



# **Summary of the public consultation on Interim Overview of the Significant Water Management issues in the Sava River Basin**

**Prepared by the Secretariat of the ISRBC**

**2018**

This paper briefly summarizes the public consultation process conducted during the preparation of the Interim overview of Significant Water Management Issues in the Sava River Basin (SWMIs), including the analysis and justification of the comments received through web based consultation on the draft document.

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## List of Acronyms

FASRB	Framework Agreement on the Sava River Basin
ISRBC	International Sava River Basin Commission
NGO	Non-governmental organisation
PEG RBM	Permanent Expert Group for River Basin Management
PoM	Programme of Measures
PP	Public participation
RBM	River Basin Management
SRBA	Sava River Basin Analysis
SRBMP	Sava River Basin Management Plan
SWMI	Significant Water Management Issues

## 1. Introduction

Public participation is one of the core principles in sustainable water management as required by the Water Framework Directive (WFD) and Framework Agreement on the Sava River Basin (FASRB). This document presents the public consultation process carried out by International Sava River Basin Commission (ISRBC) on the interim overview of the significant water management issues (SWMIs) in the Sava River Basin.

The first Sava River Basin Management Plan (SRBMP) had been developed between 2009 and 2013, and approved by the 5th Meeting of the Parties held on December 2, 2014 in Zagreb (HR). In this process, the document on Significant Water Management Issues (SWMIs) has been prepared. The interim overview of SWMIs has been prepared by Permanent Expert Group for River Basin Management (PEG RBM), in cooperation with other relevant expert groups of ISRBC. It set out the key issues affecting the water environment in the Sava River Basin, as an important step towards preparation of the 2nd SRBMP. The document provides an overview of the SWMIs which need to be addresses in the 2<sup>nd</sup> SRBMP taking into account the progress of implementation of the Programme of Measures identified in the 1<sup>st</sup> Plan.

The report builds on the knowledge gained in the process of preparation of the 1st SRBMP and on additional information on the relevant issues collected by ISRBC as well as by International Commission for Protection of Danube River (ICPDR).

## 2. Web-based public consultation on the draft SWMIs paper

### 2.1. Public consultation process

By related conclusion of ISRBC, the SWMI document was made available to the public for review and providing comments. The online public consultation process ran from 29 July 2016 until 20 October 2016.

The web page: [www.savacommission.org/announce\\_detail/63](http://www.savacommission.org/announce_detail/63) offered a possibility to the interested public to respond to the consultation online, by submitting comments or suggestions in the form provided on the site (Figure1).

Figure 1: SWMIs consultation form

**Significant Water Management Issues in the Sava River Basin  
- Interim Overview -  
CONSULTATION FORM**

Full name \*

Organization \*

Street

Town / City \*

Country \*

Phone

E-mail

Web address

Type of respondent \*  
 General public  
 Ministry or other high level state authority  
 Regional / local authority  
 River Basin District Agency / Organization  
 Protected Area Authority  
 NGO; Civil society  
 Research / Education  
 Industry / Interest group  
 Other (please specify)

Concerns Chapter  page  of SWMIs

Suggestion / Comment / Remark

\* mandatory fields

NOTE: Filled form should be send to e-mail: [isrbc@savacommission.org](mailto:isrbc@savacommission.org) by October 20, 2016.

## **2.2. Analysis of received comments**

A total of 26 comments on the draft SWMI paper were received. All of them were taken in consideration immediately after the deadline for consultation, during the PEG RBM 32nd meeting, held on 20-21 October 2016. List of the respondents to the consultation is provided in Appendix A of this document. The list with received comments, related responses and information on how the comments affected the text of the documents is provided in Appendix B.

## **2.3. Response Process**

During the response process PEG RBM justified 19 comments while 7 comments were not accepted. Out of 19 justified comments, for 11 comments it was concluded that the corrections/enhancements in the final text of the SWMIs paper should be made.

A detailed overview of the comments, their justification and how they influenced the SWMIs paper can be seen in Appendix A of this document.

PEG RBM, as the expert body of the ISRBC, agreed upon changes in the document at its 32<sup>nd</sup> meeting. The document was confirmed by PEG at its 35<sup>th</sup> meeting, held in Zagreb on January 23-24, 2018. The final draft was, thereafter, submitted to the ISRBC for adoption. ISRBC accepted the document on 48<sup>th</sup> Session held in Zagreb on February 20-21, 2018.

The final version of the SWMI paper is available on the ISRBC web-site.

