



# **Fit to succeed?**

**An assessment of the Polish  
draft energy and climate plan**



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# Executive summary

As part of the European Union's 2030 climate and energy package, EU member states are required to develop energy and climate strategies to plan and to report on their 2030 climate and energy objectives. The LIFE PlanUp project (for more information, see Annex II), analyses the draft national energy and climate plans (NECPs) of five countries - Romania, Poland, Hungary, Italy and Spain.

Divided into four sections, this briefing assesses the draft plan of Poland. An overall score is provided at the end of the assessment (for more information, see Annex 1 on assessment criteria). The first section covers the scope of the plan, and the ambition and plausibility of its overall objectives. Poland published its draft NECP in January 2019, after the legal deadline. It follows the mandatory template as outlined in the Governance Regulation, however, the description of the individual dimensions, specific policies, programs and ways to achieve targets is limited.

According to the Polish government, the emission reduction targets are to be achieved mainly by improving efficiency of existing power plants and developing nuclear power capacity. The mentioned nuclear power plant is expected to help lower average emissions per MWh by 20% by 2030. In terms of energy production by coal, the NECP projects a very small change: coal's share is to decrease from the current 77% to 60%, but at the same time an increase in the total energy production volume is expected. As a result, the total amount of coal and lignite burned for energy purposes will remain almost unchanged compared to the current state.

The second chapter provides an in-depth analysis of the transport, buildings and agricultural sectors with regard to the proposed objectives and policy measures.

Regardless of the rising trend of transport emissions, the draft plan does not include a specific greenhouse gas emission (GHG) reduction target for transport. It does, however, foresee a 15.5% share of renewable energy in the transport sector in 2030, to be achieved by first-generation biofuels, which is not in line with the applicable EU legislation.

The Polish government seems to have no plans to address GHG emissions from agriculture as part of its efforts to meet the 2030 target, acknowledging that the emissions from agriculture could in fact increase by 2030.

The national target for the long-term renovation of housing stock is to bring the share of energy-efficient residential buildings in total housing stock to 70% in 2030 (compared to 58.8% in 2015) and to reduce the number of people living in substandard conditions due to overpopulation, poor technical conditions or lack of technical installations to 3.3 million in 2030 (from 5.36 million in 2011).

However, these sections of the draft plan lack specific policies, programs and ways to achieve goals.

As explained in the third section that looks at how the plan was developed, the Polish draft NECP was drafted without prior public consultation, failing to meet the basic principles of good governance processes and stakeholder engagement.

Finally, the last section focuses on the impact assessment of planned policies with regard to co-benefits such as job creation, air quality improvement and reduction of energy poverty.

The Polish NECP draft clearly indicates that in a scenario with more renewable energy sources, electromobility, energy efficiency and deeper reductions of GHG emissions, a large number of new jobs will be created. It is surprising that, given these considerations, the Polish government does not seem to want to reap the benefits of the employment potential of a shift towards a low-carbon economy. In terms of household emissions, air quality improvement will depend on the success of the "Clean Air" program, assuming that the programme will achieve a large-scale retrofitting of single-family houses and complete replacement of low-efficiency coal boilers by 2030. However, it should be emphasized that currently there is no legal framework that would explicitly encourage the exchange of heat sources fueled with solid fuels for renewable energy installations, heat pumps or even gas-fired sources.

The draft NECP also foresees a comprehensive public policy package aimed at solving the problem of energy poverty, that will protect the "vulnerable consumer". The list of specific activities, however, only covers developing the definition of energy poverty and monitoring energy poverty levels.

Overall, the Polish draft NECP scores very low. It is therefore paramount that in the final plan, the Polish government addresses these shortcomings and includes more effective policies to drive the decarbonisation of the transport, buildings and agricultural sectors. The country needs to take decisive steps to move away from its reliance on coal and focus on deploying renewable energy at scale and improving energy efficiency. The construction of the coal power plant and the new nuclear power plant foreseen by 2033 should be reconsidered. The role of renewable energy sources should be amplified and included in the energy mix much sooner than what is currently foreseen.

In order to guarantee public support for the policies, it is important to establish multi-level energy and climate dialogue before finalising the national energy and climate plan.

# **An assessment of the Polish draft national energy and climate plan**



# Scope, ambition and credibility

The Polish draft NECP, published in January 2019, follows the mandatory template as outlined in the Governance Regulation. However, the description of the five dimensions of the Energy Union, specific policies, programs and ways to achieve targets is limited. In addition, the document does not take stock of the current situation, which is a major failing given that Poland will probably miss its 2020 renewable energy sources (RES) target. Instead of addressing the country's GHG emissions, the Polish government largely envisages using flexibility mechanisms to reach its climate target in the period 2021-2030<sup>1</sup>.

## Greenhouse gas emission target

The Polish draft NECP does not include an economy-wide GHG reduction target nor a target for the sectors under the EU Emissions Trading System.

In the Climate Action Regulation (CAR) sectors (i.e. those not covered under the EU ETS), the NECP foresees a 7% GHG emission reduction by 2030, which is in line with the CAR. However, there is very little confidence that this target will be attained, and it is considered by the Polish government as an ambitious challenge.

