

AI Comes to Bełchatów

The residents' analysis of the proposed hyperscale data centre in Domiechowice

Prepared by the residents, for the residents of Domiechowice

AUGUST-SEPTEMBER 2026

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Independent citizen analysis. Not commissioned by the gmina, the investor, or any pressure group. Each claim carries a credibility tier ([TIER A-D]). Full bibliography at the end of the report.

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The residents' analysis of the proposed hyperscale data centre in Domiechowice

Subtitle: The residents' analysis for the MPZP public consultation (objections due 28 August 2026).

Prepared by the residents, for the residents of Domiechowice village (*sołectwo Domiechowice, Gmina Bełchatów* — the rural gmina) — i.e. people who live **inside the MPZP plan area**, with **direct standing** to file *uwagi* (art. 8i ust. 1 pkt 1 in connection with art. 17 pkt 11 and 13 u.p.z.p.) and, as property owners whose legal interests are affected, to bring any future *skarga do WSA* under art. 101 ust. 1 u.s.g. in conjunction with art. 3 § 2 pkt 5 PPSA.

***Administrative distinction — important. Gmina Bełchatów** (the rural gmina, governed by **Wójt Dr Konrad Koc**; seat at *Urząd Gminy Bełchatów, ul. Kościuszki 13*) and **Miasto Bełchatów** (the town, a separate municipality governed by the **Prezydent Miasta Bełchatowa**) are two distinct units of local self-government. The Domiechowice site, the draft MPZP, and the 13 August 2026 consultation all sit in **Gmina Bełchatów** and are run by the Wójt. The town is an **affected neighbour by proximity** (the site is close to the town boundary and to Bełchatów town's district-heating network), but the town's authorities are **not** the deciding body for this MPZP. Where this report refers to "the gmina", it means Gmina Bełchatów (rural); where it refers to "Bełchatów town" / "Miasto Bełchatów", it means the separate urban municipality.*

Date: August–September 2026. · **Version:** 1.8 (2 Sep 2026)

Disclaimer. This is an *independent citizen analysis*. It is not commissioned by the gmina (municipal office), the investor, or any pressure group. It is built on public sources: Polish government BIP documents, the gmina's own draft *Miejscowy Plan Zagospodarowania Przestrzennego* (MPZP, Local Spatial Development Plan) and its *Prognoza oddziaływania na środowisko* (Strategic Environmental Assessment forecast, hereafter "prognoza"), the Polish KRS company registry, EU and WHO authoritative references, and reputable Polish and international press. Every claim carries a tier tag ([A] most authoritative → [D] local press / unverified) so the reader can see, line by line, how much weight any given assertion can bear. Where evidence is missing, the text says so. Where the gmina's statements contradict each other or the registry record, the contradiction is reported, not resolved by assumption.

How this analysis was made. Residents prepared this document with the help of AI language tools, which assisted with searching, comparing and summarising sources. The direction of the analysis, the choice of facts and the conclusions are the residents'; every claim carries a source tag (TIER A–D) and our own calculations are marked [COMPUTED] — so every fact can be checked against the source list. Despite careful verification, errors are possible; the source list lets you double-check every figure and quotation yourself.

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Executive Summary — framing

Scope. This report concerns the proposed hyperscale AI data-centre campus in the *strefa gospodarcza* (economic zone) of Domiechowice, Gmina Bełchatów, Łódzkie voivodeship, Poland. The project is announced for Phase 1 at **500 MW** of IT-load grid connection (with **~1 GW** total target), on a site of **~50 hectares** ¹ Urząd Gminy Bełchatów, Feb 2026; first-facility operation is targeted for 2029 and build-out through 2034 ¹⁰² ebelchatow.pl, 2 Apr 2026 ¹⁰⁴ baxtel.com

How to use this report. Chapters 2–3 establish what the project physically is and who is behind it. Chapters 4–5 cover power and environmental risks. Chapter 6 sets out the legal framework and your recourse. Chapter 7 walks claimed benefits against evidence; Chapter 8 puts Bełchatów in international context. **The full set of questions for the Wójt and the projektant is in the separate companion document «Belchatow_Questions_EN.pdf».** Chapter 9 is the action section, with templates.

The live consultation window — act now. Formal public consultation on the draft MPZP is **open from 31 July to 28 August 2026** ² Urząd Gminy Bełchatów. Written comments (*uwagi*) by paper or e-mail to sekretariat@ugbelchatow.pl (Urząd Gminy Bełchatów, ul. Kościuszki 13, 97-400 Bełchatów). The deciding authority is the Wójt Gminy Bełchatów, Dr Konrad Koc.

The open community meeting was held **13 August 2026 at 16:00**, Urząd Gminy Bełchatów (room 32), followed by a *dyżur projektanta* (designer's duty hour) 17:00–18:00 ². Special-needs participation had to be registered by 7 August 2026.

Why this timing matters. The draft MPZP is the **first and most consequential** public-planning moment at which binding site-specific conditions — noise ceilings, water-draw caps, cooling-technology mandates, waste-heat-reuse obligations, EMF limits, PUE/WUE targets — could be written into the local plan. **It is not the only one:** the later *decyzja o środowiskowych uwarunkowaniach* (environmental decision, DŚU — as a rule issued by the **Wójt**, and by **RDOŚ** when bundled in one application with a catalogue undertaking; §6.3) also has a mandatory public-participation stage (art. 79 ust. 1 of the ustawa z 3 X 2008 r. o udostępnianiu informacji o środowisku — Dz.U. 2026 poz. 670), but the DŚU's scope is narrower (focused on environmental impact, not land-use conditions) and the bar for resident input is higher. So the MPZP stage is **where leverage is highest**; the DŚU is a second bite, not an equivalent one. Chapter 6 develops this.

Executive Summary — findings

Three risks dominate the public record. Each is fixable only while the MPZP consultation is live.

1. The registry investor has no proven hyperscale track record, and the gmina's named lead investor is absent from the registry. The project vehicle DATA CENTER BEŁCHATÓW Sp. z o.o. (KRS 0000882677, share capital 8 000 PLN, as of August 2026) lists two shareholders: NEXT DC Sp. z o.o. (KRS 0001191076, incorporated 8 Sep 2025; 4 100 PLN revenue and a –48 900 PLN net loss in 2025), and EXUS DIGITAL LDA (Portugal) ¹⁰⁸. NEXT DC Sp. z o.o. is **not** the Australian-listed NEXTDC Limited (ASX: NXT). A negative search across Polish, Portuguese, Spanish, UK and EU-wide registries and Tier-A/B business press located **no operating hyperscale facility** built, owned or operated by any of these entities, by TerraByte Data Centers (UK, 2024), or by Afonso Salema (CEO of Exus Digital since Feb 2026, who resigned as Start Campus Sines CEO in November 2023 while under active *arguido* status in Portugal's Operação Influencer; the case was still open as of September 2025)

[A/B/C · NEGATIVE-SEARCH VERDICT]. The gmina separately told Onet in June 2026 that "the main investor" is Partners Group Holding AG ¹⁰⁰. Partners Group has a genuine hyperscale track record (atNorth, EdgeCore, GreenSquareDC) [B/C], but **does not appear anywhere in the Polish KRS for this SPV** and has made **no public disclosure** of any Bełchatów investment as of 10 August 2026 ⁹⁴. Three named entities in the press; two in the KRS; two overlap (Exus Digital confirmed; Next Mobile plausibly). The vehicle acquiring the ~50 ha of land is **BLUENEXT ENERGY Sp. z o.o.** (KRS 0001204596), another NEXT-cluster micro-shell with the same five shareholders, per a written purchase offer received by a Domiechowice landowner; land is thus banked in a *separate* shell from the project SPV (§2.4.3) ¹²¹. Since 24 August 2026 the gmina has been running an investor co-produced "myth-debunking" post series; fact-checking of the first post ("Myth #1") against the registries surfaces two contradictions and a structural non-denial — §2.4.8. The series' second post ("Myth #2", water, 25 August 2026) debunks an engineering-accurate order of magnitude (evaporative cooling at 500 MW = 1 400–21 600 m³/day per AWS/Microsoft/LBNL reports) with a promise of "50 m³/day, none for cooling" — a figure sourced to no document, contradicting the gmina's own earlier closed-loop-with-emergency-rainwater-cooling description and the Ministry's statement that no water data was ever presented; §2.4.9. Full analysis of the qualification regulation Dz.U. 2019 poz. 1839 (referenced in communications via the formula about a "predicted environmental qualification of the undertaking with its installations and the resulting investor obligations") — §6.3: the undertaking qualifies not only via the 1 ha industrial-footprint threshold (§3.1 item 54) but **through the installations themselves** (standby gensets ≥25 MW thermal input — item 4; wells — items 73–74; industrial wastewater treatment with no threshold — item 80), phasing cannot evade screening (aggregation clauses §3 ust. 2 pkt 2–3), and the DŚU will as a rule be issued by the **Wójt**, not RDOŚ (art. 75 uioś) — subject to RDOŚ's binding agreement.

2. The draft MPZP permits data centres but locks in no operating limits. Sections §11(2) and §28(1)(d) explicitly permit "*centra przetwarzania danych (data center)*" [A · MPZP]. The plan writes in **no noise dB ceiling, no water-draw cap, no PUE/WUE target, no EMF limit, no waste-heat reuse mandate, no battery-storage limit, no screening requirement, no decommissioning bond** [A · §11, §20, §22, §28]. The only operating rule (§11(4)) defers to generic environmental-quality standards outside the investor's property line. Once adopted, substantive limits shift to the later environmental decision (as a rule issued by the Wójt — §6.3), where consultation rights are narrower. **The leverage window is now.**

3. The gmina's environmental forecast ignores the neighbouring lignite plant and mine entirely. The 1 841-line prognoza (single author Łukasz Beń, signed 28 July 2026), sited 5–15 km from Europe's largest lignite power station, returns **zero hits** on "Elektrownia", "Bełchatów Power", "kopalnia", "węgiel", "lignit", "KWB", "PGE", "EU ETS", or "CO₂". The cumulative-impact analysis covers only traffic on droga krajowa nr 74 [A · §11.10]. The document is also silent on operational CO₂ (a 1 GW campus at Polish grid intensity would correspond to **5.3–6.1 Mt CO₂/yr** [COMPUTED - UNVERIFIED pending capacity-factor disclosure]), on standby-diesel emissions in an air-shed already in PM10 klasa C non-attainment, on EU EED Art. 26(6) waste-heat-reuse obligations, and on the KWB Bełchatów mine's regional aquifer drawdown — the same aquifer the DC may legally pump under §20 [UNVERIFIED - aquifer identity requires a hydrogeological model; see §5.3(b)].

The opportunity framing. Bełchatów is a genuine post-coal transition candidate. Grid, road, rail and water infrastructure exist; the lignite plant retires 2030–2036 under PGE's published Territorial Just Transition Plan; PGE has begun preliminary work on a second large nuclear station at the same site (not before ~2040). A hyperscale campus built under binding conditions — noise, water, PUE/WUE, waste-

heat reuse, decommissioning bond, named anchor tenant, firm clean-power contract — could anchor "Belchatów 2.0" without exporting environmental cost. Those conditions are writeable **only during the consultation that closes 28 August 2026**.

Act by 28 August 2026. File *uwagi* (templates in §9.2). FOI the RDOŚ + PPIS scoping letters (§9.2.2). Use the questions in the separate Questions sheet («Belchatow_Questions_EN.pdf») — in correspondence with the Urząd and in your own *uwagi* (the open meeting was held 13 August, 16:00).

Chapter 2 — The Bełchatów Project at a Glance

2.1 What and where

The proposed site is in the village of **Domiechowice** (*część obrębu Domiechowice*), in **Gmina Bełchatów**, powiat bełchatowski, województwo łódzkie [A · DRAFT MPZP, UZASADNIENIE, DRAFT MPZP UCHWAŁA (PUBLIC BIP URL BELOW)]. Approximate coordinates: 19.31°E, 51.38°N¹⁰⁴ baxtel.com.

The site covers ~**50 hectares** (press range: "*ponad 50 ha*" / "*około 50 hektarów*") [A · + MULTIPLE]. It borders directly on **droga krajowa nr 74** (national road 74) on one side and on **grunty leśne Skarbu Państwa** (State Forest lands) on another [A · MPZP UZASADNIENIE]. Today the land is "*występują grunty rolne, niezagospodarowane*" — agricultural and undeveloped; "*W sąsiedztwie terenu opracowania nie występuje żadna zabudowa*" — no neighbouring buildings [A · §2]. Soils are class IV, V and VI (poor-to-average agricultural suitability) on glacial tills and eolian sands, in the **Wysoczyzna Bełchatowska** physiographic region [A · §3-§4].

The site has **no prior MPZP**; under the *plan ogólny gminy Bełchatów* it is designated **SP** — **strefa gospodarcza** (economic zone) [A · MPZP UZASADNIENIE]. The draft plan now under consultation zones it **P-U-I** (*tereny zabudowy produkcji, usług oraz infrastruktury technicznej*) [A · §7]. The draft plan **does explicitly name the use**: §11(2) and §28(1)(d) both literally permit "*centra przetwarzania danych (data center)*" [A · DRAFT MPZP UCHWAŁA (LINES 144-145 = §11(2); LINE 309 = §28(1)(d))].

***Due-diligence note — the plan ogólny gminy Bełchatów.** Under the 2023 planning reform (ustawa o planowaniu i zagospodarowaniu przestrzennym), every MPZP must be **consistent** with the gmina's plan ogólny (the new mandatory gmina-wide zoning document that replaces the old studium uwarunkowań). The MPZP for Domiechowice is no exception. As part of your due diligence, **verify the plan ogólny's adoption status, its provisions for the Domiechowice economic zone, and whether its own adoption procedure was procedurally contested** — a procedurally flawed plan ogólny could be a basis for challenging an MPZP that depends on it. [UNVERIFIED - verify with the gmina / your lawyer] The specifics of any controversy around the plan ogólny's adoption (date, extraordinary session, resident objections) were **not independently verified** in this research pass and are not asserted here; ask the gmina in writing for the adoption date and the BIP record.*

Land tenure: per local press, "*Na tym etapie wszystkie działki w wyznaczonym obszarze znajdują się już w gestii inwestora, który posiada podpisane umowy przedwstępne. Przeniesienie własności ma nastąpić po zakończeniu procedur planistycznych...*" — all parcels are under preliminary contracts; ownership transfers after the planning process completes¹⁰² ebelchatow.pl, 2 Apr 2026. The entity signing for the land is **BLUENEXT ENERGY Sp. z o.o.** (KRS 0001204596), a NEXT-cluster micro-shell, per a written purchase offer received by a Domiechowice landowner¹²¹; full profile and implications in §2.4.3.

The DŚU application of 22.12.2025 covers **71 cadastral plots** in Domiechowice¹⁷²; the document itself gives neither the obręb (registration area) nor plot areas.

2.2 Scale

- **Phase 1: 500 MW** of IT-load grid connection, with *warunki przyłączeniowe* (connection conditions) reportedly secured ¹ wójt via ugbelchatow.pl, Feb 2026.
- **Total target: ~1 GW**, in two phases of 500 MW each ¹⁰² ebelchatow.pl.
- **First facility targeted for 2029**, with an expansion roadmap through **2034** ¹⁰⁴ same; baxtel.com.
- The campus is self-described as the *"largest data center in this part of Europe"* / *"one of the largest in Central-Eastern Europe"* ^{2 · 101}.
- **Number of halls, floor area in m², number of server racks: NOT STATED in any source.** This is a genuine disclosure gap, not a research failure (see the separate Questions sheet).
- For orientation: the entire Polish data-centre market reached **~250 MW in 2025** (PwC/PZCD; PSE assumes 200 MW in 2024), and market forecasts (JLL, PMR) see **~1.2 GW in 2030–2034** ⁸⁷; the draft PSE *Plan Rozwoju Sieci Przesyłowej* (Transmission Network Development Plan, PRSP) for 2027–2036 (April 2026) assumes **~3.1 GW in 2036** and **~5.0 GW in 2040** (SWS weather scenario) — 17.4 / 29.4 TWh per year, against national consumption of ~260 TWh in 2040 ¹⁶⁹. The Belchatów campus alone would be roughly **83 % of the market 1.2 GW scenario (2030) at full ~1 GW build-out** (≈40 % at the 500 MW Phase-1 level) ⁸⁷ knews.pl citing PZCD/PwC — or ~20 % of PSE's 2040 planning scenario (~32 % of the 2036 one) ¹⁶⁹.

2.3 Timeline

Date	Event	Source tier
2021-02-08	DATA CENTER BELCHATÓW Sp. z o.o. registered in the Polish KRS	⁷ KRS 0000882677
2024	Investor began grid-connection application; subsidy applications filed	^{2 · 103}
2025-09-25	Rada Gminy Belchatów Uchwała nr XXI/169/2025 — decision to draft the MPZP	[A · MPZP]
2025-10-27	NEXT DC Sp. z o.o. enters as shareholder of DC Belchatów Sp. z o.o.	⁹ Rejestr.io
2025-12-22	Investor's (Data Center Belchatów Sp. z o.o.) application for an environmental decision (DŚU); received 23.12.2025; proceeding opened — notice 05.01.2026 (file ref ZŚ.6220.23.2025)	¹⁷² UG inter-session information
2026-02-13	Wójt + Rada reps meet Wojewoda + Marszałek + Starosta at ŁUW in Łódź	²
2026-04-02	500 MW connection confirmed; environmental decision in progress (environmental proceeding confirmed ¹⁷²); four bypass roundabouts designed	¹⁰²
2026-05-14	Wójt's <i>postanowienie</i> (order): full scope of the OOS report determined	¹⁷² UG inter-session information
2026-05-27	Wójt's <i>postanowienie</i> (order): proceeding suspended pending submission of the OOS report	¹⁷² UG inter-session information
2026-06-09	Last KRS change at DC Belchatów Sp. z o.o.	⁸

2026-07-31	Public consultation on draft MPZP opens	2
2026-08-13, 16:00	Open community meeting, Urząd Gminy Bełchatów (room 32)	2
2026-08-13, 17:00–18:00	Designer duty hour (<i>dyżur projektanta</i>)	2
2026-08-28	Deadline for formal <i>uwagi</i> to the Wójt	2
2026-08-31 / 09-01	The "Data Center Bełchatów project team" announces a "cycle of open information meetings" (FB 31 Aug, 14:47); first duty hour: 1 September, 17:00–19:00, CSiR community hall in Emilin — the fourth cooling description (§2.4.17)	202
2029	Target for first facility operational	[D]
2034	Expansion horizon	104

The SPV was set up in **February 2021** — more than four years before the MPZP procedure formally began, and roughly five years before the public consultation opened. The corporate vehicle has been waiting for the planning vehicle to catch up.

2.4 Who is the investor? — a deliberately negative search

This is the most consequential question in the entire project, and the evidence does not allow a clean answer. The honest approach is to report what the public record *shows*, what the gmina *says*, where the two diverge — and to set the Polish SPV inside the wider Polish corporate network it now appears to belong to.

2.4.1 What the Polish registry (*KRS*) actually shows — and what the Portuguese registry adds

The project vehicle is **DATA CENTER BEŁCHATÓW SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ** (KRS 0000882677; NIP 7272847949; REGON 388121941), registered 8 February 2021 at ul. Wincentego Rzymowskiego 31, 02-697 Warszawa, with **share capital of 8 000 PLN** ($\approx$ €1 860 at $\sim$ 4.3 PLN/EUR) — a minimum-stamp Special-Purpose Vehicle (SPV) ⁸ KRS via krs-pobierz.pl and Rejestr.io. It has **two shareholders** ⁸:

1. **NEXT DC SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ** (KRS 0001191076) — entered the cap table on **27 October 2025**. NEXT DC Sp. z o.o. was itself incorporated on **8 September 2025**, only seven weeks before it became a shareholder of the project SPV. It has share capital of 6 250 PLN (as of August 2026) and five individual Polish shareholders plus the *Kozłowski Family Foundation*; its 2025 financials show **4 100 PLN of revenue and a net loss of –48 900 PLN** ⁹ Rejestr.io.
- **NEXT DC Sp. z o.o. is NOT the Australian-listed NEXTDC Limited (ASX: NXT)**, the Brisbane-headquartered operator of $\sim$ 28 Australian data centres. They are unrelated entities sharing a coincidental name; there is no public statement from NEXTDC Limited of any Polish subsidiary or Bełchatów involvement ⁹⁵ nextdc.com ⁹⁶ Wikipedia. Confusion with the Australian operator is ruled out.
- The individuals listed in NEXT DC's KRS (**Piotr Sulik, Paweł Szczech**, plus the *Kozłowski Family Foundation*) reappear across a wider Polish corporate network — see §2.4.3 ¹⁰⁸.

2. EXUS DIGITAL, UNIPESSOAL LDA — a Portuguese single-member limited company (*Unipessoal Lda* = a *Limitada* with a sole quota-holder). The Portuguese-registry aggregator record (Rigorbiz / Iberinform, mirroring the Portuguese commercial registry *Registo Nacional de Pessoas Coletivas*) confirms ¹⁰⁶ Rigorbiz / Iberinform:

- **NIPC: 518894541**
- **Legal name: EXUS DIGITAL, UNIPESSOAL LDA**
- **Share capital: €200** (two hundred euros)
- **Incorporated: 16 July 2025** — i.e. ~3 weeks before it entered NEXT DC's cap table (NEXT DC: 8 Sep 2025) and ~3 months before it entered DC Belchatów's cap table (27 Oct 2025).
- **Status: *Ativa* (active); *Sem contas apresentadas* — no accounts filed** as of 10 August 2026.
- **CAE 71120** (*Atividades de engenharia e técnicas afins* — engineering & technical activities).
- **Corporate purpose (objeto social):** "operação e manutenção de projetos de data centers [...] detenção, gestão e operação de ativos de data centers, incluindo sistemas de energia e refrigeração, fibra e telecomunicações" — i.e. DC operation & maintenance, and holding/managing DC assets including power, cooling, fibre and telecoms. DC-focused on paper.
- **Registered office:** Avenida Eng. Duarte Pacheco, Torre 1, 12^o piso, Sala 1, 1070-101 Lisboa — a serviced-office/corporate-tower complex (Torre Duarte Pacheco, central Lisbon), flagged as a likely virtual/serviced office. **The same Torre Duarte Pacheco (piso 16, 1070-102 Lisboa) is also the listed address of *Exus Renewables*** — the Spanish-branded "Exus" group entity (Madrid, Exus Management Renewables SL) for which **Paweł Szawłowski** (DC Belchatów board member, Group A) signs as "Country Manager for Poland" ¹¹¹ Exus Renewables press / LinkedIn, Jan 2026. This shared address links the Portuguese micro-entity to the wider international "Exus" brand on the ground, beyond just the name.
- **Sole quota-holder:** *Unipessoal* = single-member; the identity of the sole quota-holder is **not disclosed in the free-aggregator registry** and is [UNVERIFIED - the field sits behind the paid Portal da Justiça extract]. **Afonso Salema is CEO since February 2026** per his LinkedIn [B/C · LINKEDIN]; whether he is also the sole quota-holder is [UNVERIFIED].

Brand-vs-entity warning. The "Exus" name is shared by **at least four legally separate entities**, only one of which is the SPV shareholder:

- **EXUS DIGITAL, UNIPESSOAL LDA** (Portugal, NIPC 518894541) — **the SPV shareholder.**
- **EXUS SOFTWARE LTD** (UK, company no. 07932357) ¹⁰⁷ UK Companies House — a separate UK software company; **NOT the SPV shareholder.**
- **Exus Management Renewables SL** (Madrid), operator of the "Exus Renewables" brand — a separate Spanish renewables-management company for which Paweł Szawłowski works as Poland Country Manager ¹¹¹; **NOT the SPV shareholder.**
- **EXUS POLAND** — a Polish "EXUS" entity in the SPV's rejestr.io network (§2.4.3), separate from the Portuguese EXUS DIGITAL; [UNVERIFIED - KRS not retrieved in this pass].

The common "Exus" brand therefore ties together at least four corporate persons across four jurisdictions. Which of them actually commits capital to the Belchatów SPV — and through what contractual chain — is one of the questions for the Wójt (Q1 in the separate Questions sheet).

The board (*zarząd*) of the SPV uses a two-tier representation rule (any binding act needs one Group-A and one Group-B signature): Group A — **Paweł Dominik Szawłowski** and **Rhett Weiss** (a US national); Group B — **Sławomir Sklinda** and **Zbigniew Krzysztof Gawrych** ⁸. Sklinda and Gawrych also sit on the NEXT DC Sp. z o.o. board ¹⁰⁸. **Szawłowski** reappears across the wider NEXT/GLOBITEL network and at Exus Renewables (§2.4.3); **Gawrych** is named in 8+ Polish entities in the same network ¹⁰⁸.

2.4.2 What the gmina told Onet — and the discrepancy

In a written response to Onet (Maciej Kałach, 15 June 2026), the gmina named a different investor structure than the KRS shows. The gmina's written reply stated, verbatim: *"Głównym jest **Partners Group Holding AG**, przy wsparciu Exus Digital i Next Mobile"* — *"The main one is Partners Group Holding AG, supported by Exus Digital and Next Mobile."* ¹⁰⁰ Onet.

This is a **material discrepancy**:

- **Partners Group Holding AG** — the Swiss global private-markets firm (US\$185 bn AUM in 2025, SIX-listed, SMI constituent) — is **the only entity named by the gmina with a genuine, independently verifiable hyperscale track record** (atNorth in the Nordics, sold February 2026 at EV ~\$4 bn; EdgeCore in Colorado; GreenSquareDC in Australia; Digital Halo in Singapore) ⁸⁸ Wikipedia ⁹⁴ partnersgroup.com press archive. **Partners Group does NOT appear as a shareholder in the Polish KRS for DATA CENTER BEŁCHATÓW Sp. z o.o.** (only NEXT DC + EXUS DIGITAL do), and Partners Group has made **no public disclosure of any Belchatów investment** as of 10 August 2026 ⁹⁴. **Important context (not a red flag in itself)**: private-equity firms of this calibre routinely act through SPVs and holding-company chains (typically Luxembourg / Dutch / UK entities above the Polish SPV) and do **not** pre-disclose individual investments in portfolio cap tables until financial close or a regulatory disclosure trigger. So Partners Group's absence from the Polish KRS at this stage is **normal commercial practice for institutional PE**, not inherently suspicious. What genuinely deserves an answer is the **gap between the investor the gmina named publicly (Partners Group Holding AG) and the entities actually in the Polish registry (DATA CENTER BEŁCHATÓW ← NEXT DC Sp. z o.o. + EXUS DIGITAL, UNIPESOAL LDA)** — i.e. the gmina should reconcile the two on the record (Q1 in the separate Questions sheet).
- **"Next Mobile"** — the gmina's name does not match NEXT DC Sp. z o.o. (KRS). However, **NEXT MOBILE PROSTA SPÓŁKA AKCYJNA** (simple joint-stock company; KRS **0001084040**; NIP 7272820933; REGON 368809400; seat: ul. Łąkowa 3/5, 90-562 Łódź) is a real, separately-incorporated Polish mobile-messaging and telecom company, founded 2017 and formed on **3 June 2024** by the merger of several group telecommunications companies — explicitly including **GLOBITEL Sp. z o.o.** — into a single entity (per the company's own corporate-history page) ¹⁰⁹ Rejestr.io ¹¹⁰ nextmobile.pl. **"Next Mobile" is therefore plausibly identified as NEXT MOBILE P.S.A. (KRS 0001084040)** — a sister entity in the same Łódź-based telecom group as GLOBITEL — **NOT NEXT DC Sp. z o.o.** (KRS 0001191076). The gmina's wording remains **inconsistent with the Polish KRS for the SPV** (which shows NEXT DC, not NEXT MOBILE); [UNVERIFIED] whether the gmina mis-named NEXT DC, or whether NEXT MOBILE P.S.A. is also a (non-KRS-listed) participant. See §2.4.3 for the full network.
- **Exus Digital** — matches the KRS-listed EXUS DIGITAL, UNIPESOAL LDA (NIPC 518894541, §2.4.1).

Three named entities in Onet; only two in KRS; two of the three (Exus Digital and — plausibly — Next Mobile) overlap with real corporate persons in the wider Polish/Portuguese registry. The unresolved item is the gmina's "Partners Group Holding AG" as the **lead** investor — absent from every registry consulted. **The gap between the gmina's public statement and the registry record is itself the most important "seriousness" question to put to the Wójt — in writing by 28 August (the open meeting of 13 August has been held)** (Q1 in the separate Questions sheet) — not because PE silence is unusual (it isn't), but because the gmina should reconcile, on the record, which entity is actually the lead investor and on what timeline that will become publicly verifiable.

2.4.3 The wider Polish corporate network — an established telecom/energy group with TWO data-centre SPVs

The DC Belchatów SPV does not sit in isolation. The **rejestr.io connections graph** for KRS 0000882677 (DATA CENTER BELCHATÓW) shows a sizeable affiliated network whose central individuals overlap with the SPV's shareholders and board ¹⁰⁸ Rejestr.io connections graph. Web verification of the largest nodes:

- **GLOBITEL Sp. z o.o. — VERIFIED.** A real, operating Polish telecom/ICT operator headquartered in Łódź, founded 2007, registered with the Polish Electronic Communications Office (**UKE**) as a provider of telecommunications services, a **RIPE NCC** member (autonomous-system / IP resources), with a LinkedIn/Facebook presence under "Globitel — globalny dostawca informatyczny oferujący innowacyjne usługi operatorskie, telekomunikacyjne..." ¹¹² EMIS ¹¹⁵ UKE public telecom registry [B · RIPE NCC MEMBER LIST]. **GLOBITEL is a genuine operating company, not a shell.**
- **NEXT MOBILE PROSTA SPÓŁKA AKCYJNA** (KRS 0001084040) — **VERIFIED** (see §2.4.2). Real Polish mobile-messaging/telecom company (mass-SMS, call-tracking, B2B telco services); explicitly the post-2024-merger successor of GLOBITEL plus other group telecom assets ¹⁰⁹ · ¹¹⁰ nextmobile.pl. The NEXT MOBILE P.S.A. — GLOBITEL — NEXT DC cluster is a single Łódź-based telecom/ICT group whose shareholders and officers overlap with the DC Belchatów SPV.
- **NEXT DATA SERVICES Sp. z o.o.** (KRS 0001167273) — **VERIFIED.** Shareholders: **Piotr Sulik** (28 shares, since 16 Apr 2025), **Zbigniew Krzysztof Gawrych** (20 shares), and other named individuals overlapping with the DC Belchatów SPV; incorporated shortly before NEXT DC Sp. z o.o. ¹¹³ krsly.pl. A sister DC-services vehicle in the same network.
- **DATA CENTER STANISŁAWÓW Sp. z o.o.** (KRS 0001168621) — **VERIFIED as a second, separately-incorporated data-centre SPV in the same network.** Per krsly.pl the shareholders/controllers are **Piotr Sulik**, **Zbigniew Krzysztof Gawrych**, **Paweł Dariusz Szczeczek**, **Rafał Arkadiusz Kozłowski**, and **Sławomir Sklinda** — i.e. the same individuals who sit behind NEXT DC, NEXT DATA SERVICES and the DC Belchatów SPV board ¹¹⁴ krsly.pl. **The Belchatów DC is therefore NOT the only DC project in this group's pipeline.**
- **Q96 ENERGY Sp. z o.o.** (KRS 0001229410) and a cluster of energy-named entities (**GLOBITELL ENERGIA**, **BLUENEXT ENERGY**, **ENERGETYKA POLSKA**, **EP JAROSŁAW** / **EP MIESZKOWICE** / **EP JASZÓW**, **EW GREENFIELD 7 / 10**, **GPM 1** / **GPO 1** / **GPT 1**, **VCC PARTNER**, **BODOMED**, **CHORS 2**, **AMETIA**, **MEIDANA**, **WHITE DOT**, **GRAFARTI**, **ROSANINA**) are listed in the connections graph ¹⁰⁸. **ENERGETYKA POLSKA Sp. z o.o.** is verifiable as a real Polish electric-power company (incorporated 23 Sep 2004, per EMIS) ¹¹²; **Q96 ENERGY** is a verifiable Polish energy entity owned via

DATA CENTER STANISŁAWÓW ¹¹³. The remaining EP*/EW GREENFIELD*/GPM/GPO/GPT entities follow the naming convention of special-purpose vehicles for **renewable/energy projects** (operating solar/wind SPVs are typically registered this way in Poland). **Characterisation of the energy cluster as real operating assets (vs. shells)** [UNVERIFIED - verify via KRS individually]; the pattern is consistent with a **genuine energy/telecom group of the kind that has grown across Polish renewables in the past decade**. Additional web verification (10 Aug 2026, see §2.4.6): *Energetyka Polska* is the seller from which *Exus Renewables Europe* acquired a 1 056 MW Polish wind portfolio in July 2024 ¹¹⁸ Exus Renewables press release — i.e. **the cluster's Energetyka Polska node has a real, publicly-announced corporate-transaction link to the international "Exus" group**, materially strengthening (though not fully verifying) the §2.4.1/§2.4.6 brand-vs-entity link.

- **Central individuals** (Rejestr.io graph):
 - **Paweł Szawłowski** — on the DC Belchatów board (Group A) and named in 12+ companies in the network. Web confirmation: he is also **"Country Manager for Poland at Exus Renewables"** per Jan 2026 press releases (Energies Media; Exus Renewables; Global Switch renewable-supply announcement) ¹¹¹ Exus Renewables press. **Szawłowski straddles the Polish NEXT/GLOBITEL group and the international "Exus" brand**, making the brand-vs-entity question sharper (§2.4.1).
 - **Zbigniew Gawrych** — on the DC Belchatów board (Group B) and named in 8+ network entities ¹⁰⁸.
 - **Piotr Sulik + Paweł Szczech** — the two named individual NEXT DC shareholders; both reappear across NEXT DATA SERVICES, DATA CENTER STANISŁAWÓW and other DC/energy entities ¹¹³.
 - **Rhett Weiss** (US national, DC Belchatów board Group A) — [UNVERIFIED] whether he holds roles at other network entities.
- **EXUS POLAND** — a Polish "EXUS" entity in the connections graph, separate from the Portuguese EXUS DIGITAL, UNIPESSOAL LDA. [UNVERIFIED - KRS not retrieved in this pass; verify via KRS].

Network reading. The picture that emerges from the registry graph is that of a **real, established Polish telecom/energy group** (the NEXT/GLOBITEL/ENERGETYKA cluster — verified as operating companies with a telecom + energy footprint), running **at least two data-centre SPVs** (DC Belchatów + DC Stanisławów) and connected, via the individual **Paweł Szawłowski**, to the international "Exus" brand (Madrid Exus Management Renewables / Lisbon Exus Renewables / the Portuguese EXUS DIGITAL micro-shell). This is not a "two random shells with no track record" picture. It is, however, also not a picture of a hyperscale DC operator: the group's verifiable operating history is in **telecom (GLOBITEL/NEXT MOBILE) and energy/renewables** (Q96 ENERGY, ENERGETYKA POLSKA, the SPV-cluster naming pattern), **not in hyperscale data-centre construction or operation**.

BLUENEXT ENERGY — the land-acquisition vehicle. A written purchase offer received by a Domiechowice landowner names **BLUENEXT ENERGY Sp. z o.o.** (KRS 0001204596, NIP 5214141290, REGON 543274027) as the buying entity; the offer document is held by the residents ¹²¹. Its full profile (from the KRS record): incorporated **17 November 2025**, share capital **6 300 PLN**, registered at the group's shared Warsaw address (ul. Wincentego Rzymowskiego 31 — the same building as

NEXT DC, DATA CENTER STANISŁAWÓW, NEXT DATA SERVICES and the DC Bełchatów SPV), PKDs nominally covering gaseous-fuels production, natural-gas mining, electricity and construction, a **free Gmail contact address** filed in the KRS, and the **same five-shareholder NEXT constellation** as the other SPVs (Gawrych, Sklinda — Prezes, Szczech, Sulik, plus the Kozłowski Family Foundation, which entered 20 January 2026)¹⁰⁸. Two observations follow. First, the campus land is being banked in a **separate micro-shell from the project SPV** (DC Bełchatów) and the energy SPV (Q96) — a classic risk-insulation layer in which the land, the operating entity and the energy vehicle can each be financed, pledged or sold independently; the ~50 ha under preliminary contracts are headed toward Bluenext, not toward the entity the gmina's consultation materials treat as "the investor". Second, as of 17 August 2026 the KRS record for Bluenext still lists **no real-estate PKD (68.x)** — a company transacting farmland while declaring gas-mining and construction activity. The art. 36 ust. 4 planning fee (§6.1) attaches to the **sale** of the land within 5 years of the plan entering into force and is paid by the **seller** — since ownership is to pass to Bluenext only after the plan is adopted, the fee may fall on the selling landowners, and if Bluenext re-sells the land within that window, on Bluenext itself.

2.4.4 The track record — reported as a negative search

A thorough search of Polish, Portuguese, Spanish, UK and EU-wide registries, industry databases (DCD, DataCenterHawk, Baxtel) and Tier-A/B business press (Reuters, FT, Bloomberg, ECO, Público, Jornal de Negócios, Onet) found:

As of 10 August 2026, no public evidence of any hyperscale data-centre facility built, owned or operated by DATA CENTER BEŁCHATÓW Sp. z o.o., NEXT DC Sp. z o.o., EXUS DIGITAL UNIPESSOAL LDA, EXUS SOFTWARE LTD, Exus Management Renewables SL, TerraByte Data Centers, the wider NEXT/GLOBITEL/ENERGETYKA network, or Afonso Salema was located in any of those sources, nor in any Partners Group corporate disclosure. [A/B/C · NEGATIVE-SEARCH VERDICT]

What the record *does* show: **DC Bełchatów SPV** — minimum-stamp vehicle, no operating asset. **NEXT DC Sp. z o.o.** — newly-incorporated micro-entity, no hyperscale track record. **EXUS DIGITAL, UNIPESSOAL LDA** — newly-incorporated (16 Jul 2025) Portuguese single-member micro-entity (€200 capital), no accounts filed; DC-focused on paper, no operating DC asset. **EXUS SOFTWARE LTD / Exus Management Renewables SL / Exus Renewables** — separate entities sharing the "Exus" brand (§2.4.1); none is the SPV shareholder, and none has a publicly verifiable hyperscale operating record. **The NEXT/GLOBITEL/ENERGETYKA group** — verifiable track record in Polish telecom and energy, **not in hyperscale DCs**. **Afonso Salema** — led **Start Campus Sines** (Portugal, 495 MW, \$4.2 bn announced) as CEO, **resigned Nov 2023** when named *arguido* in **Operação Influencer** (the corruption investigation that contributed to the fall of PM António Costa's government)^{90; 91}. As of Sep 2025 the case "*continua sem fim à vista*" — open, no conviction, no acquittal⁹². Salema subsequently founded **TerraByte Data Centers** (UK, Sep 2024), claiming USD 1–1.5 bn raise; **no operating TerraByte facility or credible evidence of the raise was found**⁹⁰. Salema has been **CEO of EXUS DIGITAL UNIPESSOAL LDA since February 2026** per his LinkedIn [B/C · LINKEDIN]. **Partners Group Holding AG** — the only entity with a verifiable hyperscale track record; **NOT in the Polish KRS, silent publicly on Bełchatów**. The Ministry of Climate told Onet (Jun 2026) the investor has "*nie przedstawił informacji na temat skali oddziaływania [...] w tym wielkości*

zużycia wody oraz planowanego systemu chłodzenia" ¹⁰⁰. The 500 MW connection conditions are a **PSE technical-conditions document, not a supply contract**; no PPA, construction loan, EPC contract, anchor tenant or financial close has been publicly announced ^{2 · 100}. These matters are reported factually; Operação Influencer status is *open*, not adjudicated.

