



Territorial Just Transition Plans for Polish Coal Regions

The **Alliance of Associations Polish Green Network** is a nationwide public benefit organization, bringing together environmental organizations operating in major Polish cities. Our goal is to support social and economic development that is consistent with the needs of environmental and climate protection, social justice and respect for human rights. We operate in the fields of just transition, community-based energy, as well as the planning, implementation and monitoring of public funds.

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Adam Jaroński (Adamów open-pit mine in Eastern Wielkopolska)

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Climate change and the European Green Deal

The European Union intends to become a climate-neutral continent by 2050. This is in line with the recommendations of the United Nations Intergovernmental Panel on Climate Change (IPCC), which in its alarming 2019 and 2021 reports¹ has confirmed that **immediate and global reductions in greenhouse gas emissions are needed to reduce the risk of climate catastrophe**. This means countries must adopt ambitious reduction targets for the coming years and decades. In May 2021, EU representatives adopted an agreement to **increase the Union's greenhouse gas emissions reduction target from 40 per cent to at least 55 per cent by 2030 compared to 1990**.²

Responding to the challenges of global warming and environmental degradation, the European Union has developed an action plan – the European Green Deal. It aims to help transform the EU into a modern, resource-efficient and competitive economy, reaching zero net greenhouse gas emissions by 2050. **The Green Deal is also supposed to support countries in alleviating the effects of the COVID-19 pandemic-fuelled crisis.** It will be funded with **one-third of the EUR 1.8 trillion** investment in the NextGenerationEU Recovery Plan and the EU's seven-year budget.

The **European Green Deal assumes that no region will be left without support with regard to the green transition process.** This applies especially to coal areas, whose communities will be most affected by the coal phase-out process. This is to be achieved through the **Just Transition Mechanism (JTM), which is expected to provide the most affected regions in Europe with at least EUR 65-75 billion over the period 2021-2027.**

Just Transition Fund

The Just Transition Mechanism is intended to be a key tool and safety net to ensure that the transition to a climate-neutral economy takes place in a just manner, leaving no one behind. Its cornerstone is the Just Transition Fund to support coal regions in their transition and to mitigate its socio-economic impact. It is implemented in line with the Cohesion Policy framework, which is the EU's main policy to reduce economic disparities between regions. The Fund will be provided with EUR 17.5 billion (in 2018 prices; EUR 19.3 billion in current prices), of which EUR 7.5 billion will be financed under the EU budget for 2021 to 2027, while the remaining EUR 10 billion will be external revenues assigned from the Recovery and Resilience Facility (and as such will be made available from 2021 to 2023). The Fund's aim is to mitigate the socio-economic costs of transition and support economic projects: investments in small and medium enterprises; creation of new companies; research and innovation; reclamation of former mining areas; production of clean energy; upgrading and retraining workers; job search assistance and active inclusion programmes for job seekers; and the conversion of existing installations emitting large quantities of carbon dioxide, if such investments would lead to significant reduction of emissions and protection of jobs.

¹ Global warming of 1.5°C, IPPC, IPCC, *Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty*, In Press, 2018; IPCC, *Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change*, Cambridge University Press, In Press, 2021.

² Teraz Środowisko, 'Rada Europejska przyjęła unijne prawo klimatyczne', Teraz Środowisko, 28 June 2021.

Territorial Just Transition Plans

European countries, including Poland, that wanted to use these funds in their coal regions were obliged to prepare Territorial Just Transition Plans (TJTPs). These Plans have now been sent to the European Commission for further negotiations. TJTPs are developed at the sub-regional level (NUTS-3); therefore, countries prepare documents for each territory where they plan to use the Just Transition Fund.

These documents include:

- a description of the expected transition towards a climate-neutral economy in line with the objectives of the National Energy and Climate Plans (NECPs) and other existing documents
- a schedule for the phase-out or restriction of lignite and hard coal mining or the production of electricity in coal-fired installations
- a description of the territories that are expected to be most affected by the negative consequences of the transition
- an assessment of the economic, social and territorial impacts of the transition to a climate-neutral economy
- the development needs and objectives for achieving climate neutrality by 2030
- the types of actions and operations planned
- a description of the process of public participation, monitoring and evaluation

An extremely important part of the plan preparation process is ensuring the participation of local communities and civil society organisations. In a letter from March 2021, several European NGOs (including Polish Green Network), observing the preparation process of the plans in their countries, called on the European Commission to strongly enforce the principle of partnership within the process. In particular, this included inviting representatives of all interested groups to cooperate, making the process public, and conducting a broad social dialogue, which in most regions was not the case.

