



**Environmental Protection of International River Basins  
Project (EPIRBP)**

**Contract No. ENPI/2011/279-666**



Funded by the European Union and Implemented by a Consortium led by Hulla & CO. Human Dynamics

---

## **Annex 22 to the Central Kura Basin District(Azerbaijan) RBMP**

---

### **Summary of the consultation process on the draft Central Kura River Basin Management Plan**

---



01.09.2015



**Environmental Protection of International River Basins  
Project (EPIRBP)**

**Contract No. ENPI/2011/279-666**



Funded by the European Union and Implemented by a Consortium led by Hulla & CO. Human Dynamics

---

The European Union is made up of 28 member states who have decided to gradually link together their know-how, resources and destinies. Together, during a period of enlargement of 50 years, they have built a zone of stability, democracy and sustainable development whilst maintaining cultural diversity, tolerance and individual freedoms. The European Union is committed to sharing its achievements and its values with countries and peoples beyond its borders.

Legal notice: This document has been produced with the assistance of the European Union. The views expressed in this document are the sole responsibility of the Human Dynamics Consortium implementing the project and can in no way be taken to reflect the views of the European Union.



## Introduction

In April 2015, the EPIRB Project and Ministry of Ecology and Natural Resources of Azerbaijan Republic (MENR) opened a consultation process on the draft Central Kura River Basin Management Plan (RBMP). The consultation ran for four and half months between April-August 2015.

This document contains a summary of responses received during this period, including the comments received at the public consultation meeting(s), as well as in written form.

The consultation documents were published on the EPIRB project website at [www.blacksea-riverbasins.net](http://www.blacksea-riverbasins.net), as well as on REC Caucasus Baku website at [www.rec-azerbaijan.az](http://www.rec-azerbaijan.az). Stakeholders were also contacted by email informing them on the consultation process and information on the possibility to provide written comments at [mabdulhasanov@gmail.com](mailto:mabdulhasanov@gmail.com)

## Summary of comments

During the consultation period comments were received from 5 beneficiary organizations. *Table 1* comprises the comments received in written form and the responses from the RBMP consultants and MENR. The table, following some general comments, is arranged according to the chapters of the draft RBMP to which the comments refer. Multiple comments making the same point have been combined with a note to indicate this.

Comments received during the public consul consultation meeting held in Ganja on 23<sup>rd</sup> of April 2015 are summarized in *Table 2*.

*Note: Minutes of the consultation meetings and List of Participants are accessible on the project website at [www.blacksea-riverbasins.net](http://www.blacksea-riverbasins.net).*



**Table 1. List of comments received in written and responses**

Institution/ Organization <sup>1</sup>	Reference <sup>2</sup>	Comment	Response/Action	Comment has been integrated in the RBMP [YES/ NO]
Water Agency(WA)	Summary(Page 6)	nautical mile	Express in km	YES
-	Text above table on page 8	Four lake water bodies are located on the territory of the pilot basin	Three lake water bodies are located on the territory of the pilot basin	Yes
Azerbaijan Amelioration JSC	3.Economic and fiscal measures	“Amelioration JSC	Azerbaijan Amelioration JSC	Yes
-	3.Economic and fiscal measures	Provision of penalties / fines for over abstraction	Provision of penalties / fines for over abstraction and other economic instruments	yes
MENR	3.Economic and fiscal measures	Establishment of system of water abstraction management to control fulfillment of environmental flow requirements	Establishment of system of water abstraction management and control to supervise fulfillment of environmental flow requirements	Yes
WA	3.Economic and fiscal measures	Water Resources State Agency	Water Resources State Agency of MOES	YES
-	4. Emissions control	issue permits for discharges and enforce the terms of licenses and control compliance with the provisions of the waste water discharge permits	issue permits for discharges and enforce the terms of licenses and control compliance with environmental requirements	No

<sup>1</sup> Please ask respondents whether the name of their organization can be published, if not feasible the sector to which they belong should be included: agriculture, industry, civil society etc.

