

Comments to the River Danube Basin Management Plan

pursuant to Article 13 of Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000,
establishing a framework for Community action in the field of water policy

In compliance with Article 14 of Directive 2000/60/ES (hereinafter “WFD”) on public information and consultation at elaboration, reviewing, and updating the river basin plans, we became acquainted with the text of the draft of the River Danube Basin Management Plan, and we exercise the below specified remarks to it.

In light of maintaining and developing of inland navigation, we consider it suitable that the Plan refers also to the relevant international documents and EU documents, in particular as follows:

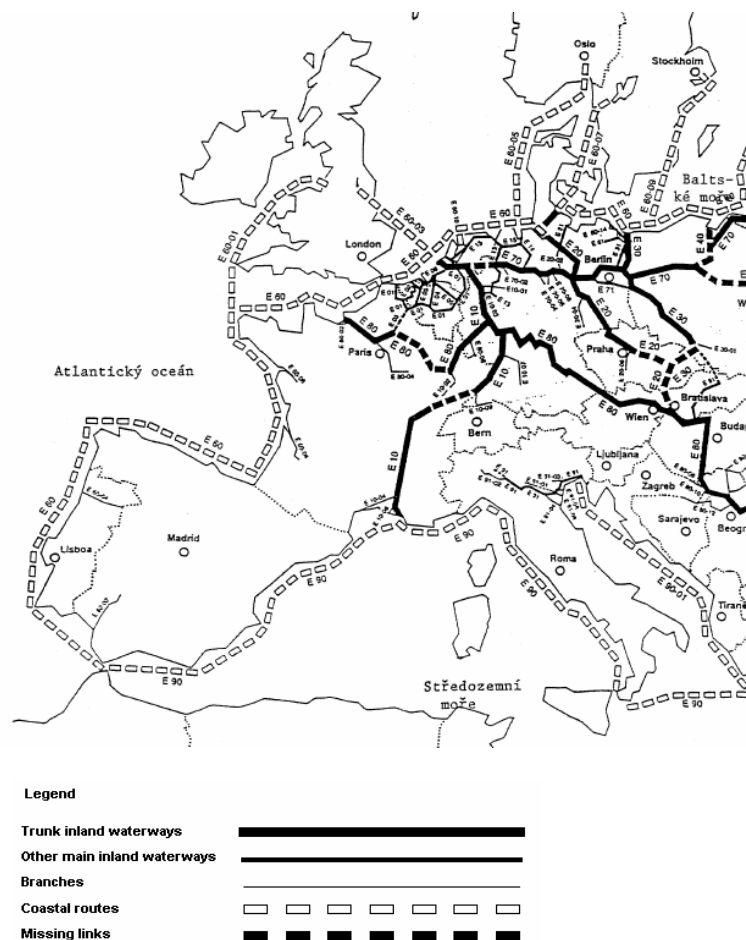
- a) European agreement on main inland waterways of international importance (AGN) – Geneva, 19 January 1996 (163/1999 Coll.) + amendments in force as of 31 October 2007;
- b) Decision No. 1692/96/ES of the European Parliament and of the Council of 23 July 1996 on Community guidelines for the development of the trans-European transport network as amended by Decision No. 884/2004/EC of the European Parliament and of the Council of 29 April 2004;
- c) Communication from the Commission on the promotion of inland waterway transport “NAIADES” – An Integrated European action programme for inland waterway transport {SEC(2006) 34};
- d) White paper: European transport policy for 2010: the time to decide (EC, 2001)
- g) Communication from the Commission: Action Plan for Freight Transport Logistics, COM (2007) 607
- h) Communication from the Commission: The EU’s freight transport agenda: Boosting the efficiency, integration, and sustainability of freight transport in Europe – COM (2007) 606

We demand that the above mentioned valid documents are taken into account in the River basin management plan.

Technical parameters of waterways E should correspond to classification of European inland waterways in accordance with the defined parameters according to TEN-T and AGN. On modernizing waterways of class IV, it is recommended to observe the parameters of class Va at least. New waterways E should correspond to parameters of class Vb at least.

Operational parameters of waterways E should provide reliability of international transport. At the same time, reasonable limitation is admitted of permissible values of draughts on waterways with varying water levels.

E waterways:



At the same time, we demand to enforce information according to "Blue Book" UN ECE, INVENTORY OF MAIN STANDARDS AND OF THE E WATERWAY NETWORK, issued by the ECONOMIC COMMISSION FOR EUROPE, INLAND TRANSPORT COMMITTEE (revised wording of 2006, ECE/TRANS/SC.3/144/Rev.1), where the most important missing links and "bottlenecks" in trans-European E waterway network are listed (in accordance with AGN class IV and higher), and this document and resolution UN ECE 49 call upon the member states and the Commission to remove these restrictions of the inland navigation.

The bottlenecks are sections of waterways of European importance with lower parameter values than it is desirable. The bottlenecks are divided into the basic and the strategic. The basic bottlenecks are those sections, where the parameters are not in conformity with the requirements to waterways E (class IV). The strategic bottlenecks are sections satisfying the basic requirements of class IV but which, nevertheless, ought to be modernized in order to improve economy of waterway transport. Missing links are parts of the future network of inland waterways of international importance which do not exist at present.

In relation to the Plan for the Czech Republic, it is specified in the listing of the most significant missing links and bottlenecks in the trans-European E waterway network as follows:

Czech Republic

Missing links: Danube - Oder - Elbe Connection (E 20 and E 30).

