

Social Climate Plan as an instrument for structural change? Comments on the draft Plan

ANALYSIS
REFORM INSTITUTE

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Key recommendations

Technical assistance and general comments:

- establishment of a national Energy and Transport Poverty Observatory within existing institutions;
- developing a public policy (strategy) to combat energy poverty and transport poverty;
- a declaration on the allocation of remaining ETS2 revenues to objectives complementary to the SCP measures.

Direct support:

- abolition of the age criterion;
- priority for coal-heated households;
- removal of the requirement to use vouchers for specific purposes;
- supplementing and developing the Central Register of Building Emissions.

Buildings:

- maintaining funding for the "Clean Air" programme after minor adjustments;
- defining the division of tasks and possible synergies related to advisory measures in the sector, as well as increasing the ambition of the SCP in this regard;
- extending the group of beneficiaries of building renovation from the regional component to all people at risk of energy poverty living in multi-family buildings heated individually or locally with coal;
- prioritising investments outside the largest cities in the Social and Municipal Housing Programme and linking them to the criterion of living in areas most at risk of transport poverty.

Transport:

- shifting funds and ambitions from railways to more precise tools for combating transport poverty – bus services and transport on demand.

Micro-enterprise sector:

- add to the definition of micro-enterprises in difficulty the criterion of difficulty in self-financing investments or obtaining funds from the private sector;
- supplementing the support criteria with the emissions of the heat source – making the threshold for the percentage of heating fuel costs in revenue dependent on the emissions of the heat source;
- greater emphasis on the energy effect of measures.

Communication measures:

- joint communication of the SCP and ETS2;
- further definition of the communication strategy in terms of a time frame, scope of financing and links with the technical assistance component.

1. Introduction

The aim of this study is to draw attention to the most important areas requiring improvement in the Polish Social Climate Plan. The publication presents key comments submitted by the Reform Institute during public consultations held in June 2025.

The Social Climate Plan (SCP) is a document that will give Poland access to up to €11.4 billion from the Social Climate Fund¹. According to Regulation (EU) 2023/955 of the European Parliament and of the Council (EU) 2023/955 on the establishment of the Social Climate Fund, the SCP should identify measures to support households, transport users and micro-enterprises that will be affected by the entry into force of the ETS2 system, as well as by existing and exacerbated energy and transport poverty.

The Reform Institute has been preparing recommendations on the process of developing and the content of the SCP for years in order to improve the quality of public policy-making related to energy and transport poverty and to increase the effectiveness of spending available funds. During this time, we have established and continue to coordinate a group of non-governmental organisations interested in the SCP and ETS2 and have organised numerous [events](#) on this issue. We have also actively participated in the Working Group for the preparation of the SCP coordinated by the Ministry of Funds and Regional Policy, taking advantage of the openness of public administration to cooperation. Furthermore, we have participated in expert discussions at the EU level, presenting the Polish perspective.

In addition, we have published three comprehensive publications on the SCP and ETS2:

- [Social Climate Fund – billions to combat energy and transport](#) (2024);
- [Overcoming energy and transport poverty. How to prepare a Social Climate Plan?](#) (2025), available only in Polish;
- [Overcoming energy and transport poverty. The Social Climate plan as an instrument for systemic change](#) (2025), available only in Polish.

Based on the above reports, the work carried out in their preparation and numerous meetings held in recent years, we have compiled the most important comments on the draft document. We have divided them into five key areas of comments – cross-cutting (including those relating to the creation of a strategic framework for sustainable change), measures in the buildings and transport sectors, direct support and support for micro-enterprises. It is worth noting that these are not all of the complex proposals submitted by the Reform Institute to the SCP. Some of the comments were taken into account at an earlier stage of the work of the Working Group of the Ministry of Funds and Regional Policy on the preparation of the SCP.

¹ Basic definitions and context for the creation of the SCF are available in: Stefańczyk, A., Śniegocki, A. and Wetmańska, Z. (2024), *Social Climate Fund – billions to combat energy and transport poverty*, Warsaw, Poland: Reform Institute.

2. Cross-cutting comments, including on technical assistance

For years, Poland has lacked a strategic and coherent approach to diagnosing, monitoring and solving the problem of energy and transport poverty, both in terms of data collection and the development of holistic policies to alleviate these problems.

Although the Social Climate Plan contains a comprehensive diagnosis and a plan for numerous investments aimed at combating poverty, it is insufficient in terms of budget size, time frame (only until 2032) and the catalogue of measures to address the enormous and multidimensional needs. The deadline for submitting the SCP to Brussels (30 June 2025) limits the scope for significant improvements to the document. Furthermore, the SCP lacks measures (reforms) that would strengthen the sustainability and effectiveness of investments with a limited budget. Therefore, the SCP should include cross-cutting measures that demonstrate a commitment to further qualitative analysis and the development and improvement of policies related to energy and transport poverty.

The cross-cutting comments submitted by the Reform Institute have been divided into three categories in this chapter: general, technical assistance and communication strategy.

We recommend adding several cross-cutting measures to the technical assistance section, which is particularly important for the effective implementation of the SCP. One of these is the establishment of **an Energy and Transport Poverty Observatory** (or Energy and Transport Accessibility Observatory). To ensure the effectiveness of this measure, it should be established within the system of existing public institutions, e.g. the Institute for Urban Development and Development, the Polish Economic Institute, the Institute for Environmental Protection or the National Fund for Environmental Protection and Water Management. In the long term, the Observatory would allow for:

- integrate existing knowledge, data and experience in key areas;
- continue diagnostic and advisory work for the administration, laying the foundations for the development of effective data-driven policies;
- participate in the monitoring and evaluation of the SCP;
- offer technical assistance to decision-makers and institutions at various territorial levels.

The second key recommendation of the Reform Institute, closely related to the previous one, is to create two separate **public policies (strategies) to combat energy and transport poverty** in accordance with the Act of 6 December 2006 on the principles of development policy. The public policies would define policy measures, measurable targets and institutional frameworks for policies in these areas beyond 2032. This would be a complementary and extending tool to the SCP, which would identify all sources of funding and planned and existing national measures in these areas. These documents should clearly indicate the system for its implementation and monitoring. We propose the following objectives for this measure:

- the creation of a unified institutional framework for obtaining quality data, including the definition of responsibilities for its collection;
- the creation of an institutional system of cooperation and dialogue between public administration, local governments, non-governmental organisations and industry associations;

- developing a national action plan to respond to the challenge of implementing the ETS2 system;
- proposing specific holistic objectives, measures and reforms in policies to combat energy and transport poverty, including:
 - designing a coherent advisory system in the building sector;
 - systematising a coherent system of benefits and allowances related to these phenomena.

Furthermore, we recommend that the SCP should provide clearer guidance on how the ETS2 will be implemented. The document should include a statement on how the remaining ETS2 revenues will be allocated to objectives complementary to the SCP. This would send a clear signal to the public and the business community about how the ETS2 will be implemented, thereby increasing the predictability of changes. Another area where the ETS2 context should be more clearly reflected is the communication and education strategy. The SCP and ETS2 should be communicated together to increase public understanding and acceptance of changes in the transport and buildings sectors.

Among other cross-cutting comments on the SCP, the Reform Institute also included, among other things special consideration in the composition of the SCP Monitoring and Implementation Group for representatives of local government in areas most at risk of transport and energy poverty; ensuring better consistency with other national actions and strategies; ensuring the availability and transparency of data on the progress of the objectives; clarifying the communication strategy framework, including the time frame, scope of financing and links to the description of the "Technical Assistance" component.

2.1 General comments

Table 1. General comments of the Reform Institute.

