explanation why comment could not be integrated into the DRBM Plan
		Comment has been integrated in the DRBM Plan		
		Yes	NO	
Naturschutzbund Bayern	· Hydromorphological alterations have to be seen in a holistic way also addressing quantitative sediment transport. This aspect has to be integrated in the DRBM Plan (page 2)	Yes, partly		We acknowledge and agree that sediment quantity and transport is important for the ecological integrity of rivers. The DRBM Plan includes a first outline on the sediment issue even if it is not a SWMI. The outline makes clear that sediments are of importance and that it will be followed-up on the basin-wide scale. Consideration: A blue box will be added to the DRB M Plan which emphasises issues related to sediment quantity and transport to be followed-up after the finalisation of the DRBM Plan (i.e. decision whether sediments will be a SWMI in the DRB).
	<i>Significant Water Management Issues</i>			
	· Emission of heat into waters are underestimated in the DRBM Plan especially in the light of developments regarding climate changes		No	So far no transboundary impacts have been reported to the ICPDR and therefore this issues has not been integrated yet. This may be a future issue when more knowledge is available about the impacts of climate change.
	· Organic pollution – 2.1.2: reference to national comments			The ICPDR did not screen the national comments but exchanged in detail with the Bavarian ICPDR representatives.

Organisation	Comment received	Steps undertaken by the ICPDR:		
		Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Naturschutzbund Bayern	· HYMO alterations: High relevance on international level as significant number of barriers in upper Danube. The position to favour the hydropower generation sector is requested by Naturschutzbund to be opposed. Measures foreseen on national level are not sufficient and are reflected on the A-level as well.	Yes, based on Bavarian revision and judgement of relevance.		Revision of data has been performed by Bavaria. The data included in the Final DRBM Plan are based on this revision.

Organisation	Comment received	Steps undertaken by the ICPDR:		
		Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Naturschutzbund Bayern	· Discrepancies regarding River Lech: HMWB designation is not transparent		No	Bavarian reply to comment: The section of the River Lech IL 337 shows heavy alterations due to an impoundment and the respective hydropeaking effect on the section downstream. Due to those alterations the natural, typespecific character of the River Lech cannot be ensured in connection with legal licences for the water use causing the alterations. The good status cannot be achieved through hydromorphological measures without causing significant adverse effects on the water use. Therefore this Lech stretch has been designated as HMWB. The national Programem of Measures includes measures to ensure the good ecological status according to the WFD timeframe. Further, the current project 'Kies für den Lech' serves the improvement of the Lech's status and the achievement of the good ecological potential by 2015 can be rated as feasible. The section of the River Lech IL 333 between ST23 and Hochablass is straightened and serves the flood protection of the City of Augsburg.

Organisation	Comment received	Steps undertaken by the ICPDR:		Explanation why comment could not be integrated into the DRBM Plan
		Comment has been integrated in the DRBM Plan		
		Yes	NO	
Naturschutzbund Bayern				To prevent deepening of the river bottom, six stabilising sills have been constructed causing barriers each with several meters of difference in height. The restoration of the type specific character of the River Lech in this stretch would impact the flood protection but also the drinking water supply. The necessary land for restoration is not available and therefore the good ecological status cannot be achieved by 2015 and beyond . This resulted a HMWB designation.
	Chapter 2.1.4.1. · River and habitat continuity interruption (Map 5): Not reflected correctly for Bavarian Danube; 4 hydropower stations east of Ingolstadt are not fully passable for fish (i.e. Staustufe Vohburg).	Yes		Revision of data has been performed by Bavaria. The data included in the Final DRBM Plan are based on this revision.

Organisation	Comment received	Steps undertaken by the ICPDR:		
		Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Naturschutzbund Bayern	<p>· Criticism that restoring river continuum is not sufficient enough to restore habitat continuity. Lateral reconnection has to be part of assessment and measures. Consider sediment continuum as well in this frame, which is needed to ensure ecological status in future. Therefore, river continuum needs to be addressed in a more differentiated way in the DRBM Plan.</p>		No	<p>In general, lateral connectivity and the reconnection of floodplains/wetlands is part of the DRBM Plan. The HYMO alterations, including the disconnection of floodplains is considered to be a SWMI and is addressed with measures. The restoration of river and habitat continuity is not considered as the only measure to achieve the WFD environmental objectives - it is seen and addressed in combination with the other HYMO components. Bavarian reply to comment: According to Annex V of the EU WFD, hydromorphological components are supporting parameters for the biological quality elements (BQE). Therefore, Bavaria states that HYMO measures only have to be implemented to create an adequate basis for the BQEs to achieve the good status. This is also relevant regarding the reconnection of wetlands and floodplains. In relation to the results of the respective analysis and the monitoring assessments measures related to the restoration of longitudinal river and habitat continuity are central for achieving the good ecological status.</p>

Organisation	Comment received	Steps undertaken by the ICPDR:		Explanation why comment could not be integrated into the DRBM Plan
		Comment has been integrated in the DRBM Plan		
		Yes	NO	
Naturschutzbund Bayern	<ul style="list-style-type: none"> If 19 % of barriers- as indicated in the Plan – are without any specific use, appropriate measures should be foreseen as quickly as possible (i.e. removal of barrier). 	Yes		In general, it can be said that a barrier without any specific use should be removed. The respective decision has to meet on the national level. However, the meaning of 'other use' needs to be understood in that way: An existing barrier has another use than e.g. hydropower generation, navigation or water supply. It does not necessarily indicate that a barrier is without use.
	<p>Chapter 2.1.4.2.</p> <ul style="list-style-type: none"> Reduction to a few reconnection measures for an overall area of 600.000 ha is by far not enough effort for the DRB. 		No	The DRBM Plan reflects those floodplains/wetlands with reconnection potential and those which will be factually connected to the adjacent water body by 2015. The WFD does not require the assessment of floodplains/wetlands in general, but only if they negatively impact the water status of an adjacent surface water body. However, due to the importance of disconnected wetlands, this issue is tackled in the DRBMP. The current analysis is based on data provided by the Danube countries and will be further improved to ensure a complete picture in the DRB.
	<ul style="list-style-type: none"> DE only reported 2 wetlands to be reconnected, whereas far more possibilities do exist to reconnect wetlands/floodplains. Some are listed and should be integrated in the Plan (i.e. Schwäbische Donau). 		No	Bavarian reply to comment: The natural retention potential wetlands and therefore their reconnection is part of the Bavarian Flood Action Programme 2020. The Ministerat decided upon the continuation of

Organisation	Comment received	Steps undertaken by the ICPDR:		Explanation why comment could not be integrated into the DRBM Plan
		Comment has been integrated in the DRBM Plan		
		Yes	NO	
Naturschutzbund Bayern	<ul style="list-style-type: none"> Reference to other projects on the national level/in the national RBM Plans is not sufficient enough to reflect the situation in the DRB. 			<p>this programme in 2009. The TU München currently perform a study that identifies all potential retention areas regarding their effectiveness. Due to the complexity of calculations, the results are expected by 2012 only. Independent from this, several restoration and reconnection projects are being performed along the Danube (Ridensheim Katzau). Similar projects are undertaken along the River Isar.</p>
	Chapter 2.1.4.3.			
	<ul style="list-style-type: none"> Reference to comments on the Bavarian RBM Plan: situation has not been reflected correctly in the national RBM Plan and the measures are not sufficient to solve the situation. As a consequence, this is also reflected in the DRBM Plan. 			<p>This is a national issue.</p>

Organisation	Comment received	Steps undertaken by the ICPDR:		
		Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Naturschutzbund Bayern	· Proposed A-Level criteria for minimum ecological flow = too low		No	The ICPDR is aware that different approaches exist regarding the determination of the minimum ecological flow. The HYMO TG intensively discussed the definition of an appropriate threshold, which can be applied for all Danube countries easily and resulted in this specific criteria. All analysis have been based on this criterion and allows a sound first time overview on the basin-wide scale. Shortcomes will be followed up in the next RBM cycles.
	· Based on the polluter-pays-principle it should be mentioned in the Plan that impoundments do not only cause hydromorphological alteration but also increase flood risk because of retention area reduction.		No	Impoundments do cause other pressures than hydromorphological alterations. I.e. the effect of the Iron Gate Dams on nutrient pollution is reflected in the DRBM Plan. Flood risk is not in focus in the DRBM Plan and therefore not mentioned.

Organisation	Comment received	Steps undertaken by the ICPDR:		Explanation why comment could not be integrated into the DRBM Plan
		Comment has been integrated in the DRBM Plan		
		Yes	NO	
Naturschutzbund Bayern	<ul style="list-style-type: none"> Map 7: Not understandable; DE did not report any alterations despite the fact that all three pressures (impoundments, water abstraction, hydropeaking) affect the DE rivers to a high degree. Footnote 48 does not explain the situation at all. Revision needed. 	Yes		Revision of data has been performed by Bavaria. The data included in the Final DRBM Plan are based on this revision. Further, map 7 has been revised to be clearer. Three different maps on water abstraction, hydropeaking and hydrological alterations reflect the situation in 2009 and also the expected improvements by 2015.
	<p>Chapter 2.1.4.4.</p> <ul style="list-style-type: none"> The list does not reflect the actual state-of-play. Inclusion of Straubing-Vilshofen. 		No	Bavarian reply to comment: The plans regarding Straubing-Vilshofen are addressed in the Bavarian RBM Plan as part of Danube related issues. The inclusion into Annex 7 of the DRBM Plan is currently not possible due to the timeframe and state-of-play regarding the project planning.
	<p>Chapter 2.1.5.</p> <ul style="list-style-type: none"> Include sediment transport and related issues for the A-level. 	Yes, partly		The DRBM Plan includes a first outline on the sediment issue, which underlines the importance of sediments and states that this issue will be followed-up on the basin-wide scale. Consideration: A blue box will be added to the DRBM Plan which emphasises issues related to sediment quantity and transport to be followed-up after the finalisation of the DRBM Plan (i.e. decision whether sediments will be a SWMI in the DRB).

