

## **Wetlands International Europe's feedback to the Roadmap for 'Navigation And Inland Waterway Action and Development in Europe (NAIADES) III Action Plan 2021-2027'**

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The natural state of most rivers in Europe has been extensively modified and is still increasingly threatened by infrastructural development. Rivers are ever more disconnected due to dams and other hard infrastructure<sup>1</sup>, meaning few rivers are still free flowing. River damming, channelization and disconnection from riverine landscapes have negative effects on biodiversity, human safety and future economies<sup>2</sup>. Over one-third of Europe's freshwater species are threatened and migratory freshwater fish have declined by 93%.<sup>3</sup>

The European Green Deal announced measures to increase the capacity of inland waterways to 'shift a substantial part of inland freight from road onto rail and waterways'. These intentions are incompatible with the European Commission's ambitions to protect and restore wetland ecosystems to bring substantial socio-economic benefits and to preserve and restore biodiversity in lakes, rivers, wetlands and estuaries. The Commission's target for restoring 25,000 km of free-flowing rivers under the Biodiversity Strategy for 2030 only makes sense if degradation of rivers comes to a halt at the same time.

Therefore, Wetlands International Europe calls on the European Commission **to ensure the appropriate integration of environmental objectives in EU transport policies as a general rule, and in the Navigation And Inland Waterway Action and Development in Europe (NAIADES) III Action Plan 2021-2027 in specific, in order to protect freshwater species and ecosystems in Europe.**

Our feedback on the Roadmap concerning the NAIADES III action plan 2021-2027:

- The Roadmap identifies two core challenges which the 'integrated action plan' must address. However, under the envisaged relevant action areas, the Commission fails to include proposals for ensuring a "sustainable transport system as a whole that fully respects the environmental acquis". Given the close links with and large impact on the achievement of the EU Water Framework Directive (WFD) objectives, we ask the Commission to:
  - clearly **define the relation between the projected development of Inland Waterways and the compliance with the WFD legal requirements** and core principles. The interaction between waterway development and achievement of Good Ecological Potential/Good Ecological Status (GEP/GES) of water bodies needs to be explicitly explained in the NAIADES III Action Plan. The focus should be on **how the Action Plan can help achieve GEP/GES** as part of the ambition of inland navigation transport to adhere to high environmental standards, rather than just avoiding deterioration or identifying mitigation measures.

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<sup>1</sup> There are at least 1.2 million instream barriers in 36 European countries. Source: Belletti, B., Garcia de Leaniz, C., Jones, J. et al. More than one million barriers fragment Europe's rivers. *Nature* 588, 436–441 (2020). <https://doi.org/10.1038/s41586-020-3005-2>

<sup>2</sup> See for example the concerns about the plans for the construction of the E40 inland navigation route connecting the Baltic Sea with the Black Sea: <https://europe.wetlands.org/news/european-rivers-matter/>

<sup>3</sup> Deinet, S., Scott-Gatty, K., Rotton, H., Twardek, W. M., Marconi, V., McRae, L., Baumgartner, L. J., Brink, K., Claussen, J. E., Cooke, S. J., Darwall, W., Eriksson, B. K., Garcia de Leaniz, C., Hogan, Z., Royte, J., Silva, L. G. M., Thieme, M. L., Tickner, D., Waldman, J., Wanningen, H., Weyl, O. L. F., Berkhuisen, A. (2020) The Living Planet Index (LPI) for migratory freshwater fish - Technical Report. World Fish Migration Foundation, The Netherlands.

- Given the above, the Action Plan should **incentivize nature-based solutions which help restoring ecological functions of waterways** and these solutions should be given priority under the Commission's selection criteria for funding.
- The Action Plan should clearly **state that physical measures resulting from the Action Plan do NOT automatically qualify as overriding public interest under the WFD**. In addition, the document should specify that maintenance operations are equally subject to WFD procedures.
- For free flowing rivers, it is complicated to achieve the target physical parameters of waterway dimensions with reasonable means. The Commission should **avoid that the TEN-T framework requirements for navigability make these target values mandatory to rivers where they are impossible**. Remedial measures for navigation on these sections are not cost efficient, thus affecting economic efficiency of the sector. But more importantly, free-flowing rivers are ecologically valuable stretches in Europe. They provide vital havens for Europe's biodiversity, particularly (endangered) migratory species. Measures will most certainly lead to deterioration of the ecological quality. It is preferred to adapt vessel dimensions to the river and not vice versa. For these reasons, we advise to **exclude free-flowing waterways in the NAIADES III targeted actions towards overcoming key infrastructure bottlenecks**.
- In addition, the foreseen action areas identified in the Roadmap do not mention how the Commission wants to deliver on the needed 'integrative approaches among all water users towards ecologic, societal, economic and safety-related functions'. We believe that only a **participatory and multi-disciplinary approach** will contribute to reconciling commitments for inland navigation and ecological protection and restoration, urgently needed to deliver on the objectives of the European Green Deal.
- The Roadmap does not envisage any further public consultation on the initiative before the Commission will publish the NAIADES III action plan 2021-2027. **We urge the Commission to launch a dedicated public consultation** given the potential far reaching consequences for the environment, specifically freshwater ecosystems, of the proposed increase in capacity of inland waterways. The workshop organized in June 2020 to receive feedback from the Naiades expert group cannot be regarded sufficient effort by the Commission to invite stakeholders for specific feedback, as the working group does not involve any representatives from the environmental sector.

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Wetlands International – European Association is an Association of 10 NGOs from 6 European countries, working together to raise awareness about wetland ecosystems and to advocate the sustainable use of wetlands for people and nature. More information on: <http://europe.wetlands.org>.