

**Poland and the European Green Deal:  
On Track Towards Peaceful Coexistence?**

Lengyelország és az európai zöld megállapodás:  
úton-útfélen a békés együttélés felé?

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**Abstract:** Following the adoption of the European Green Deal, the traditionally reluctant position of the government of Poland regarding climate neutrality is showing ruptures and has become controversial. The aim of this policy brief is to assess the structural and discursive elements shaping the climate and energy policy of the Polish government. The paper uses a mixed methodology of literature review and qualitative content analysis involving official statements issued by three government bodies between 1 September and 31 December, 2021. The study finds that the reluctance of the Polish government is maintained by frames that presume an incompatibility between ambitious climate action and the will of ‘the people’, as well as structures that can be characterised by a state capture of the energy sector and the dominance of pro-coal actors.

**Keywords:** Poland, Central Europe, European Green Deal, climate neutrality, energy

**Absztrakt:** Az Európai Zöld Megállapodás elfogadását követően a lengyel kormány hagyományosan klímasemlegességet elutasító álláspontja feltöredezett és ellentmondásossá vált. A politikai elemzés célja feltérképezni a kormány klíma- és energia-politikáját befolyásoló strukturális és diszkurzív elemeket. Ehhez a tanulmány kevert módszertant alkalmaz, melynek részét képezi a témában releváns szakirodalom áttekintése, illetve három kormányzati szerv 2021. szeptember 1. és december 31. között kiadott hivatalos közleményeinek kvalitatív tartalomelemzése. A tanulmány fő megállapítása, hogy a lengyel kormány vonakodó politikáját egyrészt olyan kommunikációs keretek tartják fent, melyek az ambiciózus klímavédelmet a „nép” akaratával helyezik szembe, másrészt olyan struktúrák, melyek az energiaszektor állami foglyul ejtésével és a széntermelést támogató aktorok dominanciájával jellemezhetők.

**Kulcsszavak:** Lengyelország, Közép-Európa, Európai Zöld Megállapodás, klímasemlegesség, energia

## INTRODUCTION

In the last few years, the European Union (EU) has taken ambitious steps to speed up efforts against climate change. Under the umbrella of the [European Green Deal](#) (EGD), it has passed a number of bills, most notably the [Fit for 55](#) package pledging to reach a 55% emission reduction by 2030, and the [European Climate Law](#) to become the first climate-neutral continent in 2050. Despite the devastating effects of the Covid-19 pandemic on European healthcare, welfare systems, and economies, the EU has made [climate mitigation a key priority](#) in its crisis recovery instrument (NextGenerationEU) and the 2021-2027 long-term budget.

The implementation of the EGD has raised many questions in Poland, a country that is repeatedly regarded as an actor working to water down stringent EU climate policies. The position of the Polish government on climate neutrality has become paradoxical in the last two years, with the possibility of a transformation of the coal regime. This paper examines what structural and discursive factors shaped the stance of the government of Poland in the autumn of 2021 regarding the EGD and climate neutrality. To answer this question, the policy brief analyses the structural and discursive patterns of the Polish coal regime and uses a mixed methodology of literature review and qualitative content analysis. The findings indicate that the existing system is maintained by the centralisation of the energy industry, the blending of state and corporate interest, a lack of strong domestic actors in favour of a low-carbon transition, and the domination of frames based on the juxtaposition of climate action and the well-being of 'the people'. This structural-discursive constellation is solid; however, the EU appears as an external actor that could radically transform the system and push it towards a low-carbon future.

## POLAND'S STANCE ON EUROPEAN CLIMATE AND ENERGY POLICY

In 2020, Poland was the biggest hard coal producer in the EU, accounting for [96%](#) of its total hard coal production. Although domestic hard coal and lignite production has been [steadily decreasing](#) since the system change, it still made up more than two-thirds of Poland's primary energy production in 2020 (Figure 1). According to [Statistics Poland](#), renewable energy sources (RES) have reached a share higher than the [15% target for 2020](#), but biofuels still dominate the figures, which is problematic because most of them are [co-fired with coal in power plants](#). All in all, it can be deduced from these figures that the Polish economy is still heavily reliant on hard coal.

Poland's position regarding the EGD and the Fit for 55 package has been controversial since the beginning of discussions. While the government did not reject the document in 2020, it [did not commit itself](#) to attaining climate neutrality by 2050, either. In 2021, the updated [Energy Policy of Poland until 2040](#) (PEP2040) set new goals to [considerably cut greenhouse gas emissions](#), introduce nuclear power to the energy mix, and extend the production of RES. Later that year, the government signed a deal with the coal mining industry and trade unions to [exit coal by 2049](#), although no detailed roadmap about the phase-out process has been published.

