

Report on the transfer of post-mining assets in Silesia Voivodeship

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List of abbreviations

Abbreviation	Name/term
JTF	Just Transition Fund
GIG PIB	Central Mining Institute State Research Institute
GIOŚ	Chief Inspectorate for Environmental Protection
GZM	Upper Silesian-Zagłębie Metropolis
IETU	Institute of Ecology of Industrial Areas
MPZP	Local Spatial Development Plan
JTM	Just Transition Mechanism
OPI TPP 2.0	Open Information Platform for Post-Industrial Areas
SG Reform	Secretariat-General Reform and Investment Task Force
SRK	Mine Restructuring Company Joint Stock Company
UWMSL	Marshal's Office of the Silesian Province
UOKiK	Office of Competition and Consumer Protection
WTZ	Large-scale Degraded Area

1. Introduction

The Silesian Voivodeship is the most coal-dependent region in the EU, where the process of closing mines has been ongoing since the early 1990s. Over the last 35 years, the number of hard coal mines in the region has fallen from 70 to 17. During this period, numerous revitalisation, reclamation, and remediation projects have been carried out; however, approximately 3,000 hectares of post-mining assets are still managed by the Company for Restructuring of Mines (Spółka Restrukturyzacja Kopalń SA) ([SRK, 2025](#)).

Spółka Restrukturyzacji Kopalń SA (SRK) is a State Treasury company established in 2000 to manage the reclamation of post-mining assets in Poland. The company operates in accordance with the Act on the Functioning of Hard Coal Mining, the Commercial Companies Code, and the Geological and Mining Law. In accordance with its updated articles of association, effective from 15 December 2023, SRK is responsible, among other things, for: 1) managing the liquidation and decommissioning of inactive mining facilities; 2) administering, selling or reusing assets from closed mines for new economic purposes; 3) preventing environmental hazards in post-mining areas, including water hazards, and conducting reclamation and revitalisation; 4) handling compensation and other liabilities towards former

mining employees and 5) taking over the rights and obligations resulting from administrative decisions related to transferred assets ([SRK, 2023](#)).

As part of its tasks, SRK implements projects related to the transformation of post-mining areas, including those financed by the Just Transition Fund (JTF). These include, among others, the [Katowicki Hub Gamingowo-Technologiczny](#), a modern innovation district focused on game development, digital education, and emerging technologies located on the site of the former Wieczorek coal mine in Katowice (10 ha transferred to the city, project, co-financing of PLN 309 million). Another example is [Kazimierz OdNowa](#) in Sosnowiec, a post-industrial transformation zone focused on environmental restoration, community revitalisation, and sustainable urban development located on the site of the former Kazimierz-Juliusz coal mine. The project was possible thanks to the co-financing of over PLN 70 million, with the possibility of transferring an additional 40 ha of the post-mining areas.¹ SRK participates in initiatives related to the transformation of the post-mining assets, including the White Paper on Transformation, the publication of the "Pact for Clean Industry" and the Regional Observatory of the Transformation Process 2.0 project. Between January and June 2025, the company issued over 20 announcements related to the topic of transformation.

An analysis of the public debate reveals criticism of some of SRK's actions regarding the transfer of post-mining land to local governments or private investors. The main allegations relate to a lack of transparency, sluggishness, or inconsistency in the development of the land sold, which does not align with local planning objectives. The allegations also concern the focus on "attempts to maintain its administration by selling part of this land" instead of revitalising the areas it manages. Another critical opinion points out that the SRK sold land without considering the risks this could entail, such as the use of land purchased by private entities to create illegal waste dumps instead of utilising it for alternative economic purposes and job creation. SRK is also criticised for using only a very limited range of its capabilities to transfer land to local municipalities for public use. ([Ślązaq.pl, 2023](#); [Widera-Cichoń, 2023](#))

In response to criticism, SRK points out that the scale of the challenge and limitation in resources are the main reasons for the lengthy processes. Firstly, SRK emphasises that it operates in accordance with legal regulations and cannot transfer land before clarifying its ownership status and conducting environmental assessments. Contaminated or technically degraded areas require complex and often lengthy remediation processes. The company also points to its limited number of employees and funds, which makes it impossible to process all transfers simultaneously. SRK stresses that to expedite the transfer of post-mining areas, Silesian municipalities must adopt a proactive and cooperative approach by submitting specific plans for land reuse and, where possible, co-financing remediation or assuming partial responsibility for the land. SRK also points out that recent legal changes, in particular the 2023 Act on Large Degraded Areas, open up new opportunities for cooperation through special joint ventures and simplified procedures.

To support these claims, SRK drew attention to the publicly available information about its resources. Its website, for example, includes a summary of the company's core activities, e.g. information on its real estate resources. However, this data is provided selectively, without

¹ In addition, in Pszów, in the building of the former Anna mine, a municipal library, a Social Welfare Centre and an Educational Facility Service Centre were established; to date, nearly 10 hectares have been transferred to the municipality, with another 11.5 hectares planned. In Ruda Śląska, SRK transferred the historic Franciszek shaft complex, which houses the Local Tradition Centre and is planned to be converted into municipal housing. Post-mining areas and facilities have also been transferred in Bytom (the Rozbark coal mine – theatre and sports centre), Rybnik (historic Ignacy mine) and Czeladź (Saturn Museum, gallery, social services centre and media library).

comprehensive information on the process of acquiring and disposing of subsequent assets in the company's history. There is also no possibility of locating the assets and checking which specific municipalities were covered by SRK's activities.² The same applies to information concerning environmental activities and HR-related issues, shared also through its website, with information about programmes related to the [restructuring and retraining of mining personnel](#). This information is available only in an ad hoc manner, rather than systematically.

A separate issue in SRK's activities is the transfer of post-mining areas to municipalities through donations. Similar to information on the sale of post-mining assets (land, buildings, and structures) and activities related to the transformation of the region, this information is published through entries on the website and via social media (e.g., Facebook and LinkedIn). These activities usually result in media publications based on press releases sent by the company to various editorial offices. However, there is currently no form, regulation or manual governing this process. The exact procedure and criteria for submitting, evaluating and deciding on such applications are unknown.³ Importantly, the amendment to the law on hard coal mining currently under consideration proposes to abolish the obligation of SRK and the recipient entity to give their consent in the process of transferring post-mining land. Additionally, it is proposed to introduce monitoring and control of the post-mining property transfer process. The competent minister (currently the Minister of State Assets) will be required to keep records of transferred properties and to report periodically on the status and effectiveness of their development. Although the adoption of the proposed changes may contribute to improving the supervision and effectiveness of the process, enabling corrective action to be taken in the event of irregularities, it will not automatically ensure greater transparency of the process.

According to recent statements, SRK plans to increase the current pace of transferring post-mining land. By the end of 2025, the company plans to transfer approximately 200 hectares, or nearly 7% of its 3,000-hectare post-mining areas, to municipalities for public use. The company declares that this exceeds the total area transferred to municipalities over the last decade. The company has also announced that it will become even more involved in the process of just transition in Poland. ([Nettq.pl, 2024](#))

The faster pace of transferring post-mining areas also coincides with regulatory changes aimed at ending the current practice of transferring closed mine areas to SRK. Under the amendment to the Geological Law adopted in 2024, the assets of hard coal mines that were closed after 31 December 2023 will no longer be transferred to SRK. However, SRK will continue to be responsible for managing its post-mining assets.

2. Methodology

To gather general knowledge, we first conducted a literature review and carried out in-depth interviews with key stakeholders in the region to identify the key challenges hindering the rapid transfer of post-mining areas in the Silesian Voivodeship. To deepen our analysis, we then conducted a survey among 64 municipalities designated as Strategic Intervention Areas in the

² During the regional consultation process, two stakeholders pointed out that it would be useful for this report to present the exact area and location of the land currently owned by SRK. However, due to the lack of such data, this information was not included in the report.

³ The current procedure for transferring post-mining areas to municipalities as a donation is based on the provisions of the Real Estate Management Act (i.e. Journal of Laws 2025, item 497), the Civil Code, the Act on the Functioning of Hard Coal Mining (Journal of Laws 2023, item 540), and the Act on Large-Area Degraded Areas (Journal of Laws 2023, item 1407), as well as the SRK Statute.

Silesian Voivodeship Development Strategy "Silesia 2030", asking six questions about key challenges in post-mining areas (Appendix 6). The aim of the survey was to identify municipalities with post-mining areas where preliminary challenges had been identified and to gather information on other potential problems and needs. The survey was conducted via the LimeSurvey platform and was available from December 18, 2024, to January 10, 2025.

The survey consisted of six questions designed to identify municipalities with post-mining areas managed by SRK or other problematic post-mining areas. It included both closed and open-ended questions.

Of the 64 municipalities contacted, 25 completed the survey, identifying key problematic post-industrial areas. Some of the municipalities that did not respond to the survey indicated that they had no post-industrial areas. Of the 25 completed surveys, 12 municipalities identified post-industrial areas managed by SRK or other active mining areas and expressed their willingness to cooperate in this project. Detailed survey results are provided in Appendix 1.

Based on the responses and an expert seminar, we selected five municipalities – Bytom, Czeladź, Jastrzębie-Zdrój, Miedźna and Sosnowiec – using three main evaluation criteria, including the size and location of the municipality, as well as its economic situation. The selected municipalities are thus diverse. They are located in different subregions of the Silesian Province. Their population sizes range from 16,000 (Miedźna) to 174,000 (Sosnowiec) inhabitants. Mining activity in these five municipalities is at various stages – while the last mine in Sosnowiec was closed in 2015, in Jastrzębie-Zdrój, coal mining could continue until 2049, according to the latest public version of the social agreement.

In the third step, based on the survey results, we conducted five in-depth interviews with representatives of the five selected municipalities to address further information gaps and develop a more comprehensive assessment of their challenges. After the interviews, we also conducted five workshops in the municipalities, with the participation of a wider group of municipal representatives (in some cases, including representatives from municipal companies, local government organisations, the Marshal's Office of the Silesian Province, and SRK) to present, discuss, and supplement the information collected.

The final result of the work is five local action plans, one for each of the selected post-mining areas. Each of the action plans consists of three elements: characteristics of the area concluded with SWOT analysis, data on the land use plan (including a list of potential partners and sources of financing), and a list of specific measures to implement (including milestones). The action plans reflect the specific challenges and diverse characteristics of the analysed post-mining areas. All five plans are included as annexes to this report for detailed reference.

3. SWOT analysis for five Silesian municipalities

Each of the analysed post-mining areas placed in Bytom, Czeladź, Jastrzębie-Zdrój, Miedźna and Sosnowiec has its own set of characteristics – strengths, weaknesses, opportunities and threats, making each one a complex and unique case. None of the areas is yet the subject of a specific plan or strategy. All areas have a complex ownership structure, as they are partly owned by SRK, municipalities, and private owners. The exception is the municipality of Sosnowiec, which is implementing the Kazimierz OdNowa project, covering part of the analysed area (3.5 ha) owned by the municipality and aimed at creating new social, business, scientific and historical functions. The content of the following subsections is further elaborated in the appendices.

3.1. Bytom

The analysed post-mining area No. 121, according to the OPI TPP 2.0 database⁴, occupies an area of 53.2 ha. The area contains spoil tips and heaps, as well as critical infrastructure in the form of municipal sewage pipelines. Thermal processes are occurring in the central part of the spoil tip. The area is characterised by a complex ownership structure that has changed over time (currently, only 1% of the area belongs to SRK). Industrial activity is carried out in the vicinity of the site. The municipality ultimately plans to use the site for economic activity. The site potentially meets the criteria for the creation of large-scale degraded areas (WTZ), where measures to improve the environmental state are necessary.

Strengths:

- good access to road infrastructure and public transport
- favourable location near industrial and commercial areas
- size of the area (over 40 ha), which could potentially (with appropriate regulatory changes) enable the removal of waste from part of the property through internal relocation within the facility
- isolation from residential areas

Weaknesses:

- complex ownership structure
- potential contamination of the area with hazardous waste (post-smelting, other)
- thermal processes at the post-mining waste dump located in this area
- waste heap from flotation related to the activities of metal ore mining and processing plants: Nowy Dwór and Orzeł Biały
- route of the pressure pipeline discharging municipal sewage to the treatment plant, which is critical infrastructure and a restriction on land use
- insufficient load-bearing capacity of the ground for the construction of foundations for buildings (production and logistics halls)

Opportunities:

- classification of the area as a large-scale degraded area (WTZ) by entering it in the register of the Chief Inspectorate for Environmental Protection
- availability of regional funds for the transformation of post-mining areas
- partially good preliminary environmental characteristics of some parts of the area. Scientific research on the environment was conducted on the site by the Silesian University of Technology, the University of Silesia, and the Warsaw University of Technology. Geodetic surveys were also carried out by potential investors and in connection with administrative work related to the illegal storage of municipal waste on a part of the site- establishing cooperation with a group of stakeholders (municipal companies, an energy company and a company associating companies from the mining, metallurgical, energy and logistics sectors) interested in the development of the facility and giving it new functions

⁴ <https://www.opi-tpp.pl/home>

Threats:

- lack of cooperation with private owners who acquired some parts of the site after 1990
- high costs of possible waste and contaminated soil removal, including an estimated cost of PLN 480 million for the relocation and securing of 1.5 million m³ of waste deposited on land owned by the municipality and subject to ongoing administrative proceedings
- restrictions on assigning new functions due to soil contamination and insufficient load-bearing capacity of the soil

3.2. Czeladź

The analysed post-mining area is combines two areas described in the OPI TPP 2.0 online tool as 304 in Czeladź and the neighbouring area 305 in Sosnowiec. The area is distinguished by its location on the border of two municipalities, its partial recreational use (an existing cycle path runs through the area), and its proximity to post-industrial areas that have been converted into cultural heritage sites. A significant problem with the area is the lack of a clear development vision, as well as the pressure from developers, which is evident in the development of neighbouring areas.

Strengths:

- location within a residential estate
- location in the vicinity of historic buildings and green areas
- existing vegetation

Weaknesses:

- lack of a coherent concept developed for the site
- ownership structure
- location on the border between two municipalities
- lack of development initiatives

Opportunities:

- mechanism for transferring land from SRK to municipalities
- construction in the immediate vicinity of the GZM expressway
- availability of funds for the revitalisation of post-industrial areas and climate change adaptation measures
- establishing local green area protection plans

Threats:

- pressure from developers
- lack of agreement between municipalities
- uncontrolled sale of land parcels
- past incidents of self-heating of the heap, which may recur

3.3. Jastrzębie-Zdrój

Post-mining areas 350 in Jastrzębie-Zdrój and 351 in Mszana in the OPI TPP 2.0 online tool. The area is characterised by a complex ownership structure, an undefined quality status and a lack of specific functional zones for future development. The area is distinguished by its proximity to the state border, which is both an advantage and a burden in terms of foreign market competitiveness, as well as social acceptance of investments involving industrial activity. In May 2025 (after completion of the analytical work carried out as part of this project), an agreement was concluded between SRK and KSSE for the joint development of 500 hectares of post-mining land, which will be included in SRK's sales offer by the end of 2025.

Strengths:

- large area
- location within the mining pillar - low risk of mining and geological hazards
- good transport links, especially after completion of the road project
- distance from residential buildings and public acceptance of industrial activity in the area
- the Local Spatial Development Plan developed
- access to infrastructure networks
- openness to cooperation between the municipalities of Jastrzębie-Zdrój and Mszana

Weaknesses:

- lack of a coherent concept developed for the area
- fragmentation of plots and ownership structure
- possibility of further divisions after the construction of a new transport system
- lack of an established working group for the area with a specific leader
- lack of an inventory of underground utilities
- no specific future for the shaft towers
- low level of entrepreneurship among residents
- better working and business conditions in the Czechia

Opportunities:

- construction of a new transport system
- availability of funds for transformation activities
- inter-municipal agreement

Threats:

- depopulation of the city
- uncontrolled sale of part of the land

3.4 Miedźna

The analysed post-mining area 307 in the OPI TPP 2.0 online tool occupies the area of 62,6 ha. The characteristic features of the area, which strongly distinguish it from others, include its location in a municipality situated on the periphery of the heavily urbanised and industrialised areas of the Silesian Province. Relatively attractive landscape and positive demographic and migration trends result in a lack of public acceptance for investments considered burdensome to the surrounding area. The development of the area will require adaptation to projects implemented in this area related to both industrial activity and municipal services.