## **Appendix A**

### List of respondents to the consultation

**Appendix A: List of the respondents to the web-based consultation on draft SWMI paper**

No.	Organization/Individual	Name of the person commented on behalf of organization/ individual	Number of received comments
1	Institut za hidrotehniku d. d. Sarajevo	Tarik Kupusović	5
2	SAVSKE ELEKTRARNE LJUBLJANA d.o.o.	Blaž Pišek	2
3	WWF Adria	Irma Popović Dujmović	3
4	World Organization for Nature	Goran Sekulić	6
5	Croatian Society for Bird and Nature Protection	Tibor Mikuška	9
6	ICPDR	Edith HOEDL	1
			26



## **Appendix B**

List with received comments and related responses

## Appendix B: Received comments/suggestions/remarks within the public consultation period 29.07.2016.-20.10.2016.

Nr.	Name of respondent	Organization	Part of SWMI on which the comment refers	Comment/remark <sup>1</sup>	Accepted	Change in the paper Yes/No	Explanation/Justification
1	Tarik Kupusović	Institut za hidrotehniku d. d. Sarajevo	1 and others	<b>Comment 1:</b> Izvrstan dokument – vrhunski profesionalno napravljen; sve čestitke Sekretarijatu Savske komisije!			
2				<p><b>Comment 2:</b> Kao što je poznato, voda je neophodna i za život i kao resurs za ekonomiju. Okvirna direktiva o vodama upućuje na zaštitu vodnih resursa, radi omogućavanja njihovog održivog korištenja.</p> <p>Eurostat objavljuje Indekse korištenja voda (odnos ukupno zahvaćenih voda – isključujući „in situ“ hidro-energiju, prema prosječno godišnje raspoloživim vodama, u %). Od ukupno 33 obuhvaćene zemlje, najviši ovaj indeks imaju:</p> <ol style="list-style-type: none"> <li>1. Kipar 79.6</li> <li>2. Malta 58.1</li> <li>3. Španija 33.6</li> <li>4. Belgija 30.1</li> <li>5. Turska 21.6</li> <li>6. Poljska 17.8</li> <li>7. Njemačka 17.6</li> <li>8. Francuska 16.1</li> </ol> <p>Granične vrijednosti ovog indeksa su:</p> <ul style="list-style-type: none"> <li>• Do 20 % - slivno područje nije pod pritiskom od zahvatanja voda;</li> <li>• Od 20 do 40 % - region je siromašan vodom; i</li> </ul>	Yes	No	<p><b>Response:</b></p> <p>In principle, we agree with the comment. This issue is very important but it goes beyond of the purpose of the document. EU WFD is not focused to the long term water management planning but to the effects of the particular activities to the water quality and the prevention of negative impacts of such activities. Leaving the old concept of “vodoprivredne osnove” and moving to joint planning as required in the River Basin Management Plans the “tool” for long term water management has been lost in general. This fact should be taken into account and it is recommended to inform the Sava Commission taking into account its mandate. It is recommended that development issues of water use should be included in the 2<sup>nd</sup> Sava RBM Plan but its basic aims should be considered. Sava Commission has adopted a Joint Plan of Actions for the Sava River Basin (JPA-Bled, 2017), which represents a milestone in integrated water management and socioeconomic development of</p>

<sup>1</sup> Comment/remark are in language as received and not translated into English

Nr.	Name of respondent	Organization	Part of SWMI on which the comment refers	Comment/remark <sup>1</sup>	Accepted	Change in the paper Yes/No	Explanation/Justification
				<p>• Preko 40 % - postoji ozbiljan nedostatak vode. Za Savske zemlje je:</p> <ol style="list-style-type: none"> <li>1. Slovenija 3.6</li> <li>2. Srbija 2.4</li> <li>3. Hrvatska 0.6</li> </ol> <p>dok za Bosnu i Hercegovinu i Crnu Goru nema podataka. Za dio sliva Save u BiH, iz prijedloga Planova upravljanja po entitetima, da se izračunati da Indeks korištenja voda iznosi 0.6 %. Očigledno je korištenje voda u Savskim zemljama višestruko manje nego što bi moglo i trebalo biti. Vode nam znači bespovratno otiču, a pri tome svi živimo u krizi i, barem većina, u siromaštvu. Jeste da se u dokumentu kaže „Po definiciji, SWMIs su pritisci na vodni okoliš koji mogu ugroziti dostizanje okolišnih ciljeva“, te da je „u prvoj Analizi (iz 2009.) zaključeno da se ne može očekivati da korištenje voda postane značajan pritisak do 2015.“ I tako, o tom ključnom elementu održivog upravljanja vodama nema više ni riječi! A u uvodu samog dokumenta se navodi: „Hrvatska, Bosna i Hercegovina, Srbija i Slovenija su potpisale Okvirni sporazum o riječnom bazenu Save da ostvare ... sistem za održivo upravljanje vodama“.</p> <p>U EU dokumentima za primjenu WFD (npr. CIS for WFD 11), kaže se: „Cilj je procijeniti koliko su vode važne za ekonomski i društveni razvoj u riječnom bazenu, te ... otvoriti put za mobilizaciju</p>			<p>the region. In the JPA the priority issues and relevant mid-term activities in the Sava river Basin are defined including strengthening planning and development of the basin aiming to accelerate economic integration and investments in the basin.</p>