Development of the TJTP in Poland

Poland has two paths for this process: national and regional. The Ministry of Climate and Environment is developing the National Just Transition Plan (NJTP). Work on this document is coordinated by the Institute for Ecology of Industrial Areas (IETU). In parallel, work is being undertaken on Territorial Just Transition Plans in each of the six provinces with coal regions. Seven plans for sub-regions have been prepared. The European Commission has entrusted the consulting firm PricewaterhouseCoopers (PwC) with supporting the regions in developing TJTPs. The exact allocation of resources from the Fund has not yet been ultimately determined. It is already known that the national Programme of European Just Transition Funds will include co-financing for

horizontal activities covering all regions (which is specified in the NJTP) and co-financing for the individual six regions.

In the regions, the development of the plans is coordinated by the Marshal Offices, which have established special working groups consisting of the representatives of the following: the European Commission Directorates-General, national government administration (Ministry of Climate and Environment, Ministry of Development Funds and Regional Policy, commissions and sub-commissions of the Seym), voivodeship offices, regional development agencies, local governments, chambers of commerce, business organisations, representatives from the fields of science and education, non-governmental organisations, trade unions and the media.

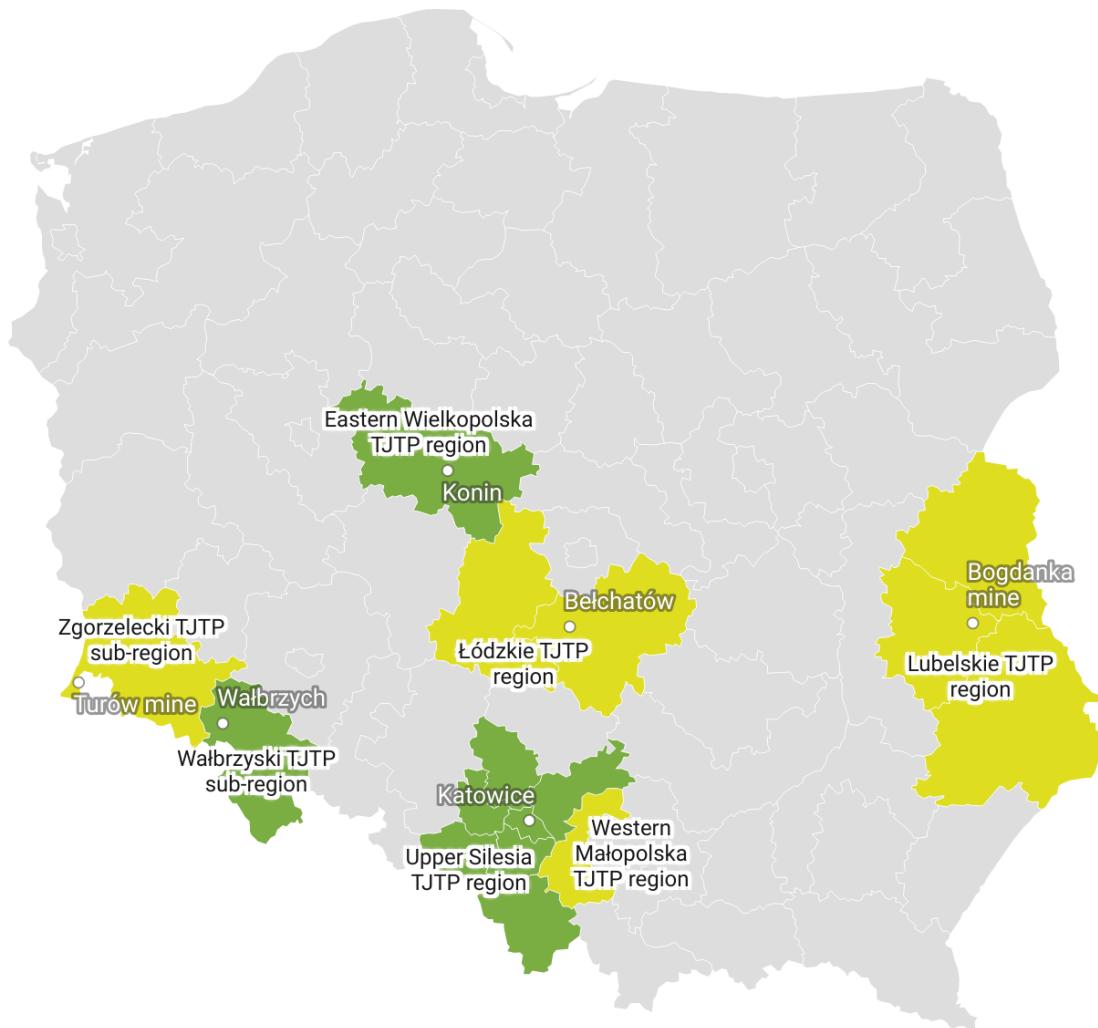
An important condition for receiving support from the Fund is providing a timetable for closing mines by 2030 or declaring a significant reduction in coal output. In five regions – Łódzkie (the Bełchatów mine), Zgorzelec County (the Turów mine), Lubelskie (the Bogdanka mine), Upper Silesia and Western Małopolska – coal extraction is planned to continue well beyond 2030.

