

Annex 1: Comments received via the Internet questionnaire

1	the activities and responsibilities of agriculture, industry, urban and environmental planning should all contribute to the protection of our natural resources such as living in responsible interrelation (and sustainable harmony) with our rivers, coasts and water sites.
2	As I understand, no risk criteria are set; countries are free to determine whether areas are safe enough or whether extra measures are necessary. I think you should consult the people on this issue: do we agree that the directive only asks a certain efforts of member states and does not set the standard/criteria for safety and investments to make.
3	The insurance industry and Flood Liaison and Advice Groups in Scotland have had a significant effect in managing flood.
4	Real cooperation with local stakeholders is needed, their knowledge being fundamental in setting up and implementing procedures. A bottom up approach and screening of existing legislations are to be preferred. Stakeholders should be part of the elaboration of plans from the early stage to the final application.
5	There is no need for a close link between WFD and a Flood's Directive (FD). Timeframe of the WFD is not realistic. Use the well known expression "Flood Action Plan" instead of "Flood Risk Management Plan". It is mandatory not to hinder the implementation of already existing FAP. There is no need for very expensive Flood Risk Maps in most cases.
6	Cf. la note de position des autorités françaises transmise par leur représentation permanente ce jour.
7	Your form did not allow us to express reasons for our view. Please email if you wish to have this information.
8	Concerning Question 5: It is not logical that coastal areas with a flood risk should be assigned to the nearest or most appropriate river basin. We suggest assigning them to the sea because the damages are caused by the sea and not by the river basin.
10	To improve flood tools in order to do the management of flood tasks
11	The phrasing of questions is imprecise making it difficult to respond to questions 3 & 10 sensibly. See email to Adrienne Van-der-Sar and env-water@cec.eu.int for more detailed comments.
12	All the analysis is focusing on surface water - it omits the considerable local role of groundwater and geology. Groundwater acts as a buffer with specific, and highly variable dynamics related to local geological and topographic conditions.
13	Mister Helmut Blöch get this text per E-mail. E-Mail: helmut.bloech@cec.eu.int.
14	We will be submitting a consultation response to env-water@cec.eu.int explaining the basis for our answers.
15	The responses can be clarified by the Dutch delegation to the Stakeholder meeting.
16	We would like to draw your attention to the potential of mobile barriers for flood protection. Introducing them in an overall strategy should be done in an early stage of planning as they may offer a quite different approach to the problem. We will shortly send a separate letter highlighting this topic.
17	Separately submitted by email on 13/9/05 to env-water@cec.eu.int.
18	At this point, I receive the message 'max number of characters exceeded' - again implies lack of any real interest in responses received.
21	We are concerned that there is no reference in the questionnaire to urban flooding and the relationship with flood protection measures in a catchment. Flood prevention schemes can result in localised drainage problems.
22	In general, we want less derogation possibilities, stricter timetables, more precautionary principle use.
24	Comment to the question Q8: There are already settled procedures and a long

	tradition of transboundary cooperation on water management with countries beyond the boundaries of the EU. Bilateral agreements are a good way also to deal with flood issues, so mandatory planning obligations based on the Floods Directive are not needed.
26	I could not submit comments here as I received the message "max number of characters exceeded" (number not given)
28	We find that the principle of solidarity also means that member states try to take measures which contribute to a reduction of flooding problems in neighbouring states. The directive should therefore recommend that the riparian states look for a policy that gives the largest common effectiveness.
29	Re.Q11: Note that the timeframe for implementation of the FRMD must neither be flexible nor be set at the regional level. it must be is compatible with the timeframe for implementation of the WFD.
31	This field has been limited to a certain number of characters, and I've been unable to submit the questionnaire with the necessary text. The above responses are subject to a number of caveats that must be considered in evaluation. The full text that was intended for this field will be submitted by email to Ms Van Der Sar.
34	to Q3: It may be necessary to get retention in areas with low risk of damages to diminish damages in areas with high risks. to Q11: Time schedules should be set in the case of river basins shared between several Member States.
40	Organisational, political, social, communication aspects should be given more space in the questionnaire (and the directive perhaps). Flood maps "should increase of public awareness etc" is too simple a statement. There is much in between maps and awareness and there is much besides maps in effective communication.
