

Ensuring a Socially Just Building Decarbonisation

An assessment of Poland's Social Climate Plan



Federal Ministry
for the Environment, Climate Action,
Nature Conservation and Nuclear Safety



European
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Contents

Executive summary	4
1. Introduction	6
2. Identification of vulnerable households and worst-performing buildings	9
3. Assessment of measures and investments	12
4. Governance	16
5. Synergies with other strategic documents	19
6. Public consultation and representation	20
7. Financing	22
8. Conclusions	24
9. References	26



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Executive summary

Poland's Social Climate Plan (SCP) is a key instrument for addressing the social impacts associated with the introduction of the EU Emissions Trading System for buildings and road transport (ETS2). The plan aims to support vulnerable households, microenterprises and transport users through structural investments and temporary income support.

Poland faces significant challenges related to energy poverty, the poor energy performance of its building stock and continued dependence on fossil fuels for heating. Approximately 1.5 million households, or around 12% of Polish households, are estimated to experience energy poverty. These households are particularly exposed to higher heating costs due to the combined effects of low incomes, high energy expenditure and inefficient housing. Effective use of the Social Climate Fund is therefore essential to ensure that ETS2 does not deepen existing inequalities and that vulnerable households can benefit from building renovation and clean heating.

Component C1 of the SCP includes eight investments for the buildings sector with an estimated total cost of approximately €5.95 billion. The measures support the renovation of single-family homes, municipal and social housing and buildings used by vulnerable microenterprises; the replacement of inefficient fossil fuel-based heating systems; the deployment of renewable energy and storage; and the development of energy communities. The component also includes training for social welfare staff and the expansion of local energy and climate advisory services.



Overall, the proposed package is broad and relevant, combining renovation, heating decarbonisation, affordable housing, advisory support and capacity building. However, several elements require further clarification.

- More than half of the buildings-sector budget is allocated to the established Clean Air Programme, which supports renovation and heat-source replacement only in single-family homes. Building on an existing programme may facilitate implementation and provide continuity with current renovation policies.
- The draft does not establish a clear methodology for identifying vulnerable households, although households affected by energy poverty are expected to be prioritised. Similarly, worst-performing buildings are not clearly defined, and no common energy-performance threshold or identification method is provided.
- The concentration of funding on single-family buildings also raises concerns. While these buildings account for a significant share of energy-poor households, around half of Poland's population lives in multi-family buildings, including many low-income residents of municipal and social housing. The available support for this segment may therefore be insufficient to address its renovation needs at the required scale.
- The plan sets out institutional responsibilities, milestones and targets, but some remain insufficiently detailed or lack clear implementation timelines. Delivery will involve several national, regional and local institutions, making effective coordination essential. Municipalities and local energy advisers are expected to play an important role in identifying needs, engaging residents and implementing investments.

Overall, Component C1 provides a solid basis for supporting a socially just decarbonisation of Poland's building stock. Clearer targeting of vulnerable households and worst-performing buildings, stronger support for multi-family housing, more precise monitoring indicators and better-defined coordination mechanisms would improve its implementation readiness and increase the likelihood that the available resources reach those most in need.



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1. Introduction

The Social Climate Fund (SCF), established by [Regulation \(EU\) 2023/955](#), is an EU funding instrument designed to address the social and distributional impacts associated with the introduction of the Emissions Trading System for buildings, road transport and additional sectors ([ETS2](#)). The fund aims to support vulnerable households, vulnerable microenterprises and vulnerable transport users, particularly those affected by energy or transport poverty, and to ensure that they can participate in and benefit from the transition towards a climate-neutral economy.

The SCF supports measures and investments that reduce dependence on fossil fuels and provide longer-term protection against rising energy and mobility costs. Eligible interventions may include building renovation and energy-efficiency improvements, the decarbonisation of heating and cooling, the deployment of renewable energy in buildings, and improved access to affordable low- and zero-emission mobility and transport. Member States may also provide targeted temporary direct income support, provided that it complements structural measures and investments addressing the underlying causes of vulnerability.

To access the fund, each Member State is required to prepare a Social Climate Plan (SCP) setting out its national approach for the 2026–2032 period. The plans, which were due to be submitted to the European Commission by 30 June 2025, should identify the vulnerable groups and territories expected to be most affected by ETS2, assess the anticipated social and distributional impacts, and define the measures and investments through which these impacts will be addressed. They should also set out the associated costs, milestones and targets, monitoring arrangements and stakeholder consultation processes. Social Climate Plans therefore serve both as strategic frameworks for national action and as implementation tools for ensuring that SCF support is targeted, coherent and socially effective.



In Poland, it is estimated that approximately 1.5 million households are affected by energy poverty [1]. In the buildings sector, three main factors are identified as causes of energy poverty: high energy costs, low incomes, and the inadequate technical condition of buildings. On average, energy expenses account for 13% of income in Poland [1]. Households affected by energy poverty spend an average of 30% of their income on heating and lighting their homes [1]. The implementation of ETS2 is expected to result in an increase in transportation costs (both public and individual), as well as higher heating costs. Figure 1 presents the predicted increase in prices (PLN/resident) depending on the cost of an emission permit (EUR).

