

**Danube River Basin Management Plan 2015 – Reply Overview Table**

Nr	Ref	Organis.	Comment	Treatment of the comment
1	Ch 1.1	DEF	“Protecting and improving the waters and environment of the Danube River Basin is substantial for achieving sustainable development and is vital for the long term health, well-being and prosperity for the population of the Danube region. Being aware of this issue and due to the fact that the sustainable management of water resources requires transboundary cooperation, the countries sharing the Danube River Basin agreed to jointly work towards the achievement of this objective.” (page 1). This commitment is not only shared by the Danube countries and the EU but also by the Danube Environmental Forum.	Appreciated.
2	Ch 2.1.1 Ch 2.1.2 Ch 2.1.3	Stakeholder WS	Industry is a major polluter in many water bodies, ICPDR should take a lead in prioritization of actions to be addressed at international level.	Industrial pollution is assessed in several sub-chapters (2.1.1.2, 2.1.2.2, 2.1.3.1). Measures have been listed in the JPM (8.1.1.3, 8.1.2.3, 8.1.3.3).
3	Ch 2.1.1 Ch 8.1.1	Stakeholder WS	ICPDR should consider to stress the importance of the small wastewater treatment facility applications when basin wide strategy of waste water sector development is harmonised with national priorities.	A paragraph on small treatment facilities was added in chapter 8.1.1.3.
4	Ch 2.1.1 Ch 8.1.1	Stakeholder WS	More pressure should be put on national governments to tackle actions (legislation, financial support) on water sector (water supply, wastewater treatment).In the southern area of the Danube Basin more focus is needed on wastewater treatment.	Text on financial support and realistic planning was added in chapter 8.1.1.3, key conclusions were added on financial support (8.8)
5	Ch 2.1.1.1 Fig 9	GWP	“(Table 3 and Figure 9)” should be renumbered as (Table 3 and Figure 8)	Corrected.
6	Ch 2.1.1.1 Fig 8	GWP	“Figure 8” should be renumbered as Figure 7.	Corrected.
7	Ch 2.1.1.2	DANUBEPARKS	Considering the ecosystem services of intact floodplains and the loss of floodplain habitats in the past, the restoration of floodplains on agricultural land and to banish intensive agriculture from active floodplains should be stressed in the chapter 2.1.1.2 “Organic pollution from industry and agricultural point sources”.	Text was added on floodplain restoration in chapter 8.1.2.3.
8	Ch 2.1.1.3	GWP	It is stated in this chapter: “However, 34% of the agglomerations (representing 17% of the PE) have no collection systems which should be constructed together with appropriate treatment in the future.” GWP CEE prepared a guidebook on natural waste water treatment technologies and recommends to consider the treatment methodologies for small settlements as alternatives with lower investment, maintenance and operation cost solutions. The guidebook could be found at: <a href="http://www.gwp.org/Global/GWP-CEE_Files/Regional/Sustainable-sanitation-EN.pdf">http://www.gwp.org/Global/GWP-CEE_Files/Regional/Sustainable-sanitation-EN.pdf</a>	A paragraph on small treatment facilities was added in chapter 8.1.1.3.
9	Ch 2.1.2	GWP	It is stated in this chapter: “Surface waters can receive significant nutrient emissions from agricultural fields due to the high nutrient surpluses of the cultivated soils and/or inappropriate agricultural practices.” Nutrient surpluses of cultivated soils in most of the New EU MS and Non-EU countries are decreasing or constant and even in some regions the nutrient surpluses are negative. It would be good to show a graph on these trends by countries for the last 30 years. In the first table in Annex 11 the “Nutrient (N) surplus” column shows that only Slovenia reports slight increasing surplus, while for most of the countries the nutrient surplus stagnant or negative, and five countries did not provide information on this issue. It should be noted that nutrient surplus is not a measure of the amount of nutrient that could be subject of emission to water resources, rather it is a sort of measure to indicate the amount of nutrient in the root zone	Annex on agricultural trends is provided, surplus data will be shown in the Annex on MONERIS. In MONERIS, nutrient surplus is the nutrient amount that is NOT utilized by crops therefore it is subject to mobilization. All assessments refer to this definition of surplus.

			that the plant could utilize.	
10	Ch 2.1.2 Ch 8.1.2	<b>Stakeholder WS</b>	More attention should be paid in the plan to the possibilities of the new Common Agricultural Policy and its potential influence on the agriculture in the basin.	Text was added on CAP and agri-environmental measures in chapter 8.1.2.3.
11	Ch 2.1.2.1	<b>GWP</b>	In the DRBMP Update 2015 the reduction of organic and nutrient pollution of surface and groundwater is a significant water management issue. The construction of sewerage network and waste water treatment plants for large number of settlements with PE between 2000 and 10000 as well as providing solutions for settlements smaller than 2000 PE (people equivalents) would require unrealistically high costs from countries in the south and eastern part of the Danube Basin. To consider application of sustainable sanitation methodology with emphasis on using natural treatment technologies wherever these are feasible, thus reducing the very high economic burden on countries in the south and eastern part of the Danube Basin where there are still large number of small settlements without proper sanitation facilities.	Relation between impacts on SW and GW is mentioned in the plan. A paragraph on small treatment facilities was added in chapter 8.1.1.3.
12	Ch 2.1.2.3 Fig 17	<b>GWP</b>	In the left part of the figure there is no dimension given to the numbers at the top of the columns.	Dimension is written in the title.
13	Ch 2.1.2.4	<b>GWP</b>	In the last paragraph it is stated: "However, the reported industrial direct emissions rose by about 46% (TN) and 10% (TP) which is probably caused by the improved reporting quality."The industrial emission increase might come from increased industrial production in the region as well.	The text was rephrased.
14	Ch 2.1.3	<b>Stakeholder Workshop</b>	Pollution is more and more considered as a security problem in terms of accidental pollution.	Confirmed.
15	Ch 2.1.3.2	<b>GWP</b>	In the last paragraph it is written: "For the CS the M2 methodology has been applied for risk assessment." A reference paper would be needed here. It is not common to know M2 method.	Reference was added.
16	Ch 2.1.4	<b>GWP</b>	While there is a Summary of key findings chapter for three significant pressures (organic pollutions, nutrient pollutions and hazardous substances pollutions), such key findings chapter would be valuable and useful for hydromorphological alterations, as well.	The key findings were transferred from the respective sub-chapters on organic, nutrient and hazardous substances pollution into a box.
17	Ch 2.1.4	<b>WWF</b>	The significance of riverbed incision need to be emphasized properly in this chapter since it has broad consequences on the river ecosystem and a key factor to design future measures.	Added in chapter 2.1.4.1.
18	Ch 2.1.4 Ch 4.1.2.1 Ch 4.1.2.2 Ch 8.1.4.1. 1	<b>DANUBEPARKS</b>	Based on the results of the JDS 3, chapter 2.1.4 describes very well the quality of the Danube River in terms of river morphology. Considering the intention of the DRBMP to strengthen the coordination between the WFD and the Birds and Habitat Directive and facing the key role of biodiversity conservation in this context, DANUBEPARKS would like to stress the results of the JDS 3 on riparian bird species as indicators for rivers morphology which show a significant relationship between absence and presence of indicator species and the hydro-morphological class as the predictor: only river sections which are slightly modified (class 2) or even in a better ecological status show to full "biological potential" in terms of indicator species. Stronger hydro-morphological alterations reduce this ecological value, consequently, class 2 can be seen as a threshold for a good status in terms of biodiversity. This conclusion could be described in chapter 4.1.2.1 respectively in chapter 4.1.2.2 and should be considered in the vision and management objectives for hydromorphological alterations (8.1.4.1.1).	Information on linkage to indicator bird species added in chapter 2.1.4 under JDS3 results.
19	Ch 2.1.4 Ch 6.1	<b>Stakeholder WS</b>	Proposal to raise awareness also on negative impacts of flood protection measures and river training works;	Indicated in chapter 2.1.4, 6.1 and 8.1.4