Initially, the European Commission planned to give support from the Just Transition Fund to three Polish coal regions (Upper Silesia, Eastern Wielkopolska, the Wałbrzych sub-region), but the Ministry of Funds and Regional Policy negotiated funds for four more regions. When the Polish government in April extended the concession for lignite mining in the Turów mine to 2044, the European Commission unofficially communicated that it will refuse to support the region from the Fund. In three regions (Łódzkie, Lubelskie and Western Małopolska), negotiations with the Commission are underway. As far as Upper Silesia is concerned, the Commission declared its support, despite the fact that the coal mine decommissioning process was spread out over almost 30 years, as it is currently the biggest coal mining region in Europe. It is possible, however, that the Commission will require an acceleration of decarbonisation in this area. There are also plans to build new mines in Upper Silesia, which, according to the rules, should exclude the region from support from the Fund. Concerned civil society organisations appealed at the end of June 2021 to the Marshal of the Silesian Voivodeship to take action to secure EU funding.

Just Transition regions in Poland

Priority Just Transition region

█ No █ Yes



Map of Polish Just Transition regions based on the Program on European Funds for Just Transition, prepared by the Department for the Coordination of Implementation of EU Funds at the Polish Ministry of Funds and Regional Policy, April 2021.

Map: CEE Bankwatch Network • Created with Datawrapper

In green, the map shows the three regions which have already been confirmed as recipients of the Just Transition Fund: 1) Eastern Wielkopolska (in NUTS 3 terms located in the Koniński sub-region) with the main mining/energy sector-related town of Konin; 2) the Wałbrzyski sub-region (part of Lower Silesia) with its main town of Wałbrzych; 3) Upper Silesia (seven NUTS 3 sub-regions, i.e., Katowicki, Bielski, Tyski, Rybnicki, Gliwicki, Bytomski, and Sosnowiecki) with its main city of Katowice. In yellow, the map shows the regions that have not yet been confirmed as recipients of the JTF: 4) Łódzkie (two NUTS 3 sub-regions: Piotrkowski and Sieradzki) with the main mining and energy-sector related town of Bełchatów; 5) Lubelskie (three NUTS 3 sub-regions, i.e., Lubelski, Chełmsko-Zamojski, and Bialski) with just transition activities mainly focusing around the Bogdanka mine; 6) Zgorzelec county (in NUTS 3 terms, located inside the Jeleniogórski sub-region of the Lower Silesia voivodeship), focusing mainly around the Turów mine; and 7) Western Małopolska (one NUTS 3 sub-region: Oświęcimski).

Timetable for the TJTP in Poland

July 2020 – June 2021	Work and consultation in working groups
May – June 2021	Open public consultations in 5 regions (Eastern Wielkopolska, Western Małopolska, Upper Silesia, Lubelskie and Łódzkie) and open meetings with stakeholder groups in Eastern Wielkopolska and Upper Silesia (starting in February)
March – June 2021	TJTP consultation at the Ministry of Funds and Regional Policy
End of June 2021	Official submission deadline for the TJTP for consultation and negotiations with the European Commission

Social participation

In each region, the plan preparation and consultation process differed markedly. The plans were subjected to open public consultation in five regions, in a variety of forms: meetings, workshops and written submissions. During this six-month period, thanks to active involvement, the voices of experts from environmental organisations were taken into account and the public had the opportunity to learn more about the process. In general, we registered that interest in the matter is growing, but we cannot yet speak of widespread public involvement. The representatives of Polish Green Network and other Polish organisations also took part in working groups preparing the TJTPs for Upper Silesia, Western Małopolska and Eastern Wielkopolska, as well as for the Łódzkie and Wałbrzych regions.