Strengths:

- large area
- location within the mining pillar - low risk of mining and geological hazards
- accessibility of the area, especially after the commissioning of the S1 route section
- distance from residential buildings
- accessibility to infrastructure networks

Weaknesses:

- lack of a coherent concept for the area
- fragmentation of plots and ownership structure
- no established working group for the area with a designated leader
- no inventory of underground infrastructure
- public reluctance to locate burdensome investments
- poorly developed public participation process

Opportunities:

- construction of a new transport system
- availability of funds for transformation activities
- favourable demographic conditions

Threats:

- social conflicts
- uncontrolled sale of parts of the area

3.5 Sosnowiec

The analysed post-mining area no. 298, according to the OPI TPP 2.0 database, is located in the former Kazimierz Juliusz mine. The area covers 23.5 ha and is located in Sosnowiec in the Kazimierz Górniczy district. Most of the area belongs to SRK. A 3.5 ha section of the area has been transferred to the municipality for public purposes as part of the Kazimierz OdNowa project. The municipal authorities are considering the development of a residential function

but are also open to introducing urban greenery or developing ecosystem services, including the potential for recreational or industrial uses, while taking into account the limitations resulting from the proximity of public and residential buildings.

Strengths:

- favourable connection to road, rail and public transport infrastructure
- high investment attractiveness confirmed by the implementation of the Kazimierz OdNowa project on part of the site (3.5 ha)
- uncomplicated ownership structure of the area
- the presence of vegetation created naturally and by human intervention (to a lesser extent)
- such as trees and shrubs - which can support future development for housing, services and recreational purposes
- favourable location in the vicinity of residential buildings (north-eastern side), allowing for residential use

Weaknesses:

- potential soil contamination
- vegetation growth, including the potential presence of invasive species
- restrictions related to Mortimer's Ditch – (flooding, water receding)

Opportunities:

- positive attitude of SRK towards transferring the land to the municipality (letter of intent signed)
- the Municipality's extensive experience in taking over and developing post-mining areas, implementation of the "Kazimierz OdNowa" project, which will result in the socio-economic revitalisation of the area
- proximity of the area to be reclaimed to the forest (on the southern side) – the forest will complement the ecosystem services in the event of their creation in the analysed area, as well as in the event of residential development
- the possibility of using the mine water settling pond located in the analysed area for retention purposes - drainage of the area
- possibility of using part of the area for compensatory tree planting in the city

Threats:

- unclear legal provisions regarding the transfer of post-mining areas to municipalities for public purposes
- lack of documented knowledge about the condition of the area, including the lack of geochemical studies, lack of data on land subsidence and hydrological conditions, as well as lack of funds to carry out a proper characterisation of the area
- lack of documents confirming the state of contamination of the land
- lack of inventory and characterisation of the condition of greenery

- poor understanding of the degree of contamination of the site and the exact course of the Mortimer Ditch

Based on the inputs from desk research, interviews, workshops and the SWOT analysis, the main challenges facing the five municipalities seem to be:

Environmental and technical problems: The areas are often contaminated or have insufficient testing, or there is a risk of contamination (no tests have been conducted), and information on infrastructure (e.g., drainage, pipelines, shafts) is incomplete, which makes it difficult to plan their management.

High remediation and revitalisation costs: Restoring these areas to use requires significant resources to be allocated to the municipal budget for these projects (if the municipality is to cover them) or to apply for various types of funding. In particular, it is difficult to obtain instruments from the second and third pillars of the Just Transition Mechanism (the funds included in this pillar are not non-repayable grants, as is the case with the JTF, and at the same time, preparing an appropriate application is more demanding). The amount of costs to be incurred depends on the condition of the land, its contamination and its intended function. These figures can vary greatly. For example, the cost of reclamation of a slag heap in Tarnów was approximately PLN 100,000 per hectare, and in Ruda Śląska, approximately PLN 750,000 per hectare. In the case of the most heavily polluted areas, the literature indicates that the costs can reach several million zlotys.

Lack of local coordination structures: Municipalities often lack designated teams responsible for post-mining areas or project leaders, which hinders interdepartmental and intermunicipal processes. They identify a lack of external support in the preparation of a project aimed at managing post-mining areas.

Weak public participation and local tensions: Some residents are concerned about new investments (especially industrial ones), and there is a lack of trust and active dialogue on development directions. Not all municipalities are prepared or have sufficient experience and human resources to conduct quality dialogue with their citizens.

4. Conclusions and recommendations:

Conclusion 1: The current role of SRK in the just transition process is defined in the Act on the Functioning of Hard Coal Mining and in the company's legal statute, which puts profit as the primary goal of its activities related to post-mining area management. Social and local interests are not included in the SRK's list of tasks, except for the function of creating jobs, which, however, is limited to the company's economic activity. Despite its declared role as a facilitator in just transition processes, SRK has no legal basis to act in accordance with the logic of this process, which takes into account, among other things, the interests of local communities.

Recommendation 1: Regardless of the legislative work currently underway, the **Ministry of State Assets** should amend the Act on the Functioning of Hard Coal Mining and change SRK's legal statute to expand the company's statutory objectives, enabling it to conduct its

activities taking into account the interests of local communities, including the local government development plans.⁵

Conclusion 2: SRK does not provide full data on its properties (e.g. total area, location).⁶ SRK provides extensive and comprehensive data on properties offered for sale (in PDF files), but does not publish the source data, allowing for the inclusion of areas that have already been sold or areas that are not yet prepared for sale.

Recommendation 2: **SRK** should make all relevant data available in a user-friendly format, including, for example, the number, area, and location of all assets in its possession, as well as details of procedures for donating post-mining land. From a procedural standpoint, it is essential to define the criteria used by SRK in its decision-making and the weighting of each criterion. Data on all post-mining areas managed by SRK should be available on the company's website and updated at least annually.

Conclusion 3: The information provided by SRK regarding the degree of environmental degradation is not entirely convincing to potential buyers or landowners. In fact, there have been cases where potential buyers have refrained from transactions after conducting their own environmental analysis of the land, which led to the discovery of contamination in the area. For municipalities interested in acquiring land from SRK, this raises additional concerns about whether spending public money on additional decontamination could be considered mismanagement of public funds.

Recommendation 3: The **Ministry of State Assets** and the **Ministry of Climate and Environment** should engage in dialogue to clarify the legal responsibility for potential contamination of post-mining areas discovered after their purchase from SRK. In addition, it is recommended that municipalities be supported in obtaining public funds to finance land surveys prior to their acquisition from SRK.

Conclusion 4: SRK does not fully consider the credibility of potential buyers when deciding about the sale of post-mining areas. According to some stakeholders, this opens up the possibility for illegal activities, such as the creation of illegal landfills.

Recommendation 4: Municipalities and SRK should introduce a consultation process for managing post-mining land. In this process, SRK would request a non-binding opinion from municipalities before selling a specific area. Municipalities would issue such an opinion where there are concerns about potential buyers or the purpose of the investment. This change will require the involvement of the **Ministry of State Assets**.

Conclusion 5: In its current practice of concluding agreements for the transfer of post-mining areas to municipalities for public purposes, SRK has sought to include a clause stipulating that these areas cannot be used for economic purposes for a period of ten years. From the perspective of municipalities, however, this hinders the development potential of these areas

⁵ One model worth considering is the division of the German company RAG, whose task is to provide long-term financing for mining damage, post-mining land reclamation and support for transformation, taking into account the development of education, innovation and culture.

⁶ Part of this activity is covered by the OPI TPP 2.0 online tool.

and slows down the transfer of post-mining assets to municipalities. In addition, these areas are transferred to municipalities for perpetual usufruct, not ownership, which, for many private investors, is a factor blocking investment.

Recommendation 5: SRK should abandon the practice of blocking the possibility of using post-mining areas for economic purposes for a period of ten years or shorten this period to provide municipalities with reasonable planning prospects. In addition, perpetual usufruct should be replaced with ownership.

Conclusion 6: Article 23 of the Act of 7 September 2007 on the Functioning of Hard Coal Mining stipulates that municipalities applying for the transfer of post-mining areas managed by SRK in the form of donation are responsible for determining the public purpose of the future development of these areas. According to the position of the Office of Competition and Consumer Protection,⁷ in light of Article 6 of the Act on Real Estate Management, housing construction – including that carried out by municipalities and municipal companies – does not constitute a public purpose, and therefore the land transferred to municipalities by SRK cannot be used for such investments. However, the interpretation of the Local Government Act may indicate that such investments can be considered to meet the criteria for public purposes. At the same time, European law⁸ and practice in Germany⁹, the Netherlands¹⁰, and Spain¹¹ suggest that, with appropriate safeguards (e.g., the sale of flats at below-market value or to low-income persons), the public purpose is fulfilled.

Recommendation 6: A clear interpretation of the law by the competent national authorities is needed. Alternatively, in the process of amending the Mining Act, the list of categories meeting the public purpose criteria includes municipal enterprises responsible for housing.

Conclusion 7: The scale and level of contamination of some post-mining areas indicate that the Act on Large-Scale Degraded Areas could be a potential solution for some of them. Due to their fragmentation, the lower limit of 50 ha defined for the area may be a barrier in the case of post-mining areas in Silesian municipalities. At the same time, the procedure for qualifying such areas as large-scale degraded areas has not yet been applied by any other municipality in Poland apart from the first five municipalities included in the Act, which constitutes a significant barrier for municipalities interested in this solution.

⁷ <https://legislacja.rcl.gov.pl/docs//2/12393102/13104115/13104118/dokument703105.pdf>

⁸ Court of Justice of the European Union. (2003). *Altmark Trans GmbH and Regierungspräsidium Magdeburg v Nahverkehrsgesellschaft Altmark GmbH* (C-280/00, ECLI:EU:C:2003:415); and European Commission. (2009). *State aid N 209/2009 – Netherlands: The existing and future financing system of social housing corporations in the Netherlands* (C(2009)9963).

⁹ OECD. (2020, October). *Social housing: A key part of past and future housing policy*. OECD Policy Brief on Affordable Housing. OECD Publishing.

https://www.oecd.org/content/dam/oecd/en/publications/reports/2020/10/social-housing-a-key-part-of-past-and-future-housing-policy_ef96d6d9/5b54f96b-en.pdf

¹⁰ Aedes (2013). *Dutch Social Housing in a Nutshell*. The Hague / Brussels: Aedes. Retrieved from <https://www.iut.nu/wp-content/uploads/2017/03/Dutch-Soical-Housing-in-a-Nutshell.pdf>

¹¹ Ministerio para la Transición Ecológica y el Reto Demográfico. (2022). *Spain: 4 years towards a just energy transition*. Institute for Just Transition (ITJ), Government of Spain.

https://www.transicionjusta.gob.es/content/dam/itj/files-1/Documents/Publicaciones%20ES%20y%20EN/Spain_4%20years%20towards%20a%20just%20energy%20transition.pdf

Recommendation 7: A dialogue should be initiated between Silesian municipalities to assess interest in applying the Act on Large-Scale Degraded Areas. If interest is confirmed, an informal working group should be established with the participation of municipalities, GZM, WFOŚiGW, and the **Fundusz Transformacji Województwa Śląskiego S.A.** (Silesian Province Transformation Fund), operating under the auspices of **UMWSL**. These entities should assess the suitability of the Act to the characteristics of post-mining areas (including, among other things, the frequent fragmentation of ownership of post-mining areas), the possible benefits of classifying an area as a WTZ, and any doubts regarding the procedure described in the Act. At the same time, the Ministry of Climate and Environment should undertake activities promoting this statutory solution, such as workshops or a handbook, for municipalities.

Conclusion 8: Municipalities report a need for systemic support from external specialised organisations to help them navigate the difficult administrative procedures involved in managing post-mining areas and assessing financing mechanisms. They point to a lack of technical assistance in the Just Transition Mechanism (JTF and also Pillar II) and insufficient justification from the Marshal's Office in the case of negative assessments of grant applications. This makes it difficult for municipalities to learn and improve their effectiveness in obtaining external funding.

Recommendation 8: Based on an analysis of rejected applications for co-financing under the JTF, the **UMWSL** should prepare a study describing the key errors made in applications and providing guidance on how to avoid them. Additionally, efforts should continue on developing the possibility of establishing an external operator for post-mining areas and promoting this solution among municipalities.

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Legal acts

- Act of 7 September 2007 on the functioning of hard coal mining ([link](#))
- Act of 21 August 1997 on real estate management ([link](#))
- Act of 16 June 2023 on large-scale degraded areas ([link](#))
- Act of 15 September 2000 Commercial Companies Code ([link](#))
- Act of 9 June 2011 Geological and Mining Law ([link](#))

Annex 1. Action plan – Bytom

1. Characteristics of the post mining area

Number of the site in the OPI-TPP 2.0	121
Location (municipality, county)	Bytom, a city with county rights, area 69.44 km ² , population: 154,978 inhabitants (as of 2023)
Area of the site	53,2 ha (OPI TPP 2.0), 44,27ha according to GIS (Map 1)
Type of post-mining area	Heap, landfill site
Character of the area	A complex type of transformed terrain resulting from the storage of mining and industrial waste and activities carried out in the area – a “Martian” landscape. (Map 2).
Current owner(s) of the land	Variable and complex ownership structure: owned by the municipality, municipal companies, the municipality of Radzionków, private entities, and, on a very small scale, the Company for Restructuring of Mines (SRK).
Occurrence of flood hazards	There is no flood risk on the site.
Transport links and accessibility of the area	The area is well connected to road infrastructure and public transport. The distance from the A1 motorway junction is less than 0.2 km. Public transport stop within (Map 3). The area is directly accessible from Wawrzyńca Hajdy Street.
Geology and groundwater	Quaternary formations in the form of sand, gravel, silty clay, and gravelly sand; Early Jurassic formations in the form of gravelly sand and clay; and Middle Triassic formations in the form of dolomite. The northern part of the area is located within the main groundwater reservoir No. 329. (Map 4, Map 5).
Land use in municipal plans	Municipal spatial development plan MPZP “Dąbrowa Miejska” resolution No. LXI/788/22 of the City Council in Bytom of May 30, 2022: production areas, service areas, green areas (Map 6 Błąd! Nie można odnaleźć źródła odwołania.).
Current function (site inspection or other data source)	Dumps and slag heaps (according to OPI TPP 2.0)
Information on the area being covered by the new Polish strategic spatial planning document	The municipality began developing the new Polish strategic spatial planning document on October 28, 2024, but has not yet adopted it.
Facilities located on the premises	Dumps and heaps (according to OPI TPP 2.0), critical infrastructure – sewage pressure pipeline
Activities currently conducted on the premises	No activity is currently being conducted on the premises.
Investment potential	After cleanup and resolution of the waste and soil contamination issues, the site is attractive for further development for production/economic purposes. The limitation is the proximity of attractive areas that are not burdened by waste and unfavourable geotechnical parameters of the soil.

SWOT

Strengths:

- Good connections to road infrastructure and public transport.
- Favourable location in the vicinity of industrial and service buildings.
- Size of the area (over 40 ha): possibility of relocating deposited waste within this property
- The area is isolated from residential buildings

Weaknesses:

- Complex ownership structure
- Potential contamination of the site with hazardous waste (steel mill waste, other)
- Thermal processes at the 4A dump
- Dump for flotation materials related to the operation of the Nowy Dwór and Orzeł Biały plants
- The route of the pressure pipeline carrying municipal sewage to the treatment plant, which constitutes critical infrastructure and some restrictions on future land use of the site
- Insufficient load-bearing capacity of the land for the construction of buildings (production halls, logistics halls, warehouses) in most areas

Opportunities:

- Classification of the area as a Large-scale Degraded Area (WTZ) and entry of this site into the Chief Inspector of Environmental Protection register
- Availability of funds for the transformation of post-mining areas.
- Inclusion in the Waste Act of December 14, 2012, of a provision allowing waste to be secured at the place of storage.
- Scientific research on the environment was conducted on the site by the Silesian University of Technology, the University of Silesia, and the Warsaw University of Technology. In addition, soil testing was carried out by potential investors, as well as soil testing related to administrative procedures concerning part of the site.
- Establishment of cooperation with stakeholders (listed below) in order to develop ways of developing the site and giving it new functions.

Threats:

- Lack of cooperation with entities that acquired the land after 1990
- High costs of possible removal of waste and contaminated soil, including an estimated cost of PLN 480 million for the relocation and securing of 1.5 million m³ of waste deposited on land currently owned by the municipality, which is the subject of ongoing administrative proceedings.
- Restrictions on assigning new functions due to soil contamination and insufficient soil bearing capacity. Residential functions are excluded.

