locComplaint (Request for Inspection) Form

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

(Please answer the questions below as best as you can. Once the form is submitted, we will contact you to collect any additional necessary information.)

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.

On September 15, 2024, due to the implementation of the task financed by the World Bank loan for ODRA-VISTULA FLOOD MANAGEMENT PROJECT – P147460)

task name: Polish Waters DIP OVFMP-4B.1_2 Modernization and Implementation of Hydrological Measurement Systems), **a construction disaster occurred** at the Stronie Śląskie reservoir, which caused a massive flood wave resulting in enormous damage in the municipalities of Stronie Śląskie and Lądek Zdrój, **including fatalities**.

The disaster is presented in a film commented on by the hydrotechnician, [redacted]. Link to the recoding: [redacted]

The gravity of the disaster is documented also in a movie made by a local photographer, [redacted] subtitled "Niezatapialni" (unsinkable), link: [redacted]

The issue is being investigated by a team of prosecutors from Świdnica town: link to the press release: [redacted]

The disaster mentioned above is also addressed in a document by the Voivodeship Inspector of Building Control available at: link: [redacted] **For your convenience we have translated that document into English.**

Simultaneously with the Stronie Śląskie reservoir disaster during the September 2024 flood, anoother reservoir located n the Nysa Kłodzka cascade (Topola dam) **failed**, where works were carried out under the same projecy, financed by the World Bank loan, this is evidence in the two recordings below:

1 [redacted]

The selection of contractors for works financed by the World Bank loan was conducted not through an open and accessible tender but through a special World Bank procedure of International Competitive Bidding (ICB) without prequalification, in accordance with the World Bank's January 2011 "Guidelines : procurement of goods, works and non-consulting services under IBRD loans and IDA credits and grants by World Bank borrowers", as amended in July 2014. As evidence by the following link:

[redacted]

During the same flood, in September 2024, a hydraulic breach occurred at the Racibórz reservoir, visible in

an educational film by the hydro [redacted]

This hydraulic breach raises serious questions about the future safety of this reservoir.

The reservoir of Racibórz was also constructed with the use of funds from a World Bank loan as a part of ODRA-VISTULA FLOOD MANAGEMENT PROJECT – P147460.

On September 15, 2024, the Roztoki Bystrzyckie reservoir overflowed with an emergency overflow, damaging seriously 13 houses located just below this reservoir (this event was decribed to the Chair Person of the Panel during a video-conference hold on 9 May 2025 by an inhabitant of Wilkanów village , Tomasz Tarciński, who altogether with a mayor of the village Wilkanów managed to collect almost 200 signatures against reservoir of Wilkanów which is to be projected and built altogether with many other "dry reservoirs ", like Goszów, Stójków, Bolesławów as a part of "A Project for Klodzko Dale" being a part of future project:

Building-resilience-to-climate-change-in-water-management

A Polish version of the project for Kłodzko Dale may be founf under [redacted]

Roztoki Bystrzyckie reservoir was built under the following contract:

[redacted]

The damage made by emergency overflow of the reservoir "Roztoki Bystrzyckie" was mentioned in a speech of inhabitant of Roztoki Bystrzyckie, made during "public consultation" of the new project in Kłodzko on 5 March 2025. A mayor of Miedzylesie told that he had to evacuate two villages lying just under the rerservoirs built from the loan of the World Bank:

1) A speech by major of [redacted]

2) A speech by inhabitant of Roztoki village, whose house was dameged by water falling from emergency overflow of the reservoir:

[redacted]

A speech of two residence is shown in the video (link below) and captured with some photographs which we have provided to you in a separate file: Attachment 1 Photos:

[redacted]

During the flood in Kłodzko Valley, no alarm or monitoring systems worked, and no evacuation systems were

utilized despite the financial resources allocated to them from World Bank loans and other EU-funded institutions.