2.4.5 Reframed verdict — three layers, one sharp question

The picture is more nuanced than a flat "two shells, no track record". The project sits inside an **established Polish business group** (the NEXT/GLOBITEL/ENERGETYKA cluster — verified real operating companies with a telecom + energy footprint, including a second DC SPV, DATA CENTER STANISŁAWÓW KRS 0001168621), **BUT** the specific vehicle for THIS investment is a **two-layer micro-shell**:

- **Polish SPV**: DATA CENTER BELCHATÓW Sp. z o.o. — share capital **8 000 PLN** ($\approx$ €1 860 at ~4.3 PLN/EUR), KRS 0000882677 ⁸.
- $\leftarrow$ **owned by**: NEXT DC Sp. z o.o. (incorporated **8 Sep 2025**, share capital 6 250 PLN, revenue 4 100 PLN / net loss −48 900 PLN in 2025) ⁸ **AND** EXUS DIGITAL, UNIPESSOAL LDA (incorporated **16 Jul 2025**, share capital **€200**, no accounts filed) [B · PORTUGUESE REGISTRY AGGREGATOR].
- **AND** the gmina's publicly-named lead investor "**Partners Group Holding AG**" — a Swiss PE giant with a real hyperscale track record — **remains absent from every registry consulted** (Polish KRS, Portuguese RNPC, UK Companies House, Madrid mercantile registry) and has made **no public disclosure** of any Belchatów investment as of 10 August 2026 ^{100; 94}.
- **AND no hyperscale data-centre build/operating track record** could be located for the SPV, NEXT DC, EXUS DIGITAL, EXUS SOFTWARE, Exus Management Renewables, or their named principals; the wider group's verifiable track record is in **telecom (GLOBITEL/NEXT MOBILE) and energy (Q96 ENERGY / ENERGETYKA POLSKA / renewables SPVs)**, not hyperscale DC.

So the residents' sharp question is no longer just "*is the investor real?*" — the Polish group is real, on its own terms — but: "**which entity actually commits the ~€1 bn+ to build this — the Polish NEXT/GLOBITEL group, the new Portuguese €200 shell EXUS DIGITAL UNIPESSOAL LDA, or Partners Group Holding AG? And what is the documented contractual chain between them?**" That is the question to put to the Wójt — in writing by 28 August; the open meeting of 13 August has been held (Q1 in the separate Questions sheet). PE silence above the Polish SPV is normal; the *gmina-registry gap* on the named lead investor is not — and the gmina should reconcile it on the record.

2.4.6 The Partners Group ↔ Exus corporate link — a newly web-verified reframing of the gmina-registry gap

A targeted web verification (10 Aug 2026) of the largest network nodes materially reframes the §2.4.5 verdict. Two publicly-announced corporate transactions tie the gmina's three named investor entities (Partners Group, Exus Digital, Next Mobile) into a single corporate story, partially closing the gmina-registry gap that §2.4.5 reports:

1. **Partners Group → Exus — up to €1 bn growth-capital investment (4 October 2023).**
Partners Group Holding AG publicly announced an agreement to invest **up to €1 bn** of growth capital in **Exus Partners Holding** (the parent of the "Exus" group, including Exus Management Renewables SL, Madrid) — Baar-Zug, Switzerland, 4 October 2023 ¹¹⁶ Partners Group press release ¹¹⁷ PE Hub, 4 Oct 2023; Ropes & Gray (Partners Group's legal advisor, 4 Oct 2023); Cuatrecasas (Exus's legal advisor, 9 Oct 2023); renews.biz, 4 Oct 2023; IREI, 6 Oct 2023; Les Echos press-release wire. The investment was into Exus's renewables-asset-management and project-development arm, **not** a hyperscale-DC vehicle. **This means the gmina's "Partners Group Holding AG" and "Exus Digital" are not three uncoordinated PE-firm and brand names — they are tied by a real, publicly-announced €1 bn corporate investment.** The §2.4.5 framing that Partners Group "remains absent from every registry consulted" is **technically still true for the specific Bełchatów SPV** (Partners Group is not in the KRS for DATA CENTER BEŁCHATÓW Sp. z o.o.), **but the broader implication that the gmina's three names are uncoordinated is no longer supported by the public record.**
2. **Exus Renewables → Energetyka Polska — 1 056 MW Polish wind acquisition (July 2024).**
Exus Renewables Europe announced on 19 December 2024 that it had acquired, in July 2024, **a 1 056 MW seven-wind-farm portfolio in south and southwest Poland from Energetyka Polska** (a Polish renewables developer with 20+ years of wind-farm history, Kraków-based, founded 2004), plus a further 53 MW two-wind-farm portfolio in west-central Poland — **total ~1.2 GW of Polish wind pipeline acquired by the Exus group in 2024. Energetyka Polska is one of the named entities in the DC Bełchatów SPV's rejestr.io network (§2.4.3).** PwC Poland advised on both transactions; Exus publicly announced it had **"established a Polish subsidiary and a strong local team"** in connection with the acquisition ¹¹⁸ Exus Renewables press release, 19 Dec 2024 ¹¹⁷ green-forum.eu, 24 Dec 2024; Exus Renewables PPA-commissioning press release, Jan 2026. The "EXUS POLAND" entity in the SPV's rejestr.io network (§2.4.3, previously [UNVERIFIED - KRS not retrieved]) is, on balance, the "Polish subsidiary" Exus announced in December 2024; formal KRS confirmation is deferred but the corporate footprint is consistent.
3. **Paweł Szawłowski — the human bridge (already in §2.4.1, §2.4.3).** The DC Bełchatów board member (Group A) is concurrently **"Country Manager for Poland at Exus Renewables"** per Jan 2026 press releases ¹¹¹. With the §2.4.6(2) acquisition now web-verified, **Szawłowski's "Country Manager for Poland" role is tied to the concrete 1.2 GW Polish wind portfolio Exus bought from Energetyka Polska — i.e. the role is operational, not nominal. Szawłowski is therefore the human link between the Polish NEXT/GLOBITEL/ENERGETYKA network (§2.4.3), the international Partners-Group-backed Exus group (§2.4.6(1)–(2)), and the DC Bełchatów SPV board.**

The web-verified chain (consolidated).

Partners Group Holding AG (Swiss PE, \$185 bn AUM 2025) → [Oct 2023, up-to-€1 bn growth-capital investment] → Exus Partners Holding → Exus Management Renewables SL (Madrid) / Exus Renewables Europe brand → [July 2024, acquired 1 056 MW Polish wind from Energetyka Polska; Dec 2024 announced Polish subsidiary] → Paweł Szawłowski (Country Manager Poland, Exus Renewables; on DC Bełchatów board Group A) → DATA CENTER BEŁCHATÓW Sp. z o.o. (Polish SPV). The Portuguese EXUS DIGITAL UNIPESSOAL LDA (€200 micro-shell, the SPV shareholder) carries the "Exus" brand name and shares a Lisbon serviced-office address (Torre Duarte Pacheco) with "Exus Renewables" (§2.4.1), but is NOT publicly documented as a subsidiary of Exus Partners Holding / Exus Management Renewables SL [UNVERIFIED - corporate-chain link from Exus Partners Holding to EXUS DIGITAL UNIPESSOAL LDA not located in any public registry or press release as of 10 Aug 2026].

What this does NOT change.

- **No hyperscale-DC track record is added.** Partners Group's €1 bn Exus investment was into renewables asset management and project development — wind, solar, BESS, **not** hyperscale-DC construction or operation. Exus Renewables' verifiable track record is in renewable-energy assets (Google-PPA Spanish wind, March 2025; Lightsource bp Cibeles solar farm, Jan 2025; Masdar Portuguese wind stake, Feb 2026; Ingka asset-management mandate, Jul 2025)¹¹⁸, **not** in 500 MW–1 GW AI-campus development. The §2.4.4 negative-search verdict on hyperscale track record stands.
- **The Polish SPV is still a two-layer micro-shell** (DC Bełchatów 8 000 PLN ← NEXT DC incorp 8 Sep 2025 + EXUS DIGITAL €200 incorp 16 Jul 2025). The fact that a coherent wider corporate story now exists does not change the local-vehicle economics.
- **The specific corporate chain from Partners Group → Exus → EXUS DIGITAL UNIPESSOAL LDA → DC Bełchatów SPV is still not publicly documented.** The link from the Partners-Group-backed "Exus" brand family to the Portuguese €200 micro-shell is, on the public record, *associative* (shared brand name, shared Lisbon serviced-office address, the human bridge via Szawłowski), not *proven* (no press release, no registry extract documents EXUS DIGITAL UNIPESSOAL LDA as a subsidiary of Exus Partners Holding or Exus Management Renewables SL). See §2.4.7 for the Portuguese-registry picture.

Sharpened question. The §2.4.5 question — "*which entity actually commits the ~€1 bn+?*" — is sharpened by §2.4.6 into a more specific demand: "**is EXUS DIGITAL UNIPESSOAL LDA (NIPC 518894541) a subsidiary of Exus Partners Holding / Exus Management Renewables SL (the Exus group in which Partners Group invested up to €1 bn in October 2023), and if so, why does the chain run through a €200 Portuguese micro-shell rather than directly through Exus's Polish subsidiary (the one announced in December 2024)?**" This is the question for the gmina to put on the record (Q1 in the separate Questions sheet). PE silence above the SPV is normal; the **specific legal-vehicle choice** (a 3-week-old €200 Portuguese shell next to a 7-week-old 6 250 PLN Polish shell, both inserted as shareholders in October 2025 — two years *after* Partners Group's €1 bn Exus investment) is the part that deserves an on-the-record explanation.

2.4.7 The Portuguese side — a network graph from northdata (uncertain reliability)

The Portuguese-registry aggregator **northdata.de** publishes a dependency graph for EXUS DIGITAL, UNIPESSOAL LDA (NIPC 518894541) ^{119 · 119} northdata.de. The graph is **weaker than the Polish rejestr.io graph in §2.4.3** (commercial aggregator, not the primary registry) and adds a different angle on the Portuguese micro-entity:

- **Current links (per northdata):** the person **João Burnay Summavielle** and the company **Ed Setúbal Data Lda.** — a "Data" company in Setúbal (south of Lisbon, on the Sado estuary near Sines), possibly a sister data-centre project to whatever EXUS DIGITAL is intended to operate. [UNVERIFIED - Ed Setúbal Data Lda. is named in the northdata graph; its registry extract was not retrieved in this pass; flag for verification].
- **A former link** through a chain of name-changes / corporate successions: **Freshpanoply Lda.** → (current name) **Nao Victoria Lda.** → **Exuberant Skills Lda.** → the person **Luís Abreu Castello**, who in turn holds **Eólica do Sincelo SA + Eólica da Linha SA** (wind-energy companies — a Portuguese renewables heritage) + **Next Number — Sociedade de Mediação** (a brokerage). ¹¹⁹.
- **ABSENT from this graph:** Afonso Salema, **Exus Management Renewables SL** (Madrid), **EXUS SOFTWARE LTD** (UK), **TerraByte Data Centers**. The "Exus" brand link is therefore **associative, not proven corporate ownership** — the Portuguese micro-entity carries the "Exus" name but the northdata graph does not tie it to the Spanish / UK / Salema–TerraByte "Exus" constellation. Combined with §2.4.6, the picture is now: northdata does not see the Partners-Group-backed Exus group as a Portuguese-registry parent of EXUS DIGITAL; the §2.4.1 / §2.4.6 link runs through shared brand + a shared Lisbon serviced-office address + the Szawłowski human bridge — **not through a documented Portuguese-registry parent**.

Reading. Two substantive Portuguese leads emerge — **Ed Setúbal Data Lda.** as a possible sister DC project (geographic proximity to the Start Campus Sines hyperscale that Salema led until Nov 2023 is suggestive but [UNVERIFIED]), and a **Luís Abreu Castello → wind-energy chain** (Eólica do Sincelo, Eólica da Linha) that resonates with the Exus Renewables brand (now itself linked to the wider Partners-Group-backed group via §2.4.6). Both are leads to verify, not established ownership lines. The single most important limitation: **the northdata graph is an aggregator-derived dependency view, not the primary Portuguese registry**, and the names that would tie EXUS DIGITAL UNIPESSOAL LDA to the wider Partners-Group-backed "Exus" corporate family (Salema, Madrid Exus Management Renewables, UK Exus Software, TerraByte) are **not in it**. The Portuguese side of the registry evidence is therefore **thinner than the Polish side**: on the Polish side, an established operating group is verifiable (§2.4.3) plus a publicly-announced Partners Group → Exus → Energetyka Polska chain (§2.4.6); on the Portuguese side, a commercial-aggregator graph of two named persons and a chain of small firms, but no proven corporate lineage to the Partners-Group-backed "Exus" group. This asymmetry is itself material: a serious institutional investor committing ~€1 bn+ to a Polish hyperscale would normally leave a clearer Portuguese-registry footprint if the Portuguese vehicle were genuinely the operating-investment arm.

2.4.8 The "Myth #1" post (24 August 2026) — the gmina and the investor jointly "debunk myths"; a fact-check

In late August 2026 the Urząd Gminy Belchatów launched a Facebook series of "myth-debunking" posts about the project, produced — in the office's own words — "together with the investor". The first post frames the myth as: *"the Belchatów Hyperscale Data Center is fake, and the investor is a shell company"*, and answers with a  Facts section: the main investor is Partners Group ("managing capital of over

USD 185bn"); the deliverer will be Data Center Bełchatów Sp. z o.o. "created by Exus Digital Lda and Next Mobile PSA — companies active for years in data center development, telecom and cybersecurity"¹²².

An independent verification of every "Facts" claim against registries and primary sources (cross-model review: four analytical lenses + an adversary + a fact-checker; full analysis and protocols in «Belchatow_Mit1_PL.pdf») yields **a half-truth in which the unverifiable half carries the weight**:

What checks out (the honest half):

1. **The AUM figure is true and current** — Partners Group reports **USD 186 bn** AUM as of 30.06.2026 (184.9 bn at 31.12.2025)¹²³ Partners Group H1 2026 results. "Over USD 185bn" matches the latest report; the currency is correct.
2. **The PG → Exus → SPV corporate chain exists** (§2.4.6): the up-to-€1bn growth-capital investment into Exus Partners Holding (Oct 2023); EXUS DIGITAL LDA is an SPV shareholder at **60%** (96 of 160 shares), and Rhett Weiss (Exus Digital CDO) sits on the SPV board⁸ Rejestr.io.
3. **The project is not fiction** — the SPV, the MPZP procedure, voivode-level meetings (Feb 2026), and preliminary land contracts (§2.1–§2.3) are all real.

What does not check out — claim by claim:

Post claim	Registry / primary source	Verdict
"The main investor is Partners Group"	No PG entity appears in the SPV's KRS (shareholders: EXUS DIGITAL LDA 60% / NEXT DC 40%) ⁸ ; PG's press archive (FY2025 and H1 2026 results) names neither Bełchatów nor any Polish DC , and in the same H1 2026 release PG announces the sale of atNorth — exiting a comparable European DC platform ¹²³ ; DCD (26.02.2026): a "prospective" investor, project "in its early planning stages" ¹²⁶ ; the only public source of the "main investor" attribution is the gmina itself ¹⁰⁰ Onet	UNSUPPORTED — present tense "is" without a single public confirmation from PG itself
"Created by Exus Digital Lda and Next Mobile PSA"	Current KRS: EXUS DIGITAL LDA (60%) + NEXT DC Sp. z o.o. (40%) — not "Next Mobile P.S.A." ⁸ ; SPV share capital per the current record: 8 000 PLN (record amended 9 June 2026); FY2025: revenue ~1.5k PLN, loss ~162k PLN ⁸	CONTRADICTED IN DETAIL — the post misstates the checkable registry record and omits the SPV's capital/results
"Companies active for years in data center development, telecom and cybersecurity"	EXUS DIGITAL LDA: ~1 year old (registered 16 July 2025), share capital €200 ¹²⁴ eInforma; ¹²⁵ RADIUS; the Exus group's documented experience is in renewables (11 GW under management), not DC builds; PG itself describes Exus Digital as a newly "built" team ¹³⁰ PG LinkedIn. Next Mobile: ended consumer telecom services on 31.05.2022 ¹²⁷ mvno-gsm; today a mass-SMS/CPaaS firm, revenue PLN 49.6M (2024) ¹²⁸ aleo; zero data centres built ¹⁰⁴ Baxtel; "cybersecurity" = self-description only ¹¹⁰	CONTRADICTED — no registry or industry-database support for either company
"No equivalent in our part of Europe" (preamble)	The 3.2 GW Lublewo campus announced March 2026 with grid connection conditions — "the largest project of its kind in Poland and one of the largest in Europe" ¹²⁹ ; Konin 260 MW / €3bn; Hillwood 130 MW	STALE SUPERLATIVE — 500 MW is not the largest even in Poland; no metric given (MW/capex/ha)

Project numbers (MW, m ² , PLN, m ³ /day, jobs, tenant)	Zero numbers in the post; the Climate Ministry (Jun 2026): the investor has not presented water/cooling data ¹⁰⁰	STRUCTURAL OMISSION — 0 project numbers, 1 fund-manager number
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The non-denial logic. The "shell company" accusation is a question about **substance and committed capital**; the post answers with the **existence of entities** and the manager's AUM — client money of an entire firm, against PG's total historical data-centre exposure of "over USD 4bn since 2021" ¹³⁰, while a 500 MW–1 GW campus is a single multi-billion bet. Every sentence of the post can be literally true while the core accusation remains unresolved — a **non-denial** structure. Add the **role conflict**: the office that initiated the MPZP and runs the consultation co-produces persuasive material with the investor in / fact-checking format, published on Facebook only (not in BIP), with no sources, dates, or registry data.

Conclusion. One press release from Zug would kill the "myth" in a single sentence. Until then, the post is development-stage material dressed in the office's authority — and it raises four new questions (Theme 7, Q26–Q29 in «Belchatow_Questions_EN»): on the office–investor co-production arrangement, on correcting the registry record, on public confirmation by PG, and on project numbers in the series' next instalments.

2.4.9 The "Myth #2" post (25 August 2026) — *water; the series debunks an engineering-accurate order of magnitude with an undocumented promise*

The series' second post ("co-produced with the investor") answers the accusation that the DC "will need thousands of cubic metres of water per day" with a promise: "approx. 50 cubic metres of water" per day (= 150–200 homes; less than the Domiechowice–Emilin solectwo of 220+ homes), with water "mainly for workers' sanitary and social needs and maintaining safety systems", and "it will not be used for cooling" ¹³¹. Full verification: «Belchatow_Mit2_PL.pdf» (Polish); synthesis below.

The comparison arithmetic — honest. $50 \text{ m}^3/\text{day} \div 150\text{--}200 \text{ homes} = 250\text{--}333 \text{ L/home/day}$, consistent with the GUS average ($\sim 94 \text{ L/person/day} \times \sim 2.5\text{--}3 \text{ persons/household}$) ¹³⁸; $220+ \text{ homes} \approx 55\text{--}73 \text{ m}^3/\text{day}$. The first correctly-computed number in the entire series.

The order of magnitude — the "myth" being debunked matches published benchmarks. At 500 MW IT load (12 GWh/day of heat), evaporative-cooling water use per operator/DOE reports: the new **AWS fleet 0.12 L/kWh $\rightarrow$ 1 440 m³/day** ¹³³; **Microsoft 0.30 (FY2024) $\rightarrow$ 3 600** ¹³⁴; US average per **LBNL 0.45–0.48 $\rightarrow$ 5 400–5 760** ¹³²; legacy installed base $\sim 1.8\text{--}1.9 \rightarrow 21\ 600\text{--}22\ 800$ ^{85 · 22}; Google's Mesa permit $\approx 15\ 000 \text{ m}^3/\text{day}$ for a single campus [C · INDUSTRY REPORTS]. "Thousands of m³ per day" is thus the lower half of the ordinary range — not a myth. The promise's implied WUE ($50 \text{ m}^3 \div 12 \text{ GWh} = \mathbf{0.004 \text{ L/kWh}}$) is $\sim 29\text{--}115\times$ below reference fleets ($29\times$ vs the best, AWS 0.12 L/kWh; $115\times$ vs the LBNL average 0.48) and consistent only with a fully **waterless** design (real technology — Microsoft announced in December 2024 (first deployments ~ 2027), Meta describing from 2025 campuses whose water is domestic/janitorial/fire-only ^{134 · 135}) — but committed **nowhere**: the word "cooling" appears not once in either the MPZP resolution or the environmental forecast (full-text verification of both BIP PDFs), and forecast § 11.15 explicitly defers water demand to "the future activity type, technology..."

The international template: "zero water" versus the numbers from a lawsuit. The flagship deployment of waterless technology is Microsoft's campus in Mount Pleasant, Wisconsin — the same "zero water for cooling" project invoked in the WUE analysis above. The company's December 2024 declarations: savings of ~ 91 million liters of water per facility per year, and a peak draw of $\sim 350,000$ gallons per

day ($\approx 1,325 \text{ m}^3$) only on the hottest days, May through September ²¹⁵. The actual scale became public only after environmental groups sued for access to records: documents released by the City of Racine show 2.8 million gallons of Lake Michigan water in 2026 ($\approx 10,600 \text{ m}^3$) and up to 8.4 million gallons per year ($\approx 87 \text{ m}^3$ per day on average) ²¹⁶. When the household comparison "four Olympic swimming pools" entered public circulation, Wisconsin Watch fact-checked it as false: projected annual use exceeds four Olympic pools more than threefold ²¹⁷. The lesson for Domiechowice: even with the flagship "waterless" investor, the numbers live in documents, not metaphors — and here they surfaced only after legal action. An average of $\sim 87 \text{ m}^3$ per day for Mount Pleasant's first phase is the order of magnitude of the "50 m^3 " promise, except that there it is backed by a documented design, while here, so far, only by a social-media post.

Three public contradictions. (1) The Ministry of Climate and Environment (Jun 2026): the investor "has not presented information [...] including water-consumption volume and the planned cooling system" ¹⁰⁰ — two months later the gmina publishes exact m^3/day figures and a categorical system description as "✅ Facts". (2) The gmina itself told the press (Jun 2026): cooling "in a closed circuit" with **water circulating in the system** plus a rainwater retention tank "for emergency cooling of installations" ¹⁰⁰ — the post categorically excludes any cooling use; "closed loop" settles nothing, since it covers the evaporative-tower variant (consuming 70–80 % of withdrawal — thousands of m^3/day at 500 MW), the hybrid variant (water only during hot spells) and the sealed dry loop (waterless cooling) ^{86 · 18}; the message does not say which. (3) The preamble repeats the superlative "no equivalent in our part of Europe" already falsified in §2.4.8 (Lublewo/Choczewo 3.2 GW = $6.4 \times$ the announced 500 MW phase) ^{129 · 139}.

What the number omits. (a) **Phase and scaling:** 50 m^3/day with no phase stated; at the declared ~ 1 GW ambition, linearly $\sim 100 \text{ m}^3/\text{day}$ — more than the whole sołectwo; "less than the village" is a 9–31% margin framed as a decisive gap, while physically the DC **adds** +68–91% to village demand on the same infrastructure. (b) **Procedure:** 50 m^3/day is $10 \times$ the water-permit threshold ($> 5 \text{ m}^3/\text{day}$ annual average for business use) ¹³⁶ — no application filed; MPZP § 20 permits interim **wells with no cap** (a single Quaternary well at 10–40 m^3/h per the forecast could legally draw 240–960 m^3/day). (c) **The categories don't close:** "mainly sanitary" at 60 L/person/day would require ≥ 417 staff ($> 50\% \times 50 \text{ m}^3$), against an industry norm of 50–200 FTE; "safety systems" as a tens-of- m^3/day consumer appears in no known water balance; winter humidification of halls is process water even in "waterless" designs. (d) **Fire water:** the $\geq 72 \text{ m}^3/\text{h}$ requirement for buildings $> 5\,000 \text{ m}^3$ ¹³⁷ exceeds $\varnothing 150$ pipe capacity at 1 m/s (63.6 m^3/h) — tanks required; a single 30–60-min hydrant test consumes 36–72 m^3 , i.e. $0.7\text{--}1.4 \times$ the entire promised day. (e) **Sewage:** $\sim 40\text{--}47 \text{ m}^3/\text{day}$; until the sewer exists, § 21 prescribes sealed tanks = 4–5 tanker loads per day through the village; the receiving plant (city WOD-KAN with $\sim 4\,000 \text{ m}^3/\text{day}$ spare vs the gmina network) unknown. (f) **Drought:** the same Quaternary aquifer feeds domestic and farm wells; in 2025 agricultural drought hit 43% of Łódzkie gminas ¹⁴⁰ — in a water conflict, industry queues behind population and agriculture. (g) **The price of waterlessness:** if the promise holds, 500 MW of heat shifts onto $\sim 290+$ dry coolers (64–73 dB(A)-at-10 m class), 9–21 MW of fans in typical operation, higher PUE and summer derating — and the MPZP sets no noise limit and no acoustic study exists.

Conclusion. The post debunks an engineering-accurate order of magnitude with a promise that has no documentary foundation, partially contradicts the gmina's own earlier statements and — per the regulator — was preceded by no data being presented at all. The only durable way to bind the 50 m^3 figure to the project exists within the consultation window: **a water-abstraction cap written into MPZP § 20**

(m³/day annual average and maximum); cooling technology, WUE and noise belong to the future environmental decision (DŚU). Nine new questions: Theme 8 (Q30–Q38) in «Belchatow_Questions_EN», including pre-emptive noise questions in case a "Myth #3" instalment follows.

2.4.10 The "Myth #3" post (25 August 2026) — the first technology description, still without a number or a document

The third post in the "myth-busting" series ("together with the investor") answers the charge that cooling will be "an environmental disaster" requiring "enormous amounts of water": cooling is to be **waterless** — a hybrid system with a **closed coolant loop**, based on "passive" air cooling for most of the year plus "high-efficiency chiller aggregates" in hot spells ¹⁴². Full fact-check: «Belchatow_Mit3_PL.pdf» (Polish); synthesis below.

The first technology description — an indirect answer to Q31. After two instalments without technical content, the post points to the topology of variant (c) in §3.4 — a sealed dry loop with free-cooling/compressor control. The technology is real: analogous systems have been announced by Microsoft (December 2024; pilots 2026, first sites late 2027 — water there circulates in a sealed loop between servers and chillers; "zero" refers to consumption, not the absence of the medium) ¹³⁴ and Meta (2025) ¹³⁵; in central Poland free cooling covers most hours of the year [COMPUTED - climate normals].

Four descriptions in four months, zero documents. June: "water circulating in the system" + a rain-water tank "for emergency cooling of installations" ¹⁰⁰; "Myth #2" (August): "it will not be used for cooling" ¹³¹; "Myth #3": a hybrid dry loop; September (investor meeting in Emilin): "immersive cooling" — §2.4.17. The descriptions can be reconciled by reading "water = working medium in a sealed loop" (that is how Microsoft's waterless design works) — but then the rainwater tank "for emergency cooling" is left unexplained, and "does not consume water" becomes linguistically imprecise (the medium is often water-glycol). The word "cooling" still appears not once in either the MPZP resolution or the forecast (full-text verification) — the technology choice remains in the realm of communications, not commitments.

The price of waterlessness — three numbers the post does not give. (a) **Noise and fleet:** waterless rejection of 500 MW requires ~290–550+ dry coolers depending on unit class (largest catalogue units; noise class 64–73 dB(A) at 10 m per catalogs; real project: 44 coolers per 75 MW) and fans drawing 9–21 MW in typical operation ^{143·144}; the MPZP sets no dB limit (Q37/Q44). (b) **Peak power:** in heatwaves compressor draw is ~120–190 MW (heat 550–570 MW — 500 MW IT × PUE 1.1–1.14; momentary peak PUE ~1.25–1.4 vs annual average 1.1–1.14, full justification in «Belchatow_Mit3_PL» — ÷ COP 3–4.5); the sum — 500 MW IT + 9–21 MW of fans + 120–190 MW of chillers ≈ **630–710 MW campus peak (+26–42%)** — lands precisely at grid peak hours; after aggregation to ~1 GW — ~1.26–1.4 GW [COMPUTED] (Q43). (c) **The water balance still does not exist:** humidification, sanitary and fire uses remain, and there is still no water permit (Q46, Q32).

Conclusion. The post narrows the "environmental disaster" to the water axis alone — omitting noise, peak energy and heat recovery (Art. 26(6) EED); it is the third description of the installation in a row without legal force and without a design number. Five new questions: Theme 10 (Q42–Q46) in «Belchatow_Questions_EN».

2.4.11 The "Myth #4" post (August 2026) — electricity: connection conditions, PSE and power prices; a fact-check

The series' fourth post ("co-produced with the investor") answers the charge that residents may simply "run out of electricity" or that "energy prices will rise": the target connection capacity is 500 MW, with "approval" from PSE, which "confirmed that connecting the facility will not threaten the security of the whole system or the supply of other consumers", while the HDC's operation "will not affect electricity prices for households" ¹⁴⁵. The preamble repeats, for the fourth time, the superlative "no equivalent in our part of Europe", already falsified in §2.4.8 (Lublewo/Choczewo 3.2 GW) ¹²⁹. Full analysis of the post: «Belchatow_Mit4_PL» (Polish); synthesis below.

Post claim	Source / legal and market record	Verdict
"Target connection capacity 500 MW"; "approval from PSE"	The statutory mechanism is not "approval" but the determination of grid connection conditions with a mandatory system-impact expert study (Art. 7(3a) and 7(8e) of the Energy Law; 500 MW far exceeds the 5 MW exemption threshold) ¹⁴⁶ ; the MPZP resolution and the environmental forecast contain zero mentions of PSE or of any connection capacity (full-text verification of both BIP PDFs)	PARTIALLY TRUE / NOT PUBLICLY VERIFIABLE
"PSE analysed in detail and confirmed no threat to the system or consumers"	The system-impact study is a statutory precondition of issuing connection conditions — if conditions exist, the study happened ¹⁴⁶ ; but its scope is system security at the connection point — not prices, not reserves in the 2030+ horizon, not the allocation of reinforcement costs; the document is unpublished (routinely business-confidential)	PARTIALLY TRUE
"500 MW is not a threat to the system"; "the power plant had ten times more capacity"	Elektrownia Belchatów installed capacity 5 096.7 MW ¹⁴⁷ $\approx 10 \times$ 500 MW — numerically consistent, but this compares a power draw with generating capacity, and with capacity that leaves the system in 2030–2036 (TJTP) ^{51 · 52} ; scale: 500 MW = 1.8% of the record KSE peak demand (27.6 GW, 9 Jan 2026) ¹⁴⁸ , ~2.6% of annual consumption and 4.5% of the average 2025 peak reserve [COMPUTED]	NUMBERS CORRECT, MISLEADING COMPARISON
"The HDC's operation will not affect household electricity prices"	Composition fallacy: what is true of a single home is not true of 500 MW of baseload; channels: wholesale (merit-order), the capacity market (~PLN 10 bn in 2026 — an industry estimate) ¹⁵⁰ , network reinforcements socialized through distribution tariffs ¹⁴⁹ ; the direction is confirmed by PJM ¹⁵¹ and Ireland ¹⁵³ — details below	AN OVERCLAIM — direction of effect upward, magnitude hard to quantify and most likely small
(The implied myth) "residents may run out of electricity"	Grid load-shedding stages 11–20 apply only to consumers with contracted capacity ≥ 300 kW — households are excluded from the curtailment system by regulation, while the HDC would be in the first tier of reductions ¹⁵⁴	HONEST CONCESSION — the mechanism genuinely protects households

The honest half. On the system layer the gmina is largely right. 500 MW is 1.8% of the record KSE demand — 27.6 GW net on 9 January 2026, met "with an adequate power reserve" — against installed capacity of 77 331 MW ¹⁴⁸; the deficit mechanism by definition bypasses households (<300 kW) ¹⁵⁴; and a system-impact study is mandatory by statute for a connection of this scale ¹⁴⁶. "Residents will run out of power" is not a realistic operational scenario — the real questions concern reserves, the timing of network reinforcements, and flexibility commitments. One caveat: exclusion from the rationing stages is not full immunity — in deficit states PSE may lower the supply voltage in the network, which affects all consumers in a given area; a rare mechanism, but distinct from the rationing stages.

From "approval" to connection conditions. What the post calls "approval from PSE" is in the statute the "determination of connection conditions" (Art. 7(3a)) — a technical document issued after a system-impact study mandatory for connections above 1 kV (Art. 7(8e); exemptions only up to 5 MW)¹⁴⁶. If conditions were issued, the study happened; but its scope is security at the connection point — not electricity prices, not system reserves in the 2030–2036 unit-retirement horizon, and not the allocation of reinforcement costs, of which the operator covers $\frac{3}{4}$, refinanced through all consumers' tariffs (Art. 7(8))¹⁴⁶. The study is not published by default (routinely protected as a business secret) — hence the request for its release (Q48). Most telling is what the planning documents **do not contain**: full-text verification of the MPZP resolution and the environmental forecast yields zero hits for "PSE", "connection capacity", "500 MW", "1 GW", "GPZ", "400 kV" and any MW figure; the only "power" provision (§ 22(5)) permits power substations and high- and highest-voltage infrastructure. The project's entire electricity narrative exists only in the gmina's and investor's communication, not in the documents on which the consultation rests.

A comparison with capacity that disappears. Elektrownia Bełchatów: installed capacity 5 096.7 MW, attainable 5 102 MW¹⁴⁷ — arithmetically $\sim 10 \times 500$ MW. But comparing a draw with generation omits two facts: the plant's units leave the system in 2030–2036^{51·52} — and the HDC's start-up schedule has not been published: if full capacity arrives after 2030, it will coincide with the retirement window (a facility opened in 2029–2030 would spend its first 6–7 years on a source being retired beneath it, §4.2; the timing overlap is a projection, not an established fact) — and after aggregation to ~ 1 GW the campus peak draw (630–710 MW, §2.4.10) will reach 2.3–2.6% of the country's record demand [COMPUTED]. That is a large single consumer which does not threaten the system, but which joins it at full power exactly at peak hours.

Prices: direction known, magnitude small, certainty zero. "The price does not depend on the consumption of a single consumer" is true of a household and false of 500 MW of baseload — a composition fallacy. The channels are real and visible in the bill: wholesale (merit-order), the capacity market — $\sim$ PLN 10 bn in 2026 (an industry estimate), the capacity fee PLN 17.18/month in the typical 1200–2800 kWh band¹⁵⁰ — and distribution tariffs ($\sim$ half the bill), through which reinforcement costs are socialized¹⁴⁹; since 1 January 2026 households are back on market tariffs ($\sim$ PLN 495/MWh)¹⁴⁹, so system-cost changes pass into bills faster than during the price freeze. The direction is confirmed by jurisdictions that allowed scale: the official PJM market monitor finds data centres "the primary reason" for high capacity prices (auction revenues +USD 7.3 bn, +82%, to USD 16.1 bn)¹⁵¹; capacity prices rose from USD 28.92 to 329.17/MW-day ($\sim 11\times$)¹⁵²; in Ireland data centres draw 22% of metered consumption (EirGrid median: 31% by 2034)¹⁵³ — the scale that produced the Dublin moratorium⁷². **Honestly:** the impact of a single 500 MW HDC on a Polish household's bill is hard to quantify and most likely small — the entire capacity-market cost currently visible in a bill (PLN 17.18/month) is the upper measure of a channel the project could enlarge by a fraction¹⁵⁰. The categorical "will not affect it at all", however, zeroes out an uncertainty that — until the impact study and connection conditions are public — no one can zero out: the open data give the direction, not the magnitude.

Scaling and flexibility — what the post does not say. Metropolises that have been through this scale cap connections instead of promising no impact: Amsterdam maintains a **670 MVA** cap on new data-centre capacity until 2030¹⁵⁵ (cf. ⁷⁷, ⁷⁸), and Ireland requires new facilities to bring their own dispatchable generation ("Bring Your Own Generation") and $\geq 80\%$ of energy from new Irish renewables¹⁵³.

A real flexibility mechanism also exists, worth raising with PSE and the investor (Q49): Microsoft's Dublin data centre has since 2022 fed UPS battery power back into the grid at the operator's signal (EirGrid system-services market) ¹⁵⁶.

Conclusion. The post is right that the system will absorb 500 MW without a blackout risk and that households are not the addressees of deficit curtailments — but the "PSE approval" is a connection-conditions document resting on an unpublished study, the power-plant comparison omits the plant's 2030–2036 retirement, and "will not affect prices" is stronger than any available evidence. Full analysis of the post: «Belchatow_Mit4_PL» (Polish); new questions Q47–Q51 in «Belchatow_Questions_EN» (on publishing the impact study and full connection conditions, phasing 500 MW against ~1 GW, and flexibility commitments).

