

Evaluation of the Just Transition Fund



Conclusions of the study

September 2025



Technical Assistance
for European Funds

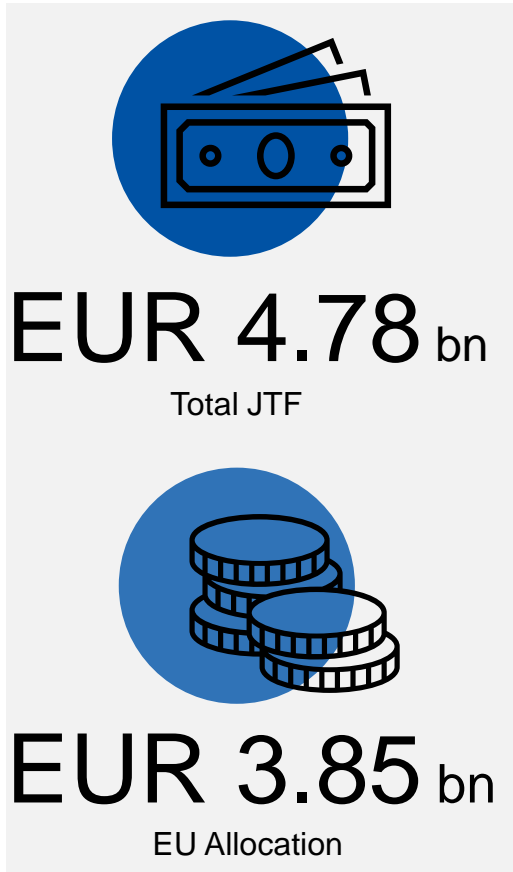


Republic
of Poland

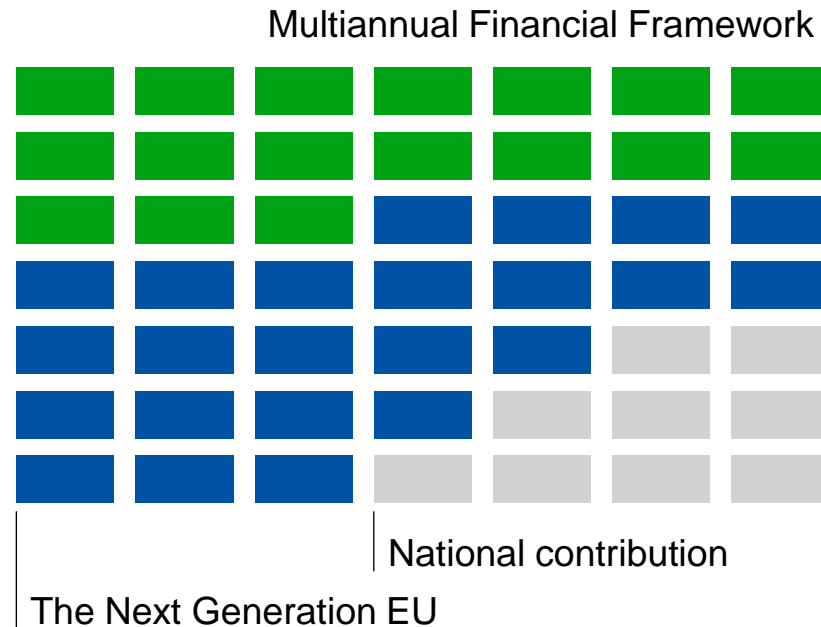
Co-funded by the
European Union



Just Transition Fund in Poland



JTF funding pool sources



The Next Generation EU instrument representing 45% of the JTF must be cleared by the end of 2026.

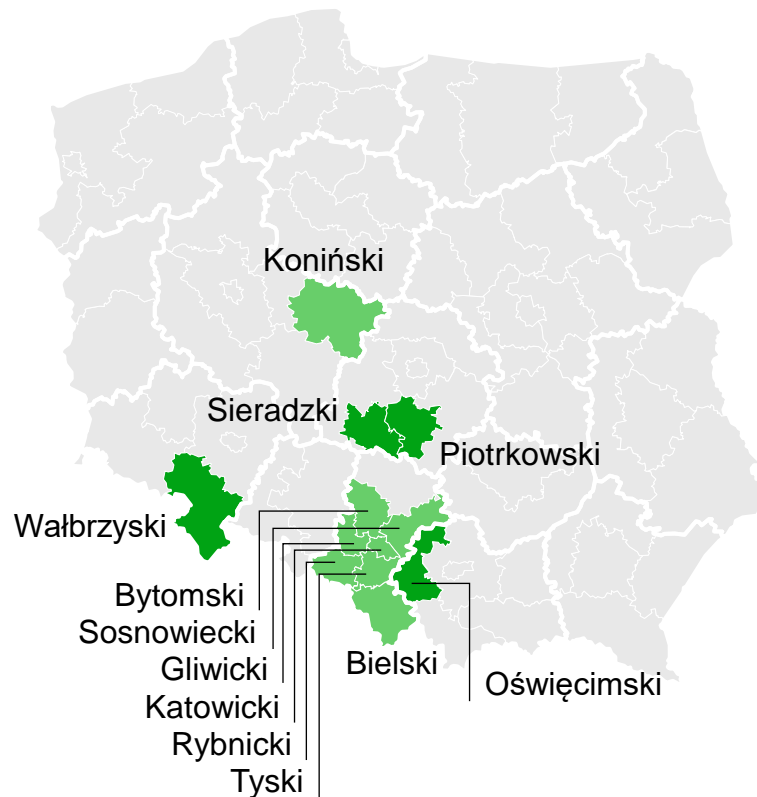
Purpose

mitigating the impact of the transition on the society, employment, the economy and the environment

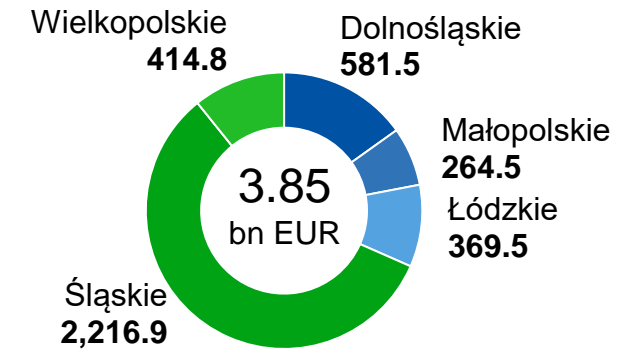
No one will be left behind.

