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# Report on Public Consultation Activities for DRBMP & DFRMP Updates 2021



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# 1 Introduction

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## 1.1 Objectives and Legal Framework for Public Participation

The ICPDR is committed to active public participation in its decision-making. The commission believes that this facilitates broader support for policies and leads to increased efficiency in the implementation of measures. The ICPDR pursues the consultation of stakeholders in the entire cycle of ICPDR activities: from conceptualising policies, to implementing measures, to evaluating impacts. A legal framework for this is provided by Article 14 of the EU Water Framework Directive along with Articles 9 and 10 of the EU Floods Directive.

As of 2020, an increased awareness of environmental issues, a growing appreciation for the ways in which the environment affects public health, and the more direct contact of social media, public participation in these processes is very much on the rise. The ICPDR has taken this opportunity to further open its doors and mechanisms to invite the public to participate in a variety of ways – and the public is growing increasingly engaged as a result. This has been a vital shift, considering that environmental policy and management only succeed if key stakeholders feel engaged, and buy into the design of all the actions concerned.

A ‘bottom-up’ approach today means that people can share information and responsibilities; they can partake in the design of programmes; monitor and evaluate progress; and all without central management. Key forms of participation, such as the dissemination of information, public advocacy, public hearings and litigation, assist environmental decision-makers in identifying the concerns of the general public. A recent shift towards decentralising strategies also encourages the active participation of organized groups, communities, and citizens at a more local level. The increasing number of ways in which the public can be reached is useful for broadening our methods and putting together a new approach for engaging the public, exploiting rising awareness in order to facilitate broader support for our activities and policies, and greater efficiency in their effective implementation.

## 1.2 Observers to the ICPDR

In keeping with commitments to engaging the public, the ICPDR maintains a close relationship with a variety of organizations representing public interest – defined by the DRPC as “*Observers*”. While said observers are not granted decision-making rights, they actively participate in all meetings of ICPDR expert groups and task groups, as well as plenary meetings (Standing Working Group and Ordinary Meetings). Active participation means that delegates of observers have both access to information including all technical meeting documents as well as the right to contribute to all discussions.

Observers represent a broad spectrum of stakeholders in the Danube River Basin, covering social, cultural, economic and environmental interest groups adhering to the goals of the Convention. The connective tissue between observers and the ICPDR is a shared ‘community responsibility’, essential to achieving long-term sustainable water management goals.

Institutionally, observers can comprise interest groups, non-government organizations (NGOs), and intergovernmental organizations. As of 2021, there are 24 organizations approved as observers, all of which had the opportunity to contribute to the development of these two Management Plans through the relevant Expert Groups, Task Groups and plenary meetings.

### ICPDR Observers as of 2021

Black Sea Commission (BSC)	International Association for Danube Research (IAD)
Carpathian Convention	
Central Dredging Association (CEDA)	International Association of Water Supply Companies in the Danube River Catchment Area (IAWD)
Danube Competence Center (DCC)	
Danube Civil Society Forum (DCSF)	International Hydrological Programme of the UNESCO (IHP/Danube)
Danube Commission (DC)	
Danube Environmental Forum (DEF)	International Sava River Basin Commission (ISRBC)
Danubeparks	
Danube Sturgeon Task Force (DSTF)	RAMSAR Convention on Wetlands
Danube Tourist Commission (DIE DONAU)	Regional Environmental Center for Central and Eastern Europe (REC)
European Anglers Alliance (EAA)	VGB PowerTech e.V. (VGB)
European Barge Union (EBU)	viadonau
European Water Association (EWA)	World Wide Fund for Nature – Central and Eastern Europe (WWF-CEE)
Friends of Nature International (NFI)	
Global Water Partnership (GWP-CEE)	

Active participation means that delegates of observers have both access to information including all technical meeting documents as well as the right to contribute to all technical discussions. Observers are only excluded from administrative and legal issues of the ICPDR. Observer delegates do not have a vote in meetings. However, especially at the level of expert groups and task groups, votes take place only rarely as the groups work towards consensus through discussions.

### 1.3 Public Participation, Communication and Outreach

In practice, the ICPDR pursues public participation through a variety of avenues.

Public information, educational initiatives and outreach activities are utilized in support of public involvement along with the more general use of social media as a communication tool.

The ICPDR is specifically engaged in the following public participation activities:

- **Public information dissemination.** This includes content and news pieces on ICPDR.org, social media posts, technical and public reports, brochures and general publications (e.g. *Danube Watch*);
- **Awareness-raising educational resources, including environmental education.** This includes a variety of proposed new materials, awareness raising activities (e.g. the annual *Danube Day* festivities, *Danube Art Master* competition, and more) plus outreach;
- **Public consultation activities.** These can be events such as public workshops (e.g. *Our Opinion – Our Danube*) regarding the development of River Basin and Flood Risk Management Plans, and the opening of subject-related communication channels or consultation workshops. The use of ICPDR.org, social media, and all ICPDR communications channels for publishing and promoting information about these issues is essential.

## 1.4 Public Consultation for the DRBMP & DFRMP Updates 2021

The ICPDR develops its key management plans at 6-year intervals: one River Basin Management Plan and one Flood Risk Management Plan for the Danube River Basin. Both of these plans lie at the core of the ICPDR's central work programs, and as such, they should be developed with the strong involvement of civil society, stakeholders, and the general public from the start via public participation events such as consultation workshops. The previous round of updates occurred in 2015, and a report on that Public Consultation Process can be found on the ICPDR website [here](#).

### 1.4.1 Public Consultation Schedule

The following is the **primary schedule for Public Consultation** regarding the development of the DRBMP & DFRMP plan updates from 2019 – 2021:

1. Dec 2019 – Dec 2020: Preparation of draft DRBMP & DFRMP Updates 2021 before publication;
2. March 2020: Publication of DFRMP Risk and Hazard maps;
3. March 2021: Publication of draft DRBMP & DFRMP Updates 2021 for public comment;
4. March 2021 – Sep 2021: Collection of comments from the public;
5. June 2021 – Dec 2021: Revision of draft plans; comments made available online;
6. Dec 2021: Endorsement/publication of revised DRBMP & DFRMP Updates 2021.

Public consultation for each of these steps spanned a period of six months, in which the opportunity to provide comments was actively promoted through the ICPDR network of contracting parties and observers, a questionnaire disseminated via ICPDR.org, social media platforms, and the magazine *Danube Watch*. The three stages were:

- Timetable and work programme document were published for comments from 19 December 2018 to 19 June 2019;
- SWMI document was published and made available for consultation from 20 December 2019 to 22 June 2020;
- Draft DRBMP Update 2021 and draft DFRMP Update 2021 (including Flood Risk Maps and Flood Hazard Maps) were both made available to the public for comment from 31<sup>st</sup> March – 30<sup>th</sup> September 2021.

### 1.4.2 Comments Submitted in Writing

The review and commenting on technical documents such as the DRBMP & DFRMP Updates 2021, requires a high level of understanding with regard to river basin management. Thus, while commenting is open to anybody and everybody in the Danube River Basin, the opportunity to comment on the draft plans in writing is primarily advertised to organised stakeholders with sound technical capacity and expertise, such as ICPDR observers.

Until 30<sup>th</sup> September 2021, written communications with comments on the plans were received from a total of 11 organizations and 165 private individuals. The comments and organisations represented a range of interests, and all of these comments (some of which are extensive documents relating to several

different sections in the plans) have been published on the ICPDR website and processed further for this report. Visit the ICPDR website here for further information.

### 1.4.3 Stakeholder Consultation Workshop

The Stakeholder Consultation Workshop, *Our Opinion – Our Danube*, was a one-and-a-half day (online) event hosting more than 200 participants. Stakeholders and interested parties from across the Danube were invited to contribute their input to the Public Consultation process for the Danube River Basin Management Plan (DRBMP) & Danube Flood Risk Management Plan (DFRMP) Updates 2021. Both Plans are being revised and updated to guide the direction of the ICPDR for the next six years until 2027. Holding this event was one of the pivotal aspects for their successful and effective implementation.

Representatives of civil society and stakeholders were asked to contribute their views and have their say. The people of the Danube River Basin will be affected by the measures in the plans for generations to come and it is important that they are involved in their development from the outset.

The preparations for the 2021 event started with ICPDR and Global Water Partnership Central and Eastern Europe (GWP CEE) working on the framework of the event, including the scale, format, platform, and roles and responsibilities. It was decided that there would be two core blocks of the event: the *Stakeholder Statements*, and the *Danube Café* discussion sessions.

The stakeholder statements allowed the participants to address the DRBMP and DFRMP Updates 2021 and inform the remaining audience about their findings as well as their point of view regarding related issues. These statements were collected before the event to ensure a good technical flow of the session and a proper support from the organizers.

Five pre-determined Thematic Areas, relevant to the two plans, were discussed in a series of *Danube Café* workshop sessions. The outcome of these sessions was gathered and delivered during the *We Discussed Danube* session on the second day of the workshop, and all comments will be taken into consideration during the finalization of both plans due in December 2021.

The chosen Thematic Areas included:

- Organic, Nutrient and Hazardous Substances Pollution of Surface and Groundwater
- Hydro-Morphological Alterations & Integration Issues (Flood Risk Management, Hydropower, Nature Protection, Navigation, Agriculture)
- Objectives and Measures of Flood Risk Management Plans
- Support to Implement Both Plans, Financing of the Measures
- Communication and Public Participation

A full report on this event was produced and can be found in the Annexes of this document or on the ICPDR website here.

## 1.4.4 Online Questionnaire

To expand the target groups of public consultation beyond expert stakeholders, a simple and accessible online questionnaire on the subject of both the DRBMP & DFRMP Updates 2021 was developed by the ICPDR for inclusion on its website: ICPDR.org.

The target group for this questionnaire included the interested, but less informed, members of the public. The questions related to very general aspects of the management plans, and sought feedback from the public in an attempt to both teach them about the plans, and confirm their satisfaction with the proposed measures. It also sought to shed light on the priorities of the general public with regard to climate change prevention, managing flood risks, and various other activities included in both the DRBMP & DFRMP Updates 2021. It hoped to draw attention to the plans and its public consultation measures.

The Online Questionnaire was run on ICPDR.org/forms for a period of 6 months from 1<sup>st</sup> April 2021 – 30<sup>th</sup> September 2021. A total of **350** individuals opened the questionnaire; **265** individuals filled in up to and including question 5; **255** individuals filled in up to and including question 8; **232** individuals fully filled in the entire questionnaire. The questionnaire was available in **11 languages**: (English; Bulgarian (Български); Croatian (Hrvatski); Czech (Čeština); German (Deutsch); Hungarian (Magyar); Romanian (Română); Serbian (Српски); Slovak (Slovenčina); Slovenian (Slovenščina); Ukrainian (Українська)).

The full results and insights taken from this Online questionnaire are included in the Annexes of this report.

## 1.4.5 Social Media Campaign

To include the general public that would not be targeted by the other measures, a social media campaign was implemented as part of the communications activities throughout the Public Consultation Process, with an additional focus leveraged for the Stakeholder Consultation Workshop. The campaign relied on small and interesting pieces of information (“factoids”) that should attract attention to water management issues and finally the draft management plans, along with repeated calls-to-action encouraging participation in the Online Questionnaire or Stakeholder Consultation Workshop.

During a 14-day period around the Stakeholder-Workshop (20<sup>th</sup> June - 3<sup>rd</sup> July), almost 10% of the impressions based on campaign activities were generated (27.5k) with the relevant hashtag (#OurDanube) put to use 18 (131 in total) times.

In the period between 31<sup>st</sup> March – 30<sup>th</sup> September 2021, the campaign yielded 59 new Twitter followers; 143 new Facebook followers; 63 new Instagram followers; 13,033 interactions (Twitter mentions, retweets and Facebook stories created for the profiles to this group); as well as more than 300,000 impressions (the combined number of potential users who saw content associated with the Twitter & Facebook profiles connected to the relevant Twitter and Facebook accounts).

A detailed report on the social media activities was published online at ICPDR.org and is also included in this report below in the Annexes section.

## 1.5 Development & Use of this Public Consultation Report

To ensure the highest possible transparency, all comments making suggestions, requesting changes, asking for additions to either the DRBMP Update 2021 or DFRMP Update 2021 were collected and processed by the relevant ICPDR expert or task groups.



This report is due to be published alongside with the two final texts for the management plan updates in December 2021. It will be sent to all organisations and individuals that participated in the public consultation activities and will be published on ICPDR.org. A table detailing the comments received throughout the consultation along with EG/TG treatments is included in the Annexes of this report.

## **1.6 Links to Public Consultation on the National Level**

The DRBMP Update 2021 is intended to provide a basis for basin-wide policy, augmented by national and sub-basin management plans. The basin-wide process of drafting of these management plans was thus also developed in conjunction with national-level endeavours in the field of public consultation, thus taking into account specific priorities throughout the region. This supports the Plan's position between the responsible authorities and interlinks national-level public consultation activities with those at basin-wide level. All information on national SWMI documents and draft RBM Plan consultation measures were thus collected and centrally published via ICPDR.org. Information on the ICPDR documents in question was in turn published on the respective national consultation websites. In addition to online resources and unified basin-wide planning documents, meetings of the ICPDR and its expert group for public participation further supported a basin-wide exchange on the national consultation work.

To make access to these links easier, a central page on ICPDR.org was created to cross-link all relevant website entries at: <http://www.icpdr.org/main/activities-projects/public-consultation-2021-management-plans>

## **1.7 Public Consultation Links Between DRBMP & DFRMP Updates 2021**

All activities related to public consultation described here for the two Plans are sought to mirror to the greatest extent possible the steps towards the finalisation of both plans. This applies in particular to the publication of the timetable and work programme document. In adherence to this approach, the online questionnaire was developed as one document covering both plans, another illustration of the interlinkages between the two plans and directives. Furthermore, the stakeholder consultation workshop will be planned as a joint activity to highlight the overlapping interests between both the DRBMP and the DFRMP Updates 2021. An additional benefit of addressing both draft plans within one workshop is to maximize efficiency, amplify synergies, and increase attendance.

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## 2 Annex A: Overview table & responses

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The following tables break down the individual requests for changes to the draft DRBMP & DFRMP Updates 2021 together with information on the relevant chapter they relate to, which organisation raised it and how it was dealt with – if it resulted in changes, information was given on which; if it was rejected, a reason was given why. The tables draw from all public consultation measures described in this report.

This Annex contains 4 tables:

***2.1 Danube River Basin Management Plan Update 2021 – Comments Received in Writing***

***2.2 Danube River Basin Management Plan Update 2021 – Stakeholder Workshop***

***2.3 Danube Flood Risk Management Plan Update 2021 – Comments Received in Writing***

***2.4 Danube Flood Risk Management Plan Update 2021 – Stakeholder Workshop***

## 2.1 Danube River Basin Management Plan Update 2021 – Comments Received in Writing

Nr.	Ch.	Ref.	Organis.	Comment	Relevant EG	Treatment of comment
1	2	2.1.6, pg. 31	WSV	<p><b>Zitat:</b> „morphological alterations, disconnections of adjacent wetlands/floodplains, and alterations caused by future infrastructure projects may impact water status. Also disturbed or severely altered sediment balance is addressed within hydromorphological alterations, although it has not yet been analysed in depth in relation to WFD objectives. Thus, the sediment issue is currently addressed as an intrinsic part of hydromorphological alterations (e.g. within impoundments, morphological alterations).“</p> <p><b>Anmerkung:</b> Veränderungen durch zukünftige Infrastrukturprojekte können sich nicht auf den ökologischen Zustand des Gewässers im IST-Zustand auswirken. Mit allen neuen Projekten müssen das Verschlechterungsverbot und das Verbesserungsgebot eingehalten werden. Genau das ist auch Gegenstand des kurzen Kap. 2.1.6.4. An dieser Stelle gehören die zukünftigen Infrastrukturprojekte nicht in die Aufzählung. Zudem wären es nicht nur Infrastrukturprojekte, sondern auch andere Projekte (z.B. eine neue Wasserkraftnutzung), die geeignet sind sich (negativ) auf den Zustand des Gewässers auszuwirken. Das Kap. 2.1.6.4. mit dem Verweis, dass die Projekte nur kommen, wenn sie keine Auswirkungen haben oder Minderungsmaßnahmen mitgeplant werden, stellt dies richtig dar (<i>detailed justification provided in document</i>).</p>	HYMO	The sentence about future infrastructure projects in chapter 2.1.6 ("key findings and progress") was rephrased.
2	2	2.1.6.1	WWF Adria	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 ( <i>detailed justification provided in document</i> ).	HYMO	An additional sentence on "monitoring of hydropeaking" was added in chapter 8.1.5.1 on Hydrological Alterations.
3	2	2.1.6.2	WWF Adria	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) ( <i>detailed justification provided in document</i> ).	HYMO	Additional sentences addressing "commercial sediment excavation" were added in chapter 8.1.5.2 on Sediment Balance Alterations.

4	2	2.1.6.2.1	<p><b>DECLIC</b></p> <p>In figure 2 is depicted the grim situation of the rivers in the Danube River Basin. Despite the grim picture, the situation is getting worse, instead of improving. A quite large share of the DRB is in Romania. The rivers here are devastated, and the cause of this devastation can be found in the European Parliament resolution of 17 December 2020 on the implementation of the EU water legislation, at letter R: the conflict of interests. As long as these conflicts of interest which govern Romanian Waters National Administration persists, the non-deterioration principle is useless. Fake studies of impact assessment on the water bodies are always available in Romania, from the satellite companies of "Romanian Waters".</p> <p>So the DRBMP needs to include strict measures, at least basic, common-sense restrictions, instead of descriptions and statistics. Strict measures cannot be bypassed. Otherwise, the plan is just a kind of fairy tale. The two previous DRBMPs failed to address the appetite for destruction of "Romanian Waters", and we cannot afford a third failure. Tens of water bodies were destroyed in Romania, by new river regulation works, in the last years. And the alterations are about to increase, due to the financing of grey infrastructure measures from EU funds (LIOP, SO 5.1). The most outrageous is the river regulation project meant to alter the course of the Western Jiu River (such wrong examples should also be mentioned in the DRBMP).</p> <p>The draft plan states that: "Hydromorphological alterations in the DRBD are mainly caused by flood protection measures". So new morphological alterations must be reduced to the minimum.</p> <p>The negative impact of the river regulation works is mentioned throughout the document. As written on page 94 of DRBMP, the EU Biodiversity strategy imposes restoration of 25.000 km of rivers. Before restoring, we must stop altering new river stretches by new river regulation projects, otherwise, the whole effort is non-sense. On page 55 in the draft plan is stated:</p> <p>"Considering described changes, it is even more important to prevent rivers from further deterioration due to new man-made physical modifications."</p> <p>It follows from the above that clear prohibitive measures against new morphological alteration in DRB must be included in the DRBMP.</p> <p>Examples of minimal measures which need to be introduced in the plan:</p> <ul style="list-style-type: none"> <li>- Bank reinforcements outside the built-up area of the settlement are forbidden.</li> <li>- River re-profiling works are forbidden.</li> <li>- Building new weir sills is forbidden.</li> </ul> <p>Exceptions can be included, provided that these have a levy localized impact and are very rarely applied. Massive morphological alterations must be clearly forbidden.</p> <p>Last but not least, there are obvious fake data in the draft plan that must be corrected, otherwise they make the whole document seem unreliable. Most of the morphological</p>	<p><b>HYMO, RBM, RO</b></p>	<p>A reference to the need for "prevention of further deterioration" has been added in all relevant sub-chapters of chapter 8.1.5, including references to the implementation of transparent impact assessment for new infrastructure projects (application of Guidance No. 36 on Article 4(7) Exemption) and efficient mitigation measures. Referring to the comments relating to the Romanian situation, the following aspects shall be considered:</p> <ul style="list-style-type: none"> <li>a) It is important to specify that all institutional aspects are nationally addressed and not on basin wide level. Secondly, the national contribution to the DRBMP is made by the competent authorities established by the countries, according to the national law;</li> <li>b) Member States have the obligation to implement the provisions and requirements of the Water Framework Directive (WFD). At the same time, as a contracting party to the Danube River Protection Convention, Romania (as any DRB country) follows the jointly agreed approaches, in order to support the achievement of the WFD objectives in a very large, unique and heterogeneous European river basin by considering the commonly agreed basin-wide visions, management objectives and related measures, including the ones for addressing the existing and future hydromorphological alterations;</li> <li>c) Having in view implementation of WFD along the 3rd implementation cycle, the update of DRBMP 2021 gives a higher importance to the hydromorphological restoration and mitigation measures. Therefore, win-win solutions considering natural retention measures and improving the connectivity are subject of an increased number of measures proposed in the frame of 3rd DRBMP, national MPs and sub-units MPs;</li> <li>d) In this context, the future national infrastructure projects will be promoted and implemented in compliance with the requirements of WFD, EIA (including Impact Assessment on Water Body) and SEA</li> </ul>
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				<p>alterations of different categories, counted in the plan, are underscored. As for significant water abstractions, the data in figure 26 is very far from the truth. In Romania, there are several hundreds of significant water abstractions caused by the hydropower industry. For instance, as you can find on page 155 in the book "Water Resources Management, Methods, Applications and Challenges", 81 watercourses are diverted for only one hydropower plant. We understand that ICPDR has no means to perform a real count, so just centralizes data from the water administrations of each country, which have no interest to describe the real picture. Alternative sources must be found. For instance, for significant water abstractions in the Balkan part of the DRB, you can contact Riverwatch. Fortunate cases, like the one of the undisturbed Râu Alb River (valuable for reference conditions), hardly saved from a hydropower project and, so far, from an industrial fish farm project, should also be mentioned in the DRBMP (detailed justification is provided in document).</p>		<p>Directives and will follow the agreed basin-wide criteria.</p> <p>Same "treatment of comment" for all 165 individual feedback/input received via the NGO platform DECLIC.</p>
5	2	2.1.6.4, Future Infrastructure Projects (Pg, 52)	<p><b>MEASURES</b></p> <p>Conservation and restoration of ecological corridors (The concept of a river basin as an ecological corridor encompasses the physical waterbody as a migration route or passageway for aquatic organisms, different categories of habitat, its inherent habitat use and "habitat-using"-fish populations, as well as all processes and exchanges like information (e.g. behavioural, genetic), turnovers (e.g. energy, biomass, bed load) necessary for the ecological functioning of the system to support viable populations of native fish and migratory species) should be adequately considered in any further planning and management activities. In order to account for the ecological corridor and its elements in pressure evaluation and status assessment as well as in management and planning we suggest to add:</p> <p>These projects, if implemented without full consideration to effects on water status, are likely to provoke impacts on water status due to hydromorphological alterations and impediment to migratory fish and other organisms. These projects need to be addressed accordingly and since the planning phase, it is needed to integrate green infrastructure, nature based solutions and mitigation measures in order to reduce/cancel the potential impacts on water status (suggested amendments highlighted in blue) (<i>detailed justification provided in document</i>).</p>	HYMO	<p>The proposed additions have been added/re-phrased in chapter 2.1.6.4 on Future Infrastructure Projects.</p>	

6	2	2.4, pg. 63	WSV	<b>Zitat:</b> „With the publication of the 5th IPCC Assessment Report (...)“ <b>Anmerkung:</b> 2021 ist der 6. IPCC Bericht erschienen ( <i>detailed justification provided in document</i> ).	RBM	A reference to the 6th IPCC Report is made.
7	2	2.1.9.3	TID(Y)UP	The partners welcome the dedicated chapter 2.1.9.3 of the draft DRBMP on the plastic pollution issue and recognize that the thereby mentioned topics and knowledge gaps are well aligned with the activities of the project. Hence, in the followings we detail how our experiences and the project outcomes contribute to tackling this serious environmental issue. In this section we detail our specific work and contribution in relation to the below topics as mentioned explicitly in the aforementioned chapter. The partnership is keen to provide further details upon request about any of the items detailed below in case the ICPDR is interested to learn more and/or to integrate any of the below suggestions into the next version of the DRBMP ( <i>detailed justification provided in document</i> ).	PM, MA	A reference was added to the project highlighting its activities on the plastic issue in chapter 2.1.9.3.
8	3	Pg. 66	MEASURES	Comment on the word "expected" in last sentence of paragraph on the page 66: to reword to present final result ( <i>detailed justification provided in document</i> ).	RBM	The sentence was re-phrased.
9	3	Pg. 66 (The Pan-European Action Plan for Sturgeons text box)	MEASURES	Second sentence, second paragraph: instead "All" to be written "Most" ( <i>detailed justification provided in document</i> ).	RBM	The sentence was re-phrased.
10	3	Pg. 66 (The Pan-European Action Plan for Sturgeons text box)	MEASURES	Comment on the third sentence, second paragraph: "In 2021 the fishing ban order of Romania entered into force for an unlimited period of time and Bulgaria has renewed the 5-year time limit of its ban until 2025" ( <i>detailed justification provided in document</i> ).	RBM	The aspect was added, the sentence re-phrased.

11	3	Pg 66. (The Pan-European Action Plan for Sturgeons text box)	<b>MEASURES</b>	Comment on footnote 57: "and are assessed as unfavourable bad in the latest reporting of the Habitats Directive. also add IUCN classifications"? <i>(detailed justification provided in document).</i>	<b>RBM</b>	The aspect was added, the sentence re-phrased.
12	4	4.1, Surface Water, section Ecological status/ecological potential (Pg. 67)	<b>MEASURES</b>	Ecological status results from assessment of the biological status of all WFD biological quality elements (fish, benthic invertebrates, phytoplankton, phytobenthos and macrophytes) and the supportive physico- chemical parameters (general and specific pollutants) as well as hydromorphological parameters (hydrological regime, river continuity and morphological conditions, i.e. of habitats and the ecological corridor), following the principles stipulated in the WFD Annex V <i>(detailed justification provided in document).</i>	<b>HYMO, MA</b>	This proposal will not be added, as the sentence only refers to parameters related to the WFD; habitats and ecological corridor are not listed within WFD parameters.
13	4	4.1.6, Gaps and Uncertainties of Status Assessment of Surface Water Bodies (Pg. 80 – 81, paragraphs three and four)	<b>MEASURES</b>	The way forward presented in the DRBMP Update 2015 necessitated that the missing sampling and assessment methods shall be developed and that the already existing sampling and assessment methods should be transferred between the countries and adapted to the local needs. Special attention was suggested to be given to further development of ecological assessment methods for phytobenthos, phytoplankton, macrophytes and fish. The Danube Migratory Fish Habitat Manual developed in MEASURES can serve as a valuable basis (MEASURES 2021b). Information exchange between the national experts was considered to be an important prerequisite for this process. All these recommendations had been materialised during the JDS4. The new active approach applied in JDS4, which included the training workshops for each biological quality element organized prior to the survey, provided an excellent opportunity for harmonization and training in WFD related monitoring. Some uncertainties concerning fish assessment are remaining though. In addition, there is a lack of experiences with methods for ecological potential assessment for HMWB stretches of the Danube and its tributaries (including reservoirs). Future activities have to be focused on sharing knowledge and harmonizing methods among the Danube countries on the assessment methods for the ecological potential for relevant biological communities (especially for benthic invertebrates and fish). This should include experience with MEP setting and selection of relevant BQE and relevant metrics <i>(detailed justification provided in document).</i>	<b>HYMO, MA</b>	The reference to MEASURES manual shall not to be included because it does not deal with the ecological status assessment methods. The second proposal was added and the sentence in chapter 4.1.6 on Gaps and Uncertainties re-phrased.

14	5	5.1, Management Objectives (pg. 88-89)	<b>MEASURES</b>	b. help to bridge the gap between measures on the national level and their agreed coordination on the basin-wide level to achieve the overall WFD environmental objective. This requires the identification of opportunities for basin-wide level exchange of different sectors ( <i>detailed justification provided in document</i> ).	<b>RBM, HYMO</b>	The sentence was added in chapter 5.1 on Management Objectives.
15	6	Integration Issues (pg. 90)	<b>MEASURES</b>	Strengthen inter-sectoral exchange and cooperation on transboundary and basin-wide scale MEASURES has proven the effectiveness of national cooperation via a series of national workshops, to which stakeholders from different sectors were invited and attended. We think the networks established should be strengthened, in particular as we see also potential for future transboundary and international exchange. Therefore, we propose after the first sentence as follows: The integration with other sector policies is an important issue in the Danube River Basin in order to create synergies and avoid potential conflicts. Activities are ongoing to continuously implement and further intensify the exchange with different sectors such as inland navigation, hydropower, agriculture, and nature protection including sturgeon conservation activities. The Local Migratory Fish Networks established in several Danube countries in the MEASURES project have proven to be good platforms for stakeholder discussion and debates on a specific target and can be used as a basis for future efforts ( <i>detailed justification provided in document</i> ).	<b>RBM, HYMO</b>	The proposal was rephrased, referring to "platforms for stakeholder exchange" (including eg Migratory Fish Networks within the MEASURES projects), and included in chapter 6 on Integration Issues.
16	6	Integration Issues (pg. 90)	<b>MEASURES</b>	The integration with other sector policies is an important issue in the Danube River Basin in order to create synergies and avoid potential conflicts. Activities are ongoing to continuously implement and further intensify the exchange with different sectors such as inland navigation, hydropower, agriculture, and nature protection including sturgeon conservation activities. Opportunities for basin-wide level exchange of different sectors have to be identified and agreed upon ( <i>detailed justification provided in document</i> ).	<b>RBM</b>	The sentence was re-phrased.



17	6	Integration Issues (pg. 90)	WWF CEE	<p>We recommend to add to chapter 6, Integration Issues (pag. 90), after the first sentence as follows (in blue):</p> <p>The integration with other sector policies is an important issue in the Danube River Basin in order to create synergies and avoid potential conflicts. Activities are ongoing to continuously implement and further intensify the exchange with different sectors such as inland navigation, hydropower, agriculture, and nature protection including sturgeon conservation activities. The Local Migratory Fish Networks established in several Danube countries in the MEASURES project have proven to be good platforms for stakeholder discussion and debates on a specific target and can be used as a basis for future efforts (<i>detailed justificationj provided in document</i>).</p>	RBM, HYMO	See response to comment 8/4a/6 from MEASURES (comment number 15).
18	6	6.2, River Basin Management and the Marine Environment	WWF CEE	<p>Add at the end:</p> <p>“Other issues include e.g. the migration of anadromous migratory fish species like sturgeons from the Black Sea to the upper reaches of the Danube. With respect to the latter, the ICPDR and the Contracting Parties will use the dialogue between ICPBS and ICPDR parties to analyse and agree on sturgeon conservation actions (<i>detailed justificationj provided in document</i>).</p>	RBM	The sentence was added.
19	6	6.3, Pg. 93	MEASURES	<p>Infrastructure projects, which are fully or partly located in protected freshwater habitats and which are likely to have a significant effect must be carefully planned and assessed in order to avoid conflicts. Promoting Green Infrastructure and nature based solutions should be the basis of any planning. EU Habitats Directive Article 6(3) provides for an appropriate assessment of the impacts of such plans or projects (<i>detailed justification provided in document</i>).</p>	RBM	The sentence was re-phrased, by adding "as much as possible".
20	6	6.4	WWF CEE	<p>As the JDS4 has shown, hydromorphological pressures on fish are apparent along the whole Danube and there is no general improvement since the last Plan. However, measures that are likely to improve the status of fish are largely limited to fish passes with various levels of ambition.</p> <p>Romania, to give one example, indicates as current status 116 river continuity interruptions while only 1 fish migration aid is planned. It is difficult to understand why the level of ambition is so low if e.g. Bulgaria aims for considerably more.</p> <p>We recommend countries to increase the number of measures for improving longitudinal connectivity in both Danube basin (chapter 8.1.5.2.1 Interruption of River Continuity for fish migration) and national plans and for the coming years as matter of priority. This entails the performance of restoration potential analyses on rivers, then preparation of a pipeline of implementation projects, including stakeholder involvements, for fish migration aids but also other measures, such as barrier removals (especially of obsolete</p>	HYMO, RBM	One additional bullet point was added in chapter 8.1.5.2 on Interruptions of River Continuity and Sediment Balance Alteration, in the sub-chapter on vision and management objectives, referring to "measures which should build on existing knowledge and evidence". The comment related to monitoring of habitats of migratory fish species has been included in chapter 2.1.7 on "Gaps and Uncertainties of the Hydromorphological Alteration Assessment". The investigation in relation to effects of vessels has been added to chapter 8.1.5.3 on "Morphological Alterations".

				dams). While sturgeon conservation is woven into several chapters of the plan - which we appreciate - we see the need to include identification, restoration and monitoring of habitats of migratory fish species, in particular sturgeons, in the chapter River Morphological Alterations and to commit to closer cooperation between water management authorities and authorities responsible for nature protection and biodiversity. As the integration chapter 6.4. on navigation concludes, the impact of vessels on fish fauna is likely to be considerable, judging from a pilot study on the Austrian Danube. The development of mitigation measures should therefore be included in the Joint Programme of Measures. <i>(detailed justification provided in document)</i> .		
21	6	6.4, Inland Navigation and the Environment (Pg 96)	<b>MEASURES</b>	add the following bullet point to the existing list • Promote as much as possible green infrastructure and nature based solutions <i>(detailed justification provided in document)</i> .	<b>RBM</b>	This aspect was added in the list of bullet points.
22	6	6.4, Inland Navigation and the Environment (pg 96),	<b>WWF CEE</b>	To chapter 6.4., Inland Navigation and the Environment (page 96), add the following bullet point to the existing list - Promote as much as possible non-structural measures and minimise the impacts of structural interventions through mitigation and/or restoration and giving preference to reversible interventions. It is also suggested to add a paragraph at the end of this chapter: Another emerging challenge that needs further investigations and agreement on measures is the impact of the growing passenger transport on water quality due to a lack of suitable waste collection and treatment facilities on land <i>(detailed justification provided in document)</i> .	<b>RBM</b>	This aspect was added in the list of bullet points.
23	6	6.4, pg. 96	<b>WSV</b>	<b>Zitat:</b> „In 2014, a “Fairway Rehabilitation and Maintenance Master Plan for the Danube and its na-vigable tributaries” was elaborated in the frame of the EU Strategy for the Danube Region.“ <b>Anmerkung:</b> Quellenangabe fehlt <i>(detailed justification provided in document)</i> .	<b>RBM</b>	The reference was added.

24	6	6.4	WWF CEE	<p>As the DRBMP states well, the implementation of the “Guiding Principles on Sustainable Hydropower Development in the Danube Basin” is behind schedule. In order to achieve a considerable change, hydropower would require a drastic transformation of operation and approaches in order to play a role in sustainable energy supply. The DRBMP should state more clearly that new hydropower infrastructure in Danube countries should be avoided as there are renewable energy alternatives with lower negative impacts on ecosystems. Therefore, financial incentives such as subsidies for new hydropower development on rivers, big or small, have to be stopped. The hydropower sector needs to improve environmental performance by:</p> <ul style="list-style-type: none"> <li>- upgrading of existing hydropower plants both in terms of power generation and environmental mitigation (e.g. installing functioning fish passes (e.g. Iron Gates), habitat restoration) as well as removal of dams (esp. obsolete ones)</li> <li>- committing to biodiversity conservation objectives (e.g. action plans for migratory fish), sediment management, and environmental flows</li> <li>- covering full costs for mitigation action and if that is not possible, hydropower plants have to be decommissioned.</li> </ul> <p>Concerning inland waterway transport, the ongoing and planned navigation infrastructure projects made clear the formidable challenges of meeting navigation as well as WFD and nature conservation objectives but also the possibility of doing so if there is a strong will. This path has to be followed. If there are indications that previously built fairway infrastructure has negative environmental impact, mitigation measures must be planned and implemented. Missing waste treatment facilities for passenger ships and the impact of waves on fish are other challenges to be tackled as matter of priority (<i>detailed justification provided in document</i>).</p>	RBM	<p>The text was added with the exception of "- covering full costs for mitigation action and if that is not possible, hydropower plants have to be decommissioned." as this goes beyond the requirements of the WFD (eg state can subsidies if that is national policy).</p>
25	6	6.5	WWF CEE	<p>We recommend to add or emphasize the following key messages (in blue) in order to meet WFD requirements and implement the approach of the “Guiding Principles on Sustainable Hydropower Development in the Danube Basin” in the paragraphs on page 98/99:</p> <p>“Undoubtedly, hydropower will remain an important pillar of the Danube region’s renewable electricity portfolio. However, in relative terms its contribution to overall production is expected to fall due to the expected massive expansion of wind power and solar photovoltaic system while the impact on riverine ecosystems will remain an outstanding water management issue as mitigation measures are being implemented at varying speed and effectiveness across the Danube basin. Generally, the strategic need for additional hydropower development should be defined in an overall power system planning process (<i>detailed justification provided in document</i>).</p>	RBM	<p>The sentence was re-phrased by using "challenge" than issue, not to confuse with SWMI.</p>

26	6	6.5	WWF CEE	<p>As the DRBMP states well, the implementation of the “Guiding Principles on Sustainable Hydropower Development in the Danube Basin” is behind schedule. In order to achieve a considerable change, hydropower would require a drastic transformation of operation and approaches in order to play a role in sustainable energy supply. The DRBMP should state more clearly that new hydropower infrastructure in Danube countries should be avoided as there are renewable energy alternatives with lower negative impacts on ecosystems. Therefore, financial incentives such as subsidies for new hydropower development on rivers, big or small, have to be stopped. The hydropower sector needs to improve environmental performance by:</p> <ul style="list-style-type: none"> <li>- upgrading of existing hydropower plants both in terms of power generation and environmental mitigation (e.g. installing functioning fish passes (e.g. Iron Gates), habitat restoration) as well as removal of dams (esp. obsolete ones)</li> <li>- committing to biodiversity conservation objectives (e.g. action plans for migratory fish), sediment management, and environmental flows</li> <li>- covering full costs for mitigation action and if that is not possible, hydropower plants have to be decommissioned.</li> </ul> <p>Concerning inland waterway transport, the ongoing and planned navigation infrastructure projects made clear the formidable challenges of meeting navigation as well as WFD and nature conservation objectives but also the possibility of doing so if there is a strong will. This path has to be followed. If there are indications that previously built fairway infrastructure has negative environmental impact, mitigation measures must be planned and implemented. Missing waste treatment facilities for passenger ships and the impact of waves on fish are other challenges to be tackled as matter of priority (<i>detailed justification provided in document</i>).</p>	RBM	<p>The text was added with the exception of "- covering full costs for mitigation action and if that is not possible, hydropower plants have to be decommissioned." as this goes beyond the requirements of the WFD (eg state can subsidies if that is national policy).</p>
27	6	6.6, Agriculture chapter	WWF CEE	<p>6.6 Agriculture chapter and chapter on Nutrient pollution (8.1.2.3.), as well as 8.5 Financing PoM to add (in blue):</p> <p>The dialogue started between ICPDR and the agriculture sector is very welcome since this sector is among the key stakeholders in river basin management and floodplain/wetland restoration efforts. We therefore propose to highlight the role of this dialogue in overcoming obstacles to hydromorphological measures by adding the following measures to the provisions:</p> <p>In order to effectively engage and gain the support of the agricultural sector for change in land use or land use management necessary for floodplain/wetland restoration, the following incentives have to have been created:</p> <ul style="list-style-type: none"> <li>- opening CAP 1st pillar direct payments for water retention on arable lands</li> <li>- amending land use regulations to support water retention on agricultural lands.</li> <li>- including in CAP 2nd pillar WFD compensation schemes for restrictions on land use such</li> </ul>	PM	<p>The proposed points were added to the JPM Nutrient pollution part in the DRBMP Update 2021 (chapter 8).</p>

				as water drainage, time of seeding, or irrigation due to conservation measures ( <i>detailed justification provided in document</i> ).		
28	6	6.7, Pg. 99	MEASURES	Second paragraph, last sentence: instead "Threatened" to be written "Endangered" ( <i>detailed justification provided in document</i> ).	RBM	Sentence was re-phrased.
29	6	6.7, Pg. 100, table 30	MEASURES	Comment on word "Vulnerable": "New IUCN assessment published later in 2021 will classify it as endangered" ( <i>detailed justification provided in document</i> ).	RBM	Sentence was re-phrased.
30	6	6.7, Pg.101 (Creating ecological corridors: The MEASURES Project text box)	MEASURES	First paragraph: instead "May" to be written "July", instead "Aims" to be written "Aimed", instead "Identifies" to be written "Identified", instead "Assesses" to be written "Assessed", instead "Demonstrates" to be written "Demonstrated", instead "Will provide" to be written "Provides", instead "Is being" to be written "Was" ( <i>detailed justification provided in document</i> ).	RBM	Sentence was re-phrased.
31	6	6.7, Pg. 102	MEASURES	Comment on footnote 82: five species instead six; <i>Acipenser baerii</i> (non-native) - this is deleted ( <i>detailed justification provided in document</i> ).	RBM	Sentence was re-phrased.
32	6	6.7, Pg. 103, table 31	MEASURES	Comment on link from the first row: "link to the guidance document directly: <a href="https://dstf.info/wp-content/uploads/2021/06/DSTF-WSCS-Recommendations-for-Ex-Situ-Sturgeon-Conservation.pdf">https://dstf.info/wp-content/uploads/2021/06/DSTF-WSCS-Recommendations-for-Ex-Situ-Sturgeon-Conservation.pdf</a> " ( <i>detailed justification provided in document</i> ).	RBM	Sentence was re-phrased.
33	6	6.7, Pg. 104 (Ex-Situ Conservation Hatcheries Project Upper Danube text box)	MEASURES	First sentence of second paragraph is deleted plus there is comment: "Concepts for the establishment and operations of ex-situ breeding facilities in the Upper, Middle and Lower Danube have been developed. The high costs involved for such facilities require funding commitments from various co-funders, among which EU financial programmes will play a key role". Second sentence of second paragraph: instead "The proposal" it should be written "Methodology is based on LIFE Sterlet" ( <i>detailed justification provided in document</i> ).	RBM	Sentence was re-phrased.
34	6	6.7, Pg. 104 (LIFE 4 STURGEONS)	MEASURES	Instead title "LIFE 4 STURGEONS" it should be written "LIFE 4 Danube sturgeons" ( <i>detailed justification provided in document</i> ).	RBM	Sentence was re-phrased.

		project text box)				
35	6	6.7, Sturgeon Conservation, second box (Ex-Situ Conservation Hatcheries Project Upper Danube), pg. 104	MEASURES	We would like to propose adding to the chap. 6.7., Sturgeon Conservation, second box (Ex-Situ Conservation Hatcheries Project Upper Danube), on pag. 104: MEASURES a genetic conservation manual for ex-situ Danube sturgeon live gene stocks to assist the development of supportive restocking (MEASURES 2021c) and guidelines for ex-situ facilities have been developed ( <i>detailed justification provided in document</i> ).	RBM	Sentence was re-phrased.
36	6	6.7, Pg. 105 ( LIFE 4 STURGEONS project text box)	MEASURES	Second paragraph, second sentence is deleted and comment provided: "Official data from enforcement authorities (01/2016 to 12/2020) in Bulgaria, Romania and Ukraine revealed at least 214 cases of illegal activities targeting sturgeon (including poaching, use of illegal gear or illegal trade). A minimum of 602 sturgeon specimen were seized". Third, fourth and fifth sentence are deleted and comment provided: A market survey along the trade chain analysed 145 sturgeon meat & caviar samples from Bulgaria, Romania, Serbia and Ukraine. Isotope and genetic analysis proofed that 30% of all samples were sold illegally and 19% came from wild-caught sturgeons". insert footnote to publication: <a href="https://danube-sturgeons.org/wp-content/uploads/2021/04/Market-survey-final.pdf">https://danube-sturgeons.org/wp-content/uploads/2021/04/Market-survey-final.pdf</a>	RBM	Sentence was re-phrased.
37	6	6.7, Pg. 103	DSTF	DSTF misses a clear commitment to engaging actively in such cross-disciplinary dialogues towards sturgeon conservation and would suggest the following modified wording on p. 103: "Effective action therefore requires effective coordination of action between different territorial jurisdictions and the relevant international organisations and authorities. The ICPDR and the Contracting Parties are committed to playing a crucial role by maintaining dialogue and discussion with other key actors to ensure, as far as possible, that the necessary actions listed in Table 31 are taken. In this regard, follow up measures to the projects mentioned above should be considered as well as the organisation of a multisectoral conference for all stakeholders, including those from the Black Sea cooperation context, with the aim to assess gaps and discuss the need for further actions ( <i>detailed justification provided in document imput on sturgeon action</i> ).	HYMO, RBM	The text has been re-phrased in chapter 6.7 on Sturgeon Conservation.

38	6	6.5	WWF Adria	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 (detailed justification provided in document).	RBM	This aspect is beyond the mandate of the ICPDR and refers to the national level/national criteria and as such is subject to national strategies. An explicit reference to the Environmental Impact Assessments and Strategic Environmental Assessments are made in chapter 2.1.6.4 and 8.1.5.4 ("Future Infrastructure Projects") and chapter 6.3 ("River Basin Management and Nature Protection").
39	6	6.4	WWF Adria	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 (detailed justification provided in document).	RBM	This comment is welcomed and acknowledged, but does not require a revision in the DRBMP Update 2021. An explicit reference to the Environmental Impact Assessments and Strategic Environmental Assessments are made in chapter 2.1.6.4 and 8.1.5.4 ("Future Infrastructure Projects") and chapter 6.3 ("River Basin Management and Nature Protection"). .
40	8	8.1.2.3, Nutrient pollution	WWF CEE	6.6 Agriculture chapter and chapter on Nutrient pollution (8.1.2.3.), as well as 8.5 Financing PoM to add (in blue): The dialogue started between ICPDR and the agriculture sector is very welcome since this sector is among the key stakeholders in river basin management and floodplain/wetland restoration efforts. We therefore propose to highlight the role of this dialogue in overcoming obstacles to hydromorphological measures by adding the following measures to the provisions: In order to effectively engage and gain the support of the agricultural sector for change in land use or land use management necessary for floodplain/wetland restoration, the following incentives have to be created: - opening CAP 1st pillar direct payments for water retention on arable lands - amending land use regulations to support water retention on agricultural lands. - including in CAP 2nd pillar WFD compensation schemes for restrictions on land use such as water drainage, time of seeding, or irrigation due to conservation measures ( <i>detailed justificationj provided in document</i> ).	PM	The proposed points were added to the JPM Nutrient pollution part of the DRBMP Update 2021 (chapter 8).

41	8	8.1.5.1, Hydrological Alterations, hydropeaking	WWF CEE	WWF believes that not all significant hydropeaking cases have been detected judging from field observations and the disbalance of hydropeaking reported per country (e.g. no cases in RO, 27 in AT). We therefore urge countries to spend more efforts on monitoring hydropeaking of dams (e.g. Iron Gates) and designing mitigation measures where relevant ( <i>detailed justification provided in document</i> ).	HYMO	The "need for further investigations" is already included in in chapter 2.1.7 on "Gaps and Uncertainties of the Hydromorphological Alteration Assessment", and is additionally added in the chapter 8.1.5.1 on Hydrological Alterations, in the sub-chapter on vision and management objectives.
42	8	8.1.5.2	WWF Adria	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 suggested by the Plan as well ( <i>detailed justification provided in the document</i> ).	HYMO	Both aspects are being addressed in the respective sub-chapters on vision and management objectives of chapter 8.1.5.
43	8	8.1.5.2.1	WWF CEE	<p>As the JDS4 has shown, hydromorphological pressures on fish are apparent along the whole Danube and there is no general improvement since the last Plan. However, measures that are likely to improve the status of fish are largely limited to fish passes with various levels of ambition.</p> <p>Romania, to give one example, indicates as current status 116 river continuity interruptions while only 1 fish migration aid is planned. It is difficult to understand why the level of ambition is so low if e.g. Bulgaria aims for considerably more.</p> <p>We recommend countries to increase the number of measures for improving longitudinal connectivity in both Danube basin (chapter 8.1.5.2.1 Interruption of River Continuity for fish migration) and national plans and for the coming years as matter of priority. This entails the performance of restoration potential analyses on rivers, then preparation of a pipeline of implementation projects, including stakeholder involvements, for fish migration aids but also other measures, such as barrier removals (especially of obsolete dams).</p> <p>While sturgeon conservation is woven into several chapters of the plan - which we appreciate - we see the need to include identification, restoration and monitoring of habitats of migratory fish species, in particular sturgeons, in the chapter River Morphological Alterations and to commit to closer cooperation between water management authorities and authorities responsible for nature protection and biodiversity. As the integration chapter 6.4. on navigation concludes, the impact of vessels on fish fauna is likely to be considerable, judging from a pilot study on the</p>	HYMO, RBM	See response for comment 2/6/6 WWF-CEE (comment 20).



				Austrian Danube. The development of mitigation measures should therefore be included in the Joint Programme of Measures. <i>(detailed justification provided in document).</i>		
44	8	8.1.5.2.1, Interruption of River Continuity for Fish Migration (pg. 138)	<b>MEASURES</b>	<p>In order to further improve longitudinal connectivity, the assessment of barriers and to decrease their impact on the ecological corridor we recommend to add to chapter 8.1.5.2.1, Interruption of River Continuity for Fish Migration (pag. 138), section Management Objectives, the following bullet points:</p> <ul style="list-style-type: none"> <li>•Iron Gate dams as key obstacle for migration of fish from Lower Danube to Middle Danube and Gabčíkovo-dam as key obstacle for migration of fish from the Middle Danube to the Upper Danube Remain are top priorities in the Danube River Basin Management Plans for the period 2021 -2027.</li> <li>•Address other obstacles blocking access to habitats already identified as critical by MEASURES equally in the national (and where appropriate: International) river basin management plans</li> <li>•Explore opportunities for removal of barriers as a first choice</li> <li>•Allocate sufficient funds for remediation of these obstacles</li> <li>•Ensure that appropriate mechanisms are in place (such as periodical reporting in Annual meetings of ICPDR on progress) to avoid further delays in remediation</li> <li>•Allocate appropriate resources to ensure that ecological corridors in large rivers work well for upstream migration as well as for downstream migration, whereas several open questions still need clarification</li> <li>•Standardize and harmonize methodologies for assessment, implementation and function control of barrier / dam removal as well as for establishing passing solutions and communicate these methods among experts and cross-sectoral groups.</li> <li>•Ensure that fish-migration aids at bottlenecks of key importance for the entire Danube Basin (e.g. Iron Gates, Gabčíkovo...) as well as of high importance at the regional level are monitored (including continuous / automatic registration of migrating fish) to prove that fish migration aids work properly, that ecological corridors and measures taken (such as e.g. supporting stocking efforts) deliver and to get indications of populations of migratory fish in place.</li> <li>•For ecological prioritization of measures for river continuity restoration the creation of coherent stretches of ecological corridors should be taken into account, i.e. sections, which link important habitats and populations within the Danube as well as towards/within tributaries; linking Black Sea and Danube <i>(detailed justification provided in document).</i></li> </ul>	<b>HYMO, RBM</b>	Several additions, based on the proposals, made in chapter 8.1.5.2.1 on Interruption of River Continuity for Fish Migration (vision and management objectives). The importance of downstream migration was added.

45	8	8.1.5.2.1.1, Pg. 138	<b>MEASURES</b>	Text in this subchapter is marked in yellow with comment: "Shouldn't the MEASURES project be reflected here"??? ( <i>detailed justification provided in document</i> ).	<b>HYMO</b>	A reference to the MEASURES project has been added to chapter 8.1.5.2.1 on Interruption of River Continuity for Fish Migration.
46	8	8.1.5.2.1.1, Interruption of River Continuity for fish migration – Vision and management objectives	<b>WWF CEE</b>	<p>We recommend the following additional measures to include in chapter 8.1.5.2.1.1 Interruption of River Continuity for fish migration – Vision and management objectives (new wording with blue) :</p> <p>⇒ Engage with authorities responsible for energy and climate with the objective of phasing out financial support of schemes for hydropower coupling new permits and the upgrade of existing hydropower plants with investment in up to date environmental mitigation measures in line with WFD and nature conservation policies</p> <p>⇒ Construction of fish migration aids and other measures at existing migration barriers, as well as removing barriers to achieve/improve river continuity in the Danube River and in respective tributaries to ensure self-sustaining sturgeon populations and specified other migratory fish populations.</p> <p>⇒ Specification of number and locations of fish migration aids and other measures, including potential barriers for removal to achieve/improve river continuity that will be implemented by 2027 by each country.</p> <p>⇒ Standardize and harmonize methodologies for assessment, prioritization, implementation of barrier / dam removal as well as for establishing passing solutions. Also please see comment under maps (map 13) at the end of the document (<i>detailed justificationj provided in document</i>).</p>	<b>HYMO, RBM</b>	With the exception of the first bullet point (see response in line 54), all proposed changes have been included in chapter 8.1.5.2.1.1 on Interruption of River Continuity for fish migration.
47	8	8.1.5.2.2.2	<b>WWF CEE</b>	<p>We appreciate the knowledge base and recommendations the DTP Sediment project concluded and urge countries to allocate funds for preparation of respective measures and implementation.</p> <p>We urge countries to release a ban on sediment extraction from the Danube riverbed for commercial purposes (at least in river sections part of NATURA 2000 sites with fish/aquatic invertebrate species listed for protection). (<i>detailed justification provided in document</i>)</p>	<b>HYMO, RBM</b>	A reference to the need for setting criteria on significant pressure related to sediment (including sediment extraction will be addressed) was added in chapter 8.1.5.2.2 on Sediment Balance Alterations.

48	8	8.1.5.2.2.3	WWF CEE	<p>We appreciate the knowledge base and recommendations the DTP Sediment project concluded and urge countries to allocate funds for preparation of respective measures and implementation.</p> <p>We urge countries to release a ban on sediment extraction from the Danube riverbed for commercial purposes (at least in river sections part of NATURA 2000 sites with fish/aquatic invertebrate species listed for protection). <i>(detailed justification provided in document)</i></p>	HYMO, RBM	See response in line 45.
49	8	8.1.5.3.1	DSTF	<p>Specific measures for habitat or population restoration complementing the already included continuity measures, in line with vision and objectives, are missing completely DSTF therefore recommends including in chapter 8.1.5.3.1 “River Morphological Alterations” the following additional management objectives (in red italics below), in line with the very well formulated vision statement (The ICPDR’s basin-wide vision for morphological alterations is that rivers will be revitalized/ restored and maintained in a way, that aquatic species/populations are not negatively impacted, moreover, in a way that river restorations will support improvement of connection to groundwater bodies):</p> <p>Restoration/mitigation of river morphological alterations and habitats to ensure improvement of aquatic ecosystems and water status.</p> <ul style="list-style-type: none"> <li>- Specification of location and extent of measures for the improvement of river morphology that will be implemented by 2027 by each country.</li> <li>- Restoration of habitats of migratory fish species, in particular sturgeons.</li> <li>- Based on the results of MEASURES, complete the identification of habitats for migratory fish species and the assessment of their protection status to address the remaining gaps of a network of critical habitats and complete the map produced by the MEASURES project.</li> <li>- Assess habitat functionality by monitoring the migratory fish populations and their habitat use.</li> <li>- Establish working relations with authorities responsible for nature protection and biodiversity in Contracting Parties, who will be closely associated in achieving this mission <i>(detailed justification provided in document imput on sturgeon action).</i></li> </ul>	HYMO	Additional bullet points ("monitoring to monitor effects of measures", "identification of habitats") have been added to chapter 8.1.5.3.1 on River Morphological Alterations (vision and management objectives).