41	To improve common flood tools in order to do the management of floods task
43	Flood management should be linked to the agricultural policy.
45	Land use management at catchment level must be factored in to dynamic and regularly updated flood risk maps, as risks change with land use in each catchment. This can also be iterative process used to discourage catchment level land use changes that are likely to increase the risk of flooding and to promote appropriate strategic planning.
49	Consider this to be a poor example of a consultative process using a closed questionnaire with no real opportunity to expand upon the rationale which underpins the response to each question.
50	Flood risk measures (mapping, management plans) have to respect the rights of property. The owners have to be informed and consulted at an early stage. Measures have to be implemented together with them.
58	Instead of linking coastal flooding zones to the nearest river basin, they can also be seen as distinct (cross-boundary) areas. A uniform set of calculations for all the flood zones in Europe is technically and socially not the most wanted solution. Their must be possibilities to understand the differences between methodologies.
59	to simple. We don't need a new Flood Directive to regulate trivially things. Important Points are - clearly interfaces to spatial planning - clearly restrictions to further increase of the damage potential in flood risk areas (no money from different EU support programmes)
60	The options to answer questions 3 and 10 are imprecise. Please read together with submission made to env-water@cec.eu.int and Adrienne.van-der-Sar@cec.eu.int
61	It has forgotten the role of forests.
64	The options to answer Question 3 and 10 are imprecise. Q3: We do not support the introduction of wholesale exemptions. The application of a derogation on the basis of "no significant risk" could only be justified after a formal risk assessment. Q10: We reject the concept of a "pragmatic link" between this Directive and the WFD as being to weak and open to wide interpretation.

65	We strongly recommend to include the FRM in the time scale and the implementation of the WFD. It should be a part of the WFD.
67	RICS welcomes the initiative of the Commission and is please to have this chance to comment. Generally, we are fully supportive of the approach adopted by the Commission.
70	As there are financial interests to contain floods with concrete, i.e. building dams and dykes, more stringent rules should be set to prevent this way as effectively as possible.
75	Option of NO LEGISLATION - instead guidance is given.
77	It's quiet necessary to use the level of awareness, which is resulting from research and directives like the WFD in a new flood directive. This avoids a lot of "double work", saves money and dissatisfied citizens.
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87	The directive should foresee a substantial investment in research to understand running water systems that will allow predictive planning. We need a new profession of environmental river engineers.
88	I agree with the proposals outlined in Q2, 3, 4, 5, 6, 10 and 11 if the words 'Floods Directive' were replaced by 'arrangements'. The case for a heavy, legal Directive is simply not made. The Action Plan outlined in COM(2004)472 should be implemented on the basis of voluntary adoption of best practice.
89	It is important that the geological perspective of surface water flooding is recognised in the proposed Directive. It is important the Groundwater Flooding is explicitly included in the proposed Directive.
91	I heard nothing about costs of the projects to reduce risks. We believe that avoided risks should be in balance with the investment and maintenance costs of these projects (benefit-cost analysis). Of course environmental impact assessments and other instruments can also play an important role in the decision making but a social benefit cost analysis should be the basis.
94	Flood prevention should take place several steps before flooding or planning of flood-prevention e.g. environmental pollution with greenhouse-gases to avoid climate changes.
96	You have to promote not only protection but also mitigation, to avoid more people and companies in the flood plain when it is possible to live out of the flood plain, to promote risk reduction in every company, every public property and every housing as it exists for fire prevention, with the help of insurance.
103	How does this directive consider synergy effects with soil protection treatment and natural reservation areas?
105	I'm a researcher in the field of flood forecasting and risk assessment. I think that could be important to introduce a rule that obliges everything falls into a flood risk area to submit an insurance policy. This could be a way to reduce private and public losses caused by a flood and to un - encourage the construction of new buildings, plant, and so on in flood risk area.
108	I would prefer to see greater directions on Europe wide flood defence standards rather than setting the level of protection at a local regional level. Existing flood plain communities must be sustainable and so should be able to attract inward investment. Investors need to understand flood risk and will be attracted to those areas enjoying a higher standard of protection.
