



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 German-Polish Border Oder with many protected areas on both sides of the German-Polish frontier (EU Natura 2000 sites, national parks and protected landscapes on the German side, on the Polish in addition to EU Natura 2000 sites also landscape parks). The Lower Oder Valley between Hohensaaten and Szczecin is characterized by a great diversity of species in the river and on its banks. **The Association of Friends of the German-Polish European National Park Lower Oder Valley e.V.** (Verein der Freunde des Deutsch-Polnischen Europa-Nationalparks Unteres Odertal e.V.) was founded in 1992 to protect nature, to promote organic farming, natural science and environmental education and is, in order to achieve this goal, one of the largest landowners in the federal state Brandenburg. However, we are very concerned about the planned project implementation on the Oder River, as the cross-border project components are in breach of EU environmental law, in particular the Natura 2000 directives and the Water Framework Directive. In addition, the flood risk for the landscapes on both sides of the river is not lower, but in fact higher if the planned measures are to be implemented

Another criticism is the significant lack of timely and comprehensive involvement of non-governmental organizations and flood management experts on both sides of the border. Unfortunately, this has resulted in a project that is essentially a waterway development project. Essentially, it is about channelizing the still free-flowing Oder River to a considerable extent. For flood protection, these measures are rather detrimental. Furthermore, the public participation of the Polish, but above all the German citizens, required by EU law, does not correspond to the European standards. For example, there was no information in German or non-technical language within a reasonable timeframe. The quality of the environmental impact assessment submitted so far 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. 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.

The Association of Friends of the German-Polish European National Park Lower Oder Valley. was one of the first nature conservation associations to write directly to the World Bank by letters dated 9/15/2015 and 6/15/2016 and to the German Federal Ministry for Economic Cooperation and Development by letter dated 6/15/2016. The Association of Friends of the German-Polish European National Park Lower Oder Valley has received only a reply from the World Bank by letter dated 10/29/2015 and a reply from the German Federal Ministry for Economic Cooperation and Development by letter dated 8/1/2016. Unfortunately, the reality looks different from what was promised in the responses.

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.





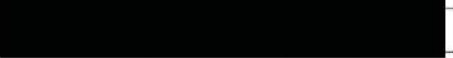

Section 2: Contact Information

8. Are you complainants or a representative of complainants?

Complainants: Representing a complainant or community:

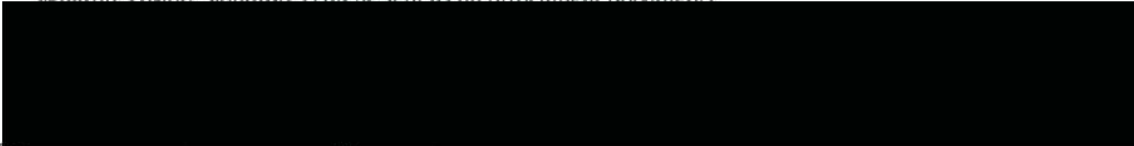
9. Would you like your name and contact details to be kept confidential? (*The Inspection Panel will not disclose your identities to anyone without your prior consent.*) Yes No

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

Complainant 1		Complainant 2	
Name		Name	
Address	Verein der Freunde des Deutsch-Polnischen Europa-Nationalparks Unteres Odertal e.V. Criewen Park 3, Schloss Criewen 16303 Schwedt/Oder	Address	Verein der Freunde des Deutsch-Polnischen Europa-Nationalparks Unteres Odertal e.V. 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):



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.