In Lubelskie, we were unable to obtain information on the progress of the Plan's development process.

A truly participatory and transparent process can be observed in Eastern Wielkopolska, which is the leader of just transition in Poland. Submitted comments were taken into account and had a real impact on the shape of the Plan. From the very beginning, non-governmental organisations have been involved in the process there, co-shaping the Plan and the regional development strategy. Since November 2020, Polish Green Network has been organising the Eastern Wielkopolska Partnership Forum, which includes all parties interested in the just transition process. The aim of the last Forum held in May was to once again discuss the status of work on the TJTP and to discuss the comments made to the latest version of the document.

Timetable for regional coal phase-out

The Polish government has declared 2049 as the date for phasing out coal, while end dates vary by region.

Eastern Wielkopolska and the Wałbrzych sub-region	Phasing out coal in the power and heating sector by 2030
Upper Silesia and Western Małopolska	Completion of mining operations in 2049
Łódzkie region	Shutting down power units in the Bełchatów Power Plant will commence between 2030 and 2036, the ongoing exploitation of lignite deposits in the Bełchatów and Szczerców fields will end in 2026 and 2038 respectively.
Lubelskie region	No information is available on the mining phase-out date. By 2040, the mine is expected to reduce coal mining by nearly 75 per cent.
Zgorzelec County ³	Completion of Turów mine in 2044

³Zgorzelec County is a part of the Lower Silesia region, in which the Turów mine and power plant are based. The Wałbrzych sub-region is also a part of the Lower Silesia region. These two sub-regions are treated separately, because their status in the EU just transition process is different. The funds from the Just Transition Fund are secured for the Wałbrzych sub-region, whereas for the Zgorzelec County the funds are very uncertain as there are plans for the Turów mine to remain operating until 2044.

Declared CO₂ emissions reduction targets in the regions

Eastern Wielkopolska	Achieve climate neutrality in the sub-region by 2040 and reduce CO ₂ emissions in the electricity sector by more than 90 to 95 per cent by 2030, and by 80 to 90 per cent in other sectors by 2040; by 2030 there will be a reduction in greenhouse gas emissions by over 55 per cent, increasing the share of energy from RES in total consumption to exceed 32 per cent and increasing energy efficiency by 32.5 per cent.
Upper Silesia	In compliance with climate and energy targets in the National Energy and Climate Plan. A 62.1 per cent CO ₂ energy sector reduction by 2030.
Wałbrzych sub-region	A 55 per cent reduction in CO ₂ emissions in the sub-region by 2030 and achievement of climate neutrality by 2040.
Łódzkie region	A 77 per cent reduction in CO ₂ emissions by 2030 for the Bełchatów Energy Complex.
Western Małopolska	In compliance with earlier EU 2030 climate targets (40 per cent greenhouse gas emissions reduction). An energy and industry sector reduction of nearly 50 per cent.
Lubelskie region	A 35 per cent reduction of greenhouse gases in the region by 2030.

Overall vision of the TJTP

The overall vision of the Territorial Just Transition Plans is to make local economies independent of the coal and lignite mining industry. This is to be achieved by diversifying, modernising and increasing the attractiveness of the regions, increasing the quality of life, and preventing the development of the undesirable social effects of the transition.

The scope of assistance for each region is an outcome of the support focus and the individual needs and challenges of each region, identified at the EU level on the basis of the most accurate information provided by the local population and non-governmental organisations.