2.4.12 The "Myth #5" post (August 2026) — noise: screens, enclosures and the "wall of forest"; a fact-check

The fifth post in the "myth-busting" series ("together with the investor") answers the charge closest to the daily life of the zone's neighbours: a data centre "means enormous noise that will make life impossible for residents of the surrounding villages". Cooling systems and generators are to receive "state-of-the-art acoustic enclosures and silencers", "extensive acoustic screens" will be built as additional protection, and the whole campus is to be surrounded by a "wall" of forest and greenery as a "natural barrier" — because "acoustic analyses show that the noise level will not exceed the norms binding for residential areas" ¹⁶³. The preamble repeats, for the fifth time, the superlative "no equivalent in our part of Europe", falsified in §2.4.8 (Lublewo/Choczewo 3.2 GW) ¹²⁹. This is the series' first reply that names concrete measures rather than superlatives alone — and the first whose conclusion ("will not exceed the norms") cannot be derived from the measures it lists. Full fact-check: «Belchatow_Mit5_PL.pdf» (Polish; post card archived 26 August 2026 — the graphic itself carries no publication date, assumed: August 2026); synthesis below.

The physics of barriers: sources on roofs, screens at grade. An acoustic screen works by diffraction over its top edge and attenuates only when it breaks the source–receiver line of sight; effective screens give 5–10 dB, walls above ~8 m are structurally atypical, and vegetation — in the US Federal Highway Administration's own words — is planted "for psychological relief but not to physically lessen noise levels" ^{157·158}. Yet the plan permits halls up to 30 m tall [A · §28(3)(g)], and coolers and fans sit precisely on roofs and walls: for sources at 20–30 m and receivers in Domiechowice and Emilin (at an estimated 300–800 m from the zone's edge — the planning documents give no distances to the nearest buildings) the sight line passes some 11–25 m above a 3–8 m screen — an insertion loss of ~0 dB across the band, while an effective screen would have to stand 19–29 m tall and run at least 2.4 km [COMPUTED - ISO 9613-2 geometry; FHWA rules]. The "wall of forest" carries four problems at once: 30 m of dense forest attenuate ~5 dB and mainly high frequencies — while large-fan noise is mostly 35–200 Hz [COMPUTED - blade-pass bands]; an oak takes 60–100+ years to reach 20 m, so a sapling planting attenuates practically nothing in the campus's first decade; from existing forest land (Ls) the halls must stand 12–40 m away depending on fire-load density and construction (12/22.5/30 m for a hall of non-fire-spreading elements; 16/30/40 m where its own roof covering or forest-facing wall spreads fire — § 271(8) of the technical conditions) — that wall can be moved no closer to the halls, while a belt planted on campus land is not "forest" within the meaning of the provision, so nothing sets its parameters and for decades it is saplings, not a barrier; and the campus adjoins State Forest land — the post does not say on whose land and at whose cost the "wall" arises ^{157·158}.

The fleet arithmetic the post does not do. Rejecting 500 MW of heat waterlessly requires a fleet of ~290–550+ dry coolers of the 64–73 dB(A) at 10 m class (§2.4.10)¹⁴³ — and 300 units sound like one unit plus 24.8 dB ($10 \cdot \log_{10} 300$) [COMPUTED]; in a free-field simplification the contour of the 40 dB night limit reaches 2.7–10.5 km from the campus (3.8–14.8 km after the ~1 GW expansion) [COMPUTED - an order of magnitude, not a forecast]. The limit for Domiechowice and Emilin (single-family housing) is **50 dB LAeqD / 40 dB LAeqN** (item 2 letter a of the annex)³¹ — where the night indicator is computed for the **worst single hour of the night**, not an average, coinciding with WHO's voluntary health target¹⁰, and fan tonality (audible blade-pass tones) adds 3–6 dB to the rating per ISO 1996-1. The campus runs 24/7, and fan output peaks exactly on hot summer nights — when windows in Domiechowice stand open. Real ground and atmospheric attenuation will shrink that radius — though with wind from the campus or a temperature inversion attenuation drops, so downwind the contour may lengthen — but the conclusion "will not exceed" requires a propagation model with an inventory of sources — and no such model exists.

Gensets: the fleet invisible in the post. Backup capacity for 500 MW of IT ($500 \text{ MW} \times \text{PUE } 1.1\text{--}1.3 \times N+1$ reserve 1.2–1.4 ÷ unit capacity; read as connection power instead — some 185–280 units) is — by industry methodology and documented campuses — on the order of **200–360 gensets** of the 2.5–3.25 MW class [COMPUTED - anchors: Amazon Manassas $93 \times 2.5 \text{ MW}$; a Northern Virginia campus 245 units/~1,083 MW, i.e. an average of ~4.4 MW per unit - larger unit classes], and the catalogue sound-attenuated enclosure tops out at 75–85 dBA at 7 m for that power class¹⁶⁰. Gensets do not run only during outages: the US NFPA 110 standard (industry practice for hyperscale facilities, not a Polish requirement) requires a loaded exercise at least monthly for 30 minutes¹⁵⁹ — with a fleet of ~300 units that is ~3,600 test starts a year, spread evenly close to ten tests a day somewhere on campus [COMPUTED - calendar arithmetic]. Precedents show the scale of the conflict the series calls a "myth": xAI Southaven/Memphis — a continuous rumble audible ~800 m from the installation and a class action filed 8 June 2026¹⁶¹; Northern Virginia — per the JLARC parliamentary commission report almost 1/3 of data centres stand closer than 61 m to residential zones, though the report itself cautions the noise "rarely" violates ordinances¹⁶²; residents there reported noise exceeding 60 dB at their homes, and Amazon retrofitted its facilities with acoustic shrouds only after waves of complaints, just as a decade of rumble in Chandler (Arizona) ended in a zoning change [D · EESI]. Regulatory compliance and community acceptance are two different things in this industry — complaint waves erupted there despite formal compliance.

Conclusion. The promise "will not exceed the norms" cannot be derived from the measures the post lists: genset enclosures work but top out at 75–85 dBA at 7 m in catalogues; screens do not reach sources on roofs of halls up to 30 m; forest attenuates a few decibels in a band that passes through anyway. The "acoustic analyses" the post invokes have not been published or identified — the environmental forecast contains not a single dB value or measurement [A · §11.10, §11.11.B], and the MPZP's only noise rule (§ 11(4)) defers to "environmental quality standards" without a number [A · §11(4)] — a result without an underlying document, following the pattern of "Myth #2". The one durable handle exists in the consultation window: **writing the 50 dB LAeqD / 40 dB LAeqN limit at the plot boundary into § 11 of the MPZP** together with a mandatory accredited baseline measurement before construction — closing the demand of Q9 (Q57). Six new questions: Theme 12 (Q52–Q57) in «Belchatow_Questions_EN».

2.4.13 The "Myth #6" post (August 2026) — forests: agricultural land, self-seeded growth and the inventory; a fact-check

The sixth post in the "myth-busting" series ("together with the investor") answers the charge that "hectares of forest must be cut for the campus to be built": the project area is supposedly land of agricultural character "both in the past and at present", "not forest land"; parts of the plots carry "natural self-seeded trees and shrubs" (samosiewy) which "will be covered by a detailed dendrological inventory", and all further actions are to proceed "in accordance with the law and the decisions of the competent authorities" ¹⁶⁸. The preamble repeats, for the sixth time, the superlative "no equivalent in our part of Europe" (the preamble comes from the post's text above the graphic — the archived card carries only the series title, "Myth" and "Facts"), falsified in §2.4.8 (Lublewo/Choczewo 3.2 GW) ¹²⁹. This is the series' strongest episode — and the first whose core, as regards the present state of the land, is confirmed by the gmina's own planning package. Full fact-check: «Belchatow_Mit6_PL.pdf» (Polish; post card archived 27 August 2026 — the graphic carries no publication date, assumed: August 2026); synthesis below.

Agricultural, not forest — confirmed as to the present. The MPZP resolution describes the zone as uncultivated agricultural land (p. 10); the environmental forecast characterizes the vegetation as segetal and ruderal on farmed or fallow land, records soil classes IV–VI with no classes I–III and identifies no forest habitat (pp. 7, 11, 17–19, 37); the absence of legally protected forest in the plan area is confirmed by the resolution itself (p. 11) [A · BIP]. The forecast's orthophoto (p. 6) shows no closed tree stand inside the zone. Self-seeded growth has its own, agricultural register class — Lzr, "land tree- and shrub-covered within agricultural land" — and does not meet the statutory definition of forest (compact area ≥ 0.10 ha, forest vegetation with forest undergrowth, or designation for forest production; the "de facto forest" case-law line, incl. SN I CSK 258/09, finds no application on the facts documented by the orthophoto) ^{164 · 167}. Caveat: the "in the past" claim has no support in any document of the package — the post's only thesis without a document, following the "number without a source" pattern of §2.4.9.

Self-seeded growth and the "detailed inventory" — a soft commitment. The words "samosiew" (self-seeded), "tree stand" or "dendrological inventory" appear in no planning document; the forecast's species list is entirely herbaceous [A · BIP]. A "dendrological inventory" is not a statutory institution: legally unavoidable is only the enumeration of specimens covered by tree- and shrub-removal permit applications (species, trunk girth at 130 cm, area, location) ¹⁶⁵ — on the investor's timetable, at building-permit stage. Below the exemption thresholds (shrub clusters up to 25 m²; trees with trunk girth at 5 cm up to 80/65/50 cm depending on species) removal requires no permit, no document and no fee — and self-seeded growth ("self-seeded" describes origin, not age; the orthophoto shows no mature tree stand, so no one knows the girth distribution) falls below those thresholds in an unknown proportion: that part of the population will vanish without any legal trace ¹⁶⁵. The inventory's "detail", contractor, deadline and publication are enforced by nothing.

"Decisions of the competent authorities" — an empty formula, and the 12 m zone. For mineral soils of classes IV–VI, exclusion from agricultural production requires no decision and no fee (closed list of art. 11 ust. 1 of the act on the protection of agricultural and forest land — the same consolidated position the resolution's justification itself invokes) ¹⁶⁶; the project's real decisions (environmental decision, permits) — the DŚU proceeding is already formally open (application of 22.12.2025) and suspended pending the OOS report ¹⁷², while the decision itself and the permits still lie ahead of the investor. The one "forest" decision the plan has already taken is the building-restriction zone 12 m from the forest boundary (§ 13 and the MPZP drawing) [A · BIP] — the lowest rung of WT § 271(8), attainable only at a fire-load density of $Q \leq 1000$ MJ/m² (above: 22.5 m and 30 m for halls of non-fire-spreading elements; §6.8) [A · WT §271(8)].

A neighbour, not a victim. The campus borders State Forest (north, west, south; DK74 to the east) — the project "touches" the forest by statutory-distance adjacency, not by felling [A · BIP]. The forecast foresees partial removal of the site's existing vegetation cover (§ 11.11.D) — the segetal-ruderal growth with self-seeded trees. The "wall of forest" promised in "Myth #5" would thus arise from plantings on agricultural/industrial land that is not "forest" in register or WT terms (§2.4.12). One question remains open: the route of the connection to GPZ Kurnos has not been published — and power lines are in practice also routed through forests [UNVERIFIED - route unpublished]; this is the most probable seed of the "hectares of forest" rumour.

Conclusion. The charge of "felling hectares of forest" is inaccurate as to the project site — and this analysis records that without reservation. But the post proves less than its form promises: a "past" without a document, self-seeded growth without a number or map, an inventory without deadline or addressee, "decisions of authorities" that for mineral classes IV–VI will simply not exist (the forecast does not settle soil origin — for any organic parcels the starosta track returns; see Q59). Six questions issue in the consultation window: Theme 13 (Q58–Q63) in «Belchatow_Questions_EN» — strongest: Q58 (publish the inventory before the plan is adopted), Q59 (land-register extracts), Q62 (the connection-corridor map).

2.4.14 The "Myth #7" post (August 2026) — land, utilities and roads: who really pays; a fact-check

The seventh post in the "myth-busting" series ("together with the investor") answers the charge that "the gmina will buy the land from private owners, service the plots and build the roads with taxpayers' money" while the campus "moves in ready-made": the land belongs to private persons, "a large part of these areas has already been purchased by the investor", "the gmina bears no costs in this connection", and "the investor will pay for all activities related to preparing the site — from designs, through servicing the plots, road construction etc." ¹⁷⁷. The preamble repeats, for the seventh time, the superlative "no equivalent in our part of Europe" (the preamble comes from the post's text above the graphic — the archived card carries only the series title, "Myth" and "Facts"), falsified in §2.4.8 (Lublewo/Choczewo 3.2 GW) ¹²⁹. For the first time the post answers a charge absent from our question card (none of the 63 questions claims the gmina is buying the campus land) — and does not answer the questions the card does contain: about procedure costs, public roads and networks. Full fact-check: «Belchatow_Mit7_PL.pdf» (Polish; post card archived 28 August 2026 — the graphic carries no publication date, assumed: August 2026); synthesis below.

The true core — the gmina is not buying the campus land. The planning package describes the zone as unbuilt agricultural land with no municipal-resource designation, and the party to the land transactions is — per the press and a written purchase offer — BLUENEXT ENERGY, not the gmina ¹²¹. The charge "the gmina will buy the land" is inaccurate as to the campus, and this analysis records that. The rest of the answer proves less than its form promises.

The procedure's costs fall on the gmina budget — by statute. Plan-preparation costs fall on the gmina budget (art. 21(1) of the Planning Act); the exceptions charging the investor or other public budgets apply only to plans that are a direct consequence of a public-purpose investment — and the statutory catalogue (Planning Act art. 2(5) read with art. 6 of the Real-Estate Management Act) does not inc-

lude a private data campus, regardless of the entity's status ^{173·174}. The plan was initiated by Council Resolution no. XXI/169/2025 of 25 September 2025 ¹⁷⁶; since then the gmina has been paying for the OOS forecast (author: Łukasz Beń), notices and consultations — no amounts published. Private-investor cost-sharing is possible only by contract, not by statute [C · PRACTICE COMMENTARY].

"A large part purchased" — unfalsifiable, and ahead of the public record. The last public description of the transactions (press, 2.04.2026) spoke of preliminary agreements with "ownership to be transferred after the planning procedures conclude" ¹⁰²; a preliminary agreement does not transfer ownership (art. 389 Civil Code; a notarial deed does — art. 158 CC — with the land-register entry decisive towards third parties — art. 5 of the Land Register Act) ¹⁷⁸. Specific registers can be viewed publicly, but their numbers cannot be identified without a plot list; the gmina's inter-session information lists the 71 cadastral plots of the DŚU application without ownership status ¹⁷². The buyer is a micro-shell with 6,300 PLN capital — not the project company (§2.4.3). On top of that, §27 of the plan sets the planning fee on the value increase **at 30% — the statutory maximum** (Planning Act art. 36(4) read with art. 37(3)–(4)), and the resolution's justification records it expressly as gmina income — since ownership is to pass after the plan's adoption, the fee's burden will fall on the selling residents [A · BIP §27; §6.1].

Public roads and networks: the gmina's own plan vs the post's promise. The plan designates public roads — 1KDR, 26.8–44 m wide (along dk74; it looks like a national-road widening reserve — an interpretative inference) and three KDZ (§ 16, § 29–30) [A · BIP]; maintaining public roads is the road manager's task — for municipal roads, the wójt — charged to the local budget ¹⁷⁵; investor construction is a one-off cost, maintenance is perpetual (the council assigns the road's category; it can also be raised, shifting the burden to the powiat). Two statutory scenarios in which the gmina may genuinely become a buyer of plan-area land: the pre-emption right on sales of areas designated for public purposes (Real-Estate Management Act art. 109(1)(3), if disclosed in the land register; excluded for national-road purposes — art. 109(3)(6)) and the owner's demand for buy-out where the plan materially restricted their use (Planning Act art. 36(1)(2)) ^{174·173}. The networks, in turn, have their financing settled in the plan — contrary to the post's spirit: Annex 2 provides that water/sewage network construction will be financed "from the water utility's own funds [...] **or based on the gmina budget**", electricity and gas networks per the Energy Law (operators); the resolution's justification lists these expenditures expressly among the plan's financial consequences (alongside planning-fee and property-tax incomes) — the investor appears nowhere in the financial provisions [A · BIP, ANNEX 2 § 4].

Conclusion. Private land and a market purchase — confirmed; "the gmina bears no costs" — true of the land purchase, half-true of the process (the planning procedure and — per Annex 2 — potentially the networks are paid by the gmina's taxpayers); "the investor will pay for all activities" — a promise without a contract, contradicted by the gmina's own planning documents. Six questions issue in the consultation window and beyond: Theme 14 (Q64–Q69) in «Belchatow_Questions_EN» — strongest: Q64 (plot list with form of acquisition), Q65 (procedure costs and cost-sharing), Q68 (the post vs Annex 2 contradiction).

2.4.15 The "Myth #8" post (August 2026) — employment: how many jobs, whose hands, whose PIT; a fact-check

The eighth post in the "myth-busting" series ("together with the investor") answers the charge that "such projects don't need many hands to work" and "only a handful of highly qualified specialists will find employment here" — with numbers: in construction "200 to 800 people - depending on the stage", once operational "approx. 250 permanent jobs" (IT engineers, cybersecurity experts, technicians, infrastructure-

maintenance specialists, security), and a qualitative multiplier — "other businesses will also develop around such a large facility" (service, logistics, construction, transport, gastronomy) ¹⁷⁹. The preamble repeats, for the eighth time, the superlative "no equivalent in our part of Europe" (the preamble comes from the post's text above the graphic — the archived card carries only the series title, "Myth" and "Facts"), falsified in §2.4.8 (Lublewo/Choczewo 3.2 GW) ¹²⁹. For the first time the post publishes employment numbers the question card had demanded since "Myth #1" (Q29) — and for the first time a figure from the office withstands comparison with independent data. Full fact-check: «Belchatow_Mit8_PL.pdf» (Polish; post card archived 29 August 2026 — the graphic carries no publication date, assumed: August 2026); synthesis below (the project's full employment context: §7.1).

The order of magnitude of 250 matches the benchmarks — but a figure without definition and without anchoring. Documented operational staffing: a typical data-center building has ~50 staff, "about half" of them contractors (JLARC) ¹⁶²; the most automated campuses run on 20–40 jobs per 100 MW ¹⁸²; Meta publishes 500–1,000 jobs at a >2 GW campus (Richland Parish) ¹⁸³, and Google directly employs 250 people in Council Bluffs — with ~900 "on site" including suppliers ¹⁸⁴. 250 at 500 MW–1 GW is 0.25–0.5 jobs/MW — within the band (at 500 MW the top, optimistic edge; at 1 GW the lower half of the range). The figure nonetheless remains without definition (operator headcount or with contractors; at which capacity; at which point of the expansion) and without anchoring: the MPZP resolution contains not a single employment provision (full-text check), the OOS forecast mentions "the creation of new jobs" only qualitatively (§11.10, §11.11.B), and §11.15 expressly treats "the number of workers" as an unknown variable when estimating water demand [A · BIP] — the series' fourth soft numeric commitment.

The gmina's own numbers fell, without explanation. In April the wójt promised a construction site for "several thousand people" ¹⁰²; in May — "ultimately around 400 people" and construction demand "in the thousands", with 18 buildings and construction from mid-2028 ¹⁸⁰; the August post says 200–800 and 250 ¹⁷⁹ — the communicated jobs package shrank within a few months (April–August 2026) by ~40% (permanent jobs), with construction figures down several-fold at least [COMPUTED]. Paradoxically, 200–800 is also **below** the documented construction peaks (~1,500 workers at the height of a single building's construction ¹⁶²; 4,000–7,500 at a campus peak ¹⁸³) — a campus takes 8–10 years to build, so construction is a succession of crew waves, not an episode; the gmina's numbers are realistic for a single stage, not for the whole undertaking.

Whose hands and whose PIT — questions the post does not answer. Construction crews are largely itinerant specialists from a specialized market — travelling electrician brigades in the US, "out-of-town workers who leave when the construction is over" ^{185 · 70}; in Poland data centers are built by specialized contractors (Porr, Mercury Engineering), and no operator publishes per-site headcounts — sector-wide ~27 thousand "direct" company jobs across ~150 facilities $\approx$ ~181 per facility ⁸⁷. In operations, "the biggest players do not hire top specialists on site, but fly them in when something breaks" ¹⁸⁷. The residents' share of the 250 jobs remains unknown — and nothing binds it. The fiscal mechanics, in turn, work differently than the "jobs" rhetoric suggests: the PIT share attaches to the taxpayer's **place of residence** — under the Act of 1 October 2024 on local-government revenues the gmina receives 7.0% of PIT income of its residents and 1.6% of CIT income of companies seated on its territory ¹⁸⁶ — a commuting worker leaves their PIT with their home gmina; the gmina's real revenue stream is the property tax

(§2.4.14). The "other businesses will develop" multiplier contains not a single number; independent research indicates +100–200 jobs per county and unchanged wages [TIER A/edu](#), and the industry — as the official audit put it — "is not job-intensive [...] it is heavily capital intensive" (USD 223,125 of tax incentive per job; $\frac{2}{3}$ of the employment effect from construction and equipment replacement) ¹⁸¹.

Conclusion. Numerically, "approx. 250" is the most honest figure of the entire series — an order of magnitude confirmed by independent benchmarks, and the first number from the office that criticism must concede. But it remains a promise without a document, definition or sanction; it fell against the gmina's own earlier declarations without a single sentence of explanation; it does not answer the questions about the local share and about whose PIT feeds the budget; and "250" remains in tension with the "50 m³" of §2.4.9 (at 60 l/person/day, sanitary use is ~ 15 m³/day — 30% of the promised water; "mainly sanitary" would require ≥ 417 workers [\[COMPUTED\]](#)). With the consultations closed, six questions issue: Theme 15 (Q70–Q75) in «Belchatow_Questions_EN» — strongest: Q70 (source and definition of the figures), Q72 (local share and a commitment), Q75 (a binding jobs minimum with reporting).

2.4.16 Post "Myth #9" (August 2026) — the gmina budget: taxes, schools, sport and "at the investor's cost"; verification

The ninth post in the series (co-produced "with the investor") answers the claim that "only the investor will profit from the project, and for an ordinary resident of the gmina it means nothing but losses" — with assertions of "large and regular revenues to the gmina budget from property taxes", thanks to which "new roads, sewage networks, schools or sports facilities" could be built, and that "at the investor's cost the power grid and roads will be modernized", to the benefit "of all residents" ¹⁹¹. The preamble repeats the "no counterpart in this part of Europe" superlative for the ninth time (it comes from the post text above the graphic), falsified in §2.4.8 (Lublewo/Choczewo 3.2 GW) ¹²⁹. This is the fiscally most important episode of the series — and the first in which the "myth" under attack concerns the gmina's own coffers. Full verification: «Belchatow_Mit9_PL.pdf» (card archived 30 August 2026; the graphic carries no publication date — convention: August 2026); a synthesis follows.

A true core — and the number that is still missing. Property tax will be the largest, guaranteed and recurring gmina revenue from this investment: the taxable objects are land, buildings and structures (art. 2–3 of the Act on Local Taxes and Fees, consolidated text Dz.U. 2025 poz. 707) ³⁴, with the full tax obligation arising on 1 January of the year following the completion of each building (art. 6(2)) — the campus is to be built from mid-2028, so revenues arrive in phases ^{34 · 180}. Since the gmina has published no number (the only one so far — the wójt's "two and a half to three power plants" — remains without a calculation ¹⁰²), the residents computed one: at the Gmina Council's 2026 rates (31.14 PLN/m² of buildings, 1.20 PLN/m² of land, 2% of structures) ¹⁹², 300–500 thousand m² of buildings (600–1,000 m²/MW; anchored on Atman WAW-3 — 43 MW at ~ 19 thousand m², PLN 2.5 bn) ²⁰⁰ and 50–70 ha of land, the revenue is approx. **PLN 11.3–21.4 million per year at 500 MW** — 7–13% of the gmina's current revenues (PLN 164.1 million; 12,718 residents) — and at ~ 1 GW: **PLN 21–39 million, i.e. 13–24%** [\[COMPUTED\]](#) ¹⁹³. The structural ceiling is, however, visible in the law itself: **servers — the most valuable asset of a data center — are not subject to property tax**; what is taxed is the investment's "shell" ¹⁹⁹. PIT/CIT shares (7.0%/1.6%, from budget year 2025 — art. 8 and 116 of the Act on local-government revenues) ¹⁸⁶, at ~ 250 jobs and years of depreciating a multi-billion CAPEX, will jointly yield **at most** on the order of PLN 0.2–2 million per year — an order of magnitude less, and the CIT component can sit at zero for years under a Polish Investment Zone exemption (§7.4) [\[COMPUTED\]](#).

"Schools and sport" — a promise with no trace in the plan. Full-text audit of the planning package (with OCR of scanned files): the words "school" and "sport" do not occur in it once in substance, "utilities/equipping" — zero, and the word "cost" itself — zero in the entire 13-page resolution; the investor appears in the plan's financial provisions not once [A · BIP]. The resolution's justification lists the plan's financial effects without amounts: a **gmina expense** on water/sewage networks "to the extent they are the gmina's own tasks", the planning fee (§27) and "revenues from property tax"; annex 2 §4 assigns water/sewage networks to the water utility **or the gmina budget**, and power/gas networks to the regime of the Energy Law [A · BIP]. Property tax is a non-earmarked revenue (art. 4 of the Act on local-government revenues) — no provision ties it to roads, sewage, schools or sport; those are funded by the council's annual budget resolution, just as it funds today water intakes, sewage, roads and school extensions with no data center at all ¹⁹³.

"At the investor's cost" — a statutory standard sold as a gift. Grid connection is a duty under the Energy Law — and for installations above 1 kV the investor's fee is merely one quarter of the actual outlays (art. 7(8)(1)) ²⁰¹; the network "around" the campus is upgraded primarily for the campus. Modernizing public roads at the investor's cost would require a contract — but an ordinary local plan (which is what governs Domiechowice) contains no statutory mechanism to force investor contributions; the "urbanist contract" exists only for integrated investment plans and revitalization (art. 37ed–37i of the Planning Act) ²⁰¹. This is the second infrastructure promise of the series without a published document (after "Myth #7", §2.4.14, Q68). The international default runs the other way: PJM's federally appointed market monitor attributed a \$7.3 billion (+82%) capacity-auction revenue increase to data-center load, with transmission costs ultimately paid by ratepayers ¹⁹⁷; the Virginia legislative audit counts +\$14–37 per month for a typical household by 2040 ¹⁶².

Who actually benefits — a distribution, not a slogan. The world's strongest real case, Loudoun County (Virginia), draws 38% of its general fund from data centers on 4% of commercial parcels, \$26 of taxes per \$1 of services, and home-owner rates cut every year for a decade — because Virginia taxes the **computer equipment** (\$4.15/\$100), which Polish law does not provide for; and even there the county itself warns of a "plateau" within 5–10 years, and its board voted 7–2 to restrict further growth ¹⁹⁴. Across Virginia's five mature data-center localities, the industry's share of local revenues spans <1–31% — Loudoun is the extreme, not the norm ¹⁶². In Germany (Frankfurt/Rhein-Main, 76 facilities) host municipalities keep ~10% of the industry's fiscal effect — "a poor source of tax revenue for municipalities", as FAZ headlined ¹⁹⁵; Irish councils collect an estimated €62.5 million a year from 89 facilities, while households overpaid ~€715 million for electricity (2015–2023) ¹⁹⁶. In Poland, additionally: property-tax rates apply to all taxpayers in the gmina jointly — they cannot be raised "only for the data center" ¹⁹².

Conclusion. The claim that "only the investor profits" is false — the revenues will be real (7–13% of gmina revenues at 500 MW, 13–24% at 1 GW [COMPUTED]) — but the gmina's answer is a list of revenues without costs, without a number and without a mechanism: no revenue forecast, no earmarking resolution, no investor agreement, no net balance against the expenses written into the plan itself (§2.4.14). After the consultation window closed, six questions were issued: Theme 16 (Q76–Q81) in «Belchatow_Questions_EN» — strongest: Q76 (revenue forecast with assumptions), Q78 (scope and legal form of the "modernization at the investor's cost"), Q81 (net balance: revenues versus the gmina's own costs).

2.4.17 Investor information meeting in Emilin (1 September 2026) — the fourth cooling description: "immersive, like transformer cooling", still without a number or a document

The first meeting organized directly by the investor — not by the gmina. The "Data Center Belchatów project team" invited (Facebook, 31 August 2026, 14:47) residents of Domiechowice, Emilin, Zalesna and the streets Grabowa, Myśliwska, Zakątek and Łączna to a "cycle of open information meetings"; the first duty hour took place on 1 September 2026 (17:00–19:00) in the community hall of the Sports and Recreation Centre in Emilin (Emilin 21a), announced on Facebook roughly 26 hours before it began — four days after the consultation window closed (28 August): the fourth installation description arrived only after the formal comment pathway had closed ²⁰². According to residents' accounts, the cooling solution was presented there as **"chłodzenie immersyjne"** ("immersive cooling" — the Polish calque was the reported spoken word) — similar to what is used "in transformer cooling" — with no number, variant, or document [UNVERIFIED - oral account from the meeting; recording pending]. This is the fourth description of the cooling installation in four months — the first spoken directly by the investor and the first to name a technology family; like the previous three (§2.4.10), it is accompanied by no document.

What this technology actually means — the honest half. Immersion cooling submerges servers in a tank of circulating dielectric fluid — a typical vat is roughly $3 \times 1.5 \times 1.5$ m and above 150 kW of load ²⁰³; in the single-phase variant a hydrocarbon fluid absorbs heat and releases it in a heat exchanger, in the two-phase variant it boils and condenses ²⁰⁷. The description is engineering-consistent with the "Myth #3" topology: immersion at the server-room level, a sealed dry loop with coolers at the campus level; exactly this architecture (immersion tanks + dry coolers "for immersion", 60/40°C fluid, chillers off for most of the year) is offered in Poland by, among others, the manufacturer DCX ²⁰⁸. If such a system were actually built, the "no water for cooling" promises of Myths 2–3 become physically achievable without linguistic contortions: waterlessness is delivered by **the dry heat-rejection loop, not by immersion itself** — Microsoft reaches "zero water" on cold plates (D2C, not immersion) ¹³⁴, and dry coolers consume no water with any liquid technology ²⁰⁵.

The transformer analogy — half honest. A single-phase dielectric bath is a century-old technology: this is how power transformers are cooled (ONAN/ONAF classes per IEC 60076), and modern immersion fluids — synthetic hydrocarbons (PAO) and esters, flash point around 160°C — belong to the same chemical and fire family as transformer oil ^{208 · 213}. But the analogy passes over three decisive differences. (1) **Scale of fluid:** a 100 MVA transformer holds ~ 30 m³ of oil; immersion at 500 MW IT requires, by market indicators, 10–15 L/kW, and by industry vat geometry — 34–45 L/kW, i.e. roughly **5,000–22,500 m³ of dielectric (2–9 Olympic pools)** and **~ 30 – $160 \times$ more fluid per unit of power**; the fluid alone is on the order of USD 15–270 million [COMPUTED - both indicator sources given openly: 10–15 L/kW vs 34–45 L/kW] ^{213 · 203}. (2) **Serviceability:** a transformer is a hermetic device designed for 30–40 years of operation; servers are replaced every 3–5 years — pulling and re-submerging the whole fleet, oily residues ("oil blooms") and OEM warranty questions are the main reasons the industry chose direct-to-chip plates over immersion for AI compute ^{203 · 212}. (3) **Silence:** a transformer rejects heat passively; an immersion campus must still reject 500+ MW of heat through a fleet of dry coolers — ~ 445 units of the 1.236 MW class at 60/40°C fluid [COMPUTED] ²⁰⁸, with catalog noise of 64–73 dB(A) at 10 m ¹⁴³ — so the noise contour from §2.4.12 is unchanged.

A scale without precedent — and the question of variant. The largest known single-site immersion deployment in the world is Riot Platforms' Corsicana complex (Texas): 400 MW — but that is a Bitcoin mine, not an AI compute campus ²⁰⁴. In AI workloads immersion "has yet to see uptake" ²⁰³; 80–90% of the liquid-cooling market is direct-to-chip (D2C — name guide: §3.2) ²¹²; the NVIDIA GB200/GB300 NVL72 — the dominant AI server platform — uses cold plates, not immersion ²⁰⁵, and Google has liquid-cooled at 1 GW scale on cold plates since 2018 ²⁰⁶. A full 500 MW immersion campus would be the

largest such facility in the world ($\sim 1.25\times$ Corsicana) and the first in AI [COMPUTED]. The presentation did not even specify the variant: **single-phase** (hydrocarbon fluids, PFAS-free) or **two-phase** (fluids by definition containing PFAS — the main manufacturer, 3M, ended their production by the end of 2025²¹¹, and the EU-wide PFAS restriction under REACH is in its final procedural stage — the final ECHA consultation closed 25 May 2026, opinion expected in late 2026²¹⁴). A peer-reviewed LCA published in *Nature* (authors affiliated with Microsoft — an operator, not a vendor of this technology) attributes to liquid cooling — plates and immersion together — moderate benefits versus air: $-15\text{--}20\%$ energy and $-31\text{--}52\%$ water, with immersion alone at $45\text{--}48\%$ for water²⁰⁷ — not "zero" and not "nothing".

The biggest unused card: heat. Immersion delivers heat in a fluid at $52\text{--}60^\circ\text{C}$ — this is full-grade district heat: 1 MWe of data center corresponds to ~ 1 MWt for a municipal network, and $40\text{--}50$ MWe covers $\sim 75\%$ of the heat demand of a 30,000-resident town²⁰⁹. The city of Belchatów — heated from the Belchatów Power Plant (373.8 MWt)¹⁴⁷, $\sim 90\%$ of households — has been formally searching since April 2025 for a new heat source for the period after the plant's shutdown (2035–2036; demand: 100 MW)²¹⁰. A 500 MW campus near Emilin is potentially a multiple of the city's heat needs — and in the environmental forecast the word "district heating" does not appear even once (full-text verification of the planning documents; method as in §2.4.10): no one has analyzed either heat reuse or its absence [A · BIP]. The template exists: in Espoo, a data center covers 40% of the heat network's annual demand²⁰⁹.

Conclusion. For the fourth time since June — including two descriptions on a single day (25 August) — residents received a description of the same installation — June: circulating water and a rainwater tank; "Myth #2": water "will not be used for cooling"; "Myth #3": a hybrid dry loop; September: "immersive cooling" like in transformers — orally, without a document — and still: not a single design number, no technology variant, no supplier contract, and no occurrence of the word "cooling" in any of the five planning documents (full-text verification with OCR — §2.4.10). Technically possible, legally non-existent — and at 500 MW without precedent anywhere in the world. Six new questions: Theme 17 (Q82–Q87) in «Belchatow_Questions_EN» — the strongest: Q82 (written technology specification with numbers), Q86 (heat-reuse analysis for the Belchatów network in the EIA report).

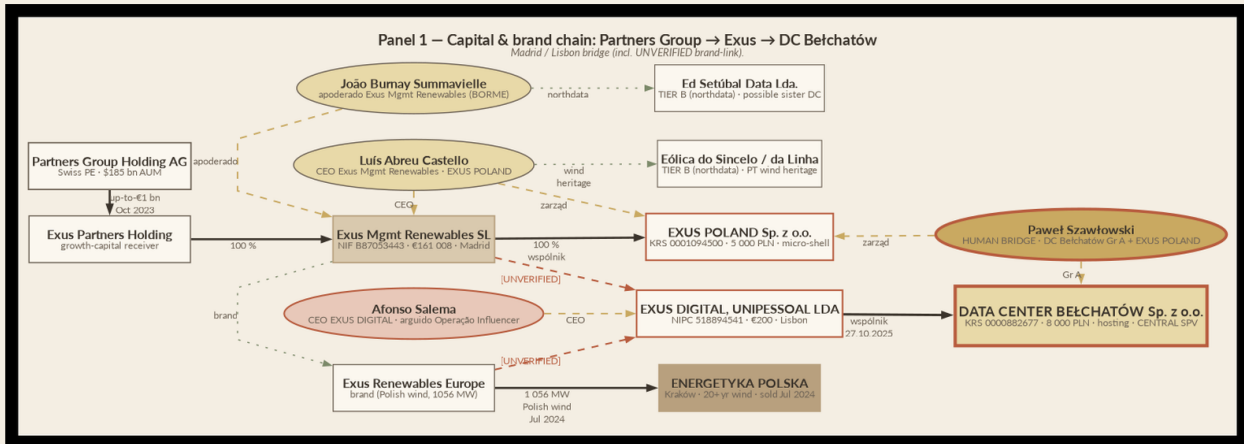
Corporate-connections graph – Bełchatów DC investor network

Nodes + edges publicly verified (KRS / rejestr.io / Portuguese registry / BORME / northdata / press).
KRS / NIPC / capital / tier in connections_data.mdx. Szawłowski = the human bridge.

KEY FINDING

↓ Paweł Szawłowski = the HUMAN BRIDGE ↓

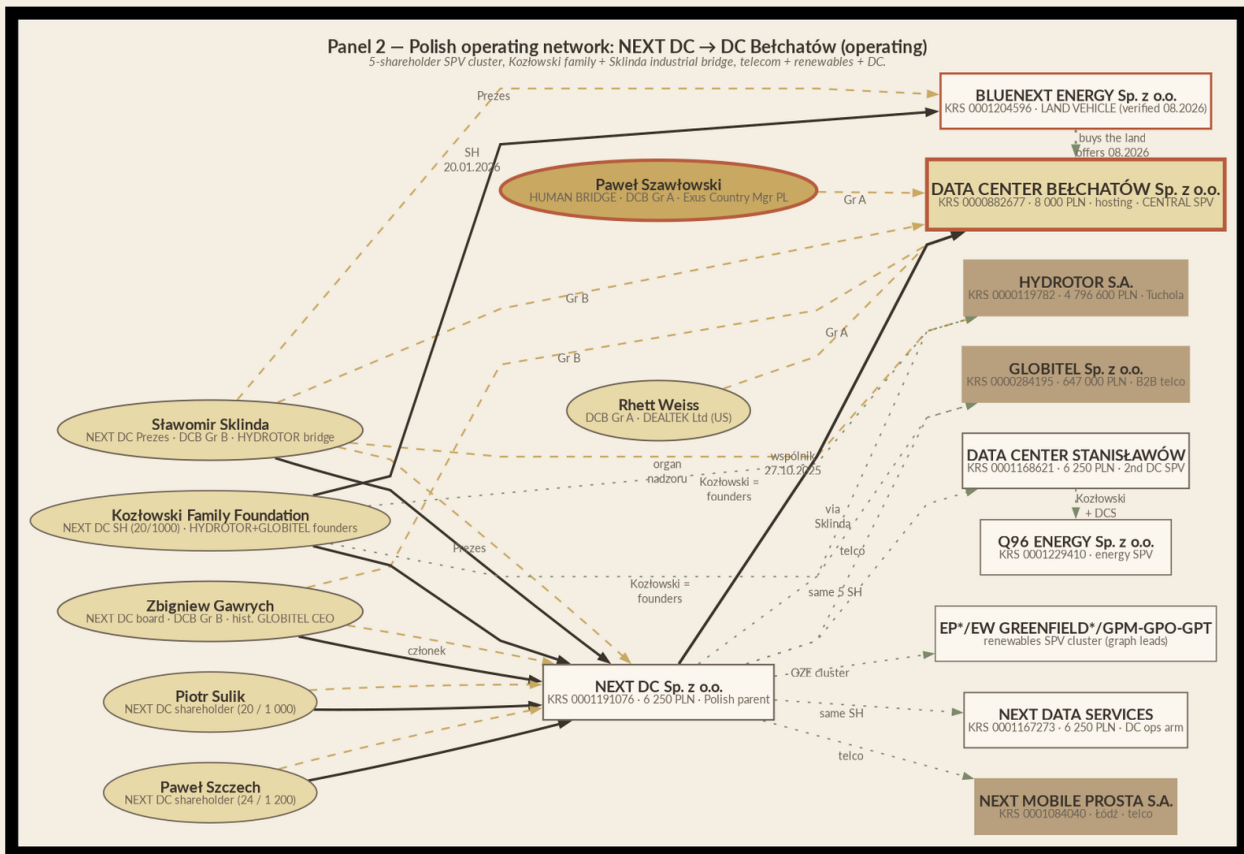
Gr A shareholder of DC Bełchatów SPV + zarząd EXUS POLAND Sp. z o.o. + Country Manager Poland, Exus Renewables Europe.
The single public persona connecting the Madrid chain ↔ the Polish operating network (see Panel 1 right + Panel 2 centre).