	Ch 8.1.4			
20	Ch 2.1.4.1 Ch 8.1.4.1. 3.1	<b>EEA</b>	The downstream-migration at power plants is not solved at all.	This issues is already pointed out in chapter 8.1.4.1.3.1.
21	Ch 2.1.4.1 Fig 21	<b>GWP</b>	It is suggested to write: ..., posing problems i.e. for long and medium distance migratory fish species as well as for sediment transport.	Added in chapter 2.1.4
22	Ch 2.1.4.1 Ch 8.1.4.1	<b>DANUBEPARKS</b>	Due to the high relevance of river continuity for morphological processes and, furthermore, for the conservation of characteristic species of river habitats, the definition of the vision in chapter 8.1.4.1 "Interruption of river continuity and morphological alterations" should consider river dynamics as factor for biodiversity conservation. The strong impact of transversal structures on river morphology, downstream and upstream, should be highlighted. The crucial value of longitudinal and transversal river continuity should be highlighted, independently of fish and sturgeon migration which cover only one aspect of continuity.	Added in chapter 2.1.4.1.
23	Ch 2.1.4.1 Map 9	<b>Wasser-und Schiffahrtsverw altung des Bundes</b>	Map 9 cannot be read very well. In the federal waterway Danube are the following barrages, which are managed by WSV: Barrages Bad Abbach, Regensburg, Geisling, Straubing and Kachlet. In the boat alleys of the barrages Bad Abbach, Regensburg and Straubing are brush fishpass already been installed. The barrage Kchlet has a pool fish ladder. The effectiveness of the measures will be reviewed by monitoring. The barrage Geisling has no fish way.	The fish passes installed at the barrages/dams Bad Abbach, Regensburg, Straubing and Kachlet are not fully functional. Dams without passable fish passes are indicated with red dots in map 9. The barrage Straubing was marked green by mistake in the delivered data. This will be changed. Hence, all 5 dams are declared as not passable barriers.
24	Ch 2.1.4.2 Fig 23	<b>DANUBEPARKS</b>	Facing the high relevance of better connectivity for flood prevention and biodiversity conservation – in the Upper and in Middle Danube as well as in the Lower Danube – we see figure 23 "Area of DRBD wetlands which are reconnected or with reconnection potential" as misleading and, partly, counterproductive. Definitely, the graph is right to show the large areas with potential for reconnection at the Lower Danube. However, considering e.g. the growing importance of natural water retention measures as contribution to flood prevention, DANUBEPARKS experts identified also the potential and the need for large-scale reconnection measures at the Upper and the Middle Danube (possible also on areas > 500 ha). Innovative techniques (e.g. opening or relocation of flood prevent dykes) have to be considered to realize this potential also at the Upper Danube and Middle Danube. In this content, we refer to studies elaborated by the WWF (Assessment of the restoration potential along the Danube and main tributaries (2010, Schwarz); Assessment of the Restoration Potential in the Transboundary UNESCO Biosphere Reserve "Mura-Drava-Danube" (2012, Schwarz) and offer the expertise of the Danube Protected Areas to identify the restoration capacity in each Protected Area along the Danube. In figure 23 some coherence in the interpretation of "totally" or "partly" reconnected.	Figure 23 inter alia outlines areas which were already reconnected or which have the potential for re-connection as reported by the Danube countries. The reconnection potential depends on other uses like agriculture, urban development etc. and requires in many cases further assessments, which are under discussion to be performed in the frame of a potential future project.
25	Ch 2.1.4.2 Ch 6.1 Ch 8.1.4.2	<b>Stakeholder WS</b>	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;	Reconnection of wetlands/floodplains is a key issue under hydromorphology and synergies are pointed out under chapter 6.1. The "no net loss principle" is one of the management objectives. In addition the reconnection of formerly lost wetlands and floodplains is an additional measure as indicated in the DRBM Plan.

26	Ch 2.1.4.3 Fig 25 Map 13	<b>GWP</b>	<p>It is written in the text: "The pressure analysis concludes that in total 138 significant water abstractions are causing alterations in water flow in DRBD rivers (Figure 25 and Map 13). 87 water bodies are affected by these pressures. The Danube River itself is only impacted by alterations through water abstraction at Gabčíkovo hydropower dam (bypass channel) and water abstractions in Germany as well as Hungary." In Map 13 the DE Danube section is marked with blue line, no indication of any significant water abstraction, though text and Figure 25 refer to 5 significant water abstractions. Clarification is needed in the text why the DE Danube section is marked with blue. Clarification is also needed for the light green marked Hungarian Danube section. Why restoration measures are not necessary if there are still 3 significant water abstractions in this section.</p>	<p>Map 13 is updated on water abstractions in Germany according to the latest data provided. Restoration measures in Hungary were reported not to be necessary because the existing water abstractions are not considered as significant pressure type causing failure to achieve GES/GEP.</p>
27	Ch 2.1.4.4	<b>Stakeholder WS</b>	The list of Future Infrastructure Projects (FIPs) is proposed to be updated by the countries since not all relevant FIPs are considered to be yet included;	The list of FIPs was updated according to latest data provided by the Danube countries.
28	Ch 2.1.4.4 Map 15 A5	<b>Wasser-und Schiffahrtsverw altung des Bundes</b>	<p>Midyear 2014 the Federal government of Germany and the Free State of Bavaria have finally agreed upon the development of the Danube section from Straubing to Vilshofen based on an EU funded study. That means upgrading the waterway solely with stream control measures according the Variant A (without lock/dam) and improving the flood protection measures with regard to a 100 year event. The section from Straubing to Vilshofen is again divided into two subsections namely Straubing-Deggendorf and Deggendorf-Vilshofen. The planning contains engineering and accompanying landscape management measures. The latter are based on ecological obligations to compensate unavoidable impacts by the plan. Hence, motivation are the responsibilities under environmental law and not a river basin development in terms of WFD / Habitat and Bird Directive. EU funded study "Variant-independent investigation on the development of Danube waterway between Straubing and Vilshofen": The Danube river section from Straubing to Vilshofen is a major bottleneck in the TEN-T Network regarding loaded draught and nautical difficulties. After many years of interdisciplinary studies and political negotiations on the possibilities for improving shipping conditions including flood control and implementation of a regional planning procedure, there was no agreement about the variant to be used. Finally two remaining development variants with different benefit and impacts were pursued in the course of a EU fund and study as part of Priority Project 18. Based on this study both the Federal Government of Germany and the State of Bavaria decided variant A had to be chosen even though it does not guarantee equal conditions.</p>	For the two river water bodies DEBY_1_F361 and DEBY_1_F477 located in the Danube section from Straubing to Vilshofen future infrastructure projects navigation and flood protection will be included.
29	Ch 2.1.4.4 Map 15 A5	<b>WWF</b>	<p>In the annex, there are future infrastructure projects listed where neither EIA, nor SEA were elaborated and at the same time no deterioration is expected. We would like to ask for an explanation how "no deterioration" is justified if no environmental analysis was done. Also a question for the future how to select FIPs for the DRBM. If any independent body or institution should check/verify the justifications for the statements in the annex (e.g. no deterioration). We would also like to repeat our call for making art 4.7 studies available on the ICPDR intranet in order share information and procedures.</p>	The list of FIPs was updated according to latest data provided by the Danube countries.
30	Ch 2.1.4.4 Map 15 A5	<b>WWF</b>	This chapter mainly includes projects that are under implementation and less future ones. We have information about some planned dams which pose a significant risk of deterioration and transboundary effect is expected (like in Bratislava, Slovakia, in Slovenia on the Mura, or 3 dams on the Drava upstream Osijek), but they are not listed in the annex. What is the reason?	The list of FIPs was updated according to latest data provided by the Danube countries.
31	Ch 2.1.5	<b>EBU</b>	EBU welcomes that Hungary is elaborating a proposal to review its sediment management system in close cooperation with ICPDR, Austria and Romania. EBU offers all possible support for this improvement of the maintenance policy in the Hungarian stretch.	Appreciated.

32	Ch 2.1.5	<b>Stakeholder WS</b>	Using the water for heating and cooling will be more problematic area in the future.	To be taken into account for the future discussions on the update of the Significant Water Management Issues
33	Ch 2.1.5 Ch 8.1.4	<b>DANUBEPARKS</b>	<p>Considering the key importance of sediment management and riverbed incision as significant problem, a clear statement is missing in the DRBMP to tackle this issue: Specific actions are needed to balance the sediment regime in a) the last free flowing sections in the Upper Danube (in particular east of Vienna), b) downstream Gabčíkovo dam and c) downstream the Iron Gate dams. According to the different morphological situation and local frame conditions, detailed concepts have to be developed. However, the general perspective should be formulated in the management plan.</p> <p>Beside the focus on the crucial aspect of sediment quantity and transport in the main river channel, also the accumulation of fine sediments in the floodplains due to hydro-morphological alterations should be stressed in chapter 2.1.5. Active measures are necessary to counteract this factor for the increasing disconnectivity between river and wetlands.</p> <p>Restoration of hydro-morphological alterations gain higher priority, to be underlined in Joint Programme of Measures (JPM) for Hydromorphological alterations (chapter 8.1.4)</p>	<p>Sediment management is considered as a key topic for the ICPDR and a project proposal on this issue is under elaboration. Based on the results of the project, sediment management is planned to be addressed more strongly in the next DRBM Plan.</p> <p>Hydromorphological alterations already have high priority in the DRBM Plan since being defined as a "Significant Water Management Issue" including respective measures in chapter 8.</p>
34	Ch 2.1.5.1	<b>DANUBEPARKS</b>	Page 38, box Integrated River Engineering Project: the official English wording is Donau-Auen National Park (instead of National Park "Donau-Auen")	Text was updated accordingly.
35	Ch 2.1.5.1	<b>Stakeholder WS</b>	Pollutions originating from sediment should be considered in the plan.	Sediment quality issues are already addressed in chapter 2.1.5.1
36	Ch 2.1.5.1	<b>Stakeholder WS</b>	Sediment behind dams should be managed. Sediment should be returned from the reservoirs back to the nature. There should be a solution how to return deposited sediment to the river system.	Sediment management is considered as a key topic for the ICPDR and a project proposal on this issue is under elaboration. Based on the results of the project sediment management is planned to be addressed more strongly in the next DRBM Plan.
37	Ch 2.1.5.1	<b>Stakeholder WS</b>	Need for a sediment management tool	Sediment management is considered as a key topic for the ICPDR and a project proposal on this issue is under elaboration. Based on the results of the project sediment management is planned to be addressed more strongly in the next DRBM Plan.
38	Ch 2.1.5.1.	<b>WWF</b>	There are/were different industrial activities along the Danube and its tributaries, which deposited hazardous substances, sediments along the rivers, usually very close to the main course. The red sludge catastrophe on Torna creek and river Marcal in 2010 is an example that shows the volume of the risk of reservoirs, where polluted sediments are deposited. There are further red sludge deposits along the Danube, which can either cause accidental catastrophe or effect sediment and water quality. Reservoirs of metal mines on upper Tisza are also risks on the sub-basin. We suggest to refer to hazardous substances in this chapter as risk factors to the sediment quality.	Added.
39	Ch 2.1.5.1.	<b>WWF</b>	Concerning the sediment quantity the Danube is highlighted, but other rivers are not mentioned. We suggest at least to list other main rivers, where the lack of sediment is a significant problem and also the main root causes like dams, excavations, river regulation.	It is indicated in chapter 2.1.5.1 that the sediment transport in most large rivers within the DRB can be characterised as disturbed or severely altered and that attention should be given to ensuring the sediment continuum (improving existing barriers and avoiding additional interruptions).
40	Ch 2.1.5.2 Ch 6.4	<b>EAA</b>	<p>By our conception the comment of a joint statement by navigation and environment is to less. Please accept, the damages by navigation are clear. Black-Sea-Gobies are brought by the ballast-water of modern vessels and the waves. Black-Sea-Gobies are spread already over entire Europe, feeding on Spawn and fry of our fish, the tiny predators are hiding in the rip-rap-banks of our rivers. In these stretches of the Danube there are already up to 80 pieces/m<sup>2</sup> of these small pests.</p> <p>The waves by navigation are destroying spawn and fry on the few remaining nature-near zones. In the upper reaches of the Danube there are only a few of such zones left, in Austria for example the</p>	<p>The issue of IAS is addressed in chapter 2.1.5.2.</p> <p>The importance of the Joint Statement process towards sustainable navigation infrastructure is highlighted in chapter 6.4 and yearly Joint Statement Meetings are organised where the issues are addressed and discussed in more detail.</p>