Nr.	Name of respondent	Organization	Part of SWMI on which the comment refers	Comment/remark <sup>1</sup>	Accepted	Change in the paper Yes/No	Explanation/Justification
				<p>javnosti“, a zatim i „Stavljanje okolišnih potreba iznad ljudskih dovida do neodrživog fiskalnog okvira za sektor voda“! Nadalje „Vode su na prvom mjestu nešto što se koristi, tako da se kroz upravljanje vodama planiraju i omogućavaju funkcije vodosnabdijevanja stanovništva i privrede, plovidbe i drugog. Istovremeno, upravljanje treba da vode sačuva od daljnjeg pogoršavanja, da bi se osigurala trajnost korištenja voda.“</p> <p>Postavlja se i pitanje ko će i kako platiti izgradnju, održavanje i funkcionisanje silnih sistema za prečišćavanje otpadnih voda iz gradova i manjih aglomeracija? „Neodrživi fiskalni okvir“ sektora voda sigurno neće moći!</p> <p>Dakle, nema ništa sporno; <b>predlažem da se u ovom dokumentu naznači, a kasnije, kod izrade Drugog Plana upravljanja, detaljno razmotre razvojna pitanja korištenja voda.</b> Gore spomenuti indeks za neke uspješnije zemlje EU je: Slovačka 4.8 %, Češka 10,9 %, Estonija 14.6 % itd. Dakle, vode u bazenu Save se kao obnovljivi i vlastiti resurs 10 do 20 puta sveukupno manje iskorištavaju, nego je to u uspješnijim zemljama u Evropi! Nešto se sigurno može i mora uraditi. Neko mora početi promovisati promociju upotrebe voda, da bi sektor voda bio u stanju ispuniti očekivanja od njega za zaštitu voda, te posebno zaštitu od voda, što ovdje nije u fokusu..</p>			

Nr.	Name of respondent	Organization	Part of SWMI on which the comment refers	Comment/remark <sup>1</sup>	Accepted	Change in the paper Yes/No	Explanation/Justification
3				<b>Comment3:</b> Zaostalo je nekoliko tehničkih nedostataka: Neke skraćenice (npr. WM, AWB, HMWB, Fed BA, Nt, Pt, ISI, SedNet, PEG) nisu definirane;	Yes	Yes	√
4				<b>Comment4:</b> „... only two are the EU Member States (EU MS) while the others are in different stages of the accession process.“ Misli li se i na Crnu Goru? Ako ne, pa i ako da, „only“ je viška;	Yes	Yes	√
5				<b>Comment5:</b> . O „Slavonian oak“ (hrast) napisano je 18 redova – zaista previše, nakon već napisanih 6 o „lowland riparian forests“, što je sasvim dovoljno.	Yes	Yes	√
6	Blaž Pišek	SAVSKE ELEKTRARNE LJUBLJANA d.o.o.		<b>Comment1:</b> After reviewing the Interim Overview of the Significant Water Management Issues (SWMIs) in the Sava River Basin, we find that the document covers a sufficiently significant water management issues. Regarding the fact that the document will be the basis in the process of preparing the second plan managed water (WMP) in the Sava River Basin, it might be appropriate to summarize the practical experiences of the implementation of national WMP's in the document. Slovenia has prepared a draft Water Management Plan for the Danube River and the Adriatic Sea Basins for the period 2015 - 2021 (RBM 2). In the draft RBM 2 the basic measures under the code HM (basic measures - hydromorphological pressure) will be provided. This refer to a measure HM1a (Measures related	Yes	No	This is a comment, not necessary to be included in SWMI document.

Nr.	Name of respondent	Organization	Part of SWMI on which the comment refers	Comment/remark <sup>1</sup>	Accepted	Change in the paper Yes/No	Explanation/Justification
				to achieving good ecological potential in the production of electricity at large hydro power plants), which has been defined in the RBM 1 (2009-2015) and the measure HM1b (Preparation of detailed assessment of the implementation of measures linked to the achievement of good ecological potential in the production of electricity at large hydro power plants and, if necessary, preparation of detailed guidelines for their implementation), which is a new measure. Unfortunately the operational difficulties or delays in the operational implementation of the measure HM1a have been detected. They will be possibly resolved in the context of HM1b, which is intended to address the current situation.			
7			3.1.4	<b>Comment 2:</b> This footnote would be included in section 3.1.4 Hydromorphological Alterations, for example. at the end of the paragraph: In Slovenia by 2015, two fish passes - on the HPP Krško and HPP Arto Blanca on the Sava River were constructed. One fish pass was reconstructed - on the Krško dam (at nuclear power plant). In the 1st Sava RBMP it was also foreseen that fish aid will be built on the HPP Boštanj, while for HPP Mavčiče and HPP Vrhovo (Sava River, Slovenia) it was foreseen that interruptions will be equipped with the “fish catch and transport” facility. These measures are in the initial phase of project documentation	Yes	Yes	<b>New text added:</b> In Slovenia by 2015, two fish passes - on the HPP Krško and HPP Arto Blanca on the Sava River were constructed. One fish pass was reconstructed - on the Krško dam (at nuclear power plant). In the 1st Sava RBMP it was also foreseen that fish aid will be built on the HPP Boštanj, while for HPP Mavčiče and HPP Vrhovo (Sava River, Slovenia) it was foreseen that interruptions will be equipped with the “fish catch and transport” facility. However, since the beginning of operation of these two HPPs the fish hatcheries have been built which are managed by the local fishing families. These measures will be

