

Chojna, 10 May 2019

BPI.6220.4.2018.MK

ENVIRONMENTAL DECISION [decision on environmental conditions]

Pursuant to Article 71(2)(2), Article 75(1)(4), Article 84 and Article 85(1) and (2)(2) 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 pursuant to § 3(2)(2) in conjunction with § 3(1)(62) of the 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, as amended), and pursuant to Article 104 of the Code of Administrative Proceedings of 14 June 1960 (Polish Journal of Laws 2018, item 2096, as amended), having examined the application dated 30 November 2018 (received on 5 December 2018), filed by the investor, State Water Holding Polish Waters – Regional Water Management Board in Szczecin, ul. Tama Pomorzańska 13A, 70-030 Szczecin, represented by the attorney, Ms Krystyna Araszkiwicz, for issuing an 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 688.0 of The Oder river, carried out as part of the Odra-Vistula Flood Management Project’,

I hereby decide

I. 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 688.0 of the Oder river, carried out as part of the Odra-Vistula Flood Management Project’ does not require an environmental impact assessment;

II. To determine the following conditions and requirements for the planned project:

- a) the works that interfere in the river channel should be carried out only within the planned icebreaker mooring locations;
- b) the method of managing dredge spoil should be determined in line with separate laws governing waste management, upon obtaining the laboratory test results for such spoil;
- c) 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;
- d) 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;
- e) during execution, it is not allowed to destroy any plants growing outside the project site;
- f) it is not allowed to clear any trees growing near the declared natural habitat;
- g) the area of forest natural habitat must be protected, for example by temporary fencing;

- h)** the works should be carried out in a way to minimise any emission of contamination to groundwater environment, and in case of leak of hazardous substances coming from transport equipment, the hazard should be eliminated with sorbents;
- i)** the works interfering in the Oder river channel should be carried out beyond the spawning and spawn incubation season, that is beyond the period from 1 March to 30 June;
- j)** the works implying interference in the bank and the construction of the footbridge should be carried out between September and April, under environmental supervision;
- k)** to protect birds, the works should be carried out beyond the bird breeding season, that is beyond the period from 1 March to 31 August;
- l)** the works should be performed during daytime, but if the construction site or the new facilities are illuminated, the illuminated area should be minimised, and the light beams should not fall directly on trees;
- m)** the works should be performed under environmental supervision to monitor on an ongoing basis the locations and method of works and their compliance with the requirements set out herein. The environmental supervision should cover, without limitation:
 - monitoring for compliance with the requirements set forth herein and with the legal regulations governing the nature protection; - day-to-day monitoring of the construction site and the area of works for the local presence of any protected species;
 - the determination of any periods of works to avoid an adverse impact on protected species; checking (where required) whether the investor has obtained relevant permits, as required by Articles 51, 52 and 56 of the Nature Conservation Act 16 April 2004 (Polish Journal of Laws 2018, item 1614, as amended); notifying appropriate authorities/institutions (including law enforcement authorities) in the event the contractor/investor violates the nature protection regulations.

Justification

On 3 December 2018, the investor, State Water Holding Polish Waters – Regional Water Management Board in Szczecin, ul. Tama Pomorzańska 13A, 70-030 Szczecin, represented by the attorney, Ms Krystyna Araszkiwicz, applied to the Mayor of Chojna for issuing an 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 688.0 of The Oder river, carried out as part of the Odra-Vistula Flood Management Project’. In accordance with § 3(2)(2), in conjunction with § 3(1)(62) 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) – *ports or inland waterways, other than those listed in § 2(1)(33)*, the project is classified as a projects which may materially affect the environment, for which an environmental impact assessment may be required under Article 63(2) of the EIA Act, and, consequently, it constitutes the planned project referred to in Article 59(1)(2) of the EIA Act.

The Regional Director for Environmental Protection in Szczecin, by his letter of 20 February 2019, ref.: WONS-OŚ.4220.19.2019.KS, has stated that this project does not require an environmental impact assessment.

The State District Sanitary Inspector in Gryfino, by his letter dated 14 February 2019, ref.: PS-N-Nz/4011-1/25/19, has stated that he does not request an environmental impact assessment for the project.

