

28th March 2022

EU funds must finance Poland's green energy security!

The position of Polish civil society organisations

Putin's aggression against Ukraine has brought about a major priority shift in Europe, which largely depends on Russian fuels. To break free from this addiction and increase security, not just in terms of energy, the EU must accelerate its green transition. We need an urgent revision of spending priorities for EU funds.

In the wake of Russia's aggression against Ukraine, there is now a nationwide consensus with regard to ceasing imports of Russian fossil fuels. Poland is greatly dependent on them, having bought around 66% of imported oil and 55% gas from Moscow in 2020 alone.¹ **CSOs and experts support the Polish government and the European Commission in their declarations to quit gas, coal and oil that finance Kremlin's oppressive regime – and call for turning these words into action.**

However, there is no general agreement concerning what should substitute Russian fuels. Public debate offers false solutions such as the 'rehabilitation of coal', which are economically unjustified and would not secure national energy security while making the climate crisis worse.

The only solution that would enable us to stop importing fossil fuels from Russia while increasing Poland's energy independence and security are quick, large-scale, but also thought-out and systemic investments in energy efficiency (electrification of heating systems, energy retrofits of buildings), renewables (apart from burning solid fuels) and decarbonisation of industry. These priorities have been defined by the European Commission in REPower EU,² an initiative drawn up in response to the war in Ukraine, which strives to limit gas imports from Russia by ⅓ until the end of 2022 and phase them out completely by 2030.

Polish legislation also requires immediate improvements to stimulate, rather than hamper, the development of renewables in Poland. Take the infamous 10H rule that precludes the construction of wind turbines on a staggering 99.7% of Poland's territory.³

¹ J. Maćkowiak-Pandera, A. Gawlikowska-Fyk, *The end of energy resource imports from Russia?*, Forum Energii, 28/02/2022, <https://forum-energii.eu/pl/blog/stop-import-rosja>

² "The quicker we switch to renewables and hydrogen, combined with more energy efficiency, the quicker we will be truly independent (...)" – Ursula von der Leyen, *REPowerEU: Joint European action for more affordable, secure and sustainable energy*, 08/03/2022, https://ec.europa.eu/commission/presscorner/detail/pl/ip_22_1511

³ P. Czyżak, *Change is in the wind*, EMBER, 15/03/2022, <https://ember-climate.org/insights/research/change-is-in-the-wind/>

The funds for green energy security are there. They just have to be well spent. Poland can count on hundreds of billions of euros from various EU financial instruments:

- EUR 76 billion under cohesion policy,
- over EUR 58 billion under the National Recovery and Resilience Plan, and
- up to EUR 9 billion from the Modernisation Fund (depending on the price of CO₂ emission allowances).

Between 30% and 37% of the funds under cohesion policy and national recovery plans – and 100% funds allocated from the Modernisation Fund – have to be spent on climate action. Meanwhile, the ambition levels of draft cohesion policy programmes and the recovery plan that are currently being negotiated by the Polish government and the European Commission are ill-suited to current challenges. What is more, they contain ideas that are simply harmful, pushing Poland's energy sector down a blind alley, setting up a gas trap for the country and increasing our dependence on foreign energy sources. They would also lead to increased fuel consumption in transport by developing the road network. What is more, the plans include investing in the incineration of waste which should instead be recycled in line with the principles of the circular economy. All in all, instead of increasing our energy security and security of raw materials, currently planned expenditure would lower them.

This is why we urge Poland's government and the European Commission to immediately adapt the Partnership Agreement, cohesion policy programmes and the National Recovery and Resilience Plan to the energy security challenges Poland is currently facing. Poland must prioritise energy savings and replace fossil fuels with renewable energy sources. We need a new energy doctrine – green energy security based on local green energy resources.