<sup>2</sup> Chapter of the draft RBMP



Environmental Protection of International River Basins Project (EPIRBP)

Contract No. ENPI/2011/279-666



Funded by the European Union and Implemented by a Consortium led by Hulla & CO. Human Dynamics

Institution/ Organization <sup>1</sup>	Reference <sup>2</sup>	Comment	Response/Action	Comment has been integrated in the RBMP [YES/ NO]
MENR	2.1. Natural conditions	<p>The Central Kura RBD is located in the Ganja-Gazakh Economic Region at western part of Azerbaijan and covers Agstafa, Dashkesen, Gadabay, Goranboy, Khanlar, Gazakh, Samukh, Shamkir, Tovuz administrative regions, cities like Ganja and Naftalan. Economic region has suitable economic – geographical location. It is located on the North – eastern slope of Lesser Caucasus mountain ranges, has border with Armenia in South – West and with Georgia in the West and North of the region.</p> <p>Region covers the area of 12 500 km<sup>2</sup> (14.4 % of the territory of the Azerbaijan Republic). The territory of the region can be divided into 4 (height?) zones considering its landscape characteristics: sloppy plains, foothill zone, middle highland (1000-2000 m a.s.l.) zone and alpine zone (more than 2000 m a.s.l ).</p>	<b>Repeated (p.21)</b>	Yes
MENR	3.2.4.2.Drinking water abstraction	Waste waters are treated in WWTP located near Poylu village and used for irrigation purposes after treatment.	Waste waters are treated in WWTP located near Poylu village and used for irrigation of greenes after treatment.	YES
-	.3.5.2.1 <i>Urban waste water</i>	Domestic and industrial wastewaters of Ganja are discharged to vineyards located in Garayeri field in nearly 18 km distance in the north-east of the city, used for their irrigation after biological	Domestic and industrial wastewaters of Ganja are discharged to vineyards located in Garayeri field in nearly 18 km distance in the north-east of the city, üas used for purpose of	Yes



**Environmental Protection of International River Basins Project (EPIRBP)**

**Contract No. ENPI/2011/279-666**



Funded by the European Union and Implemented by a Consortium led by Hulla & CO. Human Dynamics

Institution/ Organization <sup>1</sup>	Reference <sup>2</sup>	Comment	Response/Action	Comment has been integrated in the RBMP [YES/ NO]
		treatment. It was considered as a problem solution according to former USSR regulations. In reality vine trees have been watered throughout the year and those waters are not useful for any purpose because of their quality.	irrigation after biological treatment	
MENR	5.2.1 Existing Groundwater Monitoring network	Twelve artesian monitoring wells are flowing.	Twelve artesian monitoring wells are pressured	Yes
	Table 29	Hydrogeological Expedition	the Complex Hydrogeological Expedition	YES
WA	7.3.1 National and regional development programs	The State Agency for Water Resources	The State Agency for Water Resources of MOES	YES
Azerbaijan Amelioration JSC	-7.3.1 National and regional development programs	Amelioration JSC	Azerbaijan Amelioration JSC	YES
AZERSU	7.3.2. National Water supply and Sanitation Program	Waste waters will be treated at WWTP located in Dagkasaman village og Akstafa raion and will be used for irrigation	Waste waters will be treated at WWTP located in Dagkasaman village og Akstafa raion and will be used for irrigating of green areas	Yes



**Environmental Protection of International River Basins Project (EPIRBP)**

**Contract No. ENPI/2011/279-666**



Funded by the European Union and Implemented by a Consortium led by Hulla & CO. Human Dynamics

Institution/ Organization <sup>1</sup>	Reference <sup>2</sup>	Comment	Response/Action	Comment has been integrated in the RBMP [YES/ NO]
AZERSU	7.3.2. National Water supply and Sanitation Program	Waste waters are treated in WWTP located near Poylu village and used for irrigation after treatment.	Waste waters are treated in WWTP located near Poylu village and used for irrigating of green areas after treatment.	Yes
WA	-7.3.6. Flood protection measures	Construction of new residential settlements in territories where floods are taking place every five years is forbidden in several countries	Construction of new residential settlements in territories where floods are taking place every five years is forbidden in several countries It would be important to strengthen the legal basis in Azerbaijan in this field	YES
	7.3.7. Solid waste management	information is lacking	Information and Data gathering. This will include: <ul style="list-style-type: none"> <li>• Desk study on Existing Conditions</li> <li>• Data collection with the following information <u>relative to each districts in the region</u>:               <ul style="list-style-type: none"> <li>• Waste generation data.</li> <li>• Collection, Treatment, and Disposal Service Characterization.</li> </ul> </li> <li>• Institutional Responsibilities and Capacity.</li> </ul>	-Yes



**Environmental Protection of International River Basins Project (EPIRBP)**

**Contract No. ENPI/2011/279-666**



Funded by the European Union and Implemented by a Consortium led by Hulla & CO. Human Dynamics