The Minister of Maritime Economy and Inland Waterways, by his letter dated 26 March 2019, ref.: DOK.DOK2.9750.8.2.2019.SW, has stated that this project does not require an environmental impact assessment. Pursuant to the 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 construction of mooring facility for icebreakers, in the

specified scope, is a project which may adversely affect the environment. In accordance with the list of projects contained in the said Regulation, the project is mentioned in § 3(2)(2), in conjunction with § 3(1)(62) – ports or inland waterways, other than those listed in § 2(1)(33). Considering that the proceedings have concluded with a waiver from the obligation to conduct an environmental impact assessment, this authority, based on the opinion given by the Regional Director for Environmental Protection in Szczecin, the State District Sanitary Inspector in Gryfino and the Minister of Maritime Economy and Inland Waterways, and pursuant to Article 84 of the said Act, has decided herein that the project does not require an environmental impact assessment.

In accordance with Article 71(2) of the Act 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), the project requires an environmental permit.

By the letter of 1 February 2018, we have notified the parties about initiating the procedure and informed them that they may read the files of the case, in person or through a representative.

The area of the project is not covered by a local spatial management plan.

The project covers a public benefit undertaking. The water equipment used for waterway maintenance and flood protection meets the public benefit criterion referred to in Article 6(1) and (4) of the Real Property Management Act of 21 August 1997 (consolidated text: Polish Journal of Laws 2018, item 2204). The aforesaid mooring facilities will only be used for active anti-ice protection, and are to be built as part of the Odra-Vistula Flood Management Project (POPDOW).

The documents enclosed with the application indicate that the project is aimed to enable safe and efficient ice-breaking on the Oder river by the construction of mooring facilities 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 688.1 of The Oder river, on plot No. 290, precinct 0002 Zatoń Dolna, Chojna commune. The new dolphins will be spaced at 10 to 30 m, and the total length of the mooring area will be approx. 110 m. The mooring facility will have a fixed jetty, approx. 22.5 m long, providing connection with the bank. The designed technical depth at the mooring line should not be less than 1.80 m at the multi-annual average low water level. The project will not include any additional dredging works to deepen the river channel for the purposes of mooring vessels. The works will mostly be conducted from the waterside, but due to the existing developed bank, that is a paved road running along the bank at the project site, it is allowed to carry out certain works and supply materials from the bank. The mooring places will be marked upstream and downstream of the facility with appropriate signs used at inland waterways. Based on the excerpt from the land register, the site of the project is covered by flowing water. The planned dolphins will be installed entirely in water, around 22.5 m from the right bank of the Oder river. The planned project is not situated on wetlands.

The investor has presented the planned environmental protection measures, including those which are to minimise the project impact on the nature, which include, without limitation, the following measures:

- 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 during delivery;
- ensuring a proper organisation of civil and erection works – the civil and erection works will be performed during the day;
- idle operation of engines, limiting the operating time of the equipment that generates the highest noise;
- 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 project will be subject to environmental supervision;
- 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 works should be performed during daytime, but if the construction site or the new facilities are illuminated, the illuminated area should be minimised, and the light beams should not fall directly on trees, so that the light does not scare off bats from their preying areas and hiding places;
- the dolphins will not be illuminated;
- it is required to protect habitat 91F0 – Riparian mixed forests of *Quercus robur*, *Ulmus laevis* and *Ulmus minor*, *Fraxinus excelsior* or *Fraxinus angustifolia*, along the great rivers (*Ulmion minoris*), situated in an immediate vicinity, for example by marking it with a tape, in order to prevent unintentional damage during the works;
- no trees or bushes will 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 previously mentioned 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.

The project location was chosen, as it is close to the existing paved road, which provides a connection with the mooring facility.

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

- PLRW60002119199 The Oder River from the Warta to the West Oder – 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 water-course, good chemical condition. Risk of non-achieving the environmental objectives: risk; a deadline extension was allowed to achieve the environmental objective (no technical feasibility) – the

deadline to achieve a good water condition was set at 2021. 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. The water body is an area of habitat or species protection, where the maintenance or improvement of their condition is an important protection factor.

- PLGW600023 – monitored; 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. This water body is not subject to any derogation under the Water Framework Directive. A part of the water is intended for water intake for the purposes of providing water for human consumption.

The identified impacts implied by the construction works to be executed in the area of the surface water body 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 environmental objectives, as presented in the documentation, was conducted by the Investor with due regard to currently available monitoring information regarding the condition of water (data provided by the Provincial Inspectorate for Environmental Protection, from 2017 for the JCWP and from 2016 for the JCWPd). Neither the construction nor the operation of the facility will cause the inflow of contaminants to the groundwater, so it will not impair the condition of that groundwater body.