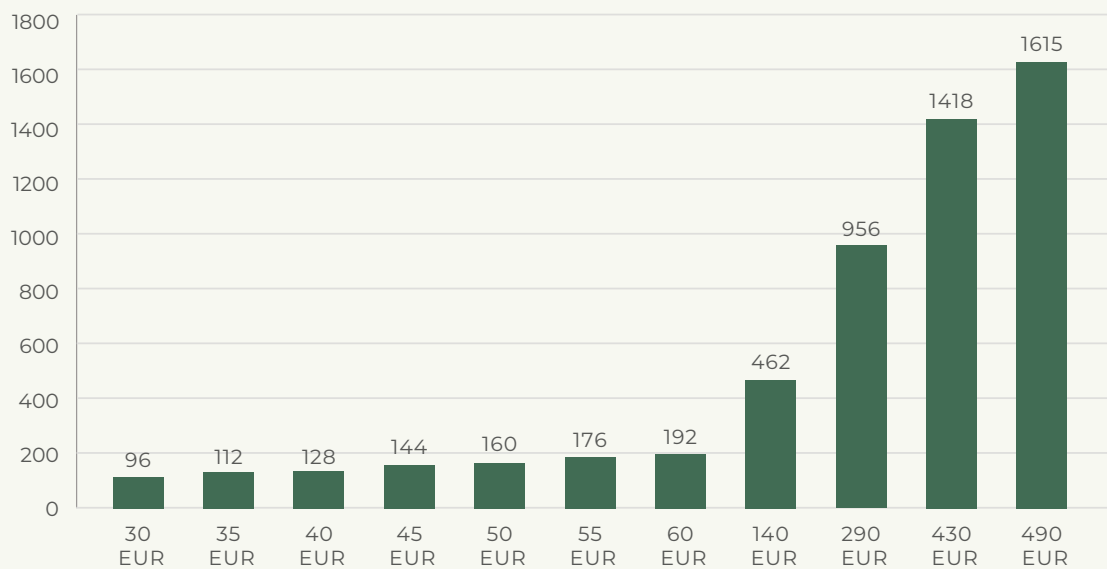


Figure 1: The increase in the average annual fuel cost [PLN/resident] at a given price in EUR per emission permit. Based on data obtained from KOBiZE, ITS, CEPIK and GUS – compiled by P. Rosik [1].

The implementation of ETS2 will also affect the costs of fossil-fuel-based heating. Currently, both the electricity grid and many district heating systems in Poland rely on fossil fuels, not to mention the existing individual heating solutions in many buildings (e.g., coal- or natural gas-fired boilers). The price increase will hit vulnerable consumers the hardest; many may have difficulty covering the costs of such basic needs as heating their homes. Figure 2 illustrates the share of heating costs for natural gas and coal in the income of an average household for each income decile in 2022. Four scenarios are presented: both with and without the impact of ETS2.

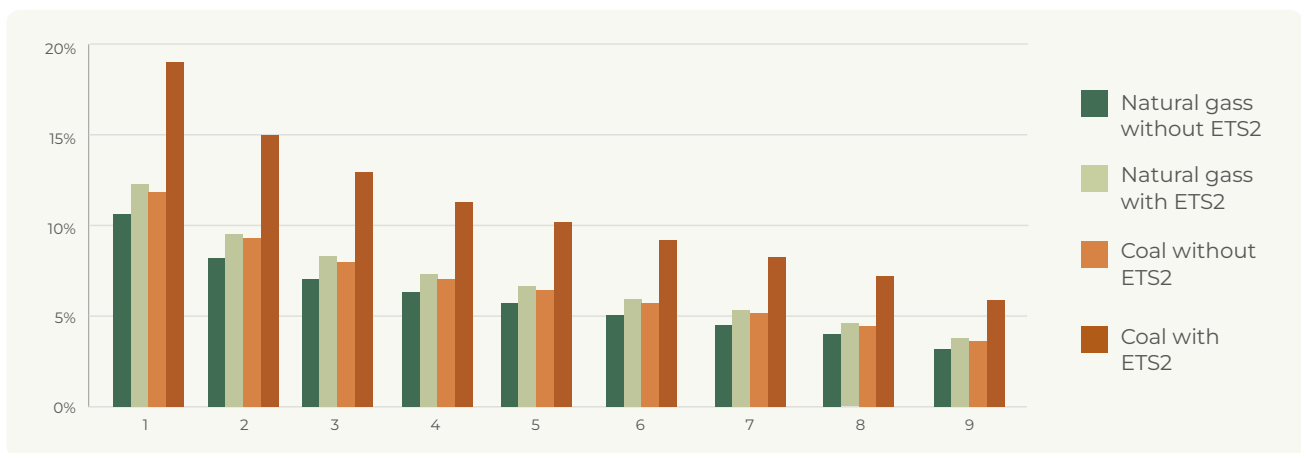


Figure 2: Share of heating costs for natural gas and coal in the income of an average household for each income decile in 2022, in scenarios with and without additional ETS2 costs (€55/t). Compiled by the Institute for Reforms Foundation based on Eurostat data [1].

Proper management of resources from the SCF should both help reduce energy poverty in Poland and decrease the distributional impact of ETS2 on buildings. The support provided by SCF is crucial as nearly 40% of residential buildings in Poland were built before 1970 and rely heavily on coal or gas [2].

The Social Climate Plan for Poland distinguishes four main components:

- C1** – Buildings sector
- C2** – Transportation sector
- C3** – Direct income support
- C4** – Technical assistance.

Poland is set to be the largest beneficiary of the Social and Climate Fund in the EU – estimates put the figure at over €11 billion. According to the provisions of the Social Climate Plan, almost €4.5 billion (without national contribution) will be allocated to the buildings sector. The effective use of these funds will have a significant impact on the sector.

The key areas of support identified in the SCP related to the **buildings sector** are:

- Replacement of heating systems and improvement of energy efficiency in single-family residential buildings, including advisory support
- Renovation of buildings used for the business activities of microenterprises (renovation, replacement of heating systems)
- Support for energy communities
- Financial support to cover household energy and heating costs
- Technical assistance to help institutions involved in the implementation of the Energy Transition Plan achieve the plan's objectives.



