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Are transport projects within the National Recovery Plan an adequate response to the polycrisis reality?

The investments and reforms provided for in the National Recovery Plan are far from sufficient, but necessary, steps toward solving the challenges of the transport sector in an era of energy and climate crisis.

Piotr Chrzanowski, Krzysztof Krawiec, Krzysztof Ruciński



SUSTAINABLE TRANSPORT

Hazy Green.

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Warsaw, 2023

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Main conclusions

- The National Recovery Plan was developed during the COVID-19 pandemic and, as originally intended, its goal was to neutralise the shock to the economy. The rapid emergence of another crisis related to the war in Ukraine and the prolonged waiting period for funds provide **new context** to the reforms and investments envisioned in the plan.
- The National Recovery and Resilience Plan would be a major opportunity to support the Polish economy, with the “Green Smart Mobility” component accounting for 21% of the plan’s budget. This is a significant reinforcement for sustainable transport projects, which cannot always count on adequate financing. However, investments in transport require years of preparation, and the prospect of spending all funds by 2026 puts the program’s feasibility in question. The problem is particularly related to infrastructure projects and reducing the severity of the rail investment gap for the industry. The launch of the Polish Development Fund pre-financing for the National Recovery Plan investments brings the prospect of support projects closer but may be overdue.
- While it is difficult to expect a single program to solve all the challenges of Poland’s transport system, what emerges from the plan is a lack of a coherent vision of the problems it attempts to address. It contains a series of limited interconnected activities that did not have alternative sources of funding at the time the plan assumptions were made. Before selecting actions to be undertaken, there was no clear analysis of the effectiveness of interventions and an in-depth diagnosis of needs.
- Particularly, projects aimed at enhancing the environmental performance of the urban and regional transport rolling stock raise hopes. However, they carry some risk due to the higher prices of greener solutions (such as electric buses), which could translate into restrictions on the transport offer in cities and metropolitan areas. These projects do not eliminate the backwardness of smaller cities and rural areas in terms of inadequate or absent public transport offers. In the view of rising costs of rolling stock and transport services, the phenomenon of transport exclusion is expected to remain unchanged at best.
- Compared to foreign counterparts, there is a noticeable lack of projects in the NRP related to support for fare integration of the public transport system and projects related to the expansion of the cycle lane network. According to the authors, this is a missed opportunity, since when these issues are concerned, our country’s backwardness is particularly evident.

1. National Recovery Plan for Poland

An essential priority for government actions in 2020-2021 was the response to the SARS-CoV-2 coronavirus pandemic. The associated turbulence has led to significant disruptions in the global economy. Their scale varied depending on a member state's ability to respond to COVID-19.

National Recovery and Resilience Plans of the European Union member states are instruments that were intended to:

- assist individual member states in rebuilding their economies after the economic crisis caused by the pandemic,
- make the economies of these countries more resilient against the negative impact of sudden similar crises in the future.

The national recovery plans of each EU member state include a series of reforms and investments to achieve the desired goals, which should take place between 1 February 2020 and 31 August 2026.

Poland, as the fourth country in terms of aid value (at EUR 36 bn), should be one of the biggest beneficiaries of the national recovery plan system. Our country also has a relatively high (seventh highest) share of aid volume relative to GDP (the rate for Poland is 6.1%; the highest share is in Greece at 16.6%)¹. In its final form, the entire Polish NRP included a pool of funds worth EUR 35.4 bn. Italy remains the main beneficiary of the funds, with support of EUR 191.5 bn.

The NRP was approved by the European Commission in June 2022, and operational arrangements, conditioning the granting of funds, between the state authorities and the European Commission were signed in December 2022². As a result of protracted negotiations related to judicial reform, this happened over a year after the start of the pre-financing of analogous plans for other EU member states³.

The funds provided in the NRP must be settled by 2026. Via a system with the basis for settlement with the European Commission and transfer of funds being the achievement of so-called milestones, meeting the requirements for payment of the first tranche does not automatically lead to easier fulfilment of subsequent requirements. Although the main axis of the NRP discussion

1 Bocian, K., Lewandowski, W., Sychowiec, M., & Wójtowicz A. (2022). [W pół kroku. Przeciętny poziom ambicji Krajowego Planu Odbudowy ryzykiem dla jego sukcesu](#), WiseEuropa.

2 Annex to the Commission Decision approving the Operational Agreements between the Commission and Poland pursuant to Article 20(6) of Regulation (EU) 2021/241.