Nr.	Name of respondent	Organization	Part of SWMI on which the comment refers	Comment/remark <sup>1</sup>	Accepted	Change in the paper Yes/No	Explanation/Justification
				preparation Maybe it should be explained that the measures which are now in the "initial phase of project documentation preparation" will be revised. For your information, at HPP Mavčiče and Vrhovo, where no fish passages exist, since the beginning of operation the fish hatcheries have been built which are managed by the local fishing families.			furtherly revised.
8	Irma Popović Dujmović	WWF Adria	3.1.4 Page 12-13	<b>Comment 1:</b> First paragraph, sentence "Continuity interruptions refer to weirs, dams and other lateral objects that enable fish migration and sediment transport, while morphological alterations refer to river engineering works (i.e. strengthening and deepening of rivers, building of embankments, river bank reinforcement etc.) due to different driving forces." We believe that the verb ENABLE is erroneously used in this context; namely, structures mentioned in the sentence DISABLE continuity (fish migration and sediment transport).	Yes	Yes	√
9				<b>Comment 2:</b> When citing measures identified in the 1st Sava RBMP, it is mentioned that for Croatia and Slovenia (as EU member states) definition of measures addressing both hydrological and morphological alterations "is foreseen by 2015 with the possibility to extend the deadline through mechanism of exemptions	Yes	Yes	<b>Response:</b> In <b>Slovenia</b> objectives for 5 surface water bodies have been extended to the year 2027 in regard to hydrological and/or morphological alterations. In <b>Croatia</b> objectives for all surface water bodies have been extended to the year 2027 in regard to hydrological and/or morphological alterations.

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				till 2021/2027". As the year 2015 passed, the countries should already know if and which exemptions they were granted, and those should be clearly stated in the section explaining the work done since adoption of 1st Sava RBMP. We feel that this would add clarity to understanding the current status, as well as enable a more informed decision making with regards to possible achievements for the 2nd Sava RBMP.			Unsatisfactory status in terms of hydromorphological indicators has not been confirmed through biological monitoring.
10				<b>Comment3:</b> Finally, when discussing Future Infrastructure Projects, in addition to ICPDR line of work, it would be important to consider the national RBMPs of Croatia and Slovenia. As per WFD, these two EU member states are obliged to adopt 2nd RBMP (Croatia did so in July), which also should provide an inventory of future infrastructure projects, and thus should be used as references for Sava RBMP.	Yes	No	<b>Response:</b> Slovenia second RBMP do not include inventory of future infrastructure projects. WFD does not require providing inventory of future infrastructure projects within RBMPs. Future development has been taken into account in risk assessment analysis.  Future infrastructure projects from the national plans which are important for the Sava River Basin will be part of 2 <sup>nd</sup> SRBMP.
11	Goran Sekulić	World Organization for Nature	3.1.1. Page 7	<b>Comment 1:</b> The draft National Water Pollution Protection Plan for Serbia, mentioned in the text, has not been presented to the public and the status of the draft is unknown. The plan is defined by the Law on waters which is under revision. That means that the plan can be developed and implemented after adoption of the amendments. It is important to emphasize	Yes	Yes	<b>Response:</b> Comment is correct. In the paragraph regarding Serbia on the page 7 the sentence "Adoption of both documents is expected in early 2016" is replaced with the sentence "Adoption of both documents is expected in 2017".



Nr.	Name of respondent	Organization	Part of SWMI on which the comment refers	Comment/remark <sup>1</sup>	Accepted	Change in the paper Yes/No	Explanation/Justification
				that the time lag in adoption of relevant documents (Law, Strategy and NRBMP) in Serbia represent a significant obstacle for further improvements in water management. As stated in the document, the adoption was expected in early 2016, but still there are no signs of progress on this issue.			
12			3.1.2. Page 9	<b>Comment2:</b> The term “vulnerable nutrient zones” have been introduced in the amendments on the Law on waters for the first time in Serbia. However, the amendments are still not adopted what is preventing further development of NVZ. Due to that Serbia still doesn't have adequate legal framework for implementation of measures on nutrient pollution.	Yes	Yes	<b>Response:</b> Comment is correct. On the page 10 at the end of first sentence in the paragraph regarding Serbia it is necessary to add “, although the amendments on the Law on water are still not adopted what is preventing further development of NVZ”.
13			3.1.2. Page 9	<b>Comment3:</b> The regulation on phosphorous ban mentioned for Serbia, actually allows trade of detergents with phosphorous content higher than 0,5 g for a standard laundry cycle until the end of 2016 (Regulation on detergents, Official Gazette of the Republic of Serbia no 25/2015, article 22, paragraph 4).	Yes	Yes	<b>Response:</b> Comment is correct. On page 10 at the end of the paragraph mentioning Serbia and above the “2015” the footnote should be added as follows: “Regulation on detergents, Official Gazette of the Republic of Serbia no 25/2015, article 22, paragraph 4 allows trade of detergents with phosphorous content higher than 0,5 g for a standard laundry cycle until the end of 2016.”
14			3.1.4 Page 14	<b>Comment4:</b> Obviously, the measures identified in the 1st Sava RBMP were not adequately developed and specified, what resulted in the weak implementation (only SLO showed some	Yes	Yes	√

