



Bund für
Umwelt und
Naturschutz
Deutschland



Bund für Umwelt und Naturschutz Deutschland e.V. (BUND),
Kaiserin-Augusta-Allee 5, D-10553 Berlin, bund@bund.net

Europäische Kommission
BERL/Commissioner
Rue de la Loi 200
1049 Brüssel
BELGIEN

March 06, 2020

Dear Commissioner Sinkevičius,
Dear Commissioner Vălean,

on behalf of the Friends of the Earth Germany (BUND), the World Wide Fund for Nature (WWF), Stowarzyszenie Ekologiczne (EKO-UNIA), the German League for Nature and Environment (DNR), the Save the Rivers Coalition (KRR), the Nature and Biodiversity Conservation Union (NABU), OTOP/BirdLife Poland and the Arnika Association, we are writing you to bring to your attention a case of violation of EU environmental laws, resulting from the construction of a Danube-Odra-Elbe waterway.

On August 28, 2019, the Polish Minister of Marine Economy and Inland Navigation, and the Czech Minister of Transport signed a declaration on the co-operation for the development of inland waterways. One of its goals is the canal connection between the rivers Danube (including Morava), Odra and Elbe (from here on called “Danube-Odra-Elbe waterway”). Another goal is the listing of the Odra into the TEN-T to be prioritized which includes access to better funding.

This Danube-Odra-Elbe waterway is supposed to create a connection between the Black Sea, the North Sea and the Baltic Sea. Eventually, the three Seas would be connected by a several hundred kilometers long canal connection with approximately 70 barrages, bridging up to 250 meters of altitude and several tunnels. Concomitant constructions would be situated in several Natura 2000 areas, hence threatening core breeding and resting sites of multiple rare and endangered species.

We deeply agree with you on the premise that it is of central importance to respect the European law – especially the environmental and nature conservation law. Likewise, the feasibility of the project’s objectives must be examined. The construction of the Danube-Odra-Elbe waterway and the waterways in Central and Eastern Europe are extremely environmentally harmful and greatly threaten the level of environmental protection in this region.

First steps to implement sub-projects to the Danube-Odra-Elbe waterway are in the planning process. These include two Elbe barrages, near Děčín and Pardubice and the construction of the Polish section of the Odra-Danube link.

Danger of Ecological Damage and Increase of Flood Risks

Consequences of the envisioned project include 1) immense structural interventions on several large rivers with direct effects on their floodplains, 2) destruction of protected areas as well as 3) loss of cultural landscapes and valuable soils. Therewith, biodiversity loss and overall destruction of strictly protected habitats under EU law are expected. Natura 2000 areas offer a safe haven to Europe’s most valuable and threatened species and habitats, for birds as well as other animal and plant species. The destruction of river morphology and associated freshwater habitats is a violation of the

Water Framework Directive and the European Natura 2000 Directives. 60 % of the EU rivers, lakes and wetlands are not in good status, and hydro-morphological pressures have been identified by the European Environmental agency to prevent the Water Framework Directives objectives from being achieved. The acceleration of flood waves, resulting from the construction of numerous barrages as well as canalized and deepened riverbeds, is expected to worsen flood protection and increase flood risks further.

High Financial Costs – No Benefits

According to our understanding based on the information available on the project so far as well as with respect to the experience of the construction of the Main-Danube Canal, both, structural and financial expenses involved in the channel connection, are underestimated. The estimated current investment level requires modernization or reconstruction of the existing hydraulic structures, driving up the costs even further.

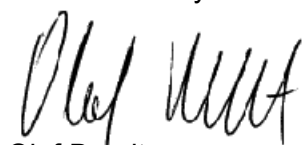
Despite its enormous costs assumably coming up to a minimum of 23 billion euros, the canal project fails to establish a reliable connection between the North Sea, the Baltic Sea and Berlin. For most of the year, major sections of the rivers Odra and Elbe are not navigable for large inland vessels at all. Reliable transport is guaranteed only in the dammed and canalized sections. From the Czech-German border down to the North Sea; transport on the free-flowing Elbe river highly depends on the hydrological conditions which are constantly deteriorating due to climate change.