2. Site development plan

Planned land use functions	On a fragment of the 121 site (15 ha) belonging to the municipality and municipal companies: construction of 12 MW photovoltaic panels. On the remaining part of the site currently belongs to various entities: development of the site through the construction of a photovoltaic farm. Relocation of waste in part of the area. Other proposals for the site development concern the use of a burnt-out slag heap for thermal energy storage. Furthermore, construction (e.g., light logistics halls) can also be considered, but it would require high costs associated with piling up to 8 m. The planned construction of a photovoltaic farm may be a permanent or temporary solution covering a period of approximately 30 years. The municipality does not rule out the possibility that after this time, other economic activities may be introduced in the analysed area.
Land development project leader/operator	Bytom City Hall, Bytom Waterworks (BW)
Planned date of the development/transformation of the site	The municipality does not specify the date of the land transformation, but indicates a 10-year period from the moment of obtaining the rights to take any action. The key issue is the resolution of the ongoing administrative procedure and the expropriation of the land for the benefit of the municipality in connection with its entry in the Chief Inspector's of Environmental Protection register of Large-scaled Degraded Areas.
Division into functional zones	Industrial zone, Green zone along the Szarlejka watercourse, Waste storage zone – only in relation to the liquidation of the current landfill site.
Project maturity	The project is at the concept stage, and formal procedures are being initiated.
Potential project partners or stakeholders	<ul style="list-style-type: none">· Bytom Waterworks Company· Energy Innovation Cluster· Tauron Innovations· Węglokoks company· Other owners of this area (Radzionków Local Government Unit, State Railway Company, commercial companies not affiliated with the Bytom Local Government Unit).
Potential land buyers (specific examples or buyer type)	City of Bytom Municipal companies (BW)

Alignment with local and regional strategies	<p>The transformation of the area for the construction of a photovoltaic farm implements the provisions of the Bytom City Development Strategy “Bytom 2030+” (2022), according to which the transformation of the city will mean a shift away from the traditional economy, including energy, based on fossil fuels, towards a sustainable, low-carbon, and efficient economy using renewable energy sources and the principles of the circular economy. In addition, activities related to the reclamation of post-mining land and the implementation of projects in this area are in line with the operational objective of the strategy: Revitalized post-mining and post-industrial areas.</p> <p>Activities related to the transformation of post-mining land in Bytom implement the objectives of the Silesian Province Development Strategy “Green Silesia” (2020) relating to the creation of a high-quality environment and space in the region through the reclamation and revitalisation of degraded areas and the development of post-industrial areas, including for economic purposes. The construction of a photovoltaic farm is an example of an investment whose implementation will meet the Strategy's objective of supporting solutions that reduce low emissions.</p>
Possible sources of financing of the area transformation	<ul style="list-style-type: none"> · European Funds for Silesia (current and future perspective), · Just Transition Fund · Silesian Province Transformation Fund · National Recovery and Resilience Plan (KPO) · Voivodeship Fund for Environmental Protection and Water Management and National Fund for Environmental Protection and Water Management · Budget of the City of Bytom.
Addressing environmental and climate aspects	<p>The construction of a photovoltaic farm will contribute to the reduction of greenhouse gas emissions by limiting the consumption of fossil fuels such as coal and natural gas. As a result, there will be a reduction in carbon dioxide (CO₂) emissions and other greenhouse gases such as nitrogen oxides (NO_x) and sulphur oxides (SO₂). The investment will be the municipality's contribution to sustainable energy development, which is beneficial not only in terms of environmental aspects but also from the point of view of combating climate change.</p>
Expected direct and indirect beneficiaries of the project	<p>The municipality of Bytom Inhabitants of the City of Bytom</p>

Good practice examples

State aid – Spain,

Spain has developed a multi-stage, multi-level governance framework that enables a just transition in post-mining regions, especially those affected by the closure of coal mines. The country combines national and EU instruments to support the affected areas, while ensuring compliance with EU state aid rules.

At the heart of this approach are Just Transition Agreements (JTAs) – formal agreements between the central government, regional and local authorities, and stakeholders. These agreements allow local development strategies to be tailored to the available resources—in particular from the Just Transition Fund (JTF)—and other national and EU funding sources.

According to [the analysis of Real Instituto Elcano](#) (2023), the Spanish approach is based on three interrelated mechanisms:

1. Urgent Action Plans (Planes de Acción Urgente) – covering retraining programs, early retirement, and support for local SMEs and workers in regions affected by mine closures.
2. Just Transition Agreements (JTAs) – which serve to coordinate investment planning in specific territories undergoing transition.
3. Just Transition Tenders – mechanisms for allocating access to the electricity grid for renewable energy and energy storage projects that bring specific benefits to local communities in post-mining regions.

This system is complemented by PERTE projects (Proyectos Estratégicos para la Recuperación y Transformación Económica) – strategic public-private projects supporting ecological and digital transformation. These investments are designed to comply with EU state aid rules, often following prior consultation with the European Commission and based on regional aid maps and the [GBER](#) regulation.

At the same time, Spain is also implementing social components of the transition, such as retraining, professional mobility, and local community support programs. These are often implemented outside the state aid regime, which allows for greater flexibility in their implementation.

Tarnowskie Góry Chemical Plant is one of five Large-scaled Degraded Areas (WTZ) explicitly mentioned in the Act of June 16, 2023, on large degraded areas ([Ustawa z dnia 16 czerwca 2023 r. o wielkoobszarowych terenach zdegradowanych](#)).

The company meets the four basic WTZ criteria listed in the Act.

1. Large area – at least 50 ha (although the law provides for exceptions for smaller areas of special importance).
2. Environmental degradation – the area has been degraded as a result of industrial activity, in particular mining or chemical industry.
3. Threat to human health or the environment – there is significant soil, water, or air pollution, subsidence, or fire hazards.

4. No possibility of rational use – the area cannot be used in accordance with the local plan, or its restoration to use requires extraordinary financial or technical expenditure.

Based on available sources (including the local government of the Silesian Province, the Provincial Inspectorate for Environmental Protection, and media articles), the Chemical Plant site met the above criteria due to:

- High environmental contamination – chemical waste landfill site from chemical production plants, including heavy metals and toxic organic substances (formaldehyde, phenols, chromium).
- Risk to health and life – long-term threat of groundwater contamination and infiltration into surrounding areas.
- No possibility of commercial development without prior decontamination and securing.
- Complex ownership and regulatory situation – obstacles to carrying out remediation activities without special
- Public significance of the problem – the problem has been repeatedly raised by local government, social organisations, and the media as an “ecological bomb.”

However, this company did not undergo the procedure for granting Large-scale Degraded Area status as provided for in the Act. The procedure involves: 1) Preparing documentation for the application to the provincial governor, 2) Submitting an application to the provincial governor to the Council of Ministers, 3) A regulation of the Council of Ministers allows the development of a recovery plan to begin, 4) Implementing measures using simplified procedures.

3. Action plan

Action	Milestone	Result	Responsible entity	Entities involved
1. Administrative work related to illegal waste storage (including municipal waste) that took place in the past.	Closure of administrative procedures carried out independently of the municipality	Unlocking decision-making power in relation to the area of the site	State administration	State administration, Bytom City Hall
2. Work related to solving the problem of complex ownership structure	Change of status of the area to Large-scaled Degraded Area (WTZ) and entry into the Chief Inspector's of Environmental Protection register	Expropriation of land for the benefit of the municipality	Bytom City Hall	Bytom City Hall, Chief Inspector's of Environmental Protection, Voivodeship Inspectorate for Environmental Protection
3. Work related to securing funding for research and analysis	Submission of an application/applications for research and analysis funding. 2. Granting of funds to the municipality by financing institutions.	The municipality is the administrator of funds for research and analysis.	Bytom City Hall	Bytom City Hall
4. Verification of the conditions for transforming the land in the selected direction	Conducting research and analyses (including geochemical and hydrological studies, soil bearing capacity tests, inventory and assessment of the condition of greenery).	Obtaining research and analysis results by the municipality, which form the basis for investment planning.	Bytom City Hall	Bytom City Hall, consulting firms, research units, and others
5. The process of public consultation on the proposed land use plans	Conducting public consultations, including gathering opinions, proposals, and comments from the public and institutions on the proposed land use plans.	The municipality has knowledge about the opinions of various social groups regarding the proposed land use plans.	Bytom City Hall	Bytom City Hall

6. Spatial delimitation of problems, separation of sub-areas, and prioritization of problems	1. Division of the post-mining area into sub-areas: - landfill site with waste of unknown origin (illegal) - sub-area with a tailings storage facility from zinc ore mining and processing - sub-area of a burned waste rock storage facility - sub-area of critical infrastructure. Prioritisation of identified problems	The municipality has grounds to take action in this area.	Bytom City Hall	Bytom City Hall, municipal company, Energy Innovation Cluster, Tauron Innovations, Węglokoks Company, The Company Restrukturyzacja Kopalń (SRK), The other owners of this land (several companies)
7. Development of a land use concept divided into sub-areas	Preparation of a document containing a concept for the development of problem sub-areas, taking into account the following functions: - greenery along the Szarlejka watercourse, - waste disposal site, - photovoltaic farm, - pipeline security zone	The municipality has a specific concept for separate sub-areas.	Bytom City Hall	Bytom City Hall, municipal company, Energy Innovation Cluster, Tauron Innovations, Węglokoks Company, The Company Restrukturyzacja Kopalń (SRK), The other owners of this land (several companies)
8. Carrying out work to secure the site due to environmental impacts and the planned function.	1. Protecting the area against surface runoff, 2. Protecting the area against fire, 3. Relocating the waste	Land free of waste	Municipal company, contracting companies	Bytom City Hall
9. Planning activities (related to the construction of a photovoltaic farm)	1. Analysis of financing options for activities. 2. Development of plans and identification of directions for the site transformation (e.g., remediation plan, construction conditions, functional and utility program for the investment).	The municipality has substantive basis for implementing the investment	Bytom City Hall	Bytom City Hall

10. Obtaining funding for the development/transformation of the area	Submission of an application/applications for funds for site transformation. Allocation of funds to the municipality by financing institutions.	The municipality is the administrator of funds for land development	Bytom City Hall	Bytom City Hall optionally, companies providing support in preparing grant applications, and financing institutions
11. Realisation	Implementation of individual stages of work	Acceptance of work (including construction and other works) by the municipality.	Urząd Miejski w Bytomiu	Bytom City Hall, contracting companies.

4. Sources

Strategies:

Bytom City Development Strategy "Bytom 2030+", Bytom, December 2022, Resolution LXXIII/930/23. Adoption of a resolution on the adoption of the Bytom City Development Strategy "Bytom 2030+" (R-931) [<https://www.bytom.pl/dla-mieszkanca/strategia-rozwoju-miasta-bytom-2020>]

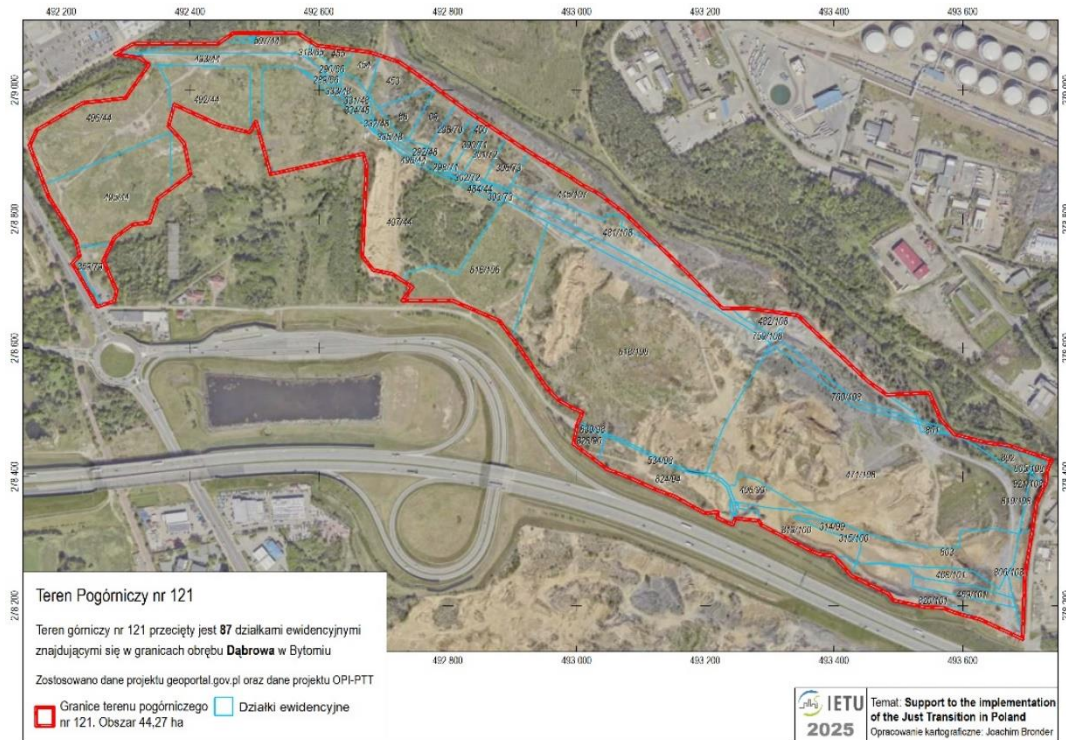
Development strategy for the Silesian Province: "Green Silesia" (2020).

Resolution of the Silesian Provincial Assembly No. VI/24/1/2020 of October 19, 2020, Katowice, October 2020 [<https://www.slaskie.pl/content/strategia-rozwoju-wojewodztwa-slaskiego-slaskie-2030>]

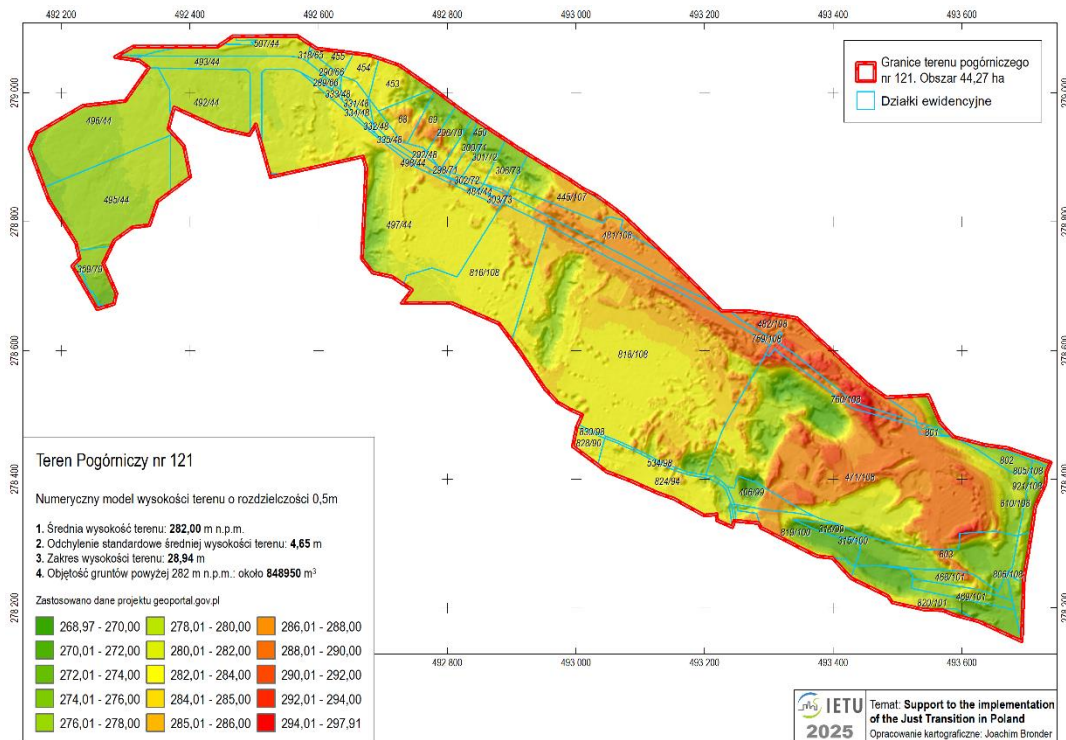
Act of Law from June 16, 2023, on large-scale degraded areas [Dz. U. 2023 poz.1719]

