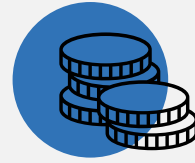




## JTF objective

The Just Transition Fund aims to mitigate the effects of transitions on society, employment, the economy and the environment.

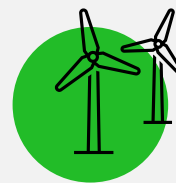
*No one will be left behind.*



**36%**  
Economic Objective



**23%**  
Social Objective



**41%**  
Environmental Objective

## Regions covered by the Fund

The funds went to five regions: Dolny Śląsk, Łódź, Małopolska, Śląsk and Wielkopolska, which are most exposed to the negative effects of the energy transition.

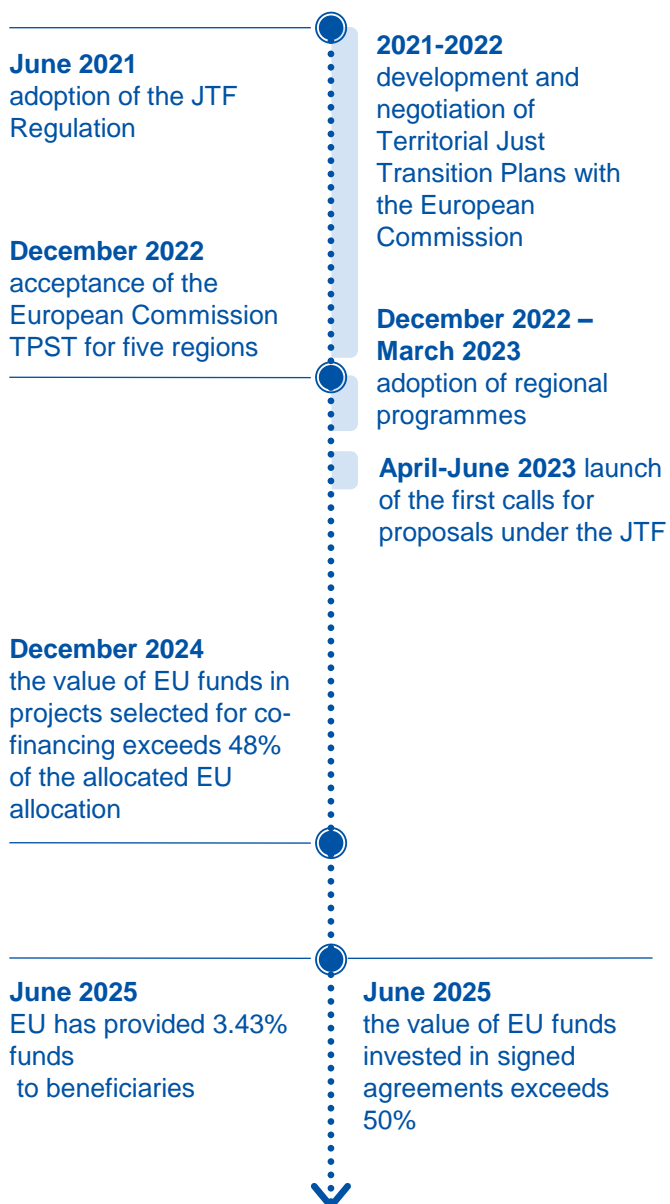
The selection of the regions was based on clearly identified needs and challenges:

- These regions have been basing their economies on mining and carbon-intensive sectors for decades.
- The energy transition requires urgent transformations of local economies into more sustainable, innovative and climate-resilient ones.
- The local governments of these voivodeships have developed Territorial Just Transition Plans (TPST), which clearly define the directions and objectives of the transition.

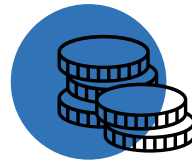


## JTF implementation timeline

The implementation of the Just Transition Fund began with a two-year delay due to protracted negotiations between the European Commission and the Polish side, as well as the need to adapt the national strategy papers to the EU's requirements regarding climate and social objectives.



## Scope of support



### Economic Objective

- Production investments in SMEs, including micro-enterprises and start-ups, leading to economic diversification, modernization and restructuring;
- Investments in the creation of new businesses, including through business incubators and consulting services leading to the creation of new jobs;
- Investments in research and innovation activities, including those carried out by universities and public research organizations, and activities supporting the transfer of advanced technologies;
- Non-SME production investments;
- Investments to achieve greenhouse gas emission reductions.