Organisation	Comment received	Steps undertaken by the ICPDR:		Explanation why comment could not be integrated into the DRBM Plan
		Comment has been integrated in the DRBM Plan		
		Yes	NO	
Naturschutzbund Bayern	Chapter 3. Protected areas			
	· The list of Protected areas in the DE Bavarian Plan is not complete – only water-related Natura 2000 are included. DRBM Plan incomplete: Map 9 is requested to include at least all protected areas – Natura 2000 which are part of the national RBM Plan.	Yes		DE added additional protected areas during the data revision phase, which are reflected in the final DRBMP.
	Chapter 4			
	· See WWF comments. Revision of non-transparent HMWB designation in the lower Danube.			The entire lower Danube River has been designated as HMWB. Details on the national designation approach are not reflected in the DRBM Plan. Details on the approach should be available in the national RBM Plans. Issues regarding the transparency of the designation should be discussed with RO respectively BG on the national level.
	Chapter 5			
· Inadequate DE application of exemptions. DRBM Plan should describe the background of application in critical manner.			The DRBM Plan intends to reflect for which water bodies WFD Article 4(4) and 4(5) has been applied in the DRBD waters. Explanations for the respective applications are available in the national RBM Plan.	
· High number of application 4(4) is unacceptable.			Bavarian reply on comment: The Bavarian Draft PoM during the first RBM cycle foresees priorities for ecological effective and cost effective measures. As far as needed, possible WFD exemptions are applied. However, exemptions according to WFD Article 4(5) are not foreseen in the first Bavarian RBM Plan.	
Chapter 6				
· Environmental costs for water uses are not adequately addressed.		No	Due to lack of data which is of a general nature, the assessment of environmental costs, resources cost and other components of total economic value of water for different water uses was not possible for this plan.	

Organisation	Comment received	Steps undertaken by the ICPDR:		
		Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Naturschutzbund Bayern	· Water uses related to navigation, energy, agriculture etc. are missing	Yes, partially		Please consult Annex 14 which includes several tables on basin wide compilation of data related to different water uses including those mentioned in the comment.
	· Significant improvement of Chapter 6 is requested.	Yes, partially		It is clearly stated that this chapter concentrates on the basin-wide level and further information can be found in the national plans. The chapter is intended to give an overview based on the available data.
	· Reference to DRBM Plan page 60 that <i>cost recovery is a matter of national level</i> – not acceptable.	Yes, partially		It is a correct statement in the transboundary context, where in a cross border area costs and benefits are shared. In the context of a certain water utility interested to get for example money for future development, and this should be considered in the cost recovery issue. This issues primarily is of a national concern.
	· DRBM Plan has to reflect a correct and comprehensive analysis regarding negative impacts and the responsible water users.		No	The respective information received on the basin-wide scale was not sufficient enough to be considered in the analysis - however, it is mentioned in the Plan.
Chapter 71.1 & 7.1.2:				

Organisation	Comment received	Steps undertaken by the ICPDR:		Explanation why comment could not be integrated into the DRBM Plan
		Comment has been integrated in the DRBM Plan		
		Yes	NO	
Naturschutzbund Bayern	· DRBM Plan should reflect clearer the need for a WFD friendly revision of the EU agricultural policy.	yes		It is already mentioned in the Plan, in the context of considering the WFD CAP (RDP) linkages or expected reduction of pollution such page 72.
	· Naturschutzbund emphasized the contribution to nutrient and organic pollution through agriculture in the upper DRBD.	yes		The scenario results (MONERIS) show this already.
	· It is recommended to base thresholds for organic pollution not only on technically or economically feasible measures but also on the type-specific sensitivity/capacity regarding pollution of rivers.	yes		This is already considered - supposing that the issue raised is about self purification capacity of rivers.
	Chapter 7.1.3.			
	· Input of hazardous substances input in case of collision of carriers (oil, hazardous substances) needs to be taken into account.	yes		This issue is referred to regarding the accidental pollution from navigation.
	Chapter 7.1.4.			
	· Naturschutzbund regrets that visions & management objectives focus on sturgeon migration. Also medium distance migrators should be considered (nose, barbel).	Yes		The vision and management objectives also focus on other migratory fish species besides sturgeon. This becomes clear in the prioritisation approach where medium distance migrants are addressed and covered besides the long distance migrants (sturgeon and other fish species). Besides sturgeon they serve for the identification of measures to restore longitudinal continuity. However, the role of medium distance migrators will be outlined stronger.

Organisation	Comment received	Steps undertaken by the ICPDR:		
		Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Naturschutzbund Bayern	· Also reconnection of in stream, between stream and tributaries should be taken into account	Yes		This issue is taken into account - see prioritisation approach criteria and calculation of priority index.
	· It is unrealistic that all DE barriers on the Danube, Lech, Isar and Inn will be passable by 2015.	Yes		Revision of data has been performed by Bavaria. The data included in the Final DRBM Plan are based on this revision.
	· Naturschutzbund request the ICPDR to check if reported measures serve the fulfilment of the WFD environmental objectives or if they only serve to partly achieve those aims. Further, ICPDR should check in how far those projects are realistic to be implemented and how water users will share respective costs.			This issue is reflected in the conclusions regarding river and habitat continuity interruptions and the key conclusions of chapter 7. The environmental objectives will not be achieved by 2015 and further actions are needed beyond 2015. This becomes obvious through the extensive application of WFD Article 4(4). This assumption will be validated through assessment results of the operational monitoring networks, which serve the assessment of measure implementation success/failure.
	· Reconnection of wetlands: Ambition through countries in DRBM Plan does not seem high enough. Revision of chapter needed. Further, it should be emphasized that a reconnection addresses the complete reconnection of flood areas.			The DRBM Plan reflects those floodplains/wetlands with reconnection potential and those which will be factually connected to the adjacent water body by 2015. The WFD does not require the assessment of floodplains/wetlands in general, but only if they negatively impact the water status of an adjacent surface water body. However, due to the importance of disconnected wetlands, this issue is tackled in the DRBMP. The current analysis is based on data provided by the Danube countries and will be further improved to ensure a complete picture in the DRB.
	· Hydrological alterations: No issues report for DE in Map7. Naturschutzbund requests the revision of the map to be produced regarding the measures for hydrological alterations in the DRB. Pressures resulting from heat emissions, nutrient and sediments should be included in the considerations.	Yes		Revision of data has been performed by Bavaria. The data included in the Final DRBM Plan are based on this revision.

Organisation	Comment received	Steps undertaken by the ICPDR:		
		Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Naturschutzbund Bayern	· Regarding Future Infrastructure Projects: Naturschutzbund supports the WWF comments.	Revision of data has been performed by Bavaria. The data included in the Final DRBM Plan are based on this revision.		
	Chapter 8:			
	· Climate change will largely affect wetlands and waters. Strict application of no-deterioration rule will be crucial to ensure status.			
	· In order to be climate proof, prioritization should be given to restoration projects as wetland reconnection rather than the implementation of technical measures (i.e. fish bypass channels). This should be emphasized in the DRBM Plan.		No	No prioritisation is given for measures to be taken. Implementation will be a follow up to DRBM Plan.
	· The DRBM Plan should include that intact wetlands and rivers are climate change measures.	CC chapter has been slightly revised indicating that a follow up as well as a detailed specification of measures will be undertaken between 2009 and 2015.		
	· Future climate change tasks should be listed			
· Connection between climate change chapter and the other chapters of the DRBM Plan is missing completely.				
Naturschutzbund agrees with WWF to completely revise this chapter				

Organisation	Comment received	Steps undertaken by the ICPDR:		
		Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Centre for Environmental Information and Education	<ul style="list-style-type: none"> CEIE proposes in relation to WFD Article 4 subsection b, the certain conditions according to which the water bodies will not accomplish the goals stated in the RBM Plan should be declared and the departures from the norms should be described in details for the related WB. 	Comment is not clear.		
	<ul style="list-style-type: none"> CEIE proposes the measures which should be taken in case of Article 4(6) from the WFD should be included and described in detail in the PoM 	Comment is not clear.		
	<ul style="list-style-type: none"> CEIE insists on the inclusion of hydropower plants – including small HPP – in the economic analysis of water uses (Chapter 6 of the Plan) in order to comply with the principle of expenses return from water services (incl. ecological and raw material expenses). 		No	Due to the lack of information, HPP are not reflected in the DRBM Plan within this RBM cycle. Especially, small HPP are rather an issue for the national level, as the catchment areas > 4,000 km ² rather include the medium-large HPPs. Respective information can be taken from the national Plan.
	<ul style="list-style-type: none"> Lack of information concerning human pressures on water and littoral resources (unclear to ICPDR) 	Comment is not clear.		
	<ul style="list-style-type: none"> Substantial data about diffuse and point source pollution are missing (comment BV: which ones?). Proposal to collect further data with support of civil groups, organizations and stakeholders. 		No	Data collection process is finalized for this Plan. The data collection followed an approved methodology in line with the EU reporting requirements.
	<ul style="list-style-type: none"> Substantial on groundwater monitoring are missing. Proposal to collect further data with support of civil groups, organizations and stakeholders. 		No	National issue - should be responded by the BG Ministry
	<ul style="list-style-type: none"> Pay special attention to FIPs regarding transport in the Danube River. 	No weighting is being performed. All FIPs are of importance. Information on navigation has been collected and is reflected in the DRBM Plan.		

