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Mr. László GAJDOS
Minister for the Living Environment
Hungary
By e-mail: laszlo.gajdos@aem.gov.hu

Dear Minister,

DSTF wants to bring to your attention our deep concern about the impacts of the bottom sill on the Hungarian Danube built as emergency measure to secure cooling water of the Paks nuclear power station.

The Danube Sturgeon Task Force (DSTF) is a multi-stakeholder platform established to promote sturgeon conservation under EUSDR Priority Area 6 and has status as an observer in the International Commission for the Protection of the Danube River (ICPDR).

The sterlet (*Acipenser ruthenus*) is known to be present but rare in the Hungarian Danube, but it uses the entire Middle Danube stretch between the Gabčíkovo system and the Iron Gates, with the population considered a metapopulation comprising interconnected local groups linked by dispersal and migration. Individuals can move considerable distances along the river, both up- and downstream, making longitudinal connectivity essential for maintaining population exchange. Elevations in river bottom level and flow speed fluctuations are known to impact movement of sturgeons. DSTF is therefore highly concerned that this newly built structure causes significant transboundary impacts by hindering free movement of various life cycle stages of sterlets and thus further reduces genetic exchange of an already very rare fish species of Community Interest.

If the ongoing EIA process should lead to an operating permit, it must remain temporary and have a duration no longer than what is strictly necessary and be subject to regular review, supported by comprehensive monitoring. In particular DSTF calls for evidence clearly demonstrating that this structure remains passable up- and downstream at all water levels for migratory fish species, in particular endangered sterlets and thus therefore does not constitute an obstacle for migration nor for the recovery of the species to a favourable conservation status.

In addition, DSTF calls for alternatives to be assessed, as required by the exemption articles under EU Water Framework Directive (art. 4.7) and the Habitats Directive (art. 6.4), 2)
and the temporary obstacle to be fully removed or adapted to facilitate fish migration at all water levels and all times.

With respect to the monitoring of the impact on sterlet populations, we draw your attention to the specific methods necessary for sturgeon monitoring. Due to their habitat preference, traditionally used fish-monitoring methods seldomly yield sterlet catches.

Therefore, targeted species-specific monitoring approaches are an absolute prerequisite for reliably assessing their presence, population status and habitat use, in line with the Technical Guideline for Sturgeon Population Monitoring. These guidelines were published by the European Commission: Directorate-General for Environment in 2025, and officially recommended for implementation by the Bern Convention with Recommendation No. 223 (2024) of the Standing Committee.
"Technical guideline for sturgeon population monitoring – Support document for the implementation of the pan-European action plan for sturgeons, Publications Office of the European Union, 2025, https://data.europa.eu/doi/10.2779/0450100"

DSTF is also concerned that this newly build structure would also impact the migration of anadromous sturgeons currently not present in Hungary and as any new barrier it thus undermines the restoration of longitudinal connectivity in the Danube as required by the Water Framework Directive and agreed in the ICPDR and the ongoing efforts in this respect to ensure fish passage at the major barriers of Gabčíkovo and the Iron Gates for the anadromous sturgeon species.

In addition to the EU obligations under the EIA Directive, there are obligations under the Danube River Protection Convention (DRPC) to report measures which for reason of their character are likely to cause transboundary impacts. This obligation mirrors similar requirements in the 1992 Helsinki Convention and the 1997 UN Watercourses Convention to which Hungary is also a party. It goes without saying that in order to be meaningful and allow parties to the DRPC and observers to the ICPDR to assess the measures taken, such notification should be given without unnecessary delay as soon as measures are planned. As an observer to the ICPDR we are therefore surprised not to have been informed of any such notification by Hungary with the necessary explanations allowing the parties and observers to assess the potential impacts on them of this measure.

We request that our position can be taken into account in the ongoing EIA process and that you provide the necessary notification and information to the ICPDR so that contracting parties and observers can understand and consider the basin-wide impacts of the planned measures.

Kind regards



Peter Gammeltoft
Chairman of DSTF

Cc State Secretary Ms. Ágnes KELEMEN (agnes.kelemen@aem.gov.hu), Deputy State Secretary Mr. Balasz Horváth (balasz.horvath@aem.gov.hu)