



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 is expected to have a significant negative impact on many designated nature reserves on both sides of the river. For example, the EU Natura 2000 sites, on the German side a national park, on the Polish side two landscape protection parks and the great biodiversity still to be found there in the river itself, and also on its banks. **The Öko Agrar GmbH** manages the meadows and pastures in the National Park on the German side to a considerable extent with year-round free-range cattle and horses. Our business is not only committed to economic success, but also to nature conservation, and species and animal-friendly grazing. We depend on healthy and unadulterated environment for our work.

We are very skeptical about the measures planned by the Polish side in the Oder valley, as the cross-border project components are in breach of EU environmental law, the EU Natura 2000 directives and EU Water Framework Directive. In addition, the measures do not reduce the flood risk for the region but increase it. There was also a significant lack of involvement of non-governmental organizations and flood management experts in the development of this project. That is why the project is also a barely obscured waterway development project. Basically, the Oder, which until now has been able to flow freely in essential parts, should be upgraded for shipping and channelized. We also criticize the lack of public participation, not only Polish but also German citizens, which in no way meets European standards. This concerns the provision of timely information in German and non-technical language. Technically and scientifically, the quality of the Polish Environmental Impact Assessment is extremely low and systematically obscures the impact of the planned measures on the German protected areas in the Lower Oder Valley. The World Bank does not live up to its own claim by financing such a measure. Many years ago, the Bank made it its mission to critically review the projects it supports for their environmental impact and environmental impact. To this day, this mission has never been fulfilled.

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.

In the circle of the German conservation and environmental protection associations, the Öko Agrar GmbH Unteres Odertal has been committed from the beginning to a sensible project orientation. Several discussions between the German representatives of the association and World Bank staff took place in 2018 and 2019.

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	<input type="text"/>	Name	<input type="text"/>
Address	<input type="text"/> Öko Agrar GmbH Unteres Odertal e.V. Criewen Park 3, Schloss Criewen 16303 Schwedt/Oder, Germany	Address	<input type="text"/> Öko Agrar GmbH Unteres Odertal e.V. Criewen Park 3, Schloss Criewen 16303 Schwedt/Oder, Germany
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.

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.