



## Sava River Position Paper

Prepared by EuroNatur

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### Introduction

EuroNatur has been dedicated to nature conservation and the sustainable use of natural resources in the Sava River Basin for the last 25 years. In our role as an official observer of the Sava Commission EuroNatur has been following the processes of the Commission and the ongoing development of the Sava River Basin Management Plan with attention. Hereby we would like to comment on some questions related to further infrastructural development and regulation of the Sava River, which are urgent and alarming from our point of view. Moreover, we are offering recommendations and suggestions regarding these issues.

### Comments on the focus of the Sava Commission (ISRBC)

The International Sava River Basin Commission (ISRBC) has been established for the purpose of realization of the following goals:

- I. Establishment of an international regime of navigation on the Sava River**
- II. Establishment of sustainable water management**
- III. Undertaking of measures to prevent or limit hazards**

Although the second goal includes the availability of “water in sufficient quantity and of appropriate quality for the preservation, protection and improvement of aquatic eco-systems (including flora and fauna and eco-systems of natural ponds and wetlands)” no working group was implemented that is adequately dealing with such issues as the monitoring and protection of the Sava River and connected aquatic ecosystems.

Most publications that were elaborated by the ISRBC so far miss a clear reference to biodiversity and nature conservation topics, but deal with navigation and water management issues. Even a project for nautical tourism and a brochure about a bridge over the Sava River are being produced<sup>1</sup>. On the other hand we miss publications entirely demonstrating the natural values and protected areas along the Sava River so far (compare Chapter 4 in the Sava River Basin Management Plan and Background Paper No. 8: Protected Areas in the Sava River Basin<sup>2</sup>).

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<sup>1</sup> Master Plan for the Development of the Nautical Tourism in the Sava River Basin available on: [http://www.savacommission.org/project\\_detail/13/1](http://www.savacommission.org/project_detail/13/1)

<sup>2</sup> Both documents available on: <http://www.savacommission.org/srbmp/en/draft>



It is very critical that the ISRBC members do restrict their reflections mainly to the aspects of navigation and water management and that other important sectors, such as biodiversity, the important alluvial forests and the rich cultural heritage of the connected landscapes are not included in their focus.

## **Recommendations**

- (1) Future funding of the ISRBC by the European Commission (EC) should depend on the incorporation of non-economical sectors and goals, such as nature conservation, the ecology of water related habitats and the viability of the lowland forests connected to the Sava into the actual scope of action and into the executive bodies of the ISRBC.
- (2) The work of the ISRBC needs a more integrative structure and all important aspects of water management have to be treated equally. The current situation is that navigation and hydropower dams are being supported by the ISRBC, while restoration projects and alternative transport concepts that could save the unique natural and cultural values of the Sava River continuum are neglected. Even if the activities of the ISRBC are in accordance with the actual Management Plan, the disregard of preservation measures highlighted by the EU Water Framework Directive is not beneficial for the international reputation of the ISRBC and for Croatia as a future member country of the EU, as well.
- (3) To create an administrative institution uniquely dedicated to the above mentioned environmental sectors and management goals and the Natura 2000 guidelines, the European Commission should support the creation of a Sava River Conservation Commission like the one already existing for the Danube Basin. By the institutional separation of economical and infrastructural issues from ecological aspects the ISRBC could more effectively meet its own requirements stated above.

## **Evaluation of the Sava River in terms of navigation**

Officially, the Sava is treated as an international navigation corridor, but actually it is a small appendix of the main European Rhine-Main-Danube traffic corridor which ends in Sisak and does not have any international importance. The present navigation plans of the ISRBC are still influenced by the old vision of building the Danube-Sava-Adria Canal.

In general, navigation is not able to compete with the railway as a transport measure for goods, neither economically, nor environmentally, as the navigation corridor on the Sava from Belgrade to Sisak is much longer than the respective railway corridor. All goods transported on the Sava can be easily transferred on existing and improved railways or pipe systems. In addition an international highway corridor already exists in parallel.

As the Sava shipping corridor is very unreliable and threatened by low water levels and river bed erosion, huge investments would be needed to improve the conditions for regular and increased shipping on the Sava. These riverbed management measures would amplify the river bed erosion and cause huge damages in the connected natural aquatic eco-systems in the long run.



