

REPUBLIC OF POLAND

THE REPORT
ON THE NATIONAL SYSTEM FOR REPORTING ON
POLICIES AND MEASURES TO REDUCE
GREENHOUSE GAS EMISSIONS AND PROJECTIONS
OF THE EMISSIONS OF THESE GASES AS REQUIRED
PURSUANT TO ARTICLE 39 AND POINT (a) OF
ANNEX VI TO REGULATION (EU) 2018/1999

MARCH 2021

Introduction

The report describes the national system for reporting on policies and measures to reduce greenhouse gases and projections of the emissions and removals of greenhouse gases.

The document has been prepared pursuant to Article 39 and point (a) of Annex VI to Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council.

The Report has been prepared pursuant to Article 36 of Commission Implementing Regulation (EU) (UE) 2020/1208 of 7 August 2020 on structure, format, submission processes and review of information reported by Member States pursuant to Regulation (EU) 2018/1999 of the European Parliament and of the Council and repealing Commission Implementing Regulation (EU) No 749/2014 (OJ L 278 of 26.8.2020) and in format laid down in Annex XXIII to that Regulation.

1. Name and contact information for the entities with overall responsibility for the National Systems for policies and measures and projections
--

The Minister of Climate and Environment is responsible for the implementation of climate change mitigation policy in Poland. Therefore, he is also responsible for the national system for reporting on climate change mitigation policies and measures and projections of greenhouse gas emissions and removals.

Table 1. Basic information on the entity responsible for the national system.

Name of the entity	Contact information	Roles and responsibilities
Minister of Climate and Environment	Wawelska 52/54 00-922 Warsaw Poland Tel.: (+48 22) 36-92-900 E-mail: info@klimat.gov.pl	<ul style="list-style-type: none">• He is responsible for the functioning of the national system.• He supervises the fulfilment of tasks by other entities to which responsibilities have been assigned as part of the system.• He provides necessary information on the energy, waste and forestry sectors.

2. Institutional arrangements in place for preparation of reports on policies and measures and of projections as well as for reporting on them, including an organogram

The Minister of Climate and Environment is responsible for the preparation of reports on climate change mitigation policies and measures and projections of greenhouse gas emissions. In turn, the preparation of drafts of these reports, pursuant to the Act of 17 July 2009 on the System to Manage the Emissions of Greenhouse Gases and Other Substances (Official Journal of the Laws of 2020, Item 1077), is the task of the National Centre for Emissions Management operating in the Institute of Environmental Protection – National Research Institute (hereinafter referred to as KOBIZE). The responsibilities of KOBIZE in this scope include:

- preparation of draft reports on climate change mitigation policies and measures and their submission to the Minister of Climate and Environment 60 days before the deadlines under the provisions of European Union law,
- preparation of projections of greenhouse gas emissions and removals and their submission to the Minister of Climate and Environment 60 days before the deadline.

Given the fact that climate policy is implemented in many sectors of the economy, the competent Ministers responsible for the particular sectors of the economy affecting greenhouse gas emissions are involved in the preparation of reports on climate change mitigation policies and measures and projections of greenhouse gas emissions and removals. They provide the necessary information within their competence and include, respectively:

- the Minister of Climate and Environment – responsible for climate and energy policies, waste management and forestry,
- the Minister of Infrastructure – responsible for the transport sector, maritime economy, inland navigation and water management,
- the Minister of Agriculture and Rural Development – responsible for the implementation of the Government's policy on agriculture and rural development,
- the Minister of Economic Development, Labour and Technology – responsible for the implementation of the strategy for the socio-economic development of the country, innovativeness of the economy, the industry sector and the municipal and household sector in the scope of construction and housing,
- the Minister of State Assets – responsible for the issues related to mining and the extraction of coal and other energy raw materials,
- the Minister of Finance, Development Funds and Regional Policy – responsible for the implementation of economic and national development strategies and the spending of resources from EU Funds.

As a rule, the Ministers listed above cooperate with the institutes and other units subordinated to them to prepare and acquire relevant data on the economic sector within their competence.

In addition, information and data are also provided by other institutions, such as e.g.:

- the National Fund for Environmental Protection and Water Management which implements a number of programmes contributing to greenhouse gas emissions reductions,
- the State Forests National Forest Holding which carries out carbon sequestration activities in the context of land use, land-use change and forestry (LULUCF),
- the Central Statistical Office and the Energy Regulatory Office which provide important statistical data.