			<p>“Wachau” and the “Nationalpark Donauauen”, all together about 24% of the Austrian Danube. So we think it’s necessary to state clearly, in such sensitive zones any waves by navigation have to be prohibited. River-navigation has to take care no more aquatic lifeforms can be brought in by ballast-tank-water, especially no Black-Sea-Gobies.</p> <p>Waves are causing damages on fish-spawn and fish-fry, therefore waves have to be prohibited in the few remaining sensitive zones of the Danube in the upper reaches in Germany and Austria.</p>	
41	Ch 2.3.1	<b>Province Lower Austria</b>	<p><b>SONDAR HU-AT:</b> Key aspect of the project: Soil as a filter for pollutants, soil as a reservoir for carbon</p> <p>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.</p> <p>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.</p>	It is not necessary to insert a specific statement about the link between soil management and groundwater in the chapter on groundwater because the references made in chapters on surface water are sufficient for this purpose.
42	Ch 3 Ch 6.3	<b>DANUBEPARKS</b>	The EU Strategy for the Danube Region has been launched as policy framework to ensure the equal representation and a balance of different sectors and Priority Areas in this macro-region. Anchor the approach of EUSDR PA 6 – e.g. biodiversity conservation, initiatives towards a Danube Habitat Corridor with strong Protected Areas as core areas – in the DRBMP update 2015.	The EU Habitats Directive 92/43/EEC, EU Birds Directive 79/409/EEC, EU Green Infrastructure Strategy and the EU 2020 Biodiversity Strategy are highlighted in chapter 6.3. Reference to the EUSDR is provided in chapter 6.6 and 8.5
43	Ch 3 Ch 6.3	<b>Joint Note NGOs (DEF, WWF, IAD, DANUBEPARKS, EAA)</b>	Cooperation of the ICPDR with EUSDR PA 4,5, and 6 presents a very welcome chance of strengthening the strategic approach to water related biodiversity conservation in the framework of water and flood risk management planning. We would welcome if ICPDR HoD used this opportunity more intensively for the development of a biodiversity conservation plan for the Danube corridor and relevant tributaries.	Noted.
44	Ch 3 Ch 6.3 Ch 8.1.4.1. 3	<b>DANUBEPARKS</b>	Stress the proactive role of Protected Areas in the Danube River Basin:- Protected Areas are active on many integration issues, in particular at the interface of river basin management and nature protection. Therefore, a link to chapter 6.3 should be included.- The Danube is the most international river of the world. Consequently, the harmonization of the Protected Areas’ management and transnational cooperation is strongly needed, to ensure coherence among all Protected Areas. This requirement should be stressed. In this content, the Danube River Network of Protected Areas could be mentioned as unique instrument to build a platform for the Protected Areas along the most international river and as good practice for other river systems, as stressed by winning the Natura 2000 Award 2015.- In point 4 of this statement, we propose to add (in chapter 8.1.4.1.3) the development of the Danube as habitat corridor as objective of the DRBMP, to counteract the “Interruption of river continuity and morphological alterations”. In this bio-corridor, Danube Protected Areas act as core areas, a role which should be stressed in chapter 3 of the DRBMP.	The role of the Danube Protected Areas was added in chapter 8.1.4.3.1.
45	Ch 3 Map 18	<b>DANUBEPARKS</b>	After a first look of Map 18, we would recommend a careful check whether all relevant Protected Areas are included (e.g. in Austria the Natura 2000 site “Tullner Auen” or the “Wachau” are not included).	The map was updated with latest data provided by the Danube countries.
46	Ch 4.1.1	<b>Stakeholder WS</b>	Improvement of monitoring network would be needed. Further improvement of devices and methods is also important.	Comment added to chapter 4
47	Ch 4.1.1	<b>Stakeholder WS</b>	Scientific further investigations/research are needed to understand the potential combined effects of specific pollutants below limit (EQS) values, which might be present in the water environment and producing interactions or integrated effects, which are not known yet.	There are many problems in coping with EQS, the suggested research is not relevant for this DRBMP
48	Ch 4.1.1	<b>Stakeholder WS</b>	The less developed countries in the basin need more effective support to revitalize their monitoring system to re-establish a baseline information system for better assessment and planning.	Comment added to chapter 4

49	Ch 4.1.4.2	<b>DEF</b>	The designation of HMWB needs to be reviewed for this plan. There are still water bodies not correctly designed as HMWB like in the Lower Danube or in the Save river. This should be changed in time because it is important to have the right environmental objectives.	The designation of HMWB is based on national methodologies and compiled in the plan. HMWB designation is an issue for the national level and the respective countries.
50	Ch 4.1.4.2	<b>DANUBEPARKS</b>	All Danube-wide monitoring schemes implemented by DANUBEPARKS underline the high ecological quality of the Lower Danube and its floodplains: The study on “Riparian bird species as indicator for River Dynamics and Morphology” – implemented in the frame of the Joint Danube Survey 3 – clearly shows the outstanding value of the Lower Danube. The definition of these sections and water bodies as heavily modified is in clear contradiction to scientific results. Additionally, these results also shows the extreme high ecological value of some sections at the Sava River, e.g. the highest abundance of Sand Martin - an indicator bird species for intact river morphology - of all rivers investigated in the Danube-river basin. Consequently, DANUBEPARKS sees a clear need to review the methodologies for water body designation: The categorization should not neglect scientific results of Danube-wide monitoring schemes implemented in the frame of the JDS and EU-funded programs, but has to reflect the outstanding ecological value of sections of the Lower Danube and the Sava River.	The designation of HMWB is based on national methodologies and compiled in the plan. HMWB designation is an issue for the national level and the respective countries.
51	Ch 4.1.4.2	<b>IAD</b>	A revision of this classification is recommended. 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.	The designation of HMWB is based on national methodologies and compiled in the plan. HMWB designation is an issue for the national level and the respective countries.
52	Ch 4.1.4.2	<b>Joint Note NGOs (DEF, WWF, IAD, DANUBEPARKS , EAA)</b>	In 2015, responsible countries will review the methodologies for water body designation, taking into consideration new data acquired as well as the EC standard methods.	The designation of HMWB is based on national methodologies and compiled in the plan. HMWB designation is an issue for the national level and the respective countries.
53	Ch 4.1.4.2	<b>WWF</b>	In case of several water bodies – like Drava upstream Barcs, free-flowing Sava, Lower Danube – the HMWB designation is questionable. The Joint Danube Survey 3 results give sufficient indications, for example, that the Lower Danube is not heavily modified. These sections are one of the best conditioned stretches in the region and comparing to other sections, we don’t see the proper justification of this decision even if in case of Drava hydropeaking or flood protection dykes along the Lower Danube are considered. The revision of these designations are recommended. In Croatia HMWB are still not defined, only candidates exist, because of lack of data that disabled final valorisation of water bodies.	The designation of HMWB is based on national methodologies and compiled in the plan. HMWB designation is an issue for the national level and the respective countries.
54	Ch 4.1.4.2 Map 19 Map 20	<b>WWF</b>	In the status assessment we saw inconsistent approaches between countries e.g. in case of Mura and Drava. The level of modification significantly change at the border while the natural conditions don’t underpin this. (AT-SI border it is significant: Mura is heavily modified in Austria, natural in Slovenia. The same situation exist on the Croatian-Hungarian border on river Drava, on the Romanian-Hungarian border on rivers Körös/Cricul and Berettyó/Barcau, and on the Hungarian –Slovakian border on river Bodrog.	The comment is not true for AT/SI, as there is a shared water body of AT-SI. Bodrog is natural in SK and HMWB in HU so the mentioned difference is OK in plan. HR/HU Drava is HMWB because of impact of hydropower, the water body between RO/HU is also HMWB.
55	Ch 4.1.4.2	<b>Stakeholder WS</b>	Further harmonising approaches on hydromorphology between countries (strengthening of methodologies for hydromorphological assessments and HMWB designation); this would lead to a more comprehensive and consistent DRBM Plan;	Added in chapter 8.8
56	Ch 5 Map 25	<b>DEF</b>	Map 25 is not really clearly showing the differences because colours are not so different for different issues.	All maps were checked again for readability
57	Ch 5.2	<b>DEF</b>	Exemptions according to articles 4.5 and 4.7 have to be explained	The description of the role of exemptions was extended. However, the application of exemptions is based on national approaches and decisions. Reference to more