Organisation	Comment received	Steps undertaken by the ICPDR:		
		Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Centre for Environmental Information and Education	· No information on bathing areas in Chapter 3 – Protected areas’.	The ICPDR decided that this issue is not of relevance on the basin-wide level as it is reflected in the national Plans. For protected areas it has been agreed that Natura 2000, protected areas in Non EU MS and nutrient sensitive zones are most relevant on the basin-wide level and are therefore reflected.		
	· Pay special attention to artificial wetlands		No	The DRBM Plan addresses wetlands/floodplains with reconnection potential and those, which will be reconnected by 2015. Artificial wetlands have not been considered in this Plan as they are mainly of importance on the B (national level).
	· No information on water transfer – should be added as it is of importance for entire DRB.	Not exactly clear what is meant. In case navigation is addressed with 'water transfer': Information on navigation has been collected and is reflected in the DRBM Plan.		
	· CEIE considers it of great importance that the compatibility of national RBM Plans and the existing RBM programmes, as well as the changes in legislation after the acceptance of the Plans are especially defined and officially stated in the countries.	In general, the DRBM Plan is compatible with the national Plans as it is based on the B-level to a large extent. The national PoMs are available in the respective countries and have to be implemented according to the WFD until 2015 and beyond in the next RBM cycles. As EU legislation has to be integrated into national law, the same is valid on the national level. The implementation on the basin-wide level will be followed-up in the frame of the ICPDR and will be reflected as well (i.e. the improvement of the water status by 2015). Changes occurring regarding the national legislation can not be predicted now.		
	· Recommendation to have a common template table for the PoM	Comment is not clear.		
CEIE suggests that the restrictive measures and related sanctions from non-implementation of RBM Plans are stated in the national Plans to become easily accessible to public.	The EC will perform a WFD compliance check regarding the current RBM Plans. Those results are not yet available and cannot be reflected in the current national RBM Plans.			

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
DEF	GENERAL COMMENTS			
	General appreciation of the DRBM Plan			
	In countries DEF missed a lot of adequate information and possibilities for participation. A lot of information has not available on time; This should be improved by December.			Comment addresses the national level.
	DETAILED COMMENTS			
	· Check designation of HMWB in Romania in all part of Danube, to avoid alleviate new and destructive FIP; Contradictory with EU WFD and misuse/misinterpretation of designation. DEF states that <i>'these stretches of the Danube (in RO and between RO/BG) are never HMWB</i> . The criteria of the ICPDR HYMO TG are cited and should be followed for the final designation. <i>'To avoid a deep loss of credibility the RO government should e change the designation'</i> .			In general, details on the approaches on HMWB designation and the assessment of the ecological status and ecological potential can be found in the respective national RBM Plans. The detailed description of each national method would go beyond the DRBM Plan scope. Please note that the joint approach on HMWB designation of the Danube River is included in the DRBM Plan outlining clear criteria of the exercise and information regarding the status/finalisation. Further, the Plan includes a statement that this exercise has not been finalised successfully as the outcomes are only partly harmonised due to the fact that agreed criteria have not been applied throughout the exercise. It can be concluded that the final HMWB designation still needs further validation based on intercalibrated/high confidence ecological status/potential results.
Wetland reconnection				
· This issue has not really been included in the RBM Plans by many countries.				

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
DEF	<ul style="list-style-type: none"> AT, DE, HU and RS are the only countries with the objective to realize wetland reconnection by 2015. This is not satisfying as all countries should make their contributions to wetland reconnection. 			<p>General comment: The DRBM Plan reflects those floodplains/wetlands with reconnection potential and those which will be factually connected to the adjacent water body by 2015. The WFD does not require the assessment of floodplains/wetlands in general, but only if they negatively impact the water status of an adjacent surface water body. However, due to the importance of disconnected wetlands, this issue is tackled in the DRBMP. The current analysis is based on data provided by the Danube countries and will be further improved to ensure a complete picture in the DRB. Based on the comments received during the public consultation process on wetlands/floodplains and on agreement within the ICPDR, the Danube countries have been asked to update data regarding this issue. The final DRBM Plan reflects this update. Shortcomes and gaps will have to be completed during the next RBM cycles. Floodprotection per se is not in focus of the DRBM Plan.</p>
				<p>However, the importance of floodplains as retention areas is known and mentioned in the Plan. Details will be addressed in future as the interlinkage of water quality and quantity issues (this is also outlined in chapter 8 of the DRBM Plan).</p>
	<ul style="list-style-type: none"> Infrastructure projects for technical flood protection should be reviewed under the perspective of wetland restoration as an alternative, technical solution. 			

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
CZ Ministry of Environment	List of Acronyms: IPPC -Integrated Pollution Prevention Control (without Directive), BREF, REACH and GMS should be given;	Yes		
	Table 1, Key tributaries: instead of Stratka, should be: Svatka;	Yes		
	Chapter 2.1.1.1, para. 2: Agglomeration 2-10 000 (21 mil PE)....Agl.>10 000 (73.6)=> Σ =94.6 mil. PE and on p.9, Fig.3 last col. (for the same sum different number) Σ = 95.1 mil. PE;	Yes		
	Ch. 2.1.4.3, Water abstractions: Hydropower 74%, agriculture 8%, urban use 7% compare with p.50, sentence 2: Agriculture 40%, industry 40%, urban use 20% (it should be explained, that it e.g. comprises also groundwater uptakes);		No	This analysis refers to water abstraction in surface water bodies.
	Ch. 4.1.4.1.1, sentence 5: It is not clear what the acronym N.B. stands for? Should be in the List of Acronyms or better to change the wording;	Yes		Deletion of N.B.
	Footnote 72: Please delete the CZ. The CZ should implement the UWWT Directive till the end of 2010;	Yes		
	Chapter 7.1.2.1, please redraft the 2nd point: Reduction of discharged nutrient loads into the Black Sea to such levels;		No	Stated in the MoU - BSC - ICPDR
	Chapter 7.1.2.3, Basic considerations on the introduction of phosphate-free detergents, sentence 3: As for the CZ "completely" should be deleted.	Yes		
	Table 13 data do not correspond with the Figure 30 and with the statement in the second and third bullet on the previous page. In the 2 nd and 3 rd line the units are missing;		No	The Table 13 shows the changes in the N surplus while Fig 30 indicates the differences between reference situation and the changes for different scenario. The units are mentioned in the row 1 of the table as it is the header of the table and relates to the 2 rows - each of them a different scenario
	Figure 30: Check the data and compare them with real data in the Table 13;	Yes		
Fig. 31, Ban scenario: Reduction of P emissions in the CZ seems to be rather high, when having phosphate-free detergents introduced yet;		No	Based on data provided!	

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
CZ Ministry of Environment	Figure 31: The Figure does not count with pollution from the part of agglomerations (in CZ predominantly small agglomerations), which are not connected to collection systems. These pollution sources are considered to be diffuse pollution sources. Consider also the diffuse pollution from the uncollected waste water from agglomerations or to accompany the Figure 31 with the relevant explanation. Results shown in the Figure are confusing. In the case of the CZ, where the total load after the UWWTP Directive implementation will be significantly lower, but the Figure shows increase;	Yes		The first statement is right - these part of agglomerations were used as diffuse sources in MONERIS; there were not calculated as point sources. For the second part the increase is due to the use of default values - factors - for the connection rates in agglomerations for CZ in the absence of requested data. The methodologies will be harmonized and in the Annex 3 this will be reflected.
	Chapter 9: Public information spread in place and through media during JDS 2 should be mentioned in a short way;	Yes		
	Annex 1: Please substitute the www.ochranavod.cz by the www.mzp.cz ;	Yes		
	Annex 3, Chapter 6.3, Figure 11: The municipality of Olomouc is missing;	Yes		Has been added.
	Annex 14: Check the data in this Annex and harmonise the order and position of decimal points.	Yes		Performed

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Euronatur	GENERAL COMMENTS			
	Great approach toward DRBM Plan but still not Management Plan: ‘...the draft DRBM Plan is in a stage in which it is impossible to review it.’			
	The most basic document missing is the map of former and current (natural) retention areas of former floodplains in the DRB. This is key information for any RBM Plan. Not possible to develop RBM Plan without this basic information..			
	Euronatur doubts that the sentence ‘Jointly the countries of the RB have developed the Draft DRBM Plan’ is true: Most of the documents necessary for a RBM Plan are missing for Croatia. Therefore, the goal to use the ICPDR as a platform to discuss and agree on the transboundary aspect of the management of water resources has not been achieved in this draft DRBM Plan. Test was performed based on Croatian data – many documents that should have been made available by Croatia are missing.			The development of the DRBM Plan has been a joint, serious and intense work of many experts from all Danube countries and the ICPDR provided the platform for this work.
	The DRBM Plan			
	· is not referring to environmental assessment of the central Sava River			
	· is not mentioning the huge retention at the Sava and Spacva-Bosut depression			
	· does not provide information on Danube Drava Canal and its impact on neighbouring countries			
	· misses information on new dams			
	· does not describe huge potential for restoration and additional retention areas along Sava, Drava and Danube.			
	Necessary documents and actions needed for DRBMP are incomplete and missing: Map of former and current retention areas and/or floodplains in the			
	Based on HR example, following gaps are identified:			
· Map 6: For HR information concerning flooded areas is missing as well as no information in wetlands/floodplains reconnection potential and improvements by 2015;			HR revised the DRBM Plan data. The updated data will be displayed in the final Plan. Further improvements will be performed during the next DRBM Plan cycles.	