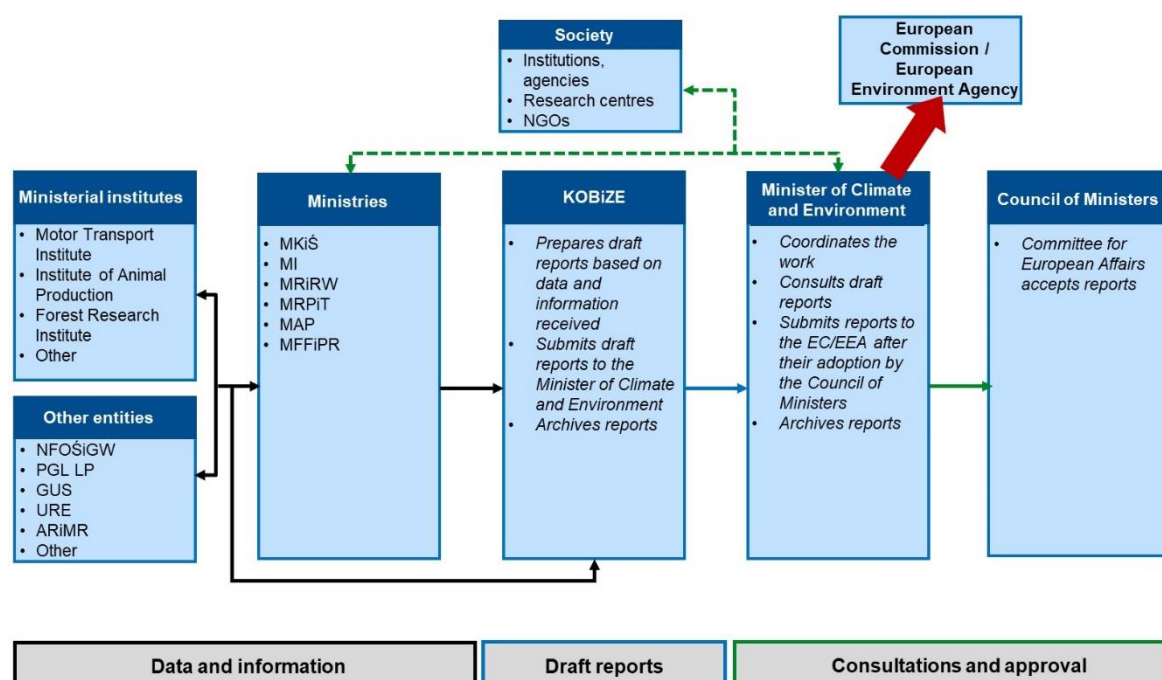
Table 2 . List of institutions involved in the preparation of reports on climate change mitigation policies and measures and projections of greenhouse gas emissions and removals.

	Name of the institutions	Roles and responsibilities
1	The Minister of Climate and Environment (MKiŚ)	<ul style="list-style-type: none"> • He coordinates the work on the reports. • He consults draft reports with other Ministers. • He submits draft reports for consideration to the Council of Ministers. • He is responsible for the submission of the reports to the European Commission. • He cooperates with KOBiZE in the scope of acquiring for the purposes of the report on policies and measures the necessary information on policies and measures in the energy, waste and forestry sectors and on the EU ETS system and the achievement of the greenhouse emission reduction targets in the non-ETS sectors. • He cooperates with KOBiZE in the scope of acquiring data for activity projections in the energy, waste and forestry sectors and forest land use. • He is responsible for archiving of the reports.
2	The National Centre for Emissions Management in the Institute of Environmental Protection – National Research Institute (KOBiZE)	<ul style="list-style-type: none"> • It prepares draft reports and submits them to the Minister of Climate and Environment. • It cooperates with the Ministers responsible for the implementation of sectoral climate change mitigation policies to acquire up-to-date information on planned and implemented policies and measures. • It cooperates with other institutions in possession of information and data necessary for the preparation of the reports. • In cooperation with the competent Ministers, it prepares data on projections of activities used to estimate emission projections (the first data in this scope are to be prepared in December 2021). • It prepares projections of greenhouse gas emissions. • It uploads the final reports into the Reportnet system. • It is responsible for archiving of the reports.
3	The Minister of Infrastructure (MI)	<ul style="list-style-type: none"> • He cooperates with KOBiZE in the scope of acquiring for the purposes of the report on policies and measures the necessary information on policies and measures in the transport sector and the waste sector (water and wastewater management). • He cooperates with KOBiZE in the scope of acquiring data for activity projections in the transport sector and water and wastewater management.
4	The Minister of Agriculture and Rural Development (MRWiR)	<ul style="list-style-type: none"> • He cooperates with KOBiZE in the scope of acquiring for the purposes of the report on policies and measures the necessary information on policies and measures in the agriculture sector and supports it in