				detailed information at national level (level B) is included.
58	Ch 5.2	<b>DEF</b>	The causes for less stringent environmental objectives (article 4.5) or for article 4.7 should be made visible and transparent. 40 waterbodies are concerned.	Reference to more detailed information at national level (level B) is included.
59	Ch 6.1	<b>Joint Note NGOs (DEF, WWF, IAD, DANUBEPARKS , EAA)</b>	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.	Coordination of concrete measures has to take place at national level (level B). However, the need for exchange between WFD and Flood Risk Management experts is pointed out, ongoing and will be further pursued in the frame of the ICPDR.
60	Ch 6.1	<b>Province Lower Austria</b>	<b>SONDAR SK-AT</b> 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.	Well noted.
61	Ch 6.1	<b>WWF</b>	In order to achieve the maximum synergies and reduce the potential conflicts, the following key conditions, activities are necessary: Developed measures under the WFD and FD processes have to be the result of a joint planning or at least iterative feedback loops between the planners of the RBMP and FRMP. Relevant water bodies have to be analysed in parallel from both directives point of view. Analysis should be done of different measure scenarios for the water bodies and the most effective ones chosen from the point of view of reaching environmental objectives, reducing flood risk and fulfilling cost-effectiveness. 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.	Coordination of concrete measures has to take place at national level (level B). However, the need for exchange between WFD and Flood Risk Management experts is pointed out, ongoing and will be further pursued in the frame of the ICPDR.
62	Ch 6.1	<b>WWF</b>	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 use change (e.g. change to wet meadows, grazing areas like grasslands, reed management, bee keeping)	Provision of proposal for checklist is appreciated and will feed into discussions on coordination requirements between WFD and FD.
63	Ch 6.1 Map 11	<b>IAD</b>	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. It is suggested to overlay the already compiled maps describing Flood hazardous and risk maps with RBMP	Proposal is appreciated. However, overlaying the wetlands map with the flood hazard map is currently of limited value because of the significant differences in size of the areas. Instead a link to the Danube Flood Risk Management Plan and related map was included in chapter 8.1.4.2.3 of the DRBM Plan.  Furthermore, concrete measures planning is a key issue for the national level (level

			<p>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.</p>	<p>B). Floodplain restoration and the implications for the WFD and FD requires in many cases further assessments, which are under discussion to be performed in the frame of a potential future project.</p>
64	Ch 6.1Map 11	WWF	<p>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 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.</p>	<p>Proposal is appreciated. However, overlaying the wetlands map with the flood hazard map is currently of limited value because of the significant differences in size of the areas. Instead a link to the Danube Flood Risk Management Plan and related map was included in chapter 8.1.4.2.3 of the DRBM Plan. Furthermore, concrete measures planning is a key issue for the national level (level B). Floodplain restoration and the implications for the WFD and FD requires in many cases further assessments, which are under discussion to be performed in the frame of a potential future project.</p>
65	Ch 6.2 etc	Umweltverbände Germany	<p>Specific suggestions on the inter-linkage between the WFD and Marine Strategy Framework Directive, including measures in the River Basin Management Plans for the benefit of the receiving sea. These are inter alia the following: Measures for the reduction of nutrient emissions like limitations for fertilizer application, periods of prohibition of application, economic instruments and subsidies, buffer strips along surface waters, storage capacities for manure, control mechanisms, application of fertilizers on slopes, organic farming, cultivation of energy crops, phosphor recycling, protection and maintenance of water-depend ecosystems, treatment of urban wastewater, monitoring, revision of limiting values for oily discharges, hydromorphological measures like the protection and restoration of river continuity and habitats, measures on hydropower or sediment management, beside others.</p>	<p>The link between WFD and MSFD is highlighted in chapter 6.2 which is dedicated to this issue.</p>

66	Ch 6.3	DEF	<p>In the public participation process on significant water management issues the Danube Environmental Forum (DEF) intended to add nature protection, biodiversity and green infrastructure to the significant water management issues. We keep on thinking that these issues are important in water management. Nevertheless we are pleased to see this issue now dealt with in the integration issues chapter as chapter "6.3 Interlinkage between river basin management and nature protection". Together with the prominent role of sturgeon protection in the management plan we are on a good way to integrate nature protection in the management plan. All these aspects can be developed in co-operation with the European Danube Regional Strategy EUSDR, especially Priority Area 6 Biodiversity) and with environmental NGOs, regional stakeholders including agriculture, who can contribute to develop the range of synergies of water and nature protection. Propose to add in chapter 6.3 (page 68) after the last but one paragraph:</p> <p>"The Danube river is the most important element of green-blue infrastructure and habitat connection in Europe and the DRB offers a large variety of biodiversity. River basin management can help to improve nature protection in and along rivers by avoiding further deterioration, restoring river and wetland dynamics and fostering adapted uses, especially land use. Strategic sustainable development and landscape planning in river corridors and space along rivers including flooded and dry areas are instruments to create manifold synergies for biodiversity, habitat connectivity, flooding and water protection, erosion control and climate change adaptation. Together with EUSDR Priority Area 6, environmental NGOs and other stakeholders including agriculture, ICPDR can provide core elements and a significant share of information and cooperation on green infrastructure, biodiversity and habitat connectivity in the DRB."</p>	<p>The linkage to Nature protection is considered as an important issue. Due to this reason, chapter 6.3 is specifically dedicated to this issue and e.g. the Green Infrastructure Strategy, ecosystem services, Biodiversity Strategy etc. are highlighted. The linkages to nature protection and related issues are furthermore highlighted in several chapters of the Plan.</p>
67	Ch 6.3	DANUBEPARKS	<p>The draft document stresses the need for coordination of the WFD with other Directives like Birds Directive and Habitats Directive (page 66). The high relevance of biodiversity conservation is underlined in the Danube River Basin Management Plan (e.g. chapter 6.3). Both aspects are highly supported by DANUBEPARKS.</p>	<p>Appreciated.</p>
68	Ch 6.3	IAD	<p>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.</p>	<p>Well noted.</p>
69	Ch 6.4	EBU	<p>The integration of the Danube river basin and the core inland ports as multimodal nodes in the TEN corridors need to be taken into account both in the interaction of environmental protection with navigation and in the field of economic development and sustainability in the DRB waterbodies.</p>	<p>These issues are particularly addressed in the frame of the Joint Statement process. In the Plan chapter 6.4 is dedicated to this issue.</p>
70	Ch 6.4	GWP	<p>Acronym IWT is not referenced in the List of Acronyms</p>	<p>Added.</p>
71	Ch 6.5	DEF	<p>Regarding a situation when most of the problems with existing hydropower are not even mitigated and upstream fish migration is not improved in many cases, some financial and political interests of the energy and building sector and some people in favour of renewable energy (often without knowledge on ecological impacts) are fostering a new wave of new dam building in the DRB. An implementation of these plans would cause massive further deterioration of rivers and streams. This is not in line with WFD objectives and there are definitely significantly better environmental options and alternatives.</p>	<p>The need for mitigation measures and strategic planning on hydropower is pointed out in the DRBM Plan and further specified in the ICPDR "Guiding Principles on Sustainable Hydropower Development in the Danube Basin" which are referenced in the plan and highlighted in chapter 6.5.</p>
72	Ch 6.5	DANUBEPARKS	<p>The draft version illustrates very well the disturbed and altered situation of sediment quantity at most large rivers within the Danube River Basin and stresses the need for actions by an integrated approach with hydropower and other sectors. In chapter 6.5 Sustainable hydropower it should be highlighted that sedimentation and transport of sediments play a key role when it comes to the sustainability of hydropower.</p>	<p>The role of hydropower regarding sediment quantity is already pointed out in chapter "2.1.5.1 Quality and quantity aspects of sediments". Specifically outlining sediments in chapter 6.5 would also require outlining all other pressures related to hydropower, what would be a duplication of information already provided in chapter 2. Therefore chapter 6.5 is more focusing on strategic aspects.</p>

