



To:

Ministers responsible for water management of the Danube basin
Virginijus Sinkevičius, EU Commissioner for the Environment

Cc: ICPDR Heads of Delegation; ICPDR Executive Secretary

Subject: ICPDR Ministerial Meeting and Declaration 2022

27 January 2022

Dear Ministers, dear Commissioner,

You or your State Secretaries will soon attend the virtual Danube Ministerial Meeting on 8 February to endorse the Danube River Basin Management Plan (DRBMP) for the six years to come and adopt a declaration on focus topics for cooperation of the parties to the International Commission for the Protection of the Danube River (ICPDR).

As NGO observers to the ICPDR, we have appreciated being, for the first time, consulted in October 2021 on the draft Outline of the Declaration. We have not subsequently had the opportunity to follow the evolution of the draft Declaration. Considering this and the inherently limited scope for exchanges at the online meeting, we present you below with some views on important issues which we believe merit a particularly high degree of ministerial attention and support in the coming years and therefore also need particularly high visibility in the Declaration.

1) Develop clear pathways toward a long-term vision in a participatory manner

The Joint Programme of Measures of the Danube River Basin Management Plan is based on a document that defines Significant Water Management Issues. This document and previous versions contain well-phrased vision statements but lack a target date and milestones. This makes actions listed for each vision statement appear arbitrary, as it is not clear how and when they will add up to achieving the long-term goals.

The forthcoming process of drafting the Significant Water Management Issues document will start in 2024 and provide an opportunity for setting a target date – our suggestion would be 2050 – for vision statements and consequently outlining pathways with a logical sequence of milestones tied to the relevant Water Framework Directive deadlines that lead towards achievement of goals. Such a combination of long-term goals and a staged approach with milestones has been successfully applied by Ministers in the Rhine Basin. Each of the future 6-year Danube Water Management Plans would be nested within these pathways. This would tell a much more compelling story and focus resources. Our strong recommendation is to engage the ICPDR parties, stakeholder community, and the public in a discussion process on future

visions and pathways, framing this dialogue as a critical tool for achieving sustainable development in the Danube Basin.

2) Strengthen the emphasis on biodiversity conservation and working with nature

The urgent need for action on biodiversity conservation has been gradually moving into the focus of public attention, recognizing its interlinkage with climate action and synergy with water management objectives, the dire state biodiversity is in, and its role in securing the ecosystem services on which we depend. Therefore, we believe that some biodiversity objectives require your increased attention:

- Securing a basin-wide transboundary network of habitats and ecological migration corridors for migratory species, including the sturgeon flagship species of the Danube, by conserving key biodiversity freshwater habitats and re-connecting blocked migration routes within the basin and to the Black Sea.
- Investing massively in the preparation and implementation of measures building on nature-based solutions instead of conventional engineering solutions for flood and drought mitigation and good water quality as they will provide biodiversity co-benefits and strengthen the resilience to the impacts of climate change.
- By 2024, decide on the re-establishment of fish passage at the Iron Gates dams, reconnecting the Lower Danube with the Middle Danube. The four remaining Danube sturgeon species are on the verge of extinction, two are already extinct in the Danube. The technical feasibility of re-establishing fish passage has now been confirmed by the EU-financed We Pass project and a new study, also financed by the EU, will be finished by March 2024 providing preliminary design and costings for fish passage facilities. There is no more time to lose!
- Appreciating the first-ever five-country Biosphere Reserve Mura-Drava-Danube established in September 2021 as an opportunity to prove to the world in the years to come that nature conservation and sustainable water management can be an engine for future-proof local development.

3) Step up intersectoral cooperation

- Commit to facilitating the close and active cooperation between water managers and authorities in charge of nature conservation in the Danube Basin and the Black Sea to avoid duplication of effort and more effectively share resources such as data and integrate plans for higher impact.
- Mobilise support from the water management and nature conservation stakeholder community, particularly non-governmental organisations, for a more assertive dialogue with authorities responsible for agriculture and fisheries in order to achieve full policy integration.

We hope that you find our suggestions useful and we would be more than happy to engage with you, respectively, your cabinet in further discussions on the Declaration and beyond.



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