JTF regions

Coal regions in Poland covered by the JTF



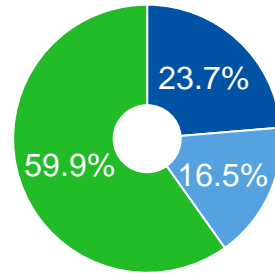
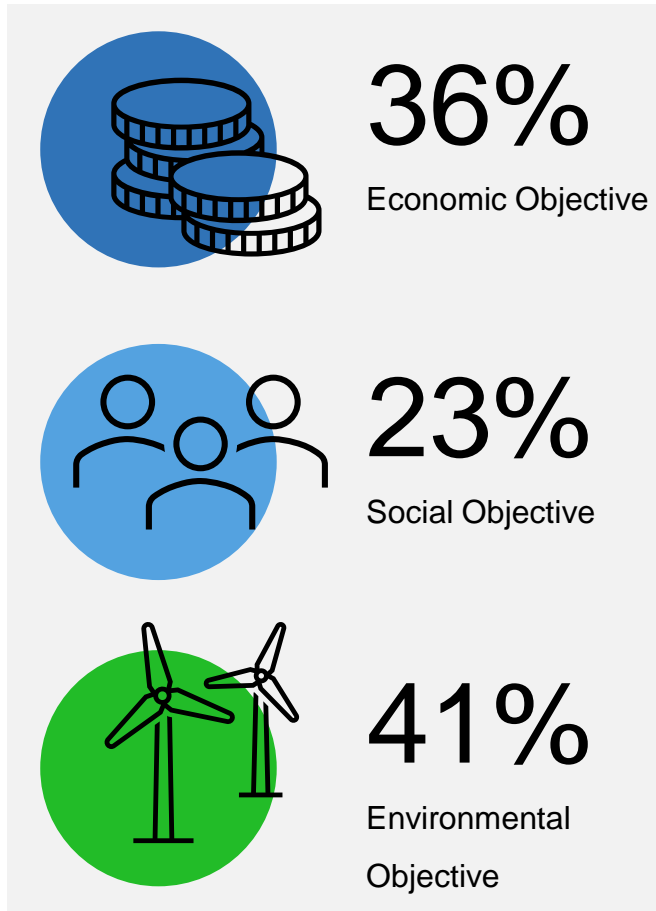
Distribution of EU funds between coal regions (in EUR million)



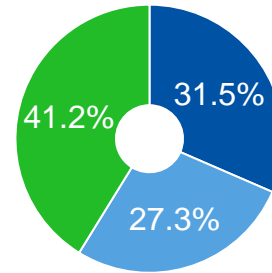
JTF implementation timeline



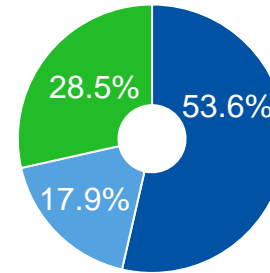
JTF allocation distribution structure



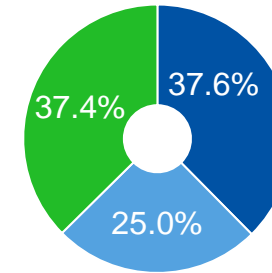
Dolnośląskie



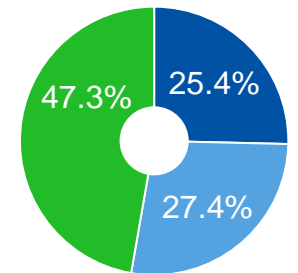
Małopolskie



Łódzkie



Śląskie



Wielkopolskie

Objectives:

- **Environmental** – the largest component of support, including investments in renewable energy sources, thermal modernization of buildings, reclamation of post-mining areas and development of low-emission transport.
- **Economic** – support for enterprises, development of green technologies and innovations, creation of business incubators and retraining of employees to find jobs in new sectors.
- **Social** – modernization of vocational education, improving qualifications in line with the needs of the labour market, development of social services and social inclusion in the just transition process.

Scope of support from the JTF

Economy

- 1 Production investments in SMEs, including micro enterprises and start-ups (diversification, modernization and restructuring)
- 2 Investments to create new businesses and new jobs (including through incubators and consulting services)
- 3 Investments in R&D activities (including those carried out by universities and public research organizations) and the transfer of advanced technologies
- 4 Non-SME production investments
- 5 Investments to achieve greenhouse gas emission reductions

Society

- 1 Upskilling and reskilling
- 2 Job search assistance
- 3 Active inclusion of jobseekers
- 4 Investments in infrastructure for training centres or care for children and the elderly



Only if they are necessary for the implementation of the TPST and are indicated therein