50	8	8.1.5.3.1, River Morphological Alterations (Pg. 146), section Management Objectives	<p><b>MEASURES</b></p> <p>To chapter 8.1.5.3.1, River Morphological Alterations (pag. 146), section Management Objectives, add the following bullet point</p> <ul style="list-style-type: none"> <li>• Ensure that habitats already identified by MEASURES as critical are protected with the set of legislation in place at the national as well at the international level (e.g. Natura 2000/FFH Directive; Nature Restoration Laws)</li> <li>• Complete the map produced by MEASURES of habitats for migratory fish species and their protection status</li> <li>• Ensure that management plans are in place for these habitats and they consider the needs of migratory fish</li> <li>• Allocate appropriate resources to continue identification of habitats of key importance for migratory fish and to monitor progress</li> <li>• Ensure that location and extent of measures foreseen for implementation by 2027 to improve river morphology by identification, protection or restoration of habitats are specified by each country</li> <li>• Establish working relations with authorities responsible for nature protection and biodiversity in Contracting parties to implement these measures</li> <li>• Extend working relations with the Black Sea Commission to successfully address the improvement of (long distance) migratory fish populations</li> <li>• Support regular monitoring of migratory fish populations and habitat status to detect changes and allow for effective management measures</li> <li>• Include monitoring of migratory fish into the scope of ICPDRs Transnational monitoring and devote a separate section of the “TMNM Yearbook” to migratory fish</li> <li>• Mandate a working group to design a Danube wide network of monitoring sites and a monitoring program tailored to migratory fish (building on monitoring of fish already in place to meet requirements of EU Water Framework Directive and Nature Conservation legislation) (<i>detailed justification provided in document</i>).</li> </ul>	HYMO, RBM	<p>Additional bullet points ("monitoring to monitor effects of measures", "identification of habitats") have been added to chapter 8.1.5.3.1 on River Morphological Alterations (vision and management objectives). Additional bullet points "• Establish working relations with authorities responsible for nature protection and biodiversity in Contracting parties to implement these measures and • Extend working relations with the Black Sea Commission to successfully address the improvement of (long distance) migratory fish populations" have been added in chapter 8.1.5.2.1 ("Interruption of River Continuity for Fish Migration").</p>
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51	8	8.1.5.3.1, River Morphologica l Alterations	<b>WWF CEE</b>	<p>We recommend to supplement the existing river continuity measures with the following key specific measures (with blue colour) for habitat or population restoration in line with vision and objectives ( chapter 8.1.5.3.1 “River Morphological Alterations”):</p> <ul style="list-style-type: none"> <li>⇒ Restoration/mitigation of river morphological alterations and habitats to ensure improvement of aquatic ecosystems and water status.</li> <li>⇒ Specification of location and extent of measures for the improvement of river morphology that will be implemented by 2027 by each country</li> <li>⇒ Restoration of habitats of migratory fish species, in particular sturgeons</li> <li>⇒ Based on the results of MEASURES, complete the identification of habitats for migratory fish species and the assessment of their protection status to address the remaining gaps of a network of critical habitats and complete the map produced by the MEASURES project.</li> <li>⇒ Assess habitat functionality by monitoring the migratory fish populations and their habitat use</li> <li>⇒ Establish working relations with authorities responsible for nature protection and biodiversity in Contracting Parties, who will be closely associated in achieving this mission</li> <li>⇒ strengthen working relations with the EUSDR Priority Area 1a and national inland waterway authorities to perform studies on the impact of waves on fish and agree on measures with the aim of developing a comprehensive set of measures for impact mitigation for the whole Danube and its tributaries</li> <li>⇒ extend necessary working relations in the Black Sea region to address the marine part of the life cycle of (anadromous) migratory fish species (<i>detailed justificationj provided in document</i>).</li> </ul>	<b>HYMO, RBM</b>	<p>Additional bullet points ("monitoring to monitor effects of measures", "identification of habitats") have been added to chapter 8.1.5.3.1 on River Morphological Alterations (vision and management objectives). An additional sentence was added on "further intensified cooperation between water management authorities and authorities responsible for nature protection and biodiversity" as well as "with the agricultural sector". Additional bullet points "• Establish working relations with authorities responsible for nature protection and biodiversity in Contracting parties to implement these measures and</p> <ul style="list-style-type: none"> <li>• Extend working relations with the Black Sea Commission to successfully address the improvement of (long distance) migratory fish populations” have been added in chapter 8.1.5.2.1 ("Interruption of River Continuity for Fish Migration").</li> </ul>
52	8	8.1.5.3.1.1, Pg. 146	<b>MEASURES</b>	<p>"Specification of location and extent of measured - it should be written measures for the improvement of river morphology that will be implemented by 2027 by each country" (<i>detailed justification provided in document</i>).</p>	<b>HYMO</b>	This was corrected.
53	8	8.1.5.3.2, Disconnection of Adjacent Wetlands/Flo odplains and Map 15	<b>WWF CEE</b>	<p>Disconnection of Adjacent Wetlands/Foodplains (chapter 8.1.5.3.2.) and Map 15-reconnection potential: The threshold of 500 ha seems too large on this map and as a result the map shows almost no reconnection potential. Due to that, map 15 is not in harmony with the chapter 6.1, 6.2, 6.3 of the draft FRMP2, since these chapters communicate significant NWRM potential and the message that countries as matter of priority are to apply NWRM wherever possible. This statement isn't confirmed by map15, if the 500 ha threshold is not decreased. We suggest to include in the workplan of ICPDR HYMO EG to reconsider this problem and adjust messages and measures (in favour of larger NWRM ambitions) (<i>detailed justification provided in document</i>).</p>	<b>HYMO, FP</b>	<p>The importance of NWRM as well as a link to the Danube Floodplain Project results have been added to chapter 8.1.5.3.2 on Disconnection of Adjacent Wetlands/Floodplains.</p>
54	8	8.1.5.3.2 , Disconnection	<b>WWF CEE</b>	<p>In the chapter on Disconnection of Adjacent Wetlands/Floodplains (chapter 8.1.5.3.2.) several countries indicated low ambition regarding restoration, although the potential for</p>	<b>HYMO</b>	<p>The chapter 8.1.5.3.2 on Disconnection of Adjacent Wetlands/Floodplains, including its sub-chapter on</p>

		<p>of Adjacent Wetlands/Floodplains</p>	<p>reconnection of floodplains is much higher. The plan should indicate the objective of preparing a pipeline of projects for implementation and creating (at national level) the right enabling conditions (financial, legal, capacity):</p> <ul style="list-style-type: none"> <li>- Hungary indicates only 552 ha for Wetlands/floodplains with reconnection potential 2021 with the job already finished. Nothing is planned for 2027. In the DTP Danube Floodplain project Hungary stated 71.220 ha (712,2 km2) wetlands/floodplains with reconnection potential. We expect these areas will be included in the final plan.</li> <li>- HU Danube (name/potential floodplains and km2) : Total of 395,6 km2: Szigetköz 157,1 km2, Paks 22,1km2, Veránka-island 161,7km2, Béda-Karapanca 54,7km2</li> <li>- HU Tisza (name/potential floodplains and km2) : Total of 316,6 km2: Milota 20,9km2, Tiszadob 39,4km2, Tiszadorogma 31,1km2, Pély 36,2km2, Nagykörű-Szajol 40km2, Szolnok Tiszaug 91,4km2, Lakitelek-Csongrád 57,6km2</li> <li>- Romania stated 21,543 ha wetlands/floodplains with reconnection potential 2021, and 2,650 ha wetlands/floodplains totally reconnected by 2027. We are aware of the intention to include the DTP Danube Floodplain project results into the final DRBMP, but would like to highlight here that the 3rd Romanian draft RBM already includes 100.000 ha as potential where the key areas, larger than 500 ha are: Desa 8276 ha , Bistret-Bechet 27972 ha, Bechet-Tumu Magulere 30972 ha, Trainan – Zimnicea 20450 ha, Nastuleru 3169 ha, Borcea Buliga 858 ha, Garliciu 1083 ha, Tichilesti 31808 ha.</li> <li>- We see low restoration ambition also in case of Slovakia. 5,117 ha Wetlands/floodplains with reconnection potential 2021, and only 7 ha (!) wetlands/floodplains totally reconnected by 2027, extension of deadline (article 4.4) on 5,110 ha.</li> <li>- We recommend allocating funds and capacity to develop restoration potential analyses on rivers and prepare a pipeline of projects ready for implementation. EU Structural or Recovery and Resilience Funds, CAP and other sources are available for this purpose.</li> <li>- Bulgaria didn't outline any areas with restoration potential and planned measures in the draft 3rd DRBMP. However, there are wetlands included in the National action plan for Conservation of Wetlands of High Significance in Bulgaria 2013-2022 in particular Mechka fishponds (570ha) and one just below the threshold of 500 ha (Orsoya fishponds, 475 ha). Wetlands already reconnected with Danube river but in need of additional measures for improvement of the hydrological regime according to the National action plan for Conservation of Wetlands of High Significance in Bulgaria 2013-2022 (note: in the Action plan higher ha figures are given as they include not only the wetland itself but also other territories included in the corresponding protected site/area).</li> </ul> <p>Belene Island (Persina) Wetlands - 2200 ha          Kalimok - Brrushlen wetlands - 2000 ha          Srebarna Lake - 900 ha</p> <ul style="list-style-type: none"> <li>- In Ukraine, 43,556 ha are stated as Wetlands/floodplains with reconnection potential</li> </ul>	<p>vision and management objectives, has been complemented. As for the responses from Danube countries the following shall be considered: <b>BG:</b> "a) With regards to Mechka and Orsoya fishponds, as far as we know both are under the criteria of &gt;500 ha, respectively 445ha and 475 ha. This was the reason not to include them in the category wetlands/floodplains with reconnection potential. Other listed in the comment wetlands/floodplains are already connected to the Danube. b) For Belene islands a project has been launched in recent years, to restore the island's natural water balance. Belene islands is designated as a protected area (BG 0002017) under the Birds Directive and also it's in the territory of Persina Nature park. c) With regards to Kalimok-Brashlen wetland, there was a big project for reconnection of this area to the Danube, in the time frame of the first Management plan. Since then this wetland is reconnected and it's also designated as a protected area under the Habitats Directive (BG 0000377). d) Srebarna lake is also reconnected to the Danube and there is a planned project for improving the hydrological balance. The lake is protected area under the Habitats and Birds Directives (BG0000241), but it's also the only natural lake on the Bulgarian Danube river region. e) Belene islands, Kalimok-Brashlen and Srebarna lake are also listed in the Annex 11 Inventory of the protected areas. <b>HU:</b> The Danube Floodplain project is still ongoing. It lists several areas with reconnection potential on the Danube and Tisza which may be added via a link to the DRBMP. <b>SK:</b> Slovakia has updated the reported data for RBMP2021 and in total 7187 ha of wetlands/floodplains reconnection potential (areas larger than 500 ha) has been identified and no exemptions (4.4) are reported – the measures should be done by 2027.</p>
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				<p>2021, but with “No measures yet indicated” while the need for floodplain reconnection was clearly highlighted in the "Yearly Report 2020 of Law Danube Basin Water Management Authority". According to WWF’s discussions with key governmental experts, a minimum of 10% of this could and should be reconnected within the next WFD cycle. In line with our highlights at the beginning of our statement regarding restoration, we recommend the following additional measures (with blue colour) to be specified under chapter Disconnection of Adjacent Wetlands/Floodplains (chapter 8.1.5.3.2.):</p> <p>The following management objectives will be implemented by 2027 as steps towards the vision:</p> <p>EU Member States, Candidate Countries and Non-EU Member States:</p> <p>⇒ For the DRBMP Update 2021, efforts will be continued and further measures will be identified for the conservation and restoration of existing and the restoration of former (potential) wetlands/floodplains with reconnection potential to ensure biodiversity, the good status in the connected river, flood protection, drought mitigation and pollution reduction. Beneficial effects are expected to be manifold, including improvements like the provision of fish habitats for spawning, nursery and feeding.</p> <p>⇒ Specification of number, locations and area of wetlands/floodplains that will be reconnected and restored by 2027 by each country based on restoration potential analyses making best use of the EU funded Danube Floodplain project results (see below) and other available analyses prepared in the 2nd cycle.</p> <p>⇒ Development of a pipeline of projects with applications for funding</p> <p>⇒ e.g. from the National Recovery and Resilience budgets, the Operational Programmes and Common Agricultural Policy funding shaped to more effectively support the Programmes of Measures</p> <p>⇒ engagement with agricultural policy makers towards amendment of land use regulations (where necessary) to support water retention on agricultural lands (<i>detailed justification provided in document</i>).</p>		
55	8	8.1.5.3.2.3, Summary of Measures of Basin-Wide Importance (pg. 149).	WWF CEE	<p>„The inter-linkage with national RBM Plans is vital for wetlands/floodplains reconnection as significant areas are expected to be reconnected also to rivers with catchment areas &lt;4,000 km<sup>2</sup> and with surface areas &lt;500 ha having also positive effects on the water status and habitats of larger rivers.” (8.1.5.3.2.3 Summary of Measures of Basin-Wide Importance, page 149).</p> <p>Referring to this note, due to the cumulative effect, we recommend to indicate in the Danube basin plan also the cumulative figure of areas under 500 ha/country. Otherwise the level of restoration ambition of countries cannot be properly evaluated. (<i>detailed justification provided in document</i>).</p>	HYMO	The criterion < 500 ha is already considered within the analysis of reported data in the DRBMP Update 2021. Also the importance of restoration of smaller floodplains is highlighted within the DRBMP Update 2021.

56	8	8.1.5.4.1 , Future Infrastructure Projects – Vision and management objectives	WWF CEE	We recommend the following additional measures to include in chapter 8.1.5.4.1 Future Infrastructure Projects – Vision and management objectives: ⇒ Engage with authorities responsible for energy and climate with the objective of phasing out financial support schemes for hydropower ( <i>detailed justification provided in document</i> ).	RBM, HYMO	Following the discussions in the ECON TG (and confirmed in the HYMO TG), this aspect is beyond the mandate of the ICPDR, as the financial aspect of the comment refers to the national level/national criteria and is subject to national strategies.
57	8	8.5, Financing PoM	WWF CEE	6.6 Agriculture chapter and chapter on Nutrient pollution (8.1.2.3.), as well as 8.5 Financing PoM to add (in blue): The dialogue started between ICPDR and the agriculture sector is very welcome since this sector is among the key stakeholders in river basin management and floodplain/wetland restoration efforts. We therefore propose to highlight the role of this dialogue in overcoming obstacles to hydromorphological measures by adding the following measures to the provisions: In order to effectively engage and gain the support of the agricultural sector for change in land use or land use management necessary for floodplain/wetland restoration, the following incentives have to have be created: - opening CAP 1st pillar direct payments for water retention on arable lands - amending land use regulations to support water retention on agricultural lands. - including in CAP 2nd pillar WFD compensation schemes for restrictions on land use such as water drainage, time of seeding, or irrigation due to conservation measures ( <i>detailed justificationj provided in document</i> ).	ECON	A paragraph based on this comment was added in chapter 8.5 ("Financing the Joint Programme of Measures").
58	8	8.5, Financing the Joint Programme of Measures (pg. 164)	WWF CEE	<ul style="list-style-type: none"> <li>- In the table on financing instruments for EU countries, add under Hydromorphological Alterations for both "Interruption of river continuity and hydromorphological alterations" and "Reconnection of wetlands/floodplains" the instrument NextGenerationEU</li> <li>- correct in the list of main EU funds eligible for different elements of floodplain and wetland restoration: "For field work: European Regional Development Fund, EARDF, and LIFE+.</li> <li>- add as bullet point to the paragraph starting with "Furthermore, several additional instruments/organization exist that are potentially relevant for acquiring financing in the context of WFD implementation for all pressures in the DRB" <ul style="list-style-type: none"> <li>■ CAP Pillar 1 direct payments for water retention on arable land to provide incentives for wetland restoration</li> <li>■ inclusion of WFD compensation schemes in the CAP Pillar 2 for restrictions on land use</li> </ul> </li> </ul>	ECON	<p>Ad 1: A general reference to NextGenerationEU is already included in chapter 8.5 ("Financing the Joint Programme of Measures"). It was decided not to add this instruments specifically for "Hydromorphological Alterations" in the financing table since it can and should be used for many of the SWIMs.</p> <p>Ad 2: This was corrected.</p> <p>Ad 3: CAP payments as an instrument are already covered in chapter 8.5/table 61, but not at this level of detail. Nevertheless, the paragraph on additional instruments/organisations that are potentially relevant is moved further up/right under the table 57 in order to increase clarity about this aspect.</p>



				such as water drainage, time of seeding, or irrigation due to conservation measures ( <i>detailed justification provided in document</i> ).		
59	8	8.1.5.3	WWF Adria	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 ( <i>detailed justification provided in document</i> ).	HYMO, RBM, PM, FP, ECON	Additional references to nature based solutions were included in chapters 2.1.6.4 on Future Infrastructure Projects and 8.1.5.3.2 on Disconnection of Adjacent Wetlands/Floodplains. This point was also included into a new paragraph in chapter 8.5 ("Financing the Joint Programme of Measures"). Measures under nutrient pollution and the Guidance document on sustainable agriculture also address this issue.
60	Annex	Annex 7 List of Future Infrastructure Projects, pg. 3, Water Body: Donau von Einmündung Große Laber bis Einmündung Isar	WSV	<b>Zitat:</b> Ausbau der Wasserstraße und Verbesserung des Hochwasserschutzes zwischen Straubing und Vilshofen, Teilabschnitt 1: Straubing und Deggendorf <b>Änderung:</b> Ausbau der Wasserstraße und Verbesserung des Hochwasserschutzes zwischen Straubing und Vilshofen, Teilabschnitt 1: Straubing bis Deggendorf <b>Begründung:</b> Korrekte Bezeichnung Projekt ( <i>detailed justification provided in document</i> ).	HYMO	Annex 7 of the DRBMP Update 2021 is updated accordingly.
61	Annex	Annex 7 List of Future Infrastructure Projects, pg. 3, Water Body: Donau von Einmündung Große Laber bis Einmündung Isar	WSV	<b>Zitat:</b> Main purpose: Flood protection <b>Änderung:</b> Main purpose: Flood protection, Navigation <b>Begründung:</b> Beide Vorhaben (Ausbau der Wasserstraße und Verbesserung des Hochwasserschutzes) in einem gemeinsamen Verfahren ( <i>detailed justification provided in document</i> ).	HYMO	Footnote from map 17 (Future infrastructure projects can have multiple purposes, e.g. the main purpose of the project "Straubing-Vilshofen" in Germany is twofold: improvement of flood protection, and navigation.) will be copied in Annex 7, because only one main purpose can be mentioned in the relevant column in Annex 7 of the DRBMP Update 2021.

62	Annex	Annex 7 List of Future Infrastructure Projects, pg. 3, Water Body: Donau von Einmündung Große Laber bis Einmündung Isar	WSV	<p><b>Zitat:</b> Description: reduction flood risks, improvement for navigation (Ongoing approval procedure un-der public law and current measures improving flood protection)</p> <p><b>Änderung:</b> Description: Improvement of flood protection (technical measures for 100-year flood events), Improvement of navigation conditions (River engineering works - stream regulation) (<i>detailed justification provided in document</i>).</p>	HYMO	Annex 7 of the DRBMP Update 2021 is updated accordingly.
63	Annex	Annex 7 List of Future Infrastructure Projects, pg. 3, Water Body: Donau von Einmündung Große Laber bis Einmündung Isar	WSV	<p><b>Zitat:</b> Project status: Officially planned</p> <p><b>Änderung:</b> Project status: Implementation of project (<i>detailed justification provided in document</i>).</p>	HYMO	Annex 7 of the DRBMP Update 2021 is updated accordingly.
64	Annex	Annex 7 List of Future Infrastructure Projects, pg. 3, Water Body: Donau von Einmündung Große Laber bis Einmündung Isar	WSV	<p><b>Zitat:</b> Start implementation: not yet determined</p> <p><b>Änderung:</b> Start implementation: 2020 (<i>detailed justification provided in document</i>).</p>	HYMO	Annex 7 of the DRBMP Update 2021 is updated accordingly.

65	Annex	Annex 7 List of Future Infrastructure Projects, pg. 3, Water Body: Donau von Einmündung Große Laber bis Einmündung Isar	WSV	<p><b>Zitat:</b> EIA: Intended</p> <p><b>Änderung:</b> EIA: Already done</p> <p><b>Begründung:</b> UVP wurde im Rahmen des Planfeststellungsverfahrens durchgeführt (<i>detailed justification is provided in document</i>).</p>	HYMO	Annex 7 of the DRBMP Update 2021 is updated accordingly.
66	Annex	Annex 7 List of Future Infrastructure Projects, pg. 4, Water Body: Donau von Einmündung Isar bis Einmündung Vils	WSV	<p><b>Zitat:</b> Ausbau der Wasserstraße und Verbesserung des Hochwasserschutzes zwischen Straubing und Vilshofen, Teilabschnitt 2: Deggendorf und Vilshofen</p> <p><b>Änderung:</b> Änderung: Ausbau der Wasserstraße und Verbesserung des Hochwasserschutzes zwischen Straubing und Vilshofen, Teilabschnitt 2: Deggendorf bis Vilshofen</p> <p><b>Begründung:</b> Korrekte Bezeichnung Projekt (<i>direct justification provided in document</i>).</p>	HYMO	Annex 7 of the DRBMP Update 2021 is updated accordingly.
67	Annex	Annex 7 List of Future Infrastructure Projects, pg. 4, Water Body: Donau von Einmündung Isar bis Einmündung Vils	WSV	<p><b>Zitat:</b> Main purpose: Flood protection</p> <p><b>Änderung:</b> Main purpose: Flood protection, Navigation</p> <p><b>Begründung:</b> Beide Vorhaben (Ausbau der Wasserstraße und Verbesserung des Hochwasserschutzes) in einem gemeinsamen Verfahren (<i>detailed justification provided in document</i>).</p>	HYMO	Footnote from map 17 (Future infrastructure projects can have multiple purposes, e.g. the main purpose of the project “Straubing-Vilshofen” in Germany is twofold: improvement of flood protection, and navigation.) will be copied in Annex 7, because only one main purpose can be mentioned in the relevant column in Annex 7 of the DRBMP Update 2021.
68	Annex	Annex 7 List of Future Infrastructure	WSV	<p><b>Zitat:</b> Description: reduction flood risks, improvement for navigation (Ongoing approval procedure un-der public law and current measures improving flood protection)</p> <p><b>Änderung:</b> Description: Improvement of flood protection (technical measures for 100-</p>	HYMO	Annex 7 of the DRBMP Update 2021 is updated accordingly.

		Projects, pg. 4, Water Body: Donau von Einmündung Isar bis Einmündung Vils		year flood events), Improvement of navigation conditions (River engineering works - stream regulation) ( <i>detailed justification provided in document</i> ).		
69	Annex	Annex 7 List of Future Infrastructure Projects, pg. 4, Water Body: Donau von Einmündung Isar bis Einmündung Vils	WSV	<b>Zitat:</b> Project status: Planning under preparation <b>Änderung:</b> Ongoing planning approval process (currently: hearing procedure, public participation) ( <i>detailed justification provided in document</i> ).	HYMO	"Planning under preparation" stays, because no free text possible in the relevant column of Annex 7. Approval procedure is not finalized yet.
70	Annex	Annex 7 List of Future Infrastructure Projects, pg. 4, Water Body: Donau von Einmündung Isar bis Einmündung Vils	WSV	<b>Zitat:</b> Transboundary impact: No <b>Änderung:</b> Yes <b>Begründung:</b> Participation Republic of Austria (Espoo-Convention) ( <i>detailed justification provided in document</i> ).	HYMO	Annex 7 of the DRBMP Update 2021 is updated accordingly.
71	Annex	Annex 7 List of Future Infrastructure Projects, pg. 4, Water Body: Donau von	WSV	<b>Zitat:</b> EIA: Intended <b>Änderung:</b> EIA: In process <b>Begründung:</b> UVP/UVU wird im Rahmen des Planfeststellungsverfahrens durchgeführt ( <i>detailed justification provided in document</i> ).	HYMO	"Intended" is replaced by "already done", one of the available text options in the relevant column of Annex 7.

		Einmündung Isar bis Einmündung Vils				
72	Annex	Annex 15 Progress on measures addressing hydromorphological alterations, Table 4: Interruptions of river and habitat continuity	WSV	<p><b>Zitat:</b> DE: Number of measures to be implemented by 2021: 22; not started: 0, Planning on-going: 14; construction on-going: 0</p> <p><b>Anmerkung:</b> Die Staustufen Geisling, Kelheim und Riedenburg sind mindestens 3 Maßnahmen, die bis 2027 nicht als laufende Planungen angezeigt werden (not started: 3) (<i>detailed justification provided in document</i>).</p>	HYMO	Continuity interruptions Geislingen, Kelheim and Riedenburg (as well as Karchlet, Dietfurt, Straubing, Regensburg, Bad Abbach) were not reported to be implemented within the 2nd management cycle (2016 - 2021) and are thus not addressed in Annex 15; measures that will be implemented between 2022 and 2027 or after 2027 are addressed in the Joint Program of Measures - for continuity interruptions in chapter 8.1.5.2; in table 53 for Germany the number of measures in rivers of basin-wide importance that will not be implemented until 2027 is given with "5" (corresponding to the national list of WSV)
73	General		IAD	To urgently establish a Freshwater Biodiversity Task Group within the ICPDR to harmonize integration of water and nature directives with legal and financial opportunities provided by the new planning cycle ( <i>detailed justification provided in document</i> ).	RBM	In view of ICPDR countries a new separate group cannot efficiently contribute to better integration, it is better to make efforts to deal with the relevant issues within the existing groups and in close cooperation with EUSDR PA6.
74	General		IAD	To explore the possibility to use the new funding opportunities for restoring critically endangered aquatic species and habitats, establishing new ecological corridors and protected areas, and improving their protection status ( <i>detailed justification provided in document</i> ).	ECON	The point on restoring aquatic habitats was added to the new paragraph in chapter 8.5 ("Financing the Joint Programme of Measures").
75	General		IAD	To foresee an adaptive management and gradually include the new measures addressing biodiversity integration into the DRBMP in the up-coming years, in order not to lose another six years for nature conservation ( <i>detailed justification provided in document</i> ).	RBM	This comment is welcomed and acknowledged, but does not require a revision in the DRBMP Update 2021.
76	General		IAD	To urgently launch coordinated research activities on aquatic biodiversity status in the Danube River Basin and possibility to declare freshwater biodiversity a Significant Water Management Issue (SWMI) in the Danube Basin ( <i>detailed justification provided in document</i> ).	MA	MA EG will address this issue in its Work Programme 2022-24.

77	General		<b>DSTF</b>	<p>In view of the intersectoral nature of these issues, a strong political commitment from the responsible Ministers at the 2022 ICPDR Ministerial Meeting will be very important, in particular with regard to intensified cooperation between key players engaged in water management of Danube and the Black Sea Basins responsible for nature conservation, fisheries, navigation, hydropower or enforcement.</p> <p>In this context, DSTF strongly welcomes that the Romanian 2022 ICPDR Presidency is considering taking the lead in organizing a conference for all stakeholders which will discuss the need for action to restore and conserve the Danube sturgeons in the Danube and Black Sea Basins (<i>detailed justification provided in document DSTF replay to ICPDR Public Consultation</i>).</p>	<b>RBM</b>	This comment is welcomed and acknowledged, but does not require a revision in the DRBMP Update 2021.
78	General		<b>EBU/ESO/IWT</b>	<p>The IWT sector aims to be properly represented in future discussions on climate change-related policies, strategies and measures, including on water quantity management (including water scarcity/drought and water allocation). The IWT sector also appreciates the recognition that integration with other sector policies is an important issue in the Danube River Basin in order to create synergies and avoid potential conflicts. The IWT sector looks forward to continued engagement and further intensified exchanges, including in the context of the Joint Statement, to ensure that water resource management on the Danube supports sustainable water uses such as navigation while at the same time protecting and enhancing the water environment. It stresses the importance of full engagement with the inland navigation sector in the development and delivery of appropriate measures in the elaboration of the new RBMPs. (<i>detailed justification provided in document EBU/ESO/IWT replay to ICPDR Public Consultation</i>).</p>	<b>RBM</b>	This comment is welcomed and acknowledged, but does not require a revision in the DRBMP Update 2021.
79	General		<b>EUSDR PA6</b>	<p>Inland navigation causes almost one and a half times the greenhouse gas load of railways. Key messages</p> <ul style="list-style-type: none"> <li>• There are big differences in the GHG efficiency of motorised transport modes in Europe and, consequently, their contributions to global warming. This confirms the importance of shifting transport to the most efficient modes.</li> <li>• Rail and waterborne transport are much more GHG efficient than road transport and aviation, both for passengers and for freight.</li> <li>• While the efficiency of rail transport and aviation improved markedly during the 5-year period covered by the study, the efficiency of other modes appears to have stagnated or even declined.</li> <li>• Geography, distance, journeys that are time critical and the need for door-to-door mobility set limits on the shift from one transport mode to another. Hence, improving the GHG efficiency of all modes of transport remains vital (<i>detailed justification provided in document</i>).</li> </ul>	<b>RBM</b>	This comment is welcomed and acknowledged, but does not require a revision in the DRBMP Update 2021.

80	General		IAD	To enhance the dialogue between water/biodiversity experts at national level and identify the best measures to maintain the hydromorphological integrity of free-flowing river sectors and lakes and support aquatic biodiversity restoration, to be included in the RBMPs ( <i>detailed justification provided in document</i> ).	HYMO	The importance of "free-flowing river sections" was added to chapter 8.1.5.2.1 on Interruption of River Continuity for Fish Migration (under vision and management objective).
81	General		DSTF	DSTF also recommends including in the workplan of respective ICPDR Working and Task Groups for the period 2022-2027 analyses of data resulting from the measures listed above (identification of habitats for migratory fish species, monitoring, protection status) with involvement of nature conservation departments and making the identification and monitoring of activities towards a functioning network of critical sturgeon habitats a priority ( <i>detailed justification provided in document Input on sturgeon action</i> ).	HYMO, MA, RBM	A reference to the identification of important habitats for migratory fish species and the assessment of their protection status was added to the chapter 8.1.5.3.1 on River Morphological Alterations (vision and management objectives).
82	General		GWP HU	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 ( <i>detailed justification provided in document</i> ).	RBM, FP	Already included in the DRBMP Update 2021.
83	General		GWP HU	Climate change and extreme hydrological issues on water status, by way of joint projects, guidelines, catalogues of measures, exchange of experience, etc. ( <i>detailed justification provided in document</i> ).	RBM	Already included in the DRBMP Update 2021.
84	General		GWP HU	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 ( <i>detailed justification provided in document</i> ).	MA	Joint Danube Surveys have the ambition to determine the chemical contamination of waters more precisely, in order to define contaminant-specific action programs, with special regard to micro- and macro plastic contaminants and pharmaceutical issues
85	General		GWP HU	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. ( <i>detailed justification provided in document</i> ).	RBM	Already included in the DRBMP Update 2021.
86	General		GWP HU	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 ( <i>detailed justification provided in document</i> ).	RBM	Already included in the DRBMP Update 2021.

87	General		GWP HU	<p>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 (<i>detailed justification provided in document</i>).</p>	PP	<p>As is outlined in Chapter 9, the ICPDR's communication and outreach already includes activities and aims to raise awareness (Danube Day, social media, etc.) and has taken a decentralising path enabling members to freely organise and adapt events as they wish (along the theme chosen by the PP EG annually). Cooperation with other projects is always possible, and our local partners are open for suggestions. While the comment is highly appreciated, no further treatment or addition based on this comment is necessary.</p>
88	General		WWF CEE	<p>We believe that the need and potential for river and wetland restoration is much higher than what is in the Plan.</p> <p>It is clear to us that many small scale projects may not appear in this Danube basin level plan that together might have certain impact, but believe, more larger scale projects and an implementation push are possible and necessary if the following will happen:</p> <ol style="list-style-type: none"> <li>1. focus on integrated solutions that solve several problems at the same time such as flood management, drought mitigation, water quality improvement or biodiversity objectives with a longer term perspective.</li> <li>2. overcome the blockage by the agricultural sector by providing the right incentives. This entails in particular the opening of CAP Pillar 1 direct payments for water retention on arable land and amendment of land use regulations to support water retention on agricultural lands, as well as inclusion of WFD compensation schemes in the CAP Pillar 2 for restrictions of certain land use such as water drainage, time of seeding, or irrigation due to conservation measures.</li> <li>3. Building capacity in authorities for planning and implementing restoration and conservation measures together with key sector representatives, such as agriculture, flood mitigation, nature conservation, forestry.</li> <li>4. Preparing a pipeline of projects including feasibility studies, stakeholder engagement, and agreements with land-owners, technical design and permits and funding allocation.</li> <li>5. Allocating financial resources e.g. from the National Recovery and Operational Programmes and Common Agricultural Policy funding lines to the Programmes of Measures (<i>detailed justification provided in document</i>).</li> </ol>	RBM, ECON, HYMO, PM, FP	<p>Several aspects of this comment are included in chapter 8.1.5.3.2 on Disconnection of Adjacent Wetlands/Floodplains. Additionally, an additional sentence was added on "further intensified cooperation between water management authorities and authorities responsible for nature protection and biodiversity" as well as "with the agricultural sector" in chapter 8.1.5.3.1 on River Morphological Alterations (vision and management objectives). As for bullets 2 to 5 they have been added into a new paragraph in chapter 8.5 ("Financing the Joint Programm of Measures"). Measures under nutrient pollution and the Guidance document on sustainable agriculture also address this issue. The aspect "facilitating the implementation of larger scale projects" was added in chapter 8.1.2 (nutrient pollution).</p>



89	General		GWP HU	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) <i>(detailed justification provided in document)</i> .	MA, HYMO	The need for a harmonisation of methods has been added to all relevant sub-chapters of chapter 8.1.5, including chapter 8.1.5.1 on Hydrological Alterations and chapters 8.1.5.3.1 on Morphological alteration as well as 8.1.5.3.2 on Disconnection of Adjacent Wetlands/Floodplains. Most of the BQE methods for the ecological status assessment have been intercalibrated. MAEG is dealing with the existing gaps. No adding of text is needed.
90	Map	Map 13, river continuity	WWF CEE	We would like to ask for justification for the data points in the map showing dams passable for fish. According to our knowledge or field observations, some of them are questionable. The existence of a fish pass doesn't automatically mean it is functioning and passable for fish. For example the 3 dams on the Drava near to the confluence with Mura have fish passes not designed for the fish species living in the Drava. Also based on field observation, the Dubrava dam doesn't ensure water in the fish passes throughout the year. In Romania, on the Olt, several dams are indicated on the map as not passable for fish, but GES/GEP achieved. We are wondering how this can be <i>(detailed justificationj provided in document)</i> .	HYMO	A reference to the "standardization and harmonization of methodologies", including methods for assessment of fish pass effectiveness, has been added to chapter 8.1.5.2.1 on Interruption of River Continuity for Fish Migration (vision and management objectives).
91	Map	Map 13, river continuity	WWF Adria	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 <i>(detailed justification provided in document)</i> .	HYMO	See response to comment 7/9/Map (comment 91).
92	Map	Map 14, alteration of river morphology	WWF CEE	We suggest adding a measure to update and/or harmonise methodologies for defining morphological conditions on joint (transboundary) river stretches which flow along borders. The classification of morphological conditions is the same on the SK-HU Danube between Gönyű-Szob, on the RO-BG Danube stretch or on the SK-HU Ipoly. But they are different on the SK-HU Danube upstream Gönyű, or the HR-HU Drava. The difference between the categorization is quite significant on the HR-HU Drava (class4-5 in Croatian and class 1 in Hungary). This raises several questions about the methodology and it is hard to evaluate which category reflects the real water body status <i>(detailed justificationj provided in document)</i> .	HYMO	The need for a harmonisation of methods has been added to all relevant sub-chapters of chapter 8.1.5, including a reference to "further harmonisation and upgrading of methods for assessing river morphology (mainly on transboundary water bodies)" in chapter 8.1.5.3.1 on River Morphological Alterations.

93	Map	Map 14, alteration of river morphology	WWF Adria	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) ( <i>detailed justification provided in document</i> ).	HYMO	See response to comment 8/9/Map (comment 93).
94	Map	Maps 34, 35, 36, 37, 38, 39	WWF CEE	These maps show the expected improvements of hydromorphological alterations. We don't find either in the main text of the plan, nor in the list of main measures how these predicted improvements will come about. We recommend making this an item of the upcoming work plan and data collection template of the HYMO TG for higher transparency, knowledge sharing and joint learning among the countries ( <i>detailed justificationj provided in document</i> ).	HYMO	A reference to the "preparation of an upgraded overview on implemented measures related to river restoration" is added to several sub-chapters of chapter 8.1.5, including chapter 8.1.5.1 on Hydrological alteration, 8.1.5.2.1 on Interruption of River Continuity for Fish Migration, chapter 8.1.5.3 on Morphological Alterations and chapter 8.1.5.3.2 on Disconnection of Adjacent Wetlands/Floodplains.

## 2.2 Danube River Basin Management Plan Update 2021 – Stakeholder Workshop

Nr.	TA	Ch.	Comment	Relevant EG	Treatment of the comment
1	1 (Pollution)	General	Global source-to-sea: more engagement with global initiatives that link source to sea management	PM	Basin-wide nutrient and hazardous substances emissions are assessed in the plan, including the aspect of Black Sea pollution. Basin-wide measures are proposed to reduce pollution of the Danube and the Black Sea. The ICPDR submitted a voluntary commitment to the 2017 UN Ocean Conference to support the implementation of the UN SDG14.
2	1 (Pollution)	General	Translate information to the public: investigative pilot projects, “translating” information	PP	Addition of the phrase 'as up-to-date, effective and accessible as possible to the broadest audience' to the enumeration list of the public participation activities the ICPDR is engaged in subchapter 9.4.1.
3	1 (Pollution)	General	Align management and monitoring instruments: e.g. better links and harmonization between policies (Water Framework Directive, Drinking Water Directive, Urban Wastewater Treatment Directive, Common Agricultural Policy)	PM, RBM	Examples are mentioned in the plan, e.g. aligning agriculture and water management, mining sector and water management, coherence between UWWTD and WFD. Intersectorial integration issues are particularly highlighted.
4	1 (Pollution)	General	Reach out to other sectors proactively, particularly agriculture	PM	The ICPDR developed the Guidance document on sustainable agriculture to facilitate dialogue and cooperation with agriculture. Text box is provided in the plan
5	1 (Pollution)	General	Assess the impact of the CAP revision: IPCDR and others to assess the impact of the CAP revision, and needs going forward	PM	The comment was added to the plan (chapter 8).
6	1 (Pollution)	General	Include considerations for transnational coordination in all projects	PM, RBM, MA	Examples for transboundary projects and initiatives are mentioned in the plan (e.g. Danube TMF project, Danube Hazard m3c, JDS4)
7	1 (Pollution)	General	Construct plans in ways that can adapt to emerging issues (e.g., chapter on emerging pollutants that can be updated as situations evolve)	PM	Adaptation to emerging issues is included into the wastewater management recommendations.
8	1 (Pollution)	General	Build the case for preventative measures for pollution accidents using cost-benefit analysis	APC	Preventive measures are included for Accident Hazard Sites and Tailings Management Facilities. High remediation costs in comparison to prevention costs are underlined.
9	1 (Pollution)	General	Shift to source-based framing and regulation (informed by better source-based analysis)	PM	This aspect is included to the recommendations on managing hazardous substances pollution
10	1 (Pollution)	General	Narrow knowledge gaps, build a science-policy interface	PM	This aspect is included by highlighting the JDS4 and the Danube Hazard m3c project.

11	1 (Pollution)	General	Data gaps: Important data gaps to be filled between scientific understandings of pollution issues and legislative aspects (e.g., groundwater, accident prevention)	PM, APC	Data gap issue is underlined for hazardous substances pollution and accidental pollution.
12	1 (Pollution)	General	Alignment with different directives and management mechanisms	PM, RBM	Examples are mentioned in the plan, e.g. aligning agriculture and water management, mining sector and water management, coherence between UWWTD and WFD. Intersectorial integration issues are particularly highlighted.
13	1 (Pollution)	General	Engagement with other sectors, including agriculture	PM	This aspect is included and highlighted, see other comments on agriculture.
14	1 (Pollution)	General	Public engagement: Further public engagement around pollution is crucial, but the “how” deserves careful consideration	PP	The ICPDR's innovative approach in engaging the public is mentioned in Subchapter 9.1.2 and details the increasing number of ways in which the public can be engaged.
15	1 (Pollution)	General	Social and ecosystem impacts: pollution impacts can highlight equity aspects	PM, RBM, PP	Social, economic and environmental impacts are taken into account in the Guidance document on sustainable agriculture and the Recommendation paper on wastewater management. Both are highlighted in the plan
16	1 (Pollution)	General	Bring forward less visible dimensions of pollution and adjust to emerging issues: microbial pollutants, microplastics, etc.	PM	Microbial pollution is rather a local issue, should be the scope of national plans; Microplastics issue is included and highlighted.
17	1 (Pollution)	General	Take into account climate change impacts	PM, RBM	Considerations on the linkages between pollution, control measures and climate change are included
18	1 (Groundwater)	4.1.2	Groundwater pollution is sometimes overlooked: groundwater to be considered as an ecosystem (groundwater ecology approach)	GW TG	Groundwater pollution is addressed in all outcomes of the GW TG work. It is reflected regularly in the DRBMP (pressures, status, measures, uses). It was also thoroughly investigated during JDS4. The importance of GW ecology is already somehow addressed by European legislation since 2006. However, due to lack of sufficient scientific information, groundwater ecology is addressed by the Groundwater Directive in Recital 20, stipulating research towards providing better criteria for ensuring groundwater ecosystem quality and protection. Since 2015, the EU WFD CIS Working Group Groundwater (WG GW) is organising targeted meeting sessions and workshops, bringing together the scientific community and explore the current state of research. At present there is still a substantial lack of information on this issue, further research is needed and also a feedback from the EU WFD CIS WG Groundwater. Groundwater ecology has been discussed in the GW TG since 2017 and also considered for JDS4 as a potential indicator of GW quality. The GW TG agreed in the past to keep the groundwater ecology on the agenda of future meetings to develop the knowledge level.

19	1 (Groundwater)	4.1.3	Stronger attention to be granted to groundwater	GW TG	The GW TG is fully aware of this situation and that is why groundwater research had a prominent place in JDS4. In order to promote groundwater, the ICPDR produced a leaflet "Rivers invisible twin". It is also suggested to utilise the forthcoming UN activity: "Making the invisible visible: 2022, the year of groundwater" for drawing stronger attention to groundwater.
20	1 (Groundwater)	4.1.4	Data gaps: Important data gaps to be filled between scientific understandings of pollution issues and legislative aspects (e.g., groundwater, accident prevention)	GW TG	Next to DRBMP 2021, additional groundwater data can be found in the national RBM plans and also in the JDS4 report. All this data is publicly available on-line.  At European level, the voluntary GW Watch List at European level is addressing this issue of gap filling between science and legislation, supporting the respective amendment of EU legislation (e.g. the current review and revision of the Annexes I and II of the GWD).  At ICPDR level, the Joint Danube Surveys are important activities focusing exactly at the same issue, gap filling with data (e.g. emerging substances), which are not yet fully addressed by legislation.
21	1 (Groundwater)	4.1.4	Bring forward less visible dimensions of pollution and adjust to emerging issues: groundwater, microbial pollutants, microplastics, etc.	GW TG	The GW TG (and the MA EG) is fully aware of this situation and that is why research of groundwater (and of microplastics, microbial contamination and antibiotic resistance) was included in JDS4 monitoring and are published in the JDS4 report and all data are publicly available online. It is also suggested to utilise the forthcoming UN activity: "Making the invisible visible: 2022, the year of groundwater" for drawing stronger attention to groundwater.
22	1 (Groundwater)	4.1.4	Transboundary water bodies and ground water are affected by pollution from agriculture.	GW TG	The GW TG is aware of this situation. Nitrates are top chemical pollutants of groundwater in the DRB. Nutrients and pesticides are being monitored in groundwater. The measures towards reducing groundwater pollution from agriculture are in place since the first DRBMP 2009.
23	2	8.1.5	Develop an action plan for improving the process of measures implementation already within the next planning cycle. Analyzing the drivers enabling rapid implementation and the obstacles slowing own the process that leads to the adoption of action plans, which enable speeding up the implementation within the next planning cycle.	HYMO	A sentence with recommendations for the preparation of "action plans" was added within the management objectives of chapter 8.1.5 and all related sub-chapters (8.1.5.1 on Hydromorphological Alterations; 8.1.5.2 on Interruptions of River Continuity and Sediment Balance Alteration; 8.1.5.3 on "Morphological Alterations").
24	2	6.5	Improve the current knowledge-base on small hydropower planning and regarding the potential increase of hydropower in energy portfolio of countries.	HYMO, RBM	Please refer to DRBMP Update 2021 chapter 6.5 and additional efforts from Danube countries "to continue consolidating and updating existing data on the location and generation capacity of hydropower plants in the DRB."

25	2	General	Prepare “pipeline projects” for incoming funding opportunities based on integrative approach. Preparing longitudinal and lateral projects at operational level generally takes a long time and requires joint efforts. Starting in advance enables reacting on emerging funding opportunities.	HYMO, ECON	A sentence with recommendations for the preparation of "action plans" was added within the management objectives of chapter 8.1.5 and all related sub-chapters (8.1.5.1 on Hydromorphological Alterations; 8.1.5.2 on Interruptions of River Continuity and Sediment Balance Alteration; 8.1.5.3 on "Morphological Alterations"); additionally, Danube countries can further work on "pipeline projects" on national level.
26	2	8.1.5	Continue developing practical guidelines on green measures and nature based solution application in tackling ecological and hydromorphological challenges. The use of those measures should be promoted on all levels. Explicitly, it is important to promote them on supra-regional level and in transboundary areas.	HYMO	Additional sentence about the importance of nature-based solutions added also in chapter 8.1.5.3.2 on the Disconnection of Adjacent Wetlands/Floodplains; additional sentence about importance of further good practice exchange on national and international level added in all sub-chapters of chapter 8.1.5 (management objectives).
27	2	General	Support the management of conflicts rooted in past hydromorphological alterations. Past hydromorphological alternations have legacy effects on the current status of water bodies. In many cases, win-win solutions could be found. A special focus and conflict management approach is required in areas, where improvement is needed and win-win solution are not apparent or not applicable.	HYMO	A sentence was added within the management objectives related to morphological alterations (chapter 8.1.5.3).
28	2	General	Prepare common guidelines for issues related to agriculture and land ownership. Multiple effects of agricultural management on land and water makes it a significant leverage point for river basin management. This means that even a small improvement in land management can have many benefits on water, ecosystems, water security in landscapes. Agricultural management is often an obstacle to implementation of measures. Therefore, special attention and guidance is needed for cross-sectoral cooperation, and land ownership. Furthermore, opening of public debates and facilitated governance dialogues are needed.	PM	The ICPDR developed the Guidance document on sustainable agriculture to facilitate dialogue between water management and agriculture and to provide support for policy making and measure implementation. The guidance is highlighted in the plan.
29	2	General	Choose holistic approach when considering the nexus between water body status and biodiversity. Water sector should be involved in the implementation of the Biodiversity Strategy. Special caution should be paid, when defining what improving of biodiversity means in different water body and river types. The focus on species ecosystem function should be balanced with the demand on increasing biodiversity, and effect of invasive species on river systems should be considered.	HYMO, RBM	The reference to "biodiversity conservation" was added to chapter 8.1.5.3 on Morphological Alterations and related management objectives with regards to disconnected Wetlands/Floodplains.

30	2	General	Seek common solution and synergies with societally relevant and water related issues such as water scarcity and drought. Always select integrated and win-win measures where feasible.	RBM	This comment is welcomed and acknowledged, but does not require a revision in the DRBMP Update 2021.
31	2	General	Support consequent respecting of principle of non-deterioration on sub-national level. Examples were given where on sub-national level, the local political will or stakeholder interests are prioritized over the goals of the management plans.	RBM	This comment is welcomed and acknowledged, but does not require a revision in the DRBMP Update 2021.
32	2	General	Continue well designed data collection and monitoring as base for effective discussion for projection of impact assessment and status development.	MA	This activity belongs to tasks of the MA EG.
33	2	General	Include Danube Transnational Programme Danube Floodplain project results into the plans and present/identify all potential floodplains for restoration, including one on agriculture lands. It helps to define the pathway for next steps and develop the pipeline projects for floodplain restorations.	HYMO	The text box on the Danube Floodplain Project (DFP) is updated based on Danube Floodplain Project final results (see chapter 2.1.6.3.2 on Disconnection of Adjacent Floodplains/Wetlands); a reference to the need for further implementation of the DFP results was added in chapter 8.1.5.3.2 on Disconnection of Adjacent Wetlands/Floodplains.
34	2	General	Increase the level of ambition in integration issues, working closely with the relevant sectors, including agriculture and the general public.	RBM	This comment is welcomed and acknowledged, but does not require a revision in the DRBMP Update 2021. The importance of integration issues and cooperation with other sectors is highlighted in chapter 6 ("Integration Issues").
35	2	General	Improve public communication by explaining how people can profit personally from measures such as restoration and environmental protection measures. Use appropriate language and terminology.	PP	Addition of the phrase 'as up-to-date, effective and accessible as possible to the broadest audience' to the enumeration list of the public participation activities the ICPDR is engaged in, in subchapter 9.4.1.
36	2	General	Increase funding available for hydromorphological issues at the level similar to investments targeting pollution.	ECON, HYMO, RBM	A sentence including the aspect was added to chapter 8.1.6 ("Hydromorphological Measures Addressing Adaptation to Climate Change Impacts").
37	2	General	Share the financial burden for projects with international / basin wide benefits.	ECON, RBM	A sentence including the aspect was added to chapter 8.1.6 ("Hydromorphological Measures Addressing Adaptation to Climate Change Impacts").
38	2	General	Support projects addressing more than one objective (seeking for synergies).	RBM	This comment is welcomed and acknowledged, but does not require a revision in the DRBMP Update 2021. The importance of integration issues and cooperation with other sectors is highlighted in chapter 6 ("Integration Issues").
39	2	General	Focus on improvement of existing status and preventing further deterioration of water status. Properly assess new projects.	RBM	This comment is welcomed and acknowledged, but does not require a revision in the DRBMP Update 2021. The importance of measures to improve the existing status and prevent further deterioration is highlighted in the DRBMP Update 2021, in particular with reference to chapter 8 ("Joint Programme of Measures").

40	2	General	Talk more about solutions and potential instead of (only) problems. It is time for action!	RBM, HYMO	This aspect is already included and addressed in all HYMO relevant management objectives outlined in all relevant sub-chapters of chapter 8.1.5.
41	2	General	As JDS4 has shown, hydromorphological pressure on fish is apparent along the whole Danube and there's no general improvement since the last plan. We see the need of identification, restoration and monitoring of the habitats of migratory fish species	MA	Monitoring of the habitats of aquatic organisms including migratory fish species is being carried out regularly during Joint Danube Surveys.
42	2	General	The biodiversity is the very basic of our existence and yet, the conservation status of the habitat of freshwater fish species, most of them are in unfavorable status. Since so many species are endangered and environmentally friendly detectors were developed already, we propose to implement the environmental-DNA method monitoring systems. They have proven to be effective, during the Joint Danube Survey. This would mean there will be no need to remove the rare individuals from the environment and jeopardize species conservation	MA	MA EG will explore possibilities of implementing of environmental-DNA method monitoring systems for aquatic species including fish species.
43	4	General	Strengthen the use of CBA (Cost-Benefit-Analysis) at project level.	ECON	This aspect was added in chapter 7.5 ("Economic Assessment of Measures").
44	4	General	Increase capacity at national/regional level for the development/selection of projects.	ECON, RBM	This aspect was added in the conclusions of chapter 7 ("Economic Analysis").
45	4	General	While transboundary cooperation is already fruitful, show the benefits of upstream-downstream innovative financing through smaller scale projects.	ECON, RBM	This aspect was added in the conclusions of chapter 7 ("Economic Analysis").
46	4	General	The recovery funds offer significant additional funding opportunities; to be used wisely - use of the Do No Harm principle when planning/executing new projects (esp. for flood protection), e.g the Recovery and Resilience Facility in some countries.	ECON, RBM, FP	The "Do No Harm principle" was added to the bullet point on the "Recovery and Resilience Facility" in chapter 8.5 ("Financing the Joint Programme of Measures").
47	4	General	Need to prioritize projects offering multiple benefits (e.g including ecosystem services related benefits). Nature-Based Solutions is a useful approach for this.	RBM	This comment is welcomed and acknowledged, but does not require a revision in the DRBMP Update 2021. The efforts towards coordinated implementation of the WFD and FD is highlighted in chapter 6.1 ("River Basin Management and Flood Risk Management") as well as chapter 8.1.5.3.2 ("Disconnection of Adjacent Wetlands/Floodplains").
48	5	General	Converting national questions to local ones helps securing support among people	PP	The ICPDR's 'decentralising strategies' as mentioned in Subchapter 9.1.1, are already enabling a new approach towards encouraging the participation of organised groups, communities, and citizens at local level. Thus, additional integration of this comment into the DRBMP Update 2021 is not necessary.



<b>49</b>	<b>5</b>	<b>General</b>	The 3 pillars of “Cleaner, Healthier, and Safer” represent pivotal points of the future communication	<b>PP</b>	The following text was added to subchapter 9.1.2: 'Despite a broadening variety of communications activities, the ICPDR’s three key pillars of “Cleaner, Healthier, and Safer” remain pivotal and timeless key aims that should be retained in all communications and guide all relevant events and actions.
<b>50</b>	<b>5</b>	<b>General</b>	Positive framing, make sure to always be in win-win-situations	<b>PP</b>	The ICPDR's role is to be an honest broker and to report the situation to our community and stakeholders. While we always seek opportunities to spread positive messaging when we have it, we nonetheless have to remain unbiased in our reporting – thus this comment is acknowledged, but no additional integration into the DRBMP Update 2021 is necessary.
<b>51</b>	<b>5</b>	<b>General</b>	Water sector issues can only be solved in an integrated way with other sectors	<b>RBM</b>	This comment is welcomed and acknowledged, but does not require a revision in the DRBMP Update 2021. The importance of integration issues and cooperation with other sectors is highlighted in chapter 6 ("Integration Issues").

