



Drava / Drava / Drava
Društvo za ekologiju



On behalf of the NGOs:

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Mr. Stavros Dimas, Commissioner, DG Environment
Mr. Mogens Peter Carl, Director General, DG Environment

Mr. Olli Rehn, Commissioner, DG Enlargement
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Vienna, Budapest, Zagreb, Ljubljana,
Radolfzell, Virovitica, Osijek, Cakovec, Gyekenyes, Novi Sad, 1 October 2007

Re: Open letter to the European Commission

Urgent!

New sediment extraction plan of the Croatian Ministry for Agriculture, Forestry and Water Management contravenes EU environmental law!

River ecosystem of European conservation importance and protected areas are threatened in the Drava-Danube region!

Supporting information and documentation about the ongoing destruction of the natural values of the Drava River in Croatia to the letters to the European Commission, dated 28 June 2007 and 18 September 2007



Dear Commissioners, dear Directors General,

On behalf of the international NGO coalition – WWF, Euronatur, Drava League, Green Action, Croatian Society for the Protection of Birds and Nature, Green Osijek, ZEO Nobilis, ZEUS, Drava Federation, DOPPS-Birdlife Slovenia and Bird Protection and Study Society of Vojvodina – **we have to contact you again and call your attention to the most recent plan of the Croatian Ministry of Agriculture, Forestry and Water Management for the further destruction of the ecological important Drava River and to the ministries ongoing resistance to comply with EU environmental law.**

A few days ago the Ministry has tendered an extensive plan for further sediment extraction along the pristine lower course of the Drava, a future Natura 2000 site. The Ministry plans to provide licences for six sites along the river comprising in total 800 000 m³ of sand to be extracted from the natural river bed in the next 2 to 4 years (*see public tender in "Jutarnji list" from 23 September 2007*).

Deadline of the public tender is the 4th of October 2007!

This plan – beside the recent water management works which have been reported to you in our last two letters dated June and September 2007 (*see letters enclosed*) – is a further big step by the Ministry and Hrvatske Vode (hereafter HV) in this year to transform the natural Drava river course into an uniform canal.

This plan has been issued without assessing its environmental impacts on the valuable river ecosystem and the planned and existing protected areas of more than 170 000 hectares: the natural stretch of the lower Drava within the planned Regional Park "Drava-Mura" and the Special Zoological Reserve, Nature Park and Ramsar site "Kopacki Rit" in the Drava-Danube triangle (*see map enclosed*).

Furthermore, no EIA in a trans-boundary context has been conducted, even though the plan affects areas along the Danube and the Gornje Podunavlje Special Reserve on Serbian territory.

It has been issued without taking into account the provisions of the Water Framework Directive, the Habitat and Birds Directive and the Environmental Impact Assessment Directive, even though it profoundly affects one of the best preserved alluvial wetlands and floodplain forests in the Danube River Basin, once to be included into the Natura 2000 network when Croatia joins the EU.

It threatens European endangered habitats and species such as:

- priority habitats included in Annex I of the Habitats Directive: *91E0** - *Alluvial forests* and *91F0** *Hardwood forests*
- habitats included in Annex I of the Habitats Directive: *3270 - rivers with muddy banks*
- species included in Annex 2 of the Habitats Directive such as *Otter*, *Pond turtle*, *Schraetzer*, *Asp*, *Ballon's (Danube) ruffe*
- species according to Annex 1 of the Birds Directive such as *Stone Curlew*, *Little Tern*¹, *Great Egret*, *Little Egret*, *White-tailed Eagle*, *Black stork* and *Kingfisher*

No public participation has been undertaken though NGOs have repeatedly appealed to the Ministry and HV to apply sustainable management methods and have offered cooperation in finding and applying alternatives.

The intention is following an old plan already issued in 2005 (*see NGO letter to Minister Cobankovic enclosed*) which was immediately stopped by both - the Ministry of Environment and the Ministry of Culture - due to environmental concerns (*see letters from Minister Biskupic and Sate Secretary Ruzinski enclosed*).

This new plan clearly indicates the Ministries' and HVs' rejection to find an appropriate strategy for the development of the Drava river in compliance with the EU law. It clearly contradicts Croatian efforts to harmonise its environmental legislation with the EU *aquis* and it should therefore have political implications with regards to the further approximation of Croatia to the EU.

¹ Due to ongoing sand extraction activities the Little Tern is already extinct as a breeding bird from the Lower Drava river.

Furthermore, this plan undermines the efforts of the Croatian Ministry of Culture to protect the Drava as a Regional Park and Natura 2000 site and to effectively manage the unique Nature Park “Kopacki Rit” as part of a future trans-boundary protected area (proposed UNESCO Trans-Boundary Biosphere Reserve “Danube-Drava-Mura”) together with Austria, Slovenia, Hungary and Serbia.

We are aware that the European Commission holds the position, that the Candidate Countries should apply and implement the provisions of the environmental *aquis* during the pre-accession period, and that all new investments should respect EU environmental law.