73	Ch 6.5 etc	<b>DEF</b>	The danger of a massive deterioration of rivers in the DRB by a wave new hydropower projects has to be discussed clearly in this management plan basically aiming at river protection. Otherwise the objectives of the WFD are not met on this important issue. The chapter on hydropower and the guidelines should be revised from the perspective of river protection and the objectives of reaching good status and avoiding deterioration. In addition to the chapters 6 and 8. Also for chapters 5, 6 and 8, especially 5.1, 6.1, 6.4, 6.5 and 8.1 the issue of strategic planning for river restoration including the impacts of uses could be sharpened.	It is pointed out in the DRBM Plan that the need to increase production of renewable energy represents a significant driver for the development of hydropower generation. Balanced approaches are needed, requiring further exchange between water and energy managers what is planned to further take place in the frame of the ICPDR.
74	Ch 6.6	<b>IAD</b>	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.	The sturgeon issue is addressed in the plan as well as by the DSTF. Sturgeons are also addressed in the frame of the Joint Statement process and relevant projects.
75	Ch 6.6	<b>WWF</b>	Additionally to the already mentioned problems and measures, we recommend add the need for more effective enforcement of sturgeon conservation legislation and in order to reduce incentives for poaching, to involve relevant actors in developing alternative income for fishermen.	The problem of poaching is mentioned in chapter 6.6 and addressed in the frame of the DSTF.
76	Ch 6.6	<b>WWF</b>	In connection with navigation improvement, measures or requirements to protect Sturgeon habitats are also suggested.	Measures required for sturgeon protection are outlined in chapter 6.6 and further specified in Sturgeon 2020.
77	Ch 6.6	<b>WWF</b>	We recommend to properly highlight in the chapter the strong need for enhanced research and monitoring of Sturgeon status and distributions as well as key habitats as key prerequisites of any future measures for Sturgeon conservation.	Chapter 6.6 outlines urgent priority actions, including inter alia monitoring and the mapping of existing and historic sturgeon habitats in the DRB.
78	Ch 6.7	<b>GWP</b>	To consider water scarcity and drought impacts and adaptation measures as significant issues on basin wide level in the Danube River Basin Management Plan Update 2015.	Water scarcity and drought is considered as a Significant Water Management Issue in some countries but not yet on the basin-wide scale. However, the issue is addressed in chapter 6.7.
79	Ch 6.7	<b>Stakeholder WS</b>	Water scarcity and water quality should be addressed in an integrated way as they are interconnected.	Both issues are addressed in the integrated DRBM Plan.
80	Ch 6.7	<b>Stakeholder WS</b>	The fact that water scarcity and drought is addressed was appreciated, however, the lack of sufficient policies and guidelines was raised, causing a challenge for practical measures implementation	The need to maintaining an exchange on water scarcity and drought is mentioned in chapter 6.7. Furthermore, activities of GWP and DMCSEE are highlighted, next to the mission to coordinate and facilitate the development, assessment, and application of drought risk management tools and policies in South-Eastern Europe with the goal of improving drought preparedness and reducing drought impacts.
81	Ch 6.7	<b>Stakeholder WS</b>	Proposal to work more on water scarcity and drought, i.e. towards practical implementation of measures;	
82	Ch 6.7	<b>WWF</b>	We suggest to include in the chapter the reference to river regulations in the 20th century, which cut many oxbows, side-arms and floodplains from the rivers. The water retention capacity of rivers and adjacent habitats significantly reduced, which can become a factor of water scarcity.	Several factors are relevant for water scarcity and droughts. The issue of cut-off side arms and floodplains is addressed in the chapters on hydromorphology.
83	Ch 6.7	<b>Drought Management Center for SEE</b>	DMCSEE would encourage to establish coherent framework for drought management in DRB. At the moment many activities in the frame of DMCSEE was devoted to agricultural drought management but hydrological drought is still not explored to the stage that countries would have drought proactive plans. For countries in DRB, especially in the south, would be pragmatic to have framework in place in advance to manage drought risks through an integrated approach when needed. Experiences, good practices and review of national action plans in central and eastern Europe from GWP/DMCSEE projects related to drought could be also used for filling knowledge gaps in adaptation to climate change/more frequent risk of hydrological drought in DMP. DMCSEE appeal is to encourage inception of follow-up project on existing knowledge which could help to make a shift from reactive to proactive drought measures, the integration of vertical planning and decision-making processes and capacity building for all stakeholders in DRB.	The need to maintaining an exchange on water scarcity and drought is mentioned in chapter 6.7. Furthermore, activities of GWP and DMCSEE are highlighted, next to the mission to coordinate and facilitate the development, assessment, and application of drought risk management tools and policies in South-Eastern Europe with the goal of improving drought preparedness and reducing drought impacts.

84	Ch 6.8 Ch 8.1.4.4	<b>Stakeholder WS</b>	Working towards better planning is considered as an important issues, taking into account long-term perspectives and effects (e.g. climate change), transparency, a broader planning perspective on benefits and impacts, as well as public consultation and the involvement of stakeholders;	Well noted. The ICPDR is working to reach this objective.
85	Ch 7	<b>DEF</b>	The economic analysis is an important element of the management plan. Water is important as drinking water and for many uses. The polluter pays principle should be a basic principle for all water uses. This principle often has not been applied but it would help to solve problems and to avoid deterioration. Yet there are still a lot of differences on the definition of water services. Whatever the definitions it is important to have information on the environmental and resource costs of all uses. It is necessary to clear this problem soon. DEF advocates clearly the broader definition with the EU Commission. Otherwise the polluter pays principle would not work in many cases and water bodies are not improved because of restricted financial capacities.	An addition was included to highlight the importance of CR for the polluter pays principle in chapter 7.3
86	Ch 7	<b>Stakeholder WS</b>	Concept of ecosystem services should be considered and should be integrated into the plan at basin level.	The concept of ecosystem services is interesting and potentially relevant for several WFD implementation steps; it is not, however, an explicit part of the Directive and its practical implementation faces significant difficulties, and hence it is not included at the basin level.
87	Ch 7.2 Tab 22	<b>GWP</b>	The only country which reported that population connected to public sewerage system is less (74%) than population connected to wastewater treatment plant (99%). Clarification would be needed to explain how this could be.	The chapter was updated and more detailed information can be obtained from table 23 and 24.
88	Ch 8.1.2	<b>Province Lower Austria</b>	<b>Pilot project „Management of soil organic matter and regional production of biofertilizers“</b> 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.	Well noted.
89	Ch 8.1.2	<b>Stakeholder WS</b>	Designated land is needed for nature conservation restoration purposes in active flood plains for nutrient pollution reduction.	Text was added on flood plains in terms of nutrient retention.
90	Ch 8.1.2	<b>Stakeholder WS</b>	Better methods of the organic and inorganic fertilizers usage/application on land are needed.	Text was added on balanced fertilization.
91	Ch 8.1.2	<b>Stakeholder WS</b>	A regional/basin wide level organic material balance and management system for reduction of nutrient pollution is proposed.	Text was added on maintenance of soil organic material content.
92	Ch 8.1.2	<b>Stakeholder WS</b>	To achieve higher pollution reduction the respective subsidies should be more properly used focusing on better adaptation of land use. Better financial instruments are also needed.	Text was added on better financing agricultural measures.
93	Ch 8.1.2	<b>Stakeholder WS</b>	When reducing nutrients in the rivers this might result in reduction of the biomass (fish population) as well. More understanding is needed on the balance of the both sides of the issue.	Not relevant for PM EG.
94	Ch 8.1.2	<b>Stakeholder WS</b>	It is proposed to pay attention to different investment projects, not only focusing on wastewater treatment on big cities, but on smaller settlements (with less than 2000 PE) as well. This would decrease pollution loads of the groundwater.	Relation between impacts on SW and GW is mentioned in the plan. A paragraph on small treatment facilities was added in chapter 8.1.1.3.
95	Ch 8.1.2	<b>Stakeholder WS</b>	Phosphorous in middle term perspective would be looked at as resource, therefore P losses should be minimized.	Text was added on P loss minimization.
96	Ch 8.1.2	<b>Stakeholder WS</b>	The timing and dosage of nutrients (organic, inorganic) applications should be compliant with the existing legislation in the practice.	Text was added on Nitrate Directive and restricted fertilization.
97	Ch 8.1.2	<b>Stakeholder WS</b>	Agricultural practice should be appropriately managed to minimize nutrient loads to the surface and groundwater resources, this should get priority in the measures.	Text was added on agricultural measures to prevent nutrient losses.

98	Ch 8.1.2	<b>Stakeholder WS</b>	Water corridors are good practical means to reduce pollutants transfer from catchment areas. At least 5 m or 15 m buffer zones should be created to reduce pollution from agricultural fields to the surface waters.	Text was added on buffer zones.
99	Ch 8.1.2	<b>Stakeholder WS</b>	High technology (state of the art) farming practices which could reduce pollution load from agriculture should be supported.	Text was added on best management practices.
100	Ch 8.1.2	<b>Stakeholder WS</b>	More detailed knowledge would be needed on over nutrition of agricultural plants. Allocation of more resources for the solution of this problem is advised. Introduction of Best Practices in the daily farming activity would be needed.	Text was added on balanced fertilization and best management practices.
101	Ch 8.1.2	<b>Stakeholder WS</b>	Support of clean agriculture is recommended by increasing or better utilizing the subsidies for clean agricultural production.	Better allocation of funds for agri-environmental measures is discussed in the plan.
102	Ch 8.1.2	<b>Stakeholder WS</b>	Cost-effectiveness and farmers' willingness to implement agricultural measures are very relevant issues. Dialogue with agricultural sector is a must. Targeting the hot spots and proper subsidization of the measures are essential.	Targeting, proper subsidization and dialogue with farmers is discussed in the plan.
103	Ch 8.1.2	<b>Stakeholder WS</b>	Concentration of land ownership/production should not be further encouraged, however, it is recommended to get around 10% of the population to be involved in the agricultural production sector for effective implementation of measures.	Well noted.
104	Ch 8.1.2	<b>Stakeholder WS</b>	Farmers need money to implement the environmental oriented measures in connection with agricultural production.	Financial support is discussed in the plan.
105	Ch 8.1.2	<b>Stakeholder WS</b>	Trace back the sources' approach should be encouraged for the agricultural sector (and maybe linked that with polluter pay principle).	Well noted, it belongs to lower level planning.
106	Ch 8.1.2	<b>Stakeholder WS</b>	Proposal to work closer with the agricultural sector - several issues considered as relevant (reduction of nutrient and hazardous substances pollution, use of agricultural land for water retention, soils – role as linkage between agriculture and water, erosion and relevance for sediment transport, etc.);	Future task, mentioned in the plan.
107	Ch 8.1.2	<b>WWF</b>	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 are key prerequisites for either nutrient reduction or floodplain restoration.	Better allocation of funds for agri-environmental measures is discussed in the plan.
108	Ch 8.1.3	<b>Stakeholder WS</b>	There are many inventories on hazardous substances, but these are separated. There is a need to develop a detailed integrated inventory, which could increase the information base about the real situation of hazardous substances in the production sector/economy.	Future task, work is on-going. A short paragraph was added on the basin-wide catalogue of risk spots
109	Ch 8.1.3	<b>Stakeholder WS</b>	Higher level (fourth type) treatment would be needed to reduce impacts of hazardous substances. It is recommended to consider examples from Switzerland where 100 waste water treatment plants will be upgraded aiming the fourth technology (ozonation, UV treatment, activated carbon filters)	Sentence was added on the fourth stage.
110	Ch 8.1.3	<b>Stakeholder WS</b>	Radioactive substances are considered as a serious issue in the Sava basin. There is no proper solution of dumping radioactive wastes in environmentally sound way in the basin. There is no information about radioactive wastes in the plan.	Radioactive substances are not evaluated for the status assessment and are not considered explicitly by the Water Framework Directive.
111	Ch 8.1.4	<b>Stakeholder WS</b>	Progress and best practices in hydromorphological measures implementation are proposed to be better communicated	The DRBM Plan was revised for better communicating the progress which was achieved.
112	Ch 8.1.4	<b>Stakeholder WS</b>	River continuity is proposed to be broader addressed, including next to fish migration also other aspects of connectivity, i.e. disconnection of semi-aquatic habitats, sediment transport, reduced river dynamics and impacts on related species, next to the issue of downstream fish migration;	Added in chapter 2.1.4; the issue of downstream migration is already pointed out in chapter 8.1.4.1.3.1
113	Ch 8.1.4	<b>Stakeholder WS</b>	Proposal for guidance on the application of exemptions for new projects according to WFD Art. 4.7, taking into account work already performed in the frame of the Joint Statement on Inland Navigation and the Environment, Guiding Principles Sustainable Hydropower and on Sustainable Flood Risk Management;	The importance of WFD Art. 4(7) is already pointed out in chapter 8.1.4.4 and respective steps for ensuring the further exchange for ensuring the sustainability of future infrastructure projects.

