



DANUBE RIVER BASIN DISTRICT MANAGEMENT PLAN – 2021 UPDATE STATEMENT OF WWF CEE

As long-term NGO observer, WWF Central and Eastern Europe appreciates the progress that has been made in Danube river basin management planning over the past two decades such as moving sturgeon conservation, wetland restoration or climate change adaptation more into the focus. We would also like to highlight our satisfaction with the numerous opportunities provided to WWF for engaging in ICPDR discussions and processes and very much hope that such a transparent approach has been replicated at national level for this consultation round and will be applied in future river basin management processes.

KEY HIGHLIGHTS

Despite the fact that there are still monitoring data gaps and filling these gaps has to continue, the scientific methods for data collection and resulting information significantly improved over the past decades. Thus the knowledge base is sufficient for the next WFD cycle to focus on **implementation**. In the following paragraphs we will highlight some implementation priorities (*please also see specific comments and editorial suggestions further down in this document*):

Restoration

We believe that the need and potential for river and wetland restoration is much higher than what is in the Plan.

It is clear to us that many small scale projects may not appear in this Danube basin level plan that together might have certain impact, but believe, more larger scale projects and an implementation push are possible and necessary if the following will happen:

1. **focus on integrated solutions** that solve several problems at the same time such as flood management, drought mitigation, water quality improvement or biodiversity objectives with a longer term perspective.
2. **overcome the blockage by the agricultural sector by providing the right incentives**. This entails in particular the opening of **CAP Pillar 1 direct payments for water retention on arable land** and amendment of **land use regulations to support water retention on**

agricultural lands, as well as inclusion of **WFD compensation schemes in the CAP Pillar 2 for restrictions of certain land use** such as water drainage, time of seeding, or irrigation due to **conservation measures**.

3. **Building capacity** in authorities for planning and implementing restoration and conservation measures together with key sector representatives, such as agriculture, flood mitigation, nature conservation, forestry.
4. **Preparing a pipeline of projects** including feasibility studies, stakeholder engagement, and agreements with land-owners, technical design and permits and funding allocation.
5. **Allocating financial resources** e.g. from the National Recovery and Resilience budgets, the Operational Programmes and Common Agricultural Policy funding lines to the Programmes of Measures.

Fish biodiversity

As the JDS4 has shown, hydromorphological pressures on fish are apparent along the whole Danube and there is no general improvement since the last Plan. However, measures that are likely to improve the status of fish are largely limited to fish passes with various levels of ambition.

Romania, to give one example, indicates as current status 116 river continuity interruptions while only 1 fish migration aid is planned. It is difficult to understand why the level of ambition is so low if e.g. Bulgaria aims for considerably more.

We recommend countries to increase the number of measures for improving longitudinal connectivity in both Danube basin (chapter 8.1.5.2.1 Interruption of River Continuity for fish migration) **and national plans and for the coming years as matter of priority. This entails the performance of restoration potential analyses on rivers, then preparation of a pipeline of implementation projects, including stakeholder involvements, for fish migration aids but also other measures, such as barrier removals** (especially of obsolete dams).

While sturgeon conservation is woven into several chapters of the plan - which we appreciate - we see **the need to include identification, restoration and monitoring of habitats of migratory fish species, in particular sturgeons**, in the chapter River Morphological Alterations and to commit to closer cooperation between water management authorities and authorities responsible for nature protection and biodiversity.

As the integration chapter 6.4. on navigation concludes, the **impact of vessels on fish fauna** is likely to be considerable, judging from a pilot study on the Austrian Danube. The development of **mitigation measures should therefore be included** in the Joint Programme of Measures.

Hydropower and navigation

As the DRBMP states well, the implementation of the “Guiding Principles on Sustainable Hydropower Development in the Danube Basin” is behind schedule. In order to achieve a considerable change, hydropower would require a drastic transformation of operation and approaches in order to play a role in sustainable energy supply. **The DRBMP should state more clearly that new hydropower**

infrastructure in Danube countries should be avoided as there are renewable energy alternatives with lower negative impacts on ecosystems. Therefore, financial incentives such as subsidies for new hydropower development on rivers, big or small, have to be stopped.

