



One of the created black grouse centres in the Krkonoše Mts including an open area for lekking grouse, solitary trees or small tree groups providing shelter to the birds, vegetation offering appropriate food (blueberries, birches, rowans) and also an exposed patch for the collection of grit. Photo Jiří Flousek.

National Park (such as keeping to marked trails), there is probably no help for the grouse.

Is there anything we can do?

Certainly! Possible ways to solve the problems are given by the abovementioned list of problems with the black grouse. We can probably not return lost habitats to them, but we can preserve and try to connect the still remaining suitable ones. A total of 24 black grouse ‘centres’ with a total area of 86 hectares have been created in the Jizera and Krkonoše Mts in the last four years (Dostál & Kavková 2015, J. Flousek unpubl.). By cutting woodland, open areas have been formed for completely new or lost lek sites, moreover at flight distance in order to give at least grouse females a chance to fly from the Jizera to

the Krkonoše Mts or back, or gradually ‘skip’ from the west to the east of the latter mountain range.

The mentioned invisible obstacles can be removed with a simple technical solution: securing cables of cableways and ski lifts with hangers deterring the birds (the FireFly type – www.hammarprodukter.com seems the most appropriate for the time being), and either building mesh fences no longer or securing them by visual elements (e.g. upper or lateral cross-bars).

Also disturbance of black grouse can be limited to an acceptable level. However, we cannot do here without a responsible attitude of every inhabitant and visitor of our mountain ranges. Black grouse can adapt to human movement along well-

known routes. Any deviation from them is however a problem for the birds. And remember that in winter such a problem can be caused by just a few irresponsible individuals who enter inaccessible places left for a peaceful development of nature and its inhabitants.

There is no time to lose. We have some ten to twenty years to try and reverse the unfavourable population trend and maintain the black grouse in the Krkonoše and Jizera Mts as well as the rest of the Czech Republic in sufficient numbers, therewith preserving this fascinating and iconic bird species for the next generations!

A list of references is attached to the web version of the article at www.casopis.ochranaprirody.cz

Has a feasibility study on the Danube-Oder-Elbe Canal really been performed?

Petr Havel

The preparation of large infrastructural works has long been criticised for being time-demanding and ineffective. Drafts of amendments to construction law have repeatedly been submitted in order to shorten and facilitate the approval process. Recently, a proposal for its integral recodification was submitted. The actual administrative process aimed at realising a construction is however to a great extent the final stage in the prepa-

ration of a construction. Efforts for systematic changes in building permit procedures should therefore be preceded by a comprehensive analysis of shortcomings already in the stage prior to the building permit procedure. It is not an overstatement to say that the stage of project preparation and specification of the project at different levels in spatial planning documentation have much greater margins than the building permit stage.

Morava river in Litovelské Pomoraví Protected Landscape Area. Photo Zdeněk Patzelt



Why feasibility studies?

A valuable instrument (especially with large constructions) is also a feasibility study, the objective of which should be – besides assessment of technical aspects of the realisation – a complete examination of the feasibility of a project with regards to all other interests protected by legal regulations and international conventions. Even though the compilation of such a study may be demanding, the resulting study should help prevent the investor from ineffective investments into an inappropriately designed project.

The project of a connection of Danube, Oder and Elbe (D-O-E) for navigation has a truly rich history dating back to the Middle Ages, when Charles IV first came with this plan. In 2016, the Czech government, member state of the European Union (thus, among others, bound to obligations following from its environmental legislation) and party to many environmental conventions, adopted an update of the Spatial Development Policy, i.e. a top priority document of the Czech Republic in the area of spatial development planning. Under Paragraph 180, the Ministry of Transport was assigned the task to “Examine the effectiveness and feasibility of the Danube-Oder-Elbe connection to assess its possible realisation in a complete European context (incl. environmental aspects), its transport efficiency and the demandingness of the different branches” to be completed in 2018. This step should have contributed to an end of the disputes between opponents to the project, not knowing why there is still debate about the project, and its proponents, regarding conservationists as fanatic environmentalists not understanding the ‘environmental benefits’ of water transport.