5. Appendices

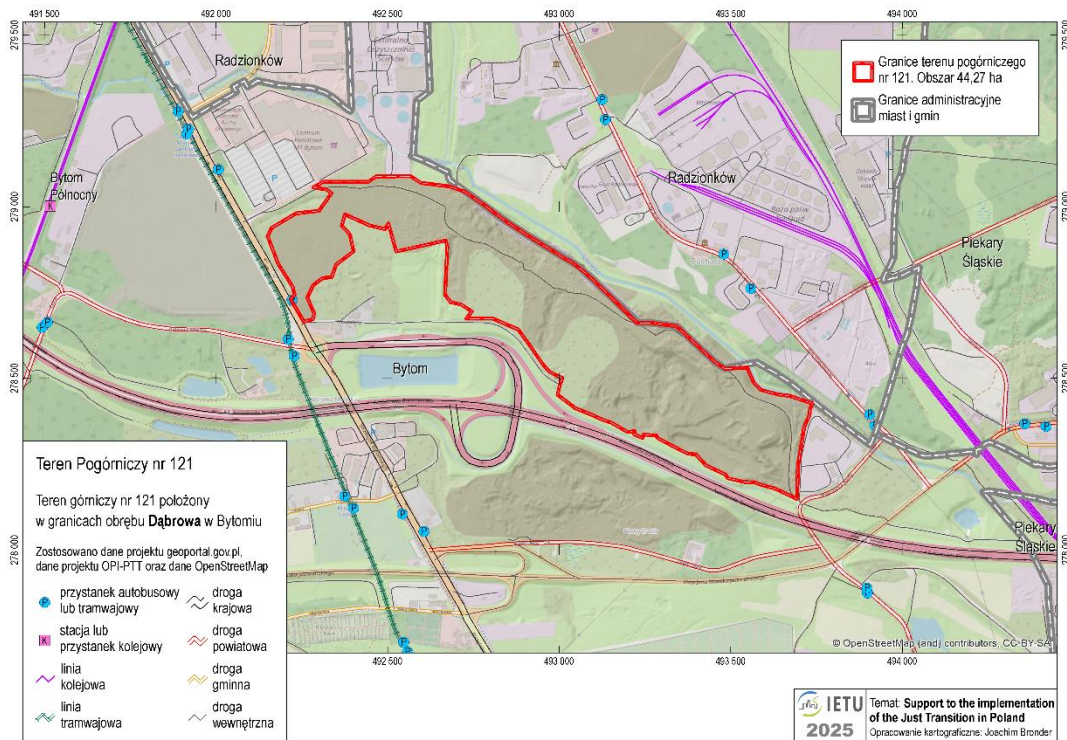
Appendix no 1: Maps



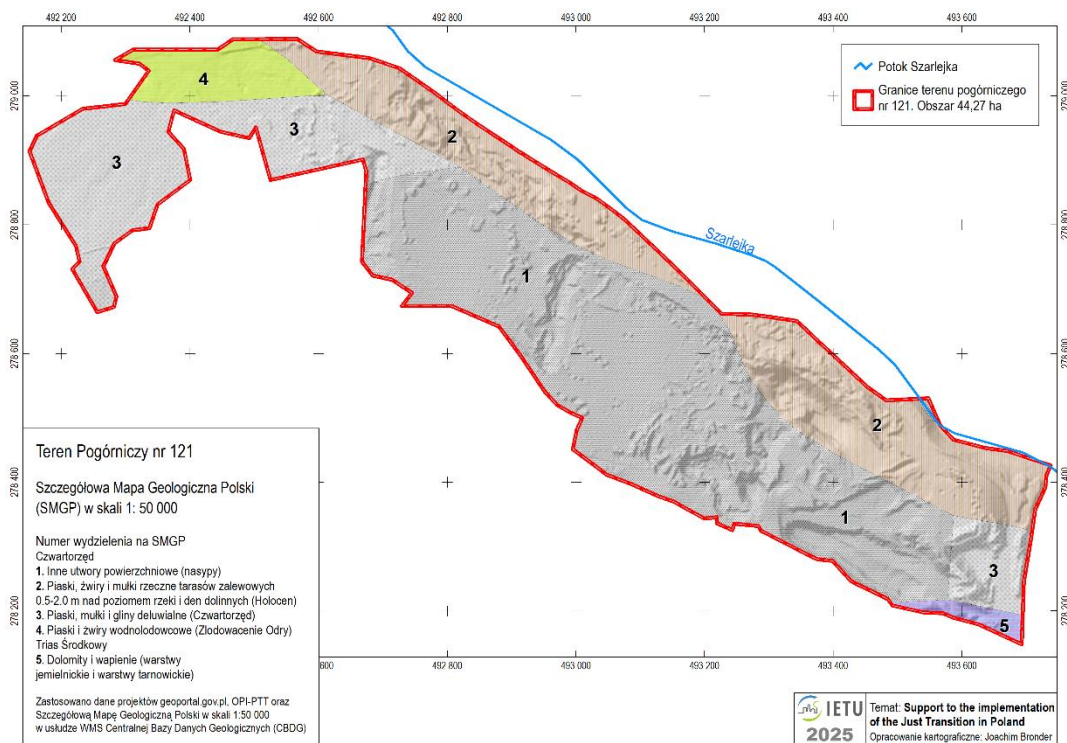
Map 1 Post-mining area No. 121: Cadastral plots



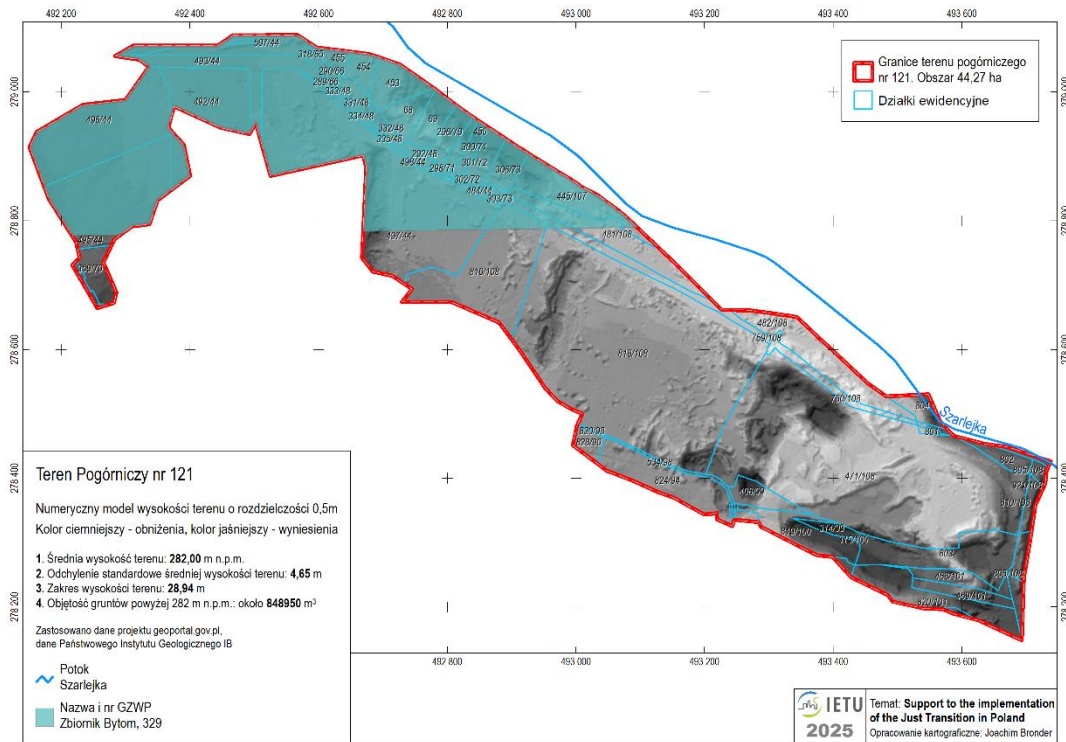
Map 2 Post-mining area No. 121: Digital elevation model



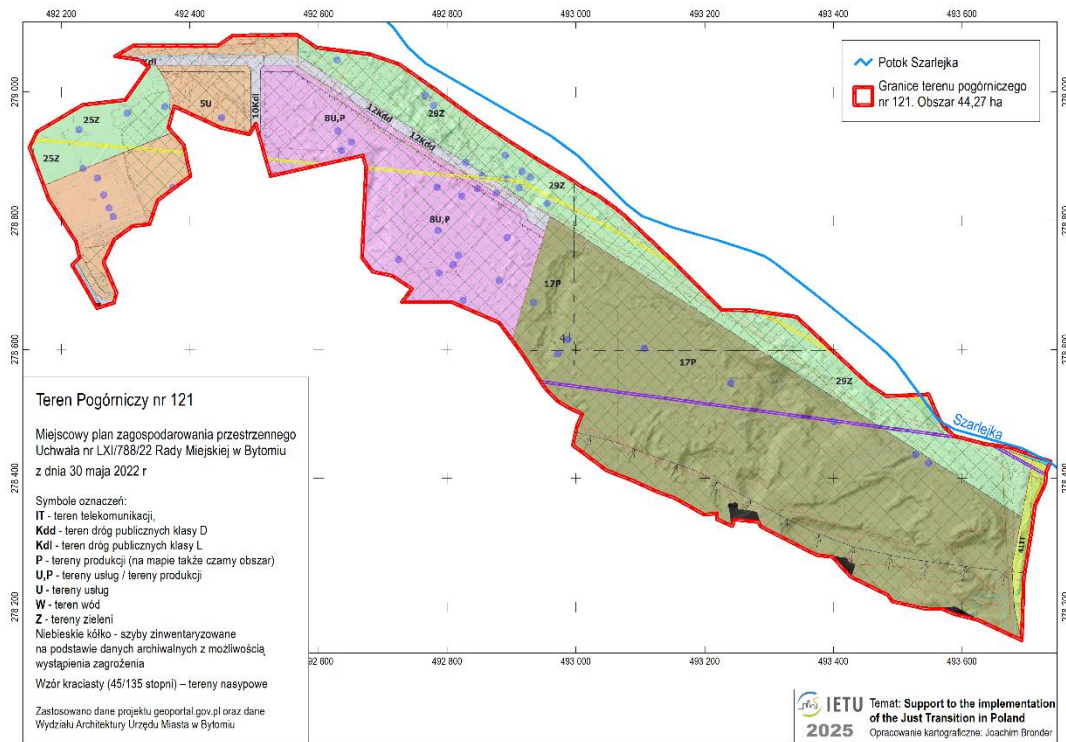
Map 3 Post-mining area No. 121: Układ komunikacyjny



Map 4 Post-mining area No. 121: Geology of the study area



Map 5 Post-mining area No. 121: Coverage of the area by the Szarlejka watercourse and the range of GZWP Reservoir No. 329



Map 6 Post-mining area No. 121: Local spatial development plan MPZP "Dąbrowa Miejska"

Annex 2. Action plan – Czeladź

1. Characteristics of the post mining area

Site number in the OPI TPP 2.0 database	304 (Czeladź) 305 (Sosnowiec)
Location (municipality/ municipalities, county)	Czeladź (Będzin County), Area: approx. 16.38 km ² , Population: 30,614 (as of 2023), Sosnowiec
Site area	12,3 ha
Type of post-mining land	Hard coal mining spoil heap – approx. 670,000 m ³
Current owner(s) of the land	State Treasury (SRK), City of Sosnowiec
Flood risk	No flood risk identified.
Site access	Access to the area is possible only from Graniczna Street in Czeladź – the final section is via an unpaved road.
Geology and groundwater	According to the Polish Geological Institute, the site is composed of anthropogenic soils, and for the vast majority of the area, building conditions are limited. No risk of groundwater-related waterlogging.
Land use in municipal plans	An LSDP (Local Spatial Development Plan) has been adopted. In Czeladź, the area is designated as unmanaged green space; in Sosnowiec, the western part is designated as buffer greenery, and the eastern part as single-family housing.
Current function (site visit or other data source)	According to the document titled “Environmental Protection Programme for the Municipality of Czeladź for 2013–2016 with the perspective for 2017–2020” (Annexe to Resolution No. XLIX/742/2013 of the Czeladź City Council of 13 May 2013), the reclamation of the “Graniczna” spoil heap was officially completed in 2005. SRK S.A. Branch Sosnowiec carried out technical and biological reclamation over 2.61 ha as part of Stage II of the works, “Reclamation of the former above-ground dump near Graniczna Street in Czeladź” – soil condition restoration – Izoling method. (The area covered by Stage II was 5.01 ha, including the Sosnowiec section.) According to the “Annexe to Stage II of the reclamation project...” and the Decision of the Będzin County Authority of 26.07.2005 and the Decision of 05.09.2005, technical reclamation was completed – a section of internal road, walking alleys and cycling paths were constructed – and biological reclamation was carried out – turfing by the Izoling method, planting of trees and shrubs. Currently, the area is overgrown with tall vegetation, is unused, and contains a large amount of waste. A cycle route runs through the area.
Information on whether the site is or will be defined in the General Plan	The draft General Plan is under preparation.
Assets located on the site	There are no buildings on the site. Heat pipelines run along the western boundary of the heap.
Current activity on the site	None
Investment potential	In its current state, the area has low investment potential. Any development for economic purposes will require tree removal,

grading, ground stabilisation, and the provision of infrastructure and access roads.

At the same time, the expanding residential development in the immediate vicinity indicates potential for such a function in the near surroundings.

The area is currently used by local residents for walking, which demonstrates its social potential and the important role it already plays in the local landscape as an open and publicly accessible space.

SWOT

Strengths:

- location within a residential area,
- proximity to heritage assets and green areas,
- existing vegetation.

Weaknesses:

- absence of a coherent concept for the site,
- ownership structure,
- location on the boundary between two municipalities,
- lack of initiatives concerning the site's development.

Opportunities:

- mechanism for transferring land from SRK to municipalities,
- preliminary, informal talks between the Municipality and SRK about this site,
- construction of the GZM cycle expressway (velostrada) in the immediate vicinity,
- availability of funds for the transformation of post-industrial areas and climate adaptation measures,
- local plans including provisions for the protection of green areas.

Threats:

- the site is officially listed for sale by SRK, which may attract investors interested in other uses – developer pressure,
- lack of agreement between municipalities,
- uncontrolled sale of land parcels,
- incidents of self-heating of the heap reported in the past.

2. Land use plan

Planned site functions	The primary form of land use – green area with an assigned recreational function.
Project leader/operator for the land development	The City of Czeladź is the lead entity engaged in the redevelopment of the area.
Planned date for site development	2030
Functional zoning	– recreational zone
Project maturity	The project is at an early stage of development. To date, there has been no consideration of redeveloping the analysed area.
Potential partners or stakeholders	<ul style="list-style-type: none">• City of Czeladź,• City of Sosnowiec,• GZM (Metropolis GZM),• SRK.

Potential buyers of the land (specific examples or types of buyer)

- City of Czeladź,
- City of Sosnowiec.

Alignment with local and regional strategies

Under the Czeladź City Development Strategy 2024–2030, the Saturn mine has been identified as a Strategic Intervention Area (SIA/OSI). Identifying an SIA within the municipality is a strategic choice that results in directing public intervention to a specific part of the city. It should be noted that the territorial scope of the SIA does not coincide with the area under consideration.

Possible sources of financing for the site

- Just Transition Fund,
- European Funds for Silesia 2021–2027,
- WFOŚiGW (Regional Fund for Environmental Protection and Water Management),
- Municipal budgets,
- Funds from Fundusz Transformacji Województwa Śląskiego S.A. (e.g., within the support area: Economic use of post-industrial, in particular post-mining areas).

Environmental and climate aspects

Given its character, the site has the potential to increase access to green areas, especially for residents of the Piaski district in Czeladź. Developing the site towards recreational use while retaining its forest character is in line with urban climate adaptation guidelines.

Expected direct and indirect beneficiaries

Direct beneficiaries will include residents of the City of Czeladź and Sosnowiec, and, if functionally connected, users of the planned GZM Cycle Expressway (Velostrada GZM).

Good practices

LUMAT project

The [LUMAT](#) project, implemented under Interreg Central Europe, aimed at sustainable management of post-industrial land in Central European cities. In Poland, a key activity was the revitalisation of the zinc spoil heap at 1 Maja Street in Ruda Śląska. The 6.5 ha heap, located virtually in the city centre, is a remnant of the Liebe–Hoffnung zinc smelter operating from the first half of the 19th century until 1925.

Revitalising the post-zinc slag heap in Ruda Śląska involved several key challenges that had to be addressed during the implementation of the LUMAT project. The most important were:

1. Heavy metal contamination

- The heap contained significant amounts of heavy metals such as zinc, lead, and cadmium, which could pose a risk to human health and the environment.
- A key issue was preventing these substances from penetrating into the soil, groundwater, and the atmosphere through dust dispersion.

Solution:

- Phytostabilisation was applied, i.e., planting the heap with specific grass species that bind heavy metals in their root systems, minimising their migration.

2. Structural stability of the heap

- The heap consisted of loosely accumulated smelting waste, making it potentially unstable and susceptible to landslides.

