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Written Third Party Submissions on behalf of the Association Human Constanta International in *C.O.C.G. and Others v. Lithuania* (Application no. 17764/22) dated 26 September 2024

Pursuant to the Deputy Grand Chamber Registrar's notification dated 13 September 2024 that the President of the Grand Chamber had granted permission under Rule 44 § 3 of the Rules of the European Court of Human Rights

Introduction

1. This written submission is provided by the Association Human Constanta International (Human Constanta) pursuant to the leave granted by the President of the Grand Chamber to intervene as a third party in the Court's proceedings, in accordance with Rule 44 § 3 of the Court. Through this brief, Human Constanta aims to assist the Court by providing an evidence-based analysis on the issues raised by the Court regarding the asylum system in Belarus (Part I) and its compliance with the principle of non-refoulement (Part II). Additionally, it addresses the means of legal entry into Lithuania from Belarus through official border checkpoints (Part III), as well as the treatment of migrants by Belarusian border guards in border regions, based on testimonies collected by Human Constanta in Belarus (Part IV).
2. In the spring of 2021, Belarus initiated a humanitarian crisis¹ along its border with neighbouring European Union countries. Tens of thousands of third-country nationals arrived, and continue to arrive, in Belarus, both individually and in groups, attempting to cross into the EU to seek international protection in one of its Member States. This situation is one of the many consequences of the severe crackdown on human rights and the escalating political crisis in Belarus, following the rigged 2020 presidential elections.² Human Constanta has also observed and documented a sharp deterioration in the overall situation concerning the rights of foreigners and stateless people in Belarus.³

¹ *Humanitarian Crisis in Belarus and at the border with the EU, June 2021-February 2022*, Human Constanta Report, <https://humanconstanta.org/humanitarian-crisis-en-2021-2022/>.

² A/HRC/47/49: Report of the Special Rapporteur on the Situation of Human Rights in Belarus, Anais Marin, 4 May 2021, [ohchr.org/en/documents/country-reports/ahrc4749-report-special-rapporteur-situation-human-rights-belarus-anais](https://www.ohchr.org/en/documents/country-reports/ahrc4749-report-special-rapporteur-situation-human-rights-belarus-anais).

³ *Foreign citizen's rights in Belarus after August 2020*, Human Constanta Report, 18 January 2021, <https://humanconstanta.org/en/foreign-citizens-rights-in-belarus-after-august-2020/>.

Part I. The effectiveness of the asylum system in Belarus

3. In 2008, Belarus adopted the Law "On Granting Refugee Status, Additional Protection, Asylum, and Temporary Protection to Foreign Citizens and Stateless Persons in the Republic of Belarus," along with a series of legal acts regulating the procedure for international protection. Although Belarus is a party to the 1951 UN Convention Relating to the Status of Refugees and its 1967 Protocol, and its national legislation generally aligns with international standards, the country has yet to establish an effective mechanism for providing international protection. The current system in Belarus is complex, non-transparent, and lacks a presumption of trust toward applicants. It is often unclear to those seeking protection, particularly individuals who do not speak Russian or English. Applicants frequently encounter unprofessional behaviour from immigration officers at the local level, discrimination, and an overall lack of political will to develop an effective asylum system.⁴
4. The average percentage of positive decisions on granting international protection in Belarus remains quite low, with the exception of Ukrainian citizens, who are granted additional protection for one year. According to official statistics from the Ministry of Internal Affairs of Belarus, a total of 10,959 people applied for asylum between 2009 and 2023.⁵ During this period, refugee status was granted to only 211 individuals. Additional protection was provided to 7,438 people, the majority of whom (6,978) were Ukrainian citizens.⁶ These statistics suggest that the Belarusian asylum system discriminates against certain nationalities. For instance, citizens of countries such as Egypt and Yemen typically receive only additional protection. Moreover, there have been cases where the authorities refused to grant refugee status and ordered the expulsion of citizens from Afghanistan, Iran, and Syria, despite ongoing armed conflicts in these countries. Meanwhile, citizens from Cuba, Ghana, Somalia, Sri Lanka, Sudan, Uzbekistan, and other nations where gross human rights violations occur have not received any form of protection in Belarus.
5. In Belarus, asylum seekers face several significant challenges. Firstly, there is a lack of access to asylum procedures. Foreigners entering the country irregularly are subject to apprehension. Once detained, they often lack a real opportunity to apply for asylum due to limited access to information about the procedure. This is further complicated by the absence of interpreters and legal representation, and detainees are not automatically provided with information in a language they understand. Legal assistance in Belarus is exclusively provided by licensed lawyers. While individuals detained in criminal cases have the right to a lawyer, with costs covered by the state if they cannot afford it, asylum seekers detained for immigration violations fall under administrative proceedings. Belarusian law does not provide for the appointment of a lawyer in such cases. For administrative offences, a detained foreigner is required to contact a lawyer at the place of detention to sign a legal assistance contract or grant power of attorney, allowing the lawyer to represent them. At the same time, lawyers

