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Prof. DI Christian Schuhböck
Secretary General
Alliance For Nature – Allianz für Natur
A-1160 Wien, Thaliastraße 7
Austria

Dear Professor Schuhböck

IUCN Statement on the infrastructure project “S1 Wiener Außenring Schnellstraße Schwechat – Süßenbrunn” across the National Park Donau-Auen (Austria)

With reference to the letter of the Federal Administrative Court of the Republic of Austria of 15.04.2021 (GZ: W104 2236889-1/8Z) to your organization "Alliance For Nature" and your correspondence with IUCN in connection with the infrastructure project "S1 Wiener Außenring Schnellstraße Schwechat – Süßenbrunn" across the Danube Floodplain National Park, I would like to bring the following to your attention.

IUCN acknowledges **Donau-Auen National Park** as one of the largest wetlands in Europe extending from Vienna to the Slovakian border. Established as a national park in 1996 it is one of the last remaining wetlands in Europe, consisting of a network of riparian forest (65%), water (20%) and meadow (15%). We understand that it was proposed developments including a power-station that resulted in the authorities establishing the park and to maintain its significant values in perpetuity. IUCN subsequently conducted a review of the park's establishment and management in relation to its objectives, confirming that the park met the requirements of an IUCN Management Category II protected area.

Among these objectives have been the measures taken to restore the area's naturalness, and to reverse the detrimental impact of previous human interference. The artificial hardening of the river banks and other hydrological control methods installed over two centuries ago accelerated the flow of the river, resulting in the riverbed becoming deeper while inhibiting flooding of the adjacent wetlands. After significant investment, management of the park has allowed the wetland hydrological regime to be restored, and for zonation for use and other activities has been strictly enforced.

We are concerned to learn of the proposed Expressway project “**S1 Wiener Außenring Schnellstraße Schwechat – Süßenbrunn**” and understand that environmental assessment and approval procedures are currently in process for this project that has the potential to result in significant negative impacts on the integrity and the objectives of the Donau-Auen National Park. For the record, we would like to state the following:

- (i) Austria assigned the Donau Auen National Park to IUCN Protected Area Management Category II: National Park, and this categorisation was certified after an expert review by the IUCN World Commission on Protected Areas.
- (ii) Category II protected areas are large natural or near natural areas set aside to protect large-scale ecological processes, along with the complement of species and ecosystems characteristic of the area, which also provide a foundation for

environmentally and culturally compatible spiritual, scientific, educational, recreational and visitor opportunities.

- (iii) The area meets the requirements for an IUCN Category II National Park, because of its size and its management objectives.
- (iv) If an activity is proposed that **will impact negatively** on the achievement of the area's naturalness, the maintenance of essential ecological processes, or on significant biodiversity or other values of the site, then it would **no longer meet the criteria for a Category II National Park**.
- (v) In addition to the primary objective, a category II national park objectives also include:
 - To manage the area in order to perpetuate, in as natural a state as possible, representative examples of physiographic regions, biotic communities, genetic resources and unimpaired natural processes;
 - To maintain viable and ecologically functional populations and assemblages of native species at densities sufficient to conserve ecosystem integrity and resilience in the long term;
 - To contribute in particular to conservation of wide-ranging species, regional ecological processes and migration routes;
 - To manage visitor use for inspirational, educational, cultural and recreational purposes at a level which will not cause significant biological or ecological degradation to the natural resources;
 - To take into account the needs of indigenous people and local communities, including subsistence resource use, in so far as these will not adversely affect the primary management objective;
 - To contribute to local economies through tourism.

IUCN is concerned that the proposed project will have significant negative impacts on the area, based on the report submitted by Prof. Dr. Josef Lueger dated 6.11.2019, which states, among other things:

"The existence of the Danube floodplains with their characteristic fauna and flora is dependent on groundwater. If the project "S1 Wiener Außenring Schnellstraße Schwechat – Süßenbrunn" (with the planned tunnel under the Danube river and the Lobau) were to be implemented, resulting in a foreseeable lowering of the water level, this would have a serious negative impact on the fauna and flora in the national park. This would not only contradict the provisions of § 1 of the Vienna National Parks Act, but would even result in the de-recognition as a national park of category II of the IUCN Guidelines. In summary, it is to be expected that the dewatering of the S1 construction pits north of the Lobau will withdraw water from the National Park and lower the water level there to an as yet unknown extent. The environmental impact assessment and the approval procedures to date have not examined how the foreseeable lowering of the water level in the National Park will affect fauna and flora."

IUCN is concerned that the specific impacts of the proposals on the hydrology of the area and hence on the ecological processes integral to the park have not received adequate attention, and that a decision to approve this project may proceed in the absence of definitive studies on these impacts and their avoidance or mitigation.

IUCN would also like to draw your attention to one of the decisions of the IUCN World Conservation Congress 2016, where the Recommendation 102 (WCC-2016 Recc 102) 3. CALLS ON governments to prohibit environmentally damaging industrial activities and

infrastructure development in all IUCN categories of protected area, and to take measures to ensure that all activities are compatible with the conservation objectives of these areas, through appropriate, transparent and rigorous pre-emptive appraisal processes, such as international best practice environmental and social impact assessments, strategic environmental assessments, and appropriate regulation (<https://portals.iucn.org/congress/assembly/motions/print?langua>).

In the light of these considerations, IUCN recommends that exhaustive studies of the possible impacts of the proposed expressway be conducted. The relevant Austrian authorities should demonstrate that the project "S1 Wiener Außenring Schnellstraße Schwechat - Süßenbrunn" (with the planned tunnel under the Danube River and the Lobau) will not have any negative impacts on the Donau-Auen National Park. IUCN will gladly review these studies, and convene an expert mission to review and consider the findings, prior to any decision being taken on the merits of this proposal.

Should the project approval and court proceedings be concluded without verified evidence that there will not be significant impacts on the Donau Auen National Park, this would be an indication that the area is not being managed in accordance with the criteria for an IUCN Category II National Park. There will be a clear risk that the project will result in negative impacts to the integrity of the protected area. In this case, the international recognition of the Donau-Auen National Park as a park meeting the criteria for an IUCN Category II National Park, and indeed the globally recognised standards for the effectiveness of protected area, would no longer be guaranteed, may be withdrawn.

With best wishes



Trevor Sandwith

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