

**INTEGRATED SAFEGUARDS DATA SHEET  
APPRAISAL STAGE**

**Report No.: ISDSA1167**

**Date ISDS Prepared/Updated:** 17-Feb-2015

**Date ISDS Approved/Disclosed:** 18-Feb-2015

**I. BASIC INFORMATION**

**1. Basic Project Data**

<b>Country:</b>	Poland	<b>Project ID:</b>	P147460
<b>Project Name:</b>	ODRA-VISTULA FLOOD MANAGEMENT PROJECT (P147460)		
<b>Task Team Leader(s):</b>	Guy J. Alaerts, Winston Yu		
<b>Estimated Appraisal Date:</b>	09-Feb-2015	<b>Estimated Board Date:</b>	02-Jul-2015
<b>Managing Unit:</b>	GWADR	<b>Lending Instrument:</b>	Investment Project Financing
<b>Sector(s):</b>	General water, sanitation and flood protection sector (100%)		
<b>Theme(s):</b>	Water resource management (100%)		
<b>Is this project processed under OP 8.50 (Emergency Recovery) or OP 8.00 (Rapid Response to Crises and Emergencies)?</b>			No
<b>Financing (In USD Million)</b>			
Total Project Cost:	1641.00	Total Bank Financing:	468.00
Financing Gap:	81.00		
<b>Financing Source</b>			<b>Amount</b>
Borrower			182.00
International Bank for Reconstruction and Development			468.00
Council of Europe Development Bank			390.00
EC European Commission			260.00
EC European Investment Bank			195.00
POLAND Polish ECOFUND			65.00
Total			1560.00
<b>Environmental Category:</b>	B - Partial Assessment		
<b>Is this a Repeater project?</b>	No		

**2. Project Development Objective(s)**

The project development objectives are to increase access to flood protection for people living in

selected areas of the Odra and the Upper Vistula river basins and to strengthen the institutional capacity of the government to mitigate floods more effectively.

### 3. Project Description

The proposed project will build on the lessons learned in the ongoing Odra River Flood Protection Project. The proposed project would help demonstrate new approaches and support alignment with the EU Water Framework Directive (WFD) and Flood Directive--an area where the government is still struggling. To allow an expedient start the proposed project would focus on the “hot spots” in the basins (i.e., the parts that are documented to be most vulnerable) and the “no regret” measures where technical merits are sufficiently clear that no additional studies at basin-scale or approvals are needed and which are listed in Poland’s Updated Master Plans and/or Flood Risk Managements Plans for the River Basins, as well as in the List of investments eligible for EC funding. The national flood strategy and the EU Flood Directive advocate the integration of passive protection of local relevance (mostly, dike construction) with active measures with regional impacts, such as temporary overflow areas and dry polders that create “space for the river” to allow the river expand when in flood pulse. Such combination is usually cost-effective as well as sustainable. Notably, the (re-) creation of such overflow capacity through wetlands can absorb flood waves and at the same time improve environmental values. The Project will, for example, support the rehabilitation of a large wetland upstream of Szczecin on the Lower Odra.

The Project would provide three distinct areas with flood management infrastructure and related measures: (i) the Middle and Lower Odra; (ii) the Nysa-Kłodzko valley, a medium-sized sub-basin of the Upper Odra; and (iii) the Upper Vistula. The Project would further strengthen the national flood forecasting and operational capability in southern and western Poland, through more advanced equipment and mathematical simulation models that would be able to inform decision-makers faster and more reliably about the need to evacuate and take precautionary measures. The Components, with their specific sub-objectives are proposed as follows:

Component 1: Flood Protection of the Middle and Lower Odra (Base cost €446.21 million). This Component aims to enhance protection against summer floods and winter floods to the cities of Szczecin and Ślubice, and to the towns of Gryfino as well as other smaller towns along the river. The activities will include the (re)construction of dikes and other bank protective works (revetments, parapets, etc.), dredging in the Odra river as well as in Canals and harbor of Szczecin, and river training works, i.e., the recalibration and (re)construction of groynes and lateral submerged dams in the river, restoring bends and protect banks. In addition, five bridges need to be raised to facilitate safe passage of the ice-breakers underneath, and navigation and mooring facilities expanded. A key activity concerns the revitalization of the Międzyodrze wetland upstream of Szczecin harbor to help accommodate water surges and, at the same time, restore some of the ecological and touristic functions of the habitat. Four PIUs will be engaged in the implementation of the works, of which one (RZGW Wrocław) has already been involved intensively in the on-going Odra River Flood Protection Project. Selected works (e.g. the Ślubice protective works) have already received the Environment and Construction Permits and their detail designs will be readied to start the tendering procedure in the Fall of 2015.