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2. Identification of vulnerable households and worst-performing buildings

Vulnerable households identification methodology is not directly described in the SCP draft for Poland. It is stated that vulnerable households should be beneficiaries of the SCF, but they are not clearly defined. The draft does, however, mention the correlation between vulnerable consumers and energy poverty, so it may be assumed that households affected by energy poverty are classified as vulnerable households.

Worst-performing buildings are listed as areas for intervention but not clearly defined in the SCP draft. Reducing non-renewable primary energy demand is mentioned as the objective of the investments within the buildings sector. However, the document does not specify a threshold or limit value for non-renewable primary energy demand for buildings with the worst energy performance. Another potential way to define worst-performing buildings is to define a minimum energy efficiency class; however, this classification system has not yet been implemented in Poland. The type of heat source is another important aspect – buildings using fossil fuels can be described as worst-performing buildings, though it is important to assess system efficiency as well as heat source type. Residing in a building with a fossil-fuel-based, individual or local heating system has been proposed in the SCP as a criterion for direct financial support (C3 Direct income support). We recommend that the assessment of whether a particular building is classified as a WPB should preferably be based on the building's energy performance certificate. However, the SCP does not directly specify any threshold values for the building's energy demand indicators, or any other criteria describing a WPB.

Energy poverty is interpreted on a national level in line with the definition set out by the EU in [Energy Efficiency Directive \(2023/1791\)](#). Under Polish law, energy poverty is defined in Article 5 of the Energy Law [3]. It refers to a situation in which a *household run by a single person or by several people jointly in a self-contained dwelling or a single-family residential building is unable to secure a sufficient level of heating, cooling and electricity to power appliances and provide lighting.*

A household affected by energy poverty meets the following conditions: it has low income, incurs high energy expenditure, and resides in a dwelling or building with low energy efficiency.

The SCF mentions different indicators for energy poverty in the buildings sector but does not introduce any specific methodology to compare them (e.g. weighted average). In Poland, the following six indicators are used to measure the level of energy poverty (they can be used alone or together):

- Low income and high costs
- Double the median expenditure
- (In)ability to pay bills on time
- A building with a leaking roof
- Insufficient thermal comfort
- Age.

One of the most used is the low income high costs (LIHC) indicator. Based on this alone, energy poverty affects ~12% of the Polish population (1.5 million households). One of the key advantages of this indicator is the ability to estimate both the scale and the severity of energy poverty.

The eligibility criteria for receiving direct support, in accordance with the definition of energy poverty set out in the Energy Act and taking into account the specific characteristics of different household groups, are set out in the section C3 Direct income support. Given the specific characteristics of energy-poor households, the criteria used to identify the target group for direct support were age, in conjunction with income, and living in a building with a fossil fuel-based individual or local heating source. Direct income support will be provided to people of retirement age (60 for women and 65 for men).

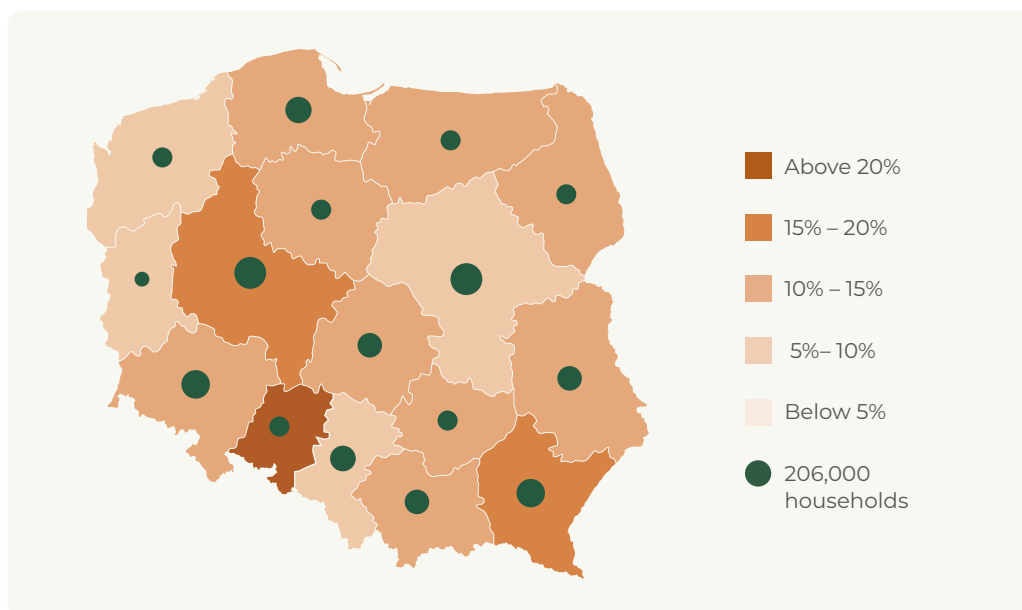


Figure 3: Map of energy poverty risk based on the LIHC indicator (% of households affected by energy poverty). SCP draft – based on the results of the 2022 Household Budget Survey, compiled by IBS [1],[4]