Regional specificity of the TJTPs – main focus of interventions⁴

Eastern Wielkopolska	Building a zero-carbon, dynamic circular economy, including: investment support for SMEs for adapting to changing market conditions, technological development and the creation of new jobs; development of technology hubs, business incubators; improving qualifications and retraining of staff in the fields of mining and fuel and energy, and support for entrepreneurs and young people; revitalisation and decontamination of degraded areas; restoring and increasing water resources; development of brownfield sites and post-mining areas, including for the development of RES installations; climate change adaptation measures; investment in zero-emission public transport; support for RES within the scope of the development of community energy; initiatives related to the social inclusion of people affected by the transition.
Upper Silesia	Development of high-tech potential and institutions supporting climate neutral innovation; supporting the diversification of the activities of companies from the mining sector and mining-related activities sector, including digitisation, automation and circular economy initiatives; creation of new companies and developing economic activity; raising investment attractiveness and economic promotion of the sub-regions; development of distributed energy generation based on renewable energy sources; support for low-carbon and energy efficient housing and reducing energy poverty; repurposing brownfield sites for regional development; countering the effects of industrial activities; development of environmentally-friendly transport; creating conditions for professional development and vocational training; instruments relating to labour market interventions to ensure a continuous career or career path change; mitigating the negative social and health effects of the transition.
Wałbrzych sub-region	Stimulation of the economic sector, related to the development of the RES and energy efficiency market; grant support for SME investments aimed at: creating new jobs, reducing greenhouse gas emissions and decarbonisation, implementation of circular economy, reducing the energy intensity of processes and services; occupational reorientation of workers of existing companies and their retraining to new RES and energy efficiency-based professions; creation of technology

⁴Territorial Just Transition Plans (accessed 10 August 2021): [Eastern Wielkopolska](#); [Upper Silesia](#); [Wałbrzych sub-region](#); [Łódzkie region](#); [Western Małopolska](#); [Lubelskie region](#)

	<p>hubs, competency centres and business incubators; investment in the business infrastructure of heating companies; reclamation and repurposing of post-industrial and degraded areas; revitalisation of urban and rural areas; development of electric, railway and zero-emission bus transportation based on alternative fuels; support measures for the job market and for people who are excluded or at risk of exclusion; counteracting energy poverty; establishment of energy cooperatives.</p>
Łódzkie region	<p>Diversification of the economy towards zero-emission power generation instead of coal-fired power generation, as well as creating new jobs and developing employee competencies; generating and implementing innovations and modern technological solutions, in particular in the SME sector, including <i>inter alia</i> circular economy, RES and energy-efficient and passive construction; repurposing degraded areas for new economic functions, including use of land and facilities of the mining and energy complex; comprehensive support for vocational training, job placement and the organisation of vocational training for employees leaving the energy and mining sector as well as for other job seekers; social and professional activation of people at risk of poverty and social exclusion; support for RES towards community-based energy, energy clusters and energy cooperatives; support for innovative solutions (hydrogen technologies) and further development of RES; investments in zero- and low-emission rolling stock.</p>
Western Małopolska	<p>Support for people affected by the transition – employees from the mining sector and related industries; support for entrepreneurial development in order to create new, sustainable jobs in the region; support for productive investments of large enterprises that prevent the loss of jobs or create new jobs; investment support for the restructuring of local companies; development of existing clusters based on local potentials and specialisations; implementation of energy storage technologies; initiatives aimed at energy efficiency improvements and expansion of RES, including projects to reduce energy poverty; development of an integrated and zero-emission public transport system with the necessary infrastructure (including the development of hydrogen technologies); giving new social, economic and ecological functions to post-industrial and post-mining areas and facilities.</p>
Lubelskie region	<p>Investments in SMEs from sectors related to mining, aimed at maintaining existing jobs and creating new ones; investments in SMEs contributing to decarbonisation or reduction of greenhouse gas emissions, expansion of RES and energy efficiency investments; upgrading and</p>

changing employees' qualifications, including in connection with the implementation of green technologies (including RES) and digitisation; counteracting social exclusion and energy poverty; support for the development of cooperatives and energy clusters, using RES and energy storage; development of efficient, low-emission district heating and biogas networks; investments in improving the energy efficiency of public buildings and housing as well as replacing heat sources with low- and zero-emission technologies; rehabilitation, restoration, remediation, decontamination and development of post-mining areas.

TJTP evaluation

The Eastern Wielkopolska TJTP

1) Emissions reduction pledge in line with EU climate targets, achieving climate neutrality 10 years earlier than the EU.

This was the first coal mining region in Poland to declare its plan to achieve climate neutrality by 2040. Production in the three open pits will end as of 2021, 2022 and 2030, respectively. The decommissioning of the last coal unit of the power plant is planned for 2030.

2) An in-depth diagnosis of regional conditions and a good description of the situation in the local labour market.

The end of open-pit mining and the phase-out of units requires comprehensive measures to stimulate the local economy and to replace the jobs previously available in the power plant and mines, but also in external companies providing supplementary services to the ZE PAK Group. The ZE PAK Group employed 4,600 people at the end of 2019. It is estimated that by 2025, about 2,200 of the Group's employees will require support to change jobs and to provide them with qualifications that fit into labour market competency requirements in connection with the implementation of the European Green Deal.

