1st Danube Flood Risk Management Plan - – Reply Overview Table

Nr	Ch.	p	Organisation	Comment	Implementation of the comment
1	3	12	**GWP**	In the Annex of Flood Directive determines the main elements of the flood risk management plan. In Part I. Components of the first flood risk management plans, par. 2. it is written that one of the elements is: " flood hazard maps and flood risk maps as prepared under Chapter III, or already in place in accordance with Article 13, and the conclusions that can be drawn from those maps;" Chapter 3 Flood hazard maps and flood risk maps of the FRM Plan does not contain a conclusions section. It would be valuable to compile basin wide conclusions from these maps.	Conclusions section added to the chapter 3
2	4.3	16	**DEF**	In the chapter of objectives resilience was defined only for society: "To improve its resilience against flooding the society has to have an adequate emergency response during and immediately after flooding to limit adverse effects and it shall recover to regain a standard of living comparable to the pre-flooding status." The resilience issue comes from an ecological point of view. Concerning flooding it would mean that flooding in zones at rivers or in floodplains where it is not harmful for human health and properties ecosystems are as a whole in a more stable and less vulnerable state adjusted to river and flooding ecological terms. So we would like to propose the addition of a sentence concerning the resilience of ecosystems. The proposal is to add: "The promotion of natural water retention improves the resilience of ecosystems adjusted to flooding and limits adverse effects for nature."	The proposed sentence has been added to the chapter 6
3	5.2	18	**DEF**	Danube Flood Risk Management Plan, not only PA 5 Environmental Risks, but also PA 4 Water Quality and PA 6 Biodiversity, landscapes, quality of air and soils could help to enhance and refine measures. The common measures together with PA 6 could include the promotion of Green Infrastructure. We would like to suggest and to add (after the sentence with Priority Area 5): " Cooperation with Priority Areas 4 Water Quality and 6 Biodiversity, landscapes, quality of air and soils can help to enhance and refine measures especially in the fields of water protection, biodiversity and Green Infrastructure."	The proposed sentence has been added to the chapter as suggested
4	6.3	37	**DEF**	"Natural water retention measures are measures that aim to safeguard and enhance the water storage potential of landscape, soil, and aquifers, by restoring ecosystems, natural features and characteristics of water courses and using natural processes. They support Green Infrastructure by contributing to integrated goals dealing with nature and biodiversity conservation and restoration, landscaping, etc. NWRM provide multiple benefits, including flood protection, water quality and habitat improvement. They are adaptation measures that use nature to regulate the flow and transport of water so as to smooth peaks and moderate extreme events (floods, droughts, desertification). They reduce vulnerability of water resources to climate change and other anthropogenic pressures. They are relevant both in rural and urban areas." The definition is good. To foster synergies of flood protection, biodiversity, water protection and Green Infrastructure we would propose to add after the sentence on Green Infrastructure: "Promoting river corridors for flood protection, habitat connection and nutrients reduction for water quality supports many synergies."	The proposed sentence has been added to the chapter as suggested

5	6.4.9, BA	43	**Aarhus Centers BA**	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. 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 neighbouring 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.	The deadline for completing the Flood Risk Management Plan in BA has not been defined, and BA is generally at this point quite far from it. At present the Terms of Reference of the project to produce flood hazard maps and flood risk maps in BA are being drafted. This project will be realized with support of WBIF and will last 2 years. For the DFRMP BA submitted the measures which have been officially discussed earlier at the workshop of the Sava Commission. It is clear that once the flood risk management plan for BA is under development, it will contain much more measures both structural and non-structural, and the possibility of building natural retentions will be discussed in detail. In chapter 6.4.9 of DFRMP general situation was described in terms of space and morphological conditions. Situation along the Sava River in the Federation of Bosnia and Herzegovina is not very appropriate for the application natural water retention because there are objects of flood protection systems (embankments, pumping site, canal network) in these areas. As regards other major watercourses in BiH on the Sava River Basin these are generally in narrow valleys and very populated and urbanized so there is hardly any possibility to create large natural retention basin. Nevertheless, the issue of natural water retention will be included in the regional plans which will be developed in future and also addressed in the Flood Risk Management Plan for BA.
