

POLAND

Answers to the six questions included in the Special Rapporteur on Human Rights and Environment Questionnaire, to the report on air pollution and human rights for the 40th session of the United Nations Human Rights Council, planned for March 2019

I. Please provide specific examples of constitutional provisions, legislation, regulations, standards, policies and programmes in relation to preventing, reducing, or eliminating air pollution, both outdoor and indoor. Please include, inter alia, any instruments that refer directly to the right to a healthy environment and/or the right to breathe clean air.

Ad. I. Inadequate air quality in Poland is mainly caused by the emission of pollutants from the residential (domestic and municipal) sector, primarily due to improper combustion of low-quality solid fuels in outdated furnaces/ heating devices that do not meet emission standards. Transport is in turn the second sector responsible for inadequate air quality.

Environmental and in particular air pollution, have a significant impact on human health, causing many diseases, including respiratory and circulatory systems, and the greatest impact on human health is observed in urban areas. The most vulnerable are sensitive groups, i.e.: children, the elderly and people with respiratory diseases. Health problems caused by the exposure to air pollution cause increased costs of health care, i.e. expenses incurred each year for the treatment of diseases that are transferred by citizens, employers and the state budget.

On the other hand, it should be remembered that measures to protect the environment, including air, cost a lot and the level of these costs should be socially acceptable, because these costs are borne by the society, some of taxes - by the budget, the second part directly from private funds of citizens from the local community, that is, their own financial resources.

In this situation, when considering protection measures aimed at protecting the health of citizens, one should also remember about the social aspect related to the level of affluence of communities and citizens individually, and consider it carefully, so that the protective measures taken do not lead to "social exclusion", or/and "energy poverty" of the poorest population groups, especially in such countries as Poland, where the level of earnings, despite the relative economic successes, is still low.

Therefore, in the situation of acceptance for implementation and inclusion in international regulations, in particular overly ambitious goals of the EU, in particular the tightening of existing requirements - air quality standards, which are still not met by most Member States (over 16 in PM10 standards, a dozen in NOx) poses a threat of stagnation or at least a lack of progress in the implementation of air quality improvement caused by the imbalance between expenses - even very justified ones - and the revenues that can be used to pay for these expenses. It is obvious that first you need to work out measures that you can later invest in, for example, environmental protection.

In view of the above, the Government of the Republic of Poland (Polish Government) is very attentive and empathic to take corrective action so as not to counteract the effects of various prosocial programs (including "500+") aimed at protecting citizens, by accelerating the process of improving air quality in Poland, addressed primarily to the domestic and municipal sector, and secondly to the transport sector.

A. Actions, strategic decisions at the national level, having a major impact on accelerating the improvement of air quality process in Poland, laying the foundations for proper organization of this process

1. Ordinance No. 40 of the Prime Minister of March 16th, 2018 *regarding the appointment of the Prime Minister's Proxy for the Clean Air Program* (MP item 293), whose tasks include monitoring and analyzing the manner of implementation of actions resulting from the Council of Ministers Economic Committee's recommendations on the actions necessary to be taken in connection with the occurrence of high concentrations of air pollutants in a large area of the country - so-called "*Clean Air*" program and proposing actions to optimize its implementation, as well as chairing the work of the Steering Committee on the National Program for the Protection of Air
2. Announcement by the Prime Minister on February 22nd, 2018 of the governmental Pilot *Program of comprehensive thermo-modernization of single-family houses entitled "Stop Smog"*, which will cover 23 of the 33 most polluted Polish cities on the list of the World Health Organization (WHO);

B. Legislative activities aimed at creating a formal, legal and administrative environment conducive to the acceleration of air quality improvement processes in Poland, addressed first of all to the main sector responsible for inadequate air quality in Poland - the domestic and municipal sector, which means also to the transport sector:

1. reducing the negative impact of the domestic and municipal sector:

- preparation of the *Ordinance of August 1st, 2017 of the Minister of Development and Finance on requirements for solid fuel boilers (Journal of Law of 2017, item 1690)*; thanks to which boilers not meeting emission standards will be eliminated from the market
- preparation of the *Act of November 21st, 2008 on supporting thermo-modernization and renovation (Journal of Law of 2018, item 966)*; in order to structure the issues of thermal modernization of buildings, in particular residential ones - subject to financing under the new national instrument of the Priority Program "Clean Air"
- preparation of the "*fuel package*" - a package of regulations governing the fuel market in Poland, including:
 - *Act of July 5th, 2018 amending the Act on Fuel Quality Monitoring and Control System (Journal of Law of 2018, item 427 and 650)*, which entered into force on September 12th, 2018 and provides, among others introduction of quality standards for coal and a ban on the sale of the worst quality fuel to consumers in the municipal and household sector
 - *Regulation of the Minister of Energy of September 27th, 2018 on quality requirements for solid fuels (Journal of Law of 2018, item 1890)*
 - *Regulation of the Minister of Energy of September 27th, 2018 on the sampling method of solid fuels (Journal of Law of 2018, item 1891)*,
 - *Regulation of the Minister of Energy of September 27th, 2018 on quality certificate templates for solid fuels (Journal of Law of 2018, item 1892)*,
 - *Regulation of the Minister of Energy of September 27th, 2018 on methods for quality testing of solid fuels (Journal of Law of 2018, item 1893)*.

Preparation of the above mentioned "Fuel package" - a package of regulations concerning the management and control of the solid fuel market in Poland aiming at accelerating the process of improving air quality in Poland by eliminating the use of low-quality solid fuels, in particular low-quality coal fuels and damp wood especially in the domestic-municipal sector.

- promoting *electrical heating – anti-smog tariffs*

- Preparation of the *Regulation of the Minister of Energy of December 29th, 2017 on detailed rules for the formation and calculation of tariffs and settlements in electricity trading (Journal of Law of 2017 item 2500)*; basing on which distribution companies have prepared distribution tariffs with reduced rates - "anti-smog tariffs", in addition, energy sellers have prepared preferential price lists for electricity suppliers for customers using the anti-smog tariff.

Any recipient in the household can benefit from the anti-smog tariff. It will be beneficial for consumers who have increased electricity consumption at night, so for consumers who will exchange heating for electrical heating and use it during the night and/or buy an electric car and will charge it during the night time.

- change of air protection regulations in terms of CJEU judgement

- In addition, the Ministry of the Environment conducts legislative work - *amendment of existing regulations, including the Act of April 27th, 2001 - Environmental Protection Law (Dz.U. 2018, item 799, consolidated text)* in connection with the necessity of implementation of unfavorable ruling of the Court of Justice of the European Union (CJEU) against Poland announced on February 22nd, 2018, in connection with the complaint of the European Commission regarding the exceedance of EQS for fine particulates PM10 persisting for years, in which Polish authorities were accused of failing to meet the requirements of European Union law, i.e. the *Directive of the European Parliament and of the Council of 21 May 2008 on air quality and cleaner air for Europe (OJ L 152, 11/06/2008, p. 1) (the "CAFE" Directive)*, i.e.:
Consequently, it is necessary to modify the provisions of art. 91 and art. 84 of the above mentioned Environmental Protection Law in accordance with the European Commission's guidance in terms of the allegation made by the CJEU "air protection programs determine appropriate actions, so that the period during which the admissible and target levels are not kept, was as short as possible".
- Following the CJEU's judgement, the Regulation of the Minister of Environment on air protection programs and short-term action plans will be amended, a new detailed scope of air protection programs and short-term action plans, as well as reports on their implementation will be defined, which will allow to adjust the provisions of the Regulation as above to the European Commission Guidelines on the Commission's Decision 2011/850/EU of July 15th, 2013 - extending the scope of information on the adopted Air Protection Programs (POPs) to be submitted by voivodship management boards.

2. Reducing the negative impact of the transportation sector:

- preparation of the act of January 11th, 2018 on electromobility and alternative fuels (Dz.U. 2018 item 317); electromobility is becoming an important element of economic policy, as well as environmental management policy, in particular air protection, especially in the context of the sentence of the CJEU ordering Poland to speed up the process of improving air quality, and in particular to adhere to air quality standards in Poland.

In addition, on March 16th, 2017, a strategic document has been adopted by the Council of Ministers - the Electromobility Development Plan (PRE), which fills a gap in the approach to support for economic development, also in terms of ecology and is an effective tool in the fight against air pollution from the transport sector.