111	European funds could be set up to co-finance crossing borders river basin projects aiming at flood alleviation. These funds should aim at projects that invest in measures that have an impact on the both sides of the border. Thus countries can be stimulated to invest in measures that are substantially or mainly effective in minimizing flood damage risks in their neighbour country.
116	An aim of the Action should be prevention and protection also from potential risk generated by human activity, this has to be regulated everywhere. The insurance

	cover should not be only charged to the individuals at risk, the principle of solidarity should be applied instead moreover usually the ones at risk are not the ones that generate it.
121	Co-fund of flood risk management measures from the EU budget - Full compliance with the Water Framework Directive (WFD) - public participation must be positioned in Floods Directive - strong linkage with land use planning.
124	Please stop working on the flood-directive and put the water framework directive out of force.
125	Specifically, I would like a new Floods Directive to be proactive in limiting new build projects on known flood plains.
127	The geoscientific part must be included. It is crucial if the flooding will be serious - i.e. if the ground will act like a sponge or seal (depending on porosity of soils, type of bedrock and joints etc.)
129	Why do you waste your time on a flood-directive? We just don't need it, like we really don't need the water framework directive. You are working on nonsense and destroying the competitiveness of our enterprises. There are a lot of really more important problems to solve like unemployment. Please take care about the real problems!
135	Please keep in mind that only by taking a catchment approach can flooding be managed. That is, even if areas do not flood they may be integral to the flood processes. For example: floods arise in the head waters but often their effects are felt in the lowlands. To deal with floods effectively we must manage the causes first and the effects second.
138	Up to me, it would be safely that this directive's project aims preventives actions, limiting origins of floodings (agriculture, urbanisation, etc.). Regional measures (dykes) would increase risks for upstream and downstream neighbours.
146	The new Management unit which will be established should have equal representation of experts from all Member States and accession countries. It should coordinate and facilitate the training of additional flood management experts at the local level, especially in accession countries, where such experts are lacking.
149	Spend more money and efforts on preventing climate change, which is the most significant cause for the threat of severe floods, and less on adaptation strategies. All flood risk management plans should make reference to reducing greenhouse gas emissions as a key measure to reduce flood risk. This would also increase acceptance of measures aimed at reducing greenhouse gas emissions.
151	* Important to involve several surveys and authorities in the society in the questions and work with flood risks, that is for example meteorology as well geology knowledge and investigations.
152	In point "2) Scope of a future EU Floods Directive", it would be important to clearly define what is a minimal risk of damage to people, property and/or environment. If not, it could allow Member States not to take action in certain cases.
153	We do not need a Floods Directive and even no Water Framework Directive in Europe. The best option would be to stop working on these legislations, to eliminate all draft documents for them and to fire the people working on it. In these days the Commission should consider about the Lissabon-agenda and not about not necessary legislation. It is really time that the Commission starts working for the European People and not against them. Please keep in mind how the French and Dutch people think about the European administration. Be sure that if we Germans were allowed to have a referendum we would have elected the same way.
154	Regarding Q11: the flexible timeframe has to be set in a way that ensures, that efficiency of the Floods Directive will not get lost due to too flexible time schedules.

156	If there is a risk for people or economic installations, don't forget the public necessity to let the confinement on suspicion labours be done. In France the mayor of a city can stop the process if he has an other point of view about people interest. As well a private proprietor can stop the process if he think that he will loose too much money.
158	These matters cannot be separated from a country to another. The directives should contain measures for territorial / local management and development only in respect with mandatory provisions. If it the case, few or many countries could be financial help to reorganize administrative and urbanistic centres, not only in perspective of such directives but also taking in consideration other objectives that can influence not only a region.
159	To build up an alarm system with a specific standard based on weather forecasts is necessary in all countries in Europe.