In 2018, inland navigation on the Elbe was stopped for 180 days at fairway depths far below one meter, and navigability of the Odra and the Morava rivers as a connection to the Danube river are even worse. In order to establish a navigable connection, all three rivers would need to be completely canalized with additional barrages, causing further costs estimated to tens of billions of euros.

A transfer of goods from roads to waterway shipping is not expected from the construction of the Danube-Elbe waterway, as this way of transport would be highly complex and, due to the numerous barrages, slow. Additionally, the Main-Danube Canal already provides a navigable connection between the Black Sea and the North Sea. Also, the Baltic-Adriatic and the Orient-East Med TEN-T Railway corridors work efficiently. Investments should rather be made in the already existing and functioning infrastructure than in new waterways. We see great opportunities in developing environmentally sound transport within the European TEN-T framework and associated coordination of the trans-European transport networks, avoiding ineffective competition of limited funding means. Herein, European regions can be linked as effectively as possible across national borders, contributing to traffic avoidance and minimizing greenhouse gas emissions.

The canal project is not able to achieve its goal of connecting the Black Sea, the Baltic Sea and the North Sea via inland navigation. As the project is enormously costly and would lead to huge environmental damage, we ask the European Commission to form its own independent opinion. The affected countries – the Czech Republic, Poland, Slovakia and Austria – must be warned that this project does not comply with EU Directives. We ask the Danube-Odra-Elbe waterway and the Border Odra and Elbe sub-projects not to be included in the TEN-T network. We would welcome discussing the strategic implications of these projects with you.

Yours sincerely



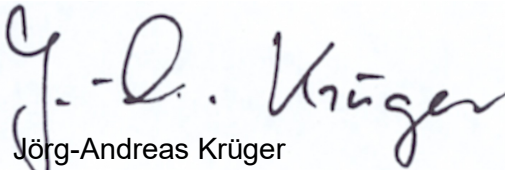
Olaf Bandt
Chairman, Friends of the Earth Germany (BUND)



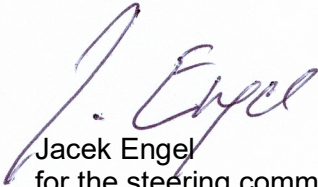
Martin Skalský
Chairman of association Arnika, Czech Republic



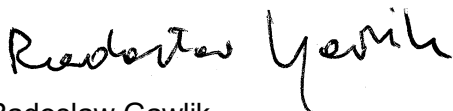
Florian Schöne
Secretary General, German League for Nature and Environment (DNR)



Jörg-Andreas Krüger
President, Nature and Biodiversity Conservation Union (NABU), Germany



Jacek Engel
for the steering committee, Koalicja Ratujmy Rzeki (KRR) / Save the Rivers Coalition (The largest Polish coalition protecting rivers consisting of 45 NGOs, several dozen individual activists and scientists)




Radosław Gawlik
Chairman, Stowarzyszenie Ekologiczne EKO-UNIA



Beata Skarbek-Kruszewska
OTOP President, The Polish Society for the Protection of Birds (OTOP/BirdLife Poland)



Andrea Johauides
CEO, WWF Austria



Andreas Beckmann
Regional CEO, WWF Central and Eastern Europe

Christoph Heinrich
Chairman, WWF Germany

Mirosław Proppé
CEO, WWF Poland

Miroslava Plassmann
CEO, WWF Slovakia

other organizations who also signed

Děti Země



Martin Hytša
Vice-Chairman Children of the Earth

SESK

Společnost pro
ekologickou
stabilitu krajiny, z.s.

Darek Lacina
Chairman, Society for Ecological Stability
of Landscape



Libor Ambrozek
Chairman, Czech Union for Nature Conservation
environmental ngos

**CZECH & SLOVAK
C&S TC
TRAFFIC CLUB**

Miroslav Patrik
Chairman, Czech and Slovak Traffic Club



Petr Ledvina
Chairman, Network of ecological counseling

green circle
zelený kruh
Asociace ekologických organizací

Daniel Vondrouš
Director, Green circle, association of czech