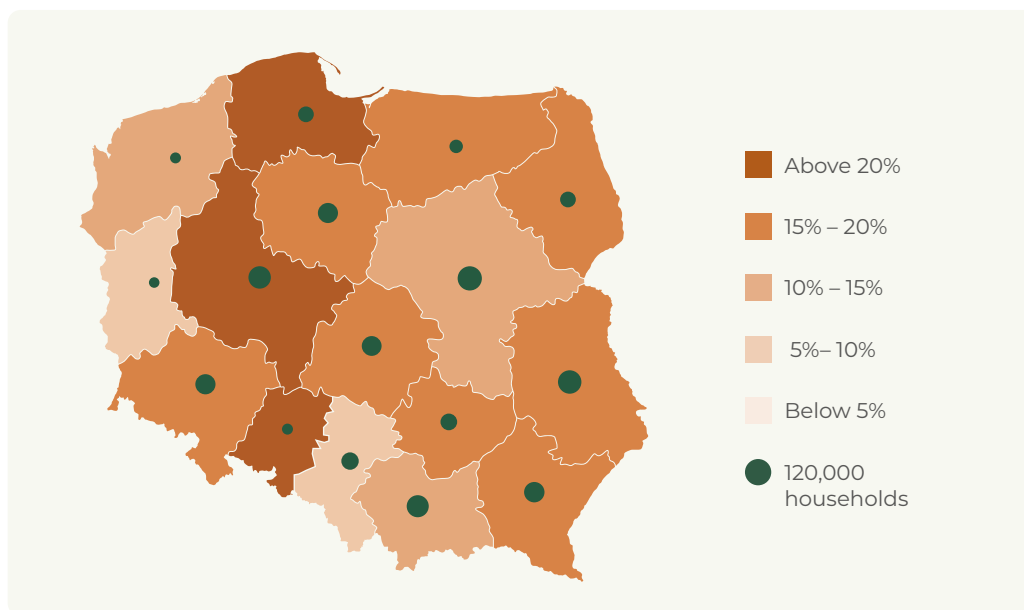


Figure 4. Map of energy poverty risk based on the LIHC indicator for single-family buildings (% of households affected by energy poverty). SCP draft – based on the results of the 2022 Household Budget Survey, compiled by IBS [1],[4]

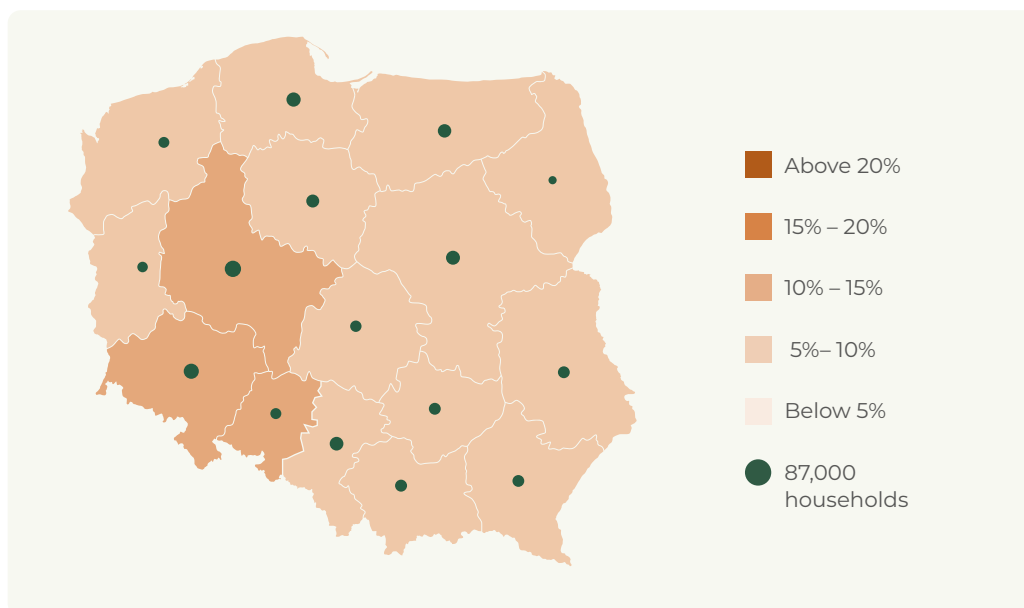


Figure 5: Map of energy poverty risk based on the LIHC indicator for multi-family buildings (% of households affected by energy poverty). SCP draft – based on the results of the 2022 Household Budget Survey, compiled by IBS [1],[4]

According to LIHC indicator results presented on Figures 3-5, single-family houses are more significantly affected by energy poverty than multi-family buildings. Voivodeships with the largest percentage of households affected by energy poverty are Greater Poland, Opole, Pomerania and Lower Silesia.



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3. Assessment of measures and investments

Component C1 is dedicated to the buildings sector and includes eight major investments:

- I1** Clean Air Priority Programme¹
- I2** Social and Municipal Housing Programme
- I3** Microenterprise Support Programme – energy efficiency in buildings
- I4** Supported and Training Housing Programme
- I5** Programme ‘Training for Social Welfare Centre staff on support for the energy-poor’
- I6** Investments under the regional component – supporting building renovation
- I7** Investments under the regional component – educational activities and energy/ climate advice as part of support for a network of climate advisers employed by local government units
- I8** Pilot Programme – Energy Communities

All eight investments are described in more detail in Table 1.

1. The Clean Air Programme is a financial subsidy programme in Poland focused on improving air quality and energy efficiency in buildings by replacing inefficient heat sources and retrofitting homes. It was first introduced in September 2018. The ongoing fifth edition of the Clean Air Programme began in March 2025. The programme has a tangible impact on improving the quality of life in Polish households. The total subsidy awarded between September 2018 and April 2025 amounted to almost 22 billion PLN.

