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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

39th meeting
Strasbourg, 3-6 December 2019

Other complaints

**Alleged threat to the Raaderwald Forest
in Austria**

- REPORT BY THE COMPLAINANT -

*Document prepared by
the Raaderwald, Austria*

**To COMPLAINT No. 2017/07:
ALLEGED THREAT TO THE RAADERWALD FOREST IN AUSTRIA**

Dear Iva Obretenova,

to Complaint No. 2017/07: Alleged threat to the Raaderwald Forest in Austria I send you an actually list of species for further Action (in total we have about 1800 species for this small but species-rich Habitat in the central area). See the attachment. In times of species extinction it is a waste to destroy such Living space, the human being must be able to find other solutions.

Recognize - for the most part, we are Citizen Scientists (with normal working Hours during the week) and therefore can only document a part of the biodiversity in many areas, but since 2016 we have been using GPS photography to document where the respective locality of each species can be determined (like Distribution Maps).

Unfortunately, nature conservation in Europe is still in the Stone Age - there is no database where old finds (files and lists - Zobodat, www.ornitho.at and so on) and new finds (such as GPS photography) can be brought together and linked to various protection regulations, as Berne Convention, Red List IUCN, Birds Directive, Habitats Directive, Red List Austria, Red List Lower Austria and so on (it would be important if the Berne Convention could raise this theme throughout Europe). So our species list is always in Progress, Latin species names from old lists are sometimes no longer associated with new Latin species names, GPS photography has the advantage that you can document as much as possible as quickly as possible, but there are also enormous amounts of data that must be processed by one or two people unpaid, without any help from authorities, Data from different systems must be brought together, it's all Hand made with Computer support, always a construction site, never finished - but so extensive and meaningful that it must not be ignored.

The environmental lawyer Mag. Tom Hansmann (thomas.hansmann@noel.gv.at) and the expert Dr. Manfred Pöckl (manfred.poeckl@noel.gv.at) are also aware of the counter-opinion from "AVL Arge Vegetation Ecology and Landscape Planning GmbH" - please get this counter-opinion from them, so that these species can be taken into the account too (the counter-opinion confirms many of our species, so contains some additional species - for example bats - but with 5 inspections in a few months, it could not document so much like us, many character types were not documented by the counter-opinion).

The entire species list (Excel, pdf) can be requested from Mr. Norbert Steinwendner (n.stw@gmx.at), if you need photography or other things, please contact me (florian.mayr@liwest.at).



Dear Federal President Van der Bellen!

Many thanks for documenting the nature conservation case "Raaderwald" in the presidential office under number S711900 / 173-STR / 2018!

Dear Ladies and Gentlemen of WWF, Global 2000, Greenpeace and BirdLife Austria!

The following questions should be answered to the Berne Convention in the case Raaderwald Forest until 4.2.2019:

- (1) further details and evidence of the alleged threat as well**
- (2) concrete information about the exact planned activities and**
- (3) to provide the exact timetable for their implementation.**

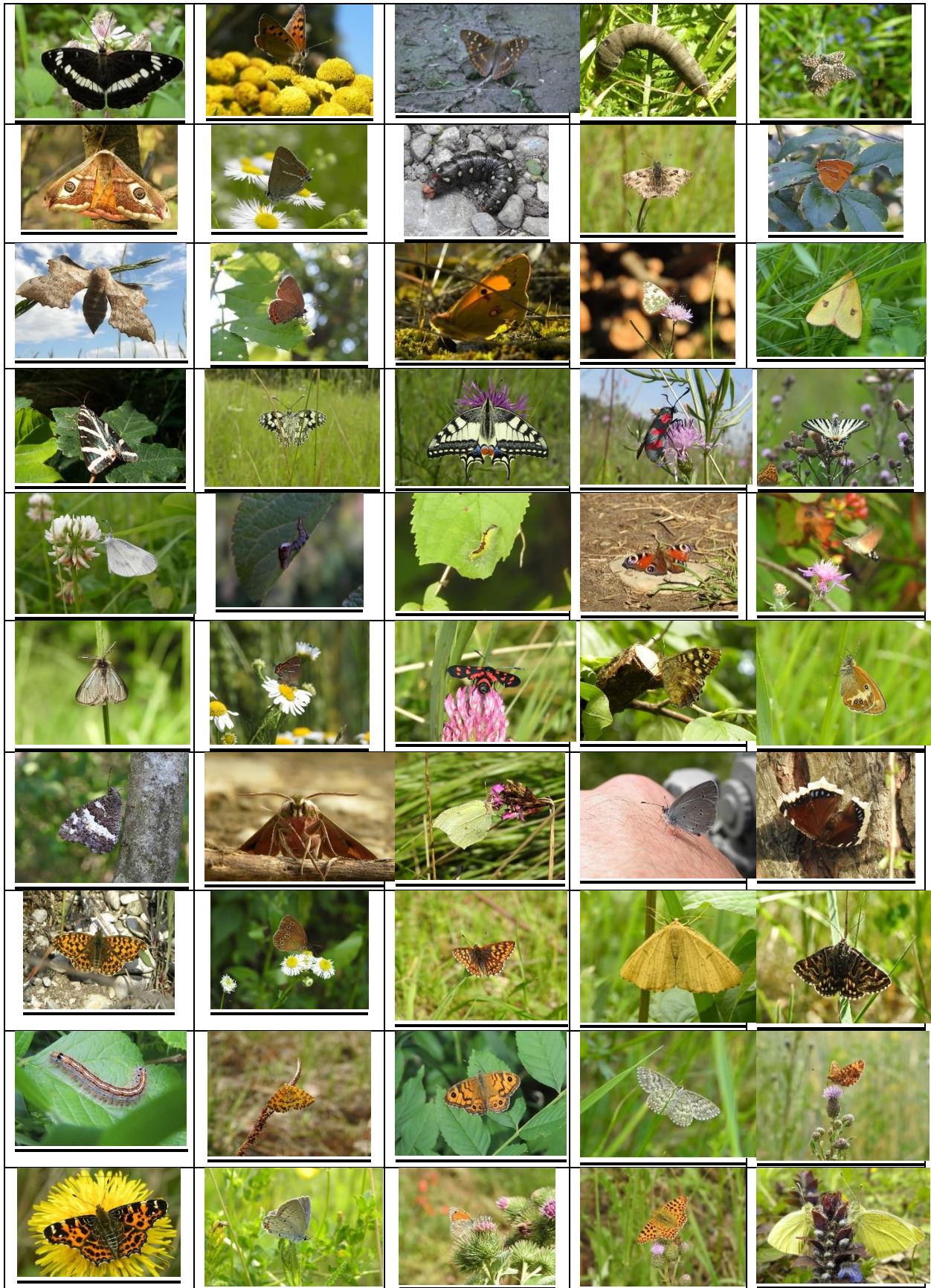
Over the past few weeks, material has been collected to answer these three questions (newspaper articles, e-mails, photos, environmental information) and a total of around 90 pages have been written, which answer these three points in great detail ((7 specific dangers, timeline with 40 points from the past, timetable with 10 points for the future) and do not throw a good light on nature conservation.