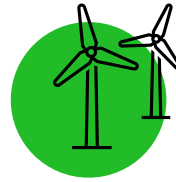


*Only if they are necessary for the implementation of the TPST and are indicated therein*



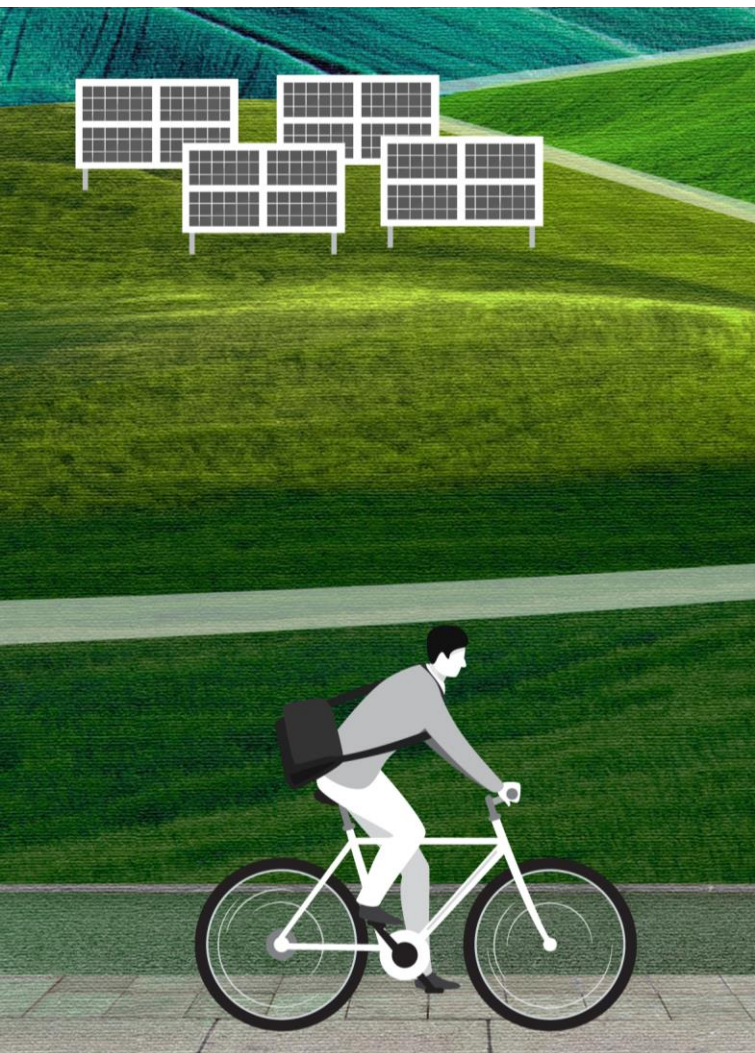
## Social Objective

- Upskilling and reskilling of workers and jobseekers;
- Job search assistance;
- Active social inclusion of jobseekers;
- Other activities in the area; education and social inclusion, including investments in infrastructure for training centres and care facilities for children and the elderly.



## Environmental Objective

- Investments in renewable energy and in energy efficiency to reduce energy poverty;
- Investments in clean energy, including the deployment of energy storage technologies, and the reduction of greenhouse gases;
- Investments in smart and sustainable local mobility, including the decarbonization of the local transport sector and its infrastructure;
- Renovation and modernization of heating networks to be based on RES;
- Investments in digitalization, digital innovation and digital connectivity;
- Investments for the revitalization and decontamination of degraded areas;
- Investments in strengthening the circular economy by preventing and reducing waste, resource efficiency, reuse, repair and recycling.



## JTF beneficiaries

The Just Transition Fund has been designed to respond to the needs of diverse groups of recipients. The catalogue of beneficiaries is exceptionally wide.