	Name of the institutions	Roles and responsibilities
		<p>the development of methods for estimating the reduction of greenhouse gas emissions in this sector.</p> <ul style="list-style-type: none"> • He cooperates with KOBiZE in the scope of acquiring data for activity projections in the agriculture sector and farmland use.
5	The Minister of Economic Development, Labour and Technology (MRPiT)	<ul style="list-style-type: none"> • He cooperates with KOBiZE in the scope of acquiring for the purposes of the report on policies and measures the necessary information on policies and measures in the industrial processes sector and the municipal and household sector. • He cooperates with KOBiZE in the scope of acquiring data for activity projections in the industrial processes sector.
6	The Minister of State Assets (MAP)	<ul style="list-style-type: none"> • He cooperates with KOBiZE in the scope of acquiring for the purposes of the report on policies and measures the necessary information on policies and measures in the energy sector. • He cooperates with KOBiZE in the scope of acquiring data for activity projections in the energy sector.
7	The Minister of Finance, Development Funds and Regional Policy (MFFiPR)	<ul style="list-style-type: none"> • He cooperates with KOBiZE in the scope of acquiring for the purposes of the report on policies and measures the necessary information on the implementation of EU programmes, such as e.g. the Operational Programme Infrastructure and Environment.
8	The National Fund for Environmental Protection and Water Management (NFOŚiGW)	<ul style="list-style-type: none"> • It cooperates with KOBiZE in the scope of determining the effects of greenhouse gas emission reductions resulting from the implementation of programmes carried out by the NFOŚiGW.
9	The State Forests National Forest Holding (PGL LP)	<ul style="list-style-type: none"> • It cooperates with KOBiZE in the scope of acquiring information on the implementation of policies and measures in the land use, land-use change and forestry sector. • It initiates and coordinates the preparation of forest management plans within the framework of which periodic assessments of the condition of forests and forest resources are carried out and changes in forest ecosystems are projected. • It prepares periodic large-area inventories of the condition of forests and updates the status of forest resources. • It operates a databank on forest resources and the condition of forests.
10	Central Statistical Office (GUS)	<ul style="list-style-type: none"> • The source of most statistical data necessary for the performance of annual national emission inventories. • A source of population projection data.
11	Energy Regulatory Office (URE)	<ul style="list-style-type: none"> • A source of data on the energy sector, including the data on the mechanisms for support to RES and high-efficiency CHP as well as energy efficiency improvements.

	Name of the institutions	Roles and responsibilities
12	Agency for Restructuring and Modernisation of Agriculture (ARiMR)	<ul style="list-style-type: none"> A source of data on the agriculture sector, including the data on the programmes implemented under agricultural policies.
13	Council of Ministers (Committee for European Affairs)	<ul style="list-style-type: none"> It approves the structure of the national system and the tasks, roles and responsibilities of the particular entities / institutions. It accepts the report on the national system before its submission to the EC.

Fig. 1. Structure of the national system for reporting on climate change mitigation policies and measures and projections of greenhouse gas emissions and removals.



3. Legal arrangements in place for preparation of reports on policies and measures and of projections

The fundamental legal document regulating the issues related to the fulfilment of obligations, monitoring, reporting, archiving of information and evaluation of progress in achieving the reduction targets is the Act of 17 July 2009 on the System to Manage the Emissions of Greenhouse Gases and Other Substances (Official Journal of the Laws of 2020, Item 1077), which specifies, among others, the tasks of the National Centre for Emissions Management, the operating rules of the national system for emissions management and projections, the rules of the management of the emissions of greenhouse gases and other substances, the operating rules of the National Registry of the Kyoto Units, the rules of trading and management of the Kyoto units, the operating rules of the National Green Investment Scheme and the climate account.

The reporting system is complemented with the Act of 12 June 2015 on the System for Greenhouse Gas Emission Allowance Trading (Official Journal of the Laws of 2020, Item 136), which has

implemented into the Polish law Directive 2003/87/EC, along with its successive amendments, introducing regulations necessary to ensure the correct functioning of this system in Poland.

The Act of 17 July 2009 on the System to Manage the Emissions of Greenhouse Gases and Other Substances created the legal basis for monitoring the implementation of policies and measures to reduce greenhouse emissions. KOBiZE plays an important role in this process as it has been entrusted with the performance of tasks to:

- monitor the measures of climate policy and prepare analyses, reviews and evaluations of its functioning,
- project the effects of the implementation of climate policy,
- develop tools to support the achievement of the objectives of the system for emissions management and tools for modelling the economic, financial and social effects of the implementation of climate policy,
- integrate environmental reporting systems,
- prepare reports on, and projections of, emission levels.

The Central Statistical Office (GUS) is another entity which plays an important role in the implementation of tasks related to reporting on greenhouse gas emissions. It carries out surveys and makes their results available within the framework of public statistics. The statistics uses aggregated data on the emissions of greenhouse gases and other air pollutants, statistical data on energy, fuel production and use, as well as many other statistics relating to the implementation of the Climate Convention and data on the production, imports and exports of substances that deplete the ozone layer.