POLISH OPERATING CLUSTER

5 shareholders of NEXT DC + Kozłowski family office + Skłinda industrial bridge

Sulik - Szczecznik - Kozłowski Foundation - Skłinda - Gawrych → NEXT DC → DC Bełchatów + DC Stanisławów + NDS + operating telco + HYDROTOR.
Two DC SPVs (Bełchatów + Stanisławów) sit on the same 5-shareholder base; Kozłowski family = HYDROTOR + GLOBITEL founders.



Edge styles: — ownership — solid — board — dashed — affiliation — dotted — brand-link UNVERIFIED (?+dashed)

Node categories: central SPV operating co. micro-shell SPV public persona (KRS) human bridge (Szawłowski) brand-link UNVERIFIED / TIER B

Public sources: KRS krsly.pl / krs-pobierz.pl / bizraport.pl - rejestr.io - Portuguese registry (Portal da Justiça / NIPC) - Spanish BORME (boe.es / infonif) - northdata.de (TIER B) - Partners Group press (Oct 2023) - Exus Renewables press (Dec 2024) - Operação Influencer. ECO, Público, Jornal de Negócios, SÁBADO - Onet (15 Jun 2026).

Figure 1. Rejestr.io corporate-connections graph for DATA CENTER BEŁCHATÓW Sp. z o.o. (KRS 0000882677) — the NEXT/GLOBITEL/ENERGETYKA cluster plus the Exus vector. Public source: rejestr.io.

2.5 Officials, institutions, and the critical voice

Strong official support. The project has the explicit backing of the full regional leadership ²: Gmina — **Wójt Dr Konrad Koc**, Przewodniczący Rady Gminy **Rafał Furczyński**, Dyrektor ds. Inwestycji i Rozwoju **Damian Marczewski**; Voivodeship — Wojewoda Łódzki **Dorota Ryl**, Marszałek **Joanna Skrzydlewska** (*"Będziemy się starać, by ta inwestycja mogła dojść do skutku"*), Wicemarszałek **Piotr Wojtysiak**, Starosta Bełchatowski **Jacek Zatorski**.

Grid-side: TSO = **PSE**; DSO = **PGE Dystrybucja** ¹⁰². The adjacent generator is **PGE GiEK Elektrownia Bełchatów** — Europe's largest lignite-fired plant at ~5.1 GWe and the EU ETS's #1 emitter since 2005 [A · MPZP UZASADNIENIE]; ²⁷.

The critical NGO voice. The most vocal critical organisation is **Fundacja Carbon Footprint (CFF)**, with spokesperson **Marta A. Seweryn**. CFF's arguments, per Polish press: the thousands-of-jobs promises are exaggerated because post-construction server farms are highly automated (*"kilkanaście lub kilkadziesiąt osób"*); *"lokalna społeczność zostaje z pełnym kosztem środowiskowym, podczas gdy zyski wypływają z kraju"* (community bears full environmental cost, profits leave the country); CFF warns of *"ryzyko osuszania gospodarki"* (water competition with agriculture and industry), and cites USA, Ireland and Uruguay as jurisdictions where similar projects were suspended after protests ¹⁰¹. Resident concerns cluster on **24/7 industrial noise disrupting sleep, EMF, toxic e-waste, and drinking-water access**, on top of the existing water conflict with KWB Bełchatów ¹⁰¹.

Onet reporting carries human voices. A female farmer: *"Po mojemu ziemia jest po to, żeby rodziła, a nie na fabrykę inteligencji."* A neighbour: *"Do szumu już wszyscy tutaj przyzwyczajeni przez obwodnicę. Ale czym oni tę fabrykę inteligencji będą chłodzić, to nie wiem, bo w Widawce, najbliższej od nas rzece, wody tyle, co kot nasikał."* All residents quoted asked Onet not to publish their names ¹⁰⁰.

Chapter 3 — How a Hyperscale AI Data Centre is Actually Built: a plain-language technical primer

This chapter is written for residents who are **not** engineers. It explains the physical reality of a 500 MW–1 GW AI campus — cooling, power, water, noise, backup — and ties each topic to **what the draft MPZP does and does not lock in**. The "gaps list" at the end of each sub-section is the bridge to the questions in the separate Questions sheet («Belchatow_Questions_EN.pdf»).

3.1 Why AI changes everything: thermal density

A traditional enterprise data-centre rack draws **5–15 kW** of electrical power and rejects the same amount as heat ²¹ ASHRAE TC 9.9 5th edition. An AI-training rack full of GPUs (NVIDIA Hopper/Blackwell class) draws **40–100+ kW**, with ASHRAE anticipating "*megawatt-class racks*" in the near future ²⁰ ASHRAE AI Data Center Framework. The implications are not incremental:

- Air cooling (the legacy default) becomes physically impractical above ~30 kW/rack.
- The cooling medium shifts from air to **liquid**. This is non-optional for AI workloads at scale.
- The site's heat-rejection infrastructure — cooling towers, chillers, dry coolers — becomes a major physical and acoustic presence, comparable in scale to a chemical-plant utility block.

A 500 MW–1 GW AI campus is therefore not "a big server room". It is closer, in industrial character, to a process plant that happens to do computation: continuous multi-hundred-megawatt heat rejection, large electrical switchyards, diesel/gas standby generation, and significant water demand for cooling-tower make-up.

3.2 Cooling options — and the "closed-loop" question

The realistic menu: **air cooling / CRAH** (legacy default, viable to ~30 kW/rack); **rear-door heat exchangers** (adds 20–60 kW/rack ²¹); **direct-to-chip liquid cooling (D2C, supply 28–30 °C, de-facto standard for AI racks >60 kW ⁸⁹)**; **single-phase immersion** (PUE ~1.02–1.1); **two-phase immersion** (historically PFAS-dependent, under EU REACH scrutiny — regulatory future could strand assets); **evaporative/adiabatic** (trades electricity for water); and **once-through** (river/lake/sea) — for an inland campus of this scale effectively unpermittable in the EU (analysis: the Water Framework Directive's no-deterioration rule and abstraction licensing; Nordic seawater-cooled sites are the exception). The realistic European menu is **(a) closed loop with evaporative towers + D2C** (make-up in the thousands of m³/day at 500 MW — §3.4), **(b) hybrid/adiabatic**, or **(c) sealed dry loop** — and the choice between them appears in no project document.

A guide to reading cooling-technology names (air, plates, immersion). Names heard at meetings come from three families. (1) **Air cooling (CRAH/CRAC)** — cold air via underfloor plenums or ducts, the server fans itself; practical limit ~30 kW/rack. (2) **Direct-to-chip liquid cooling (D2C, DLC, "cold plates")** — what actually cools AI data centers: metal plates with microchannels bolted directly onto CPUs and AI accelerators, through which circulates **ordinary treated water with glycol** (as in a building's heating system), discharged via a CDU heat exchanger to the campus loop; the rest of the server (memory, drives, power supplies) may still be air-cooled ^{205 · 212}. Servicing looks almost exactly as with air, and the plates are covered by manufacturers' standard warranties — which is why D2C today

holds **80–90% of the liquid-cooling market**²¹². This is how Google cools (1 GW scale, 2,000+ TPU pods, since 2018)²⁰⁶, how Microsoft's new AI facilities work (the "zero water" design from August 2024 — chip-level cooling in a sealed loop; its numbers in public verification: §2.4.9)¹³⁴, and how the reference AI rack NVIDIA GB200/GB300 NVL72 at ~120 kW is built²⁰⁵. (3) **Immersion cooling** — the whole server in a dielectric bath; mechanics, scale analysis and the transformer analogy: §2.4.17. Meeting descriptions without a technology name (June: "water circulating in the system"; "Myth #3": "sealed coolant loop") are campus topologies — classified by §3.4, not by this guide. The key point for residents: **the server-room technology name settles neither the campus's water nor its noise** — both are decided by the campus loop (§3.4: evaporative towers / hybrid / dry) and the dry-cooler fleet (§2.4.12). Whichever name is announced — the fourth or the fifth in a row — the checklist is the same: **variant** (plates/immersion/single-/two-phase/mixed), **numbers** (PUE, WUE, cooler count and dB(A)), and **a document** (EIA report, specification, contract) — not the technology's name.

What the gmina says vs what the Ministry says. The gmina told Onet (June 2026): *"Systemy chłodzenia [...] mają pracować w obiegu zamkniętym"* — closed-loop, no open-water draw, rainwater retention pond for emergency cooling¹⁰⁰. The Ministry of Climate told the same reporter that the investor *"has not, at this stage, presented information on the scale of impact, including water consumption and the planned cooling system"*¹⁰⁰. The two statements partially contradict each other.

What the MPZP locks in. §20 makes the municipal water grid the target supply (pipe $\geq \varnothing 150$) but **explicitly permits well water (*studnie*) as an interim** and **sets no volumetric cap** [A · §20]. **No cooling-technology mandate** (open-loop, closed-loop, air, liquid all legally permissible). *Gap*: a closed-loop intent in a press article is not a binding condition; without a clause in the MPZP, the operator can legally choose any technology at the building-permit stage.

3.3 Energy efficiency — PUE in context

PUE = total facility power $\div$ IT-equipment power (1.0 = ideal). Industry-average **~1.55**¹⁸; hyperscale/colocation average **under 1.4**¹⁷; best-in-class **~1.09** (Google)⁹⁷. A realistic (our assessment) design target for a new AI campus is **~1.2–1.3**. *The MPZP sets no PUE target*. The EU EED (recast 2023, Art. 12) requires DCs ≥ 500 kW IT to **report** annually to the European Database on Data Centres³⁶, but reporting is not a binding performance standard.

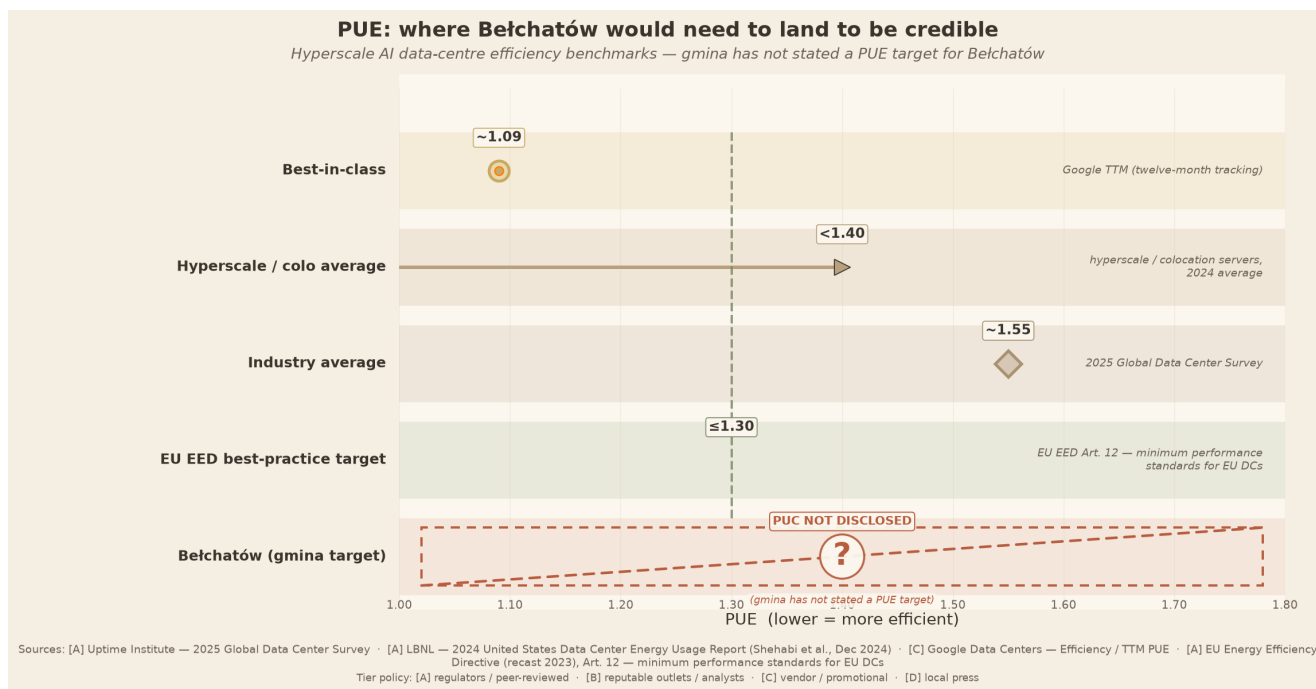


Figure 2. PUE — industry benchmarks vs the absent PUE target in the Domiechowice MPZP. Bełchatów = the missing bar.

3.4 Water — withdrawal vs consumption

Withdrawal = water taken (once-through withdraws enormous volumes, returns nearly all warmer); **consumption** = water that leaves the watershed (evaporation). How much of the withdrawal disappears depends on the **cooling topology**, not on the label — "closed loop" covers at least three configurations in industry usage. (a) **Closed loop with evaporative cooling towers**: the process water circulates in a closed loop, but heat is rejected by evaporation in the towers — consumption reaches **70–80 % of withdrawal** (the remaining 20–30 % is discharged blowdown)^{86 · 141}; this is the configuration behind the legacy installed-base WUE of ~1.9 L/kWh (EESI) and thousands of m³/day at 500 MW. (b) **Hybrid (adiabatic) loop** — dry coolers with water spray engaged only on hot days: in temperate climates water is needed for **4–12 hours per day over 5–20 days a year**¹⁸ (in central Poland's continental climate the number of spray days may be higher); consumption is intermittent and strongly seasonal. (c) **Sealed (dry) loop** — water/glycol in sealed pipes, heat rejected by dry coolers: cooling-water consumption ≈ 0 (make-up is limited to leaks — trace volumes, far smaller than the tower make-up of variant (a))⁸⁶, and all site water is domestic, humidification and fire use. Published per-site on-site consumption stretches from ~0 (Microsoft's per-campus table) to ~9 L/kWh (a large commercial site, Arizona, summer)¹⁴¹.

Order-of-magnitude for a 500 MW–1 GW AI campus at 1.9 L/kWh and 100 % capacity factor: ~22 800 m³/day for 500 MW, ~45 600 m³/day for 1 GW of consumption. [COMPUTED – UNVERIFIED pending cooling-tech & capacity-factor disclosure] The figure scales down proportionally at lower capacity factors, and tower make-up in a closed loop corresponds to only ~2–3 % of an equivalent once-through volume (1.8–3.3 % at ΔT 8–12 K and 3–5 cycles of concentration) — in absolute terms still thousands of m³/day, not zero. [COMPUTED – heat balance] For orientation, hyperscale daily water use of 3–7 million US gallons/day (≈11 000–26 000 m³/day) is reported for smaller facilities²³.

Hydrology at Domiechowice. The prognoza's §5–§6 records: no surface water on-site; a Quaternary aquifer in sand/gravel at 10–80 m depth, single-well yields 10–40 m³/h (up to 80 m³/h); site **not within a Główny Zbiornik Wód Podziemnych**; conditions rated *"korzystne"* (favourable) [A · §5–§6]. **Critical omission:** zero mention of **KWB Bełchatów mine's dewatering** on the same regional aquifer — developed in Chapter 5. The nearest river, the **Widawka**, is described by a local resident as having *"wody tyle, co kot nasikał"* ¹⁰⁰.

3.5 Electrical architecture — what 500 MW–1 GW physically means

A 500 MW–1 GW continuous load is comparable to Warsaw's average power demand (Jakub Wiech in Onet: *"To odpowiadałoby średniemu zapotrzebowaniu na moc wielkiej aglomeracji, takiej jak Warszawa"* ¹⁰⁰). 1 GW × 8 760 h/yr = **~8.76 TWh/yr**. The site will need on-site HV/EHV substations (110/220/400 kV class; permitted by MPZP §22) [A · §22], transformers (§11(3)(1)), UPS battery banks, standby diesel/gas generators (§11(3)(3)–(4) permit *agregatów prądotwórczych + zbiorników paliw*) [A · §11(3)], BESS, and solar PV / cogeneration (wind excluded under §9) [A · §9]. A greenfield 1 GW transmission connection usually takes **5–10 years** in Poland; direct co-location with the Elektrownia Bełchatów switchyard can shorten this to 2–4 years ⁵⁹.

Where the power comes from. The wójt confirmed 500 MW of connection conditions in Feb 2026 ². Latest official position: feed-in via **GPZ Kurnos**, a 110 kV substation adjacent to the Elektrownia Bełchatów switchyard ². (An earlier Feb 2026 statement referenced GPZ Rogowiec; see Q15 in the separate Questions sheet.) The adjacent generator is **PGE GiEK Elektrownia Bełchatów**, scheduled for unit-by-unit closure **2030–2036** ⁵¹; ⁵². The wójt explicitly frames the DC as absorbing the lignite plant's baseload.

Carbon arithmetic — computed, UNVERIFIED pending capacity-factor disclosure. At the Polish grid's carbon intensity of **~662 gCO₂/kWh (2023)** — among the EU's highest ²⁶ — a 1 GW DC at 100 % capacity factor would correspond to **~5.8 Mt CO₂/yr** of Scope-2 emissions (range **5.3–6.1 Mt** at 600–700 g/kWh); a direct lignite PPA would raise this to **~8.3 Mt CO₂/yr** (~1.4× the grid-average intensity, at lignite ~950 g/kWh) [COMPUTED - UNVERIFIED for actual capacity factor]. **The MPZP sets no carbon-intensity or renewable-energy mandate.**

3.6 Noise sources — and what "dB(A)" hides

A hyperscale AI campus has distinct noise sources: **cooling towers** (broadband, continuous), **chillers** (compressor + fans), **standby generators** (loudest during weekly/monthly **test runs**), **transformers** (characteristic **100 Hz hum** + bushing corona; **low-frequency**, propagates further, penetrates walls), **UPS** (fan/inverter whine), and **switchgear** (HV corona, switching bangs).

The A-weighting issue. dB(A) deliberately *down-weights* low frequencies. But the low-frequency tonal components of transformers and generator exhausts are what residents experience as a penetrating hum that double-glazing does not block. WHO 2018 explicitly notes this ¹¹.

WHO anchors. WHO *Night Noise Guidelines for Europe* (2009) recommends **L_{night,outside} 40 dB** to protect public health (55 dB interim) ¹⁰. WHO 2018 *Environmental Noise Guidelines* set per-source values (road L_{night} 45 / L_{den} 53 dB; aircraft L_{night} 40 dB) but did **not** set a strong industrial-noise recommendation ¹¹. The EEA attributes **~48 000 new CVD cases and ~73 000 premature deaths/year** in the EU to environmental noise ¹². **No vendor-neutral dB-by-boundary dataset exists for AI-class GPU DCs.**

What the MPZP locks in. Nothing numeric. §11(4) requires that impacts not exceed environmental-quality standards *outside the investor's property*; specific dB limits deferred to "standardy jakości środowiska" and the future environmental decision [A · §11(4)]. *Gap:* dB(A) and dB(C) (low-frequency) ceilings plus **generator-test-hour limits** should be written into the MPZP or DŚU.

3.7 Backups and resilience

Uptime Tier III = concurrently maintainable, N+1, ~99.982 % ($\approx$ 94 min/yr outage). **Tier IV** = fault tolerant, 2N, ~99.995 % ($\approx$ 26 min/yr)¹⁸. For 500 MW–1 GW AI training, most hyperscalers target Tier III with selective Tier IV for the control plane — AI training with checkpointing is more interruption-tolerant than classical enterprise IT. **Standby diesel/dual-fuel generators are universal**; a 500 MW–1 GW Tier III facility typically carries N+1 generator capacity in the hundreds-of-MW range — at the typical 2.5–3.25 MW unit class, on the order of a few hundred units (§2.4.12) — with 24–96 h fuel storage. **No limit on aggregate count, fuel-tank size, or test-run hours is written into the plan** [A · §11(3)]. BESS is increasingly used for peak-shaving/UPS hybridisation but cannot yet substitute for multi-day backup; **MPZP sets no BESS size limit**.

3.8 The cumulative picture, and the MPZP gap list

Taken together, the technical reality is this: a 500 MW–1 GW AI campus at Domiechowice would be a continuous-duty process plant, with multi-hundred-megawatt heat rejection, on-site HV/EHV substations, a standby-generator fleet numbering in the hundreds (§2.4.12) with significant on-site fuel, a substantial water draw (legally uncapped under §20), and 30-metre-tall halls (the maximum permitted under MPZP §28(3)(g)) on a currently agricultural site with no neighbouring buildings [A · §28(3)]. Its PUE, WUE, cooling technology, noise ceilings, EMF limits, waste-heat reuse plan, carbon intensity and battery-storage size are **all deferred to the future environmental decision** — none are written into the draft MPZP [A · §11, §20–§26].

The MPZP gap list (consolidated) — these are the items where binding conditions *could* still be written in during the consultation window that closes **28 August 2026**:

1. No noise (dB(A) or dB(C)) ceiling at the property line.
2. No EMF limit from HV/EHV substations.
3. No volumetric water-draw cap; no cooling-technology mandate (closed-loop stated in press, not in plan).
4. No PUE / WUE / energy-efficiency mandate.
5. No waste-heat reuse mandate (despite the EU EED Art. 26(6) obligation for DCs >1 MW, and despite Belchatów town's existing PGE district-heating footprint).
6. No limit on standby-generator count, fuel-tank size, or test-run hours.
7. No BESS size limit.
8. No landscape berm, screening, or green-roof requirement.
9. **No requirement that a data centre actually be built.** The use is "*dopuszcza się*" (permitted), not required. The MPZP locks in *land-use rights*; the substantive operating conditions shift to the building-permit / environmental-decision stage, where the residents' consultation rights are narrower.

These nine gaps are the bridge from this chapter to the separate Questions sheet. Each gap is, in planning terms, a question that can still be put on the table before 28 August.

Chapter 4 — Power: what 500 MW–1 GW means, and the Bełchatów energy question

4.1 The scale of the load

A 1 GW continuous load = **8.76 TWh/yr** ($1 \text{ GW} \times 8\,760 \text{ h}$); Phase 1 (500 MW) = $\sim 4.38 \text{ TWh/yr}$ ¹⁵. Wójt Dr Konrad Koc confirmed "500 MW dla tej inwestycji już zostało przyznane" — grid-connection conditions, not a supply contract¹⁰⁰. 1 GW is comparable to all of Ireland's DC sector combined, a major aluminium smelter, or Warsaw's average power draw⁵⁰; ¹⁰⁰. Caveat: a "small city" comparison averages over 24 h, whereas an AI training load runs **near nameplate continuously**¹⁷. The 500 MW Phase-1 figure equals roughly **10% of Elektrownia Bełchatów's nameplate capacity**.

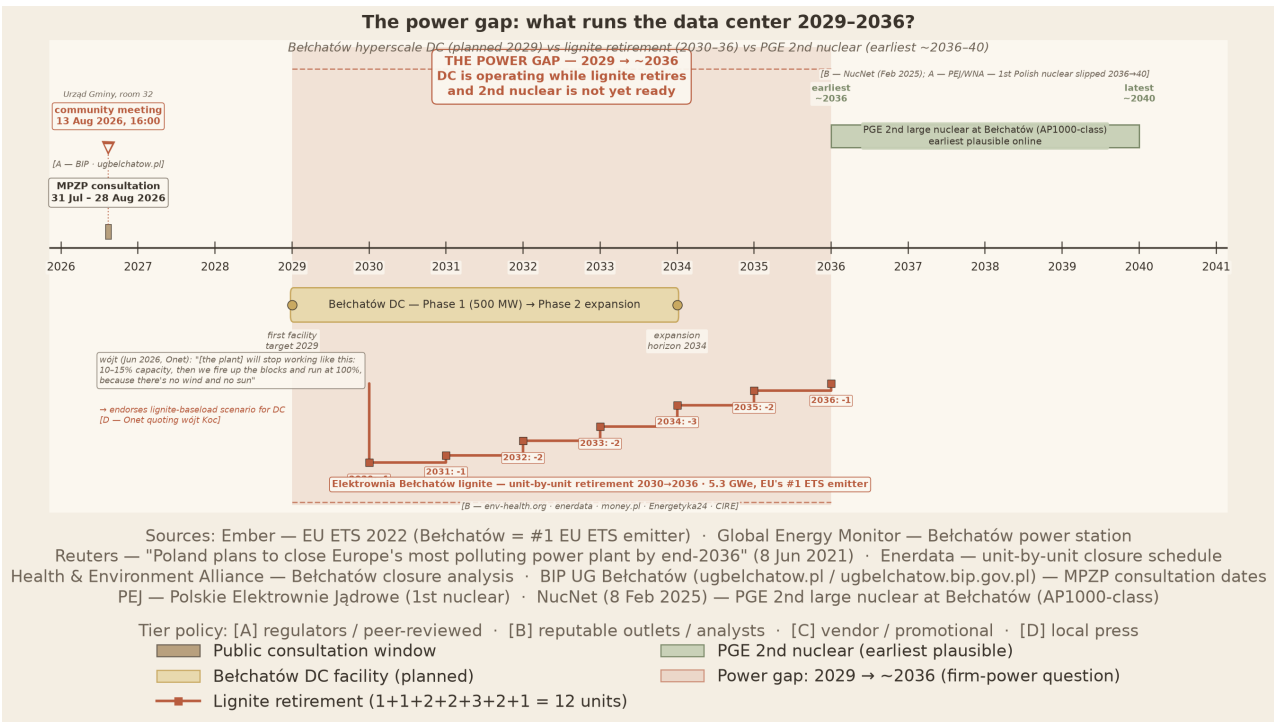


Figure 3. Project timeline vs MPZP consultation window, lignite retirement, and the 2nd-PGE-nuclear-plant horizon.

4.2 Elektrownia Bełchatów — 5.1 GW lignite, closing unit-by-unit 2030→2036

Elektrownia Bełchatów (operated by PGE Polska Grupa Energetyczna, state-controlled) is the EU's largest lignite-fired plant and its #1 EU ETS emitter since 2005 — 11 units of ~ 370 – 390 MW each (Bełchatów I) plus 1 unit of ~ 858 MW (Bełchatów II, unit 14), total $\sim 5.1 \text{ GWe}$ ²⁷; ⁵¹; ⁶⁹. The unit-by-unit closure schedule, from PGE's *Terytorialny Plan Sprawiedliwej Transformacji Województwa Łódzkiego* (8 June 2021):

Year	2030	2031	2032	2033	2034	2035	2036
Units closed	1	1	2	2	3	2	1 (full retirement)

⁵³; ⁵². The linked mine fields: existing Bełchatów pit ends 2026, Szczerców pit 2038, the planned third Złoczew deposit abandoned as "trwale nierentowne"⁵⁴.

Bindingness. The 2030–2036 schedule is **not a Polish statute** (no *Kohleausstiegsgesetz* equivalent). It is binding in practice via three mechanisms ⁵⁵: (1) **EU Just Transition Fund conditionality** — Łódzkie's JTF access depends on PGE honouring the schedule; (2) **EU ETS economics** — lignite emits ~0.95–1.05 t CO₂/MWh; at €70–100/t ETS, fuel + carbon cost reaches €70–100/MWh, persistently above wholesale power most hours ²⁷; (3) **policy continuity** — both PiS (to Dec 2023) and Tusk coalition (since) reaffirmed the schedule. **Bottom line:** credibly binding in practice, not a statutory hard deadline. Most likely deviation is *slight acceleration* under ETS pressure. A DC opening 2029–2030 runs on a power source being retired underneath it during its first 6–7 years.

4.3 PGE's 2nd large nuclear plant at Bełchatów — corrected from "SMR"

The "PGE SMR" framing is **incorrect**. Poland's SMR pipeline is led by **Orlen** (BWRX-300, Włocławek, agreement Aug 2025, commercial mid-2030s) ⁵⁷, plus KGHM and SGE. What PGE has done at Bełchatów is **complete the first stage of analysis for a *second* large commercial nuclear station on the coal site — technologically neutral** (reactor technology to be selected; ~1 GWe+/reactor scale), the second Polish commercial station after **Lubiatowo-Kopalino** (3× AP1000, ~3 GW, construction Q4 2028, online 2036–2040) ⁵⁶; ⁴⁵; ⁴⁶. **Why it matters:** if a 1 GW DC opens 2029–2030, the PGE 2nd nuclear plant is **not realistically available before ~2040** — a decade of DC operation under non-nuclear power.

4.4 Grid: PSE, PGE Dystrybucja, Łódzkie congestion, and the GPZ discrepancy

PSE operates the ≥220 kV transmission system; PGE Dystrybucja is the regional DSO at ≤110 kV. PSE confirmed in 2025 that developers had submitted motions to connect **~130 GW of data centres** — far beyond grid capacity ⁵¹. As of August 2026, PSE estimates this queue at 150–200 GW and has already issued connection conditions for data centres with a combined capacity of more than 6 GW — only a dozen-plus real applications remain after the deposit reform ¹⁷⁰; in its network-development planning PSE assumes 3.1 GW in 2036 and 5.0 GW in 2040 (SWS weather scenario) ¹⁶⁹. The cabinet backed energy-law changes on 7 Jan 2026 to prune "ghost projects" (*puste inwestycje*) ⁵⁹. IEA: grid congestion cost the EU **€4.3 bn in 2024**, ~20% of European DC projects at risk ¹⁵. Domiechowice sits in the **Łódzkie grid area**, a constrained node per DNV ⁶⁰.

GPZ Rogowiec-vs-Kurnos discrepancy. The 110 kV feed-in substation named in official statements changed during 2026: Feb 2026 (ugbelchatow) = **"GPZ w Rogowcu"**; Apr 2026 (ebelchatow) and Jun 2026 (Onet) = **"GPZ w Kurnosie"** ^[A/D]. Latest official = **GPZ Kurnos**; Rogowiec appears to have been an imprecision later corrected. Both substations are PGE-owned, adjacent to the Elektrownia Bełchatów switchyard. **Q15 (see the separate Questions sheet):** which GPZ feeds the campus, and which 110 kV lines cross which properties — confirm in writing.

4.5 Carbon arithmetic — the implied footprint

[COMPUTED - UNVERIFIED pending capacity-factor disclosure]

Polish grid carbon intensity was **662 gCO₂/kWh in 2023** — highest among the EU's three largest coal-power countries ²⁶. Coal share 51% in 2025 ²⁸. For a **1 GW DC at 100% CF** drawing grid-average Polish power: at 600 g/kWh = **5.26 Mt CO₂/yr**; at 662 g/kWh = **5.80 Mt**; at 700 g/kWh = **6.13 Mt**. **Range: 5.3–6.1 Mt CO₂/yr**. For Phase 1 (500 MW): **2.6–3.1 Mt CO₂/yr**. Elektrownia Bełchatów at

full output emits **~27–30 Mt CO₂/yr** (PGE GiEK actuals) — the DC's ~5.8 Mt adds **~18–23 % on top**²⁷.

Caveat 1 — capacity factor. Assumes 8 760 h/yr. AI training approaches 100% CF; enterprise DCs 60–80%. The wójt's framing (DC absorbs lignite baseload throttled by renewables) implies near-100% CF — so the figure is an upper bound, but tight. **[COMPUTED - UNVERIFIED pending CF disclosure]**.

Caveat 2 — the PPA counterfactual. An annual-matching renewable PPA for 8.76 TWh/yr lets **market-based** Scope 2 claim ~0 g/kWh; **location-based** Scope 2 (what physically happens) stays at 5.3–6.1 Mt CO₂/yr, because the DC still draws grid power — mostly lignite — at night and in winter when contracted renewables aren't generating¹⁵. A genuine **24/7 CFE PPA** would require firming that doesn't yet exist at scale in Poland. A **direct lignite PPA** (~950–1 050 g/kWh) would raise the footprint to **~8.32 Mt CO₂/yr** at 950 g/kWh — i.e. raising the grid-average figure by ~44 % (lignite intensity ~1.4× Polish grid average). The wójt's Onet statement explicitly endorses this counterfactual¹⁰⁰.

4.6 The firm-power question — what powers the DC in years 5–20?

This is the central energy question. AI training wants **24/7 firm power**; renewables are intermittent; storage at scale doesn't yet exist in Poland; lignite retires 2030–36; large nuclear at Bełchatów is not before ~2040. If the DC opens 2029–2030, **years 5–20 correspond to 2034–2050**. Realistic scenarios: **S1 continued lignite** (firm + adjacent, but 8–9 Mt CO₂/yr until 2036, "coal-powered AI" — the wójt's implicit plan); **S2 annual PPA + RECs** (market-based "net zero" claim, but physical grid power mostly lignite — greenwashing risk); **S3 renewable + battery** (real progress, but GWh-scale BESS is 5–10 yr away, doesn't solve Dunkelflaute); **S4 imported HVDC** (clean but cross-border constrained, 7–10 yr build); **S5 PGE 2nd nuclear** (best technical match, but **not before ~2040**); **S6 Orlen/KGHM SMR** (right-sized but slipped globally, first Polish commercial SMR mid-2030s, hundreds of MWe not GWe). **No scenario credibly delivers 24/7 firm clean power for a 1 GW DC at Bełchatów between 2029 and 2036** except S1 with carbon penalty or S2 with greenwashing risk. **What is the firm, contracted power source for years 5–20?**

Chapter 5 — Environmental and ecological risks

5.1 Lead finding — the gmina's own environmental forecast does not address the dominant environmental feature of the site

The 41-page prognoza that accompanies the draft MPZP for Domiechowice was prepared by a **single named author**, Łukasz Beń, signed in Bełchatów on **28 July 2026**, under art. 51 ust. 2 of the ustawa z 3 października 2008 r. o udostępnianiu informacji o środowisku... (Dz.U. 2026 poz. 670)

[A · PROGNOZA, AUTHOR'S DECLARATION §14].

This document, sitting **5–15 km from Europe's largest lignite power plant + lignite mine**, contains **zero mention** of either. A full-text search of the 1 841-line file returns no hits on "Elektrownia", "Bełchatów Power", "kopalnia" (mine), "węgiel" (coal), "lignit" (lignite), "KWB", "Rogowiec", "Kurnos", "PGE", "EU ETS", or "emisja CO" [A · PROGNOZA FULL TEXT]. The cumulative-impact section (§11.10) limits its analysis to **traffic on droga krajowa nr 74 (dk74)** [A · §11.10].

The prognoza also **self-contradicts on air quality**. Its own §7 baseline (citing WIOŚ 2024) records the Łódź Zone as **PM10 klasa C — "przekracza obowiązujące stężenie dopuszczalne" (exceeds the binding limit)** [A · §7]. Yet the impact conclusion in §11.11.F nonetheless asserts that air emissions from the DC *"nie powinny powodować przekroczenia dopuszczalnych norm jakości powietrza poza granicami terenów inwestycyjnych"* [A · §11.11.F]. The prognoza's own baseline data contradicts its impact conclusion.

Additional structural failures of the prognoza, presented factually — these are the document's own record:

- **Noise:** conclusion rests on the single phrase *"brak zabudowy mieszkaniowej w bezpośrednim sąsiedztwie"* ("no housing in immediate neighborhood"), but **cites no measured dB baseline, no acoustic-survey methodology, no distance-to-nearest-residence map**, and never references the WHO night-noise threshold [A · §11.10; §11.11.B].
- **Water quantity:** concedes demand *"może być większe"* ("may be greater") but gives **zero m³/day figure** for a project the gmina separately claims is 500 MW–1 GW [A · §11.15].
- **GHG / climate: total silence** — no analysis of operational CO₂, Scope-2 emissions, or Polish grid carbon intensity. The "klimat" section (§11.11.I) discusses only local topoclimate [A · §11.11.I].
- **EMF: silent**, despite MPZP §22 permitting high-voltage substations on-site [A · PROGNOZA; MPZP §22].
- **Monitoring:** recommends **no site-specific monitoring** for the 500 MW–1 GW campus — *"Nie przewiduje się konieczności wprowadzania odrębnego, specjalnego systemu monitoringu wyłącznie dla potrzeb niniejszego planu."* [A · §11.3].
- **Alternatives:** only the do-nothing option is considered; the prognoza explicitly declines to consider alternative locations or technologies [A · §11.13].
- **Authorship:** a single individual (16 years' experience, Gospodarka Przestrzenna PW degree), not a multi-disciplinary consultancy — legal under art. 74a ust. 2 uioś, but below the standard typical for major Polish infrastructure projects [A · §14 AUTHOR'S DECLARATION].

This is presented factually because the omission is a serious gap: the gmina's own environmental record does not address the dominant environmental feature of the site — the lignite complex next door.