Subsection	Page	Content of comment	Justification
1.1.2.	11	A directional and descriptive indication of the desired objectives for spending ETS2 budget revenues, going beyond the allocation from the SCF, as well as a preliminary description of how these funds could supplement the activities included in the SCP.	The SCP should include a declaration on the allocation of remaining ETS2 revenues for purposes consistent with the SCP. These are funds that can complement the measures included in the SCP, and indicating this fact at the SCP stage will send a signal to the entire community and society that the SCP is not the only source of funding for combating transport and energy poverty and preparing for the implementation of the ETS2 system. This will help to gain public support for the changes being introduced and increase the predictability of the ETS2 implementation process, which is inextricably linked to the SCP.
1.1.3.	12	Supplementing the objectives of measures and investments.	<p>The objective "Counteracting the effects of ETS2 implementation in the context of transport poverty" should also be extended to include energy poverty.</p> <p>The objective of "Reducing the number of households affected by energy poverty" should also be extended to include households affected by transport poverty.</p> <p>The objective "Reducing CO2 emissions from residential buildings" should be extended to include reducing emissions in the transport sector.</p> <p>The objective of "Reducing the impact of ETS2 in terms of heating fuel costs incurred by micro-enterprises in their operations and reducing CO2 emissions from commercial buildings" should be extended to include reducing the dependence of micro-enterprises on fossil fuels.</p>

4.1.	314	Ensuring public access to data on the achievement of milestones, targets and indicators.	In its current form, the chapter on monitoring and implementation of the plan provides for the transmission of data on milestones, targets and indicators to an ICT system maintained by the Ministry of Finance, Development and Technology. We believe that this data should be publicly available, which will increase the transparency of the Social Climate Fund and may contribute to improving the Fund's image among citizens.
4.1.	315	Inclusion of representatives of local government in areas particularly affected by transport and energy poverty in the composition of the SCP Monitoring and Implementation Group.	It is very often the local government that has the necessary experience and can see the effects of measures planned at national level most quickly, particularly in the context of transport and energy poverty. Its perspective will be an important complement to that of the regions in assessing the implementation of the SCP.
4.2.	316	Describe the consistency of actions in the SCP with the update of the National Energy and Climate Plan, the National Building Renovation Strategy, as well as with the most important sectoral initiatives, such as changes to the Clean Air Programme and the proposed reform of the Act on Public Transport in the area of combating transport exclusion and poverty.	A clear presentation of the document's consistency with other key initiatives will increase its transparency and holistic nature, and thus its effectiveness.

2.2 Comments on technical assistance

Table 2. Comments of the Reform Institute on technical assistance activities.

Subsection	Page	Content of comment	Justification
2.4.2.1.1.	290	<p>Addition of a separate measure or sub-measure under technical assistance within the measure "Effective implementation of the Social Climate Plan" under technical assistance entitled: "Establishment of an Energy and Transport Poverty Observatory" or "Establishment of an Energy Poverty Observatory" and "Establishment of a Transport Poverty Observatory".</p>	<p>As part of technical assistance, an appropriate unit should be created within the system of existing public institutions (e.g. within Institute for Urban Development and Development, the Polish Economic Institute, the Institute for Environmental Protection or the National Fund for Environmental Protection and Water Management) to continue diagnostic and recommendation work on energy and transport poverty and to monitor and evaluate the implementation of the SCP. It would also be a key unit for integrating knowledge and improving the quality of data related to these areas. It would also contribute to the implementation of other measures included in the "Effective implementation of the Social Climate Plan" and its creation could be a milestone in the action. An observatory established at national level could systematically support public administration with its expertise in areas other than the implementation of the Social Climate Plan, including by developing a holistic strategy to combat both phenomena, going beyond the time horizon and financial capabilities of the Social Climate Plan. This would be in line with the recommendations of the European Commission contained in the publication "Support for the implementation of the Social Climate Fund. Note on good practices of public consultation for the Social Climate Plans".</p> <p>If deemed more effective, the establishment of separate observatories for energy and transport poverty in separate or the same institutions could also be considered.</p> <p>In the absence of sufficient funding under the SCF allocation and the 2.5% limit for technical assistance, it is worth considering the use of the provision of the Regulation on the establishment of the SCF: "include in their plans, as estimated total costs, payments for additional technical support in accordance with Article 7 of Regulation</p>

			(EU) 2021/240 and the amount of the cash contribution for the Member State module in accordance with the relevant provisions of Regulation (EU) 2021/523 of the European Parliament and of the Council (31). These costs shall not exceed 4% of the maximum financial allocation under the plan, and the relevant measures specified in the plan shall be in accordance with this Regulation.
2.4.2.1.1.	290	Addition, under technical assistance, of a separate measure or sub-measure within the measure "Effective implementation of the Social Climate Plan" entitled: "Development of public policy on minimising transport poverty".	<p>As part of technical assistance, we recommend developing a public policy on minimising transport poverty as a separate milestone. This document will allow for a comprehensive approach to the problem of transport poverty in Poland. The adoption of the policy will create a framework for better planning of transformation measures, including addressing issues related to a just transition over a period longer than the duration of the SCF. The development of such a document should be linked to a system for its implementation and monitoring.</p> <p>Public policy on combating transport poverty would be an element linking current measures set out in existing strategic documents on transport and mobility with a long-term time horizon. A strategic document is necessary to identify gaps in current transport policy for people in difficult situations and at risk of being affected by ETS2. It will also help to address the problem of transport exclusion, which is a key element of transport poverty. Such a document should take into account the mobility dimension by linking transport planning with spatial planning. This approach could lead to the organisation of public services in the place of residence as an alternative to creating new bus or rail connections. In addition, the document should identify good practices from existing solutions in Poland that are worth scaling up. In this spirit, it is worth considering well-functioning public transport in exemplary county-municipal and county associations. The subregional level, which most often connects several peripheral municipalities with a larger urban centre that is a local service centre, place of employment and/or transport hub, is of significant importance in solving the problem of transport poverty. It seems reasonable to analyse the potential for action at the sub-</p>

			<p>regional level (at least at the district level) to ensure proper coordination of investment and planning of services and connections.</p> <p>The document should not only broaden the diagnosis of the situation but also propose specific measures and reforms of the transport system in Poland. Such a document will allow for the continuation of analytical work and the effective use of new EU and national funds for a fair and green transition. The preparation of such a document will be an important contribution to subsequent updates of the National Energy and Climate Plan and other national strategic documents (including those strictly related to transport).</p>
2.4.2.1.1.	290	<p>Addition of a separate measure or sub-measure under technical assistance in the measure "Effective implementation of the Social Climate Plan" entitled: "Development of public policy on minimising energy poverty".</p>	<p>As part of technical assistance, as a separate milestone of the measure, we recommend developing a public policy on combating energy poverty. This type of strategic document will allow for a comprehensive approach to the issue of energy poverty in Poland. The adoption of the document will create a framework for better planning of transformation measures in Poland, including the appropriate addressing of issues related to a just transition over a period longer than the duration of the SCF.</p> <p>National strategies to combat energy poverty adopted by Greece, Spain, Ireland, Italy, Portugal and Slovenia could serve as a source of inspiration for the document. The development of such a document should be linked to a system for its implementation and subsequent monitoring of actions. Public policy on minimising energy poverty would be a connecting point between the and current measures set out in the updated NECP and the Social Climate Plan with a broader time horizon. This document will allow for the continuation of the analytical work carried out during the preparation of the Plan.</p> <p>The preparation of a comprehensive national policy on minimising energy poverty will outline a new schedule of measures aimed, among other things, at confirming the existing definitions (or, if necessary, introducing appropriate amendments); developing the diagnostic work from the adopted Plan, including issues related to additional indicators, objectives and conditions for studying the phenomenon; clearly defining</p>

		<p>responsibilities for combating the phenomenon and collecting data; creating a unified framework for obtaining quality data and commissioning and aggregating studies on the phenomenon, which will be available on a specially created publicly accessible website (modelled on the EU Energy Poverty Advisory Hub); creating a permanent institutional framework for cooperation and dialogue on combating energy poverty between relevant public administration bodies, local governments, non-governmental organisations and industry associations; designing a coherent energy advisory system, drawing on existing experience; systematise and propose a coherent system of benefits and allowances related to energy poverty.</p> <p>The preparation of such a document will be an important contribution to subsequent updates of the National Energy and Climate Plan and other national strategic documents. It will also allow for the effective use of new EU and national funds in the coming years to support a just green transition.</p>
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2.3 Comments on the communication strategy

Table 3. Comments of the Reform Institute on communication activities.