As you can see from the above, we have captured and documented disaster and failures or multiple dams and water reservoirs, all of which had obtained funding from the World's Bank. We are extremely concerned why such failings occurred and we are also extremely concerned as a local community that there are latest plans that involve build of further dangerous dams in our area (location of Goszów, Bolesławów, Stójków, Wilkanów), as a part of the future Project which would be financed from the loan taken from the World Bank.

The name of this big Project will be:**Building-resilience-to-climate-change-in-water-management**

We would like to underline that our local communities are against including new potential reservoirs currently proposed for Stójków, Goszów, and Wilkanów, in this project.

There is not only a complaint from the inhabitants of the village of Wilkanów against the Wilkanów reservoir, but there are also legitimate objections from the village meetings of Goszów and Stary Gierałtów against the Goszów reservoir.

The local population already protested against the build of Goszów and Wilkanów reservoirs back in 2019. During a meeting with the Klodzko Land community in Międzylesie on May 14, 2019, [redacted] representing the World's Bank, promised those gathered in the Hall of the Międzylesie Municipal Office, as well as potential stakeholders of the reservoir construction project, that this project would never be funded by a World Bank loan because of the scale of public protest.

After the flood in September 2024, this project (the construction of the previously contested reservoirs, including the Goszów and Wilkanów reservoirs, as well as the new Stójków reservoir, with a floodwater bypass beyond Lądek Zdrój) was revived. It was presented to the residents of Klodzko Land by [redacted] coordinator of the Odra Vistula Flood Protection Project, in the form of an underdeveloped and error-ridden report visible through a link. During consultations in Lądek Zdrój and Stronie Śląskie, only 54 pages of the so-called Program Synthesis were presented. Link: [redacted]

The proposal by [redacted], Coordinator of the Odra Vistula Project, to use as "flood risk reduction" measures involving build of new dry reservoirs that were already protested in 2019—whose construction and project development would be funded by a World Bank loan for a new climate change adaptation program, is seen as a **lack of basic respect for the residents** of Klodzko Land affected by the September flood, including fatalities caused by the dam disaster. Especially given that the greatest flood-related losses occurred due to the construction disaster at the Stronie Śląskie dam, excavated by Polish Waters with funds borrowed from the World Bank under task DIP OVFMP-4B.1_2.

Despite the positive opinion obtained by Professor Zaleski from the Klodzko County Council for a document that cannot even be called a project proposal, we strongly protest against the construction of the already contested reservoirs in Goszów and Wilkanów, as well as construction of the "new" reservoir in Stójków. There is **no social/community consent** for their design and construction.

It should be emphasized that the necessity to divert floodwaters outside Lądek Zdrój through the planned new Stójków-Rudawka Górna-Rudawka Dolna reservoirs indicates a lack of flood risk reduction by the planned Goszów and Bolesławów reservoirs, which would be located above Stronie Śląskie, increasing rather than reducing the flood risk for this locality. Since there are no river tributaries between Stronie Śląskie and Lądek Zdrój (the distance between these locations is less than 10 km), if the Goszów and Bolesławów reservoirs were to protect Stronie Śląskie, they would automatically also protect Lądek Zdrój.

We believe that the concept of constructing the Stójków reservoir with a water bypass outside Lądek Zdrój and an underground diversion channel (whose construction details and costs are unknown to us similarly, the exact location and capacity of the Stójków-Rudawka Górna-Rudawka Dolna reservoirs), emerged merely to present the World Bank and European financial institutions with paper-based calculations of "flood risk

reduction". Not only do these results not exist (in Stronie Śląskie, out of 1,300 people at risk, 1,100 would still be at risk after the construction of the Goszów and Bolesławów reservoirs), but the concept of bypassing water outside Lądek Zdrój significantly increases the flood threat for the towns lying below (Radochów, Trzebiezowice, Oldrzychowice), which were significantly affected during the September disaster.