The Act of 17 July 2009 on the System to Manage the Emissions of Greenhouse Gases and Other Substances also directly regulates the issues related to the preparation of reports on climate change mitigation policies and measures and of projections of greenhouse gas emissions, assigning the following tasks to KOBiZE:

- The preparation of draft reports on climate change mitigation policies and measures and their submission to the Minister of Climate and Environment 60 days before the deadlines under the provisions of European Union law (Article 11b).

In preparing these draft reports, KOBiZE can use, among others, information, data and analyses provided by public administration authorities, information and data held in the national database and other information and data provided by economic self-government organisations, employers' organisations and the Funds for Environmental Protection and Water Management. The information, data and analyses include short- and long-term macroeconomic projections, national and sectoral economic policies and strategies, as well as information, among others, on the measures taken to limit or reduce emissions or types of legal, economic and administrative instruments used to support emission reductions. On request from KOBiZE, public administration authorities provide data, information or analyses necessary for the preparation of draft reports. KOBiZE can also ask economic self-government organisations, employers' organisations or the Funds for Environmental Protection and Water Management to make available data, information or analyses necessary for the preparation of draft reports.

- The preparation of projections of greenhouse gas emissions and removals and their submission to the Minister of Climate and Environment 60 days before the deadline (Article 12).

The projections cover a period of 20 years and are updated after 5 years elapse. In preparing emission projections, account is taken, among others, of short- and long-term macroeconomic

projections, national and sectoral economic policies and strategies, activity projections, as well as information on the measures taken to limit or reduce emissions.

- The preparation of projections of changes in activity levels for sectors of the economy, in cooperation with the competent Ministers (Article 9).

Activity projections are prepared every 5 years, starting from December 2021, apply to the calendar years ending in the digit 0 or the digit 5 and cover a period of 25 years, starting from the reference year (i.e. the year ending in the digit 0 or the digit 5 or another one – in justified cases). In addition, activity projections are updated if, after the preparation of projections, there are changes in the factors analysed and the parameters projected, as a result of which the quantities projected change by more than 20% relative to those included in the last projection. Updates are not carried out if less than a period of 18 months remains until the subsequent projection or if the changes will not have a significant effect on the emission levels.

4. Procedural and administrative arrangements and timescales in place for the preparation of reports on policies and measures and of projections, to ensure the timeliness, transparency, accuracy, consistency, comparability and completeness of the information reported
--

As indicated in Sections 2 and 3 of this report, KOBiZE is obliged to meet the deadlines set by statute for the preparation and submission of a draft report on climate change mitigation policies and measures and of projections of greenhouse gas emissions to the Minister of Climate and Environment. The deadline is defined as 60 days before the deadline for the submission of the PaMs report and emission projections to the European Commission, which is specified in EU regulations, i.e. now in Article 18 of the Governance Regulation (EU) 2018/1999.

The PaMs report is prepared pursuant to the provisions of Article 11b of the Act of 17 July 2009 on the System to Manage the Emissions of Greenhouse Gases and Other Substances. The draft PaMs report is prepared by KOBiZE using the information and data held in the database established at KOBiZE and its own studies to evaluate policies and measures. In preparing the draft report, use is also made of information and data acquired on request both from the competent Ministers who are responsible for the implementation of policies and measures in the particular sectors of the economy (those indicated in Section 2 of this report) and from institutions making up the systems for the financing of environmental protection in Poland (e.g. the NFOŚiGW) or those responsible for the implementation of support schemes (e.g. the URE in the scope of support for the development of RES and cogeneration).

The projections of greenhouse gas emissions and removals are prepared pursuant to Article 12 of the Act of 17 July 2009 on the System to Manage the Emissions of Greenhouse Gases and Other Substances. The projections are prepared by the team which prepares annual greenhouse gas inventories using an analogous methodology, thus ensuring both consistency between the reported and projected greenhouse gas emissions and removals and the coverage of all the sources and sinks. The input data used in greenhouse gas projections are used, at the same time, in the projections prepared for the purposes of Directive (EU) 2016/2284 which are prepared by the same expert team. The projections take into account policies and measures to the extent to which they are reflected in strategic and planning documents and the assumptions prepared by Ministries.

After draft reports are accepted by the Minister of Climate and Environment, they are subjected to consultations with Ministries, institutions, agencies, research centres and nongovernmental organisations, among others: the Ministry of Infrastructure, the Ministry of Agriculture and Rural Development, the Ministry of Economic Development, Labour and Technology, the Ministry of State

Assets, the National Fund for Environmental Protection and Water Management, the Central Statistical Office, ministerial institutes and the Polish Ecological Club. The aim of the consultation mechanism which has been established is to examine the quality, consistency and completeness of data and information presented in the reports.