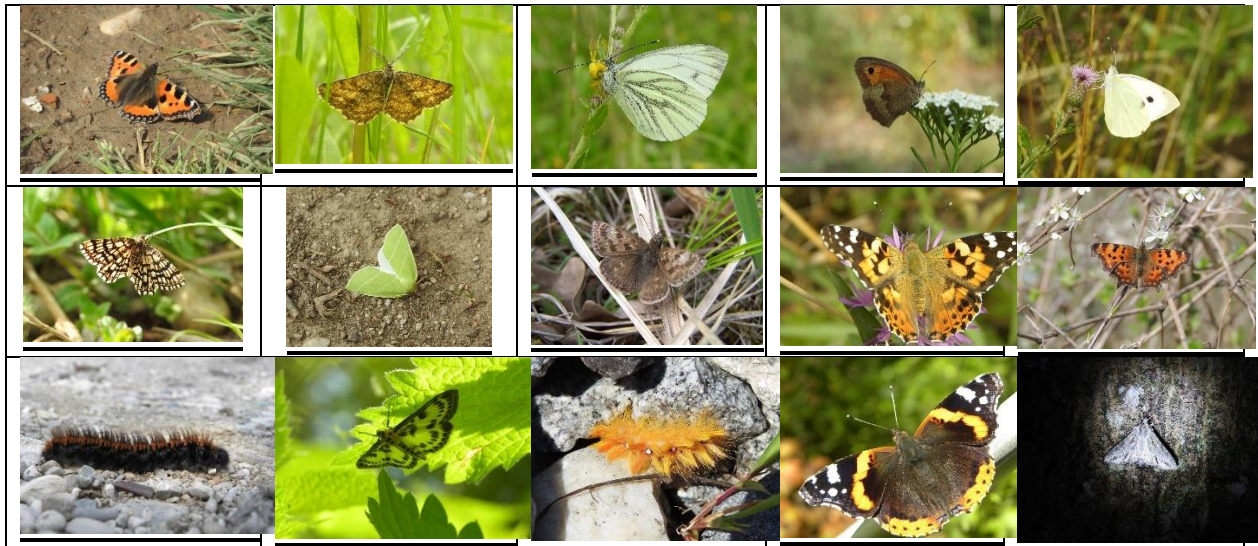
However, this report is not transmitted, because it would probably hit the wrong people, who try to do- in for protection of nature poor conditions and pressure from other side – their work in this one-sided field of tension. For those in charge, the report would not change anything, they put one thing above everything else. Austria has lost sight of nature, plants, animals, insects and biodiversity.

Since habitats, animals and plants have no lobby or lawyer, just some of the more than 1,200 species that have been photographically documented in recent years in this 60-acre site speak to you through pictures – at the end of this communication a few positive alternative (and general) proposals for solutions on the topic Raaderwald are given, which are welcome to be forwarded to the competent Austrian and Lower Austrian authorities (and think tanks).

