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**DANUBE RIVER BASIN MANAGEMENT PLAN –
2021 UPDATE
STATEMENT OF WWF Adria**

As an NGO working in several Danube countries, WWF Adria appreciates the openness of the ICPDR towards transparent and inclusive consultations and inclusion of the approaches that WWF is supporting into the Danube river basin management plans.

KEY COMMENTS and SUGGESTIONS

Restoration, hydrology, sediment

The Plan should reflect higher need and potential for river restoration. Integrated and nature based solutions have to be given priority. Inclusion, active involvement and building of knowledge of different sectors (e.g. agriculture, flood mitigation, nature conservation, and forestry) is vital. Restoration projects should be developed in an inclusive way and supported by additional finances coming from National Recovery and Resilience budgets, the Operational Programmes and Common Agricultural Policy, etc.

Hydropeaking is recognized as a threat on some of the rivers in the Danube Basin (e.g. Drava River). The Plan should promote detailed monitoring of hydropeaking and implementation of mitigation measures to lower the impact on biodiversity.

Commercial sediment excavation has an immense impact on biodiversity in the Danube Basin. The Plan should highly suggest banning of sediment extraction from the Danube basin Rivers (especially Danube, Drava and Sava).

Fish biodiversity



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Measures promoting enabling of longitudinal connectivity, like barrier removals have to be included in the plan. Restoration of habitats of migratory fish species, in particular sturgeons has to be suggested by the Plan as well.

Hydropower and navigation

The Plan should not support building of new hydropower development in the Danube Basin since renewable energy alternatives with lower negative impacts on ecosystems exist. The Plan should hence advocate for upgrading of existing hydropower plants (power generation and environmental mitigation, habitat restoration) and removal of dams (obsolete ones especially). The Plan should also urge the countries to commit to achievement of biodiversity conservation objectives, securing sediment management and sediment continuity and implementation of environmental flows.

The Plan has to suggest and propose design and implementation of mitigation measures for previously built inland navigation infrastructure with negative environmental impact. Need for further infrastructure development have to be carefully assessed and options with the lowest or no environmental impact have to be preferred.

Maps

Map 13, river continuity:

Further explanation of the data points is needed for the 3 dams on Drava River related to fish passes. According to our knowledge or field observations, the 3 dams on the have fish passes that are not designed for the fish species living in the Drava. Some of the dams also don't ensure water in the fish passes throughout the year. The existence of a fish pass doesn't automatically verify that the dam is passable for fish species.

Map14, alteration of river morphology:

Adding a measure to revise and/or harmonise methodologies for defining morphological conditions on joint (transboundary) river stretches which flow along borders is highly suggested. For example the difference between the categorization is quite significant on the HR-HU Drava (class4-5 in Croatian and class 1 in Hungary).

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