114	Ch 8.1.4	<b>Stakeholder WS (DEF)</b>	Danube Environmental Forum is missing river corridor concept that could be upscale into an international pilot project. It proposed to have a close look on deterioration issue due to hydro-power construction. Integrated planning should integrate land-use not around rivers but in broader areas. We also have to keep in mind an overall goal of achieving a good water status.	An international project addressing the river corridor concept was already performed with the SEE River Project. Integrating land use not only around rivers but in a broader sense (i.e. addressing diffuse pollution) is addressed in particular by river basin management planning, the subject of the DRBM Plan, including the objective of achieving "good status".
115	Ch 8.1.4.1	<b>WWF</b>	Improving monitoring of fish pass functioning and effectiveness is crucial. We recognized an inconsistent approach to restoring river continuity. While some countries like Romania assume that GES is already reached or apply art 4.5 for most dams, meantime other countries assume that much more restoration is possible / needs to be done. We suggest as potential measure for the next period to harmonise the approaches of the countries.	Monitoring fish pass functioning was added in chapter 8.1.4.1. Decisions on measures are subject for the national level.
116	Ch 8.1.4.1 Map 32	<b>Wasser-und Schifffahrtsverwaltung des Bundes</b>	According to current planning status is intended to restore the continuity of the barrages Geilsing, Kachlet and Straubing in management period by 2021 by further measures. The continuity of barrages Regensburg and Bad Abbach will be restored by 2027.	The data concerning the 5 dams/barrages will be corrected according to the comment of the WSV.
117	Ch 8.1.4.1.	<b>DANUBEPARKS</b>	Influence of barriers and interruption often cannot be compensated for the full quantity of fish, not for all species, and often downstream migration is still limited. These aspects should be mentioned in the DRBMP to avoid the misleading picture of full compensation of barriers by fish ladders. A careful evaluation and further studies on infrastructure to overcome alterations of river continuity for fish migration is needed.	It is mentioned in the DRBM Plan that "the restoration of downstream connectivity is still less advanced than it is for upstream fish passage." Further progress on the effectiveness of fish migration aids is expected to be made with the ongoing implementation of measures.
118	Ch 8.1.4.1.3	<b>DANUBEPARKS</b>	The vision and management objective of the updated DRBMP definitely should stress the high relevance of the Danube River as habitat corridor of European relevance, not only in aquatic habitats (fish, sturgeons), but also in semi-aquatic and terrestrial habitats and as flyway for water-related organisms. According to the priorities defined in the Action Plan for the EU Strategy for the Danube Region and the draft operational program of the upcoming Danube Transnational Cooperation Program, DANUBEPARKS propose to include in chapter 8.1.4.1.3 the clear objective to develop the Danube as habitat corridor.	The importance of the Danube as an important habitat corridor connecting Protected Areas was added in chapter 8.1.4.1.3.1
119	Ch 8.1.4.2	<b>WWF</b>	We support the prioritization of the potential sites to be restored and also the approach to choose sites as first priority which have multiple benefits (like biodiversity improvement, flood mitigation, nutrient reduction, drought/water scarcity mitigation, climate change adaptation, etc.). Desired actions and results need to be integrated into other relevant plans (e.g. Flood Risk or Natura2000 management plans).	Well noted.
120	Ch 8.1.4.2 Map 11	<b>WWF</b>	Compared to the first plan, the wetland reconnection potential is drastically reduced in the 2nd draft DRBMP in the Lower Danube, Prut and Upper Tisza and would like to ask what is the reason for this lower level of ambition.	Updated information on the restoration potentials was provided by Danube countries.
121	Ch 8.1.4.2 Map 11	<b>WWF</b>	WWF provided two restoration potential analyses and here would like to offer them again for further use. We would appreciate a lot if the DRBMP could mention them as potential recommended resource documents: 1.) Assessment of the Restoration Potential in the Transboundary UNESCO, Biosphere Reserve "Mura-Drava-Danube" ; Vienna, October 2012; Ulrich Schwarz, FLUVIUS (commissioned by WWF) 2.) Assessment of the restoration potential along the Danube and main tributaries; Vienna, July 2010; Ulrich Schwarz, FLUVIUS (commissioned by WWF)	The potentials for floodplain restoration and the implications for the WFD and FD requires in many cases further assessments, which are under discussion to be performed in the frame of a potential future project. Already existing studies should be useful for this work. A reference was therefore included in chapter 8.1.4.2
122	Ch 8.1.4.2 Maps	<b>WWF</b>	We would like to highlight again also under the wetland restoration chapter that improvement of intersectorial working relationship with 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 are key prerequisites for either floodplain restoration or nutrient reduction.	Intensified exchange with the agricultural sector is planned as a future activity and outlined in chapter 8.1.2.

123	Ch 8.1.4.2. 1	<b>DANUBEPARKS</b>	<p>Due to hydro-morphological alterations, nearly all (most valuable) natural sites and Protected Areas are facing damaged, insufficient and bad connectivity between river and floodplains (should be added in chapter 8.1.4.2.1):</p> <ul style="list-style-type: none"> <li>- Improvement of connectivity between rivers and their wetlands/floodplains which are caused by alteration of river morphology (caused by bed and bank reinforcement for erosion control, the straightening and deepening of the river channel or by river substrate manipulation)</li> <li>- Specification of number, location and area of wetlands/floodplains that connection will be improved by 2021 by each country.</li> <li>- Ensuring exchange with relevant experts on the implications of the measures for sustainable flood risk management.</li> </ul>	In chapter 2.1.4.2 it is already pointed out that "compared with the 19th Century, less than 19% of the former floodplain area (...) remain in the entire DRB (...) caused in particular due to the expansion of agricultural uses and the disconnection from water bodies due to river engineering works concerning mainly flood control, navigation and hydropower generation. Furthermore, the protection, conservation and restoration of wetlands/floodplains is inter alia already included as a management objective in chapter 8.1.4.2.1.
124	Ch 8.1.4.2. 1	<b>DANUBEPARKS</b>	<p>DANUBEPARKS highly welcomes all steps to reach the vision to reconnect and restore Danube floodplains and wetlands (chapter 8.1.4.2.1). Facing the loss of floodplains in the Danube River Basin in the past and considering the unfavourable condition of numerous wetlands, the no net-loss principle can be seen only as first step, but a pro-active approach towards restoration has to be stressed.</p> <p>In this context, DANUBEPARKS would see the need to have a stronger focus of ICPDR activities (e.g. within the next Joint Danube Survey JDS4) on the conditions of floodplains, not exclusively on the river itself.</p>	A pro-active approach towards the restoration of wetlands is clearly expressed in the DRBM Plan, in addition to the no net-loss principles. The scope of JDS4 will be discussed during the preparation of JDS4.
125	Ch 8.1.4.2. 3 Tab 35	<b>GWP</b>	<p>Dimension is missing.</p> <p>An identical table is presented in the Flood Risk Management Plan for the Danube River Basin District on page 55 (Table 1), but the numbers do not match. Harmonisation of the two tables and the corresponding texts is needed.</p>	Dimension was added and figures with those presented in the Flood Risk Management Plan harmonised (updated in both Plans).
126	Ch 8.1.4.2. 4 Tab 36	<b>GWP</b>	Numbers in the text and Table 36 (construction on-going and completed) do not match.	Text was updated accordingly.
127	Ch 8.1.4.3	<b>WWF</b>	Hydropeaking: In case of several rivers downstream of the dams there is no or very limited information about the water discharge parameters to be released. Measures to improve the monitoring and real time data from the flows to downstream would considerably supplement measures targeting ecological status improvement and flood protection, and measures that should mitigate and buffer hydropeaking, like implementation of e-flow, based on holistic e-flow assessment.	The importance of monitoring in combination with measures implementation and further research is pointed out in chapter 8.1.4.3.4.
128	Ch 8.1.4.3	<b>WWF</b>	The chapter doesn't show the link with riverbed incision and sediment balance. Not only hydropeaking, but "regular operations of hydropower plants cause water level fluctuations, which can cause considerable pressures on freshwater habitats. Dams are sediment traps and enhance riverbed incision downstream effecting biodiversity, agriculture, forestry, and water supply. We suggest to add this link to the text.	Text in chapter 2.1.4.1 on pressures was updated.
129	Ch 2.1.4.3. Figure 26	<b>DANUBEPARKS</b>	To have a good starting point for the documentation of the current situation and expected improvements by 2021 (chapter JPM 8.1.4.3.3) a careful description of the present situation is necessary: For Germany, graph 28 shows an "unspecified magnitude", but data are available and should be included (e.g. five hydropower plants between Bertoldsheim to Vohburg operate with a magnitude of 1.5 m twice a day).	The data that is the basis for Fig. 26 contains hydropeaking at River Water Body-level, not at the level of individual continuity interruptions. Therefore, it is not possible to determine a single value for the magnitude unless all interruptions in one river water body fall into the same category. This would have to be proven.
130	Ch 8.1.4.4	<b>Stakeholder WS</b>	Proposal for discussion on the practical application of the Hydropower Guiding Principles, i.a. regarding obstacles and solutions; potential for multi-purpose uses and enabler for other forms of renewable energy by balancing supply and demand, the already utilised potential and the need for a balanced approach and environmental impacts should be taken into account.	Intention to further facilitate exchange on hydropower is clearly expressed in chapter 8.1.4.4