6	7	45	**GWP)**	This chapter provides concise information by countries about the cost-benefit analysis method they used. As the information in most cases is very general it is recommended that references or links to documents available on the internet be given for the methods mentioned.	The available links were added to the chapter.
7	-	53	**GWP**	The numbers referred in the text in this paragraph does not correspond with the numbers cited on page 109 in the top paragraph and in Table 35 in the DRBD MP discussing the same issues.	The corresponding numbers will be taken from the final version of DRBMP
8	-	55	**GWP**	Numbers in Table 1 do not match with the numbers in Table 35 of DRBD MP, which has the same content. Harmonisation of the two tables and the corresponding texts is needed.	The corresponding numbers will be taken from the final version of DRBMP
9	8.4	56	**GWP**	The information that countries provided has no similar structure. It is recommended to apply a kind of template with defined information elements (such as institutions involved in the implementation; legislation applied; harmonisation steps, etc) and amend the information wherever it is needed and restructure them according to the elements of the template.	There was no template agreed for collection of information for the chapter 8.4. The use of such template will be considered for the update of the flood risk management plan.

10	A2	-	**Aarhus Centers BA**	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. 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.	The deadline for completing the Flood Risk Management Plan in BA has not been defined, and BA is generally at this point quite far from it. At present the Terms of Reference of the project to produce flood hazard maps and flood risk maps in BA are being drafted. This project will be realized with support of WBIF and will last 2 years. For the DFRMP BA submitted the measures which have been officially discussed earlier at the workshop of the Sava Commission. It is clear that once the flood risk management plan for BA is under development, it will contain much more measures both structural and non-structural, and the possibility of building natural retentions will be discussed in detail. In chapter 6.4.9 of DFRMP general situation was described in terms of space and morphological conditions. Situation along the Sava River in the Federation of Bosnia and Herzegovina is not very appropriate for the application natural water retention because there are objects of flood protection systems (embankments, pumping site, canal network) in these areas. As regards other major watercourses in BiH on the Sava River Basin these are generally in narrow valleys and very populated and urbanized so there is hardly any possibility to create large natural retention basin. Nevertheless, the issue of natural water retention will be included in the regional plans which will be developed in future and also addressed in the Flood Risk Management Plan for BA.
11	-	-	**Aarhus Centers BA**	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.	The inputs from BA to DFRMP come from the institutions officially responsible for the implementation of the EU Floods Directive and they respect the need of coordination with the WFD.
12	-	-	**GWP**	A list of Acronyms, Tables, Figures, Maps and Annexes would be needed	A list of Acronyms, Tables, Figures, Maps and Annexes was added.
13	-	-	**GWP**	In the text several reports, documents, publications are mentioned, but there is no reference cited for them. Consequently, there is no reference list in the plan, which would be needed.	Relevant links will be provided in the footnote.
14	A3	-	**GWP**	the information for Hungary needs updating. It is advised to check other countries as well	All countries checked information provided in the Annex 3 and the necessary corrections were made.
15	A4	-	**GWP**	AT and DE provided information only in German. Is should be translated to English as it is the case of other countries where information was primarily given in national language.	English version of the information from DE and AT was inserted into the Annex 4
16	-	-	**NGOs**	Floodplains earmarked for restoration under the second Danube River Basin Management Plan should have been analysed and considered as first choice for flood risk management measures under the Flood Risk Management Plan while the new River Basin Management Plan should have added restoration sites of particular value for flood retention (and of particular biodiversity value). WFD and biodiversity experts should have been consulted on how structural flood risk mitigation measures where they are necessary can be optimized. Instead, both Plans refer to Natural Water Retention Measures in a rather vague manner so far.	Next to the chapter on measures DFRMP contains a separate chapter on NWRM which is a clear demonstration of importance of this issue. In the next flood risk management planning period the floodplain restoration potential and its use for flood retention will be explored.
17	-	-	**Lower Austria**	**SONDAR SK-AT:** Key aspect of the project: Soil as an indicator of flood occurrences Soils have a long-term memory, and they store the history of their formation like an archive. This stored information can be used in order to deduce the occurrence of rare historical floodings. Therefore soils can be used in order to localize potential flooding areas. Important aims of this project were the preparation of soil maps as an instrument of forecasting and sensitization and for creation of awareness.	A text box on SONDAR project has been added to the plan.