3. Within the scope of information:

- the regulation of June 6th, 2018 on the scope and manner of providing information on air pollution (Dz. U. item 1120) was published on June 11th, 2018, which adapted the national legislation to the European Commission Guidelines of July 15th, 2013 relating to Commission Decision 2011/850/EU of December 12th, 2011 laying down rules for the application of Directives 2004/107/EC and 2008/50/EC of the European Parliament and Council regarding the mutual information exchange system and reports on ambient air quality.

II. Please provide specific examples of good practices in preventing, reducing, or eliminating air pollution, both outdoor and indoor. These examples may occur at the international, national, sub-national, or local level. Examples may involve air quality monitoring: guaranteeing procedural rights (e.g. public access to air quality information, public participation in decision-making about air pollution, access to remedies); air quality legislation, regulations, standards, and policies; initiatives to reduce air pollution from specific sectors (e.g. electricity generation, industry, transportation, indoor cooking, heating, and lighting); laws, policies and programmes to protect vulnerable populations from air pollution; laws, policies, or programmes to concurrently address air pollution and climate change; and effective enforcement of rules governing air pollution.

Ad. II. Measures to eliminate/limit emissions of pollutants from economic sectors, in particular domestic-municipal and transport:

1. *Implemented at local level, in municipalities* – Environmental protection programs (POPs), Short-term Action Plans (PDKs), Low Emission Reduction Programs (PONE).

Replacement of solid fuels heating devices is the main corrective action covered by air protection programs prepared on the basis of art. 91 of the Act of April 27th, 2001 - Environmental Protection Law (Journal of Law of 2018 item 799, as amended) by voivodship management boards, in form of a local law act as voivodship regional assembly resolutions. These activities are also an important element of the municipal Low Emission Limiting Programs implemented by local government authorities.

Currently, there are 56 POPs and 21 PDKs being realized in Poland.

2. *Implemented at regional level, in voivodships* – anti-smog resolutions: 13 anti-smog resolutions are implemented in Poland: for the city of Krakow, and for the following voivodships: Lesser Poland, Silesia, Opole, Masovia, Łódź, Lower Silesia, Greater Poland and Podkarpackie.

3. *Implemented at the national level* creating an administrative and financial environment, besides the above mentioned legislative activities:

financial support for the air quality improvement process:

▪ In September 2018, the Polish government announced the Priority Program named "Clean Air", whose operator is the National Fund for Environmental Protection and Water Management (NFOŚiGW), cooperating with 16 Voivodship Funds for Environmental Protection and Water Management (WFOSiGW) and Bank Ochrony Środowiska S.A. The purpose of the above mentioned program is to increase the efficiency of single-family residential buildings and reduce the volume of emissions of dust and other pollution from heating installations of existing and newly built single-family houses. The budget for the period 2018-2029 amounts to approx. PLN 103 billion (EUR 25 billion). The funds come from NFOŚiGW, WFOSiGW and the European Union.

The advantage of the "Clean Air" Program is a comprehensive approach to the problem, consisting not only in the exchange of heat sources, but also in a comprehensive thermal modernization of buildings. The Polish Government estimates that within the Program, it will be possible to exchange about 3 million inefficient heat sources, which in turn may bring an ecological effect in form of reduced emissions of following pollutants: PM10 dusts by 68400 mg/year (including PM2,5 dust) 61100 mg/year and Benzopyrene by 87 mg/year). This is currently the main program of financing of air quality improvement in Poland having national coverage.

Although it is also necessary to mention remedial actions aiming at improve air quality in areas with exceedances of air quality standards under the applicable Air Protection Programs (POPs) , Short-term Action Plans (PDCs) and anti-smog resolutions.

- The priority for NFOŚiGW is to improve air quality, as evidenced by the above-mentioned Program, but also other priority programs that affect the improvement of air quality in Poland. It should be stressed that from 01.04.2017 to 30.08.2018, NFOŚiGW signed a total of 279 contracts for the amount of PLN 2,663,876,710. These contracts were signed, among others under such Programs as:
 - ✓ improvement of air quality Part 2) Reduction of energy consumption in construction,
 - ✓ Measure 1.2 OPI & E 2014-2020 "Promoting energy efficiency and the use of renewable energy sources in enterprises",
 - ✓ Sub-measure 1.3.1 OPI & E 2014-2020 "Promoting energy efficiency in public buildings",
 - ✓ Sub-measure 1.3.2 OPI & E 2014-2020 "Supporting energy efficiency in the residential sector 16 I 2018 - 26 III 2018".