### 2.3 Danube Flood Risk Management Plan Update 2021 – Comments Received in Writing

Nr.	Ch.	Ref.	Organis.	Comment	Relevant EG	Treatment of comment
1	Whole plan		WWF CEE	<p>I. WWF highly appreciates that green measures are included in the updated draft DFRMP2 main text and it is declared that natural water retention may have a significant role in flood risk management.</p> <p>However, some more details in the annexes (esp. annex 2 on measures) do not reflect this green approach or the level of their application is unclear.</p> <p>In some countries implementation of green measures for flood mitigation are lagging behind and interventions go against nature conservation objectives. From the Danube basin level FRMP's the annex 2 (overview of measures) lists green measures as well, but the ratio between the traditional, grey measures and green ones are not indicated, only a general list on national level. We understand that such a basin plan cannot include measures' breakdown per water bodies, but at least on national level could be indicated the above-mentioned ratio to have a better view on progress toward integrated and more sustainable solutions.</p> <p>Also, there is no convincing evidence among the examples, projects or data mentioned in the plan that underline the above mentioned green approach, although the statements of the text communicate that the green measures are considered or are priorities. We suggest that all information and examples are shared which show evidence that the green solutions are as important in flood risk management as the grey measures, or that the consideration of them is a priority, or at least key aspect during flood risk management planning on national level. There are examples and projects in the draft, including promising elements or already results, but data or maps are not shared where the reader can compare what the exact proportion of grey and green measures is. Such data in summary tables or on maps would help to see the overall picture and judge the level of ambition on basin wide or on national level.</p>	FP EG	<p>It will be included in the next DFRMP.</p> <p><i>Also, there is no convincing evidence among the examples, projects or data mentioned in the plan that underline the above mentioned green approach: about one third of examples demonstrate an integrated or green approach; a number of projects addressing green approach are presented (Danube Floodplain, FRAMWAT, LIFE-MICACC and especially Coca-Cola - WWF "Partnership for a living Danube", which is also displayed in Annex 5</i></p>
2	Whole plan		WWF CEE	<p>WWF appreciates that Danube basin countries have agreed on some principles considered and implemented on national level with horizontal impact in the whole basin. What is still missing is the practical information about the concrete cross-border, multinational joint actions. Like in the Danube basin river basin management plan, prioritized basin-wide or key transboundary actions should be part of the DFRMP2</p>	FP EG	<p>The major ICPDR platform for a joint implementation of the strategic level measures are the transboundary projects supporting DFRMP. These are described in the DFRMP and also in the Annex 2 and provide lots of practical information about the concrete cross-border, multinational joint actions</p>

3	Whole plan		WWF CEE	WWF welcomes the process of WFD and FD harmonization on the Danube basin level (The specific comment on the harmonization is in the text further down.) WWF would like to raise the attention to the integrated solutions promoted also under the DRBMP. Priority should be given to integrated solutions that solve several problems at the same time, not only flood management, but also drought mitigation, water quality improvement or biodiversity objectives with a longer term perspective	FP EG	Integrated solutions are promoted in the DFRMP as examples of best practices, projects (Danube Floodplain, FRAMWAT), Annex 5, and also in Chapter 7 on Coordination with WFD. It will be further promoted in the next DFRMP
4	3	3.2	WWF CEE	chapter 3.2 flood risk maps: Please include data in the chapter about the reference year of the maps. Are they also dated in October 2019, like APSFRs? Or these maps were developed in 2020?	FP EG	Reference year is always presented on FHRMs. They all are from autumn 2021.
5	3	3.3	WWF CEE	chapter 3.3 – it is not clear to which annex the text refers to, regarding the following statement: “is provided in the updated summary report on implementation of article 6 and 14 (2) of the flood risk directive in the Danube Basin District”. This information would be necessary to understand the approaches followed by the different countries	FP EG	The text refers to a separate ICPDR report which is currently under finalisation. A web link was provided in the DFRMP.
6	5		WWF CEE	Chapter 5 - We can read that the measures and their prioritisation consider those measures which have transboundary impact or basin wide importance and consider measures which are applicable in more countries. We propose to provide information about the concrete measures and their affected countries, making clear which countries belong to the concrete transboundary measures	FP EG	This information is provided in the Annex 2.
7	5 and Annex 2		WWF CEE	Chapter 5 and 5.1 and annex 2 include 3 different types of approaches for prioritization. The 1st aspect is about „measures with transboundary impact / basin wide importance and measure applicable in more countries”, the 2nd aspect is the prioritisation of measures with upstream and downstream effects (nwrn, warning system, reduction of risk from contaminated sites), 3rd aspect includes the 5 selected basin wide objectives (avoidance of new risk, reduction of existing risks, strengthening resilience, raising awareness, promoting the solidarity principle). These are 3 different aspects and their weight in the prioritization is not clear. Basically these 3 aspects are relevant and we agree with them, just we recommend to make clear which measures contribute to which aspect	FP EG	FP EG did not distinguish such three types of prioritisation. Selecting measures with transboundary impact / basin wide importance and measure applicable in more countries is the basic prioritisation criterion which is further accompanied by prioritisation of measures with upstream and downstream effects. The five objectives are an overarching principle.
8	5	5.4	WWF CEE	chapter 5.4 – It is important that the flood risk management plan and the proposed measures are evaluated from the climate change aspect, focus on integrated solutions that solve several problems at the same time such as flood management, drought mitigation, or biodiversity objectives. Climate change significantly influences the low water period and the drought phenomena and not only floods. It is recommended that the following principle is included in the flood risk management: flood risk management measures will not increase drought risk of habitats or community lands on active and hydromorphological floodplains (APSFR).	FP EG	This aspect was included into the DFRMP
9	5	5.5.2	WWF CEE	chapter 5.5.2: see our recommendation above, under the number I. overall highlight	FP EG	Task for the FP EG in the next FRM cycle and for the next DFRMP

10	5	5.5.6	WWF CEE	chapter 5.5.6 – We suggest that the definition of basin-wide measures is included in this chapter. The table in annex 2 is only a list of measures by the countries. We suggest to include or highlight here those measures that require joint efforts of all or several countries in order to have impact) In the subchapters of 5.5.6. a list of priority measures of basin-wide importance is missing. Many of these projects are not about implementation of measures, but “only” preparation. Separation of these very different statuses help to evaluate real progress.	FP EG	The major ICPDR platform for a joint implementation of the basin-wide strategic level measures are the transboundary projects supporting DFRMP. These are described in the DFRMP and also in the Annex 2 and provide lots of practical information about the concrete cross-border, multinational joint actions
11	6	6.3	WWF CEE	chapter 6.3 – The description is good and emphasizes properly that NWRMs have multiple benefits. We recommend to include one important topic: the widening of the active floodplain, relocation of dykes or regulated water outlets through dykes. More space to the rivers increases significantly the water retention capacity and it has a key prerequisite: the adaptation of land use to regular inundation. We suggest including these aspects in the text of chapter 6.3. In our opinion an important conclusion and data is missing from chapter 6.3: the geographical scale of the NWRMs measures implemented in the past and planned in the future in the Danube countries.	FP EG	The topic was included into chapter 6.3. The geographical scale of the NWRMs implemented in the past and planned in the future in the Danube countries will be discussed in the frame of FP EG and if data is available included in the next DFRMP.
12	6	6.4	WWF CEE	Chapter 6.4. The examples of this chapter provided by the Danube countries are not in line with the ideas and proposed approach in chapter 6.3. The examples are not convincing or even don't include NWRM. We conclude that NWRM is part of the countries' flood risk management approach in general. We suggest that the missing data about the scale of the implementation is added and the proportion of the implementation of green measures and grey measures	FP EG	It will be discussed in the frame of FP EG and if data is available included in the next DFRMP
13	6	6.4.6, 6.4.7, 6.4.8, 6.4.9	WWF CEE	The capacity and potential of the retention is missing in cases of CRO, SLO, RS, B&H countries. No concrete numbers or data is listed (or linked) in the document. Due to the high pressures on the water bodies, nature based solutions or NWRM have to become obligatory technical solutions, not only mentioned as preferred option if possible. Having this in mind, we also suggest deleting one part of the sentence (marked crosslined) on pg 78 (text on Croatia): "In the prioritization of the flood protection measures, the natural water retention and flood retention measures (i.e. Green Infrastructure measures) are emphasized over the structural flood protection measures where their application is technically and economically feasible."	HR, Si, RS, BA	This has to be decided by countries.
14	6	6.4.4	WWF CEE	Slovak FRMP (2015) did not implement NWRM in its full potential, only a few types of measures (from the catalogue of measures <a href="http://nwrn.eu/measures-catalogue">http://nwrn.eu/measures-catalogue</a> ) were selected and these are more likely only recommendations. Necessary additional steps for their successful implementation are missing in the Slovakian FRMP. * It is mentioned in the chapter that "the measures of water accumulation and water retention are tested in Slovakia". However, there are no results or information about these activities in the SK FRMP nor in the Preliminary flood risk assessment (2018)	SK	This has to be decided by Slovakia

15	7	7, 7.2 and 7.3	WWF CEE	chapter 7, 7.2 and 7.3 – (coordination with WFD) This chapter still includes only high level, general statements, however since the first cycle, more knowledge and data were collected and further preparations were done in the countries. The information about the implementation of win-win measures is missing from it. In chapter 7.3 about the progress, the total 15 130 hectares on basin wide level seems very low taking into account the available 6 years since 2015, especially that the implementation is not finished on all of them (planning is ongoing on 2650 ha) or were implemented only partially (7954 ha were partially reconnected). We would like to see more ambitious progress in the implementation of win-win measures	FP EG	There is a clear information about the progress synchronised with the DRBMP and based on the data collection. More detailed information on the implementation of green measures will be included in the next DFRMP.
16	7	7.5.4	WWF CEE	It was mentioned in the chapter that "The national FRMP will be approved by the Slovak Ministry of the Environment (MoE) and will form a component of the RBMP". However, in the draft of SK RBMP, description of objectives and requirements of Flood directive is vague and only refers to the PoM of Flood directive with no clear interlink with RBMPs. The draft of SK RBMP provides little evidence that the objectives and requirements of the Floods Directive have been considered. * As part of the comment process of SK RBMP, we pointed out that there are still discrepancies between the measures listed within RBMP and FRMP	SK	This has to be decided by Slovakia
17	7	7, 7.2 and 7.3	WWF CEE	We recommend to emphasize the following in chapters 7, 7.2 or 7.3: NWRM with hybrid measures can be given the much needed implementation push by taking the following steps: A) focus on integrated solutions that solve several problems at the same time, not only flood management, but also drought mitigation, water quality improvement or biodiversity objectives with a longer term perspective. B) overcome the blockage by the agricultural sector by providing the right incentives. This entails in particular the opening of CAP Pillar 1 direct payments for water retention on arable land and amendment of land use regulations to support water retention on agricultural lands, as well as inclusion of WFD compensation schemes in the CAP Pillar 2 for restrictions of certain land use such as water drainage, time of seeding, or irrigation due to conservation measures. C) Building capacity in authorities for planning and implementing restoration and conservation measures together with key sector representatives, such as agriculture, flood mitigation, nature conservation, forestry. D) Preparing a pipeline of projects including feasibility studies, stakeholder engagement, and agreements with land-owners, technical design and permits and funding allocation. E) Allocating financial resources e.g. from the National Recovery and Resilience budgets, the Operational Programmes and Common Agricultural Policy funding lines to the Programmes of Measures.	FP EG	The items A-E) were added into chapter 6.3

18	8	8	WWF CEE	Chapter 8 about CBA - Many methodologies are available on cost-benefit analysis, but we miss information in the country sub-chapters whether the CBA is a real decision making support tool during the selection of measures and during the FRMP implementation process. The experience is that there is a lack of knowledge on this field among the experts and at the institutions responsible for FD and WFD. We recommend to add trainings and knowledge sharing in the proposed activities in Danube countries during the coordinated and harmonised WFD - FD implementation	FP EG	Countries still to add text if possible. Knowledge sharing is taking place at FP EG meetings.
19	10	10	WWF CEE	Chapter 10 international coordination: It is suggested to show in this chapter the way flood risk is managed on cross-border water bodies, including how the national FRMPs are harmonized on those stretches. This is especially relevant on long river stretches of the Danube (Slovakia-Hungary, Bulgaria-Romania) where the river flows on the country borders. Without concrete information on that, it is rather difficult for the stakeholders to get a full picture about the international coordination.	FP EG	Rejected - This issue belongs to the competence of bilateral commissions.
20	12	12.1.2	WWF CEE	12.1.2 ICPDR Observer Organisations: The name of our organisation changed from WWF DCP to WWF CEE (WWF Central and Eastern Europe).	FP EG	The name was corrected
21	5, 6	5.5.6.2; 6.3.3	WWF CEE	<p>Inputs from the Danube Floodplain project</p> <p>WWF is aware that there is an intention to include the conclusions and recommendations of the Danube Floodplain project into the flood risk management plans on basin wide level, as well as country level.</p> <p>Some of the most important conclusions from the outputs, manual and road map of the project which we would like to emphasize:</p> <p>a) Reducing the connectivity between channel and floodplain is the major threat of floodplain ecosystems in the Danube Basin. The approaches to achieve lateral connectivity in pilot areas are different. The most common measure is the relocation of dykes, others are the creation of connection channels or the modification of channel planform.</p> <p>b) The results of meso-scale biodiversity assessment in the pilot areas show that floodplain habitats, and thus biodiversity, can benefit from increasing the lateral connectivity, as intended by the majority of restoration scenarios. While the assessment on the meso-scale shows the general tendency for the development of habitats, a microscale analysis gives insights on the level of species or specific communities. However, this requires in-depth knowledge of the setting and cannot be obtained without extensive fieldwork</p> <p>c) Integration of the environmental objectives and flood risk management objectives requires moving away from the classical flood protection solutions to nature-based ones.</p> <p>d) To affect the peak discharge, we consider it crucial not only to consider a single restoration measure but a combination of multiple measures, on the river channel, the floodplain extent, and the character of the floodplain (natural conditions).</p> <p>e) Nature based solutions refers to actions in which reducing the flood risk is provided, while</p>	<b>Danube Floodplain Project Lead</b>	All emphasized items were included into respective chapters of the DFRMP

				<p>at the same time natural properties of the floodplains are restored and preserved</p> <p>f) Because of the multiple benefits provided by natural floodplains, EU policies encourage floodplain restoration based on integrative plans and win-win solutions. Synergies between Flood Risk Management Plans (FRMP) and River Basin Management Plans (RBMP) should be mainly reflected by sustainable measures either addressed for the prevention and mitigation of floods, but in the same time for reaching the environmental objectives of the water resources.</p> <p>g) Agreement on the wide range of benefits provided by floodplain and river restoration could be ensured by using an approach rooted in ecosystem-based management when developing river basin and flood risk management plans.</p> <p>h) Considering the specific criteria, 24 potential floodplains (see table below) were also identified. Potential floodplains represent in fact one of the key interest points considering the improving the lateral connectivity on Danube River. Ranking (need for preservation + restoration demand) has been performed for all active Danube floodplains  <b>INCLUDING:</b> Table 1 Delineated potential floodplains along the Danube and gauges, where the 1D model results are handed over to the next downstream partner</p>		
22	Maps	Map 1	WWF CEE	<p>Map 1 – We acknowledge that the methodology of flood hazard areas depends on country decisions, but map 1 is not so informative with this approach. With respect to Croatia's Danube basin sites on Map 1, it seems to show that about 90% of the country is affected somehow by medium probability floods. These are under flood risk within 100 square kilometres or under flood risk of rivers shorter than 50 km. The map 1 in this format can be interpreted that the river / stream network of Croatia is so dense, that there is almost no square kilometre which is not affected by waters. This does not seem to be logical if we consider the topography and the land use of these territories.</p>	FP EG	The FP EG already discussed this issue in the frame of FHRM review, and agreed that it is feasible. It will be addressed in the frame of the upcoming review
23	Maps	Map 5a	WWF CEE	<p>MAP 5a – the sites where the PAs and the low probability flood areas are overlapping should have different colour than red or purple. The map now doesn't show the overlap of these two categories. We see the low probability flooded areas with red and the protected areas with purple, but the overlapping areas don't have a different colour.</p>	FP EG	The FP EG already discussed this issue in the frame of FHRM review, and agreed that it is feasible. It will be addressed in the frame of the upcoming review
24	Maps	Map 5b	WWF CEE	<p>Map 5b – We suggest that in the upcoming updated version not only the total number of protected areas are on this map, but data of the size of these areas is also available. The total size is more informative than the total number of PAs</p>	FP EG	It will be addressed by the FP EG in the frame of the upcoming review

## 2.4 Danube Flood Risk Management Plan Update 2021 – Stakeholder Workshop

Nr.	Ch.	Comment	Relevant EG	Treatment of the comment
1	4.3.2 Highlights of the discussion: NBS/Green measures in FRMP	Strong emphasis on promoting green measures exists but there is room for improvement: Better explained benefits and efficiency of these measures for flood protection.	FP	Ch. 6.3 was expanded by the text from WWF CEE with the slight amendment agreed by the FP EG and WWF.
2	4.3.2 Highlights of the discussion: NBS/Green measures in FRMP	Further support research projects or network (e.g. conference) of institutions which would research further cumulative effectiveness of NBS on basin wide level.	FP	FP EG will continue acting in the next FRM cycle
3	4.3.2 Highlights of the discussion: NBS/Green measures in FRMP	Improve communication and promotion of the green measures continuously and add concrete examples of already implemented green measures in the Danube basin.	FP	Green measures are promoted in the DFRMP as examples of best practices, projects (Danube Floodplain, FRAMWAT), in the Annex 5, and also in Chapter 7 on Coordination with WFD. To be further promoted in the next DFRMP
4	4.3.2 Highlights of the discussion: List of measures	List of measures is like a shopping list. No information on how these measures are coordinated and implemented in practice. What is missing: Progress achieved in implementing these measures / evaluating the progress made	FP	Options for green measures implementation analysis will be discussed by the FP EG and will be included in the next DFRMP



5	<b>4.3.2 Highlights of the discussion: Coordinated development of the FD and WFD planning document</b>	Significant increase in coordination and cooperation between FRMP and RBMP but with different experiences on the national level (subsidiarity). There is a need for better integration of different directives/frameworks: flood protection, habitat directive, Natura2020, RBMP.	FP, RBM	<b>Task for the FP EG in the next FRM cycle and for the next DFRMP</b>
6	<b>4.3.2 Highlights of the discussion: Cross-sectoral cooperation</b>	Better cooperation/coordination on cross-sectoral level when implementing measures (spatial planning, building regulation, emergency management, agriculture, forestry, environment, etc.)	FP	<b>Task for the FP EG in the next FRM cycle and for the next DFRMP</b>
7	<b>4.3.2 Highlights of the discussion: Cross-sectoral cooperation</b>	Spatial planning sector needs to be included in the whole process.	FP	<b>Task for the FP EG in the next FRM cycle and for the next DFRMP</b>
8	<b>4.3.2 Highlights of the discussion: Cross-sectoral cooperation</b>	Better incorporation of the agricultural sector where farmers would offer their agriculture area for retention areas.	FP	<b>Task for the FP EG in the next FRM cycle and for the next DFRMP</b>
9	<b>4.3.3 Calls to action: More knowledge</b>	Knowledge on benefits and efficiency of NBS for flood protection needs to be systematically collected, evaluated, and assessed and better communicated to the stakeholders	FP	<b>Task for the FP EG in the next FRM cycle and for the next DFRMP</b>
10	<b>4.3.3 Calls to action: More knowledge</b>	The ICPDR could support research projects or network (e.g., conference) of institutions which would research further cumulative effectiveness of NBS on basin wide level.	FP	<b>Support to such research projects will be given</b>

11	<b>4.3.3 Calls to action: Efficient communication</b>	To add concrete examples of already implemented green measures in the Danube basin.	FP	<b>Green measures are promoted in the DFRMP as examples of best practices, projects (Danube Floodplain, FRAMWAT), in the Annex 5, and also in Chapter 7 on Coordination with WFD. To be further promoted in the next DFRMP</b>
12	<b>4.3.3 Calls to action: Better communication</b>	To increase the understanding and awareness as to why this coordination supports better implementation by avoiding conflicts and implementing win-win solutions. It's much more than "selling information" to the public, it's about to show what we share interests. We need to show that the issues we care about are "win-win" situations.	FP	<b>Ch. 6.3 was expanded by the text from WWF CEE with the slight amendment agreed by the FP EG and WWF.</b>
13	<b>4.3.3 Calls to action: Better communication</b>	To be added: a simple summary/table how different measures are implemented/included in the national plans.	FP	<b>Task for the FP EG in the next FRM cycle and for the next DFRMP</b>
14	<b>4.3.3 Calls to action: Better communication</b>	More efforts towards better evaluation of the progress with implementation of measures.	FP	<b>Task for the FP EG in the next FRM cycle and for the next DFRMP</b>
15	<b>4.3.4 Summarizing messages</b>	Relevant challenges and processes are incorporated in the plan.	FP	<b>We agree</b>
16	<b>4.3.4 Summarizing messages</b>	Synergies by implementing NWRM, NBS with the implementation of the WFD, CC Adaptation Strategy, Biodiversity Strategy, etc. shall be better promoted.	FP	<b>Green measures are promoted in the DFRMP as examples of best practices, projects (Danube Floodplain, FRAMWAT), in the Annex 5, and also in Chapter 7 on Coordination with WFD. To be further promoted in the next DFRMP</b>
17	<b>4.3.4 Summarizing messages</b>	Some extra effort is needed (e.g., executive summary) to make the DFRMP better understandable, especially for the general public.	FP	<b>The executive Summary has been prepared</b>
18	<b>4.3.4 Summarizing messages</b>	Cooperation/coordination and integration of all relevant sectors is the key element of reducing flood risk in a sustainable way.	FP	<b>We agree</b>

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## 3 Annex B: Stakeholder Consultation Workshop

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### 3.1 Introduction

The Stakeholder Consultation Workshop, *Our Opinion – Our Danube*, was a one-and-a-half day (online) event hosting more than 200 participants. Stakeholders and interested parties from across the Danube were invited to contribute their input to the Public Consultation process for the Danube River Basin Management Plan (DRBMP) & Danube Flood Risk Management Plan (DFRMP) Updates 2021. Both Plans are being revised and updated to guide the direction of the ICPDR for the next six years until 2027. Holding this event was one of the pivotal aspects for their successful and effective implementation.

Representatives of civil society and stakeholders were asked to contribute their views and have their say. The people of the Danube River Basin will be affected by the measures in the plans for generations to come and it is important that they are involved in their development from the outset.

The previous workshop happened live in 2015 in Zagreb under the name *Voice of the Danube*. Due to the pandemic restrictions, in 2021, the Danube River Basin experts, stakeholders, and members of the public convened online only. This, however, has proven to be a very effective way for many participants to comfortably join and discuss on both plans as well as pre-determined workshop topics. The outcome of the workshop was then processed in the form of this Stakeholder Consultation Workshop Report 2021.

### 3.2 Before the event

The preparations for the event started with ICPDR and Global Water Partnership Central and Eastern Europe (GWP CEE) working on the framework of the event, including the scale, format, platform, and roles and responsibilities. It was decided that there would be two core blocks of the event: the *Stakeholder Statements*, and the *Danube Café* discussion sessions.

The stakeholder statements allowed the participants to address the DRBMP and DFRMP and inform the remaining audience about their findings as well as their point of view regarding related issues. These statements were collected before the event to ensure a good technical flow of the session and a proper support from the organizers.

Five pre-determined Thematic Areas, relevant to the two plans, were discussed in a series of *Danube Café* workshop sessions. The outcome of these sessions was gathered and delivered during the *We Discussed Danube* session on the second day of the workshop, and all comments will be taken into consideration during the finalization of both plans due in December 2021.

The chosen Thematic Areas included:

- Organic, Nutrient and Hazardous Substances Pollution of Surface and Groundwater
- Hydro-Morphological Alterations & Integration Issues (Flood Risk Management, Hydropower, Nature Protection, Navigation, Agriculture)
- Objectives and Measures of Flood Risk Management Plans
- Support to Implement Both Plans, Financing of the Measures
- Communication and Public Participation

## 3.3 The Event: Our Opinion – Our Danube

### 3.3.1 Day 1 (29 June 2021, Danube Day)

The event was facilitated by Mr. Steve Chaid (California-born and Vienna-based journalist and a professional event moderator) Mr. Chaid welcomed the participants, opened the event, and introduced the basic rules as well as the overall agenda.

#### 3.3.1.1 Session 1: Introduction to the Draft Plan Updates

##### **Keynote speech by ICPDR President, Momčilo Blagojević**

Mr. Blagojević emphasized the unusual times and the stakeholders' successful adaptation. This venue, he said was giving Danubian citizens a unique opportunity to have their say. There is a legal requirement behind the public consultation like this. i.e., it is article 14 of the EU Water Framework Directive, and both articles 9 and 10 of the EU Flood Directive that require us to conduct some level of public consultation during the process. The event also gives stakeholders an opportunity to have their say and for the ICPDR to get direct input on both plans. Mr. Blagojević wished everyone a fruitful consultation and passed the word over to the ICPDR Executive Secretary, Ivan Zavadsky.

##### **Introductory speech by ICPDR Executive Secretary, Ivan Zavadsky**

Mr. Zavadsky introduced the two plans, the DRBMP and the DFRMP Updates 2021. The DRBMP Update 2021, he explained, provides a framework for operational integrated water resources management, gives an overview of key issues and challenges, and sets out the central objectives for required actions. The newest part of this plan is the fifth section called *Significant Water Management Issue on the Effects of Climate Change, Drought, Water Scarcity, Extreme Hydrological Phenomena, and other Impacts*. Mr. Zavadsky then described the plan in a deeper detail. The plan update 2021 puts a strong emphasis on the topic of integration with other sectoral policies.

The DFRMP Update 2021 presents the results of updated preliminary flood risk assessments, identifying potential risks from floods and endangered areas. The objectives of the DFRMP Update 2021 are:

- To avoid a new risk
- To work towards a reduction of existing risk
- To strengthen the resilience
- To raise awareness and promote the solidarity principle

The DFRMP Update 2021 presents strategic basin-wide level measures to prevent and reduce damage to human health, environment, cultural heritage, and economy.

Both plans are based on the two EU Directives. The question is how to make them work in harmony. Mr. Zavadsky informed that the synergies of both directives have been explored and opportunities found to make this work.

##### **The “Voice of the Young Stakeholders”**

The current president of the Sava Youth Parliament, Tana Bertic, spoke on behalf of the youth of the Danube Basin. Ms. Bertic summed up a history of youth activities in the Sava River Basin and their relation to the water issues. During the last Sava Youth Parliament meeting, discussions focused on defining methods to harmonize different interests between stakeholders.

The young professionals then focused on three main issues. Protection of the harmful impacts of water and managing floods, the quality of water related to waste, and the protection of water resources. Young people are aware that floods are becoming more frequent and are the result of human actions. There's a need for a new approach to tackle these and other pressing water-related issues. It is necessary to change the mindset of people, Ms Bertic added.

Ms. Bertic emphasized that the youth is ready to support any activities that mitigate or prevent any further damage to the environment. The Sava Youth Parliament is also not forgetting to preserve the basin's cultural heritage, as this is this year's subject of the Parliament's annual event.

At the end of her speech, Ms. Bertic invited all the youth of the Danube River Basin to follow the activities of the Sava Youth Parliament in a hope that one day they would be able to organize a joint event to enhance transboundary water cooperation.

### 3.3.1.2 Session 2: Stakeholder Input

#### **Interim results from the online public consultation questionnaire**

Mr. Chaid briefly presented the interim results from the online public consultation questionnaire. The results showed that the ratio of male to female responders was 46% to 54% in favor of female participants. About 65% of responders have heard about the DRBMP and the DFRMP Updates 2021. 99% believe that transboundary collaboration is most effective. The responders were also unanimous about the question of the necessity of a reduction of organic pollution insufficiency. Most of them stated that more can be done. Moving on, 87% think that the current flood protection measures won't offer full protection against flooding. Words like "extreme temperatures" and "water levels increase" or "droughts" are the words that resonate the most today.

#### **Statements from stakeholders**

Representatives from 9 key stakeholders, who are also among the ICPDR's 24 Observers, made statements on behalf of their organizations:

#### **Irene Lucius of WWF-CEE**

'We appreciate the progress that has been made in Danube region and flood risk planning over the past two decades, such as sturgeon conservation, wetland restoration, or climate change adaptation', said Mrs. Lucius. 'We also want to emphasize on the numerous opportunities for discussions that ICPDR offers. We believe that need and potential for river and wetland restoration is much higher than what is in the plan. More larger scale projects are possible and needed. The focus should divert to integrated solutions such as flood management, drought mitigation, water quality improvement, or biodiversity objectives. Secondly, overcoming the blockage by the agricultural sector by providing the right incentives. The last point is to build a capacity for project preparation within authorities', she added.

Mrs. Lucius then spoke about fish biodiversity. 'As JDS4 has shown, hydromorphological pressure on fish is apparent along the whole Danube and there's no general improvement since the last plan. We see the need of identification, restoration and monitoring of the habitats of migratory fish species.

Regarding the DFRMP Update 2021, it is not clear whether the transboundary aspects of flood risk management in the frame of bilateral agreements and permissions take into account future flood risk mitigation plans and measures of neighbors.

In summary, WWF-CEE believes the implementation push is possible. That entails the following:

- Allocating financial resources to the program of measures,

- Building capacity for planning and implementing restoration and conservation measures with key stakeholder representatives,
- Preparing a pipeline of projects, including feasibility studies, stakeholder engagement, and landowners' agreements', she concluded.

### **Gerd Frik of VGB Powertech e.V.**

Mr. Frik said that the VGB focuses on the issues of hydropower and its challenges, like ecological impact on the Danube River and EU Green Deal strategies and their 55% CO2 emission reduction until 2030. The hydropower sector has been involved in these processes in the last years, as well as some research projects. 'Our statement on the DRBMP Update 2021 has two corner stones, to support the EU community climate policy goals to cover the energy demand from renewable sources, and to continue to ensure the efficient and sustainable implementation of the objectives of the Water Framework Directive', he said.

Mr. Frik then focused on hydromorphological alterations and how stakeholder involvement and inclusion of the agricultural sector is imperative from VGB's point of view. 'Definition of sound and achievable objectives is the key to this cooperation' he also said.

'There are still considerable knowledge deficits in scientific basis of measures, monitoring, and best practices. In addition, there are also strategic deficits. The sound knowledge must be created in order to find sustainable measures and to implement them. Last but not least, the approach taken so far shows that the economy and the ecology are not mutually exclusive in case of water bodies. The Water Framework Directive offers the users the possibility to continue with new and realistic goals for the future activities.

Public funding is required, not only in case of Water Framework Directive. We are well established with this, but still need to support big ecological measures in the future. Focus on improving public funding in the south-east region is now the key', he concluded.

### **Theresia Hacksteiner of the European Barge Union**

In the context of inland navigation, Mrs. Hacksteiner recalled the publication of Sustainable and Smart Mobility Strategy of the EU Commission, which seeks to increase the mobile share of inland waterway transport substantially in the coming years. This is based on the Green Deal which has a key objective to deliver a 90% reduction in transport-related greenhouse gas emissions by 2050.

Contrary to the contrasted roads of Europe, waterways dispose of free capacity and thus offer a significant mobile shift potential in line with these objectives. On the 24<sup>th</sup> of June 2021, the EU Commission published its Inland Waterway Transport Action Plan to boost the future waterway plan for inland transport. It announced help for waterway managers to ensure a high level of service along EU waterway corridors by December 2031. The Commission will also give more support for projects aimed at completing and upgrading the inland waterway trans-European network.

'We welcome that in the draft of the plans, the inland waterway network has also been recognized. We appreciate that climate change has been addressed as a new topic. It has a huge impact on water level and affects the reliability and services of inland navigation. We would like to fully engage in the update of the DRBMP Update 2021.

In the update of the draft, it is ensured that the safety of inland navigation is a challenge that needs to be addressed as a climate change-related risk. Overall, we welcome the integration with other sectors that will create synergies and avoid potential conflicts. European Barge Union is ready to contribute to the consultations and intensify the discussions with the ICPDR stakeholders', Mrs Hacksteiner concluded.

### **Gerhard Nagl of the Danube Environmental Forum**

Mr. Nagl stated that ‘we did not get as far as we should have by now. We need to have biodiversity and habitat connectivity posing as a significant water management issue. One of our goals is bringing back the beluga sturgeons. The populations of migratory fish species have been reduced in Europe since 1970 by 93%. We are at the brink of extinction of many migratory fish species. This calls for more biodiversity in the DRBMP Update 2021. Member states and water administration bodies need to do more for the nature conservation.

Another important issue is a catastrophic number of dams in the European continent. We need to restore the rivers back to their natural state. Multistakeholder solutions are necessary to achieve that. We should increase ambitions, especially in the member states. We should improve the funding. Our proposal is to use 20% of the recovery funds from the EU budget on biodiversity and ecosystems to meet the climate change goals. Out of those 20%, 10% should be used on river restoration.

The whole civil society needs to be included. Water administration is often very far away from the public. We need to bring the issues we are dealing with closer to the public. 2021 marks the Decade on Ecosystem Restoration by United Nations’, Mr. Nagl concluded.

### **Peter Gammeltoft of the Danube Sturgeon Task Force**

Mr. Gammeltoft briefly introduced the Danube Sturgeon Task Force. ‘We think that DRBMP Update 2021 covers all relevant water management issues and provides impressive analysis in breadth and depth. It is an excellent umbrella for national plans’, he said.

‘Critically endangered sturgeons, the flagship species for the Danube Basin, are rapidly disappearing. 2 or maybe 3 of the 6 Danube sturgeon species have already been lost. Management of sturgeons requires a management of the whole lifecycle. It is a complex issue that can only be dealt on a multi sectoral basis and transboundary level.

The DRBMP Update 2021 offers good key measures to avoid the extinction of Danube sturgeons and necessary supportive actions. Establishing fish passages, for example through the Iron Gates is one of the most important current projects’, he continued.

Mr. Gammeltoft then spoke about the issues that the ICPDR can help with. Namely, it was these:

- Restore and preserve critical sturgeon habitats,
- Reinforce co-ordination with development and operation of infrastructure in other sectors (e.g., hydropower and navigation),
- Implement joined-up transboundary approaches throughout the Danube Basin and the Black Sea,
- Create ecological networks, strengthen biodiversity and resilience to climate change,
- Save the Flagship Species will create a more resilient Danube.

### **Cristina Sandu of the International Association for Danube Research (IAD)**

Several reasons and ways for the increase of biodiversity in the Danube River Basin were presented by Mrs. Sandu. ‘The biodiversity is the very basic of our existence and yet, the conservation status of the habitat of freshwater fish species, most of them are in unfavorable status. Since so many species are endangered and environmentally friendly detectors were developed already, we propose to implement the environmental-DNA method monitoring systems. They have proven to be effective, during the Joint Danube Survey. This would mean there will be no need to remove the rare individuals from the environment and jeopardize species conservation.

If climate targets are not met, dramatic changes will occur in summer by the end of the century. The precipitation will decrease up to 30%. Temperature will rise up to 7 degrees Celsius, and the Danube



discharge will decrease up to 75%. Nature-based solutions for adaptation to climate change need to be implemented urgently.

It's the best way to mitigate climate change and reduce disasters. They are considered a key element of the Climate Adaptation Policy. Considering all these reasons, we ask ICPDR to use the financial and legal tools provided under the Green Deal and the new Multi Annual Financial Fund to implement more nature restoration solutions and increase resilience to climate change', she said.

'Establishing a Freshwater Biodiversity Task Group should be also considered, together with identifying key actions to improve the conservation status of species/habitats. We also need to maintain the hydromorphological integrity of freshwater habitats and establish ecological corridors.

Last but not least, the possibility to declare freshwater biodiversity a Significant Water Management Issue (SWMI) in the Danube Basin should be explored', she concluded.

#### **Balázs Horváth of Priority Area 4 of the EU Strategy for the Danube Region (EUSDR PA 4)**

'Based on the memorandum of understanding, we are in a frequent contact with ICPDR and working together on the implementation of the Danube Strategy and water-related issues. We have actions on hazardous and emerging substances, wastewater treatment, issues between water and agriculture, and we are helping with migratory fish issues and climate change adaptation.

We at the Danube Strategy are able to give political support to fulfil the objectives of the plans. In the next EU financing period, it will be already visible that we have tried to help embedding the objectives into the EU financial programs so money can be better targeted', he said.

'In the sub-basin activities, the JoinTisza project was very successful. Right now, preparations for the Tisza River Basin Management Plan are endorsed by the Governments of 5 Tisza countries', he added. Mr. Horváth then mentioned a couple other projects where the Strategy for the Danube Region plays a supporting role, like the Danube Sediment project, the Danube Hazard project, the Tid(y)Up project, M3C project, and the Measures project.

'Apart from the studies, we also organize workshops to bring the results closer to the stakeholders to win their support and disseminate the findings' he concluded.

#### **László Balatonyi of Priority Area 5 of the EU Strategy for the Danube Region (EUSDR PA 5)**

'The management of the environmental risks' priority area is coordinated by the governmental bodies of Hungary and Romania since 2011. The main focus of our mission is to address the challenges of the climate change, floods, water scarcity, which goes in line with the DRBMP and DFRMP Updates 2021. Therefore, in the past few years, EUSDR PA 5 contributed to the elaboration of the ICPDR Climate Change Adaptation Strategy Update.

Flood risk management is also a significant topic for the PA5. In order to achieve a reduction of flood risk events, EUSDR PA 5 provides continuous support to the implementation of the DFRMP Update 2021. We also support assessment of disaster risk, and civil protection activities in the Danube Region', he said.

#### **Prof. Dr. Wolfram Mauser of Ludwig-Maximilians-University of Munich.**

Prof. Mauser spoke about the Water-Food-Energy assessment in the Danube River Basin. First up, the water-food-energy nexus was described in order for the ICPDR and stakeholders to consider it. Just like all the statements mentioned before, Prof. Mauser also emphasized the importance of integrated solutions.

The main issue is finding the balance between supply and demand within the nexus. E.g., today's increased irrigation demand caused the drop in runoff of many rivers in the Danube Basin by 60%. The integrated assessment tells us, he explained, that irrigation water withdrawal of ~ 29 billion m<sup>3</sup>/a has



severe ecological consequences, apart from other issues. And even though the maize production roughly doubled from ~ 40 to ~ 78 Mio. t/a, the hydropower production is reduced from 37.5 to 36.7 PWh/a.

From a scientific point of view, Prof. Mauser urges the ICPDR and others to take this assessment from outside of the water sector into account before it becomes a real conflict of interest and consequences arise.

### 3.3.2 Day 2 (30 June 2021)

**Moderator Steve Chaid** welcomed the participants, reviewed what had been achieved in Day 1 and set the agenda for Day 2 – presenting the results of the breakout sessions of Danube Café.

After the presentations, **moderator Steve Chaid** summarized the results from the breakout rooms of the Danube Café.

**ICPDR Executive Secretary Ivan Zavadsky** thanked all for the preparation and two days of hard work and the wealth of opinions even if they are conflicting, an illustration of real public participation. The ICPDR, he said will support the expert and task groups in analyzing and including as far as possible, all the ideas in the two plans.

**ICPDR President Momcilo Blagojevic** thanked all stakeholders. The event, he said, was a unique opportunity for Danube citizens to state their opinion.

**Moderator Steve Chaid** had interviewed Michael Strugl, the CEO of Verbund, the Austrian electricity producer who stated the importance of stakeholder engagement and providing room for biodiversity.

Steve Chaid thanked again all participants for the important work that they have done and encouraged them to keep it up.

Participants exchanged thank-you messages before the workshop was over.

## 3.4 Summary of Danube Café discussions

The 5 Thematic Areas were the pivotal point of the stakeholder consultation workshop **Our Opinion – Our Danube**. This is where participants could **#HaveTheirSay**. The organizers split the participants randomly into groups where they took part in 5 x 30-minute discussions. This meant visiting 1 breakout room for each Thematic Area. After the time ran out in each room, each group rotated to the next breakout room to have a chance to **#HaveTheirSay** on every topic. The Thematic Areas overview, discussions and output are described below:

### 3.5 Thematic Area 1: Organic, Nutrient and Hazardous Substances Pollution of Surface and Groundwater

Danube countries have made significant efforts to reduce organic, nutrient, and hazardous substances pollution of the surface and groundwater bodies in the DRB by implementing respective measures in urban wastewater, industrial and agricultural sectors. However, further actions are needed in the next management cycle in terms of measures implementation (e.g., improvement of wastewater infrastructure and services, better implementation of good agricultural practices and agri-environmental measures and industrial safety measures), reducing knowledge gaps on emissions and their impacts (e.g., more information on sources and fate of nutrients and hazardous substances) and improving the relevant policy and financial frameworks.

### 3.5.1 Questions Posed

- Do you see any important pollution-related challenges that are not yet sufficiently covered in the draft DRBMP Update 2021?
- Do you see a need for any additional basin-wide activities to be initiated or supported by the ICPDR to reduce and control pollution?
- Which specific actions would you suggest to further enhance cooperation and coordination with relevant sectors – such as agriculture, waste and wastewater management, and industry – for the sustainable management of the Danube River Basin's waters?

### 3.5.2 Highlights of the discussion

Presented by: **Molly Robbins, GWPO**

- The ICPDR has identified three pollution-related significant water management issues, organic, nutrient and hazardous substances pollution of surface waters. Moreover, groundwater pollution by nutrients and chemicals is also considered as an issue of basin-wide relevance. For each of these issues detailed pressure assessments have been carried out and programs of measures have been elaborated in the draft DRBMP Update 2021.
- Organic pollution can disrupt the dissolved oxygen balance of surface water bodies. It stems from urban sewage collecting and treatment systems and industrial dischargers having no or insufficient wastewater treatment. Control of organic pollution needs to put in place appropriate (at least biological) treatment.
- Nutrient pollution might trigger eutrophication in lakes, reservoirs and coastal areas and might hamper the use of water resources (e.g., for drinking water supply). Nutrients are emitted either directly from point sources or via several diffuse pathways particularly from agricultural and urban areas. Management of nutrient pollution requires stringent wastewater treatment, application of nutrient free products (e.g., detergents) and best management practices to be implemented in agriculture.
- Hazardous substances pollution might have acute or chronic toxicity on living organism. Both point and diffuse sources can contribute to hazardous contamination. Moreover, operating industrial and mining facilities pose a risk to water bodies by potentially polluting them via accident events. Phasing out hazardous substances from the market products, enhanced treatment and industrial technologies, appropriate practices for safe application, runoff control and adequate safety and contingency measures at accident hotspots can help capture this type of pollution.
- Groundwater pollution is addressed by the ICPDR for 12 transboundary groundwater bodies of basin-wide importance. The overall assessment of significant pressures on the chemical status identified the nitrate and ammonium pollution as the key factor to be addressed.
- Danube countries have made significant efforts to reduce organic, nutrient, and hazardous substances pollution of the surface and groundwater bodies in the DRB by implementing respective measures in urban wastewater, industrial and agricultural sectors.
- However, further actions are needed in the next management cycle in terms of measures implementation (e.g., improvement of wastewater infrastructure and services, better implementation of good agricultural practices and agri-environmental measures and industrial

safety measures), reducing knowledge gaps on emissions and their impacts (e.g., more information on sources and fate of nutrients and hazardous substances) and improving the relevant policy and financial frameworks.

- Public outreach: difference in public understanding of water quality and what data shows, and how the public sees potential interventions (there are a million pollutants, some are concerning).
- Social impacts, including equity issues, upstream/downstream dynamics (also in terms of financing).
- Biodiversity/ecosystem impacts: fish migration, ecosystem services, etc.
- Emerging issues: floating plastic, microplastics, microbiological contamination, antibiotics.
- Other management instruments: UWWTD, Drinking Water Directive, Nitrates Directive, link to the WFD.
- Agriculture: not just water quality and quantity, but energy (pumping), types of pollution, different impacts in different settings (e.g., floodplains) IPCDR role in harmonizing sectoral approaches.
- Accident hotspots: cost-benefit analysis of prevention, source-based analysis.
- Reservoirs: Accumulation of pollutants and sediment in reservoirs is an issue.
- Groundwater pollution sometimes overlooked: groundwater to be considered as an ecosystem (groundwater ecology approach).
- Soil conservation, fine sediment issue.
- Promoting multi-purpose measures (water retention, floodplains), considering their nutrient retention potential.
- Consider nexus approach (food production, irrigation need, water demand, pollution, energy).
- Climate change: impact on quantity and quality.

### 3.5.3 Calls to action

- Global source-to-sea: more engagement with global initiatives that link source to sea management.
- Translate information to the public: investigative pilot projects, “translating” information.
- Align management and monitoring instruments: e.g. better links and harmonization between policies (Water Framework Directive, Drinking Water Directive, Urban Wastewater Treatment Directive, Common Agricultural Policy).

- Reach out to other sectors proactively, particularly agriculture.
- Assess the impact of the CAP revision: IPCDR and others to assess the impact of the CAP revision, and needs going forward.
- Include considerations for transnational coordination in all projects.
- Stronger attention to be granted to groundwater.
- Construct plans in ways that can adapt to emerging issues (e.g., chapter on emerging pollutants that can be updated as situations evolve).
- Build the case for preventative measures for pollution accidents using cost-benefit analysis.
- Shift to source-based framing and regulation (informed by better source-based analysis).
- Narrow knowledge gaps, build a science-policy interface.

### 3.5.4 Summarizing messages:

1. Data gaps: Important data gaps to be filled between scientific understandings of pollution issues and legislative aspects (e.g., groundwater, accident prevention).
2. Alignment with different directives and management mechanisms.
3. Engagement with other sectors, including agriculture.
4. Public engagement: Further public engagement around pollution is crucial, but the “how” deserves careful consideration.
5. Social and ecosystem impacts: pollution impacts can highlight equity aspects.
6. Bring forward less visible dimensions of pollution and adjust to emerging issues: groundwater, microbial pollutants, microplastics, etc.
7. Take into account climate change impacts.

**Irene Lucius, WWF CEE**, stated that many harbors are not equipped to handle pollution from cruise ships.

**Gerhard Nagl, Danube Environmental Forum**, stated that pesticides impact biodiversity. Also, transboundary water bodies and ground water are affected by pollution from agriculture.

**Adam Kovacs, ICPDR**, added that taking into account reporting on groundwater bodies will put a burden on countries. A project already developed how to equip harbors and the Danube Commission is best to deal with this.

**Vania Ivanova, BAS**, stated that science for regions is important to deal with quality and scarcity of water

**Susanne Brandstetter, PP EG ICPDR**, stated that the communication of the most important issues like pollution is very important.

**Igor Liska, ICPDR**, stated that groundwater data can be found in the national plans and the JDS4 report.

**Zinovi Broyde, Centre "EcoResource"**, stated that digitalization becomes important for the Danube basin.

### 3.6 Thematic Area 2: Hydromorphological Alterations & Integration Issues (Flood Risk Management, Hydropower, Nature Protection, Navigation, Agriculture)

- Hydromorphological conditions play an important role in the functioning of aquatic ecosystems and are therefore important elements with regard to water status. Undisturbed hydromorphological conditions are not only important in relation to habitats, but also for the reduction of nutrient concentrations, adaptation to climate change, and for managing the risk of water scarcity and droughts.
- The following three key hydromorphological alterations of basin-wide importance have been identified, considering sequence of hydromorphological quality elements in the WFD: a) Hydrological alterations (including impounded river sections, water abstractions and hydropeaking), b) Interruptions of longitudinal river continuity and sediment balance alterations, and c) Morphological alterations (related to river morphological alteration itself or to the disconnection of wetlands/floodplains).

#### 3.6.1 Questions Posed

- Do you see any important hydromorphology-related challenges that are not yet sufficiently covered in the draft DRBMP Update 2021?
- Do you see a need for additional basin-wide activities to be initiated or supported by the ICPDR to address hydromorphological alterations?
- Which specific measures would you suggest to further enhance the cooperation and coordination with relevant sectors like flood risk management, navigation, nature protection or hydropower, for the sustainable management of the Danube Basin's waters?

#### 3.6.2 Highlights of the Discussion

Presented by: **Anna Smetanova, GWP CEE**

- Hydromorphological conditions are to be tackled jointly in the integrated water management. Hydromorphological pressures and measures have multiple feedback loops with longitudinal and lateral management of land and catchments and are closely linked to socio-economic processes. Therefore, hydromorphological conditions should be tackled jointly in integrated water management.
- Multiple factors hinder the implementation of hydromorphological measures. Factors influencing the process of implementation are multiple (conflicting) interest, low institutional capacity to implement projects, agricultural practices and water use, and challenging cross-sectoral cooperation. Often, their effect on the processes is not clear. Analyzing the process and tackling challenges of implementation channel the improved implementation.
- Hydromorphological aspects linked to ecological corridors. Ecological corridors, which are embedded in the new EU Biodiversity Strategy, are a transboundary issue. Together with green measures, their implementation should be supported not only locally, but mainly at river basin level (regional approach). Transboundary green and blue measures including all actors and general public may necessitate support. Multipurpose prioritizing of ecological function and habitat connectivity should be always favoured over accounting for simple length of a reach.

Migration routes and habitats for sturgeon and other migratory fish should be part of multipurpose prioritization.

- Biodiversity reserves within the Danube catchment enable the improvement of ecological status within the planning cycle level. The reserves are important cornerstone for climate resilience building and tackling the neo-biota species spread. Yet, data gap exists on species extinction in rivers with good ecological status. The link to Biodiversity Strategy creates opportunities to understand the data gap and implement win-win measures leading to ecological restoration.
- Paradigm shift from grey to green and nature-based solutions has been initiated and it needs to be supported. The paradigm shift should be supported by capacity building activities and co-creation of new narratives. They should use appropriate and accessible language and be targeted across sectors and age groups of actors.
- Transdisciplinary discussion and ICPDR-fed research should seek common solution on cumulative pressures Scientific based applicable solutions targeting drought, nature-based solutions, win-win measures, and integrated measures needed to be developed. They should answer practical implementation issues and their wide application need to be ensured. Transboundary aspect should be considered in communications with stakeholders.
- Observe the existing and potential link to existing and emerging funding sources. Such calls include Green Deal, Green Recovery, CAP, Just Transition and other EU funding linked to implementation of EU Biodiversity, Climate Adaptation and other strategies. For agriculture, CAP payments need adjustments to incentivize required land use change. Foresee CAP 1st pillar direct payments for water retention on arable land and amend land use regulations to support water retention on agricultural lands. From the CAP second pillar, we would need WFD compensation schemes in case there is an obligatory restriction due to restoration or conservation measures according to the WFD.

### 3.6.3 Calls to Action

- Develop an action plan for improving the process of measures implementation already within the next planning cycle. Analyzing the drivers enabling rapid implementation and the obstacles slowing own the process that leads to the adoption of action plans, which enable speeding up the implementation within the next planning cycle.
- Improve the current knowledge-base on small hydropower planning and regarding the potential increase of hydropower in energy portfolio of countries.
- Prepare “pipeline projects” for incoming funding opportunities based on integrative approach. Preparing longitudinal and lateral projects at operational level generally takes a long time and requires joint efforts. Starting in advance enables reacting on emerging funding opportunities.
- Continue developing practical guidelines on green measures and nature-based solution application in tackling ecological and hydromorphological challenges. The use of those measures should be promoted on all levels. Explicitly, it is important to promote them on supra-regional level and in transboundary areas.

- Support the management of conflicts rooted in past hydromorphological alterations. Past hydromorphological alterations have legacy effects on the current status of water bodies. In many cases, win-win solutions could be found. A special focus and conflict management approach is required in areas, where improvement is needed and win-win solution are not apparent or not applicable.
- Prepare common guidelines for issues related to agriculture and land ownership. Multiple effects of agricultural management on land and water makes it a significant leverage point for river basin management. This means that even a small improvement in land management can have many benefits on water, ecosystems, water security in landscapes. Agricultural management is often an obstacle to implementation of measures. Therefore, special attention and guidance is needed for cross-sectoral cooperation, and land ownership. Furthermore, opening of public debates and facilitated governance dialogues are needed.
- Choose holistic approach when considering the nexus between water body status and biodiversity. Water sector should be involved in the implementation of the Biodiversity Strategy. Special caution should be paid, when defining what improving of biodiversity means in different water body and river types. The focus on species ecosystem function should be balanced with the demand on increasing biodiversity, and effect of invasive species on river systems should be considered.
- Seek common solution and synergies with societally relevant and water related issues such as water scarcity and drought. Always select integrated and win-win measures where feasible.
- Support consequent respecting of principle of non-deterioration on sub-national level. Examples were given where on sub-national level, the local political will or stakeholder interests are prioritized over the goals of the management plans.
- Continue well designed data collection and monitoring as base for effective discussion for projection of impact assessment and status development.
- Include Danube Transnational Programme Danube Floodplain project results into the plans and present/identify all potential floodplains for restoration, including one on agriculture lands. It helps to define the pathway for next steps and develop the pipeline projects for floodplain restorations.

### 3.6.4 Summarizing messages

1. Increase the level of ambition in integration issues, working closely with the relevant sectors, including agriculture and the general public.
2. Improve public communication by explaining how people can profit personally from measures such as restoration and environmental protection measures. Use appropriate language and terminology.
3. Increase funding available for hydromorphological issues at the level similar to investments targeting pollution.



4. Share the financial burden for projects with international / basin wide benefits.
5. Support projects addressing more than one objective (seeking for synergies).
6. Focus on improvement of existing status and preventing further deterioration of water status. Properly assess new projects.
7. Talk more about solutions and potential instead of (only) problems. It is time for action!

**Gerhard Nagl, Danube Environmental Forum**, stated that building of green corridors is good, and also in light of the plan to build new 1,300 hydropower plants, ICPDR guidance on hydropower has to be revised towards biodiversity and restoration.

**Calin Dejeu, Declic**, stated that the building of a dam in a Romanian river is affecting the connectivity of one of the last free flowing rivers in Romanian Carpathians

**Irene Lucius, WWF CEE**, stated that capacity building with authorities is important.

**Peter Gammeltoft, DSTF** stated that there is a perception that green measures are local measures.

**Laurice Ereifej, WWF CEE**, stated that agricultural land should not be a No-Go area but CAP Pillar 1 funding should be used for water-related compensation.

### 3.7 Thematic Area 3: Objectives and measures of Flood Risk Management Plans

- Floods are natural phenomena and can appear anywhere at any time throughout the entire river basin. They can become disasters when affecting humans, damaging property and infrastructure, or even cause injuries or casualties.
- The most important principle in the international ICPDR Danube Flood Risk Management Plan Update 2021 (DFRMP) is the solidarity principle, which guarantees that regions located downstream within the basin are not negatively affected by measures that were adopted in the upstream part of the watershed and vice versa.
- The draft DFRMP Update 2021 in chapter 5 (and Annex 2) refers to the strategic basin-wide level measures to prevent and reduce damage to human health, the environment, cultural heritage, and economic activity. In the framework of their prioritization, those measures were favored which are sufficiently robust to the uncertainty in forecasting of climate change impacts.