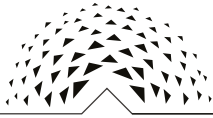
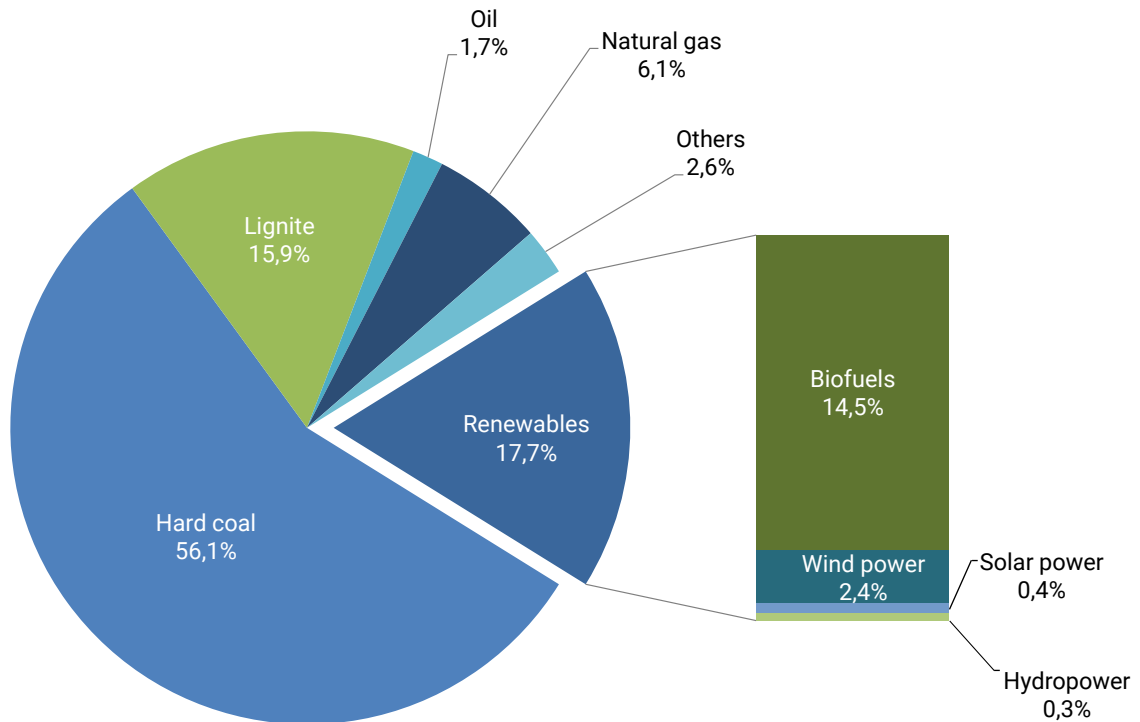


Figure 1.  
The Energy mix of Poland - primary energy production (2020)



The debates between Poland and the EU indicate that the ambitions of the Law and Justice- (PiS-)led government to reach climate neutrality are questionable. Following the decision of the European Commission (EC) in June 2021 to [retain the NextGenerationEU stimulus package from Poland](#) due to concerns about corruption, unequal treatment, rule of law, and the primacy of EU law, the government [threatened the EU](#) with blocking talks on the EGD as long as the fund is not granted. To replace the NextGenerationEU package, the government launched the so-called [Polish Deal](#) development program, which gives little attention to supporting a low-carbon transition. The intentions of the regime to [secure the operation of the Turów lignite coal mine](#) have also caused friction. After the Czech Republic [filed a lawsuit](#) accusing Poland of cross-border pollution, the [Court of Justice of the European Union ordered the PiS-led administration](#) to cease extraction activities, and then the EC imposed a [daily penalty of 500 thousand euros](#) until compliance. The verdict was followed by [protests organised by trade unions](#), and the fines [have not yet been paid](#) by Polish authorities. Another controversial decision was made at the UN Climate Change Conference in Glasgow (COP26), when Minister of Climate and Environment Anna Moskwa [signed the Global Coal to Clean Power Transition Statement](#), pledging to phase out coal in the 2030s but [withdrew her statement on Twitter](#) the same day.

The involvement of PiS in EU institutions does not show signs of thawing, either. Out of the eighteen documents that were decided upon in the European Parliament (EP) in 2021, the PiS Members of the European Parliament (MEPs) voted against seven and abstained six times (Table 1). The decisions the Polish government favoured were not closely connected to the EGD and the Fit for 55 package. The bills it opposed, by contrast, were part of broader strategies such as the [EU Biodiversity Strategy for 2030](#), the [European Strategy for Energy System Integration](#), the [General Union Environment Action Programme to 2030](#), and the motion regarding the [COP26 summit](#).

To conclude, although the government has taken certain steps towards decarbonisation, its position in the EU climate debates has been roughly unchanged. The following sections aim to nuance this picture by first introducing the discursive and structural elements of Poland’s congealed coal regime, then naming the possible ruptures that might lead to change.

Table 1.  
The participation of Polish MEPs in the European Parliament in climate and energy-related topics (1 January – 31 December, 2021)

Date	Name of document*	Type of document	Result	MEPs of Poland**	MEPs of PiS**
19 Jan, 2021	The Bonn Agreement	Draft legislative resolution	Accepted	52 0 0	27 0 0
11 Feb, 2021	Safety of the nuclear power plant in Ostrovets (Belarus)	Motion for resolution	Accepted	52 0 0	27 0 0
10 Mar, 2021	A WTO-compatible EU carbon border adjustment mechanism	Motion for resolution	Accepted	24 0 28	0 0 27
25 Mar, 2021	Implementation of the Ambient Air Quality Directives	Explanatory statement	Accepted	22 27 3	0 27 0
28 Apr, 2021	Soil protection	Motion for resolution	Accepted	52 0 0	27 0 0
18 May, 2021	Research Fund for Coal and Steel	Draft legislative resolution	Accepted	49 1 0	27 0 0
19 May, 2021	A European Strategy for Energy System Integration	Motion for resolution	Accepted	25 27 0	0 27 0
19 May, 2021	A European Strategy for Hydrogen	Motion for resolution	Accepted	24 1 27	0 0 27



20 May, 2021	The Aarhus Regulation	Draft legislative resolution	Accepted	25 0 27	0 0 27
8 Jun, 2021	EU Biodiversity Strategy for 2030	Motion for resolution	Accepted	24 26 1	0 26 1
8 Jul, 2021	General Union Environment Action Programme to 2030	Draft legislative resolution	Accepted	25 25 2	0 25 2
8 Jul, 2021	Establishment of Antarctic Marine Protected Areas and the conservation of Southern Ocean biodiversity	Motion for resolution	Accepted	26 0 25	1 0 25
19 Oct, 2021	Farm to Fork Strategy	Motion for resolution	Accepted	26 3 23	1 3 23
21 Oct, 2021	An EU strategy to reduce methane emissions	Motion for resolution	Accepted	25 27 0	0 27 0
21 Oct, 2021	Climate, Energy and Environmental State aid guidelines ("CEEAG")	Joint motion for resolution	Accepted	24 28 0	0 27 0
21 Oct, 2021	UN Climate Change Conference in Glasgow (COP26)	Motion for resolution	Accepted	25 27 0	0 27 0
24 Nov, 2021	A European strategy for critical raw materials	Motion for resolution	Accepted	50 0 2	26 0 1
15 Dec, 2021	Implementation of the Energy Performance of Buildings Directive	Explanatory statement	Accepted	25 0 27	0 0 27

\* This table contains all relevant roll-call votes between 1 January and 31 December, 2021 in the policy areas of "environment & public health" and "industry, research & energy". It first lists the votes of the 52 MEPs of Poland, then only of those 27 affiliated with the PiS.