„IN THE NAME OF THE BUTTERFLIES FROM RAADERWALD“

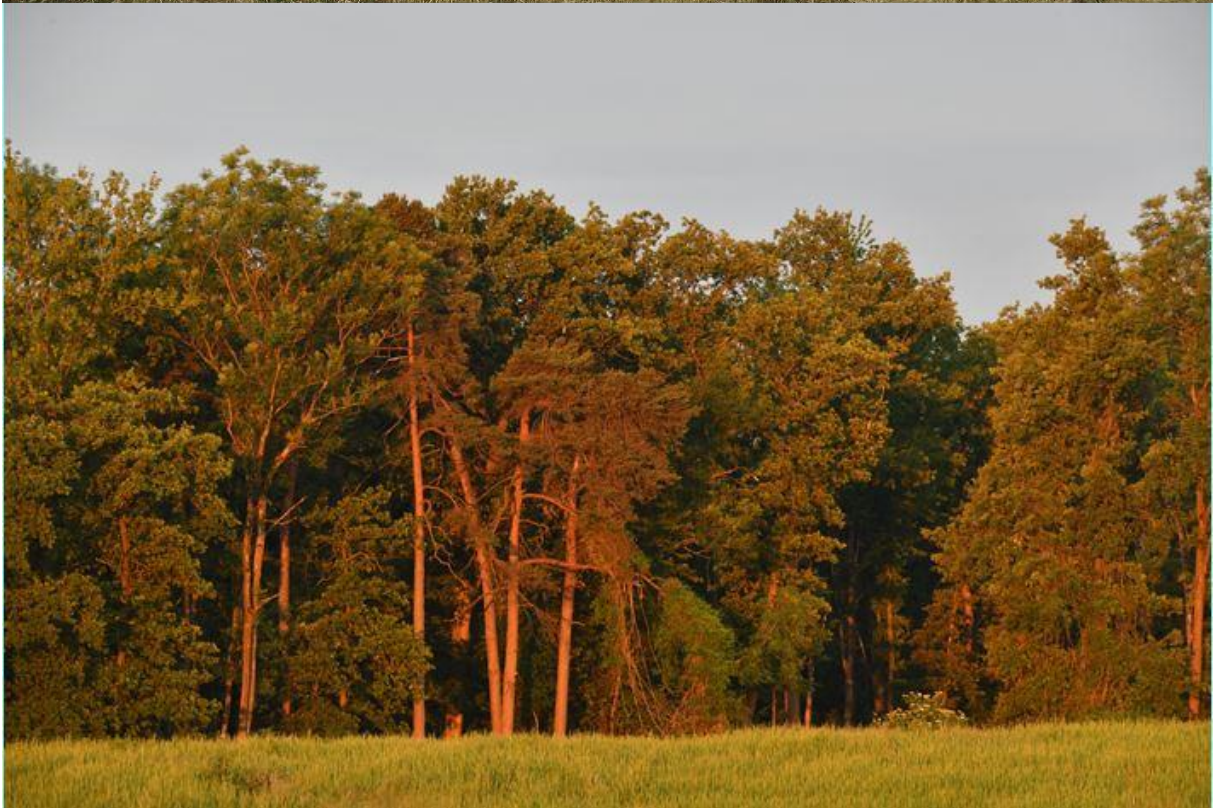






(all the photos were taken on the about 60 hectare threatened area oft he Raaderwald, and that's only a selection of butterflies – there are much more moths)