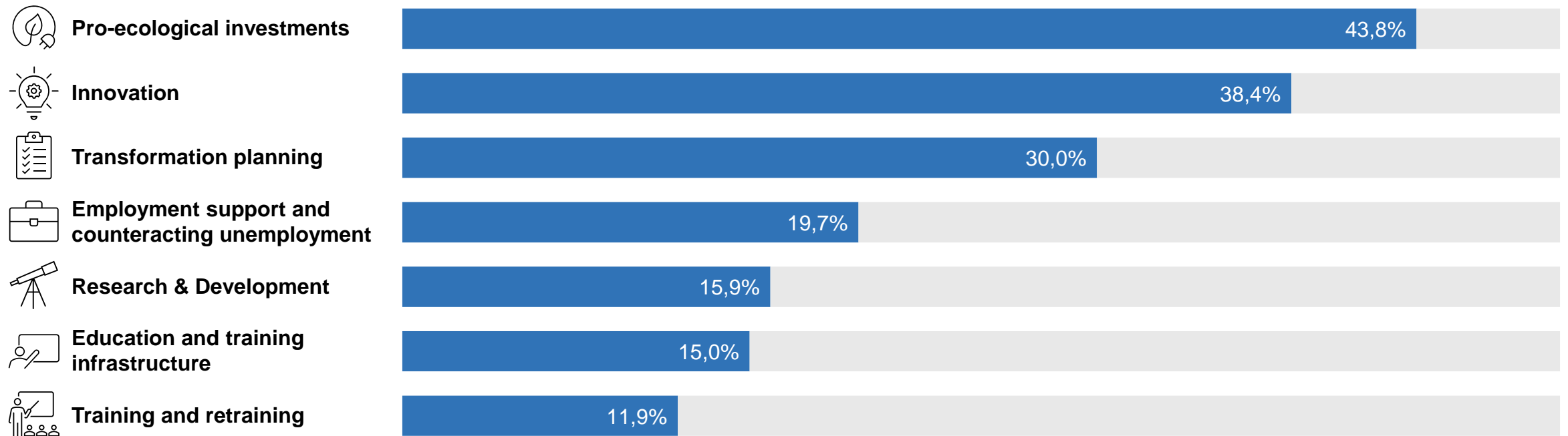
Environment

- 1 Investments in renewable energy
- 2 Investments providing clean energy, including energy storage
- 3 Investments in smart and sustainable local mobility
- 4 Renovation and modernization of heating networks to be based on RES
- 5 Investments in digitization, digital innovation and digital connectivity
- 6 Investments for the revitalization and decontamination of degraded areas
- 7 Investments to strengthen the circular economy

Technical Assistance

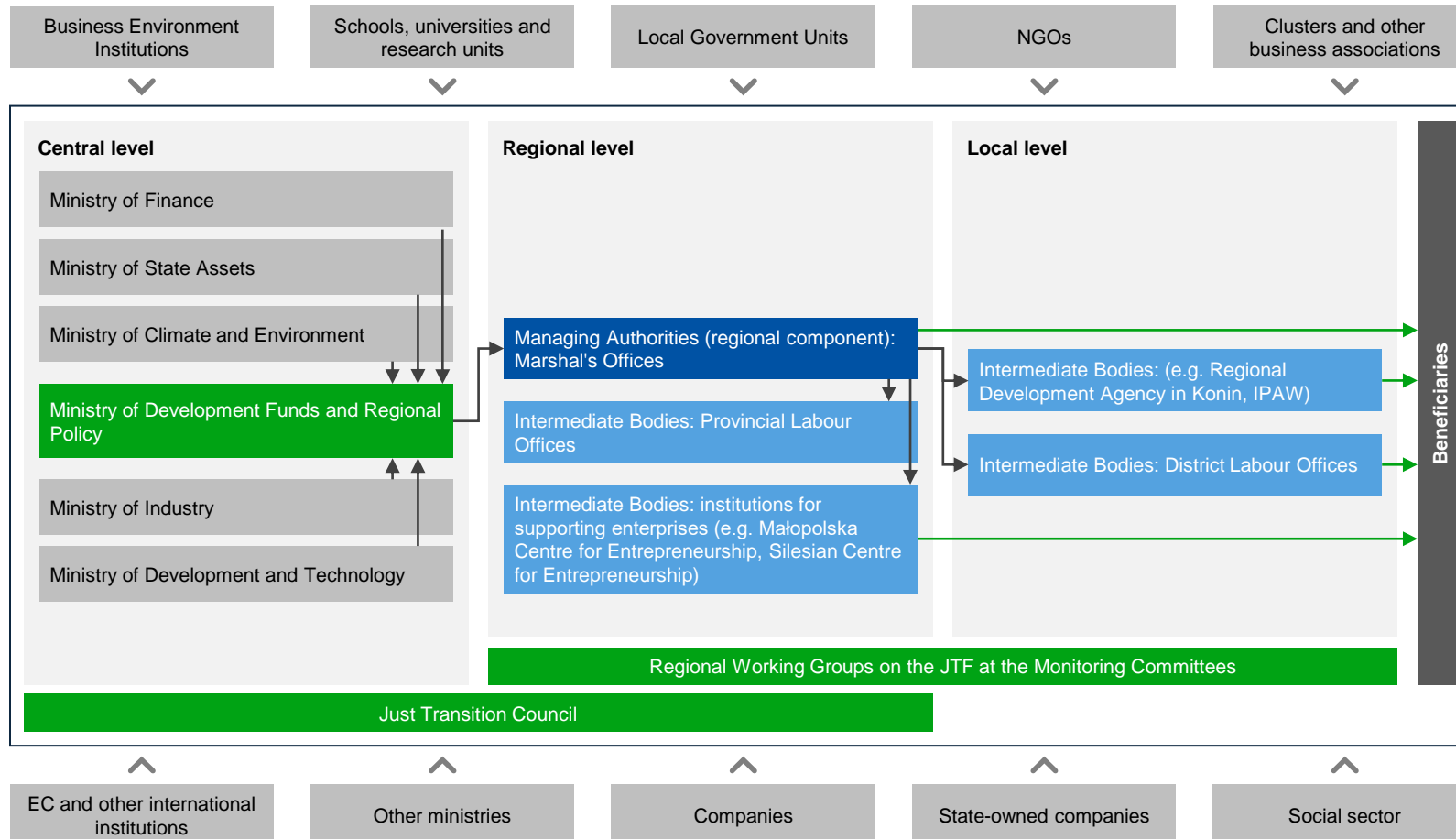
Motivations of beneficiaries (CAWI survey)

Motivation (% of responses)