⁴ *Humanitarian Crisis in Belarus and at the border with the EU, June 2021-February 2022*, Human Constanta Report, <https://humanconstantia.org/humanitarian-crisis-en-2021-2022/>.

⁵ The Ministry of Internal Affairs of the Republic of Belarus webpage: <https://www.mvd.gov.by/ru/page/departament-po-grazhdanstvu-i-migraci/migraciya/statistika-po-migracii>.

⁶ *Id.*

cannot enter an administrative detention facility without prior authorization.⁷ As a result, if the detained foreigner has no contacts in Belarus to arrange a contract with a lawyer on their behalf, access to legal assistance becomes nearly impossible.

6. In Belarus, there are no separate detention facilities for foreign citizens and stateless individuals who violate migration laws or are subject to forced expulsion or deportation. They are held in temporary detention facilities, which are not designed for long-term detention. Foreigners who have applied for asylum in Belarus are also held in these facilities, often for extended periods. Given the conditions in such facilities, these measures may be classified as inhumane and degrading treatment.⁸ Detainees receive irregular outdoor time and are often denied showers despite repeated requests. Respondents interviewed by Human Constanta reported poor food quality and unsanitary conditions. They also noted that bed linens, soap, and toilet paper were not provided in a timely manner. At no point during their detention were the rights and obligations of the detainees explained to them.⁹
7. Between 2021 and 2022, the Human Constanta team collected 172 short surveys and 3 in-depth interviews with migrants who arrived in Belarus in the course of the ongoing humanitarian crisis. Interviewed foreigners confirmed that several international protection applications submitted by them were unjustifiably denied, while other migrants were simply intimidated by immigration officers and prevented from applying for asylum in Belarus. Some migrants were scared to submit their asylum applications in person due to their irregular migration status and as immigration offices in Belarus are part of the law enforcement agencies and frequently practise immigration detention.¹⁰ Belarusian authorities have made the unjustified detention, expulsion, and deportation of people attempting to seek asylum a routine practice.¹¹ Additionally, the U.S. Department of State's 2023 Trafficking in Persons Report: Belarus notes that some of these migrants were returned to their countries of origin without being screened for trafficking.¹²
8. It should be also noted that migrants arriving in Belarus as part of the humanitarian crisis are predominantly ignored by the Belarusian authorities. Other options of help or even legal consultation inside the country are limited. Since 2020, the Belarusian

⁷2022 Humanitarian Crisis in Belarus and at the border with the European Union, Human Constanta Report, https://humanconstanta.org/wp-content/uploads/2023/03/2022-Humanitarian-crisis-in-Belarus-and-at-the-border-with-the-EU_report.pdf.

⁸ NGOs report on compliance by the Republic of Belarus with the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, 2018, https://spring96.org/files/book/en/cat_ngo_belarus_2018_en.pdf.

⁹ Analytical report on what may happen to foreign citizens apprehended in Belarus, Human Constanta, 2017, https://humanconstanta.org/wp-content/uploads/2018/10/ce31b5_6baf3e3946b749c289a079753c56daf8-2.pdf.

¹⁰2022 Humanitarian Crisis in Belarus and at the border with the European Union, Human Constanta Report, https://humanconstanta.org/wp-content/uploads/2023/03/2022-Humanitarian-crisis-in-Belarus-and-at-the-border-with-the-EU_report.pdf.

