



Common NGO position on navigation in the Danube basin

The purpose of this paper is to present a set of key recommendations that the undersigned NGOs believe should be followed if navigation on the Danube (hereafter meaning the main stem, navigable tributaries and accompanying floodplains) is to become environmentally sustainable. The paper aims to guide relevant planners, developers and policy makers towards wise, forward-looking decisions.

Our vision of the Danube River is a lifeline where ecology and river users/uses (including navigation) thrive hand-in-hand to provide life and ecosystem services, as well as to continue supporting the livelihoods of the people who live in the Danube basin.

We appreciate the role inland navigation plays as contribution to the European transport sector and recognize that it satisfies specific social and economic needs of Danube states. However, river engineering projects for improving the conditions of inland navigation should only be implemented or continued if they:

- a) Guarantee and regain **functioning ecosystem processes** (amount, quality and timing of water and sediment flows required by ecoregion specific freshwater and estuarine ecosystems and human livelihoods to sustain themselves)
- b) Respect **socio-economic needs** of regional and local economies
- c) Prove that they meet all **legal requirements**, in particular compliance with the non-deterioration clause of the European Union's Water Framework Directive (hereafter WFD) as well as achievement of the environmental objectives of the Danube River Basin Management Plan and Natura 2000 sites
- d) **Do not require new dams** or barrages on waterways.

The NGO community calls upon decision makers to ensure that:

1) at the international, EU and basin level

- **A Master Plan for Sustainability of the Danube basin** is developed and agreed to improve spatial planning for conserving and improving the biodiversity, and keeping the Danube River as one of the most important “blue” and “green” axes for Europe. It should recognize the importance of ecosystem maintenance and restoration as the fundamental basis for economic development and human well-being. This would ideally be drafted under the auspices of the ICPDR and could be linked to existing initiatives (e.g. the European Danube Strategy). The NGO community should be invited to give advice on the Terms of Reference and guiding principles of such a document. The identification of specifically sensitive areas, such as existing protected areas and the identification of possible or necessary improvements for nature (e.g. measures to reconnect river sections as far as possible or even the removal of existing dams or barrages) needs to become an important part of it. Once this first step is taken, a sustainable transport plan fitting the umbrella of this Master Plan has to be developed as a follow-up to the TEN-T Programme.

- **More resources are allocated** for a) this Master Plan and nested regional and sectoral plans, b) planning and implementing river restoration measures to

reverse old-fashioned and inappropriate practices of river regulation works, and c) bottom-up and genuine public participation processes.

- **Robust SEAs** based on the principles of the SEA Directive should be carried out for all Danube basin navigation plans and programmes, together with strategic Appropriate Assessment of impacts on Natura 2000 sites, making best use of the Rail Baltica example. The SEA Directive should be amended to ensure that it applies to all Member State and multi-Member State level navigation (and other sectoral and land use) plans which may affect the Danube.

- **Recommendations of the Danube Commission are revised** in order to enable solutions best adapted to the local environment and are not used as project goals because the Danube Commission is biased towards the navigation sector. Their recommendations should be discussed by all the relevant stakeholders. Along the same line, the UNECE AGN is revised (as well as the underlying UNECE waterway class system) and only serves as a guideline and not a project goal.

- The **Joint Statement** process delivers on a new

sustainability model that puts ecosystem health first.

- The **European Commission** establishes and applies a fully operational system to scrutinise spending on inland navigation transport measures and rejects projects that are likely to damage Natura 2000 sites or work against WFD objectives.

2) the national level of Danube countries and Sava countries

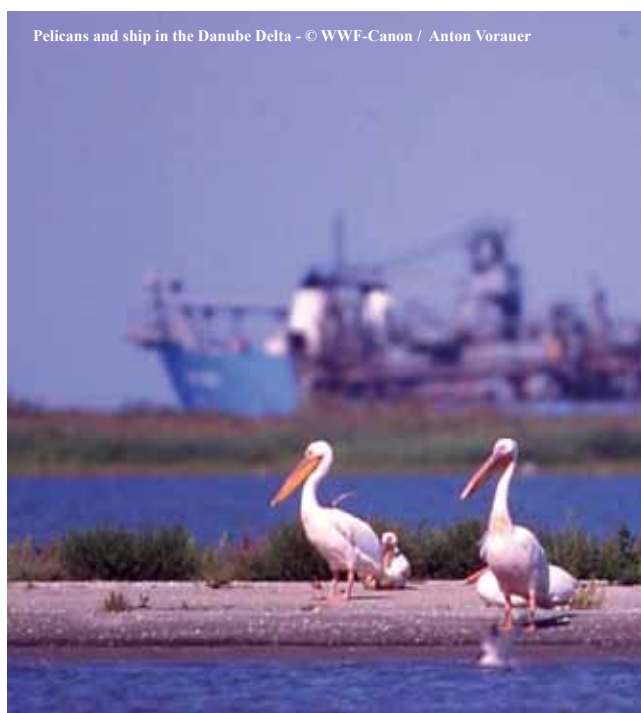
- More resources are allocated for fostering bottom-up and genuine public participation processes.

- The **SEA and Habitats Directives** are applied properly to national navigation plans and programmes ensuring that high quality SEAs and strategic Appropriate Assessments are undertaken for national sections of the corridor, as well as robust EIAs and project level Appropriate Assessments for individual projects.

- **EU and national water legislation** is properly implemented and is at the centre of the efforts to tackle threats from, transport challenges, climate change and invasive species.

The full version of the position paper is available for download at:

http://www.panda.org/what_we_do/where_we_work/black_sea_basin/danube_carpathian/our_solutions/freshwater/sustainable_navigation/wwf_position/



Pelicans and ship in the Danube Delta - © WWF-Canon / Anton Vorauer

Agreed by:

Birdlife International
BUND - Friends of the Earth, Germany
Bund Naturschutz Bayern
Croatian Society for Bird and Nature Protection
Danube Environmental Forum
Danube Youth Club, Ukraine
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Ribiska Zveza Slovenije
Salvati Delta Association
Transport & Environment
Verband Deutscher Sport-Fischer
VIRUS
WWF
Youth Ecological Centre V.I.Vernadsky

Contact:

WWF Danube-Carpathian Programme Office
Mariahilferstrasse 88a/3/9
1070 Vienna, Austria
Email: office@wwfdcp.org
Phone +43 1 524 54 70; Fax: +43 1 524 54 70 70