Attention should be drawn to the fact that the proposed "new" program from [redacted] returns to outdated concepts from 2004 and 2006 (Odra 2006, which is a navigation program aimed at constructing the so-called Oder Waterway, and the study by Hydrprojekt (later SWECO) titled "Flood Protection Study of the Klodzko Basin with special regard to Klodzko"). For example, the concept of constructing the multifunctional Kamieniec Ząbkowicki reservoir is yet to be developed:

Link: [redacted]

IMPACT OF THE CATATSTROPHY ON THE LOCAL COMMUNITY

In the catastrophic flood wave caused by the collapse of the dam in Stronie Śląskie, **9 people died** (according to official data, unofficial data spoke of a much higher number of people) , many houses were destroyed (many of them do not exist anymore), road infrastructure (roads and bridges) was destroyed, the river carried away many cars, a huge number of people lost all their possessions.

There is uncertainty and concern about plans to build more dams that would be constructed under the Nysa Klodzka Program: [redacted] which is to be a part of a future big project, financed from the loan from the World Bank: **Building-resilience-to-climate-change-in-water-management**

WHAT DO WE ASK OF YOU

First of all, we ask the World Bank Board to **suspend/stop** any future loan for Polish Government (Polish Waters) which could potentially lead to construction of other dangerous dams in our area (Goszów, Bolesławów, Stójków, Wilkanów), further:

- A thorough inspection by the World Bank Inspection Panel and OLAF into the appropriateness and manner of financial resource utilization within the task: Polish Waters DIP OVFMP-4B.1_2 Modernization and Implementation of Hydrological Measurement Systems, which weakened the stability of existing structures, leading to the construction disaster of the Stronie reservoir on September 15, 2024.
- An investigation to determine why the modernized and implemented hydrological measurement systems under the task mentioned above did not provide information to warn the residents of Stronie Śląskie and Lądek Zdrój about the impending disaster of the Stronie Śląskie reservoir, and why no evacuation was ordered in time, which could have significantly reduced the flood losses caused by the reservoir disaster, potentially avoiding fatalities.
- A review of the execution of tasks funded by the World Bank loan and European Banks, involving alarm scenarios developed by SWECO before 2020. According to information from the collaborator at SWECO, such scenarios were prepared by SWECO as a "Program consultant," but they were not implemented, wasting funds from Polish taxpayers.
- Public disclosure of the agenda for visits by World Bank representatives in Poland, similar to the visit mentioned in the link: [redacted]

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

Name in Polish: Wody Polskie „**DIP OVFMP-4B.1_2** Modernizacja i wdrożenie systemów pomiarów hydrologicznych

which in English is: Polish Waters **DIP OVFMP-4B.1_2** Modernization and implementation of hydrological measurement, control, and telecommunication systems at hydrotechnical facilities.

The project for implementation and expansion of the hydrological measurement system at hydrotechnical facilities is being carried out as part of the Odra and Vistula River Basin. Flood Protection Project. The aim of modernization is to adapt facilities for data transmission for the needs of operational centers and monitoring.

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

Country: Poland; Province, City: Stronie Śląskie, the Kłodzko County

4. Do you live in the project area?

Yes, and I represent a community that lives in the area. Collected signatures show over 30 people who live in the area affected by the dam disaster in Stronie Slaskie as well as the name of local villages they live in

5. Have your concerns previously been reported to the World Bank? If yes, please provide the details about those communications and explain why you are not satisfied with the Bank's response.

We have had a videoconference organised by Mister [redacted] with the IP Chairperson [redacted] on Friday 9 May 2025 and hope for an IP Panel to start an investigation. We had to fill in this official form.

Also back in 2019, in a complaint to the IPN, I raised the argument about the construction of dams using "multifunctional dam" technology instead of "dry dam" technology. I pointed out the violation of the Water Framework Directive, the Habitats Directive, and the Birds Directive (eagle owl), as well as the lack of flood control effectiveness of the four dams being implemented. The combined operation of the four reservoirs in: Szalejów Dolny, Roztoki Bystrzyckie, Krosnowice, and Boboszów, reduced the height of the flood wave with a probability of p=0.01 at the Kłodzko gauge by only 14 cm.