Based on the current GHG emission projections (without NECP measures), transport emissions will continue to rise in the period 2021-2030 (a trend that has maintained since 2005). Moreover, the plan envisages the full use of all four types of flexibility mechanisms under CAR

The emissions reduction foreseen in the plan is to be achieved mainly by improving efficiency of power plants and the construction of a new nuclear power plant, which is presented as a key factor in lowering average carbon emissions per MWh by 20% by 2030. However, according to the NECP draft, the planned nuclear power plant will not start its production before 2033 in the most optimistic scenario. Currently, even this date seems unlikely to materialise. Even with the production of nuclear energy, the achieved decrease in average GHG emissions per MWh would anyway be mostly offset by the expected increase in total energy production from 171 TWh today to 206.8 TWh (i.e. by around 21%) by 2030.

It is also not clear how the (slow) increase of the share of renewable energy and the (slow) withdrawal of inefficient coal units will reduce emissions by as much as 20% per MWh compared to the current state, given that the draft NECP foresees that coal will still account for around 60% of energy production in 2030 and the building of offshore wind energy is likely to be delayed.

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<sup>1</sup> The following are considered loopholes in the Climate Action regulation: Offsetting from land use, land use change and forestry (LULUCF) activities; a) One-off use of ETS permits for compliance ; b) 'Safety reserve' giving certain Member States the option of using pre-2020 surplus to achieve their 2030 targets; c) Lower income Member States have the option to receive emission reductions achieved by other Member States, if the 2030 targets should be overachieved. Art. 19 Governance Regulation

## Renewable energy

Despite renewables being clearly identified as essential elements of the EU energy mix, the Polish draft considers the potential of renewable energy sources only to a very limited extent. The share of renewable energy in gross energy consumption, which the Polish NECP sets at 21% for 2030 (27% in electricity generation) is very low and the role of RES to support energy security too small.

The draft plan projects a very small change in the volume of energy production from coal. Coal's share is to decrease from the current 77% to 60%, but at the same time, an increase in the total energy production volume is expected. As a result, the total amount of coal and lignite burned for energy purposes will remain almost unchanged compared to current state.

The draft plan mentions the development of community-based renewable energy initiatives or so-called "energy clusters". However, this should be approached with caution, as in its current form the plan still presents administrative barriers and requires legislative changes to truly contribute to the development of community-based energy.

## Energy efficiency

The national target for improving energy efficiency by 2030 is set at 23% for primary energy consumption. This target is below the EU's overall energy efficiency target of 32.5 % in 2030 is, therefore, insufficient.

At present, the main mechanism in place in Poland aimed at supporting energy efficiency is the system of energy efficiency certificates, known as 'white certificates'<sup>2</sup>. Poland will continue to follow this system, setting out energy efficiency obligations, in the period 2021-2030.

A mechanism stimulating energy-saving behaviour is expected to be in place in the period 2021-2030. However, the shape and form of the regulation will be defined only later.

Criterion	Indicator	Indicator description	Score
Scope	Consistency with Energy Union Governance Regulation	Does the plan follow the mandatory template as outlined in the Governance Regulation? <sup>3</sup>	2/4 = to some extent

<sup>2</sup> The white certificate scheme was introduced on the basis of the Act on energy efficiency of 15 April 2011 (Journal of Laws z 2015, items 2167 and 2359 and of 2016, item 266), and was in place from 1 January 2013 to 30 September 2016 in accordance with this act. In 2016, a new act was adopted, i.e. the Act on energy efficiency of 20 May 2016 (Journal of Laws item 831), extending the scheme until 2020.

<sup>3</sup> <http://data.consilium.europa.eu/doc/document/PE-55-2018-INIT/en/pdf>

Criterion	Indicator	Indicator description	Score
Scope	Sectors/policies coverage	Does the plan include policies covering all required sectors?	1/4 = to a small extent
	Deadline	Has the plan been published on time/respecting deadline?	3/4 = yes, some delay

Criterion	Indicator	Indicator description	Score
Ambition/ plausibility	Greenhouse gas (GHG) emissions	Does the plan include an economy-wide GHG emissions reduction target for 2030?	0/4 = not at all
	Consistency among targets	Does the plan utilise consistent and harmonised GHG emission targets and related baselines?	0/4 = not at all
	Renewable energy	Does the plan include a national 2030 renewable energy target? <sup>4</sup>	1/4 = to a small extent
	Energy efficiency	Does the plan include a national 2030 energy efficiency target?	1/4 = to a small extent
	Alignment with 2050 decarbonisation objective	Is there a clear commitment to the Paris Agreement's objectives?	1/4 = to a small extent

Criterion	Indicator	Indicator description	Score
Consistency and credibility	Adaptation plan	Has an adaptation plan been devised? Is it reflected in the NECP? <sup>5</sup>	3/4 = yes, but limited
	Use of loopholes	Does the plan include use of loopholes in achieving GHG emission targets? <sup>6</sup>	0/4 = yes, full use/no alternative sought
	Policy projections Impact assessment	Does the plan use a strong and effective model used for the impact assessment of planned policies and measures?	0/4 = not at all

4 <https://www.ecofys.com/en/publications/national-benchmarks-for-a-more-ambitious-eu-2030-res-target/>

5 Art. 19 Governance Regulation: <http://data.consilium.europa.eu/doc/document/PE-55-2018-INIT/en/pdf>

6 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R0842&from=EN>

# In-depth analysis of sectors

## Transport

Based on the current greenhouse gas (GHG) emission projections (with no additional measures), transport emissions will continue to rise in the period 2021-2030 (a trend that has maintained since 2005).