¹¹Belarus/EU: New evidence of brutal violence from Belarusian forces against asylum seekers and migrants facing pushbacks from the EU, Amnesty International, 20 December 2021, <https://www.amnesty.org/en/latest/news/2021/12/belarus-eu-new-evidence-of-brutal-violence-from-belarusian-forces-against-asylum-seekers-and-migrants-facing-pushbacks-from-the-eu/>.

¹² 2023 Trafficking in Persons Report: Belarus, US Department of State, <https://www.state.gov/reports/2023-trafficking-in-persons-report/belarus>.

authorities have been conducting a campaign to liquidate non-profit organisations as part of the political persecution of those who disagreed with the results of the fraudulent presidential elections and the violence against peaceful protesters. As of the end of July 2024, this amounts to at least 1,086 NGOs.¹³ The dissolution of civil society organisations such as Human Constanta (liquidated in 2021) has led to a significant decrease of people who are able to help migrants and refugees on the ground, and has also meant that such organisations can no longer communicate with authorities to, for instance, make requests about the latest official statistics or represent refugees in front of state bodies. Moreover, in January 2021, criminal liability for acting on behalf of unregistered groups was reintroduced into the Criminal Code of Belarus, now punishable by up to two years of imprisonment.¹⁴ As a result, volunteering in a personal capacity and assisting migrants in any form can serve as a basis for prosecution.

Part II. Multiple violations of the principle of non-refoulement in Belarus

9. Belarus continues to engage in forced expulsions, deportations, returns and extraditions to third countries in which there are substantial grounds to believe that an individual would be in danger of being subjected to torture, ill-treatment and even the death penalty.¹⁵ Human Constanta has documented numerous cases where asylum was denied in Belarus, followed by deportations to countries of origin, despite direct threats to the individuals or ongoing armed conflict. These cases include Mehrdad Jamshidiyan, who faced the death penalty in Iran;¹⁶ Syrian citizens who were denied protection on formal grounds, such as violating the “first safe country” rule;¹⁷ Hijri Mamash, who faced unjust persecution and torture in Turkey;¹⁸ and human rights defender Nizomiddin Nasriddinov, a refugee in Germany, who was at risk of criminal prosecution for his political beliefs and subjected to torture or other cruel, inhuman, and degrading treatment or punishment.¹⁹ It should be noted that Belarus has repeatedly ignored rulings and requests from international organisations, including decisions by the UNHCR, and has proceeded with expulsions despite these interventions.²⁰

¹³<https://www.lawtrend.org/english/monitoring-of-the-situation-with-freedom-of-association-and-the-status-of-civil-society-organizations-in-the-republic-of-belarus-july-2024>.

¹⁴ <https://by.usembassy.gov/2022-country-reports-on-human-rights-practices-belarus/>.

¹⁵ CAT/C/BLR/CO/5: Concluding observations on the fifth periodic report of Belarus, Committee against Torture, 7 June 2018, <https://documents.un.org/doc/undoc/gen/g18/172/24/pdf/g1817224.pdf?OpenElement>.

¹⁶ Human Constanta human rights organization’s position on the case of Mehrdad Jamshidian, Human Constanta, 24 June 2019, <https://humanconstanta.org/en/human-constanta-human-rights-organizations-position-on-the-case-of-mehrdad-jamshidian/>.

¹⁷ *Forced Migration in Belarus*, Human Constanta Analytical Paper, 20 June 2017, <https://humanconstanta.org/vynuzhdennaya-migraciya-v-belarusi/>.

¹⁸ Human Constanta asks not to extradite the man to Turkey where he is under the threat of tortures, Human Constanta, 13 May 2020, <https://humanconstanta.org/en/human-constants-asks-not-to-extradite-the-man-to-turkey-where-he-is-under-the-threat-of-tortures/>.