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 catchment area for the surface and ground water 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 (e.g. fuel leakage). The project will not change the width or profile of the river channel.

In accordance with Article 16(32)(c) of the Water Law, the JCWP No. PLRW60002119199 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). Given that the works will be limited in space, and their impact on the JCWP as a whole will be short and minor, the presented documentation indicates that the project will not have an adverse effect on the possibility to achieve the environmental objectives for the said areas.

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, in the investor's opinion there is no risk of a cross-border adverse impact on the environment.

The issue of cumulative impacts was considered with a particular regard to Task 1.B.3 of the POPDOW project, that is the 'construction of mooring facilities', and Task IB.2, that is the '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 I.B.2 will be carried out in stages.

According to the information provided by the Investor, 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.

The project will be located within two Natura 2000 areas: the bird special protection area 'The Lower Oder river Valley' (PLB320003) and the site of Community importance 'The Lower Oder river' (PLH320037). In addition, the project will be located near the boundaries of Cedyňa Landscape Park.

As regards the 'The Lower Oder river Valley' (PLB320003), considering the Order of the Regional Director for Environmental Protection in Szczecin dated 30 April 2014 on adopting a protective action plan for the Natura 2000 area 'The Lower Oder river Valley' (PLB320003) (Official Journal of Zachodniopomorskie Province, item 1934), amended by the Order of the Regional Director for Environmental Protection in Szczecin, dated 27 April 2017, and considering the information we possess, the project site includes no positions of the objects protected in that area. The nearest position is approx. 150 m away. The project site directly adjoins a protection zone of the red kite. According to the data contained in the information sheet, specimens of approx. 20 bird species have been identified on the project site and in its 300 m buffer zone. The aquatic environment was represented by two breeding species (mallard, common coot) and three non-breeding species (cormorant, grey heron and common sandpiper), which were feeding on the site. To protect the birds, we have stipulated that the works may not be carried out in the bird breeding season.

As regards the 'The Lower Oder river' (PLH320037), considering the Order of the Regional Director for Environmental Protection in Szczecin dated 31 March 2014 on adopting a protective action plan for the Natura 2000 area 'The Lower Oder river' (PLH320037) (Official Journal of Zachodniopomorskie Province, item 1661), amended by the Order of the Regional Director for Environmental Protection in Szczecin, dated 06 December 2016, and considering the information we possess, the project site includes no natural habitats. Nearby, on a plot of land, there is a habitat coded 9160 – Sub-Atlantic and medio-European oak or oak-hornbeam forests of the Carpinion betuli. According to the project information sheet, the surveyors who examined the area have classified the patch existing along the bank as the habitat coded 91F0 – Riparian mixed forests of *Quercus robur*, *Ulmus laevis* and *Ulmus minor*, *Fraxinus excelsior* or *Fraxinus angustifolia*, along the great rivers (*Ulmion minoris*). The area is a hill, and the authors of the information sheet indicate that the intensity of the broadleaved forest increases with the raising terrain. Therefore, in our opinion it should be regarded as a transitional area. Nevertheless, there will be no interference in the habitat or tree clearing. It was additionally stated that the habitat should be fenced for the duration of works, in order to minimise any unintentional interference.

Near the project site, the surveyors discovered a hiding place of the common noctule (a hollow in a tree). There were no bats inside, but their presence was confirmed based on a discharge from cheek gland, aggregated around the inlet. The proximity of an abundant feeding ground (the surface of the Oder river) makes the hollows (approx. 10) located at the project site good hiding places during migration or breeding season.

The project does not interfere in the forest area, so the habitat will not be destroyed. To minimise the impact on this group of mammals, we have set a requirement regarding the use of lighting at the site during execution.

Additionally, the project site may be used by the Eurasian beaver and the otter. On the shore, hiding places of the hedgehog were discovered.

The Oder river is home to many species of fish. According to the project information sheet, the species protected under the Habitats Directive include the asp, spined loach, white-finned gudgeon, weatherfish and Amur bitterling. Given the character of the project and the scope of related works, the project should not have a significant impact on the population, habitats or spawn of fish. Nevertheless, we have set certain requirements to minimise the impacts.

