



# Assessment for Poland (Walbrzych )

Status: Draft Plan

Date of plan: 07.05.2021



## Overall Plan Rating

There are also some indicators rated as not consistent with the just transition. These are marked as red on the traffic light system and should be the foremost priorities to address and improve on. The indicators are organised under their corresponding principles in the Annex to this report.

## Performance of TJTP by principle



**Principle 1:** The TJTP should be sustainable and deliver on long-term, international and EU climate commitments such as the Paris Agreement and EU 2030 and 2050 climate objectives.



**Principle 2:** The TJTP should not lead to prolonged fossil fuel use or promote false solutions to the transition to climate neutrality. As a guide, coal should be phased out by 2030.



**Principle 3:** The TJTP should lead to sustainable economic diversification at the local, regional and national level.



**Principle 4:** The TJTP should address social inequalities, improve interregional solidarity, decrease inequalities and tackle injustices.



**Principle 5:** The TJTP should not harm EU environmental and climate objectives and values.



**Principle 6:** The TJTP should respect the polluter pays principle.



**Principle 7:** The TJTP should be supported by adequate, coordinated and long-term public and private funding sources.



**Principle 8:** The TJTP should be designed, monitored and evaluated through meaningful partnerships which engage all stakeholders in an open, inclusive and ongoing process, especially at local level. Social dialogue and collective bargaining should be central pillars of the transition when it comes to the labour market and enterprises.



**Principle 9:** The TJTP should take a place-based, local approach to strategy design and implementation.



**Principle 10:** The TJTP should be developed based on high quality, independent and objective analysis of the challenges and opportunities of the transition for regions.

## Breakdown by indicator



### Principle 1

The TJTP should be sustainable and deliver on long-term, international and EU climate commitments such as the Paris Agreement and EU 2030 and 2050 climate objectives.



Indicates a commitment to at least a 65% reduction in GHG emissions at regional or national level by 2030

- ✓ Greenhouse gas emissions reduction is part of the project selection criteria or specific project/programme results indicators

Comments: The plan aims to be in line with the Green Deal and stresses the need to reduce emissions, as well as the importance of climate neutrality. However, it doesn't itself mention the target date, % or make clear there is a need to reach climate neutrality (it refers to optimally reducing carbon footprint).

The -65% is captured by the 2030 Decarbonisation Plan Wałbrzych has committed to. This signals a political decision to decarbonise the region by 2030 and neutrality climate until 2040.



Identifies the opportunities to increase renewable energy in the region and specific actions, projects or targets are proposed



Identifies the opportunities to increase energy efficiency or reduce energy use in the region and specific actions, projects or targets are proposed

- ✓ Energy efficiency indicators are included as specific project/programme results indicators
- ✓ 'Energy efficiency first' is outlined as a key principle in relevant project selection criteria

Comments: The plan stresses the importance of energy efficiency "The starting point for energy transformation is the improvement of energy efficiency. Much emphasis is placed on improving building energy efficiency, but also that of industrial processes.



### Principle 2

The TJTP should not lead to prolonged fossil fuel use or promote false solutions to the transition to climate neutrality. As a guide, coal should be phased out by 2030.



A phase-out of coal is planned or implied (the fossil fuel is recognised as in terminal decline), but the end date is after 2030 or undefined

Comments: All coal activity has ended in this region (closing started in 1990 - last mine in 1995). However, coal is still used for heating and electricity generation: around 100k coal-fired furnaces are estimated to require replacement, and 80,000 buildings are decapitalised in the Wałbrzyski Subregion that need to be modernised from a heating standpoint and need a comprehensive revitalization



A complete phase-out of fossil gas is planned or implied in the territory by 2035

Comments: Renewable energy is clearly emphasised, but gas is not explicitly excluded. The plan does not indicate an intention to support gas (however, leaders are aware of the ban on the use of gas in the JTF). A previous version of the plan mentioned plans by Wałbrzyskie Przedsiębiorstwo Energetyki Ciepłej S.A.'s to convert coal boilers to gas-fired boilers, but the situation here is evolving with a will to go towards PV, heat pumps and biogas. It also mentioned the potential of generating electricity from Hydrogen in future (a sub-optimal use of a limited resource) and Hydrogen remains prominent in the May TJTP.