According to the impact assessment based on the measures listed in the draft plan (Annex II of the NECP) a slight decrease in transport emissions is expected. However, it is doubtful whether this will be achieved given the weak measures indicated in the plan.

The plan foresees a 15.5% share of renewable energy sources in transport in 2030 achieved by first-generation biofuels. However, according to the EU legislation, the levels of 1st generation biofuels (food crop-based) should be frozen at those of 2020 and never higher than 7% - therefore other sources are needed to reach that target. According to the EU's Renewable Energy Directive (REDII), Member States must meet a target of advanced biofuels of 3.5% by 2030, for which Poland is planning to increase the use of such fuels. However, the only mandatory EU target for renewables in transport is up to 7% advanced fuels, therefore setting a national target of 15.5% risks that a lot of unsustainable feedstocks will be used (i.e. first generation biofuels).

At the same time, the plan mentions subsidies for advanced biofuels but it is not clear what role these will have and how they will be resourced.

The draft NECP foresees a reduction of CO<sub>2</sub> emissions in passenger cars and light vans of only 30% by 2030 compared to 2021, which is lower than the 37.5 % and 31% as required by the applicable EU regulation. At the same time, the plan does not mention heavy-duty vehicles, for which there are specific CO<sub>2</sub> standards set at the EU level.

Electromobility is considered one of the most important measures to reduce emissions. However, its implementation remains unclear due to the lack of details on policies, measures and sources of financing. At the same time, the overall emissions reduction potential of electromobility hinges on the successful decarbonisation of the power sector.

Poland's effort to develop electromobility is expected to result, in 2020, in 50,000 electric vehicles, 400 quick-charging points and 6,000 regular charging points. By 2025, the government expects there to be around one million electric vehicles in circulation.

The NECP also predicts an increase in the number of liquefied natural gas (LNG) and compressed natural gas (CNG) fueled vehicles, including the construction of four installations for gas bunkering of ships on the Polish coast. The latter is a negative development, since CNG and LNG are fossil fuels and such infrastructure investments lock in carbon emissions for decades to come. Poland should rely more on renewable sources.

The Polish draft NECP emphasises the development of an inland waterway transport but not enough attention is paid to the development and improvement of rail infrastructure. Despite the claim to shift the transport from road to rail (both passenger and freight), the NECP does not specify any policies, measures or source of financing that could realistically trigger this change. Furthermore, there is no mention of addressing emissions from the aviation sector. Noteworthy is also the absence of any measure tackling imports of used combustion engine vehicles to Poland, and their impact on air quality and prospects of electromobility.

Finally, the plan lacks a clear vision for sustainable urban mobility, such as low-emission zones or effective public transport. There is a vague mention of encouraging citizens to walk more, but no details are provided.

Criterion	Indicator	Indicator description	Score
Sectoral policy: Transport	Alignment/plausibility with 2030 goals	Are transport policies included in the plan plausible to reach 2030 national climate goals? <sup>7</sup>	0/4= not at all
	Inclusion of long-term strategy	Do plans include transport policies beyond 2030?	0/4= not at all
	Consistency with EU legislation	Are transport policies consistent and in line with EU legislation? <sup>8,9,10,11</sup>	1/4 = to a small extent
	Infrastructure	Are proposed infrastructure investments aligned with the long-term climate goals?	1/4 = to a small extent
	Policies beyond or additional to EU requirements	Does the plan include policies that are additional or go beyond EU requirements?	1/4 = to a small extent

7 [https://ec.europa.eu/clima/policies/effort/proposal\\_en](https://ec.europa.eu/clima/policies/effort/proposal_en)

8 [https://eur-lex.europa.eu/resource.html?uri=cellar:609fc0d1-04ee-11e8-b8f5-01aa75ed71a1.0001.02/DOC\\_1&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:609fc0d1-04ee-11e8-b8f5-01aa75ed71a1.0001.02/DOC_1&format=PDF)

9 [https://eur-lex.europa.eu/resource.html?uri=cellar:3eb9ae57-faa6-11e6-8a35-01aa75ed71a1.0007.02/DOC\\_1&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:3eb9ae57-faa6-11e6-8a35-01aa75ed71a1.0007.02/DOC_1&format=PDF)

10 [https://ec.europa.eu/transport/themes/urban/vehicles/directive\\_en](https://ec.europa.eu/transport/themes/urban/vehicles/directive_en)

11 [https://ec.europa.eu/transport/themes/urban/cpt\\_en](https://ec.europa.eu/transport/themes/urban/cpt_en)

# Recommendations

- Include a greenhouse gas emission reduction objective specific for the transport sector, to be able to track actual emission reductions in such an emitting sector.
- Reduce the target for renewables in transport to the binding target for advanced fuels (7%) to avoid the use of unsustainable biofuels.
- Make sure the level of first-generation biofuels stays at 2020 levels, as any growth is not in line with the EU RED II.
- Include measures to reduce emissions in the aviation and shipping sectors, as they are currently barely covered in the plan.
- Make sure the CO<sub>2</sub> reduction targets for light-duty vehicles are in line with the CO<sub>2</sub> standards for light-duty vehicles as agreed at the EU level. Include CO<sub>2</sub> emission reduction goals for heavy-duty vehicles as well, in line with the EU legislation.
- Include more details on all measures outlined for transport as there is no information in terms of objectives, investments and impacts.
- Outline policies, measures and source of financing that will improve rail infrastructure.
- Include a plan to encourage sustainable urban mobility, such as low-emission zones or effective public transport.