Source: CAWI survey among JTF beneficiaries, n=322

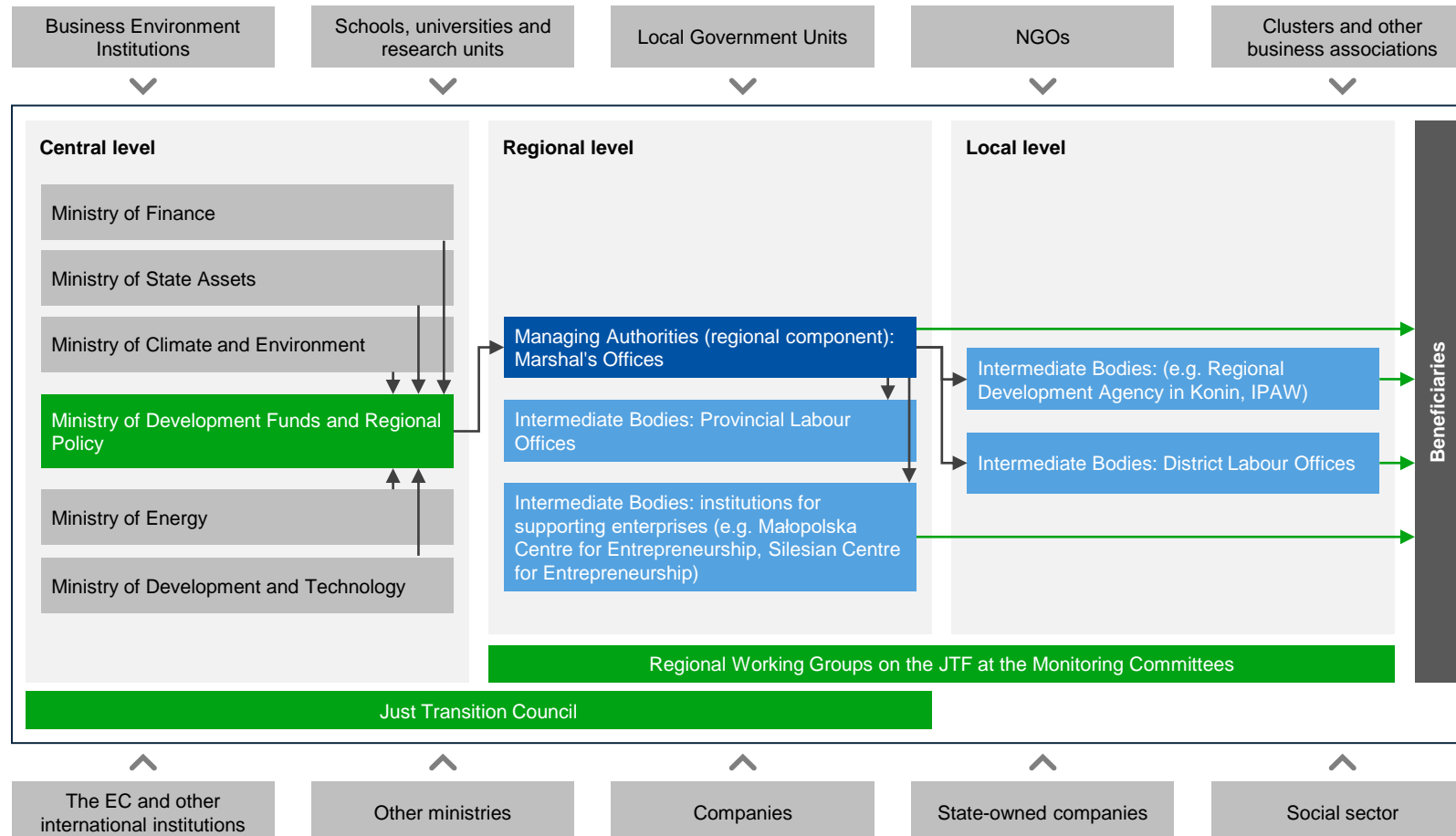
JTF implementation model (as at 21 August 2025)



Comment

- **Lack of central coordination** leads to the dispersion of responsibilities and hinders effective communication between the central and local governments.
- **Ambiguous cooperation mechanisms** They limit the coherence of actions and make it difficult to secure the interests of both the government and the regional side.

