



# **Summary of the Public Participation Activities**

for the

**2<sup>nd</sup> Sava River Basin Management Plan**

Process and outcomes

April, 2022





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## Abbreviations

EU	European Union
FASRB	Framework Agreement to the Sava River Basin
FRMP	Flood Risk Management Plan
ICPDR	International Commission for the Danube River Protection
NGO	Non Governmental Organization
PEG	Permanent Expert Group of the sava Commission
RBMP	River Basin Management Plan
SRBA	Sava River Basin Analysis
SWMI	Significant Water Management Issues
UNECE	United Nations Economic Commission for Europe
WFD	Water Framework Directive

## 1 Introduction

Active public participation in water management and planning on a basin wide level is one of the core principles in sustainable water management as required by the EU Water Framework Directive (WFD) and Framework Agreement to the Sava River Basin (FASRB).

The FASRB Article 21 foresees “implementation and monitoring methodology will include timely provision of information to stakeholders and the general public by the authorities responsible for the implementation of the FASRB.” While Article 14 of the WFD stipulates that in the process of WFD implementation and in particular in the production, review and updating of the river basin management plans, active involvement of all interested parties should be encouraged.

The International Sava River Basin Commission (Sava Commission) in the framework of Sava River Basin Management Plans (Sava RBMPs) preparation ensures and encourages active public participation and facilitates involvement of all relevant stakeholders, creating a mechanism for broad stakeholder participation in preparation and in monitoring of implementation of the of the Sava RBMPs with the Program of Measures and its revisions and updating.

### 1.1 Public participation in the 2<sup>nd</sup> Sava RBMP development process

Following the good practices already established during the preparation of the 1<sup>st</sup> Sava RBMP, public participation activities in preparation of the 2<sup>nd</sup> Sava RBMPs can be summarized into three main categories:

#### 1.1.1 Information sharing and awareness raising

Information about the development process of the 2<sup>nd</sup> RBMP were publicly accessible throughout the preparation period, on the Sava Commission official website. An example is the [2<sup>nd</sup> Sava River Basin Analysis Report](#)<sup>1</sup> (2<sup>nd</sup> SRBA), which developing represents initial step of the 2<sup>nd</sup> RBM planning cycle in the transboundary the Sava River Basin.

Taking into account that EU WFD stipulates that the revision of the characteristics of the river basin districts, environmental impact of human activities on water resources and economic analysis of water use should be performed in the six years cycles, 2<sup>nd</sup> SRBA was prepared by the Permanent Expert Groups of the Sava Commission in cooperation with institutions of the Parties to the FASRB (Bosnia and Herzegovina, Croatia, Serbia and Slovenia) and Montenegro with overall coordination and editing by the Secretariat of the Sava Commission and it was accepted by the Sava Commission at 46<sup>th</sup> Session on 15<sup>th</sup> June 2017.

Moreover, information on the 2<sup>nd</sup> Sava RBMP preparation, are disseminate through the official bulletin of the Sava Commission–[Sava NewsFlash](#)<sup>2</sup>, a periodic publication regularly

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<sup>1</sup> <https://www.savacommission.org/documents-and-publications/water-management-1957/updated-sava-river-basin-analysis/10361>

<sup>2</sup> <https://www.savacommission.org/media/sava-newsflash/289>

distributed to stakeholders directly and as well available through the Sava Commission official web site.



**Figure 1: Official bulletin of the Sava Commission- Sava News Flash**

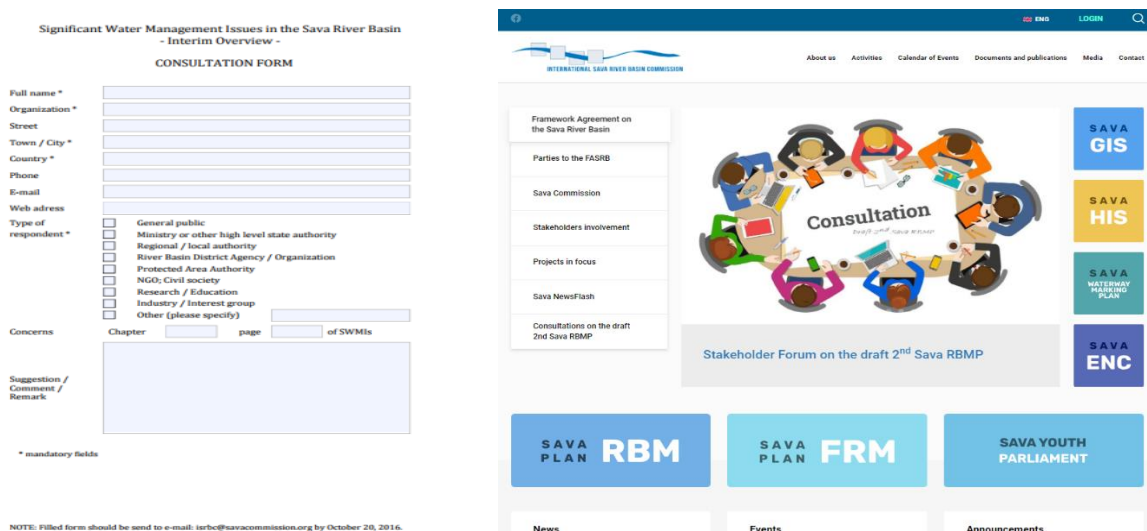
Phases of the of the 2<sup>nd</sup> Sava RBMP development are presented at meetings organized by the Sava Commission or/and other organizations/institutions (ICPDR, UNECE, EU, Danube Strategy, etc.).

