



President: Thomas Hein

## **Statement to the updated Danube River Basin management Plan 2015**

The association IAD is an active network of scientists active in the Danube river Basin since 1956. Currently the IAD board has country representatives in 12 Danube countries and has active expert groups in 12 topics covering major ecological and management fields.

IAD is an observer in the ICPDR expert groups and regular meetings, followed and contributed to the development of the DRBMP. We highly appreciate the progress made, the huge efforts and capacity invested in data, information collection, discussions among different experts and representatives of the countries and formulation of the current draft plan.

In our statement paper we intent to point out several aspects for a further improvement.

### **Chapter 4.1.4 Designation of heavily modified and artificial water bodies**

In case of several water bodies – like for example the Drava upstream Barcs and the Lower Danube section (downstream Iron Gate and upstream the Danube Delta) – the designation as HMWB would need some more explanation how this classification is justified and compares to the general classification approach. Existing assessments as from the JDS 3 (for the Lower Danube) suggest that these stretches are of high quality regarding hydromorphology. While in case of Drava hydro-peaking or flood protection dykes along the Lower Danube are existing, a further justification is needed to explain the current classification.

**A revision of this classification is recommended.**

### **Chapter 6.1 Interlinkage between river basin management and flood risk management**

As a principle to follow also EU wide recommendation, NWRM (which help to achieve WFD objectives) should be used as a key principle for a sustainable flood risk mitigation approach and improved implementation. If these measures cannot fully reduce the flood risk to the required level, then traditional engineering measures could be considered as supplementary measures, ensuring combined solutions with the aim to limit traditional engineering approaches to a minimum.

In more detail, it is suggested to overlay the already compiled maps describing Flood hazardous and risk maps with RBMP floodplain restoration maps in order to achieve the following from a water management perspective:

Link those floodplain restoration sites that respond best to flood risk mitigation objectives to provide well-defined priorities for action. As a methodological approach we recommend to use cost-benefit analysis or multi-criteria decision aid approaches that give sufficient weight to flood retention benefits.

### **Chapter 6.3 Interlinkage between river basin management and nature protection**

The Danube River is the most important element of green-blue infrastructures and migration corridor connecting key habitats in Europe providing a large variety of biodiversity (aquatic and terrestrial). Efficient river basin management can support achieving the aims of nature protection in riverine landscapes and adjacent landscape elements by avoiding further deterioration, restoring basic river and wetland functions and balancing land use patterns and development.

Strategic sustainable development and landscape planning in river corridors and space along rivers considering the changing interlinked aquatic and terrestrial environments are instrumental to guarantee sustainable approaches for future uses to protect and conserve biodiversity, habitat connectivity, flooding and water protection, erosion control and by that enhance climate change adaptation potential. In cooperation with EUSDR Priority Area 6, environmental NGOs and other stakeholders including the agricultural sector, ICPDR can deliver core elements and a significant share of information and collaboration on green infrastructures and other EU recommendations, biodiversity aims and improved habitat connectivity in the DRB.

### **Chapter 6.6 Sturgeons in the Danube River Basin District**

We acknowledge and highly appreciate the emphasis on the conservation of Sturgeon species in the DRB and well-structured text in the draft plan addressing mapping activities and conservation actions. In line with the issues as outlined in the strategic documents of the DSTF all aspects including support for a more effective enforcement and a reduction of poaching pressures during the bans by developing alternative income options for fishermen.

In connection with navigation fairway improvement, emphasis on measures to protect Sturgeon habitats should be highlighted and discussed.

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