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Euronatur	<ul style="list-style-type: none"> Map: 7 Hydrological alterations HR: no data concerning hydro peaking (whole Drava is impacted), impoundments and water abstraction in the rivers 			HR revised the DRBM Plan data. The updated data will be displayed in the final Plan. Further improvements will be performed during the next DRBM Plan cycles.
	<ul style="list-style-type: none"> Map 8: No future infrastructure projects reported by HR?! 			HR revised the DRBM Plan data. The updated data will be displayed in the final Plan. Further improvements will be performed during the next DRBM Plan cycles.
	<ul style="list-style-type: none"> Map 29: No HR data on ecological prioritization. 			HR revised the DRBM Plan data. The updated data will be displayed in the final Plan. Further improvements will be performed during the next DRBM Plan cycles.
	<ul style="list-style-type: none"> For Serbia Important Birds areas are missing in Map 9; 			In consultation, RS revised the DRBM Plan data. They are now displayed in the Plan based on the provided information. Further improvements will be performed during the next DRBM Plan cycles.
	<ul style="list-style-type: none"> Recommending usage of information provided by different programmes for the Danube basin to upgrade DRBMP in section of Danube Pollution reduction programme; 			

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Hellmut Fleckseder	GENERAL COMMENTS			
	Table 1: Check consistent value on total population in the DRBD (<i>page 4</i>)	Yes		
	Data in Figure 3 are non-comparable. Suggestion to delete table 3. For details see comments document (<i>pages 2 and 4 to 6</i>)		No	The data in figure 3 have been collected and dealt with to the best of our knowledge. Figure 3 is seen as presenting valuable information.
	Table 3: COD and BOD5: Suggestion to delete Table 3. For details see comments document (<i>page 2 and 6 to 8</i>)		No	The data in table 3 have been collected and dealt with to the best of our knowledge. Table 3 is seen as presenting valuable information.
	Nutrient pollution - reproducibility and precision: Proposal that the issue of the 'uncertainty range' around a value be covered when loads are presented, discussed, fixed as targets, and when finally the reaching of target values has to be documented and proven. For details see comments document (<i>pages 2 and 8 to 10</i>).		No	This statement is valid for scientific papers, but difficult to be considered it in the frame of a product where uncertainty governs many data collection exercises
	Figure 5: Suggestion to fully disclose and openly document the values of Figure 5 (with the inclusion of uncertainty range around the values), and also a matching with the values in the Figures 32 and 34. For details see comments document (<i>page 2 and 10 to 11</i>).		No	See above and in addition figures show results using hydrological data considered for runoff (this explanation was previously given in detail with other comments formulated by HF)
Table 4 - N and P emissions: Improvement of content in Table 4. For details see comments document (<i>pages 3 and 11 to 13</i>).		No	The proposed content of the Table 4 cannot be accepted as it was not foreseen in the data collection and in the assessment methodology	

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Hellmut Fleckseder	Explanation of text Figure 9 - MONERIS: Alteration of text on page 14 (MONERIS model). Figure 8 should be improved with reference to the pathways of Nox and Nhy and a change of the narrow term 'deposition'. For details see comments document (pages 3 and 13 to 14).		No	The figure is already new - updated after being used in the daNUbs, and reflects exactly the methodology for point and diffuse sources assessment using the agreed pathways in the model and scenarios
	Sediment balance: Amendments regarding the sediment balance on page 26. Details are provided in the comment document. For details see comments document (pages 3 and 14).	Yes		At present the torrent control works and impoundments on the upper catchments in the Danube River Basin retain about 1/3 of the suspended load.
	Nutrient pollution: Comment regarding nutrient scenarios in specific agricultural scenarios. For details see comments document (pages 3 and 14 to 15).		No	Scenarios were defined and agreed by the ICPDR.
	Figures 5, 32 and 34: Several questions are raised for clarification like the issue how the loads of the 1960s with Iron Gate were derived (page 15).		No	The basis of such information can be traced in the scientific papers elaborated for the assessment of the Danube impact into the Black Sea.
	Explanation on text in Chapter 7.1.2.3.3. Estimated effects of national measures on the basin wide scale. For details see comments document (page 3 and 15 to 16).		No	Effects of the measures were estimated at the basin wide level, considering the management objectives agreed with the MoU for ICPDR and BSC
	If the issue to set 'target loads' is maintained, HF suggests the development and the agreeing upon reliable 'checking procedure' between the 'target load' and the loads discharged to the Black Sea that have at least to match these target loads (page 16).		No	Pls see above: there is no target load defined.

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Helmut Fleckseder	Conclusion from Hellmut Fleckseder what needs to be undertaken in the field of nutrient emissions:			These suggestions are partly covered by the DRBM Plan, partly they are beyond the purpose of the DRBM Plan.
	<ul style="list-style-type: none"> • My personal view: What we are really in need of to undertake in the wide field of nutrient emissions <ul style="list-style-type: none"> - All the matching and checking of loads is from my point of view of secondary importance compared with reaching the good ecological / chemical status caused the nutrient emissions into the Danubian river network and the discharge by River Danube to the Black Sea (EU WFD / EU Marine Strategy Directive). - The minimising of emissions is of primary importance. - Supposing that the gross loads of N and P generated in urban agglomerations is bigger than documented in the present Table 4 in Draftv6 it might well be that a steeper reduction of the emissions of P is possible (including the substitution of poly-P in detergents) over time than anticipated in this Draftv6 DRBD MP. In regard to nitrogen the situation is more complicated, specifically also due to the way by which <reactive nitrogen> is emitted to soil and water, and also due to the air-borne transfer of NOx-N and NHy-N across the boundaries of river basins. - In regard to <i>point source nutrient emissions</i> this requires every-day acting in regard to sewage collection (where flushing toilets and similar principles dominate), adequate waste water treatment, replacement of poly-phosphates in detergents, and also keeping excreta away from the formation of waste water (only possible where from a local planning point of view such principle can be applied; in order to be as clear as possible: this means the discarding of flushing toilets in homes as common at present, substituted by a safely operating replacement). - In regard to <i>nonpoint-source emissions</i> minimising soil erosion and leaching is mandatory with phosphorus. In regard to nitrogen and in the longer run a proper matching of the human diet (ratio of primary protein versus protein in meat) with the agricultural production potential (including the way in which renewable material for other purposes than nutrition are grown) under adequate fertilisation, and minimising the formation of nitrous oxides and reduced nitrogen (NHy) are from my point of view the most promising ones. 			

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Manfred Ganzer - Individual comment	Mr. Ganzer provided photos regarding river pollution and addresses in particular, which can be used also outside of the DRBM Plan frame like Danube Day.			
	Proposes to rather use the term 'fishbypass channel' instead of 'fish migration aid'		No	The term fish migration aid has been chosen as it is more general and includes all kind of fishbypasses and migration ramps.

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Michael Schindler - Individual comment	Concerns are expressed that the need to bring all waters to a good environmental state (as the Austrian RBM plan under discussion intends) may lead to disappearance of some valuable waterflows			The rivers that are mentioned are not part of the assessment scale of the DRBM Plan. However, those rivers are not being neglected but are reflected accordingly in the AT national RBM Plans.
	Examples are given of the Almbach in Salzburg and the Mühlbach in Baden for which it is foreseen to be made passable for fish:			
	Mr. Schindler states that this measure is probably the opposite of the intended effect. These old waterflows are well placed in the landscape and supply water to biotopes existing for several centuries - even through itself a high tech building (at their time) and not planned to be inhabitable, statistics from the channel clearing 2006 of the badener mühlbach: about 1000 brown trouts (Bachforellen), 200 Mühlgoppen, ca. 50 kg weissfische and crustaceans.			As those rivers are not addressed on the DRB A-level no respective measures are included in the Plan. However, the ICPDR recommends to contact the AT competent authority for WFD implementation (Lebensministerium) to discuss and follow-up the issue.