5.2 Domain-by-domain: prognoza claim vs independent evidence

Water. The prognoza's §5 describes the underlying **Quaternary aquifer** (10–80 m depth, water table 2–10 m, single-well yields 10–40 m³/h up to 80 m³/h) and concludes hydrogeological conditions are "*korzystne*" (favourable) [A · §5-6]. **Critical omission:** the prognoza contains zero mention of **KWB Bełchatów's existing mine-dewatering operations** — the lignite mine pumps hundreds of millions of m³/yr of groundwater out of the same regional aquifer system to keep the pit dry. The "*korzystne*" verdict is presented in complete isolation from the mine's regional drawdown cone.

For a hyperscale AI DC, the industry-average on-site water consumption is **~1.9 L/kWh** (the **legacy installed-base** average ⁸⁵ EESI), with published per-site on-site consumption stretching from ~0 to ~9 L/kWh ¹⁴¹. **For new-build (2026) AI clusters the fairer benchmark is DLC-liquid-cooled fleets: AWS 0.12 L/kWh (2025) ¹³³, Microsoft 0.30 (FY2024) ¹³⁴, US average per LBNL 0.45–0.48 post-2023 ¹³², Meta ~0.2–0.3 ¹³⁵.** At 500 MW IT (12 GWh/day) this yields **~1 400–21 600 m³/day** (AWS fleet → legacy base; upper bound at 1.8 L/kWh — 1.9 → 22 800); double at 1 GW. The figure scales down proportionally at lower CF. Terminological note: these are **consumption** figures for designs that evaporate water (towers consume 70–80 % of withdrawal); "closed loop" in the sense of a **sealed/dry** loop would mean cooling without water — at the level of the "Myth 2" promise (~50 m³/day, WUE ≈ 0.004) — but no project document commits to that (§2.4.9, Q31; the 25 Aug "Myth #3" post describes exactly the sealed variant — §2.4.10) — [COMPUTED - UNVERIFIED pending cooling-tech & capacity-factor disclosure]. The "Myth #2" post of 25 August 2026 promises **50 m³/day total consumption** (implied WUE ≈ 0.004 L/kWh) — ~29–115× below reference fleets (29× vs the best, AWS 0.12 L/kWh; 115× vs the LBNL average 0.48), i.e. consistent only with a fully waterless design (Microsoft announced Dec 2024, first deployments ~2027; Meta describing from 2025 ^{134 · 135}); no project document contains such a commitment — full analysis in §2.4.9. The gmina told Onet the cooling will be **closed-loop**, with a rainwater retention pond for emergency cooling. But the Ministry of Climate told Onet the investor "*na obecnym etapie nie przedstawił informacji na temat skali oddziaływania [...] w tym wielkości zużycia wody oraz planowanego systemu chłodzenia*" — i.e. **the gmina's press claim and the Ministry's official record partially contradict each other.** ¹⁰⁰ Onet quoting Ministry of Climate. The MPZP permits well water as interim (§20), so the operator may legally pump the Quaternary aquifer before the municipal water grid reaches the site; there is no volumetric cap.

Noise. Three thresholds often get conflated; they must be kept separate. (1) **WHO NNG 2009** — the genuine "40 dB" source: Lnight,outside 40 dB to protect public health (55 dB interim). **Voluntary, not binding.** ¹⁰. (2) **WHO ENG 2018** — *no single 40 dB threshold*; per-source values (road Lden 53/Lnight 45 dB; aircraft Lnight 40 dB); **explicitly did NOT set a strong industrial-noise recommendation** (insufficient evidence) ¹¹. (3) **EU END 2002/49/EC** — 55 dB Lden / 50 dB Lnight are **mapping/reporting thresholds, not health limits** ³⁸.

The binding Polish rozporządzenie (Dz.U. 2014 poz. 112) Annex Table 1 limits at the receptor ³¹:

Class	Protected type	Roads/rail LAeq D/N	Other (industrial) LAeq D/N
1	Hospitals; spa zone A	50/45	45/40
2	a) single-family housing; b) children; c) care homes; d) city hospitals	61/56	50/40

3	Multi-family; recreational; residential-services	65/56	55/45
4	City-centre >100k	68/60	55/45

Because we live in Domiechowice, **our homes are the receivers** and fall in **class 2a** (single-family housing / residential-agricultural protection) under Annex Tabela 1 of the rozporządzenie — i.e. the **stricter residential value** applies at our plot boundaries, not the more permissive industrial-adjacent class. The binding ceiling is therefore **LAeqD 50 / LAeqN 40 dB** for industrial sources. The 40 dB night ceiling coincides with the WHO 2009 NNG health target — coincidence, not design. **The MPZP writes in no dB cap**; all numeric limits deferred to the future DŚU. Low-frequency/tonal components of diesel generators, transformers, cooling-tower fans are **under-weighted by A-weighting** per WHO 2018^{11, 13}.

Air. Standby-generator emissions are the dominant DC-specific air concern. The Harvard C-CHANGE / Frontiers 2026 study quantified backup-generator emissions from a single large AI cluster (Virginia-equivalent) at **\$53–99 million/yr in health damages** from NO_x and PM_{2.5}²⁵ Harvard; ²⁴ Frontiers in Climate 2026. Adding standby-diesel + UPS + traffic emissions to an air-shed already in PM₁₀ klasa C non-attainment is a cumulative deterioration the prognoza never quantifies.

Carbon. See Chapter 4.5. The prognoza is **totally silent on CO₂ / GHG / climate-change mitigation** — the word "CO₂" does not appear. For a continuous load of 500 MW–1 GW on the Polish grid (~600–700 gCO₂/kWh), this means a Scope-2 footprint of **~2.6–6.1 Mt CO₂/yr** [COMPUTED - UNVERIFIED pending CF disclosure] — entirely absent from the gmina's environmental record.

Biodiversity, land-take, cultural heritage. The prognoza reports "no legally protected nature forms" on-site, vegetation as transitional segetal/ruderal, fauna as "agrofauna + awifauna tied to farm buildings" — **no species inventories, no field surveys, no BirdLife/IBA cross-check, no nearest-Natura-2000 distance analysis, no ornithological or chiropterological survey** [A · §8]. The site borders State Forest lands and open agricultural fields — typical foraging/flight area for bats and raptors; the conclusion "no significant impact on biodiversity" is asserted without an empirical baseline. The MPZP allows **up to 80% building footprint** (§28(3)(f)) and **30 m maximum building height** (§28(3)(g)) on previously open farmland — a major viewshed change visible for several km in flat Wysoczyzna Belchatowska terrain. The prognoza acknowledges the change is "*zauważalna*" (noticeable) but prescribes no landscape berm, screening, green-roof, or colour requirement [A · §11.11.H]. **Cultural heritage:** the site contains **stanowisko archeologiczne AZP 75-50/26 + strefa ochrony archeologicznej**; earth-works require *badania archeologiczne / nadzór archeologiczny* [A · §10/§12]. This is the only domain where the prognoza is adequate by Polish SEA standards.

E-waste, UPS batteries, PFAS. Hyperscale AI DCs generate a major e-waste stream from 3–5-year server refresh cycles (WEEE Directive applies), UPS lithium-ion battery waste (EU Battery Regulation 2023/1542), and PFAS in two-phase immersion cooling / fire-suppression agents (subject to emerging EU REACH restriction) [A · EU BATTERY REG 2023/1542]. **The prognoza is silent on all three.** It analyses waste at generic-industrial level and explicitly bans incinerators, waste storage, recycling and biogas plants on-site (MPZP §28(3)(j)) — which is fine as a use-prohibition but does not address the DC's own waste stream.

Heat-island. The prognoza frames heat impact as ordinary urbanization-scale (*"lokalne zwiększenie temperatury powierzchni utwardzonych"*) [A · §11.11.I]. The Frontiers 2026 evidence is that continuous-heat-rejection DCs produce **localized warming measurable at ~1–2 K over the DC boundary** (a temperature difference of ~1–2 K; 1 K = 1 °C) ²⁴ Frontiers. A 500 MW–1 GW AI DC rejects ~500 MW–1 GW of waste heat continuously — orders of magnitude beyond what the prognoza's "urbanization" framing implies. **The waste-heat recovery obligation under EU EED Art. 26(6) (see Ch 6.4) is not mentioned anywhere in the prognoza.**

5.3 What a credible environmental assessment for THIS site should contain

At minimum: (a) a **measured dB baseline** at the site boundary and at the nearest residential receptor, plus distance-to-residence mapping; (b) a **volumetric water-demand estimate** (m³/day) and a hydro-geological model that includes KWB Bełchatów's regional drawdown cone; (c) **standby-generator count, capacity, fuel and test-cycle hours**, with NOx/PM emission modelling against the klasa-C PM10 baseline; (d) **EMF modelling** at the property line from on-site 110/220/400 kV substations; (e) **operational CO₂ inventory** (Scope 1 + Scope 2 location-based), against an explicit grid-intensity figure; (f) a **waste-heat recovery feasibility study** tied to Bełchatów town's existing district-heating footprint, per EU EED Art. 26(6); (g) **e-waste, UPS-battery and PFAS waste-stream management plans**; (h) **cumulative-impact analysis** including Elektrownia Bełchatów + KWB Bełchatów mine + DK74 traffic; (i) **ornithological/chiropterological field survey** and nearest-Natura-2000 flyway/foraging assessment; (j) **funded site-specific monitoring** (air, water, noise, EMF) — not deferral to voivodeship-level stations tens of km away.

Chapter 6 — Legal & regulatory framework + your recourse

6.1 The MPZP consultation — live now, closes 28 August 2026

The MPZP for the Domiechowice economic zone is in **live public consultation from 31 July to 28 August 2026** — formal written comments (*uwagi*) must reach the Urząd Gminy by 28 August ³ BIP Bełchatów. Legal basis: **art. 8i ust. 1 pkt 1 in connection with art. 17 pkt 11 and 13** of the ustawa z 27 marca 2003 r. o planowaniu i zagospodarowaniu przestrzennym (Dz.U. 2026 poz. 538). The prognoza is required under **art. 46 ust. 1 pkt 1 / art. 47 ust. 1 in connection with art. 54 ust. 2–3** of the ustawa z 3 października 2008 r. o udostępnianiu informacji o środowisku... (Dz.U. 2026 poz. 670). Authorising resolution: **Uchwała nr XXI/169/2025 Rady Gminy Bełchatów z 25 września 2025 r.** [A · OBWIESZCZENIE, BIP].

Critical timing insight. The prognoza repeatedly frames itself as "*strategiczny*" (strategic) and defers all quantitative impact analysis to the future environmental decision (*decyzja o środowiskowych uwarunkowaniach*, DŚU). This is the standard Polish formula and is formally legal — but it means **the MPZP consultation (closed 28 August 2026) was the highest-leverage public moment** at which binding site-specific conditions could be written into the plan. **It is not the only one** — the later DŚU (as a rule issued by the **Wójt**, with RDOŚ's binding agreement; §6.3) also has a mandatory public-participation stage (art. 79 ust. 1 uioś, Dz.U. 2026 poz. 670: notice in press + on BIP, minimum 21-day window for objections — art. 33, public hearing on request), and conditions can be imposed there as well. But the DŚU's scope is narrower (environmental impact, not land-use conditions), and the bar for resident input is higher. **The highest-leverage window closed on 28 August; a second bite exists at the DŚU.**

On the 30% one-time value-uplift fee. If the adoption or amendment of an MPZP raises the value of a property and its owner or perpetual usufructuary **sells it within 5 years of the plan becoming binding**, art. 36 ust. 4 in connection with art. 37 ust. 3–4 of the planning act (Dz.U. 2026 poz. 538) imposes on the **seller** a one-time fee **set in that plan — up to 30% of the value uplift** ²⁹ ustawa o planowaniu i zagospodarowaniu przestrzennym. The fee is the gmina's own income — a gmina-revenue lever, not a resident-recourse lever — but it explains part of the gmina's financial interest in adopting the plan.

6.2 Noise regulation — done right

The framework is in Chapter 5.2. Operationally: the prognoza's "no housing in immediate neighbourhood" argument is the linchpin of its noise conclusion, but it is **asserted, not demonstrated**. Because we live in Domiechowice, our homes are themselves the class-2a receivers (single-family housing / residential-agricultural), so the binding ceiling at our plot boundaries is **LAeqD 50 / LAeqN 40 dB industrial** (Dz.U. 2014 poz. 112). The 40 dB night ceiling coincides with the WHO 2009 NNG health target. The MPZP writes in no dB cap of its own.

Enforcement path: WIOŚ Łódź (Wojewódzki Inspektorat Ochrony Środowiska) conducts periodic noise measurements every 2 years for installations holding a noise-level decision or integrated permit, per §8 of the Rozporządzenie Ministra Klimatu i Środowiska z 7 września 2021 r. w sprawie wymagań w zakresie prowadzenia pomiarów wielkości emisji (Dz.U. 2021 poz. 242) ³³. Resident noise complaints go to **WIOŚ**

Łódź (delegatura Bełchatów) or **RDOŚ Łódź**; evidentiary bar normally requires an accredited acoustic-laboratory measurement per PN-ISO 9613-2. Civil recourse: **art. 144 Kodeksu cywilnego** (immissions) — a property owner may demand cessation + damages if noise/vibration/dust exceeds the "*miara przeciętna*" (average standard) of the locality²⁹ Kodeks cywilny art. 144.

6.3 EIA / DŚU framework — qualifying thresholds, competent authority and investor obligations

The relevant screening regulation is the **Rozporządzenie Rady Ministrów z 10 września 2019 r. w sprawie przedsięwzięć mogących znacząco oddziaływać na środowisko**, Dz.U. 2019 poz. 1839³². The decisive item for a hyperscale DC: **§3 ust. 1 pkt 54** — "zabudowa przemysłowa [...] lub magazynowa [...] o powierzchni zabudowy nie mniejszej niż [...] b) 1 ha na obszarach innych" — i.e. **1 ha building footprint triggers screening outside nature-protection zones**. The Bełchatów site is ~40–50 ha with no Natura 2000 on-site; multi-hall DC $\gg$ 1 ha $\rightarrow$ **screening required** [A · Dz.U. 2019 poz. 1839, §3 ust. 1 pkt 54]. Full-text verification of the regulation (August 2026) further confirms it **contains no separate entry for data centres** — qualification therefore follows automatically from the project's physical parameters, not from administrative discretion.

Qualification "with installations" — several thresholds at once. The formula used in project communications about a "predicted environmental qualification of the undertaking with its installations" should be read literally: the installations admitted by §11(2–3) of the uchwala **each independently exhaust separate thresholds of the regulation**. **Item 4** — fuel-combustion installations for electricity generation with **thermal input ≥ 25 MW** (solid fuel: ≥ 10 MW): at 500 MW IT the standby generator fleet runs to hundreds of MVA, and a single hall's group of the largest gensets already exceeds 25 MW thermal input — **the standby installation alone qualifies the undertaking, even if building footprint dropped below 1 ha**. **Item 73** — groundwater abstraction ≥ 10 m³/h; **item 74** — already ≥ 1 m³/h from the same aquifer if other such intakes operate within 500 m (a live issue for the §20 interim wells vs Domiechowice household wells; item 74 excludes ordinary household use — domestic wells within ordinary use may not qualify, so their classification remains to be confirmed). **Item 80** — industrial wastewater treatment installations with **no threshold at all**; **item 79** — treatment plants ≥ 400 PE; **item 81** — sewer networks ≥ 1 km; **item 71** — trunk water pipelines; **item 62** — hard-surface roads > 1 km (the internal layout of a campus at this scale); **item 7** — overhead power lines ≥ 110 kV (cable lines are not listed).

Anti-salami-slicing clauses (§3 ust. 2 pkt 2–3). Successive extensions aggregate with earlier ones unless covered by prior DŚUs, and sub-threshold undertakings of the same kind on the territory of one plant aggregate towards the thresholds. **Phasing 500 MW $\rightarrow$ ~1 GW therefore cannot evade screening** — each "smaller" phase adds its parameters to the previous ones and reaches the thresholds during construction.

Competent authority — as a rule the Wójt, not RDOŚ (art. 75 uioś). The RDOŚ catalogue (art. 75 ust. 1 pkt 1 uioś, Dz.U. 2026 poz. 670) covers roads, overhead power lines, pipelines, nuclear facilities, wind farms and special investments — **a data centre does not appear in it**, so the DŚU is issued by the **Wójt of Gmina Bełchatów** (item 4, residual category). This changes under **art. 75 ust. 1a**: if a single application covers at least two undertakings with different competent authorities, including one *always-significant* (e.g. a new overhead line ≥ 220 kV and ≥ 15 km — §2 pkt 6 of the regulation), **RDOŚ Łódź takes over the whole application**. Even with the Wójt, RDOŚ issues **binding conditions-of-implementation agreements** (art. 77 ust. 1 pkt 1 and ust. 4 and 10), the water-law authority agrees

(item 4), and PPIS Bełchatów issues an opinion (item 2; art. 78 ust. 1 pkt 2). Note the governance structure this creates: **the authority running the MPZP consultation, the co-author of the "Myths" series with the investor, and — as a rule — the future DŚU authority would be the same Wójt**; independent control over the project is provided by the RDOŚ agreements and the PPIS opinion. Procedural steps are unchanged: EIA report (mandatory for *always*-significant undertakings such as this one; for potentially-significant ones — after the optional information-card procedure of art. 70 uioś), agreements and opinions, **public participation** — press + BIP notice, minimum 21-day window for objections (art. 79 ust. 1 and art. 33), decision with binding conditions. Factual status of this proceeding (August 2026): the DŚU application was filed on 22.12.2025 (received 23.12.2025; file ref ZŚ.6220.23.2025; commencement notice 05.01.2026), the undertaking was classified as capable of **always significantly** affecting the environment, the full scope of the OOS report was set by the Wójt's *postanowienie* of 14.05.2026, and on 27.05.2026 the Wójt suspended the proceeding pending submission of the OOS report ¹⁷² — the public-participation stage will therefore come after the report is submitted and the proceeding resumes, in the sequence described above.

"Obligations imposed on the investor" (art. 82 uioś). A DŚU issued after a full assessment contains: material conditions of environmental use in the construction and operation phases; duties to avoid, prevent and mitigate impacts; **environmental-impact monitoring** with results reported to designated authorities; optionally a **post-completion analysis** (mandatory where a limited-use area is created). The decision is published on BIP for 14 days (art. 85 ust. 3), and the DŚU **binds** the building-permit and water-permit authorities (art. 86). These are exactly the "investor obligations" referenced in the communications — their content remains unknown until the undertaking's information card becomes publicly available; no such application appears in the BIP package published for consultation. The filing itself (application of 22.12.2025, file ref ZŚ.6220.23.2025) was disclosed by the Urząd Gminy (UG) inter-session information for 10.06–10.08.2026 ¹⁷² — but the undertaking's information card is still not publicly available. Three questions working this ground: Theme 9 (Q39–Q41) in «Belchatow_Questions_EN».

Civic roles. Any resident can be appointed by WIOŚ as a **społeczny inspektor ochrony środowiska (SIOŚ)** — a voluntary civic post with statutory rights to inspect installations, request measurement data, and intervene (Prawo ochrony środowiska art. 119–122, Dz.U. 2025 poz. 647).

Appeal path. First instance: from a DŚU issued by the **Wójt**, appeal goes to the **Samorządowe Kolegium Odwoławcze (SKO)**; from a DŚU issued by **RDOŚ**, to the **Generalny Dyrektor Ochrony Środowiska (GDOŚ)** in Warsaw — 14 days in both cases. Second-instance: *skarga do Wojewódzkiego Sądu Administracyjnego (WSA) w Łodzi* within 30 days; further to Naczelny Sąd Administracyjny (NSA). Poland is party to the **Aarhus Convention (1998)**; residents have standing on environmental matters ³⁹ UNECE Aarhus Convention.

6.4 EU Energy Efficiency Directive — reporting and waste-heat reuse

The recast Energy Efficiency Directive — **Directive (EU) 2023/1791** — places two distinct obligations on the Domiechowice DC ³⁶:

1. **Annual reporting (≥500 kW IT).** Art. 12(1): by **15 May 2024** and every year thereafter, owners and operators of DCs with **power demand of the installed IT ≥ 500 kW** must make the Annex-VII information publicly available via the **European Database on Data Centres**. Reporting template defined by **Commission Delegated Regulation (EU) 2024/1364** (PUE, REF, WUE,

REF-T KPIs)³⁷. **Bełchatów Phase 1 (500 MW) exceeds this threshold by three orders of magnitude.**

2. **Waste-heat recovery (>1 MW total rated energy input) — mandatory, in Art. 26(6)** (*corrected from a common mis-citation to Art. 12*). Verbatim: "Member States shall ensure that data centres with a total rated energy input exceeding 1 MW utilise the waste heat or other waste heat recovery applications unless they can show that it is not technically or economically feasible in accordance with the assessment referred to in paragraph 7." The escape clause requires a documented cost-benefit analysis (Art. 26(7) + Annex XI)³⁶. **A 1 GW DC clearly exceeds this threshold by three orders of magnitude.** Bełchatów town has an existing PGE district-heating footprint; waste-heat reuse is technically and economically plausible and is **mandated, not optional**, absent a documented infeasibility showing. The prognoza does not mention this obligation.

6.5 Property tax — TK SK 14/21 and the 1 Jan 2025 amendment

Polish real-property tax is governed by the **ustawa o podatkach i opłatach lokalnych** (t.j. Dz.U. 2025 poz. 707)³⁴.

The direct legal trigger for the 2024–25 reform was **Wyrok Trybunału Konstytucyjnego (Constitutional Tribunal judgment) z 4 lipca 2023 r., SK 14/21**, which declared the prior statutory definition of "struktura" (structure) **unconstitutional** for vagueness⁶¹ Dudkowiak legal analysis;⁶³ Cushman & Wakefield.

The **amendment was signed 27 November 2024 by the President of RP**, in force **1 January 2025**⁶⁶ getsix. Net effect for DCs: definitions of "budynek" and "struktura" are now self-contained in the act; server racks, cable trays and cooling piping integrated into a building are taxed as part of the building (per m²) rather than as separate structures. PV panels, fuel tanks and antennae are listed in the annex as structures. **DC tax burden reduced, but residual interpretation volatility persists** — PwC/Dudkowiak flag further NSA U-turns as plausible⁶⁴ PwC Poland.

6.6 FDI screening — does the investor trigger it?

The Polish foreign-investment screening statute is the **ustawa z 24 lipca 2015 r. o kontroli niektórych inwestycji**, t.j. **Dz.U. 2026 poz. 47**; the latest major amendment (ustawa z 9 lipca 2025 r., Dz.U. 2025 poz. 973) effective **24 July 2025** made the regime **permanent**³⁵; ⁶⁷ White & Case.

Notification triggers (Art. 3): control (≥50%); significant participation at **20%, 25%, 33%** discrete thresholds. Strategic sectors (Art. 4 ust. 1) — 14 named, including electricity generation, fuel production/storage, chemicals, gas/electricity distribution, **telecommunications activity (pkt 11)**, mining for military metals. **Data centres are NOT directly listed**. Post-24-July-2025, the regime is permanent for **investors from outside the EEA and OECD**⁶⁸ A&O Shearman.

Applied to the Domiechowice investor:

- **EXUS DIGITAL LDA (Portugal) — EU/EEA + OECD → outside the regime's primary geographic scope.**
- **NEXT DC Sp. z o.o. / Rhett Weiss (US national on the DC Bełchatów board) — US is OECD and an EEA-friend → also outside primary scope.** **[UNVERIFIED]** whether non-OECD/EEA ultimate beneficial owners exist further up the chain; this would need a KRS UBO disclosure to rule out.

- **Telecom angle:** if the DC operator also holds a telecommunications concession (Art. 4 ust. 1 pkt 11), FDI scope could attach even for EU investors.

Bottom line: absent (a) non-OECD/EEA UBOs, or (b) the DC entity being added to the *wykaz*, the current investor structure **most likely does NOT trigger a mandatory FDI notification** — [UNVERIFIED] without UBO analysis.

6.7 Your recourse ladder — numbered, actionable

Who to engage (do not funnel everything through the Wójt alone). The Wójt prepares the plan and issues *rozpatrzenie uwag*, but the Wójt is the executive — the **Rada Gminy Bełchatów** (gmina council) is the legislative body that **votes to adopt the MPZP by uchwała**, so individual **radni** (council members), especially those elected from the Domiechowice district, are the actual decision-makers on adoption. Engage them before the vote. The full advocacy map for this MPZP:

- **Gmina Bełchatów (rural — the deciding municipality):**
- **Wójt Dr Konrad Koc** + the Urząd Gminy (file *uwagi*, take part in the consultation).
- **Rada Gminy Bełchatów** + radni from the Domiechowice area (lobby before the adoption vote — likely Oct/Nov 2026; ask them to condition their vote on binding conditions in the plan).
- **Sołtys Domiechowice** (village head) + Domiechowice residents' assembly — your closest elected official and natural ally; coordinate with other residents.
- **Regional regulatory bodies (each runs a separate track you can intervene in):**
- **Wójt of Gmina Bełchatów** — the DŚU authority as a rule (art. 75 ust. 1 pkt 4 uioś; public-participation stage).
- **RDOŚ Łódź** — issues the binding conditions-of-implementation agreement in every DŚU (art. 77 ust. 1 pkt 1), and becomes the DŚU authority if the application bundles an always-significant undertaking, e.g. an overhead line ≥ 220 kV / ≥ 15 km (art. 75 ust. 1 and 1a uioś).
- **WIOŚ Łódź** (delegatura Bełchatów) — noise / air / water enforcement, periodic measurements.
- **PPIS Bełchatów** (sanitary inspector) — scoping opinion already on file (letter ZNS.90280.1718.2025).
- **Wody Polskie (PGW WP)** — the **water-abstraction permit authority**: the *pozwolenie wodno-prawne* on the actual volumetric water cap is issued by Wody Polskie, not by the gmina or RDOŚ. The MPZP §20 can set a policy cap, but the binding number will be set at the DŚU / building-permit / water-permit stage. You can request to be a **party (strona)** to the water-permit proceeding.
- **Miasto Bełchatów (the town — affected neighbour, separate municipality):**
- **Prezydent Miasta Bełchatowa + Rada Miasta** — the town is not the deciding authority for this MPZP, but it is an **affected neighbour by proximity** (the site is close to the town; waste-heat reuse would serve the town's PGE district-heating network). The town's planning office can be asked to submit its own observations to the Gmina Bełchatów consultation, which carries political weight.

Use these in sequence; each step has its own deadline and evidentiary bar. **Highest leverage is at steps 1–3 right now.**

1. **[NOW – 28 Aug 2026] File formal *uwagi* to the MPZP** to Wójt Gminy Bełchatów, Dr Konrad Koc (template in §9.2.1). Legal basis: art. 8i ust. 1 pkt 1 in connection with art. 17 pkt 11 and 13 u.p.z.p. (Dz.U. 2026 poz. 538). The Wójt must consider all *uwagi* and issue a written *rozpatrzenie* (~18 Sep 2026); under **art. 8l u.p.z.p. the *rozpatrzenie uwag* is not itself appealable** — the challengeable act is the adopted MPZP itself (see step 4) [A · BIP *OBWIESZCZENIE*; ART. 8l U.P.Z.P.].
2. **[Parallel] FOI the RDOŚ + PPIS letters.** The prognoza §11.17 references two specific letters — **RDOŚ Łódź letter WOOŚ.411.636.2025.AJa.2 of 29 Dec 2025** and **PPIS Bełchatów letter ZNS.90280.1718.2025 of 7 Jan 2026** — but does **not reproduce them in full** in the BIP package [A · §11.17]. Use the FOI template (§9.2.2); statutory reply deadline **14 days** (extendable to 2 months).
3. **[In the consultation — in writing, to 28 August] Demand answers to the accountability questions** in the separate Questions sheet («Belchatow_Questions_EN.pdf»): noise dB at the property line; waste-heat offtake partner; volumetric water-draw cap; PUE/WUE targets; diesel-genset test hours; EMF at the boundary; 110 kV transmission-line routing (GPZ Kurnos confirmation); property-tax revenue projection; FDI / UBO disclosure.
4. **[After MPZP adoption] Challenge the MPZP in WSA.** A Rada Gminy uchwała is challengeable via **skarga do Wojewódzkiego Sądu Administracyjnego w Łodzi** within 30 days of publication. Standing: under **art. 101 ust. 1 u.s.g.** (ustawa o samorządzie gminnym) in conjunction with PPSA art. 3 §2 pkt 5, anyone whose **legal interest in their property** is affected by the planning act may bring a *skarga*; the post-2023 reform requires the plaintiff to demonstrate a violation of that legal interest (consult a lawyer on standing in your specific case) [A · U.S.G. ART. 101; PPSA ART. 3 §2 PKT 5]. **Timeline expectation:** WSA proceedings typically take **6–18 months**, with NSA appeal on top; resolution in **months-to-years**, not days. File your *uwagi* anyway — they create the paper trail and demonstrate exhausted administrative remedies before going to court.
5. **[DŚU stage — decision expected 2027–2028, after resumption of the suspended proceeding] Intervene as a *strona postępowania* (party).** The DŚU proceeding is already open (application of 22.12.2025, file ref ZŚ.6220.23.2025) and suspended pending submission of the raport OOŚ¹⁷² — it is run, as a rule, by the Wójt (§6.3). Once the report is submitted and the proceeding resumes, submit observations on the raport OOŚ, request participation in the public hearing, and propose binding conditions — waste-heat reuse to Bełchatów town DH; noise cap at property line at class-2a level; EMF monitoring. **EED Art. 26(6) + Annex XI gives concrete waste-heat language to demand.**
6. **[Continuous, once DC operates] WIOŚ noise/vibration/EMF complaints** — to WIOŚ Łódź (delegatura Bełchatów); support with accredited-laboratory measurements; escalate to RDOŚ for a *decyzja o dopuszczalnym poziomie hałasu* if standards are exceeded.
7. **[Civil track] Art. 144 KC immisions suit** — if property enjoyment is impaired beyond the "*miara przeciętna*", sue for injunction + damages in Sąd Rejonowy Bełchatów; standard of proof is lower than administrative.
8. **[EU track] EC complaint** — for breach of EED (Art. 12 reporting + Art. 26(6) waste-heat), END (noise mapping around the DC), or Aarhus Convention.
9. **[Aarhus track] Communication to the Aarhus Convention Compliance Committee** — Geneva; admissible for breach of access-to-information, participation, or access-to-justice rights on environmental matters; non-binding but reputationally potent for Poland.

10. **[Political track] RPO + MS + Sejm** — petition the Rzecznik Praw Obywatelskich, the Ministerstwo Cyfryzacji, and the Sejm infrastructure commission.

6.8 The next battlefield: the building permit and the *warunki techniczne* (WT) — hard numbers you can enforce

Everything in §6.1–§6.7 concerns the planning and environmental stages. The next mandatory gate is the **building permit** (*pozwolenie na budowę*), governed by a regulation made almost entirely of hard, checkable numbers: the **WT 2002** — Rozporządzenie Ministra Infrastruktury z 12 kwietnia 2002 r. w sprawie warunków technicznych, jakim powinny odpowiadać budynki i ich usytuowanie, consolidated text Dz.U. 2022 poz. 1225 ¹²⁰. Three properties make this stage qualitatively different from the MPZP stage:

- **Neighbours are parties (*strony*)**. Owners of plots in the *obszar oddziaływania obiektu* (area of a building's impact, art. 3 pkt 20 Prawa budowlane) participate in the permit proceeding and can inspect the whole project file at the gmina.
- **Non-compliance is a mandatory refusal ground**. A design that violates the WT cannot be permitted (art. 37 ust. 1 Prawa budowlane) — and a permit decision is appealable, unlike the *rozpatrzenie uwag* of §6.7 step 1.
- **Anyone can police it later**. During construction and use, WT violations can be reported to **PINB** (Powiatowy Inspektor Nadzoru Budowlanego) under art. 81–84 Prawa budowlane.

A caution on currency. This section cites the 2022 consolidated text; the WT has been amended since 2022. Paragraph numbering is believed stable, but exact values must be re-verified against the current consolidated text before any formal use. [A · WITH CURRENCY CAVEAT]

What the campus is, in WT terms. Under § 209 ust. 3 WT, the fire-safety requirements for **PM** buildings (produkcyjne/magazynowe — production/warehouse) apply explicitly to *rozdzielnie elektryczne* (switchgear), **stacje transformatorowe** (transformer stations), *kotłownie* (boiler plants), and similar — i.e. most of the campus. Data halls with diesel-generator halls and fuel stores are PM fire zones; support offices with >50 non-permanent occupants would be ZL I. Halls at the MPZP's 30 m height limit (§28(3) (g)) are "wysokie (W)" buildings (>25 m).

The computable fire setbacks (§ 271–272 WT) — the buffer the MPZP never gave you. § 271 sets minimum distances between building walls by the fire-load density (*gęstość obciążenia ogniowego*, Q) of the PM fire zone: 8 m ($Q \leq 1000$ MJ/m²), 15 m ($1000 < Q \leq 4000$), 20 m ($Q > 4000$), with a +50 % increase where a wall or roof covering of one of the pair spreads fire and +100 % where it affects both buildings (§ 271 ust. 2) and –50 %/–25 % reductions where fixed water extinguishing systems protect all adjoining fire zones (ust. 6–7). Two applications matter here:

- **To the forest line (§ 271 ust. 8)**. The distance from ZL/PM/IN buildings to the contour of forest — understood as *grunt leśny* L_s on the cadastral map **or land designated as forest in the MPZP** — equals the distance to a ZL building with a fire-spreading roof. That fictional "neighbour" already contributes one fire-spreading element, so for a hall of non-fire-spreading elements the setback is **12 m** ($Q \leq 1000$), **22.5 m** (Q 1000–4000) or **30 m** ($Q > 4000$); where the hall's own roof covering or forest-facing wall also spreads fire (both buildings of the pair) — **16/30/40 m**. On this site — which borders **State Forest land** (§2.1) — the halls must therefore stand at least 12–40 m from the existing forest, depending on class. The narrower exception (§ 271 ust. 8a, only for buildings listed in § 213,

made of non-fire-spreading elements, without explosion-risk rooms, and with a fire-resistance class higher than § 212 requires): **4 m** from forest on a neighbouring parcel, and from forest on the same parcel **no distance is specified at all**; it requires the MPZP to designate the area for non-forestry development.

- **To unbuilt neighbouring plots (§ 272 ust. 1).** At least **half** the § 271 distance, with the neighbour's future building presumed per the MPZP and PM fire load presumed in the 1000–4000 MJ/m² band — i.e. a practical **minimum 7.5–10 m** from the boundary, replacing the generic 3/4 m of § 12 WT.

The citizen demand that falls out: the permit design must **declare Q for every PM fire zone** and show the resulting setbacks from plot boundaries and the forest contour — numbers anyone can check on the site plan.

Noise and vibration (§ 96, § 180 ust. 3 pkt 3 WT). Technical rooms housing noise/vibration-emitting equipment (generator halls, chillers) require structural-material protection per Polish Norms for permissible sound levels, and mountings that prevent transfer into the structure (§ 96 ust. 2). § 180 ust. 3 pkt 3 requires electrical installations to protect against noise and vibration above permissible levels **and harmful electromagnetic-field effects** — the WT's only EMF hook. Boundary with §6.2: the WT governs construction-level protection; the environmental immission limits (day/night at the property line) remain a DŚU-stage lever.

Fuel and gas siting (§ 137, § 273, § 179 WT). In-building heating-oil storage: atmospheric tanks only, battery total $\leq 100 \text{ m}^3$ per *magazyn*, an oil-tight *wanna wychwytyjąca* holding one tank's volume, 2–4 air changes/h ventilation plus a window or semi-fixed foam device (§ 137). Above-ground boiler-fuel tanks $\geq 10 \text{ m}$ from ZL buildings (3 m only behind an R E I 120 fire wall; double-walled tanks or an oil-tight basin) (§ 273 ust. 2–4); underground tank devices $\geq 10 \text{ m}$ (§ 273 ust. 5). LPG tank groups: ≤ 6 tanks / $\leq 100 \text{ m}^3$ per group; **not in terrain hollows or wet ground, $\geq 5 \text{ m}$ from ditches, man-holes and drains** (§ 179 ust. 3 — relevant next to the forest drainage); $\geq 15 \text{ m}$ from overhead lines $\geq 1 \text{ kV}$ (§ 179 ust. 9). Note: bulk generator-diesel farms may exceed the heating-oil chapter and fall under separate fire-protection/Seveso rules (§6.3 cross-ref; Questions sheet Q18) — forcing that classification question is itself a demand.

Stormwater for ~40 sealed hectares (§ 28–29 WT). A building plot must drain stormwater to a public storm sewer; where none exists (the situation in rural Domiechowice), discharge must go to the investor's own unsealed ground, soakaways, or **retention tanks** (§ 28 ust. 2). § 29 **prohibits** altering natural runoff so as to direct it onto a neighbouring property — the farm fields are the receiving ground today. With the MPZP permitting up to 80 % footprint (§28(3)(f)) on ~50 ha, the retention balance for ~40 ha of new sealed surface is a checkable design quantity (cross-ref §5.2).

Power infrastructure inside the fence (§ 181, § 182, § 53 ust. 2 WT). Buildings whose loss of supply threatens life, health, the environment or **major material losses** must be fed from **at least two independent, auto-switching sources** (§ 181 ust. 1) — the legal engine of the entire diesel-generator fleet and its fuel demand. Transformer-station rooms inside other buildings require § 96 protection plus $\geq 2.8 \text{ m}$ distance from permanent human occupancy and sealed fire separations (§ 182). Lightning protection per PN-EN 62305 is mandatory where the Norm requires it (§ 53 ust. 2) — for 30 m halls, a checkable design element.

Access roads (§ 14–15 WT). Minimum carriageway 3 m, lit after dusk (§ 14); width, radii and load capacity must match the heaviest vehicles the use requires (§ 15) — demand they be dimensioned for abnormal transformer and generator transports, not passenger cars.

Six ready-to-paste demands for the permit stage (Polish):

1. Deklaracja gęstości obciążenia ogniowego (Q) każdej strefy pożarowej PM oraz wynikające z § 271–272 WT odległości budynków od granic działek sąsiednich i konturu lasu.
2. Dokumentacja akustyczna pomieszczeń technicznych (§ 96 WT) oraz deklaracja poziomów mocy akustycznej źródeł (agregaty, chłodnie, transformatory) na granicy działki — do weryfikacji z dopuszczalnymi poziomami hałasu w środowisku.
3. Zestawienie zbiorników paliwa i gazu z pojemnościami, konstrukcją i odległościami wymaganymi § 137, § 273 i § 179 WT — wraz z klasyfikacją wg przepisów o ochronie przeciwpożarowej / Seveso.
4. Bilans retencji wód opadowych dla ~40 ha powierzchni uszczelnionej (§ 28 ust. 2 WT) oraz potwierdzenie zakazu zmiany naturalnego spływu wód na działki sąsiednie (§ 29 WT).
5. Wskazanie dwóch niezależnych, samoczynnie załączających się źródeł zasilania (§ 181 ust. 1 WT) oraz lokalizacji stacji transformatorowych z warunkami § 182 WT.
6. Parametry dróg dojazdowych (szerokość, nośność, promienie — § 14–15 WT) zwymiarowane dla transportów nadnormatywnych (transformatory, agregaty).