The study was commissioned to the ‘D-O-E Association’, created for the needs of the tender process realised by the Ministry of Transport, being a conglomerate of the companies Vodní cesty, a.s., Sweco hydroprojekt, a.s. and Aquatis, a.s. The timetable for performing the study (and the interdepartmental comment procedure) aimed at completion by the end of 2017. At the same time, a monitoring committee including Polish and Slovak representatives was established, but Austrian members were not included (expressing Austria’s opin-



View of the Elbe river from Dubeč, České středohoří Protected Landscape Area. Photo Zdeněk Patzelt



Riparian forests in the UNESCO Biosphere Reserve at the confluence of the Thaya and the Morava. Photo Zdeněk Patzelt

ion by their absence). The committee should monitor, guide and provide feedback to the material during its entire compilation. However, the fear of rather biased document compilation by the D-O-E Association turned out to be justified, and members of the monitoring committee not primarily interested in the construction did not have influence on the study to the extent necessary.

What could be a barrier for its feasibility?

River navigation usually demands large constructions adjusting the flow. These lead among others to changes in the regime of surface- as well as groundwater, in physical-chemical features of the watercourse, to a significant reduction in habitat diversity of rivers and their floodplains, and are a se-



Kaňon Labe National Nature Reserve downstream of Děčín. Photo Zdeněk Patzelt

rious intervention in the natural conditions of a river ecosystem (Rulík et al. 2014). The natural process of drift and sedimentation of river deposits is disturbed, accompanied by a loss of valuable habitats, and it also leads to a reduction in migration permeability of the waterbody and of the landscape for aquatic as well as some terrestrial animals (Krátký, Löw 2005). At the same time, the mentioned effects cannot be removed by technical solutions and can thus de facto not be compensated for. Realisation of the D-O-E connection would cause a change in water regime and have a negative impact on the natural functions of the rivers Morava, Bečva, Oder and Elbe and their floodplains, including adjacent floodplain soils and riparian forest ecosystems, which are unique in terms of extent and naturalness in the European context.

Watercourses and wetlands belong to the world’s most endangered ecosystems, providing many ecosystem services, and their role in the landscape is irreplaceable (MŽP 2015, Mach et al. 2016). Watercourse canalisation leads to a significant loss of their ecological functions and to a considerable disturbance of the natural water regime, due to which lower water retention of the

landscape manifests itself very negatively now that the climate is changing. We should add to this the impact on the actual waterbodies, including the essential influence on groundwater in floodplains and on the connected drinking water resources, which are of life importance, and further on water quality, sedimentation processes, bed-load regime and minimum and maximum flowrates (drought, floods). These ecosystems should on the contrary be in the forefront of interest with regards to the conservation, support and restoration of their functions. In other words, our activity should primarily consist in a reduction in and compensation for the impact of watercourse adjustments already conducted and of navigation already taking place. Aquatic species and species of natural habitats bound to water have been assessed the worst in national monitoring for years (Chobot a kol. 2013). This means that they are the most affected by negative changes and that the Czech Republic should particularly strive to improve this situation. It should not be forgotten that the idea of the D-O-E plan arose in times of different social priorities. Today however, the situation is completely different, whether in terms of economy, the environment or climate change.

Environmental legislation (especially requirements of the Habitat and Bird Directives, the Water Framework Directive, the Nature and Landscape Protection Act, etc.) has a fundamental impact on the feasibility of the project and should be thoroughly evaluated prior to further considerations on how realistic and necessary a D-O-E is. Conflict with the objectives of European nature conservation directives is one of the most important limits of the project, but this is just the tip of the iceberg. There is no need to specify these conflicts or make prognoses (as has been done in parts of the study dealing with expected economic benefits of the project and the development of the demand for shipping, not always based on well-founded assumptions), as they are determined by legislation. Nevertheless, they have not been evaluated in relation to the project’s feasibility.

In this respect, international conventions on environmental protection should not be overlooked either. Although these so-called multilateral environmental agreements may be seen as instruments not reaching the force of legislation, they form a full part of the Czech legal order. An example of an agreement with a direct link to the D-O-E project is the Ramsar Convention, but also the Bern and Bonn Conventions and the Convention on Biological Diversity must be mentioned. The mission of these documents should certainly not be interpreted in a way arguing on the one hand that the Czech Republic as a contracting party has complied to them and on the other hand making steps leading to a realisation of the D-O-E connection.