18	-	-	**Lower Austria**	**SONDAR CZ-AT:** Key aspect of the project: Improving quality of soil by raising soil awareness. Soil is the starting point for all life on Earth, and it provides for more than 90% of our food. It is threatened in various ways: Building blocks and excessive exploitation in favourable conditions, neglect and give-up in unfavourable conditions. A general awareness of the population seems to get lost and does no longer correspond to reality, respectively. Soils are living systems, which can only perform their functions within the ecosystem and for man, if their qualities are largely intact. A sustainable cultivation of land in the Danube region can decisively contribute to soil fertility, preventive flood protection, and to the use of soils as carbon storage tanks – and thus to climate protection.	A text box on SONDAR project has been added to the plan.
19	-	-	**Lower Austria**	**SONDAR HU-AT:** Key aspect of the project: Soil as a filter for pollutants, soil as a reservoir for carbon. In the province of Western Hungary the topics "soil as a filter" and "soil and groundwater" are very important. Storing and filtering of nutrients and pollutants are closely linked with the production of save food as well with the protection of groundwater and drinking water and with the possibility of reducing soil erosion by area-wide soil protection. Main aim of the project is the improvement of soil protection regarding quantitative and qualitative aspects by means of awareness raising and realization of paradigms on communal level. Another aim is to establish well trained soil ambassadors.	A text box on SONDAR project has been added to the plan.
20	-	-	**Lower Austria**	**ELSA European Land and Soil Alliance:** The European Land and Soil Alliance (ELSA) e.V. is an association of cities, towns and rural districts together with comparable local authorities with the aim of making an active contribution to sustainable soil use. The members of ELSA are committed to a determined approach in terms of soil protection and spatial development, particularly on a local and regional level, and promote an awareness for soil issues in the local authorities. Cooperation among the local authorities in the European countries and over and beyond their national frontiers with all partners in the alliance opens up new chances and is at the same time a challenge for responsible use of soil in Europe. Currently almost 200 members in 11 European countries (UK, NL, D, CH, A, IT, CZ, SK, HU, RO, BG) – manly cities and communities – are engaged in ELSA. Due to its engagement in the Working Community of Danube Region Countries the province of Lower Austria is an important hub to our Eastern members, and there exist valuable cross-connections to the European Strategy of the Danube Region and to other conventions and organizations.	Information about the European Land and Soil Alliance was taken note of, but it was not found relevant for the DFRMP. Sufficient links to soil issues and their relation to flood risk management are provided in the DFRMP.
21	-	-	**Lower Austria**	**Pilot project „Management of soil organic matter and regional production of biofertilizers"** This project aims at optimizing the management of soil organic matter and biogenic wastes in order to preserve soil fertility as a pivotal resource. The major focus is to establish humus balancing using the humus balancing software tool in agricultural practice and to optimize the production of regional biofertilizers. Specific goals are to create new products for the optimum use of biogenic wastes and biofertilizers and to develop a catalogue of measures for sustainably safeguarding soil humus and soil fertility.	Information about the project „Management of soil organic matter and regional production of biofertilizers" was taken note of, but it was not found relevant for the DFRMP. Sufficient links to soil issues and their relation to flood risk management are provided in the DFRMP.
22	A2	-	**Wasser-und Schiffahrtsverwaltung des Bundes**	Measures in accordance with the FRM Directive on a federal waterway require the approval of the WSV, especially measures involving physical interventions to regulate flows, such as the construction modification or removal of water retaining structures and which have a significant impact on the hydrological regime.	Information by Wasser-und Schifffahrtsverwaltung des Bundes/Generaldirektion von Wasserstrassen und Schifffahrt was taken note of, there is no formal need to include it into DFRMP

23	-	-	**WWF**	The main text of the plan includes new approaches for flood risk mitigation, especially highlighting natural water retention measures (NWRM) contributing to achieve good status of water bodies which we fully support and underline its importance. Also acknowledge some countries' efforts toward this (e.g. Austrian and German examples). The annex listing the measures planned by the countries is not reflecting to the same degree this approach and acceptance of WFD compatible measures or NWRM which expressed in the main text. We assume this is not only a question of formulation of the text, but reflects the real status in the countries. Using NWRM where possible is considered in theory, but not yet translated into action. In the coming years during the implementation of the FRMPs this will be one of the challenges for the planners, relevant authorities and stakeholders.	Annex 2 reviews types of measures and not the detailed measures, which can be found in national plans. In line with the EU catalogue of measures the NWRM are listed under Natural flood management / runoff and catchment management type of measures (Measures to reduce the flow into natural or artificial drainage systems, such as overland flow interceptors and / or storage, enhancement of infiltration, etc and including in-channel , floodplain works and the reforestation of banks, that restore natural systems to help slow flow and store water.). The necessity to implement the WFD compliant measures is also demonstrated by the fact that the EU and national funding schemes require this as a prerequisite for providing the grant. DFRMP highlights the new approaches for flood risk mitigation, in particular the natural water retention measures (NWRM) contributing to achieve good status of water bodies giving a clear signal to flood managers in DRB.
