

**Comments of the Ministry of Transport, Construction and Regional Development of the
Slovak Republic**

to the Proposal of Protocol of Sustainable Transport

**to the Framework Convention on the Protection and Sustainable Development of the
Carpathians**

Chapter III

SPECIFIC ACTIONS

Article 12

Water Transport

The Ministry of Transport, Construction and Regional Development of the Slovak Republic (MoTCRD) requests, that the initial text will be replaced by following text.

1. Parties respect:
 - a) Potential of waterways for economic development of the country including tourism,
 - b) Potential of waterways for freight and passenger transport in the Carpathian region.

2. Parties respect concrete negative impacts caused by water transport like emissions of pollutants and noise, devastation of nature and half-nature biotopes, fragmentation of river ecosystems and furrows. Yet in comparison with other transport ways is water transport considered as the most ecologic alternative and economically most effective transport way among all transport modes, what importance need to be placed on.

3. Parties will accept measures for support of sustainable development of water transport, namely by:
 - a) Optimization and modernization of existing transport infrastructure,
 - b) improving of multimodal connections and by the development of intelligent infrastructure - by integration within multimodal transport systems,
 - c) innovations of vessels and their adaptation to technical progress in regard to environment,
 - d) support for the transfer of freight transport to rail and water transport within the targets set in the EU (e.g.in the WhitePaper on Transport).

Chapter IV

IMPLEMENTATION, CONTROL AND EVALUATION

The Protocol falls under the competence of the Ministry of Environment of the Slovak Republic (ME SR), in particular the negative impact of transport on the environment. Therefore it is needed to accentuate and ensure, that obligations arising from Chapter IV (creation of working groups, reporting on implementation, etc.) will fully stay in competence of ME SR and the MoTCRD SR will only elaborate basis for listed materials.

Chapter IV

IMPLEMENTATION, CONTROL AND EVALUATION

Article 21

We recommend adopting an abbreviation for the “Conference of the Parties of the Carpathian Convention”.

JUSTIFICATION

ICPDR requirement is consistent with the general program of the EU transport policy, formulated in the basic acts aimed to the development and promotion of inland waterway transport related to specific measures and objectives. Our comments concerning to the general principles are essential for reaching of mentioned objectives. Further, the comments are consistent with the principles of environmental protection and water directives. We are participating in activities of the international association ICPDR (just these days held in Zagreb) where is seeking the conjunction of interests in the field of an inland navigation, water system and energy for achieving a common approach in the use of rivers with the interests and requirements of nature conservation and protection of the Danube represented by association ICPDR . The opinion to the "Draft Protocol on sustainable transport to the Framework Convention on the Protection and Sustainable Development of the Carpathians“ respects all principles of cooperation based on a common platform of river commissions as Danube Commission and Sava Commission together with the ICPDR and therefore we see no reason to modify our original opinion.