The hydropower sector needs to improve environmental performance by:

- **upgrading of existing hydropower plants both in terms of power generation and environmental mitigation** (e.g. installing functioning fish passes (e.g. Iron Gates), habitat restoration) **as well as removal of dams** (esp. obsolete ones)
- **committing to biodiversity conservation objectives** (e.g. action plans for migratory fish), **sediment management, and environmental flows**
- **covering full costs for mitigation action and if that is not possible, hydropower plants have to be decommissioned.**

Concerning inland waterway transport, the ongoing and planned navigation infrastructure projects made clear the formidable challenges of meeting navigation as well as WFD and nature conservation objectives but also the possibility of doing so if there is a strong will. This path has to be followed. **If there are indications that previously built fairway infrastructure has negative environmental impact, mitigation measures must be planned and implemented. Missing waste treatment facilities for passenger ships and the impact of waves on fish are other challenges** to be tackled as matter of priority.

DETAILED COMMENTS

Restoration, hydromorphology:

- 8.1.5.1 Hydrological Alterations, hydropeaking: WWF believes that not all significant hydropeaking cases have been detected judging from field observations and the disbalance of hydropeaking reported per country (e.g. no cases in RO, 27 in AT). We therefore urge countries to spend more efforts on monitoring hydropeaking of dams (e.g. Iron Gates) and designing mitigation measures where relevant.
- *„The inter-linkage with national RBM Plans is vital for wetlands/floodplains reconnection as significant areas are expected to be reconnected also to rivers with catchment areas <4,000 km² and with surface areas <500 ha having also positive effects on the water status and habitats of larger rivers.”* (8.1.5.3.2.3 Summary of Measures of Basin-Wide Importance, page 149).

Referring to this note, due to the cumulative effect, we recommend to indicate in the Danube basin plan also the cumulative figure of areas under 500 ha/country. Otherwise the level of restoration ambition of countries cannot be properly evaluated.

- Disconnection of Adjacent Wetlands/Floodplains (chapter 8.1.5.3.2.) and Map15 – reconnection potential: The threshold of 500 ha seems too large on this map and as a result the map shows almost no reconnection potential. Due to that, map 15 is not in harmony with the chapter 6.1, 6.2, 6.3 of the draft FRMP2, since these chapters communicate significant NWRM potential and the message that countries as matter of priority are to apply NWRM wherever possible. This statement isn't confirmed by map15, if the 500 ha threshold is not decreased.

We suggest to include in the workplan of ICPDR HYMO EG to reconsider this problem and adjust messages and measures (in favour of larger NWRM ambitions).

- In the chapter on Disconnection of Adjacent Wetlands/Floodplains (chapter 8.1.5.3.2.) several countries indicated low ambition regarding restoration, although the potential for reconnection of floodplains is much higher. The plan should indicate the objective of preparing a pipeline of projects for implementation and creating (at national level) the right enabling conditions (financial, legal, capacity):

- Hungary indicates only 552 ha for Wetlands/floodplains with reconnection potential 2021 with the job already finished. Nothing is planned for 2027. In the DTP Danube Floodplain project Hungary stated 71.220 ha (712,2 km²) wetlands/floodplains with reconnection potential. We expect these areas will be included in the final plan.