24	-	-	**WWF**	The shortage of financial resources and capacity call for a prioritization approach to define the most effective and urgent measures. Non-structural flood risk mitigation measures - in case of interventions on the field - we suggest to consider as a principle, that NWRM (which helps to achieve WFD objectives) should be assessed first as priority for flood risk mitigation. If these measures cannot fully reduce the flood risk to the required level, then traditional engineering measures could be considered as supplement, ensuring combined solutions. Keep purely structural, traditional engineering measures with deterioration potential to a minimum.	In chapter 6 it is stated that green infrastructure measures shall play a major role in sustainable flood risk management in the Danube River Basin District. Win-win solutions need to be the focus of flood risk management (integrated approach providing multiple benefits). Based on an earlier WWF comment and on the FP EG recommendation an extensive text on floodplain restoration prioritization describing the activities of the HYMO TG with a recommendation for flood managers to take these activities into account has already been inserted into DFRMP.
25	-	-	**WWF**	Those measures which incorporate the integrated approach and have multiple benefits (like biodiversity improvement, flood mitigation, nutrient reduction, drought/water scarcity mitigation, climate change adaptation, etc.) should be analysed as priority. Such actions need to be included in other relevant plans as well (e.g. RBMPs or Natura2000 management plans).	The prioritization criteria were agreed two years ago and at present it is too late for any changes. The proposal will be discussed in the next flood risk management planning period.
26	-	-	**WWF**	We would like to underline the importance of the well balanced communication of the flood issue toward the public. Flood waves are not only a risk, a negative phenomenon, but a positive service, natural resource for people. From the ecological point of view, floods are vital. Floods supply floodplains, connected wetlands with water ensuring fish reproduction, nutrient reduction, biomass, grazing areas, etc. which are crucial ecosystem services.	Based on an earlier WWF comment and on the FP EG recommendation a respective text has already been inserted into DFRMP // Comment was also discussed at the 18th PP EG Meeting. Understood to be general with no integration into the DFRMP necessary. Communication work of the ICPDR is elaborated in detail in Chapter 12 of the DFRM Plan. Ongoing communication work of the ICPDR is steered by the Public Participation EG, which includes public information on issues raised here. A public brochure on the two management plans in under preparation.
27	-	-	**WWF**	Natural depressions on the floodplains should be considered first for flood retention with nature friendly land uses (fish production, grazing of meadows, reed or other biomass production, forestry, etc.).	Based on an earlier WWF comment and on the FP EG recommendation an extensive text on floodplain restoration prioritization describing the activities of the HYMO TG with a recommendation for flood managers to take these activities into account has already been inserted into DFRMP.