Chapter 7 — Advantages and the hard questions

A serious regional project has to clear two bars at once: it has to *do what it promises* (jobs, taxes, transition), and it has to *not do what it denies* (noise, water stress, carbon lock-in). This chapter walks through each claimed benefit, checks it against independent evidence, and ends with the hard questions a serious investor would welcome.

7.1 Employment: the gap between "thousands" and "dozens"

The official line, carried by the wójt and local press, is that the Domiechowice campus will employ "**several thousand people**" (*kilka tysięcy ludzi*) at the construction peak ¹⁰² ebelchatow.pl. The permanent-operations headcount remained unpublished until the August 2026 "Myth #8" post gave "approx. 250 permanent jobs" — still without any official document (analysis of the figure and its gaps: §2.4.15) ¹⁷⁹

[A · BIP, FULL-TEXT CHECK].

That omission matters, because the independent evidence on hyperscale jobs is unambiguous:

- Across US hyperscale campuses, the **permanent operational workforce is typically 50–200 people per site**, not thousands. Construction peaks of 1 000–2 000 last ~18–36 months and are largely specialist subcontractors who do not stay ⁴⁹ Brookings (Bahar & Wright); ⁷⁰ Good Jobs First.
- Brookings further finds hyperscale campuses yield **~100–200 net new jobs at the county level**; many indirect roles (legal, IT services, finance) cluster in **major cities**, not at the rural site ⁴⁹ Brookings (Bahar & Wright).
- After construction, "server farms become highly automated, employing only a dozen to a few dozen people" — the critique levelled at the Bełchatów project by **Marta A. Seweryn of Fundacja Carbon Footprint (CFF)**, who explicitly calls the "thousands of jobs" promise a recurring overstatement ¹⁰¹ ŚwiatOZE.pl quoting CFF.

Plain-language takeaway: the "thousands of jobs" the project will create are real, but they are mostly temporary construction workers housed in the region for a couple of years. The site itself, once built, will probably look more like a small industrial facility than a major employer. If permanent local employment is the community's main reason to accept the project, that number should be written into the investment agreement or a host-community agreement — with penalties and reporting — not left for social-media communications (the MPZP cannot bind the investor on employment; Q75).

Who really works at a campus — roles, origins, legal mechanics. The "whose hands" question of §2.4.15 decomposes into documented layers. **Operations:** the staffing core is server/network technicians and critical-environment technicians (electrical, HVAC) — in the hyperscale model a high-school diploma plus employer training suffices, and operations roles are expressly **not visa-sponsored** and are recruited locally (Datacenter Academy-type programmes, including in Polish) ¹⁸⁹; security, cleaning and catering are usually local subcontractors. No documented case of "Indian/Korean operational crews" exists at European or American hyperscale campuses — the recruitment model (low entry bar, in-house training, no visa sponsorship) structurally does not require it; South Koreans in Polish industry follow a different pattern — an initial know-how transfer with the daily work done by Polish staff (LG Energy Solution

and of construction workers (11% of all working foreigners; 67.7% of them Ukrainian citizens, with Colombia, Nepal and the Philippines the fastest-growing groups) ¹⁸⁸ — multinational construction sites are a statistical norm in Poland, with the same Labour Code and minimum wage for every worker regardless of citizenship. **Local fit:** the Bełchatów powiat has 2.4 thousand registered unemployed (rate 5.2%), but their structure (about one-third without qualifications, ~30% long-term unemployed) is not a ready-made pool of DC technicians; local vocational schooling trains electricians (the PGE-sponsored class at ZS no. 1 in Bełchatów) but has **no refrigeration/HVAC track — the trade most critical for data centers** [A · PUP/ZS; UNVERIFIED – FULL OFFER]. The entry bar is low: actual Polish operator job postings for a data-center technician require secondary education, with SEP certification "welcome", not required ¹⁸⁹. **The legal mechanics of hiring foreigners** involve no quotas and no local-hire requirements: the employer applies for a work permit (with a labour-market test) or — for citizens of Armenia, Belarus, Moldova and Ukraine — a declaration without the test; group management enters through the ICT permit, degree holders through the EU Blue Card (2026 threshold 13,355.34 PLN/month) [A · ALIENS ACT]. No provision imposes a local-employment minimum on a private investor — only voluntarily accepted public aid can condition one. **What public data cannot tell:** the nationality mix of the future crews (construction or operations), the percentage share of local hires (no operator anywhere publishes it), or DC-technician pay in Poland — those dimensions remain questions for the investor (Q70, Q72), not preordained outcomes.



Figure 4. Hyperscale-DC employment: the claimed "thousands" vs the 50–200/site reality.

7.2 Tax revenue: the "2.5–3× Elektrownia" claim, reality-checked

The wójt has stated publicly that the campus will yield **property-tax revenue** (*podatek od nieruchomości*) equivalent to "2.5 to 3 times" what Elektrownia Bełchatów currently pays ("takie dwie i pół do trzech elektrowni") ¹⁰² ebelchatow.pl. That figure is [UNVERIFIED] — the wójt has not published the calculation behind it.

What the independent evidence says:

- **Property tax** (*podatek od nieruchomości*) does flow to the gmina, and for large industrial sites it can be a material share of local revenue ⁶² Dudkowiak legal analysis.

- **But the tax base for data centres has been unstable.** The Constitutional Tribunal judgment SK 14/21 (4 July 2023) and the resulting amendment (signed 27 Nov 2024, in force 1 Jan 2025) partially remedied the over-taxation of DCs, but legal commentators (PwC, Dudkowiak, Cushman & Wakefield) flag further NSA U-turns as plausible ⁶¹ Dudkowiak; ⁶⁵ International Tax Review.
- The sector-wide picture is healthier: in 2025 the Polish data-centre sector generated **~10.6 bn PLN of gross value added, ~4.3 bn PLN of fiscal revenue, and ~41 000 jobs nationally** (PwC / Polski Związek Centrów Danych) ⁸⁷ KNews citing PwC/PZCD.

Plain-language takeaway: the gmina probably will get more property-tax revenue than today, but the "2.5–3×" multiplier is a press figure, not a published calculation, and it sits on top of a tax base that has already been re-litigated once in the past three years. The residents' independent estimate (§2.4.16) places the future revenues at approx. PLN 11.3–21.4 million a year at 500 MW (PLN 21–39 million at ~1 GW) — verifying the "2.5–3× the power plant" comparison is Q77.

7.3 Spillovers and the post-coal narrative

The optimistic narrative, voiced by regional officials (Marszałek Joanna Skrzydlewska, Wicemarszałek Piotr Wojtysiak, Starosta Jacek Zatorski), frames the campus as the cornerstone of "**Bełchatów 2.0**" — a post-coal transition that brings the IT sector to the region, reuses existing grid + road infrastructure, and supplies the local labour market with new skills ² Urząd Gminy Bełchatów.

What independent evidence supports: data centres do generate *some* local spillover (facilities, security, on-site technician roles), and the infrastructure-reuse angle is real — Bełchatów has transmission, water, road and rail capacity that a greenfield site in Mazury would lack.

What the evidence warns against: CFF's critique — that "**the local community bears the full environmental cost while profits leave the country**" — is structurally accurate for hyperscale DCs whose parent companies are non-Polish ¹⁰¹ ŚwiatOZE.pl quoting CFF. The KRS-listed shareholders of the project SPV are NEXT DC Sp. z o.o. (Warsaw) and EXUS DIGITAL LDA (Portugal); the gmina separately told Onet that the lead investor is Partners Group Holding AG (Switzerland), an entity not currently visible in the Polish KRS — see Q1 in the separate Questions sheet.

7.4 Subsidies: what public money is on the table

A 1 GW AI campus is well beyond what a private investor finances alone — public capital and tax relief are usually decisive. The relevant Polish and EU instruments:

- **Polska Strefa Inwestycji (PSI / Polish Investment Zone):** a nationwide support instrument offering **CIT/PIT exemption for ~10–15 years (up to 20 years under the 2025 reform)** and regional aid intensity **up to 70 %** of eligible costs in lower-developed voivodeships (Łódzkie qualifies) ⁴¹ PAIH; ⁸⁴ Crowe.
- **Krajowy Plan Odbudowy (KPO / National Recovery Plan):** Poland's **~€60 bn** EU recovery package, including **€1.2 bn for digital infrastructure** and a **PLN 10.8 bn (~€2.5 bn) loan to PSE** (the TSO) for transmission-grid expansion ⁴⁰ European Commission; ⁵¹.
- **BGK (Polish state development bank):** in December 2025 BGK invested **€25 M in the PIMCO European Data Center Opportunity Fund** — a clear signal that Warsaw treats DCs as a strategic national asset class ⁴⁴ BGK.

- **EU AI Factories initiative:** as of the report's date, **19 AI Factories have been selected across the EU**, and **Poland IS among the hosts** — the **Gaia AI Factory** (Cyfronet AGH, Kraków area) was selected in **March 2025**, and a **second Polish AI Factory** was added in **October 2025** ⁴² EuroHPC JU; ⁴³ European Commission. **Important category distinction:** AI Factories fund **public EuroHPC supercomputing infrastructure for AI research** (operated by academic consortia such as Cyfronet AGH), **not private commercial hyperscale data centres**. Poland's participation is a signal of national AI seriousness and a potential future research-user base, but a private 1 GW commercial campus at Domiechowice would **not** automatically receive EuroHPC co-funding — that money flows to the designated AI-Factory nodes. So while the Bełchatów project sits in the same national AI ecosystem, the subsidy instruments actually relevant to a private DC are PSI (CIT exemption), KPO digital-infrastructure line, BGK/PIMCO fund, and the EED waste-heat-reuse obligations as a community leverage point — not AI Factories.

Strings attached (community leverage): EU co-funding through KPO or any future EuroHPC track brings mandatory **EU Energy Efficiency Directive (EED)** obligations: annual reporting for any DC ≥ 500 kW IT load (Art. 12), and a binding **waste-heat recovery obligation for any DC > 1 MW total rated energy input** unless a documented cost-benefit analysis shows infeasibility (Art. 26(6)) ³⁶ Directive (EU) 2023/1791. A 1 GW campus exceeds both thresholds by three orders of magnitude, so these are not optional — and they are exactly the conditions a community can ask to have written into the MPZP and the future DŚU.

7.5 Carbon — what the Polish grid means

A 1 GW AI training load running near-continuously draws ~ 8.76 TWh/yr. On the Polish grid, whose carbon intensity was **662 gCO₂/kWh in 2023** (the highest among the EU's three largest coal-power countries) ²⁶ Ember European Electricity Review 2024, that translates to a computed footprint of **~ 5.3 – 6.1 Mt CO₂/yr** for the full 1 GW campus, or **~ 2.6 – 3.1 Mt CO₂/yr** for the 500 MW Phase 1 alone.

[COMPUTED - UNVERIFIED pending capacity-factor disclosure] These figures assume 100 % capacity factor. AI training workloads approach 100 % CF; typical enterprise DCs run 60–80 %. The operator has not disclosed a target CF. Use these figures in your uwagi and correspondence as illustrative upper bounds, not as hard facts — they are computed from public grid-intensity data, not measured or operator-disclosed. If the operator quotes a lower CF, you cannot argue the point without their data; instead ask them to disclose their projected CF and Scope-2 emissions on the record.

For context: this would add roughly **~ 18 – 23 % on top of Elektrownia Bełchatów's current ~ 27 – 30 Mt CO₂/yr** (PGE GiEK actuals; already the EU's #1 emitter since 2005). The wójt's own Onet statement — that the DC will let the lignite plant "run continuously at 100 % instead of being throttled by renewables" — explicitly endorses the coal-powered counterfactual ¹⁰⁰ Onet. PGE's second large nuclear plant at the Bełchatów site, which the government confirmed preliminary work on in February 2025, is **not realistically available before ~ 2040** ⁵⁶ NucNet.

7.6 The hard questions a serious investor welcomes

These are expanded into a full fifty-one-question list across eleven themes in the separate Questions sheet («Belchatow_Questions_EN.pdf»).

1. **Who is the named anchor tenant?** No hyperscaler (Microsoft / Google / Meta / Amazon / Oracle / Apple) has been publicly named ¹⁰⁰ Onet.
2. **Has financial close happened?** No PPA, construction loan, EPC contract or equity raise has been publicly announced.
3. **Why is Partners Group not in the KRS?** The only entity with a verifiable hyperscale track record is absent from the Polish registry.
4. **Will the company post a decommissioning bond?** Server refresh cycles of 3–5 years create a multi-decade e-waste stream; who pays to clean up?
5. **What firm power source covers years 5–20 of operation?** Lignite retires 2030–2036; large nuclear at the site is ~2040 at earliest.

Chapter 8 — How it looks elsewhere: comparative case studies

Independent evidence beats vendor PR. The seven cases below are ranked by source independence (academic / government > industry analyst > vendor), and each carries the lesson it implies for Bełchatów. Positive and cautionary cases appear in the same list — the goal is balance, not advocacy.

8.1 Loudoun County, Virginia ("Data Center Alley") — cautionary, water and air

The closest global analogue: a ~2.5 GW cluster of 200+ data centres in a single US county. Independent evidence is unusually strong here, anchored by the peer-reviewed Harvard/Frontiers 2026 study on health and economic damage ²⁴ Harvard C-CHANGE / Frontiers in Climate 2026.

- **Potable-water consumption for data centres rose ~250 % in four years** (to ~899 million gallons), even in a water-abundant basin ⁷³ VCNV.
- Data centres consume **~2 % of Potomac basin water annually, 8 % at summer peaks**, with measurable **aquifer decline, saltwater intrusion and land subsidence** ⁷⁴ Potomac Riverkeeper Network / Cardinal News.
- **Backup-generator air pollution causes an estimated \$53–99 million/year in health damages** for one large AI cluster ²⁵ Harvard / Frontiers.

Lesson for Bełchatów: even abundant water gets contested once it is industrial-scale. The community should pre-negotiate (a) water-disclosure requirements, (b) diesel-genset test-hour limits, (c) transmission-line routing, and (d) air-quality monitoring — all currently **absent** from the draft MPZP [A · §11, §20].

8.2 Republic of Ireland (Dublin) — cautionary, grid throttle

Ireland is the gold-standard regulatory-pause case: a government-imposed de-facto moratorium is the strongest empirical evidence that grid capacity can throttle DC growth mid-project ⁵⁰ Oireachtas Library research paper.

- EirGrid/CRU imposed a **de-facto moratorium on new Dublin DC connections in late 2021** because data-centre load was forecast to reach **31 % of national electricity demand by 2034** ⁷¹ KPMG.
- New Dublin connections reportedly paused until 2028 ⁷² DCD.
- Ireland shifted to a **criteria-based regime** (location in non-constrained regions, flexibility services, sustainability) ⁵⁰.

Lesson for Bełchatów: Bełchatów's lignite plant + transmission infrastructure is precisely the kind of pre-existing capacity Ireland lacked. But this cuts both ways — if PGE retires lignite on schedule (2030–2036) and the replacement (SMR, large nuclear, renewables + storage) lags, **Bełchatów could face its own Dublin-style freeze mid-project**.

8.3 Meta Odense (Denmark) — positive, waste-heat reuse at scale

The cleanest evidence that the EU EED waste-heat-reuse mandate is technically and economically feasible at scale in a cold-climate European city ⁹⁸ Meta; ⁷⁵ Ramboll.

- Meta Odense supplies **up to 25 MW thermal to ~6 900–11 000 homes** via a 44 MW heat-pump plant feeding Fjernvarme Fyn's district-heating network.
- Bełchatów town has an existing PGE district-heating footprint; the climate profile is comparable.

Lesson for Bełchatów: waste-heat reuse to the town's district heating should be a **non-negotiable design requirement**, not an option. Under EED Art. 26(6) it is already mandatory for any DC > 1 MW unless the operator documents infeasibility. The MPZP currently contains **no waste-heat reuse mandate** — this is the highest-leverage single condition to insert via uwagi.

8.4 Netherlands — cautionary, land-use policy

A clean policy-evolution arc from moratorium to designated zones ⁷⁶ CMS legal analysis; ⁷⁷ DCD.

- **2019 Amsterdam moratorium → 2022 national nine-month moratorium → 2024 decree banning new hyperscale DCs (>70 MW or >10 ha) outside designated zones** ⁷⁶.
- As of 2025, Amsterdam is allowing no new DCs in the municipality at all ⁷⁸ NL Times.

Lesson for Bełchatów: even within a welcoming national framework, city-level resistance can stall indefinitely. The Polish MPZP consultation now open for Domiechowice (closes 28 Aug 2026) is the moment to set binding conditions; once the plan is adopted, the leverage shifts to the slower building-permit / DŚU stage.

8.5 Singapore — positive, conditional green reopening

The cleanest example of a state pivoting from moratorium to conditional reopening with green strings attached ⁷⁹ DCD; ⁸⁰ Linklaters.

- **2019 moratorium** (water + grid stress) → **lifted 2022** with conditions: at least **300 MW of new capacity** reserved for operators meeting Green DC standards; **>200 MW** reserved for green-leading operators.

Lesson for Bełchatów: Singapore proves that **conditional approval with binding green KPIs (PUE, WUE, carbon intensity, waste-heat reuse) is feasible**. These can become Bełchatów MPZP / DŚU conditions verbatim.

8.6 China "East Data West Computing" (EDWC) — structural analogue

A state-led relocation of compute from coastal demand centres to renewable-rich (and coal-rich) interior provinces: Guizhou, Inner Mongolia, Ningxia, Gansu. Structurally similar to Bełchatów: repurposing a coal-region to host compute ⁸¹ China-Briefing; ⁸³ Jamestown.

- 2022 national plan: **eight major compute hubs, ~10 national DC clusters**; Guizhou alone hosts ~49 DCs (~92.6 exaflops).
- Independent critique: "Eastern Data Western Compute is Fake" — interior clusters still serve coastal demand, and the *compute relocation* is partial ⁸² ChinaTalk.
- Guizhou's success is tied to **cooler climate + cheap hydro/coal + provincial incentives + guaranteed state offtake**.

Lesson for Bełchatów: state-led DC relocation to coal-transition regions has precedents, but **guaranteed offtake (state or hyperscaler PPA)** is the binding condition. Without it, projects stall or end up as "empty investments" (*puste inwestycje*) — the phrase used by ex-Energetyka24 editor Jakub Wiech to describe the share of Polish DC pipeline projects that hold grid-connection conditions without any real intent to build ¹⁰⁰ Onet quoting Wiech.

8.7 Prime Data Centers Esbjerg (ESB01, Denmark) — a live case to watch

Announced March 2026 by **Prime Data Centers** (campus ESB01), Esbjerg is a hyperscale campus **entering its environmental impact assessment (EIA) now** — a live EIA to watch. It is the closest real-time analogue for how a serious European EIA on a hyperscale DC looks — what the operator volunteers, what the regulator demands, what conditions get attached ⁹⁹ Prime Data Centers.

Lesson for Bełchatów: monitor Esbjerg's EIA as a benchmark. Whatever noise, water, EMF, waste-heat and decommissioning conditions the Danish authorities impose there are credible lower bounds for what the Bełchatów community should demand in the DŚU proceeding here.

8.8 Synthesis table

Dimension	Loudoun VA	Ireland	Odense	Netherlands	Singapore	China EDWC	Bełchatów (today)
Permanent jobs	low (50–200/site) ⁴⁹	low	low	low	low	mixed (state-driven)	undisclosed
Water risk	severe (250 % rise; 8 % summer peaks) ⁷³ VCNV; ⁷⁴ Potomac Riverkeeper	low	low	low	severe (moratorium cause)	mixed	[UNVERIFIED] — no cap in MPZP §20
Noise	contested ²⁵	regulated	regulated	regulated	regulated	regulated	no dB in MPZP; defers to rozporządzenie Dz.U. 2014 poz. 112
Grid	abundant	frozen (moratorium)	ample	constrained	constrained → moratorium	state-built	500 MW connection conditions secured ² ; firmness 5–20 yrs [UNVERIFIED]
Waste-heat reuse	rare	partial	25 MW _{th} → ~6 900–11 000 homes ⁹⁸	partial	partial	rare	none planned (MPZP silent; EED Art. 26(6) mandatory)

Outcome	growth + litigation	morato- rium	accepted (waste-heat deal)	morato- rium → zoning	conditional reopening	state-led buildout	under consultation — conditions still negotiable
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Chapter 9 — Conclusion and how to submit your uwagi

9.1 A balanced read

The Domiechowice project could be a genuine **post-coal opportunity** for Bełchatów. The region has the grid, the road, the rail and the water; the "Bełchatów 2.0" narrative is real; a serious hyperscale campus would bring tax revenue, some permanent jobs, and a strategic footprint in a sector Poland is actively courting (BGK's €25 M PIMCO DC investment, KPO's €1.2 bn digital line, the cabinet's January 2026 energy-law overhaul) ⁴⁴ BGK; ⁴⁰ EC; ⁵⁸ Reuters.

But two things are not yet established, and today both of them are decisive.

1. **The investor's seriousness.** The KRS-listed shareholders (NEXT DC Sp. z o.o., incorporated 8 Sep 2025 with 6 250 PLN share capital (as of August 2026) and a -48 900 PLN 2025 net loss; EXUS DIGITAL LDA) have **no proven operating hyperscale track record**. The gmina's named "main investor" — Partners Group Holding AG — has a genuine track record (atNorth, EdgeCore, GreenSquareDC) but is **not visible in the Polish KRS** and has made no public disclosure of a Bełchatów investment ⁷ KRS; ⁹⁴ Partners Group PR archive; ¹⁰⁰ Onet.
2. **The operating conditions.** The draft MPZP explicitly permits data centres (*centra przetwarzania danych*) at §11(2) and §28(1)(d) but locks in **none of the operating limits** that matter: no noise dB at the property line, no water-draw volume cap, no PUE/WUE target, no EMF limit, no waste-heat reuse mandate, no decommissioning bond, no Seveso prohibition (§11(5) actually permits Seveso-class sites) [A · §11, §20, §28].

These two gaps are the entire reason this report exists. Neither is fatal — but both are fixable only **now**, while the MPZP consultation is live and before the *decyzja o środowiskowych uwarunkowaniach* (DŚU) is issued.

The decisive window is the live consultation: 31 July → 28 August 2026, with the open meeting of 13 August at 16:00 (already held). After that, leverage shifts to slower, higher-evidence-bar channels (DŚU public participation, WSA challenge to the adopted *uchwała*, WIOŚ complaints, civil suit, EU complaint). Note: a *skarga do WSA* under art. 101 u.s.g. typically takes **months to years**, not days — set expectations accordingly, but file the *uwagi* anyway to build the paper trail.

9.2 Act now — after the 28 August 2026 consultation window

Open community meeting: held **13 August 2026, 16:00**, Urząd Gminy Bełchatów (room 32); the questions and materials remain current for further written correspondence. **Designer duty hour (*dyżur projektanta*):** 13 August 2026, 17:00–18:00. **The formal *uwagi* (comments) window:** closed **28 August 2026**; the templates below remain usable for further correspondence. ² Urząd Gminy Bełchatów

How to submit uwagi (paper or e-mail):

- **E-mail:** sekretariat@ugbelchatow.pl
- **Address:** Urząd Gminy Bełchatów, ul. Kościuszki 13, 97-400 Bełchatów
- **In person:** Urząd Gminy, **room 32**

- Required contents: name / org name + address + (optionally) whether you are owner or perpetual usufructuary (*użytkownik wieczysty*) of an affected property, plus the specific plan-provision being objected to.
- Legal basis: **art. 8i ust. 1 pkt 1 in connection with art. 17 pkt 11 and 13** of the *ustawa o planowaniu i zagospodarowaniu przestrzennym* (Dz.U. 2026 poz. 538).

9.2.1 Ready-to-use Polish uwagi template (copy, fill, send)

Bełchatów, dnia r.

Wnioskodawca: [imię i nazwisko, adres, e-mail, telefon]

Adresat: **Wójt Gminy Bełchatów**, Urząd Gminy Bełchatów, ul. Kościuszki 13, 97-400 Bełchatów
(sekretariat@ugbelchatow.pl)

UWAGI DO PROJEKTU MPZP DLA OBSZARU STREFY GOSPODARCZEJ W MIEJSCOWOŚCI DOMIECHOWICE (w trybie art. 8i ust. 1 pkt 1 w zw. z art. 17 pkt 11 i 13 ustawy z 27 marca 2003 r. o planowaniu i zagospodarowaniu przestrzennym — Dz.U. 2026 poz. 538)

Oświadczam, że [jestem / nie jestem] właścicielem lub użytkownikiem wieczystym nieruchomości objętej projektem planu lub nieruchomości sąsiadującej.

Wnoszę o wprowadzenie następujących zmian do projektu planu:

A. Limit hałasu na granicy terenu — do §11 dodać ustęp: "Dla centrów przetwarzania danych dopuszczalny poziom hałasu, wyrażony wskaźnikami LAeqD i LAeqN, mierzony na granicy terenu inwestora, nie może przekraczać **50 dB LAeqD i 40 dB LAeqN** dla źródeł przemysłowych" (klasa 2a rozporządzenia w sprawie dopuszczalnych poziomów hałasu, Dz.U. 2014 poz. 112).

B. Obowiązek odzysku ciepła odpadowego — do §11 dodać ustęp implementujący **art. 26 ust. 6 dyrektywy (UE) 2023/1791** dla centrów danych > 1 MW, ze wskazaniem przedsiębiorstwa ciepłowniczego obsługującego miasto Bełchatów jako odbiorcy.

C. Limit poboru wody — do §20 dodać: "Całkowity pobór wód na potrzeby chłodzenia centrów danych nie może przekraczać [X] m³/dobę" (na podstawie raportu hydrologicznego dla zlewni Widawki).

D. Wykreślenie zakładów Seveso — wykreślić z §11 ust. 5 zapis dopuszczający zakłady o zwiększonym / dużym ryzyku wystąpienia poważnej awarii przemysłowej.

E. Publiczna publikacja PUE — do §11 dodać: "Operator publikuje corocznie wskaźnik PUE w Bazie Danych o Centrach Danych UE (rozporządzenie delegowane Komisji (UE) 2024/1364)."

Uzasadnienie: [1–2 zdania do każdego punktu — np. "Punkt A jest niezbędny dla ochrony snu mieszkańców Domiechowic w świetle wytycznych WHO (NNG 2009, 40 dB Lnight) i klasy 2a rozporządzenia Dz.U. 2014 poz. 112."]

Z poważaniem, [podpis]

(Note: one person can submit multiple points; multiple residents can submit identical uwagi — the wójt counts heads.)

9.2.2 Ready-to-use Polish FOI template (RDOŚ / PPIS letters)

The prognoza references — but does **not reproduce** — two letters that shaped the draft plan: RDOŚ Łódź letter **WOOŚ.411.636.2025.AJa.2** (29 Dec 2025) and PPIS Bełchatów letter **ZNS.90280.1718.2025** (7 Jan 2026) [A · §11.17]. You have a legal right to obtain them in full under the *ustawa o dostępie do informacji publicznej* (Dz.U. 2022 poz. 902) and the *ustawa o udostępnianiu informacji o środowisku* (Dz.U. 2026 poz. 670).

Miejscowość, data:

Wnioskodawca: [imię, adres, e-mail]

Adresat: **Regionalny Dyrektor Ochrony Środowiska w Łodzi**, ul. Traugutta 25, 90-113 Łódź — e-mail iod.lodz@rdos.gov.pl (lub: Państwowy Powiatowy Inspektor Sanitarny w Bełchatowie, ul. Okrzei 49, 97-400 Bełchatów — sekretariat.psse.belchatow@sanepid.gov.pl)

WNIOSEK O UDOSTĘPNIENIE INFORMACJI PUBLICZNEJ (art. 2 ust. 1 i art. 10 ust. 1 u.d.i.p.; art. 13 i 21 ustawy z 3 X 2008 r. o udostępnianiu informacji o środowisku — Dz.U. 2026 poz. 670)

Wnoszę o przesłanie pełnej treści z załącznikami:

1. pisma RDOŚ w Łodzi znak **WOOŚ.411.636.2025.AJa.2** z 29 grudnia 2025 r., stanowiącego uzgodnienie zakresu prognozy oddziaływania na środowisko dla projektu MPZP dla obszaru strefy gospodarczej w Domiechowicach;
2. (dla PPIS) pisma PPIS w Bełchatowie znak **ZNS.90280.1718.2025** z 7 stycznia 2026 r.

Informację proszę udostępnić w formie elektronicznej (PDF), bezpłatnie, na adres e-mail wskazany we wniosku.

Z poważaniem,

Statutory reply deadline: **14 days** (extendable to 2 months for "sprawy szczególnie skomplikowane"). Silence or refusal is appealable via **skarga do WSA** (Wojewódzki Sąd Administracyjny) within 30 days.

9.3 What "serious" looks like — a brief checklist

A serious investor would welcome every item below. If the answer to any line is "no" or "we'll decide later", that condition belongs in your uwagi.

- ☐ **Named anchor tenant** (a hyperscaler — Microsoft / Google / Meta / Amazon / Oracle / Apple — or a credible named enterprise offtaker).
- ☐ **Financial close** disclosed (PPA + construction loan + EPC contractor + equity raise).
- ☐ **Binding PUE / WUE / noise dB / water-draw** targets written into the MPZP and the DŚU — not deferred to a later building permit.
- ☐ **Waste-heat reuse plan** to Bełchatów town district heating, in compliance with EED Art. 26(6).
- ☐ **Firm power source for years 5–20** (post-lignite); if nuclear/SMR is claimed, the timeline.
- ☐ **Decommissioning bond** sized against server-refresh and building-life cycles.
- ☐ **Independent environmental monitoring** funded by the operator, with data published.
- ☐ **Local-jobs minimum** written into a host-community agreement.
- ☐ **Partners Group (or equivalent institutional capital) confirmed in the KRS**, not only in a press statement.
- ☐ **The gmina's "2.5–3× Elektrownia" property-tax model published** with a downside scenario (what happens if NSA reverses again).

9.4 Bottom line

This is not a brief for or against the project. It is a brief for getting specific things in writing before the consultation window closes on 28 August 2026. The single most useful thing the residents of Domiechowice (Gmina Bełchatów) can do this month is: **send the uwagi, send the FOI, use the questions in the separate Questions sheet («Belchatow_Questions_EN.pdf») — in written correspondence (the 13 August open meeting has been held; its minutes are part of the consultation record) — and insist on the conditions in §9.3.** A serious investor will answer; an unserious one will leave those answers vague — which is itself useful information.

Glossary / Słowniczek

Polish-formal and technical acronyms used in this report. Polish expansions are preserved where they are the operative legal/administrative term; English glosses follow.

Polish planning, environmental, and administrative law

Acronym / term	Expansion (Polish)	English gloss
MPZP	<i>Miejscowy Plan Zagospodarowania Przestrzennego</i>	Local Spatial Development Plan — the binding land-use plan adopted by gmina <i>uchwala</i> . The Domiechowice draft is the central object of this report.
WT	<i>Warunki techniczne</i> (Dz.U. 2022 poz. 1225)	Technical-conditions regulation every building permit must satisfy (fire setbacks, fuel/gas siting, noise, stormwater, backup power); §6.8.
PINB	<i>Powiatowy Inspektor Nadzoru Budowlanego</i>	District construction-supervision inspector — takes WT-violation reports (art. 81–84 Prawa budowlane); §6.8.
plan ogólny	<i>Plan ogólny gminy</i>	New mandatory gmina-wide zoning document introduced by the 2023 planning reform; replaces the former <i>studium uwarunkowań</i> . Every MPZP must be consistent with it.
studium uwarunkowań	<i>Studium uwarunkowań i kierunków zagospodarowania przestrzennego</i>	Pre-2023 gmina-wide zoning study; replaced by <i>plan ogólny</i> .
strefa gospodarcza	<i>Strefa gospodarcza</i>	Economic zone — the planning designation on the Domiechowice site in the <i>plan ogólny</i> .
uchwała	<i>Uchwała Rady Gminy</i>	Resolution of the gmina council; the legal form of MPZP adoption.
P-U-I	<i>Tereny zabudowy produkcji, usług oraz infrastruktury technicznej</i>	Production, services and technical-infrastructure land-use designation (the draft MPZP zone for the site).
SP	<i>Strefa produkcji i usług</i> (in the <i>plan ogólny</i>)	Production-and-services zone (designation in the <i>plan ogólny</i>).
KDZ, KDR	<i>Klasa dróg: zbiorcza / główna ruchu przyspieszonego</i>	Road classes on the zoning map: collector road / main accelerated road.
AZP	<i>Archeologiczne Zdjęcie Polski</i>	Polish Archaeological Record — the national surface-survey grid; site 75-50/26 covers the DC parcel.
DŚU	<i>Decyzja o środowiskowych uwarunkowaniach</i>	Environmental decision — as a rule issued by the Wójt (art. 75 uioś), for catalogue undertakings by RDOŚ; carries binding environmental conditions for a project.

RDOŚ	<i>Regionalny Dyrektor Ochrony Środowiska</i>	Regional Director for Environmental Protection — issues the binding agreement on implementation conditions in every DŚU and decides catalogue undertakings (for Belchatów: RDOŚ w Łodzi).
GDOŚ	<i>Generalny Dyrektor Ochrony Środowiska</i>	General Director for Environmental Protection — the appeal body from a RDOŚ environmental decision.
WIOŚ	<i>Wojewódzki Inspektorat Ochrony Środowiska</i>	Voivodeship Inspectorate for Environmental Protection — enforcement and periodic measurement authority (here: WIOŚ Łódź, delegatura Belchatów).
PPIS / PSSE	<i>Powiatowy Inspektorat Sanitarny / Powiatowa Stacja Sanitarno-Epidemiologiczna</i>	District (powiat) sanitary inspector / sanitary-epidemiological station — issues scoping opinions in environmental proceedings.
SIOŚ	<i>Spółeczny Inspektor Ochrony Środowiska</i>	Civic (voluntary) environmental inspector — a statutory post any resident can be appointed to.
Wody Polskie (PGW WP)	<i>Państwowe Gospodarstwo Wodne Wody Polskie</i>	State Water Holding Polish Waters — the <i>pozwolenie wodnoprawne</i> (water-abstraction permit) authority.
prognoza	<i>Prognoza oddziaływania na środowisko</i>	Strategic Environmental Assessment (SEA) forecast — the environmental-impact report that must accompany an MPZP.
SEA	Strategic Environmental Assessment	EU-mandated environmental-impact assessment for plans and programmes (the <i>prognoza</i> is the Polish SEA).
EIA	Environmental Impact Assessment	Project-level environmental-impact assessment (Polish: <i>ocena oddziaływania na środowisko</i>), conducted at the DŚU stage.
raport OOŚ	<i>Raport o oddziaływaniu na środowisko</i>	Project-level environmental-impact report filed by the applicant at the DŚU stage.
u.p.z.p.	<i>Ustawa z 27 marca 2003 r. o planowaniu i zagospodarowaniu przestrzennym</i>	Polish Planning and Spatial-Development Act (Dz.U. 2026 poz. 538).
u.s.g.	<i>Ustawa o samorządzie gminnym</i>	Act on Gmina Self-Government — contains art. 101 <i>skarga do WSA</i> standing for residents.
u.o.ś. / uioś	<i>Ustawa z 3 października 2008 r. o udostępnianiu informacji o środowisku i jego ochronie, udziale społeczeństwa w ochronie środowiska oraz o ocenach oddziaływania na środowisko</i>	Act on access to environmental information, public participation in environmental protection, and EIA/SEA (Dz.U. 2026 poz. 670).
PPSA	<i>Prawo o postępowaniu przed sądami administracyjnymi</i>	Polish Code of Procedure before Administrative Courts.
KC	<i>Kodeks cywilny</i>	Polish Civil Code; art. 144 governs <i>immisions</i> (excessive noise/vibration/dust from a neighbour).

Dz.U.	<i>Dziennik Ustaw</i>	Polish Official Journal of Laws — the publication channel for statutes and regulations.
ISAP / ELI	<i>Internetowy System Aktów Prawnych / European Legislation Identifier</i>	Polish online legal-acts system / EU cross-jurisdiction legislation identifier.
TK	<i>Trybunał Konstytucyjny</i>	Constitutional Tribunal (issued judgment SK 14/21 on real-estate tax).
WSA	<i>Wojewódzki Sąd Administracyjny</i>	Voivodeship Administrative Court (for Bełchatów: WSA w Łodzi).
NSA	<i>Naczelny Sąd Administracyjny</i>	Supreme Administrative Court — second-instance review of WSA judgments.
RODO / GDPR	<i>Ogólne Rozporządzenie o Ochronie Danych</i>	EU General Data Protection Regulation (2016/679).
RPO	<i>Rzecznik Praw Obywatelskich</i>	Polish Ombudsman for Citizens' Rights.

Polish government, energy, and corporate actors

Acronym / term	Expansion (Polish)	English gloss
Wójt	<i>Wójt Gminy</i>	Head of a rural gmina (the executive). For Gmina Bełchatów: Dr Konrad Koc.
Rada Gminy	<i>Rada Gminy</i>	Gmina council — the legislative body that adopts the MPZP by <i>uchwała</i> .
Sołtys	<i>Sołtys</i>	Elected village head (<i>sołectwo</i> level); for Domiechowice: the closest elected official to residents.
Sołectwo Domiechowice	<i>Sołectwo Domiechowice</i>	Domiechowice village auxiliary unit (<i>sołectwo</i>) within Gmina Bełchatów.
Urząd Gminy Bełchatów	<i>Urząd Gminy Bełchatów</i>	Office of the Rural Gmina of Bełchatów (seat: ul. Kościuszki 13, 97-400 Bełchatów).
Miasto Bełchatów	<i>Miasto Bełchatów</i>	The town of Bełchatów — a <i>separate</i> urban municipality from Gmina Bełchatów.
Wojewoda Łódzki	<i>Wojewoda Łódzki</i>	Voivode (central-government regional representative) for Łódzkie voivodeship.
Marszałek	<i>Marszałek Województwa Łódzkiego</i>	Marshal of the Łódzkie Voivodeship — head of the regional self-government.
Starosta Bełchatowski	<i>Starosta Bełchatowski</i>	Starosta of Bełchatów County (<i>powiat</i>).
PSE	<i>Polskie Sieci Elektroenergetyczne S.A.</i>	Polish Transmission System Operator — operates the ≥ 220 kV grid.
PGE	<i>Polska Grupa Energetyczna</i>	Polish state-controlled energy group.