- There was a risk of erosion and ground subsidence after land development.

Solution:

- Reinforcing the structure by properly shaping the terrain and compacting the subsoil.
- Creating protective layers to limit erosion and dusting.

3. User safety

- Due to the site's previous contamination, there were concerns about whether the area would be safe for residents using the new infrastructure.
- It was necessary to develop reclamation methods ensuring that use of the heap would not involve the risk of contact with toxic substances.

Solution:

- Limiting access to deeper layers of the heap by securing the surface with vegetation and paths covered with dust-impermeable materials.
- Monitoring soil composition and assessing the environmental impact of the reclamation measures.

4. Integration of the heap with urban space

- The heap had previously been perceived as a degraded, unattractive, and potentially dangerous area.
- Residents might have questioned the legitimacy of the investment and its impact on the quality of life.

Solution:

- Creating recreational infrastructure (walking paths, a sledding track, a BMX track, a Playground, and a viewpoint) to encourage residents to visit the site.
- Public education through information boards and events related to the heap's history and the reclamation processes.

5. Revitalisation costs and financing

- Reclaiming post-industrial areas is a costly process that requires substantial financial outlays.
- City budget financing could have been insufficient, and the project required external funds.

Solution:

- Securing co-financing from EU funds under the LUMAT project and support from the National Fund for Environmental Protection and Water Management.

Thanks to effectively addressing these challenges, the heap has been transformed into an attractive and safe space that benefits both residents and nature.

Jiu Valley (Romania)

The Jiu Valley, which in the 1990s was the country's main hard coal mining centre, experienced a deep economic and social crisis as successive mines were closed. The region struggled with mass unemployment, depopulation, and long-term structural backwardness. The crisis was exacerbated by environmental degradation, damaged infrastructure, and a decline in the quality of public services.

[The development of cycling infrastructure in the Jiu Valley](#) (Valea Jiului) has become one of the most visible and promising elements of the region's transformation after the mine closures, particularly as part of efforts to foster sustainable tourism and revitalise post-industrial areas.

In the Petroșani area and the wider valley, several cycling routes and mountain MTB trails have been created in recent years. The goal of these investments was to bring former mining and forest areas back into use by creating attractive recreational routes with varying levels of difficulty—from easy trails for beginners to demanding enduro and cross-country tracks. An example is the “Baloo” trail, which offers a scenic ride amid nature while also highlighting the region's industrial heritage.

The first completed sections are about 4 kilometres each, but the long-term plan is to develop a comprehensive network covering up to 600 kilometres of cycling routes across the entire Jiu Valley. Both local civic organisations and external experts were involved in the work on these trails, including the International Mountain Bicycling Association (IMBA) and the New Horizons Foundation, led by Dana Bates, which played a key role in planning and community engagement.

Creating cycling trails has not only a tourism dimension but also social and educational value—it promotes a healthy lifestyle, offers activities for young people, and enables residents to rediscover and use the region's natural heritage in a new way, different from decades of industrial exploitation.

3. Action plan

Action	Milestone	Result	Responsible entity	Involved entities
Acquisition/purchase of land from SRK	<ol style="list-style-type: none"> 1. Analysis of the City's financial situation and options for acquiring/purchasing the land 2. Obtaining SRK's preliminary consent to start the acquisition/transfer process (e.g., memo, letter of intent) 3. Conclusion of a preliminary agreement or signing the notarial deed 	Ability to manage the land and obtain funding	City of Czeladź	SRK, City of Sosnowiec

	for the acquisition/transfer of the land			
Establishing an agreement with the City of Sosnowiec	<ol style="list-style-type: none"> 1. Meeting between authorities of Sosnowiec and Czeladź – presentation of plans and identification of common points (e.g., route of the cycle expressway) 2. Development of a joint direction for land use 3. Signing a letter of intent on cooperation / preparing an inter-municipal agreement 4. Conclusion of a formal agreement (if necessary, with the participation of Metropolis GZM) 5. Conducting public consultations – collecting opinions of residents and stakeholders regarding planned actions 6. Development of a joint action plan and commencement of further work (site inventory) 	Inter-municipal agreement	City of Czeladź	City of Sosnowiec
Site inventory	<ol style="list-style-type: none"> 1. Selection of the contractor for the inventory 2. Carrying out a natural, technical, and environmental inventory 3. Final inventory report 	Completed condition diagnosis	City of Czeladź	City of Sosnowiec
Concept developed + Functional and Utility Programme (PFU) prepared	<ol style="list-style-type: none"> 1. Design workshops with residents, partners, and urban planners (public participation) 2. Preparation of the land use concept and its approval by the municipality / project team 3. Preparation of the Functional and Utility Programme (PFU) for a future tender / investment / project application 	Land use concept	City of Czeladź	City of Sosnowiec
Funding application for the investment	<ol style="list-style-type: none"> 1. Identification of funding sources 2. Preparation and submission of a complete funding application 3. Obtaining a decision on the award of funding 	Application submitted	City of Czeladź	City of Sosnowiec

4. Sources

Strategies

- Czeladź City Development Strategy 2024–2030
- Environmental Protection Programme for the Municipality of Czeladź for 2013–2016 with the perspective for 2017–2020

Media publications

<https://metropoliagzm.pl/2024/02/23/velostrada-przez-czeladz-miasto-przygotuje-projekt-i-znajdzie-wykonawce/>

<https://programme2014-20.interreg-central.eu/Content.Node/LUMAT.html>

<https://ietu.pl/?s=lumat>

<https://sprawiedliwa-transformacja.pl/2020/11/06/rumunski-region-weglowy-dolina-jiu-gotowy-na-sprawiedliwa-transformacje/>

Agreements on cycle expressways concluded on 20 May 2022 in GZM (including cycle expressway No. 1 Katowice–Sosnowiec): https://www.zielony-burowiec.pl/uploaded/dokumenty%20pdf/PorozumienieRoweroweKatowiceSosnowiec_20-05-2022.pdf

Academic articles, reports

Report on the implementation of the “Environmental Protection Programme for the City of Czeladź for 2004–2015”, adopted by Czeladź City Council Resolution No. XXXIX/536/2004 of 28 October 2004.

Starzewska-Sikorska, A., Pogrzeba M., Krzyżak J., [Zrównoważone zarządzanie terenami poprzemysłowymi na przykładzie rezultatów projektu LUMAT](#) (Sustainable management of brownfield based on an example of LUMAT project results) in: [Gospodarka surowcowa No. 3/19.](#)

5. Appendices

5.1. Thermographic report (PDF) generated from the OPI TPP 2.0 System

5.2. Report on area 304 generated from the OPI TPP 2.0 System

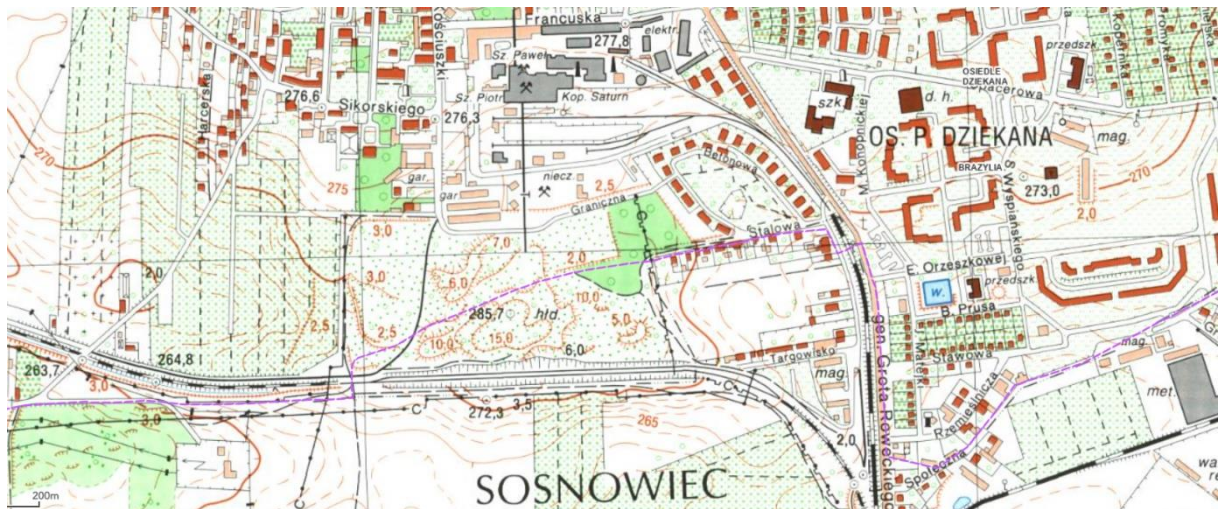
5.3. Maps



Map 1. Map of the site – OSM (source: OPI TPP)



Map 2: Site on the 2022 orthophotomap (source: ORSIP)



Map 3: Site on the 1993 historical map (source: ORSIP)

Annex 3. Action plan – Jastrzębie-Zdrój

1. Characteristics of the post mining area

Site number in the OPI TPP 2.0 database	350 (Jastrzębie Zdrój) + 351(Mszana)
Location (municipality/ municipalities, county)	Jastrzębie-Zdrój (city with county rights), Population: 85,000 Mszana (Wodzisław County), Population: 7,600, Area: 31.4 km ²
Site area	Both areas together cover 47.8 ha (site 350 – 35.5 ha; site 351 – 12.3 ha)
Type of post-mining land	Post-industrial area of the decommissioned mine, including the main plant area, shafts, settling ponds, and the dismantled railway siding.
Current owner(s) of the land	State Treasury (SRK, JSW, JSK), Municipality of Jastrzębie-Zdrój.
Flood risk	No flood risk – the nearest flood risk zone relates to the Szotkówka River valley, located a considerable distance from the site.
Site access	Access from the Jastrzębie-Zdrój side via Górnicza Street. According to the existing road project, the site will be connected to Wodzisławska Street and the Droga Główna Południowa (Main Southern Road), significantly improving accessibility, including for heavy goods vehicles. The “KWK Jas-Mos” bus stop is directly adjacent to the site; additional stops are located slightly further away in the Przyjaźń and Bogoczowiec estates.
Geology and groundwater	According to the Polish Geological Institute, the site is composed of anthropogenic soils; building conditions are limited over the vast majority of the area and average in some fragments. In the eastern part, the hydrogeological map indicates a high groundwater level (0.4 m below ground level); elsewhere, ground and water conditions are varied.
Land use in municipal plans	The entire area is covered by a Local Spatial Development Plan (MPZP) both on the Jastrzębie-Zdrój and Mszana sides. In Jastrzębie-Zdrój, following the MPZP adopted on 29.05.2025, the

	<p>land use changed from mining operations to production–service purposes.</p> <p>In Mszana, most of the area is designated for production facilities, and a smaller part along the Droga Główna Południowa for production, storage and warehousing or for the production of energy from renewable sources (solar) above 100 kW, with accompanying service development.</p>
Current function (site visit or other data source)	Liquidation and reclamation works are being carried out by SRK. Some buildings are still used by entities linked to mining activity: JSW S.A., JSW Szkolenia i Górnictwo (JSWSiG), JSK.
Information on whether the site is or will be defined in the General Plan	The Municipality of Mszana has not completed work on the General Plan. The City of Jastrzębie-Zdrój prepares local plans without the obligation to draw up a General Plan.
Assets located on the site	Remnants of the Jas-Mos mine infrastructure and buildings remain and are being gradually dismantled by SRK. Some of these assets have been listed for sale by SRK. There are two shaft towers on the site with no defined vision for redevelopment or liquidation.
Current activity on the site	Activities related to mining (JSWSiG, JSK) are conducted in part of the buildings (e.g., bathhouse, lamp room). This activity is confined to a marginal section directly on the Jastrzębie-Zdrój side.
Investment potential	<p>The site has high investment potential. Its area, accessibility (including location within reach of an international transport corridor), and the absence of social or environmental conflicts are key pro-development factors. Potential is also supported by the availability of dedicated financing for post-mining areas and mining municipalities. Macroeconomic conditions and regional demographics negatively affect potential.</p> <p>There is strong interest from potential investors (including foreign ones) – as reported by representatives of the Municipality of Mszana.</p>
SWOT	<p>Strengths:</p> <ul style="list-style-type: none"> • large site area, • location within the mining pillar – low risk of mining and geological hazards, • strong connectivity, especially after completion of the road project, • site infrastructure (utilities) is sufficient and attractive to potential investors, • distance from residential development and social acceptance for industrial activity on the site, • MPZP in place, • access to infrastructure networks, • the topic is on the priority list of the City of Jastrzębie-Zdrój. <p>Weaknesses:</p> <ul style="list-style-type: none"> • no coherent concept developed for the site, • fragmentation of plots and ownership structure, • potential further subdivisions following construction of the new transport network, • no established working group for site development with a designated leader,

- lack of a detailed inventory of underground utilities,
- no defined future for the shaft towers,
- low level of entrepreneurship among residents,
- better working and business conditions in the Czech Republic.

Opportunities:

- construction of a new transport system,
- availability of funds for transformation activities,
- inter-municipal agreement,
- the site could be extended northwards towards the ring road, ensuring coherence of site characteristics.

Threats:

- depopulation of the city
- uncontrolled sale of parts of the land
- legal provisions discouraging potential investors – the need to pay perpetual usufruct fees, which cannot be treated as costs

2. Land use plan

Planned site functions	The primary form of land use is industrial production activity. This function will be complemented by services, including investor support, and by the production of energy from renewable sources (RES). If a decision is made to retain and reclaim the shaft towers and/or the lamp room building, a cultural function linked to the existing Carbonarium (in the former bathhouse of the KWK Moszczenica mine) is also considered.
Project leader/operator for the land development	The leader of the entities involved in the redevelopment of the area after the Jas-Mos mine is the City of Jastrzębie Zdrój.
Planned date for site development	2030
Functional zoning	<ul style="list-style-type: none"> – production zone – services and entrepreneurship development zone – RES energy production zone – cultural heritage zone
Project maturity	The most important element completed/in progress is the road connectivity project linking the site with Wodzislawska Street and the Droga Główna Południowa. An important element is also the establishment, for now, of an informal group working for the site's redevelopment, including representatives of Jastrzębie-Zdrój, Mszana, and JSW. The topic is also being discussed within the City Council of Jastrzębie-Zdrój.
Potential partners or stakeholders	<ul style="list-style-type: none"> • City of Jastrzębie-Zdrój, • Municipality of Mszana, • JSW, • JSK, • KSSE (Katowice Special Economic Zone), • SRK, • GIG-PIB Katowice (Central Mining Institute – National Research Institute), • Regional Road Authority, • Utility providers.

Potential buyers of the land (specific examples or types of buyer)	<ul style="list-style-type: none"> • production enterprises, • logistics companies, • energy producers, • business support organisations.
Alignment with local and regional strategies	The site is identified as an investment area in the “Jastrzębie-Zdrój City Development Strategy 2030+”.
Possible sources of financing for the site	<ul style="list-style-type: none"> • Just Transition Fund • European Funds for Silesia 2021–2027 • Silesian Province Transformation Fund • City budget
Environmental and climate aspects	Given the character of the site and the planned functions, no designation is foreseen for biodiversity areas or direct climate adaptation measures. At the same time, all investments will observe the principles of sustainable development and DNSH.
Expected direct and indirect beneficiaries	The project’s direct beneficiaries will be entrepreneurs locating their businesses in the former Jas-Mos mine area. Indirect beneficiaries will include employees of newly established enterprises and existing businesses.
Good practices	<p>The "Greenmine" project is a Czech initiative focused on the sustainable revitalization of post-mining areas in the Ústí nad Labem Region in the Czech Republic. The project aims to transform degraded post-industrial areas – primarily those left after lignite mining – into modern spaces conducive to economic, environmental, and social development. The project promotes the use of innovative technologies, renewable energy, and a circular economy approach. The involvement of local communities and cooperation with the public and private sectors are key elements. Green Mine supports the transformation of mining regions towards a green economy, in line with the goals of the European Green Deal and the Just Transition Fund. The project is funded by European Union funds (JTF) and implemented by Seven Inntech a.s. The project is based on three pillars:</p> <ol style="list-style-type: none"> 1. Site preparation encompasses key stages of preparing the site from a technical, landscape, and urban perspective to enable further development. This stage is crucial for developing transport infrastructure to facilitate connections between the post-mining areas. 2. Development projects focus on innovation and research that open up new possibilities for utilising the post-mining landscape. 3. Human resources, outreach, and education are aimed at strengthening skills, promoting education, and informing the public about the project’s vision and progress.