160	<p>Some comments and clarifications to our answers in questions 2, 3, 6, 9, 10 and 11: Question 2 - Yes, through the WWF network Question 3 - We believe that the scope of the "Flood Risk Management Directive" (FRMD) should not allow blanket exemptions (opt-outs) for producing hazard and risk maps. Such exemptions raise concerns over what will be the criteria to define and justify (this is now done on the basis of the flood hazard maps and/or flood risk maps) that the risk is now low and that this will not change in the future. Concerns are also raised over the fact that – unless strong criteria are developed - such "opt-outs" could be abused. The FRMD should always require a minimum hazard and damage mapping allowing for further risk-based prioritisation as determined by density and other data, identifying areas for which risk management plans are necessary, to inform planning and others appropriately. The complexity/accuracy of the models used to produce this information should be directly proportional to the possible damage entailed. Most important is that there should not be any "white" spots on the European maps, as land-use developers and citizens need/have the right to know the hazards and risks and the related uncertainties. This could be part of the WFD Article 5 River Basin District characterisation over 2006-2008. Question 6 - (Similar to Q3). Any flood maps should contain information about areas for natural floodplain storage and areas that can serve as retention/buffer at present or in the future. Maps should not exclude undeveloped areas that could flood naturally (e.g. floodplains) as if these are not shown - or other appropriate strategies are not considered – they could be targeted for development. This would then place new assets at risk and result in loss of (water) storage, increasing flooding frequency and volume downstream. Understanding of these areas is fundamental for sustainable flood risk management and should be a basic requirement. It is, thus, important that a "no-deterioration" provision applies to them so risks do not increase. Where information on these areas is unknown, and detailed investigation is not justified on the basis of low risk to people/property, it could be assumed that the whole floodplain should be included. Question 9 - Existing structures can be used provided that they are assessed and reviewed in order to ensure that they allow linking FRM and water management - as intended by the Action Programme. The FRMD should not have an "opt-out" for existing flood action plans but a "transitional provision" requiring these to be assessed and reviewed to ensure that they are aligned to and eventually meet the provisions of the FRMD by 2015 at the latest. Question 10 - A "pragmatic link" between the FRMD and the WFD is not enough. We must achieve full integration between the two Directives as this is the most efficient, cost-effective and sustainable way to proceed in the development of any measures to manage flood risk that could have an effect on the achievement of the WFD objectives. This relates to FRM measures in the areas of "Prevention", "Protection", "Recovery and lessons learned" because many of these could have a potential impact/effect on the achievement of WFD's "no-deterioration" and/or "good ecological, chemical and quantitative status" objectives. As a result, and following the "full integration" principle, these</p>

	measures should be developed as part of the WFD's Programmes of Measures and River Basin Management Plans to ensure they meet all the relevant WFD integrated river basin management requirements. Any potential flood risk management measure with a negative impact on the status classification for surface and groundwater must respect the WFD's Article 4 exemption criteria before being carried out. No new, automatic or blank exemptions should be established through a FRMD. Question 11 - The timeframe for implementation of the FRMD must neither be flexible nor be set at the regional level (otherwise it would defeat the object of linking FRM to water management). What it must be is compatible with the timeframe for implementation of the WFD. If "synchronicity" between the implementation of the two Directives cannot be achieved prior to 2015, this should then be the deadline from which it must happen provided that "no further deterioration of current status" – as could be caused by some FRM measures – takes place in the interim (from the moment the FRMD enters into force) and hence that WFD exemptions are respected.
166	The role of aquifers and regional geology appears to have been overlooked so far in the preparation of the EU Flood Action Programme. The overflow of aquifers, and the discharge of groundwater into surface waters can, depending on the local geology, be a major cause of flooding as documented by the extensive studies and models prepared after the recurrent floods in the Somme estuary in France (2000-2001) and the new knowledge summarised in a report published by the French Senate (www.senat.fr/rap/r01-034-11.html). The importance of understanding and managing the linkages between surface and groundwater needs to be reflected in the future Action Programme.
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172	Not only plans, but prevention (eg. no construction in floods areas, to let water percolate into the soil, ...)
173	Z am a member of the European Federation of Geologists expert group on natural hazards what is ready to contribute in the forming of Directive. I propose to see a geological initiative work about the alluvial plains of Europe as well: http://www.regione.emilia-romagna.it/geologia/e_pianall.htm
177	I found question 3 ambiguous. There is a danger when setting level of risk at regional level since some regions may consider similar risks differently. The planning and coordination should of course be set at regional level to allow a rapid pace of action but in my opinion the levels of risk need to be defined and agreed at EU level and the correct level of risk applied at local level with checks made from EU representatives.