I am currently pointing out the fact that such dams have not proven to be effective for the nearby localities. The Roztoki Bystrzyckie dams not only failed to save Roztoki town but also posed an additional threat to the residents: as a result of water discharge from the emergency spillway of the Roztoki dam, 13 houses located directly below the dam developed cracks.

We are grateful for the time provided and would like to kindly ask now for actions on your end, beyond requesting us to fill further forms to document our grievance. Thank you.

6. If known, please list the World Bank's operational policies procedures you believe have not been followed.

7. Do you expect any form of retaliation or threats for filing this complaint?

We cannot rule this out, [redacted] was physically attacked by an employee of EKO-WOD company while making pictures of realisation of another Polish Waters task financed from the loan of the World Bank on Biała Lądecka River

8. In addition to receiving information about the Compliance investigation process, would you also like to receive information about the option of dispute resolution?

Yes

Section 2: Contact Information

9. Are you complainants or a representative of complainants*?

Complainants: □ Representing a complainant or community: ☒ Other: □ (Please explain)

10. Would you like your name and contact details to be kept confidential? (We will not disclose your identities to anyone without your prior consent.) Yes □ No ☒

11. Complainants' or representatives' names (minimum two names and signatures are required):

	Complainant /Representative 1	**Complainant /Representative 2**
Name	[redacted]	[redacted]
Address	[redacted]	[redacted]
Phone	[redacted]	[redacted]
Email	[redacted]	[redacted]

12. By completing and submitting this form, we authorize the Inspection Panel to investigate the issues as described in this form.

Signature 1	**Signature 2**
[redacted]	[redacted]

Signatures (more signatures can be sent as an attachment):

NOTES:

- **If you are a representative of complainants, we will need a letter from the complainants authorizing you to represent them.*
- *Please attach supporting documents, if available.*
- *If you have any difficulty in completing the form, please contact the World Bank Accountability Mechanism at Email: ipanel@worldbank.org or by phone: +1-202-458-5200.*

Please follow to the next page for the attached full list of signatures from individuals agreeing to this complaint. Each signature captures name, last name, address, ID number

Attachments.

- Attachment 1

- Attachment 2, signatures from local community

LISTA OSÓB POPIERAJĄCYCH WNIOSEK O KONTROLĘ BANKU ŚWIATOWEGO
w przedmiocie PRZYCZYN KATASTROFY ZBIORNIKA W STRONIU ŚLĄSKIM
15-09-2024 w związku z zadaniem Wody Polskie DIP OVFMP-4B.1_2 Modernizacja i wdrożenie systemów pomiarów hydrologicznych, finansowanym z pożyczki Banku Światowego

	Imię i nazwisko	Adres	Pesel	Kontakt
1.	[redacted]			
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imię nazwisko adres pesel email

[redacted]