¹⁹ Belarus: Don’t Return Activist to Tajikistan, Human Rights Watch, 21 March 2023, <https://www.hrw.org/news/2023/03/21/belarus-dont-return-activist-tajikistan>

²⁰ <https://humanconstanta.org/komitet-po-pravam-cheloveka-oon-trebu-et-ne-vysylat-kurda-xidzhri-mamasha-iz-belarusi/>

10. In addition, following the 2020 presidential elections, the attitude of Belarusian state bodies towards foreign citizens has significantly worsened, contributing to a large-scale legal collapse in the country. From August to December 2020 alone, Human Constanta recorded over 170 cases of foreign citizens being detained in Belarus and subsequently deported without access to a fair appeals process and amid clear political motives for persecution.²¹
11. In the fall of 2021, Belarusian authorities signed a protocol on cooperation for the voluntary return of foreign citizens to their home countries or countries of permanent legal residence. While this allowed several hundred migrants to return safely, in some cases, the return was forced. Migrants were pressured to sign voluntary return documents without the procedure being properly explained to them, nor were they informed about the possibility of applying for protection in Belarus. Human Constanta gathered testimonies from several migrants, including Cuban nationals, who reported being confined to hostels and prevented from interacting with the outside world until the voluntary return procedure was completed.²² The UN Special Rapporteur on the human rights of migrants also noted that the majority of migrants in refugee camps were either asked to sign voluntary return documents or forced to leave the facility toward the Polish border.²³ Belarusian authorities also forcibly returned asylum seekers to their countries of origin, ignoring ongoing armed conflicts and the scale of human rights violations in those countries, and without assessing migrants' protection needs.²⁴
12. According to official statistics, in 2021 alone, about 4,000 migrants left Belarus on evacuation flights; 1,126 decisions were taken on deportation and 835 decisions were taken on expulsion of aliens from Belarus.²⁵

Part III. The means of legal entry into Lithuania from Belarus through official border checkpoints

13. According to Belarusian legislation (Law of the Republic of Belarus dated 21 July 2008, No. 419-Z, *On the State Border of the Republic of Belarus*), the crossing of the State Border by individuals, vehicles, and goods is carried out at designated border crossing points and consists of the recognition of the legality of border crossing by

²¹ *Foreign citizen's rights in Belarus after August 2020*, Human Constanta Report, 18 January 2021, <https://humanconstanta.org/en/foreign-citizens-rights-in-belarus-after-august-2020/>.

²² *2022 Humanitarian Crisis in Belarus and at the border with the European Union*, Human Constanta Report, https://humanconstanta.org/wp-content/uploads/2023/03/2022-Humanitarian-crisis-in-Belarus-and-at-the-border-with-the-EU_report.pdf.

²³ A/HRC/53/26/Add.2: Visit to Belarus, Report of the Special Rapporteur on the human rights of migrants, Felipe González Morales, 18 May 2023, <https://documents.un.org/doc/undoc/gen/q23/097/24/pdf/q2309724.pdf>.

²⁴ *Belarus/EU: New evidence of brutal violence from Belarusian forces against asylum seekers and migrants facing pushbacks from the EU*, Amnesty International, 20 December 2021, <https://www.amnesty.org/en/latest/news/2021/12/belarus-eu-new-evidence-of-brutal-violence-from-belarusian-forces-against-asylum-seekers-and-migrants-facing-pushbacks-from-the-eu/>.

²⁵ CAT/C/BLR/6: Sixth periodic report submitted by Belarus under article 19 of the Convention in accordance with the simplified reporting procedure, due in 2022, 28 November 2022, <https://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=6QkG1d%2FPpRiCAqhKb7yhsuYlhpYYu%2B7c2v1wUXnRL6x%2FmsxdejPVaj0MPaTRqj8RG4dvw12ZUMRrsN8oU6E7dwhBaFYt7jkcJr3XRayKXIsWNfjXz8glcttwz8gWOxr>.

individuals and vehicles entering the Republic of Belarus, as well as the movement of goods imported into the territory of the Republic of Belarus. It also involves granting permission for the crossing of the State Border by individuals and vehicles leaving the Republic of Belarus. The process of crossing the State Border by individuals, vehicles, and goods includes the conduct of border control and customs control (in simplified border crossing points – border control only), as well as other types of control as prescribed by legislative acts. The basis for crossing the State Border by individuals, vehicles, and goods is the possession of valid documents required for entry into and/or exit from the Republic of Belarus, as stipulated by international treaties of the Republic of Belarus and legislative acts. Belarusian border service agencies use a risk management system to identify, predict, and prevent individuals from violating the established rules for crossing or passing through the State Border. However, the Law and other legislative norms do not specify the exact content of this risk management system. In practice, this means that Belarusian border service agencies attempt to prevent unauthorised border crossings, including entry into neighbouring states without the necessary documents or permits. This may involve checking valid visas or residence permits issued by EU countries, allowing Belarusian citizens and foreigners to cross both sides of the border. The State Border Committee has confirmed this practice, explaining that it aims to prevent issues that may arise at neighbouring checkpoints.²⁶ In fact, individuals arriving from the territory of Belarus must first undergo control by Belarusian state border guards before they can contact Lithuanian officials at official border crossings. Only after the former allow them to pass can they reach Lithuanian border guards and exercise their right to request asylum. However, without valid Schengen visas or residence permits, foreigners are not permitted to exit Belarusian territory through official border checkpoints.

