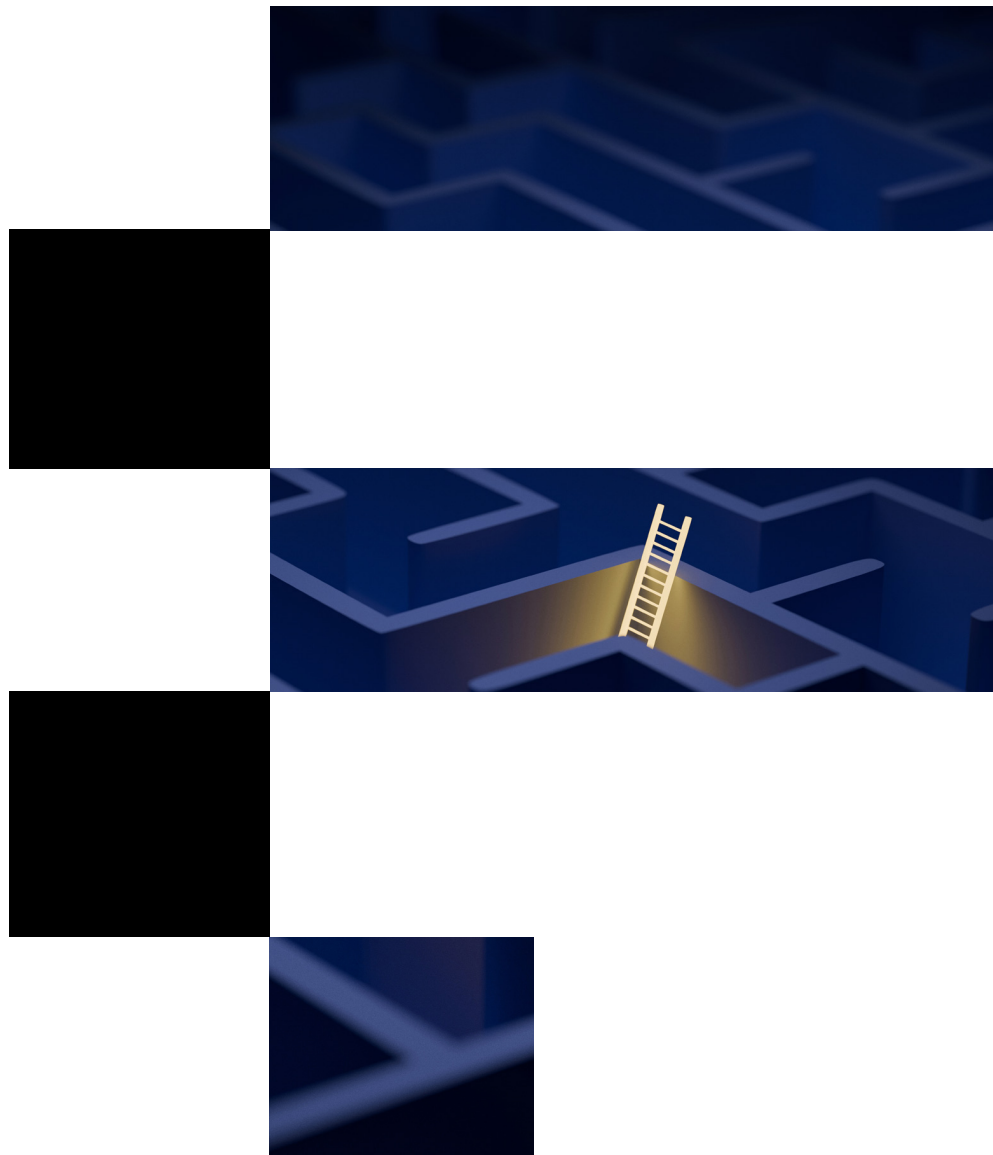


Investments in renewable energy:

Are we finding our way out of the maze of procedures?

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Executive Summary

The development of renewable energy sources in Poland continues to be held back by lengthy environmental, planning, and grid-related procedures. In 2025, the public administration took several steps to shorten these procedures. Work is underway on the digitisation of environmental documentation and the parallel conduct of environmental and planning procedures. Measures are being taken to enable the connection of renewable energy projects to the grid and to facilitate repowering. Renewables acceleration areas (RAAs – REDIII, Art. 15c) have been introduced into the Polish legal framework, and maps of renewable energy potential (REDIII, Art. 15b) have been published. These measures prove a gradual acceleration of the permitting.