#### 3.7.1 Questions Posed

- Are there important challenges or processes that are not yet sufficiently covered in the draft DFRMP Update 2021 at the international level and how should they be better addressed?
- Are there measures missing or need to be enhanced and/or supplemented in the draft DFRMP Update 2021?
- Are you satisfied with the coordinated development of the FD and WFD planning documents?
- Do you recommend any additional good practices or information that should be highlighted in the draft DFRMP Update 2021?



### 3.7.2 Highlights of the discussion

Presented by: **Sabina Bokal, GWP CEE**

#### 1) *NBS/Green measures in FRMP*

ICPDR approach: Chapter on NWRMs to promote water retention as combination of natural retention measures (for smaller flood events) and flood retention measures (for larger flood events).

Strong emphasis on promoting green measures exists but there is room for improvement:

- a. Better explained benefits and efficiency of these measures for flood protection.
- b. Further support research projects or network (e.g. conference) of institutions which would research further cumulative effectiveness of NBS on basin wide level.
- c. Improve communication and promotion of the measures continuously and add concrete examples of already implemented green measures in the Danube Basin.

#### 2) *List of measures*

- List of measures is like a shopping list. No information on how these measures is coordinated and implemented in practice.
- Progress achieved in implementing these measures / evaluating the progress made.

#### 3) *Coordinated development of the FD and WFD planning document*

- Significant increase in coordination and cooperation between FRMP and RBMP but with different experiences on the national level (**subsidiarity**).
- Need for better integration of different directives/frameworks: flood protection, habitat directive, Natura2020, RBMP, ...

#### 4) *Upstream – downstream cooperation*

- Transparency of measures; Annex 4 covers bilateral agreements where measures that will have potential down/upstream effects are consulted and agreed.
- Solidarity principle is important principles of the plan. It is well established in the countries.
- Measures along bordering or trans-boundary rivers need to be negotiated and agreed upon in the frame of bilateral river commissions, not in the frame of ICPDR.

#### 5) *Cross-sectoral cooperation*

- Better cooperation/coordination on cross-sectoral level when implementing measures (spatial planning, building regulation, emergency management, agriculture, forestry, environment, etc.).
- Spatial planning sector need to be included in the whole process.
- Better incorporation of the agricultural sector where farmers would offer their agriculture area for retention areas.

#### 6) *Role of the ICPDR*

- The role of the ICPDR is a coordinating one. The decisions on the implementation of the Floods Directive (FD) rest with the contracting parties and cannot be solved at ICPDR level.
- Based on national data, the ICPDR achieve a common approach and method to delineate and publish the areas of potential significant flood risk as well as the flood hazard and risk maps.
- The implementation of the FD and support of EU funded projects highlight the need for a harmonized data set on hydrological and hydraulic base data and basin-wide project results. A Danube Hydrological Information System is in its setup phase.
- There is a strong focus of ICPDR on international cooperation projects which brings added value also to the countries.

### 3.7.3 Calls to action

#### *More knowledge:*

- Knowledge on benefits and efficiency of NBS for flood protection needs to be systematically collected, evaluated, and assessed and better communicated to the stakeholders.
- The ICPDR could support research projects or network (e.g., conference) of institutions which would research further cumulative effectiveness of NBS on basin wide level.

#### *Efficient communication:*

- To add concrete examples of already implemented green measures in the Danube Basin.

#### *Better communication*

- To increase the understanding and awareness as to why this coordination supports better implementation by avoiding conflicts and implementing win-win solutions. It's much more than "selling information" to the public, it's about to show what we share interests. We need to show that the issues we care about are "win-win" situations.
- To be added: a simple summary/table how different measures are implemented/included in the national plans.
- More efforts towards better evaluation of the progress with implementation of measures.

### 3.7.4 Summarizing messages

- 1) Relevant challenges and processes are incorporated in the plan.
- 2) Synergies by implementing NWRM, NBS with the implementation of the WFD, CC Adaptation Strategy, Biodiversity Strategy, etc. shall be better promoted.
- 3) Some extra effort is needed (e.g., executive summary) to make the DFRMP Update 2021 better understandable, especially for the general public.
- 4) Cooperation/coordination and integration of all relevant sectors is the key element of reducing flood risk in a sustainable way.

**Clemens Neuhold, ICPDR Flood Risk Expert Group Chair** stated that awareness raising is done on basin, regional and national level.

**Igor Liska, ICPDR Secretariat**, supported the statement.

### 3.8 Thematic Area 4: Support to implement both plans, Financing of the measures

- Implementation of specific measures in both plans are national responsibility with a support of various European (structural/cohesion funds, CAP, LIFE etc.) and international funding possibilities. A variety of funding Instruments are available for the financing of measures for this planning cycle (see chapter 8.5 and in more detail Annex 20 of the draft DRBMP Update 2021).
- At Danube basin-wide level, the draft DRBMP Update 2021 includes a “Joint Programme of Measures” in chapter 8 containing measures of basin-wide importance related to the “Significant Water Management Issues” at the Danube level. The general list of measures stipulated in the JPM should be driven by a cost-benefit approach in the national plans.

#### 3.8.1 Questions Posed

- What are new financial challenges and bottlenecks that need to be addressed in the draft DFRMP and DRBMP Updates 2021?
- What funding opportunities presented in the draft DRBMP Update 2021 do you consider to be the most important ones?
- Are there any other adequate instruments to finance the measures in both plans, which are not yet addressed in the draft DRBMP and DFRMP Updates 2021?

#### 3.8.2 Highlights of the Discussion

Presented by: **Konstantin Ivanov, GWP CEE**

- Implementation of specific measures in both plans are national responsibility with a support of various European (structural/cohesion funds, CAP, LIFE etc.) and international funding possibilities. A variety of funding Instruments are available for the financing of measures for this planning cycle (see chapter 8.5 and in more detail Annex 20 of the draft DRBMP Update 2021).
- Considerable investments have been made in the previous years, particularly in the field of urban and industrial wastewater collection and treatment and agriculture. Also, a number of Danube countries and the relevant sectors have taken measures in previous years regarding improvements of hydro morphology (river continuity, fish migration/fish passes etc.) and plan further ones in the future (see Annex 17 of the draft DRBMP Update 2021).
- At Danube basin-wide level, the draft DRBMP Update 2021 includes a “Joint Programme of Measures” in chapter 8 containing measures of basin-wide importance related to the “Significant Water Management Issues” at the Danube level. The general list of measures stipulated in the JPM should be driven by a cost-benefit approach in the national plans.

- Main funding programmes are already captured in the draft DRBMP Update 2021, Annex 20 (e.g., EU OPs, Green deal, CAP, Green bonds, DTP/Life/Horizon, IPA 3, EIB, NDICI, EBRD...).
- Some additions mentioned that will be checked/integrated during the revision of the draft plan.
- Proposals made for strategic improvements of the financing situation in the future (better implementation of the polluter-pays principle, strengthening the use of CAP funding for water management, consideration of integrated projects etc.).
- Despite funding opportunities, there is a lack of a pipeline of multi-benefit/restoration project proposals.
- Interlinkage between water quality and health is an issue that needs to be further investigated and integrated into water management planning in the future.

### 3.8.3 Calls to action

- Strengthen the use of CBA (Cost-Benefit-Analysis) at project level.
- Increase capacity at national/regional level for the development/selection of projects.
- While transboundary cooperation is already fruitful, show the benefits of upstream-downstream innovative financing through smaller scale projects.

### 3.8.4 Summarizing messages

- 1) The recovery funds offer significant additional funding opportunities; to be used wisely - use of the Do No Harm principle when planning/executing new projects (esp. for flood protection), e.g the Recovery and Resilience Facility in some countries.
- 2) Need to prioritize projects offering multiple benefits (e.g including ecosystem services related benefits). Nature-Based Solutions is a useful approach for this.

**Irene Lucius, WWF CEE**, stated that it is important to make sure high-level governments are interested in water management issues.

**Cristian Rusu, Romanian Waters**, stated that important green measures should be combined with grey ones, for example for flood protection and compensation should be taken into account.

**Zinoviy Broyde, Centre "EcoResource"**, stated that Prut and Siret rivers are the last river in the Danube basin that have no basin management, nor flood plans and project proposals for financing this were unfortunately rejected.

### 3.9 Thematic Area 5: Communication and Public Participation

- Article 14 ‘Public Information and Consultation’ of the EU Water Framework Directive instructs “to encourage the active involvement of all interested parties in the implementation of the Directive”. Public information and consultation are also stipulated in Articles 9 and 10 of the EU Floods Directive. At the ICPDR, however, raising awareness and wider informing our stakeholder groups goes far beyond simply meeting legal obligations. Public consultations facilitated by the ICPDR at the basin-wide level pursue public participation through 5 key activities:
  1. Direct collection of comments, including observers & other stakeholders,
  2. Stakeholder consultation workshop,
  3. Social media campaign (#HaveYourSay, #OurOpinion#OurDanube),
  4. Online questionnaire,
  5. Dissemination of information via website dedicated page, Danube Watch.
- The EU Floods Directive (Articles 6 & 10) also requires public access to the preliminary flood risk assessment, the flood hazard maps, the flood risk maps and the flood risk management plans.

#### 3.9.1 Questions Posed

- When it comes to communication and public participation, it is important to work towards making a good and sound basic relevant knowledge accessible to all. Taking especially into account a “non-technical audience”, is the set of technical documents and communication materials provided sufficient, and what are the remaining information gaps to making this knowledge more accessible?
- Who are the most important target audiences for the development of the DRBMP & DFRMP Updates 2021? Who will be the most important target audiences for communication and public information efforts during the implementation of the plans (2022 to 2027)?
- What communications measures are planned for the implementation period 2022 – 2027 as per the draft DRBMP & DFRMP Updates 2021? If anything, are there vital measures missing?
- The draft DRBMP & DFRMP Updates 2021 cite a desire to both “inform the public” and “be informed by the public” with regards to implementation of the plans. What new channels could the plans include to encourage greater public participation during the implementation period 2022 – 2027, and what will be needed for their implementation?

#### 3.9.2 Highlights of the Discussion

Presented by: **Jergus Semko, GWP CEE**

a) *Accessibility and understandability of the ICPDR Plans*

- Everyone agrees that accessibility and comprehensibility of the plans and related documentation by the general public should be prioritized during future plans.

- There is plenty of knowledge, but it's hard to know where to find it: the accessibility of content is the real challenge
- It is essential for people to be able to relate to our messages. The ICPDR has great technical documents but need to work on more public-oriented texts.
- Solutions need to be found on how to make our work easily consumable and “light weight”. The only type of information that will have an impact is not technical but general. Using messages such as: ‘how to save water or how to have an impact on water-related issues, rather than for instance describing engineering utilities for flood protection.
- Brochures, videos, and other attractive forms of communication that people prefer should be utilized.

b) *Local language adaptation*

- Local translations are imperative in order for non-English speakers to be able to use our “products”. We need to translate the plans into national languages – or at least offer a concise translation of the key messages.
- We need as many people to work with us as possible. However, without understanding us, the messages won't get across and our efforts will hit a wall and cease to progress.
- By adapting our messages, we can reach more people. And people usually become sensitive if they are directly affected.

c) *Materials need to be written in a user-friendly way:*

- Complex formulation and communication might be another obstacle.
- We should keep in mind who the audience is. People may not understand very technical speech prior knowledge or some degree of pre-existing interest.
- Cooperation between science and communication personnel goes a long way when formulating messaging.

d) *Clear definition of the target audience and the way how to reach them*

- Knowing exactly who we are dealing with, how and where they communicate, and what we can deliver to them is essential for successful cooperation.
- Limiting communication to email is not enough. Social media channels such as Facebook, Twitter, Instagram and LinkedIn are becoming increasingly important.

e) *Tailor-made messaging*

- An example from was given to showcase targeting and adaptation of communicated messages.
- A tailor-made approach was utilized when compiling invitations for their event that helped them attract more stakeholders.
- Adapting the message to a specific group keeps the group's motivation high.

- f) *Communication is a “return on investment”*
  - Sometimes it is unclear for stakeholders why more money should be invested in water-related projects. Communication efforts can be an effective way to confirm the investment in something that might not affect the audience directly but has a huge impact on the region where the impacted stakeholders live, or the communities they are a part of.
- Good communication needs investment – we are returning the money to the people who are giving it, when we communicate well, we make sure everyone is informed, this is a return on investment.
- g) *Danube is “within our folklore”*
  - Many people associate the Danube with some sort of folklore, and romantic-like setting.
- We need to make people think about the Danube as a part of their everyday life, that has far greater impacts on the environment and which involves them as well.
- Children and youth can be reached with the ‘folklore’ aspect and with events such as Danube Day and Danube Art Master. They are an important target group; more work needs to be done in this direction. But we also need to reach out to citizens of all age groups.
- h) *Need for “hooks” to get the public interested*
  - Following trends is useful in every sector. These “hooks” can be quite easy to spot and to follow. In case of water related issues, the next big thing is definitely climate change catastrophes and rapidly increasing microplastics pollution.
  - Quickly reacting to latest interests of our target groups can secure their increased support and ensure better chances of receiving funding for projects and activities.
  - Finding a correlation between ‘message offer’ and ‘information demand’ proves beneficial in many ways.
- i) *Biodiversity should be added to the discussion*
- The importance of bringing biodiversity to the spotlight as this is what keeps us alive was emphasized.
  - This topic could be discussed with people from hydropower, marine navigation, and agriculture sectors as their projects influence the aquatic ecosystems greatly.
- j) *We need to connect conflicting interests from different sectors*
- Often, two or more conflicting interests from different sectors fight for their interests in the same region.
- The question is how to reach consensus for the greater good.
- k) *Who will be the driver?*
- The deficit of specialized comms personnel remains an issue.

- More communications people are needed to shape our speech and get the messages across.
  - l) *There's a need for private sector involvement*
- Even though the private sector has specific needs and their motives might be different from those of the water sector, they prove to be valuable support and source of financial security for upcoming projects.
  - m) *The agricultural sector is our next big target*
- The agricultural sector should be at least one of our primary target groups.
- All stakeholders agreed that this sector has huge influence or impact on water issues and that we need to work more with them.

### 3.9.3 Calls to Action

- Sell the messages better: Adapting our messaging goes a long way when trying to get the attention of stakeholders and get them onboard. Use infographics.
- Establish a COMs taskforce: A form of communication taskforce could be created to work together in order to spread important messages more effectively.
- Plan ahead and use the time to get to know your audience better: Adequate time needs to be allocated for any message to be constructed according to any targeted audience.
- Create expert groups with diverse backgrounds to tackle complex problems: Expert groups have proven to be very effective when dealing with complex issues like new strategies or national policies. The whole network should be approached to localize appropriate specialists, willing to join forces and work on a common goal to achieve mutual benefits.
- Always stay professional: Every event or initiative that deals with stakeholders should be led by a professional moderator, representing the organizing entity.
- Make sure to listen to your audience and adjust to them: It is suggested to mix push and pull communication techniques to not just get your message across, but also to be responsive to your audience and listen to what their concerns and priorities are.
- Switch from “passive” to “active” communication methods: It is not enough to utilize one-way communication, or communication that neglects feedback. We need to be proactive and always seek ways how to connect with our audience on a deeper level.
- Go where your target groups are and find opportunities to meet them: Water-oriented organizations should start thinking about venues and places where their target groups will be likely to be found. For example, it is not enough to be present at a water-related symposium to attract agriculture stakeholders. Water-oriented organizations would in this case need to focus on agriculture fairs and similar events to effectively target their desired stakeholder groups.



- When organizing stakeholder workshops – send different invitation letter for the same event to make sure that everyone gets their sectors covered.
- Use help of the observers to get messages across: Partnered organizations usually share goals or are eager to support a good cause. Asking for help in promoting of a given message goes a long way.
- Communicate frequently and reply swiftly: This applies especially in a digital sphere of communication. It is very dynamic, and people require instant reactions. A frequent communication is necessary to keep the momentum, and swift replies help maintain and develop an organization’s reputation.
- Make citizens fall in love with our work: People follow what they love – and what affects them. Water-related organizations need to identify the current trends and issues people care about to be able to attract and expand their base of followers and supporters.
- Use your network to reach more people: A network of partners, members, or followers of a given organization should, in this case, be seen as an extension of possible promotion. These stakeholders can usually reach audiences that would otherwise remain inaccessible.

### 3.9.4 Summarizing messages

- 1) The 3 pillars of “Cleaner, Healthier, and Safer” represent pivotal points of the future communication.
- 2) “Popularize the plans”.
- 3) You “can’t spend water twice”: you need to know – On the farmers? On the sturgeons?
- 4) It is imperative to involve younger generations.
- 5) The agricultural sector needs to be brought on the table.
- 6) There is a capacity issue: too few people for COMs.
- 7) Make it clear that you’re a partner for the public.
- 8) People are more interested in topics that relate to them.
- 9) Converting national questions to local ones helps securing support among people.
- 10) Positive framing – make sure to always present win-win situations. The ‘win-win’ situation paradigm is a good one if the situation is not critical.
- 11) Water sector issues can only be solved in an integrated way with other sectors.
- 12) Search and present ‘hot topics’ such as: Climate change and Microplastics that get the public’s attention.

**Susanne Brandstetter, ICPDR Public Participation Expert Group Chair**, stated the importance of involving the young generation.

**Irene Lucius, WWF CEE**, stated that young people 18-30 years old are ready to act, they are needed as multipliers.

**Lotta Blaskovicova, Slovak Hydrometeorological Institute**, stated her experience from an Interreg project with schoolchildren in Hungary and Slovakia.

### 3.10 Annex 1: Agenda

## **Our Opinion – Our Danube ICPDR Stakeholder Consultation Workshop 2021**

29-30 June 2021, Online

*Agenda Day 1 (Tuesday, 29 June 2021)*

09:00 – 09:40 Participants gather in the Waiting Room

09:40 – 10:15 Session 1: Introduction to the Draft Plan Updates

- Introduction by moderator, Steve Chaid
- Keynote speech by ICDPR President, Momčilo Blagojević
- Introductory speech by ICDPR Executive Secretary, Ivan Zavadsky
- The “Voice of the Young Stakeholders”

10:15 – 10:25 Screen break (10 min.)

10:25 – 12:50 Session 2: Stakeholder Input

- Interim results and from the public consultation
- Statements from Stakeholders
- ‘Danube Café’ ○ Participants will be divided into 5 groups ○ All participants can #Have Their Say ○ Discussion of 5 Thematic Areas Important to the Plans

12:50 – 14:00 Lunch break (60 min.)

14:00 – 15:00 Session 3: Danube Café (cont’d)

15:00 – 15:10 Closing Day 1 of the Stakeholder Workshop

*Day 2 (Wednesday, 30 June 2021)*

08:30 – 09:00 Participants gather in the Waiting Room

09:00 – 11:10 Session 4: Danube Café Results

- Summary of Day 1 and Outlook of Day 2
- Danube Café – Results + Q&A from Day 1
  - Thematic Area 1: Organic, Nutrient and Hazardous Substances Pollution of Surface and Groundwater
  - Thematic Area 2: Hydromorphological Alterations & Integration Issues (Flood Risk Management, Hydropower, Nature Protection, Navigation, Agriculture)
  - Thematic Area 3: Objectives and Measures of Flood Risk Management Plans

10:25 – 10:30 Screen break (5 min.)

- Thematic Area 4: Support to Implement Both Plans, Financing of the Measures
- Thematic Area 5: Communication and Public Participation

11:20 – 11:30 Screen break (10 min.)

11:30 – 12:00 Session 5: We Discussed Danube

- Conclusions, next steps and closing of the Stakeholder Workshop
- Closing words from the ICPDR President

12:00 End of the Workshop

### 3.11 Annex 2: List of Participants

#	First Name	Surname	Organisation
1	Adam	Kovacs	ICPDR
2	Albena	Vatralova	Climate, Atmosphere and Water Research Institute -CAWRI at the Bulgarian Academy of Sciences -BAS
3	Albert	Scrieciu	GeoEcoMar
4	Alena	Kurecova	Water Research Institute
5			
6	Alessandra	Giolo	GWP
7	Alexander	Höbart	ICPDR
8	Aliona	Isac	RPC Eco Logistica
9	Amparo	Samper Hiraldo	World Bank
10	Anca	Finantu	Ministry of Environment, Waters and Forests
11	Andrea	Palasti	Danube Transformation Agency for Agency
12	Andreas	Beckmann	WWF-CEE
13	Andreas	Scheidleder	Umweltbundesamt - Environment Agency Austria
14	Anna	Smetanova	GWP CEE
15	Attila	Nagy	University of Debrecen
16	Aurelia	Tafta	Ministry of Environment, Waters and Forests - Romania
17	Balázs	Horváth	EU Strategy for the Danube Region, Priority Area 4 "Water Quality"
18	Biljana	Savić	JVP "Srbijavode"
19	Blaz	Pokersnik	Ministry of environmental and spatial planning
20	Borjan	Brankov	IAUS
21	Călin	Dejeu	Declic
22	CATANA	Daniela	Ministry of Environment, Waters and Forests
23	Chris	Fischer	Development
24	Clemens	Neuhold	Federal Ministry of Agriculture, Regions and Tourism
25	Corina-Cosmina	Boscornea	National Administration "Romanian Waters"
26	Cosmin	Feodorov	World Bank
27	Cristian	Rusu	RO Water
28	Cristina	Cuc	Ministry of Transport and Infrastructure
29	Cristina	Sandu	International Association for Danube Research
30	Daniela	Neubacher	Institut für den Donaauraum und Mitteleuropa
31	Daniela	Stojković Jovanović	NGO World and Danube
32	Darko	Barbalić	Hrvatske vode
33	Dejan	Trifunovic	The Danube Commission
34	Diana	Heilmann	EUSDR PA4
35	Dijana	Varlec	Croatian Chamber of Economy

36	Donka	Shopova	Climate, Atmosphere and Water Research Institute at Bulgarian Academy of Sciences (CAWRI-BAS)
37	Dragos	Ungureanu	National Administration Romanian Waters
38	Dušica	Bogdanović	Young Researchers of Serbia
39	Duška	Kunštek	MMPI
40	Edgar	Michahelles	KooKoo
41	Edith	Hödl	ICPDR
42	Eduard	Interwies	Intersus
43	Elena	TUCHIU	National Administration Romanian Waters
44	Elena	Ghita	WBG
45	Elena	Rajczykova	WRI Bratislava
46	Elisabeth	Bondar-Kunze	University of Natural Resources and Life Sciences, Vienna
47	Elvira	Marchidan	National Administration Romanian Waters
48	Emöke	Györfi	WWF Austria
49	Erhard	Busek	IDM - Institut für den Donauraum und Mitteleuropa
50	Erik	Harman	SVP
51	Erla	Gjinishi	GWPO
52	Eva	Juranová	T. G. Masaryk Water Research Institute, public research institution
53	Fabien	Techene	WWF Adria
54	Ferdinando	Didonna	Italian Speleological Society
55	Florica	Corobea	Ministry of Environment, Waters and Forests - Romania
56	Franz	Ueberwimmer	Regional Government "Land Oberösterreich"
57	Franz	Wagner	BMLRT
58	Gerd	Frik	VERBUND Hydro Power GmbH
59	Gerhard	Nagl	Danube Environmental Forum
60	Gerhard	Merches	Bund Naturschutz
61	Gertrud	Haidvogel	University of Natural Resources and Life Sciences, Vienna
62	Gheorghe	Constantin	ministry of Environment, Waters and Forest - Romania
63	Gordana	Grujic	OASIS
64	Grigoriy	Kykerchuk	Basin Management Water Resources Prut & Siret
65	Gusztáv	Csomor	Danube Transnational Programme MA/JS
66	György	Rátfai	Middle Tisza District Water Directorate Tisza Office
67	Heide	Jekel	German Federal Environment Ministry
68	Helene	Masliah	ICPDR
69	Helmut	Belanyecz	'österr. Kuratorium für Fischerei und Gewässerschutz für EAA
70	Helmut	Belanyecz	European Angler Alliance/ÖKF FishLife
71	Ida	Nagyné Sós	Ministry of Interior
72	Igor	Barna	Public ports, JSC
73	Igor	Liska	ICPDR
74	Igor	Stanković	Hrvatske vode

75	Ionel Sorin	Rindasu-Beuran	National Administration” Romanian Waters”
76	Irene	Lucius	WWF-Central and Eastern Europe
77	Irina	Cozma	PA3-SUERD
78	Iva	Sutic	Hrvatske vode
79	Ivan	Zavadsky	ICPDR
80	Ivana	Bajkovicova	Water Research Institute
81	Jana	Zatlakovičová	SVP, š.p. OZ Bratislava
82	Jana	Valachová	Slovak Water Management Enterprise
83	Jane	Korck	Bavarian State Ministry for the Environment and Consumer Protection
84	Janine	Schwalm	ICPDR
85	Jarmila	Trenčanská	The Ministry of Regional Development, Investments and Informatization of the Slovak Republic
86	Jelena	S.	Faculty of Science and Mathematics
87	Jelisaveta	Nikolic	JVP Srbijavode
88	Jergus	Semko	GWP CEE
89	Jovana	Bastić	ISRBC
90	Joze	Cvetko	Water agency association
91	Jozef	Hriva	Slovenský vodohospodársky podnik š.p. OZ Piešťany
92	Julie	Magnier	OiEau
93	Juraj	Staron	Ministry of Transport and Construction of the Slovak Republic
94	Katalin	Szabó	General Directorate of Water Management
95	Katarina	Mravcova	VUVH
96	Katarina	Jeneiova	Slovak hydrometeorological institute
97	Katarína	Kučerová	Water Research Institute
98	Kitti	Miklánné Szávai	Ministry of Interior
99	Konrad	Stania	BMLRT
100	Konstantin	Ivanov	Global Water Partnership Central and Eastern Europe
101	Lana	Deraković-Rakas	Ministry of the Sea, Transport and Infrastructure, Croatia
102	László	Balatonyi	EUSDR PA5 (Environmental Risks priority area)
103	Laurice	Ereifej	WWF CEE
104	LenaVioletta	Leitner	Dtafa (Universität für angewandte Kunst Wien)
105	Lidia-Lenuta	Balan	Geological Institute of Romania
106	Livia	Gisca	Administrația Națională „Apele Române
107	Lotta	Blašková	Slovak Hydrometeorological Institute
108	Lucia	Capatina	Tiraspol State University
109	Lucia	Ruffato	Coordinamento Nazionale Tutela Fiumi Free Rivers Italia
110	Ludmila	Strelkova	MŽP SR
111	Malvyna	Genych	Basin Management Water Resources Prut & Siret
112	maria	temelkova	BAS

113	Maria	Galambos	Ministry of Agriculture
114	Maria	Szomolanyi Ritvayne	Ministry of Interior, Department of RBM and Water Protection
115	Marian	Kucera	DHI Slovakia
116	Marie	Pfeiffer	WWF
117	Mariia	Shpanchyk	State Agency of Water Resources of Ukraine
118	Marija	Ivković	JVP Srbijavode
119	Marijana	Cindrić	MMPI
120	Marijana	Miletić-Radić	Jaroslav Černi Water Institute
121	Marina	Nenkovic Riznic	Institute of architecture and urban & spatial planning of Serbia
122	Marion	Zilker	Verband Kommunalen Unternehmen e. V.
123	Marta	Cermakova	Ministry of Agriculture and Rural Development
124	Marta	Mihailovic	Ministry of Agriculture, Forestry and Water Management - Republic Directorate for Water
125	Marta	Havlickova	Ministry of the Environment
126	Martin	Pusch	Leibniz Institute of Freshwater Ecology and Inland Fisheries (IGB), Berlin
127	Martin	Mišík	ALCEDO RIVER CLINIC s.r.o.
128	Martin	Goliaš	Public ports, JSC
129	Martina	Noitzmüller	ICPDR
130	Marton	Pesel	General Directorate of Water Management Hungary
131	Melinda	Szappanyos	University of Pécs
132	Merita	Borota	Ministry for Agriculture, Forestry and Water- Republic Directorate for Water management
133	Miklós	Szalay	General Directorate of Water Management
134	Miklós	Marton	Hungarian Government
135	Mile	Krstev	GWPO
136	Mirjana	Lenhardt	Institute for Multidisciplinary Research
137	Mirza	Sarač	International Sava River Basin Commission
138	Molly	Robbins	GWPO
139	Momčilo	Blagoević	Montenegro
140	Monika	Supeková	Slovak Water Management Enterprise, state enterprise
141	Natalya	Fulim	Department of ecology and natural resources, Zakarpattia Region
142	Nenad	Nikolic	Local Agenda 21 for Kostolac Municipality
143	Nike	Sommerwerk	Museum für Naturkunde Berlin
144	Nikoletta	Revallo	Tisza River Basin Water Resources Directorate
145	Nino	Wartmann	Pure Water for Generations
146	Norbert	Csatári	General Directorate of Water Management
147	Oksana	Metlashevskia	State Agency of Water Resources of Ukraine
148	Oleg	Rubel	DEF
149	Olga	Nitcheva	CAWRI at the Bulgarian Academy of Sciences
150	Olimpia	Negru	Ministry of Environment, Waters and Forests

151	Olivia	Tesic	Provincial Secretariat for Urban Planning and Environmental Protection
152	Ondřej	Ulrich	Mendel University in Brno
153	Otilia	Mihail	Ministry of Environment, Waters and Forests
154	Pascal	Roesler	Pure Water for Generations e.V.
155	Pavla	'Štěpánková	T. G. Masaryk Water Research Institute
156	Pavla	Pekárová	Institute of Hydrology, Slovak Academy of Sciences
157	Peter	Kovacs	Ministry of Interior
158	Peter	Gammeltoft	Danube Sturgeon Task Force
159	Peter	Ilcik	Ministry of Transport and Construction of the Slovak Republic
160	Petra	Repnik	Slovenian Water Agency
161	Petra	Csizmadia	EUSDR PA5 (HU)
162	Petrisor	Mazilu	National Administration Romanian Waters
163	PETRUTA	MOISI	Eco Counselling Centre Galati, Romania
164	PETRUTA	MOISI	CENTRUL DE CONSULTANTA ECOLOGICA
165	RADE	MARCETIC	PWMC Vode Vojvodine Novi Sad
166	Radosav	Rasovic	Freelance
167	Raimund	Mair	World Bank
168	Razvan	Bogzianu	National Administration" Romanian Waters"
169	Rianna	Gonzales	Global Water Partnership
170	Roman	Viorica - Dana	INCD GEOECOMAR
171	Roman	Lunda	Ministry of the Environment of the Czech Republic
172	Rosie	Oakes	Met Office (UK)
173	Ruxandra	Balaet	Ministry of Environment, Water and Forests
174	Sabina	Bokal	GWP CEE
175	Sandra	Rajcic	ICPDR
176	Sanja	Genzić Jurišević	Ministry of Economy and Sustainable Development
177	Sanja	Ruzin	Public water management company "Vode Vojvodine"
178	Sanja	Simonović Alfirević	IAUS
179	Sanja	Pantelic-Miralem	PWMC Vode Vojvodine Novi Sad
180	Silvia	Csobokova	Ministry of Transport and Construction of the Slovak Republic
181	Solmaz	Farhang	DTAFA
182	Sonja	Behr	'ÖKF Fishlfife / European Anglers Alliance
183	Stefan	Ossyssek	WWF Germany
184	Stefania	Viszlaiová	Slovenský Vodohospodársky Podnik
185	Stefanie	Berg	Bayerisches Landesamt für Denkmapflege
186	Steve	Chaid	ORF
187	Stoyan	Mihov	WWF Bulgaria
188	Susanne	Brandstetter	BMLRT

189	Suzana	Alcinova Monevska	Hydrometeorological Service of the Republic of North Macedonia
190	Svitlana	Rebryk	Tisza River Basin Water Resources Directorate
191	Sylvia	Koch	ICPDR
192	T.	Hacksteiner	European Barge Union EBU
193	Tamás	Gruber	WWF Hungary
194	Tana	Bertic	Sava Youth Parliament
195	Thomas	Schneider	City of Ingolstadt
196	Thomas	Fiebiger	Golding Capital Partners
197	Thore	Gauda	Bavarian State Ministry of the Environment & Consumer Protection
198	Tobias	Schäfer	WWF Deutschland
199	Tristan	Bath	ICPDR
200	Valentyn	Voloshyn	RTO Zakarpattia
201	Valeria	Wendlova	Slovak Hydrometeorological Institute
202	Valeriya	Gyosheva	Danube River Basin Directorate
203	Vania	Ivanova	European Commission
204	Verena	Wieser	Pure Water for Generations e.V.
205	Veronika	Koller-Kreimel	IAD
206	Veronika	Vagoova	GWP CEE
207	Vesna	Jakovljevic	Organisation for Saving Nature and Animals - OSNA
208	Vesna	Jakovljević	OSNA
209	Vogel	Baerbel	German Speleological Federation
210	Walter	Reckendorfer	Verbund
211	Wolfram	Mausser	Ludwig-Maximilians Universität München
212	Xaver	Schruhl	Deutsche Lebens-Rettungs-Gesellschaft, Landesverband Bayern
213	Yelysaveta	Demydenko	GWPO
214	Željka	Kordej-De Villa	The Institute of Economics, Zagreb
215	Zinoviy	Broyde	Centre "EcoResource"
216	Zoran	Major	ICPDR
217	Zoya	Mateeva	Climate, Atmosphere and Water Research Institute at Bulgarian Academy of Sciences
218	Zsuzsa	Steindl	GWP Hungary Foundation



### 3.12 Annex 3: List of Facilitators & Rapporteurs

<i>Thematic Area Team Name</i>	<i>Facilitator</i>	<i>ICPDR Support</i>	<i>PP EG Support</i>	<i>GWP Rapporteur</i>	<i>Miro Artist</i>
<i>TA1 – Pollution</i>	Elena Tuchiu (PM EG)	Adam Kovacs	Ida Nagyné Sós	Molly Robbins	Alessandra Giolo
<i>TA2 – Hydromorphology</i>	Jane Korck (RBM EG) & Petra Repnik-Mah (HYMO TG)	Edith Hödl	Thore Gauda	Anna Smetanova	Rianna Gonzales
<i>TA3 – Flood Risk</i>	Clemens Neuhold (FP EG)	Igor Liska	Alena Kurecova	Sabina Bokal	Yelisaveta Demydenko
<i>TA4 – Financing</i>	Cristian Rusu (ECON TG)	Eduard Interwies	Monika Supekova	Konstantin Ivanov	Mile Krstev & Erla Gjinishi
<i>TA5 – Public Participation</i>	Susanne Brandstetter (PP EG)	Hélène Masliah-Gilkarov	Sanja Genzic-Jurisevic	Jergus Semko	Veronika Vagoova

Special thanks to:

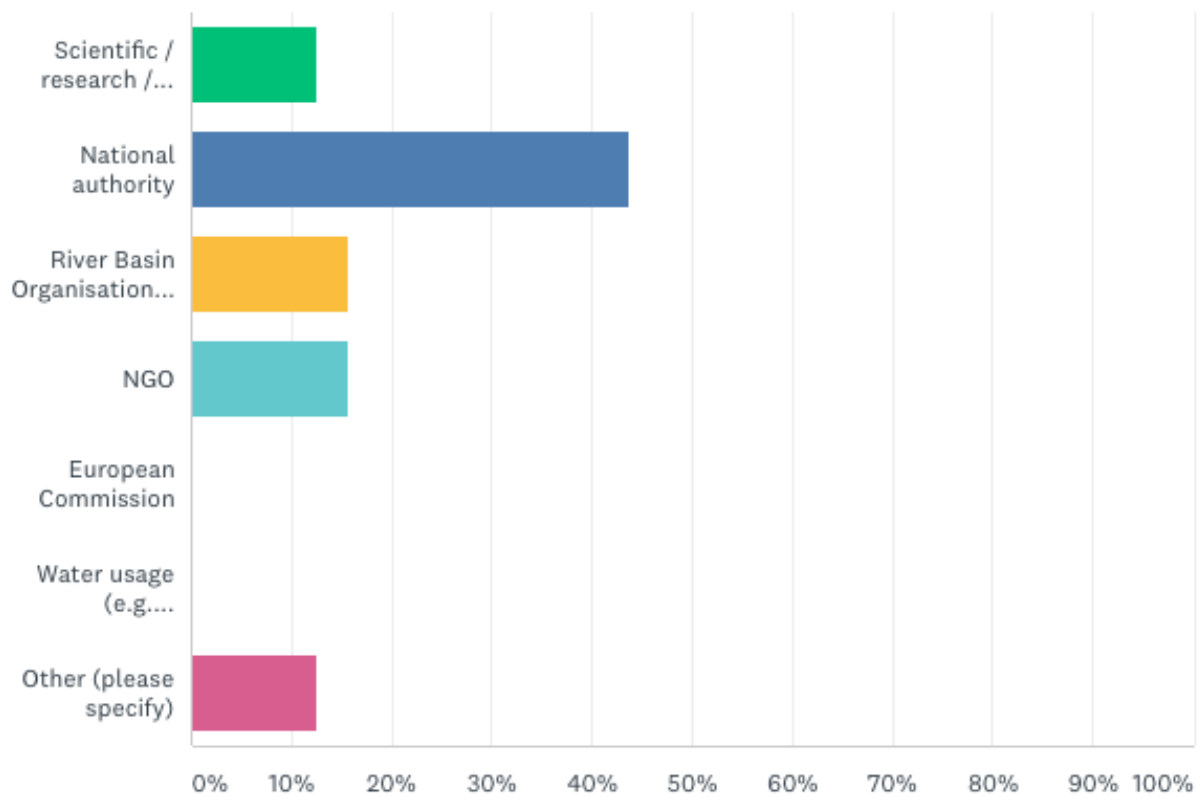
- Mario Lamban, GWP for technical support.
- Tristan Bath & Sandra Rajcic, ICPDR, for coordination and general support.

### 3.13 Annex 4: Post-Workshop Satisfaction Survey Results

Number of respondents: 32

Platform used: Survey Monkey

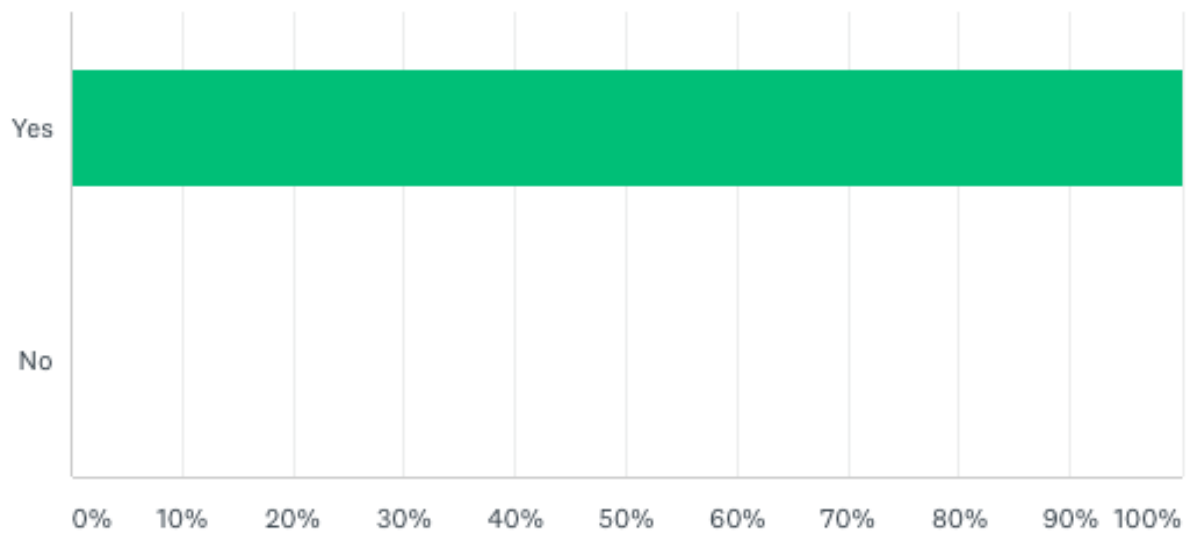
#### 3.13.1 Question 1: Which sector do you represent?



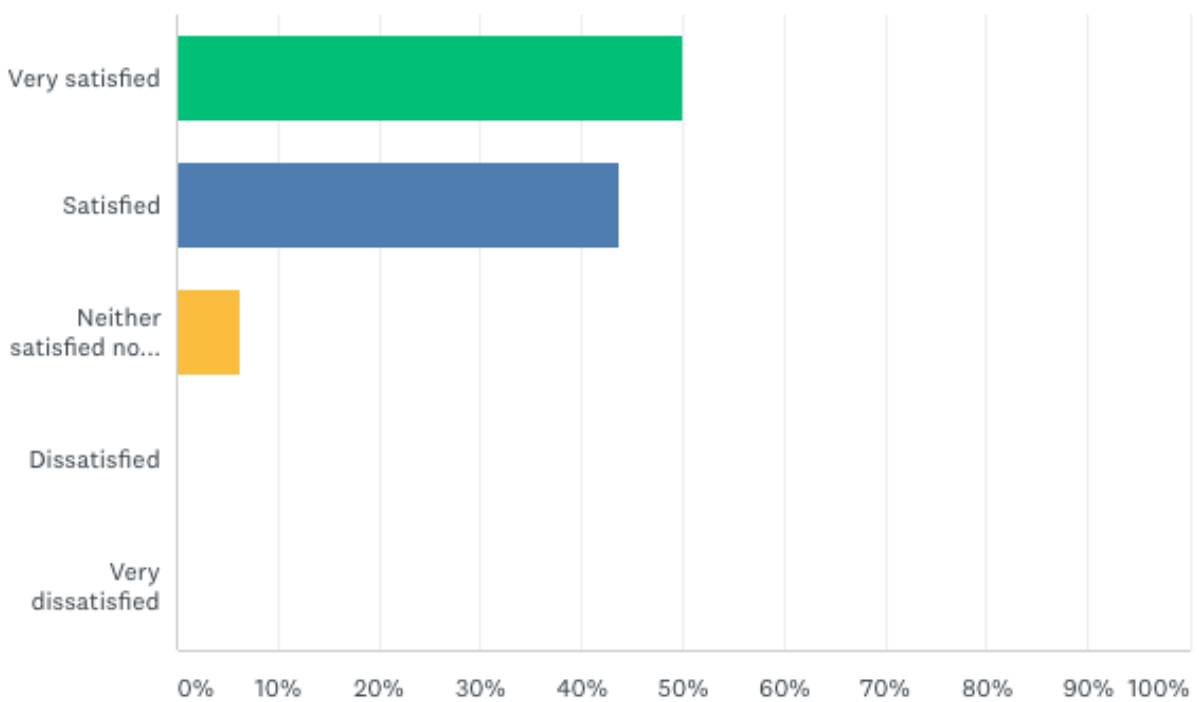
“Other” Responses:

- Business association
- Public water management company
- Freelance expert for climate change and water protection
- Consulting

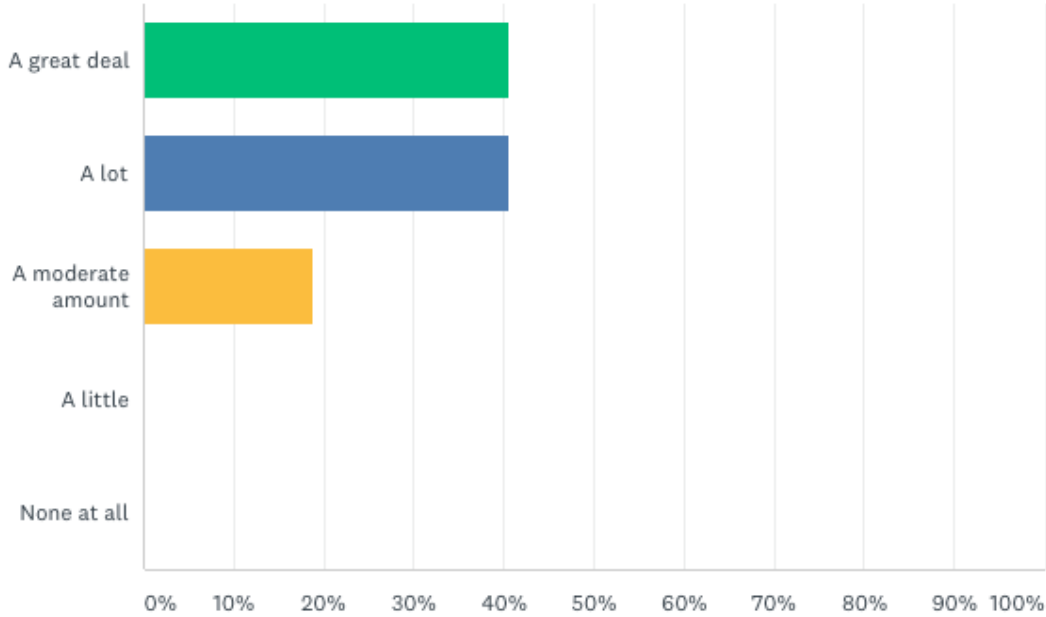
### 3.13.2 Question 2: Do you feel you got to have your say?



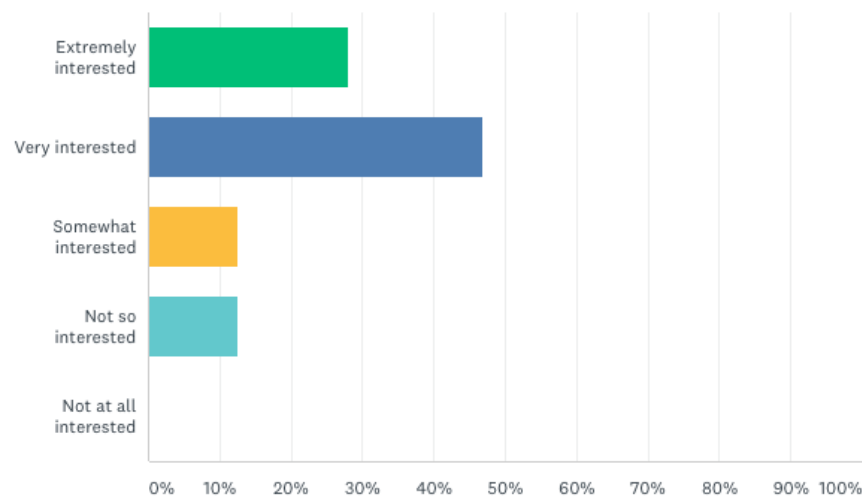
### 3.13.3 Question 3: Overall, were you satisfied or dissatisfied with the workshop?



### 3.13.4 Question 4: Were you happy with the Danube Café Breakout Session format?



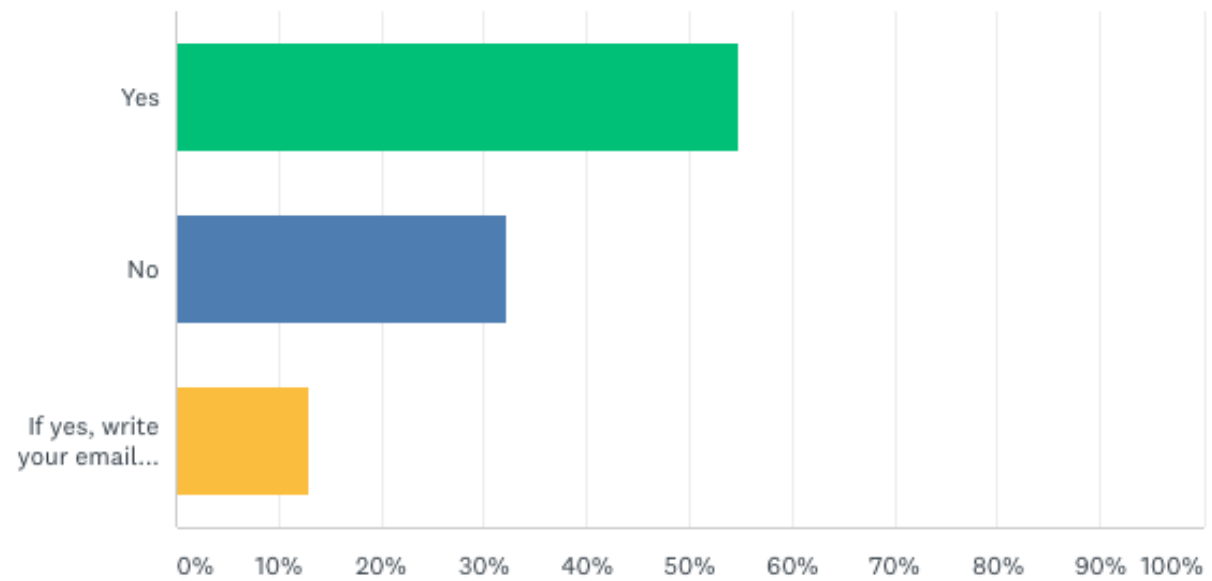
### 3.13.5 Question 5: How would you feel about continuing the conversation and attending workshops such as this more regularly than once every six years?



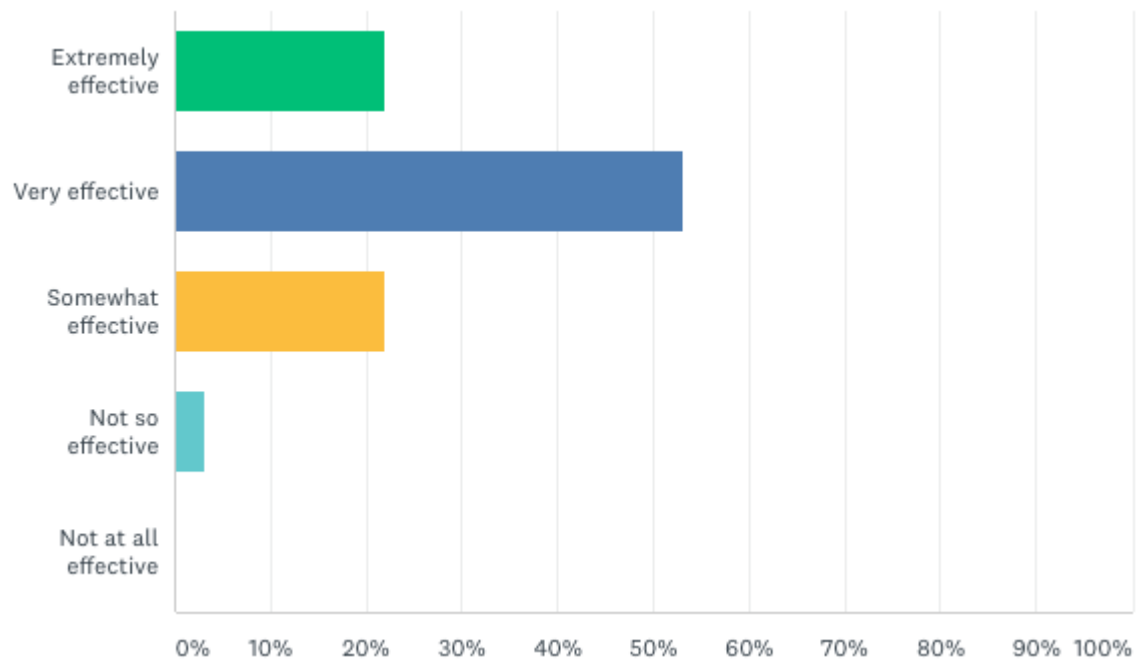
#### Comments:

- e.g. once in two years
- once or twice a year
- every two years
- twice a year
- once, twice a year
- 1 per 3 years
- Annually
- once per year every year, but between the RBMPs the events should be shorter - more a brainstorming of what people think that it is important for the Danube and as an information platform

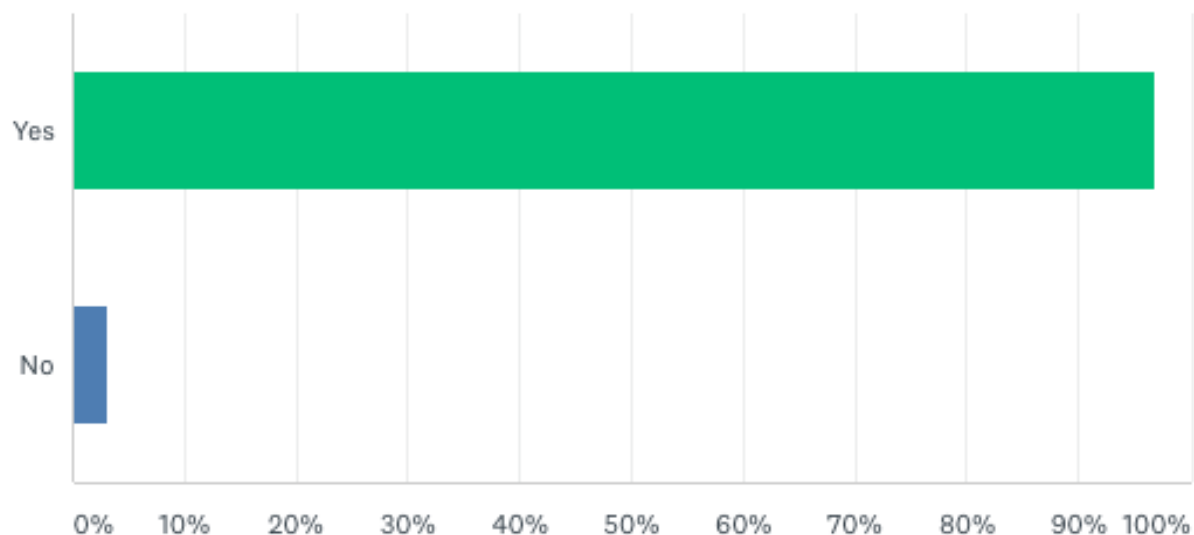
### 3.13.6 Question 6: Would you like to get involved in further activities based on the Workshop results?



### 3.13.7 Question 7: Do you think the Zoom format in general was effective?



### 3.13.8 Question 8: Did you feel that all essential topics related to the DRBMP & DFRMP Updates 2021 were covered?



Comment:

- Nature restoration, biodiversity protection, ecosystem services

### 3.13.9 Question 9: Do you have any final thoughts or comments you would like to share with us?

- No, I don't have any comments
- There were too many and too long keynote speeches at the beginning of Day1. This should be significantly less, or replaced by a short overview about the draft plans which are discussed in the breakout rooms.
- no
- Great job
- Communication is a key challenge
- How to get feedback from the large public in real time is the challenge. And how to help those responsible for decision -making to have read, and even studied carefully, the documents.
- No, for this format it was very good.
- Thank you very much for your efforts done, and I am waiting for workshop of next year
- Great work with such a complicated workshop! Definitely one of the better zoom conferences I've attended in the last year
- Not enough preparation before the workshop. It would have been better to receive less emails, but one with a clear and short explanation of the expected outcome. I did not

know e.g. that you cannot chose among the presented topics/groups but have to attend all of them.