179	I am a member of the European Federation of Geologists expert group on natural hazards
180	I filled this questionnaire as a member of the European Federation of Geologists expert group on natural hazards. I would propose GIS information on the flood risk, the scale should be 1:25 000 or even larger.
181	leave regulation to region, no eurean wide regulation
185	Please don't spend money on places where there are no flooding: it is easy to see when there is a problem and more difficult to find a solution but it seems to be even more difficult to say that in some places there is no problem or minor ones and no money should be invested. The aim is to give money where it is needed: so please choose to classify as precisely as it is possible the degree of risks (runoff, flooding, mood linked to road, houses, people at risk...). For more

	details, you may contact me: dauffret@laposte.net
186	Q4: Sorry, I really don't know the alternatives for coastal flood management (I can imagine a local management but...)??? Q10: How could be possible to disagree ?????
187	It is very important to include activities such: education, public awareness, implementing of environmental requirements to the business, etc. The human activities - non-environmental business, destruction of nature, etc. are the reason for floods. The best solution will be to include the above activities in the Floods Directive. Otherwise it will be just the next paper that the authorities will put in the 'round file' (waste bin).
189	Coordination across the whole river basin is very desirable, but lack of agreement cannot be a reason to postpone single actions. The questionnaire only asks the level of agreement/disagreement with a number of approaches, without showing any alternatives.
190	Timeframes should be developed locally and reviewed at national or EU level to ensure some consistency with the overall needs and proportionment of what are likely to be scarce resources to manage and make necessary changes in response to the risk. Identifying flood areas is important and those using the areas for work/living/recreation must be made aware of the risk but not in any way encouraged to continue their activity at the cost of the nation/eu. This must be wholly at their own risk and cost.
194	Any Floods Directive should avoid being too prescriptive and resulting in unnecessary bureaucracy.
196	Q4: I agree for the river basin, but I disagree for the Coastal area; for that the management unit should be a separate entity.
205	I prefer a global EU Directive in coordination and with subsidiary to the EU countries. There should be a difference between the actions to river and coastal prevention for flood protection.
206	To Q1: DEF in fact cannot be grouped into the categories listed. It is not a single NGO but a network of more than 160 NGOs in 13 danubian countries, and it is not operating at European, but international Danube riverbasin level. To Q2: I participated as an observer to the FP EG of ICPDR on behalf of DEF - so at Danube level the answer would be yes. To Q9 - I think that using existing structures "as much as possible" could - and would - cause using structural FP measures to a much bigger extent than ecologically optimal and economically needed. Existing structures must be reviewed and used only if it is the only feasible or best practice to use them. Also the often rather technically minded cross-border agreements have to be renewed (taking e.g. WFD objectives into account). Non-structural FP measures should be prioritized and used to as much extent as possible.
208	In question 5 flood risks of inland waters and coastal waters seem to be seen as similar. On coasts flood can be caused by high tides and/or storm. That is different from floods on rivers or lakes, which are caused by heavy rain falls and/or ice/snow melting so that there is too much water, for which is not enough space in the normal river bed. This different quality should be reflected in the directive. With regard to question 9: Already existing flood protection plans on national or international basis, which have been or are being implemented, should not be endangered. That would be a step back. Should they have to be adapted to the new directive? If yes, there should be long enough transition periods.
218	Q5 Flood response should be organized on larger management units, such as large rivers or geographic areas, in order to better manage resources and coordinate actions in case several floods happen at the same time, at short intervals, or at different times of the year.