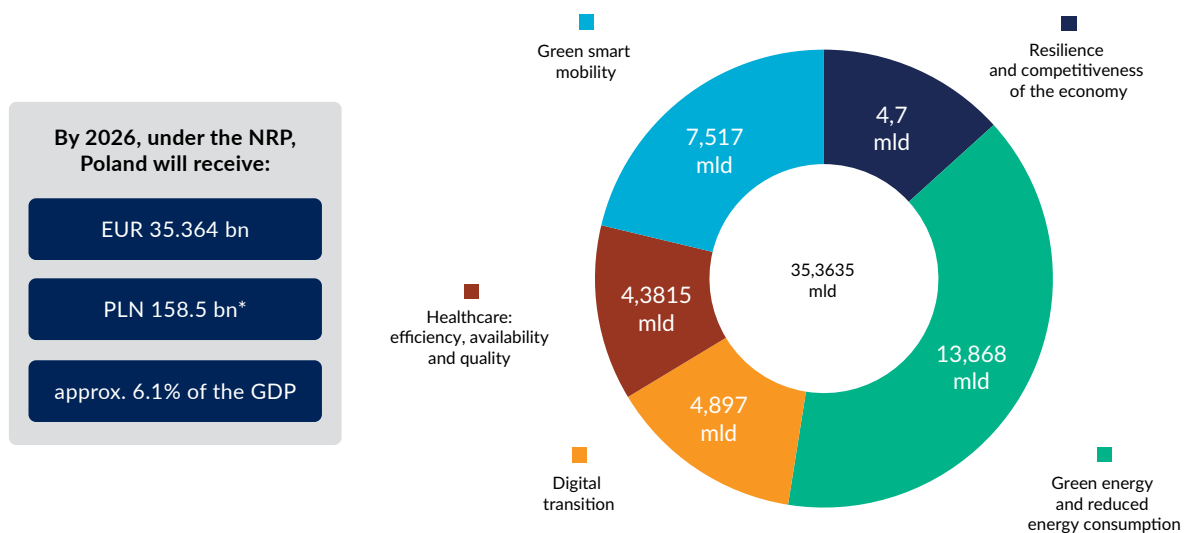
3 The full chronology can be found on the [the European Commission website](#).

concerns the dispute over the rule of law, even after the potential resolution of this issue, Poland must carry out many other reforms to gain access to the pool of funds.

The plan-making guidelines granted member states a fairly high level of autonomy in designing the structure of the funds. As a result, the relationship of some of the measures included in the NRP with the post-Covid recovery of the economy was quite loose. An important additional condition, resulting directly from the EU’s increasingly ambitious climate policy, was the mandatory allocation of 37% of the intended funding to climate goals and 20% to the digitisation of the economy. In the case of Poland’s NRP, 42.7% was allocated for climate goals, while 21.2% was allocated for digitisation.

The thematic breakdown of NRP funds is shown in Figure 1. A broader analysis of the content of the entire document is presented in WiseEuropa’s publication, entitled “[W pół kroku. Przeciętny poziom ambicji Krajowego Planu Odbudowy ryzykiem dla jego sukcesu \[Midstride. The Mediocre Level of the National Recovery Plan Ambition as a Risk to its Success\]](#)”.

Figure 1. The value of funds obtained under the Polish NRP and their allocation



Source: Bocian, K., Lewandowski, W., Sychowiec, M., & Wójtowicz A. (2022). *W pół kroku. Przeciętny poziom ambicji Krajowego Planu Odbudowy ryzykiem dla jego sukcesu*, WiseEuropa.