- No
- ICPDR did a very good job! Thank you!
- Introduced presentations would be useful to be shared. :)
- I am very content with this workshop. Keep up with good work!
- Very well-prepared workshop, very professional. Really good moderator.

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## 4 Annex C: Online Questionnaire

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### 4.1 Introduction

Until December 2021, the ICPDR developed the Danube River Basin Management Plan (DRBMP) & Danube Flood Risk Management Plan (DFRMP) Updates 2021, both pertaining to the period between 2021 and 2027. For the development of these management plans, both representatives of civil society and stakeholders were called upon to contribute their views through a range of public consultation activities. All the people, cultures, and citizens of the Danube River Basin are affected by the measures that follow the plans, thus they were given an opportunity to have their say on the development of the plans from the outset. To expand the target groups of the public consultation process beyond expert stakeholders, a simple and accessible online questionnaire on the subject of both the DRBMP & DFRMP Updates 2021 was developed by the ICPDR for inclusion on its website: ICPDR.org.

The target group for this questionnaire included the interested, but less informed, members of the public. The questions related to very general aspects of the management plans, and sought feedback from the public in an attempt to both inform them about the plans, and confirm their satisfaction with the proposed measures. It also sought to shed light on the priorities of the general public with regard to climate change prevention, managing flood risks, and various other activities included in both the DRBMP & DFRMP Updates 2021. This questionnaire hoped to draw attention to both the plans and the public consultation measures themselves.

The record of the ICPDR's 2021 Public Consultation Process along with its results can be found published on ICPDR.org: <http://icpdr.org/main/activities-projects/public-consultation-draft-management-plan-updates-2021>

In 2021, 350 individuals began this questionnaire, 265 filled it in up to and including question 5, 255 filled it in up to and including question 8, and a grand total of 232 filled in the entire questionnaire.

While the information received through the questionnaire was very general, the questionnaire covered an important part of the ICPDR's comprehensive strategy to actively reach a broad audience with different consultation measures.



## 4.2 Headline Statistics

The Online Questionnaire was run on ICPDR.org/forms for a period of 6 months

- It ran from 1<sup>st</sup> April 2021 – 30<sup>th</sup> September 2021

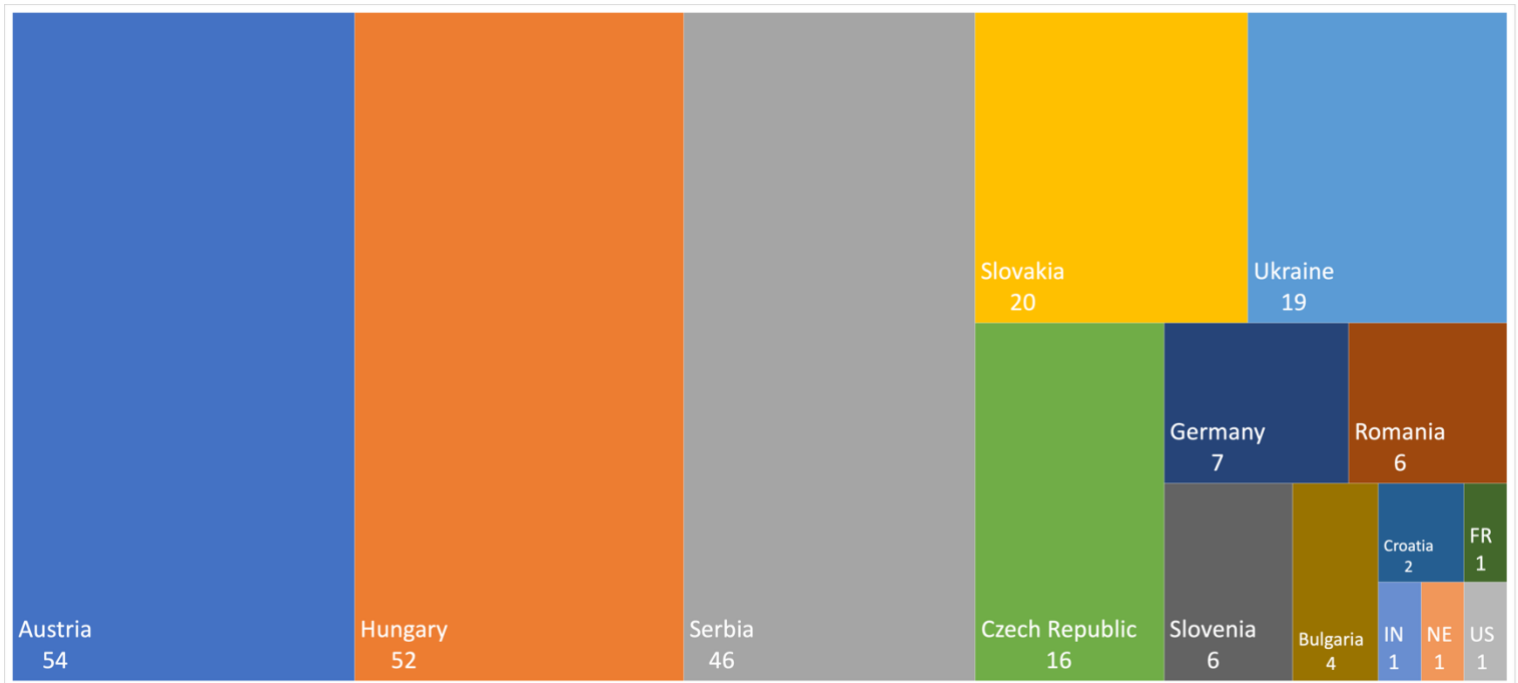
350 individuals opened the questionnaire

- 265 individuals filled in up to and including question 5
- 255 individuals filled in up to and including question 8
- 232 individuals fully filled in the entire questionnaire

The questionnaire was available in 11 languages:

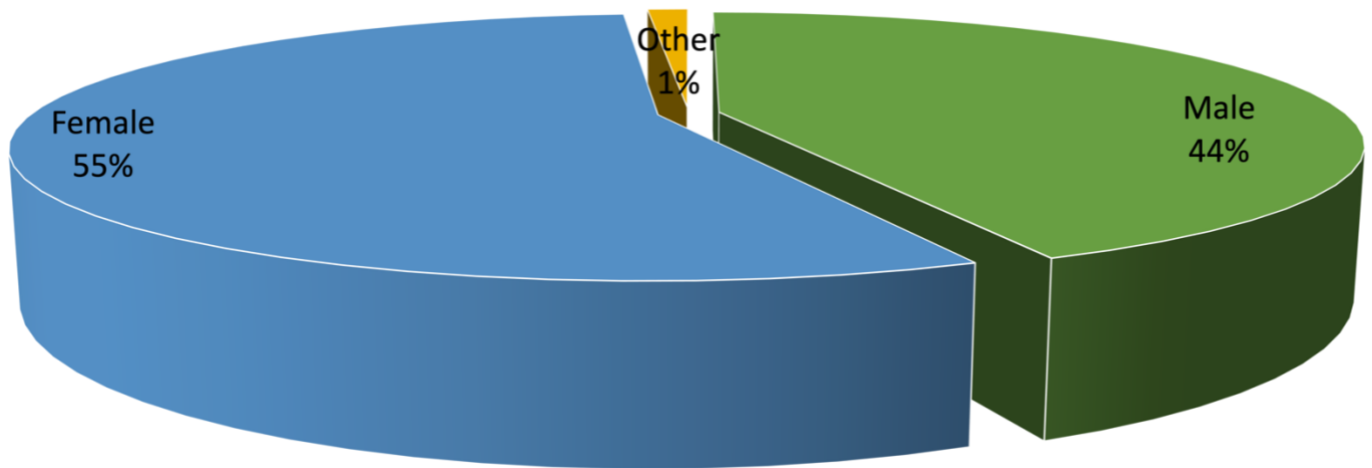
- English
- Bulgarian (Български)
- Croatian (Hrvatski)
- Czech (Čeština)
- German (Deutsch)
- Hungarian (Magyar)
- Romanian (Română)
- Serbian (Српски)
- Slovak (Slovenčina)
- Slovenian (Slovenščina)
- Ukrainian (Українська)

The questionnaire was opened by individuals in 15 countries:



### Gender

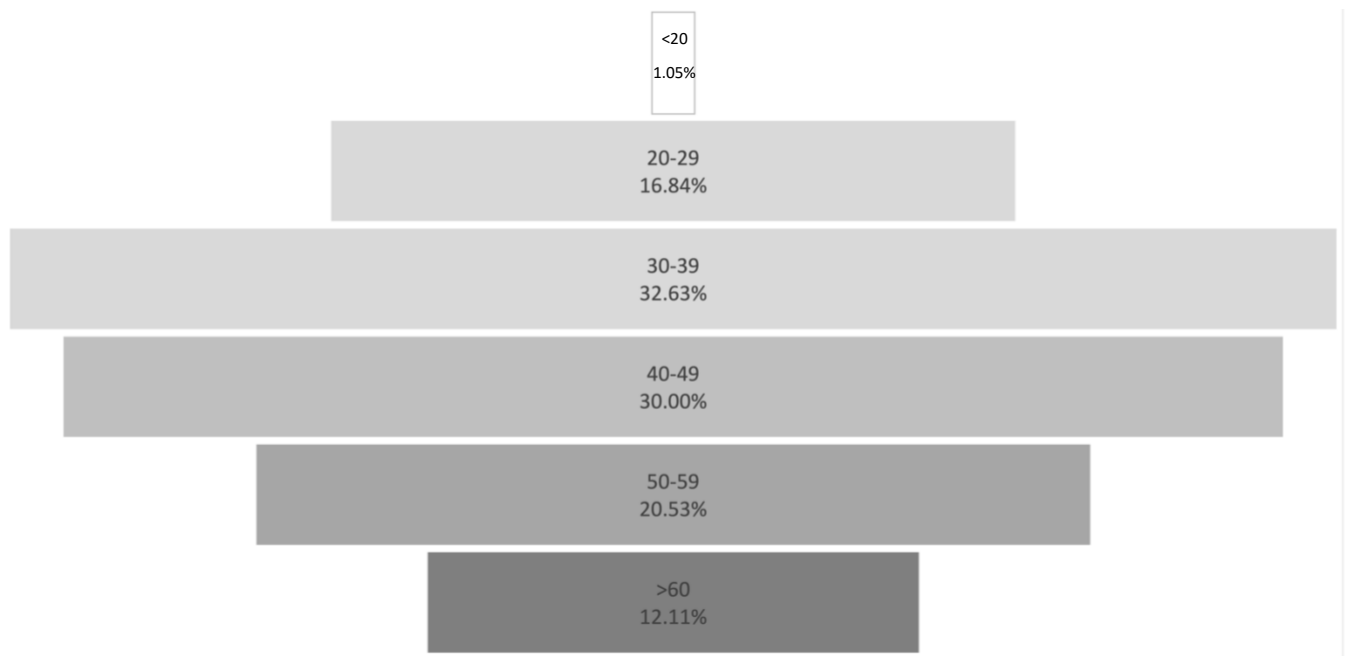
The majority of those who completed the questionnaire were women:



### Age

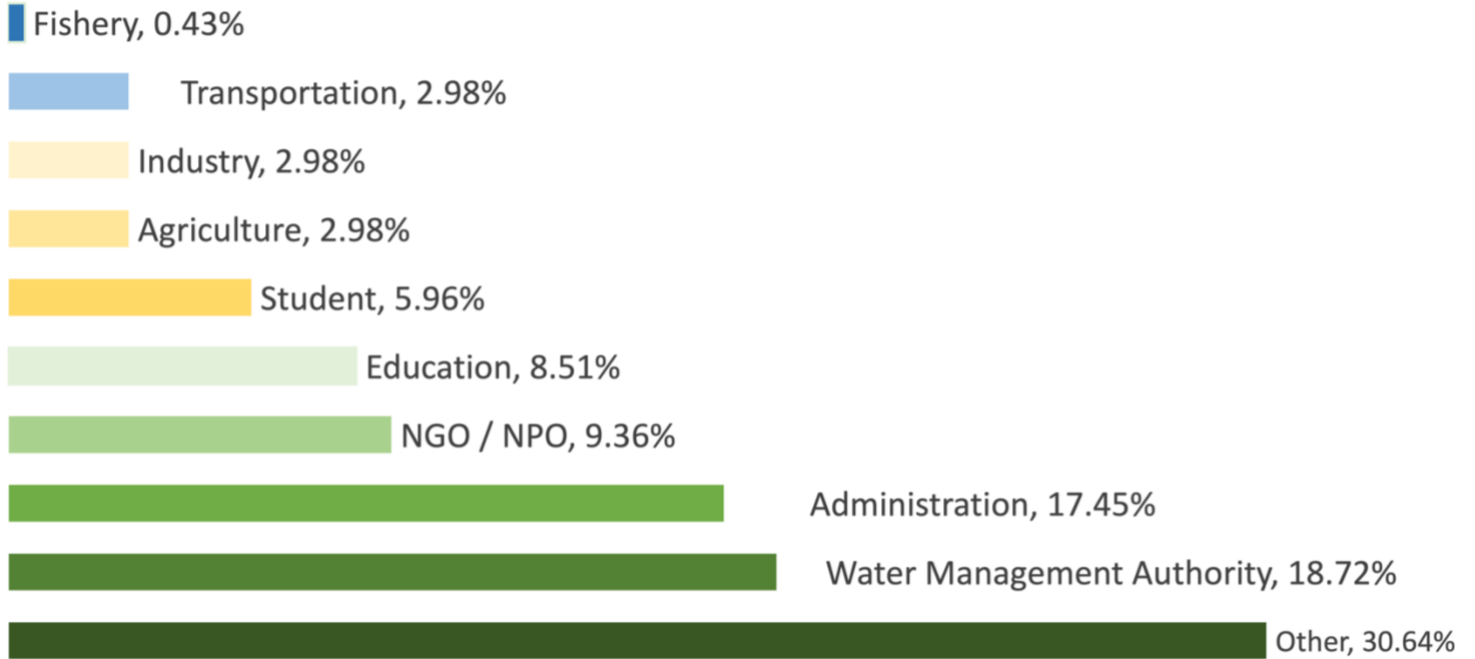
A very low percentage of those who filled out the questionnaire were aged below 20, while a slightly lower percentage were aged over 60.

The spread those aged between 20 – 59 however, was generally rather even, with 30-39 comprising the largest single age group.



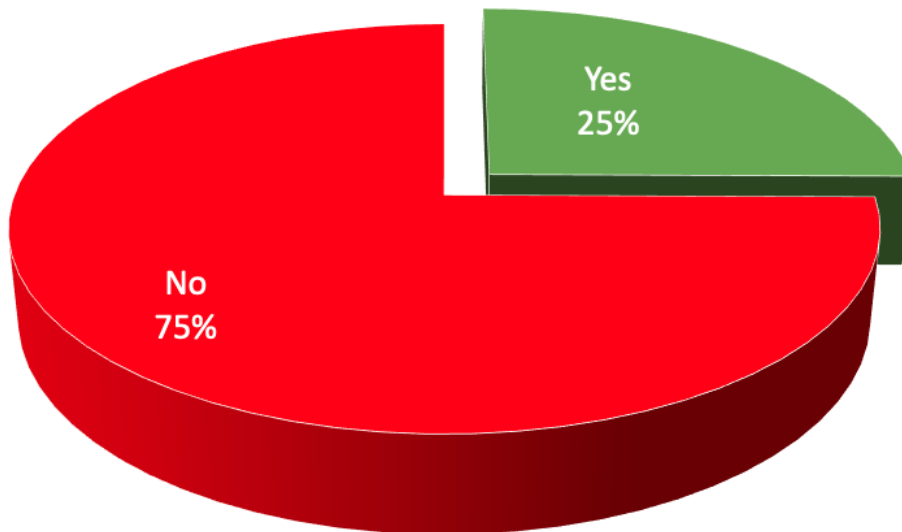
### Professional Background

The individuals who filled in the Online Questionnaire came from a wide variety of relevant fields. The single largest group (excluding ‘Other’) was *Water Management Authority*, followed closely by *Administration*.



### Follow-Up Information

*Q: I want to receive follow-up information*



### 4.3 Online Questionnaire: Introduction Text

What is the purpose of this questionnaire?

***Let us explain!*** This questionnaire is seeking your input as a member of the public living in the Danube River Basin. It has been designed to be both informative for you as a member of the public, and to help us to find out more about public perception and knowledge of draft management plans in the River Basin.

What are the DRBMP & DFRMP?

***Let us explain!*** Every six years, the International Commission for the Protection of the Danube River (ICPDR) updates its “Danube River Basin Management Plan” (DRBMP), including assessments and measures towards the achievement of “good status” in waters of the Danube River Basin. The previous update to the Danube River Basin Management Plan was in 2015, followed by its second update forthcoming in 2021.

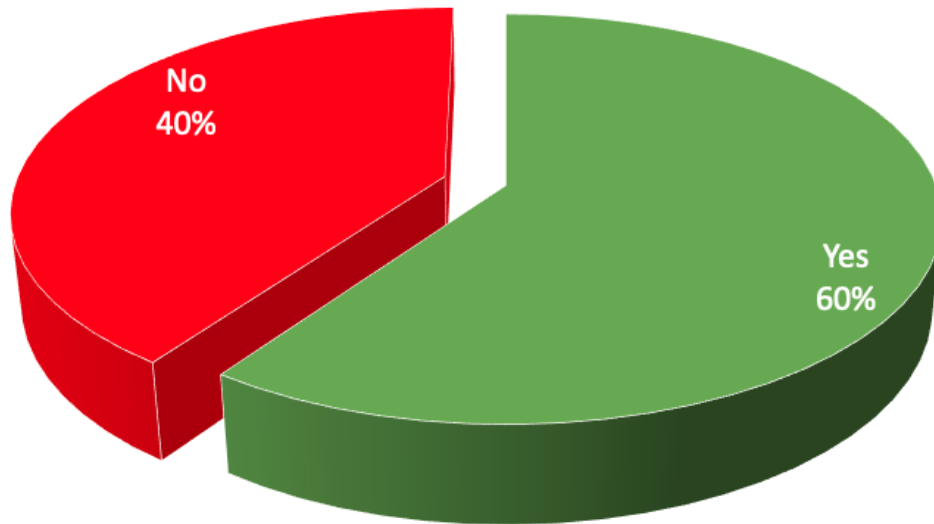
The “Danube Flood Risk Management Plan” (DFRMP) – a similar document focusing on the assessment and management of flood risk in the region – was first published in 2015, and is receiving its first update in 2021.

The ICPDR’s mission in implementing the Danube River Protection Convention (DRPC), the EU Water Framework Directive (WFD), and the EU Floods Directive (FD) – as well as the various directives and strategic plans shaping its work – is to achieve the ICPDR’s three key pillars:

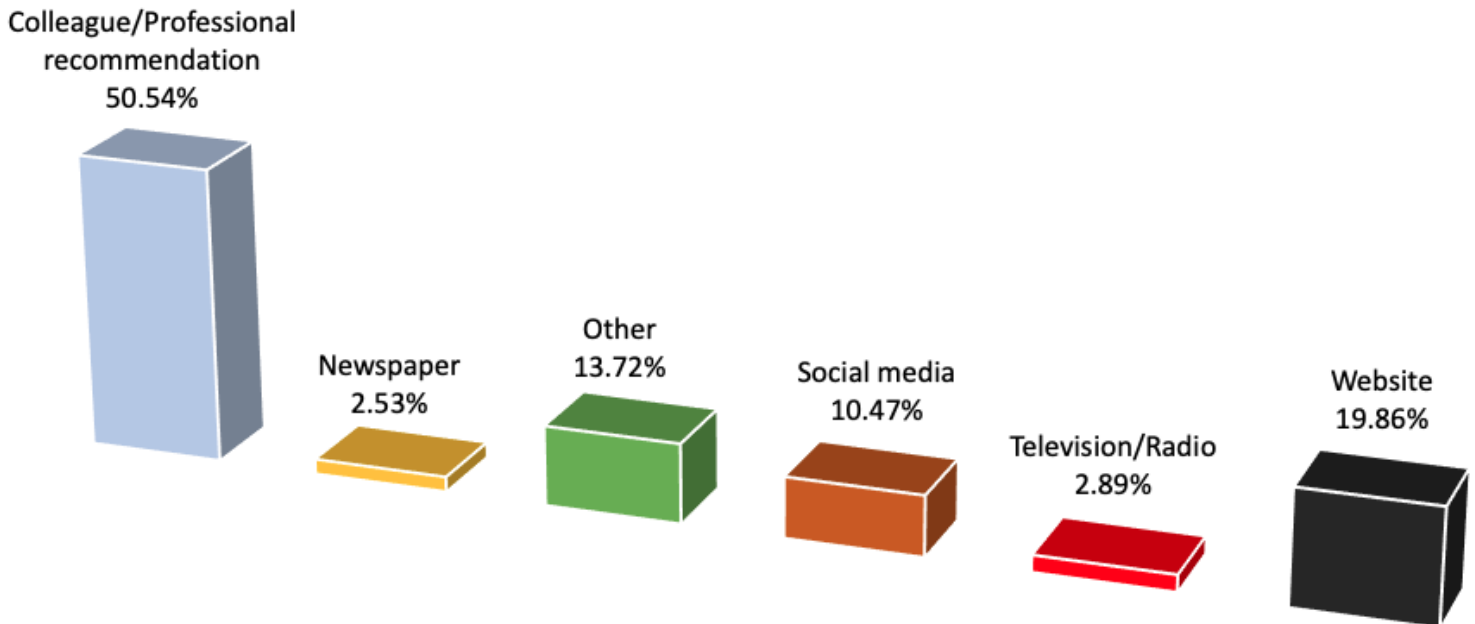
- “CLEANER” waters for everyone to enjoy;
- a “HEALTHIER” home for aquatic animals and plants and;
- a “SAFER” environment for people to live without the fear of floods.

#### 4.4 Danube River Basin Management Plan: Results

*Q1: Before you received this questionnaire – had you heard of the Danube River Basin Management Plan?*

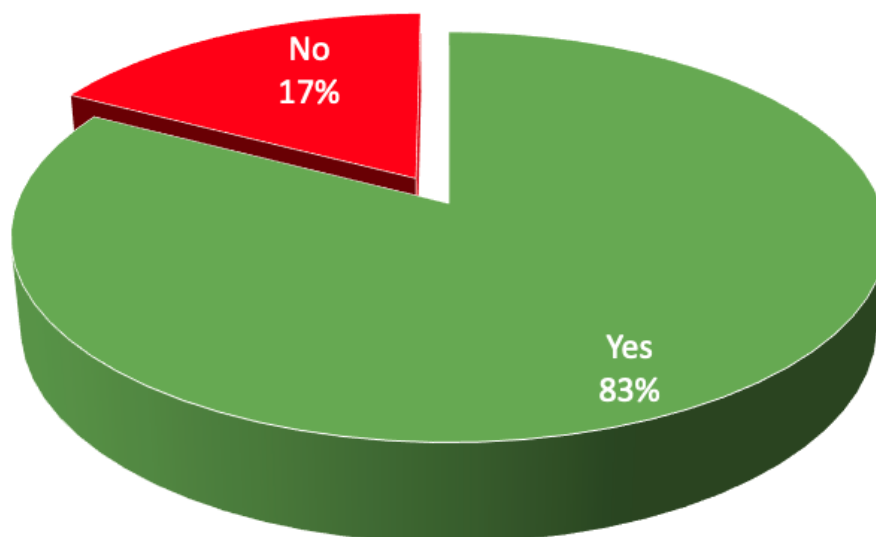


*Q2: Where did you hear about the Danube River Basin Management Plan?*



**Let us explain!** The measures described in the Danube River Basin Management Plan address all phases of the six-year management cycle. They focus particularly on five Significant Water Management Issues (SWMIs) – Organic Pollution, Nutrient Pollution, Hazardous Substances Pollution, Hydromorphological Alterations, and Effects of Climate Change. These can affect the status and quality of surface waters like rivers, lakes, transitional and coastal water bodies and transboundary groundwater bodies.

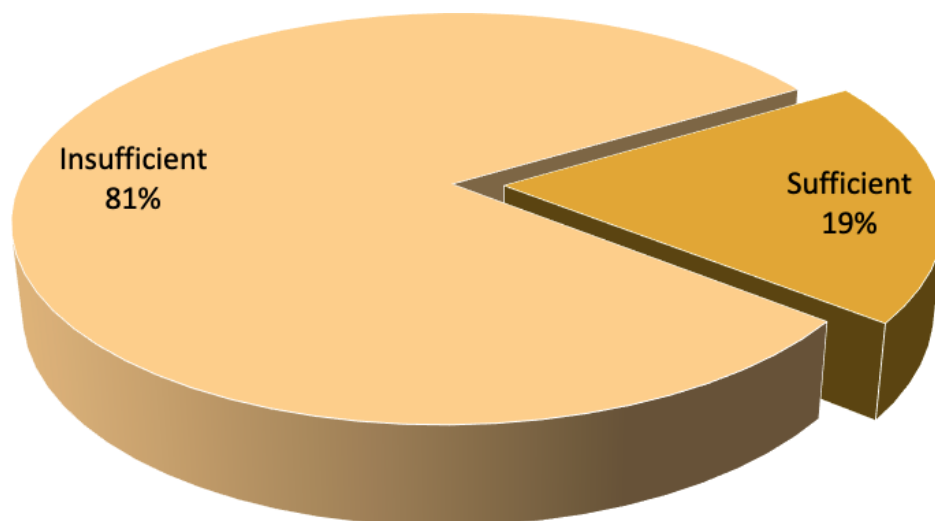
*Q2.1 Do you know what Organic Pollution is?*



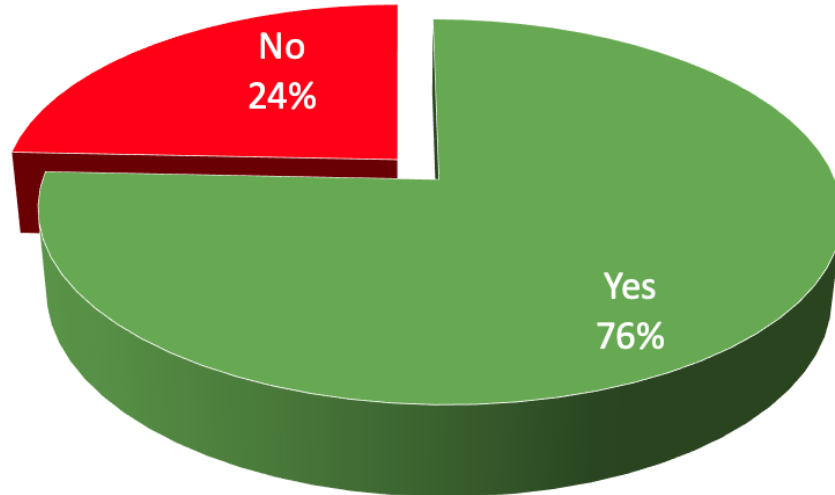
***Let us explain!*** Wastewater contaminated with organic pollution, i.e. faeces, organic household and industrial waste that can be digested by microorganisms, can lead to a loss of oxygen in waters creating an unfriendly and unhealthy environment for many aquatic creatures. Efforts are now underway to clean up this pollution at its source to ensure much cleaner waters for people to enjoy and healthier ecosystems for a better life.

*In the Danube River Basin, a reduction of 40% in organic pollution from urban wastewater treatment plants has been observed since 2015.*

*Q2.2 Do you think this reduction in organic pollution is:*



Q3.1 Do you know what Nutrient Pollution is?



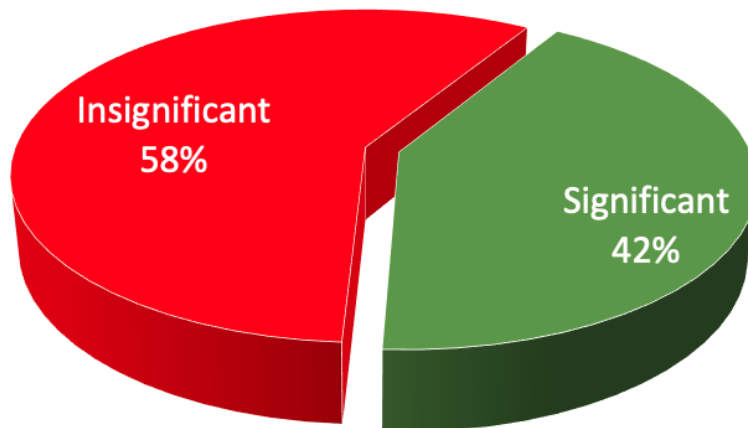
**Let us explain!** When wastewater or fertilizer nutrients such as nitrogen or phosphorus get into surface waters, they encourage algae growth. As algae grow, they block sunlight from other aquatic plants, which eventually die, to then be digested by bacteria, using up the oxygen in the water too, potentially killing off fish and other aquatic species. Urban and industrial wastewater and polluted water from agriculture can lead to massive algae blooms.

Such nutrient emissions enter water bodies via both point sources (identifiable single entry points) such as wastewater treatment plants, as well as more diffuse pathways (not identifiable spread entry points) such as runoff, soil erosion and subsurface flow. Both emission categories introduce and transport nutrients from agriculture, urban areas, atmosphere and even natural areas into the Danube River Basin's waters.

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In the Danube River Basin, a decrease in nutrient emissions from urban wastewater treatment plants has also been observed since 2015. For example, nitrogen emissions have reduced by 20%, while those of phosphorus have seen a 30% reduction.

Q 3.2. Do you think this decrease in nutrient emissions is:



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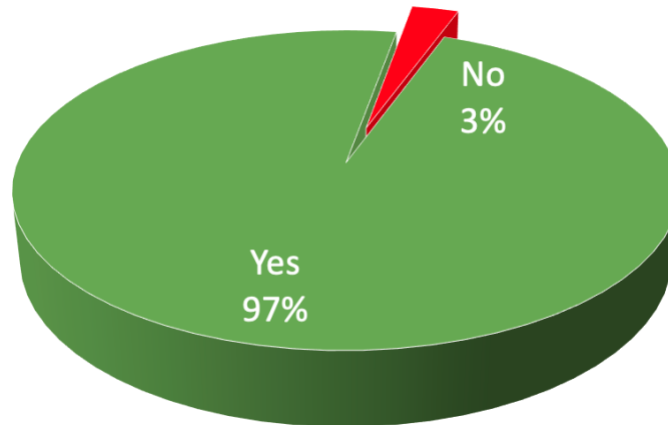
### *Effects on the Black Sea Ecosystem*

*The Danube River ultimately drains into the Black Sea at the Danube Delta in Ukraine and Romania. The Danube River Basin Management Plan specifically refers to the Black Sea as a key beneficiary of measures taken in the Danube River Basin to reduce nutrient pollution also known as eutrophication:*

*“The ICPDR’s basin-wide vision for nutrient pollution is the balanced management of nutrient emissions .... [so] that neither the waters of the [Danube River Basin] nor the Black Sea are threatened or impacted by eutrophication.”*

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*Q3.3 Do you think that nutrient pollution in the Danube River needs to be managed to protect the Black Sea ecosystem?*



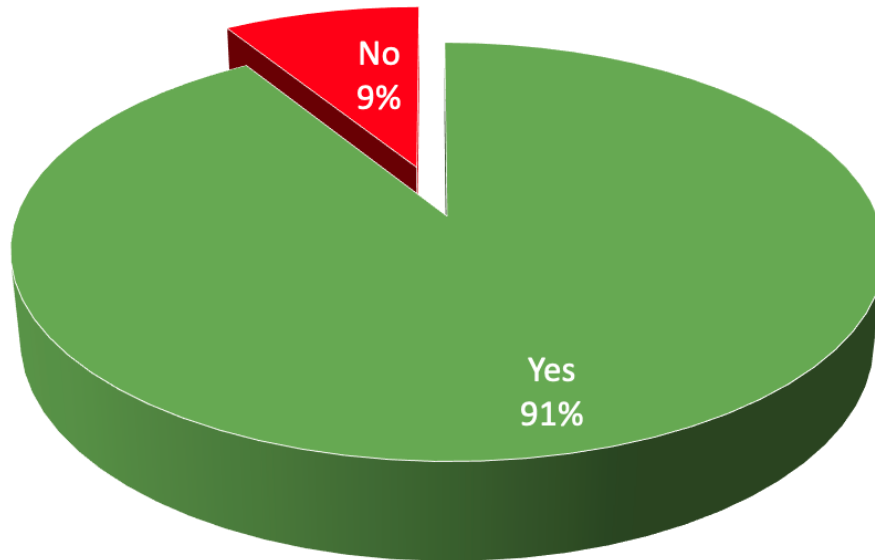
*If no, why not?*

- “for the same reasons why it is addressed in the DRBMP.”
- “Kurz vor der Mündung wird die Belastung sowieso erhöht.” (DE>EN: ‘*Shortly before the mouth of the river, the load is increased anyway.*’).
- “Mert nem kellene a keletkezett városi csapadékot és szennyvizet a folyókba engedni, hanem a sivatagosodás megállítására helyben kellene tartani! Sőt még a folyókon érkező vizeket is be kellene engedni a tájba és tájgazdálkodást folytatni!” (HU>EN: ‘*Because urban rainwater and wastewater should not be discharged into rivers, but should be kept in place to stop desertification! Moreover, even the waters coming from the rivers should be let into the landscape and should be used for landscape management!*’).
- “to je veľmi komplexný problém a nekontrolovateľný” (HU>EN: ‘*It is a complex and uncontrolled problem.*’).
- “Потребно је узети у обзир и утицај постојећих брана на Дунаву , чији утицај на екосистем није занемарљив, тако да су подручја која се налазе у зони успора брана такође једнако битна за управљање загађењем нутријентима.” (SE>EN: ‘*It is necessary to take into account the impact of existing dams on the Danube, whose impact on the ecosystem is not negligible, so that areas located in the slow zone of dams are also equally important for the management of nutrient pollution.*’).



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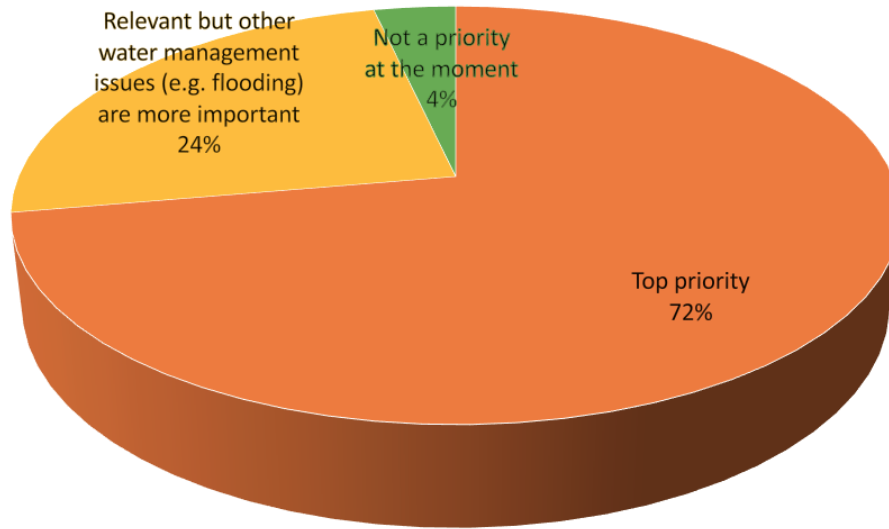
**Reducing Hazardous Substances Pollution**  
Q4.1 Do you know what Hazardous Substances Pollution is?



**Let us explain!** When we hear the word “pollution”, we often tend to think of hazardous substances - such as toxic chemicals and metals that come from industry, farming and everyday household substances, including garden pesticides, cosmetics, or medicines/pharmaceuticals. Recognizing how dangerous these substances might be to human health and ecosystems, EU legislation has significantly stepped up to reduce the emission of these hazardous substances. Aiming for cleaner waters that are healthier and safer for both people and aquatic life, new technologies, updated regulations and scientific measures are being implemented to reduce or halt the spread of hazardous substances in the waters of the Danube River Basin.

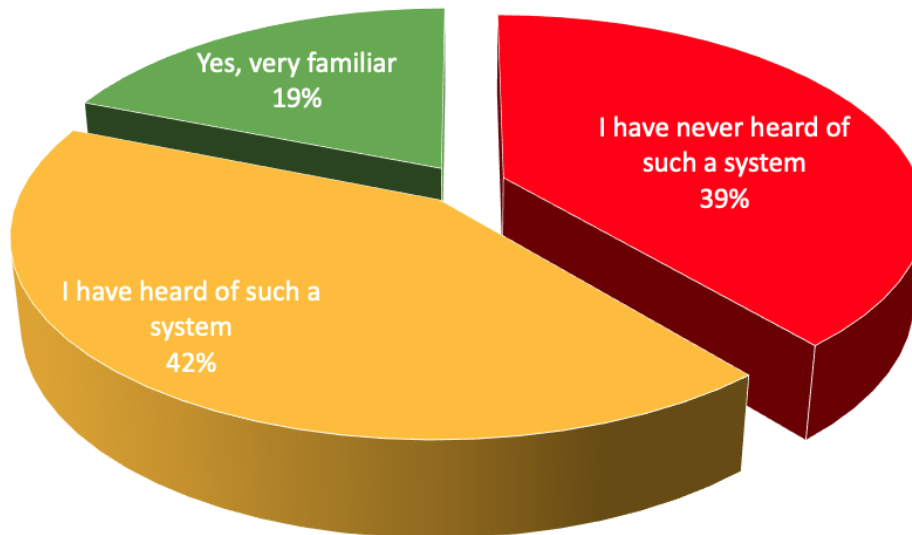
Recent ICPDR investigations have provided essential information on the nature of hazardous substances, drawing a much clearer picture of the pollution problem in the Danube River Basin. As a result, a basin-wide inventory and assessment of emissions of selected hazardous substances is being created along with recommended measures to reduce or eliminate emissions of these substances.

*Q4.2 Do you think addressing hazardous substances pollution is:*



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**Warning Against Pollution Accidents**

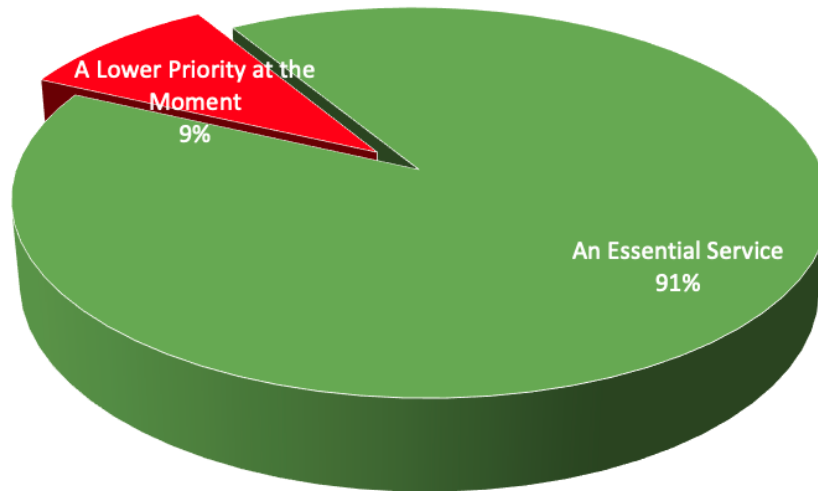
*Q4.3 Are you familiar with a river-based Accident Emergency Warning system operating in your area?*



**Let us explain!** The ICPDR is operating the Danube Accident Emergency Warning System (AEWS), activated whenever there is a risk of transboundary water pollution, e.g. a chemical spill or accident on or near the river.

The AEWS sends out international warning messages to countries downstream based on a predefined routing scheme. Details about each incident, such as time, place, involved substances, causes, observed effects, and counter measures taken are collected in predefined forms and automatically translated into the recipient's language. This helps authorities to put environmental protection and public safety measures into action.

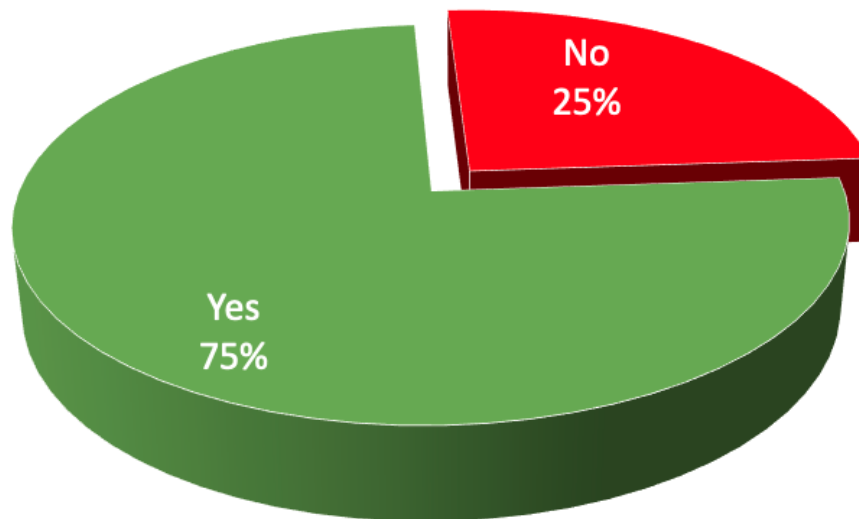
**Q4.4** *The Danube River Basin Management Plan Update 2021 proposes to continue maintaining the AEWS system in future years. Do you see this as:*



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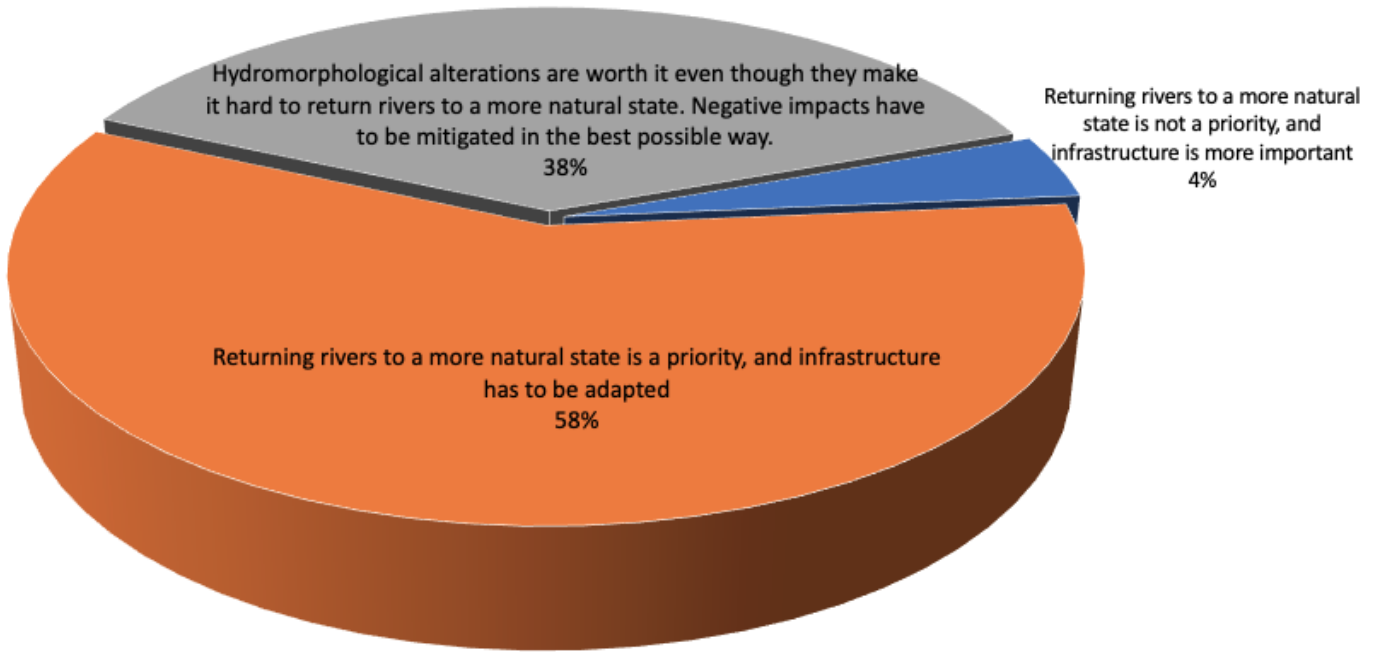
**Addressing Hydromorphological Alterations**

**Q5.1** *Do you know what Hydromorphological Alterations are?*



**Let us explain!** Over the last few decades, human activities – such as building dams and reservoirs, fragmenting rivers, ponding or channelizing them, and abstracting water – have led to changes in the physical conditions of the Danube and its tributaries. Even small stretches can be massively affected when the river’s natural course is changed. These changes in physical conditions are called ‘Hydromorphological Alterations’. Consequently, natural habitats have been substantially decreased and biodiversity significantly reduced (e.g. due to interrupted fish migration routes). Today, however, Danube countries are working hand-in-hand to make our waters a healthier home for aquatic life once again, with great benefits for society.

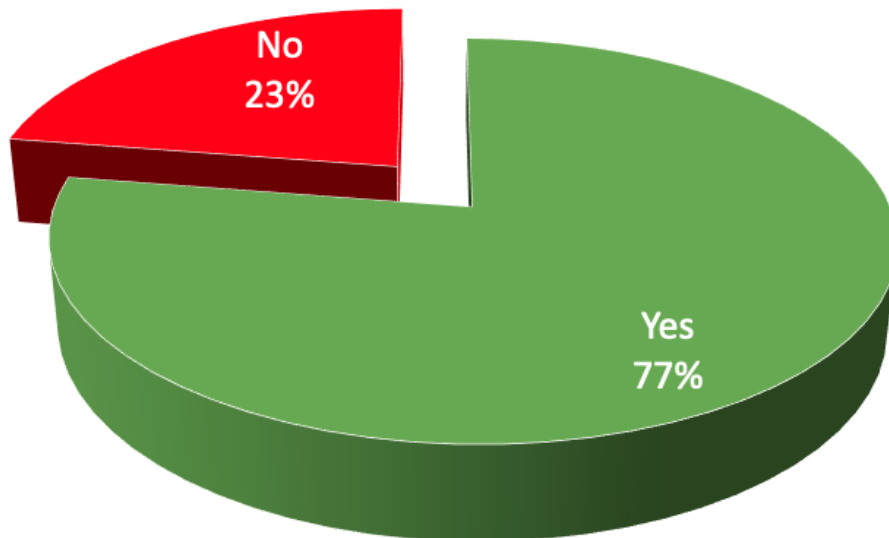
Q5.2 Which of the statements above most closely reflects your opinion?



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**Addressing Effects of Climate Change**

Q6.1 Do you know the ways in which Climate Change could impact rivers such as the Danube?

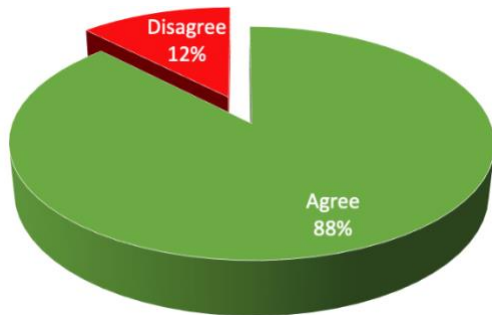


**Let us explain!** Climate Change is already taking a strong toll on rivers such as the Danube, leading to increased water scarcity, and other extreme events. In 2019, the ICPDR added “Effects of climate change (drought, water scarcity, extreme hydrological phenomena and other impacts)” to its list of Significant Water Management Issues (SWMIs), indicating it as a top priority for the Danube River Basin.

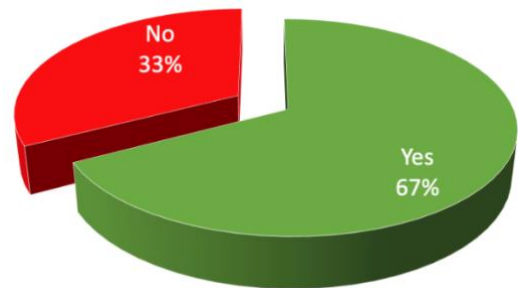
**Q6.2** *The Danube River Basin Management Plan Update 2021 describes the following vision for Climate Change prevention:*

*“The ICPDR’s basin-wide vision to deal with adaptation to and mitigation of water related effects of climate change (drought, water scarcity, extreme hydrological phenomena and other impacts) is to make full use of our wealth of knowledge on River Basin Management to meet the challenges posed by climate change, to achieve resilience and ultimately sustain the inherent ecological and cultural value of the aquatic environment for the Danube River Basin. Preventive measures will be taken to mitigate impacts of climate change, to adapt to it and to minimise the related damages, thus reducing the vulnerability of aquatic ecosystems and water related ecosystems to climate change.”*

*Do you agree that Climate Change is a top priority to be addressed for protecting rivers?*



**Q6.3** *Are you aware of the different ways in which you as an individual can actively contribute to improving the status of waters in the Danube River Basin*

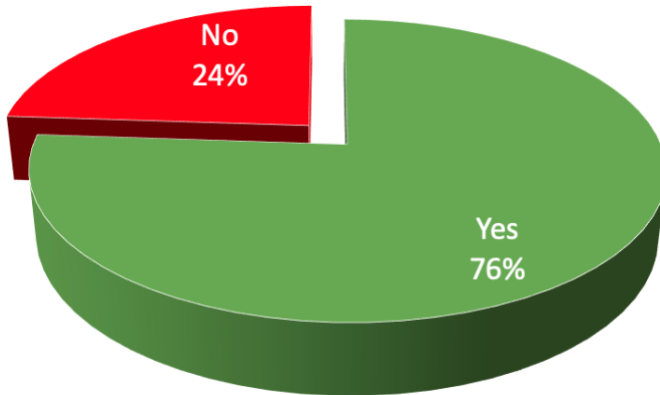


**Let us explain!** There is a variety of ways to help improve water status, such as:

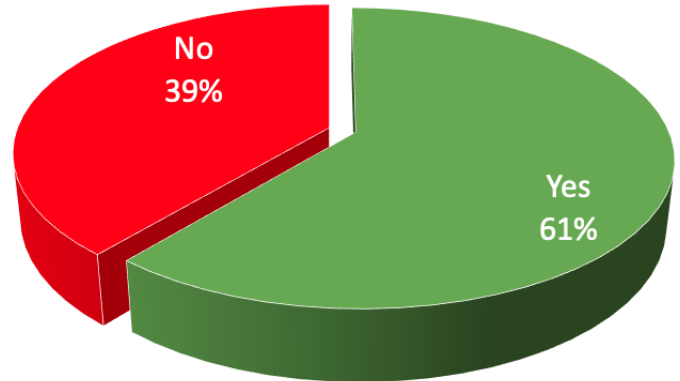
- Not flushing household waste (including makeup, medicine, and other chemicals)
- Reducing unnecessary drinking water use at home
- Collecting rainwater for irrigation
- Reducing waste generation (plastic, food)
- Choosing tap water over bottled mineral water
- Reducing chemical fertiliser and pesticide use in gardens and yards
- Choosing environmentally friendly products where possible
- Safely recycling hazardous waste
- Taking part in clean-up actions at rivers and river banks

## 4.5 Danube Flood Risk Management Plan: Results

*Q7 Before receiving this questionnaire – were you aware of measures/constructions in your area to prevent or protect from floods?*



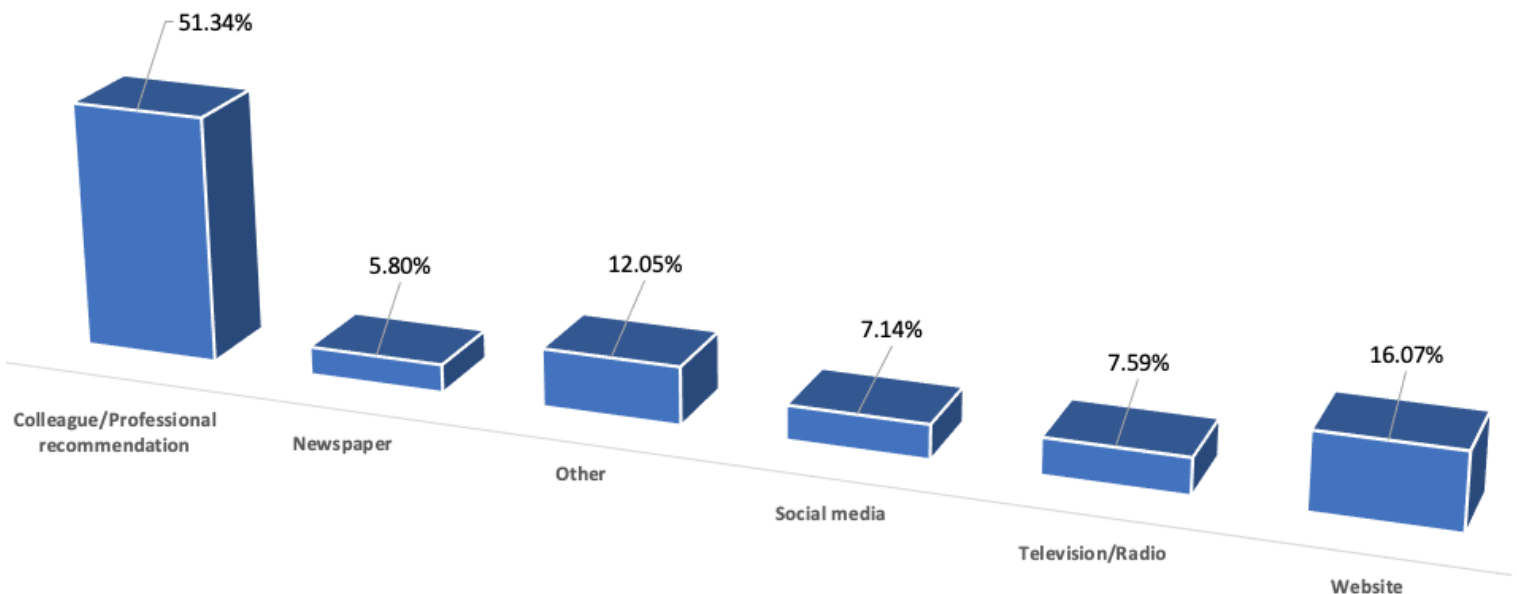
*Q8 Before you received this questionnaire – had you heard of the Danube Flood Risk Management Plan?*



**Let us explain!** The measures described in the Danube Flood Risk Management Plan address all phases of the six-year flood risk management cycle and focus particularly on:

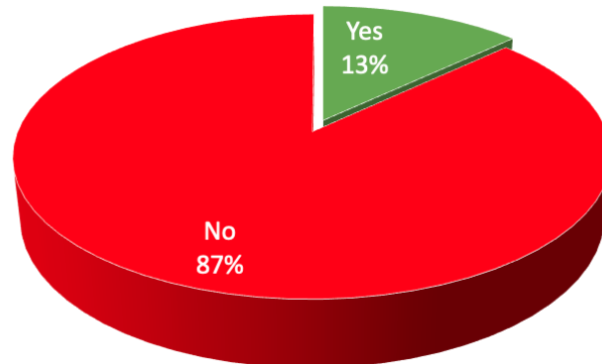
- prevention (i.e. preventing damage caused by floods by avoiding construction of houses and industries in present and future flood-prone areas or by adapting future developments to the risk of flooding),
- protection (by taking measures to reduce the likelihood of floods and/or the impact of floods in a specific location such as restoring floodplains and wetlands), and
- preparedness (e.g. providing information to the public on what to do in the event of flooding, raising their awareness, and the creation of flood risk maps).