More than 10 years ago, an interesting project was prepared in Croatia with the aim to create a big transport hub connecting the main navigation corridor of the country between Vukovar and Vinkovci with improved road and rail infrastructures. This project is on hold and was never implemented. As the goods, which have to be transported from the Danube River to the Adriatic harbors Rijeka and Ploce have to be transported with other carrier systems, here at the Danube would be the ideal place for the transfer from the shipping corridor to different transport systems.

## Recommendations

The European Commission should not fund any navigation projects at the Sava before the following steps are taken to guarantee the sustainability of such projects and to evaluate the associated environmental impacts:

- (1) The importance of the Sava River for navigation needs to be reassessed by an independent group of experts including NGOs and compared with alternative transport systems such as railways, pipelines and roads.
- (2) A cost benefit analysis is needed to find the environmentally and economically best solution for the transport along the Sava corridor and the north-south connections.
- (3) An alternative traffic and transport system not only for Croatia but for the entire SRB has to be developed and evaluated, which is
  - a. not using the Sava or parts of the river as a navigation corridor and
  - b. based on the existing European transport infrastructure and the planned logistic centre Vukovar-Vinkovci to distribute the goods to the road and railway network in order to preserve the largest European lowland and alluvial forest including the largest closed stands of Penduculate oak (*Quercus robur*) worldwide in the Spacva-Bosut Basin of the Sava lowlands.

## Comments on the Sava River Basin Management Plan (SRB MP)

In 2010, international NGOs as WWF and EuroNatur expressed their criticism on the draft 3.0 of the SRB MP. One of the main reasons was the lack of data concerning natural values of the river and other aquatic eco-systems. Another important point was that the real values of the SRB and especially of the alluvial plain of the Sava River were not included. Since then, the SRB MP has not been modified to meet these environmental requirements.



## Recommendations

The European Commission should demand a review of the SRB MP to fill the following gaps of knowledge:

- a. The unique values of the Sava River Basin need to be identified and described (compare ICPDR, EU Life Project, EuroNatur Comment) in order to create a sophisticated data base for the evaluation of any future projects that may cause an environmental impact on the Sava itself and on connected ecosystems.
  - b. Key problems and potential threats need to be identified, documented and respected in the development of future infrastructure project plans.
  - c. We are currently facing the following problems, which are neglected in the actual Management Plan and we explicitly recommend to include these in a revised version: the calculations of 100 year floods are based on outdated data and a new statistical assessment of the contemporary situation is absolutely needed; minimum waters are decreasing; extreme river bed incision occurs; sediment transport is inhibited resulting in increased erosion downstream; the status of alluvial and lowland forests is critical; hydropower development<sup>3</sup> proceeds uncontrolled among others.
- (2) The current Management plan and activities of the ISRBC should be reviewed with respect to the comments of affected stakeholders. By the number of comments that were raised by the stakeholders during workshops in Sarajevo and Belgrade and by wide attention that was attracted by public hearings that dealt with the topic, we learned that there are different positions that need to be attended and respected. Politically, it is of high importance for the ISRBC to let the public participate in processes and decisions and to give feedback to comments from the public. By neglecting the various public interests, the ISRBC will not support its own national and international recognition.
- (3) The official classification of the Sava River and several tributaries is misleading and should be reviewed. To a large extent, the Sava is classified as a (candidate) heavily modified water body (HMWB), e.g. in HR and BiH. This classification is due to a lack of significant data and investigations that would prove the high ecological value of wide sections of the Sava as already explained above (point 1). Not only in natural riverine systems, but also in HMWBs the implementation of any measures that will further impact the ecological integrity, such as the creation of storage basins and hydropower stations, or the morphological richness of the water body, such as river regulation, inhibition of sediment transport and the sealing of riverbeds, are not in compliance with the guidelines of the EU Water Framework Directive (WFD). The WFD requires the identification and implementation of potential restoration and mitigation measures in natural rivers and also in HMWBs which will improve or at least maintain the current ecological value of the system. With respect to these principles, the present Management Plan does not meet the requirements of the EU environmental legislation.