PGE GiEK	<i>PGE Górnictwo i Energetyka Konwencyjna S.A.</i>	PGE Mining & Conventional Generation — operator of Elektrownia Bełchatów and the linked lignite mines.
PGE Dystrybucja	<i>PGE Dystrybucja S.A.</i>	PGE's distribution-system operator (DSO) at ≤110 kV in this region.
Elektrownia Bełchatów	<i>Elektrownia Bełchatów</i>	Bełchatów Power Station — the EU's largest lignite-fired plant (~5.1 GWe), operated by PGE GiEK.
KWB Bełchatów	<i>Kopalnia Węgla Brunatnego Bełchatów</i>	Bełchatów Lignite Mine — the open-pit mine supplying the power station; runs a regional aquifer-dewatering operation.
EU ETS	European Union Emissions Trading System	EU-wide cap-and-trade for CO ₂ from large stationary sources; Elektrownia Bełchatów has been the #1 emitter since 2005.
EU JTF	European Union Just Transition Fund	EU fund supporting regions exiting fossil fuels; Łódzkie's access is conditional on PGE honouring the lignite retirement schedule.
GPZ	<i>Główny Punkt Zasilający</i>	Main 110 kV supply substation (GPZ Kurnos / GPZ Rogowiec adjacent to the Elektrownia Bełchatów switchyard).
HV / EHV	High Voltage / Extra-High Voltage	110 kV (HV) / 220–400 kV (EHV) class transmission.
BGK	<i>Bank Gospodarstwa Krajowego</i>	Polish state development bank.
PAIH	<i>Polska Agencja Inwestycji i Handlu</i>	Polish Investment and Trade Agency.
PSI	<i>Polska Strefa Inwestycji</i>	Polish Investment Zone — nationwide CIT/PIT-exemption support scheme.
KPO	<i>Krajowy Plan Odbudowy</i>	Polish National Recovery and Resilience Plan (funded by the EU Recovery and Resilience Facility).
KRS	<i>Krajowy Rejestr Sądowy</i>	Polish National Court Register — the official company registry.
NIP, REGON	<i>Numer Identyfikacji Podatkowej / Rejestr Gospodarki Narodowej</i>	Polish tax-ID / statistical-business-ID numbers.
PEJ	<i>Polskie Elektrownie Jądrowe S.A.</i>	Polish Nuclear Power Plants (state SPV for the Lubiatowo-Kopalino AP1000 project).
NCBR	<i>Narodowe Centrum Badań i Rozwoju</i>	Polish National Centre for Research and Development.
EuroHPC JU	European High-Performance Computing Joint Undertaking	EU body procuring and operating EuroHPC supercomputers and AI Factories.
PZCD	<i>Polski Związek Centrów Danych</i>	Polish Data Center Association (industry body; source of sector-economic estimates with PwC).

Polish procedural terms (used verbatim in this report)

Term	Polish expansion	English gloss
uwagi	<i>Uwagi do projektu planu</i>	Formal public comments on a draft MPZP (art. 8i ust. 1 pkt 1 in connection with art. 17 pkt 11 and 13 u.p.z.p.).
rozpatrzenie uwag	<i>Rozpatrzenie uwag</i>	Wójt's written disposition of comments (not itself appealable under art. 8l u.p.z.p.).
opłata planistyczna	<i>Oplata planistyczna</i>	Planning fee — one-time up-to-30 % land-value-uplift levy on the seller, charged on a sale within 5 years of the plan entering into force; art. 36 ust. 4 u.p.z.p.
decyzja o środowiskowych uwarunkowaniach (DŚU)	<i>Decyzja o środowiskowych uwarunkowaniach</i>	Environmental decision; authority: as a rule the Wójt, for catalogue undertakings RDOŚ (art. 75 uioś).
pozwolenie wodnoprawne	<i>Pozwolenie wodnoprawne</i>	Water-law permit (issued by Wody Polskie); sets the binding volumetric water cap.
skarga do WSA	<i>Skarga do Wojewódzkiego Sądu Administracyjnego</i>	Complaint to the Voivodeship Administrative Court.
dyżur projektanta	<i>Dyżur projektanta</i>	Designer's duty hour — formal Q&A session with the plan's designer.
użytkownik wieczysty	<i>Użytkownik wieczysty</i>	Perpetual usufructuary — a Polish land-tenure form.
miara przeciętna	<i>Miara przeciętna</i>	"Average standard" of the locality — the threshold in KC art. 144 immisions cases.
zakłady o zwiększonym / dużym ryzyku	<i>Zakłady o zwiększonym ryzyku / dużym ryzyku wystąpienia poważnej awarii przemysłowej</i>	Lower-tier / upper-tier Seveso major-accident-hazard establishments (permitted by MPZP §11(5)).
agregaty prądotwórcze	<i>Agregaty prądotwórcze</i>	Standby diesel/gas generating sets.
studnie	<i>Studnie wiercone</i>	Wells — permitted by MPZP §20 as an interim water source.
grunty leśne Skarbu Państwa	<i>Grunty leśne Skarbu Państwa</i>	State Treasury forest lands (border the DC site).
klasa A/B/C (PM10)	<i>Klasy A/B/C (PM10)</i>	Polish air-quality assessment classes; klasa C = exceeds the binding limit (non-attainment).
klasa 2a (noise receptor)	<i>Podklasa 2a</i>	Single-family-housing noise receptor class under Dz.U. 2014 poz. 112 Annex — applies at the Domiechowice property line.

International standards, directives, and technical acronyms

Acronym	Expansion	One-line meaning
WHO	World Health Organization	UN health agency; issued the <i>Night Noise Guidelines for Europe</i> (2009) and <i>Environmental Noise Guidelines</i> (2018).
IEA	International Energy Agency	OECD energy watchdog.
EEA	European Environment Agency	EU environmental data agency.
EIA (US)	Energy Information Administration	US Department of Energy statistical agency.
EED	Energy Efficiency Directive (EU)	Directive (EU) 2023/1791; Art. 12 mandates DC KPI reporting; Art. 26(6) mandates waste-heat recovery for DCs >1 MW.
END	Environmental Noise Directive	EU Directive 2002/49/EC; sets Lden/Lnight mapping thresholds (not health limits).
DCD	Delegated Regulation (EU) 2024/1364	Defines the PUE/REF/WUE KPIs that DCs must report under EED Art. 12.
EU Battery Reg	Regulation (EU) 2023/1542	EU framework for battery waste, including lithium-ion UPS banks.
WEEE	Waste Electrical and Electronic Equipment	EU Directive 2012/19/EU; covers DC server-refresh e-waste.
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals	EU Regulation 1907/2006; emerging PFAS restriction affects two-phase immersion cooling.
PFAS	Per- and Polyfluoroalkyl Substances	"Forever chemicals" used in two-phase immersion coolants and some fire-suppression agents.
EMF	Electromagnetic Field	From on-site 110/220/400 kV substations; MPZP §22 permits HV/EHV substations without an EMF limit.
PUE	Power Usage Effectiveness	Total facility power ÷ IT-equipment power (1.0 = ideal). Industry average ~1.55; hyperscale <1.4; best-in-class ~1.09.
WUE	Water Usage Effectiveness	Litres of water consumed per kWh of IT load. Legacy installed-base average ~1.9 L/kWh (EESI); new fleets 0.12–0.5; sealed dry loop ≈ 0 for cooling.
REF, REF-T	Renewable Energy Factor (total)	KPI under Delegated Reg (EU) 2024/1364.
CRAH / D2C	Computer Room Air Handler / Direct-to-Chip (liquid cooling)	Cooling architectures; D2C is the de-facto standard for AI racks >60 kW.
K (kelvin)	SI unit of thermodynamic temperature	For temperature differences 1 K = 1 °C (a ~1–2 K warming = a ~1–2 °C warming). Used in the literature for heat-island and waste-heat deltas.
UPS	Uninterruptible Power Supply	Battery or flywheel-backed power for ride-through and conditioning.

BESS	Battery Energy Storage System	Lithium-ion (typically) on-site storage for peak-shaving / UPS hybridisation.
SMR	Small Modular Reactor	Reactor <300 MWe/module; Orlen BWRX-300 (Włocławek) is Poland's lead SMR project.
AP1000	Westinghouse AP1000 pressurised-water reactor	Design selected for the Lubiatowo-Kopalino nuclear station ($3 \times \sim 1$ GWe).
TSO / DSO	Transmission / Distribution System Operator	PSE (TSO ≥ 220 kV); PGE Dystrybucja (DSO ≤ 110 kV).
PPA	Power Purchase Agreement	Contracted power supply; "24/7 CFE PPA" = 24/7 Carbon-Free Energy PPA.
REC	Renewable Energy Certificate	Tradable certificate representing 1 MWh of renewable generation.
FDI	Foreign Direct Investment	Subject to Polish screening under Dz.U. 2026 poz. 47.
TerraByte Data Centers	—	UK company founded by Afonso Salema (Sep 2024); no operating facility located in negative search.
Start Campus Sines	—	Portuguese 495 MW DC project; Salema led as CEO until Nov 2023 resignation.
Operação Influencer	—	Portuguese corruption investigation; Salema named <i>arguido</i> ; open as of Sep 2025.
Aarhus Convention	—	UNECE convention on access to information, public participation, and justice in environmental matters (1998).

Data-centre tier, redundancy, and design terms

Term	Meaning
Hyperscale	A data centre scaled to tens-to-hundreds of MW of IT load, typically for a single hyperscaler or large colocation operator.
Colocation	Multi-tenant data-centre operator model.
Uptime Tier III	Concurrently maintainable, N+1 redundancy; ~ 99.982 % availability (≈ 94 min/yr outage).
Uptime Tier IV	Fault tolerant, 2N redundancy; ~ 99.995 % availability (≈ 26 min/yr outage).
N+1 / 2N redundancy	One standby component per N active / doubled (active + standby) components.
Capacity factor (CF)	Actual annual energy $\div$ nameplate $\times 8\,760$ h. AI training approaches 100 %; enterprise DCs 60–80 %.
Scope 2 emissions	Indirect emissions from purchased electricity; "market-based" uses REC/PPA accounting; "location-based" uses grid-average intensity.

Online / citizen-action terms

Term	Polish	Meaning
FOI / u.d.i.p.	<i>Wniosek o udostępnienie informacji publicznej</i>	Freedom-of-Information request under the Polish Act on Access to Public Information (Dz.U. 2022 poz. 902).
BIP	<i>Biuletyn Informacji Publicznej</i>	Public Information Bulletin — the official Polish government transparency portal.
UG Bełchatów	<i>Urząd Gminy Bełchatów</i>	Office of the Rural Gmina of Bełchatów (shorthand used in this report).

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Tier policy: **A** = authoritative non-vendor (IEA, WHO, EU/national regulators, peer-reviewed, government EIA/decisions, Polish/EU statutes); **B** = reputable outlets and think tanks; **C** = vendor / promotional (used only for "company claims X" framing); **D** = local press / unverified.

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<https://goodjobsfirst.org/will-data-center-job-creation-live-up-to-hype-i-have-some-concerns/>

71. KPMG Ireland — Ireland's DC policy reset

<https://kpmg.com/ie/en/insights/energy-utilities-telecoms/irelands-data-centre-policy-reset.html>

72. Data Center Dynamics — EirGrid: no new Dublin DC applications till 2028

<https://www.datacenterdynamics.com/en/news/eirgrid-says-no-new-applications-for-data-centers-in-dublin-till-2028/>

73. VCNV — Responsible data-center development (Loudoun water)

<https://vcnva.org/agenda-item/responsible-data-center-development/>

74. Cardinal News — Virginia faces a collision of policy choices on DCs

<https://cardinalnews.org/2026/08/04/virginia-faces-a-collision-of-policy-choices-on-data-centers-and-energy/>

75. Ramboll — Meta surplus heat to district heating (Odense)

<https://www.ramboll.com/en-us/projects/energy/meta-surplus-heat-to-district-heating>

- 76. CMS** — Netherlands prohibits new hyperscale DCs outside designated zones
<https://cms.law/en/nld/legal-updates/Netherlands-prohibits-creating-hyperscale-data-centres-until-national-guidelines-are-passed>
- 77. Data Center Dynamics** — Amsterdam moratorium ongoing impact
<https://www.datacenterdynamics.com/en/analysis/the-ongoing-impact-of-amsterdams-data-center-moratorium/>
- 78. NL Times** — Amsterdam not allowing new DCs in the municipality (2025)
<https://nltimes.nl/2025/04/18/amsterdam-allowing-data-centers-municipality>
- 79. Data Center Dynamics** — Singapore lifts DC moratorium with conditions
<https://www.datacenterdynamics.com/en/news/singapore-lifts-data-center-moratorium-but-sets-conditions/>
- 80. Linklaters** — Singapore announces ≥ 300 MW DC capacity with green conditions
<https://sustainablefutures.linklaters.com/post/102jb2x/singapore-announces-at-least-300-megawatts-increase-in-data-centre-capacity-with>
- 81. China-Briefing** — China's cross-regional DC plan (East Data West Computing)
<https://www.china-briefing.com/news/china-data-centers-new-cross-regional-plan-to-boost-computing-power-across-regions/>
- 82. ChinaTalk** — "Eastern Data Western Compute is Fake"
<https://www.chinatalk.media/p/eastern-data-western-compute-is-fake>
- 83. Jamestown** — Energy and AI coordination in EDWC
<https://jamestown.org/energy-and-ai-coordination-in-the-eastern-data-western-computing-plan/>
- 84. Crowe** — Polish Investment Zone conditions, procedure, practical aspects
<https://www.crowe.com/pl/en-us/insights/polish-investment-zone-conditions-procedure-and-practical-aspects>
- 85. EESI** — Data centres and water consumption
<https://www.eesi.org/articles/view/data-centers-and-water-consumption>
- 86. FWPCOA** — Data-centre water withdrawal overview
https://www.fwpcoa.org/content.aspx?page_id=5&club_id=859275&item_id=130961
- 87. KNews.pl** — DCs pump billions into the Polish economy (PwC/PZCD)
<https://knews.pl/article/469-centra-danych-pompuja-miliardy-w-polska-gospodarke-pod-belchatowem-szykuje-sie-jedna-z-najwiekszych-inwestycji-w-europie>
- 88. Wikipedia** — Partners Group Holding AG
https://en.wikipedia.org/wiki/Partners_Group
- 89. Alliance Chemical** — ASHRAE TC 9.9 thermal guidelines for AI DC cooling
<https://alliancechemical.com/blogs/articles/ashrae-tc-9-9-thermal-guidelines-ai-data-center-cooling>
- 90. Jornal de Negócios** — Ex-CEO of Start Campus on new DC project
<https://www.jornaldenegocios.pt/empresas/tecnologias/detalhe/ex-ceo-da-start-campus-tem-mil-milhoes-para-data-centers-fora-do-pais>

91. Público — Chicoespertice confession by ex-Start Campus manager (4 Jan 2024)

<https://www.publico.pt/2024/01/04/sociedade/noticia/chicoespertice-guloso-confessou-exgestor-start-campus-2075770>

92. ECO — Operação Influencer continues, no end in sight (17 Sep 2025)

<https://eco.sapo.pt/2025/09/17/quase-dois-anos-depois-operacao-influencer-continua-sem-fim-a-vista/>

93. Now Canal — Ex-Start Campus CEO raises >€1 bn for new DC project (16 Jan 2025)

<https://www.nowcanal.pt/ultimas/detalhe/ex-ceo-da-start-campus-angariou-um-investimento-superior-a-mil-milhoes-de-euros-para-um-novo-projeto-de-data-centers-fora-do-pais>

Tier C — Vendor / promotional (used only for "company claims X" framing)

94. Partners Group — press-release archive

<https://www.partnersgroup.com/en/news-and-views/press-releases>

95. NEXTDC Limited (Australian, ASX: NXT) — About us

<https://www.nextdc.com/about-us>

96. Wikipedia — NEXTDC Limited (Australia)

<https://en.wikipedia.org/wiki/NextDC>

97. Google — Data-centre efficiency dashboard

<https://datacenters.google/efficiency>

98. Meta — Engineering update on Odense DC waste-heat reuse

<https://tech.facebook.com/engineering/2020/7/odense-data-center-2/>

99. Prime Data Centers — ESB01 Esbjerg campus announcement

<https://primedatacenters.com/news/prime-data-centers-announces-plans-for-major-data-center-development-in-esbjerg-denmark/>

Tier D — Local press / unverified (late-appended entries graded per annotation)

The tier of the late-appended entries in this section follows their own annotations, not this heading: the gmina's investor co-produced "Myth" posts (refs 122, 131, 142) are TIER A as the gmina's own documents (the artefacts under analysis), while vendor catalogues and corporate press releases cited here (e.g. refs 111, 116, 118, 123, 130, 133–135, 143–144) are vendor-grade sources under the C rule above.

100. Onet — Kałach: "Na ich polach ma rosnąć sztuczna inteligencja..." (15 Jun 2026)

<https://wiadomosci.onet.pl/kraj/na-ich-polach-ma-rosnac-sztuczna-inteligencja-czy-sprzedadza-ziemie-pod-ai/ry2s7wc>

101. ŚwiatOZE.pl — Centrum danych AI w Bełchatowie (CFF critique)

<https://swiatoze.pl/centrum-danych-ai-w-belchatowie-co-zyskaja-a-co-straca-mieszkancy/>

102. ebelchatow.pl — Hyperscale DC project progressing per plan (2 Apr 2026)

<https://www.ebelchatow.pl/2026/04/02/projekt-hyperscale-data-center-w-gminie-belchatow-postepuje-zgodnie-z-planem/>

103. itwiz.pl — Bełchatów in the running for one of Europe's largest DCs

<https://itwiz.pl/belchatow-z-szansa-na-jedno-z-najwiekszych-centr-danych-w-europie/>

- 104.** baxtel.com — Hyperscale DC Bełchatów Poland listing
<https://baxtel.com/data-center/hyperscale-dc-belchatow-poland>
- 105.** TVP Łódź — Centrum danych Bełchatów (public-broadcaster coverage)
<https://lodz.tvp.pl/92348410/centrum-danych-belchatow>
- 106.** Rigorbiz / Iberinform — Portuguese commercial-registry aggregator: EXUS DIGITAL, UNIPessoal LDA (NIPC 518894541)
<https://www.rigorbiz.com> (NIPC 518894541 lookup) — aggregator mirroring the Portuguese *Registo Nacional de Pessoas Coletivas* (RNPC) / Portal da Justiça
- 107.** UK Companies House — EXUS SOFTWARE LTD (company no. 07932357)
<https://find-and-update.company-information.service.gov.uk/company/07932357> — separate UK entity; NOT the Polish-SPV shareholder
- 108.** Rejestr.io — connections graph for DATA CENTER BEŁCHATÓW (KRS 0000882677)
<https://rejestr.io/krs/882677/data-center-belchatow/powiazania> — Polish KRS affiliations network (NEXT/GLOBITEL/ENERGETYKA cluster)
- 109.** NEXT MOBILE PROSTA SPÓŁKA AKCYJNA — KRS 0001084040 (Rejestr.io)
<https://rejestr.io/krs/1084040/next-mobile> — NIP 7272820933; seat: Łódź, ul. Łąkowa 3/5
- 110.** Next Mobile P.S.A. — corporate history page (3 Jun 2024 merger incl. GLOBITEL)
<https://nextmobile.pl/marki/o-next-e/> — "Globitel sp. z o. o. is established in Łódź... merger of all our telecommunications companies"
- 111.** Exus Renewables — press release on 53 MW Polish wind assets (Paweł Szawłowski as Country Manager Poland, Jan 2026)
<https://exusrenewables.com/news/exus-renewables-commissions-53mw-of-wind-assets-in-poland-following-ppa-execution>
- 112.** GLOBITEL Sp. z o.o. — EMIS company profile (Łódź, founded 2007, telecom/ICT)
https://www.emis.com/php/company-profile/PL/_Globitel_Sp_z_oo_en_3396679.html
- 113.** krsly.pl — NEXT DATA SERVICES Sp. z o.o. (KRS 0001167273)
<https://krsly.pl/firma/0001167273> — shareholders include Piotr Sulik (28 shares) + Zbigniew Krzysztof Gawrych (20 shares)
- 114.** krsly.pl — DATA CENTER STANISŁAWÓW Sp. z o.o. (KRS 0001168621)
<https://krsly.pl/firma/0001168621> — second DC SPV in the same network; shareholders: Sulik, Gawrych, Szczech, Kozłowski, Sklinda
- 115.** UKE (Urząd Komunikacji Elektronicznej) — Polish public registry of telecommunications operators
<https://bip.uke.gov.pl/rejestr> — GLOBITEL Sp. z o.o. and NEXT MOBILE Sp. z o.o. listed as registered telco providers
- 116.** Partners Group — press release: "Partners Group to invest in Exus, an international renewables asset management and development firm" (Baar-Zug, 4 October 2023)
https://www.partnersgroup.com/news-and-views/press-releases/investment-news/detail?news_id=fac11494-cf82-49d3-8895-3d9580621f4c — up to €1 bn growth-capital investment in Exus Partners Holding
- 117.** Independent financial-press confirmation of the Partners Group → Exus investment (October 2023)
- PE Hub (4 Oct 2023): <https://www.pehub.com/partners-group-plans-e1bn-capital-infusion-in-exus/>

- Ropes & Gray (legal advisor to Partners Group, 4 Oct 2023): <https://www.ropesgray.com/en/news-and-events/news/2023/10/rg-advises-partners-group-on-its-investment-in-exus-a-leading>
- Cuatrecasas (legal advisor to Exus Partners Holding, 9 Oct 2023): <https://www.cuatrecasas.com/en/global/art/exus-secures-growth-capital-investment-of-up-to-one-billion-euros-from-partners-group-1>
- renewables.biz (4 Oct 2023): <https://www.renewables.biz/uncategorized/exus-receives-e1bn-in-investment/>
- IREI (6 Oct 2023): <https://irei.com/news/partners-group-pours-e1b-of-growth-capital-into-exus/>
- Les Echos press-release wire: <https://lesechos-comfi.lesechos.fr/press-release/partners-group-etr-partners-group-to-invest-in-exus-an-international-renewables-asset-management-and-development-firm-kX5M VVjsKxB>

118. Exus Renewables — press release: "Exus Renewables expands into Poland with 1.2 GW wind farm acquisitions" (19 December 2024)

<https://www.exusrenewables.com/news/exus-renewables-expands-into-poland-with-1-2gw-wind-farm-acquisitions> — 1 056 MW acquired from Energetyka Polska (July 2024); 53 MW two-farm portfolio west-central Poland; "established a Polish subsidiary and a strong local team"; PwC Poland advisor. Cross-confirmed by green-forum.eu (24 Dec 2024): <https://www.green-forum.eu/business/20241224/exus-renewables-acquires-12-gw-wind-portfolio-in-poland-1608>. Jan 2026 follow-up (53 MW commissioned in Poland following PPA execution): <https://www.exusrenewables.com/news/exus-renewables-commissions-53mw-of-wind-assets-in-poland-following-ppa-execution>

119. northdata.de — Portuguese-registry dependency graph for EXUS DIGITAL, UNIPESSOAL LDA (NIPC 518894541)

<https://www.northdata.de/EXUS+DIGITAL%2C+UNIPESSOAL+LDA%2C+Lisboa/518894541> — commercial aggregator of Portuguese commercial-registry data; current links to João Burnay Summavielle (person) and Ed Setúbal Data Lda.; former link chain Freshpanoply Lda. → Nao Victoria Lda. → Exuberant Skills Lda. → Luís Abreu Castello (person) → Eólica do Sincelo SA + Eólica da Linha SA + Next Number — Sociedade de Mediação. **Reliability uncertain; flag as lead, not verified corporate lineage.**

120. Rozporządzenie Ministra Infrastruktury z 12 kwietnia 2002 r. w sprawie warunków technicznych, jakim powinny odpowiadać budynki i ich usytuowanie — consolidated text (Dz.U. 2022 poz. 1225)

<https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20220001225/O/D20221225.pdf> — obwieszczenie Ministra Rozwoju i Technologii z 15 kwietnia 2022 r. announcing the jednolity tekst; cited in §6.8 for the building-permit-stage requirements (§§ 12–14, 28–29, 96, 137, 179–182, 209, 271–273). Amended after 2022 — re-verify values against the current consolidated text before formal use.

121. Written land-purchase offer from BLUENEXT ENERGY Sp. z o.o. to a Domiechowice landowner (August 2026) — private document held by the residents

No public URL — document not published. The offer names BLUENEXT ENERGY Sp. z o.o. as the buying entity; entity identity independently verifiable against KRS 0001204596 / NIP 5214141290 / REGON 543274027 (rejestr.io, krsly.pl). Cited in §2.1, §2.4.3 and the Executive Summary. **TIER D — private document; content consistent with the KRS shareholder record and the press-reported preliminary-agreement stage** ¹⁰².

122. Urząd Gminy Bełchatów — Facebook post opening the "myth-debunking" series: "Myth #1: the Bełchatów Hyperscale Data Center is fake, and the investor is a shell company" (August 2026)
The gmina's own post, produced "together with the investor"; quoted in full in §2.4.8 and in «Belchatow_Mit1_PL.pdf». **TIER A as the gmina's own document (the artefact under analysis); content not reconciled by the gmina against the KRS — see §2.4.8.**

123. Partners Group — H1 2026 results (Baar-Zug, 15 July 2026)
https://www.partnersgroup.com/en/news-and-views/press-releases/corporate-news/detail?news_id=f67a7c5a-4d18-4895-914f-e7182d9d58a7 — AUM **USD 186 bn as of 30.06.2026** (30.06.2025: USD 174 bn); agreement to sell atNorth (pan-Nordic data centre platform); zero mentions of Poland/Bełchatów. Confirms the "over USD 185bn" figure in the "Myth #1" post and, at once, the absence of any public PG commitment to Bełchatów (§2.4.8).

124. eInforma (Portuguese registry-data aggregator) — EXUS DIGITAL, UNIPessoal LDA, NIF 518894541
https://www.einforma.pt/servlet/app/portal/ENTP/prod/ETIQUETA_EMPRESA/nif/518894541/source/search/campaign/fichaemp/ — "Antiguidade: 1 ano(s)"; CAE 71120 (engineering activities); single-member company. Contradicts "active for years in data center development" in the "Myth #1" post (§2.4.8).

125. Raciús — EXUS DIGITAL, UNIPessoal LDA (Portuguese registry aggregator)
<https://www.racius.com/exus-digital-unipessoal-lda/> — share capital **€200**; two capital increases in January 2026.

126. Data Center Dynamics — "500MW data center campus planned for Bełchatów, Poland" (26 February 2026)
<https://www.datacenterdynamics.com/en/news/500mw-data-center-campus-planned-for-be%C5%82chat%C3%B3w-poland/> — "advanced discussions... with a prospective investor"; project "in its early planning stages"; ~50 ha; applications filed 2024. The only trade-press coverage at the time — investor unnamed.

127. mvno-gsm.pl — "Opinia: koniec Next Mobile. Kto next?" (2022)
<https://mvno-gsm.pl/opinia-koniec-next-mobile-kto-next/> — Next Mobile Sp. z o.o. ends all consumer telecom services on 31 May 2022 (Pogoń Mobile, Viva! Mobile); the venture rated a market failure; later pivot to B2B mass-SMS/CPaaS.

128. aleo.com — NEXT MOBILE PROSTA SPÓŁKA AKCYJNA (fmr GLOBITEL P.S.A.), Łódź — FY2024 financial statement
<https://aleo.com/pl/firma/globitell-next-mobile-prosta-spolka-akcyjna> — revenue PLN 49.6M, net profit PLN 2.6M (2024). Scale: a small messaging firm ("a small group of Polish entrepreneurs" — Onet), not a data-centre operator.

129. Renewables Now / Construction Digital — WBS Power: Baltic Data Center Campus, Lublewo (Choczewo commune), 3.2 GW (March 2026)
<https://renewablesnow.com/news/wbs-power-advances-3-2-gw-hyperscale-data-centre-campus-in-poland-1291921/> ; <https://constructiondigital.com/news/polish-hyperscale-data-hub-construction> — 4 × 800 MW; "the largest project of its kind in Poland and one of the largest in Europe" (WBS CEO); grid connection approved, site prep through 2027, first buildings 2028–29. Refutes the "no equivalent in our part of Europe" superlative in the "Myth #1" post (§2.4.8); cf. also Konin 260 MW / €3bn (April 2026) and Hillwood 130 MW.

130. Partners Group — LinkedIn (April 2026): "Exus Renewables — a next generation energy and data center platform"

https://www.linkedin.com/posts/partners-group_exus-renewables-a-next-generation-energy-activity-7444323482152132608-oyNP — "So we built an industry-leading team, Exus Digital, with our expertise in data centers across the Partners Group platform"; PG data-centre exposure: "over USD 4 billion since 2021". PG itself describes Exus Digital as a newly built team — contradicting "active for years" in the "Myth #1" post (§2.4.8).

131. Urząd Gminy Bełchatów — Facebook post "Myth #2": water (August 2026)

The series' second investor co-produced "myth-debunking" post: a promise of $\sim 50 \text{ m}^3$ water/day (= 150–200 homes; less than the Domiechowice–Emilin sołectwo, 220+ homes), water "mainly for workers' sanitary/social needs and maintaining safety systems", "it will not be used for cooling". Quoted in full and analysed in §2.4.9 (PL standalone: «Belchatow_Mit2_PL.pdf»). **TIER A as the gmina's own document (subject of analysis); the 50 m^3 figure appears in no planning document.**

132. LBNL — 2024 United States Data Center Energy Usage Report (Shehabi et al., December 2024)

https://eta-publications.lbl.gov/sites/default/files/2024-12/lbnl-2024-united-states-data-center-energy-usa-ge-report_1.pdf — "After 2023, the average WUE rises slightly, reaching between 0.45 and 0.48 [L/kWh]". US-average benchmark for §3.4 and §2.4.9; at 500 MW IT $\rightarrow \sim 5\,400\text{--}5\,760 \text{ m}^3/\text{day}$.

133. Amazon — "How AWS efficiently uses water in its data centers" (aboutamazon.com, June 2026)

<https://www.aboutamazon.com/news/sustainability/amazon-data-center-water-usage> — AWS fleet WUE **0.12 L/kWh** (2025; 0.19 in 2023): the best published large fleet; at 500 MW IT $\rightarrow \sim 1\,440 \text{ m}^3/\text{day}$.

134. Microsoft — "Sustainable by design: next-generation datacenters consume zero water for cooling" (December 2024)

<https://www.microsoft.com/en-us/microsoft-cloud/blog/2024/12/09/sustainable-by-design-next-generation-datacenters-consume-zero-water-for-cooling/> — waterless DLC cooling ("zero water for cooling") announced December 2024, first deployments ~ 2027 ; fleet WUE FY2024: 0.30 L/kWh; remaining water "for administrative purposes like restrooms and kitchens". Proof that the "Myth #2" pattern is technically real — and that nobody in Bełchatów has committed to it in any document.

135. Meta — "Advancing water stewardship in Meta's data center communities" (about.fb.com, December 2025)

<https://about.fb.com/news/2025/12/advancing-water-stewardship-in-metas-data-center-communities/> — Meta's next-gen campuses: water "limited to domestic and janitorial needs, equipment cleaning, and fire protection" with waterless cooling; language nearly identical to the "Myth #2" post's categories — basis of the marketing-template hypothesis (§2.4.9, unproven).

136. Wody Polskie / gov.pl — "Pobór wód w ramach zwykłego korzystania a wymóg posiadania pozwolenia wodnoprawnego"

<https://www.gov.pl/web/wody-polskie/pobor-wod-w-ramach-zwyklego-korzystania-a-wymog-posiadania-pozwolenia-wodnoprawnego> — ordinary-use exemption capped at $5 \text{ m}^3/\text{day}$ annual average; business abstraction requires a water permit. $50 \text{ m}^3/\text{day} = 10\times$ the threshold (§2.4.9, Q32–Q33).

137. Regulation of the Minister of Interior and Administration (MSWiA) of 24 July 2009 on fire-water supply and fire roads (Dz.U. 2009 no. 124 item 1030)

External fire-water flow requirement $\geq 20 \text{ dm}^3/\text{s}$ ($72 \text{ m}^3/\text{h}$) for buildings $> 5\,000 \text{ m}^3$ (production/warehouse halls more); network deficit $\rightarrow$ tanks at 10 m^3 per $1 \text{ dm}^3/\text{s}$. Basis of the fire-water math in §2.4.9 and Q33 ($\varphi 150 \approx 63.6 \text{ m}^3/\text{h}$ at $1 \text{ m/s} < 72 \text{ m}^3/\text{h}$).

- 138.** GUS / teraz-środowisko.pl — household water use (2023)
<https://www.teraz-srodowisko.pl/aktualnosci/zuzycie-wody-na-mieszkanca-polski-rosnie-15389.html> — 34 400 litres per capita annually $\approx$ 94 L/person/day. Confirms the "150–200 homes" arithmetic in "Myth #2" (the only fully correct computation in the series — §2.4.9).
- 139.** DCD — "Gigawatt-scale data center planned for Choczewo, Poland" (March 2026)
<https://www.datacenterdynamics.com/en/news/gigawatt-scale-data-center-planned-for-chozewo-poland/> — Baltic Data Center Campus (WBS Power), Lublewo, Choczewo commune: **3.2 GW** (4×800 MW), "the largest of its kind in Poland and one of the biggest in Eastern Europe". Complements ref-129; the series preamble's superlative falsified $6.4\times$ (§2.4.9).
- 140.** IUNG-PIB — Agricultural drought monitoring (2025)
 Agricultural drought in 2025 covered 43% of Łódzkie voivodeship gminas. Basis of the drought priority-of-use question (Water Law: population and agriculture before industry) — §2.4.9, Q35.
- 141.** Li P., Yang Y., Islam A., Ren S. — *Making AI Less "Thirsty": Uncovering and Addressing the Water Footprint of AI Models* (arXiv:2304.03271; accepted at Communications of the ACM)
<https://arxiv.org/abs/2304.03271> — In evaporative cooling $\sim 80\%$ of withdrawal evaporates; published per-site on-site consumption $\sim 0\text{--}9$ L/kWh (from Google's annualized average to a commercial Arizona site in summer); Microsoft per-campus WUE table 0.00–1.90. Basis of the §3.4 cooling topology and WUE range (the 0.0–4.4 range in Mytton's review refers to power plants, not data centres).
- 142.** Urząd Gminy Bełchatów — "Myth #3" post: cooling (August 2026)
 Third post in the "myth-busting" series produced "together with the investor": waterless hybrid cooling — closed coolant loop, "passive" free cooling most of the year, "high-efficiency chiller aggregates" in hot spells; without a single design number. Quoted in full in «Belchatow_Mit3_PL.pdf» and analyzed in §2.4.10. **TIER A as the gmina's own document (subject of analysis).**
- 143.** Shenglin — catalog of large dry/adiabatic coolers
<https://shenglin-tech.com/products/960.html> — units 148–921 kW; sound pressure 64–73 dB(A) at 10 m; airflow up to $\sim 352\,000$ m³/h per unit. Basis of the dry-fleet noise class (§2.4.10, Q44).
- 144.** Stefani Heat Exchangers — 44 dry coolers totaling 75 MW (two data centres, Paris and Madrid)
<https://www.stefaniexchangers.com/44-dry-coolers-for-precision-cooling-of-two-large-data-centres/> — real project: OSTRO units ~ 1.7 MW, noise tolerance ± 1 dB(A). Extrapolation: ~ 293 units of the 1.7 MW class for 500 MW of heat (§2.4.10, Q44).
- 145.** Urząd Gminy Bełchatów — "Myth #4" post: electricity (August 2026)
 Fourth post in the "myth-busting" series produced "together with the investor": target connection capacity 500 MW, "approval from PSE" with confirmation of no threat to the system or consumers, a comparison with Elektrownia Bełchatów ("ten times more capacity"), and no impact on household electricity prices. Quoted in full in «Belchatow_Mit4_PL.pdf» and analyzed in §2.4.11. **TIER A as the gmina's own document (subject of analysis).**
- 146.** Act of 10 April 1997 — Energy Law (Prawo energetyczne), Art. 7 (consolidated text, Dz.U. 2026 poz. 43)
<https://lexlege.pl/prawo-energetyczne/art-7/> — application for "the determination of grid connection conditions" (Art. 7(3a)), the conditional obligation to conclude a connection agreement (Art. 7(1) and (11)),

the mandatory system-impact expert study for connections above 1 kV (Art. 7(8e); exemptions only up to 5 MW), the 150-day deadline for groups I–II (Art. 7(8g)(5)), and the connection fee of $\frac{1}{4}$ of actual outlays for the transmission network (Art. 7(8)(1)). Statute text via a mirror service (ISAP blocks automated retrieval). Legal basis of §2.4.11 (C1–C2).

147. PGE GiEK, Elektrownia Bełchatów Branch — installed capacity

<https://elbelchatow.pgegiiek.pl/o-oddziale> — "Moc zainstalowana elektrowni wynosi 5096,7 MW, a osiągalna 5102 MW"; Europe's largest lignite-fired power plant. Basis of the "ten times more capacity" comparison (§2.4.11).

148. PSE — Report on the operation of the PSE (KSE) for 2025, and the record-demand announcement (12 Jan 2026)

<https://www.pse.pl/dane-systemowe/funkcjonowanie-kse/raporty-roczne-z-funkcjonowania-kse-za-rok/raporty-za-rok-2025> ; <https://www.pse.pl/-/rekord-zapotrzebowania-na-m-3> — KSE installed capacity 77 331 MW (31.12.2025); maximum 2025 demand: 27 550 MW; average peak-scenario power reserves: 11 131 MW; national consumption 167 484 GWh; all-time record demand 27.6 GW net (29.2 GW gross) on 9 Jan 2026, met with "an adequate power reserve". Basis of the system-scale analysis (§2.4.11, C3).