Moreover, KOBiZE is the main unit supporting the Minister of Climate and Environment in the monitoring of climate policy and the preparation of greenhouse emission projections. The assignment of these tasks, along with the performance of national inventories of greenhouse gases and air pollutants, projections of pollutant emissions pursuant to Directive (EU) 2016/2284 and draft national communications and biennial reports, as well as reports to the EU pursuant to Regulation (EU) 2018/1999, to one unit has contributed to integrating the environmental reporting system related to climate change and air protection policy, thus ensuring the adequate quality of information submitted to the national, EU and international centres in terms of accuracy, consistency, comparability and completeness.

As another element of the control of the transparency, accuracy, consistency, comparability and completeness of the information submitted in the scope of projections of greenhouse gas emissions and removals and policies and measures, they are subjected to an independent assessment by external experts. An assessment of this type is carried out cyclically during a review of national communications and biennial reports. The comments and recommendations made by an international expert review team designated by the UNFCCC Secretariat are taken into account in the process of preparing subsequent reports both to the UNFCCC and to the EU, given that consistent information and data in the scope of policies and measures and emission projections are reported.

5. Description of the information collection process

Information on the implemented, adopted and planned policies and measures is acquired from the particular Ministers within their competence. In addition, KOBiZE collects the information acquired in a dedicated database which is periodically updated. The data on the effects of policies and measures, including both ex-post and ex-ante effects, are acquired from the following sources:

- the national, regional and sectoral plans, programmes and strategies,
- the provisions of law regulating policies and measures or introducing obligations and standards affecting the projected emissions,
- analyses carried out by the particular Ministries,
- documents on the implementation of projects and programmes supported by different institutions and Ministries, among others: the National Fund for Environmental Protection and Water Management, the Ministry of Agriculture and Rural Development, the Ministry of Infrastructure and the Ministry of Economic Development, Labour and Technology,
- the own analyses of KOBiZE carried out using, among others:
 - data from inventories of greenhouse gas emissions,
 - data available in different official databases and registers (e.g. the GUS and URE databases, the Central Register of Vehicles and Drivers, the Central Register of the Energy Performance of Buildings, the Central Register of Building Emissions and the National Database on the Emissions of Greenhouse Gases and Other Substances),
 - information in the Government's documents on the evaluation of the implementation of policies and objectives,

- the assumptions laid down in the Government's documents of a planning and strategic character.

The work to acquire and gather up-to-date information and data on policies and measures is carried out in the 3rd and 4th quarter of the year preceding the year when the report is submitted to the EC.

The sources of input data to emission projections include primarily official activity projections, particular for the energy sector, as well as information on the output of industrial goods, the quantity of waste generated etc. by years and categories of emission sources used in the national greenhouse gas inventory as provided to the Ministry of Climate and Environment by the competent public administration authorities.

The future greenhouse gas emissions in the energy sector are determined on the basis of the assumptions for Poland's energy policy developed periodically by the Ministry responsible for energy, including the national energy balance, for both stationary and mobile sources. Additional analyses of road transport are also carried out by the Motor Transport Institute (ITS) on commission from the Ministry responsible for transport. The input data to the projections of emissions from the sector of industrial processes come from the Ministry responsible for the economy, but also from projections prepared by sectoral associations (e.g. the production of lime and cement). In turn, detailed data on the expected pace of activity changes in the agriculture sector are provided by the Ministry of Agriculture and Rural Development. The data on activities which provide the basis for estimating the greenhouse gas emissions in the waste sector mainly come from the projections contained in the National Waste Management Plan. The data on the projected population of the country, related to wastewater management, come from the surveys of the Central Statistical Office.

The national projections of greenhouse emissions take into account the effects of adopted and implemented policies and measures to reduce these emissions and to enhance their removal. These projections constitute the so-called scenario "with measures", including the effects of the policies which are already implemented. In turn, the scenario "with additional measures" takes into account the policies and measures which are planned to be implemented.

In addition, starting from December 2021, activity projections will be prepared by KOBiZE in cooperation with the competent Ministers. This is expected to ensure better availability and quality of data (more information on this issue is given in Section 9 of this Report).

6. Description of the alignment with the national inventory system

In principle, projections of greenhouse gas emissions are prepared using the same methodology as that of annual emissions inventories by the same expert team. This ensures consistency between both data series despite the fact that in certain categories the projected activities used in emission projections can be aggregated at a higher level than that of the national inventory. Any methodological changes and recalculations of historical emissions are also taken into account in successive emission projections.

7. Description of the links to arrangements on integrated national energy and climate reports pursuant to Art. 17 of Regulation (EU) 2018/1999

The work on the first National Energy and Climate Plan (NECP) involved inter-institutional cooperation and exchange of information in the scope of input data to greenhouse gas emission projections in the

process to prepare the NECP and emission projections pursuant to the MMR Regulation (EU) No 525/2013. Such an approach will be maintained in subsequent years, in particular, for the purposes of preparing and acquiring data for activity projections necessary for estimating emission projections.