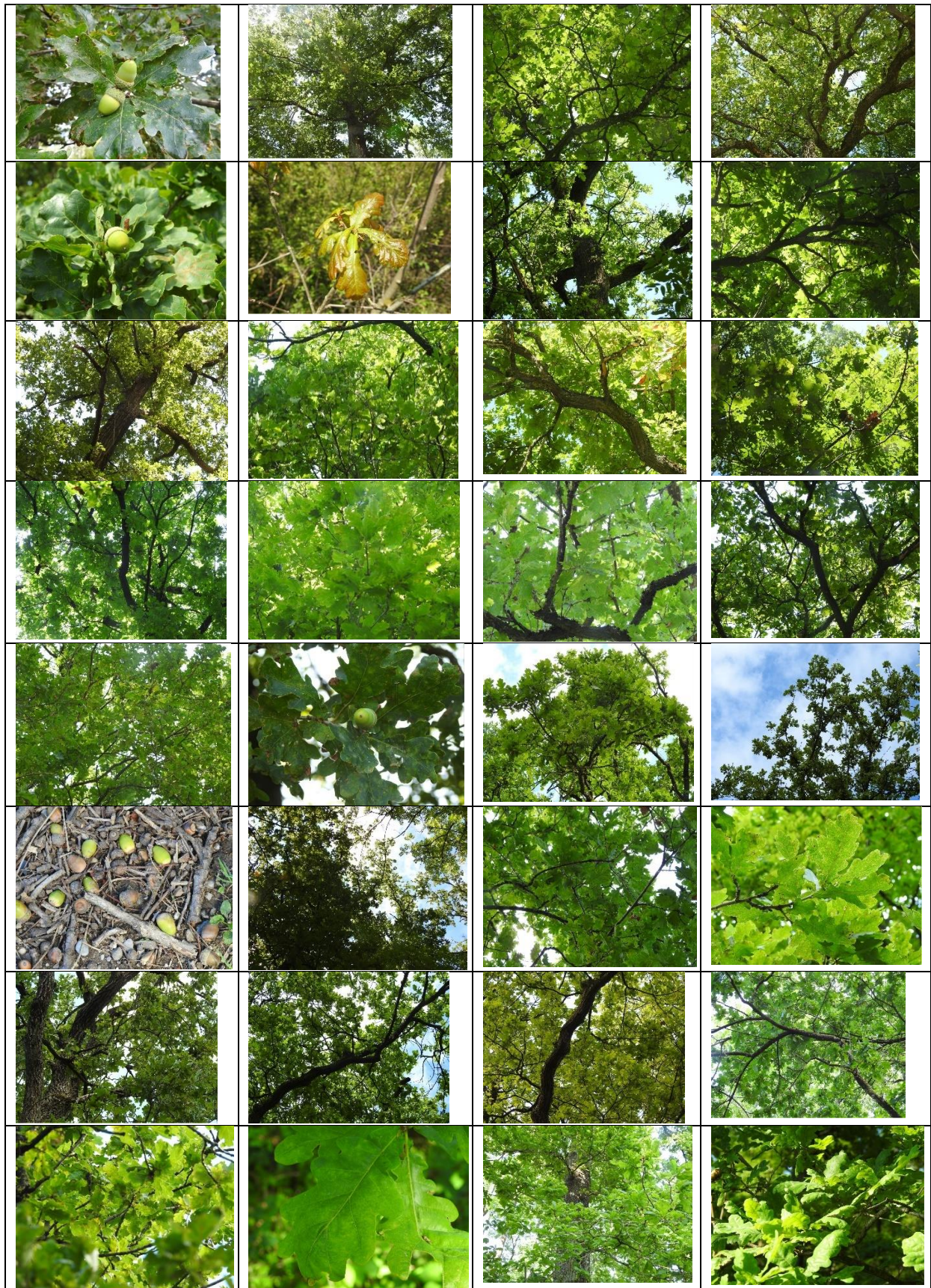








„IN THE NAME OF THE OAKS FROM RAADERWALD“





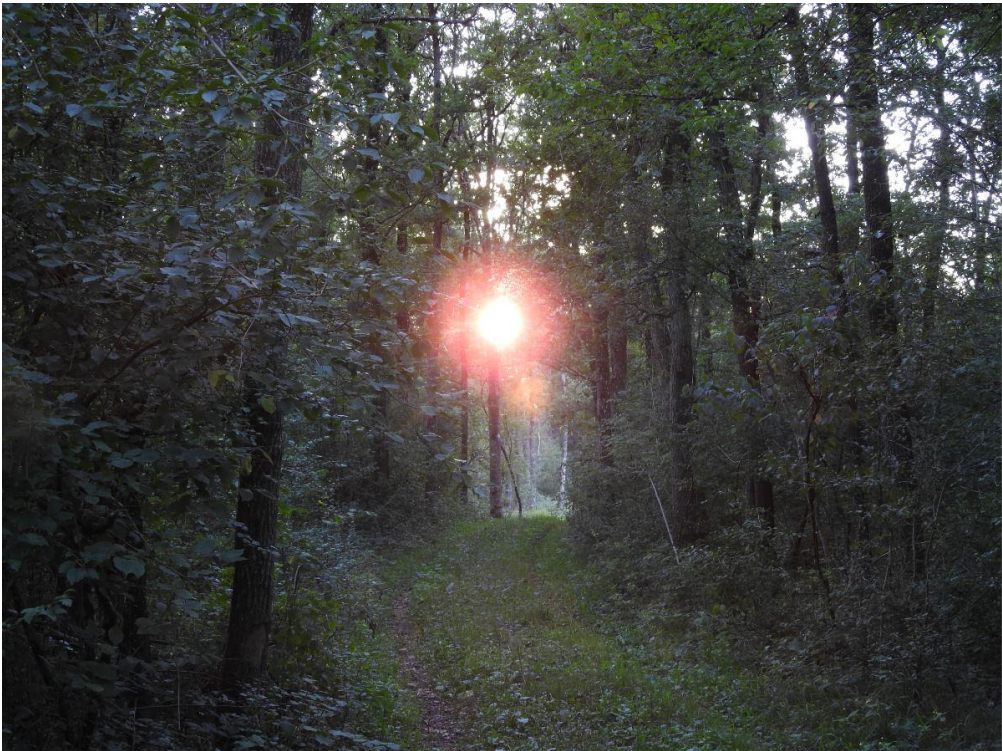






Many of the birds pictured here breed in the Raaderwald or Raaderwald-area, even some have their hunting ground here, so are some winter guests, many migratory birds pull through here.

