



# Assessment for Poland (Lodskie)

Status: Draft Plan

Date of plan: 07.06.2021



## 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

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### 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 55% GHG emissions reduction versus 1990 level by 2030 at regional or national level

✔ The plan will be revised to take into account the updated EU 2030 target

Comments: Emissions reduction nearly 80% from Bełchatów energy complex.

The plan claims to be already aligned with - 55% GHGs



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

Comments: Energy efficiency mentioned frequently, but unclear on exact initiatives and not excluding fossil fuels

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### 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



No phase-out of fossil gas is planned or implied

Comments: A new gas steam turbine foreseen instead of a nuclear plant at Bełchatów by PGE, claimed to have potential to use hydrogen in future,



Does not propose to phase out fossil fuel subsidies, or even proposes to introduce new or increase existing ones

Comments: Gas projects implied to be financed through just transition funds as they are listed in types of projects to be selected.

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### 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: Mentions emphasis on green economy.



Recognises the value of SMEs and start-ups for economic diversification, but does not set out clearly how it will provide support to develop and incentivise them

Comments: Relatively vague on direct measures for SMEs - not clear if priority over supporting large enterprises,



Indicates a link to and a need for consistency with the NECP's objectives. Provides a clear prioritisation of funding and investment needs into different sectors, labour market adjustments and for relevant reskilling and upskilling in line with - or going further than - the most up to date NECP for sustainable economic diversification and to create decent, sustainable and resilient jobs

Comments: Polish NECP is not very ambitious.

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### 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

Comments: Uses unconfirmed data for numbers of indirect jobs created by mine and plant.

- 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: More details would be helpful, focus on miners and PGE employees, but not exclusively. Will work with schools and employers to identify needs.
- 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  
✔ Includes programme specific indicators (section 2.5) to measure the uptake of skills courses or training  
Comments: Only 1 indicator on skills (in SMEs)
- Recognises the risk that new jobs created don't offer the same quality or wages as jobs in declining industries and the need to include measures to tackle this, but doesn't consider all factors of decent work, such as access to collective bargaining, or safe, healthy working conditions and reasonable working hours  
Comments: mentions attractive jobs as being important, but includes no measures or means to ensure new jobs meet this standard.
- 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  
Comments: Mentions need to help currently uneconomically active women to get into employment and to help the elderly.
- Identifies the potential changes to quality of life arising from the transition and includes measures to address both residual negative factors, such as air and water quality issues and identifies proactive measures to improve quality of life, such as creation of recreation spaces and addressing corruption
- includes provisions to actively support gender equality, including equality of opportunity for women and the inclusion of women in the labour market  
Comments: One specific activity mentioned: development of childcare facilities.



## 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: Foresees investment in fossil gas infrastructure and a possible fossil gas plant (potentially after 2030).
- 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

- Foresees no new investment in waste incineration or landfill capacity.  
AND  
Includes or prioritises new activities which would favour a circular, rather than a linear economy and which will not increase greenhouse gas emissions.  
Comments: References recycling, no exclusion of landfill

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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

- ✘ The TJTP contravenes the Polluter Pays Principle by prioritising energy transition investments in companies with grants from the just transition fund, without a clear justification of why the companies cannot cover these costs by alternate means

Comments: Plan does not include any controls or justification for financing energy transition projects which may be foreseen in large companies. A list of PGE projected operations is included and a decision will be made on whether financing will come from the national just transition plan or the JTF "at a later date"

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## ● Principle 7

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

- EU funds and national public funds are identified to support the just transition: other sources of public funding than the Just Transition Fund and the Pillar III of the Just Transition Mechanism are identified, including national sources. Funding sources are targeted to the most appropriate activities or to address funding gaps

Comments: Does mention national plan for fair transformation, but not too specific.

- Private funding sources are identified alongside public funding sources, with an indication of how private funds may be leveraged, mainly or exclusively relying on Pillar II of the Just Transition Mechanism

Comments: Private investors recognised as needing to be attracted to the region, but not specific actions. Doesn't specify which funds or how they will contribute directly to the plan.

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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: No civil society in the team for developing the plan and no clear criteria for selection. No commitment to transparency.

- 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: No clear capacity building measures of less well-resourced stakeholders.
- 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: Only 13 days to comment on 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.

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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: Community mentioned 4 times, PGE mentioned 42. Does mention need to activate local community e.g. through NGO development under objective 2.

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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 focus on national-level goals such as economic growth only and may not be high quality

AND/OR

are inappropriate to, or contradict the goals of the fund to address the socioeconomic challenges arising from the transition to climate neutrality

Comments: The plan is based on poor quality data for the analysis, resulting in biased conclusion. E.g. job multipliers for indirect employment are unverified and little information on impact on local budgets of the transition is affected.

For example, indirect job creation of mining multipliers are unverified and exceed those proposed by on the ground studies conducted by non-industry bodies.

This must be corrected before the plan can be approved.
- The TJTP foresees a revision process by the Member State but the process is vague, for example it does not include a date, or an evaluation of implementation so far

## Comments

The plan is heavily criticised for having been based on poor quality for the analysis, resulting in a biased conclusion. For example, indirect job creation of mining multipliers are unverified and exceed those proposed by on the ground studies conducted by non-

industry bodies.

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

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