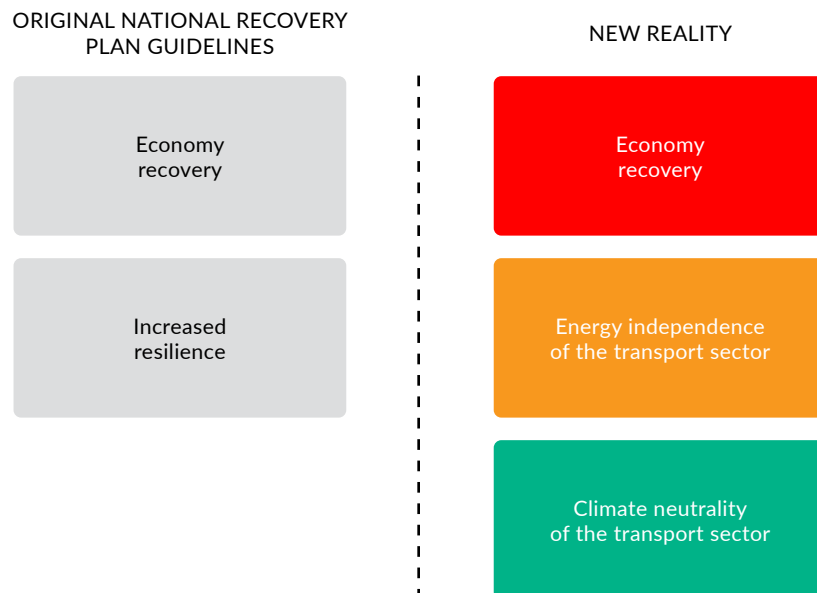
The “Green, Smart Mobility” component, which has 21% of the available allocation, is the second largest component in terms of the amount of support after “Green Economy and Reduction of Energy Intensity.” The goal of this component is to develop a sustainable, safe and resilient transport system to adequately serve the needs of the economy and society⁴. It is the analysis of this part of the plan that is discussed further in this publication.

4 National Recovery Plan, Component E (“Green Smart Mobility”).

2. Turbulent polycrisis times and hazy prospects for transport decarbonisation

While the original idea was to use NRP to recover from the one-time, but in many ways intense, bump caused by the COVID-19 pandemic, it quickly became apparent that the transport industry was facing the challenge of confronting the polycrisis phenomenon. The new reality meant there was a need to deal with the energy crisis triggered by Russia's full-scale aggression against Ukraine in 2022 and confront the European Union's increasingly ambitious climate policy in response to the climate crisis. New European policy tools (RePowerEU, Fit For 55, the European Green Deal) force a change of perspective in thinking about the decarbonisation of the economy and the process of lowering emissions in transport. As a result, the current scale of challenges exceeds the original assumptions of the NRP, which were to rebuild the economy after the COVID-19 pandemic and make it resilient to future similar bumps. This change, taking into account the need to face the energy and climate crisis, is presented in Figure 2.

Figure 2. A new look at the implementation of the National Recovery Plan



Source: WiseEuropa's own compilation



The following processes, which have led to an increase in the country's level of dependence on fossil fuels, remain the context for the design of transport investments and policies in the changed reality remains:

- In Poland, the importance of individual vehicle transport was dynamically growing, mainly at the expense of rail transport. Between 2004 and 2022, a total of 4149 kilometres of motorways and expressways⁵ and about 50 kilometres of new rail lines⁶ were put into service in Poland. A series of investments in rolling stock, railroad stations and stops, as well as the gradual modernisation and revitalisation of railroad lines, led to an increase in passenger numbers starting in 2010 after years of decline.⁷ Although the pandemic negatively affected the number of passengers using railways, it returned to its pre-pandemic values⁸.
- The importance of bus transport outside the major centres has been systematically and rapidly declining, its role in many regions is already marginal⁹. PKS [*Motor Transport Company*] routes organised by the public sector have been replaced by market-shaped, unstable connections by private carriers. The COVID-19 pandemic exacerbated a multi-year trend of passenger outflows and accelerated the elimination of bus services. In contrast to the recovery of demand for rail transport, more bus transport companies collapsed after the pandemic (including PKS Wałcz¹⁰, PKS Radom¹¹ and PKS Łódź¹²). In 2018, it was estimated that nearly 14 million people in Poland did not have access to public transport¹³. According to recent publications, 20% of towns in Poland do not have access to public transport at all, and twice as many have it only on school days¹⁴. More and more people living in smaller urban centres and rural areas face the problem of not being able to meet their basic transport needs. A significant number of local governments do not perceive the organisation of public transport as their responsibility, so they organise only transport to schools.
- In freight, the railroads have not been able to match the dynamic growth of the road freight segment in any way. Although freight trains performed freight work of 62.5 million tonne-kilometres in 2022, this was an increase over 2010 (49.1 m tkm)¹⁵, the total share of railroads in freight in the years leading up to the pandemic (2015-2020) was steadily declining and was about 11%. The prospect of decarbonising the road freight transport sector accounting for 83.4% of the freight work structure¹⁶ is still distant and hazy.

5 General Directorate for National Roads and Highways data.

6 The longest new project, the Pomeranian Metropolitan Railway, is 19.5 km long.

7 [Office for Railway Transport data.](#)

8 342.2 million rail passengers in 2022 compared to 335.9 million in 2019.

9 Statistics Poland data show that bus transport (excluding city connections) carried 570 m passengers in 2010. This value dropped to 169 m in 2021.