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<sup>3</sup> During the stakeholder meeting in Sarajevo, the EcaWatch/EuroNatur Assessment of hydropower dams has been shown to the participants. The uncontrolled SRB wide development of hydropower is threatening the sustainable water management and use in the SRB ([http://www.euronatur.org/fileadmin/docs/projekte/Balkan\\_Rivers\\_Blaues\\_Herz\\_Europa/BalkanRiverAssessment29032012web.pdf](http://www.euronatur.org/fileadmin/docs/projekte/Balkan_Rivers_Blaues_Herz_Europa/BalkanRiverAssessment29032012web.pdf)). The main river course is endangered by even more dramatic changes in the water and sediment regime.



Therefore, there is an urgent need to define adequate protection and restoration measures based on sophisticated ecological data and following the WFD.

- (4) The EC should ask for a Strategic Environmental Assessment of the SRB MP now that the background paper 8 ( Protected Areas) has been updated. This assessment should be conducted to review the effects of the planned developments, especially navigation and infrastructure development (as explained above) on the wider environment. The assessment needs to create a reliable basis from which the ISRBC and the stakeholders can ensure that the plan represents the most sustainable way of managing the aquatic environment. According to this assessment the current SRB MP should be adapted and planned infrastructure projects (Sava-Sava Canal, hydropower plants, storage basin) should be reviewed with respect to these alternations.

## Comments on Restoration and Rehabilitation of the Sava

During the final conference of the EU funded IUCN Life Project, a vision has been drafted by the participants<sup>4</sup>. The participants of the workshop “EXPLORING COMMON GROUNDS (WATERS) FOR SHARING VISION FOR THE SAVA RIVER” recommended to the ISRBC that the “whole free flowing Sava should be part of NATURA 2000”. The ISRBC did not participate in conference.

### Recommendations

The European Commission should support the development of an adequate complementary restoration plan. This plan should define and line up measures for the preservation of the free flowing Sava from Slovenia (Krsko) to Serbia (Belgrade) as well as for the restoration of the modified sections upstream in Slovenia and those in Croatia.

The restoration plan is needed due to the following reasons:

- (1) To guarantee the natural sediment transport of the Sava.
- (2) To mitigate the unreliable water table of the Sava that is tending to decrease and is already affecting navigation, ground water tables and the viability of the huge lowland forests.
- (3) To restore and protect the endangered river bed from erosion<sup>5</sup>.
- (4) To protect and restore the endangered drinking water zone around Zagreb and other settlements

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<http://www.savariver.com/conference/download/presentations/day02/wg/Exploring%20common%20grounds%20for%20sharing%20a%20vision%20for%20the%20Sava%20River.pdf>

<sup>5</sup> [http://www.savariver.com/conference/download/presentations/day01/presentations/Sava%20River-a%20transboundary%20river%20of%20national%20and%20international%20importance\\_Tomislav%20Lukic.pdf](http://www.savariver.com/conference/download/presentations/day01/presentations/Sava%20River-a%20transboundary%20river%20of%20national%20and%20international%20importance_Tomislav%20Lukic.pdf)



## Ecological and Social Impact of planned infrastructure projects

Regarding its ecological characteristics, the free flowing Sava is an important Natura 2000 area. The hydro power dams in Slovenia have already affected the distribution of several indicator species, such as fish (compare EIAs for the proposed new dams at Krsko and downstream). Only the short river section that goes through Zagreb is currently canalized. The planned chain of hydropower dams between Slovenia (Krsko) and Croatia (last dam below Zagreb) would deeply affect the connectivity of the Sava River.

### Recommendations

- (1) The Slovenian and Croatian Natura 2000 processes have to be reviewed, as the free flowing Sava fulfills the criteria of a Natura 2000 site for fish, mollusks, birds and habitats. The Sava gallery forests provide sites and habitats of unique regeneration of indicator species and are known to be a potential Important Bird Area (IBA) based on the data published in the EIA for the Sava regulation project.
- (2) The preparation of EIAs in Slovenia has to be reviewed, as the overall value of the free flowing Sava would be endangered if the planned chain of hydropower dams will be implemented.
- (3) The transboundary impact of the two new hydro dams in the free flowing Sava River continuum should be reviewed according to the ESPOO guidelines with special focus on expected changes in the Slovenian Natura 2000 network. During the public hearing that was carried out with respect to the ESPOO Convention for these two projects no studies on the transboundary impact were presented (e.g. sediment transport, distribution of species, connectivity). EuroNatur commented the lack of transboundary studies in written form during the public hearing in Zagreb and never received any feed-back.

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