

Danube River Basin Management Plan

Comments of the Czech Republic

In general there are no serious comments to the DRBMP, material is well balanced and all our comments are mostly some addendum, questions or complementary remarks.

List of Acronyms: IPPC is in fact Integrated Pollution Prevention Control (without Directive)

Table 1, Key tributaries: instead of Stratka, should be: Svatka

Chapter 2.1.1.1, para. 2: Agglomeration 2-10 000 (21 mil PE)...Agl.>10 000 (73.6)=> Σ =94.6 mil. PE and on p.9, Fig.3 last col. (for the same sum different number) Σ = 95.1 mil. PE

Ch. 2.1.4.3, Water abstractions: Hydropower 74%, agriculture 8%, urban use 7% compare with p.50, sentence 2: Agriculture 40%, industry 40%, urban use 20% (it should be explained, that it e.g. comprises also groundwater uptakes)

Ch. 4.1.4.1.1, sentence 5: For.....designation (N.B. HR, RS....). It is not clear what the acronym N.B. stands for? It should be in the List of Acronyms or better to change the wording.

Footnote 72: Please delete the CZ. There is no reason for it. The CZ should implement the UWWT Directive till the end of 2010.

Chapter 7.1.1.3.1, Implementation of the IPPC Directive: BREF should be given into the List of Acronyms

Chapter 7.1.2.1, please redraft the 2nd point: Reduction of discharged nutrient loads into the Black Sea to such levels....(Rem. the ICPDR cannot be responsible for discharges from the whole Black Sea Basin.)

Chapter 7.1.2.3, Basic considerations on the introduction of phosphate-free detergents, sentence 3: As for the CZ “completely” should be deleted. In the CZ phosphates are not completely replaced. From technological reasons small amount (0.5%) of P in washing powders remains. Moreover content of P in dishwashers is not restricted.

Table 13: Please check the data in this Table, which do not correspond with the Figure 30 and with the statement in the second and third bullet on the previous page. In the 2nd and 3rd line the units are missing.

Figure 30: Please check the data in this Figure and compare them with real data in the Table 13.

Fig. 31, Ban scenario: Reduction of P emissions in the CZ seems to be rather high, when having phosphate-free detergents introduced yet (?)

Figure 31: We considered the strange increase in P emissions in the case of the CZ. We arrived at the explanation that in 2005 the CZ had already all bigger cities equipped by the sewerage and quality UWWTPs (nutrient removal). The Figure does not count with pollution

from the part of agglomerations (in CZ predominantly small agglomerations), which are not connected to collection systems. These pollution sources are considered to be diffuse pollution sources. After the full UWWT Directive implementation in the CZ the pollution (including P from the new built small UWWTPs) will create paradox positive P balance in the comparison with the situation in 2005 when the P load from these not equipped agglomerations was not considered as a point source.

It would be useful in the Figure 31 to consider also the diffuse pollution from the uncollected waste water from agglomerations or to accompany the Figure 31 with the relevant explanation. Otherwise the results shown in the Figure are confusing. This is evident in the case of the CZ, where the total load after the UWWTP Directive implementation will be significantly lower, but the Figure shows increase.

Chapter 7.1.3.2, Implementation of measures regarding the industrial sector and the Box: REACH and GMS should be given into the List of Acronyms.

Chapter 9: Public information spread in place and through media during JDS 2 is also very valuable and should be mentioned in a short way.

Annexes

Annex 1: Please substitute the www.ochranavod.cz by the www.mzp.cz.

Annex 3, Chapter 6.3, Figure 11: The municipality of Olomouc is missing.

Annex 13: Comments to this Annex will be solved in the frame of the data upload.

Annex 14: Please check the data in this Annex and harmonise the order and position of decimal points.