149. WysokieNapiecie.pl — 2026 electricity prices: end of the freeze, return to market tariffs (18 Dec 2025)

<https://wysokienapiecie.pl/115767-ceny-pradu-na-2026-ile-lacznie-zaplacimy-kto-odczuje-obnizke/> — from 1.01.2026 tariffs are again "based on actual exchange prices", averaging ~PLN 495/MWh net (G11, the four largest suppliers); the PGE bill at 2000 kWh/year: PLN 205→212/month; supply and distribution each ~half the bill; tariffs approved by the President of URE. Price context (§2.4.11, C4).

150. energetyka24.pl — decision of the President of URE: 2026 capacity-fee rates (4 Nov 2025)

<https://energetyka24.com/elektroenergetyka/wiadomosci/oplata-mocowa-w-gore-rachunki-za-prad-znow-wzrosna> — households: PLN 4.29/10.31/17.18/24.05 per month by consumption band; total capacity-market cost in 2026 (an industry estimate): ~PLN 10 bn (2025: ~6.4 bn). Measure of the socialized cost channel (§2.4.11, C4).

151. Utility Dive — report of the official PJM market monitor on capacity auctions (2 Oct 2025; report 1 Oct 2025)

<https://www.utilitydive.com/news/data-centers-pjm-capacity-auction-market-monitor/801780/> — Monitoring Analytics: data-centre load growth is "the primary reason" for high capacity prices; it lifted auction revenues by USD 7.3 bn (82%) to USD 16.1 bn; the monitor recommends requiring new data centres to supply their own generation. International evidence of the price channel (§2.4.11, C4).

152. IEEFA — Projected data center growth spurs PJM capacity prices increase (2025)

<https://ieefa.org/resources/projected-data-center-growth-spurs-pjm-capacity-prices-factor-10> — PJM capacity prices: USD 28.92/MW-day (2024/25) → USD 329.17/MW-day (2026/27), ~11×. Complements ref-151 (§2.4.11, C4).

153. William Fry — Ireland's data centre connections back online: the DCCOPP3 regime (24 Jun 2026)

<https://www.williamfry.com/knowledge/irelands-data-centre-connections-back-online/> — the new CRU/EirGrid regime from 12 Dec 2025 after the de facto moratorium from late 2021: "Bring Your Own Generation" (own dispatchable generation = 100% of demand), ≥80% of energy from new Irish renewables; data centres = 22% of metered national consumption in 2024, EirGrid median scenario: 31% by 2034. Irish benchmarks (§2.4.11).

154. PSE — "Grid load-shedding stages" (Stopnie zasilania) (2026)

<https://www.pse.pl/jak-funkcjonuje-krajowy-system-elektroenergetyczny/stopnie-zasilania> — curtailments under load-shedding stages 11–20 apply only to entities with contracted capacity ≥ 300 kW ("most homes and apartments have contracted capacity of at most a dozen or so kilowatts"); legal basis: Regulation of the Council of Ministers of 8 Nov 2021 (Dz.U. 2021 poz. 2209, § 6: exemptions incl. hospitals, critical infrastructure). Basis of the analysis of the implied "residents will run out of power" myth (§2.4.11).

155. Greenberg Traurig — Challenges in the Dutch data center market (March 2024)

<https://www.gtlaw.com/en/insights/2024/3/challenges-in-the-dutch-data-center-market> — Amsterdam after its 2019 moratorium (conditionally lifted in 2020): a **670 MVA** cap on new data-centre capacity until 2030 ("controlled growth"), new facilities only on designated industrial land; cf. ref-77, ref-78. Precedent of capping growth (§2.4.11).

156. Microsoft — grid-interactive data centres: UPS in EirGrid's system-services market (7 Jul 2022)

<https://news.microsoft.com/source/features/sustainability/ireland-wind-farm-datacenter-ups/> — Microsoft's Dublin data centre has since 2022 (via the aggregator Enel X) participated in EirGrid's system-services market (DS3): UPS batteries feed power back into the grid at the operator's signal. Evidence that flexibility of large data centres is real (§2.4.11, Q49).

157. FHWA — "Keeping the Noise Down" (Noise Barriers at a Glance, updated 2021)

https://www.fhwa.dot.gov/Environment/noise/noise_barriers/design_construction/keepdown.cfm — the US federal highway agency's official barrier-design primer (TIER B): the line-of-sight breaking condition, 5–10 dB effectiveness, ~ 1.5 dB per metre of height above the sight line, walls usually max ~ 8 m, effectiveness mainly for areas within the first ~ 61 m (200 ft) of a highway, length $\geq 8 \times$ the receiver–barrier distance; vegetation "for psychological relief but not to physically lessen noise levels", 30 m of dense vegetation ≈ 5 dB. Basis of the barrier physics (§2.4.12); the lack of approval for vegetation as attenuation is confirmed by AASHTO: <https://environment.transportation.org/news/noise-abatement-part-2-state-dots-study-new-noise-wall-options/>

158. ISO 9613-2:1996 — Acoustics — Attenuation of sound during propagation outdoors, Part 2: General method of calculation

[https://www.omegawestdocuments.com/media/documents/43/CD43.14%20-%20International%20Standards%20Organisation%20\(1996\).%20ISO%209613-2.%20Acoustics%20%E2%80%93%20Attenuation%20of%20sound%20during%20propagation%20outdoors%20%E2%80%93%20Part%202%20General%20method%20of%20calculation.pdf](https://www.omegawestdocuments.com/media/documents/43/CD43.14%20-%20International%20Standards%20Organisation%20(1996).%20ISO%209613-2.%20Acoustics%20%E2%80%93%20Attenuation%20of%20sound%20during%20propagation%20outdoors%20%E2%80%93%20Part%202%20General%20method%20of%20calculation.pdf) — the environmental-acoustics standard (TIER B): barrier attenuation per equation (14), capped at 20 dB single / 25 dB double diffraction; annex A — dense-forest belt attenuation 2–9 dB/100 m, most effective at high frequencies. Limit confirmation: Power Acoustics, NOISE-CON 2004: https://www.poweracoustics.com/tech%20papers%20pdf/noisecon_2004_paper.pdf — basis of the insertion-loss and 40 dB contour calculations (§2.4.12)

159. NFPA 110 — Standard for Emergency and Standby Power Systems: testing requirements (ch. 8, via an MTU distributor)

<https://www.curtispowersolutions.com/nfpa-110-maintenance-testing> — the standard requires loaded exercise at least monthly for a minimum of 30 minutes at $\geq 30\%$ of standby nameplate kW (TIER B — paragraphs of the standard as quoted by an authorized MTU/Rolls-Royce distributor); conditionally an annual 1.5 h load-bank test at 50%/75% plus a 36-month test. Basis of the genset-fleet test arithmetic: $\sim 3,600$ starts/year at 300 units (§2.4.12)

160. Kohler — Industrial Line Brochure and g5584 datasheet (KD series): 1.25–3.25 MW gensets in sound-attenuated enclosures

<https://ssgen.com/pdfs/kohler-industrial-line-brochure.pdf> ; <https://resources.kohler.com/power/kohler/industrial/pdf/g5584.pdf> — manufacturer data (TIER B), full load at 7 m: 1250–3250 kW units in sound enclosures 75–85 dBA (~72–82 at 10 m [COMPUTED]); the open unit of this class is 98 dB(A) at 7 m. The catalogue ceiling of "state-of-the-art enclosures" for the megawatt class (§2.4.12)

161. Mississippi Today (24 Nov 2025) and The Hill (10 Jun 2026) — xAI Southaven/Memphis: turbine noise and the class action

<https://mississippitoday.org/2025/11/24/southaven-residents-fear-pollution-complain-of-noise-from-elon-musks-xai-data-center-turbines/> ; <https://thehill.com/policy/technology/5918885-spacex-xai-data-center-noise-southaven-lawsuit/> — a continuous gas-turbine rumble audible ~800 m from the installation (Colonial Hills subdivision, journalistic recordings); 8 Jun 2026 — a class action against xAI and SpaceX over "pervasive and inescapable" noise (TIER D). An onsite-power case (continuously running turbines), more extreme than emergency diesel gensets — presented as such (§2.4.12)

162. JLARC (Virginia, 2024) — Data Centers in Virginia (report of the parliamentary audit commission)

<https://jlarc.virginia.gov/landing-2024-data-centers-in-virginia.asp> (report: <https://jlarc.virginia.gov/pdfs/reports/Rpt598.pdf>) — almost 1/3 of Virginia's data centres stand within 200 feet (~61 m) of residentially zoned land; the noise is low-frequency, "not loud enough to damage nearby residents' hearing and rarely loud enough to violate noise ordinances" (TIER A). **Availability caveat:** jlarc.virginia.gov was unreachable from the analysis host; on 27 August 2026 the full Rpt598 report was verified from an Internet Archive snapshot — quotes confirmed against the primary source. Context for "compliance ≠ quiet" (§2.4.12)

163. Urząd Gminy Bełchatów — the "Myth #5" post: noise (August 2026)

Fifth post in the "myth-busting" series produced "together with the investor": acoustic enclosures and silencers, "extensive acoustic screens", a campus surrounded by a "wall" of forest and greenery, and the conclusion that "acoustic analyses show the noise level will not exceed the norms binding for residential areas". Quoted in full in «Belchatow_Mit5_PL.pdf» (Polish) and analyzed in §2.4.12. **TIER A as the gmina's own document (subject of analysis); graphic archived 26 August 2026 (z profilu Gminy Bełchatów na Facebooku), no publication date on the card.**

164. Act of 28 September 1991 on Forests — definition of forest (art. 3), consolidated text Dz.U. 2026 poz. 663 (wording identical in t.j. 2022 poz. 672 and 2024 poz. 530)

<https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20260000663> — compact area ≥ 0.10 ha, forest vegetation (trees and shrubs **and forest undergrowth**) or designation for forest production; basis of the self-seeded-growth assessment in §2.4.13; "de facto forest" case-law line (SN I CSK 258/09) cited via the MODrzew commentary (TIER C)

165. Act of 16 April 2004 on Nature Conservation — art. 83–84 (tree/shrub removal permits, fees, replacement plantings), consolidated text Dz.U. 2026 poz. 13

<https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU2026000013> — art. 83f ust. 1 exemptions: shrub clusters up to 25 m² and trees with trunk girth at 5 cm up to 80 cm (poplars, willows, boxelder/ash-leaved maple and silver maple), 65 cm (horse chestnut, robinia, plane), 50 cm (other species); art. 83b application fields (species, girth at 130 cm, area, location); fee rates: Dz.U. 2017 poz. 1330 (TIER A)

- 166.** Act of 3 February 1995 on the Protection of Agricultural and Forest Land — art. 11–12a (exclusion from production), consolidated text Dz.U. 2024 poz. 82
<https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU2024000082> — closed list of art. 11 ust. 1: mineral soils of classes IV–VI require no decision or fee; the same position invoked in the MPZP resolution's own justification (TIER A)
- 167.** Regulation on the Land and Building Register — § 9 (class Lzr), consolidated text Dz.U. 2024 poz. 219
<https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU2024000219> — "land tree- and shrub-covered within agricultural land" as an agricultural-use class: the formal basis of the "agricultural, not forest" character of plots with self-seeded growth (TIER A)
- 168.** Urząd Gminy Bełchatów — the "Myth #6" post: forests (August 2026)
 Sixth post in the "myth-busting" series produced "together with the investor": land "of agricultural character both in the past and at present", "natural self-seeded trees and shrubs" covered by "a detailed dendrological inventory", "all further actions in accordance with the law and the decisions of the competent authorities". Quoted in full in «Belchatow_Mit6_PL.pdf» (Polish) and analyzed in §2.4.13. **TIER A as the gmina's own document (subject of analysis); graphic archived 27 August 2026 (z profilu Gminy Bełchatów na Facebooku), no publication date on the card; the preamble (superlative, "together with the investor") comes from the post's text above the graphic — the card carries only the series title, "Myth" and "Facts".**
- 169.** PSE — draft *Plan rozwoju w zakresie zaspokojenia obecnego i przyszłego zapotrzebowania na energię elektryczną na lata 2027–2036* (PRSP, Transmission Network Development Plan; main document, post-consultation draft, April 2026)
[https://www.pse.pl/documents/20182/7102190804/PRSP_2027-2036-dokument_glowny_projekt_po_konsultacji.pdf/de2f004f-8a80-4264-907a-a38d52c5d50f?](https://www.pse.pl/documents/20182/7102190804/PRSP_2027-2036-dokument_glowny_projekt_po_konsultacji.pdf/de2f004f-8a80-4264-907a-a38d52c5d50f?safeargs=download=true)
 safeargs=download=true — ch. 4.2.1.3 "Data centres" (*Centra danych*), table 4.3 (SWS weather scenario): 200 MW and 0.6 TWh (2024, per Polish Data Center Association data), 3 093 MW and 17.4 TWh (2036), 5 018 MW and 29.4 TWh (2040); national consumption ~260 TWh and peak demand above 45 GW in 2040 — the source basis of the PSE figures in §2.2, §4.4 and Q51 (TIER A)
- 170.** gramwzielone.pl — P. Rapacka, "Prawdziwych chętnych na centra danych w Polsce jest kilkanaście, nie setki" ("Real contenders for data centres in Poland number a dozen-plus, not hundreds", 24.08.2026)
<https://www.gramwzielone.pl/trendy/20373693/prawdziwych-chetnych-na-centra-danych-w-polsce-jest-kilkanascie-nie-setki> — PSE's written replies to the editors: an application queue of 150–200 GW, connection conditions already issued for data centres totalling more than 6 GW, a dozen-plus real applications after the deposit reform (TIER B — press citing PSE as primary source)
- 171.** strefabiznesu.pl — M. Badowski, "Polska może wygrać wyścig o centra danych. Europa Zachodnia zostaje w tyle" ("Poland can win the data-centre race; Western Europe is left behind", 28.08.2026)
<https://strefabiznesu.pl/polska-moze-wygrac-wyscig-o-centra-danych-europa-zachodnia-zostaje-w-tyle/ar/c3p2-29298775> — interview with M. Borkowski (Polcom): data-centre capacity growing from ~200 MW (2024) to more than 3 GW (2036) and ~5 GW (2040), consumption 17.4 / 29.4 TWh — figures consistent with the PRSP (TIER B)

172. Urząd Gminy Bełchatów — *Informacja międzysesyjna* (inter-session information) for 10.06–10.08.2026 (Environmental Protection and Waste Management Team), item 10: Data Center Bełchatów Sp. z o.o., file ref ZŚ.6220.23.2025

Copy provided to residents in August 2026 — DŚU application of 22.12.2025 (received 23.12.2025), notice of proceeding commencement 05.01.2026, classification as an "undertaking capable of always significantly affecting the environment", Wójt's *postanowienia* of 14.05.2026 (full scope of the OOS report) and 27.05.2026 (suspension pending submission of the report), 71 cadastral plots in the village of Domiechowice (TIER A — the gmina's own document)

173. Planning and Spatial Development Act of 27 March 2003 — art. 21 (plan-preparation costs fall on the gmina budget; art. 21(2) exceptions only for public-purpose investments), art. 2(5) (definition of public-purpose investment — cross-reference to the Real-Estate Management Act catalogue), art. 36(1)(2) (demand for buy-out by the gmina), art. 36(4) read with art. 37(3)–(4) (planning fee up to 30% of the value increase on disposal within 5 years) — consolidated text Dz.U. 2026 poz. 538

<https://lexlege.pl/ustawa-o-planowaniu-i-zagospodarowaniu-przestrzennym/art-21/> — legal basis of §2.4.14 (Flags 1–4 of the «Belchatow_Mit7_PL» card)

174. Real-Estate Management Act of 21 August 1997 — art. 6 (catalogue of public purposes), art. 109 (gmina's pre-emption right for plan-designated public-purpose areas, if disclosed in the land register; art. 109(3)(6) — exclusion for national-road purposes), arts. 145–146 (adjacency fee) — consolidated text Dz.U. 2026 poz. 399

<https://lexlege.pl/ustawa-o-gospodarce-nieruchomosciami/art-109/> — legal basis of §2.4.14

175. Public Roads Act of 21 March 1985 — arts. 19–20 (road managers — for municipal roads the wójt — and their statutory tasks: construction, repair, maintenance, protection) — consolidated text Dz.U. 2025 poz. 889

<https://lexlege.pl/ustawa-o-drogach-publicznych/art-19/> — basis of §2.4.14 (public-road maintenance as the manager's perpetual cost)

176. Bełchatów Municipal Council — Resolution no. XXI/169/2025 of 25 September 2025 on commencing the drafting of the local land-use plan for the economic zone in Domiechowice

<https://ugbelchatow.esesja.pl/posiedzenie/dd9f26ae-c83f-4> — XXI session (proceedings and draft resolution); number and date also confirmed in the MPZP resolution's justification (p. 10) — the start of the planning procedure and of the gmina's costs (TIER A)

177. Urząd Gminy Bełchatów — "Myth #7" post: land, utilities and roads (August 2026)

Seventh post in the "myth-busting" series produced "together with the investor": land private, "a large part of these areas has already been purchased by the investor", "the gmina bears no costs in this connection", "the investor will pay for all activities related to preparing the site". Quoted in full in «Belchatow_Mit7_PL.pdf» (Polish) and analyzed in §2.4.14. **TIER A as the gmina's own document (subject of analysis); graphic archived 28 August 2026 (from the Gmina Bełchatów Facebook profile), no publication date on the card; the preamble (superlative, "together with the investor") comes from the post's text above the graphic — the card carries only the series title, "Myth" and "Facts".**

178. Civil Code of 23 April 1964 — art. 389 (preliminary agreement obliges only to conclude a future contract), art. 158 (transfer of real-estate ownership by notarial deed); Land and Mortgage Register Act of 6 July 1982 — art. 5 (the register's decisive content towards third parties)

<https://lexlege.pl/kc/art-158/> — basis of the "preliminary agreement vs ownership transfer" distinction in

§2.4.14

179. Urząd Gminy Bełchatów — "Myth #8" post: employment (August 2026)

Eighth post in the "myth-busting" series produced "together with the investor": construction "200 to 800 people - depending on the stage", "approx. 250 permanent jobs" once operational (IT engineers, cybersecurity experts, technicians, infrastructure-maintenance specialists, security), multiplier "other businesses will also develop around such a large facility". Quoted in full in «Belchatow_Mit8_PL.pdf» (Polish) and analyzed in §2.4.15. **TIER A as the gmina's own document (subject of analysis); graphic archived 29 August 2026 (from the Gmina Bełchatów Facebook profile), no publication date on the card; the preamble (superlative, "together with the investor") comes from the post's text above the graphic — the card carries only the series title, "Myth" and "Facts".**

180. ddbelchatow.pl — "A giant investment on a world scale" (May 2026) — wójt Konrad Koc: "ultimately around 400 people are to find employment there", construction workforce demand "we count in the thousands", 18 buildings on over 100 ha, construction from mid-2028, first buildings 2029/30 (TIER D) <https://ddbелchatow.pl/wydarzenia/gigantyczna-inwestycja-na-skale-swiatowa-w-woj-lodzki-powstana-setki-miejsc-pracy/BoVhRDcoT5QaQRQkX9Ld> — the gmina's earlier, higher employment declarations; basis of the numerical divergence in §2.4.15

181. JLARC (Virginia, 2019) — *Data Center and Manufacturing Incentives* (report of the parliamentary audit commission)

<https://netchoice.org/wp-content/uploads/2020/07/2019-Virginia-JLARC-report.pdf> — tax-incentive cost of USD 223,125 per data-center job (against USD 4,189 for the average Virginia incentive); "the data center industry is not job-intensive. Instead, it is heavily capital intensive"; $\sim\frac{2}{3}$ of the additional employment comes from capital investment (construction and equipment replacement every 3–5 years), not operations (TIER A)

182. Quartz — data-center employment benchmark roundup (15 May 2026)

<https://qz.com/data-center-jobs-employment-investment-economic-development-051326> — Hamm Institute (Nov 2025): 20–30 jobs per 100 MW for facilities >100 MW; Latitude Media (May 2026): 25–40 operators per 100 MW at the most automated campuses; Meta Lebanon (Indiana): $\sim$ 300 jobs with >4,000 construction; Virginia: 1 job per $\sim$ USD 13 m of investment (TIER B)

183. Meta — Richland Parish Data Center (Louisiana; project page, 2026)

<https://datacenters.atmeta.com/richland-parish-data-center/> — over 2 GW of target compute capacity; 500+ direct jobs (announcement Dec 2024), after expansion 1,000 "operational jobs supported"; 5,000–7,500+ construction workers at peak; comparable operational-employment scale for §2.4.15 (TIER A/D — operator's own material)

184. Des Moines Register — "Google data center jobs in Council Bluffs" (21.10.2022)

<https://www.desmoinesregister.com/story/money/business/2022/10/21/google-data-center-council-bluffs-iowa-jobs-expansion/69578905007/> — 250 direct Google employees against USD 5.5 bn invested by 2022; $\sim$ 900 people "on site" including external supplier roles (servicing, food, security) — the operator-headcount vs with-contractors distinction (TIER B)

185. The New York Times — Karen Weise: "The Electricians Powering the A.I. Boom" (25.12.2024)

<https://www.nytimes.com/2024/12/25/technology/ai-data-centers-electricians.html> — travelling union electrician crews (IBEW) moving between US data-center construction sites (motel housing, six-day weeks); including the Quincy (Washington state) reportage: DC taxes $\approx$ 75% of all city taxes with 4/5 of pupils still eligible for free meals and operating facilities staffed by "several dozen workers" (TIER B)

186. Act of 1 October 2024 on the revenues of local-government units (Dz.U. 2024 poz. 1572) — art. 8: gmina share 7.0% of PIT income of taxpayers resident on its territory, 1.6% of CIT income of taxpayers seated there (state of law on 30.08.2026; until 31.12.2024 the 2003 act applied, art. 4: shares of 39.34% PIT / 6.71% CIT of tax receipts; the new shares apply from budget year 2025 — art. 116)

<https://lexlege.pl/doch-samorz/art-8/> — basis of the fiscal mechanics in §2.4.15: the PIT share attaches to the taxpayer's place of residence — a job in Domiechowice does not mean PIT revenue for Gmina Belchatów if the worker lives elsewhere (TIER A)

187. euronews.pl — Polish data-center market report with Atman/GCI (4 Oct 2025): "the city also has a large international airport – a key factor, because the biggest players do not hire top specialists on site, but fly them in when something breaks"

<https://pl.euronews.com/next/2025/10/04/serwery-w-pomieszczeniach-na-szczotki-coraz-rzadziej-bo-pol-ska-rozpycha-sie-na-rynku-data-> — location and employment context of the Polish DC market (TIER B)

188. Statistics Poland (GUS) — foreign nationals working in Poland by NACE section and citizenship (Q1 2026): construction — 123.2 thousand persons (11% of all working foreigners); Ukrainian citizens — 67.7% of working foreigners; fastest growth: Colombia, Nepal, the Philippines; India — 15.2 thousand work permits (H1 2025)

<https://stat.gov.pl/> — basis of the nationality picture of the construction labour market in §7.1 (TIER A)

189. Hyperscaler operational-recruitment model: Microsoft — data-center role postings (requirement: high-school diploma, employer training; operations roles not visa-sponsored) and the Datacenter Academy programme (including in Polish); Beyond.pl — "data center technician" posting (secondary education; SEP "welcome")

<https://datacenters.microsoft.com/globalservices/> — basis of the local-recruitment thesis for operations in §7.1 (TIER B)

190. LG Energy Solution Wrocław — the Polish "Korean" precedent: over 7 thousand employees of a dozen-plus nationalities; Korean staff as the initial know-how transfer, the daily work done by Polish employees (press reports; ~2.6 thousand South Korean citizens in Poland overall)

Basis of the contrast with the "Korean operations crews" hypothesis in §7.1 (TIER D)

191. Urząd Gminy Belchatów — post "Myth #9": budget and benefits (August 2026)

<https://www.facebook.com/profile.php?id=100064244667139> — subject of verification in §2.4.16; card archived 30.08.2026 in the package source materials (TIER A)

192. Resolution XXIII/195/2025 of the Gmina Belchatów Council (27.11.2025) — property-tax rates for 2026: 31.14 PLN/m² of business buildings, 1.20 PLN/m² of land, 2% of structures (Łódź Voivodeship Official Journal poz. 11306); MF announcement of 1.08.2025 (M.P. 2025 poz. 726) — 2026 maxima: 35.53 PLN/m² / 1.45 PLN/m² / 2%

<https://ugbelchatow.pl> — gmina rates at 83–88% of maxima; basis of the §2.4.16 revenue computations (TIER A)

193. Gmina Belchatów — 2026 budget (communiqué after the 29.12.2025 session): revenues PLN 164,134,048, expenditures PLN 187,200,662 (incl. capital PLN 80,883,234); gmina demography: 12,718 residents (30.06.2025)

<https://ugbelchatow.pl/aktualnosci/> — percentage base for the data-center property-tax revenues in §2.4.16 (TIER A)

194. Loudoun County (Virginia) — "Data Centers in Loudoun County" + FAQ (2026): data centers = 38% of general-fund revenue on 4% of commercial parcels; \$26 of taxes per \$1 of services; local tax on computer equipment \$4.15/\$100; homeowner rates \$1.285 → \$0.805 (2008–2026); official warning of a revenue "plateau" within 5–10 years; board voted 7–2 to restrict further data centers
<https://www.loudoun.gov/6188/Data-Centers-in-Loudoun-County> — the exemplary and cautionary case of benefit distribution in §2.4.16 (TIER A)

195. IW Consult / Detecon — economic studies of the Frankfurt-Rhein-Main data-center industry (commissioned by the City of Frankfurt am Main and partners, 12.2025; 2023 data): industry fiscal effect €405 million/year, of which host municipalities keep ~10% (~€39.1 million, mostly trade tax); federal government + state of Hesse €275 million; FAZ (5.12.2025): "Schlechte Steuerquelle für Kommunen"
<https://www.frankfurt-business.net> — the European counterpoint to "large local revenues" in §2.4.16 (TIER B)

196. The Journal Investigates (1.09.2025) — Ireland: local councils collect an estimated €62.5 million/year in commercial rates from 89 data centers (South Dublin ~1/5 of rate income; Meath ~17%); figures not officially published — journalistic estimate; Friends of the Earth Ireland (5.2026, model by Dr S. Fearon): households overpaid ~€715 million for electricity (2015–2023)
<https://www.thejournal.ie/investigates/data-centre-commercial-rates-6796749-Sep2025/> — the second European local model in §2.4.16 (TIER B/C)

197. Monitoring Analytics (independent PJM monitor, 10.2025 report) — data-center load raised capacity-auction revenues by \$7.3 billion (+82%, to \$16.1 billion): market conditions "almost entirely" the result of large data-center additions; PJM (7.2025): capacity price at the \$329.17/MW-day cap; IEEFA: capacity prices ×10 in two years (\$28.92 → \$329.17); Union of Concerned Scientists: \$4.4 billion of transmission costs borne by ratepayers
<https://www.utilitydive.com/news/data-centers-pjm-capacity-auction-market-monitor/801780/> — the default grid-cost mechanism (ratepayer bills) in §2.4.16 (TIER A/B)

198. Good Jobs First (1.2026, based on the Commonwealth of Virginia FY2025 ACFR) — the state lost \$1.6 billion of sales/use tax revenue to data-center exemptions (+118% y/y); University of Georgia Carl Vinson Institute: 70% of Georgia's data-center projects would have happened without the exemption
<https://goodjobsfirst.org/virginia-tax-revenue-losses-to-data-centers-soar-to-1-6-billion-for-fy25/> — the other side of the tax-incentive ledger in §2.4.16 (TIER B)

199. Business Insider / MDDP Rafał Kran (10.11.2025) — property tax on Polish data centers: taxable are buildings, land and structures (fences, yards, foundations, containers); IT equipment (servers, storage arrays, backup power) outside the taxable object; classification disputes at the structures boundary (transformers)
<https://businessinsider.com.pl/prawo/podatki/podatek-od-serwerow-to-musza-wiedziec-inwestorzy/mkt4np4> — the structural ceiling of Polish revenues in §2.4.16 (TIER B)

200. PAP / DlaHandlu (18.09.2025) + datacentermap — Atman WAW-3 (Duchnice, Ożarów Mazowiecki gmina): PLN 2.5 bn campus, ultimately 43 MW IT and ~19 thousand m² of colocation space (~970 m² gross/MW — the floor-area anchor of §2.4.16 computations); the mayor of Ożarów on property-tax revenues: "at least PLN 70 thousand a year" — arithmetic: ~PLN 1.2–1.5 million/year for the full campus
<https://www.dlahandlu.pl/technologie-i-wyposazenie/nowe-centrum-danych-pod-warszawa-inwestycja-za-2-5-mld-zl,161530.html> — the Polish floor-area precedent and an unverified official figure (TIER B)

201. Energy Law (art. 7(8)(1)): the fee for connecting an installation above 1 kV — one quarter of actual outlays; Planning and Spatial Development Act (consolidated text Dz.U. 2026 poz. 538) — art. 37ed–37i: the "urbanist contract" (investor contributions to the gmina) exclusively under an integrated investment plan or revitalization plan

Legal basis of the "at the investor's cost" assessment in §2.4.16 (TIER A)

202. Data Center Bełchatów project team — invitation to a "cycle of open information meetings" (Facebook, 31 August 2026, 14:47)

The first information meeting organized by the investor (not the gmina): addressed to residents of Domiechowice, Emilin, Zalesna and the streets Grabowa, Myśliwska, Zakątek and Łączna; first duty hour 1 September 2026, 17:00–19:00, CSiR community hall in Emilin (Emilin 21a). The graphic card carries no logo and no date (details only in the post text); copy in the source materials included in the package. Basis of the event described in §2.4.17 (TIER D — investor-side page post)

203. Uptime Institute — "AI and cooling: methods and capacities" (February 2025)

Industry analysis of AI-workload cooling: typical immersion vats $\sim 3 \times 1.5 \times 1.5$ m and above 150 kW; immersion in AI "has yet to see uptake"; commercial availability of two-phase systems "significantly declined" after 3M's decision to stop PFAS production. Source of the vat-geometry indicator in §2.4.17 (TIER B)

<https://intelligence.uptimeinstitute.com/resource/ai-and-cooling-methods-and-capacities>

204. Riot Platforms — Corsicana complex, Texas (2024–)

The largest known single-site immersion deployment in the world: 400 MW for Bitcoin mining (single-phase; supplier Midas Immersion), up to 1 GW of total approved capacity — confirmed in operator materials and SEC reporting (supplier: Midas Immersion, base order 200 MW). The scale reference point in §2.4.17: a 500 MW immersion AI campus would be $\sim 1.25 \times$ this and the first in AI (TIER A — operator/SEC)

<https://www.riotplatforms.com/locations/corsicana/>

<https://www.sec.gov/Archives/edgar/data/1167419/000155837025000282/riot-20250121xex99d1.htm>

<https://www.prnewswire.com/news-releases/midas-immersion-cooling-to-supply-200-mw-of-leading-edge-immersion-cooling-equipment-solutions-to-riot-platforms-inc-301880312.html>

205. NVIDIA — "Blackwell platform water efficiency: liquid cooling in AI factories" (blog, April 2025)

The reference AI server platform GB200/GB300 NVL72 (~ 120 kW/rack) uses direct-to-chip cold plates with a CDU exchanger — not immersion; overview of heat-rejection methods: dry coolers ("don't rely on water") vs evaporative ("millions of gallons of water per megawatt annually"). Basis of the D2C description in §3.2 and §2.4.17 (TIER A — manufacturer)

<https://blogs.nvidia.com/blog/blackwell-platform-water-efficiency-liquid-cooling-data-centers-ai-factories/>

206. Google Cloud — "Enabling 1 MW IT racks and liquid cooling" (OCP EMEA Summit, April 2025)

Google liquid-cools at 1 GW scale — more than 2,000 TPU pods on cold plates since 2018 (TPU v3), at $\sim 99.999\%$ availability; the largest known liquid-cooling fleet in the world runs on D2C, not immersion. Basis of §2.4.17 and the §3.2 guide (TIER A — operator)

<https://cloud.google.com/blog/topics/systems/enabling-1-mw-it-racks-and-liquid-cooling-at-ocp-emea-summit>

207. Nature — Alissa et al. (Microsoft), "Using life cycle assessment to drive innovation for sustainable cool clouds" (30 April 2025)

Independent LCA of data-center cooling (cold plates and immersion vs air, full life cycle): energy demand –15–20% and water consumption –31–52%; two-phase fluids "are PFAS, which face legislative restrictions"; single-phase fluids usually hydrocarbon-based. Source of the independent (non-vendor) benefit numbers in §2.4.17 (TIER A — peer-reviewed)

<https://www.nature.com/articles/s41586-025-08832-3>

208. DCX Polska (Warsaw) — immersion systems and "1 MW Optimized Dry Cooler" catalog (as of September 2026)

Polish manufacturer of the full immersion architecture + dry coolers: one unit rejects 1.236 MW at 35°C ambient for 60/40°C fluid (12 fans, 32.4 kW draw) — basis of the ~445-cooler fleet computation for ~550 MW of heat in §2.4.17; ThermaSafe R fluid (PAO, flash point 160°C). Evidence that the "immersion + dry loop" architecture is catalog-available in Poland (TIER D — manufacturer catalog)

<https://dcx.eu/liquidcooling-optimized-drycoolers/1mw-optimized-drycooler/>

<https://dcx.eu/engineered-fluids/thermasafe-r/>

209. Forum Energii — "Heat from the internet. Waste heat from data centers for Polish cities" (17 December 2024)

Analysis of heat-reuse potential: 1 MWe of data center $\approx$ 1 MWt for a municipal network; 40–50 MWe covers ~75% of the heat demand of a 30,000-resident town; direct/chip and immersion coolant at 52–60°C enables near-direct transfer to the network; recommendation of a statutory reuse obligation (e.g. min. 20%); Espoo example (Fortum+Microsoft): 40% of the network's annual demand. Basis of §2.4.17 (heat) (TIER C — think tank with PLDCA)

<https://www.forum-energii.eu/cieplo-z-internetu>

210. City of Belchatów — "Letter of intent on heat for the city signed" (11 April 2025)

The city of Belchatów and PGE Energia Ciepła signed a letter of intent on a new heat source: Belchatów Power Plant shutdown planned for 2035–2036; the city's annual heat demand — 100 MW; sources considered: gas, heat pumps, electrode boilers, biomass. Context of campus heat reuse in §2.4.17 (TIER A — city hall)

<https://belchatow.pl/list-intencyjny-w-sprawie-ciepła-dla-miasta-podpisany/>

211. 3M — "3M to Exit PFAS Manufacturing by the End of 2025" (20 December 2022)

3M's official announcement of exiting all PFAS manufacturing by the end of 2025 — including Novec fluids, the basis of two-phase immersion cooling; context of the EU PFAS restriction under REACH (final ECHA consultation 26.03–25.05.2026, opinion expected in late 2026 — see ref-214). Basis of the PFAS thread in §2.4.17 (TIER A — official announcement)

<https://news.3m.com/2022-12-20-3M-to-Exit-PFAS-Manufacturing-by-the-End-of-2025>

212. C&EN (American Chemical Society) — "Data centers take the plunge" (August 2025)

Review of the liquid-cooling market: ~USD 2 billion in annual sales, forecast USD 7 billion by 2030; Dell'Oro: direct-to-chip holds 80–90% of the market; NVIDIA (March 2024, Blackwell) as the watershed moment for D2C; Vertiv/Honeywell quotes on industry caution toward immersion; single-phase fluids are hydrocarbons (PAO, esters), flash point >200°C in some cases. Basis of market shares and serviceability barriers in §2.4.17 and §3.2 (TIER C — ACS magazine)

<https://cen.acs.org/business/Data-centers-take-plunge/103/web/2025/08>

213. Industry indicators: transformer oil and the dielectric-fluid market (2025–2026)

A 100 MVA transformer holds ~28,000–35,000 L (~30 m³) of insulating oil; cooling classes per IEC 60076 (incl. ONAN/ONAF/OFAP/ODAF); dielectric-fluid market: volume indicator 10–15 L/kW of IT power and prices of 3–12 USD/L. Basis of the "30–160× more fluid per unit of power" comparison and the fluid-cost computation in §2.4.17 (TIER C/D — catalog guides and a market report)

<https://electronics.alibaba.com/buyingguides/80-mva-oil-transformer-guide-what-buyers-actually-need> ·

<https://taishantransformer.com/power-transformer-cooling-methods-onan-onaf-ofaf/> ·

<https://www.strategicmarketresearch.com/market-report/data-center-dielectric-fluid-market> ·

<https://alliancechemical.com/blogs/articles/direct-to-chip-vs-immersion-cooling-fluid-types> **214.** White & Case — "Europe's PFAS restriction proposal moving forward" (26 March 2026) + ECHA process status as of September 2026

215. Wisconsin Public Radio (Evan Casey) — "Microsoft says new technology will save water at Mount Pleasant data center development" (11 December 2024) — Microsoft's declarations: closed loop, ~91M liters saved per facility per year, ~350k gallons/day peak (May–September)

216. Milwaukee Journal Sentinel / WPR / Wisconsin Examiner (September 2025) — figures disclosed after Midwest Environmental Advocates' lawsuit for access to City of Racine records: 2.8M gallons of Lake Michigan water in 2026, up to 8.4M gallons per year for the campus's first phase

217. Wisconsin Watch (19 March 2026) — fact-check of the "four Olympic swimming pools" comparison: false — projected annual water use is several times higher

Law-firm alert opening the final ECHA consultation (26.03.2026); consultation closed 25.05.2026, ECHA opinion expected in late 2026. Basis of the PFAS procedural status in §2.4.17 (TIER C — law firm)

<https://www.whitecase.com/insight-alert/europes-pfas-restriction-proposal-moving-forward>

End of report. Every claim carries a [TIER X — URL or §] citation; [COMPUTED - UNVERIFIED ...] labels are preserved verbatim on the carbon and water arithmetic. Polish terms are given in parentheses on first use. Where the evidence base is silent (the identity of the sole quota-holder of EXUS DIGITAL, UNIPESOAL LDA behind the Portuguese paid Portal da Justiça extract; specific dB-by-boundary data for AI-class DCs; full text of RDOŚ and PPIS scoping letters; the operating-vs-shell characterisation of the smaller EP/EW GREENFIELD/GPM/GPO/GPT affiliates in the NEXT/GLOBITEL network) the text says so explicitly rather than filling the gap by assumption.**