131	Ch 8.1.4.4	WWF	The Guiding Principles on Sustainable Hydropower Development in the Danube Basin was adopted in 2013 June. In the last two years little progress is detected in the implementation including especially defining, designating and mapping exclusion zones for new hydropower, according to scientifically sound ecological, cultural and social criteria. (See former NGO HP position paper as reference.) We recommend to agree on joint actions to define obstacles, difficulties of implementation (considering all relevant stakeholders and authorities) and define the proper tools how to target them.	Intention to further facilitate exchange on hydropower is clearly expressed in chapter 8.1.4.4
132	Ch 8.1.4.4	WWF	We strongly support stakeholder involvement during the pre-planning of projects. Additionally we suggest to add that also concrete planning phases should be observed by stakeholders, establishment of stakeholder fora to all infrastructure projects that fall under the ICPDR definition for FIP would be necessary. (This platform would have a kind of supervisory role with permanent members of different stakeholder groups. The costs of this forum should be covered by project budgets. This model worked well during the planning phase of e.g. the navigation route development project on the Serbian Danube.)	The planning and implementation of infrastructure projects is within the responsibility of national authorities. However, ensuring exchange where needed and considered as useful is taking place in the frame of the ICPDR (e.g. on inland navigation), taking into account practical limitations due to resource constraints.
133	Ch 8.1.4.4	WWF	There is unclarity about what an art. 4.7 analysis should entail. We recommend to develop a more detailed 4.7 guidance document for future infrastructure projects.	The application of exemptions according to WFD Art. 4.7 is within the responsibility of national authorities. However, exchange of experiences is (e.g. Guiding Principles Sustainable Hydropower, Joint Statement Inland Navigation) and planned to be further pursued in the future.
134	Ch 8.1.4.4 Ch 9	Stakeholder WS	Approaches for public consultation and stakeholder involvement should be strengthened towards better planning - proposal for support and exchange of experiences in the frame of the ICPDR;	The ongoing public participation work of the ICPDR is described in Chapter 9 of the DRBM Plan Update 2015. Information sharing and capacity building is a key aspect of the expert group structure of the ICPDR. The comment does not require an integration into DRBM Plan Update 2015.
135	Ch 8.1.4.4 Ch 9	Stakeholder WS	Suggestions to further work on improved cooperation with relevant sectors - WFD and Flood Risk Management, Joint Statement Inland Navigation and Environment, Guiding Principles Sustainable Hydropower;	Integration issues are understood to be a key aspect of both the technical and the public consultation work presented in the DRBM Plan Update 2015. In particular, this is reflected in Chapter 6 (Integration Issues) and the reference to stakeholder dialogues as outlined in Chapter 9 (Public Consultation). Cooperation with relevant sectors - as described in the plan - will remain high on the agenda of the ICPDR during the coming implementation cycle. The comment does not require an integration into DRBM Plan Update 2015.
136	Ch 8.5	GWP	In the last paragraph acronym ESIF is not referenced in the List of Acronyms.	Added
137	Ch 8.5	Stakeholder WS	Support/help national actors with applying for available funds (listed in Annex 18 and others). Several difficulties were mentioned at the workshop: administrative complexity for applying and managing funds; co-financing requirements; timing of financing and planning process were not in line, etc.	Shortcomings mentioned in the stakeholder workshops were added in chapter 8.5 as a footnote; recommendations for future improvements will be considered in the future work of the ICPDR.
138	Ch 8.5	Stakeholder WS	Better utilize local knowledge and experience and include local actors into prioritization process (usually they are excluded from the debate).	
139	Ch 8.5	Stakeholder WS	Better understanding of financial flows: incentives for sustainable water use, economic instruments, and sustainability of investments that has worked in the past and can be improved in the future, cost-effectiveness of measures.	
140	Ch 8.5	Stakeholder WS	More support from the Danube level for prioritization of the measures on a national level.	
141	Ch 8.5	Stakeholder WS	Make a connection with EU Strategy for the Danube Region (EUSDR) and Danube Transnational Programme.	A paragraph regarding the Danube Transnational Program was added in chapter 8.5.

142	Ch 8.5	<b>Stakeholder WS</b>	<p>Recommendations for future years: There should be exchanges of experiences at the basin-wide level on following:</p> <ul style="list-style-type: none"> <li>o regarding interaction with different administrative levels for the measures implementation (better communication with higher level);</li> <li>o better understanding (based on the 1st RBMP experiences) of »financing that worked«; how were successful projects implemented, what were benefits, where did they get funding, etc.</li> <li>o case studies of using funding possibilities;</li> <li>o better understanding of cost-effectiveness of measures (examples based on the 1st RBMP experiences);</li> <li>o how to involve private sector financing;</li> <li>o examples of win-win situations (flood protection, energy, biodiversity, etc.).</li> </ul>	Recommendations for future exchanges of experience will be considered in the future work program of the ICPDR.
143	Ch 8.5	<b>Stakeholder WS</b>	Transparency of the funding/spending should be improved. A better understanding is needed regarding what was the benefit/„profit“ of the money which was already invested in the measures in the past, how have investments in the past been done, what were the financial flows, etc.	Shortcomings mentioned in the stakeholder workshops were added into the chapter 8.5 as a footnote. Recommendations for future improvements will be considered in the future work program of the ICPDR.
144	Ch 8.5	<b>Stakeholder WS</b>	<p>Various financing mechanisms exist; however, fundraising requires capacity, skills, resources for co-funding, etc. There should be bigger support/help from the basin-wide level to national-actors get access to funds. So called “Funding Help Desk” was proposed:</p> <ul style="list-style-type: none"> <li>o supporting search for funding possibilities (e.g. list of calls);</li> <li>o supporting funding applications (at various levels – focus on local);</li> <li>o getting national co-financing;</li> <li>o communication with different levels (authorities) and sectors; interaction between different levels of authorities and different sectors is usually not working);</li> <li>o supporting public participation;</li> <li>o to create basin wide small fund for small projects that integrate public active players – small NGOs, municipalities, SMEs, etc.</li> </ul>	
145	Ch 8.5	<b>Stakeholder WS</b>	<p>Clearer guidance to prioritization of measures needed to improve chances of national actors to gain funding:</p> <ul style="list-style-type: none"> <li>o to break down „big steps“ in the plans into smaller, concrete ones as recommendations on concrete actions for countries;</li> <li>o to identify priority areas for investments regarding problems which have transboundary effects. To identify „hot spots“, where finances should be channelled to (priorities connected for examples with country’s natural hazards, etc.)</li> </ul>	
146	Ch 8.5	<b>Stakeholder WS</b>	Concrete pledges/commitments of countries for each SWMI could be added to the plan.	To indicate concrete commitments for funding on each SWMI for each country would be extremely difficult due to the complex and varying funding structure in each country.
147	Ch 8.5	<b>Stakeholder WS</b>	Better utilization of the Common Agricultural Policy 2nd pillar for water management measures is crucial. To finance those measures which address sustainable land use.	The 2nd pillar of the CAP is important and needs to be considered at the national level.
148	Ch 8.5	<b>Stakeholder WS</b>	Creation of win-win solutions with broad stakeholder support.	Win-win solutions are a key driving force behind the work of the ICPDR.
149	Ch 8.5	<b>WWF</b>	<p>As a contribution to accelerate the floodplain restorations in the region, WWF prepared a summary about the main EU funds eligible for different elements of floodplain/wetland restoration processes. Please find attached the document for further use. The brochure is available under this link:  <a href="http://wwf.panda.org/what_we_do/where_we_work/black_sea_basin/danube_carpathian/publications/?248615/EU-funding-opportunities-for-wetland-and-floodplain-restoration">http://wwf.panda.org/what_we_do/where_we_work/black_sea_basin/danube_carpathian/publications/?248615/EU-funding-opportunities-for-wetland-and-floodplain-restoration</a></p>	Information from the document was included in chapter 8.5 and Annex 15.

