

20 March 2023, Brussels

To:

**Frans Timmermans**

*Executive Vice-President*

European Commission

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## **Request for dialogue on trade union concerns about impact of proposed legislative files on Just Transition plan in Poland**

Dear Executive Vice-President Timmermans,

On behalf of industriAll European Trade Union and the ETUC, we would like to express our concern regarding the impact and interaction of various legislative acts on the process of a socially responsible phase-out of hard coal mining in Poland, notably the draft EU Methane Regulation and proposed amendments.

Today, Poland employs roughly 75,500 workers in the hard coal sector, which represents almost half of the employment in the coal mining sector in Europe. The jobs in the sector are generally based on strong collective agreements providing for high quality jobs and working conditions, more often better compared to other industrial employment. However, hard coal mining is concentrated in specific regions.

It is significant that the Polish trade unions in May 2021 concluded a social agreement with the Ministry of State Assets and the Polish Government on managing the phase-out of Polish coal mines in a socially responsible way by 2049. From now on, there is a clear timeline of shutting down coal mines and transferring affected workers to other mines that remain operational until their final phase-out in 2049. The social plan is an historic decision given the size and importance of the sector in Poland, ensuring progress in climate ambition while preventing a social crisis.

In that spirit, the three Polish trade union confederations affiliated to the ETUC and their respective sectoral trade unions affiliated to industriAll Europe, starting in Autumn 2020, engaged in a process of political dialogue with the different responsible directorates of the European Commission in good faith to achieve a Just Transition of their members. This process led to a decisive meeting between the European Commission's Executive Vice-President Frans Timmermans and the representatives of the three trade unions in Katowice on 4 December 2022 and the adoption of five Territorial Just Transition Plans (TJTP) in Poland. The adoption of the TJTPs is instrumental in proceeding with the Just Transition process in the Polish mining sector.

It is with great concern that we see legislative acts brought about that risk undermining this process and this creates huge uncertainty for workers and their families in hard-coal mining areas. It is of particular

concern that the proposed Regulation on methane emissions reduction in the energy sector and amending Regulation (EU) 2019/942 risks bringing about the abrupt closure of many hard coal mines in Poland within a few years from now. Furthermore, we are concerned that occupational health and safety has largely been ignored in the proposals, as the process of venting methane is used to prevent the risk of explosions in coal mines.

ETUC and industriAll Europe acknowledge and support the need for decisive action to reduce methane emissions, as the most devastating of greenhouse gases. Both the ETUC and industriAll Europe support the European Green Deal and its ambitious targets, while we demand that decisive climate action is matched by equivalent social ambition. Therefore, we regret the lack of attention given to the challenge for some regions to adapt to new legislation in an extremely short period of time with the risk of substantial social impacts.

We acknowledge, the political sensitivity of the discussion. Therefore, we would appreciate the possibility of discussing these concerns with you at the earliest possible opportunity, so as to address these challenges in a constructive manner.

Yours sincerely,



**Esther Lynch**  
General Secretary  
ETUC



**Luc Triangle**  
General Secretary  
industriAll Europe