## Buildings

The Polish draft NECP does not include a specific target to address greenhouse gas emissions from buildings, the share of renewable energy or energy savings. Concerning the share of renewable energy for heating and cooling, an estimated annual increase of 1-1.3 percentage points by 2030 is presented without further details or binding targets.

The targets section of the energy efficiency dimension sets out two goals for increasing the percentage of buildings with higher energy parameters by 2030:

- Increasing the share of insulated residential buildings in the total housing stock to 70% in 2030 (from 58.8% in 2015),
- Reducing the number of people living in substandard conditions to 3 300 000 in 2030 (from 5 360 000 in 2011).

Furthermore, the existing obligations for new buildings to achieve nearly-zero energy performance are explained. Since the beginning of 2019, new buildings occupied by public authorities and owned by them have to be nearly zero-energy buildings, and before the end of 2020, all new buildings should be almost zero-energy. On a similar note, the NECP refers to the annual renovation target of 3% of the total heated or cooled area in government-owned and -occupied buildings as set by the Buildings Directive. According to the plan, this is meant to be implemented with an alternative measure but the plan gives no further details as to what the measure might be.

Concerning the long-term strategy for the renovation of the building stock, the draft NECP does not provide further information.



The sections lack specific policies, programs and ways to achieve goals. There are also no specific provisions regarding the planned change of the heat market model and tariff policy - neither the direction of this change nor the actions to be taken to implement it have been given.

The draft NECP indicates that zoning plans of cities are to take into account the concepts of green and blue infrastructure, and a system of aeration corridors, and should determine which sources of heat are permitted for heating buildings (some rules in this respect have already been implemented in the form of “anti-smog resolutions” at the local governmental level), for increasing resilience and improving the functioning of ecosystems.



Moreover, an important element concerns natural regeneration, including the restoration of degraded green areas and water reservoirs with their original functions, with particular emphasis on the replacement of sealed soil surfaces with permeable surfaces.

At the same time, it needs to be emphasised again that the NECP draft does not contain precise descriptions of pathways to achieve those objectives, specific measures or sources of financing.

Some good steps have been identified for urban planning, but like in other areas, no quantitative targets and no timeframes have been set, nor have responsible public authorities been identified. Meanwhile, works on the Urban Planning Code, which would be an important instrument in this regard, are in a limbo, with the government actually seeking to deregulate the area.

Criterion	Indicator	Indicator description	Score
Sectoral policy: Buildings	Alignment/plausibility with 2030 goals	Are buildings policies included in the plan plausible to reach 2030 national climate goals?	2/4 = to some extent

Criterion	Indicator	Indicator description	Score
Sectoral policy: Buildings	Inclusion of long-term strategy	Do plans include buildings policies beyond 2030?	0/4 = not at all
	Consistency with EU legislation	Are buildings policies consistent and in line with EU legislation? <sup>12 13 14</sup>	1/4 = to a small extent
	Infrastructure	Are proposed infrastructure investments aligned with the long-term climate goals? <sup>15 16</sup>	1/4 = to a small extent
	Policies beyond or additional to EU requirements	Does the plan include policies that are additional or go beyond EU requirements?	0/4 = not at all

## Recommendations

- Apply an integrated approach to buildings which includes improving energy efficiency, promoting behavioral change, introducing renewable energy micro-installations and preventing energy poverty.
- Include a clear link between energy efficiency measures and their related budget, timeline and governance structure. This would allow a solid assessment of the feasibility and expected impact of the policies.
- Include a detailed breakdown of investment needs by sector and within the buildings sector in residential, public and commercial to give a better overview and to allow for better benchmarking.
- Ensure the harmonisation and coordination between energy efficiency programmes established at the national level and those established through EU-funded programmes. This will avoid overlapping of funds and ensure that targeted measures and public investments are developed for the low-income households in the 20th income percentile and lower.
- Outline policies, measures and sources of financing that will enable the achievement of the renovation targets set for residential and government-owned buildings.
- With Poland already using a significant amount of biomass, take steps to tackle the impacts on air pollution and the availability of sustainable biomass.

12 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L0844&from=EN>

13 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52016PC0761&from=EN>

14 [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52016PC0767R\(01\)&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52016PC0767R(01)&from=EN)

15 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32012L0027&from=EN>

16 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L0844&from=EN>

# Agriculture

The Polish NECP does not include any greenhouse gas reduction target for agriculture, acknowledging that the sector's emissions may increase instead by 2030.



It seems clear that the Polish government does not intend to address emissions from the sector as part of its efforts to reach the 2030 climate targets.