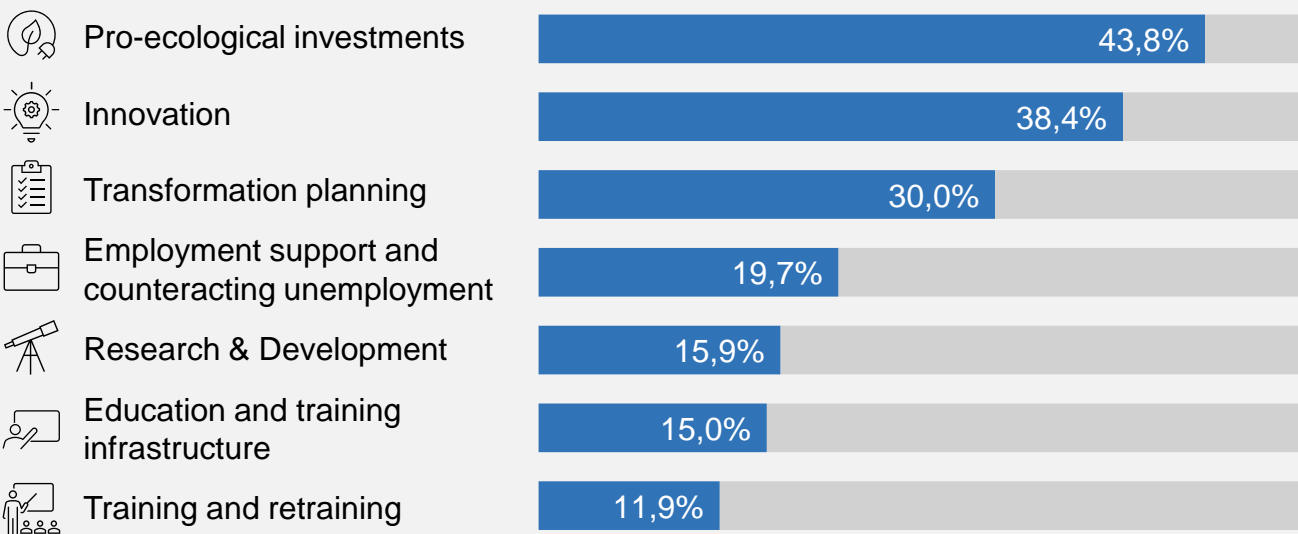
JTF can be used among others, by:

- Local government units – implementing infrastructural, social and environmental investments.
- Enterprises – implementing innovations, new technologies and green solutions, and creating new jobs.
- Non-governmental organizations – engaging in social, educational and activating tasks.

- Education and training institutions – developing competences of the inhabitants of the regions affected by the transition.
- Public entities – implementing strategic projects, revitalizing post-industrial areas, developing green mobility and green energy, investing in social infrastructure and supporting education and the labour market.
- Social and economic partners – supporting dialogue and transition planning.

With such a broad catalogue, the JTF enables the coordination of the activities of many players – from local leaders to large institutions – and truly supports just change in the regions.

### Motivations of JTF beneficiaries



Source: CAWI survey among JTF beneficiaries, n=322

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## Pace of spending JTF funds

as at 30 June 2025

The approval of the TPST by the European Commission as late as December 2022 meant that Polish regions started implementing the JTF with a delay. Particular pressure is on funds from the Next Generation EU, which represent 56% of the total JTF allocation and must be cleared by the end of 2026. The first calls were announced in spring 2023, and by the end of June 2025, the regions replied to 225 calls, of which 201 were completed.

Announced calls

225

The value of EU funds allocated in these calls exceeded PLN 14 billion, which is over 90% of the available allocation.

EU allocation in calls  
for proposals

90.5%

By mid-2025, more than 5.4 thousand applications had been submitted, and nearly 2 thousand projects had received a positive

Selected projects

1 992

The value of projects selected for co-financing at the end of June 2025 amounted to PLN 9.38 billion, which corresponds to almost 60% of the total JTF allocation. In the first half of 2025, more than PLN 3 billion was contracted, which shows a clear acceleration in the activities of implementing institutions.

EU allocation in  
selected projects

59.6%

Despite the intensification of calls and contracts, the actual disbursement of EU funds to beneficiaries remains low. By June 2025, PLN 536 million has been transferred, which is only 3.4% of the allocation.

EU allocation paid to  
beneficiaries

3.4%

The certification of the measures by the EC is also progressing slowly. The full use of funds, in particular from the Next Generation EU instruments, remains a major challenge for implementing institutions.

## Challenges in spending

Delayed start of JTF implementation



The two-year delay in the start of implementation compared to the beginning of the financial perspective has a direct impact on the pace of spending funds from the JTF

Early stage of project implementation



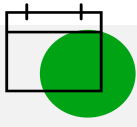
A significant number of projects are at the initial stage, which results in a low value of the requested refunds.

Lengthy project evaluation process



The accumulation of competitions in a short period of time led to a prolonged evaluation process in some calls, which delayed the signing of contracts and the start of implementation.

