



POLAND

Ensuring a role for old king coal and no assessment of investment needs

Public participation			Level of ambition			
Early publication	Independent review	Public consultation	Energy efficiency	Renewable energy sources	Fossil fuels phase-out	Investment needs
C	C-	C-	C	C	D	C
Published on 15 January 2019, after it had been submitted to the Commission	No SEA or any other expert review, no multi-level dialogue with stakeholders prior to submission, consultations conducted after submission, unclear how comments will be taken into account.	NECP drafted without a wide participatory process, only actors involved in the drafting were government ministries and agencies	Low target (23 per cent) not reflecting EE potential gains	Modest target (21 per cent), relying mainly on biomass, without any sustainability safeguards	Volume of coal consumed expected to remain unchanged	Comprehensive assessment of investment needs, focusing solely on electricity generation

Poland's draft NECP was published and presented for public consultation on 15 January 2019, after it had been submitted to the Commission. The consultation did not meet the legal requirements of the SEA directive, as no SEA was conducted for the plan. The NECP was drafted without a wide participatory process, as the only actors involved in the drafting were government ministries and agencies. Therefore, the plan fails to reflect the viewpoints and contributions of important stakeholders like businesses, cities, municipalities and civil society.

The NECP does not outline an economy-wide GHG emissions target, and the proposals in the plan are expected to reduce Poland's overall GHG emissions only marginally. According to projections in the NECP, Poland's GHG emissions will decrease from 376.2 million tonnes in 2010 to 366.5 million tonnes in 2030. The draft NECP presents the development of nuclear energy as a key decarbonisation measure, but even in the most optimistic scenario the nuclear power plant will not go online before 2033 and its economic viability is questionable.

The **2030 renewables target is a modest 21 per cent** (27 per cent in the electricity sector), despite a much larger, untapped potential in the onshore wind and photovoltaic sectors, which the draft ignores. Worryingly, the plan seems overly reliant on biomass, including forest roundwood, and 'renewable municipal waste' for renewable energy production (especially in the

heating sector). The plan does not include any sustainability safeguards for biomass.

The energy efficiency target of 23 per cent fails to reflect the sector's large, untapped potential, especially in residential buildings and transport, and the fragmented policies proposed in the NECP may anyway be insufficient to achieve this small target.

Far from establishing a **coal phase-out date**, the draft NECP provides coal with a central position in Poland's energy mix: coal's share in electricity generation is expected to decrease from the current 77 per cent to about 60 per cent in 2030, but the volume of coal generation is expected to remain largely unchanged as total energy demand is projected to increase considerably. That is despite the challenges of growing coal imports and rising emissions costs, which the NECP fails to address. The draft NECP also makes no provisions for a just transition of coal regions.

The draft NECP does not offer a comprehensive assessment of **investment needs**, focusing on investments in electricity generation but leaving out adaptation, energy efficiency in buildings, auxiliary infrastructure needed to enable offshore wind development, mitigation in the non-ETS sectors and research and innovation. As such it cannot provide useful guidance in programming EU funds after 2020.