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
IAD	GENERAL COMMENTS:			
	· DRBM Plan is a good state-of-the-art document with realistic measures proposed.			
	· Some parts still can be improved.			
	· Add footnote, which mentions that specific problems regarding data quality and gaps do exist and that those issues will be solved later. This transparency would increase the quality of the Plan significantly.			
	· In the context of hydromorphological alterations it seems to be necessary to elucidate the selection and designation of HMWBs , particularly in the Green Corridor and Danube Delta.			Please see the DRBM Plan disclaimer regarding this specific issues.
	In general the following topics need improvement:			
	· Sediments			
	· Groundwater			
	· WWTPs			
	· Neozoa			
	· Climate Change			
	· DRBM Plan misses the principle of solidarity as relevant for fish/sturgeon migration and pollution load to BS: <i>'...it would be good for the DRBMP and WFD implementation to see/feel some more commitment of the countries for cooperation, and we think it would be beneficial in the long term as it is the foundation of many important environmental WFD issues such as the two above mentioned points (sturgeons and load), as exemplified successfully in the Rhine Commission (ICPDR).'</i>			The DRBM Plan itself is the result of a sincere commitment of the countries for cooperation. There is a fair amount of examples of applied solidarity between Danube countries, e.g. the feasibility study for sturgeon migration at the Iron Gate.
	· Printing mistakes are still included in DRBM Plan – should be corrected.			
DETAILED COMMENTS:				
· 73 specific comments have been made by IAD. Those comments are not individually listed here. They are available in the overall comment document by IAD. Each comment has been screened by the ICPDR. Those, which have not been integrated in the DRBM Plan are listed below including respective				
IAD provided 73 individual comments. Below, the comments are referred to with consecutive numbers - details can be taken from the IAD comment list.				
1	Yes			
2	Yes			
3	Yes			

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
IAD	4	Yes		
		Yes		The DBA's aim was the assessment if water bodies are at risk, possibly at risk or not at risk to fail the WFD environmental objectives 2015.. The issue 2021/2027 is not relevant for the risk assessment but only the actual water status assessment which is the validation of he risk assessment and part of the DRBM Plan. Exemption according to WFD Article 4(4) only refer to the water status assessment. In the DRBM Plan <i>in 2015</i> has been added after the WFD environmental objectives.
	5			
	6	Yes		Footnote 31 has not been deleted but adapted.
	7	Yes		Issues are already in the DRBM Plan
			No	The DRBM Plan uses different terminology and if the proposal would be considered additional explanation would be needed to justify what 1 step, 2 step etc. Also all maps, scenarios and graphs would need to be changed.
	8			
	9			This is how it is used by MONERIS methodology

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
IAD	10			Mineral fertilizers are mentioned in the context of diffuse pollution sources.
	11	Yes		
	12		No	The EU Directives terminology
	13		No	The classes have been taken as reported in the JDS 2 report. Only class 1 was assigned with the name reference condition. The total HYMO assessment in five classes is a mean of channel, bank and floodplains.
	14	Yes		Added in Chapter 7 as it is on measures: <i>By 2015, 219 fish migration aids will be constructed in the DRBD (19 in the Danube River) that should ensure the migration of all fish species and age classes according to best available techniques. In chapter 2 the term 'functional' has already been included (758 are currently indicated to be equipped with functional fish migration aids.).</i>
	15	Yes		
	16	Yes		
	17	Yes		Table has been revised.
	18	x		

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
IAD	19		No	As the entire analysis is based on it this cannot be changed anymore.
	20	Yes		As the entire analysis is based on it this cannot be changed anymore. Footnote 17 has been revised and refers to more detailed definitions in the national RBM Plans.
	21	Yes		The need to perform SEA/EIA is even part of the FIP management objective (see Chapter 7) Further, details are outlined in Annex 7.
	22	Yes, partially		Sediments and neozoa are not (yet) considered as SWMIs. Therefore, the overall chapter is entitled as 'other issues'. The name of neozoa chapter has been changed.
	23		No	It is on p.26 and in the Annex 8
	24		Yes	

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
IAD	25		No	It has been decided by the ICPDR that sediments are not a SWMI in the first RBM cycle.
	26	Yes		Footnote with link to DAISIE website and list has been included in the DRBM Plan.
	27	Yes		A reference for Map 1 has been included regarding the location.
	28		No	An explanation on selection of GWBs is provided in DRBMP. The level A RBM plan provides only that kind of information on the transboundary GWBs, which cannot be found in the national plans – this is the added value of the DRBM Plan. Information on all other GWBs is available in the RBM plans at the national level.
	29		No	The text is a reference to the DBA thus its amendment would not be correct. It has to be pointed out, the GW protection zones are set in the Danube countries in line with the requirements of the GWD .

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
IAD	30		No	The text is a reference to the DBA thus its amendment would not be correct. Dredging may have in some cases even positive effect to the connection of a GWB with the surface water as it reduces colmatation (clogging) of the river bed. Moreover, no problems concerning groundwater status deterioration caused by dredging were reported by the countries.
	31		No	GW ecology is beyond the scope of WFD

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
IAD	32	Yes		Groundwater status is the general expression of the status of a body of groundwater, determined by the poorer of its quantitative status and its chemical status. Good groundwater status means the status achieved by a groundwater body when both its quantitative status and its chemical status are at least good. GW body has good quantitative status when the level of groundwater in the groundwater body is such that the available groundwater resource is not exceeded by the long-term annual average rate of abstraction. The groundwater body has a good chemical status when its chemical composition is such that the concentrations of pollutants do not exhibit the effects of saline or other intrusions, do not exceed the EU quality standards and do not pose any significant damage to terrestrial ecosystems which depend directly on the groundwater body
	33		No	The chapter intends to provide an overview on protected areas in the DRB as an inventory.

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
IAD	34	Yes		It shows satisfactory results for physico-chemical substances, certain problems occur with the trace analysis for the priority substances.
	35	Yes		
	36	Yes		
	37		No	Formulation has been agreed.

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
IAD			No	In general, details on the approaches on HMWB designation and the assessment of the ecological status and ecological potential can be found in the respective national RBM Plans. The detailed description of each national method would go beyond the DRBM Plan scope. Please note that the joint approach on HMWB designation of the Danube River is included in the DRBM Plan outlining clear criteria of the exercise and information regarding the status/finalisation. Further, the Plan includes a statement that this exercise has not been finalised successfully as the outcomes are only partly harmonised due to the fact that agreed criteria have not been applied throughout the exercise. It can be concluded that the final HMWB designation still needs further validation based on intercalibrated/high confidence ecological status/potential results.
	38			
	39		Yes	
	40		No	This is the status for the selected GWBs, data interpretation including pressure analysis follows WFD and GWD

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
IAD	41		No	The role of management objectives and their relation to the WFD environmental objectives is described appropriately, as it is the basis of the DRBM Plan. For further information, please see the SWMI document.
	42		No	There is a lack of data on environmental and resource cost for all countries and can therefore not be not considered in the economic analysis for this RBM cycle.
	43	Yes		it is on page 52 and not 51 below the Figure 28.
	44		No	The investigation associated with this plan assumed that only P is a limiting factor, and this is already in.
	45		no	It refers to the UWWTD provision on the overall requirement of reduction of at least 75% and not to the technical performance of individual plant
	46	Yes	No	Currently this recommendation can not be imposed.
	47	Yes		
	48	Yes		Correct. The para was in but due to limited amount of pages it was shortened
	49		No	The procedure and terminology has been jointly agreed in the frame of the ICPDR. Any changes would require significant change redrafting of the DRBM Plan text and annexes.

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
IAD	50		No	Correct. The para was in but due to limited amount of pages it was shortened
	51		No	It is about the ICPDR BAT recommendation on various types of industries (2004)
	52	Yes		These issues are in, as management objectives as well in MONERIS list of national measures addressing agricultural pressures.
	53	Yes		
	54	Yes, already		A definition is already included in a blue box.
	55	Yes		The inventory is currently updated and there is also a methodology for quantification of risks included.
	56		No	The management cannot be changed anymore in the frame of the first DRBM Plan. To be added in 2nd RBM cycle. However, a sentence on functionality of bypasses has been added in chapter 7.
	57	Yes		
	58	Yes		It is already included in a blue box.
	59	Yes		Those barriers are illustrated in Map 28.

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
IAD	60	Yes		Revised text: Recognising this potential conflict, the ICPDR initiated in cooperation with the Danube Navigation Commission and the International Commission for the Protection of the Sava River Basin, an intense, cross-sectoral discussion process involving all relevant stakeholders and NGOs, which led to a "Joint Statement on Guiding Principles for the Development of Inland Navigation and Environmental Protection in the Danube River Basin"
	61		No	Respective actions will not be followed up with this Plan as no SWMI, but should be a future topic.
	62		No	Wetlands are part of Chapters 2 and 7. This structure has been commonly agreed and is not in contradiction with the important role of wetlands in the DRB, that is respectively mentioned. Chapter 8 also addresses floodplains/wetlands in relation to water quantity issues.
	63		No	This comment is a misunderstanding because the information that the countries have registers for GW use/abstraction is provided in the chapter on measures as it is a measure. Data on overexploitation are given in the chapter on status and in the related annexes

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
	64		No	
IAD	65	Yes, it is already included.		In order to achieve the WFD environmental objectives in an ecologically effective way on the basin-wide scale, it is recommended that initial measures focus on defined ecological priority river stretches.
	66		No	This is a misunderstanding of what is written in the DRBMP (the actions in Chapter 8.1 are about the links between RBM and flood risk management and not an overall concept of ICPDR flood risk management which is anyhow not addressed by the DRBMP)
	67			State of the art terminology
	68			
	69	Yes		
	70		No	The sediment chapter was shortened and text shifted to the Annex.
	71		No	Title is complete
	72	Yes		A footnote has been included in the Annex 20 making reference to the ICPDR Sturgeon Background Document, which holds details on the SAP and future sturgeon protection measures. This document has been compiled by the ICPDR Sturgeon Task Group.
	73	Yes		Information on GLOWA was added to the Annex.
		IAD provided 3 Annexes		

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
IAD	1. Invasive Species			
	2. Ecosystem services			
	3. Wetlands			
	4. Sturgeon			
	3. Climate change			

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
CZ Ministry of Transport	MoT CZ demands that specifically listed international and EU documents in relation to inland navigation are part of the DRBM Plan (see list in comments).	Yes, partly already integrated		The listed international and EU documents are part of the Joint Statement, which is mentioned in the DRBM Plan. To list all of them again in the Plan would go beyond the overall task and focus. However, the link to the JS will be emphasised stronger in the Plan.
	MoT CZ demands the integration of other facts listed in their comments (i.e. information on NAIADES, TEN-T, EU White Paper, etc.) into the DRBM Plan.	Yes, partly already integrated		The listed international and EU documents are part of the Joint Statement, which is mentioned in the DRBM Plan. To list all of them again in the Plan would go beyond the overall task and focus. However, the link to the JS will be emphasised stronger in the Plan.