Subsection	Page	Content of comment	Justification
4.6.	324	Supplement the SCP with key information on <i>the communication strategy for the Social Climate Plan</i> , including its time frame, scope and key topics to be covered by information activities (mainly the	The Social Climate Plan refers to social communication in general terms. The announcement of <i>the Social Climate Plan Communication Strategy</i> being prepared by the Ministry of Finance, Development and Technology is a positive sign, but important information related to this document is missing. Effective and comprehensive communication is a prerequisite for the acceptance and legitimacy of actions related to the energy and climate transition. The lack of specifics regarding information and

		introduction of ETS2 and its impact on costs).	communication activities weakens the consistency of the SCP with future documents and reduces its credibility as a tool supporting the reform related to the introduction of ETS2. The plan does not mention crisis communication, which should be part of the communication strategy, especially in the context of the risk of declining public acceptance, misinformation about ETS2 and the possibility of sceptical narratives about climate change emerging.
4.6.	325	Introduction of an additional communication objective: "Increasing public understanding of the objectives and impact of the ETS2 system on energy and fuel prices and the role of the SCP as a protective mechanism against these changes."	Without a clear explanation of the ETS2 mechanism and the role of the SCP, there is a high risk of misunderstanding or even public resistance to systemic reforms. Public education in this area is essential to build acceptance for the climate and energy transition. Communication should not be limited to providing information about the available instruments and their benefits but should also actively counter misinformation and strengthen the legitimacy of the transformation objectives.
4.6.	325	Clarify that communication to the target group "all citizens" also includes measures tailored to people with disabilities, older people and people with low digital skills.	These groups may have limited access to digital communication channels and require adaptation of tools and forms of communication in accordance with applicable accessibility rules.
4.6.	325	Add local social organisations, social assistance centres and municipal offices to the list of communication channels.	Locally active entities can act as intermediaries in reaching the end users of the designed mechanisms (beneficiaries). Taking them into account will allow for better tailoring of the message and communication tools. People at risk of energy and/or transport poverty may also be digitally excluded. The inclusion of local institutions and non-governmental organisations as channels of outreach will increase visibility and thus the effectiveness of communication with these groups.
4.6.	326	Indication of the approximate budget for communication activities and	The plan announces that the estimated communication budget will be supplemented at a later stage of the work. However, it does not indicate a time frame, scope of funding or

		linking it to the development of the "SCP Communication Strategy".	link to component C4 (Technical Assistance), which shows the total budget for all activities aimed at the effective implementation of the SCP, including information and communication activities. However, it is not possible to identify funds strictly for information and communication activities from the total budget of the CR component (EUR 381,300,882), which are listed among other support activities, such as training for staff and beneficiaries, monitoring of plan implementation, and expenditure on preventing irregularities and fraud. There is also no link between the communication budget (or the date of its estimation) and the development of the SCP Communication Strategy. The lack of such information limits the transparency of the preparation process and makes it difficult to assess whether communication activities will be adequately planned and financed.
4.6.	324	Specify the timeframe and frequency of surveys on the public's knowledge of the SCP and its objectives as part of the monitoring and evaluation of communication activities.	Monitoring should be launched as soon as possible and begin with an initial assessment of the public's level of knowledge about ETS2. Early diagnosis of the "baseline" level of public knowledge and beliefs about the implementation of ETS2 will enable the preparation of an effective communication strategy and a reliable assessment of the effectiveness of information activities. A clear definition of the scope, schedule and frequency of surveys will increase the transparency and credibility of activities to monitor changes in beliefs and attitudes, as well as to plan appropriate communication activities.

3. Comments on direct income support

In Poland, a universal energy price freeze is a frequently used tool of state support for citizens. At the same time, the system of benefits and allowances for energy-poor people is underfunded, inconsistent and uncertain in the long term. At the end of 2024, the one-off payment of the so-called energy voucher for people on low incomes came to an end. This approach is ineffective – with a limited state budget, support should go to those most at risk of poverty, rather than to all citizens, so that it can really improve their situation. Furthermore, there is a lack of systemic thinking, which results in a lack of predictability and systematisation in this area of state intervention.

We consider direct income support included in the SCP to be a key tool for implementing the ETS2 system in Poland and for providing temporary support to those most at risk of energy poverty while awaiting investments in the modernisation of the building sector. What is more, it builds an image of a fair climate and energy policy that takes into account social challenges and protects those in the most difficult situations. In this way, it builds public acceptance for the green transition.

We propose changes to the criteria of this instrument to better reflect the idea of a just transition and more effectively support those in the most difficult situations, including:

- **Eliminating age as a criterion**

People who have not yet reached retirement age are already or may in the future be at risk of energy poverty in the face of the next stage of the transition and also require direct support.

- **Introduction of differentiated support levels depending on the fossil fuel used – priority for coal**

The impact of the ETS2 system on households using coal for heating will be much greater than on those using natural gas. Differentiating the level of support will allow the group of beneficiaries to be expanded.

- **Removal of the requirement to use the voucher for specific purposes**

Support should not force the maintenance of demand for fossil fuels. Increased flexibility will allow beneficiaries to use it for transport services, reducing the risk of transport poverty.

In addition to changes in the support criteria, we also recommend that the SCP include: active updating, verification and **development of the Central Building Emissions Register (CEEB)**, as well as signalling **plans to support energy-poor people who will not be directly affected by ETS2**, from other revenues from the sale of allowances in the ETS2 system (outside the SCP).

Table 4. Comments of the Reform Institute on direct income support.

Subsection	Page	Content of comment	Justification
2.3.2.1.1.	272	Elimination of age as an eligibility criterion.	<p>The introduction of age as an eligibility criterion is contrary to the idea of a just transition. People who have not yet reached retirement age are already or may in the future be at risk of energy poverty in the face of the next stage of the transition and also require direct support. According to the diagnosis set out in the SCP draft (pp. 40-41, among others), in addition to households living on pensions and disability benefits, the following groups are also particularly at risk: those living on other social benefits, single-person households, large households (especially those with 5 or more members) and persons with disabilities. Eliminating the age criterion, even if it means reducing the level of support for individual beneficiaries, will ensure greater fairness of the instrument and greater public support for it.</p> <p>In addition, the introduction of an age criterion reduces the effectiveness of measures to support single women (identified in the project as particularly vulnerable) who have not reached retirement age and are at risk of energy poverty, as they will not be able to receive direct support.</p>
2.3.2.1.1.	272	Inclusion of a possible direction for direct support for energy-poor people without individual or local fossil fuel heating sources, from revenues from the sale of allowances in the ETS2 system, exceeding the SCF and national contribution.	All persons identified as energy poor should receive income support under the concept of a just transition. In addition, some of them face transport poverty. Due to the limited allocation and the lack of direct impact of ETS2 on their budgets in the context of the building sector, the SCP should include the intention to finance support for them from other budget revenues from the EU ETS (ETS1) and/or ETS2 (excluding the part from the SCF).

2.3.2.1.1.	272	Introduction of differentiated support levels depending on the type of fossil fuel used for heating.	Estimates by the Reform Institute included in the SCP project diagnosis (available in Polish, p. 50 https://ireform.eu/s/uploads/SFK_PSK_Raport_IR.pdf) show that the scale of the impact of the ETS2 system on households using coal for heating will be much greater than the scale of the impact of the ETS2 system on households using natural gas for heating. Differentiating the level of support depending on the type of fossil fuel used will increase the effectiveness of this financial instrument and allow for better, more efficient use of the limited resources available for direct support. Furthermore, according to estimates by the Reform Institute (available in Polish, p. 52 https://ireform.eu/s/uploads/SFK_PSK_Raport_IR.pdf), the additional cost associated with the implementation of ETS2 by 2030 for heating a house with a heated area of 76.99 m2 with natural gas may amount to approximately PLN 350 per year. This amount is many times lower than the support estimated later in the description of the component, which is approximately PLN 1,200 per year. For the effective use of the allocation, it is worth reducing support for gas-heated households so that the freed-up funds can be used to expand the eligible group of recipients.
2.3.2.1.1.	273	Add a sub-measure related to the active updating, verification of entries and improvement of the Central Register of Building Emissions (CEEB).	Basing the direct support component on the CEEB requires active measures to continuously improve the quality of this database so that the beneficiaries are those who are actually eligible for support.
2.3.2.1.1.	273	Removing the requirement to use the voucher for specific purposes or restricting its use to energy or fuel suppliers.	While direct support should minimise the negative social and economic effects of electricity price increases on households affected by energy poverty, it should not force the maintenance of demand for fossil fuels by limiting the use of support to the purchase of energy or fossil fuels. Furthermore, increasing the flexibility of direct support spending by beneficiaries will allow them to allocate it to transport services, reducing the risk of transport poverty.
2.3.4.	286	Monitoring of targets for the number of households in difficult	Currently, the targets monitored under Component C3 – Direct support focus mainly on the number of energy vouchers issued. While the issuance of vouchers is a necessary

		<p>circumstances also for the years between 2026 and 2031. Consider monitoring the indicator annually or biennially during the programme period.</p>	<p>condition for the programme to work, it is not sufficient to monitor the actual impact of the programme on the achievement of the SCP objectives. Indicator C3.IS.M1.7.2031Q4, concerning the number of households in difficult circumstances that have received income support, is much more important, but in its proposed form, its values will only be monitored at the end of the programme. It is reasonable to monitor these values throughout the programme so that corrective measures can be taken if the target values are not achieved. These values should be monitored annually or at least every two years.</p>
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4. Comments on measures in the buildings sector

In Poland, energy poverty stood at 10.47% in 2022². According to the SCP draft published for consultation, as many as 25% of single-family homes have no external wall insulation, and around 47% are heated by boilers below class 5 using solid fuels³. A recent report by the Reform Institute and Renovation Wave estimates the scale of funding required for building renovation by 2035 at approximately PLN 550 billion⁴. These enormous needs will become even more pressing with the implementation of the ETS2 system.

