



ICPDR Secretariat
ICPDR President Mr. Péter Kovács
ICPDR Executive Secretary Mr. Ivan Zavadsky
Vienna International Centre
Room D 0412
Wagramer Str. 5
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Austria

Dear Péter,
dear Ivan,
dear Sirs,

The Danube Environmental Forum would like to comment on the basic issues for the next cycle of WFD implementation, working plan and timetable, especially on the WFD & FD Public Participation Plan. At the ICPDR homepage it has been announced that commenting is expected until the end of June. Thank you for ensuring this.

The Water Framework Directive (WFD) with its objective of a good status for all waters, including rivers, lakes, groundwater, wetlands and coastal ecosystems, referring to biological and ecological quality, also with its river basin and water body reference and the integrated approach concerning uses and nature protection gives us a good instrument for water protection which should be kept for future. The Floods Directive, too, can be a tool to improve security and river and wetland restoration, supporting natural water retention.

What has been achieved and what is the next future with the next management plans? Did we implement Article 14 the right way, did we do enough to achieve significant improvement of public participation? What can be improved to reach relevant objectives, to implement the non-deterioration principle on one hand and improvements in water ecosystem restoration, especially for the Danube, the rivers and streams, in wetland restoration and natural water retention?

In the ICPDR we have a proven system of cooperation in the working groups although there is relevant political influence with interests from member states contradicting the objectives of the Water Framework Directive or the ecological elements of the Floods Directive. This is especially the case for hydropower development. Lobbying from financially strong interest groups from the infrastructure building, energy and financial sectors sometimes in co-operation with the sectors of agriculture and navigation has emerged in a substantial and paradigmatic change of real objectives and developments. Especially further dam building depreciates the work of WFD implementation and of the ICPDR as a whole because their purpose is to protect rivers, not only to avoid deterioration but to restore and revitalize river ecosystems and their biodiversity.

From this perspective it is essential to include what is threatened in the working plan for special attention. This means also, already discussed right now, that this concern must be an element of the significant water management issues. Biodiversity, renaturalization, habitats and green-blue infrastructure are not only necessary from the aspect to avoid deterioration but from the ecosystem approach of the WFD. For monitoring results or developments biological indicators are important and the objective is the good ecological status. Like the WFD, the Natura 2000 network and the green infrastructure, naturally often along river corridors, stand for European environmental policies. The next phase of WFD implementation must respect and support this by integration in the WFD implementation and the management plans.

Together with PA 6 and other PAs from EUSDR the next management plan should consider biodiversity and green-blue infrastructure, including monitoring, analyses, public participation and stakeholder involvement. Analyses and reports should be given annually, not only covering Natura 2000 areas and species, not only threatened or endemic species in the river basins and concerning countries, but also covering the impact from agriculture e.g. with the crucial effect of colmation and the reaction to eutrophication, pesticides and chemical substances. The river basin, the river corridor and the lifeline of biodiversity, restoring river continuity are elements for analysing biodiversity and green-blue infrastructure together with environmental NGOs, EUSDR and other partners.

To reach the objectives of the WFD and to avoid deterioration it is necessary to improve public participation related to water and river protection, including biodiversity and green-blue infrastructure.

This should include support for travel costs for environmental NGOs, support for additional meetings to protect water and river ecology and the green-blue infrastructure along rivers, for analyses of biodiversity and hydropower, biodiversity and agriculture, biodiversity and flood protection measures.

Public participation as active involvement in the planning like in Article 14 does not work on national levels. In most cases information on the ongoing planning is not good although we have now some information on the last management plan and on water bodies available. After the formal “public participation” after planning (in most cases of no real relevance) there is often no real cooperation on planning and measures with environmental NGOs, civil society and stakeholders, trying to include society and the political sphere into WFD implementation on a national, regional and local level.

To improve this it is necessary that member states and sub-basins report annually on real public participation. Without this much of “participation” will remain to be only formal, more or less on paper. To get some success in the next planning cycle public participation including empowerment and capacity building must be improved substantially.

Kind regards

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