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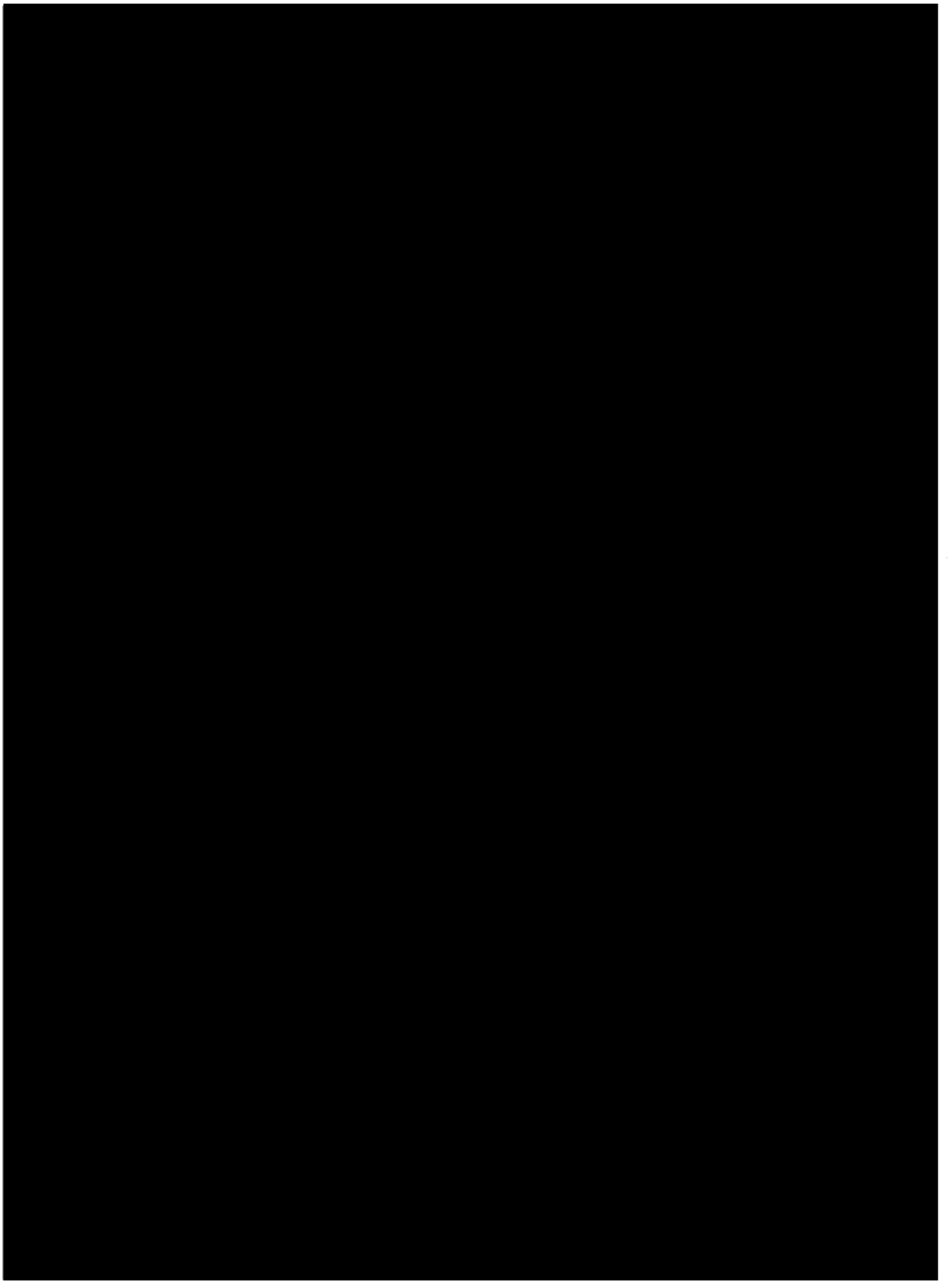