### 1.1.2 Consultation activities

Aiming at collecting information and data, discussing issues relevant for the sustainable river basin management in the transboundary Sava RB context, consultation with stakeholders and wider public was organized during the process of 2<sup>nd</sup> Sava RBMP preparation.

Public consultation for the documents prepared in the process of the 2<sup>nd</sup> Sava RBMP development are organised via the web.

- Interim Overview of the Significant Water Management issues in the Sava River Basin from 29 July 2016 until 20 October 2016
- Draft 2<sup>nd</sup> Sava RBMP with the Programme of Measures from 23 November 2021 to 23 march 2022



**Figure 2: Consultation campaigns for the SWMI and 2<sup>nd</sup> Sava RBMP**

All consultation activities together with the Sava Stakeholder forum for the 2<sup>nd</sup> Sava RBMP were organized online. Valuable contribution from representatives of national authorities, research institutions, national and international NGOs were received during the consultation campaigns and addressed in the process of the 2<sup>nd</sup> Sava RBMP finalization.

### 1.1.3 Active involvement of stakeholders

The overall process of the Sava RBMPs preparation is led by the Permanent Expert Groups for River Basin Management (PEG RBM) and PEG GIS of the Sava Commission. Certain issues touching upon the 2<sup>nd</sup> Sava RBMPs have been subject to ad-hoc discussions of other expert groups (PEG FP, PEG HMI, PEG NAV and PEG APC) in accordance with their competences.

A major stakeholders or stakeholder groups have an opportunity to actively participate in the process, as well as in all other activities of the Sava Commission, by gaining the Observer status. This opportunity is well-utilized by organizations already holding this status to actively participate at the meetings of the Sava Commission and its PEG RBM which is considered as a valuable asset during the process.

**Table 1: ISRBC's Observers as of August 2021**

Observer	Web link
Republic of North Macedonia	<a href="https://vlada.mk/">https://vlada.mk/</a>
International Commission for the Danube River Protection (ICPDR)	<a href="https://www.icpdr.org/main/">https://www.icpdr.org/main/</a>
Danube Commission	<a href="https://www.danubecommission.org/dc/en/">https://www.danubecommission.org/dc/en/</a>
Global Water Partnership for central and eastern Europe (GWP/CEE)	<a href="https://www.gwp.org/en/GWP-CEE/">https://www.gwp.org/en/GWP-CEE/</a>
World Wide Fund for Nature Adria	<a href="https://www.wwfadria.org/">https://www.wwfadria.org/</a>
EuroNatur Foundation	<a href="https://www.euronatur.org/en/">https://www.euronatur.org/en/</a>