The Dekarbonizacja 2030 Declaration signed in September 2020 however sets out how the region will use heat and energy only from renewable sources by 2030.



Not enough information available or fossil fuel subsidies not discussed

Comments: Mentions the existence of coal allowance (and equivalents) still received by 11000 pensioners.



### Principle 3

The TJTP should lead to sustainable economic diversification at the local, regional and national level.



Promotes economic diversification, but there is no consideration of the need for new industries to be sustainable

Comments: Heavy focus on bioeconomy, but it is not stressed that all sectors must be sustainable. There is a strong commitment to the ideas of the Green Deal and 'Green Transformation projects'. A commitment to assess activities against do no significant harm criteria would provide security here.

- Recognises the value of SMEs and start-ups, setting out a clear plan for their support and incentivisation e.g. through dedicated incubators
- Indicates a link to and a need for consistency with the NECP, but does not clearly link investments for sustainable economic diversification and decent job creation to it



## Principle 4

The TJTP should address social inequalities, improve interregional solidarity, decrease inequalities and tackle injustices.



Justifies why certain regions should receive support with reference to the underlying economic and employment impacts of the transition, and justifies the choice objective criteria or comparative data



Prioritises employment support and job search assistance for workers directly losing their jobs as a result of the transition AND other worker groups, including those who may be indirectly affected



Identifies the existing and future skills, training and education gaps for all workers and sectors, including future generations, at regional level on the basis of objective and quality skills forecasts or clearly sets out a process to identify them

Comments: Could strengthen links with employers to keep identifying skills needs over time.



Foresees only insignificant or non-specific actions and investments to address these gaps and ensure sufficient and decent, sustainable and resilient jobs, or focuses only on reskilling workers directly affected by the transition



Does not consider the quality of new jobs or include measures to address the issue

Comments: It assumes new jobs will be good in its vision for the future, "A significant part of the population is retraining to work in green technologies, in innovative SME companies offering interesting work and good salaries."



Recognises some inequalities and identifies some measures to address those arising from the transition, such as a minimum income support, energy poverty reduction or early pensions. But the TJTP does not consider existing inequalities or address all inequalities identified with planned measures



Identifies the potential changes to quality of life arising from the transition and includes some targeted measures to address residual negative factors, such as air and water quality issues



makes reference to the importance of supporting gender equality but does not propose any dedicated activities or priorities to achieve this

Comments: Some references are made, and activities proposed, to support women in the workplace.



## Principle 5

The TJTP should not harm EU environmental and climate objectives and values.



Does not include activities which would negatively impact environmental and biodiversity indicators relating to:

- Biodiversity
- Air pollution
- Accessible greenspace (land take)
- Water quality

AND neither does it include significantly harmful activities as defined by the EU Taxonomy or which would lead to unsustainable use of natural resources or which would lead to ecosystem harm

Comments: No exclusion list, including for gas and a potential for waste to energy.



Foresees investments in infrastructure which could indirectly lead to greater greenhouse gas emissions and fossil fuel-based activities, such as motorways (if alternatives such as railway investment have not been explored) and internal combustion engine manufacturing facilities

Comments: The plan does emphasise the importance of rail networks, but opens the door to new road and car use by outlining the opportunity for, "Expansion of road and rail infrastructure: Development of road and railway infrastructure, including express roads S3, S8 and S5 ". the plan recognises, "the second and unfortunately growing source of CO2 emissions is passenger cars, the transport sector is responsible for almost 30% of these emissions."

It also includes waste energy recovery potential.



Identifies actions or activities to improve a wide range of environment and biodiversity indicators in the regions concerned. It includes, as a minimum, actions or activities relating to at least 3 of the following categories:

- Biodiversity
- Air pollution
- Accessible greenspace (land take)
- Water quality



Includes investment in waste incineration or new landfill capacity

Comments: Waste to energy ('energy recovery') is included as a possibility, and it is suggested that "part of the [organic] waste biomass will be used in district heating installations displacing fossil fuels. Waste-to-energy is also mentioned.



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## Principle 6

The TJTP should respect the polluter pays principle.



The TJTP does not identify the entities responsible for existing environmental damage.

AND/OR the TJTP recommends to use JTF resources to pay for land restoration without an analysis - or commitment to an analysis - of the possibility and applicability of the Polluter Pays Principle



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## Principle 7

The TJTP should be supported by adequate, coordinated and long-term public and private funding sources.