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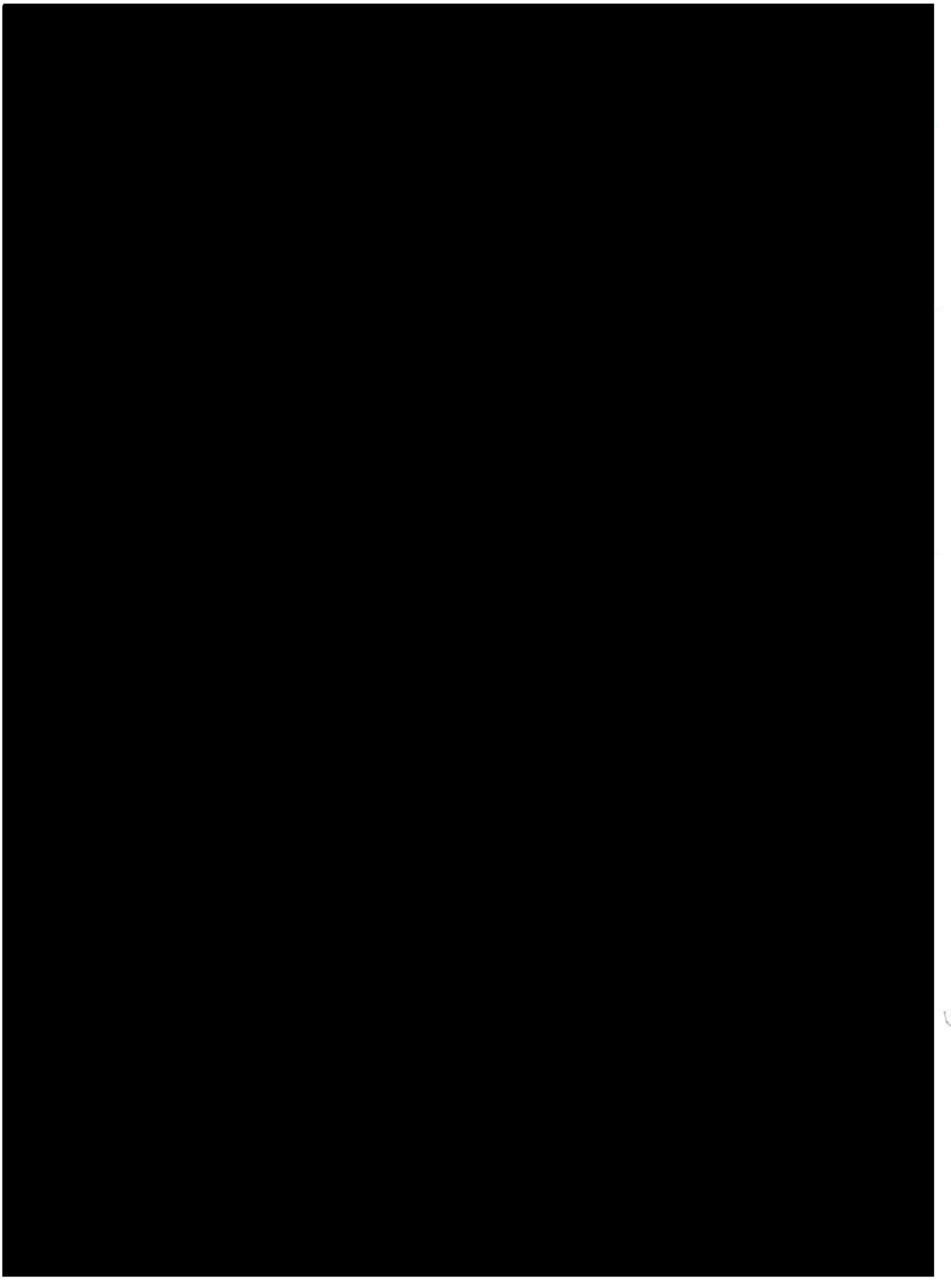

1. **President of the World Bank**
2. **President of the World's Bank Inspection Panel**
3. **Vice President of the World Bank for Europe**
4. **OLAF**
5. **World Bank Delegation in Poland**

Application to the President of the World Bank, the President of the World's Bank Inspection Panel, and OLAF for a thorough review of the appropriateness use of funds from the World Bank loan and the causes of the construction disaster of the dam in Stronie Śląskie on September 15, 2024, as well as major failures during the same flood of two other dams in the Nysa Kłodzka cascade (Topola and Kozielno), resulting from the implementation of the task: Polish Waters DIP OVFMP-4B.1_2 Modernization and Implementation of Hydrological Measurement Systems. This task is part of the concluding Odra and Vistula Flood Protection Program.

As the community of the Kłodzko Land, severely impacted by the consequences of the dam disaster in Stronie Śląskie on September 15, 2024, caused by earthworks conducted on the dam by PGW Polish Waters under the task "**Polish Waters DIP OVFMP-4B.1_2 Modernization and Implementation of Hydrological Measurement Systems**," we demand:

1. A thorough inspection by the World Bank Inspection Panel and OLAF into the appropriateness and manner of financial resource utilization within the task: **Polish Waters DIP OVFMP-4B.1_2 Modernization and Implementation of Hydrological Measurement Systems**, which weakened the stability of existing structures, leading to the construction disaster of the Stronie reservoir on September 15, 2024.
2. An investigation to determine why the modernized and implemented hydrological measurement systems under the task mentioned above did not provide information to warn the residents of Stronie Śląskie and Lądek Zdrój about the impending disaster of the Stronie Śląskie reservoir, and why no evacuation was ordered in time, which could have significantly reduced the flood losses caused by the reservoir disaster, potentially avoiding fatalities.
3. A review of the execution of tasks funded by the World Bank loan and European Banks, involving alarm scenarios developed by SWECO before 2020. According to information from the collaborator at SWECO, such scenarios were prepared by SWECO as a "Program consultant," but they were not implemented, wasting funds from Polish taxpayers.
4. **Public disclosure of the agenda for visits by World Bank representatives in Poland, similar to the visit mentioned in the link:** [redacted]

As a large group of stakeholders in future World Bank projects in Poland, we wish to engage in direct discussions with World Bank representatives during their routine visits to Poland related to the settlement of the concluding Odra Vistula Program to express our opinions on the Flood Risk Reduction Program in the Nysa Kłodzka basin.

5. We demand a response from the World Bank and the European financial institutions financing the Odra Vistula Project to the fact that works on the Odra, financed by the World Bank loan and loans (or grants) from EU financial institutions, were carried out **illegally** against administrative court rulings, as described in the article: link: [redacted]

JUSTIFICATION

On September 15, 2024, due to the implementation of the task financed by the World Bank loan for the Odra and Vistula Flood Protection Program (task name: **Polish Waters DIP OVFMP-4B.1_2 Modernization and Implementation of Hydrological Measurement Systems**), a construction disaster occurred at the Stronie Śląskie reservoir, which caused a massive flood wave resulting in enormous damage in the municipalities of Stronie Śląskie and Lądek Zdrój, including fatalities.

The disaster is presented in a film commented on by the hydrotechnician, Dr Krzysztof Radzicki, who believes that the flow rates through the Stronie reservoir as presented on the official PGW Polish Waters website are significantly overestimated. Link to the recoding: [redacted]

The issue is being investigated by a team of prosecutors from Świdnica: link to the press release: [redacted]

It is also addressed in a document by the Voivodeship Inspector of Building Control available at: link: [redacted]

Simultaneously with the Stronie Śląskie reservoir disaster during the September 2024 flood, two other reservoirs in the Nysa Kłodzka cascade (Topola and Kozielno) failed, where works were carried out under the same task, financed by the World Bank loan:

[redacted]

Failures of the Topola and Kozielno dams caused substantial flood damages in the town of Paczków. In parallel, in Lewin Brzeski, flood embankments broke due to poorly designed and executed works carried out by PGW Polish Waters.

The selection of contractors for works financed by the World Bank loan was conducted not through an open and accessible tender but through a special World Bank procedure of International Competitive Bidding (ICB) without prequalification, in accordance with the World Bank's January 2011 "Guidelines : procurement of goods, works and non-consulting services under IBRD loans and IDA credits and grants by World Bank borrowers", as amended in July 2014.

Link:https://wroclaw.wody.gov.pl/zamowienia-publiczne/postepowania-przetargowe/948-ovfmp-4b-1-2-modernizacja-i-wdrozenie-systemow-pomiarow-hydrologicznych-sterowania-i-teletechnicznych-na-obiektach-hydrotechnicznych

During the same flood, in September 2024, a concerning hydraulic breach occurred at the Racibórz reservoir, visible in an educational film by the hydro technician, Dr Krzysztof Radzicki.

Video Link: https://www.youtube.com/watch?v=vEK70GvEVk0

This reservoir was also constructed with use of funds from a World Bank loan as part of the Odra Vistula Program loan.

During the flood, no alarm or monitoring systems worked, and no evacuation systems were utilized despite the financial resources allocated to them from World Bank loans and other EU-funded institutions.

Therefore, our demands are justified and appropriate.

cc.

1. **Prime Minister, Mr. Donald Tusk**