\*\* Legend: "vote for"; "vote against"; "abstention"

Source of data: [votewatch.eu](https://votewatch.eu)

## METHODS

To get a picture of the ideational content of Poland's climate and energy policy, qualitative content analysis was conducted based on official statements from the [gov.pl](https://gov.pl) website. The sample includes a total of 29 articles issued by three government bodies: the Chancellery of the Prime Minister, the Ministry of Economic Development and Technology, and the Ministry of Climate and Environment. The stakeholders involved are Prime Minister Mateusz Morawiecki, Minister of

Economic Development and Technology Piotr Nowak, current Minister of Climate and Environment Anna Moskwa, former Minister of Climate and Environment Michał Kurtyka, as well as the Secretaries of State and Undersecretaries of State from the respective institutions. The omission of other major actors, most notably President Andrzej Duda and Leader of Law and Justice Jarosław Kaczyński is the main limitation of the sampling process, and it is due to the lack of archives assembling English-language official statements from these actors.

The timeframe of the research is 1 September – 31 December, 2021 because the study aims to reconstruct the most recent discourse on climate and energy issues. Another reason for focusing on this period is that the autumn of 2021 witnessed several disputed declarations by the government, for example, the debates concerning the NextGenerationEU package, the court case of the Turów lignite coal mine, the Polish Deal, and the reversed pledge to exit coal made at the COP26 summit.

Three keywords were used to determine the sample: “COP 26”, “Green Deal”, and “Fit for 55”. These keywords refer to the most significant documents and international platforms that framed the discussions about climate and energy policy at the EU level. During the qualitative content analysis, the goal was to identify themes in the examined articles that correspond to the keywords and the research question. In other words, the study identifies frames that give information about the willingness or reluctance of the government to endorse the EGD and the goal of climate neutrality. Five frames (technological neutrality, smooth transition, just transformation, energy security, and social acceptance), as well as their interrelations and functions are explained in the following section. The articles chosen are listed in Table 2.

Table 2.  
Articles comprising the analysed sample

Date	Title of article	Ministry	Stakeholder involved
1 Sep, 2021	<a href="#">Polish – Estonian climate dialogue</a>	Ministry of Climate and Environment	Michał Kurtyka
1 Sep, 2021	<a href="#">Deputy Minister Olga Semeniuk at the Industry Next congress</a>	Ministry of Economic Development and Technology	Olga Semeniuk
8 Sep, 2021	<a href="#">Informal meeting of the V4 Ministers of Environment in Budapest</a>	Ministry of Climate and Environment	Adam Guibourgé-Czetwertyński
9 Sep, 2021	<a href="#">Prime Minister: Lower Silesian Hydrogen Valley will contribute to the development of our economy</a>	The Chancellery of the Prime Minister	Mateusz Morawiecki
20 Sep, 2021	<a href="#">The Polish government secures the energy interests of millions of Poles</a>	The Chancellery of the Prime Minister	Piotr Müller
21 Sep, 2021	<a href="#">Minister of Climate and Environment, Michał Kurtyka, joins the 65th General Conference of the International Atomic Energy Agency (IAEA)</a>	Ministry of Climate and Environment	Michał Kurtyka
21 Sep, 2021	<a href="#">7th DISE Energy Congress</a>	Ministry of Climate and Environment	Ireneusz Zyska, Piotr Dziadzio
22 Sep, 2021	<a href="#">Prime Minister Mateusz Morawiecki Meets US Secretary of Energy under the Polish-American Strategic Energy Dialogue</a>	The Chancellery of the Prime Minister	Mateusz Morawiecki