Relies on EU funds only to deliver the just transition (although not limited to the Just Transition Fund and the Pillar III of the Just Transition Mechanism)

AND/OR there is no clear targeting of funds for the most appropriate activities or to address funding gaps

Comments: Section missing so far, but indicated in contents: Social Plan for Equitable Transformation of the Walbrzych Sub-region- sources of financing.



Private funding sources are identified alongside public funding sources, with an indication of how private funds may be leveraged using a variety of mechanisms.

Comments: Suggests that the "Decentralised Energy Transformation Hub (ZHTE) " will - initiate "public-private-social partnerships in order to implement larger-scale projects and mobilise additional funds for their implementation..."



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## Principle 8

The TJTP should be designed, monitored and evaluated through meaningful partnerships which engage all stakeholders in an open, inclusive and ongoing process, especially at local level. Social dialogue and collective bargaining should be central pillars of the transition when it comes to the labour market and enterprises.

- A coordination body is established but membership of the coordination body requirements and composition may be unclear.

AND / OR

Details on procedures are vague without transparency on timing and schedules for such meetings, or on how, when or where information on process and relevant documents will be published in an accessible place. Alternatively the majority of information must be directly requested from the institution responsible rather than openly available.

Comments: A list of those in the 'social team', but not th 'ecological' or 'economic' teams is provided, but no criteria for membership elaborated.

- Includes no identification of stakeholders, their roles and status in the process

OR

Includes an incomplete identification of stakeholders, missing key groups and which is inconsistent with the comprehensive list identified in Article 3 of the European Code of Conduct on Partnership, even if roles and status of the stakeholders identified in the process are indicated

- Limited detail on how stakeholder views and consultation inputs were integrated into the final plan, or how they will be (beyond a commitment to a consultation, for example). Detail on stakeholder engagement plans for the preparation, implementation, monitoring and evaluation of the TJTP is also limited.

Comments: A lot of detail on the need to inform local people about the plan and its objectives, as well as the Green Deal is given.

- Public consultation and engagement of all stakeholders while all options are open is provided for, but the period of consultation and engagement is launched with less than 4 weeks prior notice

AND/OR

The period for consultation and engagement lasts for less than 12 weeks

AND/OR

There is less than 4 weeks to comment on the final draft

AND/OR

Not all relevant stakeholders have been given the opportunity to participate in a public consultation.

Comments: There was a consultation until November 16th 2020 to submit ideas for the development of the draft plan.

Consultations were also carried out within the Lower Silesia Working Group for Just Transition - which included local governments, local business, some NGOs - but there were no open, public consultation for the citizens.

- Social dialogue is not a part of the planning process, or is mentioned only passively. Labour unions and social partners have not been engaged in social dialogue during the development of the TJTP.

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## ● Principle 9

The TJTP should take a place-based, local approach to strategy design and implementation.

- Identifies NUTS 3 regions which will require targeted action and prioritises measures for the specific NUTS 3 regions concerned

- Notes the need for community engagement and acknowledges existing or planned community initiatives, but does not indicate how these will be integrated into the TJTP or how the community will be engaged and informed

Comments: Much emphasis is place don communicating to the local community about the plan and the Green Deal, but it is not clear how the community's input will be taken into account.

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## Principle 10

The TJTP should be developed based on high quality, independent and objective analysis of the challenges and opportunities of the transition for regions.



The indicators and/or data included in the TJTP are focused at the regional level and are high quality, appropriate to the goals of the fund to address the socioeconomic challenges arising from the transition to climate neutrality and they are comprehensive, encompassing both quantitative and qualitative measures

Comments: Indicators are not fully detailed, but are outline din the 'expected results' sections.



The TJTP does not foresee a revision process even to remedy poor performances or ensure consistency with a revised NECP

Comments: No review process is explicitly mentioned.

## Comments

The # Dekarbonizacja2030 declaration sets out an ambitious vision of the development of the Wałbrzych Subregion, with carbon-free in energy and heating in 2030, a reduction of CO2 emissions by 55% in 2030, and climate-neutrality in 2040. Through it, local leaders of all 49 municipalities of the subregion have signed up to the objectives of the Green Deal.

**For further information on the TJTP assessment tool**

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