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Philip Weller
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ICPDR Permanent Secretariat
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31. July 2009

Public Hearing - Danube Basin Management Plan

Dear Mr. Weller,

Unfortunately, I have to tell you that the Draft Danube River Basin Management Plan is in a stage in which it is impossible to review it. The published draft on your website is an excellent Strategy with a lot of good proposals, but the necessary documents and actions needed for a Management Plan are incomplete or missingⁱ.

The most basic document, which is missing, is **the map of former and current (natural) retention areas and/or floodplains in the Danube Basin**. This is the key information for any River Basin Management. It is not possible to develop a Management Plan without this basic information, which is most important for safety, water quality, water quantity, ground water, fishery, forestry, recreation and biodiversity. Unfortunately though, I could not find such a map on your website.

In the Environmental Assessment for the Central Sava River Basin we, Croatian Waters (HV) and EuroNatur, developed an example, how a management plan should be developed (Brundic et al 2001)ⁱⁱ for a river and its alluvial wetlands concerning flood control, use of the wetlands and biodiversity protection.



Secondly, I doubt that the sentence “**Jointly the countries of the Danube River Basin have developed the draft Danube River Basin Management Plan**” is correct. Croatia is one of the riparian states of the Danube. Knowing the country well, I have reviewed the maps to test the Draft Management Plan and Croatia’s contributions to the plan. I had to realize that most documents necessary for a Management Plan and which Croatia should have made available are missing. This is not indicated in the legends though. Therefore, the goal to use the “ICPDR as a platform to discuss and agree on the transboundary aspect of the management of the water resources” has not been achieved in this Draft Management Plan.

Based on the Croatian example, following gaps in the draft document have to be closed before a sound review is possible:

DRBMP Maps: Here, no information concerning flooded areas and no information concerning reconnection and improvements for Croatia is available.

Map 06 - Wetlands/floodplains with reconnection potential and expected improvement by 2015: no information concerning Croatia.

Map 7 - Hydro Alterations: Data concerning the state of the rivers in Croatia is missing as impoundment (large areas have been separated from the river), hydro peaking (The whole Drava is impacted) and water abstraction

Map 08 – Future Infrastructure: No new infrastructure planned in Croatia - excellent!

Map 29 – Ecological Prioritisation: No data from Croatia.

Only Map 9 is a good example how basic layers in a Management Plan should look like. In this case, Croatia did deliver the necessary data. Only for the Sava River some information is missing.

The Draft Management Plan

- a) is not referring to the Environmental Assessment of the Central Sava Riverⁱⁱⁱ,
- b) is not mentioning the huge retention areas at the Sava and in the Spacva-Bosut depression,
- c) is not informing the ICPDR and neighbouring countries about the impacts of the planned Danube Sava Canal and the planned improvement of navigation^{iv}
- d) is not referring to the actual plans to build new dams and



- e) is not describing the huge potential for restoration and additional retention areas along the Sava, Drava and Danube (compare the EA for the Central Sava Basin and the Vision for the Drava River ^v).

Another example is Serbia, where the Important Bird Areas are missing in the Map 9.

A lot of information has been provided by different programmes for the Danube Basin, which can be used to upgrade the actual version as the maps of the Danube Pollution Reduction Programme.^{vi}

Please inform us when ICPDR has completed the Draft Management Plan and we will be happy to review it.

Kind regards



Dr. Martin Schneider-Jacoby

References

ⁱ http://www.icpdr.org/participate/danube_river_basin_management_plan

ⁱⁱ http://www.euronatur.org/fileadmin/docs/projekte/Save/Flood_Protection_2001.pdf

ⁱⁱⁱ http://puo.mzopu.hr/UserDocsImages/Sazetak_110520091.pdf

^{iv} <http://www.euronatur.org/EuroNatur-Projekte-in-den-Save-A.912.0.html#c5797>

^v http://www.euronatur.org/fileadmin/docs/projekte/DRAVA_Vision_final_06042009.pdf

^{vi} DPRP - Danube Pollution Reduction Programme (PCU UNDP/GEF) (1999): Evaluation of Wetlands and Floodplain Areas in the Danube River Basin, Final Report, May 1999 prepared by WWF Danube Carpathian Programme and WWF-Auen-Institut