

To: Ambassador Lars Danielsson, Permanent Representative
of Sweden to the European Union
Co-rapporteurs MEP Barbara Thaler and MEP Dominique Riquet
Chair of European Parliament TRAN Committee MEP Karima Delli
Commissioner Adina Vălean
EVP Frans Timmermans
Commissioner Virginijus Sinkevičius



Brussels, 10 May 2023

Re: Supporting sustainable inland navigation infrastructure in TEN-T

Dear negotiators,

As the trilogue negotiations on the review of the trans-European transport (TEN-T) rules have started, we are reaching out to you as the Living Rivers Europe coalition of NGOs working towards the protection of rivers, lakes and wetlands in Europe, to ask you to agree on a text which promotes sustainable inland navigation while preserving the biodiversity and water cycle in our precious rivers. In this respect, we urge you to exclude from the TEN-T network the Elbe and Sava rivers, and the Ruse-Varna waterway project.

Today, only 40% of Europe's waters are estimated to be in good condition, and navigation is recognised as one of the main pressures preventing Europe's waters from recovering. Regulating rivers to meet TEN-T parameters for inland navigation and building new canals poses high risks for freshwater habitats and species, and makes rivers and surrounding landscapes more vulnerable and less able to adapt in an already changing climate. It is therefore important to make sure that navigation infrastructure does not lead to further deterioration in the current state of rivers. In this respect, we call on you to support the inclusion of a strong Do No Significant Harm principle as proposed by the European Commission in Art 5(3), as well as the reference to alternative transport modes¹, the definition of Good Navigation Status based on the natural conditions of free-flowing rivers², and the addition of a comprehensive definition of free-flowing rivers³, voted by the European Parliament's Committee on Transport and Tourism on 13 April.

The Elbe and Sava rivers are already facing more frequent drought episodes leading to decreased flows. River infrastructure designed to meet TEN-T parameters for inland waterways would consequently mean massive interventions in the river system. Also on the Sava river, climate change is forecasted to drastically increase the frequency of low water in the coming decades and the economic necessity for a massive increase of inland waterway transport capacity has not been proven. On the Elbe river, inland navigation is already suspended for up

¹ AM 13, Recital 13

² AM 47, Recital 45(a) (new)

³ AM 102, Article 3(1)(y) (a) (new)

to six months every year due to a low water table. The current fairway depth target of 1.40 metres has been exceeded for an average of four months a year over the past 10 years, and is sometimes well below one metre.

The free-flowing Elbe and Sava rivers and their floodplains deliver essential ecosystem services: they purify water, retain nutrients and greenhouse gases, and are hotspots for biodiversity as well as the basis for nature tourism. New infrastructure interventions on these rivers to meet ambitious goals for inland navigation will destroy these unique ecosystems and this is why we believe they should not be in the TEN-T network⁴.

The Ruse-Varna waterway project, introduced in the position voted by the European Parliament's Committee on Transport and Tourism⁵, aims to connect the Danube river to the Black Sea near Varna by canalising at least two Bulgarian rivers to build an artificial 192 kilometre-long navigable canal. This project is particularly objectionable as it is not part of the official Bulgarian Integrated transport strategy for 2030 and was never announced officially to the public.

The project was abandoned in the 1970s because of economic, technical and ecological reasons. Resurrecting this project would cause large impacts on the Danube river ecosystem, and also canalise the Rusenski Lom and Provadijska rivers. Rusenski Lom river is part of Bulgarian Nature Park "Rusenski Lom" declared in 1970 for the preservation of biological and landscape diversity and cultural-historical heritage. Mining and other activities that threaten to alter the natural landscape and/or hydrological regime are strictly prohibited. There are at least two Natura 2000 sites in the area - BG0000608 - Lomovete (SCI) and BG0002025 - Lomovete (SPA), for which specific conservation goals will be jeopardised by the project. There are many other concerns related to the cultural heritage (Ivanovo and Basarbovo Rock Churches) and geology of the area. Due to all of these negative impacts, the project is very controversial and there is little or no chance it will ever be realised. Inclusion in TEN-T risks that large amounts of EU funding are wasted on expensive pre-feasibility and feasibility projects.