**Table 1:** Overview of the investment included in the Romanian Social Climate Plan

Investment	Planned measures	Target group (who can apply for funding)
Investment I1	Supports the replacement of high-emission solid-fuel boilers with new, more efficient, and less environmentally harmful heat sources, as well as comprehensive renovation. The programme is aimed at owners and co-owners of single-family homes or residential units within single-family buildings that have a separate land and mortgage register.	Private individuals
Investment I2	Supports the creation of residential units as part of the municipality's housing stock, as well as the municipality's or an intermunicipal association's participation in projects by other investors aimed at creating affordable rental housing. Projects will create low-carbon, multi-family residential buildings or housing units intended for people with limited incomes.	Municipalities
Investment I3	A new initiative targeting microenterprises facing difficulties that will provide support for the renovation of buildings used for business operations. The scope includes all types of renovations aimed at improving the energy performance of buildings, such as the insulation of exterior walls and the installation of building services systems. Ultimately, the energy efficiency of buildings will be improved, and the replacement of high-emission heating or cooling sources using fossil fuels with zero-emission or low-emission sources will protect against the effects of rising fuel prices during the next phase of the energy transition.	Microenterprises
Investment I4	A pilot initiative that introduces a comprehensive approach to creating supported and transitional housing, while ensuring a high standard of energy efficiency. This solution complements existing housing pro-grammes (including those implemented by the Ministry of Development and Technology), filling a gap in ensuring an adequate housing base for the provision of essential social services – including long-term care services – for those most at risk of social exclusion, including from deepening energy poverty.	Local government authorities
Investment I5	Training sessions for social welfare agency staff will highlight the challenges associated with the climate and energy transition, and familiarize staff with the types of assistance available under the SCP to individuals at risk of energy poverty. The plan is to train employees of all social welfare institutions in Poland who have direct contact with individuals applying for assistance from the social welfare system –primarily social welfare centres, county family assistance centres and social services centres.	Social welfare agencies

Table 1 cont.: Overview of the investment included in the Romanian Social Climate Plan

Investment I6	Supports the renovation of buildings in which social and municipal dwellings are located through a range of measures aimed at reducing the building's thermal energy demand and lowering its carbon footprint. These include renovation of buildings; replacement of heating or cooling systems; installation of renewable energy systems along with energy storage facilities; other measures aimed at improving the energy performance of buildings.	Municipalities
Investment I7	Depending on the region, includes hiring and funding eco-advisors, establishing energy advisory centres and related activities to raise awareness, provide education and counselling on the low-carbon economy, energy savings, circular economy and renewable energy. Advisors will support local governments in engaging with residents, addressing local needs and assessing how various educational initiatives are received by the community.	Municipalities
Investment I8	A nationwide pilot programme aimed at local government entities. The ultimate beneficiaries of the support will be households in difficult circumstances. The projects funded under this initiative will ensure energy security for residents in line with the socioeconomic objectives set for the SCP. They include building renovation (including decarbonisation), renewable energy generation and storage, and educational activities, which will ultimately result in lower costs for heating, cooling and meal preparation in buildings.	Local government authorities

The proposed investments include a range of measures that contribute to reducing emissions and energy poverty. These include financial support for building retrofits, training on energy efficiency and renewable energy sources, and pilot programmes (e.g., the concept of energy communities). Investments cover both new initiatives and well-established solutions that will be implemented on a larger scale, such as the Clean Air Programme (Investment I1) – most of the funding will be allocated specifically to this programme.

Overall, the proposed investment approach is well designed, with a broad and relevant scope of measures that responds to key needs. The main concern is that investments seem to be focused primarily on single-family dwellings, while multi-family dwellings still require significant attention and funding. Given that most existing financial support schemes, such as the Stop Smog and Clean Air programmes, are primarily targeted at single-family buildings, the SCP could have been expected to place stronger emphasis on multi-family buildings. However, this gap does not appear to have been sufficiently addressed. This raises the question of whether the funds allocated to other initiatives will be sufficient to bring about significant change and help a wider group of vulnerable people and households.



In addition to investments directly related to buildings, direct income support is provided under Component C3. In order to minimise the negative economic and social consequences of electricity price rises for households, national protective measures are being systematically introduced. One of these is an energy voucher. Unlike a tariff or supplier subsidy, this does not distort the market, does not support heating companies, power stations or fuel distributors, and does not reduce the pressure to modernise infrastructure. The beneficiaries are exclusively households in difficult circumstances, and the mechanism does not provide for the involvement of other public or private entities that would derive financial benefits from it.

Overall, the main strength of the plan is its multidisciplinary nature, covering buildings, transport and microenterprises. With regard to the buildings sector, the Ministry notes that renovation is key, including support through the Clean Air Programme: *“PLN 10 billion has been secured from the Modernisation Fund for the implementation of the Clean Air Priority Programme. The inclusion of SCP funding will enable further calls for proposals under the Clean Air Priority Programme to continue up to 2032.”* Another component, meanwhile, provides for the development of social policy, including through support for social and municipal housing, which for some sections of society could provide a lasting solution to the problem of energy poverty.

However, the plan has several shortcomings that need to be addressed before the final version is submitted to the European Commission.

Additional measures are needed in the area of technical assistance, including the development of a strategy to combat energy poverty. The establishment of a national Energy Poverty Observatory could prove helpful in this regard; it would collect data, assess progress in implementing the SCP, and assist in designing and implementing long-term policies. Local authorities, which have the most knowledge in this area, should play a greater role. For example, social welfare centres are local authority institutions providing social assistance, operating in every municipality (in an urban municipality, this is the municipal social welfare centre, while in a rural municipality it is the local authority social welfare centre). They have knowledge of which households receive social assistance and can help to identify and verify those experiencing energy poverty.

The additional age criterion for direct support (Component 3) to households particularly vulnerable to high energy costs raises significant concerns. This provision restricts support solely to those of retirement age. There is a risk of excluding many households in need, such as couples with many children.

The document lacks a clear definition for worst-performing buildings. This may lead to differences in how this issue is addressed across various support schemes. Also, little attention has been paid to multi-family buildings, which are home to around half of Poland's population. This applies in particular to council housing and buildings managed by residents' associations. Many of these are occupied by people living in poverty, and the current support schemes for renovation are limited.

Finally, there are significant shortcomings in the document's communication strategy. The Ministry has made no provision for publicising the Social Climate Plan or highlighting the benefits of building renovation.