Institution/ Organization <sup>1</sup>	Reference <sup>2</sup>	Comment	Response/Action	Comment has been integrated in the RBMP [YES/ NO]
			<ul style="list-style-type: none"> <li>Existing Budgets and Financial Resources.</li> <li>Waste Characterization Studies/surveys.</li> </ul> <p>Deficiencies Assessment – Based on the above activities, a deficiencies analysis which will include consideration of existing SWM deficiencies associated with 1) service provision, management and technical deficiencies, 2) economic/financial deficiencies and 3) institutional and capacity deficiencies will be conducted.</p>	
MENR	7.3.8 Forestry	7.3.8 Forestry	Forestry related measures	yes
Azerbaijan Amelioration JSC	8.3.2 Economic assessment of irrigation water use services	Amelioration JSC	Azerbaijan Amelioration JSC	YES
WA	Reference	Jesper Ansbaek, Anatoli Pichugin, Peter Roncak, Vafadar İsmayilov, Farda İmanov and Rafiq Verdiyev. Pilot River Basin Management plan of Ganjachay basin. Baku, 2011	Repeated(Deleted)	Yes
MENR	PoM	There is need to install automatic hydrological	This should be done by Hydromet in	Yes





**Environmental Protection of International River Basins Project (EPIRBP)**

**Contract No. ENPI/2011/279-666**



Funded by the European Union and Implemented by a Consortium led by Hulla & CO. Human Dynamics

Institution/ Organization <sup>1</sup>	Reference <sup>2</sup>	Comment	Response/Action	Comment has been integrated in the RBMP [YES/ NO]
		gauging stations to collect and transfer data to relevant centers to develop forecast and flood early warning system	cooperation with created basin units	
MENR	PoM	There is need to apply EU flood Directive in Central kura	EPIRBproject is planning to fund relevant pilot project	Yes
MENR	PoM	PRBMP should consider development of joint action plans with Georgia to collect and share hydrological information in upstream of Kura	This should be part of full Kura(upstream of Mingechavir reservoir) transboundary river basin plan	Yes
MENR	PoM	There is ns need to prepare inventory of pollutants in Central Kura and also on Georgian part of Kura	In Ventral Kura some projects included into PoM colsiders this and in future there will be need to do same for upstream of Kura in cooperation with Georgia	Yes
MENR	PoM	There is need to develop water monitoringstrategy and classification system	This is beeing done by EPIRB project	Yes
MENR	PoM	There is need to rehabilitate Gazakh laboratory of MENR	EPIRB project is planning to support MENR for laboratory rehabilitation on stepwise approach	Yes
MENR	PoM	There is need to conduct monitoring of ground waters near areas of surface WBR	Should be added to list of PoM	Yes
MENR	PoM	Supervision of existing groundwater monitoring points and repairing any unfit points;	This should be done by Minsistry in cooperation with created basin units	Yes
MENR	PoM	Establishment of new groundwater monitoring stations in the areas with surface water at risk;	This should be done by Ministryt in cooperation with created basin units	Yes



**Environmental Protection of International River Basins Project (EPIRBP)**

**Contract No. ENPI/2011/279-666**



Funded by the European Union and Implemented by a Consortium led by Hulla & CO. Human Dynamics

Institution/ Organization <sup>1</sup>	Reference <sup>2</sup>	Comment	Response/Action	Comment has been integrated in the RBMP [YES/ NO]
MENR	PoM	Preparation of studies/assessment of protected areas for protection of drinking water sources, in line with relevant EU directive;	This is partly included into PoM and needs to be addressed deeply when basin entity starts to implement RBMP	Yes
Azerbaijan Amelioration JSC	PoM	There is need to conduct study on construction of reservoirs on Ganjachay , Zayamchay and some other rivers where there is no water regulation to improve water management and keep environmental flow	There will be study pilot within in PoM is On necessity of construction of such reservoirs	Yes
Azerbaijan Amelioration JSC	PoM	There is need to add measure on Climate Change impact assessment on water economy in future	This is partly included into PoM and needs to be addressed deeply when basin entity starts to implement RBMP	Yes
Azerbaijan Amelioration JSC	PoM	There is need to develop IWRM plan taking into account climate change, and increase of water demand	This is partly included into PoM and needs to be addressed deeply when basin entity starts to implement RBMP	Yes
Azerbaijan Amelioration JSC	PoM	RBMP should be implemented together with developed IWRM plan which includes also use of all waters in the area by different hydrotechnical infrastructure , including Kura itself	This is partly included into PoM and needs to be addressed deeply when basin entity starts to implement RBMP	Yes



**Environmental Protection of International River Basins Project (EPIRBP)**

**Contract No. ENPI/2011/279-666**



Funded by the European Union and Implemented by a Consortium led by Hulla & CO. Human Dynamics

