

ENVIRONMENTAL DECISION [*decision on environmental conditions*]

GWOS.6220.12.10.2018

Pursuant to Article 71(2)(2), Article 75(1)(4), Article 84 and Article 85(1) of the Act of 3 October 2008 on publishing information about the environment and its conservation, public participation in environmental protection and on environmental impact assessments (Polish Journal of Laws 2008, item 2081, as amended; hereinafter: EIA Act), in conjunction with Article 104 of the Code of Administrative Proceedings of 14 June 1960 (Polish Journal of Laws 2008, item 2096, as amended), having examined the application for environmental permit dated 27 November 2018, filed by the Investor, **State Water Holding Polish Waters, Regional Water Management Board in Szczecin, ul. Tama Pomorzańska 13A, 70-030 Szczecin**, represented under a power of attorney by Ms **Krystyna Araszkiwicz**, acting based on the following documents:

- 1) 'Project Information Sheet',
- 2) Opinion of the Regional Director for Environmental Protection in Gorzów Wielkopolski, ref.: WZŚ.4220.336.2018.PT, dated 27 December 2018 (date of receipt: 27/12/2018),
- 3) Opinion of the State District Sanitary Inspector in Ślubice, ref.: NZ 772-6-26/18, dated 27 December 2018 (date of receipt: 31/12/2018);
- 4) Opinion of the Minister of Maritime Economy and Inland Waterways, ref.: DOK.DOK2.9750.1.2.2019.SK PW: 75965, dated 26 February 2019 (date of receipt: 1/3/2019),

I. I hereby conclude that the project titled *'The construction of docking-mooring infrastructure on Lower Odra River and on boundary sections of Odra River as well as new aids*

to navigation at km 607.5 of The Oder river, carried out as part of the Odra-Vistula Flood Management Project' does not require an environmental impact assessment.

II. I stipulate the following conditions and requirements for the execution and operations stages:

- the works that interfere in the river channel should be carried out only within the planned icebreaker mooring locations;
- the method of managing dredge spoil should be determined in line with separate regulations governing waste management, upon obtaining the laboratory test results for such spoil;
- if any harmful substance is released to the environment, in particular due to equipment failure implying the leak of fuel, lubricant or oil, it is required to apply sorbents for precipitating such containments, appropriate for the type of substance;
- to ensure adequate protection of water against contamination, the equipment to be used during construction should be fully operational and should meet the requirements for its admission for operation;
- any vessels remaining near the project area should be maintained in a technical condition ensuring adequate protection against contamination with harmful substances, in particular oil derivatives.

III. Project specification is attached to this decision.

JUSTIFICATION

On 27 November 2018, we received an application, filed by the Investor, State Water Holding Polish Waters, Regional Water Management Board in Szczecin, ul. Tama Pomorzańska 13A, 70-030 Szczecin, represented under a power of attorney by Ms Krystyna Araszkiwicz, for issuing the environmental permit for the project titled *'The construction of docking-mooring infrastructure on Lower Odra River and on boundary sections of Odra River as well as new aids to navigation at km 607.5 of the Oder river, carried out as part of the Odra-Vistula Flood Management Project'*. Having confirmed that the application is complete, we have initiated an administrative procedure in the case, which we have notified to the parties by the letter dated 12 December 2018 (ref.: GWOŚ.6220.12.2.2018).

The project will involve the construction of mooring places for icebreakers. Eight such facilities are planned from the mouth of the Nysa Łużycka to Szczecin. The project covers a

construction of mooring facilities at km 607.5 of The Oder river, at the plot No. 183, precinct 0001 Górzycyca, in Górzycyca commune, upstream of Ługi Górzycyckie village. The mooring facility will be located parallel to the river axis, approx. 5 m from the waterway boundary. The designed total length of mooring line is around 90 m. The dolphins will be spaced at 10 to 30 m. The pile diameter and steel grade will be chosen at the stage of building permit design. The piles will be made of prefabricated pipes adjusted to the designed length. Ready-made prefabricated pipes will be inserted into vibrating hammer jaws with a lift. Once the jaws clamp, the pipe will be positioned centrally in the location of the pile. The planned mooring places will be marked upstream and downstream of the facility with appropriate signs used at inland waterways.

The project also assumes the construction of a jetty to connect the mooring line with the bank. The project is likely to involve related dredging works (if deemed necessary) to ensure a depth adequate for icebreakers. The works should be performed in reference to medium water level necessary to maintain transport parameters of 1.8 m, or to the river channel elevation. The medium-low water level (MLW) in Ługi Górzycyckie is +12.88 m a.s.l., and the current bed elevation is +11.26 to +9.35 m a.s.l. According to the information presented in the project information sheet, currently there are designed works carried out, and at this stage it is impossible to specify the quantity of material to be excavated. The project location was chosen, as it is close to the existing embankment road, which makes it possible to provide a temporary connection with the mooring facility.

Pursuant to Article 75(1)(4), in this case the authority competent to issue the environmental permit is the head of commune or town mayor. For this project, due to its classification and location, the authority competent to issue the environmental permit is the Head of Górzycyca Commune.

Since in accordance with § 3(1)(63)(b) of Regulation of the Council of Ministers of 9 November 2010 on projects which may materially affect the environment (Polish Journal of Laws 2016, item 71), the planned project is classified as a project which may materially affect the environment, pursuant to Article 64(1) of the EIA Act, by the letter dated 12 December 2018 we have requested the Regional Director for Environmental Protection in Gorzów Wlkp., the State District Sanitary Inspector in Słubice and the State Water Holding Polish Waters to issue an opinion on whether the project requires an environmental impact assessment.

The Head of Górzycyca Commune requested a decision on whether it is required to conduct the environmental impact assessment and, if so, then on the scope of the environmental impact report, and on 19 December 2019 he received the letter No. SZ.RZŚ.436.1.429.2018.AP, by which the State Water Holding Polish Waters forwards the letter of the Head of Górzycyca Commune, dated 12 December 2018, No. GWOŚ.6220.12.5.2018, to the competent authority, that is the

Minister of Maritime Economy and Inland Waterways, invoking Article 77(1)(4) of the Act of 3 October 2008 on publishing information about the environment and its conservation, public participation in environmental protection and on environmental impact assessments (Polish Journal of Laws 2018, item 2081, as amended) and Article 397(2) of the Water Law of 20 July 2017 (Polish Journal of Laws 2018, item 2268, as amended).