The first integrated report pursuant to Article 17 of Regulation (EU) 2018/1999 is to be submitted to the EC by 15 March 2023. So far it has not been decided in detail how the process of its development will unfold and who will prepare reports on progress in the implementation of the NECP. It is assumed that in accordance with the requirements set in Article 17(3), for the purposes of these reports, use will be made of data from greenhouse gas inventories (Article 26(3) of Regulation (EU) 2018/1999) and information on climate change mitigation policies and measures and greenhouse gas emissions projections contained in reports prepared pursuant to Article 18 of Regulation (EU) 2018/1999. This means that consistency will be maintained between the data and information contained in integrated reports and reporting pursuant to Article 18.

A detailed process to prepare integrated reports pursuant to Article 17 of Regulation (EU) 2018/1999 and to link it at the national level with the reporting process pursuant to Article 18 of Regulation (EU) 2018/1999 will be specified well in advance, before work begins on the first integrated report pursuant to Article 17 and after the EC issues implementing acts defining the scope and format of these reports, thus enabling the assignment of detailed tasks to the particular institutions which will take part in the work to prepare them. It should be pointed out that the Minister of Climate and Environment will be responsible for the work on both reports. This will ensure consistency between both processes, including that of the information reported.

8. Description of the quality assurance and quality control activities for reporting of policies and measures and projections

Extensive activities are undertaken in the area of the quality assurance and control of projection documents. They include the assignment to one institution of tasks to inventory and project greenhouse gas emissions and to evaluate the effects of policies and measures. This contributes to achieving a uniform methodological approach and consistency between documents and to fulfilling the required scope of reporting obligations. Another element ensuring the collection of data with adequate quality is the adoption of the assumption that the source of input data to projections and evaluations of effects are primarily official data on activity levels and official information provided by Ministries, governmental organisations and institutes or those available in governmental documents and official databases and registers.

KOBiZE has prepared for many years the reports on climate change mitigation policies and measures and projections of greenhouse gas emissions. As a result, it has developed a number of activities and processes to support quality assurance and control.

In the scope of policies and measures:

- the use of official data and information,
- the internal verification of the quality of the performed analyses of policies and measures, especially including the estimates of their effects,
- the determination of the assumptions adopted during the analysis to evaluate the effects of policies and measures and an indication of the limitations of the methodology applied,
- consultation on the assumptions adopted and the results achieved with Ministries, governmental organisations and research centres.

In the scope of emission projections, the quality control of the projections made is carried out in the internal verification process consisting in multi-stage checking of estimated emissions and their aggregates. In turn, the quality assurance is exercised in consultations with Ministries, governmental organisations, research centres and nongovernmental organisations. After consideration the submitted comments and proposals of changes are taken into account in the final version of the projection.

Moreover, as an institution which prepares emission projections, KOBiZE also receives for consultation draft governmental plans, programmes and strategies which – after their adoption – provide the basis for preparing emission projections. This ensures an effective exchange of information and makes it possible to maintain the consistency of the documents created.

In addition:

- after draft reports are accepted by the Minister of Climate and Environment, they are subjected to consultations with Ministries, institutions, agencies, research centres and nongovernmental organisations, among others: the Ministry of Infrastructure, the Ministry of Agriculture and Rural Development, the Ministry of Economic Development, Labour and Technology, the Ministry of State Assets, the National Fund for Environmental Protection and Water Management, the Central Statistical Office, ministerial institutes and the Polish Ecological Club. The aim of the consultation mechanism which has been established is to examine the quality, consistency and completeness of data and information presented in the reports,
- before the final agreed reports are submitted to the European Commission, they are adopted by the Council of Ministers.

9. Description of the process for selecting assumptions, methodologies and models for making projections of anthropogenic greenhouse gas emissions

The main assumptions for making emission projections are laid down in strategic documents at the national level, i.e. the national, regional and sectoral economic policies and strategies. At present, the fundamental document is the National Energy and Climate Plan.

The projection provides for the implementation of the most important directions of Poland's energy policy, taking into account the requirements of the European Union in the scope of energy efficiency improvement, enhancement of the security of fuel and energy supplies, diversification of the electricity production mix, the development of the use of renewable energy sources, including biofuels, the development of competitive fuel and energy markets and the limitation of the impacts of the energy sector on the environment.

The sources of input data to emission projections are primarily official activity projections and information on the output of industrial goods, the agricultural output and the quantity of waste generated provided to the Ministry of Climate and Environment by the competent Ministries. The assessment of the future emissions uses data on the projected pace of activity changes in the sector as acquired from expert analyses and projections carried out on commission from other Ministries. It also uses the results of projections made by sectoral associations. In the absence of relevant projections, the activity data for a part of activity types are determined at the level of averaged long-term data in order to fully cover all the source categories considered in the emission inventory.

