



# Assessment for Poland (Upper Silesia (calibrated assessment))

Status: Draft Plan

Date of plan: 01.03.2021



## 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 reduce GHG emissions but by < 55% emissions reduction versus 1990 levels by 2030 OR it does not indicate a need to reduce emissions at all



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 or nationally, but no specific actions, projects or targets are proposed

---



### 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: 2049 is the latest indicated mine closure date



No phase-out of fossil gas is planned or implied



Not enough information available or fossil fuel subsidies not discussed

---



### Principle 3

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



Promotes economic diversification, and explicitly recognises (e.g. in the assessment of the transition challenges) that all sectors of the economy must become sustainable

Comments: "Changing the economic structure of the voivodeship, so far based on traditional sectors, will require the creation of new jobs in sectors related to the green and innovative economy." This is recognised, but it is hard to see how it is put into practice.



Recognises the value of SMEs and start-ups, setting out a clear plan for their support and incentivisation e.g. through dedicated incubators

✓ Includes programme specific indicators (section 2.5) to measure support to, or success in supporting, SMEs and start-ups.

Comments: A number of output and outcome indicators are included relating to SMEs, but little detail is provided on direct support measures. However, references to enterprise support are generally quite generic and not specific to SMEs.

Large enterprise support is left open.



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

Comments: The Polish NECP is very weak. The plan must go further.

---



### 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
- Foresees targeted investments sufficient to remedy these gaps and create decent, sustainable and resilient jobs for all current (and future) workers in the region
- Does not consider the quality of new jobs or include measures to address the issue
- 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
  - ✓ Includes programme specific indicators (section 2.5) to assess change in quality of life or project selection criteria to prioritise quality of life improvements
- fails to recognise the importance of supporting gender equality in the just transition plan

## ● Principle 5

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

- Includes activities which would negatively impact environmental and biodiversity indicators relating to:
  - Biodiversity
  - Air pollution
  - Accessible greenspace (land take)
  - Water quality

AND/OR it includes 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: Waste incineration 'for energy recovery' is promoted, although circular economy is referenced. This could lead to perverse incentives not to decrease harmful waste. There is no exclusion list.

- Foresees investment in new fossil fuel infrastructure, including for example for power generation, heating, fossil fuel-based chemicals manufacture or aviation capacity. A red rating is also given if the TJTP foresees investments which would prolong the life of existing fossil-based infrastructure, for example retrofits in existing EU ETS installations
- 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 programme specific indicators (section 2.5) to measure biodiversity or environmental quality
- Includes investment in waste incineration or new landfill capacity

## ● 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

## ● 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
- Private funding sources are not identified and public funding appears to be the sole source of funding identified for the activities and the investments outlined in the TJTP

---

## ● 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.

- Clearly and comprehensively identifies stakeholders, including key groups as identified in the European Code of Conduct on Partnership, but includes no indication of or justification for their roles and status in the process

Comments: Not clear how experts for the 'expert workshops' were selected. There is anecdotal evidence 'government opposition groups' were excluded.

The region did however organise 18 webinars with different stakeholder groups. They also have a dedicated website for the topic and communicate openly on it.

- 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.

✓ The plan recognises the need to support capacity building of some stakeholders, particularly those with limited resources, to enhance their engagement

Comments: Social dialogue not mentioned, but trade unions involved in the consultations

- Public consultation and engagement of all relevant stakeholders while all options are open is provided for, the period of consultation and engagement is launched with at least 4 weeks prior notice, the period for consultation and engagement lasts for at least 12 weeks and there are at least 4 weeks to comment on the final draft

- Tripartite social dialogue is part of the planning process. At least some labour unions and social partners have been engaged in social dialogue during the development of the TJTP. Social dialogue is conducted to address the impacts of the transition on sectors which are phasing out and transforming, but not necessarily for emerging sectors.

Comments: Social dialogue is not explicitly mentioned, but unions have had a privileged place versus other stakeholders in the development of the plan.

---

## ● 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

- Takes into account the need for community engagement, indicates how existing and planned community initiatives may be integrated into the TJTP and makes clear provision to engage and inform the local community

---

## ● 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
- The TJTP foresees a revision process by the Member State regularly, following the update of its NECP or following the mid-term review of programmes. The revision process includes an evaluation of implementation so far and is to be carried out in consultation with stakeholders and partners as identified in the European Code of Conduct on Partnership

Comments: The Plan will be reviewed once a year at annual meetings of the European Commission and the Member State, but it doesn't state how and if this review will be carried out in consultation with stakeholders and partners as identified in the European Code of Conduct on Partnership.

## Comments

Clear schedule of mining closure inclusion is a positive point, but the timeline is too slow for consistency with climate neutrality in line with the Paris Agreement, as well as economics.

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

Imke Luebbeke

Head of Climate and Energy, WWF European Policy Office

**Contact**

Katie Treadwell

Energy Policy Officer, Climate and Energy team, WWF European Policy Office

ktreadwell@wwf.eu

Romain Laugier

Climate Officer, Climate and Energy team, WWF European Policy Office

rlaugier@wwf.eu

WWF does not claim responsibility or endorse any assessment produced by this tool unless verified.

WWF European Policy Office, 123 rue du Commerce, 1000 Brussels, Belgium.