



# Assessment for Poland (Malopolska)

Status: Draft Plan

Date of plan: 11.03.2021



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

Comments: The plan states that the regional development plan will be updated to reflect higher GHG targets in 2022, but doesn't indicate the TJTP will be updated.

It is not clear whether GHG emissions reduction is a specific project selection criterion.



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

Comments: The draft plan lacks very specific detail on renewable energy projects, but includes investing in RES installations in the types of operations envisaged and RES is seen as important for energy security. Specific opportunities are vaguely included relating to investing in RES in public buildings.



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

Comments: A specific energy efficiency fund is proposed for renters, as well as some types of operations, but other projects are vague or not elaborated. Energy efficiency first is not clearly included as a guiding principle. This needs to improve.



### 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: The plan hints that the transition out of coal may go faster than officially recognised, but there is a lack of planning for a 2030 coal phase out (in line with international climate commitments and limiting global temperature rise to 1.5 degrees). This means the plan falls short of a full preparation for the necessary and likely outcome of a complete phase out by 2030. There is a plan to reduce usage of coal in households until 2030, leading to 76% CO2 reduction in the residential sector



No phase-out of fossil gas is planned or implied

Comments: The Regional development plan is referenced as likely to be updated with a 2050 climate neutrality target, which would also see a complete coal and gas phase out in the municipal and household sector by 2030. But this is unconfirmed in the plan and increases in 'gaseous fuel' (possibly, but not limited to biogas and hydrogen) are 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: A specific objective is included on diversification for a stable economy and sustainable development is a 'key priority'. This could be reinforced for instance, by including specific indicators or project selection criteria linked to sustainability of productive investments and for sustainability of new sectors supported etc. Some relevant types of operations are included targeting support for 'climate transition' of local municipal and business entities.

- Recognises the value of SMEs and start-ups, setting out a clear plan for their support and incentivisation e.g. through dedicated incubators
  - ✖ TJTP plans to provide excessive or unjustified support to large enterprises, particularly from the Just Transition Fund
- Comments: A number of specific activity types are included in section 2.4, including e.g. small grants and a dedicated acceleration programme for small and micro companies.
- 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
  - Comments: Małopolskie is however not included in the 3 regions the Commission indicates should be prioritised for JTF resources in Annex D of the 2020 country reports.
- 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
  - Comments: Some generic support, including for schools and education. However, it is not clear if 'transformational support' is targeted only at current workers losing their jobs directly as a result of the transition. This could reinforce existing systemic fragilities and inequalities without more broad support.
- Identifies some of the existing and future skills, training and education gaps at regional level on the basis of objective and quality skills forecasts, or sets out a process to identify them - but focuses on a limited range of sectors or only on workers directly affected by the transition or who have already lost their jobs
  - Comments: Includes a dedicated section (a very good practice), but again it focuses mostly on what former miners can do.
- 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
- 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
- Does not consider social protection and inclusion measures, even if inequalities are recognised
  - Comments: One specific operation included on developing energy communities, including with a view to tackling energy poverty. These could be much improved.
- 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
- 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.



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: This should however be evaluated, in particular with regards to proposed biogas plants. An exclusion list, which also prevents investment in activities defined as significantly harmful activities under the EU Taxonomy, should also be introduced.



Foresees no investments in infrastructure which could directly or indirectly lead to greater greenhouse gas emissions

Comments: Biogas and cogeneration plant plans should be investigated to confirm this rating.



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 energy recovery is included as a potential type of operation envisaged. This should be excluded to avoid an undermining of the circular economy.



## 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: Revitalisation of former mining sites is planned, with utilities (Orlen, Tauron) as identified beneficiaries without clear indication of an evaluation of the polluter pays principle. Preferential plans are indicated as one tool, but grants are not excluded from the JTF. Loans, including under Pillar 2 JTF, may be preferable to grants in support to large enterprises.



## 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: It is not clear how financing will be coordinated or prioritised.



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: This is particularly problematic for investments in large enterprises. There is an indication of a mechanism to leverage private investment via a dedicated fund, but again, polluter pays measures are inadequate/non-existent.



## 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. Requirements for membership of the coordination body and composition of the membership body are clearly presented. Detailed information on meeting timing and regularity is provided, as well as detailed information on how, when and where relevant documents and information on process will be published in an accessible place, ideally including online tools.

Comments: It is not clear whether the process for identifying partners was transparent and open.



Clearly and comprehensively identifies stakeholders to be involved in the process, consistent with the groups identified in Article 3 of the European Code of Conduct on Partnership and a clear and justified description of their roles and status in the process



Concrete detail on stakeholder engagement plans (e.g. meeting and consultation schedules and arrangements), as well as provisions to address stakeholder capacity-building needs

AND the TJTP includes sufficient details on how stakeholders have or will be involved in the preparation, implementation, monitoring and evaluation of the TJTP and how their views and inputs were integrated into the final plan

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

Comments: No capacity building of stakeholders was indicated and it is likely certain stakeholders (notably incumbent industries) had a disproportionate influence on plan priorities. A detailed stakeholder engagement plan is included however and 13 working group meetings were held up to March 2021.

A communication plan has been put forward to encourage further engagement of stakeholders in implementation and monitoring and to secure project proposals from a wide range of stakeholders.

On monitoring: the plan notes that a Subcommittee for Western Malopolska will be established where interested entities will be able to express their opinions and submit comments. The composition of the Subcommittee will be representative of all key stakeholders in the region. The lists of stakeholders will be presented in the form of an open catalogue.



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 3 week-long consultation process.



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.

Comments: It is not clear whether social dialogue has taken place or is planned. Trade Unions have been engaged in development of the plan as they are included as members of the 'TPST team'



## 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

Comments: The plan notes that a Just Transition communication plan was developed in parallel to the development of the TJTP, which includes information and communication activities regarding the JTF in the region, in order to ensure that as many entities as possible submit project proposals and comments to implemented projects, as well as participate in the assessment of the impact of the implemented projects. measures to improve the socio-economic and environmental situation in the region.



## 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: Health data is included, and mining job multipliers are verified. However, further detail could be added, including on existing inequalities e.g. energy poverty and energy poverty risk, gender equality, access to green space, pollution.



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

**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.