By letter No. DOK.DOK2.9750.1.1.2019.SK PW: 70344, dated 3 January 2019 (received on 8/1/2019), the Minister of Maritime Economy and Inland Waterways requested for supplementing the application for the opinion on the project which may materially affect the environment, that is *'The construction of docking-mooring infrastructure on Lower Odra River and on boundary sections of Odra River as well as new aids to navigation at km 607.5 of Oder river carried out as part of the Odra-Vistula Flood Management Project'*, and identified the issues to be explained. In consequence, by letter No. GWOŚ.6220.16.6.2018 dated 14 January 2019, the Head of Górzycza Commune requested the Applicant to supplement the application, indicating the defects stated in the letter sent by the Minister of Maritime Economy and Inland Waterways.

On 4 February 2019, the Office of Górzycza Commune received a letter No. PODDOW-ZPT.071.4.1.2018, dated 31 January 2019. It was accompanied by relevant explanations. By letter No. GWOŚ.6220.12.7.2018 dated 6 February 2019, the authority carrying out the proceedings forthwith sent Investor's explanations to the Minister of Maritime Economy and Inland Waterways.

The Minister of Maritime Economy and Inland Waterways, by letter No. DOK.DOK2.9750.1.2.SK PW: 75965, dated 26 February 2019 (date of receipt: 1/3/2019), pursuant to Article 64 para. 1(4) and para. 3a of the Act of 3 October 2008 on publishing information about the environment and its conservation, public participation in environmental protection and on environmental impact assessments (Polish Journal of Laws 2018, item 2081, as amended), has stated that the project does not require an environmental impact assessment, indicating that the environmental permit must include the following conditions and requirements for the execution and operation stages:

- the works that interfere in the river channel should be carried out only within the planned icebreaker mooring locations;
- the method of managing dredge spoil should be determined in line with separate regulations governing waste management, upon obtaining the laboratory test results for such spoil;
- if any harmful substance is released to the environment, in particular due to equipment failure implying the leak of fuel, lubricant or oil, it is required to apply sorbents for

- precipitating such containments, appropriate for the type of substance;
- to ensure adequate protection of water against contamination, the equipment to be used during construction should be fully operational and should meet the requirements for its admission for operation;
 - any vessels remaining near the project area should be maintained in a technical condition ensuring adequate protection against contamination with harmful substances, in particular oil derivatives.

The Minister of Maritime Economy and Inland Waterways has emphasized that the project is carried out as part of Task 1B.3/2, titled ‘Construction of mooring facilities on the lower and border Oder river and new waterway signage’, which covers a construction of mooring facilities at the section of the Oder river from the mouth of Nysa Łużycka to Szczecin, and installation of new waterway signs. The task is carried out as part of the Odra-Vistula Flood Management Project (POPDOW), and aims at allowing safe and effective ice-breaking.

The task No. 1B.3/2 is included in the Masterplan for the Oder catchment area as a project which does not have an adverse impact on a good water condition or does not impair that condition (ID: 3_393_O). Neither task No. 1B.3/2 nor the project concerned by the application were covered by the current water management plan for the Oder catchment area as projects that pose a risk to achieving the environmental objectives.

The project assumes the construction of a jetty to connect the mooring line with the bank. Dredging works are probable (if deemed necessary) to ensure a depth adequate for icebreakers. The works should be performed in reference to medium water level necessary to maintain transport parameters of 1.8 m, or to the river channel elevation. The medium-low water level (MLW) in Ługi Górzyckie is +12.88 m a.s.l., and the current bed elevation is +11.26 to 9.35 m a.s.l. According to the information presented in the project information sheet, currently there are designed works carried out, and at this stage it is impossible to specify the quantity of material to be excavated. The project location was chosen, as it is close to the existing embankment road, which makes it possible to provide a temporary connection with the mooring facility.

The project will be executed within one surface water body (JCWP) and one ground water body (JCWPd):

- PLRW60002117999 The Oder River from the Nysa Łużycka to the Warta – a monitored, heavily modified water body with a poor condition; environmental objective: good ecological potential, possibility of migration of aquatic life at the section of the important watercourse, good chemical condition. Risk of non-achieving the environmental objectives: exists; a deadline extension was allowed to achieve the environmental objective – the deadline to achieve a good water condition was set at 2027. This part of water body is not intended for water intake for the

purposes of providing water for human consumption, nor is it intended for leisure purposes, including swimming.

- PLGW600040 – chemical condition: good; quantitative status: good; environmental objective: maintaining a good chemical condition and quantitative status; risk of non-achieving the environmental objectives: no risk. A part of the water is intended for water intake for the purposes of providing water for human consumption.

In addition, according to the Minister of Maritime Economy and Inland Waterways, since the project is carried out within one surface water body, the identified impacts will be minor and will not permanently deteriorate the biological, physico-chemical or hydro-morphological elements. The assessment of whether the project may affect the possibility to achieve the environmental objectives was conducted with regard to available monitoring information about the condition of water (data provided by the Provincial Inspectorate for Environmental Protection; from 2017 for the JCWP, from 2016 for the JCWPd). Neither the execution nor the operation of the project will cause any inflow of contaminants into ground water, so it will not deteriorate its condition.

Given the scope and scale of the project, it will not adversely affect the possibility to achieve the environmental objectives set in the applicable water management plan in the Oder river catchment area for the abovementioned surface water bodies and groundwater bodies. The impacts implied by the project execution will mainly occur at the construction stage and will be short, and temporary. They will particularly entail a temporary impairment of the physical condition of water due to delivery of fine fractions caused by re-deposition of bottom sludge and re-inclusion of suspended matters during the vibration of dolphins and a possible failure and contamination of water during the operation of machinery and equipment in the river channel (fuel leakage).

