



STATEMENT

By Centre for Environmental Information and Education

Concerning: DRAFT OF THE DANUBE RIVER BASIN MANAGEMENT PLAN

Basing our arguments on the European legislation in the field of water management, Centre for Environmental Education and Information (CEIE) would like to make the following comments and recommendations on the Danube River Basin Management Plan:

Referring to the Water Framework Directive (WFD) and particularly to Article 4 p.6, stating that: "6. Temporary deterioration in the status of bodies of water shall not be in breach of the requirements of this Directive if this is the result of circumstances of natural cause or force majeure which are exceptional or could not reasonably have been foreseen, in particular extreme floods and prolonged droughts, or the result of circumstances due to accidents which could not reasonably have been foreseen, when all of the following conditions have been met:

(a) all practicable steps are taken to prevent further deterioration in status and in order not to compromise the achievement of the objectives of this Directive in other bodies of water not affected by those circumstances;

(b) the conditions under which circumstances that are exceptional or that could not reasonably have been foreseen may be declared, including the adoption of the appropriate indicators, are stated in the river basin management plan;

(c) the measures to be taken under such exceptional circumstances are included in the programme of measures and will not compromise the recovery of the quality of the body of water once the circumstances are over;

(d) the effects of the circumstances that are exceptional or that could not reasonably have been foreseen are reviewed annually and, subject to the reasons set out in paragraph 4(a), all practicable measures are taken with the aim of restoring the body of water to its status prior to the effects of those circumstances as soon as reasonably practicable, and..."

we propose:

1. In compliance with subsection (b) from the above quoted article, the certain conditions according to which the water bodies (WB) will not accomplish the goals stated in the management plan should be declared and the departures from the norms should be described in details for the related WBs;
2. The measures which should be taken in the case of article 4, p.6, (c) from the WFD should be included and described in details in the Programme of Measures (PoM);

Other comments and recommendations:

- ❖ CEIE insists on the inclusion of the Danube River section, belonging to the Bulgarian territory in the water balance under the National River Basin Management Plan. The Danube river is of great significance for the country as a source of drinking water, water for agricultural and industrial needs. The Bulgarian Danubian coast is 470 metres long, possesses rich biodiversity and serves as a crucial natural resource for the local population. Therefore, we consider it of great importance that certain measures are developed for the river management and those measures are included in the PoM in the National River Basin Management Plan. The majority of the Bulgarian population living on the Danube coast counts on the Danubian natural resources for making and maintaining a living. Not developing a clear strategy for the future management of the Bulgarian Danube river section in the national legislation leaves the local population without a clear vision for their current and future possibilities to manage and cultivate their land. As well as these, without a management strategy the future of the unique biodiversity living in the Danubian delta remains unclear.
- ❖ The WATECO manual defines hydropower plants (HPP) as water users liable to inclusion in the economic assessment of the basin (according to the components of installed power capacity and energy production). The needed information about HPPs, which should be present when it comes to expenses returns is described in table 1 of the same document.

Hydropower plants often use pipe-pressure methods for water intake and infringe the water quantity in certain districts (approximately 1.5 km), which significantly contributes to the deterioration of the WBs' quality, biodiversity and ecosystems. Thus, according to the requirements of the WFD, the negative impact from such water intakes should be taken into account when aiming good ecological status.

CEIE insists on inclusion of the HPPs (including the small HPPs) in the economic analysis of water usage in Part 6 in order to comply with the principle of expenses return from the water services, including the ecological and raw material expenses, according to Article 9 from the WFD and the assessment of alternatives.

Water interconnectedness and constant movement in nature make WBs with good ecological status, connected to heavily modified water bodies (HMWB), prone to risk of deterioration. The fact that the environmental protection measures for the HMWB are less stringent contributes even more to the risk. In order to improve the characteristics of the WBs with bad status, CEIE appeals that the environmental protection measures shall not be less stringent because of the possibility that the WBs with bad status have a negative impact on the ecological and chemical status of the related WBs in a good condition.

- ❖ The Bulgarian national legislation recognizes the lack of information concerning the anthropogenic pressure on the water and littoral resources. Missing data is a significant problem for many of the countries in the Danube River basin. This is a serious issue when it comes to quantitative and qualitative analysis and assessment of the WBs' condition. Substantial data about the diffusive and point sources of pollution are missing, as well as results from ground waters monitoring.

Therefore, CEIE recommends that certain measures should be undertaken for the collection of missing data and these measures be included in the PoM. Data collection can be accomplished with the assistance of civil groups, organizations or various stakeholders and then be a part of the monitoring process.

- ❖ CEIE recommends that special attention is paid on the infrastructural transport projects planned at the Danube riverbed. Those projects are likely to have negative impact on the Danube River biodiversity and could respectively contribute to the deterioration of the characteristics of the WBs. Our organization is convinced that Strategic Environmental Assessment (SEA) should be implemented, at least at regional level, in order to prevent negative impacts and non-compliance of the WFD goals.
- ❖ There is no information in “Part 3. Protected Areas in the DRBD” about the status of bathing areas. Thus, we suggest that they are particularly pointed as protected areas after their establishment and after the necessary data has been collected.
- ❖ We propose that special attention is paid on artificial wetlands (reed beds) as means for pollution diffusion specifically for household waste purification. This measure could have a significantly positive effect when developing purification programmes for certain river valleys in order to limitate diffusive pollution sources. In addition to these, this measure will contribute to biodiversity conservation and preservation of the landscape’s esthetic look on a much lower price.
- ❖ There is no information about water transfers in DRBM Plan. Therefore, we suggest that this topic should be brouched because of its significant impact on the WBs and on the whole river basin balance as well.
- ❖ CEIE considers it of great importance that the compatibility of the National River Basin Management Plans and the existing river basin management programmes, as well as the changes in the legislation after the acceptance of the management plans are specially defined and officially stated in the countries from the region.
- ❖ We also recommend that there is a common template table for the PoM valid for all Danube countries because the comprehensiveness and detailization of the PoM tables considerably vary from country to country and depends mostly on the political will of the governments.
- ❖ Along with this, CEIE suggests that the restrictive measures and related sanctions from non-implementation of the management plans are stated in the national plans. This way they will become easily accessible to the general public and to the future users of the management plans.

Sincerely:

Milena Dimitrova
Chair of the Board of CEIE