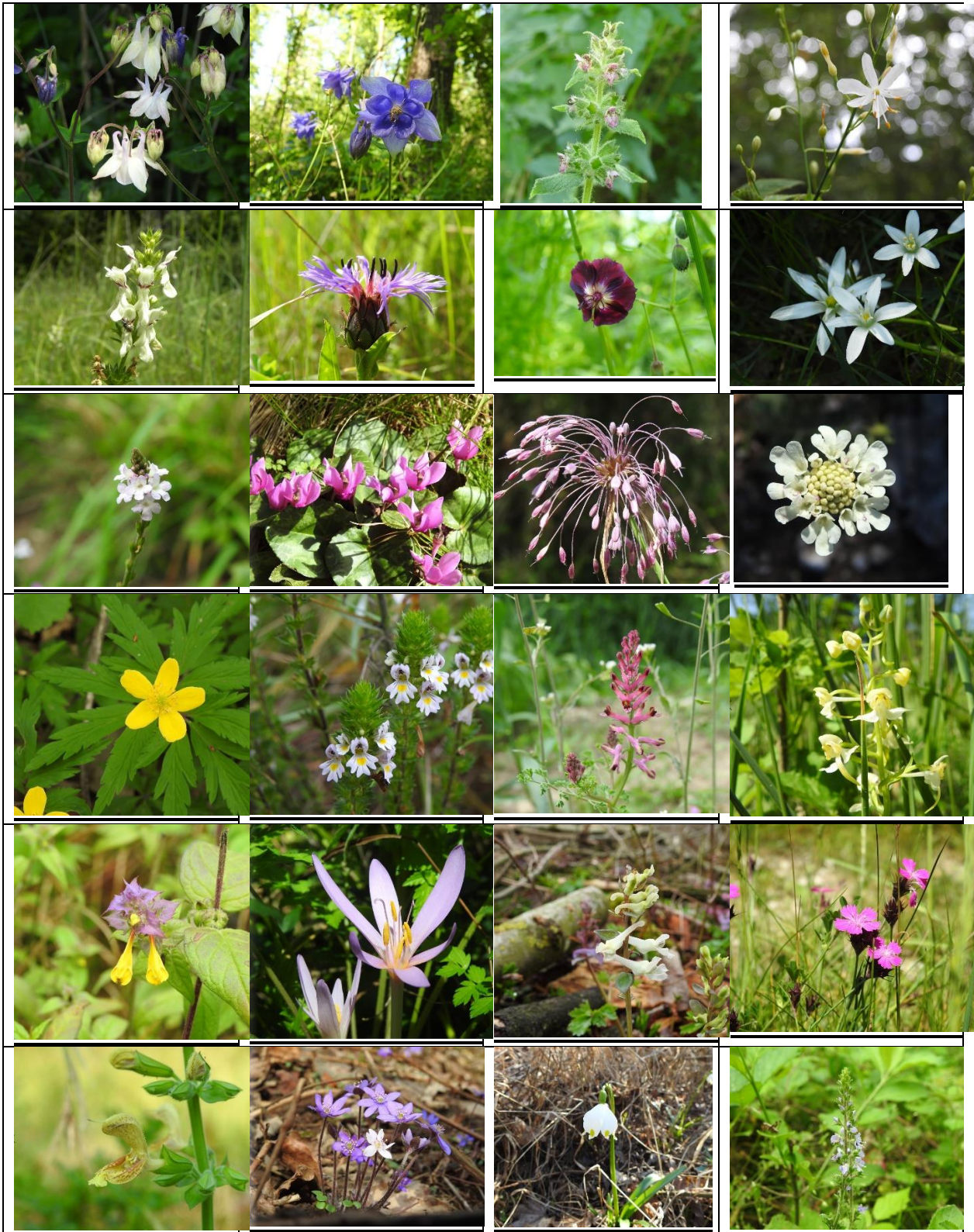


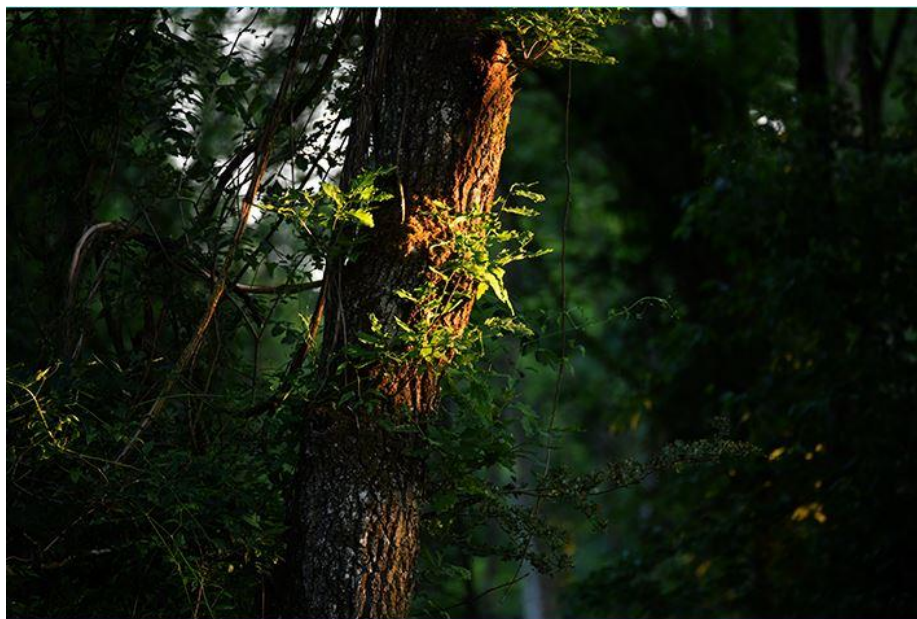






„IN THE NAME OF THE FLOWERS FROM RAADERWALD“