Our new priorities have to be as follows:

- ★ investments in energy savings and increasing **energy efficiency**, including massive renovations of buildings.
- ★ increased spending on **clean air** measures that reward energy efficiency and RES-based solutions, withdrawal from the 'national gasification' policy.
- ★ increased spending on **clean transport** investments, including the development of multimodal transport solutions that prioritise rail. This should be coupled with supporting the development of green urban transport, including tram, cycling and pedestrian infrastructure. As a next step, the fleet of urban electric buses should be increased. The amount of funds allocated for these objectives is currently the same as in the 2014-2020 period. Rail links with neighbouring countries – fragmentary for EU standards – require improvements.
- ★ thought-out and systemic investments in **renewable energy sources**: modernisation of distribution networks and creation of energy storage facilities. The European Funds for Infrastructure, Climate and Environment programme (*Fundusze Europejskie na Infrastrukturę, Klimat, Środowisko, FEnKS*) currently earmarks only EUR 599 million for RES investments – ten times less than for roads and natural gas.

- ★ unlocking and supporting social potential through increased funding for all forms of **prosumerism**, including energy communities. To this end, legal barriers have to be removed.
- ★ **decarbonisation of industry** – supporting the industry in limiting its need for imported fuels.

Funds for the above should be redirected from other sources, including:

- ★ investments in **natural gas**, planned at an enormous scale in the recovery plan and cohesion policy programmes. Spikes in oil and gas prices from the beginning of 2022 and the legitimate desire to stop importing this fuel from Russia prove that over-scaled gasification plans for the power and heating sector are unreasonable. Meanwhile, around EUR 1.77 billion is to be allocated for investments related to natural gas under the FEnIKS programme. In the NRRP (the last available version from almost a year ago, i.e. 30/04/2021), although the specific amount is impossible to determine, the construction of the programme suggests that investments in gas will be dominant in district heating and replacement of heat sources in residential buildings. In turn, the Modernisation Fund is to invest more than €1 billion in cogeneration using gaseous fuels under two priority programmes. planned **road investments**, with EUR 4.5 billion allocated under the FEnIKS programme. Meanwhile, 70% of fuels burnt by vehicles on Polish roads comes from Russia. Investments that lead to an increase in road traffic while underinvesting in clean transport contribute to strengthening our energy dependence on Russia.

EU funds must support Poland's green transition and energy security. **Hundreds of billions of euros cannot go to waste! We call on the Polish government and the European Commission to urgently work on appropriate changes to EU structural funds and the NRRP.**

Joint position signed by the following organisations:

1. Akcja Demokracja [Action: Democracy]
2. CEE Bankwatch Network
3. Federacja Inicjatyw Oświatowych [Federation of Educational Initiatives]
4. Fundacja Aeris Futuro [Aeris Futuro Foundation]
5. Fundacja Aktywności Lokalnej [Foundation for Local Activity]
6. Fundacja CultureLab [CultureLab Foundation]
7. Fundacja Edukacji i Działań Społecznych [Foundation for Education and Social Action]
8. Fundacja Ekologiczna "Zielona Akcja" ['Green Action' Environmental Foundation]
9. Fundacja EkoRozwoju [EcoDevelopment Foundation]
10. Fundacja Forum Inicjatyw Społecznych [Social Initiatives Forum Foundation]
11. Fundacja GAP Polska [GAP Poland Foundation]
12. Fundacja Greenmind [Greenmind Foundation]
13. Fundacja Instytut Badań i Rozwoju Lokalnego [Research&Local Development Institute Foundation]
14. Fundacja Instytut na rzecz Ekorozwoju [Institute for Green Development Foundation]
15. Fundacja Instytut Zielonej Przyszłości [Green Future Institute Foundation]