According to the Minister of Maritime Economy and Inland Waterways, the project will not change the width or profile of the river channel. The only interference in this regard may arise from required auxiliary dredging works, which are to provide an adequate depth in the icebreaker mooring area. According to the quality evaluation of bottom sludge, conducted in 2015, the Oder river channel, near the planned mooring facility, contains sludge that is chemically classified as ‘moderately contaminated’. The anticipated project impacts will be short and limited in space. They will not have a significant impact on the Natura 2000 areas, nor will they cause the loss of biodiversity. In accordance with Article 16(32)(c) of the Water Law, the JCWP No. PLRW60002117999 is an area sensitive to eutrophication caused by municipal contaminants, and an area intended for the protection of habitats or species, as referred to in the Nature Conservation

Act of 16 April 2004, where the maintenance or improvement of water condition is an important protection factor (Article 16(32)(d) of the Water Law). The project will have no adverse effect on the possibility to achieve the environmental objectives for the mentioned areas. The issue of cumulative impacts was considered with a particular regard to Task 1.B.3 of the POPDOW project, that is '*Construction of mooring facilities*', and Task IB.2, that is '*Modernisation works at the border Oder river*'. Considering the nature of the projects covering the construction of mooring places, which do not materially alter the physical characteristics of the course of water within the water body, the cumulative impacts were mostly analysed for the execution stage. The planned mooring places are arranged at large intervals, so no direct cumulative impacts are foreseen, which could be caused by the re-deposition of bottom sludge. The impacts due to the construction and use of mooring places are only local, so they will not prevent the achievement of the environmental objectives set for the water bodies covered by the project. The construction of mooring places will be coordinated with the modernisation works to be performed at the border Oder river, which are a separate project, which is currently under the procedure for issuing the environmental permit. Task 1.B.2 will be carried out in stages. For the upcoming time, the plan assumes the implementation of Stage 1, which covers the removal of main areas that restrict the operation of icebreakers and river navigation. Stage 2 will be implemented later.

The project assumes the following mitigation measures to minimise the adverse impact on the environment, including on the quality of water:

- the works interfering in the Oder river channel will be carried out beyond the spawning and spawn incubation season, which lasts from 1 March to 30 June;
- the trees or bushes existing in the project area will not be cleared;
- during execution, there will be used only such raw materials and construction products which will not deteriorate the environmental condition (gravel, sand, prefabricated building materials). The construction materials to be used must have technical approvals and certificates admitting them for use in construction.

Given the requirements stipulated in the Water Framework Directive, it is required to maintain a good condition/potential of water, both at the execution and operation stages. Therefore, the actions taken should ensure achievement of the environmental objectives referred to in Articles 56, 57, 59 and 61 of the Water Law.

However, the project is subject to the conditions and requirements which must be contained in the environmental permit. In this particular project, we should indicate that, even if the environmental impact assessment is not required, it is reasonable for the environmental permit to include the detailed scope of the project in terms of its execution and possible environmental

impact, which also covers the conditions and requirements set out in the opinion issued by the Minister of Maritime Economy and Inland Waterways.

The State District Sanitary Inspector in Ślubice, by his letter of 27 December 2018 (received on 31/12/2018), ref.: NZ 772-6-26/18, having considered the health and sanitary aspects of the conditions stated in Article 63(1) of the quoted Act, in particular the type and characteristics of the project, its location (with a particular focus on environmental hazards), especially with the existing use of the land, as well as the type and scale of possible impact on human health in reference to the conditions listed in items a) and b), has concluded that there is no need to conduct the environmental impact assessment for the project.

When substantiating his decision, the State Sanitary Inspector has indicated that the project assumes a construction of dolphins (mooring piles) by installing prefabricated steel pipes to be rammed into ground directly at a specified location using a vibrating hammer, so it is possible to create in the pipes a so-called 'ground plug' (which protects the pile against collapsing). The pipe sections projecting over the ground will be additionally filled with sand, protected by flat-sheet heads and finished with bonds. The planned jetty will also be made of steel and include protective railings, and will be founded on separate supporting piles, and the 'exit to the bank' will be specified during construction (concrete and/or steel steps are planned).

As the construction works will be carried out from water, all sanitary facilities will be located on the vessels used for the works. Also the vessels circulating on inland water, which are used on the Oder river, have appropriate sanitary facilities, which should be properly monitored to minimise the risk of water contamination.

The planned mooring facility will be labelled with the signs used on waterways, and the project itself will be adapted for the mooring of vessels carrying dangerous goods, called ADN, which are specified in the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (Polish Journal of Laws 2017, item 1719).

The Regional Director for Environmental Protection in Gorzów Wlkp., in his letter dated 27 December 2018 (received by this Office on 27/12/2018), ref.: WZŚ.4220.336.2018.PT, having analysed the enclosed documents and the project information sheet, and having considered all the conditions laid down in Article 63(1) of the EIA Act, has concluded that the project does not require an environmental impact assessment.

Analysing the information on the planned project, as presented in the information sheet enclosed with the application, and considering the aforementioned opinions and all the conditions laid down in Article 63(1) of the cited Act, the authority has stated as follows:

The planned project will involve the construction of mooring places for icebreakers, with the aim to facilitate safe and effective ice-breaking on the Oder river. Eight such facilities are

planned from the mouth of Nysa Łużycka to Szczecin. The project covers a construction of mooring facilities at km 607.5 of The Oder river, at the plot No. 183, precinct 0001 Górzycyca, in Górzycyca commune, upstream of Ługi Górzycyckie village. The mooring facility will be located parallel to the river axis, approx. 5 m from the waterway boundary. The total length of the mooring line is approx. 90 m. The spacing of the dolphins is 10 to 30 m. The project includes the construction of a jetty to connect the mooring line with the bank. As the project site is located outside the waterway, it will be necessary to dredge the riverbed on that section, so to ensure the transit depth of 1.8 m along the mooring line.

The project site, that is the plot No. 183 precinct 0001 Górzycyca, is partly covered by a local spatial management plan adopted by Resolution of the Council of Górzycyca Commune No. XVI.85.2012 of 2 March 2012 on adopting the local spatial management plan for Górzycyca commune near Górzycyca town (consolidated text: Official Journal of Lubuskie Province of 9 October 2014, item 1828). The site has been marked in the local spatial management plan as 1 WS – areas covering inland flowing surface water, an inland waterway including related infrastructure, water management equipment for proper maintenance of river channels, and flood protection measures, within the meaning of the Water Law.

Considering all the conditions arising where a project is qualified for an environmental impact assessment, laid down in Article 63 of the EIA Act, and having analysed the application for issuing the environmental permit for the planned project and the project information sheet, it has been established that the project is not located on a wetland or another area with a high groundwater table, including riparian sites or river mouths, coastal areas and in marine environment, mountain or forest areas, protected areas, including protection zones of water intakes and inland water protection areas, areas where environment quality standards have been or are likely to be exceeded, areas with a landscape of historic, cultural or archaeological importance, areas adjacent to lakes, health resorts and health-resort protection areas.