*Q8.1 Where did you hear about the Danube Flood Risk Management Plan?*



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**Protecting Against Flooding**

*Q9 Do you think it is possible to be fully protected from any flooding?*

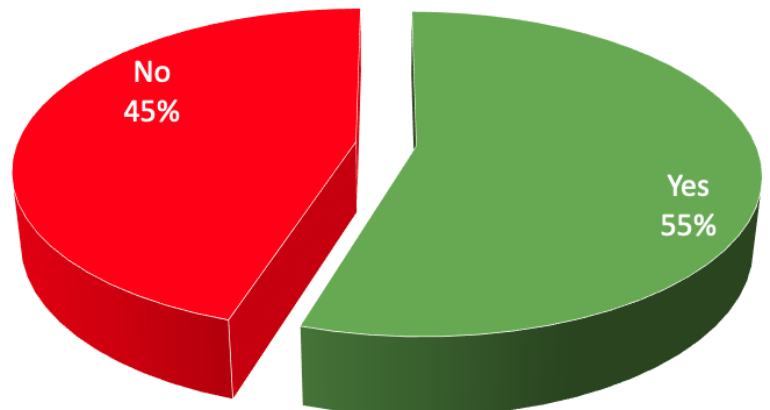
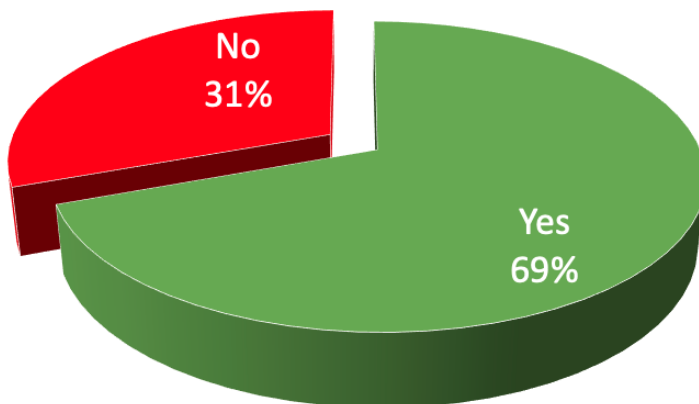


**Let us explain!** Flood events in recent decades have proven that despite all protection efforts, some level of residual risk will always remain. In accordance with standards, flood protection measures are designed - if possible - to withstand a so-called '100-years flood event' (an extreme flood only likely to occur once per century). Even so, it is always possible for these measures to become overloaded by even larger floods, thus they do not guarantee a 'total' safety – although certainly a greatly reduced risk. Such flood protection measures are always built in coordination with all relevant stakeholders including the participation of potentially affected people.

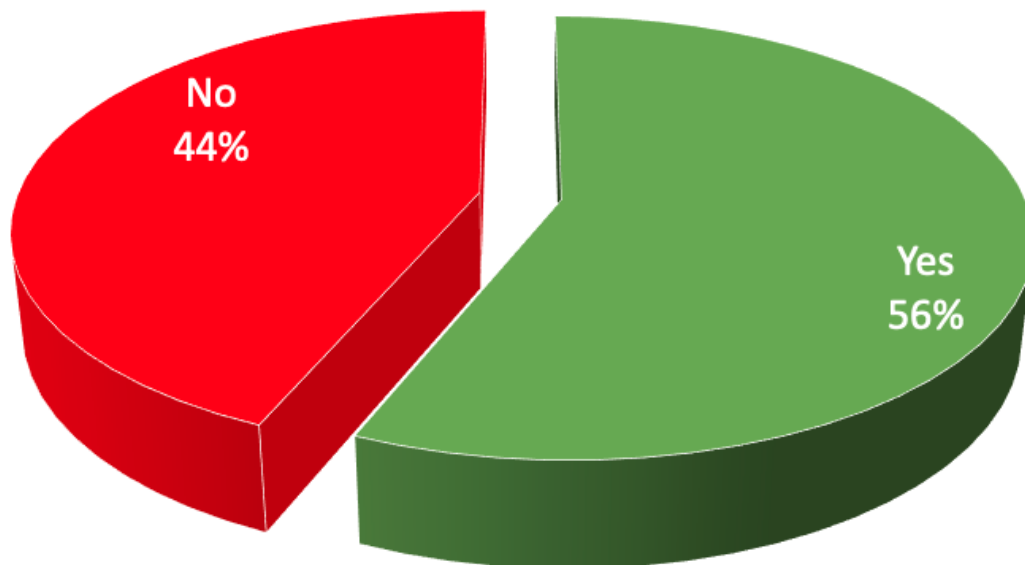
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**Flood Warning System**

*Q10 Are you aware of any flood early warning system, providing early warning against flooding danger?*

*Q10.1 Do you know how to access and use it?*



*Q10.2 Are you familiar with such flood monitoring systems operating in your country?*



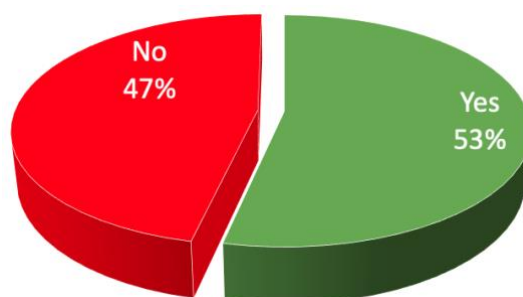
***Let us explain!*** Meteorological services in the countries of the Danube River Basin provide certain insights when it comes to flood forecasting and warning. These include monitoring and forecasting of the weather situation, advisory and warnings on dangerous weather events such as heavy precipitation, storms, hail, etc.

Hydrological services monitor the current situation on the rivers in the Danube River Basin via gauging stations, which provide regular hydrological information. The flood forecasting services regularly provide hydrological forecasts and publish them online. In case of flooding, flood protection authorities are immediately informed. Warning messages are circulated as soon as extreme meteorological or hydrological conditions have been forecasted. During floods, these messages are accompanied by information on the flood's evolution and further forecasting.



### ***Natural Flood Protection***

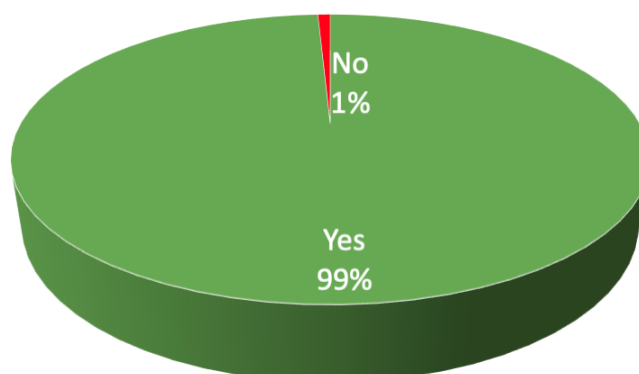
*Q11 Are you aware of the implementation of natural water retention projects in your municipality/location/area/region?*



***Let us explain!*** Natural water retention means that efforts should be made to retain rainwater at the location or in the ground where it fell. This approach helps to reduce flood risks and also contributes to improving the environment (a win-win solution). Some key practices that can improve natural water retention include: afforestation (planting new trees in previously bare areas), buffer strips (large areas of empty land used to retain water), terracing, sustainable urban drainage systems, green roofs (grass-covered roof-tops with many benefits such as improving air quality and adapting urban areas to a future climate with warmer summers), restoration of wetlands, and floodplains.

### ***Managing Floods Across Borders***

*Q12 Do you agree that working together with your closest neighbouring countries on transboundary water management issues is the most effective approach?*

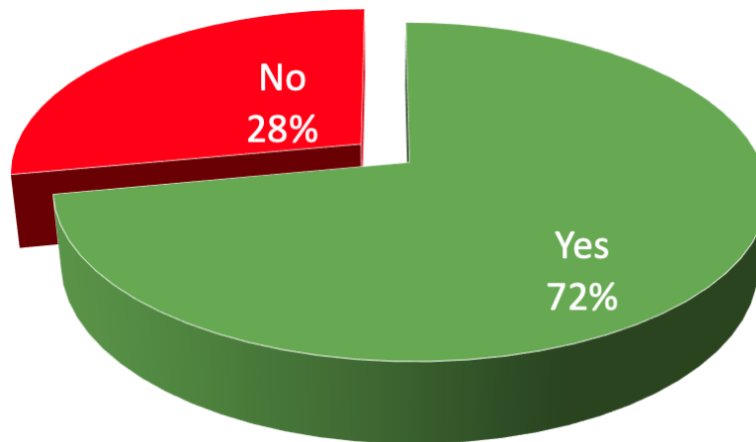


***Let us explain!*** The ICPDR is fully aware of the importance of applying the solidarity principle; one should not pass-on water management problems from one region to another. That is why the ICPDR agreed that measures with downstream effects shall have key priority at the basin-wide level. According to the Danube Flood Risk Management Plan: “Countries shall not apply measures which, by their extent and impact, significantly increase flood risks in the countries neighbouring upstream or downstream. Countries should take all possible steps not to export the flood problems to their neighbours.”

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**How to: Self-protection precautions in case of flooding**

*Q13 Are you aware of the different ways that you as an individual can protect yourself and your property from flooding?*



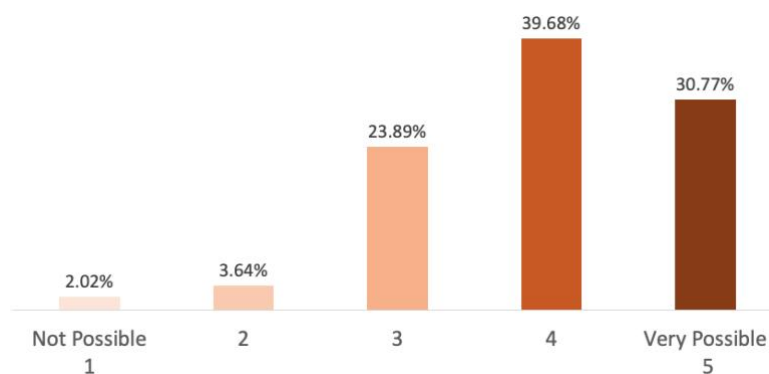
**Let us explain!** There are a variety of ways individuals and property owners can take their own precautionary measures against floods:

- Keep water away from the building (choice of location of the building, water sensitive shaping of the terrain, walls and swells, ramps, little banks, mobile elements, demountable barriers).
- Sealing and protecting (sealing of doors and windows, mobile closures, waterproof walls).
- Wet precaution (controlled flooding, stilted buildings).

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**Managing Floods Across Borders**

*Q14 In your municipality/area/region, do you think it's realistic to protect your natural water resources and still effectively prevent flooding?*

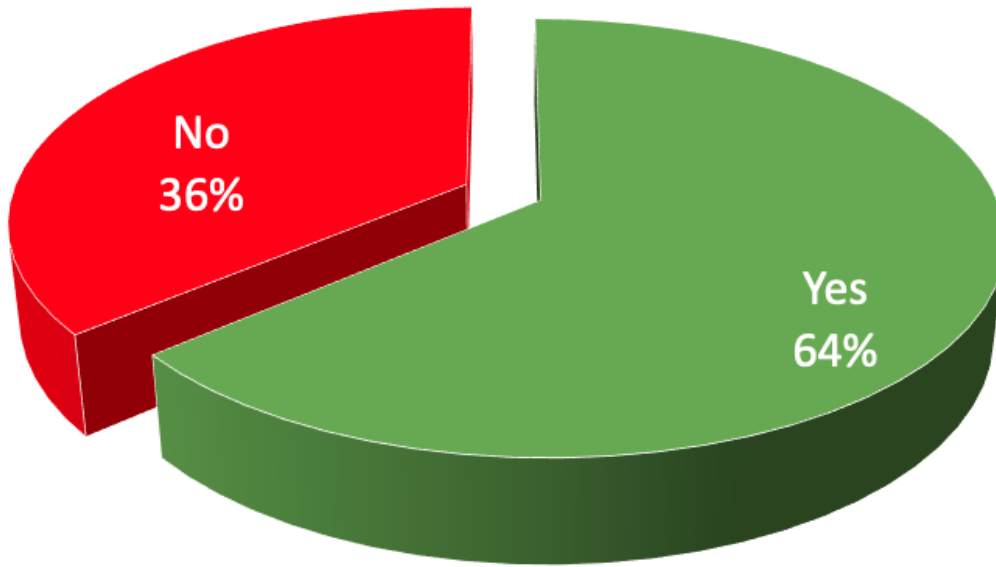


**Let us explain!** In practical terms, there are a number of reasons why coordination between the Water Framework Directive (achieving ‘good water status’) and the Floods Directive (flood protection) is beneficial. These include:

- Interaction of legal and planning instruments in many countries;
- Planning and management under both Directives generally use the same geographical unit (e.g. the Danube River Basin);
- Aiding the efficiency of the implementation of measures and increasing the efficient use of resources.

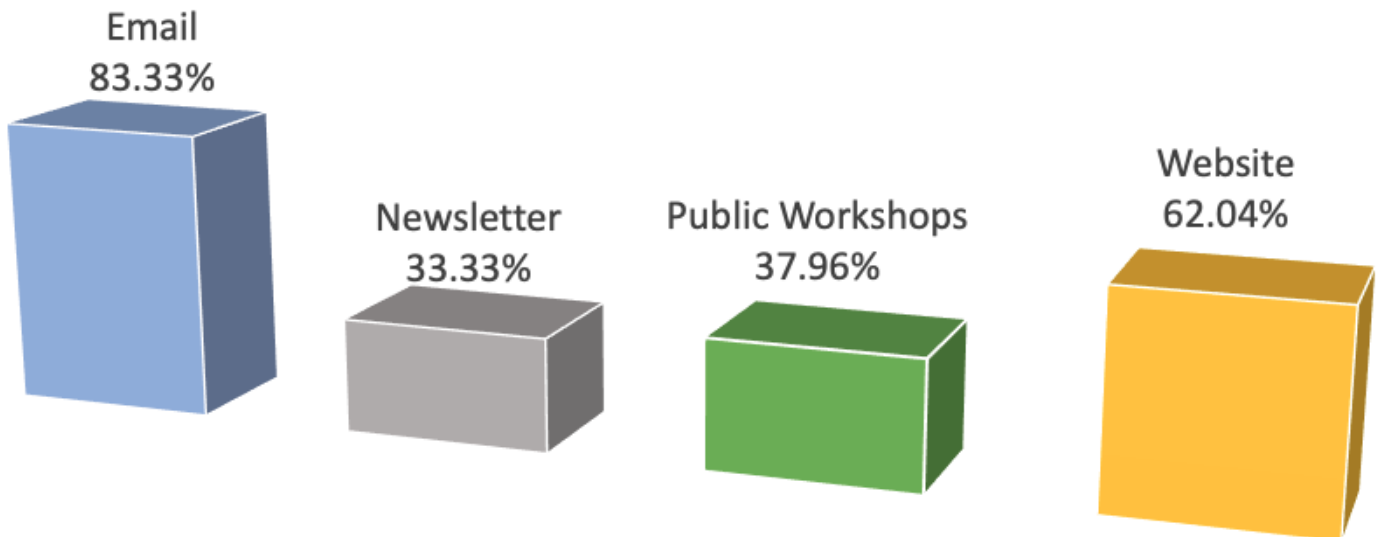
**Getting ready for tomorrow**

*Q15 Do you wish to be informed about activities of the ICPDR, related to flood management, in the future?*



*Q16 How would you like to be informed about floods, your personal risk from floods and what you personally can do for better protection from flooding?*

**NB: Multiple answers possible**



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## 5 Annex D: Social Media Campaign

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To include the general public that would not be targeted by the other consultation measures, a social media campaign was implemented in parallel to the stakeholder consultation workshop. Its main objective was awareness raising and cross-link to other consultation tools.

Priority for this was given to Facebook, backed up with Twitter (hashtag #DanubeVoice) during the stakeholder workshop. Between 14 May and 12 July 2015, the campaign yielded 20 new Twitter followers; 186 new Facebook fans; 2,905 interactions by 2,358 unique users; as well as 927,863 impressions.

While the social media campaign did not directly lead to substantial comments on the management plans, it covered an important part of the ICPDR's comprehensive strategy to actively target a broad audience with different consultation measures.

### 5.1 Public Consultation on Social Media 2021

#### 5.1.1 Reporting

During a 14-day period around the Stakeholder-Workshop (20st June - 3rd July), almost 10 % of the impressions based on campaign activities were generated (27.5k) with the relevant hashtag (#OurDanube) put to use 18 (131 in total) times.

In the period between 31st March – 30th September 2021, the campaign yielded 59 new Twitter followers; 143 new Facebook followers; 63 new Instagram followers; 13,033 interactions (Twitter mentions, retweets and Facebook stories created for the profiles to this group); as well as more than 300,000 impressions (the combined number of potential users who saw content associated with the Twitter & Facebook profiles connected to the relevant Twitter and Facebook accounts).

#### 5.1.2 Figures

##### FOLLOWERS

*New Followers (total): 265*

- Twitter: 59
- Facebook: 143
- Instagram: 63

##### IMPRESSIONS

*During the campaign period (total): 491,171*

- Facebook: 370,958
- Twitter: 120,214

*Related directly to campaign (total): 308,066*

- Facebook: 226,294
- Twitter: 81,772

*14-day period Stakeholder-Workshop (total): 27,515*

- Facebook: 17,489
- Twitter: 10,026

*Campaign Videoclips (total): 140,883*

- Facebook: 124,156
- Twitter: 15,757
- LinkedIn: 722
- Instagram: 24

## INTERACTIONS

*Related directly to the campaign period (total):*  
**13,033**

- Twitter: 1,852
- Facebook: 11,181

*Campaign Videoclips (total):* **8,950**

- Facebook: 8,739
- Twitter: 174
- Instagram: 37

*Interactions 14-day period Stakeholder-Workshop (total):* **679**

- Twitter: 85
- Facebook: 594

## HASHTAG

*#OurDanube (total):* **131 times**

- Twitter: used 26 times
- Facebook: used 49 times
- Instagram: used 35 times
- LinkedIn: used 21 times

*#OurDanube 14-day period:* **18 times**

- Twitter: used 5 times
- Facebook: used 4 times
- Instagram: used 5 times
- LinkedIn: used 4 times

## AUDIENCE

*Likes by Countries - Top 5 (Facebook)*

1. Romania
2. Ukraine
3. Serbia
4. Austria
5. Bulgaria

*Likes by Gender & Age (Facebook)*

- 55.1 % Female
- 44.9 % Male
- The majority of people who have liked our posts are between 25 and 54 years old.

### 5.1.3 Conclusion

- Nearly two thirds (63 %) of the impressions generated during the campaigns period on social media, are attributable to the campaign activities.
- Almost 10 % of the impressions based on campaign activities, were generated in the 14-day long period surrounding the stakeholder workshop.
- The whole campaign generated more than 13,000 interactions. This includes clicks, retweets, replies, likes and Facebook stories created for the profiles to this group.
- The videoclips alone received more than 140,000 impressions and nearly 9,000 interactions. Thus, 45 % of all impression generated due to public consultation social media activities and two thirds of interactions, where generated with these videoclips.
- The Hashtag #OurDanube was put to use in the whole campaign period for 131 times.
- The majority of people who have liked our posts are between 25 and 54 years old.
- The relation between gender is nearly equally balanced, with slightly bit more woman liking the posts in the campaign period.

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## 6 Annex E: Comments Submitted in Writing

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The draft for both the DRBMP & DFRMP Updates 2021 were published and made online to receive public comments from 31<sup>st</sup> March 2021 until 30<sup>th</sup> September 2021.

During this period, a total 11 written statements were provided from organisations, with 165 statements received from private individuals.

The following 10 organisations (in alphabetical order) contributed comments on the DRBMP:

<b>Organisation</b>	<b>Pg. No</b>
DSTF (Danube Sturgeon Task Force)	119 - 120
EUSDR PA6	121 - 124
GWP Hungary	125 - 128
IAD	129 - 130
EBU	131 - 132
MEASURES	133 - 138
TID(Y) UP	139 - 154
WSV	155 - 161
WWF Adria	162 - 163
WWF CEE	164 - 173

One organisation submitted a written statement pertaining specifically to the DFRMP Update 2021:

<b>Organisation</b>	<b>Pg. No</b>
WWF Hungary	174 - 181

All 11 original organisation letters containing comments, in addition to the 165 private individuals' comments, were as published as PDFs on <https://www.icpdr.org/main/activities-projects/public-consultation-results>.

The comments from 165 private individuals are also included in unabridged form on [pages 182 - 346](#)

Below you will find unabridged text versions in the complete form without letter heads. The individual aspects of the comments were put into context with the relevant chapters of the commented management plan and discussed by responsible ICPDR expert or task group. These comments and the responses by the ICPDR are given in the Overview Reply Table tables in chapter 2 of this report.

June 2021

## **Request for better reflection of outcome of MEASURES project in the DRBMP Update 2021**

DSTF appreciates that the draft DRBMP 2021 Update that entered public consultation had been strengthened concerning sturgeon conservation. Since then, the project MEASURES (Managing and restoring aquatic EcologicAl corridors for migratory fiSh species in the danUbe RivEr baSin), financed by the EU's Danube Transnational Programme, has issued some key results that need to be reflected in the Plan. This relates in particular to the conclusion that the functionality of ecological corridors for migratory fishes – including sturgeons – need to be secured by (1) ensuring the physical connectivity by addressing the issue of migration barriers, (2) protection and restoration of suitable habitats, (3) strengthening fish populations. The project also identified important data gaps that need to be filled through additional habitat surveys, including in the Black Sea, the protection status of the habitats, and monitoring of populations and habitat use.

In the following, DSTF provides recommendations on how the scientific input from MEASURES results can be integrated into the DRBMP with focus on restoration of ecological corridors and coordination and strengthening of intersectoral and international cooperation.

### **1) Restoration of ecological corridors**

The DSTF highly appreciates that chapter 6.7 of the draft DRBMP 2021 Update summarises key measures (table 31, pp 103-104) needed for effective restoration of the Danube sturgeon populations. The DSTF also appreciates the continued commitment to establishing a solution to fish migration across the Iron Gate dams reconnecting the Lower Danube with the Middle Danube, as a basic prerequisite for migratory sturgeon recovery in this river section, and to begin exploration of solutions for fish passage at the Gabčíkovo water structures to reconnect the Middle Danube with the Upper Danube.

The importance of functional ecological corridors for migratory fish is equally well reflected in vision statement of section 8.1.5.2.1 "Interruption of River Continuity for Fish Migration" of the Joint Programme of Measures.<sup>1</sup> The management objectives for 2027 also address well the issues of existing or potential future barriers and thus the improvement of physical river connectivity and fish migration as set out in section 8.1.5.2.1.3 on the measures of basin-wide importance.

**However, specific measures for habitat or population restoration complementing the already included continuity measures, in line with vision and objectives, are missing completely**

DSTF therefore recommends including in chapter 8.1.5.3.1 "River Morphological Alterations" the following additional management objectives (*in red italics below*), in line with the very well formulated vision statement<sup>2</sup>:

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<sup>1</sup> "The ICPDR's basin-wide vision is that anthropogenic barriers and habitat deficits do not hinder fish migration and spawning anymore – sturgeon species and specified other migratory species are able to access the Danube River and relevant tributaries. Sturgeon species and specified other migratory species are represented with self-sustaining populations in the DRBD according to their historical distribution"

<sup>2</sup> The ICPDR's basin-wide vision for morphological alterations is that rivers will be revitalized/ restored and maintained in a way, that aquatic species/populations are not negatively impacted, moreover, in a way that river restorations will support improvement of connection to groundwater bodies

- ⇒ Restoration/mitigation of river morphological alterations and habitats to ensure improvement of aquatic ecosystems and water status.
  - ⇒ Specification of location and extent of measures for the improvement of river morphology that will be implemented by 2027 by each country
    - ⇒ *Restoration of habitats of migratory fish species, in particular sturgeons*
    - ⇒ *Based on the results of MEASURES, complete the identification of habitats for migratory fish species and the assessment of their protection status to address the remaining gaps of a network of critical habitats and complete the map produced by the MEASURES project.*
    - ⇒ *Assess habitat functionality by monitoring the migratory fish populations and their habitat use*
    - ⇒ *Establish working relations with authorities responsible for nature protection and biodiversity in Contracting Parties, who will be closely associated in achieving this mission.*

## 2) Strengthening of intersectoral and international cooperation

Chapter 6.7 of the draft DRBMP 2021 Update rightly states that: “Saving the Danube sturgeon species is a truly multi-level governance challenge which will require the involvement of many disparate sectors and authorities at different administrative levels and many different economic stakeholders and civil society. There is no single sector or territorial jurisdiction where the long-term effectiveness of conservation measures does not depend on measures being taken in other sectors or in other territorial jurisdictions.” Chapters 6.2 on the marine environment and 6.3 on nature protection already speak on the need for cooperation.

**However, DSTF misses a clear commitment to engaging actively in such cross-disciplinary dialogues towards sturgeon conservation and would suggest the following modified wording on p. 103:**

“Effective action therefore requires effective coordination of action between different territorial jurisdictions and the relevant international organisations and authorities. The ICPDR and the Contracting Parties **are committed to** playing a crucial role by maintaining dialogue and discussion with other key actors to ensure, as far as possible, that the necessary actions **listed in Table 31** are taken. In this regard, follow up measures to the projects mentioned above **should** be considered as well as the organisation of a multisectoral conference for all stakeholders, **including those from the Black Sea cooperation context**, with the aim to **assess gaps and** discuss the need for further actions.”

**DSTF also recommends** including in the workplan of respective ICPDR Working and Task Groups for the period 2022-2027 analyses of data resulting from the measures listed above (identification of habitats for migratory fish species, monitoring, protection status) with involvement of nature conservation departments and making the identification and monitoring of activities towards a functioning network of critical sturgeon habitats a priority.

In view of the intersectoral nature of these issues, **a strong political commitment** from the responsible Ministers at the 2022 ICPDR Ministerial Meeting will be very important, in particular with regard to intensified cooperation between key players engaged in water management of Danube and the Black Sea Basins responsible for nature conservation, fisheries, navigation, hydropower or enforcement.

In this context, **DSTF strongly welcomes that the Romanian 2022 ICPDR Presidency is considering taking the lead in organizing a conference for all stakeholders** which will discuss the need for action to restore and conserve the Danube sturgeons in the Danube and Black Sea Basins.



Dear Madame, Dear Sir,  
Dear Colleagues,  
Dear Friends,

For the Danube River Basin Management Plan, also as national member of EUSDR PA6, please let me kindly call your attention to the latest researches on different modes of transport. I think this basic fact may reorganize priorities among transport modes in the Danube Valley.

Shortly:

**Inland navigation causes almost one and a half times the greenhouse gas load of railways.**

Detailed:

A new study commissioned by the European Environment Agency presents a clear hierarchy of passenger and freight transport modes in terms of greenhouse gas (GHG) emissions. The issue becomes particularly important in achieving climate neutrality by 2050 (see for example Hungarian Act XLIV of 2020 on Climate Protection). The relevant report is summarized below.

### **Key messages**

- There are big differences in the GHG efficiency of motorised transport modes in Europe and, consequently, their contributions to global warming. This confirms the importance of shifting transport to the most efficient modes.
- Rail and waterborne transport are much more GHG efficient than road transport and aviation, both for passengers and for freight.
- While the efficiency of rail transport and aviation improved markedly during the 5-year period covered by the study, the efficiency of other modes appears to have stagnated or even declined.
- Geography, distance, journeys that are time critical and the need for door-to-door mobility set limits on the shift from one transport mode to another. Hence, improving the GHG efficiency of all modes of transport remains vital.

The decarbonization of transport is slow compared with that of other economic sectors such as energy supply and industry. Most other sectors have reduced their emissions significantly since 1990, while transport emissions have risen and gained in relative importance. It is, therefore, imperative to make both passenger and freight transport in Europe more efficient and less dependent on fossil fuels. Facilitating a shift towards the lowest-emission transport modes is an important part of this effort. But how do the different modes of transport in the EU (i.e. road, rail, aviation, inland waterway transport and maritime shipping) stack up in terms of their greenhouse gas (GHG) emissions per unit transported? This briefing seeks to answer the question. The results presented here are from a recent study commissioned by the *EEA* (<https://www.eea.europa.eu/>). The study was conducted by *Fraunhofer ISI* (<https://www.isi.fraunhofer.de/en.html>) and *CE Delft* (<https://cedelft.eu/>), which had the task of developing a method for reporting on the GHG efficiency of the main modes of transport in Europe.

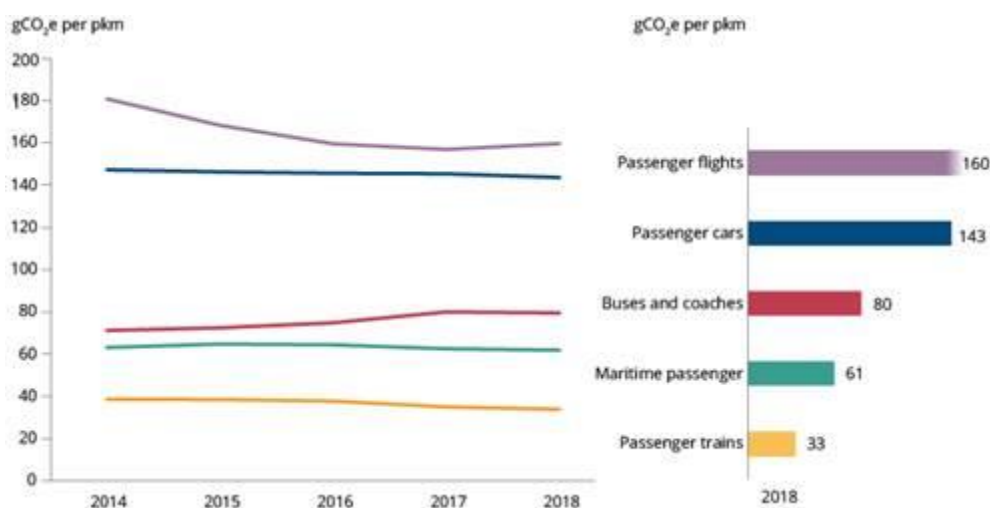
One objective of the EU and its Member States is to drastically reduce GHG emissions to achieve the objectives of the **Paris agreement** (<https://unfccc.int/process-and-meetings/the->

[paris-agreement/the-paris-agreement](#)). This is expressed in the **European Green Deal** ([https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal\\_en](https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en)), which sets the ambition to achieve climate neutrality by 2050. For transport, which currently accounts for 24.6% of the EU's total emissions, the European Green Deal calls for a 90% reduction by 2050 compared with 1990. The European Commission's **Sustainable and Smart Mobility Strategy** (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0789>), published in December 2020, calls for 'decisive action to shift more activity towards more sustainable transport modes'. The strategy identifies a doubling of high-speed rail traffic in Europe by 2030 and a tripling by 2050 as milestones for passenger transport. For rail freight transport, it aims at a 50% increase by 2030 and a doubling by 2050. Freight transport by inland waterways and short-distance sea shipping should increase by 25% by 2030 and 50% by 2050. Reaching these milestones is expected to contribute to a reduction in the environmental pressures from the mobility system. This approach reflects the fact that some forms of motorised transport are more energy efficient and less GHG intensive than others.

All values presented here are 'well-to-wheel'. This means that both the emissions from the production and distribution of fuels and those from using them are accounted for. As a next step, it would be desirable to also include the emissions from vehicle manufacturing, maintenance and recycling, as well as those related to the construction and maintenance of transport infrastructure. However, for the time being, such a life-cycle analysis is still hampered by a lack of data at European level.

### Trains are the best choice for passenger travel

Figure 1 shows a clear hierarchy for motorised passenger travel when it comes to GHG efficiency. The relevant unit is passenger-km (pkm), which means moving one passenger over one kilometre.



Average GHG emissions by motorised mode of passenger transport, EU-27, 2014-2018

**Source:** Fraunhofer ISI and CE Delft, 2020

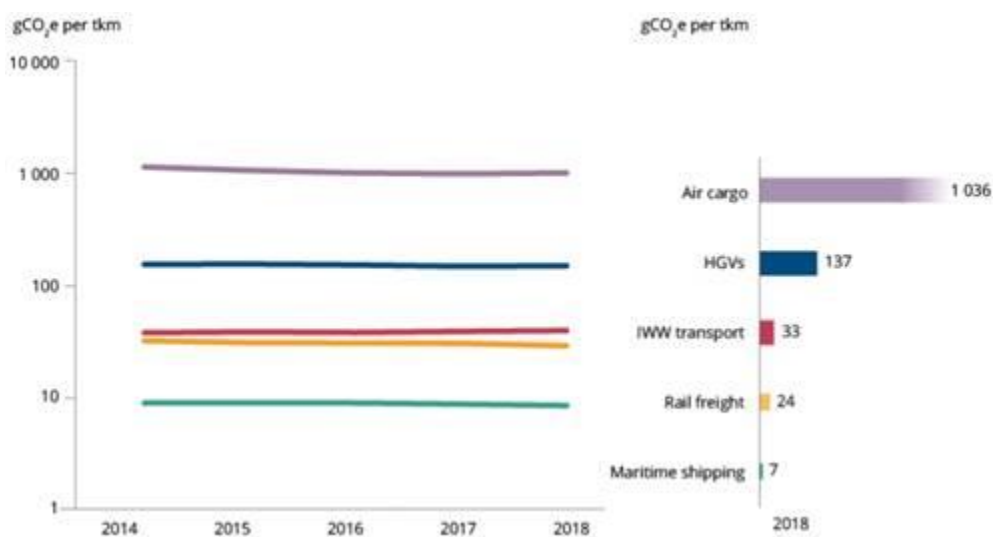
**Notes:** pkm = passenger kilometre; implied car occupancy rate: 1.6

**Trains are the most efficient form of passenger transport** in the EU, with GHG emissions per pkm that are only a fraction of most other modes. The second most efficient mode is maritime passenger transport. However, the value presented here mainly represents emissions from roll-on/roll-off ferries designed to carry both vehicles and passengers (RoPax). The detailed results show that emissions from other passenger vessel types, such as cruise ships, can be much higher. Taken together, buses and coaches are the most efficient form of road passenger transport. However, the uses of these vehicles vary significantly, which affects their emission performance. Passenger flights and cars are the least efficient forms of passenger transport and produce the highest emissions per pkm.

The results suggest that aviation and rail passenger transport efficiency improved by 12% and 13% respectively over the period from 2014 to 2018. For rail, this is mainly the result of the electrification of the rail network and the declining carbon intensity of the EU's electricity mix. For aviation, the gains owe largely to the uptake of more efficient aircraft. The GHG intensity of car travel only improved marginally over the period in question. For bus and coach travel, GHG efficiency appears to have declined.

### Vast efficiency differences in freight transport

GHG efficiency rates for freight transport vary much more than those for passengers. So much so that a **logarithmic scale** was used in the left part of Figure 2. The relevant unit is tonne-km, which means moving the payload of one tonne over one kilometre.



Average GHG emissions by motorised mode of freight transport, EU-27, 2014-2018 on logarithmic scale

**Source:** Fraunhofer ISI and CE Delft, 2020

**Note:** logarithmic scale used in left chart; tkm = tonne kilometre; HGV = Heavy Goods Vehicle; IWW = Inland WaterWay

Emissions of goods transported by sea, rail and inland waterways are very low compared to those transported by heavy goods vehicles (HGVs). **Inland navigation causes almost one and a half times the greenhouse gas load of railways.** Air freight is by far the most emitting mode of transport.

However, over the 2014-2018 period, air cargo saw the biggest GHG efficiency improvement (12%) followed by rail freight (11%). Similar to passenger transport by air and rail, more efficient aircraft and the electrification of railway lines are behind this trend. HGVs only showed a slight improvement of 3%.

The results presented above fully confirm the assumptions underpinning the EU's modal shift policy. However, not all modes are equally suited to all transport tasks. Therefore, it is not always possible to substitute one mode of transport for another. Issues related to geography (e.g. transport over water), the availability of infrastructure, as well as time criticality (e.g. for express delivery or perishable goods) limit what is possible. In addition, the most efficient motorised transport modes can only be used between transport hubs such as ports and rail freight terminals and, therefore, only function in combination with other modes.

#### **More information on this topic:**

- original English language article that introduces the report: <https://www.eea.europa.eu/publications/rail-and-waterborne-transport/rail-and-waterborne-best>
- Handbook on the external costs of transport. European Commission, Version 2019 <https://ec.europa.eu/transport/sites/transport/files/studies/internalisation-handbook-isbn-978-92-79-96917-1.pdf>
- Navigare necesse est? (English language article) <https://eionet.kormany.hu/navugare-necesse-est>

Miklós Marton  
Councillor



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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





## Enhancing aquatic biodiversity conservation in the Danube River Basin

### Current status of aquatic biodiversity

A high diversity of species and viable communities sustain ecosystem processes, increasing their resilience to global challenges and their capacity to deliver ecosystem services. The more diverse habitats and species, the more ecological benefits are provided, thus supporting human wellbeing.

Although **freshwater ecosystems play a crucial role** in supporting people and wildlife, they are among the most affected ecosystems worldwide due to unsustainable human activities: **a biodiversity decline of 84% has been recorded between 1970 – 2016**<sup>1</sup>. In Europe, the migratory freshwater fish are most impacted, a decline of 93% being reported for this group<sup>2</sup>. The European Environmental Agency highlights that only 15% of EU protected habitats are in good condition and freshwater fish have the highest proportion of bad conservation status (38%), mainly due to alteration of waterbodies (e.g., embankments), and hydropower installations (e.g. dams)<sup>3</sup>. Additionally, pollution, invasive alien species, land use and climate change are pressures that impair the resilience of ecosystems. Therefore, the IPBES concluded that biodiversity of aquatic ecosystems in Europe is seriously threatened<sup>4</sup>.

### A new political and financial frame supporting environmental conservation

In December 2019, the **EU Green Deal**<sup>5</sup> was launched aiming to reduce the impact of climate change and ensure zero CO<sub>2</sub>-emissions by 2050 (according to the UN Paris agreement 2015)<sup>6</sup>. The program supports sustainable investments and aims to decouple economic growth from exploitation of natural resources, underlining the role of natural ecosystems and the fact that all EU policies should contribute to preserve and restore Europe's natural capital. In line with this goal, it introduces several connected strategies and measures, such as:

- **The Industrial Strategy**<sup>7</sup> and **new Circular Economy Action Plan**<sup>8</sup> addressing the challenges of green and digital transformation of EU economy, the decarbonization and modernization of energy-intensive industries (e.g., steel, chemicals and cement), and the increase of sustainability of resource-intensive sectors (e.g., textiles, construction).
- **The Farm to Fork Strategy**<sup>9</sup> aiming to make food systems fair, healthy and environmentally-friendly, to reduce the use of pesticides and fertilizers in agriculture, and to decrease the adverse impacts of fishery on ecosystems, especially in sensitive areas.
- **The EU Biodiversity 2030 Strategy**<sup>10</sup> declaring biodiversity loss and ecosystem collapse as critical threats of humankind. It aims to regain biodiversity until 2030 by, e.g., improving and widening the network of protected areas, restoring at least 25,000 km of rivers, and developing an EU Nature Restoration Plan. In addition, the Commission puts forward a proposal for legally binding EU nature restoration targets in 2021; Member States should enhance conservation of all protected habitats and species by 2030.
- **A zero-pollution action plan for air, water and soil** should be adopted by the Commission in 2021 to prevent further pollution and foster cleaning remedy. To ensure a toxic-free environment, the Commission will present a sustainable chemicals strategy.

<sup>1</sup> WWF, 2020. Living Planet Report: Bending the curve of biodiversity loss. Gland, Switzerland, 83 pp (p. 24).

<sup>2</sup> World Fish Migration Foundation, 2020. The Living Planet Index for migratory freshwater fish. Groningen, Netherlands, 30 pp.

<sup>3</sup> European Environmental Agency, 2020. State of nature in the EU. Results from reporting under the nature directives 2013-2018, Copenhagen, Denmark, 146 pp.

<sup>4</sup> IPBES, 2018. The IPBES regional assessment report on biodiversity and ecosystem services for Europe and Central Asia. Rounsevell, M., Fischer, M., Torre-Marín Rando, A. and Mader, A. (eds.). Secretariat of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, Bonn, Germany, 834 pp.

<sup>5</sup> COM 640, 2019. Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions. The European Green Deal. Brussels, 11.12.2019.

<sup>6</sup> [UNFCCC] United Nations Framework Convention on Climate Change, 2015. Paris Agreement. Available at [https://unfccc.int/sites/default/files/english\\_paris\\_agreement.pdf](https://unfccc.int/sites/default/files/english_paris_agreement.pdf)

<sup>7</sup> Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, A new Industrial Strategy for a globally competitive, green and digital Europe, COM (2020) 102 final

<sup>8</sup> Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, A new Circular Economy Action Plan For a cleaner and more competitive Europe. COM (2020) 98 final

<sup>9</sup> COM 381, 2020. Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions. A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system. Brussels, 20.05.2020

<sup>10</sup> COM 380, 2020. Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions EU Biodiversity Strategy for 2030 Bringing nature back into our lives. Brussels, 20.05.2020

**Unlike previous strategies, these new green policies are accompanied by strong financial programs to foster their implementation.** The Multiannual Financial Framework (MFF 2021-2027) and the Next Generation EU have foreseen 30% of the 1.8 trillion Euro budget for measures addressing climate change, natural resources and environment. Moreover, the EU Green Deal Investment Plan<sup>11</sup> aims to use part of the MFF and mobilize additional funding to facilitate sustainable investments and the transition to a climate-neutral, green, competitive and inclusive economy over the next decade.

### **The River Basin Management Plan – a key instrument for the revival of aquatic biodiversity**

The Water Framework Directive provides the needed tool to facilitate implementation of biodiversity restoration: the River Basin Management Plan (RBMP) is key to integrate water policy with objectives of Nature Directives<sup>12</sup>. However, the Water Fitness check of the European Commission highlights the lack of political will, funding and integration with sectorial policies<sup>13</sup>, meaning that **enhanced efforts are needed to integrate water and nature directives.**

The new multiannual financial framework links the use of EU funds to sustainable investments in EU Member States and has an explicit biodiversity target. Moreover, trans-national cooperation is stimulated in the new funding programs.

The Danube River Basin Management Plan (DRBMP) is supposed to address the pressures identified at Danube basin level to support the achievement of the good ecological status of water bodies, to integrate the objectives of Nature Directives, and to achieve a favorable conservation status in the related Natura 2000 areas, including habitats and species of community importance. While the legal and financial framework for the restoration of aquatic biodiversity in the DRBMP 2021 is provided, the Programs of Measures usually include only few measures supporting aquatic biodiversity. They address mostly pollution reduction, fish passages and buffer-strips along rivers, while specific monitoring programs for endangered habitats and species, identification and reduction of major threats and protection of key habitats and endangered species are not addressed.

One of the key EU recommendations after the Water Fitness check<sup>12</sup> was to call on Member States to improve stakeholder involvement in implementation of the RBMPs. Strengthening the cooperation between water authorities and biodiversity/ecology experts could bring twofold benefits, contributing to a better integration of water and nature directives, and to the revival of aquatic biodiversity.

#### **Taking into account that:**

- Many of the recent EU policy documents support nature restoration, including aquatic biodiversity,
- The recently adopted MFF and Next Generation EU provide effective funding opportunities for nature restoration measures,
- The EC reports on implementation of water and nature directives highlight the need to enhance integration efforts, making clear that current measures are not sufficient,
- The DRBMP Program of Measures was elaborated before the release of these documents and, therefore, the opportunities provided by the recent policy/financial frames are not considered in the next WFD implementation cycle (2021-2027),

#### **The IAD recommends:**

- To urgently establish a **Freshwater Biodiversity Task Group** within the ICPDR to harmonize integration of water and nature directives with legal and financial opportunities provided by the new planning cycle,
- To **enhance the dialogue between water/biodiversity experts at national level** and identify the best measures to maintain the hydromorphological integrity of free-flowing river sectors and lakes and support aquatic biodiversity restoration, to be included in the RBMPs,
- To explore the possibility to **use the new funding opportunities** for restoring critically endangered aquatic species and habitats, establishing new ecological corridors and protected areas, and improving their protection status,
- To **foresee an adaptive management** and gradually **include the new measures addressing biodiversity integration** into the DRBMP in the up-coming years, in order not to lose another six years for nature conservation,
- To urgently launch coordinated research activities on **aquatic biodiversity status** in the Danube River Basin and possibility to **declare freshwater biodiversity a Significant Water Management Issue (SWMI)** in the Danube Basin.

Contact:

Dr. Cristina Sandu, International Association for Danube Research, [cristina.sandu@danube-iad.eu](mailto:cristina.sandu@danube-iad.eu), tel: +40.723.396.380

<sup>11</sup> Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, Sustainable Europe Investment Plan, European Green Deal Investment Plan, COM (2020) 21 final

<sup>12</sup> WFD Art. 6, Art. 8.1 ii), Art. 11, An. IV, VI and VII detail the elements addressing nature protection to be included in the river basin management plans.

<sup>13</sup> SWD 439. 2019. Commission Staff Working Document. Fitness Check of the Water Framework Directive, Groundwater Directive, Environmental Quality Standards Directive and Floods Directive. Brussels, 10.12.2019.



## **INPUT FROM THE INLAND WATERWAY TRANSPORT SECTOR ON THE DANUBE RIVER BASIN MANAGEMENT PLAN RBMP CONSULTATION**

**The International Commission for the Protection of the River Danube ICPDR launched a stakeholder consultation on the RBMP. The IWT sector, represented by the European Barge Union, the European Skippers Organisation and the Inland Waterway Transport (IWT) Platform are pleased to submit their input on this consultation.**

### **Introduction**

The Smart Mobility Strategy (SSMS) based on the EU Green deal seeks to increase the share of Inland Waterway Transport (IWT) by 25 % by 2030 and by 50 % by 2050. The European Commission in its recently published Communication on the SSMS underlines the importance of Inland Waterway Transport as sustainable mode of transport to realize its future sustainability goals. Based upon the Green Deal a key objective is to deliver a 90% reduction in transport-related greenhouse gas emissions by 2050. Contrary to the congested roads, European waterways dispose of free capacity, offering a significant modal shift potential in line with the EU Green Deal.

On the 24th of June the European Commission published the NAIADES III Action plan: boosting future-proof European Inland Waterway Transport. As Flagship 1 it announced helping waterway managers to ensure a high level of service (Good Navigation Status) along EU inland waterway corridors by December 2031.

While calling on Member States to step up fairway rehabilitation and maintenance efforts in order to uphold and improve navigation conditions, the Commission will give more support for projects aimed at completing and upgrading the inland waterway TEN-T network and addressing bottlenecks.

### **COMMENTS ON THE DRAFT DANUBE RIVER BASIN MANAGEMENT PLAN**

#### **Danube River Basin Management Plan RBMP. Part A – Basin-wide overview. Update 2021**

The DRBD basin-wide management objectives are:

- to describe the measures that need to be taken to reduce/eliminate existing significant pressures for each SWMI and groundwater on the basin-wide scale and
- to help to bridge the gap between measures on the national level and their agreed coordination on the basin-wide level to achieve the overall WFD environmental objective.

To make full use of the European waterways and to shift transport from congested roads on inland vessels a high-quality and climate resilient waterway network is needed. The IWT sector is depending on fit-for-purpose infrastructure to allow the absorption of higher volumes of freights and passengers on European rivers in line with the above EU policies and sustainability goals.



The IWT sector therefore welcomes the draft update of the RBMP which considers inland navigation as an important sustainable water use.

Climate change will bring new challenges for the inland navigation sector, notably in relation to water quantity. The draft update recognizes that ensuring the continued safety of inland navigation is a challenge that needs to be addressed as a climate change-related risk. Some of the effects of climate change (drought, water scarcity, extreme hydrological phenomena and other impacts) are clearly of great relevance to the inland navigation sector.

Therefore, the IWT sector aims to be properly represented in future discussions on climate change-related policies, strategies and measures, including on water quantity management (including water scarcity/drought and water allocation).

The IWT sector also appreciates the recognition that integration with other sector policies is an important issue in the Danube River Basin in order to create synergies and avoid potential conflicts.

**The IWT sector looks forward to continued engagement and further intensified exchanges, including in the context of the Joint Statement, to ensure that water resource management on the Danube supports sustainable water uses such as navigation while at the same time protecting and enhancing the water environment. It stresses the importance of full engagement with the inland navigation sector in the development and delivery of appropriate measures in the elaboration of the new RMBPs.**

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#### **EBU**

The European Barge Union (EBU) represents the inland navigation industry in Europe. Its members are the national associations of barge owners and barge operators of 9 European inland navigation countries (Austria, Belgium, Czech Republic, France, Germany, Luxemburg, Netherlands, Romania and Switzerland). [www.ebu-uenf.org](http://www.ebu-uenf.org)

#### **ESO**

The European Skippers Organisation is the voice of the independent Inland Waterway Transport entrepreneurs. ESO looks after the interests of the barge owners at European level with representatives from six European countries (Belgium, France, Germany, Netherlands, UK and Poland) [www.eso-oeb.org](http://www.eso-oeb.org)

#### **European IWT platform**

As an executive body of EBU and ESO, the European IWT platform aims at a stronger positioning of Inland Navigation in European and national transport policies by an intensified contribution to various governing bodies, working parties and standard setting committees like CESNI and ADN [www.inlandwaterwaytransport.eu](http://www.inlandwaterwaytransport.eu)

Webpage: <http://www.interreg-danube.eu/approved-projects/measures>  
Contact: [measures\\_coord@boku.ac.at](mailto:measures_coord@boku.ac.at)

September 1<sup>st</sup>, 2021

## **Request to integrate important recent results and insights of the MEASURES project to the Danube River Basin Management Plan, update 2021**

To the DRBMP-Update 2021 working-group and decision makers,

We sincerely acknowledge and appreciate the efforts within the Danube River Basin Management Plan, Update 2021, and the excellent progress already made, to promote the conservation and restoration of habitats, to improve physical and ecological connectivity and to re-establish functioning fish migration routes. We appreciate that chapter 6.7 of the draft DRBMP Update 2021 summarizes key measures needed for effective restoration of sturgeon populations; it shows that the commitment to establish fish migration across the Iron Gate dams continues and that solutions for a fish passage at Gabčíkovo are being explored. Finally, management objectives for 2027 also address well the issues of existing or potential future barriers. We recognize, that the DRBMP Update states explicitly, that transversal structures such as dams and weirs act as barriers for the migration of fish and prevent their access to habitats and spawning grounds.

We also recognize that preliminary results from the MEASURES project have already been considered in the current draft version of the DRBMP as of March 2021. This concerns in particular the inclusion of sturgeon habitats identified and compiled during the MEASURES project. Further, we welcome that the DRBMP highlights the need that Contracting Parties will be obliged to review their own activities and plans in the light of the results of the MEASURES project.

Nevertheless, we would like to strengthen the necessity of preserving and restoring migratory fish populations, their habitats and migration routes in the current DRBMP Update. Human impacts on global freshwater fish biodiversity are severe (Su et al. 2021) and the Danube River basin is no exception, especially with regard to migratory fish (Schiemer et al. 2003, Kováč 2015, JDS4 2021). Of the six long distance migratory fish considered in MEASURES<sup>1</sup>, the three sturgeon species are critically endangered. Of the nine

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<sup>1</sup> *Acipenser gueldenstaedtii*, *Acipenser stellatus*, *Huso huso*, *Alosa immculata*, *Alosa tanaica*, *Salmo labrax*

potamodromous species investigated, one is extinct<sup>2</sup> and seven are classified as endangered in at least one Danube country (MEASURES 2021a).

Hydro-morphological alterations and subsequent adverse effects on habitats and river continuity threaten migratory fish species in particular. Both features characterize long sections of the Danube River. It is expected that Future Infrastructure Projects related to hydropower use, navigation and flood protection will worsen the situation.

The MEASURES consortium promotes the idea of fully functional ecological corridors, integrating physical continuity, suitable habitats for all life stages of different migratory fish and viable fish populations. The inherent conservation and restoration of habitats and all migratory fish species and populations as ecological and cultural heritage as well as a future food and genetic resource is of particular importance.

The MEASURES consortium has developed approaches to identify important habitats for migratory fish and identified a core set of important habitats, which are presented in maps as basis for further protection as well as for planning of remediation of obstacles to migration to these habitats. Future efforts are necessary to identify further key habitats.

Based on the project results, the MEASURES consortium invites ICPDR and contracting parties to consider the subsequent lines of action with regard to restoration of river continuity, identification, restoration and protection of habitats and monitoring of migratory fish.

### **Monitoring, assessment, conservation and restoration of the ecological corridor**

Conservation and restoration of ecological corridors<sup>3</sup> should be adequately considered in any further planning and management activities. In order to account for the ecological corridor and its elements in pressure evaluation and status assessment as well as in management and planning we suggest to add:

To chapter 2.1.6.4., Future Infrastructure Projects (pag 52)

These projects, if implemented without full consideration to effects on water status, are likely to provoke impacts on water status due to hydromorphological alterations **and impediment to migratory fish and other organisms**. These projects need to be addressed accordingly and since the planning phase, it is needed to integrate **green infrastructure, nature based solutions and** mitigation measures in order to reduce/cancel the potential impacts on water status.<sup>4</sup>

To chapter 4.1., Surface Water, section Ecological status/ecological potential (pag. 67)

Ecological status results from assessment of the biological status of all WFD biological quality elements (fish, benthic invertebrates, phytoplankton, phytobenthos and macrophytes) and the supportive physico- chemical parameters (general and specific pollutants) as well as hydromorphological parameters (hydrological regime, river continuity and morphological

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<sup>2</sup> *Acipenser nudiventris*

<sup>3</sup> The concept of a river basin as an ecological corridor encompasses the physical waterbody as a migration route or passageway for aquatic organisms, different categories of habitat, its inherent habitat use and “habitat-using”- fish populations, as well as all processes and exchanges like information (e.g. behavioural, genetic), turnovers (e.g. energy, biomass, bed load) necessary for the ecological functioning of the system to support viable populations of native fish and migratory species.

<sup>4</sup> Suggested amendments highlighted in blue



conditions, [i.e. of habitats and the ecological corridor](#)), following the principles stipulated in the WFD Annex V.