28	-	-	**WWF**	In most of the cases building of artificial emergency reservoirs for flood mitigation are not appropriate solutions for the problem. These new infrastructure (reservoirs) don't target to solve the root cause of the problem and have high investment and high maintenance costs. The root of the problem is the improper land use on the former floodplains (morphological floodplain), where land use doesn't adapt to the natural and geomorphological conditions, but an artificial and costly status is maintained. The EU agriculture subsidies (CAP pillar I) maintain intensive agricultural practices also on areas which are not profitable, but the subsidy works against changing toward more nature friendly land use. Natural depressions on the floodplains should be considered first for flood retention with nature friendly land uses (fish production, grazing of meadows, reed or other biomass production, forestry, etc.).	The objective of the EU Floods Directive is to reduce flood risk, and constructing of flood retention reservoirs is one of the most appropriate measures to reduce the flood risk. Based on an earlier WWF comment the recommendation on land use and on the need of a good cooperation with the agricultural sector has already been inserted into the Chapter 8 on Coordination with WFD

29	-	-	**WWF**	Improvement of intersectorial working relationship with the agriculture sector and better allocation of CAP funds (strengthen CAP pillar II.) are strongly recommended and supported. Shifting of CAP funds to more effectively finance WFD compatible measures to achieve good status also ensures flood risk mitigation with natural water retention measures.	Based on an earlier WWF comment the recommendation on land use and on the need of a good cooperation with the agricultural sector has already been inserted into the Chapter 8 on Coordination with WFD
30	-	-	**WWF**	Some measures are too general, or there is no clear connection of the concrete measure and the measure category. We suggest specifying or better describing those for avoiding misunderstandings, misinterpretations. (E.g. under Hungary: " leading the floods into other river basin". We don't really understand this measure, in particular from catchment management point of view.)	Annex 2 reviews types of measures and not the detailed measures, which can be found in national plans. The measures which were found by WWF unclear were rephrased.
31	-	-	**WWF**	From the formulation of some measures it's not clear if restoration of former floodplains is also considered or only restoration of active floodplains. Also a question if land use change includes floodplain restoration or not.	The statements have been rephrased to address the former floodplains as well
32	-	-	**WWF**	We found some controversial measures connected with Hungary (e.g. removal or relocation of dykes and heightening or reinforcement of dykes under the same cell). We suggest to set up criteria when the different measures are recommended to apply, or set up priority list among measures.	All measures in Hungary indicated by WWF were rephrased. The criteria will be discussed in the next river basin management planning period.
33	-	-	**WWF**	Removing obstacles, clearing flood conveying channels can work against biodiversity and WFD objectives, thus careful planning with proper intersectorial negotiations are crucial. (E.g. cutting of natural floodplain forests are not supported, but clearing invasive species from the floodplain like Indigo bush *Amorpha fruticosa* are in line with environmental objectives.)	The FP EG discussed this earlier WWF comment and emphasized that this is not about clearing floodplains but about maintaining conveyance capacity. The comment was not accepted.
34	M1	-	**WWF**	About flood hazard is very similar to the maps that show the river basin before river regulations. It means that the restoration and floodplain reconnection capacity is still very big on the river basin. The land use change and regulation (ban) of building new infrastructure on these areas are very good tools to reduce flood risk, and parallel restoration works have very big potential.	Flood hazard map shows the areas, in which floods with medium and low probability can occur. Because in these areas there is often urban, industrial and other development they cannot be used for flood retention. In the next flood risk management planning period the floodplain restoration potential and its use for flood retention will be explored.
35	M5	-	**WWF**	We suggest indicating with a different colour or on a different map the areas, where protected areas/ N2000 sites are overlapping. This is not clear on this map thus the main information is lost.	The map 5a indicates by red colour the overlap of flood hazard areas with low probability with protected areas thus it shows exactly what is proposed by this comment.
36	-	-	**WWF**	The designation of flood hazard areas should be better harmonized. The state borders are also borders for flood hazard areas on the Croatian-Slovenian, Croatian-Austrian border, although rivers don't change when crossing the state borders. Countries evaluated the level of the hazard differently on the same river.	This problem is known to the ICPDR and it requires further cooperation between countries. It has been addressed by the CeFrame project and is planned to be addressed by the project "Development of elements of flood risk management plans for transboundary sub-units of common interest" which is listed in the DFRMP Annex 2.
37	-	-	**WWF**	As a principle, apart from non-structural measures, in case of field interventions NWRM (which help to achieve WFD objectives) should be considered first as priority for flood risk mitigation. If these measures cannot fully reduce the flood risk to the required level, then traditional engineering measures could be considered as supplement, ensuring combined solutions. Keep purely structural, traditional engineering measures with deterioration potential to a minimum.	In chapter 6 it is stated that green infrastructure measures shall play a major role in sustainable flood risk management in the Danube River Basin District. Win-win solutions need to be the focus of flood risk management (integrated approach providing multiple benefits). Based on an earlier WWF comment and on the FP EG recommendation an extensive text on floodplain restoration prioritization describing the activities of the HYMO TG with a recommendation for flood managers to take these activities into account has already been inserted into DFRMP.