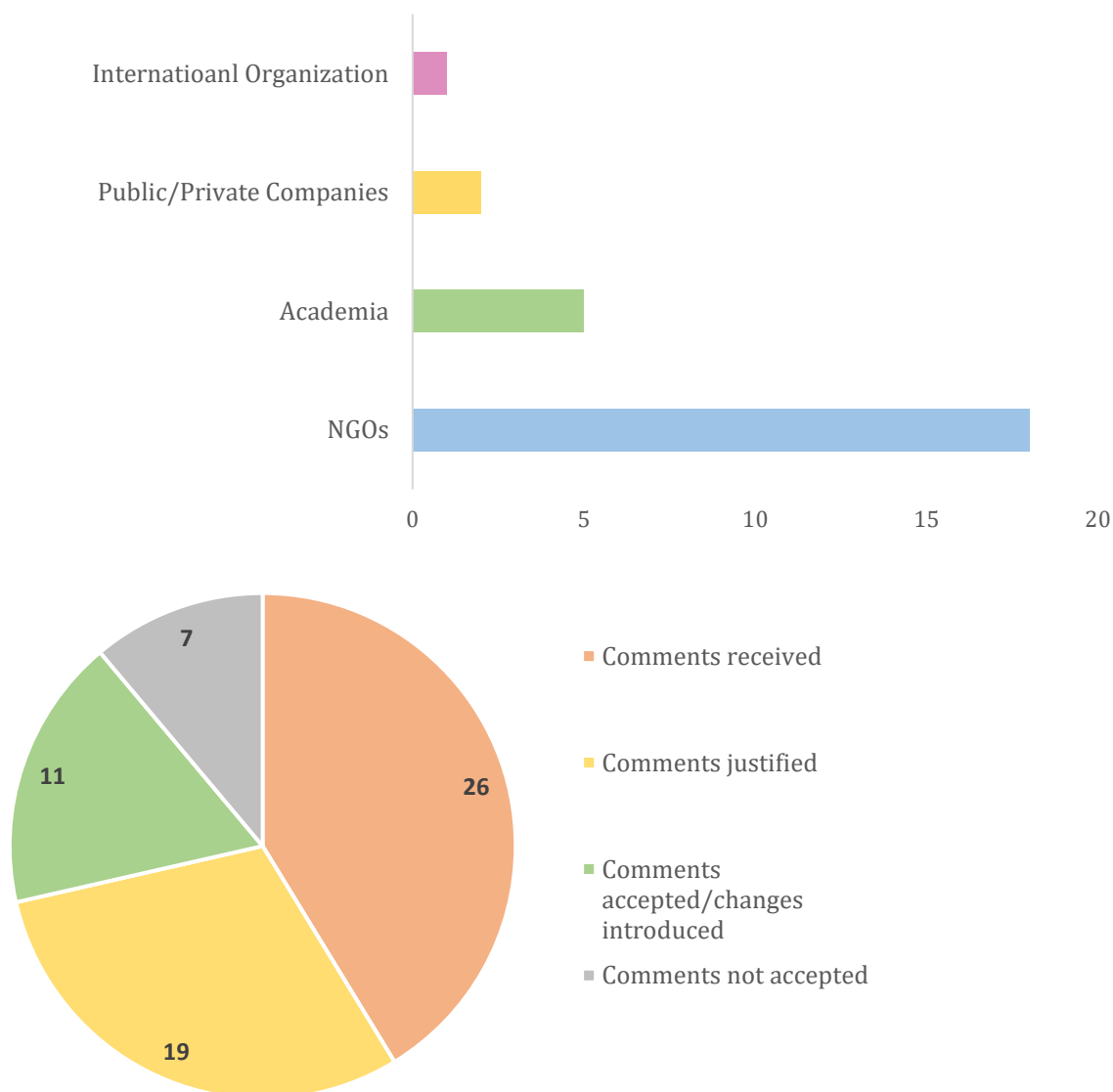
## 2 Public Consultation campaigns

### 2.1 Interim Overview of the SWMI in the Sava RB

The SWMI document was made available to the public consultation from 29 July 2016 until 20 October 2016. On the official Sava Commission web site. A total of 26 comments on the draft SWMI paper were received. All of them were taken in consideration immediately after the deadline for consultation, during the PEG RBM 32<sup>nd</sup> meeting, held on 20-21 October 2016. During the response process PEG RBM justified 19 comments while 7 comments were not accepted. Out of 19 justified comments, for 11 comments it was concluded that caused corrections of the SWMI's paper final text.

The PEG RBM, as the expert body of the Sava Commission agreed upon changes in the document at its 32<sup>nd</sup> meeting. The document was confirmed by PEG at its 35<sup>th</sup> meeting, held in Zagreb on January 23-24, 2018. The final draft was, thereafter, submitted to the Sava Commission and was accepted on the 48<sup>th</sup> Session held in Zagreb on February 20-

21, 2018. The final version of the [SWMI paper](#) is available on the Sava Commission website<sup>3</sup>.



**Figure 3: Results of the public consultation for the SWMI document**

## 2.2 Draft 2<sup>nd</sup> Sava RBMP

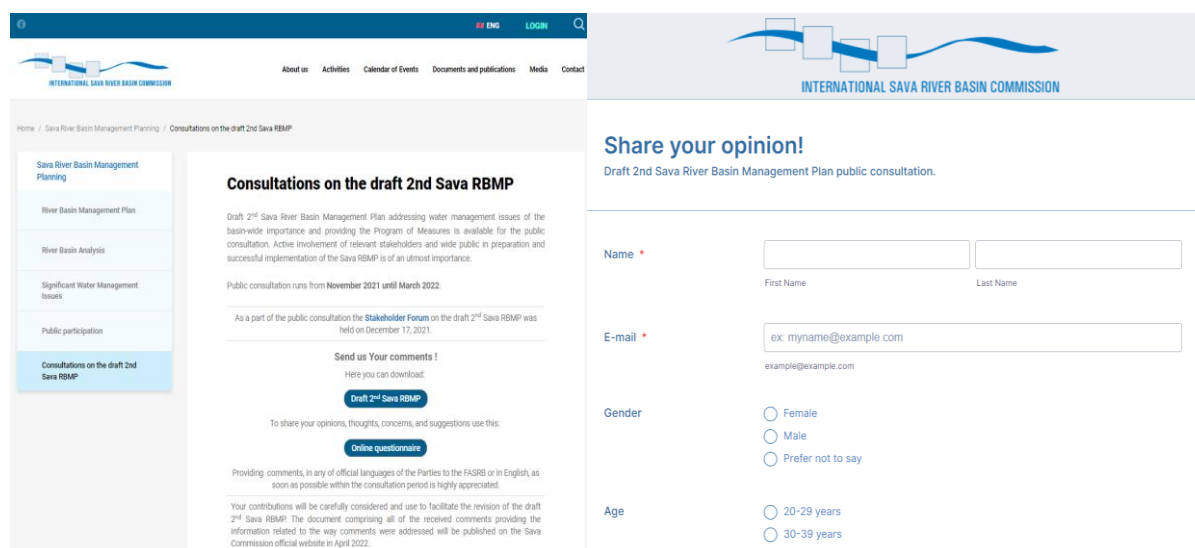
In accordance with the relevant conclusion of the Sava Commission, the public consultation campaign for the draft 2<sup>nd</sup> Sava RBMP with a motto *“Let’s jointly discuss”* was launched on 23 November 2021 scheduled to last until 23 March 2022. For the platform for public consultation, the official Sava Commission web site was selected aiming to contribute to the suppressing the spread of the COVID-19.