The project area is not an environmentally sensitive location, that is a wetland, area with a high permanent groundwater table, hatching area, river mouth or lakeside area, and the technology of works ensures the protection of water against contamination. The works will not include tree clearing, and the mooring area will not be illuminated. Direct and indirect impact on zoocoenoses and phytocoenoses in the project area and the perithecium will mainly exist during construction, changing for a short time the existing ecosystem conditions and creating new living conditions. The change will be local, mostly reversible and with no significant impact on the neighbourhood.

The documentation presents environmental protection measures, including those which are to minimise the project impact on the nature, which include, without limitation, the following

measures:

- the works interfering in the Oder river channel will be carried out beyond the spawning and spawn incubation season, which lasts from 1 March to 30 June. The works that interfere in the river channel will be carried out only within the planned icebreaker mooring locations;
- the works conducted to disturb the shore will be carried out between September and April, so during the lowest activity of reptiles and amphibians;
- if any works are performed from the beginning of May till the middle of August (which is the animal reproduction season), the noise generated by mechanical equipment will be minimised by carrying out the works during the day only;

The planned project is situated in the Natura 2000 area 'The Warta River Mouth' (PLC080001), which has no protective action plan or protection plan.

The most important (that is high or moderate) adverse impacts (threats and pressures) on the area, that is on protected natural habitats and species, identified in the relevant SDF, may arise due to a failure to mow or pasture, hunting, preying, changes in cultivation, angling, catching, poisoning or poaching. The low-level adverse impacts which may arise from the project objective, relate to the waterways. Therefore, the planned project does not belong to any of the above-mentioned categories of threats. The Oder is a navigable river, and the new infrastructure and dredging of the channel bed will be used to improve the efficacy of rescue operations (ice breaking), and cause no change in the water conditions in the channel or valley of the river. Despite previous transformations of the Oder river (construction of groins), maintenance works and water transport, the value of the natural habitats existing at the river was high, and the aforesaid Natura 2000 area 'The Warta River Mouth' was established.

Near the work site, there were found specimens of the black kite, which is protected in that Natura 2000 area, but which did not nest in the observation areas, that is at the project site and within its buffer zone of 300 m. The start and execution of the project do not require intentional scarring of animals. During the project, the impact will involve the presence of people and machinery and the execution of works. This unintentional impact will be short, limited to the construction period, locally restricted, and will depend on a random, unpredictable and unlikely presence of protected species near the project. We may assume that this, even if accumulated with the field works or water traffic, will not be anything new for the animals, which would scare them off at a scale causing a threat to protected species at the project site and in the whole Natura 2000 area.

The construction and operation of the mooring facilities (dolphins, piled steel jetty and stairs)

will not cause a permanent change in the management and use of the space, which implies preservation of the condition of development existing when the Natura 2000 area was established. The project also does not introduce any impact important to the protected natural habitats or other animal species, in particular fish. In the main channel of the Oder river, these species are common (asp, spined loach, white-finned gudgeon) or are not present whatsoever (weatherfish). During the assembly of dolphins, the interference in river bed structure will only be local, to cover a 90 m section, outside the inter-groin areas and near the main current, and will not affect the flow conditions or the quality of water in the Oder river.

The presented scope of using the environment and the scope of impacts do not require, directly for the execution of the project and the operation of the facility (for the habitats of animals, including birds, and for protected natural habitats), reducing the area of the habitats or deteriorating their structures, or removing or reducing the area of such habitats.

The project does not require and will not cause a change in the population of local animals or any of the protected species, especially the population existing in the entire Natura 2000 area. There will be no change in their living space, which could eliminate the areas for shelters, preying, mating or reproduction.

The project to be carried out in the Natura 2000 area:

- will not affect any crucial processes or relations shaping the local structure;
- will not alter the matched pairs or groups of species or the fragmentation of natural habitats;
- will not disturb any ecosystem relations;
- will not intensify any threat to the maintenance of adequate conservation status of natural habitats or species and their habitats;
- will not cause any migration barrier.

To summarise, it has been found that the impact caused by the project location and scale will be local and irrelevant in terms of the objective of protection of Natura 2000 areas. In consequence, there are no grounds to conclude that during operation the facility will have a significant impact on the nature protected by the Natura 2000 area.

The project site is situated in the area of a planned ecological corridor called 'The Oder river Valley South' (source: <http://geoserwis.gdos.gov.pl>). However, considering the above-specified location of works and the impacts of the project during execution and operation stages, we may conclude that the construction of the icebreaker mooring site will not reduce the local and supra-local migration potential in the said corridor, and will certainly not create a migration barrier for animals.

The decision to waive the environmental impact assessment was also preceded by a reference

to aggregated environmental protection circumstances specified in Article 63(1) of the EIA Act, that is the type, characteristics and location of the project, including a possible threat to environmental protection, and the type and scale of possible impact with reference to the natural conditions of the closest large-scale forms of environmental protection.

Referring the project to the possible activities aggregated with the modernisation and construction of roads and river walls, which will be built upstream of the project site, at a section of the free-flowing Oder river, we may anticipate that these structures will not generate any substances or energy that would induce a modification of environmental processes or the exchange of energy and matter at the extremes of the Oder and its valley. They will be point (at most local) impacts, and the related works will be coordinated.

The results of environmental survey, illustrated and described in the PIS, indicate that the area of works or its immediate surroundings include no sites of protected species of flora, amphibians or insects. Close (up to 250 m) to the work site, there were found specimens of nesting or probably nesting birds, that is grasshopper warbler, great reed warbler, hooded crow, and rodents: Eurasian harvest mouse and common shrew. Environmental nuisance caused by the construction will be short in time and gradually disappearing, and the environmental transformation scale will be local. The nearby surroundings of the project are home to diverse and adequate habitats for the animals presently living at the project site, which may be temporary or target habitats during the works, and at the operation stage the animals will certainly return to their previous sites.

Considering the results and conclusions of the project impact on the objects protected in the Natura 2000 area, the aforementioned nature of impact, the insignificant natural assets of the affected area, the universality of local animals, and the above-mentioned solutions to protect the environment, presented by the investor, at the present stage we have found no representatives of protected species or protected habitats, to which the project could pose a threat, and which would make it necessary to assess such a threat and to formulate non-standard requirements not provided for by environmental regulations. Further, there is no need to formulate requirements for the conservation of species of animals, plants or fungi, which would go beyond the relevant legal solutions. We have found no sensitive sanctuaries or sites of other wild animals which would be functionally related to the objects protected in the Natura 2000 area, and which would require any special requirements, not stated in environmental regulations, that would need to be formulated in the environmental impact assessment. The project site is not a local (and all the more regional) sanctuary of fauna or a unique place of its existence, beyond which individual specimens or groups of specimens could not live, and whose transformation or functional alteration (which is not

planned) would adversely affect the protection and condition of nature in the area.