In terms of agricultural policy measures, there is also very little information in the draft NECP. The plan only mentions the following vague references, which have no budget associated with them, and which in some cases refer to the current environmental law, meaning that their enforcement is obligatory:

- The natural environment, agriculture and forestry as priorities for research and innovation.
- The sector's high potential as a source of biomass and raw materials for agricultural bio-gas production as a tool to achieve renewable energy goals.
- The development of forestry adaptation programs, taking into account the conditions and needs of industry, energy, agriculture, tourism and recreation, regional development, biodiversity, but there are no specific targets or dates associated with them.
- Measures that are part of the environmental law: birds and habitat directive, water framework directive and the nitrate directive.
- Investment support in the rural area via Rural Development Programme, with a focus on adaptation more than on mitigation.
- Early warning systems in the rural area for climate risk.

The draft NECP includes a detailed explanation of how Poland can account for the land use, land use change and forestry (LULUCF) under the EU rules. Emissions related to forest biomass used for energy purposes (about 20% of the biomass in total, mainly roundwood from forests and tree plantings and by-products from wood processing processes) are reported and accounted for, as the result of forest biomass losses from forest land.

The agricultural policies identified in the NECP include a nitrogen fertiliser programme and plans to develop more biomass and biogas, as well as an experimental programme to develop new forestry practices to boost absorption. However, actual LULUCF removals are expected to decline by around 50% between 2015 and 2030. Historically, GHG removals in the LULUCF sector decreased significantly between 2005 and 2010. In subsequent years, the rate of decline in absorption slowed down. Poland considers absorption by forests as the hallmark of its emissions reduction policies.

While the draft NECP promotes agricultural biogas plants, which could have potential in terms of increasing the share of renewable energy and enabling community energy, any investment in biogas plant should not lead to any rebound effects such as, an increase of livestock density in the area.

The draft contains some other general mentions of infrastructure that is expected to stimulate innovations in climate change adaptation, however, they are very unspecific.

With regard to climate change adaptation, the NECP emphasises that rural areas are particularly vulnerable due to the impact of climate change on agricultural and forestry activities. However, the only adaptation measures mentioned in the plan concern protecting the population in crisis situations and adapting agricultural, fishing and forestry production. As part of these planned activities, local monitoring and warning systems for threats are to be established by 2030 along with “appropriate” organisational and technical adaptation to climate change.

Criterion	Indicator	Indicator description	Score
Sectoral policy: Agriculture	Alignment with 2030 goals	Are agricultural policies included in the plan plausible to achieve 2030 climate goals? <sup>17</sup>	0/4 = not at all
	Inclusion of long-term strategy	Do plans include agricultural policies beyond 2030?	0/4 = not at all
	Consistency with EU legislation	Are agricultural policies consistent and in line with EU legislation? <sup>18</sup>	2/4 = to some extent
	Infrastructure	Are proposed infrastructure investments aligned with the long-term climate goals?	2/4 = to some extent
	Policies beyond or additional to EU requirements	Does the plan include policies that are additional or go beyond EU requirements?	0/4 = not at all

<sup>17</sup> [https://ec.europa.eu/clima/policies/effort/proposal\\_en](https://ec.europa.eu/clima/policies/effort/proposal_en)

<sup>18</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R0841&from=EN>

# Recommendations

- Acknowledge the sector's significant potential to contribute towards reaching the CAR targets, and outline policies, measures and available funding sources in the energy and climate plan in order to reduce agricultural emissions.
- Ensure that:
  - agricultural mitigation measures cover all sources of emissions from the sector  
all measures are environmentally proofed (air - water - biodiversity)
  - specific budget is allocated for each measure and the number of farmers expected to enroll is put forward.

## Transparency and public participation

The Polish draft NECP was submitted to the European Commission in January 2019, slightly after the legal deadline, and was published on the website of the Ministry of Energy. During the drafting period, the Polish government provided no opportunities for consultation. Moreover, the draft plan does not contain any details on how the document was drafted.

A public consultation was carried out after the publication of the draft plan, between the 15th January and the 18th of February 2019. However, considering the size of the document and its annexes, the one-month period is not deemed enough for the public to provide meaningful feedback.

A major shortcoming in the draft NECP, however, is the absence of any indication of an iterative, specific multi-level energy and climate dialogue on the NECP. A multi-stakeholder dialogue that includes all governance levels, would ensure more transparency and increase support for the final plan.

Criterion	Indicator	Indicator description	Score
Transparency	Public participation	Does the plan include early and effective opportunities for public participation?	2/4 = no, public consultation but too short time to provide feedback

Criterion	Indicator	Indicator description	Score
Transparency	Publication	Is the draft plan publicly available?	1/4 = yes, but for a limited period of time
	Multilevel dialogue	Does the plan cater for a multilevel dialogue where local authorities, NGOs, business, investors and the general public can actively engage and discuss the climate and energy policy scenarios, and review progress?	0/4 = no provision for dialogue

## Recommendations

- Publish a summary of stakeholder contributions to public consultation.
- Make the timeline for the remaining NECP process publicly available, so that citizens and stakeholders can receive early and effective information on how they can contribute.
- Organise a broad public consultation following the European Commission recommendations in June.
- Organise regional gatherings to discuss the NECP with local and regional authorities (LRAs), civil society organisations (CSOs), and other stakeholders in the 2nd half of 2019.
- Make use of existing local energy and climate initiatives, such as the Covenant of Mayors, to gather the potential contribution of LRAs to the NECP.
- Establish multi-level energy and climate dialogue for the finalisation of the NECP, making use of existing formats like working groups, task force or other consultative bodies that involve all stakeholders; provide the dialogue with an administrative structure to ensure its duration and its involvement in regularly following up on the NECP implementation from 2020 onwards.