<sup>3</sup>

[https://www.savacommission.org/UserDocsImages/05\\_documents\\_publications/water\\_management/SavaRBMPPlan//swmi-interim\\_overview.pdf](https://www.savacommission.org/UserDocsImages/05_documents_publications/water_management/SavaRBMPPlan//swmi-interim_overview.pdf)



As the first step of the public consultation process, on the web page within the renovated official web site of the Sava Commission the draft 2<sup>nd</sup> Sava RBMP was disclosed. To facilitate commenting and the Public Questionnaire was developed and on the same web page was available for all interested.



**Figure 4: Web page for the consultation and Public Questionnaire**

### 2.2.1 Sava Stakeholder Forum for the 2<sup>nd</sup> Sava RBMP

To launch and promote public consultation campaign the Sava Commission, following the successful practice of the public participation and consultation activities in the river basin planning and flood risk management planning in the process of the development Sava RBMP (2014), Sava FRMP (2019), organised on 17 December 2021 Sava Stakeholder Forum as an online event.

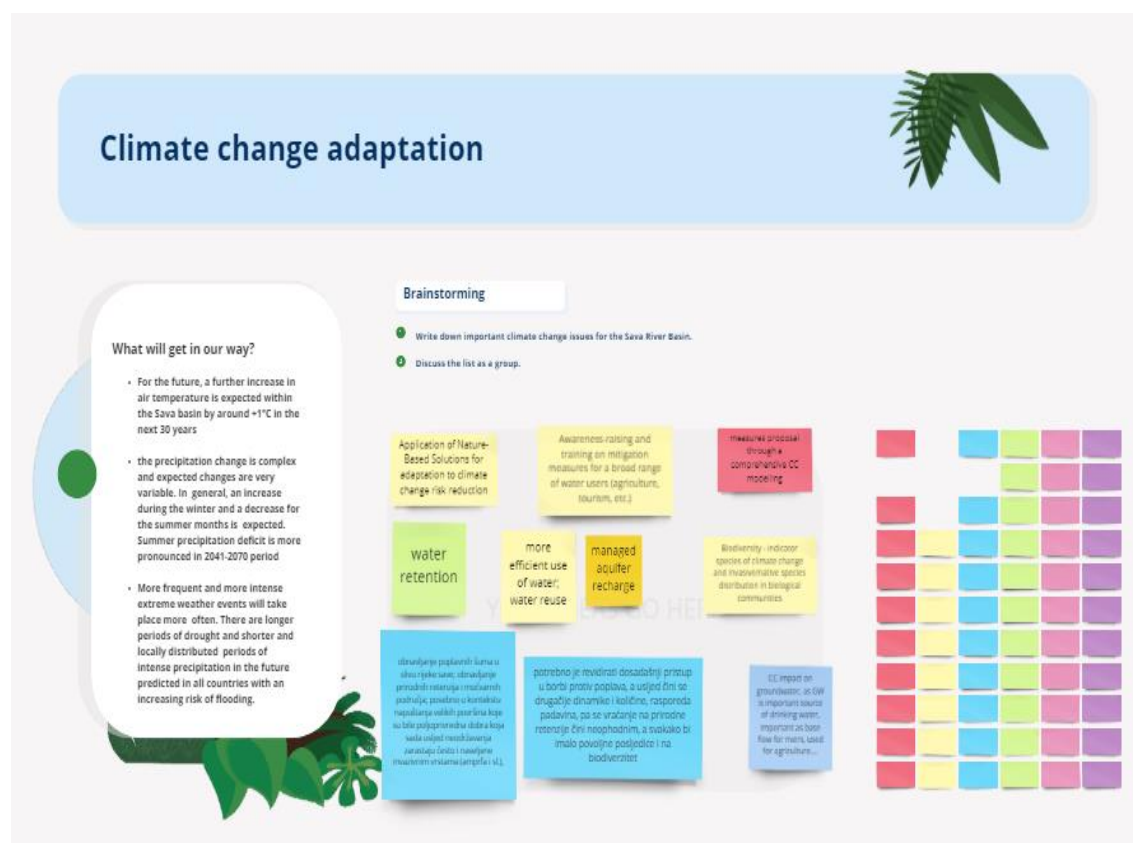
The Sava Stakeholder Forum, attended by more than 80 participants (the list of participants provided in Appendix C), representatives of the Ministries, national authorities, public companies, NGOs, academia, scientific institutes and private sectors, as well as international organizations and Observers to the Sava Commission. The official opening was followed by the first public presentation of the results and key preliminary findings of the draft 2<sup>nd</sup> Sava RBMP.