150	Ch 8.8	<b>GWP</b>	In the final version similar to Annex 2 of Flood Risk Management Plan for the Danube River Basin District (Chapter 7 List of transboundary projects supporting DFRMP) a list of planned projects / actions supporting implementation of JPMs or at least give indication what multi-country actions might assist the implementation of JPMs would be a value	Strategically important projects are mentioned in chapter 8.8.
151	Ch 9	<b>DEF</b>	In the following implementation process it is necessary to improve public participation with information and understanding of the process. It is recommended for the countries to improve public participation processes. An important instrument can be local and regional projects or projects for sectors, municipalities, NGOs, for integrated projects. To make this participation and implementation process better possible it is important to develop small grants without too much bureaucratic demands. To develop such tools could improve the whole implementation process.	Provisions for ongoing public participation/consultation e.g. through the involvement of observer organisations or topical stakeholder dialogue processes on the basin-wide level are elaborated in detail in Chapter 9 of the DRBMP Update 2015. A further integration of this comment into the DRBM Plan is not applicable, as the comment relates to national management plans.
152	Ch 9	<b>Stakeholder WS</b>	There is a lack of designated communication people at international and local level, who can communicate the important messages to the public. The big question is who is really doing the communication work, which is very important.	The responsible actors for communication on the basin-wide level and their responsibilities are identified in Chapter 9 of the DRBMP. The comment is taken into account for the implementation of the DRBM Plan, e.g. cross-links between basin-wide communication activities and the local level will be improved. No further integration of the comment into the DRBM Plan is necessary.
153	Ch 9	<b>Stakeholder WS</b>	There was not enough time for promoting the questionnaires. The questionnaires in this form are for the public, but the plans are for the technical people and these are 2 very different groups.	The criticism about the limited time was noted. The questionnaires were only one of several measures to consult the public; Chapter 9 of the DRBM Plan summarises all measures grouped into four categories. Over-all, there were 7 months of public consultation, one more month than legally required. The questionnaires targeted a general public and served as a tool to raise awareness for the plans; more technical audiences were targeted by other measures; see Ch. 9 DRBMP Update 2015 for further details.
154	Ch 9	<b>Stakeholder WS</b>	Reaching the broad public and engage them in public consultation.	Chapter 9 of the DRBMP Update 2015 outlines the comprehensive strategy that was applied to reach a broad public from different angles through appropriate consultation measures. These complemented the ongoing outreach and public information work of the ICPDR and the stakeholder consultation e.g. through the involvement of observers in drafting policies. No further integration of this comment into the DRBM Plan is necessary.
155	Ch 9	<b>Stakeholder WS</b>	Create concerns and interest about the plan.	This comment is understood to relate to the public information work that will follow the adoption of the plans. As of late 2015, the ICPDR is preparing a public brochure on the two management plans which will contribute to accommodating this comment. Furthermore, the ICPDR is engaged in a range of public information activities in support of "creating concerns and interest", these are also outlined in Chapter 9 of the DRBM Plan. No further integration of this comment into the DRBM Plan is necessary.
156	Ch 9	<b>Stakeholder WS</b>	Clear actions and clear messages are needed in terms of the Plans.	Integrated through the development of an Executive Summary to make the DRBM Plan more accessible. To some extent, this comment is understood to generally relate to the public information work that will follow the adoption of the plans. As of late 2015, the ICPDR is preparing a public brochure on the two management plans which will contribute to accommodating this comment. The ICPDR is engaged in a range of public information activities outlined in Chapter 9 of the DRBM Plan.
157	Ch 9	<b>Stakeholder WS</b>	Policy makers need short and precise information about the Plans.	Integrated through the development of an Executive Summary to make the DRBM Plan more accessible. This comment is understood to generally relate to the ICPDR's public information work that will follow the adoption of the plans. As of late 2015, the ICPDR is preparing a public brochure on the two management plans

				which will contribute to accommodating this comment. The ICPDR is engaged in a range of public information activities outlined in Chapter 9 of the DRBM Plan.
158	Ch 9	<b>Stakeholder WS</b>	It is not explained who participated in the preparation of the Plans. It has to be written who is responsible for the data. It has to be clear who will be responsible for the facilitation of the public participation connected with the plans at local level.	Competent authorities are identified in Annex 1 of the DRBM Plan Update 2015; and Annex 3 of the FRMP. On the level of the ICPDR, Heads of Delegations are identified on icpdr.org and both management plans contain an imprint with contact information. Observers, too, are identified on icpdr.org and sources of comments for this report can be identified in column C of this table. Public participation on the local level is subject to the national management plans and relevant authorities, however, cross-links are identified in Chapter 9 of the DRBMP. Further integration of this comment into the DRBM Plan Update 2015 is therefore not necessary.
159	Ch 9	<b>Stakeholder WS</b>	To train the planners and the decision makers and people who are responsible for the planning and the implementation of the plans how to involve the stakeholder groups and public and to make trainings for better wordings.	Comment is taken into account for the implementation of the management plans, i.e. the ongoing public information work that the ICPDR pursues, but a further implementation into the management plan itself is not considered applicable.
160	Ch 9	<b>Stakeholder WS</b>	More sectors should be engaged in the preparation and public consultation phase of the Plans.	The public consultation activities for the development of the plans are elaborated in Chapter 9 of the DRBM Plan. They are based on a strategy that targeted different stakeholder groups with a comprehensive set of activities. The ICPDR is committed to a maximum of transparency and openness in the drafting of these plans; stakeholders and the general public are actively notified of the various opportunities to contribute to the public consultation. However, the decision to contribute or not is ultimately with these stakeholders / the public and not the responsibility of the ICPDR. Integration of this comment into the management plan is considered to be not applicable.
161	Ch 9	<b>Stakeholder WS</b>	Prepare communication packages for different target audiences (teachers, farmers, etc.)	The comment will be taken into consideration for the ongoing public information work of the ICPDR, which is described in Chapter 9 of the DRBM Plan. It comprises of a great many of communication activities, each of which is aligned with a specific target group. This policy will be continued in the future and stakeholders have an opportunity to contribute to it through ICPDR observer organisations or activities that are open to anyone. e.g. contributions to the magazine Danube Watch. Integration of this comment into the DRBM Plan is considered to be not applicable.
162	Ch 9	<b>Stakeholder WS</b>	Organise forums for territories and also thematic forums (fishery, agriculture, etc.) where to invite specific stakeholder groups. Choose and translate certain messages to local level.	Comment is taken into account for the implementation of the management plans, i.e. the ongoing public information work that the ICPDR pursues. Integration of this comment into the DRBM Plan is considered to be not applicable.
163	Ch 9	<b>Stakeholder WS</b>	If the aim is to reach the general public, it is necessary to have a short summary of the Plans, simple and clear, with infographics and photos within the timeframe of the consultation.	An Executive Summary was developed for the DRBMP Update 2015. The DFRMP is a shorter document, a summary in the document itself was therefore not pursued. However, there will be a public brochure which will summarise both management plans in a non-technical language and which will be published alongside the management plans until January 2016. This is understood to fulfil the request of the comment raised here.

164	Ch 9	<b>Stakeholder WS</b>	It is important to have a face of the message. Celebrity with a simple message. Show the ICPDR faces also, make it more personal. Use more media, TV, organise interviews. Check which communication channel works in each country.	The comment will be taken into consideration for the ongoing public information work of the ICPDR, which is described in Chapter 9 of the DRBM Plan. Several communication activities could be more personalised and the comment will be brought up again when such opportunities arise. Much of the face-to-face (B2C) communication is done in national languages on the country level and therefore relate to the national management plans. Integration of this comment into the DRBM Plan is considered to be not applicable.
165	Ch 9	<b>Stakeholder WS</b>	It could be easier to bring simple messages to the general public – we need the public to push the policy makers – bottom up approach.	This comment is understood to relate to the public information work that will follow the adoption of the plans. As of late 2015, the ICPDR is preparing a public brochure on the two management plans which will contribute to accommodating this comment. The ICPDR is engaged in a range of public information activities outlined in Chapter 9 of the DRBM Plan. Integration of this comment into the DRBM Plan is considered to be not applicable.
166	Ch 9	<b>WWF</b>	In order to strengthen the WFD-FD linkage in the countries, we suggest a stronger highlight for the need to manage joint public consultation processes between RBMP and FRMP in the future.	This comment relates mostly to national management plans, no further integration in basin-wide plans is necessary. Cross-links between the basin-wide plans and national plans as well as cross-links between the two basin-wide plans are elaborated in Chapter 9 of the DRBM Plan Update 2015; as well as Chapter 6 (Integration Issues) of the DRBMP. Cross-links between WFD and FD public consultation work on the national level is the responsibility of individual countries.
167	General	<b>Province Lower Austria</b>	<b>SONDAR CZ-AT</b> 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.	Well noted.
168	General	<b>Province Lower Austria</b>	<b>ELSA European Land and Soil Alliance</b> 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) – many 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.	Comment will be taken into consideration for ongoing public consultation work, in particular with regard to integration issues where soil / agriculture will be of importance. Integration of this comment into the DRBM Plan is considered to be not applicable.
169	General	<b>Stakeholder WS</b>	The plans in this form are not attractive to the general public who are not technical experts. They should be translated in a way that the common people could understand. The best solution would be to draft the Plans themselves from the beginning in a better and more attractive way, meant for a broader audience.	An Executive Summary was added next to the development of a brochure with the aim to communicated to contents to a broader audience.

170	General	<b>Stakeholder WS</b>	Addressing the issue of spatial planning - problems of deforestation, land use and soil compaction, leading to increased risks for flash floods;	In particular and issue for Danube Flood Risk Management Plan.
171	General	<b>Stakeholder WS</b>	Include organic farmers and agriculture sector, harmonize planning documents such as land use plans, agriculture and forestry plans.	Integration need, national level, agri guidance
172	General	<b>Stakeholder WS (GWP CEE)</b>	Look for synergies with landscape planning that is developed in some Danube countries and measures, such as territorial systems of ecological stability and eco-stabilization measures.	Integration need, national level, agri guidance
173	General	<b>Stakeholder WS (InterSus)</b>	Farmers should be involved in the national processes and commitments of the national levels should feed in the plans.	National level
174	General	<b>Stakeholder WS (Slovak Academy of Science)</b>	Long term planning horizon until 2050 and communication with the Danube Strategy.	Formalised exchange with EUSDR is ongoing, an integration of the comment into DRBM Plan not applicable.