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				progress). <b><i>It should be stressed out that specific measures should be defined in the next planning cycle with emphasize on ecosystem restoration and natural based measures.</i></b> The next plan must show more commitment of the Sava countries on this issue.			
15			3.1.4 Page 14	<b>Comment5:</b> More decisive and more comprehensive consideration of future HPP projects, in particular small HPP is needed. The next RBMP should propose specific measures for achieving sustainable planning of HPP projects in the region (particularly affected is the Drina river sub-basin).	Yes	No	<b>Response:</b> The plan has its scale of consideration and the cumulative effects of small HPPs would be taken into account in line with the ICPDR document “Sustainable Hydropower Development in the Danube Basin- Guiding Principles” (2013).
16			4.1 Page 16	<b>Comment 6:</b> Intensive and loosely controlled sediment extraction in Serbia is still representing significant issue for water management and environmental protection in general. The new Law on waters (still in adoption) proposes some measures for solving this issues, however these national measures should be better supported through the next RBMP. Although, the sediment extraction has been adequately regulated in some Sava countries it still should be considered as a regionally significant issue (regional market drivers, trans-boundary effects).	No	No	<b>Response:</b> There is still not enough data that the sediment should be considered SWMI. According to the Protocol on Sediment Management which entered into force on October 8, 2017 the Sediment Management Plan is planned to be developed and other activities regarding sediment management implemented.
17	Tibor Mikuška	Croatian Society for Bird and Nature	General	<b>Comment 1:</b> On behalf of the Croatian Society for Birds and Nature Protection we are providing comments on the ISRBC document “Significant Water Management Issues in the Sava River	No	No	<b>Response:</b> The SWMIs and other important issues as “potential SWMIs” have been defined through the process of intensive consultation during

Nr.	Name of respondent	Organization	Part of SWMI on which the comment refers	Comment/remark <sup>1</sup>	Accepted	Change in the paper Yes/No	Explanation/Justification
		Protection		<p>Basin – Interim overview (version: July 2016) that entered public participation process during late July 2016.</p> <p>The interim overview should, as stated in the call for public participation:</p> <ol style="list-style-type: none"> <li>1. provide an outline of the 2nd Sava RBMP structured according to the significant water management issues and the other issues of potential relevance for the whole basin</li> <li>2. It should provide an overview of the SWMIs which need to be addressed in the 2nd Sava RBMP taking into account the progress of implementation of the Programme of Measures identified in the 1st Sava RBM Plan</li> <li>3. It should also reflect new data and knowledge on other issues which might be included in the process of development of the 2nd Sava RBMP if they will be recognized as SWMIs on the basin-wide scale.</li> </ol> <p>In general, the presented document does not meet any of three desired and above stated goals. The descriptions of the SWMIs are overallly general, lacking hard facts, new and available data and proper recognition of the issues. <b>Major SMWIs are completely missing (see below) or they are not recognized at all</b></p>			development of the 1 <sup>st</sup> SRBMP. In general during the determination of SWMIs for the Sava River Basin the regional character should be taken into account. The issues without transboundary character or issues not approved yet could not be considered. This is not kept in mind in this comment.
18			2.2	<b>Comment 2:</b> In the document it is stated “Since the visions represent the principle objectives for the Sava RB with a long-term perspective, <i>no</i>	No	No	<b>Response:</b> The statement in the document is correct and there is no need for its modification. The visions

Nr.	Name of respondent	Organization	Part of SWMI on which the comment refers	Comment/remark <sup>1</sup>	Accepted	Change in the paper Yes/No	Explanation/Justification
				<p><b>updates of the visions are foreseen</b> for the preparation of the 2nd Sava RBMP.”</p> <p><b>From the integrative planning process point of view, such a decision is completely wrong.</b> It is well known that every proper planning process includes decision making/planning, execution, monitoring and adaptation/modification of the further planning/execution of measures that is solely based on the monitoring results. This adaptation /modification is not only related to the program of measures, but applies also for the overall visions that should reflect current state of the issue. Some visions should be adapted/modified based on the issues that were not envisaged during the first planning phase or that appeared during the execution phase. Concerning the 1st Sava River Basin Management Plan, some SWMIs were not recognized at all, thus no visions were ever drafted.</p> <p><b>In conclusion, both visions and management objectives should be modified/adapted according to the results of monitoring and new available data.</b></p>			<p>are based on common values and describe the principle objectives for the Sava River Basin. Since the visions represent the principle objectives for the Sava River Basin with a long-term perspective, no updates of the visions are foreseen in the process of 2nd Sava RBMP development.</p>
19			3.1.1	<p><b>Comment 3: This chapter needs further update with new available data.</b> For example, for Croatia the whole paragraph is short and missing important updates that are readily available in the new draft Croatian River Basin Management Plan 2016-2021.</p>	Yes	No	<p><b>Response:</b> Other sewer systems and waste water treatment plants are in different phases of implementation, most of them are in phase of design. The final date of construction is expected in 2018. This information will be part of 2<sup>nd</sup> Sava RBMP.</p>