To chapter 4.1.6., Gaps and Uncertainties of Status Assessment of Surface Water Bodies (pag. 80 – 81, paragraphs three and four):

The way forward presented in the DRBMP Update 2015 necessitated that the missing sampling and assessment methods shall be developed and that the already existing sampling and assessment methods should be transferred between the countries and adapted to the local needs. Special attention was suggested to be given to further development of ecological assessment methods for phytobenthos, phytoplankton, macrophytes and fish. [The Danube Migratory Fish Habitat Manual developed in MEASURES can serve as a valuable basis \(MEASURES 2021b\)](#). Information exchange between the national experts was considered to be an important prerequisite for this process. All these recommendations had been materialised during the JDS4. The new active approach applied in JDS4, which included the training workshops for each biological quality element organized prior to the survey, provided an excellent opportunity for harmonization and training in WFD related monitoring. Some uncertainties concerning fish assessment are remaining though.

In addition, there is a lack of experiences with methods for ecological potential assessment for HMWB stretches of the Danube and its tributaries (including reservoirs). Future activities have to be focused on sharing knowledge [and harmonizing methods](#) among the Danube countries on the assessment methods for the ecological potential for relevant biological communities (especially for benthic invertebrates and fish). This should include experience with MEP setting and selection of relevant BQE and relevant metrics.

To chapter 6.3., River Basin Management and Nature Protection (pag. 93):

Infrastructure projects, which are fully or partly located in protected freshwater habitats and which are likely to have a significant effect must be carefully planned and assessed in order to avoid conflicts. [Promoting Green Infrastructure and nature based solutions should be the basis of any planning](#). EU Habitats Directive Article 6(3) provides for an appropriate assessment of the impacts of such plans or projects.

To chapter 6.4., Inland Navigation and the Environment (pag. 96), add the following bullet point to the existing list

- [Promote as much as possible green infrastructure and nature based solutions](#)

To chapter 8.1.5.3.1, River Morphological Alterations (pag. 146), section Management Objectives, add the following bullet point

- [Ensure that habitats already identified by MEASURES as critical are protected with the set of legislation in place at the national as well as at the international level \(e.g. Natura 2000/FFH Directive; Nature Restoration Laws\)](#)
- [Complete the map produced by MEASURES of habitats for migratory fish species and their protection status](#)
- [Ensure that management plans are in place for these habitats and they consider the needs of migratory fish](#)

- Allocate appropriate resources to continue identification of habitats of key importance for migratory fish and to monitor progress;
- Ensure that location and extent of measures foreseen for implementation by 2027 to improve river morphology by identification, protection or restoration of habitats are specified by each country
- Establish working relations with authorities responsible for nature protection and biodiversity in Contracting parties to implement these measures
- Extend working relations with the Black Sea Commission to successfully address the improvement of (long distance) migratory fish populations
- Support regular monitoring of migratory fish populations and habitat status to detect changes and allow for effective management measures.
- Include monitoring of migratory fish into the scope of ICPDRs Transnational monitoring and devote a separate section of the “TMNM Yearbook” to migratory fish
- Mandate a working group to design a Danube wide network of monitoring sites and a monitoring program tailored to migratory fish (building on monitoring of fish already in place to meet requirements of EU Water Framework Directive and Nature Conservation legislation).

### **Eliminate or mitigate the effects of migration barriers**

In order to further improve longitudinal connectivity, the assessment of barriers and to decrease their impact on the ecological corridor we recommend to add to chapter 8.1.5.2.1, Interruption of River Continuity for Fish Migration (pag. 138), section Management Objectives, the following bullet points:

- Iron Gate dams as key obstacle for migration of fish from Lower Danube to Middle Danube and Gabčíkovo-dam as key obstacle for migration of fish from the Middle Danube to the Upper Danube Remain are top priorities in the Danube River Basin Management Plans for the period 2021 -2027.
- Address other obstacles blocking access to habitats already identified as critical by MEASURES equally in the national (and where appropriate: International) river basin management plans
- Explore opportunities for removal of barriers as a first choice
- Allocate sufficient funds for remediation of these obstacles
- Ensure that appropriate mechanisms are in place (such as periodical reporting in Annual meetings of ICPDR on progress) to avoid further delays in remediation
- Allocate appropriate resources to ensure that ecological corridors in large rivers work well for upstream migration as well as for downstream migration, whereas several open questions still need clarification
- Standardize and harmonize methodologies for assessment, implementation and function control of barrier / dam removal as well as for establishing passing solutions and communicate these methods among experts and cross-sectoral groups.
- Ensure that fish-migration aids at bottlenecks of key importance for the entire Danube Basin (e.g. Iron Gates, Gabčíkovo...) as well as of high importance at the regional level are monitored (including continuous / automatic registration of migrating fish) to prove that fish migration aids work properly, that ecological corridors and measures



taken (such as e.g. supporting stocking efforts) deliver and to get indications of populations of migratory fish in place.

- For ecological prioritization of measures for river continuity restoration the creation of coherent stretches of ecological corridors should be taken into account, i.e. sections, which link important habitats and populations within the Danube as well as towards/within tributaries; linking Black Sea and Danube.

### **Strengthen inter-sectoral exchange and cooperation on transboundary and basin-wide scale**

MEASURES has proven the effectiveness of national cooperation via a series of national workshops, to which stakeholders from different sectors were invited and attended. We think the networks established should be strengthened, in particular as we see also potential for future transboundary and international exchange. Therefore, we propose

To add to chapter 6, Integration Issues (pag. 90), after the first sentence as follows:

The integration with other sector policies is an important issue in the Danube River Basin in order to create synergies and avoid potential conflicts. Activities are ongoing to continuously implement and further intensify the exchange with different sectors such as inland navigation, hydropower, agriculture, and nature protection including sturgeon conservation activities. [The Local Migratory Fish Networks established in several Danube countries in the MEASURES project](#) have proven to be good platforms for stakeholder discussion and debates on a specific target and can be used as a basis for future efforts.

To add to chapter 5.1. Management Objectives (pag. 88-89):

b. help to bridge the gap between measures on the national level and their agreed coordination on the basin-wide level to achieve the overall WFD environmental objective. [This requires the identification of opportunities for basin-wide level exchange of different sectors.](#)

To chapter 6. Integration Issues (pag. 90):

The integration with other sector policies is an important issue in the Danube River Basin in order to create synergies and avoid potential conflicts. Activities are ongoing to continuously implement and further intensify the exchange with different sectors such as inland navigation, hydropower, agriculture, and nature protection including sturgeon conservation activities. [Opportunities for basin-wide level exchange of different sectors have to be identified and agreed upon.](#)

Finally, we would like to emphasize that MEASURES has prepared a manual for genetic conservation for Danube sturgeons. Therefore, we would like to propose adding to the chap. 6.7., Sturgeon Conservation, second box (Ex-Situ Conservation Hatcheries Project Upper Danube), on pag. 104:

**MEASURES**

A genetic conservation manual for ex-situ Danube sturgeon live gene stocks to assist the development of supportive restocking (MEASURES 2021c) and guidelines for ex-situ facilities have been developed.

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## **Input to the ICPDR public consultation on the draft Danube River Basin Management Plan 2021 update**

Danube-Tisa river basin, September 29, 2021

On behalf of the DTP Interreg Tid(y)Up consortium, hereby, we submit our comments and inputs to the draft of the Danube River Basin Management Plan 2021 update (DRBMP).

The Tid(y)Up project aims to reduce the plastic pollution in one of Europe's most heavily contaminated rivers, the Tisza, and investigates plastic pollution and its effect on the Danube and the Black Sea. Currently there are no standard methods and consistent data available on plastic pollution of rivers in the Danube Basin that would help harmonized actions of water management authorities and allow cooperation with other sectors. In Tid(y)Up, project partners develop and launch a set of integrated actions, consult and provide tools for relevant stakeholders and initiate long term transboundary and intersectoral cooperation with the aim of monitoring and eliminating the plastic pollution. The partnership of Tid(y)Up will carry out field trips, expeditions, pilot actions to identify and restore polluted areas, as well as education and awareness raising actions for prevention. The focus is to gather all necessary information, raise awareness of the relevant actors and provide them with practical tools to create active, cooperating communities in the fight against the plastic waste contamination and contribute to the work of water authorities to improve water quality by providing input for the upcoming revision of DRBMP. Project co-funded by European Union funds (ERDF, IPA, ENI).

Partners of the project are:

- Filmjungle.eu Society (Lead partner), Hungary
- Association of Environmental Enterprises (ERDF partner), Hungary
- Institute of Oceanology – Bulgarian Academy of Science (ERDF partner), Bulgaria
- Multisalva Association (ERDF partner), Romania
- University of Life Sciences and Natural Resources, Vienna (ERDF partner), Austria
- Agency for the Support of Regional Development Košice n.o. (ERDF partner), Slovakia
- General Directorate of Water Management (ERDF partner), Hungary
- Faculty of Technical Sciences Novi Sad (IPA partner), Serbia
- For the nature- and environmental protection – PAPILIO (ENI-UA partner), Ukraine
- Agency of Regional Development Cross Border Cooperation “Transcarpathia” of Zakarpatska Oblast Council (ENI-UA partner), Ukraine

The partnership offers its best knowledge for the solving of the plastic flooding. Geographically we cover the whole Tisa basin, probably the most polluted river system of the Danube river system, and beyond where we all are committed to save our rivers.

In general, the partners welcome the dedicated chapter 2.1.9.3 of the draft DRBMP on the plastic pollution issue and recognize that the thereby mentioned topics and knowledge gaps are well aligned with the activities of the project. Hence, in the followings we detail how our experiences and the project outcomes contribute to tackling this serious environmental issue.

As ICPDR is an important associated partner of the project, we will keep informing Mr Ádám Kovács, our contact point about future project events (some of them also mentioned below) with the hope of welcoming the experts of ICPDR also in the frontline of the fight against plastic pollution.

In this section we detail our specific work and contribution in relation to the below topics as mentioned explicitly in the aforementioned chapter. The partnership is keen to provide further details upon request about any of the items detailed below in case the ICPDR is interested to learn more and/or to integrate any of the below suggestions into the next version of the DRBMP.

### **Topic #1**

#### **Scarce is also information about the occurrence of microplastics in the Danube River Basin**

An increasing number of investigations on microplastic pollution in Danube and Tisa river system have been carried out recently. However, there is a lack of general and, above all, comparable data. Different, not standardised sampling methods as well as sample preparation and analysis procedures make a comparison of the results difficult.

Within the Tid(y)Up project 3 sampling methods are tested under varying boundary conditions:

- Multiple depths net-method: simultaneous net sampling with mesh sizes of 500  $\mu\text{m}$  and 250  $\mu\text{m}$  in three different depths of the water column. Advantages are that within short timeframes huge amounts of water can be investigated in parallel in 3 depths ( $\approx 3,000 \text{ m}^3$  of water per net and  $15,000 \text{ m}^3$  per sampling point within approximately 45 minutes). Disadvantages are mainly the need of a bridge or a vessel for sampling and the heterogenous sample composition which greatly increases the effort for sample preparation for analysis.
- Pump-method: sampling with a 1 mm pre-filter with subsequent cascade filtration down to 300 $\mu\text{m}$ , 100 $\mu\text{m}$  and 50  $\mu\text{m}$ ; applicable in varying depths of water column, sample volume 1000-2000 litres depending on suspended solids.
- Sedimentation-box: sampling close to water surface for approximately 2 weeks; it was also used within the Joint-Danube-Survey.

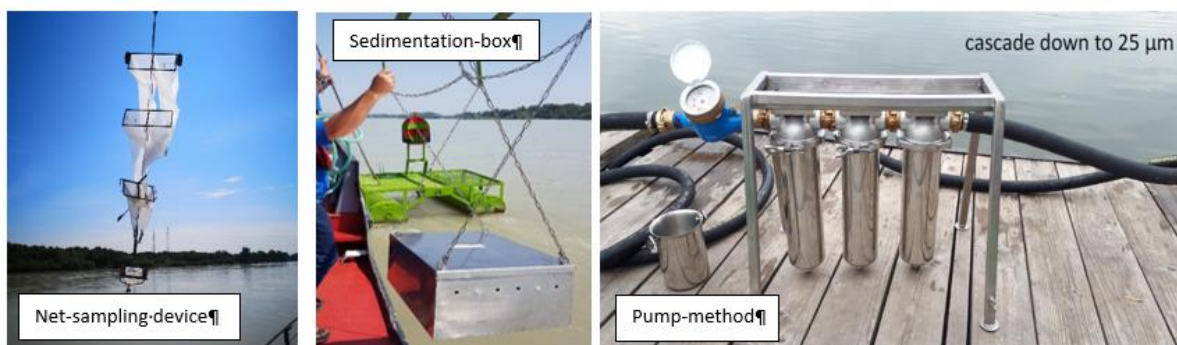


Figure 1 – Devices of the 3 sampling methods applied and compared within the Tid(y)Up project

The suitability of these methods in field application, ease of use, error-proneness and cost-efficiency is investigated. This is because future and regular monitoring of microplastics

requires a move away from sophisticated scientific methods towards easily applicable and reproducible results. Also, the potential to generate meaningful information about microplastic-pollution will be assessed. It seems that none of the method itself meets the requirements of representative sampling. Ideally, therefore, several test methods are used in parallel, whose individual advantages compensate for the disadvantages of the respective other method.

Inspired by the JDS4 sampling sites, microplastics measurements were performed in Danube river in Hainburg (AT), Budapest (HU), Bezdán (RS), Pancevo (RS), Ruse (RO/BG), Tutrakan (RO/BG) as well as in the Tisa river (upper course, Kisköre, HU) and close to the estuary (Titel, RS) from March to July 2021. Primary objective of the sampling campaign was to compare the different methods and to get a rough picture of the microplastics pollution situation in the Danube and Tisa rivers. According to previous studies, the content of microplastics in flowing waters can vary greatly depending on flow velocity or discharge, water depth and positioning in the transverse profile of the river (influence of groyne fields, etc.). To consider the depth variance and spatial distribution of microplastics, sampling was performed across the river cross-section and at different depths.

As samples taken with above described sampling methods differ in terms of number and size of captured plastic particles, content and size of organic and inorganic impurities, sampled water volume, sample time and sample depth, different further sample treatment is required. Practicable and user-friendly sample preparation and analysis protocols that allow inter-laboratory comparisons are therefore now being developed for each sample type and applied within project to roughly assess microplastic pollution situation along Danube and Tisa rivers. The different significance of the results obtained with the protocols should always be considered and in future the right procedure should be selected for particular questionings.

While our research focuses on finding the optimal sampling and measurement methods for microplastics, it is also crucial to setup a unified, regular monitoring system of microplastics emitters, including wastewater and surface waters sources, too. It is essential to localise the main sources of pollution: highways, wastewater treatment plans, factories, and rainwater drainages. Once localised, research is needed which Selective Filtration Technology is the best for further development to filter out oil and microplastic contamination before entering living water bodies.

## **Topic #2**

***The level of awareness of the riverine litter varies between the Danube countries but in majority of the countries, it is considered as a topic of growing importance***

Recognizing the importance of awareness raising, the Tid(y)Up project also develops and operates with a variety of tools to reach different target groups and catalyse further actions. Hereby, we detail two tools for awareness raising, however, this does not exclude other important tools for awareness raising such as short movies and social media activities which are regularly carried out when organizing project and cleanup activities.

For the stakeholder community of the river basin, the periodic roundtable meetings serve as an open exchange of experiences and for the coordination of their river protection activities. Within the project multiple round table meetings will be organized in all participating countries involving the respective stakeholders with capability to act for cleaner rivers.



The invited target groups are:

- representatives of the national and regional bodies and authorities responsible for water quality and/or waste management in the countries concerned,
- public and non-governmental organizations which organize and carry out river cleaning in practice,
- waste collection and treatment service providers.

Usually, participants present their water protection, river management, waste collection and treatment activities and the results achieved. Knowledge sharing and cooperation are also beneficial in terms of saving and harmonizing human and financial resources and make river protection efforts more effective through coordinated action. Discussion topics and special facilitation is provided for the event to ease active involvement of participants and collect ideas. This format is suitable to find partners and discuss actions aiming to tackle plastic pollution, such as to coordinate flood prevention and post-flood cleanup tasks, and to standardize detection and measurement techniques for sources and components of pollutants, and ultimately to link individual sub-basin management plans. Later, the organizations cooperating here can apply together for financing much more easily or solve cross-border challenges and tasks. For example, the Plastic Cup found sponsors for some of its activities on these occasions.

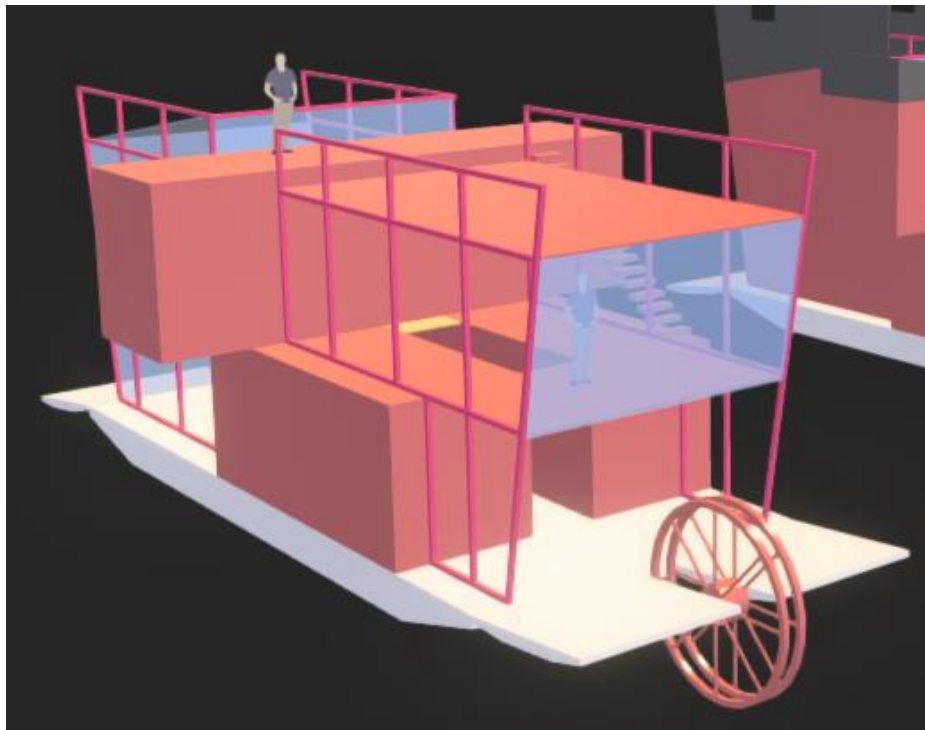
In relation to the project, the first round table meeting already took place on 13<sup>th</sup> of September 2021, in Tokaj, Hungary as a follow-up of the 2<sup>nd</sup> Plastic Cup on Bodrog river. Emphasizing the role of international cooperation in solving the plastic pollution issue, participants also joined from Ukraine and Romania who also presented their efforts to stop the pollution. To keep to participants updated, after the event they usually receive a summary description about the topics covered and outcomes. This also happened after the first round table meeting.



*Figure 2 – Plenary presentation on the first round table meeting of the Tid(y)Up project, 13<sup>th</sup> September 2021 in Tokaj, Hungary*

As proven to be a good tool to catalyze cooperation for the complex problem of plastic pollution, similar international consultations are suggested to hold in the Danube River Basin on a regular basis, semi-annually or every year in a different country or region. It is important that this takes place in a non-governmental organization, so that the organization is faster, looser, and the event can be less formal, but can be a useful complement to cross-border negotiations.

The Tid(y)Up project also targets the general public, including kids in order to raise awareness about transnational river pollution and initiate change in consumption habits, home waste management and generating closer links to the rivers. The main outcome of this type of activities is the Floating Exhibition which is going to visit at least 5 countries in the Danube basin. The multilingual exhibition, built of mostly recycled and reclaimed materials will be travelling on a renewed ferry boat. Videos, installations on the origin, magnitude, distribution of plastic floods will introduce the problem to the public, along with possible resolutions such as innovative recycling. In general, it is essential to target the public and younger generation, to tackle to roots of the problem with minimizing waste generation and promoting selective collection.



*Figure 3 – Concept design of the Floating Exhibition*

Apart from the Floating Exhibition, Plastic Cup already has a large scale awareness raising infrastructure. This is the container based and moveable Plastic Lab where schoolchildren can observe and experience the magical transformation of plastic waste into different object (such as pen, carabiner, ruler, etc.). The Plastic Lab has been on the route since its finalization of May 2021 and then reached many pupils in Hungary and in Transcarpathia. More information about it available at (in Hungarian) [https://petkupa.hu/hu\\_HU/muanvagmuhely](https://petkupa.hu/hu_HU/muanvagmuhely).



Figure 4 – The Plastic Lab in action showing pupils the magical transformation of plastic waste

### Topic #3

*It is also necessary to mention that in several Danube countries, the riverine litter management is not addressed as a selfstanding topic, but it is covered by a national strategy for waste management.*

In the Tid(y)Up project, the partnership carried out a comprehensive assessment of the legal situation of all pieces of legislation which prevent, affect, and tackle the plastic pollution of waters. This work includes the aspects of waste management and water management, too. Based on the analysis, in some cases, the legislation already mentions the complex issue of plastic pollution. For example, we can mention the Hungarian “Climate and Nature Protection Action Plan” issued in 2020, the objectives of which include protecting our rivers from waste, eliminating illegal landfills, making the beverage packaging take-back system mandatory and restricting and banning the use of disposable plastic products. From a regulatory point of view, the measures to achieve these are set out in the Waste Act and its implementing rules.

Based on the assessment we compiled a set of recommendations to improve the legal environment in favour of tackling plastic pollution in the Danube Region. Those recommendations are presented here according to the waste hierarchy. The main aim of the legal situation analysis and below recommendations is to enforce laws for the more effective actions on prevention of illegal waste disposal, as well as measures to help the collection, removal and disposal of riverine waste with considering also the potential environmental impacts of the intervention. River basin management plans are an important tool for transnational implementation of some of the below suggestions, therefore the partnership is happy to engage into more detailed discussion upon request.

### Prevention measures

1. Compliance with the existing laws focused on prevention of macro- and microplastics emissions into the environment with particular focus on transposition of the Directive (EU) 2019/904 (Directive on single-use plastics) into national legislation (e.g. expansion of plastic collection and recycling rates, extension of producer responsibility



and further obligations in product design, bans of plastic products, strengthening of reusable quotas, heavier penalties for improper disposal, etc.). Update and improvement of sectoral policies to prohibit single plastics use and introduction of a deposit scheme for PET beverage bottles to fulfil the EU 90% collection target by 2029. Mandatory marking of the material type of plastic products for helping the separated collection and recycling.

2. Establishment of legal framework for environmental violations, as well as sanctioning mechanisms and instruments to be introduced along with identification, sanctioning and prevention of illegal dumpsites. Restrictions on the emission of microplastics and examination of the use of biodegradable plastics for product segments where the release into the environment cannot be avoided.

### **Removal of pollution and restoration of natural habitats**

3. Considering environmental impacts of planned cleanup activities instead of establishing permanent, large scale concrete structures affecting the river flow and ecosystem. Instead of those structures, it is suggested to examine the possibility of modular temporary structures to be applied in rivers only when the plastic flood comes helping cleanup activities. Before implementation of physical barriers to trap plastic pollution it is suggested to conduct cost-benefit and environmental impact assessment.
4. In relation to that, it is necessary to disseminate existing best practices for litter trapping and cleanups to involve more and more stakeholders. Promotion of good practices for cooperation between different organizations in operating such infrastructures is also crucial as no one alone can tackle this problem. On one of the most polluted affluent river of the Danube, the Tisa river, special waste management points were established in cooperation between water authorities, NGOs and companies. These points start operating in a quick response to the approaching plastic floods and able to remove hundreds of tonnes of organic and inorganic riverine waste. The Water Authorities, along with NGOs like the Plastic Cup initiative, target also the plastic deposits along the shorelines
5. Establishment of a harmonized monitoring system for macro- and microplastic pollution (including unifying definitions and standardizing sampling, testing and evaluation procedures).
6. In case of construction of new and modernization of existing wastewater treatment plant it is important to ensure reliable, secure disposal and appropriate treatment of wastewater, including micro- and macro-plastics removal and treatment.

### **Legal consequences**

7. Establishment of legal enforcement plan and transboundary monitoring system (early warning system) of riverine pollution (plastic, communal, hazardous, etc.).
8. The water bodies (rivers, big lakes) need have a type of joint protection and representation, legal entity, as some believe that granting legal status to water bodies might help the better enforcement of environmental protection. For granting rights to a river, the Whanganui River of New Zealand is a good example which act is based on 140-year-old mauri traditions.

9. It is crucial to define better the responsibility for elimination of water pollution and the handling of the collected waste. Who is responsible for the removal, the recycling or disposal? And who bears the costs? The collector of the waste, the Water Directorate, the municipality, or the waste management service providers? Budget and resources need to be ensured for eliminating pollutions and handling of the waste.

### **Awareness-raising and dissemination**

10. Enhancement of awareness-raising, education, and communication campaigns with involvement of stakeholders (decision-makers, manufacturers, general public, NGOs, etc.) are necessary with also effort to disseminating the methods and results. For details on awareness raising outcomes of the project please refer to the respective topic.

### **Topic #4**

*Some knowledge regarding quantities (and/or types) of litter in national riverine systems is available in DE, AT, HU and SI while the knowledge on sources and pathways of litter into national riverine systems is rare and is subject of ongoing or intended research activities*

GPS-tagged floating items offer a good opportunity to gain new insights into the transport processes of macro plastics or to validate transport simulation models as well. Already two partners of the Tid(y)Up project have experiences with this type of tracking. The experiences include knowledge on technology selection, development, and shortcomings, as well as movement of the plastic pollution on rivers. These tools can help to better understand the plastic flood and identify areas with great risk of deposit.

Colleagues of the University of Natural Resources and Life Sciences (Vienna, Austria) performed a series of field tests using GPS-tagged floating items (e.g. plastic bottle, XPS-panel, shoe, tennis ball) in course of the “PlasticFreeDanube” project<sup>1</sup>. The results showed that macro plastics tend to stay on the river bank where they enter the river system. It was found that particles introduced on both the right and left river banks tended to run mostly parallel to the shore without switching to the opposite bank. As almost all of the tributaries in the project area western from Vienna (e.g. Danube Canal, Schwechat, Fischa) enter the Danube on the right side after flowing through densely populated areas, it is very likely that macro plastics from these sources end up on the right bank of the Danube.

With 40%, most strandings were found on fixed banks followed by groyne fields (37 %). This is due to the fact that between Vienna and Bratislava about 70% of the river banks are characterized by fixed embankments with riprap stones. In addition, the frequently encountered groyne fields on both banks of the Danube lead to flow deflections in the direction of the shoreline and thus to stranding.

The first findings revealed travel distances with respect to the used item ranged between 7.1 km to 15.7 km with an average value of 10.4 km per stranding. At higher discharges, a higher stranding probability was observed due to the stronger interaction between the main channel and groyne fields.

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<sup>1</sup> <https://plasticfreeconnected.com/>

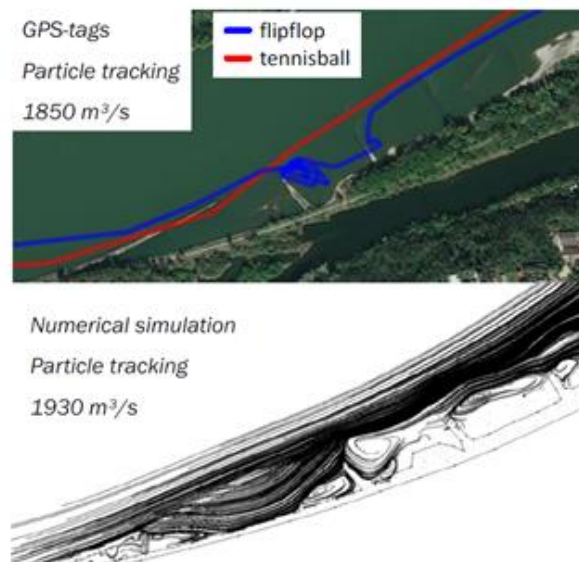


Figure 5 – Comparison of particle tracks derived from field survey (up) and numerical simulations (bottom)

As shown in Figure 5, also good correlation between simulated particle tracks and detected flow paths during the field survey was obtained. Tagged macro plastic items were found to strand in zones detected as accumulations zones in the numerical model. Accumulation zones found in GPS-tag stranding areas.

A second tracer study was conducted in the end of December 2020 with the aim to estimate the retention potential of a hydropower plant (HPPs) in Freudenu, Vienna. For discharges below 3000 m<sup>3</sup>/s, floating macro plastic seems to concentrate at the right river bank directly at the screen of the HPP (Figure 6), also illustrated within the green path in Figure 7. At this point (indicated by blue cross), larger plastics such as drink bottles, parts of insulation panels or shipping waste, etc. are removed through mechanical screen cleaning (“gondola”) or a separate gripper/crane. Plastic items smaller than the inside width of screen, e.g. foils and fragments flow through the turbines. Above 3000 m<sup>3</sup>/s, however, the weirs of the HPP are overflowed. This leads to a deflection of the floating items in the direction of the weirs. As the tracer test has shown, macro plastics can pass the HPP in this way. To counteract the litter overflows of weirs, floating booms could be a possible solution (yellow line) described e.g. by AlphaMERS Ltd. (2020), Plastic Fischer (2020) or The Litterboom Project (2020). Another option would be to position floating barriers already on tributaries to prevent macroplastics from entering the watershed.

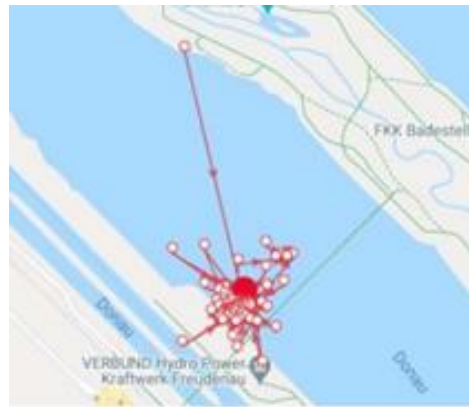


Figure 6 - Positions tracked with GPS- tagged floating macro plastic items



Figure 7 - Sketch describing a possible positioning of a floating macro plastic barrier at the HPP (left); Tracer study with GPS-tagged floating items (right) in front of the HPP Freudenau, Vienna (right)

The lead partner of the Tid(y)Up project, Filmjungle.eu Society, also the organizer of Plastic Cup has started earlier to develop and experiment with GPS tracking. The inspiration was the classic “message in a bottle” model – handwritten letters floating in a glass bottle – that showed us that an object can move hundreds of kilometres within a year. In the spring of 2019, the volunteers of Plastic Cup let go a classic bottle message – symbolically in a half litre Ukrainian vodka bottle – with a message that was found the same year at the Kisköre hydropower dam. Today it is already known that this water facility protects the lower parts of the river from a vast amount of trash.

With technology development and a combination of GPS tracking and mobile data transfer a new chapter of mapping the waste situation of our rivers has arrived. As a part of the research and development programme of Plastic Cup, researchers have released three bottles with GPS trackers, that forward real time data with showing on map their locations. With this experiment, experts are anxious to determine how far and how fast the large amount of waste delivered by rivers can move, whether they get stuck in floodplains, if they start moving again, and whether they can eventually reach the seas. This is the first known experiment where anyone can follow the journeys of plastic bottles on a public map.

These GPS bottles were developed by Waterscope Inc, innovator in domestic water-management, and collaborator of Plastic Cup for many years in water quality assessment and knowledge sharing. With current technology, the GPS tracker in the bottle signals every 15



minutes and defines the geographical coordinates. If the dislocation is more than 200 meters, the new position of the bottle will appear on the tracking map. The goal of Plastic Cup's research is to prove once and for all: the pollution of seas and oceans is a serious environmental protection case; one that should be a common responsibility, and one that affects the landlocked nations as much as the coastal ones. Our hypothesis is that some of the bottles travel all the way from inland sources to the estuaries and so forth to the oceans.

Perhaps the greatest result of the current development is that anyone can use the public map to see where the bottles are (Figure 8). With this, we can present another exciting result for our volunteers, supporters, and for the enthusiastic members of public. Analysing and using the data helps to get rid of pollution in the long term.

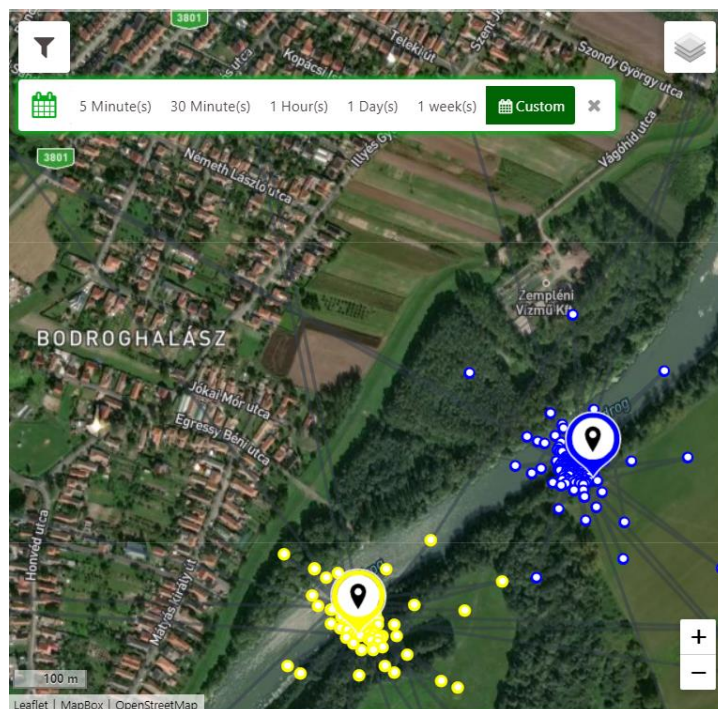


Figure 8 – Part of the public map to follow the route of the GPS bottles showing two bottles stuck in a large deposit area near Sárospatak, on Bodrog river

Currently, the GPS bottle is in the midst of a research and development process at Plastic Cup, thus experiences so far let us to conclude the followings:

- The tracking allows us to identify large deposits of riverine waste in the floodplains without personal monitoring. Based on our trials, where the GPS bottles stuck, we can expect actual plastic mines or at least hydrological and terrain conditions ideal for trapping of the waste in the floodplain in case of high water levels.
- The GPS track and routes of the bottles make it possible to compare the actual, real life data with our pollution spread hydrological model. This way the GPS records can be used to validate models.
- Observed technical shortcomings of the GPS bottles during the trials are fed back into the development process, thus by software update and better energy management those challenges will be overcome in the next version.

Experts of Plastic Cup have been also investigating the possible use of remote sensing technologies to monitor polluted areas along the river. There are promising but very early phase results with application of satellite images. This could help to find illegal landfills but as source and deposits of the plastic pollution. Until this technology does not work, walking along the river and in the floodplain is the only solution to get a complete map of the pollution. This practice has been carried out regularly by volunteers of the Plastic Cup. By using this method and based on internationally recognized smart phone application Trashout an online responsive pollution map was created on the Tisza and its affluent rivers under the domain of [www.tisztatiszaterkep.hu](http://www.tisztatiszaterkep.hu). The special feature of the map that within 1 hour of the new entry in the database of Trashout, the polluted area appears on the map, helping river cleanup actions in a lot of ways.

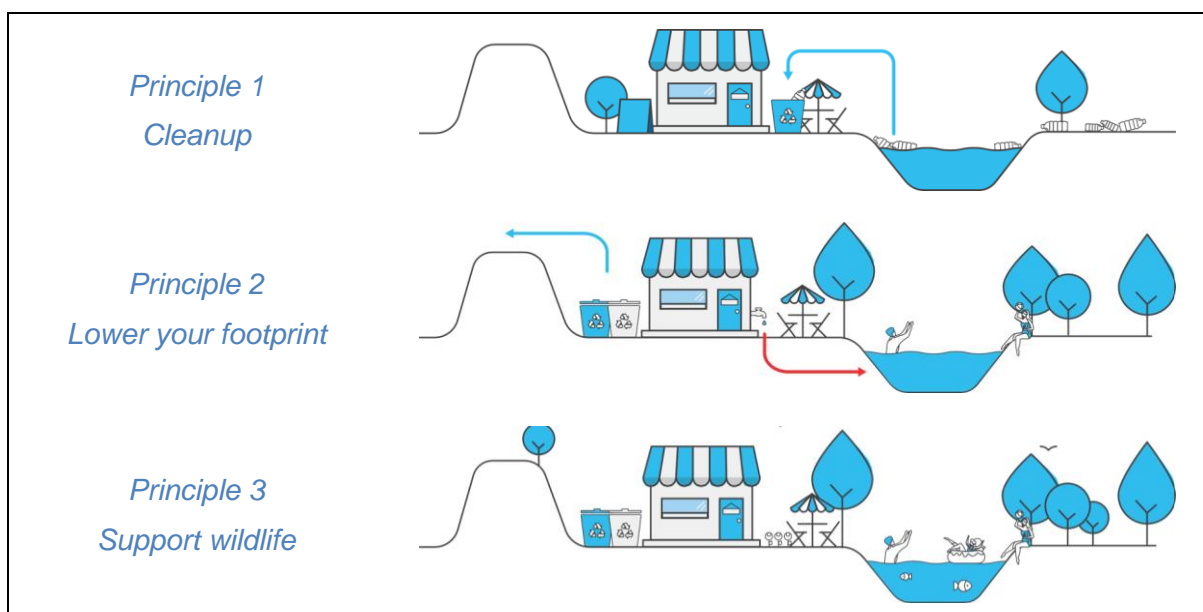
### Topic #5

#### *In general, good waste management infrastructure including separate collection systems and landfill bans*

The partners of the Tid(y)Up project have been developing a Waste Reduction Toolkit that helps local municipalities, schools, inhabitants and entrepreneurs to get hints and tips about waste prevention and learning how they can spare money and other resources with wise waste handling. Free posters and infographics will help them to disseminate the best practices.

As part of this toolkit a River Friendly and River Saver qualification system for restaurants and buffets along waterways will be developed and promoted that can help in transferring to a more sustainable catering and operation. According to field experience, shoreline buffets and restaurants can be a direct source of riverine plastic pollution. Qualifying some of these buffets and restaurants as 'River Friendly' and 'River Saver' can provide a possible solution for this problem. aims and tools of river friendly catering.

This catering scheme is based on three principles and the connected measures implemented by the restaurant or buffet.



Currently, the scheme is in concept state which will further developed during the project and involve pilot restaurants to trial real world implementation of the qualification scheme.

Plastic Cup also has an expanded partnership including organizations and individuals in Transcarpathia, the main source of the pollution, that are working on selective collection and recycling. Through its network and lobby, Plastic Cup has been supporting those initiatives in order to manage the root of the problem and prevent the pollution itself.

### **Topic #6**

#### ***Public “Cleaning days”, such initiatives not only prevent litter from entering the environment/ivers, they also raise public awareness***

General cleanups can help in cleaning our environment clean and preventing waste to get into waterways, there is a special type of cleanups targeting riverine waste and deposited riverine waste in the floodplains. The project is dedicated to providing guide and promote these kind of cleanups as a key intervention in tackling the plastic pollution.

The Transnational River Cleanup handguide written and published within the framework of Tid(y)Up project is to provide guidelines for everyone about to organize river cleanups. From the smallest, local actions to large scale international interventions, there are a wide variety of challenges and difficulties to deal with. The handbook provides practical advice, hints, and tips on how to carry out such actions and helps to manage the collected waste. To present the practical implementation of river cleanups, 4 transnational pilot cleanups are organized within the Tid(y)Up project.

The first one took place in the start of September, between Zemplin, Slovakia and Sárospatak, Hungary on the Bodrog river. Attracting more than 100 volunteers from Eastern Slovakia and Hungary, the three-days action collected 3.7 tonnes of waste from the Bodrog river and its surrounding floodplain forests and more importantly showed the importance of involvement of local actors. With the contribution of local people, water authority staff and schoolchildren the action was a great success and contributed not only to a cleaner river but awareness raising, too. This event was probably the biggest cleanup action ever organized in Slovakia.





Figure 9 – Snapshots of the first pilot cleanup action of the project on river Bodrog – part of the fleet of the cleanup with canoes and the supporting motorboat that carried the collected waste; on the board of the motorboat; and the process of sorting



The collected waste was sorted every day into separate fractions of PET bottles, metal, glass, polyethylene, municipal waste and caps from PET bottles aligned with the practice of the waste management utility for increased recycling ratio. The largest piece of waste was a couch set, which the volunteers managed to catch out of the water. The project partners organized the Slovak part in cooperation with the Slovak Water Management Company – Bodrog river management (associated partner of the project) and river rafting Agency Splavujeme.sk, while for the Hungarian part, the North-Hungarian Water Directorate (associated partner of the project) and Zöld Kör association, a local NGO were the cooperating parties. The involvement of the local water authority staff was of crucial importance on both sides of the border.

The partners will organize three further transnational cleanups: one in Transcarpathia, Ukraine, then one at the Bega river, Romania-Serbia and finally one on the lower Danube in Bulgaria-Romania. In due time, we will invite the associated partners of the project, including ICPDR. The special methodology for organizing transnational, river cleanups is definitely an asset of the project which is applicable in multiple settings within the Danube Region and beyond. Danube Region countries may all join and organise parallel cleanup and awareness raising actions in the frame of the following successful international campaigns reoccurring every year on the next dates:

- 01.02. Tisza Wildlife Remembrance Day
- 02.02. World Wetlands Day
- 03.03 World Wildlife Day
- 18.03. Global Recycling Day
- 21.03. International Day of Forests
- 22.03. World Water Day
- 22.04. Earth Day
- 10.05. Birds and Trees Day
- 15.05. World Climate Change Day
- 22.05. International Day for Biological Diversity
- 05.06. World Environment Day
- 08.06. World Oceans Day
- 29.06. International Danube Day
- 03.07. International Plastic Bag Free day
- 01-09.08. Upper Tisza Plastic Cup
- Third Saturday of September, World Clean-up Day
- 16-22.09. European Mobility Week
- 30.09. Package free day
- 10.10. Day of Composting
- Last week of November: European Week for Waste Reduction
- 12.29. International Day for Biological Diversity

The main background for the development of methodology for transnational river cleanups is the Plastic Cup initiative started and organized by lead project partner Filmjungle.eu Society. This initiative has been running since 2013. The Hungarian environmental initiative Plastic Cup can be a good example of how local communities and different target groups can be involved in actual river cleanup actions. This long distance boat race has become a tradition in the Tisza river basin attracting visitors from 4 continents. The Plastic Cup proved to be successful not only as a cleanup event collecting tonnes of plastic each event, but also shows promising results in recycling the collected waste, and in awareness raising on an international

level. As initiated by a nationally and internationally acclaimed nature film making NGO for its multi-award winning nature and environmentalist films, every important step is documented and shared with the public in form of movies. As of this, a short summary movie of Plastic Cup (Everything about the Plastic Cup) is available at <https://www.youtube.com/watch?v=cHGup-x1pas>.

## Topic #7

### Implementation of the Directive (EU) 2019/904 on the reduction of the impact of certain plastic products on the environment (Single-Use Plastics Directive, SUP)

The legal situation analysis of the project includes a brief presentation of the SUP Directive, but details of the implementation by national regulators are not yet clear in every aspect, as measures had to be taken to implement it by 3 July 2021. However, a call to the partners for proper implementation in time is being included into the recommendations.

As an example, the Hungarian regulations ordered bans on placing on the market under the SUP from 1 July 2021, extending them to light plastic carrier bags with a wall thickness of more than 15 microns and from 1 July 2023 to single use plastic cups. The consumption reduction action plans will appear in the National Waste Management Plan under negotiation for the period 2021-2027. The rules for products to be covered by the extended producer responsibility (EPR) scheme under the Directive will be laid down in a separate regulation.

It is an interesting and useful practice to track how national implementing regulations are developing and their impact, in particular regarding the implementing obligations (for example marketing ban, development of a consumption reduction plan) already approved once they enter into force.

For all countries it is an urgent task that they have to enter into force the following regulations: EPR system, deposit fee, reuse and refill systems, separate waste (and waste-water) collection from ships in harbours. In Slovakia the Act no. 302/2019 Coll. on Disposable Beverage Packaging will enter into force on 01.01.2022, which deals with the backup of disposable packaging for beverages and waste from these packaging (including cans). The amount of the deposit will be uniform for PET bottles and cans, 15 eurocents. We hope this will help not to have PET bottles and cans in nature.



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**Anhörungsverfahren 3. Zyklus WRRL – IKSD**  
**- Anhörungsdokument der Internationalen Kommission zum Schutz  
der Donau**  
**- Beteiligung der WSV**  
**- Stellungnahme der GDWS im Anhörungsverfahren**

Sehr geehrte Damen und Herren,

Die folgende Stellungnahme bezieht sich auf die am 31.03.2021 im Rahmen  
des Anhörungsverfahrens zum 3. Bewirtschaftungszyklus der WRRL im Ent-  
wurf veröffentlichte Dokumente

- Danube River Basin Management Plan
- Danube River Basin Management Plan – Annexes

### **Vorbemerkungen**

Bundeswasserstraßen nach § 1 Abs. 1 Bundeswasserstraßengesetz  
(WaStrG) stehen gemäß Art. 87 Abs. 1 Satz 1 i.V. mit Art. 89 GG im Eigentum  
und in der Verwaltungszuständigkeit der Wasserstraßen- und Schifffahrtsver-  
waltung des Bundes (WSV).

Die Unterhaltung von Bundeswasserstraßen einschließlich Zubehör (z.B.  
Schleusen, Wehre, Brücken, Schiffshebewerke und weitere Anlagen der  
WSV) ist dem Bund als Hoheitsaufgabe übertragen worden (§ 7 Abs. 1  
WaStrG), ebenso deren Aus- und Neubau (§ 12 Abs. 1 WaStrG). Die Wid-

#### **Datenschutzhinweis:**

Ihre personenbezogenen Daten werden zur weiteren Bearbeitung und Korrespondenz entsprechend der Da-  
tenschutzerklärung der GDWS verarbeitet. Diese können Sie über folgenden Link auf dem Internetauftritt der  
GDWS abrufen: <https://www.gdws.wsv.bund.de/Datenschutz>.  
Sollte Ihnen ein Abruf der Datenschutzerklärung nicht möglich sein, kann diese Ihnen auf Wunsch auch in Text-  
form übermittelt werden.

**Generaldirektion  
Wasserstraßen und  
Schifffahrt**  
Am Propstthof 51  
53121 Bonn

**Ihr Zeichen**

**Mein Zeichen**  
3800-U10-243.5

**Datum**  
23. September 2021

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mung der Bundeswasserstraßen als Verkehrsweg bestimmt ihren wegrechtlichen Status auf Dauer und bewirkt eine Zweckerhaltung, die nur im Wege einer Bestandsänderung nach § 2 WaStrG beseitigt werden kann.

Maßnahmen zur Erreichung der Ziele nach EU-WRRL an Bundeswasserstraßen dürfen den widmungsgemäßen Zweck sowie den für die Schifffahrt erforderlichen Zustand der Bundeswasserstraßen und somit die Sicherheit und Leichtigkeit des Schiffsverkehrs nicht beeinträchtigen.

Bei der Maßnahmenplanung sind die bestimmungsgemäße Nutzung, wie das Befahren der Bundeswasserstraßen mit Wasserfahrzeugen sowie das Stillliegen gemäß bundesrechtlichen Vorschriften und sonstige zulässige Nutzungen - einschließlich der Gefahrenabwehr und Havarieabwicklung - zu berücksichtigen.

Eine Überplanung der dem allgemeinen Verkehr gewidmeten Bundeswasserstraßen, einschließlich ihres Zubehörs, ist grundsätzlich unzulässig, wenn dadurch die Wahrung der hoheitlichen Aufgaben der WSV beeinträchtigt wird. Ich weise vorsorglich darauf hin, dass auch nach § 4 Nr. 4 des Bundesnaturschutzgesetzes (BNatSchG) bei Maßnahmen des Naturschutzes und der Landespflege auf Flächen, die ausschließlich oder überwiegend Zwecken der See- oder Binnenschifffahrt dienen, die bestimmungsgemäße Nutzung zu gewährleisten ist.

### **Allgemeine und grundsätzliche Anmerkungen**

Die Ausführungen dienen dem besseren Verständnis der nachfolgenden Anmerkungen zu den Anhörungsdokumenten, bedingen an sich aber keinen Überarbeitungsbedarf des Anhörungsdokumentes. Im Hinblick auf das durch die GDWS noch zu erteilende Einvernehmen gemäß § 7 Abs. 4 S. 1 WHG weise ich darauf hin, dass dessen Reichweite dem Konkretisierungsgrad des Bewirtschaftungsplans entspricht.

- **Wasserwirtschaftlicher Ausbau von Bundeswasserstraßen zur Erreichung der WRRL-Ziele**

Das „Gesetz über den wasserwirtschaftlichen Ausbau an Bundeswasserstraßen zur Erreichung der Bewirtschaftungsziele der Wasserrahmenrichtlinie“ ist am 09.06.2021 in Kraft getreten.

Das Gesetz regelt im Schwerpunkt die Übertragung der hoheitlichen Zuständigkeit für Teile des wasserwirtschaftlichen Ausbaus an Binnenwasserstraßen des Bundes von den Ländern auf die Wasserstraßen- und Schifffahrtsverwaltung des Bundes (WSV), soweit dieser Ausbau zur Erreichung der Ziele der Wasserrahmenrichtlinie (WRRL) erforderlich ist. Die Gesetzesänderung bezieht sich auf die Binnenwasserstraßen des Bundes aller Art. Die Verwaltung der Seewasserstraßen ist von der Änderung nicht betroffen. Das Gesetz enthält außerdem erstmals eine gesetzliche Definition des Begriffs „dem allgemeinen Verkehr dienend“ unter Einbeziehung der Fahrgastschifffahrt sowie Sport- und Freizeitschifffahrt mit Wasserfahrzeugen. Daneben wird die Anlage 1 zum WaStrG auf alle Binnenwasserstraßen des Bundes erweitert.

Die Zuständigkeit für die Bewirtschaftungsplanung nach Wasserrahmenrichtlinie sowie für Maßnahmen, die überwiegend zum Zwecke des Hochwasserschutzes oder der Verbesserung der chemischen oder physikalischen Qualität des Wassers durchgeführt werden, verbleibt bei den Bundesländern.



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Maßnahmen, die zur Erreichung der Bewirtschaftungsziele nach Maßgabe der §§ 27 bis 31 WHG erforderlich sind und mit einer wesentlichen Umgestaltung einer Binnenwasserstraße oder ihrer Ufer verbunden sind, sind mit Inkrafttreten des Gesetzes unter den Voraussetzungen des § 12 Abs. 2 S. 1 Nr. 3 WaStrG eine Hoheitsaufgabe der WSV. Zu den Maßnahmen nach § 12 Abs. 2 S. 1 Nr. 3 WaStrG gehören auch solche Maßnahmen, bei denen Gewässerteile nach § 1 Abs. 1 Nr. 1 WaStrG entstehen, die einen räumlichen Zusammenhang mit der Binnenwasserstraße aufweisen, auch wenn sie sich vor der Ausbaumaßnahme außerhalb des Ufers der Binnenwasserstraße befanden (§ 12 Abs. 2 S. 2 WaStrG). Die Planung, Genehmigung und Umsetzung dieser Maßnahmen liegt daher in der Zuständigkeit der WSV.

- **Wiederherstellung der Ökologischen Durchgängigkeit**

Maßnahmen der WSV im Rahmen der Zuständigkeit nach § 34 Abs.3 WHG:

Gemäß § 34 Abs. 3 WHG ist die WSV verpflichtet, an den von ihr errichteten oder betriebenen Stauanlagen der Bundeswasserstraßen Maßnahmen zur Erhaltung und Wiederherstellung der Durchgängigkeit durchzuführen, soweit diese zur Erreichung der Ziele der WRRL erforderlich sind.

Informationen zur WSV-Maßnahmenplanung wurden den Bundesländern im Rahmen der nationalen Anhörung zur Verfügung gestellt und sind damit auf Seiten der Bundesländer vollumfänglich bekannt.

Die aktualisierte bundesweite Priorisierung der WSV-Maßnahmen zur Wiederherstellung der ökologischen Durchgängigkeit der Bundeswasserstraßen soll voraussichtlich Ende 2021 durch das BMVI veröffentlicht werden.

Weitere Maßnahmen zur Wiederherstellung der ökologischen Durchgängigkeit außerhalb des Priorisierungskonzeptes der WSV:

Bei Durchgängigkeitsmaßnahmen Dritter in Gewässern, die nicht oder nur anteilig Bundeswasserstraße sind (Nebengewässer oder einmündende Gewässer), die Auswirkungen auf die Bundeswasserstraße haben können, bedarf es der konkreten Abstimmung mit der WSV. Gleiches gilt für Durchgängigkeitsmaßnahmen Dritter an Anlagen, die sich im Übergang zur Bundeswasserstraße oder im Eigentum der WSV befinden.

- **Invasive Arten**

Die WSV geht insbesondere gegen invasive gebietsfremde Arten vor, soweit dies aus Gründen der Verkehrssicherung, des Gesundheitsschutzes, der Bauwerkssicherheit oder zur Sicherung der Schifffahrt erforderlich ist. Die WSV entscheidet im Rahmen ihrer hoheitlichen Tätigkeit unter Berücksichtigung der gesetzlichen Vorgaben mit fachlicher Unterstützung durch die Bundesanstalt für Gewässerkunde welche Maßnahmen durchführbar sind und setzt diese um. Soweit der Aufgabenbereich der WSV von den Maßnahmen gegen invasive, gebietsfremde Arten berührt ist, ist eine Beteiligung der WSV durch die Landesbehörden gem. § 3 Abs. 5 Satz 2 BNatSchG erforderlich.

- **Das „Bundesprogramm Blaues Band Deutschland“**

Das Bundesverkehrsministerium und das Bundesumweltministerium haben mit dem gemeinsam erarbeiteten Bundesprogramm „Blaues Band Deutschland“ einen Handlungsrahmen geschaffen, mit dem verstärkt in die Renaturierung von Bundeswasserstraßen und Auen investiert und neue Akzente in Natur- und Gewässerschutz, Hochwasservorsorge sowie Wassertourismus, Freizeitsport und Erholung gesetzt werden sollen. Das „Blaue Band“ verfolgt das Ziel, durch die Wiederherstellung ökologisch funktionsfähiger Flusslandschaften einen Biotopverbund von nationaler Bedeutung zu schaffen und damit auch Naherholung und Tourismus zu fördern. Auch an den intensiv genutzten Hauptwasserstraßen sollen Renaturierungsprojekte verwirklicht werden, soweit sie mit den verkehrlichen Zielen vereinbar sind. Da ein großer Teil der geplanten Maßnahmen für Gewässer und Ufer auf den Flächen



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des Bundes umgesetzt werden soll, wurde die WSV an den Bundeswasserstraßen mit der Umsetzung des Bundesprogramms „Blaues Band Deutschland“ beauftragt. Die Bundesanstalt für Immobilienaufgaben wird auf bundeseigenen Flächen in der Aue ebenfalls Renaturierungsmaßnahmen im Sinne des Blauen Bandes durchführen. Außerhalb der bundeseigenen Flächen, vor allem in den Auen, können Dritte wie z.B. Kommunen und Verbände Projektskizzen beim Bundesamt für Naturschutz einreichen und mit finanzieller Unterstützung durch das Förderprogramm Auen des Bundesumweltministeriums Maßnahmen zur ökologischen Aufwertung durchführen.