24 Sep, 2021	<a href="#">U.S. and Polish officials continue strategic talks on nuclear, RES and energy sector transformation</a>	The Chancellery of the Prime Minister	Piotr Naimski
29 Sep, 2021	<a href="#">Deputy Minister Niedużak at the COMPET Council on industrial energy transition and strengthening the competitiveness of SMEs</a>	Ministry of Economic Development and Technology	Marek Niedużak
7 Oct, 2021	<a href="#">Vice-Minister Guibourgé-Czetwertyński at the meeting of the EU Environmental Council</a>	Ministry of Climate and Environment	Adam Guibourgé-Czetwertyński
15 Oct, 2021	<a href="#">Vice-Minister Edward Siarka at the conference on the European Green Deal</a>	Ministry of Climate and Environment	Edward Siarka
18 Oct, 2021	<a href="#">Meeting between Minister Kurtyka with Director General of the International Atomic Energy Agency</a>	Ministry of Climate and Environment	Michał Kurtyka
19 Oct, 2021	<a href="#">Minister Michał Kurtyka during the Perspectives of Electromobility Development debate. Polish and British priorities</a>	Ministry of Climate and Environment	Michał Kurtyka
21 Oct, 2021	<a href="#">Virtual annual meeting of the World Bank</a>	Ministry of Climate and Environment	Michał Kurtyka
22 Oct, 2021	<a href="#">Minister Kurtyka in Brussels about the energy prices</a>	Ministry of Climate and Environment	Michał Kurtyka
22 Oct, 2021	<a href="#">EFNI with the participation of the Ministry of Development and Technology on the condition of the Polish economy: digital and green transformation is ahead of us</a>	Ministry of Economic Development and Technology	Olga Semeniuk, Marek Niedużak
25 Oct, 2021	<a href="#">Vice-Minister Adam Guibourgé-Czetwertyński at the meeting of the Working Group on Climate within the Conference on the Future of Europe</a>	Ministry of Climate and Environment	Adam Guibourgé-Czetwertyński
27 Oct, 2021	<a href="#">Deputy Minister Adam Guibourgé-Czetwertyński at the EU Energy Council</a>	Ministry of Climate and Environment	Adam Guibourgé-Czetwertyński
28 Oct, 2021	<a href="#">Debate on challenges facing the Polish economy at Impact'21</a>	Ministry of Economic Development and Technology	Olga Semeniuk, Marek Niedużak, Artur Soboń, Piotr Uściński
1 Nov, 2021	<a href="#">Energy transition must be fair and ensure citizen security, says Prime Minister Morawiecki at COP26 Summit</a>	The Chancellery of the Prime Minister	Mateusz Morawiecki
5 Nov, 2021	<a href="#">Deputy Minister Małgorzata Golińska at ESG Congress - Polish Business Power</a>	Ministry of Climate and Environment	Małgorzata Golińska
9 Nov, 2021	<a href="#">Minister Anna Moskwa's visit to COP26 climate summit in Glasgow</a>	Ministry of Climate and Environment	Anna Moskwa
19 Nov, 2021	<a href="#">Meeting of Ministers of the Visegrad Group countries on nuclear energy</a>	Ministry of Climate and Environment	Adam Guibourgé-Czetwertyński
25 Nov, 2021	<a href="#">Minister Piotr Nowak at the EU Competitiveness Council (COMPET)</a>	Ministry of Economic Development and Technology	Piotr Nowak
29 Nov, 2021	<a href="#">Minister Moskwa in Katowice: work on the CBAM mechanism as an opportunity to discuss the whole ETS system</a>	Ministry of Climate and Environment	Anna Moskwa
2 Dec, 2021	<a href="#">Minister Anna Moskwa at the meeting of the EU Energy Council</a>	Ministry of Climate and Environment	Anna Moskwa, Adam Guibourgé-Czetwertyński
9 Dec, 2021	<a href="#">Deputy Minister Dziadzio at the 23rd World Petroleum Congress</a>	Ministry of Climate and Environment	Piotr Dziadzio
22 Dec, 2021	<a href="#">Prime Minister Mateusz Morawiecki announces new transformation programme for Silesia</a>	The Chancellery of the Prime Minister	Mateusz Morawiecki

Source: [gov.pl](https://gov.pl)

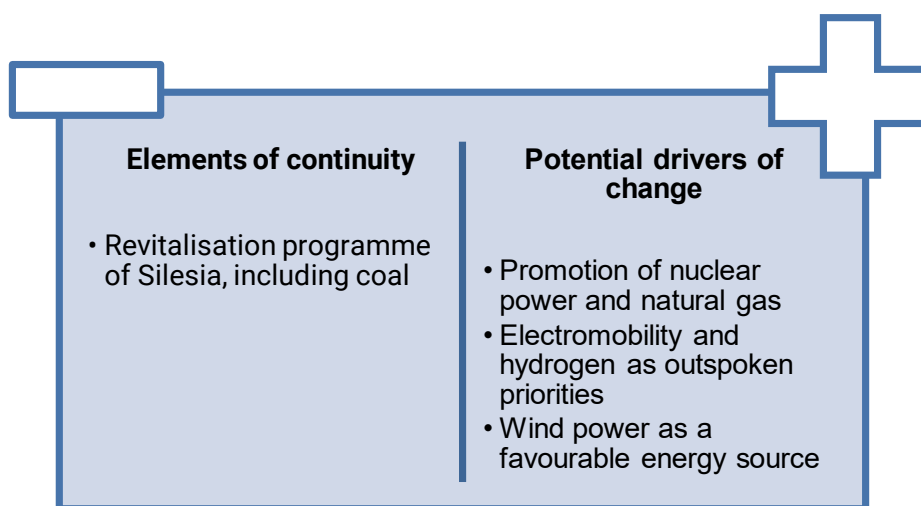
## DISCURSIVE ELEMENTS

### TECHNOLOGICAL NEUTRALITY

The concept of technological neutrality has been [repeated by Polish decision-makers several times](#) since the beginning of discussions regarding the EGD. According to the joint statement of the Visegrád Group on nuclear energy, the main idea is that given the speed of environmental change, “in order to achieve the common European climate and energy goals, the European Union urgently needs to establish a support framework for all projects and technologies able to reduce greenhouse gas emissions”. This argument has been used by the Polish government to legitimise transitional technologies that are not unequivocally accepted as clean energy sources by European legislations.

Figure 2.

Summary of the elements of the discourse on technological neutrality, including those that maintain and those that challenge the coal regime



The examined publications mention several technological investments that are endorsed by the wider EU public as well. These include [electromobility](#), [offshore wind-power generation](#), and the so-called [hydrogen economy](#). The two most conflictual technologies the Polish government advocates, however, are nuclear energy generation and natural gas utilisation. An important sign of Poland’s dedication to these technologies is the initiation of the Polish-American Strategic Energy Dialogue, under which the two countries have strengthened cooperation in the [LNG sector](#) and established a long-term partnership aiming at the construction of [nuclear power plants in Poland](#). According to former Minister of Climate and Environment Michał Kurtyka at [the 65th General Conference of the International Atomic Energy Agency](#), Poland cannot achieve climate neutrality unless it starts to develop nuclear capacities.



Its traditional ally to promote nuclear energy at the EU level is the Visegrád Group, but France has also emerged recently as a potential supporter of this endeavour, as Électricité de France (EDF) has offered to build [four to six new reactors](#) in Poland.