236	Why is nothing mentioned about a cross disciplin approach to Flood notification, and why does this not take into account the effects of the impact by other ecosystem changes, other than river basin, for exemple, planning in local flood

	prevention measures, and deforestation
237	<p>Re. Answer to Q3: Note that the scope of the “Flood Risk Management Directive” (FRMD) should not allow blanket exemptions (opt-outs) for producing hazard and risk maps. Such exemptions raise concerns over what will be the criteria to define and justify (this is now done on the basis of the flood hazard maps and/or flood risk maps) that the risk is now low and that this will not change in the future. Concerns are also raised over the fact that – unless strong criteria are developed - such “opt-outs” could be abused. The FRMD should always require a minimum hazard and damage mapping allowing for further risk-based prioritisation as determined by density and other data, identifying areas for which risk management plans are necessary, to inform planning and others appropriately. The complexity/accuracy of the models used to produce this information should be directly proportional to the possible damage entailed. Most important is that there should not be any “white” spots on the European maps, as land-use developers and citizens need/have the right to know the hazards and risks and the related uncertainties. This could be part of the WFD Article 5 River Basin District characterisation over 2006-2008.</p> <p>Re. Answer to Q6: Note answer to Q3 above. Note also that any flood maps should contain information about/show areas for natural floodplain storage and areas that can serve as retention/buffer at present or in the future. Maps should not exclude undeveloped areas that could flood naturally (e.g. floodplains) as if these are not shown - or other appropriate strategies are not considered – they could be targeted for development. This would then place new assets at risk and result in loss of (water) storage, increasing flooding frequency and volume downstream. Understanding of these areas is fundamental for sustainable flood risk management and should be a basic requirement. It is, thus, important that a “no-deterioration” provision applies to them so risks do not increase. Where information on these areas is unknown, and detailed investigation is not justified on the basis of low risk to people/property, it could be assumed that the whole floodplain should be included.</p> <p>Re. Answer to Q9: Note that existing structures can be used provided that they are assessed and reviewed in order to ensure that they allow linking FRM and water management - as intended by the Action Programme (see section 7 above). Similarly, the FRMD should not have an “opt-out” for existing flood action plans but a “transitional provision” requiring these to be assessed and reviewed to ensure that they are aligned to and eventually meet the provisions of the FRMD by 2015 at the latest.</p> <p>Re. Answer to Q10: Note that a “pragmatic link” between the FRMD and the WFD is not enough. What must be achieved is full integration between these Directives as this is the most efficient, cost-effective and sustainable way to proceed in the development of any measures to manage flood risk that could have an effect on the achievement of the WFD objectives. This relates to FRM measures in the areas of “Prevention”, “Protection”, “Recovery and lessons learned” because many of these could have a potential impact/effect on the achievement of WFD’s “no-deterioration” and/or “good ecological, chemical and quantitative status” objectives. As a result, and following the “full integration” principle, these measures should be developed as part of the WFD’s Programmes of Measures and River Basin Management Plans to ensure they meet all the relevant WFD integrated river basin management requirements. Any potential flood risk management measure with a negative impact on the status classification for surface and groundwater must respect the WFD’s Article 4 exemption criteria before being carried out. No new, automatic or blank exemptions should be established through a FRMD.</p> <p>Re. Answer to Q11: Note that the timeframe for implementation of the FRMD must neither be flexible nor be set at the regional level (otherwise it would defeat the object of linking FRM to water management). What it must be is compatible with the timeframe for implementation of the WFD. If “synchronicity” between the implementation of the two Directives cannot be achieved prior to 2015, this should then be the deadline from which it must happen provided that “no further deterioration of current</p>

	status” – as could be caused by some FRM measures – takes place in the interim (from the moment the FRMD enters into force) and hence that WFD exemptions are respected
