POLAND

Summary of the Commission assessment of the draft National Energy and Climate Plan 2021-2030

The EU has committed itself to a clean energy transition, which will contribute to fulfilling the goals of the Paris Agreement on climate change and provide clean energy to all. To deliver on this commitment, the EU has set binding climate and energy targets for 2030: reducing greenhouse gas emissions by at least 40%, increasing energy efficiency by at least 32.5%, increasing the share of renewable energy to at least 32% of EU energy use and guaranteeing at least 15% electricity inter-connection levels between neighbouring Member States. To ensure that the EU targets are met, EU legislation requires that each Member State drafts a 10-year National Energy and Climate Plan (NECP), setting out how to reach its national targets, including the binding national target for reducing greenhouse gas emissions that are not covered by the EU Emissions Trading System (ETS). The European Commission has analysed each draft NECP. The summary of this assessment for Poland is outlined below. The final NECPs for the period 2021-2030 are due to be submitted by Member States by the end of 2019.

POLAND - National targets and contributions foreseen in the draft National Energy and Climate Plan

The Polish draft integrated National Energy and Climate Plan (NECP) is well-developed and offers a balanced overview of the five Energy Union dimensions, relying on an integrated assessment. It outlines the planned changes to the energy sector in view of 2030, indicating that energy consumption would remain above 2005 levels. The shift of investments from fossil fuels to renewables is expected to accelerate in the ten year period covered by the plan, and domestic gas and coal production and electricity imports would be maintained. On this basis a strong final plan can be developed if coherence between targets, objectives and contributions related to different Energy Union dimensions is fully addressed and underpinned with policies and measures in a way that exploits the opportunities resulting from increased renewable energy and energy efficiency for the modernisation of the economy and job creation.

The draft Polish plan contains a comprehensive analytical basis which shows that additional measures are required to achieve Poland’s 2030 -7% greenhouse gas (GHG) emission target compared to 2005 for sectors not covered by the EU Emissions Trading System (non-ETS), as set in the Effort Sharing Regulation (ESR). The draft plan describes qualitatively some planned climate policies and measures, mostly in the transport sector, while scarce information is provided on GHG emission reduction measures in the building and agriculture sectors.

Poland intends to use the flexibilities available under the Effort Sharing Regulation, if necessary. However the draft NECP does not yet provide information on policies and measures to generate the necessary Land Use, Land Use Change and Forestry (LULUCF) credits to comply with the non-ETS target. Poland’s Forest Carbon Farm pilot project to increase carbon dioxide removal in forests and improve modelling of carbon sequestration in forests is a good step in this direction.

The renewable energy contribution to the EU’s 2030 target set out in the draft NECP (21%) is significantly below the share of 25% in 2030 that results from the formula of Annex II of the Governance Regulation, a situation which would also require an indicative trajectory in the final plan that reaches all reference points in accordance with the national contribution set out in the final plan. The draft plan indicates a significant increase of investments in renewable electricity after 2025 compared to previous years. It is important that the final plan demonstrates in a more detailed manner how Poland plans to stay above the national 2020 target for renewables (in light of the obligation to respect the 2020 baseline for renewables) and how it will meet all three reference points on the indicative renewables trajectory to 2030. More importantly, renewable energy could play an increasingly important role in creating more jobs and business opportunities. The final plan would benefit from elaborating further on the policies and measures allowing the achievement of the contribution and on other relevant sectorial measures.

Poland intends to reduce its energy consumption by 2030, but the level of the energy efficiency contribution set out in the draft plan appears modest considering the level of effort needed to reach

---

3 Pursuant to Article 4(a)(2) of Regulation 2018/1999.
4 Regulation (EU) on the Governance of the Energy Union and Climate Action.
the EU’s energy efficiency target for 2030. At the same time, the complementary energy efficiency objectives are quantified (for example on smart meters), which constitutes an approach that could be replicated by other Member States. Details on policies and measures could be better elaborated upon in the final plan to support the credibility of the national ambition level.

- **Energy security** is a very important element of the draft plan. The final plan could prioritise more clearly the key elements in this Energy Union dimension and the interactions between this dimension and the other Energy Union dimensions.

- On the **internal energy market**, the draft plan sets out intended outcomes related to the electricity interconnectivity level, energy transmission infrastructure, market integration and energy poverty in a comprehensive manner. The final plan needs to lay out clearly how internal market policies and measures will support the objectives, targets and contributions for 2030. While the draft plan sets out specific policies and measures to define and address **energy poverty**, there would be benefit in further specifying objectives for reducing energy poverty and intended impacts in the final plan.

- On **research and innovation**, the ‘Directions of Energy Innovation Development’ of the Polish Ministry of Energy are a solid basis for developing further underpinning policies and measures to be included in the final plan, in which a clearer distinction between objectives, and implementation of policies and measures could be made.

- Poland aims at 1 million electric vehicles by 2025. While **electromobility** is covered well as a cross-cutting issue in various sections of the draft plan, the final plan could be more precise on policies and measures and required charging infrastructure planned and on the implications of this target in different dimensions of the Energy Union.

- The draft NECP provides **investment needs** of annually around 3% of GDP for modernising the energy producing sector to achieve the energy objectives and specifies them by fuel for electricity. A complete final plan would cover investment needs also for energy efficiency and other greenhouse gas reducing measures. This would take full advantage of the role NECPs can play in providing clarity to investors and attract additional investments in the clean energy transition.

- The final plan would benefit from addressing impacts of planned policies and measures including the use of EU funds on **competitiveness** more consistently, reflecting also the opportunities of the modernisation of the economy.

- The draft plan refers to **regional cooperation** in different high-level groups such as the Visegrad Group and the Pentalateral Forum as well as planned bilateral initiatives. There is potential for intensifying the already existing cooperation, especially in areas such as energy security and internal market, just transition issues, decarbonisation and renewables deployment.

- The plan mentions several measures with potentially synergetic impacts on air quality and climate, especially in the domestic heating and transport sectors. However, the final plan would benefit from strengthening the analysis of the interactions with **air quality and air emissions policy**, including from a quantitative perspective.

- The final plan would benefit from details on **just and fair transition** issues, such as information on the applicability of the concept of just transition in the national context, for example related to the transition of coal, or carbon-intensive or industrial regions, and considerations in terms of costs and
benefits and cost-effectiveness of planned policies and measures. The draft plan would benefit from providing more details on the question of skills and training.

- When completing the final plan with national policies, timelines and measures that are planned to phase out energy subsidies, in particular for fossil fuels, measures mitigating the impact on vulnerable consumers should receive specific attention. A list of all energy subsidies and actions undertaken and planned to phase them out, in particular for fossil fuels, need to be included in the final plan.

- The draft NECP includes a detailed and comprehensive set of climate adaptation policies and measures, such as actions to protect biodiversity and forest management in the context of climate change. This constitutes an example of good practice, which could be replicated by other Member States.

Related links:

- [National Energy & Climate Plans](#) – for links to the Commission recommendations and Staff Working Document for Poland and all other Member States, to the Commission Communication assessing all draft NECPs, and to the draft NECPs themselves.
- More information about the [Clean energy for all Europeans package](#)
- More information about the [2030 climate & energy framework](#)