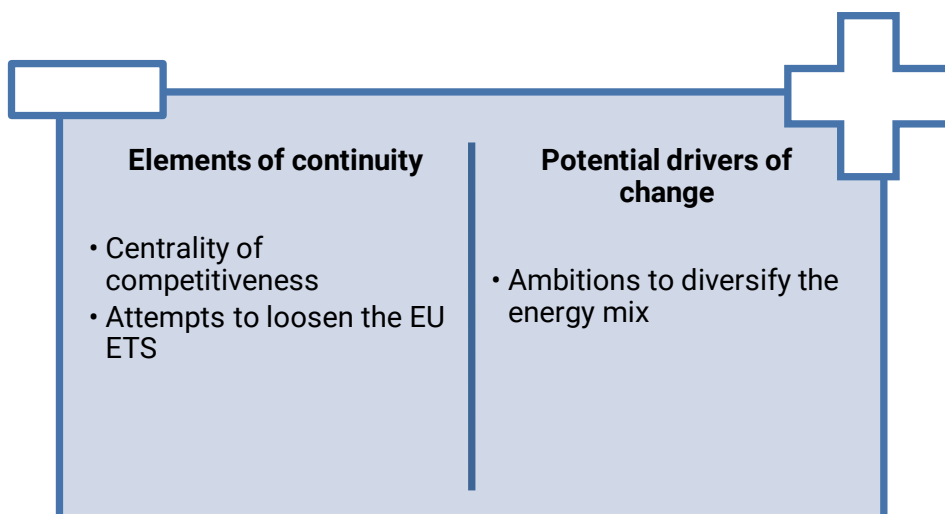
Natural gas is also seen as [essential](#) for meeting the country's targets set in the Paris Agreement. A further indicator of the importance of technological neutrality to the government is the [revitalisation programme of Silesia](#), where wind and sun-based innovations are proposed to couple with hydrogen, nuclear, natural gas, and coal technologies.

### SMOOTH TRANSITION

Technological neutrality is an important principle in the discourse of the Polish government to guarantee a smooth transition, a just transformation, and energy security. In the examined articles, smooth transition is mainly viewed from an economic perspective, with the goal of preserving Poland's [competitiveness](#), i.e. "[to build strong economies based on modern, environmentally friendly industry](#)". Secretary of State Olga Semeniuk emphasized the same point at the [Industry Next congress](#), claiming that the maintenance of a competitive industry and the support of entrepreneurs should be the primary focus of the EU while combatting climate change. A smooth transition, according to the narrative, encompasses not only a [diversified energy mix](#) but also several financial and legal instruments, for instance [reforms in the taxonomy system](#) to provide ideal conditions for green investment, [monitoring schemes](#) to track the impact of the Fit for 55 package on industries, and [greater flexibility to states](#) when using the EU Emission Trading System (ETS).

Figure 3.

Summary of the elements of the discourse on a smooth transition, including those that maintain and those that challenge the coal regime



## JUST TRANSFORMATION

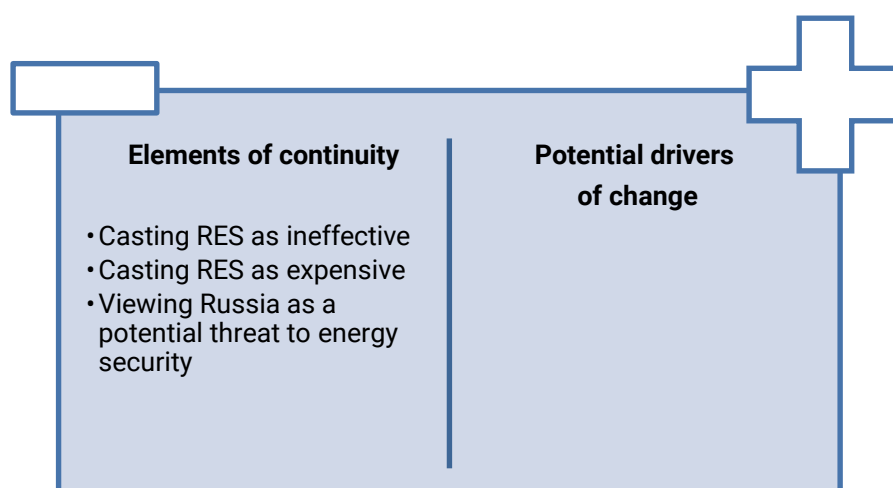
Perhaps the most common argument formulated by Polish politicians against the EGD is that it fails to establish the preconditions for a just transformation. This concept is understood both at a supranational and a societal level.

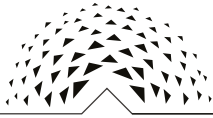
At the supranational level, the diverging [starting points](#) of EU member states are voiced as a concern, which is the difference in their wealth, economic development, financial reserves, and the uneven distribution of costs between regions. Prime Minister Mateusz Morawiecki echoed this argument at the [COP26 summit](#), drawing attention to the development gap between Western Europe and those countries that “could not develop normally after World War II”.

At the societal level, the government’s referent objects are the most [vulnerable consumers](#). As current Minister of Climate and Environment Anna Moskwa put it at the meeting of the [EU Energy Council](#), “we [Poland] should also be very careful as regards changes likely to lead to increasing burden on society and as early as at this stage we should properly ensure the protection of vulnerable recipients”. The Ministry of Climate and Environment states that the proposed extension of the EU ETS, to also include transport and buildings, would lead to [negative social impacts](#), notably higher energy and electricity prices. The decarbonisation targets of the [Fit for 55 package](#) are criticised by the same token, claiming that the costs of transformation would inevitably trickle down to the citizens and [small and medium-sized enterprises](#).

Figure 4.