243	What about prevention ?
246	<p>Re. Answer to Q3: Note that the scope of the “Flood Risk Management Directive” (FRMD) should not allow blanket exemptions (opt-outs) for producing hazard and risk maps. Such exemptions raise concerns over what will be the criteria to define and justify (this is now done on the basis of the flood hazard maps and/or flood risk maps) that the risk is now low and that this will not change in the future. Concerns are also raised over the fact that – unless strong criteria are developed - such “opt-outs” could be abused. The FRMD should always require a minimum hazard and damage mapping allowing for further risk-based prioritisation as determined by density and other data, identifying areas for which risk management plans are necessary, to inform planning and others appropriately. The complexity/accuracy of the models used to produce this information should be directly proportional to the possible damage entailed. Most important is that there should not be any “white” spots on the European maps, as land-use developers and citizens need/have the right to know the hazards and risks and the related uncertainties. This could be part of the WFD Article 5 River Basin District characterisation over 2006-2008. Re. Answer to Q6: Note answer to Q3 above. Note also that any flood maps should contain information about/show areas for natural floodplain storage and areas that can serve as retention/buffer at present or in the future. Maps should not exclude undeveloped areas that could flood naturally (e.g. floodplains) as if these are not shown - or other appropriate strategies are not considered – they could be targeted for development. This would then place new assets at risk and result in loss of (water) storage, increasing flooding frequency and volume downstream. Understanding of these areas is fundamental for sustainable flood risk management and should be a basic requirement. It is, thus, important that a “no-deterioration” provision applies to them so risks do not increase. Where information on these areas is unknown, and detailed investigation is not justified on the basis of low risk to people/property, it could be assumed that the whole floodplain should be included. Re. Answer to Q9: Note that existing structures can be used provided that they are assessed and reviewed in order to ensure that they allow linking FRM and water management - as intended by the Action Programme (see section 7 above). Similarly, the FRMD should not have an “opt-out” for existing flood action plans but a “transitional provision” requiring these to be assessed and reviewed to ensure that they are aligned to and eventually meet the provisions of the FRMD by 2015 at the latest. Re. Answer to Q10: Note that a “pragmatic link” between the FRMD and the WFD is not enough. What must be achieved is full integration between these Directives as this is the most efficient, cost-effective and sustainable way to proceed in the development of any measures to manage flood risk that could have an effect on the achievement of the WFD objectives. This relates to FRM measures in the areas of “Prevention”, “Protection”, “Recovery and lessons learned” because many of these could have a potential impact/effect on the achievement of WFD’s “no-deterioration” and/or “good ecological, chemical and quantitative status” objectives. As a result, and following the “full integration” principle, these measures should be developed as part of the WFD’s Programmes of Measures and River Basin Management Plans to ensure they meet all the relevant WFD integrated river basin management requirements. Any potential flood risk management measure with a negative impact on the status classification for surface and groundwater must respect the WFD’s Article 4 exemption criteria before being carried out. No new, automatic or blank exemptions should be established through a FRMD. Re. Answer to Q11: Note that the timeframe for implementation of the FRMD must neither be flexible nor be set at the regional level (otherwise it would defeat the object of linking FRM to water management). What it must be is compatible with the timeframe for</p>

	<p>implementation of the WFD. If “synchronicity” between the implementation of the two Directives cannot be achieved prior to 2015, this should then be the deadline from which it must happen provided that “no further deterioration of current status” – as could be caused by some FRM measures – takes place in the interim (from the moment the FRMD enters into force) and hence that WFD exemptions are respected.</p>
250	<p>Re. Answer to Q3: Note that the scope of the “Flood Risk Management Directive” (FRMD) should not allow blanket exemptions (opt-outs) for producing hazard and risk maps. Such exemptions raise concerns over what will be the criteria to define and justify (this is now done on the basis of the flood hazard maps and/or flood risk maps) that the risk is now low and that this will not change in the future. Concerns are also raised over the fact that – unless strong criteria are developed - such “opt-outs” could be abused. The FRMD should always require a minimum hazard and damage mapping allowing for further risk-based prioritisation as determined by density and other data, identifying areas for which risk management plans are necessary, to inform planning and others appropriately. The complexity/accuracy of the models used to produce this information should be directly proportional to the possible damage entailed. Most important is that there should not be any “white” spots on the European maps, as land-use developers and citizens need/have the right to know the hazards and risks and the related uncertainties. This could be part of the WFD Article 5 River Basin District characterisation over 2006-2008.