

Dear Ivan! Dear ICPDR Colleagues!

First of all we express our appreciation and thanks for your many years of coordination work, resulting in the third version of the DRBMP update 2021.

The version of the plan submitted for public consultation process contains a great deal of data, information and future suggestions for further improvement of water status of the Danube and its tributaries. Extremely spectacular are already the results of the last approx. 15 years, when the first common international river basin management plan was approved by the heads of delegations of the Danube countries. It is very promising that the pollution load of the river is showing a very significant reduction in terms of both the organic and the nutrients matters, and in many cases the effects of the measures to improving the hydro morphological condition are also already visible. Although these are mainly the result of the targeted investments of the countries, often in the frame of programs funded by EU sources (e.g. implementation of the UWWP and Nitrates Directives), we convinced that their effectiveness and in many cases their implementation has been significantly enhanced by decades of cooperation under the Danube Convention. In recent years, a large number of projects have been launched under the umbrella of the ICPDR, aimed primarily at reducing knowledge gaps and improving cooperation with various relevant sectors.

In our opinion, DRBMP update 2021 presents these results in a very comprehensive, informative, well-edited document that presents the results and further tasks in a clear and comprehensible way. Even without the chapters that are still being prepared, the plan contains a huge amount of new information compared to the previous plans.

The joint results can be well utilized for the national river basin management plans as well (which are currently also in the process of public consultation), as we see in the case of the Hungarian preliminary plan. Of particular note is the significant increase in the knowledge about the hazardous substances pollution and about their potential emission sources, thanks to the JDS4 and other specific research programs. Implementing similar projects requires a level of resources that can only be secured by bringing together several countries. Thanks to all this, we have got a clearer picture of the chemical status of surface and groundwater in recent years, and about the origin of the pollution. Knowledge of these is especially important, for example, in the Tisza river basin, where both the geological origin and the past and present mining and

industrial activities based on it pose a threat to the availability of the good chemical status of water bodies.

It is gratifying that in addition to the “traditional” hazardous substances and other chemical contaminants, very significant new knowledge is already available, e.g. also on the occurrence of the pharmaceutical compounds and their metabolites in waters. Although not yet classified as hazardous substances, nowadays there is an increasing focus on plastic contaminants - both micro- and macro plastics. Progress has also been made in this area in the DRBMP update 2021 compared to the previous ones, with highlighting the topic more prominently in the document. We believe that more joint efforts are needed in this area in the future, including on cross-border pollution. In our opinion, for example, the ICPDR could play a coordinating role in the future in the Tisza basin and its tributaries in the field of periodically severe “PET” bottle pollution, which result in significant contamination of the rivers’ surfaces. More effective co-operation is needed with the professional leadership of the neighbouring countries in this field, which, in addition to water management, also affects sectoral co-operation in waste management and regional development.

From the point of view of both the hydro-meteorological situation in Hungary and the priority activities under the GWP, we find important that the issues of climate change become more and more focused in the joint plans. We welcome that the issue of climate change (and extreme hydrological events such as drought, water scarcity, floods, etc.) is treated as a separate, new SWMI in the 3<sup>rd</sup> plan. Although the effects of climate change are reflected in all key water management issues (as the plan takes into account very carefully in each SWMI issue), we believe that much joint efforts and projects are still needed in this area in the future to ensure truly effective adaptation and mitigation measures, and to gather enough basic information for planning the most effective measures.

The RBMP summarizes the expected investments in the future and their need, e.g. in the field of wastewater treatment. In addition to the investments, the more efficient operation of the existing infrastructures and the improvement of the quality of the authority licensing and inspection activities are also very important factors in the future. Although ensuring these is mainly national competence, it can also help by expanding knowledge, developing guides, organizing workshops and information sharing about good practices under the auspices of the ICPDR. It is therefore welcome e.g. a World Bank-supported project, currently underway, focusing on issues related to the operation of wastewater treatment plants. In the future, similar projects and actions would be important in other areas as well.

In short, with regard to the programs of measures formulated by the DRBMP update 2021, we propose to intensify the joint programs in the following areas as a matter of particular priority for the future:

- Better harmonization of the planning processes of plans and programs relevant to the international Danube river basin (RBMP, FRMP, wastewater treatment program based on national UWWP programs, etc.), with wider application of the IWRM principle in the future through integrated planning tools. An important task of this planning processes is the efficient identification of win-win measures and preparation of integrated Programs of Measures based on them. (A good example of this is the Tisza International River Basin Management Plan / ITRBMP, also prepared under the auspices of the ICPDR.). It may be also the most cost-effective and efficient way of adapting to climate change in the future, in particular importance of the most efficient use of the scarce resources available.
- Climate change and extreme hydrological issues on water status, by way of joint projects, guidelines, catalogues of measures, exchange of experience, etc.
- Further measurement and data collection programs in order to determine the chemical status of waters more precisely, in order to define specific contaminant-specific action programs, with special regard to micro- and macro plastic contaminants and pharmaceutical issues.
- For better understanding of the ecological status of the Danube and its tributaries, and for reduction of differences between the national ecological assessment systems through joint measurement programs (e.g. JDS5 and the Danube Basin intercalibration programs).
- Continuation and extension of activities to other sectors, as a result of which the knowledge about WFD / RBMP of the „water relevant” sectors improves, as well as their readiness to cooperate and participate in specific action programs, in exchanging good practices, in application of BAT techniques, etc.
- Continuation and extension of international Danube-level activities related to the transfer of “lesson learned” experiences and the capacity building on water management issues and on other (new) areas.
- Further expansion of the attention and knowledge of the public, involvement of various strata of the society in order to further improve the condition of the Danube and its tributaries (also in specific areas, e.g. hazardous substances, macro-plastic pollution- e.g. similar to the increasingly popular plastic waste collection campaigns organized in the Tisza River Basin for many years), PP awareness campaigns with further expansion of child, youth competitions and web tools.

We wish you many more successes for this work, and we offer our further cooperation and support on behalf of GWP, including the GWP Hungary.

Budapest, September 9, 2021

Best regards:

Attila Lovas

President of the Board of Trustees GWP Hungary Foundation