TECHNICAL REVIEW POLAND RURAL ENVIRONMENTAL PROTECTION

Mr Stephen Litner World Bank

Dear Stephen

Thank you for forwarding me the relevant annexes of the Polish Rural Environmental Protection Project. I have had an opportunity to read the materials and offer this hastily prepared commentary.

The project clearly is one of substantial importance in the context of international waters and the specific situation applying to the Baltic.

Successfully conducted, this project should make a significant contribution which would have a significance in other areas suffering the same widespread problem.

My major comment on the papers are that the linkage between the complementary activities:

- 1. Technical assistance to farmers concerning good agricultural practices and
- 2. Support to farmers to invest in the construction of manure and slurry storage facilities is not clearly drawn.

I infer that the agronomic benefits to farmers are that by storing slurry for substantial periods they are able to withdraw it from storage and apply it to crops at times when there will be maximum benefits in terms of conversion of nitrate and phosphate to plants in their crops.

They thus achieve an agronomic, economic benefit and the community at large receives an environmental benefit because those nitrates and phosphates are locked up and do not reach the water courses as non-point source pollution.

It seems to me that if this is the case the project should seek to monitor and demonstrate the economic benefits which flow to farmers from the adoption of these practices. This would provide the greatest probability of the costs which in GEF terms are incremental, becoming eventually recognised as economically

beneficial to the farmers and communities and thus being internalised in the longer run.

Having said that, I reaffirm that the project is one of substantial importance. I note that the Polish government is in the process of legislating to support this measure and thus reduce non-point source pollution from agriculture. I note also that Poland is regarded as the country in economic transition which has the most advanced level of field-based knowledge in conducting non-point source pollution activities. These factors add to the possibility of a successful outcome.

It is not clear to me from the material which I have received, to what extent synthetic fertilisers play a role in the non-point source pollution burden flowing from Polish agricultural lands. They may not be a significant factor. However, if they are used there could be a potential to demonstrate economic substitutability if farmers use stored manure slurry instead of synthetic fertiliser. This may well be an attractive demonstration of cost efficient environment management.

With regard to the incremental cost analysis, it seems to me that the trans-boundary benefit under 1 b) would go beyond the increased coverage of manure storage to reflection of the global benefit of reduced pollution reaching the international waters of the Baltic. In the case of outreach and management, if we assume that the project will include a demonstration of the economic benefit to farmers of the adoption of the technology, then the trans-boundary benefit goes beyond wider understanding among farmers to an economic incentive to farmers to take up the technology and thus more rapidly reduce the flow of non-point source pollution to the water courses.

The trans-boundary analysis is clear and frightening in its implications. It provides strong support to the case for the project to be conducted.

I reiterate that these comments are made in some haste, I hope that they are helpful to you in progressing the project to implementation. Please do not hesitate to contact me if you require further information.

Yours sincerely

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