Therefore, in measures concerning the building sector, we recommend maintaining, in accordance with the SCP draft, the co-financing **of the "Clean Air" programme**, which is an important instrument for reducing energy demand and decarbonising single-family buildings for people on lower incomes. It is therefore important in reducing the additional costs associated with the implementation of ETS2.

However, we propose adjustments to the version presented in the SCP, including, among others:

- supplementing information on the special path in the "Clean Air" programme under the component financed from the SCF;
- increasing access to the highest level of funding for low-income households in buildings with an energy demand index of EU <140 kWh/m²/year;
- replacing the ban on support for production outside the EU with additional incentives for producers;
- supplementing the reform of the banking pathway with an analysis of possible ways to increase its accessibility and attractiveness;
- defining the differences between the new component of the programme financed from the SCF and the current version of the "Clean Air" programme in order to demonstrate compliance with the additionality principle;
- increasing the planned energy effect of the investment (average decrease in the primary energy indicator).

As part of investments in **the renovation of multi-family buildings** in the regional component, we recommend expanding the group of beneficiaries beyond "areas where buildings were originally located in the State Agricultural Farm resources" to include all multi-dwelling buildings inhabited by people affected by energy poverty who use individual or local heat sources.

² According to the High Costs, Low Income indicator. Data from: Central Statistical Office, *Energy consumption in households – estimates for 2022*.

³ Ministry of Development Funds and Regional Policy (2025), [Draft Social Climate Plan](#).

⁴ Janik, K., Niewiła-Rej, M., Stefańczyk, A. (2025), *Poland's renovation wave. Benefits for Poland by 2035*. Warsaw, Poland: Renovation Wave.

In the **Social and Municipal Housing** Programme, it is worth considering an additional support criterion, e.g. prioritising investments outside the largest cities and linking them to the criterion of living in areas most at risk of transport poverty.

In our comments on the SCP, we also emphasise the need to add a provision explicitly defining the division of tasks, ensuring complementarity and synergy between measures related to **advice in the building sector** – Clean Air operators, social welfare centre employees, energy/climate advisors. For energy advisors, it is worth considering the inclusion of minimum guidelines that energy advisors must meet and, at the same time, creating dedicated courses for them. **Training for social welfare centre employees** should be extended to include issues related to transport poverty and support tools other than those provided under the SCP.

Other comments made by the Reform Institute included updating and harmonising data and indicators of estimated energy poverty and extending support for energy communities to entities such as social care homes, collective accommodation facilities, educational, health and cultural facilities. In all investments in the sector, it is very important to specify the minimum energy performance requirements. It is also important to determine the extent to which the SCP will contribute to the implementation of the National Building Renovation Plan and the objectives of the Energy Performance of Buildings Directive (EPBD).

4.1 Diagnosis

Table 5. Comments of the Reform Institute on the diagnosis in the building sector.

Subsection	Page	Content of comment	Justification
1.1.2.	11	Ensuring complementarity and synergy between measures in the SCP related to advice in the building sector – the Clean Air Programme operators, employees of Social Welfare Centres, energy/climate advisors.	<p>The list of measures in the building sector includes desirable instruments for advice and training – operators of the Clean Air Programme, training for Social Welfare Centre employees, energy/climate advice through a network of advisors in local government units. To make these actions more effective, it's worth setting clear tasks and goals for these instruments and making sure that the people providing advisory services work together effectively.</p> <p>To this end, it is also worth considering adding a measure to the SCP concerning the preparation, as part of the implementation of the SCP, of a coherent national advisory system for energy-poor people, building on existing experience, in order to increase the effectiveness of measures during and after the implementation of the SCP.</p>
1.4.	21	Add information about the year in which energy poverty affected "12% of the Polish population" and consider, for the sake of consistency, the consistent use of the number or percentage of households.	Increase the precision and clarity of the document. According to the Statistics Poland, the LIHC indicator for 2022 stood at 10.47%.
1.4.	21	Update the data in the chart "Energy poverty rates in Poland" to present the latest figures published by Statistics Poland (High Costs, Low Income: 10.47%, Double median energy expenditure (2M): 19.32%,	The need to ensure the best possible diagnosis of the energy poverty problem in the SCP, also in the context of justifying the investments and measures described below.

		Ability to pay bills on time (Bills): 1.13%)	
1.4.	21	Replace "According to the Efficiency Directive, energy poverty is measured by the arithmetic mean of four indicators" with "According to the Efficiency Directive, energy poverty can be measured by the arithmetic mean of four indicators".	In accordance with the Directive, EU Member States may develop their own energy poverty indicator.
1.4.	22	Consistency and clarification of the document in terms of indicators (and therefore the scale) of estimated energy poverty.	Need to ensure clarity of the document, also in the context of justifying the investments and measures listed below. The document indicates both a LIHC measure of 12% (p. 21) and 9.05% for 2019 (p. 22). The hierarchy of these measures and their subsequent use is also not indicated. It is also worth using the latest available data and compiling it for all the indicators mentioned in the document in a single table or chart.
1.4., 1.5.	31	Presentation of the impact using income deciles rather than quintiles.	We suggest considering the presentation of data based on decile groups rather than quintiles, as this allows for a more precise determination of the impact of ETS 2 on individual income groups and, consequently, more efficient calibration of measures under the SCP.
1.5.	39	Improvement in the growth rate of the number of households in energy poverty in 2023-2032, as well as improvement in the description of the modelling results in the table for the WAM+ETS2 scenario.	The increase according to the table for WAM+ETS2 in the given years is 0.14 million households, not 0.3 million as indicated. Furthermore, the modelling result described – comparing values between 2023 and 2032 without taking into account the jump to 2026 (before the introduction of ETS2) – may

			lead to an incorrect interpretation of the data. It should be made clearer that the increase between 2023 and 2026 is due to factors other than ETS2.
2.1.2.1.1	47	Delete the sentence "The average annual electricity consumption costs of a statistical household are PLN 2,258 (2,523 kWh)" or explain why this information was provided.	The paragraph containing information on average annual electricity consumption costs refers to the heating of buildings and the fuels used for this purpose. The information on electricity consumption for purposes other than heating buildings distorts the meaning of this section of the text as it is not consistent with the rest of the content. It is proposed to delete the sentence "The average annual electricity consumption costs of a statistical household are PLN 2,258 (2,523 kWh)" or to expand it with an explanation of why this information was provided.

4.2 Priority Programme "Clean Air" (I1)

Table 6. Comments of the Reform Institute on investments under the Priority Programme "Clean Air".

Subsection	Page	Content of comment	Justification
2.1.2.1.1.	49	Add information about the special path in the "Clean Air" programme under the component financed from the SCF.	<p>The SCP draft states that "the Priority Programme 'Clean Air' (hereinafter: PPCA) adequately addresses the problems of people affected by energy poverty in terms of investment measures aimed at improving their quality of life".</p> <p>The following wording is proposed:</p> <p>"The Clean Air Priority Programme (hereinafter referred to as CAPP) has the potential to better address the problems experienced by people affected by energy poverty in terms of investment measures aimed at improving their quality of life."</p> <p>At the same time, it should be pointed out that the current version of the programme does not adequately address these problems. According to the programme rules in force since March 2025, the highest level of co-financing, apart from income-related conditions,</p>

			<p>is only available for buildings with an EU demand indicator >140 kWh/m2/year. Buildings with an indicator of, for example, 130 kWh/m2/year are not eligible for such funding, despite their low income.</p> <p>At the same time, it should be emphasised that although the increase in gas heating costs will be less severe than for coal, households currently heated by outdated gas or oil boilers are not eligible for subsidies for the replacement of heating equipment (which is only available for solid fuels). The thermal modernisation allowance for people affected by energy poverty does not constitute such support.</p> <p>The SPC draft also indicates that "PPCA from SCP will be directed to the increased and highest level of funding".</p> <p>Due to the limited budget, it is proposed that the special pathway should first cover households with the lowest incomes and buildings heated directly with coal. These households are most vulnerable to the effects of the introduction of the ETS2 system. Furthermore, in such cases, funding should be paid on condition that comprehensive thermal modernisation is carried out and the heat source is replaced with a low-emission one.</p>
2.1.2.1.1.	50	Improvement of the description of the main objective of the "Clean Air" programme.	<p>The main objective of the "Clean Air" programme proposed in the current version of the SCP is to "improve air quality by reducing greenhouse gas emissions through the replacement of heat sources powered by solid fossil fuels and improving the energy efficiency of single-family residential buildings." The overriding objective is to reduce emissions of harmful substances into the atmosphere that are produced by heating single-family homes with fuels that do not meet emission requirements in outdated domestic boilers/stoves. Since its inception in 2018, the programme has focused on eliminating inefficient solid fuel heat sources. It does not single out fossil fuels. Furthermore, solid fuels authorised for sale must meet the quality standards specified in the legislation.</p>