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20			3.1.3	<b>Comment 4:</b> The vision for the hazardous substances should be updated as following: <i>“Vision for hazardous substances pollution is no emission of hazardous substances into the waters of Sava River Basin and no risk or threat to human health and the aquatic ecosystems in the Sava River Basin.”</i>	No	No	<b>Response:</b> No need for update
21			3.1.4	<b>Comment 5: Hydromorphological alterations in the Sava River Basin, concerning their scale and impact, are the key SWMI. Thus, the whole chapter needs to be rewritten because it does not contain any data that would clearly show the significance of the issue.</b> For example, the document correctly recognize that the hydropower is the main driving force in the SRB causing hydrological alterations. However, this is not backed up with data. In fact, there are over <b>2700 HPP planned projects</b> in the whole Western Balkan region, with astonishing 582 HPPs planned in the Sava river Basin only. With 231 existing hydropower plants and 11 currently under construction, this dam building craze and “dam tsunami” threatens the whole river system on a river basin scale (Map enclosed). Hydropower schemes change the natural flow regime of the river, reducing flow velocity and altering the sediment transport balance. <b>Interrupted sediment transport causes erosion</b>	No	No	<b>Response 5-1:</b> HPPs – Document is based on official and verified information from the countries for the purpose of this planning cycle.  <b>Response 5-2:</b> Slovenia does not have information regarding this comment.

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				<p><i>and riverbed degradation downstream, e.g., dams on Sava in Slovenia caused river bed degradation at Zagreb up to 6 meters in less than 40 years.</i> Dams drastically alter habitats in impoundments and hence the respective biota, as lotic species are replaced by lentic species. For example, The backwater influence of Danube Iron Gate I influences the water levels on the Sava River for about 100 rkm upstream from its mouth. Construction of dams disrupt fish migration. The dams planned for the major tributaries would convert nearly all of these rivers into hydropower chains, making a very great impact even if no new dams were built on the Sava itself.</p> <p><b><i>Planned large navigation projects on the Sava River are second major cause of hydrological alterations.</i></b> Present designated river navigation classes (IV and V) are way above the natural navigation conditions (III and IV) that are bound by physical characteristic of the river. <b><i>Goals of the navigation projects to upgrade the navigation classes from Belgrade to Sisak, supported by ISRBC, cannot be achieved without complete degradation of the existing hydromorphological and biological status of the river along the 600 km long course (Map enclosed).</i></b></p>	No	No	<p><b>Response 5.3:</b></p> <ul style="list-style-type: none"> <li>• Present designated river navigation classes (IV and V) are way above the natural navigation conditions (III and IV).....”</li> </ul> <p>1. Just before 1991, the dimensions of the fairway for the most part responded classes V and IV, and present dimensions are the result of many years of neglect and lack of the regular maintenance of the fairway so that it is unclear from where the information that the natural navigation conditions are class III and IV.</p> <p>2. The feasibility study showed that the most cost-effective solution is to restore the fairway to class Va in the entire length of the waterway but</p>

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							<p>all members of the Sava Commission, respecting the natural characteristics of the river and environmental requirements, decided that the fairway up to Brcko shall be designed to class Va, and further upstream to class IV so that the planned restoration of the fairway mainly corresponds to the situation before 1991.</p> <p>3. Despite the complete neglect of regular maintenance of the fairway it is still in a length of 326.7 rkm classified in classes IV and Va.</p> <ul style="list-style-type: none"> <li>• “Goals of the navigation projects to upgrade the navigation classes from Belgrade to Sisak, supported by ISRBC, cannot be achieved without complete degradation of the existing hydromorphological and biological status of the river along the 600 km long course”</li> </ul> <p>1. During the development of the complete project documentation all applicable national and international regulations regarding the environmental protection were respected and there is no any document supporting the aforesaid statement.</p> <p>2. Despite all of the abovementioned under 1. ISRBC and our Member States are ready to carry out additional studies in accordance with the requirements of non-governmental environmental organizations and together with them to find the most optimal solutions for the restoration of the fairway.</p>