Assessment of the feasibility study

The basic prerequisite for meeting the objectives of a feasibility study is quality workmanship and independency in its evaluation. The credibility of the compiled study detracts, among other things, from the fact that separate parts are not interconnected, i.e. in different places often different information on the same subject can be encountered and the contents of some passages is rather surprising when compared to their titles. For example, Part A of the study, which should deal with the possible alternative ways of achieving the project objectives, is rather a

summary of the project’s benefits for carriers and declarations of those involved in the realisation of the D-O-E connection, which does not answer the question whether and to what extent objectives in transport policy can be achieved by other means than by realisation of the D-O-E project, which would irreversibly damage many components of the environment. The D-O-E project study promotes mostly ill-founded assumptions on flood prevention, recreation, and even water management and adaptation to climate change. Neither the economic calculations are very persuasive. On the contrary, its prefers documents which contain information on the D-O-E project and create the impression that the Czech Republic has committed itself to realisation of the river connection or has been imposed some kind of legislation or international agreement (European Agreement on Main Inland Waterways of International Importance, AGN). That is however a completely misguiding interpretation.

Another prerequisite for meeting the objectives of a feasibility study is a thorough evaluation of all available information. By the way, we deal with a feasibility study, not a search of available literature, so it is not an exaggerated demand to expect qualified conclusions regarding the feasibility of the project. A part indicated ‘B.5’ deals, on ca 1400 pages, with the impacts of the D-O-E connection on the environment. These are, although not exhausting (e.g. an assessment of the impact on farmland is missing; the aspect of ecosystem services and the influence on them, neither their inclusion into the economic balance are evaluated in the document; impacts on e.g. Poodří Protected Landscape Area and the UNESCO Biosphere Reserve at the confluence of the Thaya and the Morava are not comprehensively described, only a concluding assessment of the impact on the water regime of the landscape, etc.), in many cases correctly evaluated as serious or even as non-compensable, and are thus a clear proof of the severity of the impacts of the D-O-E project on the environment. Nevertheless, this part is not adequately reflected in the ‘Conclusions’ chapter or in the risk analysis or SWOT analysis. The D-O-E Association has therewith omitted obvious conclusions which are essential for the realisation of the project.



Gravel deposits in the Oder river in Poodří Protected Landscape Area. Photo Zdeněk Patzelt

It is thus the question whether the study can serve as a foundation for a government decision on the meaningfulness and feasibility of the project, now that it mentions the risks which can essentially jeopardise the project on the one hand, but does not find the will to accept and interpret this information in key passages. If these environmental risks had been taken into account, general conclusions in favour of the D-O-E connection would have been practically impossible.

An abstract of the feasibility study was submitted for an interdepartmental comment procedure in January 2019. Even on the significantly reduced number of 167 pages, the material has almost the same shortcomings as the study itself: particular parts are again not interconnected and the environmental impacts are rather mentioned as a minor factor posing a certain risk in the form of difficult enforcement with regard to the professional sector and in permit procedures. In a motion for a resolution, the Ministry of Transport has proposed performing a Strategic Environmental Assessment (SEA) process. Besides the fact that this material is dedicated to a single project and deals with reasons why the project should be realised, and is thus not a strategy but de facto

project documentation, there is hardly any justification for a SEA process also because serious environmental impacts of the D-O-E project are already known today, among others based on the observations in the relevant part of the feasibility study (although not adequately evaluated from the perspective of feasibility). Performing a SEA process at this moment would only be another waste of public funds.

The most important thing is still to come

The task from the Spatial Development Policy ordering the Ministry of Transport to summarise and assess available documents on the feasibility of the D-O-E project still remains unfulfilled three years after it was formulated. Although compiling a feasibility study was a logical and justified choice, the final study cannot be characterised this way, inter alia because it basically misses environmental risks. It will now be essential which position to the study the Government will take after evaluation of the interdepartmental comment procedure. But that is unknown at this moment.

A list of references is attached to the web version of the article at www.casopis.ochranaprirody.cz

Update of the Conception for Unblocking the Czech River Network

Zdeněk Vogl

This year, already a second update of the Conception for Unblocking the Czech River Network, an important water management planning document, will be completed. At present, the Czech Nature Conservation Agency is working on a proposal delineating watercourses which are primarily determined to be made passable for migration, at the same time respecting territorial and species protection.