With aim to facilitate the involvement and to encourage discussion among participants, the second part of the Forum was organized in the three group sessions through a [MIRO online collaboration platform](#)<sup>4</sup> allowing participants to visualise feedback and ideas. In accordance with preferences expressed in the registration process participants were divided into the groups discussing the predefined topics: the 2<sup>nd</sup> Sava RBMP development, Integration issues and climate change adaptation and Program of Measures and financing opportunities.

The work in group I, aimed at discussing the benefits of the transboundary Sava River Basin management planning and as well possibilities for enhancing basin wide policy framework for prevention of further deterioration or/and improvement of status of all

<sup>4</sup> [https://miro.com/app/board/uXjVOcUvgOU=?invite\\_link\\_id=469094637288](https://miro.com/app/board/uXjVOcUvgOU=?invite_link_id=469094637288)

waters and facilitation of the best practices/information/knowledge sharing and achievement of the long-term sustainable use of water resources through transboundary cooperation. Participants analysed the 2<sup>nd</sup> Sava RBMP concerning interconnections between its main strengths, weaknesses, opportunities, and threads for successful implementation (results of the discussion presented in the **Error! Reference source not found.**).



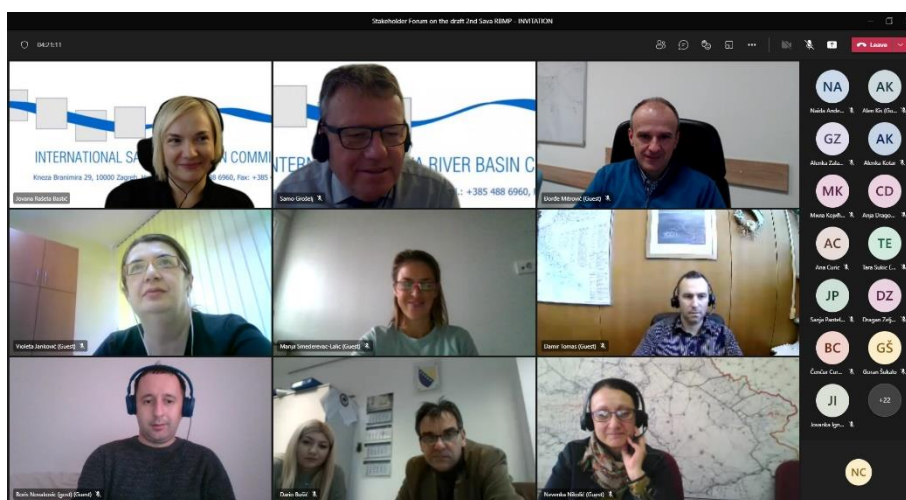
**Figure 5: MIRO collaborative platform example**

The participants interested in integration issues and climate change adaptation in Group II discussed co-dependency of the sectoral development policies and synergetic possibilities for coordinated development in enhancing sustainability and resilience of the whole Sava River Basin region. As issues that require more attention in the following planning cycles, nature and biodiversity protection and sustainable tourism are preliminary identified. Moreover, suggestions were provided that navigation development issues and water pollution can be elaborated in more details due to its possible effect on the water status. Significant recommendations were provided for enhanced involvement of NGOs, private sectors and intersectoral cooperation, through workshops, trainings, and field exercise and for improved data exchange between sectors. Regarding the climate change adaptation, participants supported the approach pursued considering climate change issues within the Sava RBMPs. Additionally, as climate change adaptation activities that can draw more attention in the following planning documents/cycles among others are mentioned nature-based solutions, water retention measures, comprehensive climate change modelling, aquifer recharge and development of biodiversity indicators of climate change.

Within the Group session III, participants discussed the Programme of measures and the possibilities for its financing. While all measures implemented and listed into the 2<sup>nd</sup> Sava

RBMP are assessed as relevant, the majority of the participants declared that the level of implementation of the specific measures addressing significant or other water management issues are not sufficient and that should be improved. As well participants express their opinion related to the prioritization of the specific measures implementation and aiming to define the sustainable, technologically based and economically sound way forward in transboundary river basin management, the participants indicated their opinions related to the financing opportunities for the measures addressing specific water management issues.

In the closure part of the Sava Stakeholder Forum, the result from the discussion performed in the group sessions were presented and in the plenary discussion, participants contributed with the suggestions and recommendation related the future steps toward the sustainable Sava River Basin management.



**Figure 6: Some of the participants on the Sava Stakeholder Forum (MS teams platform)**

Great contribution with respect to the assistance in the successful Forum organization and facilitation of the work was provided by the PEG RBM members Naida Andjelić and Violeta Janković from Bosnia and Herzegovina, Damir Tomas from Croatia and Nevenka Nikolić and Miodrag Milovanović from Serbia.

