



Two draft RBMPs were assessed in April 2021: Eastern Alps (ITA) and Southern Apennines (ITF). The Southern Apennines draft RBMP is unclear about exemptions that will be applied, except those applied to groundwater bodies affected by saline intrusion. No exemptions are planned under article 4(7), while in the Eastern Alps, this will be postponed to the next version of the RBMP after the consultation phase. The draft RBMP budget is not yet published for the Eastern Alps while €200 million has provisionally been allocated to the Southern Apennines. However, none of the measures appear to address the WFD environmental objectives. The draft RBMPs do not provide summary information on the implementation of the second RBMPs. No assessment of the effectiveness of the previous RBMP measures is provided. Three of the selected topics are considered as main challenges, and the findings of the assessment are detailed below. Most of the topics assessed are also considered as Significant Water Management Issues:

Hydropower: Hydromorphological pressures are well described in the Eastern Alps draft RBMP, both at water body level, and connected to the energy sector. However, the inventory of planned new hydropower plants is largely incomplete. The draft RBMP only refers to the implementation of national and district regulations on

ecological flows for hydropower plants. No measures are included for the refurbishment or decommissioning of older outdated hydropower plants.

River and wetland restoration: Both draft RBMPs include a complete list of nature-protected areas, but no reference to their conservation status or to the necessary measures to be implemented in corresponding water bodies. However, this is planned for the end of 2021 for the Eastern Alps. No quantitative targets are set for ecosystem restoration, or clear prioritisation criteria fixed. No references are made to nature-based solutions or natural water retention measures, although in both plans, opportunities exist for win-win measures named in the Flood Risk Management Plan, and within the planned sediment management programme. However, the plan for the Eastern Alps also foresees numerous traditional flood protection measures in the Veneto region, which will deteriorate water bodies.

Flood management and climate proofing: The draft RBMPs do not include a sensitivity analysis of the proposed measures under changing climatic conditions and they provide very little evidence for synergies with the Floods Directive. Considerations have not been made on how land-use changes can mitigate flood risks. Conventional

	Topic	IT	
		S.Apenn.	E.Alps
1	Removal and adaptation of barriers		
	1. Identification of the problem		
	2. Prioritisation		
	3. Cost-benefit analysis and monitoring plan		
	4. Ambition		
2	Hydropower		
	1. Pressures and sectors		
	2. Inventory of planned projects		
	3. Justification and exemptions		
	4. Criteria and thresholds		
	5. Plans for refurbishment and decommissioning		
3	Inland navigation		
	1. Pressures and sectors		
	2. Inventory of planned projects		
	3. Justification and exemptions		
	4. Criteria and thresholds		
	5. 'Working with nature'		
4	Freshwater ecosystem protection and restoration and NBS		
	1. Protected areas and their status		
	2. Prioritisation		
	3. Restoration targets		
	4. Nature-based solutions (NBS)		
	5. Natural Water Retention Measures (NWRM)		
	6. Sound financial mechanism		
5	Water allocation and abstraction control		
	1. Identification of significant water abstractions		
	2. Prospects of new water abstractions, related infrastructure and land uses		
	3. Review of abstraction permits		
	4. Abstraction control		
6a	Drought management		
	1. PoM "climate checks"		
	2. Drought management plans		
6b	Flood management		
	1. PoM "climate checks"		
	3. Link with the Floods Directive		
	4. Land use and flood management		
7	Agriculture		
	1. Assessment of pressures		
	2. Gap analysis and measures		
	3. Diffuse pollution		
8	Coal mines (and combustion)		
	1. Assessment of the problem		
	2. Priority hazardous substances		
	3. Climate change		
	4. Justification and exemptions		
	5. Cost recovery		
	6. Liabilities		
9	Economic instruments and adequacy of budget		
	1. Cost recovery calculation for sectors		
	2. Cost recovery rates and exemptions		
	3. Budget		
10	Exemptions		
	1. Number of exemptions		
	2. Gap analysis		
	3. Art. 4(4) and 4(5) exemption justifications		
	4. Article 4(6) exemption justifications		
	5. Article 4(7) exemption justifications		
11	Review and update on the implementation of the previous RBMP		
	1. Implementation of measures		
	2. Effectiveness of measures		

grey flood protection measures are included as measures to fulfil WFD goals, despite their potential negative effects on the ecological status of concerned water bodies.

Economic instruments and budget adequacy: In the Eastern Alps draft RBMP, no clear information is provided regarding cost recovery, whether it covers environmental and resource costs, or exemptions. No budget has yet been provided for the PoM in the draft RBMP.

	RELEVANCE	LEVEL OF PERFORMANCE				
		high	good	moderate	poor	N/A
	Not applicable or relevant for the RBD					
	This problem/ challenge has already been solved in the second RBMP					
	One of the many problems/challenges in this RBD					
	One of the Significant Water Management Issues (SWMI)					
	The main problem/challenge in this RBD					

Table 19: Overview of the performance of the draft 2022-2027 RBMPs Eastern Alps and Southern Apennines (Italy) on key topics by indicator.