In conclusion, we urge you to keep the Elbe and Sava rivers out of the TEN-T network, and to exclude the Ruse-Varna waterway project.

Yours sincerely,



Ester Asin

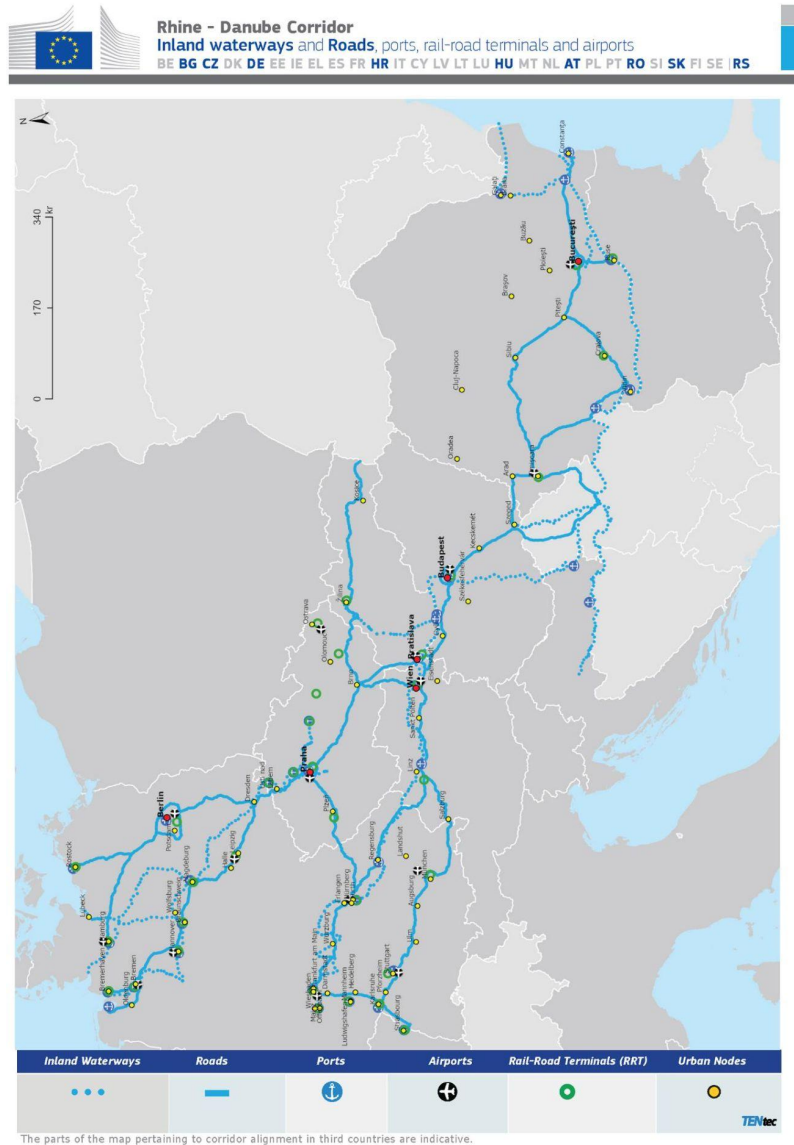
Director, WWF European Policy Office, on behalf of the Living Rivers Europe NGO coalition.⁶

⁴ Both are included in the [Commission's proposal](#), Annex III, Rhine-Danube corridor, Inland waterways and Roads - see annex.

⁵ AM 529, Annex 3- PART 9/14

⁶ Living Rivers Europe, a coalition of five environmental and angling organisations: WWF's European network, the European Anglers Alliance, European Environmental Bureau, European Rivers Network, The Nature Conservancy

ANNEX: European Commission's proposal for including parts of Elbe and Sava rivers in the TEN-T network, annex III.



and Wetlands International. We represent a movement of over 40 million people across Europe and, together, we started the #ProtectWater campaign.