For this reason, the length of corridors will generally increase as compared to the present situation. These will be prioritised in the subsidy policy also in future. The objective of the updated version of the document is to implement measures providing free migration to fish and other water animals in an effective and systematic way, especially on watercourses of international and national importance.

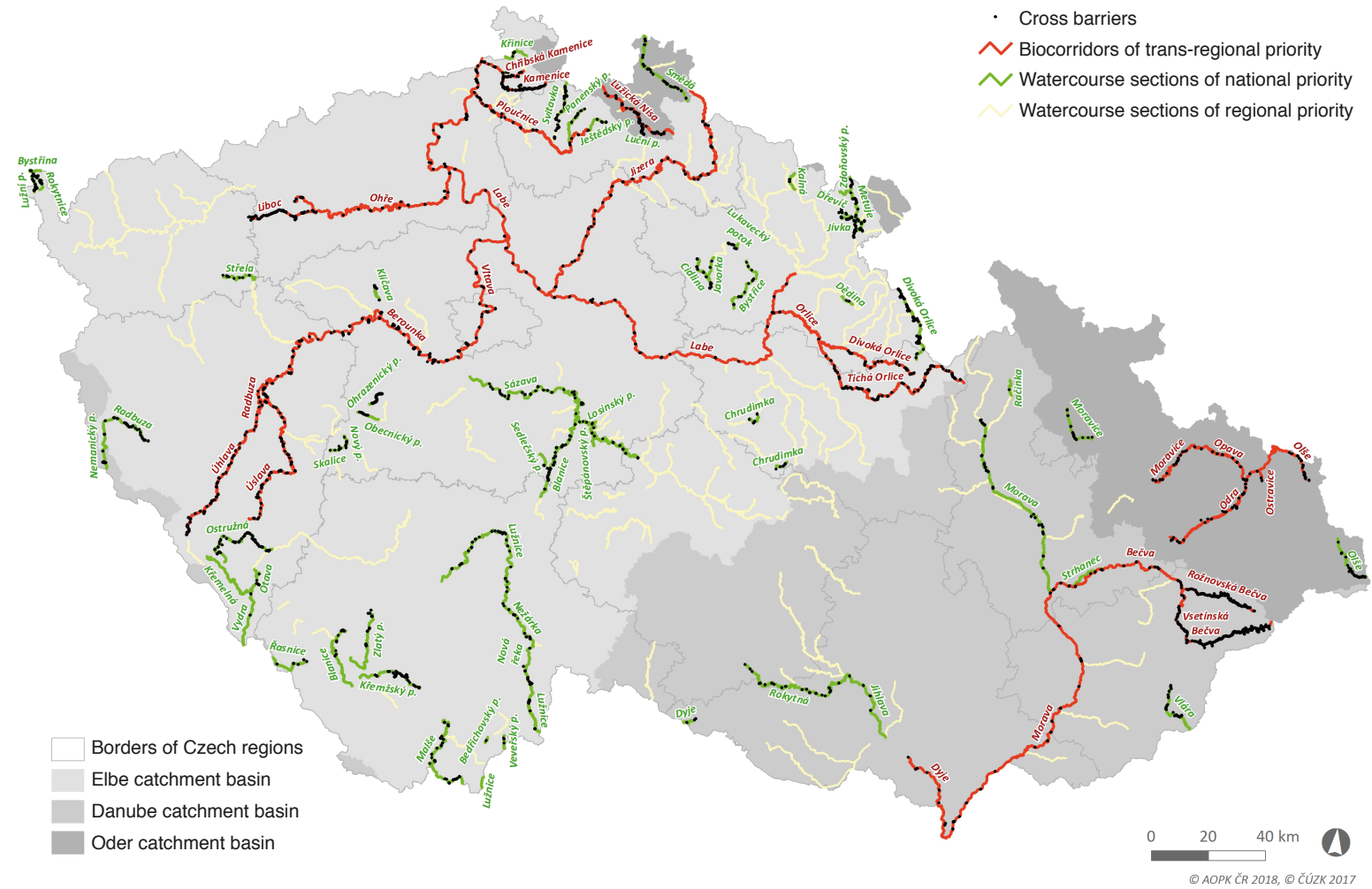


Figure 1. Delineation of corridors of international, national and regional priority in the updated Conception. Compiled by Jan Vrba