Institution/ Organization <sup>1</sup>	Reference <sup>2</sup>	Comment	Response/Action	Comment has been integrated in the RBMP [YES/ NO]
AZERSU	PoM	There is need to assess situation on Water Supply and Sanitation for rural areas and develop programs on improvement of these sustems there	This is partly included into PoM and needs to be addressed deeply when basin entity starts to implement RBMP	Yes
AZERSU	PoM	There is need to study on construvtion of Ganjachay water reservoir to provide dringing water to Ganja and Zayamchay water reservoir to provide local water supply and keep environmental flow in rivers	There will be study pilot within in PoM is On necessity of construction of such reservoirs	Yes



**Table 2. List of comments received during the public consultation meeting and responses**

Reference <sup>3</sup>	Comment	Response/Action	Comment has been integrated in the RBMP [YES/ NO]
<b>General comments</b>	The plan was considered to be very ambitious and important. The RBMP should reflect the influence of the Korchay River on the Central Kura River, as well as the impact of legal and illegal fishponds (e.g. in Korchay region during the Soviet Union many small reservoirs for fisheries were established). Also, gaps related to protected areas were signalled, as in Korchay there is a 5000 ha preservation area.	Korchay is small and no monitoring data about its status, It may impact Kura river directly but it has no impact on Central Kura basin rivers	No
	Results of the on-going World Bank supported programme focusing on waste water management in small and medium settlements should be taken into consideration.	Yes, this is included into supplementary pilot project within the PoM	Yes
	Groundwater terminology from aquifers should be distinguished, as in case of farmers and of representatives of municipalities, this refers to groundwater situated close to the surface, and more exposed for pollution, while for water supply artesian water is used.	Yes, terminology is distinguished in RBMP	Yes
<b>5. Monitoring Programme for SWB and GWBs in the Central Kura Basin District</b>	Establishing a monitoring system which is able to track possible pollution elements coming from neighbouring countries. Regarding the frequency of the monitoring, it was	<i>Monitoring is very expensive, and monitoring programs should be designed to be cost-effective with just as much monitoring as needed to identify problems. There are three levels of monitoring; a screening monitoring</i>	Yes partly

<sup>3</sup> Chapter of the draft RBMP



**Environmental Protection of International River Basins Project (EPIRBP)**

**Contract No. ENPI/2011/279-666**



Funded by the European Union and Implemented by a Consortium led by Hulla & CO. Human Dynamics

Reference <sup>3</sup>	Comment	Response/Action	Comment has been integrated in the RBMP [YES/ NO]
	<p>proposed to increase and to have it not less than 4 times per year.</p> <p>Regarding pesticides, the data one time within 6 years, doesn't give representative data. Same proposal was given regarding groundwater, namely, to have samples more often, as seasons are changing and influencing the groundwater. The EPIRB project has very beneficial results but it would be appreciated, if during the extension of the project these gaps could be addressed.</p> <p>Regarding monitoring of pesticides, the RBMP should include a note that laboratories need to be established or extended, as well as properly equipped. This would enable the government to do the required investments, as soon as the necessary resources are available.</p>	<p><i>(general monitoring), operation monitoring (monitor those water bodies at risk or bad or less than good status), and an investigatory monitoring program. Frequency of screening monitoring is 1-2 years, just to make sure that the water bodies remain in good status or better than good status. The operational monitoring, -if it can be afforded, -should happen 4 times per year, and it includes ecological, chemical and hydro-morphological monitoring as well. Regarding pesticides and other organic substances, the problem is the capacity to do the analysis, as it is very complicated and very expensive, and at the moment the laboratories do not have such capacities. These elements have to be built in in the next 6 years to be able to monitor not just DDT, but all the pesticides. Usually the pesticides are monitored in spring and autumn, as they are washed off the land. Pesticides are locked in the sediments, so by monitoring sediments, a history of pesticides use can be obtained. With regard to groundwater monitoring, we talk about the level of groundwater (quantity) in case of daily monitoring, and not the quality. Automated data loggers can be obtained with continuous output.</i></p> <p>This will be done in future when developing transboundary RBMP for Kura jointly with Georgia</p>	



**Environmental Protection of International River Basins Project (EPIRBP)**

**Contract No. ENPI/2011/279-666**



Funded by the European Union and Implemented by a Consortium led by Hulla & CO. Human Dynamics