**Table 2: Sava Stakeholder Forum conclusions related to Sava RB RBMP**

<b>STRENGTH</b>		<b>WEAKNESSES</b>	<b>ADDRESS WEAKNESSES</b>
<p>Implementation of the EU requirements</p> <p>Information and knowledge building and sharing</p> <p>Joint planning and action</p> <p>Basin wide step by step harmonization of the planning process</p>		<p>Not yet sufficient harmonization of the planning processes and approaches within the riparian countries</p> <p>Conflicting interests in water management in the riparian countries</p> <p>Varieties of the development ideas and different priorities on a country level and taking into consideration different sectors</p> <p>Numerous interested parties, different stakeholders, and interest groups</p>	<p>Strengthening the transboundary cooperation</p>
<b>OPPORTUNITIES</b>	<b>USE OPPORTUNITIES</b>	<b>THREATS</b>	<b>PREVENT THREATS</b>
<p>Joint application for the international project funding</p> <p>Intersectoral cooperation</p> <p>Strengthening the eco resilience</p> <p>Mechanism development for joint protection from the harmful transboundary effects</p> <p>Enhancement synergies, by setting the joint goals</p> <p>Learning through experience exchange</p> <p>Harmonization of the methodologies and approaches in RBM</p>	<p>Facilitate knowledge and information exchange by organizing the workshops, study visits</p> <p>Enhance the interinstitutional experience exchange (best use of lesson learnt since countries are in the different planning cycles)</p> <p>Best practices from the riparian countries should be used as an example, and the common model for the further advancement</p> <p>Facilitate the reaching of the basin wide consensus</p> <p>Facilitate usage of the scientific knowledge</p>	<p>Action can remain on paper (in written form) and not implemented</p> <p>Planning document taken into consideration solely by the water management institutions and not by the other sectors</p> <p>If climate action is not prioritized while economic development is</p> <p>Lack of political will</p> <p>Lack of financial and human resources</p>	<p>Building solid knowledge base to ensure common understanding</p> <p>Transparent planning and implementation</p> <p>The issue presented in the planning documents should be elaborated for the communication for different stakeholders and on the different levels</p> <p>Establish communication with decision makers to increase political will for actions implementation.</p> <p>Extension of the data collection and exchange to create solid knowledge base for decision making</p> <p>Increase stakeholder involvement in the planning process</p>

## 2.2.2 Results and outcomes of the public consultation for the 2<sup>nd</sup> Sava RBMP

During the period dedicated to public consultation campaign, 2 individual contributions were received. The list of commenters is provided in the Appendix A.

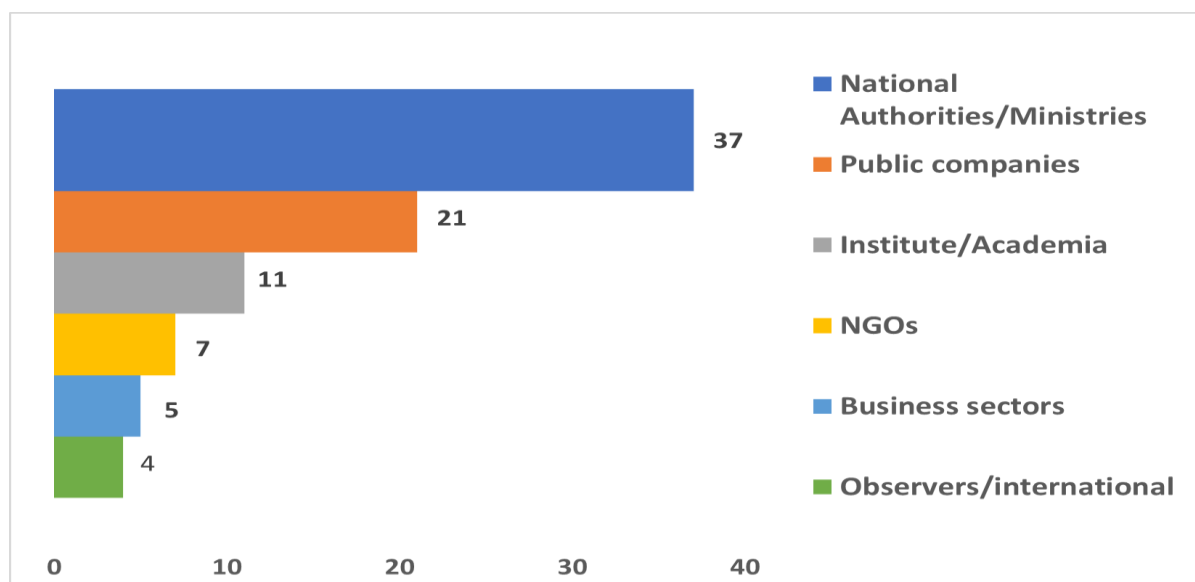
The contributions were considered and addressed. One contribution was a general comment on the planning process in the Sava River Basin, which can be classified as an information. The second contribution consisted of 2 comments which were taken into consideration, justified and required changes to the final draft of the 2<sup>nd</sup> Sava RBMP were introduced. The list of comments received and the way they have been addressed is provided in the Appendix B.