HU Danube (name/potential floodplains and km²) :

Total of 395,6 km²: Szigetköz 157,1 km², Paks 22,1km², Veránka-island 161,7km², Béda-Karapanca 54,7km²

HU Tisza (name/potential floodplains and km²) :

Total of 316,6 km²: Milota 20,9km², Tiszadob 39,4km², Tiszadorogma 31,1km², Pély 36,2km², Nagykörű-Szajol 40km², Szolnok Tiszaug 91,4km², Lakitelek-Csongrád 57,6km²

- Romania stated 21,543 ha wetlands/floodplains with reconnection potential 2021, and 2,650 ha wetlands/floodplains totally reconnected by 2027. We are aware of the intention to include the DTP Danube Floodplain project results into the final DRBMP, but would like to highlight here that the 3rd Romanian draft RBM already includes 100.000 ha as potential where the key areas, larger than 500 ha are:

Desa 8276 ha , Bistret-Bechet 27972 ha, Bechet-Tumu Magulere 30972 ha, Trainan – Zimnicea 20450 ha, Nastuleru 3169 ha, Borcea Buliga 858 ha, Garliciu 1083 ha, Tichilesti 31808 ha.

- We see low restoration ambition also in case of Slovakia. 5,117 ha Wetlands/floodplains with reconnection potential 2021, and only 7 ha (!) wetlands/floodplains totally reconnected by 2027, extension of deadline (article 4.4) on 5,110 ha.

We recommend allocating funds and capacity to develop restoration potential analyses on rivers and prepare a pipeline of projects ready for implementation. EU Structural or Recovery and Resilience Funds, CAP and other sources are available for this purpose.

- Bulgaria didn't outline any areas with restoration potential and planned measures in the draft 3rd DRBMP. However, there are wetlands included in the National action plan for Conservation of Wetlands of High Significance in Bulgaria 2013-2022 in particular Mechka fishponds (570ha) and one just below the threshold of 500 ha (Orsoya fishponds, 475 ha).

Wetlands already reconnected with Danube river but in need of additional measures for improvement of the hydrological regime according to the National action plan for Conservation of Wetlands of High Significance in Bulgaria 2013-2022 (*note: in the Action plan higher ha figures are given as they include not only the wetland itself but also other territories included in the corresponding protected site/area*).

Belene Island (Persina) Wetlands - 2200 ha

Kalimok - Brrushlen wetlands - 2000 ha

Srebarna Lake - 900 ha

- In Ukraine, 43,556 ha are stated as Wetlands/floodplains with reconnection potential 2021, but with “No measures yet indicated” while the need for floodplain reconnection was clearly highlighted in the "Yearly Report 2020 of Law Danube Basin Water Management Authority". According to WWF’s discussions with key governmental experts, a minimum of 10% of this could and should be reconnected within the next WFD cycle.
- In line with our highlights at the beginning of our statement regarding restoration, we recommend the following additional measures (with blue colour) to be specified under chapter Disconnection of Adjacent Wetlands/Floodplains (chapter 8.1.5.3.2.):

The following management objectives will be implemented by 2027 as steps towards the vision:

EU Member States, Candidate Countries and Non-EU Member States:

- ⇒ *For the DRBMP Update 2021, efforts will be continued and further measures will be identified for the conservation and restoration of existing and the restoration of former (potential) wetlands/floodplains with reconnection potential to ensure biodiversity, the good status in the connected river, flood protection, drought mitigation and pollution reduction. Beneficial effects are expected to be manifold, including improvements like the provision of fish habitats for spawning, nursery and feeding.*
 - ⇒ *Specification of number, locations and area of wetlands/floodplains that will be reconnected and restored by 2027 by each country based on restoration potential analyses making best use of the EU funded Danube Floodplain project results (see below) and other available analyses prepared in the 2nd cycle.*
 - ⇒ *Development of a pipeline of projects with applications for funding*
 - ⇒ *e.g. from the National Recovery and Resilience budgets, the Operational Programmes and Common Agricultural Policy funding shaped to more effectively support the Programmes of Measures*
 - ⇒ *engagement with agricultural policy makers towards amendment of land use regulations (where necessary) to support water retention on agricultural lands,*
- In the chapter “8.5. Financing the Joint Programme of Measures” on page 164:
 - in the table on financing instruments for EU countries, add under Hydromorphological Alterations for both “Interruption of river continuity and hydromorphological alterations” and “Reconnection of wetlands/floodplains” the instrument NextGenerationEU

