



Assessment for Poland (śląskie)

Status: Draft Plan

Date of plan: 31.03.2021



Overall Plan Rating

This TJTP is not consistent with a just transition and should be rejected. A majority of principles for assessing the plan are rated as inconsistent with a just transition and drastic improvements are needed to ensure it delivers. The annex provides further detail about where improvements can be made to ensure a future version of the TJTP for this region delivers a just transition towards climate neutrality for all.

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 and 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



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



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



Provides no link to - or indication of need for consistency with - the NECP's objectives



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



Does not foresee or prioritise any measures to address, or indicators to measure, equality of opportunity effects



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



Does not consider social protection and inclusion measures, even if inequalities are recognised



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



—



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



Not enough information, but no explicit exclusion of fossil fuel investments



Identifies actions or possible activities to improve some biodiversity and environmental indicators. These activities and actions cover at least one of the following categories:

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

- ✘ 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



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.



Detail on the coordination body is lacking, as is detail on membership requirements and / or composition.

AND

there is no commitment to transparency and no mention of how, when and where relevant documents and information on process should be published

- 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.

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

- 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.

- —

● 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, but fails to identify measures for the specific NUTS 3 level regions concerned, focusing only on general or national-level measures
- 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

● 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
- 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.