Faced with this new plan and with all other current unsustainable water management activities along the Drava we urge the European Commission not to tolerate the ongoing resistance of the Ministry of Agriculture, Forestry and Water Management and HV to comply with EU standards and laws which leads to the destruction of European natural values.

Croatia should be clearly reminded, that meeting EU environmental obligations is a condition for its further integration into the EU and ultimately for EU accession, and that all new investments in an EU candidate country should comply with the EU *aquis*.

Due to the urgency and the ongoing devastation of the natural values in the Drava Region, we urge you to put immediate pressure on the government of Croatia, respectively the Ministry of Agriculture, Forestry and Water Management and HV to immediately stop this tender and all construction activities along the river until EU environmental law is respected, and until an Environmental Impact Assessment (EIA) according to international standards is carried out.

We feel confident that the European Commission shares our views, that negative impacts on these ecologically valuable river are not be allowed, and that development should rather be in harmony with EU environmental legislation.

Experts of the signed NGOs will be pleased to provide any further information to you, and to meet representatives of the European Commission on site at any time of their convenience, in order to present the issue in its proper context and to allow an appropriate monitoring of Croatia’s efforts to comply with the European standards.

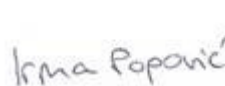
Yours sincerely,



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Damijan Denac
DOOPS-Birdlife
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Marko Tucakov
Bird Protection and Study
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Unique nature along the Drava is threatened by outdated water management activities! ²



² From left to right: Special Zoological Reserve and Nature Park „Kopacki Rit“, Stone Curlew, Otter, Extensive floodplain forests and natural Drava River, Drava-Danube confluence and sand banks, White-tailed Eagle, Black Stork, Oxbow

- Attachments:
- Announcement in "Jutarnji list" from 23 September 2007
 - Map showing the sites and protection status
 - Open letter to Minister Čobanković, dated 29 March 2005
 - Recent letters to the EU-Commission, dated June and September 2007
 - Letters from Minister Bozo Biskupic and State Secretary Nikola Ruzinski from 2005
 - WWF-Booklet "A picture of beauty"

CC:

- EC
- Mr Claude Rouam**, DG Environment
Mr François Delcœur, DG Environment
Mrs Dagmar Kaljarikova, DG Environment
Mr Jorge Antunes, DG Environment
Mr Andrew Murphy, DG Environment
Mrs Anne Burrill, DG Environment
Mrs Henriette Faergemann, DG Environment
Mr Helmut Blöch, DG Environment
- Mr Christian Danielsson**, DG Enlargement
Mr David Daly, DG Enlargement
Mr Tom von Handel, DG Enlargement
- Mr Vincent Degert**, Delegation of the EC to the Republic of Croatia
Mr Oskar Benedikt, Delegation of the EC to the Republic of Croatia
Mr Davor Percan, Delegation of the EC to the Republic of Croatia
Mrs Mojca Starc, Delegation of the EC to the Republic of Croatia
- HR
- Mr Ivo Sanader**, Prime Minister
Mr Božo Biškupić, Minister of Culture
Mrs Marina Matulović-Dropulić, Minister of Environmental Protection, Physical Planning and Constr.
Mr Petar Čobanković, Minister of Agriculture, Forestry and Water Management
Mrs Kolinda Grabar-Kitarović, Minister of Foreign Affairs and European Integration
- Mr Zoran Šikić**, Ministry of Culture
Mr Zdravko Krmeč, Ministry of Agriculture, Forestry and Water Management
Mr Nikola Ružinski, Ministry of Environmental Protection, Physical Planning and Construction
- Mr Vladimir Drobnjak**, Office of the Chief Negotiator
Mr Nenad Mikulić, Ministry of Environmental Protection, Physical Planning and Construction
Mrs Ljerka Alajbeg, Ambassador of the Croatian Embassy Brussel
- Mrs Kornelija Pintarić**, Ministry of Culture
Mrs Andrea Stefan, Ministry of Culture
Mrs Katica Bezuh, Ministry of Culture
Mrs Marija Brajković, Ministry of Culture
Mr Radenko Deželić, Ministry of Culture
Mrs Ivana Jelenić, Ministry of Culture
Mr Davorin Marković, State Institute for Nature Protection
Mrs Jasminka Radović, State Institute for Nature Protection
Mr Neven Trenc, State Institute for Nature Protection
- Mr Slavko Rajnović**, Hrvatske Vode
Mr Siniša Širac, Hrvatske Vode
Mr Zoran Đuroković, Hrvatske Vode
Mr Danko Biondić, Hrvatske Vode
Mr Ivan Cerovec, Hrvatske Vode
- RS
- Mr Sasa Dragin**, Minister of Environmental Protection
- Int
- Mr Tobias Salathe**, Ramsar Convention Secretariat
Mr Philip Weller, Danube Convention Secretariat (ICPDR)
Mr Wiek Schrage, Espoo Convention Secretariat