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Nationalpark Donauauen	· Sediments: Integration of issues in the DRBM Plan. A strategy is needed to mitigate impacts on sediment regime and to guarantee a development towards a sustainable use of the Danube River. The DRBM Plan has to address the issue:	The DRBM Plan includes a first outline on the sediment issue, which underlines the importance of sediments and states that this issue will be followed-up on the basin-wide scale. Consideration: A blue box will be added to the DRBM Plan which emphasises issues related to sediment quantity and transport to be followed-up after the finalisation of the DRBM Plan (i.e. decision whether sediments will be a SWMI in the DRB).		
	· Basic data on sediment discharge of Danube River with special respect to the sediment balance for free flowing stretches	Already included on p.27		
	· Basic data on long term development of water levels of the Danube River with special respect to low water periods		No	Currently no sufficient data is available. However, will be followed-up in next RBM cycles.
	· Analysis of major reasons for the disturbance of sediment regime, river bed degradation and long term alteration in water level	Already included on p.27		
	· Strategy to sustain the level of the river bed and water surface		No	Ensuring sediment continuum is an appropriate task taking the mentioned issues into account in an integrated way. (p27)
	Protected areas: Many areas with high potential and priority for revitalization are situated within or nearby protected areas. The management units of these protected areas should be directly involved.	The DRBM Plan reflects those floodplains/wetlands with reconnection potential and those which will be factually connected to the adjacent water body by 2015. The WFD does not require the assessment of floodplains/wetlands in general, but only if they negatively impact the water status of an adjacent surface water body. However, due to the importance of disconnected wetlands, this issue is tackled in the DRBMP. Further, water related protected areas have been reported and illustrated as required by the WFD. The current analysis is based on data provided by the Danube countries and will be further improved in the upcoming years to ensure a complete picture in the DRB. Further, the prioritisation approach for river and habitat continuity respects protected areas as units of importance and they are considered accordingly in the prioritisation index.		

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
RO Ministry of Environment	Map 19: Suggestion is that only agglomerations with more than 10000 PE should be represented; Map 19. Would then need to be correlated with Figure 25 from Annex 3 of the DRBMP		No	Comment has been withdrawn by Romania.

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Speleological Association Exploratorii	GENERAL COMMENTS			
	· Statement that trust by this stakeholder toward Romanian authorities does not exist – therefore this stakeholder wants to stay anonymous.			
	· It is considered as necessary by this stakeholder to point out each environmental problem with an impact over the water and solutions for them;			
	DETAILED COMMENTS			
	· The DRBM Plan does not include issues on carstic areas – limestone areas regarding groundwater pollution		No	The DRBM Plan currently outlines the pressures and status of 11 tranboundary groundwater bodies. Carstic areas are not addressed in detail. However, more detailed analyses for groundwater bodies are foreseen for the next RBM cycles. Information on groundwater and carstic areas are available in those national RBM Plans where such situations are characteristic.
· Suggestion for considering European green Belt Initiative;	Yes		Text has been revised and mentions the issue in Chapter 7 (wetlands/floodplains)	
Suggestion for usage of projects performed by SAE regarding water pollution.		No	The DRBM Plan is based largely on national information. However, the information on such projects is appreciated for the future discussion.	

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
	<i>Note: The comments have been sent to AT and are being dealt with for DanubeGIS update by 14 September.</i>			
VGB POWERTECH	GENERAL			
	• Compilation of DRBM Plan is appreciated			
	DETAILED COMMENTS			
	• VGB Powertech absolutely agrees with the prioritization on main rivers and the importance of river continuity. However the importance of generation of renewable energy needs to be kept in mind in particular in relation to the Danube River. Especially important role in AT to secure energy supply.	Yes		A respective revision of data has been performed by Austria. The data included in the final DRBM Plan are based on this revision.
	• Hydropeaking is a major issue concerning security of energy supply – throughout Europe. Issue is considered strongly in the AT national RBM Plan.	Yes		
	• VGB points out that despite the fact that only a few future infrastructure projects on HYPO are listed in the RBM Plan, many project ideas are underway.	Yes		
	• Map 27 is missing.	Yes		
	Annex 13:	Yes		
	• Danube River: at the water body AT410360002, the ecological potential is designated as 5, in the Austrian RBMP this water body is designated as 3	Yes		
	• Drau: AT90377000 is designated as 2, in the Austrian RBMP it is 3	Yes		
• Mur: AT802710012 has no exemption art. 4(4), in the Austrian RBMP it has one for 2021	Yes			
• Salzach: AT304690001 and AT305360001 is reported as hmwb, both are not designated as hmwb in the Austrian RBMP	Yes			

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
VGB POWERTECH	• Map 5: Why are the hydro power plants Melk (Danube) and Villach (Drau) designated with barriers not passable for fish? Both of them have already a functional fish passage.	Yes		A respective revision of data has been performed by Austria. The data included in the final DRBM Plan are based on this revision.
	• Map 7: Why does hydro peaking occur on the Danube and south from Graz on the Mur.	Yes		
	• Map 28: There are differences between the results of the Austrian RBMP and the DRBMP	Yes		
	Danube River:	Yes		
	▪ hydro power plant Melk is already passable for fish	Yes		
	▪ hydro power plant Altenwörth: continuity until 2021	Yes		
	▪ hydro power plant Wallsee-Mitterkirchen: continuity until 2021	Yes		
	Drau:	Yes		
	▪ hydro power plant Villach is already passable for fish	Yes		
	Mur: as it is difficult to distinguish the different hydro power plants, we list all hydro power plants as in the Austrian RBMP	Yes		
	▪ hydro power plant Bodendorf-Mur/Bodendorf-Paal: after 2015 (until 2015: feasibility study)	Yes		
	▪ hydro power plant St. Georgen: after 2015 (till 2015: feasibility study)	Yes		
	▪ hydro power plant Fischen: already passable	Yes		
	▪ hydro power plant Leoben: already passable	Yes		
	▪ hydro power plant Dionysen: already passable	Yes		
	▪ hydro power plant Pernegg: already passable	Yes		
	▪ hydro power plant Laufnitzdorf: already passable	Yes		
	▪ hydro power plant Rabenstein: already passable	Yes		
▪ hydro power plant Peggau: already passable	Yes			
▪ hydro power plant Friesach: already passable	Yes			
▪ hydro power plant Weinzödl: 2021	Yes			
▪ hydro power plant Mellach: 2021	Yes			

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
VGB POWERTECH	▪ hydro power plant Lebring: 2021	Yes		A respective revision of data has been performed by Austria. The data included in the final DRBM Plan are based on this revision.
	▪ hydro power plant Gralla: 2021	Yes		
	▪ hydro power plant Gabersdorf: 2021	Yes		
	▪ hydro power plant Obervogau: 2021	Yes		
	hydro power plant Spielfeld: already passable	Yes		

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
WWF-DCP	GENERAL COMMENTS			
	· Appreciate DRBM Plan			
	· WWF requests that underlying data was made available and easily accessible in line with transparency provisions of the WFD and data policy.			ICPDR has received the data, which have been used in the DRBM Plan from the national governments. Those are stored in ICPDR databases as well as the DanubeGIS. The handing over of data to stakeholders in future (i.e. national GIS data) has to be discussed in the frame of the ICPDR. In the meantime, individual data requests can be put forward and will be followed-up. However, any requests to make the data publicly available should primarily be directed to the individual national governments.
	DETAILED COMMENTS			
	· 1.3.: Issue of sediment imbalance is not properly considered in the DBA and the identification of the significant water management issues in the DRB. More details regarding this comment see full WWF comment document.		No	The WWF document was one of the key sources for the sediment chapter in the DRBMP but from the technical point of view the WWF report provides very heterogeneous data. Decision whether sediments are a SWMI in the DRB is foreseen for next cycle of WFD.
· Stronger statement in “Key Conclusions” of DRBMP, that in next cycle of RBMP sediment extraction and sediment transport will have adequate role;		No	Sediment issues per se are now emphasised in the DRBM Plan and highlighted in a blue box. Sediment issues will be followed-up when the DRBM Plan is finalised	

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
WWF-DCP	<p>· 2.1.4.1 “River and habitat continuity interruption: WWF criticises the definition of continuity interruption mainly focusing on upstream migration, while downstream fish migration, migration of other fauna, continuity for sediment transport and connectivity between river and adjacent wetlands need to be address more properly;</p>	Yes, partly		<p>River and habitat continuity: The role of downstream migration, migration of other fauna, etc. is now mentioned in more detail in Chapter 2 resp. 7.</p> <p>Sediments: The DRBM Plan includes a first outline on the sediment issue, which underlines the importance of sediments and states that this issue will be followed-up on the basin-wide scale. Consideration: A blue box will be added to the DRBM Plan which emphasises issues related to sediment quantity and transport to be followed-up after the finalisation of the DRBM Plan (i.e. decision whether sediments will be a SWMI in the DRB). The introduction of chapter 2 mentions the following: When addressing pressures on the DRB at the basin-wide scale, it is clear that cumulative effects may occur (this is one reason why the basin-wide perspective is needed). Effects can occur both in a downstream direction (e.g. pollutant concentrations) and/or a downstream to upstream direction (e.g. river continuity).</p>
				<p>Addressing these issues effectively requires a basin-wide perspective and cooperation between countries, and is addressed in this DRBM Plan. Chapter 7.1.4.3.1 now includes the following sentence: Measures that will be undertaken intend to ensure both up- and downstream migration of fish and will also help to improve the migration of other fauna.</p>
	<p>· 2.1.4.2 “Disconnection wetlands: WWF provided in Annex 1 of their comments the WWF map on “Floodplain restoration areas and large still existing floodplain areas along the Danube and major tributaries”. WWF urges the Danube countries to reconsider sites for floodplain restoration potential nationally and to make best use of the WWF map provided.;</p>			<p>The countries were urged to respectively revise the data regarding wetland/floodplain reconnection to improve the chapter. Some updates took place and the data included in the Final DRBM Plan are based on this revision. Further improvement has to be followed-up in future.</p>

