

A SUMMARY OF COMMENTS MADE IN THE COURSE OF PUBLIC CONSULTATIONS FOR THE IV REPORT ON THE IMPLEMENTATION OF THE PROVISIONS OF THE EUROPEAN CHARTER FOR REGIONAL OR MINORITY LANGUAGES BY THE REPUBLIC OF POLAND	COMMENT BY THE MIA
A REPRESENTATIVE OF THE SLOVAK MINORITY IN THE JOINT COMMISSION OF GOVERNMENT AND NATIONAL AND ETHNIC MINORITIES	
<p>1/ Statements that "...the choice of the provisions of the European Charter for Regional or Minority Languages that Poland decided to apply with regard to minority languages and the regional language was an ambitious one. Indeed, Poland undertook to implement the same measures with respect to all languages, with only one Signatory State selecting more languages than Poland (the Republic of Romania – 20 languages). While most States declared several languages, Poland chose as many as 15..." are incomprehensible, for the forms of protection have already been chosen, the <i>European Charter for Regional or Minority Languages</i> was adopted by the Council of Europe in 1992 and ratified by the Government of the Republic of Poland only in 2008, after 17 years. The Government of the Republic of Poland made the decision to ratify the Charter with full awareness, and complaining about the number of languages subject to protection cannot take place now. The same applies to the statements made in the introduction that "...reaching full implementation of all its provisions is difficult...", and "...the Polish government constantly undertakes actions aimed at increasing the presence of minority languages and the regional language in the public space...", for in 2017-2021 the government systematically reduced the amount of funding for entities which implement actions arising from the <i>European Charter...</i>, complicated and bureaucratised the procedures and failed to take the inflation or GDP growth rates when granting subsidies.</p>	The author's point of view
<p>2/ In the comments submitted by the representative of the Slovak community in the Joint Commission of Government and National and Ethnic Minorities to the <i>III Report to the Secretary General of the Council of Europe on the implementation by the Republic of Poland of the provisions of the European Charter for Regional or Minority Languages</i>, the authority competent for matters of national and ethnic minorities states that "...the local government may allocate a</p>	The author's point of view

<p>part of this subsidy to the construction of a sports ground, improvement of the school standard etc. – the targets associated with generally understood education, not only directly with the students or a given school. Therefore, the amounts specified are true, although it is not equivalent to the spending of the entire amounts listed on e.g. employing teachers of the mother tongue...", furthermore, the authors of the Sejm publication <i>Mniejszości narodowe, etniczne i językowe III Rzeczypospolitej Informator 2020</i> (National, ethnic and language minorities in the III Polish Republic, a guide book) Beata Machul-Telus (the Secretary of the Polish Sejm's Commission for National and Ethnic Minorities) and Lech M. Nijakowski (a Standing Advisor to the Polish Sejm's Commission for National and Ethnic Minorities) write about additional funds for minorities, not about basic funds which should be allocated to the funding of the targets listed in response to the comments submitted by the authority competent for national minorities - i.e. "the construction of a sports ground, improvement of the school standard," - as the implementation of those targets is funded from the basic subsidy. Therefore, we state once more that the Slovak minority does not receive such funds, and that the data provided and shown in the draft of the <i>IV Report...</i> for the years 2017-2021 are not true.</p>	
<p>3/ As regards the recommendation arising from Point Re 27 regarding teaching of the Slovak language, no actions have been taken to date pursuant to the recommendation; the teaching still involves only the language without elements of the culture or teaching activities associated with presenting the culture of the country of origin. No educational trips to the country with which the Slovak national minority identifies itself, as announced by the Minister of Education, have taken place, and if any such trips were organised, they involved only students of the Polish nationality who visited Polish memorial sites. Launched in 2015, the contest titled <i>Wspieranie inicjatyw edukacyjnych realizowanych na rzecz uchodźców oraz mniejszości narodowych/etnicznych mieszkających w Polsce, służących kultywowaniu języka, tradycji i kultury kraju pochodzenia lub nauczaniu języka polskiego</i> (Supporting educational initiatives for refugees, national/ethnic minorities living in Poland to cultivate the language, tradition and culture of the country of origin or teach Polish) was changed to a competitive bid for the implementation of a public task titled <i>Wspieranie inicjatyw edukacyjnych w szkolnym środowisku wielokulturowym</i> (Supporting educational initiatives in a multicultural school environment), which led to a change in the approach by the assessing commissions to the disadvantage of speakers of minority languages. As a result of those actions, national minority associations were effectively eliminated from the the group of entities to which the support is granted. This is clearly confirmed by the clarifications contained in a letter by M. Kopeć, Under Secretary of State in the Ministry of National Education. In the period covered by the report, organisation of educational trips to Slovakia received support only in 2018 and it was the amount of PLN 11,000.</p>	<p>The author's point of view</p>