			<p>It is therefore proposed to replace the above passage with the following text: <i>The main objective of the CAPP is to improve air quality and reduce greenhouse gas emissions by replacing heat sources and improving the energy efficiency of single-family residential buildings heated with solid fuels in obsolete and inefficient heat sources.</i></p>
2.1.2.1.1.	50	<p>Additional incentives for EU manufacturers instead of a ban on support for production outside the EU.</p>	<p>The current draft SCP proposes that <i>in subsequent phases of the CAPP, only heating appliances manufactured in the European Union should be eligible for co-financing, in line with the EU act on a carbon-neutral industry and improving the security of supply chains.</i></p> <p>Making the granting of subsidies conditional on production within the EU, if introduced suddenly and rigorously, could generate the risk of significant delays in the implementation of investments (and, in extreme cases, the impossibility of implementation), which would prolong dependence on imported fossil fuels. Such a solution would require additional analysis of the maximum share of components that can come from outside the EU. A better solution would seem to be the introduction of additional incentives, such as a higher percentage of subsidies for equipment manufactured in the European Union. Such a bonus would provide some support for European industry without distorting the rules of the single market.</p>
2.1.2.1.2.	51	<p>Harmonisation of the programme's savings indicators with the rules of the "Clean Air" programme and definition of what constitutes a "significant" reduction in greenhouse gas emissions.</p>	<p>The current draft SCP states that "measures taken by grant recipients involving the energy modernisation of existing buildings/premises will lead to at least 30% primary energy savings at the level of the CAPP, as well as a significant reduction in greenhouse gas emissions".</p> <p>At the same time, according to the rules of the "Clean Air" programme, the energy demand after the implementation of thermal modernisation projects must be reduced by 40%. There is also no explanation of what constitutes a "significant" reduction in greenhouse gas emissions.</p> <p>It is proposed to adopt the following wording: Measures taken by grant recipients to modernise the energy efficiency of existing buildings/residential premises will lead to a</p>

			reduction in the useful energy demand by at least 40% and a reduction in greenhouse gas emissions by X%. For large grants, even the complete elimination of emissions should be considered.
2.1.2.1.4.	57	Supplement the proposed reform of the bank track with an analysis of how this track should be made more attractive in order to increase its target group among people at risk of energy poverty and the implementation of the ETS2 system in the building sector.	The information provided in the draft SCP that "since the launch of the banking pathway in the CAPP, it accounts for 0.5% of all signed co-financing agreements" indicates extremely low interest in using the banking pathway in the "Clean Air" programme. It is recommended to analyse how this path can be improved to make it more attractive to energy-poor beneficiaries who are particularly at risk of entering ETS2 and to enable them to cover the necessary own contribution to the investment in a realistic manner.
2.1.2.1.6.	60	Supplementing the "additionality" principle with differences between the new component of the programme financed from the SCF and the current version of the "Clean Air" programme.	The SCP draft, under the additionality principle, describes the possibility of combining co-financing with the thermal modernisation tax relief and the already suspended Stop Smog programme. This part of the plan should describe the differences that the SCP component will introduce to the "Clean Air" programme. It is recommended to add a description stating that the SCF will primarily finance comprehensive thermal modernisation in single-family buildings heated with low-efficiency coal-fired heat sources, whose owners meet low-income criteria.

4.3 Social and Municipal Housing Programme (12)

Table 7. Comments of the Reform Institute on investments under the Social and Municipal Housing Programme.

Subsection	Page	Content of comment	Justification
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2.1.2.2.1.	63	Restricting the beneficiaries of investments to persons who meet the criteria for obtaining a flat in the municipal housing stock, in accordance with the criteria determined locally by the municipal authorities on the basis of the provisions of the Tenant Protection Act.	With limited funds available under the SCP budget, people with average incomes should not be given priority support.
2.1.2.2.6.	71	Extending the justification for compliance with the additionality principle by introducing an additional criterion.	In order to comply with the additionality principle and increase the reach of people in the most difficult situations, it is worth considering an additional support criterion, e.g. prioritising investments outside the largest cities, where energy poverty is generally lower. The justification for this investment for the SCP could also be linked not only to the existing criterion in the social and municipal housing, but also by adding the criterion of residence in areas most at risk of transport poverty. The social and municipal housing can be an instrument for combating both energy poverty and transport poverty.

4.4 Programme "Training for Social Welfare Centre (SWC) employees on services for the energy poor" (I5)

Table 8. Comments of the Reform Institute on the programme "Training for social welfare centre employees on services for the energy poor".

Subsection	Page	Content of comment	Justification
2.1.2.5.1.	97	Extension of the scope of the investment "Training for SWC	Many people affected by energy poverty are also affected by transport poverty. As Social Welfare Centre employees are often the first point of contact for people in difficult

		employees..." to include issues related to transport poverty.	situations for various reasons, they should be familiar with the full range of possible support available in various areas of public policy as part of their training.
2.1.2.5.1.	99	Extending the workshop agenda to include other support tools for energy and transport poor people than those provided under the SCP.	The fight against energy and transport poverty will not only be pursued through instruments included in the SCP.
2.1.2.5.1.	99	Deepening the scope of classroom training (e.g. through regular field training) and extending its duration at the expense of reducing the number of trained social welfare centre employees (if necessary due to limited funding).	A one-off, two-day training course is not sufficient for participants to gain an in-depth understanding of the specific nature and possibilities of combating energy and transport poverty and to practise the patterns they have learned in the field in a workshop setting.

4.5 Investments under the regional component – support for building renovation

Table 9. Comments of the Reform Institute on investments under the regional component – support for building renovation.

Subsection	Page	Content of comment	Justification
2.1.2.5.1.	110	Extension of the additional scope of intervention beyond "areas where multi-dwelling buildings originally belonging to the State Agricultural Farms are located" to include all multi-dwelling buildings inhabited by people affected by energy poverty	All multi-family buildings occupied by households affected by energy poverty that use individual or local heat sources should have access to investment support due to the existing risk of energy poverty and the upcoming direct additional costs associated with the introduction of ETS2.

		who use individual or local heat sources.	
2.1.2.6.1.	111	Indication of the minimum energy performance requirements considered in the instrument.	In accordance with the draft National Building Renovation Plan, we must strive to promote the thorough renovation of buildings as quickly as possible (i.e. to the level of a zero-emission building standard, and where this is not technically and economically feasible, to the level of a nearly zero-energy building).
2.1.2.6.1.	111	Clarification of whether the support will also cover residential buildings with municipal and social housing that are supplied with district heating from a local heating system that will be covered by the ETS2 system.	The current wording, "The final recipients of the support will be people affected by and at risk of energy poverty in connection with the introduction of the ETS2 system in the buildings sector", does not allow for an unambiguous interpretation of the conditions for obtaining support.
2.1.2.6.1.	112	Clarification of whether efficient district heating networks covered by ETS1 are understood as efficient heating systems within the meaning of the EED Directive, and also whether, in such a case, buildings supplied with district heating from a heating system covered by ETS1 that does not meet the criteria for an efficient heating system under the EED Directive are eligible for support under the measure?	The current wording, "Support will be targeted at buildings not connected to efficient district heating networks covered by ETS1", does not allow for interpretation of the conditions for obtaining support. At the same time, it should be noted that support from the SCP should be directed primarily at buildings that will be covered by the ETS2 system.

4.6 Investments under the regional component – educational and energy/climate advisory activities as part of support for a network of climate advisors employed in local government units (17)

Table 10. Comments of the Reform Institute on investments under the regional component – educational and energy/climate advisory activities as part of support for a network of climate advisors employed in local government units.