Summary of the elements of the discourse on a just transformation, including those that maintain and those that challenge the coal regime





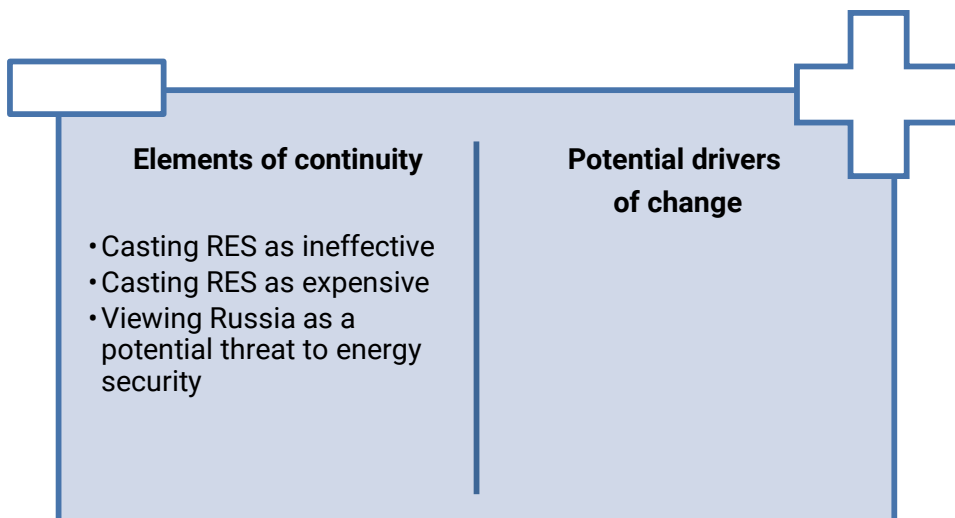
## ENERGY SECURITY

As a twin concept of just transformation, energy security often appears in the examined sources, and it is also apparent at two different levels. At the national level, the government emphasises [stable energy production](#) as a [pivotal move to reaching](#) energy security. That is how the concepts of technological neutrality (Section 4.1.) and smooth transition (Section 4.2.) are linked to energy security in the narrative of PiS. According to Undersecretary of State [Piotr Dziadzio](#), “in our geographical location [*in Poland*], the renewable energy sources are insufficient to ensure stability of energy system alone; Poland will withdraw from fossil fuels on a wide scale only after construction of the first nuclear reactors”.

Likewise, energy security was a key motive behind the decision not to close the [Turów lignite coal mine](#). In this case, the notion was perceived at the societal level, with reference to the livelihood of local citizens. According to the examined articles, the main threat to individuals is [increasing energy prices and energy poverty](#), which should not be exacerbated by the EGD and the Fit for 55 package. To underline the importance of energy security, Undersecretary of State Adam Guibourgé-Czetwertyński articulated [fears of Russia’s expanding influence](#) on Europe’s energy markets at the meeting of the EU Energy Council. The threatening developments he mentioned included Gazprom’s interventions in the natural gas sector and potential violations of competition law regarding the Nord Stream 2 project.

Figure 5.

Summary of the elements of the discourse on energy security, including those that maintain and those that challenge the coal regime



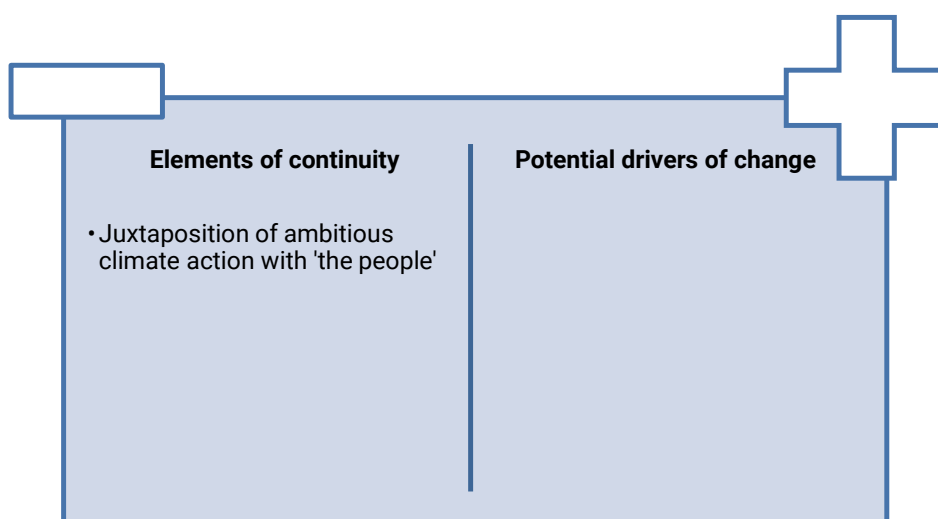
To avoid the concerns of the PiS-led government that were summarised in Section 4.3. and Section 4.4., Poland is demanding an increase in the [modernisation fund](#), the [revision](#) of the EU ETS and the targets of the Fit for 55 package, as well as the establishment of [investment support and compensation schemes](#). At the diplomatic level, the country urges the EU to listen to all parties and seek [compromise solutions](#). Finally, the examined documents call for the incorporation of the concepts of technological neutrality and smooth transition into the dialogue since, according to the government’s narrative, they are [interrelated](#) with just transformation and energy security.

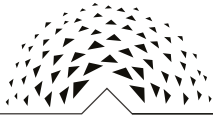
### **SOCIAL ACCEPTANCE**

The discourse of the Polish government about climate and energy policy often uses ‘the people’ as a referent object. At the COP26 summit, [Prime Minister Mateusz Morawiecki](#), for instance, pointed out that “the energy transition must be fair and ensure citizen security”. Securing the operation of the [Turów coal mine](#) also fed into the discourse that set ambitious climate policy against the interests of citizens. Another example is Undersecretary of State Adam Guibourgé-Czetwertyński’s speech at the meeting of the [Working Group on Climate within the Conference on the Future of Europe](#), where he said that “without social acceptance, introduction of the ambitious EU solutions in the area of climate policy will be ineffective” (the same point was made by Undersecretary of State Marek Niedużak at the [European Forum for New Ideas](#)). PiS’s appeal to the people is obvious; this frame provides a linkage between the four principles that were discussed in the previous pages.