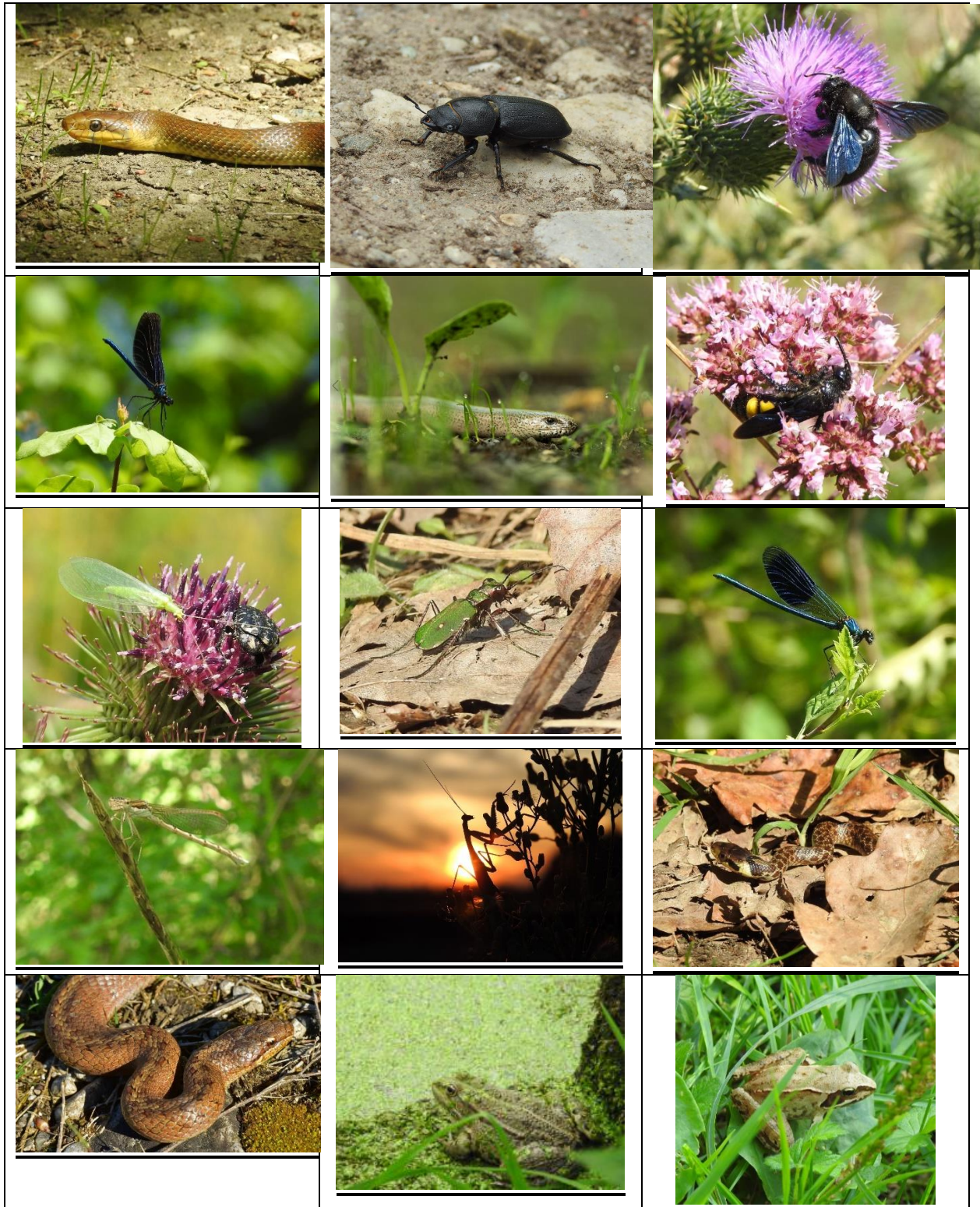






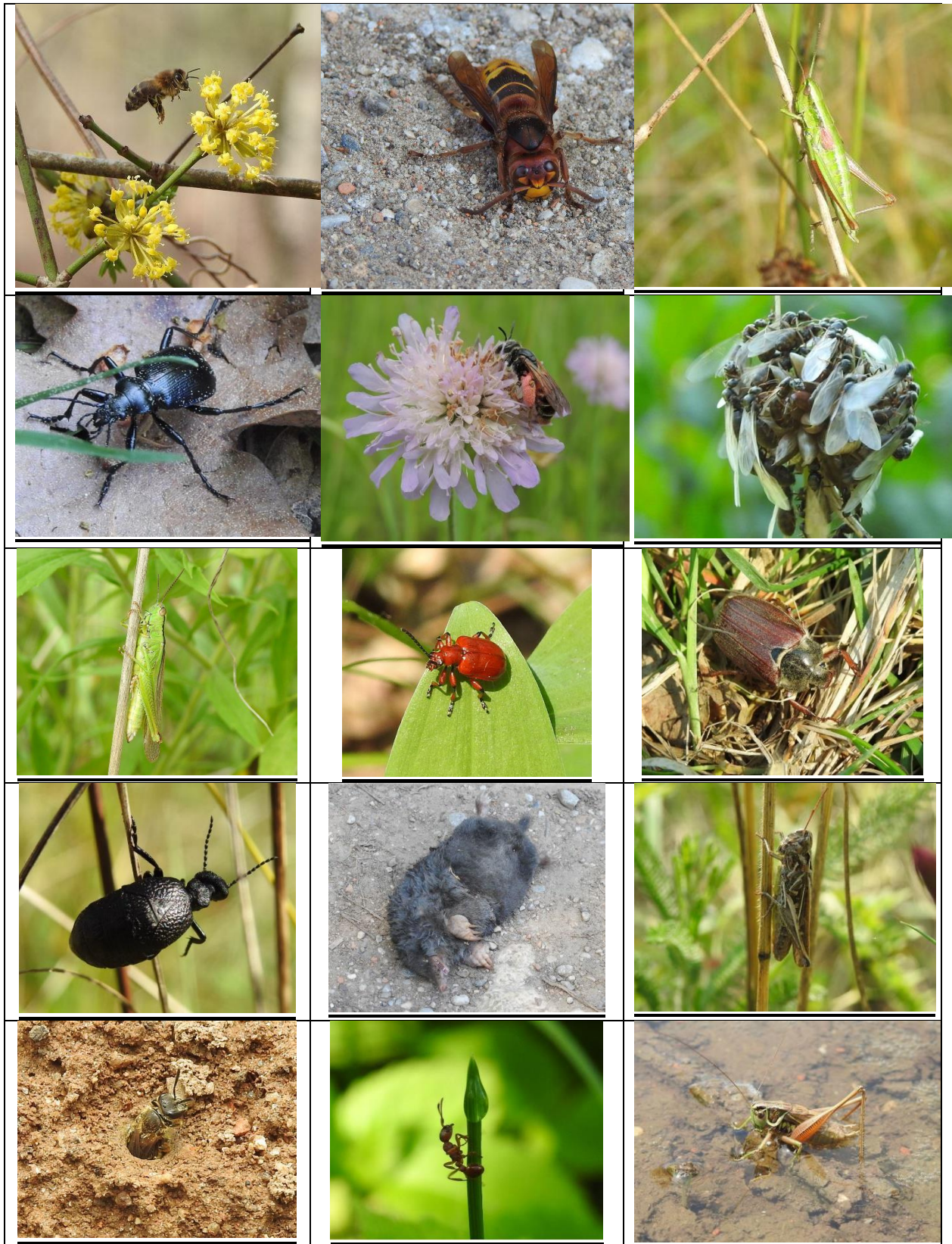


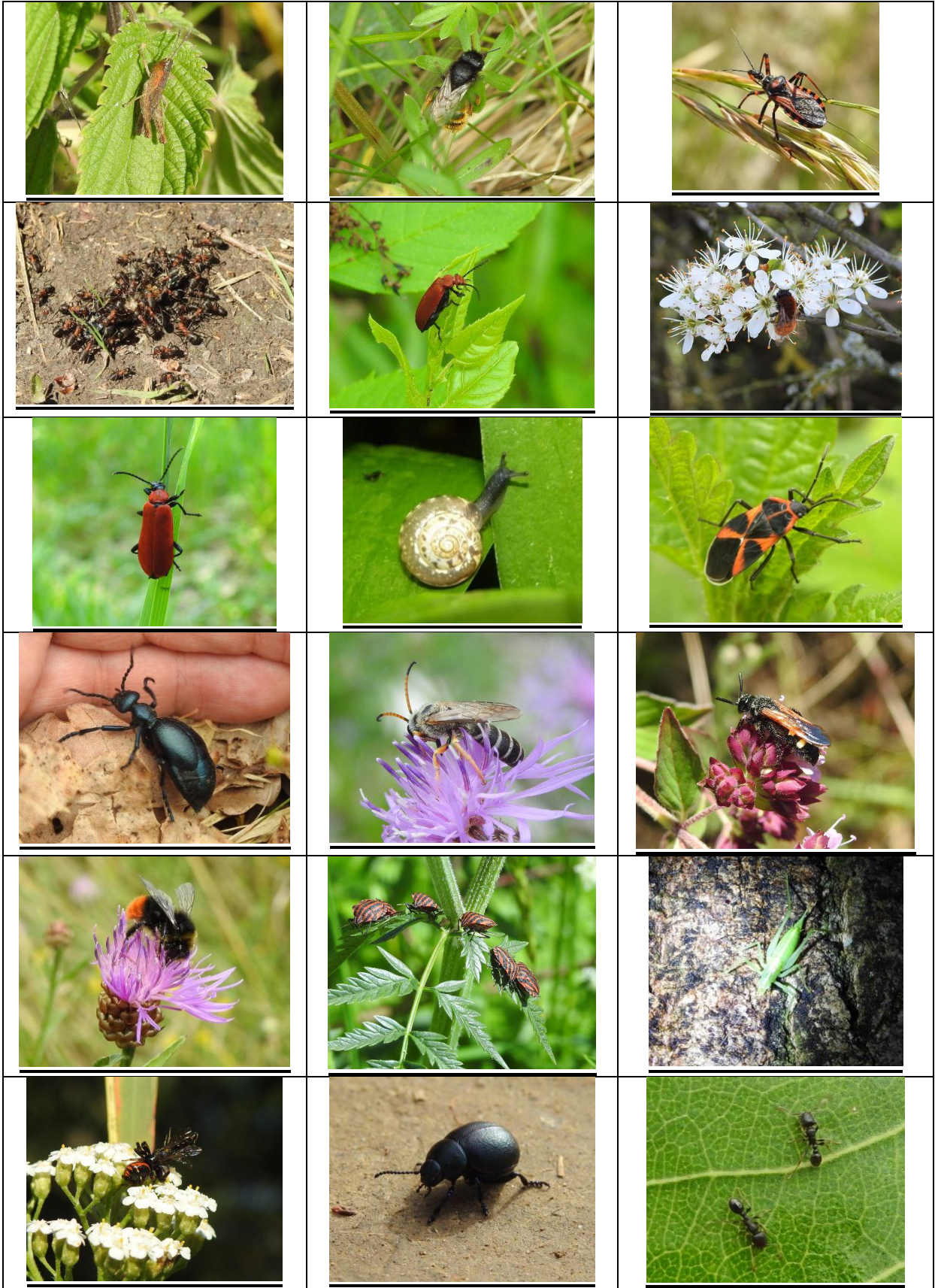