Subsection	Page	Content of comment	Justification
2.1.2.7.1.	120	Emphasise the role of building climate resilience in the section on education and advice as a complement to investment measures.	In the context of climate change, it is important to raise public awareness of how climate change is affecting and will affect our lives and how we can prepare our infrastructure and buildings for this. In the context of buildings, elements such as adaptation to higher temperatures and heat waves, more frequent fires, floods and storms will be particularly important.
2.1.2.7.1.	120	<p>Consideration of a "one-stop shop" formula, which would include not only advice, but also:</p> <ul style="list-style-type: none"> • assistance to potential beneficiaries in submitting applications; • coordination of the process of obtaining support under a given programme; • assistance in finding reliable contractors and technology providers; 	Potential beneficiaries of support instruments may feel discouraged by the complexity of the process of obtaining support and the difficulty of completing the relevant documentation and submitting an application on their own. Providing support and coordination for the process of obtaining financing and providing knowledge about "proven" contractors and suppliers would not only minimise the risk of "horror bills" but would also allow for better energy efficiency results of large-scale thermal modernisation.

		and taking these assumptions into account in the description of the instrument.	
2.1.2.7.1.	121	Establishment of minimum guidelines that energy advisors must meet.	In order for energy advisors to perform their tasks reliably, they must have the appropriate competences. These competences should be verifiable. Requirements such as a minimum of three years of professional experience in the fields of renewable energy sources and energy efficiency could be considered.
2.1.2.7.1.	121	Consider creating a dedicated course and guidelines for applicants and those already working as energy advisors.	The creation of a dedicated course and guidelines for future energy advisors would help to systematise and standardise their work.
2.1.2.7.3.	124	Increase the number of additional advisors hired by increasing the allocation for this purpose.	Energy advisors at the local government level are key to increasing the availability of SCP programmes for people in the most difficult situations. For this reason, it is worth considering increasing the funds allocated for this purpose, which would allow for an increase in the number of additional advisors, and thus increase the effectiveness and efficiency of the implementation of the entire SCP building component.
2.1.2.7.6.	129	Emphasise that the advisors employed will be new, additional positions located in local government units where energy poverty is widespread.	The requirement for additional positions in areas particularly vulnerable to energy poverty will increase the effectiveness of the programme and better align this task with the principle of additionality.

4.7 Pilot Programme – Energy Communities (18)

Table 11. Comments of the Reform Institute on the Pilot Programme – Energy Communities.

Subsection	Page	Content of comment	Justification
2.1.2.8.3.	131	Extending support to local government entities such as social welfare homes, collective accommodation facilities, educational, health and cultural institutions.	Providing support for buildings that provide services to the local community will allow for final assistance to a larger number of people, not limited by the lifetime of the current residents. In addition, due to their larger size, these facilities consume more heat and electricity, which allows for greater environmental benefits.
2.1.2.8.4.	136	Demarcation of investments from other household support mechanisms, in particular "Clean Air" and "My Electricity".	To avoid providing support through this mechanism to beneficiaries who could receive funding from the other two programmes.

4.8 Analysis and overall impact

Table 12. Comments of the Reform Institute on the section "Analysis and overall impact" in the building sector.

Subsection	Page	Content of comment	Justification
3.1.2.1.2.	306	Addition of the assumptions adopted for the purpose of estimating the volume of savings: "Primary energy savings: 878,590 MWh/year.".	<p>According to previously provided information, "NFOŚiGW identifies the need to finance CAPP under the SCP in the amount of approximately PLN 11.25 billion. The estimated achievable indicators are: 129,600 heat sources replaced and 140,000 thermal renovations by Q2 2032" (page 49).</p> <p>This would mean that the average decrease in the primary energy indicator for a single-family building is approximately 52 kWh/m²/year. This is a relatively small primary energy saving, considering that:</p>

			<ul style="list-style-type: none"> • Assistance should be directed to buildings with the worst energy performance • As a result of thermal renovation, the building should achieve the highest possible standard – ultimately at the level of a zero-emission building or a building with almost zero energy consumption. <p>These are also the objectives of the National Renovation Plan and the EPBD.</p> <p>If support were to be targeted primarily at buildings with the worst energy performance (e.g. with a primary energy indicator of >250kWh/m²/year) and the building after renovation achieved an index of 100-150kWh/m²/year, the primary energy savings per building would exceed 100kWh/m²/year.</p>
3.1.2.2.2.	307	Add an estimate of how many of these buildings will achieve energy performance class A (i.e. become zero-emission buildings) after thermal renovation: "Number of buildings renovated in terms of heat source replacement or thermal renovation: 160,000."	<p>In accordance with the draft National Building Renovation Plan, we must strive to popularise thorough building renovation as quickly as possible (i.e. to the level of a zero-emission building standard, and where this is not technically or economically feasible, to the level of a nearly zero-energy building).</p> <p>For this reason, it is worth estimating the extent to which the SFK will contribute to the implementation of the National Building Renovation Plan and the objectives of the EPBD.</p>

5. Comments on measures in the transport sector

In Poland, the issue of the accessibility of public transport services has been raised for years, especially in less urbanised areas. This leads to the social exclusion of residents of smaller towns and forces them to use private transport frequently, which is contrary to the idea of both a fair and green transition.

Therefore, the SCP should be commended for its strong focus on the development of public transport, which is a key instrument for a fair and inclusive plan to combat transport poverty in line with decarbonisation targets.

Our most important comment in the transport sector is to redirect funds from extremely capital-intensive investments in rolling stock to greater funding for more precise tools in the fight against transport poverty – **on-demand transport and bus services** in areas most affected by this phenomenon. This support should not only cover the purchase of rolling stock, but also the organisation of transport and infrastructure development. In the absence of changes in this area, it is worth explaining in the document the reasons behind the more than threefold increase in the financial allocation for rail (EUR 1.9 billion) relative to the total amount earmarked for on-demand transport and bus services (EUR 0.5 billion).

In order to clearly present the current situation and planned measures to reduce transport poverty, it is worth including in the description of the current situation the solutions contained in **the draft amendments to the Public Collective Transport Act** and certain other Acts of 6 June 2025, which concern exclusion and transport poverty. To make the document more accessible, it is worth adding a more detailed description of the methodology used to develop the Transport Service Supply Poverty Index.

Among other comments in the transport sector in the SCP, we propose, among other things, to include in the evaluation the appropriate level of utilisation of the purchased rolling stock within the publicly available transport offer and to guarantee a specific reduction in the number of users in difficult situations. In practice; allowing local governments in the most difficult situation in terms of transport poverty to be pre-selected for advisory activities and given a privileged position in competitions; extending investments in cycle routes to include investments in pedestrian and cycle routes; and adding clear guidelines for the location of investments in cycle routes related to regular journeys by residents, rather than recreational tourist trips.

5.1 Diagnosis

Table 13. Comments of the Reform Institute on the diagnosis in the transport sector.

Subsection	Page	Content of comment	Justification
1.1.1.	6	Harmonisation of the definition of transport exclusion with the draft act amending the act on public transport and certain other Acts of 6 June 2025.	It is important that the Social Climate Plan (SCP) is consistent with other important government initiatives, including draft legislation. This will increase the transparency of the SCP and the effectiveness of the planned measures.
1.2.	15	Add to the description of the current situation a description of the proposed amendments to the Public Transport Act and certain other Acts of 6 June 2025, which concern transport exclusion and poverty.	The solutions proposed in the draft amendment to the aforementioned act (e.g. the definition of transport exclusion, the establishment of a Transport Exclusion Prevention Fund) will have a very significant impact on national transport poverty reduction policy and on SCP beneficiaries in the transport sector.
1.4.	17	Addition of a description explaining the relationship between the concept of transport poverty and communication/transport exclusion.	To ensure the clarity of the document and the presented vision, it is worth explaining the relationship between the concept of transport poverty and communication/transport exclusion, which has appeared much more frequently in expert and public debate in recent years. Also, for consistency with other documents, it is worth referring the proposed definition of transport poverty to the definition of transport exclusion proposed in the draft amendment to the Public Collective Transport Act.
1.4.	18	Add a detailed description of the methodology used to develop the indicator – Transport Service Supply Poverty Index.	Adding a more detailed description of the Transport Service Supply Poverty Index methodology to the SCP will enable independent experts to assist public administration in further improving the estimation of this key and difficult to quantify dimension of public transport accessibility. This methodology can also be published in a separate, publicly

			available document to which the SCP can refer. However, it would be useful for the SCP itself to at least indicate the data on which this indicator is based.
1.4.	20	Use of demographic data in the definition of transport poverty and the identification of areas at risk.	While Subsection 1.4 focuses on the definition of types of poverty and the identification of areas at risk based on income criteria and transport accessibility, given the relatively good identification of groups particularly vulnerable to this type of poverty (young people, older people, women, etc.), it seems reasonable and feasible to examine the identified areas also in terms of demographic structure and the share of particularly vulnerable groups in the population. This would make it possible to identify the areas of intervention with the highest potential priority.

5.2 Investments in the purchase of bus rolling stock (I1), railway rolling stock (I3) and investments under the regional component – railway rolling stock (I9)

Table 14. Comments of the Reform Institute on investments in the purchase of bus and railway rolling stock (I1, I3 and I9).