The [DUST](#) (Democratising Just Sustainability Transitions) project, funded by the European Union's Horizon 2020 program, aims to strengthen citizen participation and equity in environmental transition processes, particularly in the context of sustainable development policies at the local and regional levels. The project offers stakeholder mapping tools, scenarios for workshops on future development, and citizen panels. The

project promotes stakeholder engagement at the early stages of projects.

The project is implemented by an international research consortium with the participation of the University of Economics in Katowice.

3. Action plan

Action	Milestone	Result	Responsible entity	Involved entities
Construction of a new transport system	<ol style="list-style-type: none"> 1. Preparation of a transport concept considering the existing network and planned land use – final arrangements (COMPLETED) 2. Obtaining an environmental decision (if required) 3. Preparation of the building design and obtaining a building permit 4. Tender procedure for the contractor 5. Start and completion of construction works (in stages) 	Better accessibility of the site	City of Jastrzębie-Zdrój	Regional Road Authority
Acquisition/purchase of land from SRK	<ol style="list-style-type: none"> 1. Determining the scope of land to be taken over 2. Negotiations with SRK and obtaining initial takeover conditions 3. Conclusion of a preliminary agreement (letter of intent / preliminary contract) 4. Finalisation of the land acquisition transaction 	Ability to manage the land and obtain funding	City of Jastrzębie-Zdrój	SRK
New cadastral (geodetic) subdivision of the site	<ol style="list-style-type: none"> 1. Commissioning geodetic works (based on the land use concept or inventory) 2. Carrying out measurements and subdivision designs 3. Submitting documentation for approval to the authority 4. Obtaining the subdivision decision and updating the land register 	Increased site functionality	City of Jastrzębie-Zdrój	Municipality of Mszana

Site inventory	<ol style="list-style-type: none"> 1. Selection of the inventory contractor 2. Conducting natural, technical, and environmental inventory 3. Final inventory report 	Completed condition diagnosis	City of Jastrzębie-Zdrój	SRK, GIG-PIB, JSW
Development and commercialisation concept	<ol style="list-style-type: none"> 1. Workshops with stakeholders (residents, investors) 2. Preparation of preliminary development variants based on results from the pilot action implemented under the OPI TPP 3.0 project 3. Selection of the target model 4. Preparation of the final urban and functional concept 5. Approval of the concept by the municipality and council 	Selected site operator and commercialisation model	City of Jastrzębie-Zdrój	Municipality of Mszana, KSSE, JSW
Investment offer preparation	<ol style="list-style-type: none"> 1. Preparation of an information package (location, utilities availability, land-use plan) 2. Definition of investment conditions (form of sale/lease, public support) 3. Launch of investor acquisition process 	Investment offer	City of Jastrzębie-Zdrój	Municipality of Mszana, KSSE

4. Sources

Strategies

- Jastrzębie-Zdrój City Development Strategy 2030+
- Local Revitalisation Programme of Jastrzębie-Zdrój to 2020
- 2024 City Status Report
- Resolution No. XII/120/2007 of the Jastrzębie-Zdrój City Council of 28 June 2007 on the local spatial development plan for a fragment of the Centre unit (working symbol C75) in Jastrzębie-Zdrój

Media publications

- <https://www.dustproject.eu/pl>

5. Appendices

5.1. Report on area 350 generated from the OPI TPP 2.0 System

5.2. Report on area 351 generated from the OPI TPP 2.0 System

5.3. Maps



Map 1: Site map – OSM (source: OPI TPP)



Map 2: Site on the 2022 orthophotomap (source: ORSIP)



Map 3: Site on the historical map from 1994–2002 (source: ORSIP)

Annex 4. Action plan – Miedźna

1. Characteristics of the post mining area

Site number in the OPI TPP 2.0 database	307
Location (municipality/municipalities, county)	Miedźna (Pszczyna County), Area: approx. 50.24 km ² , Population: 15,689 (as of 2023)
Site area	62,6 ha
Type of post-mining land	Post-industrial area of the decommissioned mine, including the main plant area, shafts, and a railway siding.
Current owner(s) of the land	State Treasury (SRK, PGG), Municipality of Miedźna, Pszczyna County, private individuals.
Flood risk	No flood risk – the nearest flood risk zones relate to the valleys of the Vistula and Pszczynka rivers, located a considerable distance from the site.
Site access	Access to the site is possible from several directions, including for heavy goods vehicles. A railway siding operates on the site. Works are currently being completed on the S1 expressway section Mysłowice–Bielsko-Biała and the Wola junction, which will connect the site at a supra-regional level.
Geology and groundwater	According to the Polish Geological Institute, the site is composed of anthropogenic soils, and building conditions are limited across the vast majority of the area. The northern section of the site lies in a zone at risk of groundwater-related waterlogging.

Land use in municipal plans	<p>There is no Local Spatial Development Plan (MPZP) for the site. In the draft General Plan, the area is designated across three zones:</p> <p>SERVICE ZONE Functional profile: services; transport; landscaped green areas; allotment gardens; technical infrastructure; storage and warehousing; solar power plant; natural greenery; forest; water areas.</p> <p>TRANSPORT ZONE Functional profile: motorway; expressway; principal arterial roads; main roads; rail transport; cable car transport; water transport; air transport; transport service areas; allotment gardens; technical infrastructure; collector roads; landscaped green areas; forest; natural greenery; water areas.</p> <p>ECONOMIC ZONE Functional profile: production; transport; landscaped green areas; allotment gardens; technical infrastructure; services; natural greenery; forest; water areas.</p>
Current function (site visit or other data source)	<p>Activities include mine dewatering, rolling stock servicing and repair, and municipal wastewater treatment. At the EC Czczcott power facility, Węglokoks is currently building a cogeneration installation. The site also hosts coal and aggregate suppliers and pallet operations (ZRB, eco-pea coal, private firms).</p>
Information on whether the site is or will be defined in the General Plan	<p>The municipality has not yet completed work on the General Plan.</p>
Assets located on the site	<p>Remnants of the Czczcott mine infrastructure and buildings, mining shafts, buildings, EC Czczcott energy facility, wastewater treatment plant, and locomotive depot.</p>
Current activity on the site	<ul style="list-style-type: none"> • Mine dewatering • Wastewater treatment • Energy production • Production support • Services
Investment potential	<p>The site has high investment potential. Its area and accessibility, including its location within reach of an international transport corridor, are key strengths. Potential is further supported by the availability of dedicated funding for post-mining areas and mining municipalities. Unlike most of the country, demographic conditions are also favourable.</p> <p>A key challenge is maintaining positive public sentiment and avoiding social conflicts amid high expectations of residents accustomed to the suburban character of the locality. The site lies between the Pszczyńska and Vistula valleys, placing it within a bird ecological corridor, which limits options for projects with significant environmental impacts (e.g., gravel deposits).</p>

SWOT

Strengths:

- large site area,
- location within the mining pillar – low risk of mining and geological hazards,
- strong connectivity, especially after the opening of the S1 section,
- railway siding,
- distance from residential development,
- access to infrastructure networks.

Weaknesses:

- no coherent concept developed for the site,
- fragmentation of plots and ownership structure,
- no established working group for site development with a designated leader,
- lack of an inventory of underground utilities,
- social resistance to locating burdensome investments,
- underdeveloped public participation process.

Opportunities:

- construction of a new transport system,
- availability of funds for transformation activities,
- favourable demographic conditions.

Threats:

- social conflicts,
- uncontrolled sale of parts of the land.

2. Land use plan

Planned site functions	The primary form of land use is industrial production, energy-related activity, and municipal services. This function will be complemented by services, including investor support and entrepreneurship development.
Project leader/operator for the land development	The leader of the entities involved in the redevelopment of the former mine site is the Miedźna Commune.
Planned date for site development	2030
Functional zoning	<ul style="list-style-type: none">– production zone– energy production and municipal services zone– services and entrepreneurship development zone
Project maturity	The project is at an early stage. Initial talks have been held with KSSE and with businesses interested in locating their activities on the site. Works are also underway to organise site infrastructure, including stormwater drainage.
Potential partners or stakeholders	<ul style="list-style-type: none">• Municipality of Miedźna,• Pszczyna County,• KSSE (Katowice Special Economic Zone),• SRK,• PGG,• National Support Centre for Agriculture (pl. Krajowy Ośrodek Wsparcia Rolnictwa - KOWR).

Potential buyers of the land (specific examples or types of buyer)	<ul style="list-style-type: none"> • production enterprises, • logistics companies, • energy producers, • business support organisations.
Alignment with local and regional strategies	Under the Miedźna Municipality Development Strategy 2024–2030, Objective 3.2 “Increasing investment attractiveness” includes actions for the reindustrialisation of post-mining areas.
Possible sources of financing for the site	<ul style="list-style-type: none"> • Just Transition Fund, • European Funds for Silesia 2021–2027, • Silesian Province Transformation Fund, • Municipal budget.
Environmental and climate aspects	Given the character of the site and the planned functions, no designation is foreseen for biodiversity areas or direct climate adaptation measures. At the same time, all investments will observe the principles of sustainable development and DNSH, particularly considering the suburban character of the locality, its proximity to the Pszczyńska and Vistula valleys, and its location within an ecological corridor.
Expected direct and indirect beneficiaries	The direct beneficiaries of the project will be entrepreneurs locating their business activities on the site of the former Czczott mine. The indirect beneficiaries will be employees hired by the newly established enterprises, as well as the businesses operating in the vicinity.
Good practices	<p>KSSNON, as a Katowice Special Economic Zone programme, can provide an interesting, comprehensive solution for the Municipality of Miedźna, which faces challenges in redeveloping post-mining areas, including limited staffing and administrative capacity compared to larger cities such as Jastrzębie, Bytom, or Sosnowiec. The programme supports municipalities in economic transformation, particularly in post-industrial and post-mining areas, including preparing investment sites, attracting investors, strategic advisory, and developing local competencies.</p> <p>In municipalities such as Brzeszcze, Sławków, and Czechowice-Dziedzice, KSSNON has played a key role as a system partner that not only supports planning and redevelopment of challenging sites but also helps build municipal institutional capacity. For Miedźna—where limited staffing makes it difficult to independently run complex post-mining revitalisation projects—cooperation with KSSE could fill this gap by providing expert support and proven local development tools.</p> <p>With its structure and role as a business environment institution, KSSNON can also facilitate access to financing (national or EU funds) and streamline engagement with potential investors interested in degraded sites. This offers Miedźna an opportunity for a balanced economic transition with a partner experienced in working with municipalities of similar scale and challenges.</p>

3. Action plan

Action	Milestone	Result	Responsible entity	Involved entities
Acquisition/purchase of land	1. Identification of owners and legal	Ability to manage the	To be determined	SRK

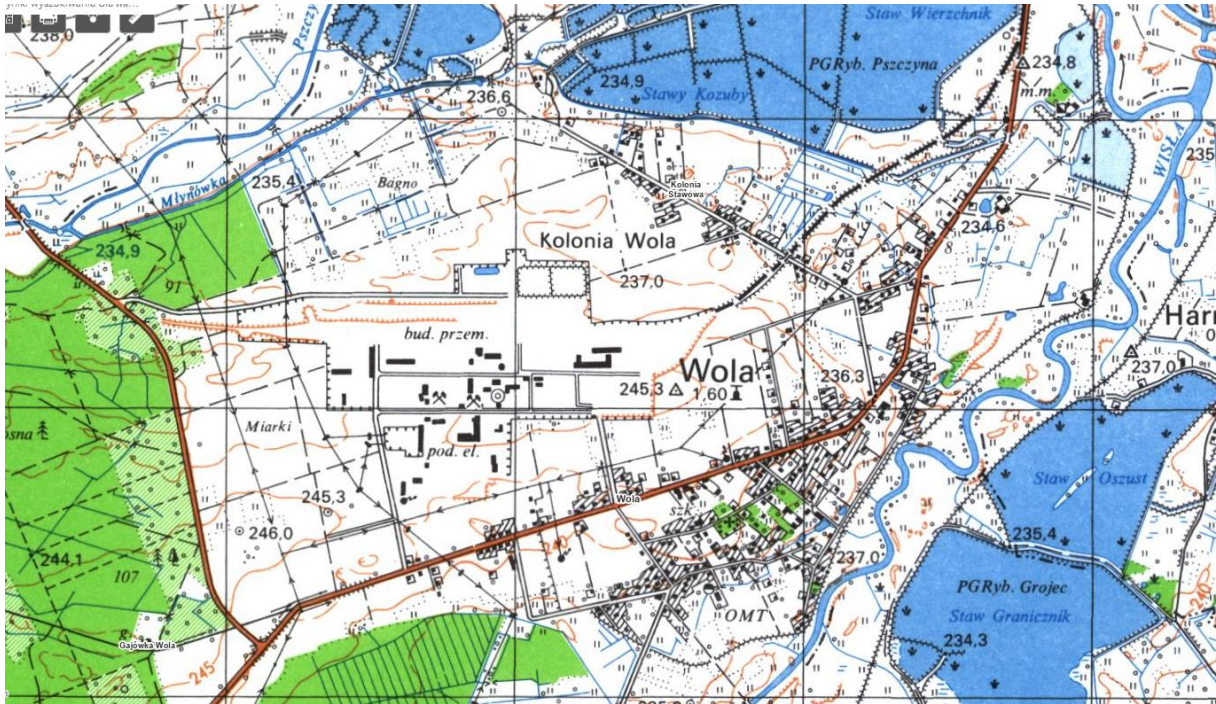
from SRK and private owners	<p>status of plots (SRK, private individuals, companies, municipality).</p> <ol style="list-style-type: none"> 2. Analysis of legal risks and constraints (e.g., mining damage, mortgages, unsettled legal status). 	land and obtain funding		
New cadastral (geodetic) subdivision of the site	<ol style="list-style-type: none"> 1. Commissioning geodetic works (based on the land use concept or inventory) 2. Carrying out measurements and subdivision designs 3. Submitting documentation for approval to the authority 4. Obtaining the subdivision decision and updating the land register 	Increased site functionality	To be determined	Pszczyna County
Site inventory	<ol style="list-style-type: none"> 1. Selection of the inventory contractor 2. Conducting natural, technical, and environmental inventory 3. Final inventory report 	Completed condition diagnosis	To be determined	SRK, GIG-PIB, PGG
Development and commercialisation concept	<ol style="list-style-type: none"> 1. Workshops with stakeholders (residents, investors) 2. Preparation of preliminary development variants 3. Selection of the target model 4. Preparation of the final urban and functional concept 5. Approval of the concept by the municipality and council 	Selected commercialisation model	To be determined	KSSE, PGG, Węglokoks
Appointment of a dedicated operator for the	<ol style="list-style-type: none"> 1. Analysis of available operating forms (special purpose 	Establishing a	To be determined	KSSE

site or cooperation with KSSE	<p>vehicle, fund, KSSE operator, etc.)</p> <ol style="list-style-type: none"> 2. Selection of management model and partner (e.g., KSSE, ARP, strategic investor) 3. Signing framework agreements or establishing a legal entity 4. Defining the operator's scope of competencies and responsibilities for the site 	commercialisation leader		
Investment offer preparation	<ol style="list-style-type: none"> 1. Preparation of an information package (location, utilities availability, land-use plan) 2. Definition of investment conditions (form of sale/lease, public support) 3. Launch of investor acquisition process 	Investment offer	To be determined	KSSE

4. Sources

Strategies

- Miedzna Municipality Development Strategy 2024–2030
- 2024 Status Report of the Municipality of Miedzna
- Draft General Plan of the Municipality of Miedzna
- Study of Conditions and Directions of Spatial Development of the Municipality of Miedzna



Map 3: Site on the historical map (source: ORSIP)

Annex 5. Action plan – Sosnowiec

1. Characteristics of the post mining area

Number of the site in the OPI-TPP 2.0	Site no 298
Location (municipality, county)	Sosnowiec, a city with county rights, Area: approx. 91.06 km ² , Population: 191,676 inhabitants (as of 2023), Dworcowa Street, Kazimierz Górniczy district.
Area of the site	23,5 ha
Type of post-mining area	Buildings (located on an area of 3.5 ha covered by the „Kazimierz OdNowa” project), slag heap, vegetation grown without human intervention, including trees and shrubs (Map 7, Map 8, Map 9, Map 10, Map 11).
Current owner(s) of the area	State Treasury (The Company Restrukturyzacja Kopalń - SRK), City of Sosnowiec.
Occurrence of flood risks	No flood risk
Transport links and accessibility of the area	The area is well connected by road, rail, and public transport. <ul style="list-style-type: none"> · 2.5 km to the S1 expressway junction, · 5 km to the intersection of the S1 and national road 94 · 12.5 km to the intersection of the S1 expressway and the A4 motorway. · railway station nearby (Sosnowiec Kazimierz) located on Dworcowa Street, · 250 to 500 m to bus/tram stops (including the GZM metropolitan line) (Map 12).