The construction of the icebreaker mooring facility will cause impacts of such a scale that will not disturb the environmental balance, which do not require an environmental impact assessment or taking untypical preventive or mitigating actions. The project scale also does not require compensation measures.

We have found no circumstances that would require the assessment, or any uncertainty as to the scope of impact on nature protection. The environmental protection solutions will meet the nature protection criteria, both at the project site and within its reach.

According to the water management plan in the Oder catchment area, the project site is located in the area of groundwater body (JCWPd) GW600040 and in the area of surface water body (JCWP) called 'The Oder River from the Nysa Łużycka to the Warta', code RW60002117999.

The scope of impact of the planned project will be diverse, and will be mostly temporary, depending on the construction works. Given the project nature, the most serious environmental impact will occur during execution. The impact will be mostly related to the emission of noise and air pollution generated by the machinery and equipment required to prepare the site and settle the dolphins. However, due to a relatively short duration of works, this impact will not be relevant to the environment.

The operation stage will not entail any significant impacts. Once the project is completed, the ice-breaking operations will generate pollution due to fuel combustion in the icebreaker engines, and emit noise due to the operation of those engines and the breaking of ice.

The facility will not change the local climate, neither during construction nor during operation.

The planned project is not classified as a plant posing a risk of major industrial accident within the meaning of Article 248 of the Environmental Protection Law of 27 April 2001 (consolidated text: Polish Journal of Laws 2018, item 799, as amended), nor is it entered into the list of facilities referred to in Article 135(1) of the said Law, for which limited use areas may be established. There are also no grounds to indicate a risk of a major natural or construction disaster. Although the planned project will be carried out in an immediate vicinity of a border between the Republic of Poland and the Federal Republic of Germany, given its scope and scale, there is no risk of a cross-border impact on the environment.

Given the character of the project, its environmental impacts will not accumulate with those caused by other projects.

Having analysed the documents submitted by the Investor and the opinions of the authorities

referred to in Article 64(1)(1), (2) and (4) of the EIA Act, having thoroughly examined not only the direct but also the indirect consequences of the activities to be carried out as part of the project, having carefully analysed the conditions for the project defined in the submitted application, and having considered the requirements stipulated in Article 63(1) of the EIA Act, particularly the location, scale and nature of the project, the authority has concluded that the project will not have any significant adverse impact on the environment. The decision of the Head of Górzycza Commune, stating that the project does not require an environmental impact assessment, was issued on

Given the foregoing, in the Decision of 22 March 2019, ref.: GWOŚ.6220.12.8.2018, the Head of Górzycza Commune has stated that the project does not require an environmental impact assessment.

The information about the decision was published in the Public Information Bulletin of Górzycza Commune and in the publicly available list of data about documents containing information on the environment and its protection, which is maintained by Górzycza Commune on Ekoportal website (www.ekoportal.gov.pl).

Pursuant to Article 84 of the EIA Act, where no environmental impact assessment was conducted, the competent authority shall state in the environmental permit that the project does not require the environmental impact assessment. The project specification is set out as an appendix to this environmental permit.

Pursuant to Article 85(1) of the EIA Act, the environmental permit does not have to be justified.

In accordance with Article 10(1) and Article 73(1) of the Code of Administrative Proceedings of 14 June 1960 (Polish Journal of Laws 2018, item 2096, as amended), by the notice of 22 March 2018, ref.: GWOŚ.6220.12.8.2018, the parties to the proceedings were notified that they may take a stance on the evidence and materials gathered in the case, within 7 days from the date of receiving the notice. The parties have not used the declaration provided for in Article 10 of the Code of Administrative Proceedings.

No remarks or motions concerning the project were received during the proceedings.

With the above in mind and based on the provisions cited at the beginning, I rule as stated.

INSTRUCTION

The environmental permit is attached to the application for the decision referred to in Article 72 and in the notification referred to in paragraph 1a of the Act of 3 October 2008 on publishing information about the environment and its conservation, public participation in environmental protection and on environmental impact assessments, but according to Article 72(3) of the cited Act, the application should be submitted no later than 6 years from the date when the decision became final and binding. The said time limit may be extended by 4 years, if the project which may materially affect the environment is carried out in stages, and the requirements specified in the environmental permit have remained unchanged. The provisions governing the issue of environmental permit shall apply accordingly to amendments thereof (Article 87).

This permit neither confers any title to the land nor infringes the ownership or entitlements of third parties.

The parties may appeal against the permit to the Self-government Appeals Court in Gorzów Wlkp. through the Head of Górzycza Commune, within 14 days of the date the permit was received. During the time for submitting the appeal, a Party may waive the right to appeal against the public administration authority which issued the permit. The permit shall become final and binding on the date the public administration authority receives the statement of waiver of the right to appeal from the last of the Parties to the proceedings.

HEAD OF GÓRZYCA

Appendices:

1. Project specification

Recipients:

- Addresssee
2. Other parties to the proceedings
3. To files

In accordance with Part I, point 45 of the Schedule to the Stamp Duty Act of 16 November 2006 (Polish Journal of Laws 2018, item 1044, as amended), a stamp duty of PLN 205 has been collected for issuing the permit.

Appendix to the Permit issued by the Head of Górzycza Commune, No. GWOŚ.6220.12.10.2018, dated 5 April 2019

Specification of the project titled:

'The construction of docking-mooring infrastructure on Lower Odra River and on boundary sections of Odra River as well as new aids to navigation at km 607.5 of The Oder river carried out as part of the Odra-Vistula Flood Management Project'

1. Type, scale and location of the project

The task No. 1B.3/2, titled 'The construction of docking-mooring infrastructure on Lower Odra River and on boundary sections of Odra River as well as new aids to navigation', covers the construction of icebreaker mooring facilities (having the form of dolphins located beyond the waterway boundary) in 8 independent locations at the section of the Oder river from the Nysa Łużycka to Szczecin, and the installation of new waterway signs. The task is carried out as part of the Odra-Vistula Flood Management Project (POPDOW), and aims at allowing safe and effective ice-breaking.