Component 2: Flood Protection of the Nysa-Kłodzko Valley (Base cost €239.37 million). This Component will protect Kłodzko town and other smaller valley towns, as well as the city of Bardo at the outlet of valley. The Component will comprise the construction of four mid-sized Dry polders (“active protection”), dike rehabilitation and new construction, and reconstruction of the river alignments and embankments, as well as of bridges and other structures (“passive protection”), to

allow the temporary retention and safe passage of flood waves accompanied by large amounts of debris. In addition, the works will have significant downstream benefits because the four new Dry polders will increase the buffer capacity in the valley which will cause reduction of the crest of peak flows in the downstream two reservoirs, and lower the crest along the downstream Nysa river towns as well as the Wrocław conurbation; the Nysa is the main tributary to the Upper Odra. Selected works, e.g., the Dry polders Boboszow and Roztoki Bystrzycki, have already received the Environment and Construction Permits and their detail designs will be readied to start the tendering procedure in the Fall of 2015.

Component 3: Flood Protection of the Upper Vistula (Base cost €201.98 million). This Component intends to protect the Craców and Nowa Huta conurbation and industrial area, the Sandomierz-Tarnobrzeg industrial and agricultural area, and selected towns on tributaries in the sub-basins of the San and Raba rivers. The works comprise the re-construction and extension of dikes and embankments along the Vistula to replace old unreliable dikes, the bank stabilization and strengthening with rip-rap, revetments, etc., and the construction of Dry polders and overflow areas (along the Serafa tributary, and 1 each in the San tributary and the Raba tributary) to increase upstream water retention, and interventions for river training and to adjust existing weirs and barrages to pass larger floodwaves. Through the Component 4 additional support will be provided for the preparation of main parts of the River Basin Management Plan and the Investment Prioritization Plan for the Upper Vistula, applying the methodologies for integrated water resources management to complex investments with large footprint. Selected works, such as the Sandomierz embankments, have already received the Environment and Construction Permits and their detail designs will be readied to start the tendering procedure in the Fall of 2015.

Component 4: Institutional strengthening and Enhanced Forecasting (Base cost €155.80 million). This Component will selectively support the strengthening of institutional capacity in priority areas: (i) Enhancing the emergency preparedness along the main rivers and their tributaries in South and West Poland by enhancing the forecasting and operational water management capacity, (ii) Strengthening the procedures and capacity to prepare river basin management plans and investment prioritization plans that are compliant with the EU Water Framework Directive and Flood Directive, (iii) strengthening the impact monitoring, and (iv) enhance the communication capabilities. The assistance to applying integrated water management and investment scenario analysis for river basin management planning and management and investment prioritization will be focused on the Bobr-Kwisa River (in the Lower Odra), and the Upper Vistula part upstream of Cracow (and including the Cracow passage), the San catchment, the Raba catchment, the Wisloka catchment and the Dunajec catchment—key areas of the basin with a complex hydrology and various investment options to be studied. The impact monitoring will take the form of the development of procedures and guidelines for, and the conduct of, surveys for disaggregated analysis of flood impacts and impacts from flood protection, and of citizen engagement; this capability will enhance the government's capability to target future investments better and decide on cost-effectiveness. In general, the Project will closely monitor the country's progress in meeting the requirements under the EU WFD and EU FD and it will support institutional reform steps with studies and dialogue. As part of this, funding will be provided to facilitate peer-to-peer dialogue on integrated water resources management with another appropriate EU Member State that is considered to have successfully transposed the EU acquis. A national communication strategy on floods will be developed.

The forecasting capability and the establishment of Operation Centers, will be carried out at the RZGWs of Wrocław and Cracow, and the IMGW-PIB (Cracow Office). The activities comprise the installation of new-generation telemetric weather stations and modernization of the POLRAD

network, expansion and upgrading of the hydrological stations, incorporation of more performing simulation software, and improvement of flash-flood forecasting. The Operations Centers are control rooms that on one hand will mine forecasting data, simulate likely run-off scenarios and support early warning and decision support processes for emergency response; and on the other, operate infrastructure such as weirs, reservoirs and dry polders to manage the containment and release of flood-waves.