„IN THE NAME OF OTHER SPECIES FROM RAADERWALD“

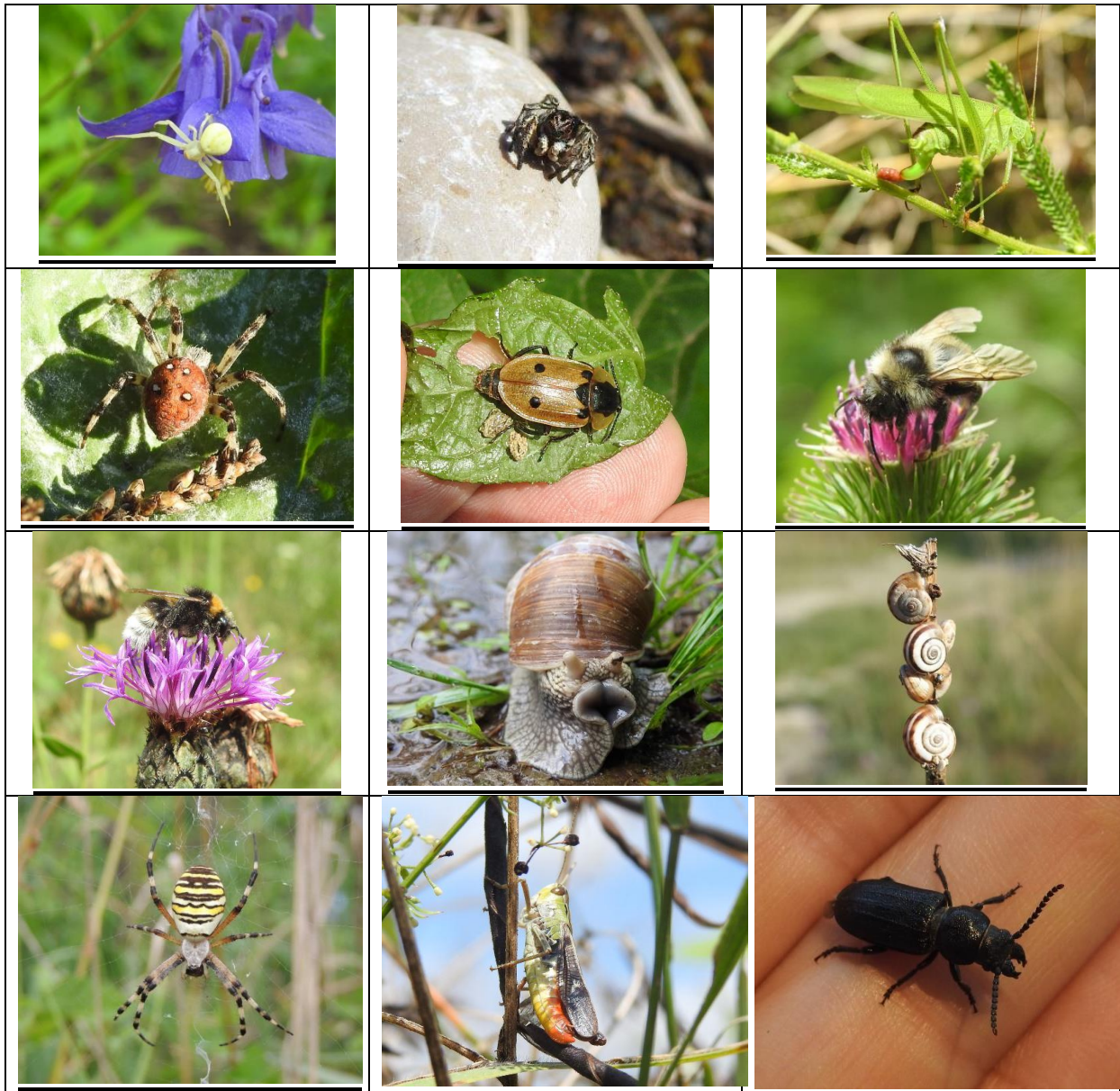












BRAINSTORMING FOR SOLUTIONS:

GREENING OF TAXES (CASE RAADERWALD)

The idea of greening taxes would be the following and would lead to a win-win situation for all concerned.

Valuable natural and semi-natural areas with a higher dedication (industrial/building land) should be redeployed into grassland / forest.

The loss incurred as a result, should be tax deductible from the profits of the next 10 financial years (the difference between the market value of the industrial/building land and the market value of the grassland/forest - or another adequate, fair solution).

This idea would strengthen Austria's business location and make it safer and remove a factor that plays off economy against nature, as it is now against the will of all those involved.

It would also be a strategic response to climate change, preserving biodiversity and effective countermeasures against progressive soil sealing.

Change of street plans

Instead of the currently planned 124 million euro project, that the 2nd Danube bridge Mauthausen is led to the 123a road and by adapting 123a road either through the Raaderwald-area (that would require a total of at least 3 bridges - the 2nd Danube Bridge, the planned foreshore bridge over the Enns Canal and a bridge back across the Enns Canal to the Raaderswald area - further probably a separate motorway junction) or east of Rems respectively to the B1 and thus to the A1 motorway junction St. Valentin, the 2nd Danube bridge is to be connected after crossing the Danube with the bypass 123 Windpassing / Pyburg, which has been completed by 14 million euros in 2017.

This would firstly save taxpayers' money (which could be used in the course of the project for a nature reserve Raaderwald and more), Second, save time (In favor of the commuters a quick solution of a bridge without traffic light over the Danube and without nick-nack to the existing bypass 123), thirdly, the B1 and the bypass 123 would be used. Otherwise, what was built on roads in recent years would seem like a foolish act. Tax money would have been wasted and will continue to be wasted. Of course, more traffic solutions are needed in the Linz area, Renovation work on the Danube bridges should be better coordinated / planned by politicians in the future (and not renovate all the bridges at the same time) What you save is expensive for the economy and the commuters, and is ultimately more expensive for the public sector than a smart, phased renovation plan.

Traffic-App

A traffic app, to be developed, could also provide relief and mitigation in times when there are everlasting traffic jams due to longer (often for years) in cause of construction sites. The commuters and entrepreneurs - here in this specific case from the Machland and the district of Amstetten, record in this app their usually regular scheduled travel times. The app could calculate in advance the peak times, even times for which it is particularly critical for traffic-jams, and the users / commuters, but also the companies, could adjust their travel times or even the working hours, Railways and buses could adapt their offer to it.

Flexibilisation and exchange of habitat types

The province of Lower Austria says it has designated enough oak habitat type 9170 as nature reserves. Perhaps there are too few expulsions for a habitat type 9170 in another federal state and, in exchange with the province of Lower Austria, another habitat type can be protected there. Advantage, that would protect more land, deficiencies due to too few potentially protected habitat types could be avoided.

Of course, this applies to all types of habitat and should be promoted across the EU.

Change of dedication and financial equalization

So that nature does not suffer a fate like the Indians in North America - and only has space in some reserves (National Parks, Natura 2000 areas), moreover, often far from the periphery, in difficult to access areas, because nobody else is interested, each municipality, community would have to declare about 20 - 30% (is just an idea, of course, can be more) of their area as unsalable/nonmarketable natural area. For this, the right of dedication - the spatial planning must be changed urgently, one must declare swiftly and flexibly - without the owners being flushed (by greening the taxes), last natural areas in the central area to taboo zones. Also, fiscal equalization needs to be adjusted, tax money should not only be distributed to the municipalities via the parameter population, but intelligent, predictive parameters should also be introduced, depending on how you want to get the society into something positive - e.g. a community that reaches quota semi-natural areas ((and much can be calculated into it, organic fields, communal areas, private garden areas, roadsides, brownfields, infrastructure areas, semi-natural forests, etc. - there must be only a natural management system) gets more taxpayers' money (of course that can be attributed to other parameters, a community that does more for education, a community that does more for social issues, etc.) - but this is about nature conservation 😊

For one more there could be a bonus, for less just less taxpayer money. This would also be good, so that vacant office buildings and vacant halls in business parks are no longer empty, here, too, a change would be necessary, it can not be that these resources are less attractive than if you build a new business park in the green in the middle of the "cheap nature".

Therefore necessarily change the dedication, with taboos, incentive system in financial equalization etc.

Otherwise you can only see negative for biodiversity in Europe - the existing system can not stop the downward spiral!

Enclosures, parking decks

A question that arises again and again, there are many enclosures in the foothills and alps (even in small communities), Space-saving parking garages and parking decks in cities with expensive properties, but in between, in the suburbs will continue to be built and blocked, forest cleared, sealed meadows, roads are led through valuable natural spaces - you should also use enclosures and parking decks for the purpose of nature conservation in central space. Why not, yes also promotes the economy, also brings jobs?



See more on www.raaderwald.at or the Youtube-Channel Raaderwald
<https://www.youtube.com/channel/UCrXXMNoVdXjEe8S286aTHqQ/videos>



Nature protection?



Nature Protection ☺



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