At the same time, proposals are emerging that could negatively affect the system's quality. The greatest risk is the concept of tacit consent in environmental proceedings, which could lead to the implementation of projects that are potentially harmful to the environment. Instead, there is a need to strengthen the institutions responsible for environmental impact assessments. There are also concerns regarding the proposed mechanisms for distributing the benefits of wind energy. In the proposed form, the mechanism could lead to unequal treatment of people living near wind farms.

At the EU level, work is also underway on further improvements to the permitting process as part of the revision of the RED Directive¹ and the Environmental Omnibus. The European approach is ambitious and contains detailed guidelines for specific technologies. At the same time, introducing changes to legislation that was updated relatively recently raises concerns about the pace of national transposition and regulatory overlap.

Accelerating the permit-granting procedures is the simplest way to increase the share of renewable energy. Efficient procedures and high-quality decisions prove a country's ability to manage natural resources and technological development whilst respecting the environment. That is why systemic, effective, and transparent solutions are needed.

It is essential to fast-track the draft amendments to the EIA Act ([UD224](#)) and the RES Act ([UC118](#)). It is also important to establish clear rules for the benefit sharing in wind energy projects, with a choice between a community fund, a participatory fund, and the virtual prosumer model.

The improvements being implemented should not have a negative impact on the environment. Therefore, rather than introducing a top-down mechanism of

¹ Renewable Energy Directive – Directive 2018/2001 on the promotion of the use of energy from renewable sources.

tacit consent, it is necessary to strengthen environmental protection institutions, increase staffing levels, and ensure stable funding. It is also important to consistently implement staffing plans in regional environmental protection directorates. In legislative work, it is essential to take EU proposals into account at an early stage to avoid conflicting regulations.

There is a pressing need to establish national guidelines that enhance the predictability of environmental procedures. Such guidelines should be developed in consultation with the industry to ensure they do not act as a barrier to new investment. At the same time, investors must be prepared to make certain concessions that will provide greater predictability without increasing environmental risk.

The full report is available in Polish [here](#). ■

Annex 1

	Regulation/solution	Type of regulation	Status	Assessment	Comment
1	Offshore Act – Mapping the potential of renewable energy sources	National	Adopted, in progress	Positive	A solution tailored to the national context.
2.	Offshore Act – Areas of accelerated renewable energy development	National	Adopted, in progress	Neutral	We do not expect much interest from local authorities.
3.	EIA Act – draft amendment – UD224	National	Planned, work on the act is ongoing	Positive	The Act contains important provisions on strengthening the competences of key institutions, increasing the level of digitisation and improving access to data.
4.	Renewable Energy Sources Act – draft amendment with provisions for wind farms – UD332	National	Planned, work on the act is ongoing	Positive, but... raises concerns	Conducting planning and environmental procedures in parallel is one of the most important measures for shortening the permitting process. The approach to sharing benefits may be discriminatory.
5.	Amendment to the regulation on projects likely to have a significant environmental impact – RD239	National	Planned, work on the act is ongoing	Positive	The regulation will make it possible to increase the capacity of wind farms without increasing the environmental risk.
6.	Energy Law – draft amendment – UC84	National	Planned, work on the act is ongoing	Positive	The development of grid projects is needed to speed up permitting.
7.	Renewable Energy Sources Act – draft amendment implementing REDIII – UC118	National	Planned	Urgent	Shortening the permitting process to two years across the whole country is more important than designating RAAs.
8.	The deregulation act with tacit consent for environmental processes – UDER95	National	Planned, work on the Act is ongoing	This is causing concerns	If it weren't for the quick reaction of organisations and associations, a very harmful law would have been introduced. There is a risk that the proposal will return in a different form.
9.	Guidelines on avifauna	National – this is not a legal document.	Planned, in progress	Needed, requires attention	The content of the draft guidelines on the impact of wind farms should take into account a broader dialogue with the renewable energy sector.
10.	Proposal to amend the RED Directive	EU	Proposal to amend the directive, start of work at the European level	Positive	The creation of a digital portal to handle all procedures and ensure that the benefits of renewable energy projects are shared across society has the potential to significantly speed up the permitting process.
11.	Environmental Omnibus	EU	Proposal for a new regulation, start of work at the European level	Positive, but raises concerns	The lack of an RIA and the risk of regulatory chaos and increased environmental risks are causing concerns.