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
WWF-DCP	<ul style="list-style-type: none"> 2.1.4.4: <i>List on Future Infrastructure Projects</i> and respective map in the DRBM Plan contains obvious gaps such as the navigation projects in HU and HR. WWF believes that all projects of cross-border ecological impacts, regardless their size, need to be reported and analysed in the DRBM Plan. WWF provide in Annex 2 of their comments a list of additional FIPs to be integrated into the DRBM Plan. 			The countries were urged to respectively revise the data regarding future infrastructure projects reconnection to improve the chapter. The provided WWF list on additional FIPs has been distributed to the respective Danube countries to be considered in the revision. The final DRBM Plan information on FIPs is based on this revision. Further improvement has to be followed-up in future.
	<ul style="list-style-type: none"> 4. Entire Danube reach BG/RO is designated as HMWB. However, the crucial biological data for designation of HMWB are missing for Romania and Bulgaria. This is clearly against the legal requirements of the WFD as well as a number of the WFD CIS outputs. WWF appreciates that, according to the statements RO representatives made at the recent ICPDR Stakeholder Forum, RO is presently reconsidering this designation and WWF expects the designation to change. 			In general, details on the approaches on HMWB designation and the assessment of the ecological status and ecological potential can be found in the respective national RBM Plans. The detailed description of each national method would go beyond the DRBM Plan scope. Please note that the joint approach on HMWB designation of the Danube River is included in the DRBM Plan outlining clear criteria of the exercise and information regarding the status/finalisation. Further, the Plan includes a statement that this exercise has not been finalised successfully as the outcomes are only partly harmonised due to the fact that agreed criteria have not been applied throughout the exercise. It can be concluded that the final HMWB designation still needs further validation based on intercalibrated/high confidence ecological status/potential results.
	<ul style="list-style-type: none"> WWF criticizes that RO and BG have not cooperated regarding information exchange for the shared RO/BG Danube reach – this is against the letter and spirit of the WFD. 			Based on information provided by RO bilateral discussion/agreement took place and both countries are actively involved in the process of harmonization with each other.
	<ul style="list-style-type: none"> 5.1: Concern about the high number of exemptions according to WFD Article 4(4). DRBMP neither includes analysis of what are the main justifications for the exemptions, nor clarification of expected timetable for implementation of extended deadline exemptions. 		No	An outline on justification regarding the application of WFD Article 4(4) and 4(5) and respective implementation timelines for measures (in case of 4(4)) are part of the national RBM Plans/PoMs and are not subject of outline in the DRBM Plan.

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
WWF-DCP	<ul style="list-style-type: none"> Concerns in application of EU WFD Article 4(7) regarding FIPs – explanation of application is missing.: WWF urges the Danube countries to put these and other documents justifying the exemptions to public scrutiny and to conduct WFD Art 4(7) studies and integrated SEAs and EIAs on all FIP projects likely to cause deterioration in water status or prevent achievement of the WFD environmental objectives. 			An outline on justification regarding the application of WFD Article 4(7) are part of the national RBM Plans/PoMs and are not subject of outline in the DRBM Plan. However, a revision of information on FIPs was undertaken and are visualised in the respective map. More detailed information is part of Annex 7.
	Chapter 6: Economics			
	<ul style="list-style-type: none"> DRBM Plan does not make it clear if the infrastructure that cause impoundment of water and serve other water uses (i.e. hydropower, navigation) is regarded as a water service. WWF thinks it is a water service and that cost recovery analysis should be performed. 		No	Due to missing data a cost recovery analysis could not be performed on basin wide level.
	<ul style="list-style-type: none"> Environmental and resource costs are not taken directly into account in most countries, while WWF believe that cost recovery calculations of water protection measures should include benefits for human health, biodiversity and ecosystem services. WWF would welcome a work programme in the Plan on the development of the necessary database and methodology for such cost recovery calculations until 2015. 	yes		This issue is in the ICPDR work program for the next period
	<ul style="list-style-type: none"> WWF also expects the DRBM Plan to make a link between the analysis of pressures and impacts and the economic sectors, with the economic analysis and clear information who uses and pollutes and who pays, and how much and for what. The WFD requires that different water users make adequate contribution to the recovery of the costs in line with the polluter pays principle; 		No	Due to missing data a cost recovery analysis could not be performed on basin wide level. Improvements are foreseen within the next RBM cycles.
	<ul style="list-style-type: none"> WWF expects link between chapter 6.4 on economic control tools and chapter 7 since the latter does not seem to include economic tools, such as water pricing, as measures of Danube basin wide importance. 	Yes		This issue is only mentioned to a certain extent, but water pricing is a national issue.
Chapter 7: JPM				

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
WWF-DCP	<p>· Chapter 7.2.3. Nutrient pollution/ Summary of measures on basin wide importance: Scenarios for nutrient reduction (a) intensification of agriculture will make the region less likely to meet objectives; b) ban of P in detergents will help to achieve objectives) strongly depend on the EU policy framework and the national follow-up. WWF would favour a stronger signal (in key conclusions) towards the EC and national governments that support is needed by making the EU CAP - in particular Pillar II - directly contributing to achieve the environmental objectives.</p>	Yes		The mentioned issues are part of the conclusions but have not been intensified in text.
	Missing reference to the negative effect of FIPs on self cleaning potential and nutrient load to the Danube and the Black Sea.	Yes		If this relates to wetland, please note that they are already included in the scenario MONERIS.
	Chapter 7.1.4.1: HYMO alterations - Interruption River and Habitat Continuity			
	WWF strongly encourages the development of a mechanism for the equitable sharing of the financial burden of measures taking into consideration that the economies of Danube countries differ and measures are sometimes most needed in countries with the lowest GDP. In the long term, if environmental costs are properly internalised and measures holistically planned, WWF expects that investments into a free-flowing river system will pay for themselves.			Under the EU WFD the financing of measures is a national task. Nevertheless several funding instruments of the EU and other donors are in place. Examples of joint initiatives in the DRB do and will exist (i.e. joint workshop with IFIs in the DRB).
	<p>· WWF recommends highlighting at least one another Danube basin fish species of economical and ecological importance but of different habitat preferences such as <i>Danube Salmon</i> (Hucho hucho); This would help not only for prioritising measures but also for communicating the importance of habitat continuity to all Danube stakeholders.</p>	Yes		List of medium distance migrators are integral part of the Plan - see the newly added list of medium distance migrators in the DRBM Plan (prioritisation approach). MDMs are highly relevant in any consideration of the Plan including the fact that 'other migratory species' are mentioned in the vision and management objectives for river and habitat continuity in the DRB.
Chapter 7.1.4.2: HYMO alterations - Restoration				

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
WWF-DCP	<ul style="list-style-type: none"> The potential for floodplain restoration is much higher than countries indicate in the DRBM Plan and JPM. WWF expects all countries to set qualitative restoration targets and secure floodplain restoration sites through spatial planning measures, as for each country to prepare at least one large scale (min 1000 ha) restoration project before 2015 in order to show commitment and to generate precious know-how, which can be shared among all Danube countries. 	Yes, according to data revision of Danube countries		Based on comments received during the DRBM Plan consultation process and also in the frame of the ICPDR meetings the Danube countries have been urged to revise and update information on wetlands/floodplains for the final Plan. The data provided in the final DRBM Plan are based on this update.
	<ul style="list-style-type: none"> WWF recommends development of prioritization mechanism for floodplain restoration, modelled after methodology of prioritization measures for achieving longitudinal connectivity; 		No	This issue needs further discussion and detailed explanation. The elaboration of such a prioritisation mechanism, approach, collection of respective data and analysis needs careful development and was not feasible in the timeframe PC process and finalisation of the DRBM Plan. The issue shall be discussed as a follow up action and should be outlined by WWF.
	Chapter 7.1.4.3: Future Infrastructure Projects			
	<ul style="list-style-type: none"> To WWF judgement navigation projects in Hungary, Serbia and Croatia, along with ISPA projects in Romania and Bulgaria according to WWF violate the non deterioration clause without providing acceptable WFD Article 4 (7) studies; WWF strongly supports Joint Statement process but is concerned that positive effects will only be felt in a few years. WWF therefore suggests incorporating in the DRBM Plan the pledge of delivering high quality environmental and strategic impact assessments as well as detailed adequate WFD Article 4(7) studies with sufficient transparency and high standard public participation processes for all navigation projects. 	Yes		This is already part of the FIP management objective.
Chapter 7.7: Key conclusions				