## 2.2.3 Stakeholder analysis

Willing to promote involvement and to establishment a mechanism which will secure an efficient public participation in the preparation and monitoring of the 2<sup>nd</sup> Sava RBMP implementation as well as in the subsequent planning cycles, comprehensive analysis of stakeholders was performed.

The list of relevant stakeholders at national and transboundary level (which include all relevant stakeholders in the Parties of the FASRB and in Montenegro as well) has been updated.

The information that public consultation campaign was launched and invitations to Sava Stakeholder forum were disseminated to the list made based on the updated stakeholder database, aiming to ensure that the stakeholders participation is inclusive and representative.



**Figure 7: Representation of the stakeholder groups in the Sava Stakeholder Forum**

The results of the public consultation campaign, provided insights to be used in future detailed plan development for the public participation activities and present a good basis for further enhancement of the stakeholder involvement in the process of implementation of the Sava RBM Plans, and as well in the process of implementation of the FASRB.

## Appendix A List of respondents to the consultation

Commenter	Organization	Date of submission	Number of comments
<b>Jelena Matic Varenica</b>	Republic geodetic authority of Serbia	December 15, 2021	1
<b>Ana Ćurić</b>	Ministry of Education and Culture of Republika Srpska Institute for the Protection of Cultural, Historical and Natural Heritage	March 21, 2022	2

## Appendix B List with received comments and related responses

Commenter	Organization	Date	2 <sup>nd</sup> Sava RBMP Chapter referred	Comment	Accepted Yes/No	Change in the text	Explanation/Justification
Jelena Matic Varenica	Republic geodetic authority of Serbia	December 15, 2021		No specific part of the plan addressed. General comment Since RBMP 2022-27 deem flood risk management sector as important in future infrastructure projects , it should be noted that Serbia started activities in Risk Register implementation. Having in mind its technical specificities and purpose, utilisation of its web services within Sava GIS Geoportal would be feasible and very valuable. Technical implementation of Risk Register is dedicated to Republic geodetic authority and should be finished by the middle of 2022.	Acceptance not required	/	/

## Appendix B List with received comments and related responses

Commenter	Organization	Date	2 <sup>nd</sup> Sava RBMP Chapter referred	Comment	Accepted Yes/No	Change in the text	Explanation/Justification
Ana Ćurić	Ministry of Education and Culture of Republika Srpska Republic Institute for the Protection of Cultural, Historical and Natural Heritage	March 21, 2022	Annex 9	<p>U dodacima, nisu korektni podaci zaštićenih područja BiH odnosno RS. U prilogu vam dostavljam i screenshot strana gdje je potrebno uraditi korekciju. Lisina nije zaštićeno područje, kao ni Bardača. I potrebno je izvršiti korekciju naziva Univerzitetski grad.</p> <p>U prilogu vam šaljem tabelu zaštićenih područja Republike Srpske do marta 2022. godine, gdje sam vam istakla područja koja se nalaze u slivu rijeke Save (ako je potrebno konkretnije, uradićemo korekcije, a ja vam šaljem doslovno sve što pripada slivu rijeke Save). Na narednom linku možete vidjeti prostorni raspored i na taj način izbaciti eventualno područja koja smatrate da ne treba da budu dio navedenih u datom dokumentu:  <a href="http://e-priroda.rs.ba/en/protectedsites/">http://e-priroda.rs.ba/en/protectedsites/</a>  i za FBiH  <a href="http://e-prirodafbih.ba/en/protectedsites">http://e-prirodafbih.ba/en/protectedsites</a></p>	Yes	Chapter 5 Annex 9 Map 17	<p>Comment provided addresses the list of the protected areas on the territory of Bosna and Herzegovina.</p> <p>The changes are introduced in the list provided in the Annex 9 Table 1. The list of protected areas important for the protection of habitat and species.</p> <p>However related to protected area Bardača, it remains on the list since it is protected in accordance to the International convention declared as Ramsar site (number 1658)</p>



## Appendix B List with received comments and related responses

Commenter	Organization	Date	2 <sup>nd</sup> Sava RBMP Chapter referred	Comment	Accepted Yes/No	Change in the text	Explanation/Justification
			Chapter 9	U prilogu vam dostavljam jedan od izvještaja u kojima se pominju gradovi u FBiH koji su pokriveni sa postrojenjima za tretman otpadnih voda, a koji su pomenuti na strani 118.	No	No	The list delivered is total list of existing WWTPs in BA_Fed, while at the page 118 Ch.9 Programme of Measures, WWTPs listed are ones that were realized in the period after the 1 <sup>st</sup> Sava RBMP, as it was agreed in the development phase of the draft 2 <sup>nd</sup> Sava RBMP.