Subsection	Page	Content of comment	Justification
2.2.2.1.1.	155	Clarification of why the SCP supports the organisation of rail transport rather than bus transport.	The analysis of challenges in the investment description clearly indicates how important it is to increase the accessibility of public transport, especially in smaller towns and rural areas, in order to reduce transport poverty. With limited resources, bus transport is a more effective instrument for combating the issue of public transport accessibility across the largest possible area than the highly capital-intensive railways.
2.2.2.1.1.	155	Explanation of how the investment in the purchase of bus fleets fits into the planned amendments to the	The SCP should present a clear vision for the development of public transport in the context of combating transport poverty (including exclusion). The planned amendments to the Public Transport Act will have an impact on this phenomenon and should therefore be included, at least in part, in the descriptive section.

		Public Collective Transport Act and certain other acts of 6 June 2025.	It is also worth including in the investment appropriate measures related to investment in a properly organised national system of access to information and journey planning, which, in combination with the planned investments, could have a greater effect in increasing the number of people and households at risk of transport poverty.
2.2.2.1.1.	156	Inclusion of the level of rolling stock utilisation in the evaluation of investment implementation.	The evaluation of investments should consider the appropriate level of utilisation of the purchased rolling stock in the publicly available transport offer, i.e. the reduction in the number of users in practice, which will be guaranteed by local authorities through appropriate conditions for the number of services in a given period.
2.2.2.1.3.	156	Clearer admission of pre-selection of local governments that will receive support, according to the criterion of transport poverty.	Competitive procedures often favour local authorities with the largest resources due to their specific nature. Access to investment for local authorities in the most difficult situations should be increased in order to combat transport poverty where the problem is greatest, even if the application is not necessarily the highest-scoring in formal terms.
2.2.2.9.1.	247	Redirect funds from investments in rolling stock to regional on-demand transport and bus transport instruments.	As highlighted in previous comments, given the objective of reducing transport poverty and the limited pool of SCF funds, priority should be given to instruments other than rail transport, including bus transport and on-demand public transport in the most vulnerable areas.

5.3 Investments in the construction and reconstruction of railway stops and stations, including the construction of car parks at stops and stations (12)

Table 15. Comments of the Reform Institute on investments in the construction and reconstruction of railway stops and stations, including the construction of car parks at stops and stations.

Subsection	Page	Content of comment	Justification
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2.2.2.2.	167	Consideration in this investment, as well as in the entire component, of the cost-effectiveness of investments in railway infrastructure and rolling stock.	<p>There are currently over 2,500 stations and stops in Poland and approximately 2,000 locomotives and multiple units at the disposal of passenger rail operators. At the same time, the SCP points to a particular risk of transport poverty in peripheral areas, which are usually poorly connected to railway hubs and lines. However, the SCP does not indicate any investments in railway traction. In this light, the construction or renovation of several dozen facilities, the purchase of 60 zero-emission vehicles or the co-financing of the Railway Fund with EUR 373 million not only seem to have little impact on the condition of Polish railways, but also reward areas that are already connected by existing traction, rather than areas with no access to transport. The individual costs of vehicles, for example, are significantly higher, even 10 times higher than in the case of buses. We recommend considering the legitimacy of financing railway investments in favour of greater support for bus transport and transport on demand.</p> <p>In this investment, as in the entire component, there is a visible lack of plans for financing from other EU funds, structural links between the investment and the implementation and reform of national programmes (Bus Transport Development Fund is mentioned only in passing) or ideas for involving private funds. Given the seriousness of the challenge (the cost of modernising the bus fleet alone is estimated at PLN 30 billion) and the relative modesty of the component budget, it would be advisable to seek synergies with other forms of public and private financing more actively.</p>
2.2.2.2.1.	167	Extension of investments to include infrastructure for bus transport.	Given the greater importance of bus transport in effectively combating transport poverty, it is worth allocating a significant part of the funds earmarked for this investment to bus stops. Railway infrastructure should only be subsidised if it is connected to bus services and/or on-demand public transport.
2.2.2.1.3.	159	Increase investment in bus transport in areas particularly affected by transport poverty.	The figures of 479 zero-emission and low-emission vehicles purchased and 88 charging points are quite low in relation to the needs and scale of the excluded areas. The Polish bus fleet can count on approximately 13,000 city buses, and the cost of its modernisation may exceed PLN 30 billion. The lack of charging infrastructure for electricity is also a major

barrier. At the same time, the unit costs of such investments are significantly lower and better suited to the budget of the component and the identified area-specific conditions of transport poverty (peripheries) than rail transport.

5.4 Investments under the regional component – transport on demand (I6)

Table 16. Comments of the Reform Institute on investments under the regional component – transport on demand (I6).

Subsection	Page	Content of comment	Justification
2.2.2.6.2.	216	Add educational and advisory activities for potential beneficiaries eligible for the programme.	The section on the investment implementation schedule indicates that additional calls for proposals may be launched to expand the group of beneficiaries in order to fully utilise the available funds. However, it is worth first reaching out to local governments most at risk of transport poverty with dedicated information about the call for applications and assistance in submitting applications. The criterion of transport poverty risk, including transport exclusion, should be a priority criterion for selection and should not be relaxed.
2.2.2.6.4.	220	Significantly increase the budget and raise the milestones and targets for investments in transport on demand.	As public transport on demand is a key tool for combating transport exclusion, which is an important component of transport poverty as defined in the EU Regulation establishing the SCF, the allocation for this purpose should be significantly higher than EUR 96 million. The budget and ambition of the programme should be increased at the expense of the allocation for rail transport, which will allow for a more effective fight against transport poverty.

5.5 Investments under the regional component – cycling (I8)

Table 17. Comments of the Reform Institute on investments under the regional component – cycling (I8).

Subsection	Page	Content of comment	Justification
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2.2.2.8.	236	Extension of investment in cycle routes to include pedestrian and cycle paths.	Investing in pedestrian and bicycle routes instead of bicycle routes alone will increase the group of potential beneficiaries of the investment and more effectively meet the programme's objectives.
2.2.2.8.1.	236	Add clear directional requirements for the location of investments in cycle routes.	There is no guarantee that this will be significant from the point of view of organising cycling as a real means of everyday transport, rather than just recreation. As experience in other countries shows, such infrastructure provides the best conditions for using bicycles for everyday transport in a variety of weather conditions. This investment should only be carried out in areas with high transport poverty rates, with priority given to rural areas. Infrastructure should be developed primarily between neighbouring localities where residents regularly travel to access basic services and socio-economic activities (e.g. schools or government offices).
2.2.2.8.1.	236	Clarification of how support for bicycle rental schemes will reduce transport poverty.	Supporting bike-sharing schemes does not appear to be an effective tool for reducing transport poverty in the areas most at risk. Sustainable investments for everyday transport outside larger cities should be supported. Second-hand bicycles are popular in many vulnerable areas, and access to six public bicycle rental schemes may not be an attractive option for changing the situation of households in difficulty. It is worth considering redirecting these funds to other investments.

6. Comments on measures concerning micro-enterprises

The micro-enterprise sector is often overlooked in discussions on the implementation of ETS2 and the creation of the SCP. Micro-enterprises may also face energy and transport poverty. In addition, the upcoming entry into force of the new emissions trading system and the associated increase in operating costs for fossil fuels may be a challenge for them. It is therefore important to provide the most effective support to those in the most difficult situation.

In the comments of the Reform Institute for the micro-enterprise sector, we recommend adding **a criterion to the definition of micro-enterprises in a difficult situation concerning their ability to self-finance investments or obtain financing from the private sector**. According to scientific examples, e.g. [Bobinaite, V., Neniskis, E., Konstantinaviciute, I., & Tarvydas, D. \(2025\)](#), low liquidity or high debt can be taken into account, for example, through a maximum ratio of equity to liabilities or a maximum revenue threshold.

As part of investment support in the building sector for these entities, **we propose making the percentage threshold of heating fuel costs in revenue proportional to the emissions of the heat source** (the more emissions, the lower the threshold). This will ensure that support goes first to companies facing higher costs related to ETS2 (including those using coal). It is also worth considering expanding the role of National Development Bank (Bank Gospodarstwa Krajowego) to include free advice for micro-enterprises before they submit their applications, which will increase the effectiveness of support and tailor it to needs.

We also recommend placing greater emphasis on **the energy impact** of investments, rather than just the number of beneficiaries, when setting criteria and targets for support for micro-enterprises. This could be done by setting a planned energy effect target for the entire investment and linking the repayment of support and the evaluation of the programme to the achievement of an appropriate level of fuel demand reduction.

Table 18. Comments of the Reform Institute on investments and diagnosis concerning the micro-enterprise sector.