What is missing in the Plan is an indication of how many people are employed in companies linked to the ZE PAK Group and the age structure of the people employed within the group, e.g. how many are of pre-retirement age.

3) Well-defined development goals by 2030.

Mitigation of the social, economic and environmental impacts of the transition to a climate-neutral economy will be achieved, inter alia, by building a zero-emission, dynamic, circular economy: the development of low-

emission public transport; the regeneration of post-mining areas; the restoration of proper water relations and of biodiversity. The Plan should include information on the potential for new jobs in relation to the projected objectives.

4) Broad, participatory public participation in the development of the TJTP.

The region can be regarded as a model region in Poland in terms of intersectoral cooperation in the development of the TJTP.

The Upper Silesian TJTP

1) There is no information about the emission reduction target at the sub-regional level.

Due to the gradual closure of coal-fired units by 2030, the production of electricity from coal will fall by nearly 80 per cent. It is also assumed that the planned reduction of electricity production from hard coal will translate into a 62.1 per cent reduction in CO₂ by 2030. However, the Plan does not state what scale of emission reduction is anticipated in the region. The Marshal's Office indicates that it is not possible to establish the reduction of greenhouse gas emissions in the entire province due to the lack of data needed to make such calculations. The estimation of the emissions reduction target at the regional level is necessary in order to plan for climate neutrality.

2) The main transition burden is shifted to after 2030. The paper lacks information on the age structure of those employed in mining.

According to the timeline in the TJTP, three mines employing a total of 5,124 people will be closed by 2030. The document cites calculations by the University of Economics estimating that the decrease in employment in mining-related companies will reach 14,400 by 2030. The remaining 11 mines (employing a total of 36,900 people) will be liquidated after 2030. The estimated drop in employment in mining-related companies between 2030 and 2049 will amount to 105,600 people. By 2030, four coal-fired power plants located in the Silesian Voivodeship are to cease operation – the Łaziska Power Plant by 2028, and the Rybnik, Jaworzno and Łagisza Power Plants by 2030. In connection with the planned decommissioning of coal units in these power plants, employment will be reduced by 848 persons by 2030. However, the Plan acknowledges that the scale of people affected by closing mining operations may be much higher than estimated, taking into account indirect impacts on retailers, service providers and employees' families.

3) In-depth diagnosis of the socio-economic situation of the region.

The Plan describes in detail demographic, social, spatial and environmental problems (related to the degradation of post-mining areas, water, soil and air pollution). It has been estimated that the number of jobs to be created by 2030 under the TJTP will reach 29,400.

4) A clear description of the 2030 development goals, challenges and outcomes for achieving climate neutrality at the European Union level by 2050.

The region will try to achieve the goal of creating a green, digital economy, ensuring a high quality of life for its inhabitants in a clean environment. The goals cover three areas: economy, environment and society. However, we should expect much more advanced and ambitious undertakings, focused on phasing out coal and building a green economy, from a region that has been deeply impacted since the early 1990s by its dependency on coal-related industry. Moreover, a conspicuous obstacle in achieving the 2030 climate goals is the newly issued license for a new coal mine in Mysłowice County.

TJTP of the Wałbrzych sub-region

1) Emissions reduction pledge in line with EU climate targets. Achieve climate neutrality 10 years earlier than the EU.

The CO₂ reduction plan is in line with EU targets. The region will aim to reach a 55 per cent CO₂ reduction by 2030 and a total reduction of the sub-region's CO₂ emissions by 2050. Moreover, it plans to create about 7,000 additional jobs in green or climate-neutral sectors of the economy by 2030 and 37,000 jobs by 2050. The share of RES in the overall energy mix will be increased to 38 per cent. Renewable energy sources will also become an important (ca. 40 per cent) element of the heating and cooling sector.

2) Well-described areas of intervention in the environmental, social and economic fields.

The region is good at diagnosing the biggest challenges and mapping areas of intervention. Important actions include reducing social exclusion and energy poverty and investing in the implementation of technologies and infrastructure to ensure affordable clean energy. It has been estimated that the entire sub-region has about 100,000 coal-fired furnaces that need to be replaced and about 35,000 buildings requiring thermal efficiency improvements.

3) Clear choice of specialisation development and priority actions.

The Wałbrzych sub-region emphasised the necessity of following the development of prosumer, renewable energy sources, thanks to which the region will strive for energy self-sufficiency. Moreover, reclamation and revitalisation operations on degraded areas will be priority actions. The economic specialisation of the region will be the e-mobility sector.