Component 5: Project management and studies (Base cost €41.44 million). This Component will fund notably the PCU operation and TA teams for the PCU and PIUs operation, office equipment and incremental operating costs. The studies will, i.a., cover the preparation of follow-up investments and the development of a project-based communication strategy. The TA teams will be recruited starting in Fall 2015.

The Project is categorized as environmental category B due to the fact that it will fund only a small proportion of carefully selected investments described in the ESMF that covers the Odra and Vistula River Basins. The proposed Project comprises a selection of first-priority investments and measures that were selected after many years of basin-wide analysis and studies (that started in year 2000), complemented with detailed case-by-case analysis of each selected item.

These proposed flood investments and measures were drawn from, and fully embedded in the policy and regulatory documents that are required under the EU Water Framework Directive (WFD), foremost the River Basin Management Plans (RBMPs) that are fully compatible with EU requirements. Between 2007 and 2013 the first “generation” of RBMPs for all basins was prepared, integrating water management and environmental objectives, based on year-long extensive public consultation, and drawing in a century of ground observations. While the 2013 Plans were judged “overall not compliant” with the WFD, they do meet many of the specific WFD criteria and Bank requirements. Because investments in basin management comprise small and large items, the EC’s DG Environment agreed in November 2014 upon the submission of new interim Updated Master Plans that a “List 1” of 2, 100 items are acceptable because these are well manageable and not requiring basin-wide analysis, while another 450 items on “List 2” are deemed complex and having a large footprint, requiring full basin-wide analysis through an acceptable RBMP, to be done after 2015. More information on current status of planning, policy and regulatory developments in respect to River Basin Management Plans is available on <http://www.apgw.kzgw.gov.pl/en/news/-/the-river-basin-management-plans-are-ready-for-public-consultations/newsId/7040b75fe40f73cd5b4db4a31a10e0b4> of the National Water Management Authority (KZGW). The summary status of water bodies within Odra and Vistula River Basins is contained in the ESMF.

For the Project, a selection of priority investments and measures was agreed upon on the basis of “list 1”. The selection was guided, foremost by the locations that had experienced historical records of devastating nature (“hot spots” that are recognized to be particularly vulnerable to floods, yet where mitigation measures would probably be cost-effective without being environmentally or socially complex), by the desire to work in coherent areas, where it would be possible to build on the lessons learned and the institutions developed under the on-going Odra River Flood Protection Project, and where a generally good level of institutional readiness was confirmed. The basic criteria for selection of investments were: prioritization within the context of the RBMPs and comparison of all possible combinations of investments to identify the least-cost and lowest-impact variants; economic analyses to select cost-effective options including a risk-based approach to investments; creating “room for the river” and flood wave retention capacity upstream, rather than constraining river flow by dikes; integration with environmental values and protection of habitats; management plans based on broad consultation with stakeholders; and sustained financing through fee collection and/or transfers from

the national or regional budgets. The Project scope includes less than one quarter of the long list in “List 1” of the EC. Certain proposed investments in “List 1” were excluded from the Project - notably where they would possibly affect vulnerable areas, habitats and/or riverine forests - including some Natura 2000 sites (Poland has declared essentially all its vulnerable habitat areas as protected areas). For such investments, more extensive variant analysis will be required. Beside of regular safeguards analyses, the individual selected works and measures were reviewed through mathematical simulation of water flow and flood routing to ascertain that they do not create incremental negative impacts on downstream or upstream communities, and, where possible, to have or enhance the positive impact. It is important to note that the majority of the investments concern rehabilitation and modernization of already existing structures.

An Environmental and Social Management Framework (ESMF) has been adopted as appropriate safeguards instrument for Appraisal, since while the sub-project investments have been identified, these have not been yet designed and prepared. In several cases where the locations are clearly identified and design exists, they were found to be old and outdated, thus requiring further review and confirmation. The site-specific EMPs will be successively prepared during next stages of Project implementation, as soon as the locations and basic design details become fully known and confirmed.

It is agreed that the Bank safeguards policies would apply to physical works under components 1, 2 and 3 as well as to TA activities under component 4. It is further agreed that all Terms of Reference provided under the Project will be fully compliant with the Bank safeguards policies.