Reference <sup>3</sup>	Comment	Response/Action	Comment has been integrated in the RBMP [YES/ NO]
	<p>Inventory of existing groundwater monitoring wells should be prepared, and if possible to refurbish them, if not possible, to establish new wells. The status in 7 places was good, however, it should not be forgotten that surface waters are feeding the ground waters, and as these are at risk, they also pose a risk to the status of ground waters. In conclusion, extension of the number of wells can also be considered, and in the case of transboundary rivers.</p>	<p>Regarding pollution from Armenia this issues is actual currently.</p> <p><i>There is agreement on the need of improvement related to groundwater monitoring. Reliable data regarding groundwater quality is needed in order to forecast some risks. The number of groundwater monitoring wells has been reduced at country level. The work on the Water Strategy is on-going, for which the number of groundwater wells is essential.</i></p> <p>According to PoM this work should be done by relevant division of MENR in cooperation with basin entity in future project</p>	<p>Yes</p>
<p><b>7. Programme of Measures</b></p>	<p>Working group 1 (WG1) suggested:</p> <ul style="list-style-type: none"> <li>- Measures related to legislative basis: importance of forming coordination council for each river basin, and also need to increase public participation in the process was indicated;</li> <li>- Public participation is important during assessment of technical and operational characteristics of existing, constructed and planned wastewater treatment facilities;</li> <li>- Division of measures into technical and drinking water</li> </ul>	<p><i>Basic and Supplementary measures include almost all of mentioned actions.</i></p> <p><i>Some of them, including transboundary water management can be addressed during implementation of new water project</i></p>	<p>Yes</p>



**Environmental Protection of International River Basins Project (EPIRBP)**

**Contract No. ENPI/2011/279-666**



Funded by the European Union and Implemented by a Consortium led by Hulla & CO. Human Dynamics

Reference <sup>3</sup>	Comment	Response/Action	Comment has been integrated in the RBMP [YES/ NO]
	<p>and developing appropriate tariff system based on quality measurement system;</p> <ul style="list-style-type: none"><li>- In case of transboundary areas importance of cooperation with upstream countries in the issues related to floods;</li><li>- Importance of application of system of limits for water use and use incomes coming from extra limit use to improvement of river basin management;</li><li>- Potential application of license system on the use of water resources keeping in mind biodiversity conservation issues;</li><li>- High importance of public control over water leakages and water quality;</li><li>- Application of ecosystem payment services mechanisms;</li><li>- Rainwater harvesting;</li><li>- Participation and support of youth and school children and all public at ecological monitoring process;</li><li>- Financial support from beneficiaries using resources of the basin;</li><li>- Involvement of private sector (companies with high financial potential) to river basin management cycle;</li></ul>		



**Environmental Protection of International River Basins Project (EPIRBP)**

**Contract No. ENPI/2011/279-666**



Funded by the European Union and Implemented by a Consortium led by Hulla & CO. Human Dynamics

Reference <sup>3</sup>	Comment	Response/Action	Comment has been integrated in the RBMP [YES/ NO]
	<ul style="list-style-type: none"> <li>- Financial contribution of agricultural sector beneficiaries.</li> </ul>		
	<p>Working group 2 (WG2) suggested:</p> <ul style="list-style-type: none"> <li>- Strict application of basin plans and dividing country territories into basin regions, and forming administrative units for each of them;</li> <li>- Submitting draft law on water supply and wastewater to established working group for review;</li> <li>- Review and revise action plans, when necessary;</li> <li>- Improvement of flood risk early warning system ;</li> <li>- Identification of flood risk areas and GIS mapping;</li> <li>- Improvement of existing regulations on land use in floodplain areas;</li> <li>- Use of financial sources of formed water fund for protective measures;</li> <li>- Supervision of existing groundwater monitoring points and repairing any unfit points;</li> <li>- Establishment of new groundwater monitoring stations in the areas with surface water at risk;</li> <li>- Preparation of studies/assessment of protected areas for protection of drinking water sources, in line with</li> </ul>	<p><i>Here also it should be noted that Basic and Supplementary measures include almost all of mentioned actions. Some of them, including flood management, climate change impact to water resources, program of measures fro protected areas</i></p>	<p>Yes</p>





**Environmental Protection of International River Basins Project (EPIRBP)**

**Contract No. ENPI/2011/279-666**



Funded by the European Union and Implemented by a Consortium led by Hulla & CO. Human Dynamics

Reference <sup>3</sup>	Comment	Response/Action	Comment has been integrated in the RBMP [YES/ NO]
	<p>relevant EU directive;</p> <ul style="list-style-type: none"><li>- Excluding names of relevant bodies mentioned in the list of measures related to economic and fiscal measures;</li><li>- Changing terminology of educational related measures to measures on capacity building.</li></ul> <p>Measure on assessment of climate change impacts on water resources should be included. In Azerbaijan, the 3<sup>rd</sup> National Communication report to UNFCCC is under finalization, and it will cover also the impacts of climate change on water.</p>		