# Co-benefits

## Air quality

In terms of households' emissions, air quality improvement will depend on the success of the "Clean Air" program, assuming the programme will achieve a large-scale retrofitting of single-family houses and complete replacement of low-efficiency solid fuel boilers by 2030. However, it should be emphasised that currently there is no legal framework that would explicitly encourage the replacement of heat sources fueled with solid fuels for renewable energy installations.

## Energy poverty

The draft NECP foresees the creation of a comprehensive public policy aimed at solving the problem of energy poverty, in order to protect "vulnerable consumers". The list of specific activities, however, only covers the definition of energy poverty and monitoring energy poverty levels. These are indeed necessary actions, but far insufficient to tackle this issue effectively.

## Job creation

The scenario described in the NECP envisages the creation of about 20,000 new jobs by 2020 and 100,000 jobs in the decade 2030 - 2040. These figures, however, are difficult to assess because they refer to the so-called "reference scenario" and not the current situation.

Nevertheless, the draft NECP clearly indicates that in a scenario with more renewable energy sources, electromobility, energy efficiency and deeper reductions of GHG emissions, a much larger number of new jobs will be created. However, it is surprising that the employment potential of a shift towards a low-carbon economy is not concretely considered as an opportunity.

Criterion	Indicator	Indicator description	Score
Co-benefits	Air quality	Do proposed policies improve air quality?	0/4 = no effect predicted
	Energy poverty	Do proposed policies reduce energy poverty?	3/4 = moderate improvement
	Job creation	Does the plan include investments in low-carbon industries, thus promoting job creation in these industries?	1/4 = almost insignificant increase

# Recommendations

- Carry out an evaluation on the employment potential of a shift towards a low-carbon economy.
- Detail specific measures to address the problem of energy poverty for vulnerable consumers.
- Put forward policies that encourage the replacement of heat sources fueled with solid fuels energy installations.

# Overall score and conclusions

Criteria	Weight	PL points
Scope	5	6/12
Ambition	20	3/20
Consistency and credibility	20	3/12
Transport policies	10	3/20
Buildings policies	10	4/20
Agriculture policies	10	4/20
Transparency	20	5/12
Co-benefits	5	4/12

**Total score: 24%**

The Polish draft NECP scores very low on all the criteria. The ambition of its climate and energy objectives and the transparency of the NECP process require major improvement. Furthermore, there is a need for a strong commitment to stopping dependency on coal. The national 2030 target of 7% reduction of greenhouse gas emissions in the Climate Action Regulation sectors is considered by the government as an ambitious challenge. Thus, there is very little confidence that this target will be attained.

With regard to sectoral objectives and policy measures, the government needs to seriously reconsider policies and measures to be put in place. As transport is the biggest emitter among the CAR sectors, stronger focus on public transport, modal shift and rail infrastructure would contribute to effectively tackling the rising emissions. The agricultural sector's contribution towards meeting the goals of the CAR should be reevaluated, and the government should put forward policies and measures to reduce the sector's emissions. With regard to the buildings sector, the plan lacks specific policies, programs and ways to achieve set goals. In particular, specific provisions regarding the planned change of the heat market model and tariff policy should be further detailed.

While a public consultation was conducted on the draft plan after it was published, it does not include any mention of a future multilevel dialogue. A more transparent process where all relevant stakeholders and the general public are consulted on the country's climate objectives and planned policies should be set up as it would ensure greater support and commitment from all parties involved.

The Polish NECP should be improved. The country needs to take decisive steps to move away from its reliance on coal and focus on renewable energy deployment at scale. More ambition and stronger policies are needed to tackle emissions from the transport, buildings and agricultural sectors. It is of paramount importance that in the development of the final plan, Poland increases its commitment to 2030 climate objectives, includes long-term goals and involves all stakeholders in a more transparent process.

# Annexes



# Assessment criteria

## Methodology

To develop the used set of criteria, we conducted desk research and looked mainly at two examples: the criteria used in the LIFE Maximiser Project and the criteria developed by Climate Action Network (CAN) Europe.

The LIFE Maximiser project analysed EU Member States' 2050 low-carbon development strategies (LCDS). For this purpose, LIFE Maximiser developed a complex technical tool<sup>19</sup> to assess and score the quality (in terms of substance, credibility and process) and status of the EU Members' LCDS. The tool was broken down into 10 criteria, and based on these criteria, further into 48 indicators and sub-indicators. The overall approach used by LIFE Maximiser was normative, meaning that their tool was designed with the primary purpose to measure what elements should be included in the LCDS they analysed. Of the 10 criteria, the most relevant for our work were: ambition, scope, integration, public transparency and process transparency.

The guidelines developed by CAN Europe (part 1<sup>20</sup> and part 2<sup>22</sup>) are intended to serve as a tool to empower civil society organisations across Europe to engage actively and effectively in the process of the development of the NECPs; to demand ambitious targets and policies from their governments; to check on the accuracy and coherence of governmental proposals; and to hold them accountable for what they have committed to do. They are meant to provide an understanding of the plans and how they work. The guidelines are composed of five pillars, one per topic analysed. Each pillar is underpinned by a set of criteria and indicators. For our work, we looked at all the pillars and selected the relevant criteria and indicators.

