

**Dear Residents of the Kleszczów Municipality,  
Dear Representatives of the Local Government,**

As the investor planning the development of a state-of-the-art small-scale combined heat and power (CHP) plant powered by alternative RDF fuel, Portonovo would like to present its position regarding the draft of the local spatial development plan currently under review, as well as highlight the environmental and economic significance of the planned project for the municipality.

The proposed facility aligns with the principles of sustainable waste management and energy transition. It will utilize RDF (Refuse-Derived Fuel – processed waste used as an alternative energy source). The technology employed excludes the storage or sorting of municipal waste on-site. The tightly sealed RDF containers will be used directly for energy production. Due to the project's scale, we do not anticipate a significant increase in delivery traffic – our simulations indicate approximately 3–4 vehicles per hour, which should not pose a nuisance to residents, particularly as the facility will be located away from residential areas.

The installation will not process hazardous waste and is designed as a facility meeting the highest environmental standards. The planned generator output – up to 19 MW – would be sufficient to supply electricity to as many as 45,000 households. This is particularly relevant in the Kleszczów Municipality, which currently lacks a central heating or CHP plant, with residents and businesses relying on dispersed, often less efficient and more polluting energy sources. As such, the investment can significantly contribute to enhancing the municipality's future energy independence.

We assure you that the installation will be designed and built in full compliance with the strictest EU standards, including Best Available Techniques (BAT) conclusions under Directive 2010/75/EU of the European Parliament and the Council. These standards are considerably more stringent than current national regulations. With the implementation of advanced flue gas treatment systems and continuous emissions monitoring, the facility's environmental impact will be minimal. The modern technology employed will also eliminate unpleasant odors, and the investment will be entirely fire-safe.

The proposed development is planned on the so-called 5P area, which is currently designated for industrial use under the 2017 local spatial development plan. We are deeply concerned about the proposed amendments, which would, in practice, prohibit the location of the modern installation described above – almost exclusively on the site of our planned investment. Such provisions pose a significant regulatory risk, undermine the stability of the investment process, and violate the principle of equal treatment of business entities. Meanwhile, other areas covered by the new spatial development plan (such as 14P and 16P) still permit the expansion of waste processing plants operated by Polymer Energy and Maya Victoria, despite these facilities using technologies significantly less advanced in terms of environmental standards than the one we propose.

It is worth emphasizing that Waste-to-Energy (WtE) facilities – or Thermal Waste Treatment Installations (ITPOs) – are widely implemented across Europe, with over 500 such facilities in operation, and are a key component in achieving EU targets to reduce municipal waste landfilling. Unlike traditional WtE plants, however, our facility will not process municipal waste into RDF, but instead will produce electricity from pre-contracted, ready-to-use alternative fuel.

The planned investment will also bring tangible social and economic benefits, including the creation of 50 to 90 new jobs and significant tax revenues for the municipality. With an estimated budget of approximately PLN 600 million (net), the Portonovo project is expected to generate several million PLN annually in property tax revenues for the municipal budget.

We believe that the evaluation of this investment should be based on factual and accurate information. This is a modern solution that bears no resemblance to outdated incineration plants from the 1990s. We appeal for this distinction to be recognized and for the project not to be associated with so-called “old waste incinerators” when shaping the provisions of the new spatial development plan. We respectfully request the opportunity to carry out the investment on the 5P site under the current building height regulations. We are convinced that a modern RDF-based energy facility can become a safe, low-emission, and environmentally responsible component of Kleszczów’s development.

We remain fully open to dialogue and cooperation with residents and local authorities, and we are happy to answer any questions regarding this project.

**Respectfully,**

Antoni Adam Repa, Timothy James McKechnie  
*Portonovo Investors*

[www.energiadlakleszczowa.pl](http://www.energiadlakleszczowa.pl)

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