<p>4/ As regards the recommendation arising from Point Re 28 regarding the teaching of the Slovak language, no actions have been taken to date pursuant to that recommendation. The Polish authorities have not implemented any other actions that would "... gradually lead to the development of education in regional or minority languages in practice.". The teaching still does not start at the preschool level, taking into account <i>inter alia</i> the importance of very young age in the language learning process. Furthermore, a the comment by the Expert Committee that "...this level is not covered by the education subsidy..." has been completely ignored - no actions have been taken in this respect, no educational materials have been developed, no teachers have been trained and no dialogue or cooperation has been established with Slovak speakers.</p>	<p>The author's point of view</p>
<p>5/ As regards the recommendations arising from Point Re 30, 31, 32, 33 regarding the teaching of the Slovak language, no actions have been taken to date pursuant to those recommendations. Since the Polish authorities have not implemented any control systems, the existing..."commendable system of subsidies for regional or minority language education..." has not been subjected to checks. Furthermore, the authors of the draft of the <i>IV Report...</i> failed to provide a detailed settlement of the <i>additional funds</i> which were allegedly transferred to the teaching of specific minority languages. In the said summary, they argue that "additional" amounts were transferred but fail to specify those amounts. On the other hand, they confirm an important issue that they transfer the additional funds to local governments, which transpired from Table 10 <i>Amount of additional annual educational subsidy for students from national and ethnic minorities and the community speaking a regional language in 2010-2021</i>, which, for reasons unknown, includes also data for the years 2010-2016, although the report covers the period of 2017-2021. The claim that such large amounts are spent on teaching the Slovak language is untrue. It is surely for this reason that there were included in the summary, so that the reader could not read and understand them properly.</p>	<p>The author's point of view</p>
<p>6/ As regards the recommendation arising from Point Re 34 regarding the teaching of the Slovak language, no actions have been taken to date pursuant to that recommendation. The Ministry of Education and Science has failed to take any actions for training and further training of teachers who are necessary to ensure a high quality of teaching of regional or minority languages, including Slovak. Due to the of teachers, the teaching of Slovak at School No. 4 in Lipnica Wielka, the Municipality of Lipnica Wielka, was discontinued in 2021/2022, and the responsible school administration failed to take any actions to ensure such education. Motions submitted by parents in that town as regards teaching of the Slovak language were ignored. The Ministry of Education and Science failed to implement the recommendation of the Committee of Ministers from the previous monitoring cycle, and not only did it fail to provide updated textbooks for teaching of the Slovak language which would meet the new curriculum,</p>	<p>The author's point of view</p>

<p>but it also failed to take any steps to prepare such textbooks. On the other hand, the Ministry rejected an offer made by the Association of Slovaks in Poland which offered the intention to prepare such textbooks. The Ministry rejected that offer despite the appeal by MP Danuta Pietraszewska, the then head of the Polish Sejm's Commission for National and Ethnic Minorities.</p> <p>7/ As regards the recommendation arising from Point Re 35 regarding the teaching of the Slovak language, no sufficient actions have been taken pursuant to that recommendation. The Ministry of Education and Science has failed provide any new Slovak language textbook that would meet the current curriculum. It even went as far as to refuse to cooperate with speakers of that language during the meeting of the Polish Sejm's Commission for National and Ethnic Minorities on 20 June 2017.</p>	
<p>8/ As regards the recommendation arising from Point Re 36 regarding the teaching of the Slovak language, no actions have been taken pursuant to that recommendation. The Ministry of Education and Science has failed to ensure or introduce any training for teachers teaching in regional or minority languages required under the ratified commitments (Article 8(1)(h)). There are no indications that the situation will change in the coming years.</p>	The author's point of view
<p>9/ As regards the recommendation arising from Point Re 38 regarding the teaching of the Slovak language, no actions have been taken pursuant to that recommendation. The Ministry of Education and Science has failed to ensure or introduce any further training or methodological consultancy for teachers of the Slovak language. There are no indications that the situation will change in the coming years.</p>	The author's point of view
<p>10/ As regards the recommendation arising from Point Re 39 regarding the teaching of the Slovak language, no actions have been taken pursuant to that recommendation. The Ministry of Education and Science, with respect to the teaching of history and culture of the Slovak minority (commitment 8(1)(g)), not only failed to provide an adequate textbook to teach the "history and culture" as part of teaching of the Slovak language, but it also failed to take any steps to the history, geography or culture of the "students' home country" associated with a given language.</p>	The author's point of view
<p>11/ As regards also the recommendation arising from Point Re 40 regarding the teaching of the Slovak language, no actions have been taken pursuant to that recommendation. The Ministry of Education and Science, in the area of monitoring the teaching of regional and minority languages, has failed to meet commitment 8(1)(i), as the mechanisms in place today do not meet the requirements of the commitment assumed.</p>	The author's point of view
<p>12/ As regards the recommendation arising from Point Re 41 regarding the teaching of the Slovak language, no actions have been taken pursuant to that recommendation. Ministry of Education and Science has failed to finance (or support) any language course organised by the Association of Slovaks in Poland, and even failed to advise national or ethnic minority</p>	The author's point of view