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				<p>Above <i>includes the Sava-Danube canal that is being built in Croatia under the false label of irrigation project.</i> Luckily for the Sava itself, recent negative economic trends and complete collapse of the transport of goods along the Sava<sup>6</sup> put all these projects on hold. However, this issue is still pending and future Sava RBMP should adequately reflect these facts</p> <p>Third main source of <i>hydrological alterations are dredging and exploitation of sediments from Sava and its tributaries</i> (see comments under chapter 4.1.). The scale of this problem is so large</p>	No	No	<ul style="list-style-type: none"> <li>• “Luckily for the Sava itself, recent negative economic trends and complete collapse of the transport of goods along the Sava.....”</li> </ul> <p>1. Complete collapse of transport on the Sava River in spite of all conditions for it (total lack of maintenance of the fairway), has not yet occurred (2013 transshipment at ports on the Sava was approx. 650,000 t), and the main reason that transport is not more intense is only a very poor state of the fairway and there are periods of a complete suspension of navigation which is unacceptable for carriers and owners of goods.</p> <p>2. There is the interest for the transport of goods and passengers (cruise tourism) but there is no increased transportation without restoration of the fairway</p> <p><b>Response 5-4:</b> Inlet channel for irrigation of Biđ-Bosut field is foreseen in the same route as multipurpose channel Danube-Sava. Its purpose is irrigation and breeding of low waters for hydrographic system of Biđ-Bosut field which could be recognized from its dimensions.</p> <p><b>Response 5-5:</b> There is still not enough data and information that this should be considered as SWMI. The development of Plan on Sediment Management</p>



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				<p>that is cannot be considered as “other pressures”, as was in the first management plan (see below)</p> <p><b>Planned flood protection projects represent further SWMI and concern for the future hydromorphological alterations.</b> The area of land connected to the Sava river and has already shrunk by 77%, from 8,943 km<sup>2</sup> to 2,067 km<sup>2</sup>, but the extent of loss varies widely at different points. In the Lonjsko polje reach, it is only about 40%, but in the lower Sava in Croatia and Bosnia &amp; Herzegovina and in Serbia (with the exception of the Bosut forest, Drina confluences and Obedska Bara), it is up to 85%. Consequences of such <b>old-fashioned flood protection system</b> were, unfortunately, brutally evident during the May 2014 flood event on lower Sava with 60 human deaths and estimated 3 billion Euro damages in Croatia, Serbia and Bosnia and Herzegovina.</p> <p>However, little or nothing has been learned from past flood events by the respective national water management authorities. The primary reaction of all affected countries to the floods of 2014 was to invest in the reinforcement of existing dikes. <b>Nowhere have dikes been placed further from the river, and nowhere are there any plans to reconnect former floodplains with</b></p>	No	No	<p>and other activities are foreseen to be implemented according to the Protocol on Sediment Management which entered in force on October 8, 2017.</p> <p><b>Response 5.6:</b> Traditional flood management is a long-term praxis and has been implemented in the Sava riparian countries according to valid regulations. New concept of flood risk management is implemented taking into account the EU acquis. It should be mentioned that despite of “traditional” flood management the technical solutions of flood protection for example in Srednje posavlje (Lonjsko polje, Mokro polje) are based on the principle “More space for the rivers” and “in coordination with the Nature” and are in function for many years. This approve that despite the criticism, the green solutions of flood protection are common praxis already implemented in the Sava River Basin. Analysis of so cold “green” solutions is foreseen to be part of consideration and solutions in planning documents of the Sava Commission (e.g. Programme for development of Sava FRMP...).</p>

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				<p><i>the river, even though there are many large areas suited to the implementation of such concepts.</i> Millions of taxpayers money are being “invested” into projects that aim for either existing dike reconstructions or, even worse, new dike construction that would further cause disconnection of the floodplains from the rivers.</p>			
				<p>Finally, <i>the ultimate SWMI or “mother of all SWMIs”</i> should be mentioned and tackled in the next Sava RBMP – all respective water management authorities (both on the ministerial as well as state company level) across the Sava River Basin are continuously promoting <i>old-fashioned and out-dated river management concepts</i> that are based on the 19th century river regulation ideas. Also, in some cases via so-called “twinning” projects and with international help, an attempt was made to increase the knowledge and capacity of water management authorities, little progress is made on the field. The best example is the <i>new long-term construction plan produced by Croatian Waters and endorsed by Croatian government.</i></p> <p>If all above mentioned projects would be realized by the respective water management authorities, status of the Sava river would degrade considerably – severely modified and extensively modified stretches would increase from current 6% to shocking 44% and 36%, respectively<sup>10</sup>. In</p>	No	No	<p><b>Response 5.7</b> Comment is not relevant for the SWMI document.</p>