Development of the transport network in the European Union comes from the concept of **trans-European transport networks TEN-T** in road, railway, inland water and marine transport, which form the backbone system of the European transport.

"NAIADES" (Navigation and Inland Waterway Action and Development in Europe) action programme is also important in light of development of waterways. It focuses on five mutually interconnected strategic areas for comprehensive inland waterway transport: market, fleet, jobs and skills, image, infrastructure. It contains recommendations of steps to be taken by the European Community, Member States, and other concerned parties in period of 2006 – 2013. They may be included into legislative, coordinating and supporting measures. The programme implementation will proceed in close cooperation with national and regional authorities, River Commissions, and European industry.

PINE - Prospects of Inland navigation within the enlarged Europe - Full Final Report, March 2004. Within the frame of European waterway network, four following corridors are identified:

The Rhine corridor, the Danube corridor (South-East corridor), the North-South corridor, and the East-West corridor.

White paper (European transport policy for 2010 – time to decide) is a strategic document of the Community even for the field of support of inland freight water transport, especially where it points at externalities or at polluting exhaust emissions and their environmental impact, and also in the field of mutual interconnection of various modes of transport, where it highlights inland freight water transport as a key component of multimodality, which represents considerable potential in the field of reduction of congestion.

Lisbon strategy (The renewed Lisbon Strategy for growth and jobs and the reviewed Sustainable Development Strategy) – another strategic document of EU, which accentuates inland freight water transport, is Lisbon strategy, or its priority in connection with provision of sustainable transport, in order that the focal point shifts in future from road transport to railway transport and inland waterway transport.

Communication from the Commission: Action Plan for Freight Transport Logistics (of October 2007) requires that the freight transport becomes more sustainable. Therefore, in view of this action plan, it is necessary to strive for minimization of energy consumption and noise emissions, pollutants and greenhouse gases as a result of freight transport. In this connection the action plan introduces for logistic a term "green transport corridors", i.e. corridors for freight transport, which are characterized by small impacts upon human environment and natural environment. Railways and waterway transports become the basic elements of such green transport corridors. Therefore, the Commission recommends implementing the Commission action programme NAIADES for inland waterway transport (see above).

Communication from the Commission: The EU's freight transport agenda: Boosting the efficiency, integration, and sustainability of freight transport in Europe (also of October 2007) states that the review of the White paper of the European Commission of 2001 in the middle of the period anticipates 50% growth of freight transport for EU-25 (in ton-kilometers) in 2000–2020. In that context the Communication from the Commission states that quality of services in the freight transport must improve, especially if modal alternatives to the road transport are to be made more attractive. Railways in particular should struggle for increasing its efficiency and, at the same time, better integration of waterway transport into transport logistics chain should happen.

We demand that these facts are taken into account.

Comments on a draft version of Danube River Basin District Management Plan from 18th May 2009:
additional remark on Annex 7

Part A – Basin-wide overview

p. 25 - 2.1.4.4. Future infrastructure projects (FIP):

In addition to already existing hydromorphological alterations, a considerable number of future infrastructure projects are at different stages of planning and preparation throughout the entire DRBD (see Annex 7).

These projects, if implemented without consideration to hydromorphological alterations, are likely to provoke pressures on water status. Future infrastructure projects (until 2015) have been collected, based on specific selection criteria:

Danube River: Future infrastructure projects have been collected and listed for which Strategic Environmental Assessment (SEA) and/or Environmental Impact Assessments (EIA) are performed OR transboundary effects are provoked.

Danube tributaries: Future infrastructure projects have been collected and listed for which a Strategic Environmental Assessment (SEA) and/or Environmental Impact Assessments (EIA) are performed AND transboundary effects are provoked.

All FIPs (until 2015) including brief descriptions if provided are compiled in Annex 7 and illustrated in Map 8.

All FIPs (until 2015) including brief descriptions if provided are compiled in Annex 7. The pressure analysis concludes that 115 FIPs have been reported for the DRBD. 19 of them are located in the Danube River itself. 57 (49%) are related to navigation; 50 (43%) to flood protection, etc...

Therefore, it can be concluded that navigation and flood protection, followed by water supply and hydropower, are the key drivers that may provoke impacts on water bodies in the DRBD by 2015. 33 of the 115 FIPs are currently being implemented, 31 are officially planned and for 51 projects the planning is under preparation.

Comment:

In the Annex 7 there are no future infrastructure projects, no measures mentioned for Czech Republic, although there are some future plans on the Czech national level that should be involved in future planning.

We agree with the outputs of Hydromorphological Alterations Working Session –that came out from the second meeting of stakeholders held in Bratislava at 29th – 30th June. This group came out with thought that the list of FIPs (Annex 7) is not complete and should be revised. Danube countries should be urged to revise and complete the list by 14 September 2009. And in future (2nd RBM cycle) revision of criteria for FIPs of basin-wide importance should be considered. ICPDR together with EC should ensure transparency regarding FIPs and their implementation. Ensure (include) that all FIPs are climate proof.

We would like to add this point to the table in the Annex 7:

COUNTRY: CZ

NAME RIVER: Morava

NAME project: Morava IWT

MAIN PURPOSE: Navigation

DESCRIPTION: Improvement of IWT conditions on the river Morava and its connection to the river Danube.

PROJECT STATUS: Under preparation, partially implemented

TRANS-BOUNDARY IMPACT: yes

SEA: intended

EIA: intended

EXEMPTION 4(7): yes