In this context, it should be pointed out that a new task has been assigned to KOBiZE. It is the preparation of activity change projections. It is to be carried out in cooperation with the competent Ministers who are obliged to cooperate with KOBiZE in the scope of developing assumptions and to forward the necessary data and information in their possession. Activity change projections will be prepared every 5 years (the first data developed by KOBiZE will be available in December 2021) and apply to the calendar years ending in the digit 0 or the digit 5 and cover a period of 25 years, starting from the reference year (i.e. the year ending in the digit 0 or the digit 5 or another one – in justified cases). The data developed in this way will provide the basis for the preparation of projections of greenhouse gas emissions starting from 2023.

Activity projections will be additionally updated if after a projection is made there are changes in the factors analysed and the parameters projected, as a result of which the projected levels will change by more than 20% relative to those included in the last projection. However, no update will be performed if a period of less than 18 months remains until the preparation of the next projection or if the changes have no significant effect on the emission levels.

The methodology for estimating the projected greenhouse gas emissions and removals for all the sectors is the same as that applied to prepare greenhouse gas inventories. In the absence of projection data necessary to update emission factors, averaged long-term data will be used, just as in the case of activities.

An additional source on the effects of policies and measures are environmental funds financing projects to reduce emissions. Information is also acquired from programmes and projects to reduce greenhouse gas emissions. The extent of the emission reduction achieved is calculated from energy savings attained or enhanced use of energy from renewable sources, using the methodology applied to inventory greenhouse gas emissions.

10. Description of procedures for the official consideration and approval of the Member States national system for policies and measures and projections

The national system for climate change mitigation policies and measures and projections of greenhouse gas emissions is adopted by the Council of Ministers (the Committee for European Affairs) after a previous process of consultations with Ministries.

11. Information on relevant institutional, administrative and procedural arrangements for domestic implementation of the EU's nationally determined contribution, or changes to such arrangements

The Minister of Climate and Environment is responsible for the implementation of climate change mitigation policy in Poland. His tasks include the preparation and coordination of draft legal acts and national strategies, the monitoring of the activities of government administration authorities and inter-institutional working teams for climate policy, the presentation of the required reports on climate issues and the exercise of supervision over the functioning of the EU emission allowance trading system in Poland.

In order to implement climate policy, including the fulfilment of obligations under EU law and the Climate Convention (UNFCCC), the Minister of Climate and Environment cooperates with other Ministers who are responsible for the implementation of the sustainable development strategy, the

national environmental policy and climate policy into sectoral policies (more information on their competence is given in Section 2 of this report).

The fundamental legal document regulating in Poland the issues related to the fulfilment of obligations, monitoring, reporting, archiving of information and evaluation of progress in achieving the greenhouse gas emission reduction targets is the Act of 17 July 2009 on the System to Manage the Emissions of Greenhouse Gases and Other Substances. This Act provided the legal basis for the process of monitoring the policies and measures to reduce greenhouse gas emissions and of preparing emissions inventories and projections. The National Centre for Emissions Management in the Institute of Environmental Protection (KOBIZE) plays a leading role in this process (more information in this scope is given in Sections 2 and 3 of this report).

In accordance with the Paris Agreement, all its Parties are obliged to regularly prepare, communicate and maintain nationally determined contributions to the Paris Agreement (NDCs) and are also obliged to take domestic measures to reduce emissions in order to implement these contributions. Poland has acceded to the Paris Agreement as a Member State of the EU and, therefore, it does not submit its individual NDC to the UNFCCC. Such a contribution was submitted by the Member States jointly as the EU to the Convention Secretariat in March 2015 and updated in the notification submitted in December 2020. The achievement of the NDC reduction target will consist of the efforts of the particular Member States. The EU target which was originally declared in its NDC provided for GHG emission reductions at a level of at least 40% by 2030 compared with 1990. In accordance with the decision of the European Council of 2020, the EU updated its target as declared in the NDC to at least 55% by 2030 compared with 1990, immediately submitting a relevant notification to the UNFCCC Secretariat.

Moreover, in the context of the implementation of their NDCs, each Party to the Paris Agreement is obliged to submit its first biennial report called the Biennial Transparency Report (BTR) to the UNFCCC Secretariat by the end of 2024 where, among others, it should describe the national system for monitoring progress in the implementation of the nationally determined contribution (NDC). At present, work is underway at the UNFCCC to determine the format and scope of information which the Parties should report in this scope.

The aim of the national system for reporting on climate change mitigation policies and measures and projections of greenhouse gas emissions as described in this report is, among others, to enable the tracking of progress in the implementation of reduction targets. In light of this, the processes, roles and competences of the particular entities and institutions functioning within this system are the same as their functions for the purposes of monitoring Poland's contribution to the implementation of the EU NDC. They were defined and described in Sections 1, 2, 3, 4 and 5 of this Report.