## Appendix C List of the Sava Stakeholder Forum participants

Table 1: The list of Sava Stakeholder Forum participants, in alphabetical order (all date and information are as provided by the participants)

No	Name	Organization/Institution	Contact e-mail
1	Alan Mahmutović	Udruga Slap - Udruga za očuvanje hrvatskih voda i mora	al.mahmutovic@gmail.com
2	Aleksandra Drobac	Ministry of Environmental Protection of Republic of Serbia	aleksandra.drobac@ekologija.gov.rs
3	Aleksandra Kovačević	Javna ustanova "Vode Srpske" Bijeljina	akovacevic@voders.org
4	Aleksandra-Anja Dragomirović	Centar za životnu sredinu / Center for environment (CZZS / CfE)	anja.dragomirovic@czzs.org
5	Alen KIŠ	Pokrajinski zavod za zaštitu prirode, Novi Sad	alen.kis@pzzp.rs
6	Alenka Mubi Zalaznik	LIMNOS	alenka@limnos.si
7	Alenka Kotar	Direkcija za vode (Slovenia)	alenka.kotar@gov.si
8	Amina Hasečić	Sava River Watershed Agency	amina.hasecic@voda.ba
9	Ana Čurić	Republic Institute for the protection of cultural, historical and natural heritage	a.curic@kipn.vladars.net
10	Ana Marić	University of Belgrade, Faculty of Biology	anatosic@bio.bg.ac.rs
11	Barbara Cencur Curk	GWP Slovenia	barbara.cencur@ntf.uni-lj.si
12	Biljana Rajić	Ministry of Foreign Trade and Economic Relations of Bosnia and Herzegovina	biljana.rajic@mvteo.gov.ba
13	Biljana Kilibarda	Institute of Hydrometeorology and Seismology	biljana.kilibarda@meteo.co.me
14	Bojana Rakic	Ministry of Environmental Protection	bojana.rakic@ekologija.gov.rs
15	Boris Novakovic	Serbian Environmental Protection Agency	boris.novakovic@sepa.gov.rs
16	Branka Popović	PWMC Srbijavode	branka.popovic@srbijavode.rs
17	Brankica Milojević	Univerzitet u Banjoj Luci, Arhitektonsko-građevinsko-geodetski fakultet	brankica.milojevic@aggf.unibl.org
18	Damir Tomas	Hrvatske vode	damir.tomas@voda.hr
19	Dario Bušić	Ministry of Communications and Transport of Bosnia and Herzegovina	dario.busic@mkt.gov.ba
20	Darko Novakovic	Institute of Hydrometeorology and Seismology of Montenegro (IHMS)	darko.novakovic@meteo.co.me
21	Darko Barbalić	Hrvatske vode	darko.barbalic@voda.hr
22	David Latinović	JU Vode Srpske	dlatinovic@voders.org
23	Davorin Piha	Hrvatske vode	Davorin.Piha@voda.hr
24	Dejan Dimkić	Serbia, Jaroslav Černi Water Institute	dejan.dimkic@jcerni.rs
25	Dejan Vladiković	Republički Hidrometeorološki Zavod Srbije	dejan.vladikovic@hidmet.gov.rs
26	Duško Milošević	Ministarstvo prosvete, nauke i tehnološkog razvoja	dusko.milosevic@mpn.gov.rs

27	Đorđe Mitrović	University of Belgrade-Faculty of Economy	djordjem@gmail.com
28	Edith Hödl	ICPDR	edith.hoedl@icpdr.org
29	Esen Kupusović	Federalni hidrometeorološki zavod BiH	esena.kupusovic@gmail.com
30	Florjana Ulaga	Slovenian Environment Agency	florjana.ulaga@gov.si
31	Gordana Bušelić	Croatian Meteorological and Hydrological Service	gordana.buselic@cirus.dhz.hr
32	Gordana Špegar	Ministry of Agriculture, Forestry and Water Management, Republic Water Directorate, Serbia	gordana.spegar@minpolj.gov.rs
33	Haris Hadžihajdarević	Nacionalni park Una	jp.np.una@gmail.com
34	Ivan Mitrović	Ministry of Construction, Transport and Infrastructure – Directorate for Inland Waterways	imitrovic@plovput.rs
35	Ivan Pavković	Hrvatske vode	ivan.pavkovic@voda.hr
36	Ivan Vučković	Elektroprojekt	ivan.vuckovic@elektroprojekt.hr
37	Ivana Spasic	PWMC Srbijavode	ivana.spasic@srbijavode.rs
38	Jasna Plavsic	University of Belgrade - Faculty of Civil Engineering, Serbia	jplavsic@grf.bg.ac.rs
39	Jelena Vicanovic	Javna ustanova "Vode Srpske" Bijeljina	jvicanovic@vodrs.org
40	Jelena Pinezić Malbaša	Ministry of Economy and Sustainable Development	jelena.pinezicmalbasa@mingor.hr
41	Jelisaveta Nikolić	JVP Srbijavode	jelisaveta.nikolic@srbijavode.rs
42	Jovanka Ignjatovic	Self-employed	vanaignjatovic@gmail.com
43	Katarina Cetinic	Ruder Boskovic Institute	kcetinic@irb.hr
44	Konstantin Ivanov	Global Water Partnership Central and Eastern Europe	konstantin.ivanov@gwpcee.org
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