sustainable development, combating pollution, increasing the use of renewable energy (RES)

- Sustainable development of renewable energy sources (RES) is one of the many solutions that has an impact on improving air quality; the use of renewable energy sources, including locally available resources, raw materials and waste indirectly contributes to reducing the emission of harmful gases and dust to the atmosphere, thus supporting the development and use of renewable energy sources, including geothermal energy in Poland, is one of the government's priority tasks included in strategic government documents such as: Sustainable Development Strategy till 2020 (with a view to 2030) and in the State's Raw Materials Policy. In 2017-2018, the Chief National Geologist expressed his opinion on the desirability of co-financing ten applications regarding the realization of exploratory wells in order to search for, identify and document thermal waters, among others in following communes: Łądek-Zdrój, Szaflary, Sieradz, Sochaczew, Koło, Turek and Tomaszów Mazowiecki.

Supporting clean transport

- On March 16th, 2017, the Council of Ministers adopted the strategic document: Electromobility Development Plan (PRE), which fills a gap in the approach to support economic development, including ecology, and is an effective tool in fighting against air pollution caused by the transport sector; followed by the creation of a Low-Emission Transport Fund, which shall finance initiatives in the area of use of alternative fuels in transportation.

Supporting air quality monitoring

- Since 2016, GIOŚ (Chief Inspectorate of Environmental Protection) as part of the Operational Program Infrastructure and Environment for 2014-2020, purchases measuring and research equipment for the air quality monitoring network belonging to WIOŚ (Voivodship Inspectorate of Environmental Protection) and has already purchased: analyzers for measuring gas pollution (SO₂, NO_x, CO, O₃, C₆H₆) - 30 pcs, collectors for manual measurements (reference) of particulate matter PM10/PM2,5 - 16 pcs, analyzers for particulate matter PM10/PM2.5 - 16 pcs, containers for mounting of measuring devices for air quality measurements - 8 pcs, mobile measuring stations for air quality measurements - 21 pcs (including 16 currently in delivery), extractors for the preparation of chemical analysis samples for the determination of concentration of polycyclic aromatic hydrocarbons, including benzopyrene in PM10 dust - 16 pcs (currently in delivery), equipment of the new KLRiW laboratory - 8 pcs. Until now, air quality monitoring in Poland has been reinforced by 83 pcs measuring devices, another 32 pcs are currently in delivery, including 16 mobile stations. The cost of devices purchased so far amounted to PLN 19,354,245.35.

monitoring – access to information

- According to the regulation on the scope and method of providing information on air pollution, the modeling results as well as short-term (three-day) forecasts will be transferred to GIOŚ, from January 2019 the forecasts of air pollution PM10 and NO₂ (from April for O₃, from October for SO₂) will be available on the "Air Quality" website of WIOŚ. Currently, WIOŚ is intensively working on creating a module for presenting forecasts at the above-mentioned website.

III. Please identify specific challenges that your government, business, or organization has faced in attempting to address air pollution and its impacts on human rights.

Ad. III. Challenges, barriers and limitations in the process of improving air quality

The analysis of methods of solving the problem of air pollution in Poland indicates the existence of barriers and limitations, especially in the area of systemic, legal, technical, financial, organizational and social solutions, having

a direct and indirect impact on the state of air quality, which affects the human rights. At national level - the Government of the Republic of Poland, and at the regional level in voivodships and locally in communes - local governments, consistently implement various initiatives to eliminate existing barriers and achieve systematic progress in this area, but there are still restrictions to be removed, to ensure that air quality standards resulting from national and EU regulations are met as soon as possible in order to ensure protection of health and living conditions of communities exposed to the negative impact of pollution in Poland.