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4. Governance

The main targets of measures and investments of the SCP for buildings include:

- Reducing the number of households affected by energy poverty
- Reducing CO2 emissions from residential buildings
- Mitigating the impact of the introduction of ETS2 in terms of the costs incurred for fuel for heating in the operations of microenterprises and reducing CO2 emissions from commercial buildings.

The milestones and targets for the eight major investments in the buildings sector are presented in the tables below. The milestones identified relate mainly to announcing calls for proposals for ongoing projects, signing contracts, awarding tenders and publishing documents setting out the guidelines for individual programmes.

Table 2: Milestones for investments which are part of the Component C1

Investment	Milestone	Timeline
I1	Call for applications for investment projects	Q2 2026
I2	Publication of a document setting out the mechanism for allocating support and the total amount of support ear-marked for subsidising energy-efficient flats under the call for applications	Q1 2027
I3	Preparation of tender documentation for support for microenterprises in the field of energy efficiency in buildings	Q2 2026
I4	Publication of a document setting out the mechanism for allocating support and the total amount of support ear-marked for subsidising the creation of energy-efficient supported housing, training flats, supported accommodation and the Social Rental Agency as part of the call for applications	Q1 2027
I5	Selection, through a competitive tender process, of an organisation to deliver training for social care staff on support for people in energy poverty	Q4 2026

**Table 2 cont.:** Milestones for investments which are part of the Component C1

I6	Call for applications as part of the investment project	Q3 2027
	Signing of support agreements	Q3 2028
I7	Call for applications as part of the investment project	Q3 2027
	Signing of support agreements	Q3 2028
I8	Announcement of the first call for proposals under the investment project	Q3 2026

Table 3: Targets for investments which are part of the Component C1

Investment	Milestone	Timeline
I1	90,720 heat sources replaced in single-family homes	Q4 2029
	129,600 heat sources replaced in single-family homes	Q2 2032
	98,280 single-family homes to undergo renovation	Q4 2029
	140,400 single-family homes to undergo renovation	Q2 2032
I2	A decrease in the proportion of households waiting for council housing	n/a
	Reduction in the number of vulnerable households	n/a
I3	Identification of the number of microenterprises in difficulty that have benefited from at least one measure to reduce their emissions in the buildings sector	n/a
I4	Creation of supported and assisted housing units	n/a
I5	Social welfare staff trained in services for people in energy poverty, as part of basic training – first part	Q2 2028
	Social welfare staff trained in services for people in energy poverty, as part of basic training – second part	Q4 2029
	Social welfare staff trained in services for people in energy poverty, as part of basic and supplementary training – third part	Q4 2031
I6	Based on the average cost of producing one unit of the indicator under regional programmes. Unit costs may vary from region to region.	n/a
I7	A quantitative indicator measuring progress in recruiting energy advisers within public administration bodies, monitored on a cumulative basis over the duration of the plan. The unit of measurement is the number of staff employed to carry out, among other things, advisory tasks relating to energy efficiency.	Q4 2029 (81 people) Q3 2032 (162 people)
I8	Support for energy community projects in 80 local authorities	Q2 2032



As can be observed, not all milestones and targets have a clear implementation timeline assigned. In some cases, the proposed timeline has to be adjusted as the milestone's implementation is already not possible within the deadline – e.g. Investment II milestone with the timeline of Q2 2026.

The process of monitoring and implementing the plan is highly complex and involves a significant number of institutions. It has complicated institutional architecture, with many actors and responsibilities.

Monitoring and implementation of measures and investments is entrusted to the minister responsible for regional development. The tasks of the audit authority are to be performed by the head of the National Revenue Administration, who is supervised by the minister responsible for finance. The Ministry of Funds and Regional Policy is responsible for verifying the achievement of milestones, targets and related indicators. The monitoring of funds and investments, including milestones, will be based on data submitted to the managing authority by intermediate bodies on a quarterly basis via the ICT system operated and maintained by the Ministry of Finance and Public Administration. The data provided by beneficiaries will be verified during audits carried out by the funding bodies. These audits will involve on-site checks of the actual situation and verification of documents (e.g. expenditure confirmations, commissioned works acceptance and completion).

Within such a structure, effective implementation of the plan may be complicated, and effective exchange of information may be limited. This applies, for example, to the criteria adopted for defining energy-poor households or buildings with the worst energy performance. An excessive focus on achieving the set targets may limit the plan's effectiveness.

To ensure effective implementation of measures and investments, and to maintain the involvement of institutions that prepared the SCP, a monitoring and implementation group will act as an advisory and consultative body supporting the SCP managing authority. Tasks of the SCP monitoring and implementation group will include providing recommendations and feedback at national and local levels, and ensuring that activities comply with cross-cutting principles (DNSH, equality, non-discrimination, accessibility). The group will comprise representatives of the managing authority, intermediary and implementing bodies, civil society partners, social and economic partners, scientific/academic community partners, and central and local government who are not part of the institutional system.

Local authorities will play a key role in implementing the plan and are responsible for employing energy advisers. The target figure of 162 energy advisers is based primarily on an analysis of the varying regional demand for energy advice within the local government units of individual provinces where the risk of energy poverty has been identified. The advisers will support local authorities in engaging with residents, being highly mobile and analysing residents' responses to various types of educational campaigns.

Programmes include support for investments that contribute to improving energy efficiency in buildings owned by municipalities containing council and social housing. Support will also be allocated to the construction of housing for people on lower incomes or facing difficult life circumstances.

Unfortunately, no attempt has been made to revive the 'Stop Smog' programme, which was designed for local authorities and was intended to assist with the thermal renovation of single-family homes occupied by people living in energy poverty.



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5. Synergies with other strategic documents

The SCP draft was prepared in a way that ensures consistency with other plans and funds:

- **National Recovery and Resilience Plan (Krajowy Plan Odbudowy i Zwiększenia Odporności – KPO)**

Investments funded by the KPO provide support for society as a whole. The SCP is designed not to duplicate these measures but to complement them, creating a top-up mechanism (covering up to 100% of costs) specifically for the most vulnerable households.