TJTP of the Łódzkie region

1) Lack of clarity on what actions lead to the 2030 CO₂ emission reductions stated in the TJTP.

The TJTP assumes, among other things, that the coal units in the Bełchatów Power Plant will cease operation by 2036 and lignite production from the last field (Szczerców) will end by 2038. The document does not indicate how many coal units in the power plant will be phased out by 2030. This schedule raises doubts when compared with the declared reduction of CO₂ emissions from the power industry by nearly 80 per cent by 2030. The document also fails to show a reduction target covering the entire region, which is crucial in planning the transition.

2) Lack of transition vision and insufficient new jobs.

The Plan lacks a specific vision for what will constitute the competitive advantage of the region after the mining and power plant complex ceases to operate. Transition is treated as an externally imposed imperative rather than a development opportunity. The TJTP pays little attention to detailed solutions for creating new jobs, stimulating entrepreneurship, attracting investors, and supporting local employers and employees. The energy company Polska Grupa Energetyczna (PGE – Polish Energy Group) presented its project proposals in the document, including the construction of photovoltaic and wind farms, which would employ only 20 people at the exploitation stage.

3) The threat of not respecting the Polluter Pays Principle.

The transfer of the mine and power plant to a new state-owned company, the National Energy Safety Agency (NABE), may result in PGE not taking sufficient responsibility for the future of the plant and mine workers and for the reclamation of degraded land and restoration of proper water relations.

4) Lack of broad public participation in the creation of the TJTP.

There was a noticeable lack of participation of environmental organisations and many other social organisations in the process of the TJTP creation in the Łódzkie region.

TJTP of Western Małopolska

1) Declaration of greenhouse gas emissions reductions incompatible with new European Union reduction targets.

Greenhouse gas emissions reduction targets for Małopolska are in line with the now obsolete EU reduction goals. It is necessary for the reduction targets set in the TJTP to be adjusted to the scale of the challenges in line with the new Fit for 55 climate action package.

2) Postponing the transition beyond 2030.

Brzeszcze and Janina will close in 2040 and 2049 respectively. In order to receive support from the Just Transition Fund, the region must demonstrate that the transition will take place over the next nine years. Such distant dates of plant closures are inconsistent with the Paris Agreement and increasingly ambitious EU climate policy.

3) Well described transitional sectors.

The document very nicely diagnoses the sectors which emit the largest quantities of CO₂. It is important that in the next step support is planned for the employees of the mining sector, the processing industry, and the heating sector. After all, around 8,700 to 10,100 jobs connected with mining are under threat.

TJTP of the Lubelskie region

1) Insufficient CO₂ emission reduction pace – not in line with EU reduction targets.

The draft plan assumes that the Bogdanka mine will reduce hard coal output by 33 per cent by the end of the decade and nearly 75 per cent by 2040, focusing on coking coal extraction. The Plan provides for a reduction of CO₂ emissions in the province by 35 per cent by 2030, which is too low a reduction target in comparison to EU goals. There is also no information about the reduction plan for 2040.

2) Insufficient support for miners leaving the mine.

The document pays little attention to the issue of supporting miners leaving coal mining. The plan fails to describe the direction of future development of the region and the industries, which would provide an indication of where miners and employees of mining-related companies may find employment. It also fails to present ideas for retraining programmes for miners and employees of mining-related companies.

3) The threat of not respecting the Polluter Pays Principle.

The presented Plan does not demonstrate the responsibility of the LW Bogdanka mine for environmental damage caused by mining activities, such as the deterioration of water relations and of valuable peat bogs, in accordance with the Polluter Pays Principle, which is expected according to EU legislation.

4) Coking coal does not support Poland's climate neutrality.

While reducing hard coal output, Bogdanka wants to start mining coking coal. Thus, it is not a coherent plan for transition understood as moving away from coal towards a low-emission economy.

5) Lack of broad public participation in the creation of the TJTP.

There was noticeable lack of participation of environmental organisations and many other social organisations in the TJTP creation process in the Lubelskie region.

Recommendations

1) Improving the implementation of the partnership principle

One of the most important recommendations at this stage of work on the just transition of coal regions in Poland is to involve all interested groups in the process, including stakeholders who are still not aware that the transition also affects them. Above all, the inhabitants themselves must be involved, because only then will it be possible to take the most socially, environmentally and economically appropriate actions. This is a task for local governments, whose priorities should be the quality of life of their inhabitants and future generations in the context of climate change impacts and the depletion of natural resources.