- correct in the list of main EU funds eligible for different elements of floodplain and wetland restoration: “For field work: [European Regional Development Fund](#), EARDF, and LIFE+.
- add as bullet point to the paragraph starting with “Furthermore, several additional instruments/organization exist that are potentially relevant for acquiring financing in the context of WFD implementation for all pressures in the DRB”
 - [CAP Pillar 1 direct payments for water retention on arable land to provide incentives for wetland restoration](#)
 - [inclusion of WFD compensation schemes in the CAP Pillar 2 for restrictions on land use such as water drainage, time of seeding, or irrigation due to conservation measures.](#)

Sediment

Chapter 8.1.5.2.2.2. & 8.1.5.2.2.3 :

We appreciate the knowledge base and recommendations the DTP Sediment project concluded and urge countries to allocate funds for preparation of respective measures and implementation.

We urge countries to release a ban on sediment extraction from the Danube riverbed for commercial purposes (at least in river sections part of NATURA 2000 sites with fish/aquatic invertebrate species listed for protection) .

Fish biodiversity

- We recommend the following additional measures to include in chapter 8.1.5.2.1.1 Interruption of River Continuity for fish migration – Vision and management objectives (new wording with blue) :

⇒ *Engage with authorities responsible for energy and climate with the objective of*

⇒ phasing out financial support schemes for hydropower

⇒ coupling new permits and the upgrade of existing hydropower plants with investment in up to date environmental mitigation measures in line with WFD and nature conservation policies

⇒ *Construction of fish migration aids and other measures at existing migration barriers, as well as removing barriers to achieve/improve river continuity in the Danube River and in respective tributaries to ensure self-sustaining sturgeon populations and specified other migratory fish populations.*

⇒ Specification of number and locations of fish migration aids and other measures, including potential barriers for removal to achieve/improve river continuity that will be implemented by 2027 by each country.

⇒ Standardize and harmonize methodologies for assessment, prioritization, implementation of barrier / dam removal as well as for establishing passing solutions.

Also please see comment under maps (map 13) at the end of the document.

- We recommend to supplement the existing river continuity measures with the following key specific measures (with blue colour) for habitat or population restoration in line with vision and objectives (chapter 8.1.5.3.1 “River Morphological Alterations”):

- ⇒ *Restoration/mitigation of river morphological alterations and habitats to ensure improvement of aquatic ecosystems and water status.*
 - ⇒ *Specification of location and extent of measures for the improvement of river morphology that will be implemented by 2027 by each country*
 - ⇒ *Restoration of habitats of migratory fish species, in particular sturgeons*
 - ⇒ *Based on the results of MEASURES, complete the identification of habitats for migratory fish species and the assessment of their protection status to address the remaining gaps of a network of critical habitats and complete the map produced by the MEASURES project.*
 - ⇒ *Assess habitat functionality by monitoring the migratory fish populations and their habitat use*
 - ⇒ *Establish working relations with authorities responsible for nature protection and biodiversity in Contracting Parties, who will be closely associated in achieving this mission*
 - ⇒ *strengthen working relations with the EUSDR Priority Area 1a and national inland waterway authorities to perform studies on the impact of waves on fish and agree on measures with the aim of developing a comprehensive set of measures for impact mitigation for the whole Danube and its tributaries*
 - ⇒ *extend necessary working relations in the Black Sea region to address the marine part of the life cycle of (anadromous) migratory fish species*

- We recommend the following additional measures to include in chapter 8.1.5.4.1 Future Infrastructure Projects – Vision and management objectives:

⇒Engage with authorities responsible for energy and climate with the objective of phasing out financial support schemes for hydropower

Integration

- We recommend to add to chapter 6, Integration Issues (pag. 90), after the first sentence as follows (in blue):

The integration with other sector policies is an important issue in the Danube River Basin in order to create synergies and avoid potential conflicts. Activities are ongoing to continuously implement and further intensify the exchange with different sectors such as inland navigation, hydropower, agriculture, and nature protection including sturgeon conservation activities. The Local Migratory Fish Networks established in several Danube countries in the MEASURES project have proven to be good platforms for stakeholder discussion and debates on a specific target and can be used as a basis for future efforts.