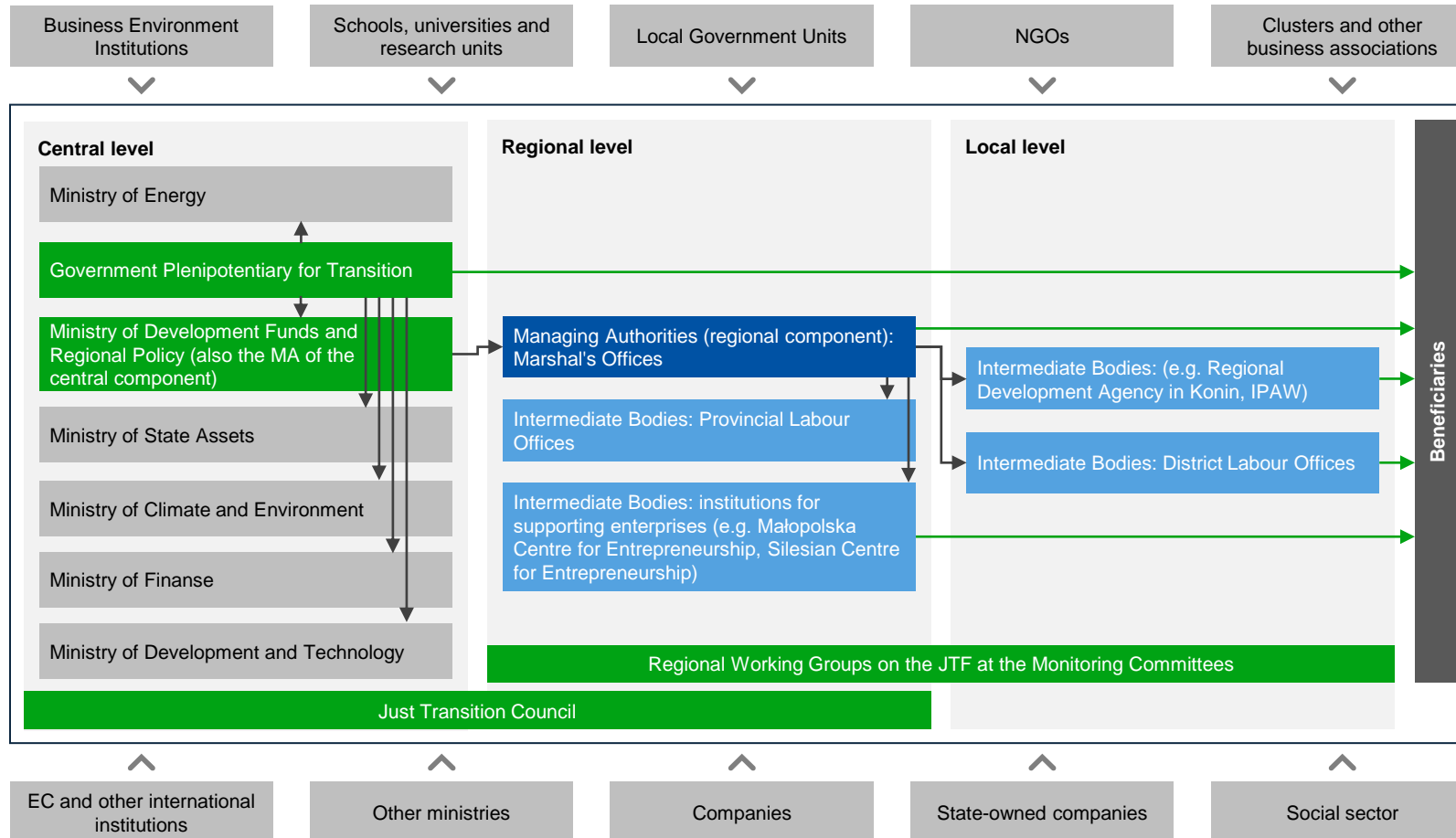
Current JTF implementation model



Comment

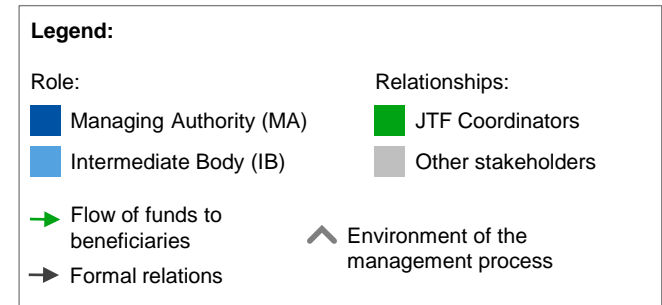
- **The creation of the Ministry of Energy** may bring benefits in the form of better coordination of energy policy. It can also contribute to concentrating responsibility for energy transition, which will facilitate communication and cooperation between the central and local governments.

Proposed changes to the JTF implementation model

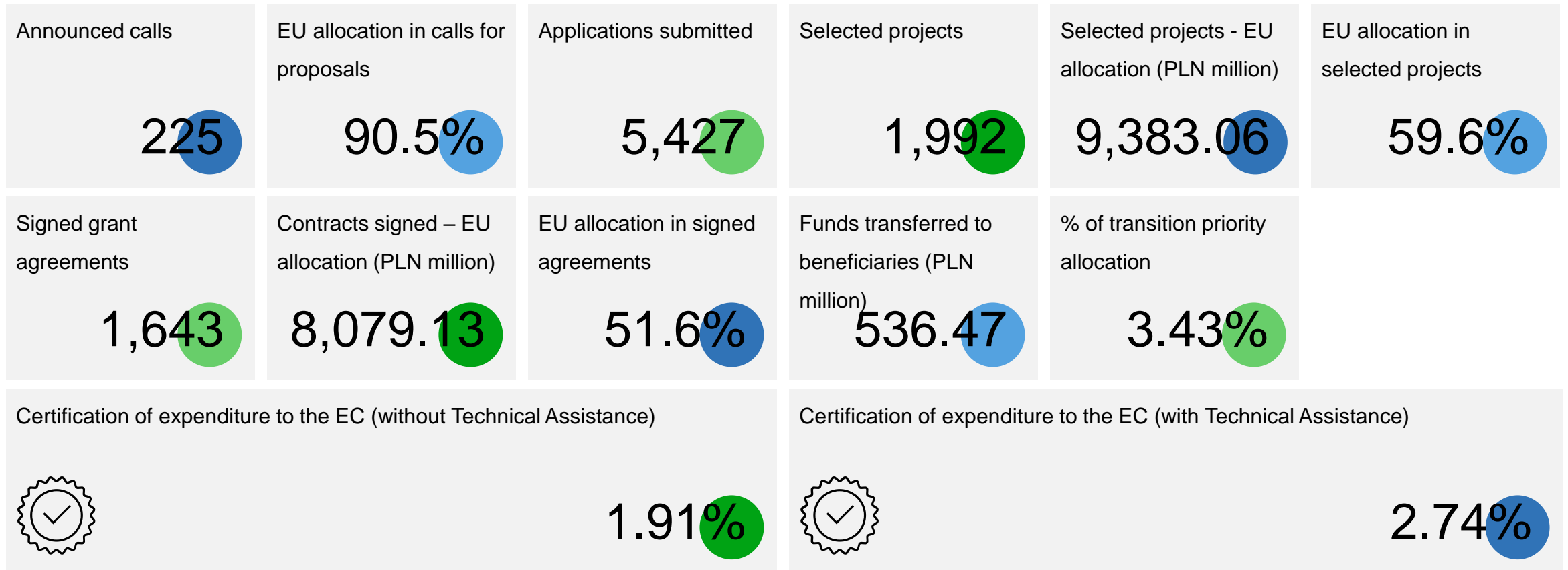


Hybrid model

- **THE JTF Central Component** will enable implementing projects of national importance, while maintaining regional flexibility.
- **Reinforcing the role of MDFRP** will foster better coordination, expert support and the exchange of good practices.



