

COMPLAINT (REQUEST FOR INSPECTION) FORM

To:

The Executive Secretary, The Inspection Panel, The World Bank, MSN: MC 10-1007 1818 H St., NW, Washington, DC 20433, USA. Fax: +1(202)-522-0916. Email: ipanel@worldbank.org

Section 1: Complaint

1. What harm do you believe the World Bank-financed project caused or is likely to cause to you or your community? Please describe in as much detail as possible.

The Oder-Vistula Flood Management Project (OVFMP) in Poland will not only burden the extensive nature reserves (EU Natura 2000 sites, Lower Oder Valley National Park, landscape conservation areas) on the German side, but also on the Polish side (EU Natura 2000 sites, Cedynia Landscape Park and Lower Odra Valley Landscape Park). We are very concerned about the implementation of the measures planned on the Polish side on the Oder, as the cross-border project components are in breach of EU environmental law (in particular the Natura 2000 Directives and the Water Framework Directive) and increase the risk of flooding in the region. We also deplore a frightening lack of involvement of nongovernmental organizations and flood management experts in the development of this project. The project is a barely concealed waterway development project for the still relatively free-flowing Oder River. The previous public participation, especially of German citizens, does not meet the European standard. Thus, there is a lack of information in German and in non-technical language within a reasonable timeframe. The technical quality of the Environmental Impact Assessment is extremely low and systematically obscures the effects of the measures planned on the Polish side on the German protected areas in the Oder valley. Although the World Bank has been endeavoring for many years to examine the projects it supports for their ecological impact, the safeguards of the World Bank have not been fulfilled.

The Internationalpark Unteres Odertal GmbH runs a wilderness school for children and young people at the Teerofenbrücke, especially for pupils and students, and in Criewen, it manages the Brandenburgische Akademie Schloss Criewen, a scientific institution for international conferences and congresses. These projects are supported institutionally by considerable funds from the state of Brandenburg. All topics relating to rural development are the focus of the Brandenburg Academy Schloss Criewen.

2. What is the name of the World Bank project? (If known)

Odra-Vistula Flood Management Project (Project ID: P147460)

3. Where is the World Bank project located? (Please include country name)

Poland, but with transboundary consequences for Germany

	Yes, we live in the project area.
5.	Have you previously reported your concerns to World Bank management? If yes, please provide the details about those communications and explain why you are not satisfied with the Bank's action in response.
	The International park Unteres Odertal GmbH, together with other German nature and environmental protection associations, has approached the World Bank from the very beginning. Personal discussions were also held between the World Bank representatives and the nature conservation associations in 2018 and 2019. The Polish plans for the development of the Odra River are being continued unchanged and unswerving. The influence of the World Bank as a financier on these Polish plans is not yet apparent.
6.	If known, please list the World Bank's operational procedures you believe have not been followed.
	OP 4.01 - Environmental Assessment; OP 4.04 - Natural Habitats; OP 7.50 - Projects on International Waterways
7.	Do you expect any form of retaliation or threats for filing this complaint to the Inspection Panel?
	No, we do not expect any form of retaliation or threats.
	No, we do not expect any form of retaliation or threats.
Section	No, we do not expect any form of retaliation or threats. On 2: Contact Information

10. Complainants' Names (Minimum two names and signatures are required):

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11. We, the undersigned, request the Inspection Panel to investigate the issues described above.

Signatures (More signatures can be sent as an attachment document):

NOTES:

- Please attach supporting documents, if available.
- If you have any difficulty in completing the form, please contact the inspection Panel at <u>ipanel@worldbank.ors</u>
 or by phone: +1-202-458-5200.