Below, the most important challenges, barriers and limitations in the process of air quality improvement are presented:

- **systemic:** ► no separate priority for air protection in the operational programs adopted by the European Commission as part of the EU's Financial Perspectives for 2014-2020;
- **legal:** ► insufficient legal regulations within the scope of controlling natural persons using devices for solid fuel combustion by communal services, ► insufficient recognition of air quality issues in national legal regulations concerning spatial planning, ► insufficient legal regulations regarding obtaining funds for liquidation of the impact of the transport sector - e.g. medical treatment of road accident victims, limiting the effects of air pollution, excessive noise, etc.;
- **technical:** ► use of high-emission heating devices in domestic and municipal sector, ► low energy efficiency of residential buildings caused by the use of inappropriate building materials, as well as failure to adapt chimney flues of multi-family houses to change heating in a given apartment/flat and lack of adequate ventilation system in these buildings, ► preference of biomass as alternative fuel for hard coal, which is characterized by higher emission of fine dust than hard coal;
- **financial:** ► insufficient financial instruments intended for corrective actions in the area of domestic and municipal sector and lack of financial resources for corrective actions specified in air protection programs and related backlogs in their implementation, ► lack of support for cogeneration enabling reconstruction of old heating plants for cogeneration and exchange of amortized assets of existing heat and power plants, ► lack of co-financing and co-implementation of pro-effectiveness and pro-environmental actions by a third party within a wide range of public-private partnerships.
- **social:** ► selection of the cheapest heating method due to investment and operating costs, ► low public awareness on eco-behaviors: proper combustion of solid fuels, including hard coal, wood in boilers and fireplaces; the effects of waste incineration in unsuitable equipment, eco-driving.
- **organizational:** ► lack of a uniform database on sources of air pollutant emissions, which would be the basis for both monitoring carried out by the Environmental Protection Inspection, and for voivodship administrations preparing POPs, and other analyzes, ► lack of a uniform mathematical model used in the air quality assessment system for WIOŚ in Poland, lack of a uniform model recommended for use in the EU.

IV. Please specify ways in which additional protection is provided for populations who may be particularly vulnerable to air pollution (e.g. women, children, persons living in poverty, members of Indigenous peoples and traditional communities, older persons, persons with disabilities, displaced persons, and national or ethnic, religious and linguistic minorities).

Ad. IV. In addition to the above, in the answers to the questions, measures to eliminate/reduce emissions, in particular from the domestic/municipal and transport sectors, which has a direct impact on ensuring better health protection for all citizens, especially vulnerable groups, the Government of the Republic of Poland implements a series of pro-social programs, in particular such as "500+", "flat+", "availability+", "mother+", but this falls into the competence of other departments/ organizational units.

V. Please provide specific examples related to the regulation of businesses and other non-State actors in relation to the protection of human rights from air pollution and the fulfilment of their obligations in this regard.

Ad. V. In connection with the care for the health of citizens, for providing them with adequate conditions of living and functioning in society, but also the condition of the environment, in particular air, more and more different international legal regulations - EU and national - are created, which results in an increasing scope of obligations for entrepreneurs. One of the legal basis for the rights and obligations of small and medium enterprises in the field of environmental protection are the provisions of the abovementioned Environment Protection Law, which precisely defines the term of entity using the environment. According to art. 3 point 20 of the Act, this entity may be: an entrepreneur within the meaning of *the Act of November 19th, 1999 - The Law of Economic Activity (Dz.U. 2018, item 646)* and persons engaged

in manufacturing activity in agriculture in the field of agricultural crops, rearing or breeding animals, horticulture, vegetable growing, forestry and inland fishery; persons performing a medical profession as part of an individual practice or individual specialized practice; an organizational unit that is not an entrepreneur within the meaning of the Act - Business Law; a natural person not being an entity referred to in point a) using the environment to the extent that the use of the environment requires a permit.

Each entrepreneur has a number of environmental responsibilities that he must comply with:

1. **Producing annually > 1 ton of hazardous waste or > 5,000 tons of other waste**, they must apply for a permit to produce waste to the starosta [head of county administration]; pursuant to Article 17 paragraph 2 of the Act of April 27th, 2001 on wastes (Dz.U. No. 62, item 628, as amended), the producer of hazardous waste in quantities exceeding 1 ton per year or other than hazardous quantities in excess of 5 thousand tons per year is required to obtain a permit for the generation of waste.
2. **Producing hazardous waste > 100 kg per year**, must apply to the starosta for the decision approving the hazardous waste management program; and pursuant to Art. 17 sec. 1 point 1 of the aforementioned Act on wastes, the producer of wastes over 100 kg per year is obliged to obtain the decision of the competent authority approving the hazardous waste management program.
3. **Producing hazardous waste up to 100 kg per year or > 5 tons of other wastes** must submit to the starosta information on the generated waste and the methods of waste management in accordance with Art. 17 sec. 1 point 2 of the aforementioned Act.
4. **Permission to collect and transport waste** - in order to obtain it, the entity must submit an application to the starosta for a permit to conduct activities in the field of collection and transport of waste, as required by the Act on waste in art. 28. The application must meet the requirements set out in Article 28 para. 4 of the aforementioned Act.
5. **Records of pollutant emissions into the air**, the keeping of which is obligatory, updated every year, containing information on the quantity and types of gases and dust emitted into air, as well as data on the basis of which these quantities have been determined. The obligation to keep records and provide data on the basis of which fees have been calculated results from art. 287 para. 1 point 1 and art. 286 of the Environmental Protection Law as above.
6. **Records of water intake**, entities must keep records containing information on the quantity and quality of surface and underground water intake, updated annually; as well as submit the above list that is used to determine the amount of fees; the obligation to keep records and submit them to the voivodship marshal results from art. 287 para. 1 point 2 and art. 286 of the Environmental Protection Law as above.
7. **Records of discharged sewage**, updated annually, containing information on the quantity, condition and composition of sewage introduced into waters or into the ground, as well as submitting the above list that is used to determine the amount of fees; resulting from Art. 287 para. 1 point 3 and art. 286 of the Environmental Protection Law as above.
8. **Records of waste**, the entities are required to keep a quantitative and qualitative record of all waste (excluding municipal waste) in accordance with the accepted waste catalog and hazardous waste list, in accordance with art. 36 of the Waste Act. A full evidence must be kept by establishments that do not meet the conditions set out in the Ordinance of the Minister of Environment of December 11th, 2001 on types of waste or their quantity for which there is no obligation to keep waste records and the category of small and medium enterprises that can keep a simplified waste register (Dz.U. No. 152, item 1735), which are producing hazardous waste of more than 100 kg per year; other than hazardous waste, not being municipal waste, exceeding 5 tons per year.
9. **Handover of waste** - handover of waste is possible only to entities that have obtained the permission of the competent authority to conduct waste management activities; and art. 25 of the aforementioned Waste Act allows a waste producer to handover waste to another waste holder, but only to one who holds the aforementioned permit at the time of handing over of waste, unless such activity does not require authorization.
10. **Permits**, each entity (with the exception of exemptions as provided for in the Environmental Protection Law, Waste Act and Water Law) is obliged to have: - permission to emit gases or dust into the air, - water permit for the intake of surface or groundwater, - water permit for introduction of sewage into waters or soil, - permission for waste generation or decision approving a hazardous waste management program. According to art. 180 of the aforementioned Environmental Protection Law, the act of exploitation of the installation causing: - introduction of gases or dust into the air, - introduction of sewage into water or soil, - noise emission, - emission of electromagnetic fields is allowed after obtaining a permit if it is required by regulations in this area.

11. Fees for using the environment should be paid annually in case when the calculated amount will exceed the fee free amount - to the account of the marshal's office. Fees are enforced up to 5 years back.

VI. How do you ensure that the rights of environmentalists working on air quality issues (environmental human rights defenders) are protected? What efforts has your Government or business made to create a safe and enabling environment for them to freely exercise their rights without fear of violence, intimidation, or reprisal?

Ad. VI. The right to the environment, or otherwise the right to live in a healthy environment and to use it, was defined for the first time in the Stockholm Declaration adopted at the Conference, in Stockholm, in 1972. According to the abovementioned declaration, the basic human rights include the right to freedom, equality and appropriate living conditions in an environment of quality that allows living in dignity and prosperity. The basic dimension of the implementation of this right is expressed in ensuring that citizens participate in proceedings regarding making decisions that have a significant impact on the environment. To this end, appropriate regulations have been prepared and procedures have been created to allow participation in decision-making and the provision of information so that it is effective.

Appropriate legal instruments enabling the right to live in a healthy environment and to benefit from it are found in international law, including European Union law; public participation is possible at various stages of the decision-making process, which is regulated in art. 6, 7 and 8 of the *Aarhus Convention*. Public participation is also regulated by Polish law, in the following sources of national law: *the Constitution, laws, ratified international agreements, regulations and local law (e.g. local spatial development plan)*, and one of the basic legal acts is *the Act of October 3rd, 2008 on sharing information about the environment and its protection, public participation in environmental protection and on environmental impact assessments (Dz.U. 2017, item 1405, as amended)*. This falls into the competence of other units / departments.