The mooring places to be built within Task 1B.3/2 are as follows:

1. Szczecin – km 34.8 of The West Oder River
2. Zatoń Dolna – km 688.2 of The Oder river
3. Osinów Dolny – km 663.2 of The Oder river
4. Kaleńsko – km 623.6 of The Oder river
5. **Ługi Górzycie – km 607.5 of The Oder river**
6. Pławidło – km 595.3 of The Oder river
7. Kunice – km 572.0 of The Oder river
8. Biała Góra – km 548.4 of The Oder river

The mooring facility will be located parallel to the river axis, approx. 5 m from the waterway boundary. The total length of the mooring line is approx. 90 m. The spacing of dolphins is 10 to 30 m. The project includes the construction of a jetty to connect the mooring line with the bank.

As the project site is located outside the waterway, it will be necessary to dredge the river bed on that section, so to ensure the transit depth of 1.8 m along the mooring line. The project is likely to involve related dredging works (if deemed necessary) to ensure a depth adequate for icebreakers. The works should be performed based on the average water depth necessary to maintain transport parameters of 1.8 m, or on the river channel elevation. The dredging residues will be examined and then, based on laboratory test results, managed according to applicable regulations. Specific information on the quantity of necessary dredging works can be estimated while preparing the design documentation.

The works will be carried out on the waterside. No site back-up facilities are planned for the project.

The planned mooring places will be marked upstream and downstream of the facility with appropriate signs used at inland waterways. Specific locations of the signs will be adjusted to the signs already existing.

The project location meets the requirements for the distance to the existing infrastructure, so the planned mooring facility will be additionally signed as a place admitted for mooring vessels that carry dangerous goods as defined in the ADN.

The consolidated text of the *European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN)* was published on 8 September 2017 in the Polish Journal of Laws, under item 1719.

The publication of the ADN in the Polish Journal of Laws fulfils the obligation to transpose Commission Directive (EU) 2016/2309 adapting for the fourth time the Annexes to Directive 2008/68/EC of the European Parliament and of the Council on the inland transport of

dangerous goods to scientific and technical progress.

The regulations specify the types of dangerous goods and substances, which may or may not be carried by inland water vessels, and the method they must be packed, loaded or unloaded. The unification of the provisions will have a favourable influence on the safety of inland waterway transport.

The provisions of the ADN are amended in Europe every two years.

The Investor has identified the project location as optimal for the mooring of icebreakers during ice-breaking operations. The facility may only be used for stopover purposes.

The location has no direct access by road. The nearest circulation path is approx. 1.0 km away. Emergency circulation may be provided by the embankment road located on the embankment's landside.

Table 1: Project location on particular plots

No.	Name	District	Commune	Precinct	Plot	Owner / Possessor	Notes
1	2	4	5	6	7	8	9
05	Ługi Górzycyckie	Słubicki	Górzycza	0001 Górzycza	183	State Treasury PGW WP RZGW in Szczecin	

Source: Technical Concept Plan, October 2018

The grounds under flowing surface water (plot 183, precinct 0001 Górzycza) are owned by the State Treasury (permanent operator: State Water Holding Polish Waters (PGW WP), Regional Water Management Board (RZGW) in Szczecin).

The planned dolphins will be located entirely in water, between the heads of two groins at the right shore of the Oder, approx. 50 m from the shore.

The planned project is not situated on wetlands as defined by the Ramsar Convention. The project is located on the right bank of the Oder river (watercourse). It is not located at the mouth of the river. The planned project is situated approx. 150 km from the coast of Baltic Sea. The location is not a mountain or forest area, nor an area with exceeded environmental standards. The area of the planned mooring infrastructure does not cover any terrains with a landscape of historic, cultural or archaeological importance. Near the project location, there are no monuments that would be entered into the register of monuments (source: <https://mapy.zabytek.gov.pl/nid/j>).

2. The area of the real property and civil structure, their current use and coverage with vegetation

The mooring facility will be located approx. 2.6 km from Ługi Górzycyckie village (situated northeast from the facility) and approx. 3.9 km from Górzycza town (situated southeast from the facility). The town of Kostrzyn nad Odrą is situated approx. 7.3 km north from the planned facility. The anthropogenic components of the local landscape include numerous groins in the river channel as well as a levee.

The reinforced riverbanks are locally covered by rush prevailed by phragmites, with a common presence of reed canary grass. The bank areas not covered by rush plants are often occupied by the dewberry (*Rubus caesius*). Behind the rush and bushes, at the bottom of the levee, there are grass communities including false oat-grass (*Arrhenatherum elatius*), cock's-foot (*Dactylis glomerata*), Kentucky bluegrass (*Poa pratensis* and *P. trivialis*), perennial ryegrass (*Lolium perenne*), tansy (*Tanacetum vulgare*) and creeping thistle (*Cirsium arvense*). At that section, the

riverbank is artificially reinforced by a stone embankment, which largely hinders the formation of valuable natural habitats growing in riverside areas.

3. Type of technology

Requirements for vessels

- Icebreakers
 - o Width: max. 8.1 m;
 - o Length: max. 36 m;
 - o Draught: ~1.7 m;
 - o Side height: ~2.4 m;
 - o Displacement: 335 t.
- Vessels admitted for emergency mooring
 - o Pushed convoy:
 - Width: max. 11.4 m;
 - Length: max. 150 m;
 - Draught: ~ 1.7 m;
 - Side height: ~2.4 m;
 - Block coefficient: 0.9;
 - Displacement: max. 1711 t.
 - o Motor barge:
 - Width: max. 11.4 m;
 - Length: max. 86 m;
 - Draught: ~ 1.7 m;
 - Side height: ~2.0 m;
 - Block coefficient: 0.9;
 - Displacement: max. 1063 t.

Table 2: Designed parameters of mooring lines

No.	Name	km of the Oder river	Length of mooring line	Max. spacing of dolphins	Min. spacing of dolphins	Length of operating footbridge
			m	m	m	m
1	2	3	4	5	6	7
05	Ługi Górzycykie	607.5	90	30	10	52.5

Source: *Technical Concept Plan, October 2018*

Dolphins

The plan assumes three-pile dolphins with two braces. The diameter and class of the piles will be chosen at the stage of building permit design, based on the calculations of elastic effects exerted by the mooring vessels, according to applicable regulations and guidelines. The dolphins will be provided with fixed or free fender beams made of elastomer or polyurethane.

