



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 also affects the Oder between Hohensaaten and Szczecin and the many adjoining protected areas, such as EU Natura 2000 sites, national parks, protected areas on the German side and landscape parks and Natura 2000 sites on the Polish side. These protected areas have been established to preserve the extraordinarily large biodiversity in the river, as well as the two sides of its banks. **The Lower Oder Valley National Park Foundation (Nationalparkstiftung Unteres Odertal)** was founded in 1995 by the German states of Berlin and Brandenburg, and also by the largest business enterprise in the region, PCK Raffinerie GmbH, and the National Park Association. The aim of the foundation is nature conservation, organic farming, environmental research and environmental education. We consider the implementation of the planned task on the Polish side in the Oder Valley extremely critical, as the cross-border project components violate EU environmental law, in particular the Natura 2000 directives and the Water Framework Directive. In addition, the implementation of the planned measures significantly increases the risk of flooding in the area. Above all, there was a flagrant lack of involvement of non-governmental organizations and flood management experts in the development of this project. Unfortunately, this has resulted that the project is essentially a thinly disguised waterway upgrade project. At its core, it's about channelizing the still free-flowing Oder River. The inclusion of Polish, but also German citizens in no way corresponds to European standards. As such there has been no provision of necessary information in non-technical German. The technical quality of the Environmental Impact Assessment submitted by the Polish side is extremely low and systematically disregards the impact of the planned measures on the German protected areas in the Oder valley. Therefore, the safeguards set by the World Bank have not been met.

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

4. Do you live in the project area?

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.

We have worked closely with other conservation organizations and associations from the outset, including the enforcement of our rights at the World Bank. The Federal Ministry for Economic Cooperation and Development has responded to a letter from the Association of Friends of the German-Polish European National Park Lower Oder Valley from 6/15/2016 by letter dated 8/1/2016. In fact, the deficiencies and damages criticized by us have never been discussed, let alone considered. We believe that the World Bank must live up to its long-standing commitment to reviewing the environmental impact of all measures it supports and, if necessary, realigning them accordingly. The German association representatives met employees of the World Bank in 2018 and 2019 by letter and in person. The associations also participated in the dates of the transboundary environmental impact assessment. This did not lead to a change of the plans on the Polish side.

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.

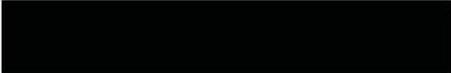
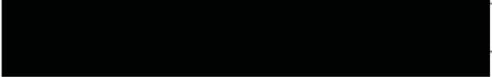
Section 2: Contact Information

8. Are you complainants or a representative of complainants?

Complainants: Representing a complainant or community:

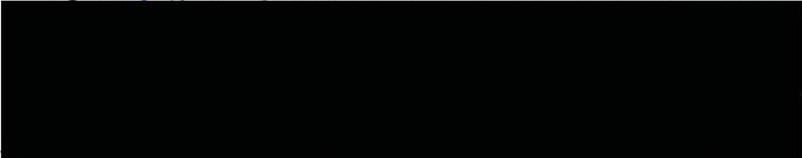
9. Would you like your name and contact details to be kept confidential? *(The Inspection Panel will not disclose your identities to anyone without your prior consent.)* Yes No

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

Complainant 1		Complainant 2	
Name		Name	
Address	Nationalparkstiftung Unteres Odertal Criewen Park 3, Schloss Criewen 16303 Schwedt/Oder	Address	Nationalparkstiftung Unteres Odertal Criewen Park 3, Schloss Criewen 16303 Schwedt/Oder
Phone		Phone	
Email		Email	

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

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

	
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NOTES:

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

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

Complainant 1		Complainant 2	
Name	<input type="text"/>	Name	<input type="text"/>
Address		Address	
<input type="text" value="Nationalparkstiftung Unteres Odertal
Criewen
Park 3, Schloss Criewen
16303 Schwedt/Oder"/>		<input type="text" value="Nationalparkstiftung Unteres Odertal
Criewen
Park 3, Schloss Criewen
16303 Schwedt/Oder"/>	
Phone	<input type="text"/>	Phone	<input type="text"/>
Email	<input type="text"/>	Email	<input type="text"/>

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

Signature (Must be handwritten in an attachment document):

<input type="text"/>	<input type="text"/>
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