Figure 6.

Summary of the elements of the discourse on social acceptance, including those that maintain and those that challenge the coal regime





## STRUCTURAL ELEMENTS

Section 4 mapped the five major frames of the Polish government's discourse in autumn 2021 regarding the EGD and the climate ambitions of the EU. As Figures 2-6 portray, the frames of technological neutrality and smooth transition comprise the largest number of elements that have the potential to challenge the coal regime and promote RES. Section 5 adds another layer to this picture by discussing the institutional, economic, and socio-political background of the Polish climate and energy discourse.

### *INSTITUTIONAL AND ECONOMIC FACTORS*

The energy sector in Poland is heavily centralised and run by the state. [Minimal restructuring has occurred since 1989](#), and therefore the system is made up of large entities that are organised in a top-down manner. The policies of PiS have increased government control even further. First, the Ministry of Climate and Environment and the State Treasury have [gained exclusionary control](#) over the domestic climate and energy policy since 2015. Second, the state has extended its influence over the administration of the major energy utilities. Examples of this process include the position of the State Treasury's as the [largest shareholder in various companies](#) (e.g. PGNiG, PGE, Energa, Enea), the role of the state in running the sole operator of the domestic electricity transmission system (PSE), and the [merger of energy companies and mines](#). The rising interconnectedness of political and corporate power in the energy sector has subjugated markets to government objectives. At the same time, this constellation has increased the [influence of the coal regime on political decisions](#) in the form of direct and indirect lobbying. Consequently, mining companies can demand concessions and subsidies more efficiently, as was the case with the [lignite coal mine of Turów](#) in 2021.

As shown above, the structural features of the Polish energy sector do not favour a low-carbon transition. World market processes and EU interventions, however, have the potential to change the priorities of PiS. The price of coal rose rapidly in 2021, becoming [2.5 times more expensive](#) at the end of the year than it was at the beginning of it. Potential [reasons behind](#) this include a colder climate in 2021, increasing natural gas prices, and rising tensions between Russia and NATO. A [possible extension of the ETS](#) to cover emissions from the transport and the construction sectors could further diminish the competitiveness of coal power generation.

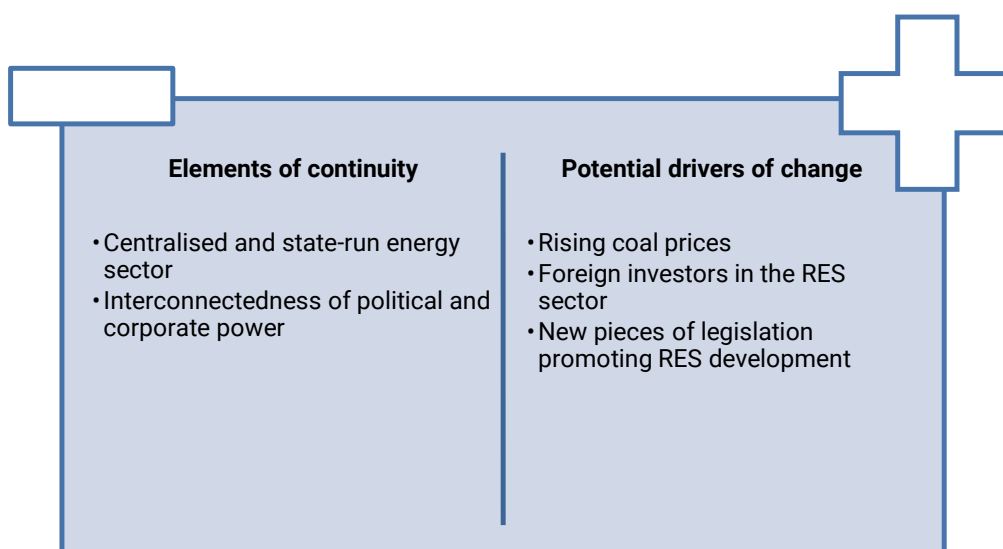
Meanwhile, the price of RES fell rapidly during the last few decades, especially solar photovoltaic and wind energy; in 2019, [both cost more than 50% less](#) than in 2009. An increasing number of foreign investors have [realised the market](#)

[potential of these two sources](#) in Poland. Adapting to changing market structures, the Polish government, therefore, has passed new pieces of legislation, e.g. the [law on electromobility and alternative fuels](#) and the [Polish Offshore Wind Act](#), paving the way for investment in RES.

The future outcomes of the trends seen at the supranational level are difficult to predict (Figure 7). While RES gradually becomes more and more competitive, documents like PEP2040 seem to [prefer natural gas and nuclear power](#) as transitional sources. Further indicators that the current institutional alignment will not change soon are (1) the lack of guarantees that subsidies will stop being granted to the coal industry [before 2049](#) and (2) the government’s plan to [nationalise 70 coal and lignite units](#) under a state-run agency, thus centralising the sector even more.

Figure 7.

Summary of the institutional and economic structure of the coal regime of Poland and potential drivers of change



### SOCIO-POLITICAL FACTORS

Traditionally the high-carbon economy, the government, the mass media, and trade unions have [dominated the discourse](#) on climate and energy issues in Poland. The vested interests of the high-carbon economy and the pro-coal stance of PiS were already touched upon in Section 4.1. The media in Poland has been losing diversity, as the ranking of the country has deteriorated in the [World Press Freedom Index](#) every year. The state-owned mass media platforms convey the messages of PiS: a positive depiction of the coal-based economy and a [limited coverage of climate change](#).