- **National Energy and Climate Plan (NECP)**

The NECP sets out targets for emissions and energy poverty reduction, the development of renewable energy sources and energy efficiency in general. The objectives of the NECP and the SCP are in line with one another – NECP assumes the withdrawal of fossil fuels from domestic heating and a reduction in transport-related emissions. The SCP is intended to mitigate the risk that the NECP might lead to an increase in poverty. For instance, Investment II from the SCP contributes to NECP's objectives by providing financial support for the replacement of fossil fuel boilers in single-family buildings.

- **National Building Renovation Plan (NBRP)**

The NBRP identifies worst-performing buildings and defines 'deep' energy renovation. The SCF is supposed to be primarily aimed at vulnerable households and people affected by energy poverty, many of whom live in the worst-performing buildings. It should ensure that the budget from the SCF is allocated first and foremost to the investments that are most urgent.

- **Local Heating and Cooling Plan (LHCP)**

The LHCP focuses on the transformation of heating systems – both large-scale district heating and local systems. It defines areas and municipalities that will be supplied by efficient district heating systems and those that must rely on individual solutions such as heat pumps. This should inform the allocation of financial subsidies from the SCF.



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6. Public consultation and representation

Public consultation on the draft of the Social Climate Plan took place from 6–30 June 2025. As a result of the consultation, two documents were published in September 2025:

- Report on the public consultation on the SCP
- Summary of comments received on the SCP draft.

A total of 583 comments were submitted. The comments were categorised into seven topic areas:

- Overview and development process of the SCP (28.6%)
- Buildings sector (33.1%)
- Transportation sector (19.7%)
- Direct income support (9.6%)
- Technical assistance (1%)
- Analysis and overall impact (2.5%)
- Complementarity, additionality and implementation of the plan (5.5%).

In total, 74 stakeholders submitted comments to the SCP draft during the public consultation. Among these stakeholders were NGOs and associations, central and local government bodies, chambers of commerce and trade organisations, employers' associations, and private individuals. Most comments were submitted by NGOs (48.9%) and local government bodies (33.2%).



The Institute for Reforms Foundation (Fundacja Instytut Reform) submitted the most comments (98), followed by the City of Warsaw, Office for Air Quality and Climate Policy (Urząd m.st. Warszawy, Biuro Ochrony Powietrza i Polityki Klimatycznej) with 68 comments and Wrocław City Council (Urząd Miejski Wrocławia) with 34.

The submitted comments related to the buildings sector were focused mainly on insufficient financial support for multi-family buildings. Stakeholders pointed out that proposed investments are focused on single-family buildings, and multi-family ones are neglected – e.g. Investment I1 which accounts for the largest share of the C1 budget is intended only for single-family buildings. In addition, comments mentioned that the type of support described is not defined in detail, particularly in the case of housing communities, which makes it difficult to draw up a feasible renovation plan. For example, there is a concern that buildings which require retrofit but are located in municipalities with a higher average income will not be eligible for the subsidy. Doubts were also raised around energy communities – who they apply to, how they operate, who benefits, and so on. For instance, it was not clear whether a housing association that owns both private and communal flats would be eligible to receive financial support.

Each comment submitted during public consultation was assigned one of four statuses: accepted, partially accepted, rejected or clarified. Summary of comments received on the SCP draft contains a table with all 583 comments, their status and clarification of the assigned status: 92 comments were accepted, 22 partially accepted, 151 rejected and 317 clarified.



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7. Financing

The estimated costs of the four main components in the SCP – buildings sector, transportation sector, direct income support and technical assistance – are presented below.

Table 4: Estimated cost distribution for each SCP component for Poland

Component	Estimated total costs	Cost to be covered by SCF funding	National contribution to the total costs	Funding from other EU instruments	Private funding
C1 Buildings sector 	€5,948,293,755	€4,461,220,314 (75% of total costs)	€1,487,073,441 (25% of total costs)	Potential additional support from other instruments, such as FEnIKS, KPO, EFRR, ESF+*	Potential additional support from private funds in the form of a loan (refers only to the Clean Air Programme)
C2 Transportation sector 	€3,202,927,408	€2,402,195,554 (75% of total costs)	€800,731,854 (25% of total costs)	n/a	n/a
C3 Direct income support 	€5,719,513,223	€4,289,634,917 (75% of total costs)	€1,429,878,306 (25% of total costs)	n/a	n/a
C4 Technical assistance 	€381,300,882	€285,975,661 (75% of total costs)	€95,325,221 (25% of total costs)	Potential additional support from other instruments, such as the Technical Support Instrument	n/a

* FEnIKS (The European Funds for Infrastructure, Climate and Environment – Fundusze Europejskie na Infrastrukturę, Klimat, Środowisko), KPO (National Recovery and Resilience Plan – Krajowy Plan Odbudowy i Zwiększenia Odporności), EFRR (European Regional Development Fund), ESF+ (European Social Fund Plus)



The estimated total cost of component C1 for buildings is €5,948,293,755. As mentioned in the SCF Regulation, 75% of that amount will be covered by the SCF and 25% by national contribution.

