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Republic of Serbia

Ministry of Construction, Transport and Infrastructure

Directorate for Inland Waterways

Francuska 9, 11000 Belgrade

Zagreb, 5th of November 2019

Subject: Support letter for implementation of compensation measure within the project "Supervision and Environmental Monitoring of River Training and Dredging Works on Critical Sectors on the Danube River"

To whom it may concern,

WWF, as one of the NGOs working on inland navigation projects in the Danube Basin, clearly commits to the "Joint Statement on Development of Inland Navigation and Environmental Protection in the Danube River Basin" and is not opposing navigation if

- interdisciplinary planning teams involving key stakeholders are established to facilitate the integrated planning approach,
- a case-by-case approach is applied which considers both the ecological requirements for each river section and the basin-wide scale and the strategic requirements of Inland Waterway Transport at the basin-wide scale when deciding on adequate fairway width and depth,
- the "working with nature" principle prevails wherever possible through implementation of measures according to given natural rivertype-specific, morphodynamic processes following the principle of minimum or temporary engineering intervention,
- regulation structures are being designed in an integrated fashion, equally regarding hydraulic, morphological and ecological criteria,
- measures are being implemented in an adaptive form,
- the potential for river restoration and side channel reconnection is fully exploited as part of the integrated plan,
- flood water levels are not exacerbated or, ideally, are reduced, and
- environmental legislation is respected (including non-deterioration clause and an improvement obligation); this refers in particular to the Water Framework Directive and the Birds and Habitats Directives, which apply to EU countries but increasingly also in accession countries, (WWF DCP, May 2018).

WWF participated since 2011 in the development and execution of this project. WWF is considering this project as a very good example how integrated planning and execution of inland waterway projects should be carried out. Openness for innovative solutions and a stringent management were some key aspects to proceed successfully through a complex process.



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The establishment of a stakeholder forum right from the beginning was another success factor. Regular and continuous participation options were offered to all interested parties, high transparency of project development and all data processed was and is provided.

With the planned and partly already implemented structural measures appropriate monitoring of the effects, from navigational as well as ecological point of view, are crucial. WWF and all other stakeholder forum members are carefully observing performance and outcomes of the monitoring.

The Danube sector in Serbia is already a significantly modified water body by rectification, bank reinforcements and flood protection dykes despite the visible setting of dynamic morphological processes, existence of still highly valuable habitats and a good status of river type specific biodiversity with numerous endangered species.

WWF is convinced that such structural interventions do have an impact on ecological features although it is not easy to monitor effects in such huge river systems, especially not short-term. Most of these interventions will support already observed negative long-term developments, e.g. siltation of sidearms, loss of dynamic islands in the riverbed by overgrowing vegetation especially in groyne fields and loss of cut-off banks as well dynamic point bars. Some of these unfavourable effects have been considered in the design and execution phase, i.e. by a modern mitigation approach.

Nevertheless, some negative effects are unavoidable and therefore WWF recommends that compensation measures should be considered as indispensable and wherever it is feasible. These should be always linked to river ecosystem where the project impacts happens and not situated outside of the Danube river context.

The proposed compensation measures, prepared by the Institute for Nature Conservation of Vojvodina Province, i.e. the revitalization of a side arm at the critical sector of Futog, deserves full support by WWF. This compensation measure represents the necessary approach to mitigate partly unfavourable long-term effects by the existing river training structures developed for navigation purposes in this Danube River sector and is in general considered as state-of-the-art methodology by WWF.

In summary, WWF as a member of the stakeholder forum, welcomes this proposed compensation measure. We offer also our technical and other capacity to help with the design, approval and implementation within the project time, also to secure a minimum of monitoring of the compensation measure itself in the framework of the on-going supervision and services contract. This might be another cornerstone in the step-by-step process and learning from the river principle agreed in the 'Joint Statement on Guiding Principles for the Development of Inland Navigation and Environmental Protection in the Danube River Basin' for IWT projects.

Yours faithfully,

WWF Adria

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