Geology and groundwater	Quaternary formations developed in the form of glacial sands and gravels, glacial clays, Holocene valley bottom silts, deluvial clays and sands on mudstones, mudstones, sandstones, conglomerates, and hard coal (unseparated Upper Carboniferous formations) as well as Lower Westphalian Carboniferous formations in the form of mudstones and claystones with interlayers of sandstones and hard coal – mudstone series. The area is located outside the GZWP area (Map 13).
Land use in municipal plans	The area is not covered by the local spatial development plan. According to the document “Study of conditions and directions of spatial development of the city of Sosnowiec” from 2006 (amendments in 2018, 2022), it is designated for production areas and green areas.
Current function (site inspection or other data source)	Undeveloped area: trees and shrubs, spoil heap, area covered with concrete slabs (eastern part). Fragment of the area on the northern side, 3.5 ha – work related to the Kazimierz OdNowa project is underway.
Information on the area being covered by the new Polish strategic spatial planning document	The city began developing a new strategic spatial planning document on October 31, 2024.
Facilities located on the premises	Buildings located within the Kazimierz OdNowa project area (3.5 ha) undergoing adaptation for new functions (map 5), spoil tips and heaps, and the Mortimerowski ditch on the remaining area.
Activities currently conducted on the premises	Works related to the Kazimierz OdNowa are carried out by the municipality (3.5 ha). No activity is carried out on the remaining area.
Investment potential	The area has good investment potential for residential development. Developing the area for residential purposes will require analysis and testing, including soil quality and load-bearing capacity tests. Another risk is the possibility of independent development of part of the land (e.g., before transfer) in a manner that may conflict with subsequent decisions regarding the development of the entire area.
SWOT	<p>Strengths:</p> <ul style="list-style-type: none"> · Good connections to road, rail, and public transport infrastructure. · Part of the area is covered by the Kazimierz OdNowa project – currently undergoing transformation. · Uncomplicated ownership structure of the land. · Presence of natural greenery, including trees and shrubs, which can be used for future residential and/or commercial and/or recreational and leisure development offering ecosystem services. · Favourable location in the vicinity of residential buildings (on the northeast side) in the case of residential use. <p>Weaknesses:</p> <ul style="list-style-type: none"> · Potential contamination of the area. · Vegetation growth – possibility of invasive species.

- Difficulties related to the course of the Mortimer Ditch – (flooding, backwater).

Opportunities:

- The Mines Restructuring Company's (Spółka Restrukturyzacji Kopalń), SRK positive attitude towards transferring the land to the municipality (letter of intent signed).
- Availability of funds for the transformation of post-mining areas.
- The municipality's extensive experience to date in taking over and developing post-mining areas for public purposes based on good cooperation with the SRK
- Implementation of the Kazimierz OdNowa project, which will result in the socio-economic revitalisation of the area.
- The proximity of the area undergoing forest reclamation (on the south side) – the forest would complement the ecosystem services if they were created in the analysed area, as well as in the case of residential development.
- The possibility of using the groundwater settling tank located in the analysed area for retention purposes – drainage of this area.
- Possibility of using part of the land for compensatory tree planting in the city

Threats:

Interpretation of Article 23 of the Act of September 7, 2007, on the functioning of hard coal mining (Journal of Laws 2024.1383) concerning the transfer of land by the SRK to municipalities, applied by the Office of Competition and Consumer Protection (UoKiK) as a restriction on the use of land for residential purposes, with the possible introduction of commercial functions.

- Lack of knowledge about the condition of the land, including the lack of geochemical studies related to land subsidence and hydrological conditions, and lack of funds for these purposes.
- Lack of studies certifying the absence of land contamination.
- Lack of inventory or assessment of the condition of greenery.
- Lack of the municipality's own funds for possible revitalisation of the area (provided that the right to control the area is obtained).
- Poor identification of pollution and the exact course of the Mortimerowski Ditch.

2. Site development plan

Planned land use functions	The municipality is considering introducing a residential function or developing green areas (e.g. for recreational purposes).
Land development project leader/operator	The leader of the land development project will be the City of Sosnowiec.
Planned date of the development/transformation of the site	The municipality has not specified a date for the development of the site.
Division into functional zones	<ul style="list-style-type: none">· Residential (preliminary)· Recreational (preliminary)
Project maturity	The project is in its initial stage of development. On a scale of 1 to 5, the Kazimierz OdNowa project area: 4, for the remaining area: 1
Potential project partners or stakeholders	<ul style="list-style-type: none">· City of Sosnowiec· The Company Restrukturyzacja Kopalń (SRK)
Potential land buyers (specific examples or buyer type)	City of Sosnowiec.
Alignment with local and regional strategies	<p>The transformation of the site through the preservation and development of landscaped green areas is part of the implementation of the “Plan for the adaptation of the city of Sosnowiec to climate change by 2030” (2019) as a factor increasing the city’s resilience to the predicted changes in the intensity and frequency of climatic phenomena and their derivatives.</p> <p>In addition, activities in this area implement the objectives of the Silesian Province Development Strategy “Green Silesia” (2020) relating to the creation of a high-quality environment and space in the region through the reclamation and revitalisation of degraded areas and the development of post-industrial areas, including for environmental and recreational purposes, and the improvement of the attractiveness of public spaces.</p> <p>The development of housing meets the provisions of the Sosnowiec City Development Strategy until 2020 (2007) relating to improving the health, living conditions, and social and public safety of residents, including housing conditions.</p>
Possible sources of financing of the area transformation	<ul style="list-style-type: none">· European Funds for Silesia 2021-2027 (and the future perspective)· Just Transition Fund· the Silesian Province Transition Fund,· Voivodeship Fund for Environmental Protection and Water Management,· Budget of the City of Sosnowiec.

Addressing environmental and climate aspects

In the area covered by the Kazimierz OdNowa project, it is planned to introduce greenery into the recreational space, which will not only serve aesthetic functions but will also have a positive impact on the effects of climate change. In the remaining area, the preservation of the existing greenery covering the area is being considered (after assessing its condition and tidying it up). The introduction/preservation of greenery will enhance biodiversity and regulate the climate in the Kazimierz district of Sosnowiec by mitigating extreme weather events such as high temperatures, heat waves, and heavy rainfall.

Expected direct and indirect beneficiaries of the project

Inhabitants of the City of Sosnowiec.

Good practice examples

Nowe Gliwice Business Center, Culture Zone in Katowice, Silesia City Center – Dębowe Tarasy, Financing environmental projects.

Development of post-mining areas for housing purposes

An analysis of cases in the Czech Republic and Germany shows that it is possible to finance social housing in post-mining areas taken over from the state without violating state aid rules. In the Czech Republic, a special program has been developed to support the construction of rental apartments with preferential financing terms. This program has been approved by the European Commission as compatible with state aid rules. The aim of the program is to support the construction and renovation of rental apartments with rents below market rates. The project budget is approximately CZK 12 billion (over PLN 2.04 billion) until 2030. The available forms of support are: 1) grants covering up to 40% of the investment costs, and 2) preferential loans for the remaining costs, with an interest rate 3 percentage points lower than the EU base rate, with a repayment period of up to 30 years and the possibility of early repayment without additional fees. The beneficiaries of the program may be local governments, state organisations, and other public entities. The condition for the implementation of the program is that the apartments must be rented to people who meet specific income criteria, including young people, families with children, and public service employees. ([IEUmonitoring.com](https://www.ieu-monitoring.com), 2025; [CIJEurope.com](https://www.cij-europe.com), 2024)

In Germany, the transfer of post-mining land to municipalities for residential purposes takes place within the framework of local development plans (Bebauungsplan). In 2021, the Building Land Mobilisation Act (Baulandmobilisierungsgesetz) was introduced, which allows municipalities to specify in their local plans that only residential buildings meeting social housing criteria may be built on a given site. The condition is that the developer must conclude an urban planning agreement committing to comply with the conditions for the promotion of social housing, in particular, rent indexation. This approach allows municipalities to control the use of post-mining land and ensure that it is used in accordance with local housing needs, while complying with EU rules on state aid.

3. Action plan

Action	Milestone	Result	Responsible entity	Entities involved
1. Developing a preliminary proposal for the direction(s) of site development.	1. Determining the purpose of site development 2. Agree on a preliminary proposal for site development	The municipality has defined the purpose of the area transformation.	Sosnowiec City Hall	Sosnowiec City Hall
2. Explaining the interpretation adopted by the Office of Competition and Consumer Protection (UOKiK) of the legal provisions relating to the transfer of post-mining areas by The SRK to municipalities for public purposes.	Official interpretation of legal provisions.	The municipality has reliable knowledge of legal regulations and a basis for determining the purpose of land conversion.	Sosnowiec City Hall	Sosnowiec City Hall
3. Verification of the conditions for the transformation of the land in the selected direction(s) of site development.	Conducting research and analyses (including, for example, geochemical and hydrological studies, soil bearing capacity tests, inventory and assessment of the condition of greenery, determining the scale of the problem of invasive vegetation, and outlining plans for the use of greenery).	The municipality obtains the results of research and analyses that form the basis for investment planning.	Sosnowiec City Hall	Sosnowiec City Hall, consulting firms, research units, and others.
4. Selection of the future function of the site and including it in the new strategic spatial planning document	Analysis of opportunities, barriers, costs, and benefits for selected functions. Agreement and decision-making	Provisions of the new strategic spatial planning document	Sosnowiec City Hall	Sosnowiec City Hall
5. Defining the public purpose for transforming the area in the chosen direction.	Defined purpose of land conversion.	The adopted objective meets the conditions for the municipality to obtain legal grounds for controlling the area.	Sosnowiec City Hall	Sosnowiec City Hall

6. Conducting an analysis of the possibilities for financing the activities.	Preparation of a report analysing available sources of financing	The municipality has knowledge about available financing options and effective methods of obtaining funds for project implementation.	Sosnowiec City Hall	Sosnowiec City Hall
7. Acquisition of land from The SRK in accordance with the designated public purpose (terms of the agreement with SRK)	Agreement/arrangement to transfer the land to the municipality.	The municipality has knowledge about available financing options and effective methods of obtaining funds for project implementation.	Sosnowiec City Hall , SRK.	Sosnowiec City Hall, SRK.
8. Planning of activities	Elaborating on the site development plans (e.g., remediation plan, construction conditions, PFU for investments).	The municipality has substantive grounds for planning activities.	Sosnowiec City Hall	Sosnowiec City Hall
9. Determining development/transformation ways for neighbouring areas	Agreement on ways of development/transformation of neighbouring areas owned by the municipality	Ways of development/transformation of neighbouring areas are consistent with or complementary to the direction(s) of 298 site development.	Sosnowiec City Hall	Sosnowiec City Hall, stakeholders of the development/transformation of neighbouring areas
10. Obtaining funding for the development/transformation of the site	Allocation of funds to the municipality by financing institutions.	The municipality is the administrator of funds for the transformation of the area.	Sosnowiec City Hall	Sosnowiec City Hall, companies providing support in preparing grant applications, and financing institutions
11. Realisation	Implementation of individual stages of work	Acceptance of work (including construction and other works) by the municipality.	Sosnowiec City Hall	Sosnowiec City Hall, contracting companies.

4. Sources

Strategies:

- Plan for the adaptation of the city of Sosnowiec to climate change by 2030, 2019, Let's get into the climate, MPA 44, Resolution No. 274/XVI/2019 of the City Council of Sosnowiec of September 26, 2019, on the adoption of the "Plan for the adaptation of the city of Sosnowiec to climate change by 2030 [<https://www.bip.um.sosnowiec.pl/a,538175,uchwala-nr-274xvi2019-rady-miejskiej-w-sosnowcu-z-dnia-26-wrzesnia-2019-r-w-sprawie-przyjecia-planu-.html>].

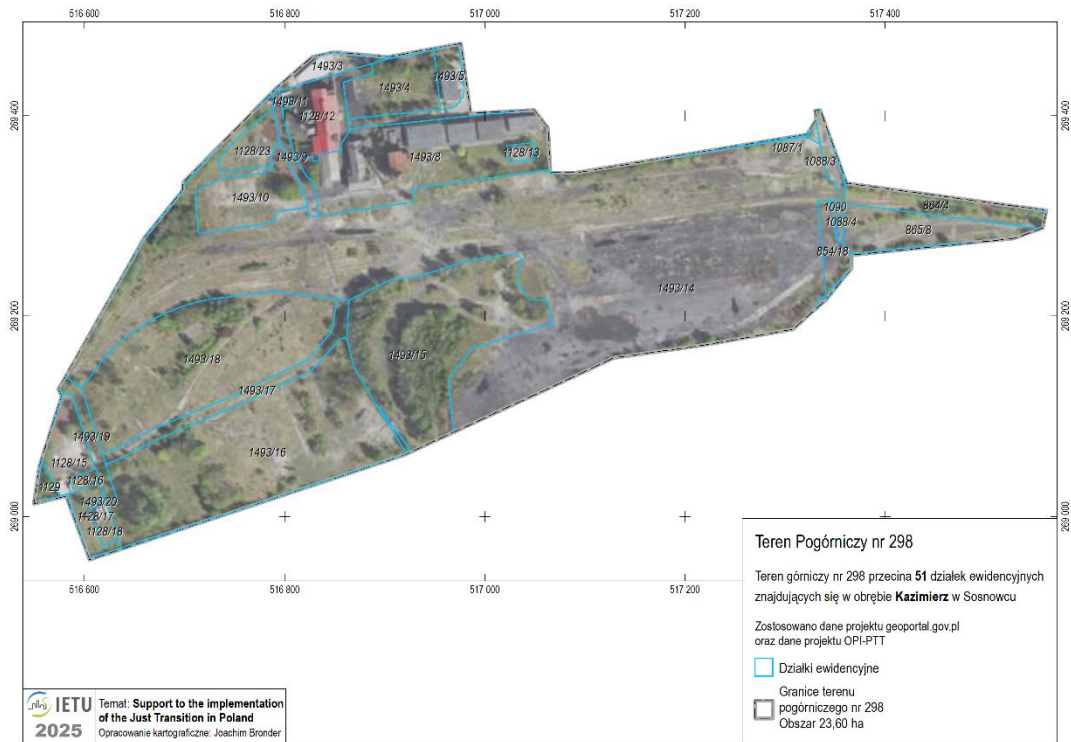
- Sosnowiec City Development Strategy until 2020, Sosnowiec 2007, Resolution No. 162/XII/07 of the Sosnowiec City Council of May 24, 2007 [<https://www.sosnowiec.pl/urząd-miejski-w-sosnowcu/dokumenty-strategiczne>].
- Development strategy for the Silesian Province, “Green Silesia” (2020), Resolution of the Silesian Provincial Assembly No. VI/24/1/2020 of October 19, 2020, Katowice, October 2020 [<https://www.slaskie.pl/content/strategia-rozwoju-województwa-slaskiego-slaskie-2030>]

Law:

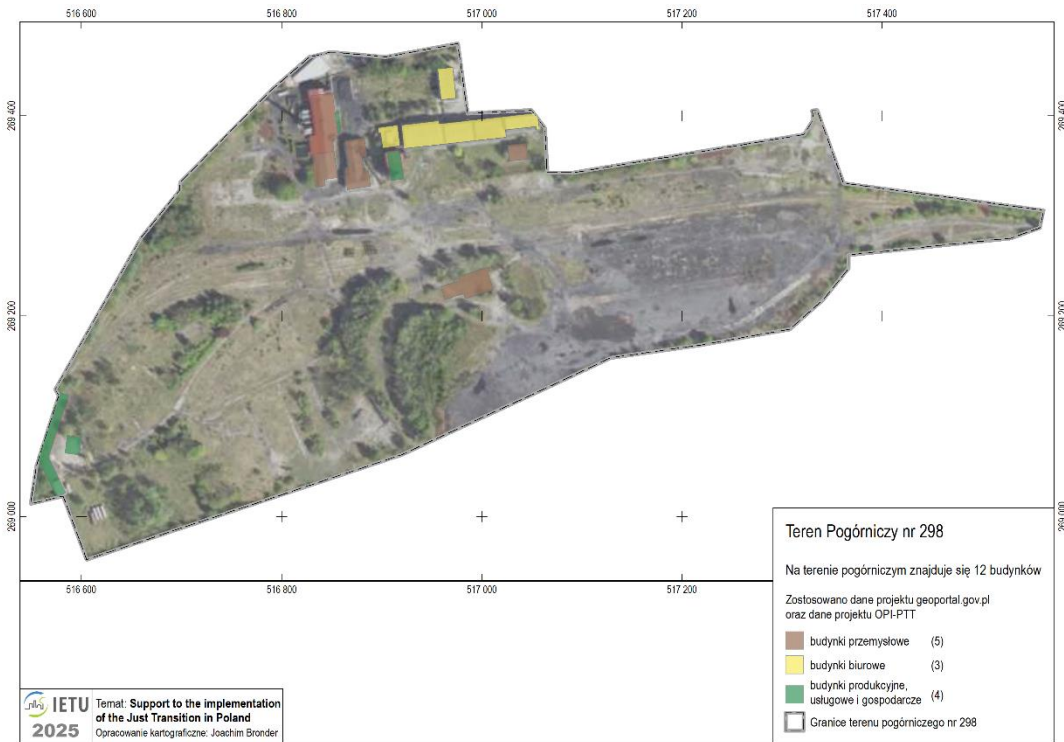
- Act of September 7, 2007 on the functioning of hard coal mining (Dz.U. 2007 nr 192 poz. 1379)
- Act of August 21, 1997, on real estate management (Dz. U. 1997 nr 115 poz. 741),