#### **4. Project location and salient physical characteristics relevant to the safeguard analysis (if known)**

The Project will provide three distinct areas with flood management infrastructure and related measures: (i) the Middle and Lower Odra; (ii) the Nysa-Klodzko valley, a medium-sized sub-basin of the Upper Odra; and (iii) the Upper Vistula. The population of the regions in the proximity of the proposed works and measures is estimated to be about 19 million, of which it is estimated that about 5% is directly exposed to the floods (or: 950,000), and in total about half is exposed to flood-related impacts, physically, economically and/or socially.

Component 1 is located on Odra around and approximately 100 km upstream from city of Szczecin and include towns of Slubice and Gryfino, as well as number of other settlements. Component 2 is located within Nysa-Klodzko Valley, and include stretch from Klodzko to Bardo. This component also covers the stretch of Nysa River downstream from Valley along its route and to the point of confluence with Odra River. Component 3 is located in area around city of Cracow, the Sandomierz-Tarnobrzeg industrial and agricultural area, and selected towns on tributaries on its sub-basins of the San and Raba. The civil works in these areas will include rehabilitation of various river training works as well as construction of retention basins and dry polders, dredging, rehabilitation of pumps and other mechanical equipment and reconstruction of bridges. At this point details of the program, including precise number and nature of structures is not fully defined. However, within each component there is a number of priority investments that have already been identified. The areas along Odra are known to be environmentally valuable and a number of protected areas exist. The list and location of these areas are presented in ESMF and are known to the designers, and they are not likely to be seriously at risk of the works and the flood infrastructure. Rehabilitation of the existing and design of new structures will be undertaken in full compliance with EMF and Polish national legislation.

Some of the works under consideration would involve the rehabilitation of existing infrastructure in

mostly government-owned lands located in sparsely populated peri-urban and rural areas (e.g., rehabilitation of existing dikes and groynes). In these cases the impacts will occur mostly on existing footprint and those related to land acquisition would be limited. However, other interventions under consideration, such as construction of new structures and dry polders, particularly in the Nysa-Kłodzko Valley and some locations in the Upper Vistula could involve new footprint and more salient impacts that will be identified and addressed through the RAPs.

## 5. Environmental and Social Safeguards Specialists

Jorge E. Villegas (GSURR)

Nikola Ille (GENDR)

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	In order to assess the possible environmental and social impacts of the proposed project and plan to mitigate possible negative environmental impacts of proposed investments, the Borrower has prepared and disclosed an Environmental and Social Management Framework (ESMF) for the Odra and Vistula River Basins. However, the prepared ESMF discusses possible impacts of up to 600 measures that were drawn from, and fully embedded in the policy and regulatory documents that are required under the EU Water Framework Directive (WFD), and the River Basin Management Plans (RBMPs) that are fully compatible with EU requirements. As such, the ESMF is considering a significantly broader impacts and goes beyond the limited invests that will be funded under the Project. For the Project, a selection of priority investments and measures was agreed upon on the basis of “list 1”, which includes investments and locations that had experienced historical records of devastating nature, yet where mitigation measures would be cost-effective without being environmentally or socially complex. Beside the basin-scale ESMF, separate site-specific Environmental Management Plans (EMPs) will be prepared for all identified investments in due course. At the first instance, the EMPs are being prepared for the investments which will start in 2015 - Protection of the town of Slubice (Comp. 1), Construction of Dry Polders Boboszow and Szalejow Gorny (Comp. 2) and Protection of Sandomierz (Comp. 3) – and these are expected to be prepared by September 2015.
Natural Habitats OP/BP 4.04	Yes	Based on available information, the Project will have significant positive environmental impacts in terms of protecting floodplains and aquatic ecosystems.