The pace of spending JTF funds



As at 30 June 2025

Use of JTF funds (regions)

	Number of calls announced by 30/06/2025	Number of calls for proposals closed by 30/06/2025	EU allocation in calls in PLN by 30/06/2025	% of EU allocation	Number of applications submitted by 30/06/2025	Number of projects selected for funding by 30/06/2025	Value of projects selected for co-financing in PLN million (EU funds) by 30/06/2025	% of EU allocation
Dolnośląskie	85	77	2,192,468,225	92.7%	1,306	617	1,280.24	53.76%
Łódzkie	23	18	988,103,794	65.7%	629	131	634.89	41.96%
Małopolskie	19	15	1,129,024,783	104.9%	354	203	629.67	58.12%
Śląskie	65	60	8,263,777,034	91.6%	2,529	842	5,832.22	64.25%
Wielkopolskie	33	31	1,592,931,146	94.3%	609	199	1,006.05	59.23%
Total	225	201	14,166,304,982	90.5%	5,427	1,992	9,383.06	59.56%

Use of JTF funds (regions)




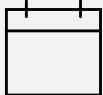



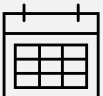
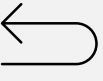



	Signed contracts	Value of EU funds in signed contracts in PLN by 30/06/2025	% of EU allocation	Value of EU funds transferred to beneficiaries in PLN by 30/06/2025	% of transition priority allocation
Dolnośląskie	461	957.81	40.48%	134.66	5.69%
Łódzkie	46	431.55	28.68%	10.59	0.70%
Małopolskie	196	606.90	56.39%	80.58	7.49%
Śląskie	766	5 ,076.82	56.29%	275.96	3.06%
Wielkopolskie	174	1,006.05	59.55%	34.68	2.05%
Sum	1643	8,079.13	51.61%	536.47	3.43%

Use of funds from the Next Generation EU (regions)

	Target for 2025 [EUR]	Target for 2026 [EUR]	Amount [EUR]	STEP advance payment + Certified funds (as at 30/06/2025) [EUR]	Use of NGEU funds (as at 30/06/2025)
Dolnośląskie	162,160,447	164,765,229	326,925,676	203,410,294	62.2%
Łódzkie	103,031,737	104,686,734	207,718,471	113,858,629	54.8%
Małopolskie	73,765,257	74,950,148	148,715,405	92,997,943	62.5%
Śląskie	618,115,800	628,044,588	1,246,160,388	714,840,023	57.4%
Wielkopolskie	115,658,460	117,516,281	233,174,741	133 366 789	57.2%
Total	1,072,731,701	1,089,962,980	2,162,694,681	1,258,473,678	58.19%

Challenges related to spending

Challenges

-  **1**
Delayed start of JTF implementation
-  **2**
Early stage of project implementation
-  **3**
Lengthy project evaluation process
-  **4**
Extension of call for proposal deadlines
-  **5**
Long process of signing co-financing agreements
-  **6**
Delays in selecting contractors
-  **7**
Protracted investment processes
-  **8**
Changes to payment schedules
-  **9**
Refunds of part of advance payments
-  **10**
Ban on financing investments in fossil fuel-based technologies
-  **11**
Low quality of payment applications and requests for complex changes in projects
-  **12**
Challenges related to the verification of public procurement

Actions taken by the MAs and IBs to improve the distribution of JTF funds



1

Intensive activities related to the organization of calls from as early as 2023 (fast pace of work of the Monitoring Committees approving the criteria for calls).



2

Intensive activities in the field of application evaluation, which translates into a 50% level of contracting of JTF funds, with almost 60% of the EU allocation allocated to projects selected for co-financing (as at 30 June 2025).



3

Prioritization of strategic investments – non-competitive projects



4

Intensive promotional and information activities aimed not only at increasing awareness of the possibility of obtaining funding, but also at educating potential beneficiaries in order to prepare the best quality projects.



5

Modifications of the competition criteria/regulations for newly announced competitions in response to difficulties reported by beneficiaries during the implementation of projects.



6

Support for beneficiaries in situations related to project delays, the need to make changes to the project or its schedule.



7

Reallocation of funds between measures aimed at increasing the efficiency of spending the EU allocation.

Barriers

Challenges related to delays in the preparation and negotiation of programming documents for the financial perspective 2021-2027

1

Short deadline for spending the Next Generation EU funds

2

Lack of project readiness of potential beneficiaries

3

Excessive co-financing rate (determined according to the classification by NUTS 2)

4

Inability to raise funds to ensure own contribution to the project

5

Problems of definition and interpretation

6

Regulations on the redevelopment of post-mining and post-industrial areas transferred by the Mine Restructuring Company (SRK)

7

Regulations on the redevelopment of post-mining and post-industrial areas by mining companies or entities related to them

8

Lower than expected interest in participating in projects related to the retraining of people working in the mining industry

9

State aid regulations

10

Limitation of support for mining plants planning transformation and rebranding

11

2024 flood

12

Recommendations for the on-going implementation of the JTF (1/3)

Negotiations with the EC to postpone the deadline for spending funds from the Next Generation EU

1

Simplify procedures, reduce the number of documents required, digitize processes

2

Reduce assessment time and improve IT systems

3

Introduction of advances or special lines of self-ownership support

4

Delays in the launch of the JTF and the pace of spending funds from the Next Generation EU pose a threat that the funds will not be used. It is recommended to negotiate extending the eligibility period, increasing the flexibility of certification and transferring the allocations with the EC.