38	-	-	**WWF**	More concretely, it is suggested to overlay of Flood hazardous and risk maps with RBMP floodplain restoration maps in order to do the following: - From a flood risk management perspective, analyse and consider floodplains earmarked for restoration under the DRBMP as first choice flood risk management measures. In places	The FP EG discussed these earlier WWF comments and agreed as follows: • Bullet points 1 and 2 are addressed in an earlier response by the ICPDR FP EG to the WWF comment which reads: "what is suggested by the WWF comment is the state of the art approach taken by the Danube countries. The countries are in the first cycle of flood risk

				where floodplain restoration is not sufficient or not an option, other flood risk management solutions such as polders, reservoirs on the floodplain should be planned in a way that they support the WFD objectives e.g. by maintaining or increasing the area of wetlands within the polder and adapting the land use practises according to it (like grazing wet meadows, managing reed). Base these decisions on a cost-benefit analysis or multi-criteria analysis that give sufficient weight to WFD benefits (like nutrient reduction, fish production, biodiversity). - From a water management perspective, make those floodplain restoration sites a priority for action that respond best to flood risk mitigation objectives. Reconsider adding areas to the list of floodplain sites to be reconnected if they are urgently needed flood retention areas. Base these decisions on a cost-benefit analysis or multi-criteria analysis that give sufficient weight to flood retention benefits. - Land use values at risk from flood damage should be scrutinised in order to analyse whether (harmful) subsidies favour a land use type that is not favourable to WFD implementation and whether a shift of subsidies to WFD compliant land use makes a NWRM profitable. For example, wheat production on a floodplain area not favourable for this type of production might only be profitable because the farmer receives CAP funds. This pushes up the value of land and thus might favour a polder solution when in fact a floodplain restoration measure would have more benefits from a WFD and FD perspective. Shifting CAP funds to measures that support farmers in changing their land use in response to restoration might provide a higher return both for the individual farmer and society. - Additionally land use change and the wide range of landownership requires special knowledge on proper stakeholder involvement for which trainings and capacity building for planners and responsible bodies are necessary. - The communication of flood related issues should be well balanced . Flood is not only a risk, but a positive , natural phenomenon, a service and resource for people and nature. From ecological point of view floods are vital. Floods supply floodplains, connected wetlands with water ensuring fish reproduction, nutrient reduction, groundwater recharge, etc.	management so it may not be obvious they are following these principles". Text was inserted into DFRMP on floodplain restoration prioritization describing the ICPDR activities in response to pressures from hydromorphological alterations with a recommendation for flood managers to take these activities into account. • The recommendation on land use in the bullet points 3 and 4 has been inserted into the Chapter 8 on Coordination with WFD. • The recommendation in the bullet point 5 has been accepted and the text of the DFRMP has been rephrased indicating positive effects of high probability floods.
39	-	-	**WWF**	Suggested checklist for main flood risk mitigation measures that contribute to WFD objectives: - restoration of former wetlands/floodplain areas, increasing their size, demolition of existing dykes (like summer-dykes) or dyke relocation - creation of new wetlands - restoration of meandering capacity of rivers - restoration of side-branches - restoration of oxbows and lakes, use them for water storage - elimination of invasive species on the active floodplain - reforestation on catchment - retention of water, precipitation and sewage - controlled inundation of morphological floodplains, natural depressions outside the flood protection dykes - regulations in land use (e.g. no new buildings on floodplains, increase area of grasslands/wet meadows next to the main channel instead of low profitable arable lands) - change land use that is resistant to floods (e.g. to grasslands/wet meadows on the floodplain instead of sensitive crops) - modify agriculture subsidy systems in order to ensure incentives for nature friendly land	The measures suggested by the checklist were inserted into the Chapter 8 on Coordination with WFD as examples of flood risk mitigation measures that contribute to WFD objectives. They are put for consideration to the flood managers.

				use change (e.g. change to wet meadows, grazing areas like grasslands, reed management, bee keeping)	
40	-	-	**Stakeholder WS**	Natural water retention should be promoted in both international and national plans	DFRMP contains a separate chapter on NWRM which is a clear demonstration of importance of this issue. In the next flood risk management planning period the floodplain restoration potential and its use for flood retention will be explored.