Between the bank or groin and the dolphins, there will be a jetty made of ‘Wema’ steel grids, erected on a steel supporting structure made of sections. The footbridge will be supported by separate piles. Along the entire footbridge, there will be steel railings, min. 1.1 m high. The exit

to the bank will be made of concrete steps or a steel structure.

The dolphins will be designed taking into account the pressure by ice cover, but the mooring line is additionally provided with ice aprons, made as additional dolphins with a structure for crushing the ice cover. A similar solution is provided on the upstream side, before the piles of the operating footbridge.

Staking of piles

The fixed points and main piling axes will be staked by a team of land surveyors holding relevant licences, at the Contractor's request. The location, coordinates and vertical position of each pipe will be checked before and while the pile is vibrated.

Vibrating of open-steel-pipe piles

The piles will be made of prefabricated pipes adjusted to the designed length. Ready-made prefabricated pipes will be inserted into vibrating hammer jaws with a lift.

Once the jaws clamp, the pipe will be positioned centrally in the location of the pile. When an open-bottom steel pipe is vibrated into the ground, a 'ground plug' forms inside it, which gradually closes the pipe. Then the remaining space inside the pipe is filled with sand.

Erection works

The pile tops will be made by a team of welders working on a ferry anchored to the piles previously vibrated into ground. With an electric welding machine powered by the generators placed on a vessel, they will install the dolphin bonds made of steel sections, and a top part at the head of each dolphin, made of flat sheets.

The materials to be used to make the bonds and cap the heads will be prepared based on templates, on land, and delivered to the place of installation using floating equipment.

The vessels to be used for the works have their own sanitary facilities, and any waste they will generate is collected by specialised companies.

Production technology

The new dolphins will be made with prefabricated steel components to be delivered to the transshipment yard. The components to be transshipped with a lift will be loaded onto upper-deck barges and transported by water to the place of installation.

Other works

Once the construction works are completed, the Contractor should check the riverbed in the area of the new dolphins to verify if there are no anthropogenic or natural elements which may hinder navigation. As part of the works, the Contractor should remove any tree branches, steel or fibre ropes and other elements laying on the riverbed.

4. *Anticipated quantity of necessary water, materials, raw materials, fuels and energy*

Construction stage

During execution, the project will require fuels for transport equipment, vessels, machines and construction equipment. An electric welding machine will be used, which is to be powered by a generator installed on a vessel, so energy will not have to be supplied from any other source. It will be necessary to obtain raw materials for the dolphins (such as concrete or sand), in the quantities specified in the following table.

The vessels will have their own sanitary facilities.

Table 1: Anticipated quantity of water, materials, raw materials, fuels and energy necessary at the execution stage

No.	Consumption of materials and raw materials	Estimated quantity [Mg]
1	Water [m ³]	100
2	Fuels [m ³]	100
3	Stone [Mg]	7.5
4	Sand [m ³]	50
5	Concrete [m ³]	2
6	Steel [Mg]	385

Operation stage

At the operation stage, the project (i.e. the new mooring facility) will not require the use of any materials, raw materials, water, fuels or electricity, except the time of overhaul and maintenance works.

5. *Environmental protection measures*

5.1 Environmental protection measures at the execution stage

At the execution stage, the following organisational and environmental protection measures will be used:

- the selection of machines with a low emission of pollution and noise, which meet valid legal requirements concerning noise emission by equipment used outdoors;
- the use of only such equipment and vessels that are in good condition, and timely and adequate maintenance of construction machinery, which will prevent the leaks of fuels, oils or other operating fluids, and thus their penetration into soil or groundwater;
- new construction members and equipment will be transported mainly by water or on paved roads; in case of a leaking hazardous substance coming from the means of transport, sorbents will be used to eliminate the hazard;
- the machines and vehicles will not be overloaded, and as far as possible the engines will

- not operate at top speed;
- avoiding transports without load, limiting the time of idle operation of combustion engines, limiting the operating time of the equipment causing the highest noise levels;
- ensuring a proper organisation of civil and erection works – the civil and erection works will be performed during the day;
- the works contractor will store waste generated by the civil and erection works in a way to protect the environment against contamination. All types of waste generated will be collected and stored in a selective manner, which will facilitate their management by authorised entities. Proper arrangement of day-to-day waste management, proper organisation of site back-up facilities, and compliance with occupational safety rules will help eliminate a direct impact of waste on human life and health and on the environment;
- the works interfering in the Oder river channel will be carried out beyond the spawning and spawn incubation season, which lasts from 1 March to 30 June; The works that interfere in the river channel will be carried out only within the planned icebreaker mooring locations;
- the works conducted to disturb the shore will be carried out between September and April, so during the lowest activity of reptiles and amphibians;
- if any works are performed from the beginning of May till the middle of August (which is the animal reproduction season), the noise generated by mechanical equipment will be minimised by carrying out the works during the day only;
- the dolphins will not be illuminated;
- the trees or bushes existing in the project area will not be cleared;
- the contractor will only use such construction materials and raw materials (gravel, sand, prefabricated building materials and others) which will not deteriorate the environmental condition compared to the present status. The construction materials to be used must have technical approvals and certificates admitting them for use in construction.

The aforesaid measures will fully eliminate threats to the natural environment during construction, will not breach the applicable environmental protection norms, and will cause no significant adverse effects on the environment.

5.2 Environmental protection measures at the operation stage

The dolphins will be made of environmentally neutral materials, and their maintenance will not generate the emission of pollutants or energy to the environment. The new mooring places will help improve the safety of ice-breaking operations, and thus will reduce, for example, the risk of leakage of oil derivatives to surface water.

6. Types and anticipated quantity of substances or energy emitted to the environment with the use of environmental protection measures

6.1 Anticipated emissions at the execution stage

6.1.1 Air pollutant emission

During execution, air pollution will mainly be emitted by the vessels, machines and equipment used for construction works. The operation of floating equipment and construction machines will generate pollutants coming from fuel combustion by engines (such as nitrogen oxides, sulphur dioxide, carbon monoxide or aliphatic hydrocarbons).

The pollutants will be emitted at a low height so, given their minor spread, the emission generated

by transports and auxiliary works will be local and restricted in space, to exist only in the place of generation (construction site), and will have no significant impact on air quality. Furthermore, the works will be quite short.