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
WWF-DCP	WWF supports that 'knowledge and understanding of the interlinkages between the Danube loads and the ecological response in the NW shelf of the BS still need to be refined and improved' but would like to highlight that all reasons for high nutrient loads have to be considered, including HYMO alterations, Future Infrastructure Projects and Climate Change.		No	The mentioned interlinkages have so far not been investigated in the DRB. This might be a future issue during the next RBM cycles.
	<i>Chapter 8.2: Climate change</i>			
	WWFD appreciates statement that CC signals and knowledge are sufficient enough to act now and that FIPs need to be climate resilient. However, Chapter 8.2.2. does not outline clearly enough what this means in terms of work to be done over the coming years. WWF is offering support in redrafting this chapter in order to DRBMP become climate resilient until 2015. Extension by max 2 pages. WWFD lists several elements that should be included (see comments)	Yes		Revision took place with WWF support. The chapter now clearly indicates that appropriate follow-up steps for details on CC and effects need to be taken between 2009 and 2015.
	<i>WWF provided as Annex:</i>			
	<i>Annex 1: WWF floodplain restoration potential map</i>			
<i>Annex 2: Shadow list for Future Infrastructure Projects in the DRB as compiled by WWF</i>				

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Comments from Stakeholder Forum	Stakeholder involvement			
	The information and involvement of all relevant stakeholder groups is a prerequisite for the successful implementation of the DRBMP. Some stakeholders are actively involved in the work of the ICPDR. Others such as the agriculture sector are not reflected as it would be desirable. Further efforts should be undertaken to include these sectors in the dialogue. It was noted that some countries are not implementing the public participation provisions requested by the EU Water Framework Directive on the national level. The ICPDR should undertake efforts to encourage public participation on the draft river basin management plans during the upcoming 6 months. The use of English as the working language of the ICPDR is limiting the involvement of organisations. The ICPDR should think of translating more documents in national languages and better use environmental NGOs in this process.			No need for DRBM Plan integration. However, this issue will be followed-up.
	Awareness raising			
	should continue in raising general awareness about the Danube river basin. Without the better involvement of industries, the implementation of the RBMP will not be possible. The ICPDR should raise more awareness amongst the consumers to reach the industries. The awareness and outreach activities of the ICPDR should be continued			No need for DRBM Plan integration. However, this issue will be followed-up.
	Local Agenda 21 / small project fund			
	Agenda 21 is a comprehensive plan of action to be taken in every area in which human impacts on the environment. The ICPDR should see the provision of the Agenda 21 and see how this programme could be used. The ICPDR could set up a Small Project Fund for local activities, which raise awareness and support the sustainable water management (possible in the frame of the annual celebration of Danube Day			The ICPDR is not a financing institution. This proposal goes beyond the mandate and the capacities of the ICPDR."
	Environmental objective and WFD exemptions			
Rather often the environmental objectives seem not to be reached by 2015. Exemptions according to Article 4(4) and 4(5) need to be applied properly; it should be ensured that this process is transparent and justified.			No need for DRBM Plan integration. However, this issue will be followed-up.	
Phosphates				
Stakeholder felt that the impact of phosphates (P) used in households is overestimated and asked for focused work on the reduction of the use of P in the industries.		No	The scientific calculations have shown the facts as described in the DRBM Plan.	

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Comments from Stakeholder Forum	Nutrient reduction			
	According to the draft DRBMP, the target set for the reduction of nutrients can not be reached, as it depends strongly on the agricultural practices and the phosphorus ban in laundry and dish washers. It is strongly suggested that the new EU Common Agricultural Policy takes the problems resulting from the excessive use of nutrients into account. What is the ICPDR doing to ensure a proper link between the new CAP and integrated water management?	Yes		The agricultural measures are included in the scenario. Further work with agricultural sector is envisaged in the work of the ICPDR
	Hazardous substances			
	Over 100.000 substances are registered in the EU, out of which 30.000 to 70.000 are in daily use. Despite the increased knowledge that some of them are bio-accumulating, most of them are not monitored. How can the possible threat of these substances be avoided? The ICPDR should improve the monitoring schemes to detect also bio-accumulating substances. The ICPDR is asked to evaluate small scale project, which are currently carried out in several countries (such as the mercury removal of dentists in Germany) , as they might have a positive impact on the reduction of hazardous substances. The ICPDR is asked to evaluate small scale project, which are currently carried out in several countries (such as the mercury removal of dentists in Germany) , as they might have a positive impact on the reduction of hazardous substances.		No	All relevant Priority Substances are monitored within JDS including bioaccumulating substances. It is not realistic to monitor 70000 substances
	Polluter-pays-principle			
	Pollution is often transported from up-stream to down-stream countries. What is the ICPDR doing to implement the polluter-pays-principle?	Yes		This is reflected though the countries obligations to conclude emission inventories, to report on accidental pollution, etc. There is an ongoing exercise to conclude methodology for compensation during accidental pollution by UNECE with the involvement of the ICPDR. This is reflected through the countries obligations under the DRPC. In addition, some investigations are under way.

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
		Comments from Stakeholder Forum	Breaching the non-deterioration clause (Art 4.7)	
According to the draft DRBMP XX infrastructure projects are planned, but only for 18 of them existence of the requested study to fall under Art. 4.7 are indicated. What is the ICPDR doing to ensure that the requested studies are carried out for all planned projects? Does the ICPDR make the studies accessible to the public? Some infrastructure projects with a clear transboundary effect, such as the project on the Kilia arm to improve navigation are not included in the draft DRBMP. What is the ICPDR doing to receive a full picture on the national infrastructure projects? Some very controversial projects are missing in the draft DRBMP. The ICPDR is asked to especially provide information on such projects to avoid the impression that such information is hidden on purpose.				No need for DRBM Plan integration. However, this issue will be followed-up.
Monitoring / data bases				
The quality of the data has been increased over the past years, high quality monitoring substances is crucial for meaningful measures to reduce pollution. How can the ICPDR ensure the improvement of institutional and organisational capacities in the countries? To improve public access to information on the environment and thus contribute in the long term to the prevention and reduction of pollution, the European Union is setting up a European pollutant release and transfer register (PRTR). This Regulation requests the setting up of a PRTR at EU level in the form of a publicly accessible electronic database. This database needs to meet the requirements of the United Nations Economic Commission for Europe (UN-ECE) Protocol on Pollutant Release and Transfer Registers, which is valid for non EU Member States. How can the ICPDR better use these legislative provisions? How does the ICPDR ensure that the data is made available to the interested public?				The efforts of the ICPDR in improving the monitoring are described in chapter 4
Groundwater				
How is the ICPDR monitoring that the measurements have a positive impact on the groundwater? The ICPDR is asked to undertake trainings in national level for improved groundwater management. The full consideration of groundwater bodies as ecosystems and their interlinkage to surface waters should be considered in the following RBM cycles.			The ICPDR provides trainings and workshops	
Climate change				

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Comments from Stakeholder Forum	The aspect of the results of the climate change on water is only reflected to a minimum in the draft DRBMP. This chapter in the main report should be expanded (especially regarding the aspect of water quantity – floods/ droughts) and to point out for what chapters of the plan are climate change adaptation measures are needed. This should help to start developing strategies for the next WFD cycle.[1]			No need for DRBM Plan integration. However, this issue will be followed-up.
	Neozoa The aspects and impact of neozoa are not reflected enough in the draft DRBMP and an update is suggested.			No need for DRBM Plan integration. However, this issue will be followed-up.

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Comments from Stakeholder Forum	Sturgeon The ICPDR should further work on the sturgeon project.			No need for DRBM Plan integration. However, this issue will be followed-up.
	Wetlands The importance of wetlands, as well as the problem of disconnected wetlands and floodplains, is not fully reflected in the draft DRBM. This chapter should be revised, expanded and also highlight that still existing wetlands should be protected. The ICPDR could start cooperation with Stakeholder Forum environmental NGOs to raise awareness on wetlands.			No need for DRBM Plan integration. However, this issue will be followed-up.
	Sediments The problem of sediment quantity and transport is too weakly represented and the issue of sediments should be included as an SWMI in the next RBM planning cycle. It is suggested to start the investigations on sediments quantity/transport on the national level. Also the connection between hydropower production and the management of sediments should be investigated in order to find solutions for sustainable sediment management; of special importance is the sediment retention in alpine regions.	Yes		A statement in the "Key Conclusions" that the management of all forms of sediment (from fine sediment to bedload) will be given a stronger role in the next cycle of the River Basin Management Plan will be included. For this it will be essential to collect the missing data and fill the knowledge gaps.
	The impact of agriculture and land use on HYMO The impact of agriculture and land use practices on hydromorphological alterations should be considered in the future; the ICPDR should develop best practice for agriculture / land use in reference to hydromorphological alterations.			No need for DRBM Plan integration. However, this issue will be followed-up.
	Economics The economic chapter of the draft DRBMP could be expanded. What is the ICPDR doing to incorporate the costs and values of environmental services in its models? How can the ICPDR ensure a proper monitoring of the economic consequences arising during the implementation of the JPM.	Yes		The ICPDR holds a list of indicators which are already proposed and discussed.

Organisation	Comment received	Comment has been integrated in the DRBM Plan		Explanation why comment could not be integrated into the DRBM Plan
		Yes	NO	
Comments from Stakeholder Forum	Integrated planning /migration aids			
	The ICPDE should further work in the promotion of the principles of integrated planning, especially regarding new infrastructure projects. The implementation and proper functioning of migration aids should be monitored by the ICPDR.			This will be on the future work plan of the ICPDR.
	Future infrastructure projects (FIP)			
	The list of FIPs included in the draft DRBMP seems not to be complete – an update of the list is strongly suggested. In addition it is suggested to revise the criteria for FIPs of basin-wide importance in the 2 nd RBM cycle. The ICPDR, together with the EC should ensure the implementation of EC legislation regarding SEA, EIA and Article 4(7) as well as full transparency regarding FIPs and their implementation. The ICPDR should also ensure/include climate proofing for FIPs.	Yes		Has been revised - gaps still do exist