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				<p>other words, from today 12%, Sava river would plunge into 80% of stretch featuring classes 4 and 5.</p> <p>Measures identified in the 1st Sava RBMP to solve this problem are essentially not adequate to reach the goals. <b>For example, it is stated that two fish passes were constructed in Slovenia. However, the fact is that none of them a properly working and no hard and scientifically based data exists to prove their value.</b> In conclusion, proper measures should be identified and paragraph completely rewritten in order to include and put river and floodplain restoration measures into the spotlight. Excellent example and source of needed information represents the "Sava White Book" that has been prepared by Fluvius and published by EuroNatur and Riverwatch NGOs within the framework of "Save the BlueHearth of Europe" campaign.</p>			
22			3.2.1	<b>Comment 6: Vision needs to include quantity of groundwater resources, not only quality.</b>	Yes	Yes	<p><b>Response:</b> The vision for groundwater quantity is that water use is appropriately balanced and does not exceed the available groundwater resources in the Sava River Basin, taking into consideration the potential impacts of future climate change.</p>
23			4.1	<b>Comment 7:</b> This chapter deserves promotion into the main SWMIs concerning negative impacts in the Sava River Basin. Based on the available data, over 200 km (25%) of the Sava	No	No	<p><b>Response:</b> No official information. Data and information will be collected in accordance with the Protocol on Sediment</p>

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				<p>river and its lower tributaries (Kupa, Una, Vrbas, Bosna, Drina) are affected by excessive dredging. Recent study showed that the total annual quantity of material dredged is 950,000 m<sup>3</sup> from the Sava and 1.29 million m<sup>3</sup> from its tributaries. The current dredging rates are 10 times more than natural transport for Sava and 4 times more for the tributaries. The whole licensing system for dredging is prime source of corruptive behavior, and large quantities are taken from the system completely illegally.</p> <p>Four key issues for sediment management should be tackled and solved with the new SRB Management plan:</p> <ol style="list-style-type: none"> <li>1: Sediment quantity and hydromorphology - sediment balance namely bedload (gravel) and suspended load (sand and silt), channel and planform building morphological behavior, covered by hydromorphological assessment;</li> <li>2: Sediment quality and remobilization - closely linked to sediment flux and grain sizes, with relevance for the Sava downstream of industrial sites and along some tributaries;</li> <li>3: Sediment as habitat and river ecology - as a component of aquatic systems and ecological status after WFD, e.g. for macroinvertebrates, interstitial organism</li> </ol>			Management entering into force on October 8, 2017.

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				and (young) fish); and 4: Dredged material management - the core topic of SWMIs since its purposes are commercial, navigation and flood management			
24			4.2;4.3; 4.4	<b>Comment 8:</b> All three chapters need further improvement and substance	Yes	No	<b>Response:</b> These issues will be further developed within 2 <sup>nd</sup> Sava RBMP.
25			4.5	<b>Comment 9:</b> Protection of biodiversity, hydromorphological (e.g., meandering, flow) and ecological processes along the Sava River Basin is another significant aspect of the future management plan, that was generally ignored during the preparation of the 1st Sava RBMP. However, provisions of the EU Water Framework Directive clearly call for the achievement of good ecological status and ecological potential, no further deterioration, as well as protection of waters and water dependent ecosystems. Important water dependent habitats and ecosystems cover 250,000 ha, or 29% of the entire Sava floodplain and its lower tributaries <sup>12</sup> . These include 1.293 ha of gravel/sand bars and other pioneer stands, 4.744 ha of oxbows and floodplain swamps, 31.629 ha of softwood forest, 141.580 ha of hardwood forests (out of that over 63.000 ha are in the active floodplain) and 55.159 ha of wet grasslands <sup>13</sup> . These place the Sava River in the ecologically most important riparian landscapes across Europe.	No	No	<b>Response:</b> Protection of biodiversity, hydromorphological (e.g., meandering, flow) and ecological processes are significant aspects of the future management Plan, but they are not SWMIs. By definition, the SWMIs are the pressures acting on the water environment that they are considered as putting the ability to achieve the environmental objectives of the WFD most at risk.

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				<p>Such values are reflected through the size and distribution of the protected areas: 36% of the total Sava floodplain and 64% of the Sava River course is already laying in the protected areas. With partial overlap, these areas are as follows:</p> <p>1 National park: 16 ha (only Sava Bohinjka headwater as part of Triglav national park)</p> <p>4 Ramsar sites: 65,720 ha</p> <p>31 Natura 2000 areas: 222,656 ha (including Lonjsko polje Ramsar site with 50,521 ha)</p> <p>12 strictly protected areas: 33,298 ha (including Emerald proposal in Bosnia and Herzegovina with some 10,000 ha)</p> <p>41 other protected areas cover the remaining area</p> <p><b>Ensuring the long-term protection of these sites makes another SWMI that needs proper attention in the 2nd Sava RBMP.</b></p>			
26	Edith HOEDL	ICPDR	General	<p><b>Comment 1:</b> We would like to sincerely congratulate you for the draft document and interim overview of significant water management issues in the Sava River Basin as of July 2016. The concise document provides a clear and well-structured overview about the issues identified as SWMIs and "candidate" SWMIS and we wish you all the best for the finalization of the document.</p>			