16. Fundacja Kupuj Odpowiedzialnie [Buy Responsibly Foundation]
17. Fundacja Merkury [Mercury Foundation]
18. Fundacja na rzecz Efektywnego Wykorzystania Energii [Foundation for Effective Energy Use]
19. Fundacja Otwarty Plan [Open Plan Foundation]
20. Fundacja PRO EUROPAE BONO [PRO EUROPAE BONO Foundation]
21. Fundacja Rozwoju Ekonomii Społecznej [Foundation for the Development of Social Economy]
22. Fundacja Rozwoju Społeczeństwa Informacyjnego [Foundation for the Development of Information Society]
23. Fundacja „Rozwój Tak – Odkrywki Nie” [‘YES to Development – NO to Opencast Mines’ Foundation]
24. Fundacja Stabilo [Stabilo Foundation]
25. Fundacja Zielone Kujawy [Green Kuyavia Foundation]
26. Future Food 4 Climate
27. Green REV Institute
28. Towarzystwo Przyjaciół Warszawy [Friends of Warsaw Society]
29. Ogólnopolska Federacja Organizacji Pozarządowych [National Federation of Polish NGOs]
30. Ogólnopolskie Towarzystwo Ochrony Ptaków [Polish Society for the Protection of Birds]
31. Ośrodek Działań Ekologicznych „Źródła” [‘Sources’ Environmental Action Centre]
32. Polski Klub Ekologiczny Okręg Mazowiecki [Polish Environmental Club – Mazovian District]
33. Polski Klub Ekologiczny Okręg Pomorski [Polish Environmental Club – Pomeranian District]
34. Pomorskie Stowarzyszenie Aktywni Lokalnie [Pomeranian Locally Active Association]
35. Przedsiębiorstwo Społeczne 7 Niebo [7th Heaven Social Enterprise]
36. Społeczny Instytut Ekologiczny [Social Environmental Institute]
37. Spółdzielnia Socjalna Nasze Wsparcie [Our Support Social Cooperative]
38. Spółdzielnia Socjalna Zielony Zakątek [Green Spot Social Cooperative]
39. FSN-T NOT
40. Stowarzyszenia Aktywności Obywatelskiej “Radomka” [‘Radomka’ Civic Activity Association]
41. Stowarzyszenie BOMIASTO [BOMIASTO Association]
42. Stowarzyszenie Eko-Inicjatywa [Eco-Initiative Association]
43. Stowarzyszenie Ekologiczne EKO-UNIA [EKO-UNIA Environmental Association]
44. Stowarzyszenie Ekologiczno-Kulturalne 'Wspólna Ziemia' [‘Common Earth’ Environmental and Cultural Association]
45. Stowarzyszenie “EKOSKOP” [‘EKOSKOP’ Association]
46. Stowarzyszenie Federacja Zielonych “GAJA” [‘GAJA’ Green Federation Association]
47. Stowarzyszenie „Jesteśmy Razem” [‘We Are Together’ Association]
48. Stowarzyszenie Kłodzka Wstęga Sudetów - Lokalna Grupa Działania [Kłodzko Sudety Strip – Local Action Group Association]
49. Stowarzyszenie Nasze Imaginarium [Our Imaginarium Association]
50. Stowarzyszenie Organizatorów Ośrodków Innowacji i Przedsiębiorczości [Association of Organisers of Innovation and Entrepreneurship Centres]
51. Stowarzyszenie Pracownia na rzecz Wszystkich Istot [Workshop for All Creatures Association]
52. Stowarzyszenie Tilia [Tilia Association]
53. Stowarzyszenie Wejherowski Alarm Smogowy [Wejherowo Smog Alert Association]
54. Towarzystwo dla Natury i Człowieka [Nature and Human Society]

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55. Wrocławska Inicjatywa Rowerowa [Wrocław Cycling Initiative]
 56. Związek Stowarzyszeń Forum Lubelskich Organizacji Pozarządowych [Forum of Lublin NGOs Association Alliance]

57. Związek Stowarzyszeń Kongres Ruchów Miejskich [Urban Movement Congress Association Alliance]
58. Związek Stowarzyszeń Polska Zielona Sieć [Alliance of Associations Polish Green Network]

