

**To: ICPDR**

## **Comments and recommendations for the Flood Risk Management Plan of the Danube River Basin**

### Chapter: 6.4.9 Bosnia and Herzegovina

**Comment:** Establish natural retentions as flood control measures In order to seriously tackle floods as a growing threat, apart from short-term technical measures, we need to consider long-term systematic solutions including the establishment of natural retention zones. Existing floodplains and wetlands are part of the natural system for flood control and used to play key role in the traditional regulation of water fluctuations. Governments in Bosnia and Herzegovina need to take notice of the high potential of natural water retention measures (NWRM) in Danube River Basin, as there are still a lot of non-urbanized areas, which can be used as natural retentions. Giving more space to rivers and increasing the area of their floodplains (flood retention areas) can enlarge wetland habitats in the region, which can in turn bring additional benefits regarding nature conservation, tourism and local economic activities, and can also recover lost ecosystem processes. For example, Central Posavina region is an extremely important flood retention basin, which needs to be protected from further development (building of flood protection structures, levees etc.). Nature Park Lonjsko polje in Croatia is a good example of a natural retention.

**Recommendation:** To change the 6.4.9 article and to re-consider natural retentions as problem solution. Even smallest possibilities for the creation of natural retentions in Sava River Basin as a part of the flood risk management have to be included into this chapter as it is done for neighboring countries. In this case, we will open the door for dialog and finding solutions for establishing the natural retentions as a part of the flood risk management structure and avoid blockade of those ideas and possibilities in future.

### Annex 2 FRMP Measures

**Comment:** In a table 3. Measures reducing the existing risks for Bosnia and Herzegovina only structural measures were mentioned which clearly shows that "water sector" in both entities are under the big influence of the construction and hydropower lobby because they did not even consider non-structural measures such as natural retentions.

**Recommendation:** To include the water retention and revivification of wetlands and flood pastures along the Sava flood plain as well as to introduce awareness rising activities regarding necessity of the settlements removal from flood risk areas. To examine the possibilities for the smaller retentions in upstream parts of the Sava River tributaries in order to use them as a "first aid" measures for downstream disaster reductions.

**General observation and conclusion:** Most of the data and inputs in the FRMP from Bosnia and Herzegovina side comes from Federation and not representing the stands of the experts and public opinion. The public participation and consultation process is not organized well and not considered, while on the other side it is obvious that stands and positions in this document clearly reflects the hydropower and construction lobby interests.

On behalf of the ACN BiH:

Viktor Bjelic  
Coordinator