associations that such support could be granted. What is more, activities of the ASP in that respect were belittled.	
13/ As regards the recommendation arising from Point Re 42 regarding the Slovak language, no actions have been taken pursuant to that recommendation. The public authorities have failed to take any actions regarding the reduction, as suggested by the Committee of Ministers, in the application of the 20% threshold to the commitments set forth in Article 10, and has failed to even embark on creating the legal possibility of submitting oral or written applications in the regional or minority languages also in relation to districts and voivodships.	The author's point of view
14/ As regards the recommendation arising from Point Re 49 - strengthening the offer of broadcasting in all regional or minority languages - the recommendation has been implemented only partially with respect to the Slovak language; no broader actions have been taken pursuant to the recommendation in question. An opportunity to broadcast a weekly 25-minute radio programme in Slovak (Sundays at 22:05) titled <i>Prameň</i> , but it was discontinued due to the low wage paid to the editor (PLN 800 gross), which prevented and still prevents recruiting permanent personnel.	The author's point of view
15/ As regards the recommendation arising from Point Re 50 - Poland has undertaken to facilitate the creation of one public radio station and one public television channel in each regional or minority language - this commitment has not been met with respect to the Slovak language; it was implemented only partially and for a very short period of time, which is mentioned above.	The author's point of view
16/ As regards the recommendation arising from Point Re 53, no actions have been taken with respect to the Slovak language that would meet the commitment arising from Article 11(1)(f)(ii) of the <i>European Charter...</i> ; no financial aid has been granted to any audio-visual producers in Poland which could develop their own productions in regional or minority languages.	The author's point of view
17/ As regards the recommendation arising from Point Re 55 that the Polish authorities "shall support training of journalists and other staff for media using regional or minority languages", it must be said that, as regards the Slovak language, no training has been organised for journalists or other media workers who use the Slovak language.	The author's point of view
18/ As regards the recommendation arising from Point Re 56, it must be said that no representative of Slovak speakers has ever held a seat in any radio or television programme councils, and that no proposition in this respect made by the Association of Slovaks in Poland has	The author's point of view

ever been answered. However, this does not apply to the present period, as due to the fact that the said propositions have been completely ignored, they are no longer repeated. It must also be highlighted that, as regards the commitment arising from Article 11(3), no actions have been taken with respect to the Slovak language "...ensure that the interests of the users of Slovak are represented or taken into account within bodies guaranteeing the freedom and pluralism of the media".	
19/ As regards the recommendation arising from Point Re 57, a number of actions have been taken with respect to the Slovak language which have been supported by the Ministry of the Interior and Administration, with nearly non-noticeable support from 2 of the 7 municipalities. Furthermore, it should be noted that the amount of support has decreased for virtually every project, which reflects a very negative trend observed in 2017–2021.	The author's point of view
20/ As regards the recommendations arising from Point Re 58 the Polish Authorities should "...arrange for the functioning of cultural institutions in close co-operation with the regional or minority language speakers....," it must be said that the aforementioned recommendation of the Expert Committee has not been implemented with respect to the Slovak language.	The author's point of view
21/ As regards the recommendation set forth in Point Re 63, it must be said that in 2017–2021 no action has been taken that would involve "...promotion of regional or minority languages in a wide range of social and economic activities carried out by enterprises under public control such as railway, urban transport, electricity, water and gas, refuse collection and disposal".	The author's point of view
22/ As regards the recommendations set forth in Point Re 64, hardly any actions have been taken with respect to the Slovak language that would meet the commitments arising from Article 14(a) and (b) of the <i>European Charter</i> ...	The author's point of view
23/ As regards actions listed on pages 63-98 of the draft of the <i>IV Report</i> ..., it must be said that they do not concern actions for the benefit of users of the languages listed in the <i>European Charter</i> ... but are haphazard actions taken by various Polish state institutions.	The author's point of view
A REPRESENTATIVE OF THE FOUNDATION FOR THE GERMAN MINORITY OF THE ŚLĄSKIE VOIVODESHIP IN RYBNIK	COMMENT BY THE MIA
1/ the report should be supplemented by the addition of a clear list of organisations which apply for minority funding.	Due to the technical design of the report (number of pages), the comment was rejected. Nevertheless, lists of organisations which apply for the funding, including the amounts of subsidies granted (or lack thereof) are of public character and are published every year at https://www.gov.pl/web/mniejszosci-narodowe-i-etniczne/dotacje2

