Civil society participation in a robust process of preparing an energy and climate strategy for Poland cannot be reduced to filling out an online form: a call to the Ministry of Climate and Environment to create a space for constructive dialogue around the update of the NECP

In view of the accelerating decarbonisation of the economy and the need for Poland to adapt to the challenges of the next decades, updating the National Energy and Climate Plan (NECP) is a key process not only for shaping Poland's climate policy but also affects the development of all sectors of the economy.

The updated NECP should be consistent with the most up-to-date decisions on EU-wide climate and energy targets (including adopted legislation on emission reductions and negotiated new provisions of the Renewable Energy and Energy Efficiency Directives). This will allow the development of solutions that will be adequate in scope, scale and pace of changes necessary to implement the transformation of the Polish energy sector and economy on time.

In this context, a number of NGOs took part in the discussion of the NECP update process, preparing comments on the transition both at the level of individual sectors and on cross-cutting challenges, with an indication of potential solutions. The comments submitted by civil society went beyond the topics explicitly stated in the form, covering areas such as the timeline for phase-out of the coal in the energy sector and fossil fuel subsidies, the role of local governments in a climate-neutral economy, or the need to synergize climate and energy policy with social and housing policy.

The diversity and multidimensionality of perspectives presented by NGOs correspond to the complex nature of the transition, which requires taking into account both the specifics of individual sectors and broader socio-economic processes.

The pre-consultations are a step in the right direction vis-à-vis the current mode of work on strategic documents in the energy and climate area. At the same time, however, the formula for conducting them does not use the full potential of dialogue with civil society. The online form neither contains clearly defined strategic dilemmas that can be addressed nor does it provide sufficient space for comments beyond the defined catalog of main areas. An additional complication is the very short comment collection period (less than three weeks).

In its current form, pre-consultation does not create a solid foundation for further work on updating the NECP, but it can be the first step in a process of broader, constructive dialogue around its shape with diverse groups of stakeholders, experts, and civil society representatives. There is a broad set of methods for conducting such dialogue at all stages of the work, such as consultation meetings, working groups, and a citizens' panel¹.

To address this challenge, we urge the Ministry of Climate and Environment to launch a transparent, open, and structured dialogue around further work on the NECP, including national energy and climate goals as well as identifying priority areas for reform and investment under the Plan.

¹ An example of the summary of more than a dozen methods and techniques of in-depth public consultation can be found here

We emphasise the readiness to engage in the process of developing a new strategy to meet the climate and energy challenges facing Poland.

Signatories:

- 1. Instrat Foundation (Fundacja Instrat)
- 2. Institute for Sustainable Development Foundation (Instytut na rzecz Ekorozwoju)
- 3. Reform Institute (Fundacja Instytut Reform)
- 4. Green Economy Institute (Fundacja Instytut Zielonej Gospodarki)
- 5. Working group for a socially fair climate and energy policy at Working Community of Associations of Social Organisations (WRZOS), coordinated by Habitat For Humanity Poland
- 6. Polish Green Network (Polska Zielona Sieć)