Consequently, the impact on the ambient air during execution will not cause any significant modifications in the existing contamination at the project site, will not impact the climate in the area of the border Oder river, and will not pose a hazard to the life or health of local residents.

Exhaust emission will be minimised by using fully operational equipment and limiting its operation time to a required minimum.

6.1.2 Noise emission

The execution stage will imply a short noise emission during temporary use of the machinery and equipment required to prepare the site and settle the dolphins. The emitted noise will be intermittent, and its intensity will vary at different stages of works, depending on their course and the use of specific machines and equipment.

The noise emission during the works may influence the animals living nearby. They might be scared off, but given the temporary character of the noise emission, the animals will return to their previous habitats.

Given that the emission will be short and local, during execution the project will not exert a significant impact on the acoustic environment in the project location. It is all the more so, as the project site is not surrounded by any areas subject to noise abatement. Nevertheless, the noise will be minimised by using fully operational equipment which meets relevant legal provisions setting out the allowable level of noise. Limiting the operating time of equipment will additionally reduce the nuisance to the local environment, caused by the works. The works will be carried out during the day.

6.1.3 Wastewater emission

During execution, domestic wastewater will be produced. The vessels working on the waterside will be supplied with their own sanitary facilities, and the wastewater collected in special tanks will be delivered to a wastewater treatment plant. The vessels to be used for the works have their own sanitary facilities, and any waste they will generate is collected by specialised companies.

6.2 Emissions anticipated at operation stage

6.2.1 Air pollutant emission

After the project is completed, the operation of the mooring facilities on the border Oder river will not entail any emission of air pollutants.

However, it should be noted that, both presently and after completing the project, the ice-breaking operations will cause the emission of pollutants due to fuel combustion in the icebreaker engines. Besides, since the Oder river serves as a waterway, pollution is and will be released to the air by the engines of circulating vessels.

6.2.2 Noise emission

After the project is completed, the operation of the mooring facilities on the border Oder river will

not entail any noise emission.

However, it should be noted that, both presently and after completing the project, noise will be emitted by the icebreaker engines and during ice-breaking operations. Besides, since the Oder river serves as a waterway, noise is and will be emitted by the engines of circulating vessels.

6.2.3 Water and wastewater management

After the project is completed, the operation of the mooring facilities on the border Oder river will not entail any wastewater generation.

However, it should be noted that, both presently and after completing the project, the ice-breaking operations will generate wastewater to be produced on the icebreaker decks. However, the icebreakers are provided with their own sanitary facilities, and wastewater is collected in special tanks which are drained at the icebreaker base and then carried to a wastewater treatment plant.

Besides, since the Oder river serves as a waterway, wastewater is produced on the circulating vessels. Similarly to the icebreakers, it is collected in special tanks which are drained at ports/marinas and then carried to a wastewater treatment plant.

7. *Cross-border environmental impact*

Although the planned project will be carried out in an immediate vicinity of the border between the Republic of Poland and the Federal Republic of Germany, considering its nature, location and scale, the impact it will generate will not influence the areas situated outside Poland.

Any possible nuisance caused at the execution stage may only relate to short-term noise emissions during the works and the scaring of birds and their ichtiofauna; the operation stage will not imply any environmental impact.

8. *Environmental protection measures*

8.1 *Environmental protection measures at the execution stage*

At the execution stage, the following organisational and environmental protection measures will be used:

- the selection of machines with a low emission of pollution and noise, which meet valid legal requirements concerning noise emission by equipment used outdoors;
- the use of only such equipment and vessels that are in good condition, and timely and adequate maintenance of construction machinery, which will prevent the leaks of fuels, oils or other operating fluids, and thus their penetration into soil or groundwater;
- new construction members and equipment will be transported mainly by water or on paved roads; in case of a leaking hazardous substance coming from the means of transport, sorbents will be used to eliminate the hazard;
- the machines and vehicles will not be overloaded, and as far as possible the engines will not operate at top speed;
- avoiding transports without load, limiting the time of idle operation of combustion engines, limiting the operating time of the equipment causing the highest noise levels;
- ensuring a proper organisation of civil and erection works – the civil and erection works will be performed during the day;
- the works contractor will store waste generated by the civil and erection works in a way to protect the environment against contamination. All types of waste generated will be collected and stored in a selective manner, which will facilitate their management by authorised entities. Proper arrangement of day-to-day waste management, proper organisation of site back-up facilities, and compliance with occupational safety rules will help eliminate a direct impact of waste on human life and health and on the environment;
- the works interfering in the Oder river channel will be carried out beyond the spawning and spawn incubation season, which lasts from 1 March to 30 June; The works that interfere in the river channel will be carried out only within the planned icebreaker mooring locations;

- the works conducted to disturb the shore will be carried out between September and April, so during the lowest activity of reptiles and amphibians;
- if any works are performed from the beginning of May till the middle of August (which is the animal reproduction season), the noise generated by mechanical equipment will be minimised by carrying out the works during the day only;
- the dolphins will not be illuminated;
the trees or bushes existing in the project area will not be cleared;
- the contractor will only use such construction materials and raw materials (gravel, sand, prefabricated building materials and others) which will not deteriorate the environmental condition compared to the present status. The construction materials to be used must have technical approvals and certificates admitting them for use in construction.

The aforesaid measures will fully eliminate threats to the natural environment during construction, will not breach the applicable environmental protection norms, and will cause no significant adverse effects on the environment.

8.2 Environmental protection measures at the operation stage

The dolphins will be made of environmentally neutral materials, and their maintenance will not generate the emission of pollutants or energy to the environment. The new mooring places will help improve the safety of ice-breaking operations, and thus will reduce, for example, the risk of leakage of oil derivatives to surface water.

9. Areas protected under the Nature Conservation Act of 16 April 2004, and wildlife corridors covered by a significant impact of the project

The project is located in the Natura 2000 area 'The Warta River Mouth' (PLC080001), which is also a bird special protection area and a special area of habitat conservation. The project site is situated approx. 50 to 80 m from the boundaries of the following protected areas:

- the buffer strip of 'The Warta River Mouth' National Park,
- 'The Warta Mouth' Landscape Park,
- 'The Oder river Valley South' wildlife corridor.

The project is located around 470 m from 'Ziemia Lubuska North' wildlife corridor, and around 515 m from the boundaries of 'PRZY ROWIE' ecological site.

Considering the character and scope of the project, it will have no adverse impact on the forms of environmental protection existing near the project site.

HEAD OF GÓRZYCA
