

ICPDR Permanent Secretariat
Vienna International Centre, Room D0412
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Ladies and gentlemen,

First of all, we want to thank you for your efforts in establishing the Danube River Basin District Management Plan (RBMP), an important step in implementing the Water Framework Directive in the European Community and beyond.

As VGB Powertech e.V., the European technical association for power and heat generation, we are interested in the implementation of the Water Framework Directive and are also in some ways concerned by the Danube River Basin District Management Plan.

We absolutely agree with the prioritisation on main rivers and the importance of river continuity.

However, we always have to keep in mind the importance of the production of renewable energy, especially by hydro power on the Danube river. Especially in Austria, the energy production generated by hydro power plants on the Austrian Danube plays an important role for the security of energy supply for the whole country.

Furthermore, in a broader European context, different directives like the “Directive on the promotion of electricity from renewable energy sources in the internal electricity market” (2001/77/EG) or the “Directive on the promotion of the use of energy from renewable sources” (2009/28/EC) stress the importance of renewables in Europe.

The topic of hydro peaking is a major issue concerning security of energy supply, not only in Austria, but throughout Europe. This is the reason why the subject of hydro peaking has been strongly considered in the Austrian River Basin Management Plan.

While there are only a few future infrastructure projects on hydro power listed in the Danube River Basin District Management Plan, we want to point out, that there are nevertheless many project ideas concerning hydro power. At the moment, though, there are hardly any certain projects available due to different circumstances.

Along these lines, we would like to mention some points of the Danube River Basin District Management Plan, where we still have several questions:

- Where can we find Map number 27?
- Annex 13:
 - Danube:
 - at the water body AT410360002, the ecological potential is designated as 5, in the Austrian RBMP this water body is designated as 3
 - Drau:
 - AT90377000 is designated as 2, in the Austrian RBMP it is 3
 - Mur:
 - AT802710012 has no exemption art. 4(4), in the Austrian RBMP it has one for 2021
 - Why are the water bodies AT802710014 and 0015 not listed?
 - Salzach:
 - AT304690001 and AT305360001 is reported as hmwb, both are not designated as hmwb in the Austrian RBMP
- Map number 5: why are the hydro power plants Melk (Danube) and Villach (Drau) designated with barriers not passable for fish? Both of them have already a functional fish passage.
- Map number 7: why does hydro peaking occur on the Danube and south from Graz on the Mur?
- Map number 28: there are differences between the results of the Austrian RBMP and the DRBMP
 - Danube:
 - hydro power plant Melk is already passable for fish
 - hydro power plant Altenwörth: continuity until 2021
 - hydro power plant Wallsee-Mitterkirchen: continuity until 2021
 - Drau:
 - hydro power plant Villach is already passable for fish
 - Mur: as it is difficult to distinguish the different hydro power plants, we list all hydro power plants as in the Austrian RBMP
 - hydro power plant Bodendorf-Mur/Bodendorf-Paal: after 2015 (until 2015: feasibility study)
 - hydro power plant St. Georgen: after 2015 (till 2015: feasibility study)
 - hydro power plant Fischen: already passable
 - hydro power plant Leoben: already passable
 - hydro power plant Dionysen: already passable
 - hydro power plant Pernegg: already passable
 - hydro power plant Laufnitzdorf: already passable
 - hydro power plant Rabenstein: already passable
 - hydro power plant Peggau: already passable
 - hydro power plant Friesach: already passable
 - hydro power plant Weinzödl: 2021

- hydro power plant Mellach: 2021
- hydro power plant Lebring: 2021
- hydro power plant Gralla: 2021
- hydro power plant Gabersdorf: 2021
- hydro power plant Obervogau: 2021
- hydro power plant Spielfeld: already passable

We would appreciate if you could change these points, so that the Danube River Basin District Management Plan and the Austrian River Basin Management Plan are in line.