



Danube River, 2009, July

Secretariat ICPDR
Mr Philipp Weller
Ms Birgit Vogel
Ms Jasmine Bachmann

Dear Mr Weller,
Dear Ms Vogel,
Dear Ms Bachmann,

The Danube Environmental Forum, the umbrella organization of environmental Non Governmental Organizations acknowledges the great work of the ICPDR community and especially of the ICPDR staff to elaborate the Danube River Basin District Management Plan. DEF thanks for the possibilities and the willingness to participate in working groups and task groups. I attended a lot of meetings during the last years and could experience a positive atmosphere of co-operation.

Nevertheless is it our duty from the perspective of the environment, river ecology and conservation to have a critical look on some aspects which are not yet covered in a way sufficient for the task of improving water and aquatic ecosystems, nature services, to come to a long-term oriented sustainable use of water resources. Please take our arguments as a contribution to common objectives for man and the aquatic environment in the Danube river basin.

A general look on the results of data collection and analysis gives us an impression of different main problems in the different regions along the Danube from the source to the mouth at the Black Sea. In the upper region, e.g. in Germany and Austria with a lot of Danube and other river dams, the hydromorphological problems are most important issues. If we go down the Danube the problems of water pollution and water quality are getting more and more important. But a closer look reveals that also in the upper Danube the countries make significant contributions to the load of organic substances and nutrients which goes down the Danube. On the other hand, the

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middle Danube is severely influenced by hydromorphological alterations, too, if we look at the Iron Gates dams. All Danube regions, including the lower Danube, are threatened by new infrastructure projects, e.g. for electricity or inland navigation. In the light of these existing problems and evolving new threats the results, common aims and long-term visions of the Danube River Basin District Management Plan are important for the future.

Heavily Modified Water Bodies

It is not in order to abuse the criteria of the Water Framework Directive for political reasons or for economic profits of private companies with interest in new infrastructure measures. The case of status designation of the Danube in Romania is perhaps the worst example of misuse and misinterpretation of the Water Framework Directive. According to the maps Romania kept its policy to designate the Danube as heavily modified in order to alleviate new and destructive infrastructure projects like new dams or heavy channelling of the river. The Danube in Romania is with a few exceptions, e.g. where banks are fixed at cities, the best conserved large river in Europe. River and sediment dynamics as well as natural banks and a lot of islands give the Danube in Romania and between Romania and Bulgaria qualities to be an example how a large natural river can look like and develop. These stretches of the Danube are never Heavily Modified Water Bodies (HMWB).

The designation as HMWB is contrary to the Water Framework Directive guidelines and to the common principles and technical advises worked out in the Hydromorphology Task Group of the ICPDR. To be designed as heavily modified a water body has to be changed significantly in character with severe morphological and hydrological alterations. If this designation should be kept in the Danube River Basin District Management Plan we regard this a basic violation of the legal aspects of Water Framework Directive implementation. To avoid a deep loss of credibility the Romanian government should change the designation.

Why is the HMWB designation so important? For HMWB we have reduced environmental objectives. This is the reason, why Romania wants to misuse the instrument of HMWB designation for the Danube, although it is not necessary for its objectives to improve navigation. Serbia and Croatia did not design the free flowing Danube and Sava as natural water bodies or as HMWB. This can hide a similar option like in Romania. Although they are not EU members they have a self-committment to fulfil the tasks of the Water Framework Directive. Our demand is to clear this in the next time and design the free flowing Danube and Sava as natural water bodies.

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Germany, in this case Bavaria, is the positive example. Beginning with similar aims like in Romania it was decided on the basis of the guidelines and monitoring data to design the free flowing Danube between Straubing and Vilshofen as a natural river water body. We are waiting for the next step to give up dam planning against a majority of people in Bavaria.

These examples do not cover all problems of correct HMWB designation in the Danube river basin. Provisional identifications of doubtful water bodies have to be verified by sound and transparent monitoring data before a final designation as heavily modified is possible. The countries should foster active involvement of environmental NGOs and fishers to guarantee correct monitoring and designation of water bodies.

Wetland Re-connection and Restoration

A second important issue is the objective of wetland re-connection and restoration which plays a prominent role in the Danube River Basin District Management Plan. This is a good instrument for synergies between flood protection, water quality, biodiversity and climate change adaptation. It helps to reach the objectives of the Water Framework Directive.

In a lot of countries this issue has not really been included in the management plans. Water related and water dependent land ecosystems are of importance for the Water Framework Directive implementation. Wetlands have to be protected from deterioration. We have a lot of factors with negative effects on wetlands and a lot of positive effects for rivers and wetlands if measures are taken to re-connect wetlands and rivers.

In Germany, in Bavaria, wetland re-connection has not been an issue in the programme of measures and in other countries the situation is similar. Instead of this a lot of technical infrastructure is planned nearly everywhere to meet the flood protection objectives. Negatively impressive is a look on the map of infrastructure projects. Hungary has a lot of flood protection infrastructure projects most of the Danube and the Tisza river.

On the other hand Germany, Austria, Hungary and Serbia are the only ones with the objective to realize wetland-reconnection until 2015. This is not satisfying. All countries should make their contribution to wetland-reconnection. Infrastructure projects for technical flood protection should be reviewed under the perspective of wetland restoration as an alternative, technical

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solutions should be confined to the necessary elements to protect settlements. If the heavy weight of measures remains on infrastructure, which mean deterioration in many cases, the objectives of the Joint Programme of Measures are in danger.

Public Participation and Information

In the countries we missed a lot of adequate information and possibilities for participation. Especially at regional levels there often has been no good information material with detailed maps. A lot of information has not been available in time. This should be improved until December. The member organizations of the Danube Environmental Forum are open for co-operation at regional, national and international levels. We hope for improvement of the Danube River Basin District Management Plan. In common commitment it should be a successful tool for the future.

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