The energy transition brings with it large-scale economic and social changes, hence the need for a thorough and multifaceted educational campaign about the goals and challenges of this process. It is necessary for miners, their families and communities in coal mining regions to know why they are undergoing a transition and to be able to actively participate in it. This will give the process a chance to gain widespread public support, not just passive approval. The measures being put in place are probably the last such great opportunity to intensify efforts to modernise the energy and economic system in order to save us from ecological and societal collapse. We must not waste this opportunity, hence the importance of mobilising society to support and participate in implementing this change.

At this stage, it is important to include – as soon as possible – a wide range of actors: social organisations, local entrepreneurs, employees and companies operating in the regions in the process of making a transition project. This is a task for local governments. Declaring how many potential jobs will be available in new sectors is no longer a distant future, but a scenario that is bound to happen here and now. Therefore, concrete declarations of how many new workplaces will be created in a given region are needed now, so that the local market can properly prepare for the changes. The lack of such declarations is currently the biggest weakness of the TJTPs.

2) Improving the diagnosis and proposals offered to mining and energy sector employees

The mining companies in coal regions should now provide public information on the realistic dates of the closing of mines and power plants and inform its employees about the exact dates when they will be dismissed. Simultaneously, detailed surveys should be distributed among the miners and employees from mine-related industries in order to diagnose their skills and possibility to work in a different profession or industry. As a result, mining regions will be able to prepare for thousands of employees entering the labour market. Such information is absolutely necessary in order to enable the preparation of instruments for the activation and integration of said employees into the labour market and planning of the development of sectors other than those related to fossil fuels sectors. An important role in these sectors should be performed by SMEs, which by diversifying the local economy would be able to employ those leaving the mining sector.

At present, miners do not trust the transformation process and indicate that they do not see any concrete proposals for the creation of new jobs. A speedy initiation of conversations with the miners about their further careers would lead to the employees of this sector gaining more trust in the transformation process. Simultaneously, regional authorities should conduct active conversations concerning the possibilities of

developing new workplaces for the people leaving the mining industry with entrepreneurs, especially those involved in the automotive or construction industries, as these are indicated by the miners as best corresponding with their skill sets.

3) Increasing climate ambitions in the plans

In the majority of the TJTPs, the climate ambitions are in line with the Polish National Energy and Climate Plan and Energy Policy of Poland until 2040, which in turn do not comply with the European Union's new climate goals. The NECP will be updated in 2023 and it is almost certain that its goals in terms of the share of renewable energy sources and energy efficiency will be increased.

The actions to be conducted within the framework of the Territorial Just Transition Plans cannot be based on outdated strategic assumptions, which do not respond to the challenges we are facing connected to the need to reduce greenhouse gas emissions. The goals for emissions reduction, as well as those for the increase of energy efficiency and of the amount of energy produced from renewable energy sources, should be set to be achieved by 2030 in accordance with the European Green Deal strategy. Scientists claim that the next nine years will be key in our fight for limiting the effects of climate change through the highest possible reduction of greenhouse gas emissions into the atmosphere.

The Just Transition regions play an especially significant role in this regard, because it is there that most of the fossil fuels are extracted and burnt. As a result, their reduction strategies should be adapted to the scale of the challenges we face. The planned decrease in greenhouse gas emissions should amount to 55 per cent as compared to 1990, and the share of renewable energy sources in the production of electricity should aim at 40 per cent by 2030.

4) Adhering to the Polluter Pays Principle

Attempts are being made to push financial responsibility for land restoration away from the companies that profited from mining and fossil fuel-fired energy production and into the Just Transition Fund. These funds were not meant to be used to bail polluters out of their responsibilities, but rather as an answer to other social priorities and pressing needs resulting from the phasing out of carbon-intensive industries.

The Polluter Pays Principle is an important issue in the implementation of just transition support, due to the complexity of the issue and the danger of misusing public funds. The Just Transition Fund and other related mechanisms should only be seen as a form of complementary funds to supplement obligatory restoration and rehabilitation processes, which should first of all be covered financially by polluting entities – in accordance with the Polluter Pays Principle. While the JTF would be a good resource for preparing and implementing repurposing projects, which the local communities are counting on occurring, the regions need to begin by conducting a comprehensive assessment of the works that should first be covered by the polluting entities, before attempting to use JTF funds to cover repurposing projects.