



Warsaw, Gdansk, 23 March 2023 r.

**Ms.
Roberta Metsola
President
of the European Parliament**

**Joint position of the FZZ, NSZZ “Solidarność”, OPZZ
towards the draft regulation on the reduction of methane emissions
in the energy sector and amending Regulation (EU) 2019/942**

As the Trade Unions Forum (FZZ), Independent and Self-Governing Trade Union “Solidarność” (NSZZ “Solidarność”), All-Poland Alliance of Trade Unions (OPZZ) - all representative trade unions in Poland, we would like to draw attention to the threats posed by the Regulation on Reducing Methane Emissions in the Energy Sector and Amending Regulation (EU) 2019/942. We call on Members of the European Parliament to amend the draft to give it a socially and economically acceptable shape for achieving climate neutrality.

In our opinion, introducing the so-called methane regulation in the form proposed by the Council of the European Union will be catastrophic for Poland's energy security and also a disaster for hundreds of thousands of workers in our country. The proposed standards limiting emissions are impossible for any coal mine in Poland to meet. The entry into force of provisions with limits of 5 and then 3 tonnes of methane per 1 000 tonnes of coal extraction will mean that most of the thermal coal mines will have to close as early as 2027, in less than four years. The limits proposed by the Council are therefore unacceptable.

The regulation will have negative influence on energy security of Poland. Instead of being extracted locally in the coming years, coal will have to be imported from outside the European Union, from countries not covered by the limits on methane emissions. It will increase the dependence of Poland and therefore of the EU, on energy resources from outside the EU. At the same time, it will not change the overall level of methane emissions.

The sudden end of coal extraction in Poland will bring about a social and economic collapse in the country's mining regions. The regulation as proposed, directly

and indirectly threatens more than 250 000 jobs. It will force the rapid, unplanned closure of mining plants and destroy the chance for a gradual transformation of Poland's energy sector. It will lead to numerous social problems, and make the whole European process towards a just transition look bad. A just transition cannot be based on violent and socially unacceptable solutions!

It should be noted that the Polish energy system is based on a model in which 75% of electricity production comes from coal, of which more than 50% is hard coal. The same applies to the heating sector - Poland's vast majority of heat energy comes from hard coal. The new legislation will cause a severe problem with providing raw materials to the domestic power industry, putting the possibility of its functioning, in general, under question. As a result, in a few years the residents of Poland may have serious problems to heat their homes, which will increase - already high - energy poverty.

We also point out that the draft regulation contradicts the Social Agreement signed by representatives of the Polish government with social partners in 2021, which provides for the gradual phasing out of thermal coal mines by 2049. Moreover, it is inconsistent with documents adopted by the Polish government, such as the "Energy Policy of Poland until 2040" and the "National Energy and Climate Plan for 2021-2030", which provide for the use of domestic coal as a critical fuel at least until other stable energy sources emerge.

The proposed law is expected to apply to the mines of coking coal, which is a key factor in steel production. These mines are not currently scheduled for closure because coking coal is on the EU list of critical raw materials, which was confirmed by the European Commission this month - 16 March 2023. As Poland is the only producer of coking coal in the EU, it is essential to maintain mining in our country as crucial for the raw material supply independence of the entire EU and the fulfilment of its own arrangements.

The FZZ, NSZZ "Solidarność", OPZZ express an unequivocally negative position on the draft methane regulation. The proceeding draft regulation poses severe threats to Polish society and the EU's energy independence. At the same time, it ignores national arrangements and the real possibilities for adjusting the fuel and energy sector. Therefore, the trade unions call on Members of the European Parliament to re-examine the proposed regulation's effects and take the trade unions' demands on board.

Dorota Gardias

President of the FZZ



Piotr Duda

President of the NSZZ

„Solidarność”



Piotr Ostrowski

President of the OPZZ