14. In addition, according to the Presidential Decree of the Republic of Belarus dated 10 May 2006, No. 313, *On Checkpoints Through the State Border of the Republic of Belarus and the Types of Control Performed at Them*, there are three main types of border crossings: road border crossings, railway border crossings, and airport border crossings. Since 2021, travelling from Belarus to Lithuania by train or plane has become unavailable due to EU sanctions against Belarusian de facto authorities, which have halted air and rail passenger traffic with Belarus. As a result, the only available way to enter Lithuania from Belarus is through road border crossings by vehicle, as crossing on foot has been prohibited at road border crossings in Belarus since 1 October 2014. The Law of the Republic of Belarus dated 10 January 2015, No. 242-Z, *On Amendments and Additions to Certain Laws of the Republic of Belarus on Issues of Public and Border Security*, expanded the rights and responsibilities of passengers and carriers engaged in passenger transportation by internal water, sea, road, or air transport. Specifically, carriers are authorised to verify passengers' documents required for entry into the destination country or for transit, and to refuse transportation if passengers do not present the necessary documents. Additionally, under the Law of the Republic of Belarus dated 21 July 2008, No. 419-Z, *On the State Border of the Republic of Belarus*, vehicle drivers are required to ensure that passengers are not transported to border crossing points without the documents

²⁶ У тех, кто выезжает за границу без визы, начали требовать показывать ВНЖ. Что известно, Nasha Niva Media, 11 May 2023, <https://nashaniva.com/ru/316359>.

necessary for entry into or exit from the Republic of Belarus. As a result, bus and taxi drivers are obliged to check passengers' valid Schengen visas or residence permits, and individuals without such documents will not be allowed to board buses or taxis travelling from Belarus to Lithuania.

15. On 8 November 2021, large groups of migrants were reported to have arrived at the border crossing between Belarus and Poland. According to media reports, Belarusian Border Service personnel did not allow the migrants to approach the crossing point itself but directed them to the forest near the border.²⁷ During the ongoing humanitarian crisis in Belarus and at its borders, Human Constanta collected testimonies from migrants describing physical barriers created by Belarusian border guards, preventing them from crossing through official border checkpoints and applying for protection there. One Cuban citizen recounted that she and her family arrived in Belarus from Russia via the land border. She cited persecution by Cuban state authorities, due to her membership in an opposition political party, as the reason for fleeing Cuba. After learning from the news about the possibility of crossing into the EU, they independently mapped a route across the Belarus-Poland border. According to her account, Polish border guards heavily patrolled the area, leaving no opportunity to cross. Meanwhile, Belarusian border guards repeatedly forced them to attempt crossing with threats and violence, beat them, and deprived them of water and food.

Part IV. Treatment of migrants by Belarusian border guards in border regions

16. According to numerous reports from migrants in 2021–2022, Belarusian border guards continued to push or directly force people to cross the borders into Lithuania, Latvia, and Poland, avoiding official border checkpoints. When attempts to cross the border failed, migrants were often stranded in the forest, struggling to survive without shelter, food, water, or access to medical care. Many remained in the forest, where they endured daily abuse by Belarusian border guards, who repeatedly forced them to try crossing into EU countries. Human Constanta recorded several accounts of migrants being robbed by Belarusian border guards and reports of people in serious physical condition stuck in forests near the border areas with Poland, Lithuania and Latvia.²⁸ Due to the unacceptable living conditions in the forests and a sharp drop in temperature during the fall/winter period, as well as intimidation and beatings by border guards on both sides of the border, migrants were often unable to move independently and needed to be transported to medical facilities. In most cases, ambulance crews or border guards on the Belarusian side refused to evacuate people from the forests, leaving them in dangerous conditions. However, the Border Committee is the only agency that can directly assist migrants in the border zone.
17. In one interview, a migrant reported to Human Constanta that Polish border guards directly negotiated with Belarusian border guards regarding the return of people to Belarusian territory, bypassing official procedures. On the Belarusian side, border guards held a group of migrants in the forest for several days without providing food

²⁷ *Humanitarian Crisis in Belarus and at the border with the EU, June 2021-February 2022*, Human Constanta Report, <https://humanconstanta.org/humanitarian-crisis-en-2021-2022/>.