Additionally, we developed sector-specific indicators to analyse sectoral policies that are the focus of our project. Each sector - agriculture, buildings and transport - was given a set of indicators that explore the ambition level of sectoral policies, their alignment with EU legislation and the level of their infrastructure investment.

## User manual

The result of this methodology was a set of eight criteria, underpinned by a total of 38 indicators. In addition, a scaling system was introduced to measure and evaluate the indicators.

The participatory assessments shall be conducted on the basis of the eight criteria listed below.

19 <https://static1.squarespace.com/static/57050297356fb0e173a11732/t/5b3107a96d2a73fc7bbaaa28/1529939892483/final+tool+concept+Maximiser+formatted.pdf>

20 <https://docs.google.com/document/d/1A4qGHLX2ThnlwlrnkHjJHRZTdh0jghlV6PxUjqxDzI0/edit>

21 <https://docs.google.com/document/d/1tLOHUF1T0gYWPMU7SeBpybw1AvPwH3L-TLGPmbozDnA/edit#heading=h.2nusc19>

These criteria should be used to provide a general indication of the strengths and weaknesses of the specific NECP section on a scale from 0 to 4. The score should be properly justified in a dedicated paragraph.

These criteria, and related indicators, rely exclusively on existing data provided within the NECPs. Lack of data or sections in the NECPs should be highlighted but not compensated for. The lack of details and data shall instead be translated into concrete policy asks to be submitted to Member States in public consultations.

When impact assessment of policies and measures is missing in the NECP, the following national projections may be used to explain the point assigned to each indicator: Climate and Energy country profiles.

### Assessment criteria template

Criterion	Indicator	Indicator description	Score
Scope	Consistency with Energy Union governance regulation	Does the plan follow the mandatory template as outlined in the Governance Regulation?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent
	Sectors/policies coverage	Does the plan include policies covering all required sectors?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent
	Deadline	Has the plan been published on time/respecting deadline?	0 = no publication 1 = considerable delay 2 = no, reasonable delay 3 = yes, some delay 4 = yes, no delay

Criterion	Indicator	Indicator description	Score
Ambition/plausibility	Greenhouse Gas (GHG) emissions	Does the plan include an economy-wide GHG emissions reduction target for 2030?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent
	Consistency among targets	Does the plan utilise consistent and harmonised GHG emission targets and related baselines?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent

<b>Criterion</b>	<b>Indicator</b>	<b>Indicator description</b>	<b>Score</b>
Ambition/ plausibility	Renewable energy	Does the plan include a national 2030 renewable energy target?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent
	Energy efficiency	Does the plan include a national 2030 energy efficiency target?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent
	Alignment with 2050 decarbonisation objective	Is there a clear commitment to the Paris Agreement's objectives?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent

<b>Criterion</b>	<b>Indicator</b>	<b>Indicator description</b>	<b>Score</b>
Sectoral policy: Transport	Alignment/plausibility with 2030 goals	Are transport policies included in the plan plausible to reach 2030 national climate goals?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent
	Inclusion of long-term strategy	Do plans include transport policies beyond 2030?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent
	Consistency with EU legislation	Are transport policies consistent and in line with EU legislation?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent
	Infrastructure	Are proposed infrastructure investments aligned with the long-term climate goals?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent

<b>Criterion</b>	<b>Indicator</b>	<b>Indicator description</b>	<b>Score</b>
Sectoral policy: Transport	Policies beyond or additional to EU requirements	Does the plan include policies that are additional or go beyond EU requirements?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent

<b>Criterion</b>	<b>Indicator</b>	<b>Indicator description</b>	<b>Score</b>
Sectoral policy: Buildings	Alignment/plausibility with 2030 goals	Are buildings policies included in the plan plausible to reach 2030 national climate goals?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent
	Inclusion of long-term strategy	Do plans include buildings policies beyond 2030?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent
	Consistency with EU legislation	Are buildings policies consistent and in line with EU legislation?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent
	Infrastructure	Are proposed infrastructure investments aligned with the long-term climate goals?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent
	Policies beyond or additional to EU requirements	Does the plan include policies that are additional or go beyond EU requirements?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent

<b>Criterion</b>	<b>Indicator</b>	<b>Indicator description</b>	<b>Score</b>
Sectoral policy: Agriculture	Alignment/plausibility with 2030 goals	Are agricultural policies included in the plan plausible to reach 2030 national climate goals?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent

<b>Criterion</b>	<b>Indicator</b>	<b>Indicator description</b>	<b>Score</b>
Sectoral policy: Agriculture	Inclusion of long-term strategy	Do plans include agricultural policies beyond 2030?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent
	Consistency with EU legislation	Are agricultural policies consistent and in line with EU legislation?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent
	Infrastructure	Are proposed infrastructure investments aligned with the long-term climate goals?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent
	Policies beyond or additional to EU requirements	Does the plan include policies that are additional or go beyond EU requirements?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = to a great extent