		<p>At the same time, the main potential threats while executing the project-specific types of activities are related to change of water regime and consequently impact on flora and fauna in the periodically-flooded areas, which, if not properly managed, could create significant changes to local habitats. However, application of selection criteria related to each particular investment to be funded under the Project, as described above, and exclusion of those that may have larger than low or negligible impact will ensure that this risk will not materialize.</p> <p>The greatest majority of identified activities will be undertaken outside the nature protected areas, which is particularly true for components 1 and 3. However, in some cases the activities will be implemented partly or completely within the areas of specific nature protected regime - and besides strictly applying selection criteria for those activities, a special emphasis in EMPs will be paid to reducing and mitigating potential negative impacts, which will chiefly be felt during the construction phase. The activities in nature protected areas will be limited to restoration of the existing linear flood defense infrastructure and, in small number of cases, to local dredging aiming to restore the natural flow of water.</p> <p>The Project will also finance construction of several overflow areas - dry polders. Since the specific locations of these are presently being finalized, the Project will, beside ensuring application of selection criteria again during the feasibility design stage require for each of the polders to be carefully evaluated in both positioning, sizing and impacts, to ensure that possible adverse effects are minimized and adequately mitigated. Overflow areas and/or polders with main or major negative impacts will be assigned to other funding in the future after appropriate further studies.</p>
Forests OP/BP 4.36	No	The policy is not triggered as the Project will not fund any activities related to forest management and/or exploitation. The impact on riverine forests is covered in ESMF as part of the compliance with OP4.01 and under OP 4.04.
Pest Management OP 4.09	No	N/A

Physical Cultural Resources OP/BP 4.11	Yes	Although the physical cultural resources are not expected to be encountered on river training works in floodplains, near and within the cities of Cracow, Sandomierz and Slubice the works will be carried out near the protected cultural heritage buildings. Additionally, rehabilitation of embankments in these and other cities will likely result in chance finds. Appropriate provisions for archeology investigation and rescue works near these buildings, and for chance finds have been included in ESMF.
Indigenous Peoples OP/BP 4.10	No	The policy is not triggered.
Involuntary Resettlement OP/ BP 4.12	Yes	The project's key potential adverse social impacts relate to land acquisition that could lead to physical and economic displacement. Some of the works involve rehabilitation of existing infrastructure (e.g., rehabilitation of existing dikes and groynes) will have limited adverse social impacts. Other interventions under consideration, such as construction of new structures and dry polders, particularly in the Nysa-Kłodzka Valley and some locations in the Upper Vistula, would require land acquisition involving economic displacement (e.g., from agricultural lands) and resettlement of rural households. Accordingly, the Borrower has prepared a Land Acquisition & Resettlement Policy Framework (LA&RPF) for the whole project. The LA&RPF is based on Polish regulations, the WB's policy on Involuntary Resettlement (OP 4.12) and lessons learned from the Odra Flood Protection Project. The LA&RPF was disclosed locally for consultation with relevant stakeholders. For those sub-projects that are defined and are expected to be built during the first 12 month of project implementation, and for which land acquisition is required, the Client will prepare and disclose site-specific Land Acquisition & Resettlement Action Plans (LA&RAPs) following the parameters defined in the LA&RPF and in line with Polish regulations and WB's OP 4.12.
Safety of Dams OP/BP 4.37	Yes	Although the final selection of polders to be rehabilitated or executed has not been made for all Components, it is known that some of the polders will include construction of dams and weirs. Further, it is likely that at least 2 of the polders-reservoirs in the Nysa-Kłodzko Valley (e.g., Roztoki Bystrzycki



		and Boboszow) in Component 2, (and, potentially, Dobczyce (in Component 3 -- TBC) will include dams/embankments higher than 15 meters and with capacity over 5 million cubic meters. Due to this fact, the Project Coordination Unit retained the independent panel of dam experts that already exists on the Bank funded Odra River Basin Management Project, and expands its Terms of Reference accordingly. The Panel of Experts have already started review of feasibility studies (where existing), conceptual designs and other available documentation. The Panel will be retained and will continue working on the Project during its duration. Design of all polders to be funded under the Project will be prepared in full compliance with the Safety of Dams policy.
Projects on International Waterways OP/BP 7.50	Yes	About 160km of the Odra's 854km of total length is the so-called Border Odra (a sparsely populated part of the Lower Odra) which is shared by Poland and Germany. The Odra river basin measures 122,000km <sup>2</sup> , of which 90% lies on Polish territory, and 5% each on German and Czech territory. The Vistula river is quite different. It lies for about 95% inside Polish territory and the riparian countries Slovakia, Ukraine and Byelorussia comprise only minor portions of the upper watersheds of certain tributaries; thus there are no downstream externalities. Based on LEG recommendation, all riparian countries to the Odra and Vistula rivers were notified. A Polish-German Government Commission for Cross-Border Cooperation is active at Ministerial level, with involvement of, on the Polish side the Vojevodes, and on the German side, the Länder representatives. In parallel, the trilateral Odra River Commission addresses the technical aspects of the river issues of common interest. The Odra Commission has agreed on the technical specifications of flood protection along the Border Odra. For the project's purposes, the Polish government issued in September 2014 a Notification to the riparians to inform them of the project. By January 31, 2015, the stated deadline for responses, Germany, Czech Republic, Byelorussia and Ukraine have not submitted objections, while Slovakia sent a letter supporting the project but requesting information sharing in case there would be works on the upper part of the Dunajec (however, the Project is