Extension of recruitment deadlines



Especially in the case of large priority projects, the lack of readiness of applicants resulted in the need to extend the deadlines for recruitment.

A long process of signing co-financing agreements



This often results from the incomplete readiness of beneficiaries and deficiencies in documentation.

Delays in selecting contractors



Many tenders were cancelled due to the lack of bids, which resulted in the need to re-announce them and delays in implementation.

Protracted investment processes



This is especially true of large projects, where the process of selecting contractors is long and often subject to appeals.

Changes to payment schedules



Due to delays, beneficiaries applied for a reduction in the amount of tranches or a change in their date. The MA agreed if the delays were not due to the beneficiaries' negligence.

Refunds of part of advance payments



In order to avoid accruing interest (Article 189 of the Public Finance Act), beneficiaries returned unused funds, which affected the overall level of spending.

Ban on financing investments in fossil fuel-based technologies



Waiting for the EC's interpretation and the position of the MDFDP in the field of 'viable alternative technology' caused significant delays, e.g. in the project 'Road to employment after coal'.

Low quality of payment applications submitted



Applications often require multiple supplements and explanations, which prolongs the process of their consideration.

Problems with the verification of public procurement



Beneficiaries have difficulties in correctly applying the provisions of the Public Procurement Law, which results in errors and delays. In addition, the implementing authorities verify each contract, which is time-consuming.

How does the Just Transition Fund work?

Time-consuming changes to projects



The changes requested by the beneficiaries require an analysis of the impact on the project objectives, strategic evaluation and scoring, which involves MA/IB resources and prolongs the decision-making process.



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## Mitigation measures taken by implementing authorities



1

Intensive activities of Managing Authorities and Intermediate Bodies related to the organization of calls from 2023 onwards (quick 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 funding (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 best quality projects.



5

Modifications of the competition criteria/regulations for newly announced competitions in response to difficulties reported by beneficiaries observed 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:

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## Barriers to JTF implementation

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 breakdown by NUTS 2)

4

Inability to raise funds to ensure own contribution for the project

5

Limitation of support for mining plants planning transformation and rebranding

6

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

7

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

8

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

9

Definition and interpretation problems

10

State aid regulations

11

2024 flood

12

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## Recommendations for the on-going implementation of the JTF

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

1

Delays in the launch of the JTF and the pace of spending funds from the Next Generation EU are a threat to the full use of funds. It is recommended to negotiate an extension of the eligibility period, increased flexibility of certification and transfers of allocations with the EC.

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

2

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

Shortening the evaluation time and improving IT systems

3

Lengthy evaluation and contracting procedures delay the implementation of projects and discourage beneficiaries. It is recommended to simplify verification, automate processes and provide on-going information about the status of a project.

Introducing advances or special lines of support for own contributions

4

Own contribution is a barrier for many non-governmental organizations and local government units. 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.

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

5

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

Allowing, where justified, investments in fossil fuel equipment

6

The ban on support for fossil fuel-based technologies under the JTF causes implementation difficulties and limits the implementation of many investments. It is recommended to provide support in justified cases.

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## Recommendations for the on-going implementation of the JTF

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

7

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 flexibility of the support offer and strengthen the information and advisory component.

Transparent information policy in the transition process

8

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

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 adapt activities to the needs of these groups, redirect funds and increase the availability and visibility of social support.

Amending regulations to allow 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 practice between regions

11

A non-uniform approach to call documents makes it difficult to apply and leads to inequalities in 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 for the transition, so they should be continued and developed. It is recommended, among other things, to increase expenditure and use local communication channels.

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## Recommendations for the future of the JTF

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

1

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.

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

2

As a dedicated instrument, the JTF allows for precise adjustment of interventions to local needs and combining various forms of support within one project. Maintaining distinctiveness is key to maintaining flexibility, thematic concentration and the subsidy nature that meets the capabilities of local entities.

Individual TPSTs for each Polish coal region, including transformation strategies

3

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.

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

4

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).

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

5

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.

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## Recommendations for the future of the JTF

Amending laws to allow transferring land for economic purposes

6

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

Support for state 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.

Adaptation of 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 structuring 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.

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## Recommendations for the future of the JTF

Transition projects of a supra-regional nature

11

The current system of implementing the JTF prevents the implementation of projects with a supra-regional reach. 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 involvement 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.

Creation of 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, support cooperation, give access to interpretations, document templates and good practices.

Developing uniform definitions and standards at the 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.