5. Appendices

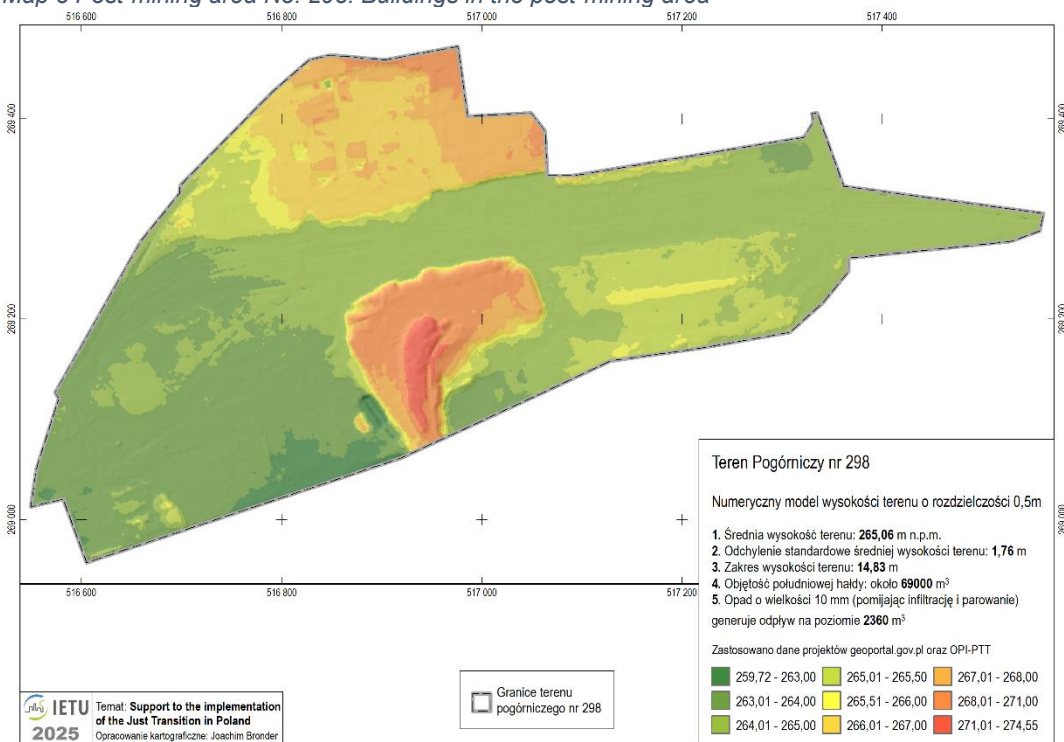
Appendice no. 1 Map



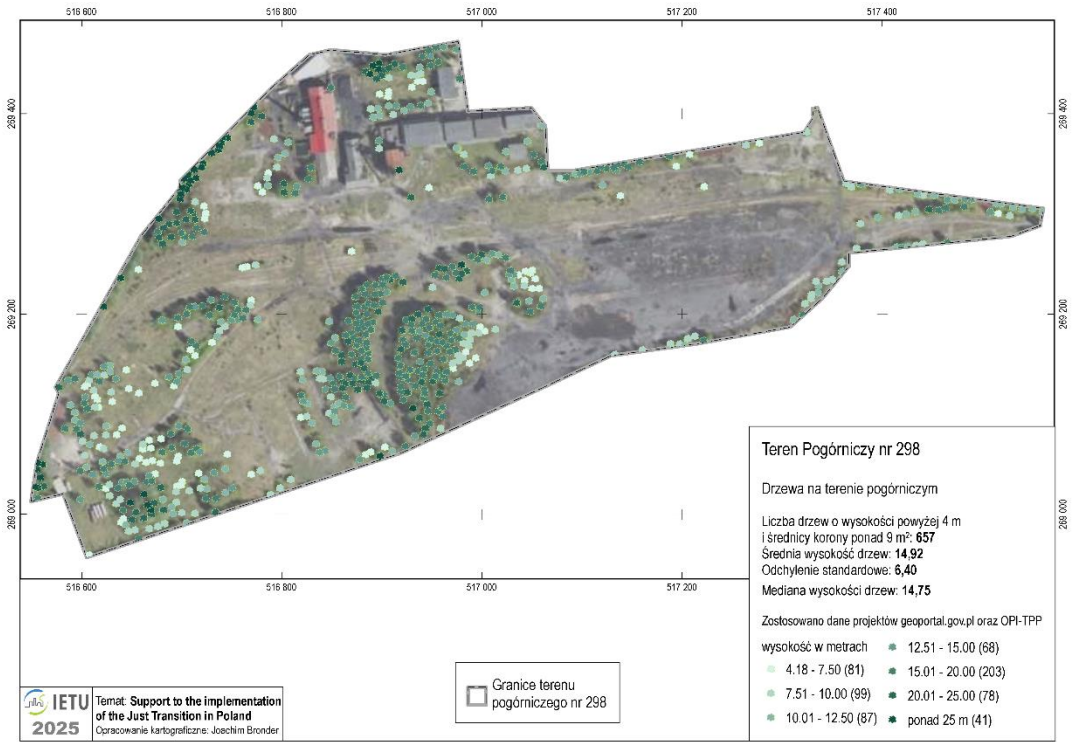
Map 7 Post-mining area No. 298: Registered plots



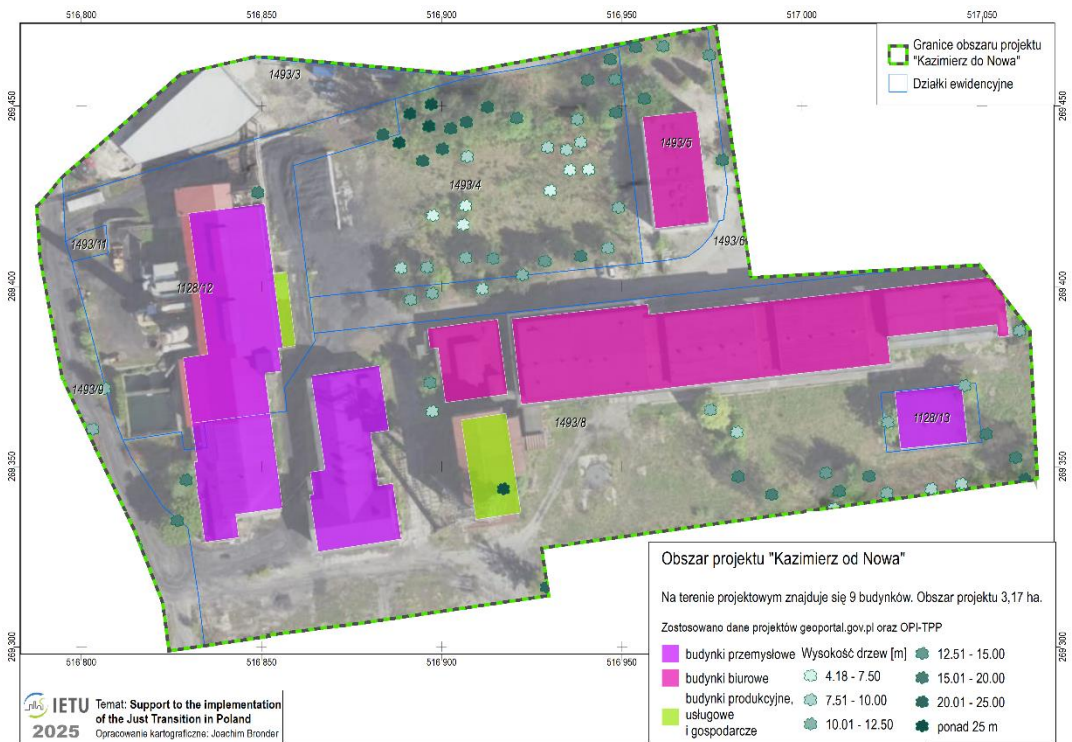
Map 8 Post-mining area No. 298: Buildings in the post-mining area



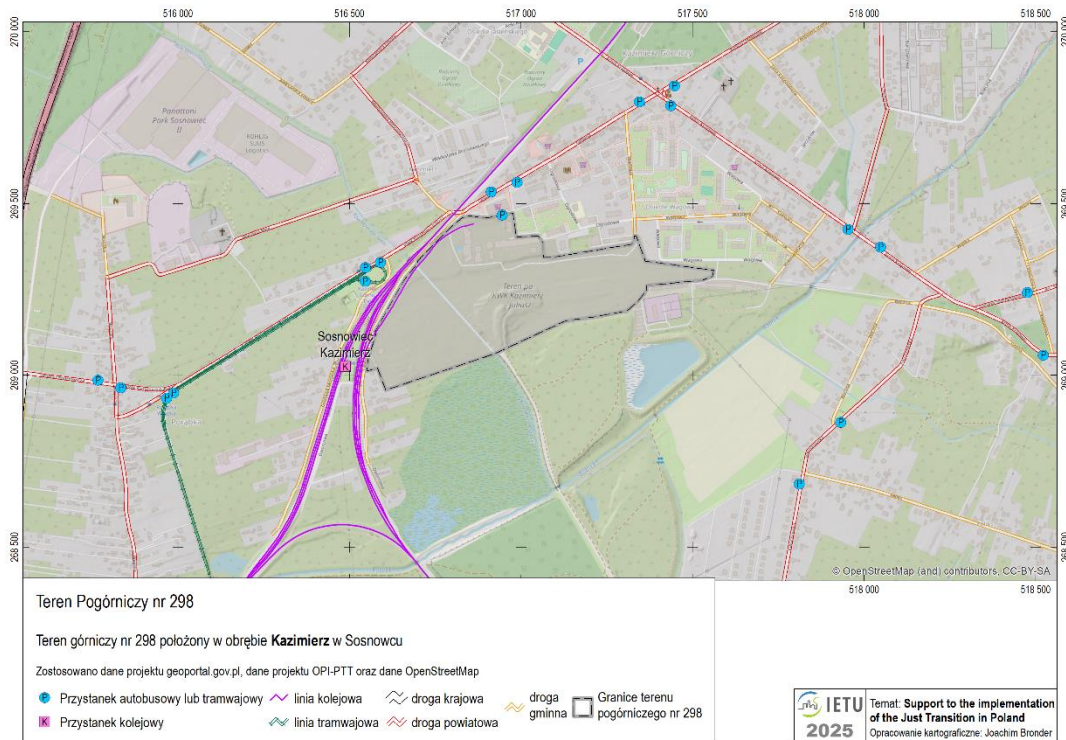
Map 9 Post-mining area No. 298: Digital elevation model



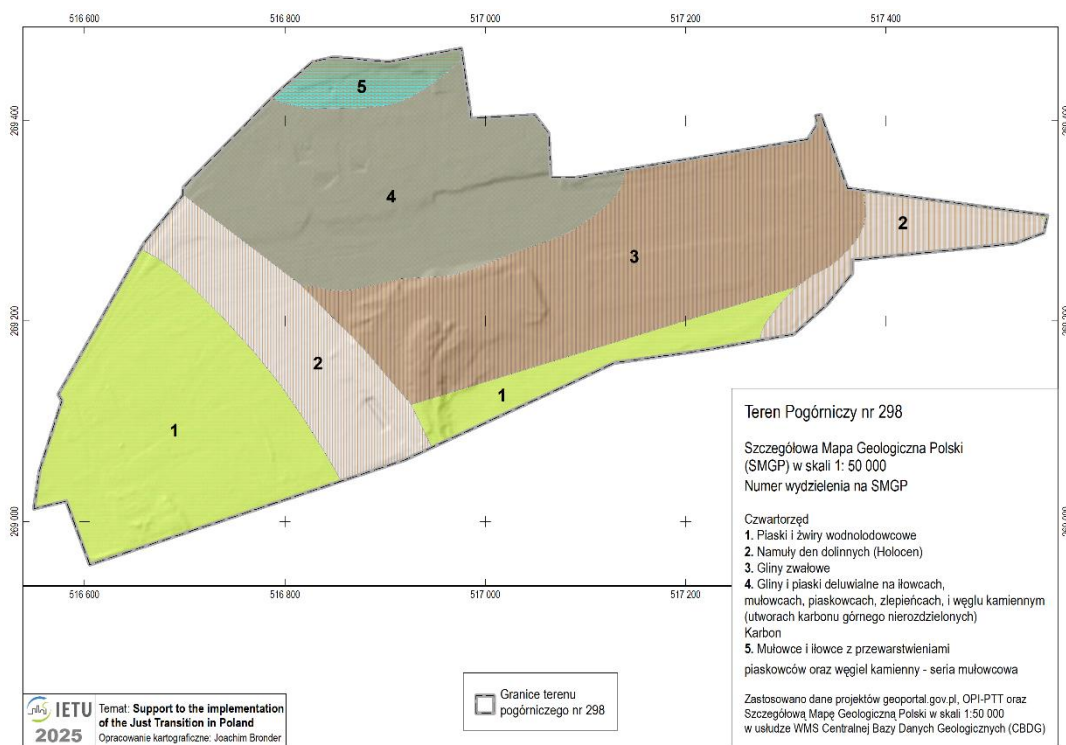
Map 10 Post-mining area No. 298: Trees on the post-mining area



Map 11 Post-mining area No. 298: Kazimierz OdNowa project area



Map 12 Post-mining area No. 298: Transport system



Map 13 Post-mining area No. 298: Geological map

Annex 6. The survey questions

Question content	Type of response
1. Which municipality do you represent?	Drop-down list of 64 municipalities.
<p>2. Please indicate the post-mining area (belonging to SRK) or active mining area located in your municipality that poses the greatest development challenge.</p> <p>Please provide the exact location or plot number in the OPI TPP 2.0 database. Post-mining areas belonging directly to the municipality are not included in the survey. Please indicate areas located in your area but managed by SRK or other State Treasury entities.</p> <p>Access to the OPI database is only available to registered users. To do so, please log in to your account or register in the system.</p>	Open question, text with answer.
<p>3. Do any of the issues mentioned seem crucial in the context of this area?</p> <p>Please describe key issues other than those mentioned in question 3.</p>	<p>Closed question, with the option to select or add another issue:</p> <ul style="list-style-type: none"> • Complex legal situation • Uncontrolled vegetation growth • Difficulty in obtaining funding due to the "polluter pays" principle • Difficulty in developing the site so that it can provide nature-based benefits, such as improved air quality or the creation of recreational areas • Other (please describe in detail in the box below)
<p>4. Are there any entities interested in developing this land? If so, please specify which ones?</p>	<p>Checkbox list and text when YES is selected.</p> <ul style="list-style-type: none"> • YES • NO
<p>5. Are there currently any development options being considered for the land? If so, what are they? Please list other development options.</p>	<p>Closed, with the option to select or add another option:</p> <ul style="list-style-type: none"> • No options under consideration • Recreational parks • Urban green areas • Sports facilities • Housing • Industry and infrastructure

	<ul style="list-style-type: none"> • Other (please specify in the box below)
<p>6. Would you like to cooperate with us in the next stage of the project "Support for the implementation of a just transition in Poland", which will consist in developing systemic solutions and/or an action plan for the development of five post-mining areas? What kind of cooperation would you be interested in?</p>	<p>Closed, with the option to specify the type of cooperation (development of systemic solutions, development of an action plan for the development of five post-mining areas)</p> <ul style="list-style-type: none"> • YES • YES, BUT • NO



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