		not planning to be active in that sub-basin).
Projects in Disputed Areas OP/ BP 7.60	No	

## II. Key Safeguard Policy Issues and Their Management

### A. Summary of Key Safeguard Issues

#### 1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The theoretical range of potential impacts of Project-funded activities is large and depends upon the nature of any particular works, their localization and/or presence of protected areas in their vicinity. However, the most significant impacts of works, if not executed within due care, relate to change of water regime and hydrologic parameters, and/or change of water quality as a result of use of various materials and chemicals. The works could also have impact on the surrounding protected areas, including flora and fauna. Some negative impact could also be felt in ground-water quality, although on a localized scale. The expected environmental impacts could be related to handling of construction material, construction waste, and the health and safety of workers and general population that need to be close to the construction area.

However, during the Project preparation it has been agreed that the Project-funded activities will comprise only of part of those investments as listed on “List 1” in the Updated Master-Plan, as approved by EC’s DG Environment (see above) - that have low negative impact, neutral or positive impact. The Project-funded investments will be further selected based on several selection criteria, among other: (i) creating “room for the river” and floodwave retention capacity upstream, rather than constraining river flow by dikes; (ii) investments that can ensure integration with environmental values and protection of habitats; (iii) ones that are part of the management plans based on broad consultation with stakeholders. The specific investments, although belonging to “List 1”, were excluded from the Project financing if they would possibly affect vulnerable areas, habitats and/or riverine forests - including some Natura 2000 sites.

Mitigation of potentially negative impacts related to Project-funded activities will be undertaken by (i) strict compliance with the national legislation in area of health, safety and environmental protection; (ii) strict enforcement of all conditions contained in the water, construction and environmental permits – that will be issued by the relevant national authorities; (iii) compliance with the Bank policies as defined in the Project-related documents, including ESMF, RPF and legal agreements; (iv) design and implementation of site/contract-specific EMPs, in line with the Bank OPs and national legislation.

Provided that mitigation of potential negative impacts is undertaken as described above, it is estimated that the Project will have neutral to positive overall impact and will contribute to restoration of favorable environmental conditions, particularly in areas subject to restoration of the flood plains and bank stabilization/dredging.

No large, significant or potentially irreversible environmental impacts have been identified, nor are they expected during the execution of the Project related civil work activities.

#### 2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:

Potential long-term impacts could relate to change of land use in case of construction of dry polders and possible resettlement activities. However, these are expected to be of a rather small-scale if mitigated and managed by applying the Bank and national safeguards policies. On the other side, the positive impacts of the Project will lead to reduced flood risk for over 950 thousand people that are currently under a direct risk.

Environmental and social mitigation measures and safeguard reviews have been put into place to minimize any other adverse impacts from the Project-related activities.

**3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.**

Current situation in the Odra and Vistula River Basins and the Project area has been analyzed as a part of ESMF, and a number of alternatives considered for each of the Project components. These alternatives included options from “no activities” to “soft”/biological activities only to “hard construction activities” and mixture of “soft” and “hard” measures. While in the urban areas, due to lack of space available, there were very few options than to raise and strengthen the existing infrastructure, in other areas application of dredging, widening of the river bed, rehabilitation of groynes, construction of dry polders and other measures were also recommended to be applied on case-by-case basis. The final decisions will be made bearing in mind multi-functional criteria, that included, among others, the following parameters applied to water probability of 1% (flood level 1 in 100 years): Reduction of value of potential losses within the reach; Reduction of risk for people within the reach; Area of land impacted; Value/number of protected public structures; Impact on protected areas - national parks, natural reserves, Natura 2000 sites; Impact on national and regional ecological corridors; Capital expenditures.