</p> <p>Re. Answer to Q6: Note answer to Q3 above. Note also that any flood maps should contain information about/show areas for natural floodplain storage and areas that can serve as retention/buffer at present or in the future. Maps should not exclude undeveloped areas that could flood naturally (e.g. floodplains) as if these are not shown - or other appropriate strategies are not considered – they could be targeted for development. This would then place new assets at risk and result in loss of (water) storage, increasing flooding frequency and volume downstream. Understanding of these areas is fundamental for sustainable flood risk management and should be a basic requirement. It is, thus, important that a “no-deterioration” provision applies to them so risks do not increase. Where information on these areas is unknown, and detailed investigation is not justified on the basis of low risk to people/property, it could be assumed that the whole floodplain should be included.</p> <p>Re. Answer to Q9: Note that existing structures can be used provided that they are assessed and reviewed in order to ensure that they allow linking FRM and water management - as intended by the Action Programme (see section 7 above). Similarly, the FRMD should not have an “opt-out” for existing flood action plans but a “transitional provision” requiring these to be assessed and reviewed to ensure that they are aligned to and eventually meet the provisions of the FRMD by 2015 at the latest.</p> <p>Re. Answer to Q10: Note that a “pragmatic link” between the FRMD and the WFD is not enough. What must be achieved is full integration between these Directives as this is the most efficient, cost-effective and sustainable way to proceed in the development of any measures to manage flood risk that could have an effect on the achievement of the WFD objectives. This relates to FRM measures in the areas of “Prevention”, “Protection”, “Recovery and lessons learned” because many of these could have a potential impact/effect on the achievement of WFD’s “no-deterioration” and/or “good ecological, chemical and quantitative status” objectives. As a result, and following the “full integration” principle, these measures should be developed as part of the WFD’s Programmes of Measures and River Basin Management Plans to ensure they meet all the relevant WFD integrated river basin management requirements. Any potential flood risk management measure with a negative impact on the status classification for surface and groundwater must respect the WFD’s Article 4 exemption criteria before being carried out. No new, automatic or blank exemptions should be established through a FRMD.</p> <p>Re. Answer to Q11: Note that the timeframe for implementation of the FRMD must neither be flexible</p>

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258	<p>I do not prefer other options, but seeing the delay in implementation of WFD and others EU should intervene more strictly to get the states active in achieving the goals.</p>
260	<p>Re. Answer to Q3: Note that the scope of the “Flood Risk Management Directive” (FRMD) should not allow blanket exemptions (opt-outs) for producing hazard and risk maps. Such exemptions raise concerns over what will be the criteria to define and justify (this is now done on the basis of the flood hazard maps and/or flood risk maps) that the risk is now low and that this will not change in the future. Concerns are also raised over the fact that – unless strong criteria are developed - such “opt-outs” could be abused. The FRMD should always require a minimum hazard and damage mapping allowing for further risk-based prioritisation as determined by density and other data, identifying areas for which risk management plans are necessary, to inform planning and others appropriately. The complexity/accuracy of the models used to produce this information should be directly proportional to the possible damage entailed. Most important is that there should not be any “white” spots on the European maps, as land-use developers and citizens need/have the right to know the hazards and risks and the related uncertainties. This could be part of the WFD Article 5 River Basin District characterisation over 2006-2008. Re. Answer to Q6: Note answer to Q3 above. Note also that any flood maps should contain information about/show areas for natural floodplain storage and areas that can serve as retention/buffer at present or in the future. Maps should not exclude undeveloped areas that could flood naturally (e.g. floodplains) as if these are not shown - or other appropriate strategies are not considered – they could be targeted for development. This would then place new assets at risk and result in loss of (water) storage, increasing flooding frequency and volume downstream. Understanding of these areas is fundamental for sustainable flood risk management and should be a basic requirement. It is, thus, important that a “no-deterioration” provision applies to them so risks do not increase. Where information on these areas is unknown, and detailed investigation is not justified on the basis of low risk to people/property, it could be assumed that the whole floodplain should be included. Re. Answer to Q9: Note that existing structures can be used provided that they are assessed and reviewed in order to ensure that they allow linking FRM and water management - as intended by the Action Programme (see section 7 above). Similarly, the FRMD should not have an “opt-out” for existing flood action plans but a “transitional provision” requiring these to be assessed and reviewed to ensure that they are aligned to and eventually meet the provisions of the FRMD by 2015 at the latest. Re. Answer to Q10: Note that a “pragmatic link” between the FRMD and the WFD is not enough. What must be achieved is full integration between these Directives as this is the most efficient, cost-effective and sustainable way to proceed in the development of any measures to manage flood risk that could have an effect on the achievement of the WFD objectives. This relates to FRM measures in the areas of “Prevention”, “Protection”, “Recovery and lessons learned” because many of these could have a potential impact/effect on the achievement of WFD’s “no-deterioration” and/or “good ecological, chemical and quantitative status” objectives. As a result, and following the “full integration” principle, these measures should be developed as part of the WFD’s Programmes of Measures and River Basin Management Plans</p>

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