<b>Criterion</b>	<b>Indicator</b>	<b>Indicator description</b>	<b>Score</b>
Transparency	Public participation	Does the plan include early and effective opportunities for public participation?	0 = no opportunities/form of consultation 1 = no only limited and not public 2 = no, public consultation but too short time 3 = yes, several opportunities 4 = yes, several opportunities and ample time to participate
	Publication	Is the draft plan publicly available?	0 = no 1 = yes, 6 or more months delay 2 = yes, 2-3 months delay 3 = yes 4 = yes, plus summary in English

<b>Criterion</b>	<b>Indicator</b>	<b>Indicator description</b>	<b>Score</b>
Transparency	Multilevel dialogue	Does the plan cater for a multilevel dialogue where local authorities, NGOs, business, investors and the general public can actively engage and discuss the climate and energy policy scenarios, and review progress?	0 = no provision for dialogue 1 = very limited effort 2 = only limited to very few stakeholders 3 = yes, some effort in including multiple stakeholders and gather input 4 = yes, effective dialogue and high engagement

<b>Criterion</b>	<b>Indicator</b>	<b>Indicator description</b>	<b>Score</b>
Consistency and credibility	Adaptation plan	Has an adaptation plan been devised? Is it reflected in the NECP?	0 = no 1 = no, unclear adaptation strategy 2 = yes, but not clearly reflected in the plan 3 = yes, but limited 4 = yes, fully developed and integrated
	Use of loopholes	Does the plan include use of loopholes in achieving GHG emission targets?	0 = yes, full use/no alternative sought 1 = yes, large use 2 = yes, most opportunities used 3 = yes, but limited 4 = no loopholes used
	Policy projections Impact assessment	Does the plan use a strong and effective model used for the impact assessment of planned policies and measures?	0 = not at all 1 = to a small extent 2 = to some extent 3 = to a moderate extent 4 = yes, very strong and detailed model used

<b>Criterion</b>	<b>Indicator</b>	<b>Indicator description</b>	<b>Score</b>
Co-benefits	Air quality	Do proposed policies improve air quality?	0 = no effect 1 = minimal effect 2 = small improvement 3 = moderate improvement 4 = great improvement

Criterion	Indicator	Indicator description	Score
Co-benefits	Energy poverty	Do proposed policies reduce energy poverty?	0 = no effect 1 = minimal effect 2 = small improvement 3 = moderate improvement 4 = great improvement
	Job creation	Does the plan include investments in low-carbon industries, thus promoting job creation in these industries?	0 = no investment 1 = almost insignificant increase 2 = small increase 3 = moderate increase 4 = great investment and substantial job growth

The table below summarises the weight that each criterion has on the overall score of the NECP.

Given the difference in importance of the criteria in our analysis, a weight system helps us quantify this difference and ensure that it is reflected in the overall score of the NECP. For example, while the consistency between the NECP document and template provided in the Governance regulation is important, the plausibility of the policies listed, the ambition level in targets set for each sector and the dialogue with multiple stakeholders in the development of the NECP are much more relevant and important to the objective of this exercise, and therefore should be given more prominence in the overall assessment.

Hence, a good performance in particular in these criteria should be graded higher in the overall assessment of climate and energy policies.

Criteria	Weight	Points
Scope	5	12
Ambition	20	20
Consistency and credibility	20	12
Transport policies	10	20
Buildings policies	10	20
Agriculture policies	10	20
Transparency	20	20
Co-benefits	5	12

**A NECP should obtain at least 65 points to be considered a good plan.**

# LIFE PlanUp project description

LIFE PlanUp supports the shift to a low-carbon and resilient economy through the development and implementation of effective and ambitious national 2030 energy and climate plans (NECPs) in Hungary, Poland, Romania, Spain and Italy. A key objective of the PlanUp project is to strengthen the climate and energy governance processes in these countries by increasing the involvement of local and regional authorities (LRAs) and civil society organisations (CSOs) in the development and implementation of the NECPs.

Aiming to support the five target countries in strengthening their national NECPs and to engage in their development, a core action of the PlanUp project is the participatory assessment of draft and final NECPs. In order to conduct meaningful and consistent analyses for all five Member States, we developed a set of assessment criteria that will guide the assessments and ensure their comparability.

# LIFE PlanUp

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Expert group: Agnese Ruggiero, Elisa Martellucci, Kaisa Amaral, Joanna Furmaga, Izabela Zygmunt, Powel Sulima, Cristina Mestre, Stephan Piskol, Roland Joebstl, Berenice Dupeux and David Donnerer.

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It is the overarching goal of the LIFE + programme to act as a catalyst for changes in policy development and implementation by providing and disseminating solutions and best practices to achieve environmental and climate goals, and by promoting innovative environmental and climate change technologies.

The information and views set out in this report are those of the author(s) and do not necessarily reflect the official opinion of the European Commission.

## Further Information

Agnese Ruggiero

Policy Officer

Carbon Market Watch

[agnese.ruggiero@carbonmarketwatch.org](mailto:agnese.ruggiero@carbonmarketwatch.org)

Rue d'Albanie 117, B-1060 Brussels, Belgium, Belgium | Tel: +32 2 335 36 66

[www.carbonmarketwatch.org](http://www.carbonmarketwatch.org) | [@carbonmrktwatch](https://www.facebook.com/carbonmrktwatch) | fb: Carbon Market Watch



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