The complex procedures of the JTF make it difficult to access funds, especially for smaller entities. It is recommended to further simplify documentation, increase the use of lump sums and declarations, digitize processes and increase flexibility in project implementation, taking into account control and audit requirements.

Lengthy evaluation and contracting procedures delay the implementation of projects and discourage beneficiaries. It is recommended to simplify verification, automate processes, implement intuitive IT systems and provide current information about the project status.

Own contribution is a barrier for many non-governmental organizations and local government units in regions affected by the energy transition. It is recommended to reduce the required contribution, to introduce advance payments more widely and to launch special support lines for entities with limited resources.

Recommendations for the on-going implementation of the JTF (2/3)

Greater interpretative support from the MDFRP and the development of a common interpretative framework

5

Where justified, allowing investments in equipment using fossil fuel

6

Ensuring better correspondence of support to the transition stages of the sector

7

Transparent information policy in the transition process

8

The lack of consistent interpretations of regulations hinders the implementation of the JTF, therefore it is recommended to create a common interpretation framework. The MDFRP together with BGK has developed a tool for assessing investments with the use of fossil fuels, the use of which should be discussed during dedicated training for the MAs and IBs.

The ban on support for fossil fuel-based technologies under the JTF causes difficulties and limits the implementation of many investments. In justified cases it is recommended to provide support and to conduct training for the MAs and IBs in the use of the tool developed by the MDFRP and BGK.

JTF support did not always correspond to the actual course of changes in the mining sector. It is recommended to synchronize interventions with restructuring plans, increase the flexibility of the support offer and strengthen the information and advisory component to increase awareness and trust in the solutions offered.

The lack of clear restructuring plans limits the effectiveness of JTF's activities. It is recommended to publish employment schedules, inform about support in advance and involve social partners in the dialogue.

Recommendations for the on-going implementation of the JTF (3/3)

Developing and promoting activities aimed at back office employees and miners' families

9

Miners are less likely to use the support of the JTF than back office employees and their families. It is recommended to tailor activities to the needs of these groups, redirect funds and increase the availability and visibility of social support.

Amending regulations to allow the transfer of land for economic purposes

10

Formal restrictions make it difficult to transfer SRK areas for economic purposes. It is recommended to make legislative changes and develop an aid program agreed with the EC to increase the availability of land for transition projects.

Greater exchange of experience and good practices between regions

11

A non-uniform approach to call documents makes it difficult to apply and leads to inequitable access to funds. It is recommended to create a platform for knowledge exchange, joint training and a catalogue of good practices coordinated by the MDFRP.

Further strengthening of outreach

12

The JTF's information and publicity activities are well evaluated and strengthen public acceptance of the transition, so they should be continued and developed. It is recommended to increase expenditure, use local communication channels and share good practices between regions.

Recommendations for the future of the JTF (1/3)

Continuation of support under the JTF or a similar instrument in the next EU financial perspective

1

Maintaining separate rules for implementing the JTF in relation to other EU funds, including the subsidy nature of support

2

Individual TPSTs for each Polish coal region, including transition strategies

3

Determination of the level of co-financing for subregions covered by the JTF at the NUTS level 3

4

Allowing the thematic scope of the aid to be adapted to the specific situations of the regions

5

The transformation of energy regions in Poland is a long-term process that requires stable and predictable financial and institutional support. Discontinuation of support threatens to inhibit the activities started, deepen the socio-economic effects and lose the trust of local communities.

As a dedicated instrument, the JTF allows for precise adjustment of interventions to local needs and a combination of various forms of support within one project. Maintaining its distinctiveness is crucial for maintaining flexibility, thematic concentration and subsidy nature, which corresponds to the capabilities of local entities.

Coal regions in Poland differ significantly in terms of needs and potential, which is why it is recommended to prepare individual TPSTs taking into account local transformation strategies. Such an approach will increase the effectiveness of interventions, flexibility in project implementation and strengthen the agency of local governments and communities.

Setting the level of co-financing at the NUTS level 3 will allow for better adjustment of the intensity of support to local conditions and needs. It is also recommended to introduce mechanisms (e.g. reduction of own contribution) to facilitate the participation of less affluent entities (local government units, non-governmental organizations).

Although the JTF was designed as a wide-ranging instrument, its practical use is sometimes limited by the EC's interpretations. It is recommended to enable the extension of the scope of support and adaptation to the specific needs of the regions.

Recommendations on the future of the JTF (2/3)

Amending the regulations to allow for the transfer of land for economic purposes

6

The current regulations limit the possibility of using post-mining areas for public purposes only, which hinders the development of entrepreneurship. It is recommended to amend the regulations to enable the transfer of such land to municipalities for economic purposes (among other things, creating an aid program to support their development).

Supporting strategic projects and investors

7

The transformation of regions requires focusing support on strategic projects that build a new economic structure and generate a multiplier effect. It is also recommended to develop a strategy for attracting investors and financing the preparation of investment areas as a key element of development.

Adapting state aid regulations to the realities of JTF implementation

8

The current state aid regulations do not take into account the specificity of JTF projects, which makes their implementation difficult. It is recommended to simplify and unify the rules and develop dedicated mechanisms and guidelines that will facilitate the implementation of projects and increase the availability of support.

Simplifying procedures and increasing flexibility

9

Complicated procedures and lack of flexibility limit the participation of smaller entities in the transformation. It is recommended to further simplify documentation, digitize processes, expand simplified forms of settlements and create simpler support paths for the smallest beneficiaries.

Strengthening the role of the MDFRP and considering the model of hybrid implementation of the JTF

10

The current model of transition management does not ensure coherence of inter-ministerial activities or support for supra-regional projects. It is recommended to implement a hybrid model of JTF management, strengthen the role of the MDFRP and appoint a government plenipotentiary for energy transition in the Ministry of Energy.