The percentage allocation of funds for component C1 across the individual investments is presented below:

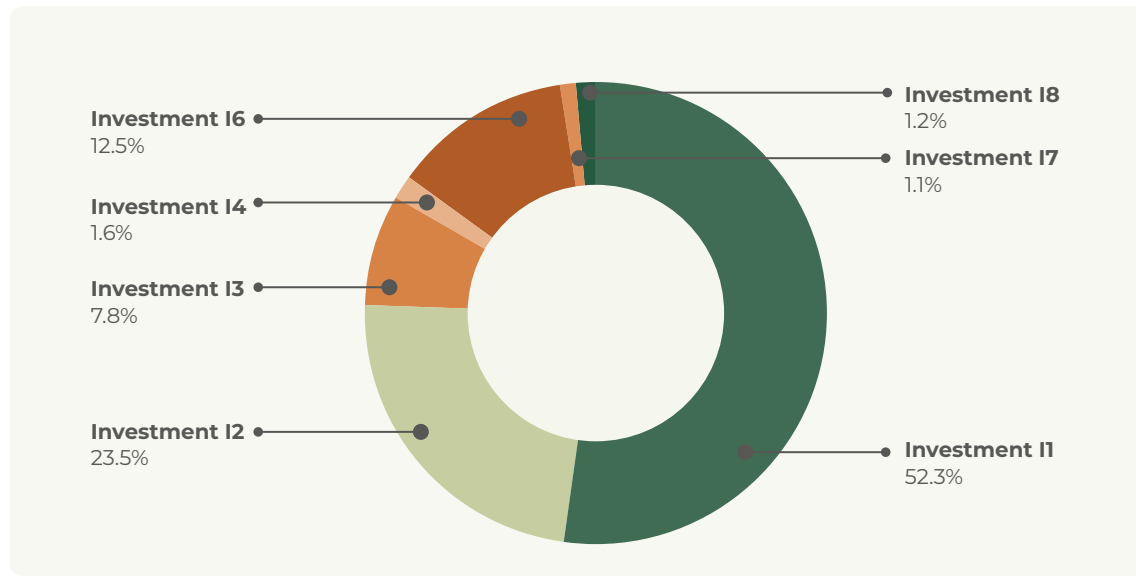


Figure 6: Allocation of funds for component C1 – Buildings sector.

More than half of the funds (52.3%) allocated to component C1 are to be spent on the Clean Air Programme (Investment I1), which has been identified as the top priority. A significant amount of funding is also intended for Investment I2, the Social and Municipal Housing Programme (23.5%), and Investment I6, Investments under the regional component – supporting building renovation (12.5%).



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8. Conclusions

Investments proposed within the buildings sector (Component C1) provide a well-structured framework to reduce emissions and tackle energy poverty through retrofits, energy efficiency educational initiatives and pilot programmes. The main pillar of these measures is the well-established Clean Air Programme, which will receive the vast majority of funding and has secured PLN 10 billion from the Modernisation Fund to extend the call for proposals until 2032. However, this plan is largely focused on single-family houses, which raises serious concerns as to whether the remaining funds will be sufficient to bring about significant changes for a broader and more diverse section of society.

The focus on single-family dwellings means that multi-family buildings – in which around half of Poland's population lives, including many low-income residents in council flats – are offered unattractive renovation schemes and receive only minimal support.

In addition to modernising buildings, this plan also addresses urgent financial difficulties through direct income support under Component C3, using energy vouchers that help low-income households without distorting the energy market. However, even this assistance is hampered by a restrictive retirement age criterion, which risks excluding other particularly vulnerable groups, such as low-income families with many children.

To make the C1 building initiatives truly effective before final submission to the European Commission, several critical gaps must be filled. The document currently lacks a clear definition for worst-performing buildings, which could cause highly inconsistent application across different subsidy schemes. Additionally, the plan needs to empower local authorities to better target building modernisation and strategically communicate the benefits of retrofits to the public.

Unfortunately, as of now (September 2026), the final version of the plan has not been published and has not been formally adopted by the Council of Ministers. Consequently, the national PSK has not been submitted to the European Commission.



Checklist

	Category	Assessment
Content	Identification of vulnerable households	Not included
	Identification of worst-performing building	Not included
	Information on how the definition of energy poverty is applied/operationalised at national level	Included
	Information on existing or planned financing of measures/investments	Included
	Measures and investments targeting VHH through:	
	building renovations	Included
	access to affordable energy-efficient housing, including social housing	Included
	electrification of heating and cooling	Included
	integration of renewable energy generation and storage, including through renewable energy communities and citizen energy communities	Partially included
	connection to efficient district heating systems	Partially included
	connection to smart grids	Partially included
	accessible and affordable information, education, awareness and advice on cost-effective measures and investments	Included
	available technical support for building renovations and energy efficiency	Included
	support for public and private entities, including social housing providers and public-private cooperatives in developing and providing affordable energy efficiency solutions and appropriate funding instruments	Included
	direct income support to vulnerable households	Included
Governance	Targets and milestones	Partially included
	Clear implementation timeline	Partially included
	Clear roles and responsibilities	Partially included
	Monitoring and implementation mechanisms	Partially included
Synergies with other strategic documents	Synergies with NECPs, LHCP, NBRPs	Included
Public consultation	Public consultation	Included
	Participation and representation of relevant stakeholders	Included
	Stakeholder feedback integration	Partially included
Financing	Total cost of the plan	Included
	National contribution to the plan	Included



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9. References

- [1] Social Climate Plan – Draft for public consultation – June 2025 (Plan Społeczno-Klimatyczny – Projekt do konsultacji publicznych – Czerwiec 2025 r.)
- [2] Energy efficiency of the building stock in the EU (<https://www.rics.org/news-insights/energy-efficiency-of-the-building-stock-in-the-eu>)
- [3] Journal of Laws 2024 Item 266 (Dziennik Ustaw z 2024 r. poz. 266)
- [4] Statistics Poland, Household Budget Survey 2022 (Budżety gospodarstw domowych w 2022 r.) (<https://stat.gov.pl/obszary-tematyczne/warunki-zycia/dochody-wydatki-i-warunki-zycia-ludnosci/budzety-gospodarstw-domowych-w-2022-roku,9,21.html>)

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