

NGO Statement at ICPDR Ordinary Meeting 2014

Five years have passed since the adoption of the first Danube River Basin Management Plan and the second Plan as well as the first Flood Risk Management Plan are taking shape – time for the NGO observers to the ICPDR to take stock of interim achievements and trends from our perspective.

On a positive note and with respect to RBM planning, we are very content with a stronger focus on integration, in particular of sturgeon conservation aspects into all relevant chapters of the Plan as well as a new section on other integration issues, and very much welcome a focus on biodiversity in this context. And we acknowledge that natural water retention measures are highlighted as sustainable option for managing flood risks. However, we miss progress on certain issues, some already raised five years ago, and do hope this can be addressed when revising the draft Plans during and after the public participation phase in 2015. Our concerns relate in particular to

1) Floodplain restoration and other Green Infrastructure aspects

Over the past five years at the “A level”, authorities have not been very ambitious concerning implementing and preparing floodplain restoration measures as an approach serving flood risk mitigation, WFD and Green Infrastructure objectives. The priority ranking approach that should have been developed by now according to the current Programme of Measures is painfully missing. 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.

2) Designation of HMWB

The Lower Danube River water bodies as well as large parts of the free flowing Sava are still designated as heavily modified. The Joint Danube Survey and studies undertaken by WWF and other NGOs have provided clear indications that hydromorphological characteristics of these water bodies have not been substantially changed. We thus hope that 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.

3) Interruption of River and Habitat Continuity

While we welcome further work on the prioritization approach for re-establishing river continuity from a basin-wide perspective, we have seen little evidence that this approach has informed investment decisions. Also, we hope that monitoring the success of fish passage solutions will receive stronger emphasis in the 2nd River Basin Management Plan and that additional measures to improve fish habitat will be proposed.

4) Slow progress on Sustainable Hydropower and Inland Navigation

There is little evidence that since the endorsement of the Guiding Principles for Sustainable Hydropower Development and the Joint Statement for Inland Navigation impacts on water ecosystems and Green Infrastructure have decreased. Without the pressure of civil society, actual progress towards minimizing impact of water infrastructure measures on freshwater ecosystems would have been even smaller. The specific impact of existing water infrastructure on water bodies has been insufficiently monitored and thus specific biological pressure indicators as a basis for sound decision making are still missing in most countries.

5) Cooperation with EUSDR

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.

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