Selection of the Project-funded activities/infrastructure, as explained above, and application of further criteria to investments contained within the “List 1” will ensure that potential adverse impacts are already low or negligible. Application of the guidance notes as described in ESMF and subsequent design and implementation of environmental management and mitigation plans in each particular case will provide further minimization and/or avoidance of adverse environmental impacts.

**4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.**

Adequate environmental and social assessment and management activities will be implemented by the Borrower. Poland has a robust national framework on environmental and social management and additionally there is a good track record from the previous Odra Project in relation to the commitment and capacity of the Borrower to implement the required environmental and social measures in line with local requirements and the WB safeguards. The Project will build on already existing capacity of the Odra River Basin Project, and a number of experienced staff currently working on it will be gradually transferred to Odra/Vistula Project – including experienced environmental and social staff. During the first year of Project implementation the additional training will be provided by the Bank for PIU and consultant’s staff to further increase their capacity, although most of the capacity building is expected to be undertaken by local “on-the-job” training and mentoring by Borrower’s staff already experienced in application of Bank safeguards policies.

**5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.**

The Framework level instruments (ESMF and RPF) have been disclosed for consultation with

relevant stakeholders at the national and regional levels, including relevant NGOs. The sub-project level instruments such as EMPs and RAPs will be disclosed locally and directly affected people will be consulted.

### **B. Disclosure Requirements**

<b>Environmental Assessment/Audit/Management Plan/Other</b>	
Date of receipt by the Bank	15-Jan-2015
Date of submission to InfoShop	06-Feb-2015
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	11-Feb-2015
"In country" Disclosure	
Poland	09-Feb-2015
<i>Comments:</i> The EMF has been posted on the Info boards of the World Bank Office as well as on websites of the Ministry of Environment and PCU.	
<b>Resettlement Action Plan/Framework/Policy Process</b>	
Date of receipt by the Bank	12-Dec-2014
Date of submission to InfoShop	17-Feb-2015
"In country" Disclosure	
Poland	13-Feb-2015
<i>Comments:</i> The Polish version of the LA&RPF was posted on the Info boards of the World Bank Office as well as on websites of the Ministry of Environment and PCU.	
<b>If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.</b>	
<b>If in-country disclosure of any of the above documents is not expected, please explain why:</b>	

### **C. Compliance Monitoring Indicators at the Corporate Level**

<b>OP/BP/GP 4.01 - Environment Assessment</b>	
Does the project require a stand-alone EA (including EMP) report?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
<b>OP/BP 4.04 - Natural Habitats</b>	
Would the project result in any significant conversion or degradation of critical natural habitats?	Yes [ <input type="checkbox"/> ] No [ <input checked="" type="checkbox"/> ] NA [ <input type="checkbox"/> ]
If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?	Yes [ <input type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input checked="" type="checkbox"/> ]
<b>OP/BP 4.11 - Physical Cultural Resources</b>	
Does the EA include adequate measures related to cultural property?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]

Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
<b>OP/BP 4.12 - Involuntary Resettlement</b>	
Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
<b>OP/BP 4.37 - Safety of Dams</b>	
Have dam safety plans been prepared?	Yes [ <input type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input checked="" type="checkbox"/> ]
Have the TORs as well as composition for the independent Panel of Experts (POE) been reviewed and approved by the Bank?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
Has an Emergency Preparedness Plan (EPP) been prepared and arrangements been made for public awareness and training?	Yes [ <input type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input checked="" type="checkbox"/> ]
<b>OP 7.50 - Projects on International Waterways</b>	
Have the other riparians been notified of the project?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
If the project falls under one of the exceptions to the notification requirement, has this been cleared with the Legal Department, and the memo to the RVP prepared and sent?	Yes [ <input type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input checked="" type="checkbox"/> ]
Has the RVP approved such an exception?	Yes [ <input type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input checked="" type="checkbox"/> ]
<b>The World Bank Policy on Disclosure of Information</b>	
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
<b>All Safeguard Policies</b>	
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
Have costs related to safeguard policy measures been included in the project cost?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ]

### III. APPROVALS

Task Team Leader(s):	Name: Guy J. Alaerts, Winston Yu
<b>Approved By</b>	

Regional Safeguards Advisor:	Name: Agnes I. Kiss (RSA)	Date: 18-Feb-2015
Practice Manager/Manager:	Name: Dina Umali-Deiningger (PMGR)	Date: 18-Feb-2015