41	-	-	**Stakeholder WS**	Improve communication with AGRI sector (incl. PP)	In chapter 8 it is mentioned that a good cooperation with the agricultural sector is another important prerequisite for ensuring synergies between land use, flood risk management and river basin management.
42	-	-	**Stakeholder WS**	Some issues shall be addressed stronger in national plans (deforestation increases flood risk, organic farming has retention potential, missing local land use plans pose gaps for flood retention): inserting these into DFRMP would be helpful to promote development at national level	All these issues have been stressed in DFRMP.
43	-	-	**Stakeholder WS**	Sedimentation in HPP reservoirs – spilling needed for retention capacity - non-compliance with WFD objectives	There is a project planned for the next flood risk management planning period on this issue.
44	-	-	**Stakeholder WS**	Natural water retention measures shall be applied (e.g., in areas without settlements along Sava). Natural water retention is a better environmental option in flood risk management, which provides win-win solutions for the implementation of WFD and FD and it should be strongly promoted on both national and international level	DFRMP contains a separate chapter on NWRM which is a clear demonstration of importance of this issue. In the next flood risk management planning period the floodplain restoration potential and its use for flood retention will be explored.
45	A2	-	**Stakeholder WS**	Priority be given to horizontal cross-sectoral measures (WFD, FD, water scarcity), more NWR measures shall be presented in the Annex 2	Prioritization criteria were agreed two years ago, it is not possible to change them at the end of the planning cycle. This issue will be addressed in the next planning cycle.
46	-	-	**Stakeholder WS**	Measures addressing flash floods shall be more promoted	DFRMP does not distinguish between fluvial, pluvial or flash floods. The flash floods are relevant for some countries only and DFRMP deals with basin-wide aspects. More analysis of sources of flooding will be carried out in the next flood risk management planning cycle.
47	-	-	**Stakeholder WS**	Measures targeting floods in urban areas and the related urban planning methodology shall be upgraded to reflect current trends	DFRMP does not distinguish between fluvial, pluvial or flash floods. The flash floods are relevant for some countries only and DFRMP deals with basin-wide aspects. More analysis of sources of flooding will be carried out in the next flood risk management planning cycle.
48	-	-	**Stakeholder WS**	Information about influence of floods on soil from the AT/SK project shall be included either as a text box or as a subchapter on soil retention into the chapter on NWR	A text box on SONDAR project has been added to the plan.

49	-	-	**Stakeholder WS**	Putting more stress to potential of afforestation, organic farming and availability of local land use plans (IAD to contribute)	All these issues have been stressed in DFRMP.
50	-	-	**Stakeholder WS**	Better using synergies between Flood Risk Management and improving river hydromorphology (example Lonjsko polje), i.e. by reconnecting wetlands/floodplains; more areas with potential for re-connection are expected to be in place – countries were asked to check and updated the data; clarification of ‚no net-loss principle', not only to maintain ‚status-quo' but to expand reconnected wetland/floodplain areas	In the next flood risk management planning period the floodplain restoration potential and its use for flood retention will be explored.
51	-	-	**Stakeholder WS**	Preparedness to communicate floods to the public and once they come, we should immediately communicate them, not wait for a week or more to do so	Floods are communicated to public not only when they come but the flood forecasting systems provide warnings to the population before the floods occur. This is a standard procedure in all Danube countries.
52	-	-	**Stakeholder WS**	Better communicate the meaning of low probability on hazard map to public	DFRMP uses the language of flood directive. Any changes on map can be confusing. An explanation was added into DFRMP that when 1000-year flood occurs it does not mean that another 1000-year flood could not happen next month.
53	-	-	**Stakeholder WS**	Current description of natural water retention in BA should be revised to promote this issue	In chapter 6.4.9 of DFRMP general situation was described in terms of space and morphological conditions. Situation along the Sava River in the Federation of Bosnia and Herzegovina is not very appropriate for the application natural water retention because there are objects of flood protection systems (embankments, pumping site, canal network) in these areas. As regards other major watercourses in BiH on the Sava River Basin these are generally in narrow valleys and very populated and urbanized so there is hardly any possibility to create large natural retention basin. Nevertheless, the issue of natural water retention will be included in the regional plans which will be developed in future and also addressed in the Flood Risk Management Plan for BA.