- To chapter 6.4., Inland Navigation and the Environment (page 96), add the following bullet point to the existing list
 - *Promote as much as possible non-structural measures and minimise the impacts of structural interventions through mitigation and/or restoration and giving preference to reversible interventions.*

It is also suggested to add a paragraph at the end of this chapter:

Another emerging challenge that needs further investigations and agreement on measures is the impact of the growing passenger transport on water quality due to a lack of suitable waste collection and treatment facilities on land.

- 6.5 Sustainable hydropower chapter:

We recommend to add or emphasize the following key messages (in blue) in order to meet WFD requirements and implement the approach of the “Guiding Principles on Sustainable Hydropower Development in the Danube Basin” in the paragraphs on page 98/99:

“Undoubtedly, hydropower will remain an important pillar of the Danube region’s renewable electricity portfolio. However, in relative terms its contribution to overall production is expected to fall due to the expected massive expansion of wind power and solar photovoltaic system while the impact on riverine ecosystems will remain an outstanding water management issue as mitigation measures are being implemented at varying speed and effectiveness across the Danube basin. Generally, the strategic need for additional hydropower development should be defined in an overall power system planning process....”

- 6.2. River Basin Management and the Marine Environment:

Add at the end:

“Other issues include e.g. the migration of anadromous migratory fish species like sturgeons from the Black Sea to the upper reaches of the Danube. With respect to the latter, the ICPDR and the Contracting Parties will use the dialogue between ICPBS and ICPDR parties to analyse and agree on sturgeon conservation actions.”

- 6.6 Agriculture chapter and chapter on Nutrient pollution (8.1.2.3.), as well as 8.5 Financing PoM to add (in blue):

The dialogue started between ICPDR and the agriculture sector is very welcome since this sector is among the key stakeholders in river basin management and floodplain/wetland restoration efforts. We therefore propose to highlight the role of this dialogue in overcoming obstacles to hydromorphological measures by adding the following measures to the provisions:

In order to effectively engage and gain the support of the agricultural sector for change in land use or land use management necessary for floodplain/wetland restoration, the following incentives have to have be created:

- *opening CAP 1st pillar direct payments for water retention on arable lands*
- *amending land use regulations to support water retention on agricultural lands.*
- *including in CAP 2nd pillar WFD compensation schemes for restrictions on land use such as water drainage, time of seeding, or irrigation due to conservation measures.*

MAPS

Map 13, river continuity:

We would like to ask for justification for the data points in the map showing dams passable for fish. According to our knowledge or field observations, some of them are questionable. The existence of a fish pass doesn't automatically mean it is functioning and passable for fish. For example the 3 dams on the Drava near to the confluence with Mura have fish passes not designed for the fish species living in the Drava. Also based on field observation, the Dubrava dam doesn't ensure water in the fish passes throughout the year. In Romania, on the Olt, several dams are indicated on the map as not passable for fish, but GES/GEP achieved. We are wondering how this can be.

Map14, alteration of river morphology:

We suggest adding a measure to update and/or harmonise methodologies for defining morphological conditions on joint (transboundary) river stretches which flow along borders. The classification of morphological conditions is the same on the SK-HU Danube between Gönyű-Szob, on the RO-BG Danube stretch or on the SK-HU Ipoly. But they are different on the SK-HU Danube upstream Gönyű, or the HR-HU Drava. The difference between the categorization is quite significant on the HR-HU Drava (class4-5 in Croatian and class 1 in Hungary). This raises several questions about the methodology and it is hard to evaluate which category reflects the real water body status.

Maps 34, 35, 36, 37, 38, 39

These maps show the expected improvements of hydromorphological alterations. We don't find either in the main text of the plan, nor in the list of main measures how these predicted improvements will come about. We recommend making this an item of the upcoming work plan and data collection template of the HYMO TG for higher transparency, knowledge sharing and joint learning among the countries.

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