A survey conducted on the area adjacent to the planned dolphins, in Zatoń Dolna, has revealed the presence of 3 reptile species: viviparous lizard, deaf adder and grass snake. Furthermore, representatives of the green frog complex were discovered. To protect these groups of animals, we have set a condition that the works must be performed in the period when their activity is minimal (between September and April), and under environmental supervision.

In addition, to protect the valuable natural assets existing in the area, all the protected species of flora and fauna, and natural habitats, we have stipulated that the works must be carried out under permanent environmental supervision. The supervising officers must, for example, check on an ongoing basis whether the works are executed in line with the requirements set out herein, and verify the investor's plans against other environmental restrictions imposed by legal regulations.

It should be emphasized that the environmental impact of the project will be limited to the time of construction. Once the works are completed, the Oder river will be used as before. To date, the ice-breaking operations have been conducted when required, in winter.

During construction, the planned project will be a source of waste as well as gases, dusts and noise emitted to the environment; any nuisance generated by the construction works, will only be temporary and will stop when the works are completed. The expected execution period is approx. 3 months.

Waste will be stored on a selective basis and handed over to entities holding relevant licences. 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 works will be carried out during the day.

During execution, domestic waste water 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. During execution, air pollution will mainly be emitted by the vessels, machines and equipment used for construction works. The operation of road vehicles (only for transporting materials – some works may be carried out from the developed riverbank), 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 cars carrying materials to the construction site may also generate dust. This will be a fugitive 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 or noise. No waste or wastewater will be generated.

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, which will also emit noise. These vessels have their own sanitary facilities.

The said impacts already exist in that area, as the Oder river is a waterway that is intensively used for both for leisure and business purposes.

The project site has never been equipped with a mooring line. Consequently, the construction of that facility will add a new function to that area. Aside from installing the dolphins in the river channel, the plan also provides for a fixed jetty to connect the mooring site with the bank. This will bring a change in the landscape – the introduction of new elements (dolphins and a jetty). However, the change will not be significant, and its reach will be local and limited to the area affected by the project. The planned structures will not be tall, and will not form dominant components of the landscape.

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.

The investor must comply with Article 56 of the Nature Conservation Act of 16 April 2004 (Polish Journal of Laws 2018, item 1614, as amended).

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

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.

Having read the application and the project information sheet, and having analysed the direct and indirect effects of the activities involved by the project and the conditions of project execution according to the submitted application, considering the conditions stipulated in Article 63(1) of the EIA Act as well as the scale and nature of the project, **we have concluded that there is no risk that the project will have a significant adverse effect on the environment, and decided that the project does not require an environmental impact assessment.**

With the above in mind, I rule as stated.

INSTRUCTION

1. The environmental permit shall be enclosed with the application for the decision referred to in Article 72(1) and to the notification referred to in Article 72(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 (Polish Journal of Laws No. 2018, item 2081, as amended). The application or notification should be submitted in 6 days from the date when the environmental permit become final and binding.
2. The application or notification referred to in point 1 may be submitted within 10 years of the date the environmental permit became final and binding, the party who submitted the application for environmental permit, or the entity to whom the permit has been assigned, received, from the authority which issued the environmental permit, before expiry of the deadline referred to in point 1, a statement that the project is to be carried out in stages and that the requirements for executing the project, as specified in the environmental permit or in the decision referred to in Article 90(1) of the said Act (if issued), remain in force.

The statement shall take the form of an order, which shall be based on the information about the condition of the environment and about the possibility to implement the requirements set forth in the environmental permit.).

3. The environmental permit shall be binding on the authorities referred to in Article 86 of the cited Act.

4. The parties may appeal against the permit to the Self-government Appeals Court in Szczecin, through the authority which has issued the permit, within 14 days of the date the permit was received.
5. Pursuant to Article 127a of the Code of Administrative Proceedings (Polish Journal of Laws 2018, item 2096, as amended), during the time for submitting the appeal, a party may waive the right to appeal against the public administration authority which issued the permit.
6. 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.

Appendix:

Project specification, in accordance with Article 82(3) 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).

Recipients:

1. Parties to the proceedings
2. Attorney of the State Water Holding Polish Waters
(Regional Water Management Board in Szczecin)
Ms Krystyna Araszkiewicz of Sweco Consulting sp. z o.o.
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3. To files

Copy to:

1. Regional Directorate for Environmental Protection in Szczecin
2. State District Sanitary Inspector in Gryfino
3. Minister of Maritime Economy and Inland Waterways

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