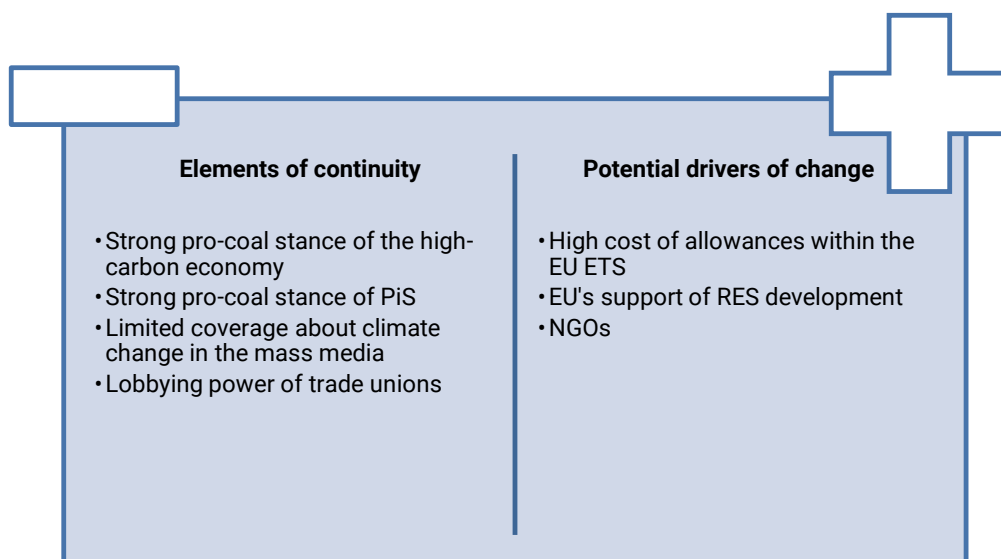


Apart from the media, trade unions are also influential in shaping public opinion. Due to the historical tradition of the unionisation of workers in the coal sector and the great number of jobs ([approx. 100 thousand](#)) dependent on this natural resource, trade unions have [succeeded several times](#) in halting mine closures as well as bargaining for subsidies for the industry. Their concerns about the EGD revolve around its alleged [negative social impacts](#), which threaten mine workers' employment and livelihood. The strategy of trade unions involves petitions, strikes, direct lobbying, and media campaigns taking advantage of the [broad public support for their actions](#).

Since the introduction of the EGD, the socio-political climate of Poland has been undergoing change, enabling supportive actors of the low-carbon transition to gain ground. The EU utilises the [carrots and sticks](#) strategy, supporting RES as well as implementing stricter regulations for coal-fired energy production. The effects of the Covid-19 crisis and the high cost of allowances within the EU ETS has pushed up the price of fossil fuels, pushing Polish energy firms into a [dire financial situation](#). As a consequence, PGE for example has announced that it would reach climate neutrality until 2050. Another outcome of the EU's involvement has been a [turn towards RES](#) in Poland since 2019. The two main targets of investment [are solar power and offshore wind farms](#).

Although the EU has emerged as a major player in breaking Poland's reliance on coal, the domestic actors that are supportive of the low-carbon transition are weak (Figure 8). The only independent party in the Sejm that promotes non-biomass RES is the [Polish People's Party \(PSL\)](#), as The Greens (PZ) joined the Civic Coalition (KO) during the 2019 Polish parliamentary elections. NGOs like Greenpeace, Action Democracy, and Client Earth are [small and inexperienced](#), while independent green media outlets are not influential [beyond their immediate circles](#).

Figure 8.  
Summary of the socio-political structure of the coal regime of Poland  
and potential drivers of change



## CONCLUSIONS AND THE IMPACT OF THE RUSSO-UKRAINIAN WAR

Institutional politics, socio-political forms, economic developments, and discursive expressions of power are all essential in determining a certain climate and energy pathway. This policy brief discussed the structural and discursive realities of Poland's reluctance to adopt the goals of the EGD in the autumn of 2021. Using a mixed methodology of literature review and qualitative content analysis, the paper found that the coal regime of Poland stands on discursive frames that promote principles rooted in the juxtaposition of stringent climate policies and the interest of 'the people'. This discourse is underpinned by congealed structures that include the interlocking of state and corporate interest, and strong pro-coal actors dominating the main channels of communication.

The chief challenger of this constellation is the EU itself, which already appears as the main driver of change in Poland towards decarbonisation. The pledged climate neutrality by 2050, the 55% greenhouse gas reduction target by 2030, the amplification of the EU ETS, and the shift in funding place constant pressure on the government, the greatest sign of which is the deal made to exit coal in 2049. However, Poland's rejection to pay the penalty concerning the Turów lignite coal mine indicates that the EU still lacks the means to efficiently enforce environmental law. As long as no intrinsic change happens that involves the emergence of influential domestic pro-low-carbon-transition actors (e.g. parties, NGOs, enterprises), the possibilities of the EU will remain limited.

Russia's intervention in Ukraine on 24 February, 2022 has introduced challenges for European states not seen since the world wars. As a result of the intense security situation and the [doubling of the price of natural gas](#) since March 2022, the frame of energy security has become more pronounced in Poland. The "de-Russification" of imported fossil fuels has been repeatedly declared by Prime Minister Morawiecki. Referring to the construction of the Baltic Pipe, for example, he claimed in a [meeting with Federal Chancellor of Austria Karl Nehammer](#) that Poland "will be completely independent of Russian gas in six months". Likewise, at the [summit of the European Council](#), he presented the government's proposal to impose an embargo on Russian fuel imports. Another sign of Poland's turn away from coal has been the tightening of the [cooperation between the United States of America](#) with regard to [nuclear power](#) generation and [LNG](#). However, the desire to decouple the country's energy industry from Russian resources does not necessarily go hand in hand with the decarbonisation of the economy. Since [no detailed plans have been published yet](#) about the intended process, little is known about the compatibility of the two goals. The looming energy crisis further complicates the picture, and it has become questionable if the government of Poland will have the financial means to enact the policies that are essential to changing the congealed structures and push the country towards a low-carbon pathway.