- **Anpassung an die Auswirkungen des Klimawandels**

Die Deutsche Anpassungsstrategie an den Klimawandel (DAS, Bundesregierung 2008) wurde veröffentlicht und mit dem Aktionsplan Anpassung (APA, Bundesregierung 2011) und den Fortschrittsberichten (Fortschrittsbericht, APA II, Bundesregierung 2015, Fortschrittsbericht mit dem APA III, Bundesregierung 2020) fortgeschrieben. Aktuell beobachtete Auswirkungen des Klimawandels in Deutschland werden im Rahmen der Deutschen Anpassungsstrategie im Monitoringbericht (UBA 2019) dargestellt.

Mit Erlass des BMVI von 2021 wurde der DAS-Basisdienst "Klima und Wasser" eingerichtet. Der DAS-Basisdienst stellt Daten über die Veränderungen einzelner Bemessungswerte bspw. der Wasserhaushaltsgrößen und der Wasserqualität infolge der Auswirkungen des Klimawandels auf der Grundlage von Klimaprojektionen für einzelne Bundeswasserstraßen zur Verfügung, um somit den Klimawandel zukünftig in die Planung mit einbeziehen zu können. Perspektivisch ist geplant, Klimaprojektionen für alle Bundeswasserstraßen für eine Vielzahl von Bemessungswerten (bspw. auch Sedimenttransport/Morphologie, Meeresspiegelanstieg und Tidedynamik) im DAS-Basisdienst zur Verfügung zu stellen.

Maßnahmen, die sich aus der Durchführung von Untersuchungen zum Klimawandel an Bundeswasserstraßen ergeben, sind mit der WSV abzustimmen. Verwiesen wird auf die Datengrundlagen im DAS-Basisdienst.

### **Generelle Anmerkung zu den Anhörungsdokumenten**

Bei der Prüfung der Unterlagen sind Unstimmigkeiten zu den nationalen Dokumenten aufgefallen. Der Transparenzansatz wird in den internationalen Anhörungsunterlagen derzeit nicht angewandt (vgl. Anmerkungen zu Annex 15).

### **Anmerkungen zum Entwurf des Danube River Basin Management Plan**

#### Kap. 2.1.6, Seite 31

**Zitat:** „morphological alterations, disconnections of adjacent wetlands/floodplains, and alterations caused by future infrastructure projects may impact water status. Also disturbed or severely altered sediment balance is addressed within hydromorphological alterations, although it has not yet been analysed in depth in relation to WFD objectives. Thus, the sediment issue is currently addressed as an intrinsic part of hydromorphological alterations (e.g. within impoundments, morphological alterations).“

**Anmerkung:** Veränderungen durch zukünftige Infrastrukturprojekte können sich nicht auf den ökologischen Zustand des Gewässers im IST-Zustand auswirken. Mit allen neuen Projekten müssen das Verschlechterungsverbot und das Verbesserungsgebot eingehalten werden. Genau das ist auch Gegenstand des kurzen Kap. 2.1.6.4. An dieser Stelle gehören die zukünftigen Infrastrukturprojekte nicht



in die Aufzählung. Zudem wären es nicht nur Infrastrukturprojekte, sondern auch andere Projekte (z.B. eine neue Wasserkraftnutzung), die geeignet sind sich (negativ) auf den Zustand des Gewässers auszuwirken. Das Kap. 2.1.6.4. mit dem Verweis, dass die Projekte nur kommen, wenn sie keine Auswirkungen haben oder Minderungsmaßnahmen mitgeplant werden, stellt dies richtig dar.

Kap. 2.4, Seite 63

**Zitat:** „With the publication of the 5th IPCC Assessment Report (...)“

**Anmerkung:** 2021 ist der 6. IPCC Bericht erschienen.

Kap. 6.4, Seite 96

**Zitat:** „In 2014, a “Fairway Rehabilitation and Maintenance Master Plan for the Danube and its navigable tributaries” was elaborated in the frame of the EU Strategy for the Danube Region.“

**Anmerkung:** Quellenangabe fehlt

**Anmerkungen zu Annex7: List of Future Infrastructure Projects**

Seite 3, Water Body: Donau von Einmündung Große Laber bis Einmündung Isar

**Zitat:** Ausbau der Wasserstraße und Verbesserung des Hochwasserschutzes zwischen Straubing und Vilshofen, Teilabschnitt 1: Straubing und Deggendorf

**Änderung:** Ausbau der Wasserstraße und Verbesserung des Hochwasserschutzes zwischen Straubing und Vilshofen, Teilabschnitt 1: Straubing **bis** Deggendorf

**Begründung:** Korrekte Bezeichnung Projekt

**Zitat:** Main purpose: Flood protection

**Änderung:** Main purpose: Flood protection, Navigation

**Begründung:** Beide Vorhaben (Ausbau der Wasserstraße und Verbesserung des Hochwasserschutzes) in einem gemeinsamen Verfahren

**Zitat:** Description: reduction flood risks, improvement for navigation (Ongoing approval procedure under public law and current measures improving flood protection)

**Änderung:** Description: Improvement of flood protection (technical measures for 100-year flood events), Improvement of navigation conditions (River engineering works - stream regulation)

**Zitat:** Project status: Officially planned

**Änderung:** Project status: Implementation of project

**Zitat:** Start implementation: not yet determined

**Änderung:** Start implementation: 2020

**Zitat:** EIA: Intended

**Änderung:** EIA: Already done

**Begründung:** UVP wurde im Rahmen des Planfeststellungsverfahrens durchgeführt

Seite 4, Water Body: Donau von Einmündung Isar bis Einmündung Vils

**Zitat:** Ausbau der Wasserstraße und Verbesserung des Hochwasserschutzes zwischen Straubing und Vilshofen, Teilabschnitt 2: Deggendorf und Vilshofen

**Änderung:** Änderung: Ausbau der Wasserstraße und Verbesserung des Hochwasserschutzes zwischen Straubing und Vilshofen, Teilabschnitt 2: Deggendorf **bis** Vilshofen

**Begründung:** Korrekte Bezeichnung Projekt

**Zitat:** Main purpose: Flood protection

**Änderung:** Main purpose: Flood protection, Navigation

**Begründung:** Beide Vorhaben (Ausbau der Wasserstraße und Verbesserung des Hochwasserschutzes) in einem gemeinsamen Verfahren

**Zitat:** Description: reduction flood risks, improvement for navigation (Ongoing approval procedure under public law and current measures improving flood protection)

**Änderung:** Description: Improvement of flood protection (technical measures for 100-year flood events), Improvement of navigation conditions (River engineering works - stream regulation)

**Zitat:** Project status: Planning under preparation

**Änderung:** Ongoing planning approval process (currently: hearing procedure, public participation)

**Zitat:** Transboundary impact: No

**Änderung:** Yes

**Begründung:** Participation Republic of Austria (Espoo-Convention)



**Zitat:** EIA: Intended

**Änderung:** EIA: In process

**Begründung:** UVP/UVU wird im Rahmen des Planfeststellungsverfahrens durchgeführt

**Anmerkungen zu Annex15: Progress on measures addressing hydromorphological alterations**

Table 4: Interruptions of river and habitat continuity

**Zitat:** DE: Number of measures to be implemented by 2021: 22; not started: 0, Planning on-going: 14; construction on-going: 0

**Anmerkung:** Die Staustufen Geisling, Kelheim und Riedenburg sind mindestens 3 Maßnahmen, die bis 2027 nicht als laufende Planungen angezeigt werden (not started: 3)

**Zusammenfassung, Schlussbemerkung**

Ich weise ausdrücklich darauf hin, dass diese Stellungnahme nicht das gemäß § 7 Abs. 4 WHG erforderliche Einvernehmen der Generaldirektion Wasserstraßen und Schifffahrt zu den eingangs genannten Dokumenten ersetzt.

Nach dem derzeitigen Kenntnisstand gehe ich davon aus, dass das Einvernehmen zu den o. g. Unterlagen unter Berücksichtigung des vorliegenden Konkretisierungsgrades der Anhörungsunterlagen erteilt werden kann, wenn die Unterlagen im Sinne der vorstehenden Änderungen und Anmerkungen überarbeitet werden.

Die Endfassung des relevanten Anhörungsdokumentes muss vor Erteilung des Einvernehmens geprüft werden. Es würde die erforderliche Bearbeitung auf Seiten der GDWS erleichtern, wenn Dokumente übermittelt werden könnten, aus denen der Umgang mit den Ausführungen dieser Stellungnahme und den in den Dokumenten vorgenommenen Änderungen ersichtlich werden. Dabei sind Änderungen aufgrund von Stellungnahmen weiterer im Anhörungsprozess Beteiligter, soweit sie die Zuständigkeiten und Aufgabenerledigung der WSV betreffen, ebenfalls von Interesse, soweit sie zu Änderungen in den Dokumenten führen.

Mit freundlichen Grüßen  
Im Auftrag

B o r g e s



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Zagreb, 24th of September 2021

**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 river 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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## **DANUBE RIVER BASIN DISTRICT MANAGEMENT PLAN – 2021 UPDATE STATEMENT OF WWF CEE**

As long-term NGO observer, WWF Central and Eastern Europe appreciates the progress that has been made in Danube river basin management planning over the past two decades such as moving sturgeon conservation, wetland restoration or climate change adaptation more into the focus. We would also like to highlight our satisfaction with the numerous opportunities provided to WWF for engaging in ICPDR discussions and processes and very much hope that such a transparent approach has been replicated at national level for this consultation round and will be applied in future river basin management processes.

### **KEY HIGHLIGHTS**

Despite the fact that there are still monitoring data gaps and filling these gaps has to continue, the scientific methods for data collection and resulting information significantly improved over the past decades. Thus the knowledge base is sufficient for the next WFD cycle to focus on **implementation**. In the following paragraphs we will highlight some implementation priorities (*please also see specific comments and editorial suggestions further down in this document*):

### **Restoration**

We believe that the need and potential for river and wetland restoration is much higher than what is in the Plan.

It is clear to us that many small scale projects may not appear in this Danube basin level plan that together might have certain impact, but believe, more larger scale projects and an implementation push are possible and necessary if the following will happen:

1. **focus on integrated solutions** that solve several problems at the same time such as flood management, drought mitigation, water quality improvement or biodiversity objectives with a longer term perspective.
2. **overcome the blockage by the agricultural sector by providing the right incentives**. This entails in particular the opening of **CAP Pillar 1 direct payments for water retention on arable land** and amendment of **land use regulations to support water retention on**

**agricultural lands**, as well as inclusion of **WFD compensation schemes in the CAP Pillar 2 for restrictions of certain land use** such as water drainage, time of seeding, or irrigation due to **conservation measures**.

3. **Building capacity** in authorities for planning and implementing restoration and conservation measures together with key sector representatives, such as agriculture, flood mitigation, nature conservation, forestry.
4. **Preparing a pipeline of projects** including feasibility studies, stakeholder engagement, and agreements with land-owners, technical design and permits and funding allocation.
5. **Allocating financial resources** e.g. from the National Recovery and Resilience budgets, the Operational Programmes and Common Agricultural Policy funding lines to the Programmes of Measures.

### **Fish biodiversity**

As the JDS4 has shown, hydromorphological pressures on fish are apparent along the whole Danube and there is no general improvement since the last Plan. However, measures that are likely to improve the status of fish are largely limited to fish passes with various levels of ambition.

Romania, to give one example, indicates as current status 116 river continuity interruptions while only 1 fish migration aid is planned. It is difficult to understand why the level of ambition is so low if e.g. Bulgaria aims for considerably more.

**We recommend countries to increase the number of measures for improving longitudinal connectivity in both Danube basin** (chapter 8.1.5.2.1 Interruption of River Continuity for fish migration) **and national plans and for the coming years as matter of priority. This entails the performance of restoration potential analyses on rivers, then preparation of a pipeline of implementation projects, including stakeholder involvements, for fish migration aids but also other measures, such as barrier removals** (especially of obsolete dams).

While sturgeon conservation is woven into several chapters of the plan - which we appreciate - we see **the need to include identification, restoration and monitoring of habitats of migratory fish species, in particular sturgeons**, in the chapter River Morphological Alterations and to commit to closer cooperation between water management authorities and authorities responsible for nature protection and biodiversity.

As the integration chapter 6.4. on navigation concludes, the **impact of vessels on fish fauna** is likely to be considerable, judging from a pilot study on the Austrian Danube. The development of **mitigation measures should therefore be included** in the Joint Programme of Measures.

### **Hydropower and navigation**

As the DRBMP states well, the implementation of the “Guiding Principles on Sustainable Hydropower Development in the Danube Basin” is behind schedule. In order to achieve a considerable change, hydropower would require a drastic transformation of operation and approaches in order to play a role in sustainable energy supply. **The DRBMP should state more clearly that new hydropower**

**infrastructure in Danube countries should be avoided as there are renewable energy alternatives with lower negative impacts on ecosystems. Therefore, financial incentives such as subsidies for new hydropower development on rivers, big or small, have to be stopped.**

The hydropower sector needs to improve environmental performance by:

- **upgrading of existing hydropower plants both in terms of power generation and environmental mitigation** (e.g. installing functioning fish passes (e.g. Iron Gates), habitat restoration) **as well as removal of dams** (esp. obsolete ones)
- **committing to biodiversity conservation objectives** (e.g. action plans for migratory fish), **sediment management, and environmental flows**
- **covering full costs for mitigation action and if that is not possible, hydropower plants have to be decommissioned.**

**Concerning inland waterway transport**, the ongoing and planned navigation infrastructure projects made clear the formidable challenges of meeting navigation as well as WFD and nature conservation objectives but also the possibility of doing so if there is a strong will. This path has to be followed. **If there are indications that previously built fairway infrastructure has negative environmental impact, mitigation measures must be planned and implemented. Missing waste treatment facilities for passenger ships and the impact of waves on fish are other challenges** to be tackled as matter of priority.

## **DETAILED COMMENTS**

### **Restoration, hydromorphology:**

- 8.1.5.1 Hydrological Alterations, hydropeaking: WWF believes that not all significant hydropeaking cases have been detected judging from field observations and the disbalance of hydropeaking reported per country (e.g. no cases in RO, 27 in AT). We therefore urge countries to spend more efforts on monitoring hydropeaking of dams (e.g. Iron Gates) and designing mitigation measures where relevant.
- *„The inter-linkage with national RBM Plans is vital for wetlands/floodplains reconnection as significant areas are expected to be reconnected also to rivers with catchment areas <4,000 km<sup>2</sup> and with surface areas <500 ha having also positive effects on the water status and habitats of larger rivers.”* (8.1.5.3.2.3 Summary of Measures of Basin-Wide Importance, page 149).

Referring to this note, due to the cumulative effect, we recommend to indicate in the Danube basin plan also the cumulative figure of areas under 500 ha/country. Otherwise the level of restoration ambition of countries cannot be properly evaluated.

- Disconnection of Adjacent Wetlands/Floodplains (chapter 8.1.5.3.2.) and Map15 – reconnection potential: The threshold of 500 ha seems too large on this map and as a result the map shows almost no reconnection potential. Due to that, map 15 is not in harmony with the chapter 6.1, 6.2, 6.3 of the draft FRMP2, since these chapters communicate significant NWRM potential and the message that countries as matter of priority are to apply NWRM wherever possible. This statement isn't confirmed by map15, if the 500 ha threshold is not decreased.

We suggest to include in the workplan of ICPDR HYMO EG to reconsider this problem and adjust messages and measures (in favour of larger NWRM ambitions).

- In the chapter on Disconnection of Adjacent Wetlands/Floodplains (chapter 8.1.5.3.2.) several countries indicated low ambition regarding restoration, although the potential for reconnection of floodplains is much higher. The plan should indicate the objective of preparing a pipeline of projects for implementation and creating (at national level) the right enabling conditions (financial, legal, capacity):

- Hungary indicates only 552 ha for Wetlands/floodplains with reconnection potential 2021 with the job already finished. Nothing is planned for 2027. In the DTP Danube Floodplain project Hungary stated 71.220 ha (712,2 km<sup>2</sup>) wetlands/floodplains with reconnection potential. We expect these areas will be included in the final plan.

HU Danube (name/potential floodplains and km<sup>2</sup>) :

Total of 395,6 km<sup>2</sup>: Szigetköz 157,1 km<sup>2</sup>, Paks 22,1km<sup>2</sup>, Veránka-island 161,7km<sup>2</sup>, Béda-Karapanca 54,7km<sup>2</sup>

HU Tisza (name/potential floodplains and km<sup>2</sup>) :

Total of 316,6 km<sup>2</sup>: Milota 20,9km<sup>2</sup>, Tiszadob 39,4km<sup>2</sup>, Tiszadorogma 31,1km<sup>2</sup>, Pély 36,2km<sup>2</sup>, Nagykörű-Szajol 40km<sup>2</sup>, Szolnok Tiszaug 91,4km<sup>2</sup>, Lakitelek-Csongrád 57,6km<sup>2</sup>

- Romania stated 21,543 ha wetlands/floodplains with reconnection potential 2021, and 2,650 ha wetlands/floodplains totally reconnected by 2027. We are aware of the intention to include the DTP Danube Floodplain project results into the final DRBMP, but would like to highlight here that the 3rd Romanian draft RBM already includes 100.000 ha as potential where the key areas, larger than 500 ha are:

Desa 8276 ha , Bistret-Bechet 27972 ha, Bechet-Tumu Magulere 30972 ha, Trainan – Zimnicea 20450 ha, Nastuleru 3169 ha, Borcea Buliga 858 ha, Garliciu 1083 ha, Tichilesti 31808 ha.

- We see low restoration ambition also in case of Slovakia. 5,117 ha Wetlands/floodplains with reconnection potential 2021, and only 7 ha (!) wetlands/floodplains totally reconnected by 2027, extension of deadline (article 4.4) on 5,110 ha.

We recommend allocating funds and capacity to develop restoration potential analyses on rivers and prepare a pipeline of projects ready for implementation. EU Structural or Recovery and Resilience Funds, CAP and other sources are available for this purpose.

- Bulgaria didn't outline any areas with restoration potential and planned measures in the draft 3rd DRBMP. However, there are wetlands included in the National action plan for Conservation of Wetlands of High Significance in Bulgaria 2013-2022 in particular Mechka fishponds (570ha) and one just below the threshold of 500 ha (Orsoya fishponds, 475 ha).

Wetlands already reconnected with Danube river but in need of additional measures for improvement of the hydrological regime according to the National action plan for Conservation of Wetlands of High Significance in Bulgaria 2013-2022 (*note: in the Action plan higher ha figures are given as they include not only the wetland itself but also other territories included in the corresponding protected site/area*).

Belene Island (Persina) Wetlands - 2200 ha

Kalimok - Brrushlen wetlands - 2000 ha

Srebarna Lake - 900 ha

- In Ukraine, 43,556 ha are stated as Wetlands/floodplains with reconnection potential 2021, but with “No measures yet indicated” while the need for floodplain reconnection was clearly highlighted in the "Yearly Report 2020 of Law Danube Basin Water Management Authority". According to WWF’s discussions with key governmental experts, a minimum of 10% of this could and should be reconnected within the next WFD cycle.
- In line with our highlights at the beginning of our statement regarding restoration, we recommend the following additional measures (with blue colour) to be specified under chapter Disconnection of Adjacent Wetlands/Floodplains (chapter 8.1.5.3.2.):

*The following management objectives will be implemented by 2027 as steps towards the vision:*

***EU Member States, Candidate Countries and Non-EU Member States:***

- ⇒ *For the DRBMP Update 2021, efforts will be continued and further measures will be identified for the conservation and restoration of existing and the restoration of former (potential) wetlands/floodplains with reconnection potential to ensure biodiversity, the good status in the connected river, flood protection, drought mitigation and pollution reduction. Beneficial effects are expected to be manifold, including improvements like the provision of fish habitats for spawning, nursery and feeding.*
  - ⇒ *Specification of number, locations and area of wetlands/floodplains that will be reconnected and restored by 2027 by each country based on restoration potential analyses making best use of the EU funded Danube Floodplain project results (see below) and other available analyses prepared in the 2nd cycle.*
  - ⇒ *Development of a pipeline of projects with applications for funding*
  - ⇒ *e.g. from the National Recovery and Resilience budgets, the Operational Programmes and Common Agricultural Policy funding shaped to more effectively support the Programmes of Measures*
  - ⇒ *engagement with agricultural policy makers towards amendment of land use regulations (where necessary) to support water retention on agricultural lands,*
- In the chapter “8.5. Financing the Joint Programme of Measures” on page 164:
  - in the table on financing instruments for EU countries, add under Hydromorphological Alterations for both “Interruption of river continuity and hydromorphological alterations” and “Reconnection of wetlands/floodplains” the instrument NextGenerationEU



- correct in the list of main EU funds eligible for different elements of floodplain and wetland restoration: “For field work: [European Regional Development Fund](#), EARDF, and LIFE+.
- add as bullet point to the paragraph starting with “Furthermore, several additional instruments/organization exist that are potentially relevant for acquiring financing in the context of WFD implementation for all pressures in the DRB”
  - [CAP Pillar 1 direct payments for water retention on arable land to provide incentives for wetland restoration](#)
  - [inclusion of WFD compensation schemes in the CAP Pillar 2 for restrictions on land use such as water drainage, time of seeding, or irrigation due to conservation measures.](#)

## Sediment

Chapter 8.1.5.2.2.2. & 8.1.5.2.2.3 :

We appreciate the knowledge base and recommendations the DTP Sediment project concluded and urge countries to allocate funds for preparation of respective measures and implementation.

We urge countries to release a ban on sediment extraction from the Danube riverbed for commercial purposes (at least in river sections part of NATURA 2000 sites with fish/aquatic invertebrate species listed for protection) .

## Fish biodiversity

- We recommend the following additional measures to include in chapter 8.1.5.2.1.1 Interruption of River Continuity for fish migration – Vision and management objectives (new wording with blue) :

⇒ *Engage with authorities responsible for energy and climate with the objective of*

*⇒ phasing out financial support schemes for hydropower*

*⇒ coupling new permits and the upgrade of existing hydropower plants with investment in up to date environmental mitigation measures in line with WFD and nature conservation policies*

⇒ *Construction of fish migration aids and other measures at existing migration barriers, as well as removing barriers to achieve/improve river continuity in the Danube River and in respective tributaries to ensure self-sustaining sturgeon populations and specified other migratory fish populations.*

*⇒ Specification of number and locations of fish migration aids and other measures, including potential barriers for removal to achieve/improve river continuity that will be implemented by 2027 by each country.*

*⇒ Standardize and harmonize methodologies for assessment, prioritization, implementation of barrier / dam removal as well as for establishing passing solutions.*

Also please see comment under maps (map 13) at the end of the document.

- We recommend to supplement the existing river continuity measures with the following key specific measures (with blue colour) for habitat or population restoration in line with vision and objectives ( chapter 8.1.5.3.1 “River Morphological Alterations”):

- ⇒ *Restoration/mitigation of river morphological alterations and habitats to ensure improvement of aquatic ecosystems and water status.*
  - ⇒ *Specification of location and extent of measures for the improvement of river morphology that will be implemented by 2027 by each country*
  - ⇒ *Restoration of habitats of migratory fish species, in particular sturgeons*
  - ⇒ *Based on the results of MEASURES, complete the identification of habitats for migratory fish species and the assessment of their protection status to address the remaining gaps of a network of critical habitats and complete the map produced by the MEASURES project.*
  - ⇒ *Assess habitat functionality by monitoring the migratory fish populations and their habitat use*
  - ⇒ *Establish working relations with authorities responsible for nature protection and biodiversity in Contracting Parties, who will be closely associated in achieving this mission*
  - ⇒ *strengthen working relations with the EUSDR Priority Area 1a and national inland waterway authorities to perform studies on the impact of waves on fish and agree on measures with the aim of developing a comprehensive set of measures for impact mitigation for the whole Danube and its tributaries*
  - ⇒ *extend necessary working relations in the Black Sea region to address the marine part of the life cycle of (anadromous) migratory fish species*

- We recommend the following additional measures to include in chapter 8.1.5.4.1 Future Infrastructure Projects – Vision and management objectives:

*⇒Engage with authorities responsible for energy and climate with the objective of phasing out financial support schemes for hydropower*

## **Integration**

- We recommend to add to chapter 6, Integration Issues (pag. 90), after the first sentence as follows (in blue):

*The integration with other sector policies is an important issue in the Danube River Basin in order to create synergies and avoid potential conflicts. Activities are ongoing to continuously implement and further intensify the exchange with different sectors such as inland navigation, hydropower, agriculture, and nature protection including sturgeon conservation activities. The Local Migratory Fish Networks established in several Danube countries in the MEASURES project have proven to be good platforms for stakeholder discussion and debates on a specific target and can be used as a basis for future efforts.*

- To chapter 6.4., Inland Navigation and the Environment (page 96), add the following bullet point to the existing list
  - *Promote as much as possible non-structural measures and minimise the impacts of structural interventions through mitigation and/or restoration and giving preference to reversible interventions.*

It is also suggested to add a paragraph at the end of this chapter:

*Another emerging challenge that needs further investigations and agreement on measures is the impact of the growing passenger transport on water quality due to a lack of suitable waste collection and treatment facilities on land.*

- 6.5 Sustainable hydropower chapter:

We recommend to add or emphasize the following key messages (in blue) in order to meet WFD requirements and implement the approach of the “Guiding Principles on Sustainable Hydropower Development in the Danube Basin” in the paragraphs on page 98/99:

*“Undoubtedly, hydropower will remain an important pillar of the Danube region’s renewable electricity portfolio. However, in relative terms its contribution to overall production is expected to fall due to the expected massive expansion of wind power and solar photovoltaic system while the impact on riverine ecosystems will remain an outstanding water management issue as mitigation measures are being implemented at varying speed and effectiveness across the Danube basin. Generally, the strategic need for additional hydropower development should be defined in an overall power system planning process....”*

- 6.2. River Basin Management and the Marine Environment:

Add at the end:

*“Other issues include e.g. the migration of anadromous migratory fish species like sturgeons from the Black Sea to the upper reaches of the Danube. With respect to the latter, the ICPDR and the Contracting Parties will use the dialogue between ICPBS and ICPDR parties to analyse and agree on sturgeon conservation actions.”*

- 6.6 Agriculture chapter and chapter on Nutrient pollution (8.1.2.3.), as well as 8.5 Financing PoM to add (in blue):

The dialogue started between ICPDR and the agriculture sector is very welcome since this sector is among the key stakeholders in river basin management and floodplain/wetland restoration efforts. We therefore propose to highlight the role of this dialogue in overcoming obstacles to hydromorphological measures by adding the following measures to the provisions:

*In order to effectively engage and gain the support of the agricultural sector for change in land use or land use management necessary for floodplain/wetland restoration, the following incentives have to have be created:*

- *opening CAP 1st pillar direct payments for water retention on arable lands*
- *amending land use regulations to support water retention on agricultural lands.*
- *including in CAP 2nd pillar WFD compensation schemes for restrictions on land use such as water drainage, time of seeding, or irrigation due to conservation measures.*

## MAPS

Map 13, river continuity:

We would like to ask for justification for the data points in the map showing dams passable for fish. According to our knowledge or field observations, some of them are questionable. The existence of a fish pass doesn't automatically mean it is functioning and passable for fish. For example the 3 dams on the Drava near to the confluence with Mura have fish passes not designed for the fish species living in the Drava. Also based on field observation, the Dubrava dam doesn't ensure water in the fish passes throughout the year. In Romania, on the Olt, several dams are indicated on the map as not passable for fish, but GES/GEP achieved. We are wondering how this can be.

Map14, alteration of river morphology:

We suggest adding a measure to update and/or harmonise methodologies for defining morphological conditions on joint (transboundary) river stretches which flow along borders. The classification of morphological conditions is the same on the SK-HU Danube between Gönyű-Szob, on the RO-BG Danube stretch or on the SK-HU Ipoly. But they are different on the SK-HU Danube upstream Gönyű, or the HR-HU Drava. The difference between the categorization is quite significant on the HR-HU Drava (class4-5 in Croatian and class 1 in Hungary). This raises several questions about the methodology and it is hard to evaluate which category reflects the real water body status.

Maps 34, 35, 36, 37, 38, 39

These maps show the expected improvements of hydromorphological alterations. We don't find either in the main text of the plan, nor in the list of main measures how these predicted improvements will come about. We recommend making this an item of the upcoming work plan and data collection template of the HYMO TG for higher transparency, knowledge sharing and joint learning among the countries.

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30 September 2021

Public consultation, Draft Danube FRMP 2

Dear colleagues,

As long-term NGO observer, WWF Central and Eastern Europe appreciates the progress that has been made in Danube basin flood risk management planning over the past two decades.

We would also like to highlight our satisfaction with the numerous opportunities provided to WWF and other NGO representatives for engaging in ICPDR discussions and processes. The statement of WWF CEE on the draft Danube basin level flood risk management plan is attached to this letter.

Best regards,

Tamas Gruber  
freshwater programme manager  
WWF Hungary – WWF Central-Eastern European Programme



Küldetésünk egy olyan jövő megteremtése,  
amelyben az emberiség és a természet  
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## Draft Danube River basin Flood Risk Management Plan, Public Consultation 2021

### STATEMENT OF WWF CEE

As long-term NGO observer, WWF Central and Eastern Europe appreciates the progress that has been made in Danube basin flood risk management planning over the past two decades.

We would also like to highlight our satisfaction with the numerous opportunities provided to WWF and other NGO representatives for engaging in ICPDR discussions and processes and very much hope that such a transparent approach has been replicated at national level for this consultation round but also future river basin management processes.

The draft updated Danube basin level flood risk management plan (DFRMP2) is well developed and understandable also for professionals and laymen. WWF CEE has some remarks on the whole draft plan and on some specific chapters and maps.

#### Main highlights:

- I. WWF highly appreciates that green measures are included in the updated draft DFRMP2 main text and it is declared that natural water retention may have a significant role in flood risk management.  
However, some more details in the annexes (esp. annex 2 on measures) do not reflect this green approach or the level of their application is unclear.  
In some countries implementation of green measures for flood mitigation are lagging behind and interventions go against nature conservation objectives. From the Danube basin level FRMP's the annex 2 (overview of measures) lists green measures as well, but the ratio between the traditional, grey measures and green ones are not indicated, only a general list on national level. We understand that such a basin plan cannot include measures' breakdown per water bodies, but at least on national level could be indicated the above-mentioned ratio to have a better view on progress toward integrated and more sustainable solutions.  
Also, there is no convincing evidence among the examples, projects or data mentioned in the plan that underline the above mentioned green approach, although the statements of the text communicate that the green measures are considered or are priorities. We suggest that all information and examples are shared which show evidence that the green solutions are as important in flood risk management as the grey measures, or that the consideration of them is a priority, or at least key aspect during flood risk management planning on national level. There are examples and projects in the draft, including promising elements or already results, but data or maps are not shared where the reader can compare what the exact proportion of grey and

green measures is. Such data in summary tables or on maps would help to see the overall picture and judge the level of ambition on basin wide or on national level.

- II. WWF appreciates that Danube basin countries have agreed on some principles considered and implemented on national level with horizontal impact in the whole basin. What is still missing is the practical information about the concrete cross-border, multinational joint actions. Like in the Danube basin river basin management plan, prioritized basin-wide or key transboundary actions should be part of the DFRMP2.
- III. WWF welcomes the process of WFD and FD harmonization on the Danube basin level (The specific comment on the harmonization is in the text further down.) WWF would like to raise the attention to the integrated solutions promoted also under the DRBMP. Priority should be given to integrated solutions that solve several problems at the same time, not only flood management, but also drought mitigation, water quality improvement or biodiversity objectives with a longer term perspective.

#### Remarks to the chapters of updated FRMP

1. chapter 3.2 flood risk maps: Please include data in the chapter about the reference year of the maps. Are they also dated in October 2019, like APSFRs? Or these maps were developed in 2020?
2. chapter 3.3 – it is not clear to which annex the text refers to, regarding the following statement: “is provided in the updated summary report on implementation of article 6 and 14 (2) of the flood risk directive in the Danube Basin District”. This information would be necessary to understand the approaches followed by the different countries.
3. Chapter 5 - We can read that the *measures and their prioritisation consider those measures which have transboundary impact or basin wide importance and consider measures which are applicable in more countries*. We propose to provide information about the concrete measures and their affected countries, making clear which countries belong to the concrete transboundary measures.
4. Chapter 5 and 5.1 and annex 2 include 3 different types of approaches for prioritization. The 1<sup>st</sup> aspect is about „measures with transboundary impact / basin wide importance and measure applicable in more countries”, the 2<sup>nd</sup> aspect is the prioritisation of measures with upstream and downstream effects (nwrn, warning system, reduction of risk from contaminated sites), 3<sup>rd</sup> aspect includes the 5 selected basin wide objectives (avoidance of new risk, reduction of existing risks, strengthening resilience, raising awareness, promoting the solidarity principle). These are 3 different aspects and their weight in the prioritization is not clear. Basically these 3 aspects are relevant and we agree with them, just we recommend to make clear which measures contribute to which aspect.
5. chapter 5.4 – It is important that the flood risk management plan and the proposed measures are evaluated from the climate change aspect, focus on integrated solutions that solve several problems at the same time such as flood management, drought mitigation, or biodiversity

objectives. Climate change significantly influences the low water period and the drought phenomena and not only floods. It is recommended that the following principle is included in the flood risk management: flood risk management measures will not increase drought risk of habitats or community lands on active and hydromorphological floodplains (APSFRR).

6. chapter 5.5.2: see our recommendation above, under the number 1. overall highlight
7. chapter 5.5.6 – We suggest that the definition of basin-wide measures is included in this chapter. The table in annex 2 is only a list of measures by the countries. We suggest to include or highlight here those measures that require joint efforts of all or several countries in order to have impact) In the subchapters of 5.5.6. a list of priority measures of basin-wide importance is missing. Many of these projects are not about implementation of measures, but “only” preparation. Separation of these very different statuses help to evaluate real progress.
8. chapter 6.3 – The description is good and emphasizes properly that NWRMs have multiple benefits. We recommend to include one important topic: the widening of the active floodplain, relocation of dykes or regulated water outlets through dykes. More space to the rivers increases significantly the water retention capacity and it has a key prerequisite: the adaptation of land use to regular inundation. We suggest including these aspects in the text of chapter 6.3. In our opinion an important conclusion and data is missing from chapter 6.3: the geographical scale of the NWRMs measures implemented in the past and planned in the future in the Danube countries.
9. Chapter 6.4. The examples of this chapter provided by the Danube countries are not in line with the ideas and proposed approach in chapter 6.3. The examples are not convincing or even don't include NWRM. We conclude that NWRM is part of the countries' flood risk management approach in general. We suggest that the missing data about the scale of the implementation is added and the proportion of the implementation of green measures and grey measures.

Specific remarks that confirm the statements above:

\* The capacity and potential of the retention is missing in cases of CRO, SLO, RS, B&H countries. No concrete numbers or data is listed (or linked) in the document. Due to the high pressures on the water bodies, nature based solutions or NWRM have to become obligatory technical solutions, not only mentioned as preferred option if possible. Having this in mind, we also suggest deleting one part of the sentence (marked crosslined) on pg 78 (text on Croatia): "In the prioritization of the flood protection measures, the natural water retention and flood retention measures (i.e. Green Infrastructure measures) are emphasized over the structural flood protection measures ~~where their application is technically and economically feasible.~~"

\* Slovak FRMP (2015) did not implement NWRM in its full potential, only a few types of measures (from the catalogue of measures <http://nwrms.eu/measures-catalogue>) were selected and these are more likely only recommendations. Necessary additional steps for their successful implementation are missing in the Slovakian FRMP.

\* It is mentioned in the chapter that "the measures of water accumulation and water retention are tested in Slovakia". However, there are no results or information about these activities in the SK FRMP nor in the Preliminary flood risk assessment (2018)



10. chapter 7, 7.2 and 7.3 – (coordination with WFD) This chapter still includes only high level, general statements, however since the first cycle, more knowledge and data were collected and further preparations were done in the countries. The information about the implementation of win-win measures is missing from it. In chapter 7.3 about the progress, the total 15 130 hectares on basin wide level seems very low taking into account the available 6 years since 2015, especially that the implementation is not finished on all of them (planning is ongoing on 2650 ha) or were implemented only partially (7954 ha were partially reconnected). We would like to see more ambitious progress in the implementation of win-win measures.

Specific remarks that confirm the statements above:

\* it was mentioned in the chapter that "The national FRMP will be approved by the Slovak Ministry of the Environment (MoE) and will form a component of the RBMP". However, in the draft of SK RBMP, description of objectives and requirements of Flood directive is vague and only refers to the PoM of Flood directive with no clear interlink with RBMPs. The draft of SK RBMP provides little evidence that the objectives and requirements of the Floods Directive have been considered.

\* As part of the comment process of SK RBMP, we pointed out that there are still discrepancies between the measures listed within RBMP and FRMP.

We recommend to emphasize the following in chapters 7, 7.2 or 7.3:

NWRM with hybrid measures can be given the much needed implementation push by taking the following steps:

A) focus on integrated solutions that solve several problems at the same time, not only flood management, but also drought mitigation, water quality improvement or biodiversity objectives with a longer term perspective.

B) overcome the blockage by the agricultural sector by providing the right incentives. This entails in particular the opening of CAP Pillar 1 direct payments for water retention on arable land and amendment of land use regulations to support water retention on agricultural lands, as well as inclusion of WFD compensation schemes in the CAP Pillar 2 for restrictions of certain land use such as water drainage, time of seeding, or irrigation due to conservation measures.

C) Building capacity in authorities for planning and implementing restoration and conservation measures together with key sector representatives, such as agriculture, flood mitigation, nature conservation, forestry.

D) Preparing a pipeline of projects including feasibility studies, stakeholder engagement, and agreements with land-owners, technical design and permits and funding allocation.

E) Allocating financial resources e.g. from the National Recovery and Resilience budgets, the Operational Programmes and Common Agricultural Policy funding lines to the Programmes of Measures.

11. Chapter 8 about CBA - Many methodologies are available on cost-benefit analysis, but we miss information in the country sub-chapters whether the CBA is a real decision making support tool during the selection of measures and during the FRMP implementation process. The experience is that there is a lack of knowledge on this field among the experts and at the institutions responsible for FD and WFD. We recommend to add trainings and knowledge sharing in the proposed activities in Danube countries during the coordinated and harmonised WFD - FD implementation.
12. Chapter 10 international coordination: It is suggested to show in this chapter the way flood risk is managed on cross-border water bodies, including how the national FRMPs are harmonized on those stretches. This is especially relevant on long river stretches of the Danube (Slovakia-Hungary, Bulgaria-Romania) where the river flows on the country borders. Without concrete information on that, it is rather difficult for the stakeholders to get a full picture about the international coordination.
13. 12.1.2 ICPDR Observer Organisations: The name of our organisation changed from WWF DCP to WWF CEE (WWF Central and Eastern Europe).

#### Inputs from the Danube Floodplain project

WWF is aware that there is an intention to include the conclusions and recommendations of the Danube Floodplain project into the flood risk management plans on basin wide level, as well as country level.

Some of the most important conclusions from the outputs, manual and road map of the project which we would like to emphasize:

- a) Reducing the connectivity between channel and floodplain is the major threat of floodplain ecosystems in the Danube Basin. The approaches to achieve lateral connectivity in pilot areas are different. The most common measure is the relocation of dykes, others are the creation of connection channels or the modification of channel planform.
- b) The results of meso-scale biodiversity assessment in the pilot areas show that floodplain habitats, and thus biodiversity, can benefit from increasing the lateral connectivity, as intended by the majority of restoration scenarios. While the assessment on the meso-scale shows the general tendency for the development of habitats, a microscale analysis gives insights on the level of species or specific communities. However, this requires in-depth knowledge of the setting and cannot be obtained without extensive fieldwork
- c) Integration of the environmental objectives and flood risk management objectives requires moving away from the classical flood protection solutions to nature-based ones.
- d) To affect the peak discharge, we consider it crucial not only to consider a single restoration measure but a combination of multiple measures, on the river channel, the floodplain extent, and the character of the floodplain (natural conditions).
- e) Nature based solutions refers to actions in which reducing the flood risk is provided, while at the same time natural properties of the floodplains are restored and preserved
- f) Because of the multiple benefits provided by natural floodplains, EU policies encourage floodplain restoration based on integrative plans and win-win solutions. Synergies between

Flood Risk Management Plans (FRMP) and River Basin Management Plans (RBMP) should be mainly reflected by sustainable measures either addressed for the prevention and mitigation of floods, but in the same time for reaching the environmental objectives of the water resources.

- g) Agreement on the wide range of benefits provided by floodplain and river restoration could be ensured by using an approach rooted in ecosystem-based management when developing river basin and flood risk management plans.
- h) Considering the specific criteria, 24 potential floodplains (see table below) were also identified. Potential floodplains represent in fact one of the key interest points considering the improving the lateral connectivity on Danube River. Ranking (need for preservation + restoration demand) has been performed for all active Danube floodplains

*Table 1 Delineated potential floodplains along the Danube and gauges, where the 1D model results are handed over to the next downstream partner*

Nr	Code	Location	Country	Area (ha)
1	DE_DU_PFP01	Oberelchingen - Lech	DE	16697.755
2	DE_DU_PFP02	Lech - Neuburg	DE	3735.836
3	DE_DU_PFP03	Großmehring	DE	493.489
4	DE_DU_PFP04	Katzau	DE	308.573
5	DE_DU_PFP05	Geisling/Gmünd	DE	2502.078
6	AT_DU_PFP01	Krems - Wien	AT	16065.502
7	AT_DU_PFP02	Wien - Devin	AT	12139.098
8	HU_DU_PFP01	Szigetköz	HU, SK	15711.284
9	HU_DU_PFP02	Paks	HU	2214.239
10	HU_DU_PFP03	Veránka-sziget	HU	16171.593
11	HU_DU_PFP04	Béda-Karapnacs	HU, HR	5470.582
12	RS_DU_PFP01	Siga - Kazuk	RS	6057.497

13	RS_DU_PFP02	Vajska	RS	5986.201
14	RS_DU_PFP03	Kamarište	RS	10069.097
15	BG_RO_DU_PFP01	RO: Desa area	BG: Slivata - Orsoia area	8276.79
16	BG_RO_DU_PFP02	RO: Bistret - Bechet area	BG: Dolni Tibar - Oreahovo area	27972.78
17	BG_RO_DU_PFP03	RO: Bechet - Turnu Magurele area	BG: Oreahovo - Cerkovita area	30972.02
18	BG_RO_DU_PFP04	RO: Traian - Zimnicea area	BG: Deagas Voivoda - Svistov area	20450.04
19	BG_RO_DU_PFP05	RO: Nasturelu area	BG: Novgrad area	3169.1
20	RO_DU_PFP01	Borcea Buliga	RO	857.922
21	RO_DU_PFP02	Bentu	RO	68.551
22	RO_DU_PFP03	Garliciu	RO	1083.819
23	RO_DU_PFP04	Tichilesti	RO	31808.282
24	RO_DU_PFP05	Cotu Pisicii	RO	1163.455

For the HU Tisza section: (name/potential floodplains and km2) :

Total of 316,6 km2: Milota 20,9km2, Tizadob 39,4km2, Tiszadorogma 31,1km2, Pély 36,2km2, Nagykörű-Szajol 40km2, Szolnok Tiszaug 91,4km2, Lakitelek-Csongrád 57,6km2

#### Comments on the maps

- Map 1 – We acknowledge that the methodology of flood hazard areas depends on country decisions, but map 1 is not so informative with this approach. With respect to Croatia's Danube basin sites on Map 1, it seems to show that about 90% of the country is affected somehow by medium probability floods. These are under flood risk within 100 square kilometres or under

flood risk of rivers shorter than 50 km. The map 1 in this format can be interpreted that the river / stream network of Croatia is so dense, that there is almost no square kilometre which is not affected by waters. This does not seem to be logical if we consider the topography and the land use of these territories.

- MAP 5a – the sites where the PAs and the low probability flood areas are overlapping should have different colour than red or purple. The map now doesn't show the overlap of these two categories. We see the low probability flooded areas with red and the protected areas with purple, but the overlapping areas don't have a different colour.
- Map 5b – We suggest that in the upcoming updated version not only the total number of protected areas are on this map, but data of the size of these areas is also available. The total size is more informative than the total number of PAs.

30<sup>th</sup> September 2021

Tamas Gruber, WWF Hungary/WWF CEE

Laurice Ereifej, WWF CEE

Irene Lucius, WWF CEE

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Cu stimă, Vivia Sandulescu

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Best Regards

Cu stimă, Victor Sima



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Teodor Gheorghiu, Arad, Romania  
Cu stimă, Teodor Gheorghiu

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Udrea Stefan-Sebastian

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Respectfully your,

Cu stimă, sorin paulian tiron

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Cu stimă, Simonq Truțiu

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Cu stimă, Silvia Radu

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Thank you in advance! Sergiu Oprea

Bucharest, Romania

The efforts of Apele Romane to destroy precisely the "Apele Române" (Romanian Waters / Romanian Rivers) are simply insane. But quite relentless. They made their business as a thorough enemy of healthy rivers and aquatic life.

Therefore, the only way to keep the situation under a modicum of control is to include a very precise set of mandatory measures in the Danube Basin Management Plan.

Nature - and eventually people - needs a binding instrument that will mitigate the active destruction of the - barely alive - rivers that feed the Danube (especially the Jiu Basin)

Thank you very much,

Serban Alexandrescu

Cu stimă,

serban alexandrescu



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Thank you very much!

Dan Vasile / ROMANIA

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Cu stimă,  
Robert Negut

Dear Sir / Madame,

My name is Razvan Pauta and I live in Romania, Bihor County, Mehedinti street no. 33. I am very concerned about the status of the rivers in our country and for that I would like to submit to your attention that ICPDR states that "communicating with the public is the public communicating with us", so please consider the following.

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Cu stimă,  
Paula Bulea



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Cu stimă,  
paul iacobas

Dear Sir/Madam,

My name is Nicoleta Sava and I would like to send you the following observations.

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Thank you for yours attention! Mihaela Gondor

Cu stimă, Mihaela Gondor

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DARNEA MIHAELA-Expert

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Best Regards, Lungu Emil Marius

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Marinela PASCARU

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Cu stimă,  
maria-ana astalas

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With consideration,  
Magdalena Mande

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Kind regards,  
Lucian Gavril

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Thank you for hearing us out.

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Lorena Olaru



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Liana Damian

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Cu stimă,

Laura Tosa

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Laricea Roman

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Klara Morariu

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K.Vlaic

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IONEL DRAGOS STEFAN

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ILIE BALUT

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Cu stimă,

Horia Mocanu



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Florin Marc

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Flaviu Tufis



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Cu stimă,

Filip Alexandrescu

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Eugen Pluti

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Cu stimă,

Eliza Fati

I am born în Bechet, Romania, on the Danube. As a young girl I used to go on the beach în The summer, 50 years ago. Then the water was clear and clean, what I'm hardly missing now.

The rivers here are now devastated, and the cause of this devastation can be found in the European Parliament resolution of 17 December 2020 on the implementation of the EU water legislation, at letter R: the conflict of interests.

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Thank you în advance for your understanding!

Elena Kraemer-Stamin

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Throughout our history, of mankind, we have built our settlements and life around water. That hasn't changed yet. Where there is water is life, where life disappears, disappears. There can be no argument for destroying a stream, none. Delia Breaz

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Cu stimă,

Darius Rotaru

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Daniel Popa - Constanta, ROMANIA

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Dana Patriche

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Regards, Dan Zanfir.

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Cu stimă,

Carmen Tica

Dear members of ICPDR,

Please, consider the following observations for the improvement of the management plan for the Danube River Basin.

In order to have a management plan that protects the region, the commission needs to consider the conflict of interests that might exist for some of the national agencies responsible for the application of this plan. This is the case for the Romanian Waters National Administration. This agency is financed from activities that deteriorate the chemical and ecological status of bodies of water, so it is clearly in a conflict of interests as mentioned also in the European Parliament resolution from 17 December 2020 on the implementation of the EU water legislation, at letter R.

To overcome this problem, we propose to

1. Include strict measures for the protection of rivers in the Danube River Basin, prohibiting any works or activities that would affect the natural status of a river. Tens of water bodies have been destroyed in Romania by river regulation works performed by Romanian Waters Administration in the last years in spite of the two previous DRBMPs. In the current conditions, the alterations are about to increase, due to the financing of grey infrastructure measures from EU funds (LIOP, SO 5.1). The most outrageous is the river regulation project meant to alter the course of the Western Jiu River (such wrong examples should also be mentioned in the DRBMP).

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Exceptions can be included, provided they have a very low, localized impact and are performed to save human lives. Massive morphological alterations must be clearly forbidden.

2. Consider data from reliable sources. The Danube River Basin management plan is based on some false data from the above mentioned institution and from its satellite companies. As long as these conflicts of interest which govern Romanian Waters National Administration persist, the non-deterioration principle is not applied. Most of the morphological alterations of different categories counted for Romania in this plan are underestimated. For example, the number of significant water abstractions reported for Romania (in figure 26) is very far from the truth. In Romania, there are several hundreds of significant water abstractions caused by the hydropower industry. For instance, as you can find on page 155 in the book ”Water Resources Management, Methods, Applications and Challenges”, 81 watercourses are diverted for only one hydropower plant. We understand that ICPDR has no means to perform a real count, and it only collects data from the water administrations of each country, which have no interest to describe the real picture. Alternative, independent organizations, must be considered as data sources as well. For instance, for significant water abstractions in the Balkan part of the DRB, you can contact Riverwatch.

Moreover, good examples of rivers well preserved in their native state should be included as standards in DRBMP. For example, the undisturbed Râu Alb River (valuable for reference conditions), saved from a hydropower project and from an industrial fish farm project, should also be mentioned in the DRBMP.

Sincerely,

Carmen Tanase, Romania

ICPDR states that "communicating with the public is the public communicating with us", so please consider the following.

In figure 2 is depicted the grim situation of the rivers in the Danube River Basin. Despite the grim picture, the situation is getting worse, instead of improving. A quite large share of the DRB is in Romania. The rivers here are devastated, and the cause of this devastation can be found in the European Parliament resolution of 17 December 2020 on the implementation of the EU water legislation, at letter R: the conflict of interests.

As long as these conflicts of interest which govern Romanian Waters National Administration persists, the non-deterioration principle is useless. Fake studies of impact assessment on the water bodies are always available in Romania, from the satellite companies of "Romanian Waters". So the DRBMP needs to include strict measures, at least basic, common-sense restrictions, instead of descriptions and statistics. Strict measures cannot be bypassed. Otherwise, the plan is just a kind of fairy tale. The two previous DRBMPs failed to address the appetite for destruction of "Romanian Waters", and we cannot afford a third failure. Tens of water bodies were destroyed in Romania, by new river regulation works, in the last years. And the alterations are about to increase, due to the financing of grey infrastructure measures from EU funds (LIOP, SO 5.1). The most outrageous is the river regulation project meant to alter the course of the Western Jiu River (such wrong examples should also be mentioned in the DRBMP).

The draft plan states that: "Hydromorphological alterations in the DRBD are mainly caused by flood protection measures". So new morphological alterations must be reduced to the minimum.

The negative impact of the river regulation works is mentioned throughout the document. As written on page 94 of DRBMP, the EU Biodiversity strategy imposes restoration of 25.000 km of rivers. Before restoring, we must stop altering new river stretches by new river regulation projects, otherwise, the whole effort is non-sense.

On page 55 in the draft plan is stated:

"Considering described changes, it is even more important to prevent rivers from further deterioration due to new man-made physical modifications."

It follows from the above that clear prohibitive measures against new morphological alteration in DRB must be included in the DRBMP.

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Fortunate cases, like the one of the undisturbed Râul Alb River (valuable for reference conditions), hardly saved from a hydropower project and, so far, from an industrial fish farm project, should also be mentioned in the DRBMP.

Cu stimă,

Carmen Radu



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Carmen Babiceanu

Bucharest/Romania

Cu stimă, Carmen Babiceanu

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Cu stimă, Calin Dejeu

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Yours sincerely Balc Nicolae



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aurelian Miron

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AURELIA MIHALACHE

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Cu stimă,  
Aurel Mironescu

Dear Madam/Sir

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Best regards, Lukács Árpád

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Cu stimă, ANTONELA LAZIN

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Cu stimă,  
Angela Muraru

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Andrei Tescan

Dear Sir / Madame,

My name is Revesz Andrea (str. Lapusului nr. 44, bl. An 221, ap. 16, Oradea, jud. Bihor, Romania) and I am writing to ICPDR, that states that "communicating with the public is the public communicating with us", so please consider the following.

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With respect and hope that you will take the above-mentioned arguments into consideration,  
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Cu stimă,  
Ana-Isabelle Iliovici

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Cu stimă,  
Ana Maria Neagu

Hi,

My name is Ana Adam-Teodorescu and I am from Bucharest - Romania.

I kindly ask you to take some minutes read to this important email because ICPDR states that "communicating with the public is the public communicating with us", so please consider the following:

In figure 2 is depicted the grim situation of the rivers in the Danube River Basin. Despite the grim picture, the situation is getting worse, instead of improving. A quite large share of the DRB is in Romania. The rivers here are devastated, and the cause of this devastation can be found in the European Parliament resolution of 17 December 2020 on the implementation of the EU water legislation, at letter R: the conflict of interests.

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So the DRBMP needs to include strict measures, at least basic, common-sense restrictions, instead of descriptions and statistics. Strict measures cannot be bypassed.

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I am looking forward to your answer.

Thank you,  
Ana Adam-Teodorescu

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Thank you,

Adrian Nicoara – Romania

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30 SEPTEMBRIE 2021 Cu respect, Nechita Grigore

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Alin, Cu stimă, Alin-Ioan Sacota

Dear Madams and Sirs,

My name is Florian Alexandru Sarivan, a Romanian citizen, living in Bucharest, near of the Dambovita river shores and a beautiful chain of lakes . Our, me and my family, faith is to keep these waters clean, without any pollution, for good health of the peoples.

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Cu stimă,  
Ana Tocana

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