²⁸ *2022 Humanitarian Crisis in Belarus and at the border with the European Union*, Human Constanta Report, https://humanconstanta.org/wp-content/uploads/2023/03/2022-Humanitarian-crisis-in-Belarus-and-at-the-border-with-the-EU_report.pdf.

or water. The Belarusian border guards did not allow the migrants to return to Minsk or any other city, explicitly stating that they could only leave the makeshift camp in the forest in one direction — toward the EU border.²⁹ This practice was confirmed in a statement by the UN Special Rapporteur on the human rights of migrants, who visited Belarus in the summer of 2022. He stated that the majority of migrants placed in the Bruzgi refugee centre in Belarus were not allowed to leave the facility, except in the direction of Poland.³⁰

18. In an in-depth interview, a Syrian migrant explained that he travelled through Lebanon, where he obtained a Belarusian visa. He cited threats to his life, the risk of arrest, forced conscription, war, and the loss of his home as the reasons for fleeing Syria. He learned about the opportunity to come to Belarus through social media platforms like Facebook and Telegram. He paid \$4,500 for the visa procedures and travel, eventually arriving in Belarus on 10 October 2021. Over the course of four months, he made 36 attempts to cross into Poland or Lithuania. His last attempt took place on the night of 17 February 2022, near Brest. However, he and other migrants were apprehended by men in uniform, who, according to the interviewee, were Belarusian border guards. "They sprayed pepper spray in my face, took my money and personal belongings, even my clothes and food, and beat us. One of the officers beat me until I unlocked my phone. He began logging into apps and reading my messages."³¹
19. As mentioned above, Belarusian border guards failed to provide adequate assistance to individuals in border regions who were in urgent need of care, many of whom faced life-threatening conditions after spending days and nights in the forest, exposed to low temperatures. This negligence presumably led to numerous cases of migrants going missing or dying in these border areas. On 4 August 2021, several months after the humanitarian crisis began, Belarusian authorities officially acknowledged the first death of a migrant on the Belarusian-EU border. Following this, the Belarusian Border Committee began regularly documenting and reporting new fatalities. By the end of March 2024, the official number of deceased migrants found on Belarusian territory had reached 47. The number of missing migrants remains unknown. According to statements by migrants, the primary risk factors at the border include exposure to cold weather, a shortage of food and water, and physical assaults by border guards. These assaults often result in severe injuries, including significant blood loss from dog bites. Migrants emphasise that border guards often confiscate their personal belongings, including phones, which are essential for finding their way out of the forest.³²

²⁹ *Humanitarian Crisis in Belarus and at the border with the EU, June 2021-February 2022*, Human Constanta Report, <https://humanconstanta.org/humanitarian-crisis-en-2021-2022/>.

³⁰ A/HRC/53/26/Add.2: Visit to Belarus, Report of the Special Rapporteur on the human rights of migrants, Felipe González Morales, 18 May 2023, <https://documents.un.org/doc/undoc/gen/g23/097/24/pdf/g2309724.pdf>.

³¹ *Humanitarian Crisis in Belarus and at the border with the EU, June 2021-February 2022*, Human Constanta Report, <https://humanconstanta.org/humanitarian-crisis-en-2021-2022/>.

³² *No Safe Passage. Migrants' Deaths at the European Union-Belarusian Border*, Human Constanta (Belarus), Ocalenie Foundation (Poland), I want to help Refugees (Latvia), Sienos Grupe (Lithuania) Report, 2024, https://en.ocalenie.org.pl/wp-content/uploads/2024/07/ENG_No-Safe-Passage.-Migrants-deaths-at-the-European-Union-Belarusian-border.pdf

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