Recommendations for the future of the JTF (3/3)

Transformation projects of a supra-regional nature

11

The current system of implementing the JTF does not allow implementing projects of a supra-regional nature. It is recommended to introduce a central component (with dedicated funds) and to develop a National Just Transition Plan that will ensure coherence of activities and better coordination between ministries and regions.

Strengthening information and promotion activities

12

Energy transition requires effective communication that builds social acceptance and commitment of residents. It is recommended to professionalize and finance information activities as an integral part of projects, with the use of modern tools and the promotion of good practices.

To create a platform for knowledge exchange and interpretation accessible to all regions

13

There is no systemic space for sharing experiences between JTF regions. It is recommended to create a nationwide platform for the exchange of knowledge, supporting cooperation, access to interpretations, document templates and good practices.

Developing uniform definitions and standards at national level

14

The lack of consistent definitions of key terms hinders the implementation of the JTF and leads to divergent interpretations. It is recommended to develop an official glossary of terms and a catalogue of standards, which will be a reference point for all participants in the transformation process.

Support for the preparation of projects

15

The lack of project readiness, especially in less affluent local government units, limits the possibility of applying for JTF funds. It is recommended to introduce a dedicated mechanism for financing pre-investment documentation, which will increase the number of high-quality projects and accelerate the pace of transformation.

Evaluation methodology

The study covered all Polish regions using the JTF and selected European countries

Researched over

90

documents, including legal acts and national and EU guidelines, national, EU and regional strategic and programme documents, reports, including evaluation reports, as well as public data and statistics.

Conducted

46

in-depth interviews with key JTF stakeholders, including beneficiaries (85 people were surveyed).

Completed

150

CATI telephone surveys and

322

CAWI computer surveys with JTF beneficiaries.

Expert panels with stakeholders of each of the

5

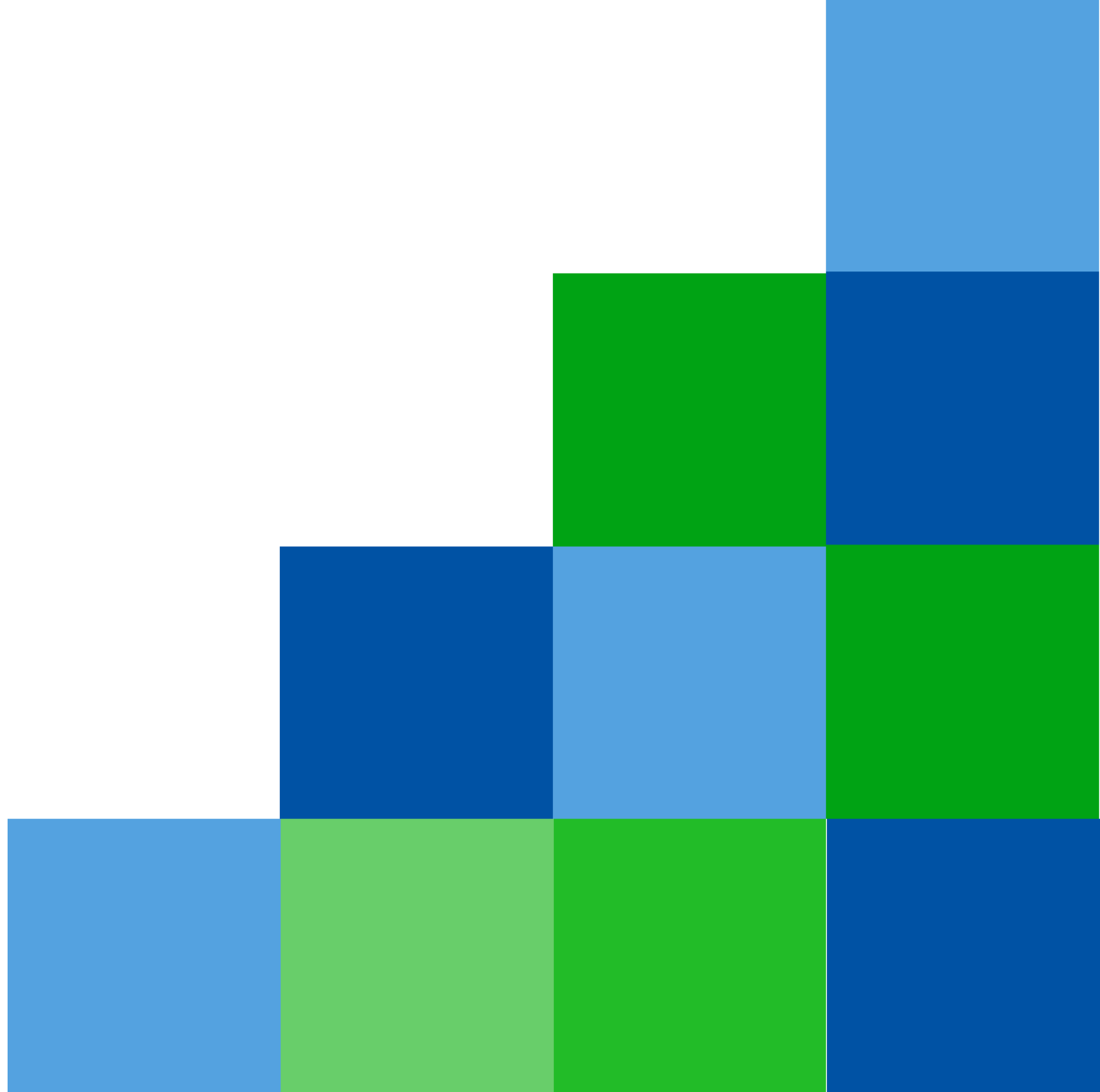
coal regions.

Developed

33

case studies (both national and European)

Thank you



Recommendations for the on-going implementation of the JTF

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Simplifying procedures, reducing the number of documents required, digitizing processes

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Allowing, where justified, investments in machinery and equipment using fossil fuels

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Better connection between the support and particular stages of the sector's transition

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