12. Description of the stakeholder engagement undertaken in relation to the preparation of policies and measures and projections

After the Minister of Climate and Environment approves draft reports on climate change mitigation policies and measures and emission projections they are subjected to inter-ministerial consultations during which the particular Ministers can submit their comments. Moreover, they are made available to institutions, agencies, research centres and nongovernmental organisations which can also submit their comments before the reports are approved by the Council of Ministers. The aim of such a consultation mechanism is to ensure the quality, consistency and completeness of the data and information presented in the reports.

Moreover, each draft legal act or draft document of a planning and strategic character, such as a national and sectoral development strategies, plans and programmes in the area of climate change mitigation (just as in any other area) are subjected to public consultations.

The present Work Regulations of the Council of Ministers divide public consultations into two separate processes:

- within the framework of public consultations a draft is presented to nongovernmental organisations or stakeholders or other interested entities or institutions whose opinion is desirable in light of the content of the document being drafted,
- in the process of gathering opinions on it, a draft is forwarded to specific entities where such an obligation results from separate regulations or is related to the activities of these entities.

The consultations are an indispensable tool for carrying out a reliable and comprehensive impact assessment. The broadly conceived consultations should be conducted by the administration at each stage of the decision-making process or the work on the solution being proposed. The consultations should begin at as early a stage of the work as possible, in particular, at the conceptual stage (for Acts, at the stage where the assumptions are developed).

The consultation process is multilateral and complex. In the course of it, different entities which are the addressees of the proposed solution are able to become acquainted with the proposed solutions and to express their own comments and suggestions concerning the final shape of the proposed solutions.

The concept of public consultations only applies to the work on draft governmental documents (Acts, Regulations, the assumptions for Acts, strategies, programmes and the Government's positions on the draft Acts submitted by Members of Parliament). A draft Act can be subjected to public consultations after it is entered into the list of legislative work of the Council of Ministers. The organiser of public consultations is obliged to comply with the formal requirements set out in the Work Regulations of the Council of Ministers and the basic rules for conducting consultations.

The document called "The guidance for performing an impact assessment and public consultations within the framework of the legislative process", adopted in 2013 by the Council of Ministers, specifies how the so-called impact assessment and consultations on draft legal acts should be carried out correctly. The aim of the Guidance is, among others, to ensure that the emerging law is consulted to a sufficient extent with the entities which it will affect. The correctly conducted consultations contribute to preparing solutions which are adequate to the expectations of the public.

Consultations are necessary at each stage of the work on a given legal regulation. The involvement of stakeholders and interested institutions in the consultation process and the seeking of their opinions on draft legal acts help work out the best legislative proposal. The opinions and proposals submitted are not binding for the Government. The Council of Ministers takes the final legislative decision and bears the consequences of it.

Taking into account the content of the draft and also giving consideration to other circumstances, including as well the importance of the draft and its expected socio-economic effects, the degree of its complexity and its urgency, the proposing authority (as a rule, the Minister responsible for preparing a given draft) subjects the draft to public consultations, including its forwarding to nongovernmental organisations or other interested entities or institutions to know their positions. It is mandatory to subject a draft to public consultations, i.e. to disclose it to the public, whereas it is up to the entities to decide whether the document is directly handed out to the interested entities. In the latter case, a position needs to be taken on the comments received and the draft should be handed over after

changes have been made. A consensus conference can be held for all the entities which have submitted their comments or they can be invited to such a meeting which is organised for other entities. As a rule, the deadline for taking a position (for presenting comments on a draft) in public consultations is 21 days. In certain cases, it can be reduced to 7 or 14 days, which requires justification.

Moreover, on the principles and in the procedure laid down in the Act of 3 October 2008 on the Provision of Information on the Environment and Its Protection, Public Participation in Environmental Protection and Environmental Impact Assessment (Official Journal of the Laws of 2020, Items 283, 284, 322, 471 and 1378), public participation is ensured in the process of preparing plans, programmes or strategies.

Draft legal acts and other draft documents in the area of climate change mitigation are, as a rule, consulted with different institutions, agencies, research centres, sectoral chambers and associations and nongovernmental organisations, such as e.g. the National Fund for Environmental Protection and Water Management, the Central Statistical Office, the State Forests National Forest Holding, the Institute of Environmental Protection, the Industrial Chemistry Research Institute, the Institute of Meteorology and Water Management, the Motor Transport Institute, the Institute of Animal Production, the Institute of Agricultural and Food Economics, the Institute for Ecology of Industrial Areas, the Institute of Soil Science and Plant Cultivation, the Lewiatan Confederation, the Polish Steel Association, the Polish Cement Association, the Polish Lime Association, the Polish Ecological Club, the Climate Coalition, WWF, ClientEarth, Greenpeace, the Polish Green Network and many others.