Subsection	Page	Content of the comment	Justification
1.5.	43	Addition of an additional criterion concerning low liquidity or high debt to the definition of micro-enterprises in difficulty as set out in the SCP.	<p>In the SCP, a 'micro-enterprise in difficulty' is defined as an entity whose heating fuel purchase costs exceed 5% of its revenue. Although this criterion is important because it indicates the level of potential impact of the ETS2 implementation, it does not seem to be entirely sufficient. It is worth considering making the threshold for the percentage of heating fuel purchase costs in revenue proportional to the emissions of the type of source used and giving priority support to investments in companies that will face higher costs related to ETS2 (e.g. those using coal).</p> <p>Furthermore, this definition does not take into account the ability of micro-enterprises to self-finance investments or to obtain financing from the private sector. Instead, support from the SCF should be limited to micro-enterprises that do not have sufficient creditworthiness and own capital to carry out investments to move away from fossil fuels. This is also indicated by the definition of micro-enterprises in difficulty in Regulation 2023/955, which, in addition to the significant impact of prices on such entities, also emphasises that they 'do not have the means to renovate their buildings or to purchase zero-emission and low-emission vehicles or to switch to alternative sustainable modes of transport'. To this end, it is worth considering adding one of the indicators presented in the publication by Bobinaite, V., Neniskis, E., Konstantinaviciute, I., & Tarvydas, D. (2025). Identifying and Assessing Vulnerable Micro-Enterprises in Lithuania. Sustainability, 17(12), 5405. including the maximum ratio of equity to liabilities (e.g. 0.5 or less).</p>

2.1.2.3.1	74	Specify the conditions for partial loan repayment, in particular the scale of repayment for a given energy effect.	For the predictability of the regulatory environment and clarity of the document, as well as to define the qualitative conditions of the investment by emphasising the importance of the energy effect of the investment in the criteria and general description. It is suggested to include information on the relationship between the energy effect and the amount of redemption.
2.1.2.3.1	74	Linking the granting of support and the evaluation of the programme to the achievement of measurable effects in the form of a reduction in energy demand from fossil fuels, as well as specifying the planned energy effect target for the entire investment.	For the sake of document precision. Addition to the sentence: "In accordance with the SCP assumptions, in 2026-2032, at least 4,825 micro-enterprises in a difficult situation due to the introduction of the next stage of the energy transition will benefit from SCF support for improving the energy efficiency of buildings. As a result, an energy effect of ... will be achieved."
2.1.2.3.1.	75	Extension of the role of National Development Bank to include free advice for micro-enterprises before submitting an application.	Micro-enterprises in a difficult situation may not have sufficient resources and expertise to identify the most needed and effective investments under the programme.
2.1.2.3.3	78	Include for all investment implementation indicators (milestones and targets) not only the number of entities supported, but also the planned energy effect to be achieved.	The adopted cumulative indicators (target values) will indicate the actual number of micro-enterprises receiving support for improving the energy efficiency of buildings and the effects of this support. The achievement of the indicator will be confirmed by a list of micro-enterprises receiving support, together with the energy effect achieved.
2.1.2.3.3	80	Presentation of the method of measurement and the expected	To facilitate reference in consultations with the public and, at a later stage, with the European Commission.

		environmental effect of the investment.	
2.1.2.3.4	82	Providing indicative and preliminary relevant product parameters.	Indicating indicative planned product parameters (maximum value, repayment period, redemption level and conditions, grace period) will increase the predictability of changes and transparency.

Annex 1. Other comments

Table 19. Other comments of the Reform Institute on the SCP.

Subsection	Page	Content of comment	Justification
1.2.	14	Division of the "General overview of the current situation" into sectors described by subheadings (similar to section 1.1.1.).	This will increase the clarity of the document.
1.4.	20	Replace the words "building with a leaking roof" with "people living in buildings in poor technical condition".	Improvement of the document's accuracy.
1.4.	21	Clarification of the document to which the sentence "Energy poverty is measured as the average of four EU SILC indicators and additionally on the basis of the High Costs – Low Income indicator" refers.	Need for transparency and precision in the document.
1.4.	21	Correct the typo in the Eurostat indicator designation: from "ilc_mhod01" to "ilc_mdho01".	To improve the precision of the document.
1.4.	21	Add a source to the information on "EU requirements and standards, such as those adopted by European Energy Poverty Observatory".	Adding information about the publication of the European Energy Poverty Observatory, where the EU requirements and standards referred to can be found, will improve the transparency and accuracy of the document.

1.4.	24	Clarification of the measure for which the average energy poverty in the EU is "6-7%".	For clarity, consistency of the document and formulation of conclusions in terms of investments. According to the average of four indicators, Poland is below the EU average in terms of energy poverty.
1.5.	28	Clarification of the year for which the individual context indicators are specified.	For the accessibility of the document.
1.5.	29	Move the paragraph beginning with the words "Due to the weather conditions prevailing in Poland" to the section of the chapter on energy poverty.	To improve the clarity and transparency of the document; this paragraph only concerns energy poverty and therefore does not constitute an appropriate introduction to the rest of the text.
1.5.	37	Clarification of what is shown in the graphs labelled "coal" and "gas" below the table showing the price path of emission allowances in the ETS2 system.	To increase the clarity and precision of the document.
1.5.	39	Clarification of what it means that the risk of energy poverty in 2030 "will reach 25%".	To improve the precision and consistency of the document.
2.1.2.1.1	47	Delete the words "or eco-design" in the sentence "According to data from the Central Register of Emissions of Buildings, the number of single-family buildings that have only a solid fuel heat source with an emission	The requirements related to the eco-design standard are more restrictive than the requirements of class 5. Single-family buildings with a solid fuel heat source with an emission standard below class 5 will automatically have a heat source that does not meet the eco-design requirements. The following wording is proposed:

		standard below class 5 or eco-design is over 2.8 million in Poland.".	"According to data from the Central Register of Building Emissions, the number of single-family buildings that have only solid fuel heat sources with an emission standard below class 5 in Poland is over 2.8 million.".
2.1.2.1.1	4	Consistency in the presentation of the share of insulated buildings in the total building stock.	<p>The various ways of stating the share of insulated buildings in the total building stock, which change within a single sentence, make the text difficult to understand. It is recommended that this method be made consistent throughout the entire passage or at least within individual sentences.</p> <p>The following wording is proposed: "Every fifth dwelling is located in a building with no external wall insulation, with every fourth dwelling located in a single-family building. Over 40% of dwellings are located in buildings with insulation thicknesses of 5 to 12 cm, and only 25% in buildings with insulation exceeding 12 cm. In addition, every third dwelling is located in a building where the ceiling above the top floor or the attic is not insulated. From the perspective of investment needs, there is a noticeable demand for thermal modernisation work. As many as 41% of single-family home owners indicate a need to insulate their attic or top floor. One in three owners points to the need to insulate walls, replace woodwork and modernise the heating system. Thermal comfort remains a problem in many buildings, especially those that are not insulated. During the heating season, underheating is a problem in every third dwelling, and in buildings without insulation, this share increases to almost half of all households.</p>
2.1.2.1.3	53	Addition of figures to the description of common indicators	<p>The SCP draft states that <i>the implementation of the Programme will contribute to the achievement of the following common indicator: Savings in annual primary energy consumption in MWh/year.</i></p> <p>The given excerpt lacks the value for annual primary energy consumption in MWh/year. It should be added.</p>

2.1.2.2.6.	71	Correct the name "Social and Climate Fund" to "Social Climate Fund".	Consistency of terminology in the document.
2.1.2.3.1.	73	Add an additional criterion concerning the maximum income or turnover to the definition of micro-enterprises in difficulty as set out in the SCP.	Comment on sub-section 1.5 (page 43).
2.1.2.7.1	120	<p>Replace with: <i>"In addition, their actions minimise the risk of negative situations from the perspective of residents, such as poor cost estimates, future bills or the required scope."</i></p> <p>...to: <i>"In addition, their actions minimise the risk of negative situations for residents, such as: inappropriate selection of the scope of renovation works, poor estimation of the necessary investment costs or the amount of heating and cooling bills after thermal modernisation."</i></p>	The proposal aims to make the sentence clearer.
2.2.2.1.1.	152	Clarification of the interpretation of the figure of 15 million people from the UNICEF report cited above.	The estimate of 15 million people referred to the number of people living in municipalities without organised public transport (no funds allocated for this purpose). However, this does not seem to be an accurate estimate in the context of the overall concept of transport exclusion, as a large proportion of these people can use their own vehicles without hindrance, so the number is likely to be lower. The following change is proposed: "According to data from the Transport Exclusion Association cited by UNICEF, it is

			estimated that approximately 15 million people in Poland have limited access to public transport.
2.2.2.1.1.	155	Correction of a typo: "Centrum Unijnych projektów Transportowych" to "Centrum Unijnych Projektów Transportowych"	Document accuracy.