10 Infobus. (17 September 2022). [PKS Wałcz w stanie likwidacji. Autobusy będą kursować tylko do końca roku.](#)

11 Transport Publiczny. (13 December 2020) [PKS Radom zakończył działalność przewozową.](#)

12 Transport Publiczny. (19 May 2021). [PKS Łódź z zaledwie jedną parą połączeń. Praktyczny koniec działalności przewozowej.](#)

13 Jagiellonian Club. (2018), [Publiczny transport zbiorowy w Polsce. Studium upadku.](#)

14 information from the [TransportPubliczny.pl](#) portal based on data of the Association of Transport Economics.

15 [Office for Railway Transport data.](#)

16 Statistics Poland. (2023). [Transport drogowy w Polsce w latach 2020 i 2021.](#)



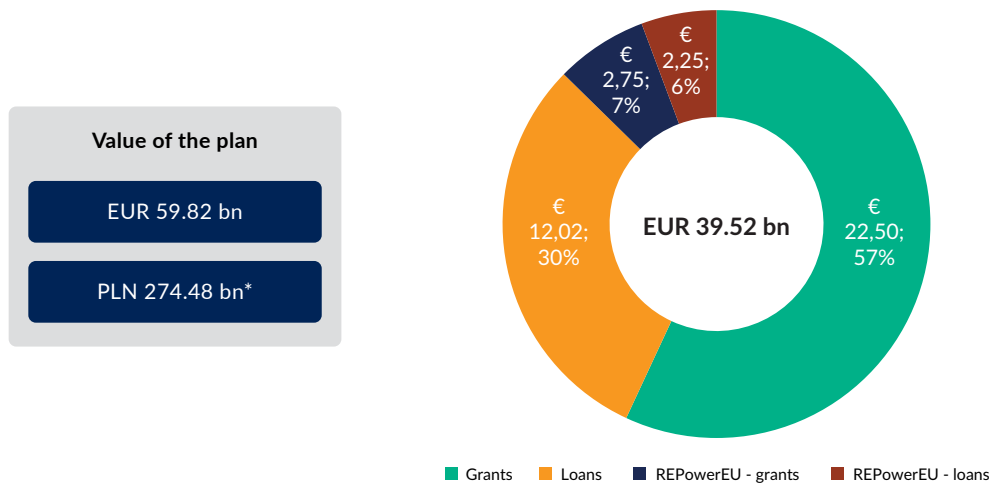
The processes outlined above indicate that despite declarative support for sustainable transport at the policy level, trends in the sector have largely been in the opposite direction for years. However, the geopolitical situation resulting from Russia's full-scale aggression against Ukraine and ongoing hostilities, as well as the pan-European energy crisis resulting from them, forces a revision of the approach and the need to accelerate the Polish economy's independence from fossil fuels. The accumulation of crises also led to a change in the economic situation, which forced an update of the provisions of the National Recovery Plan also in the section on mobility.

3. Mobility in the National Recovery Plan revision

In response to the war in Ukraine, the European Commission has prepared a plan to move away from Russian fossil fuels, called REPowerEU, and an additional pool of funds, allowing for the revision of individual member states' NRPs.

In the second half of April 2023, consultations were held on the draft revision of the Polish NRP¹⁷, which is an attempt to adapt the provisions of the document to new realities. The revision was mandatory due to the need to program activities concerning REPowerEU. The purpose of the new activities is to implement projects that fit in the direction of making Europe independent of Russian fossil fuels before 2030.

Figure 3. The amount of funds provided for in the NRP revision, together with an indication of their sources of origin



*as of 4 May 2023

Source: WiseEuropa's own compilation based on Ministry of Development Funds and Regional Policy data

In addition to the new distribution of funds, several changes were also made due to, among other things, preliminary assessments of project feasibility and increases in investment costs. The proposed changes affected 5 of the 6 components and covered 13 of the 48 reforms and 36 milestones. The proposal includes 7 new milestones and targets¹⁸. In the NRP revision proposed in 2023, the share of funds for climate goals increased to 64.2%, and for digital goals to 24.9%. (originally 42.7% and 21.2%, respectively). According to the timetable published by the Ministry of Development Funds and Regional Policy, negotiations of the revised provisions with the European Commission should take place in Q3 2023.

17 Ministry of Development Funds and Regional Policy. [Konsultacje rewizji Krajowego Planu Odbudowy](#), accessed on: 2 May 2023.

18 For more information on milestones and target values, see Section 3.

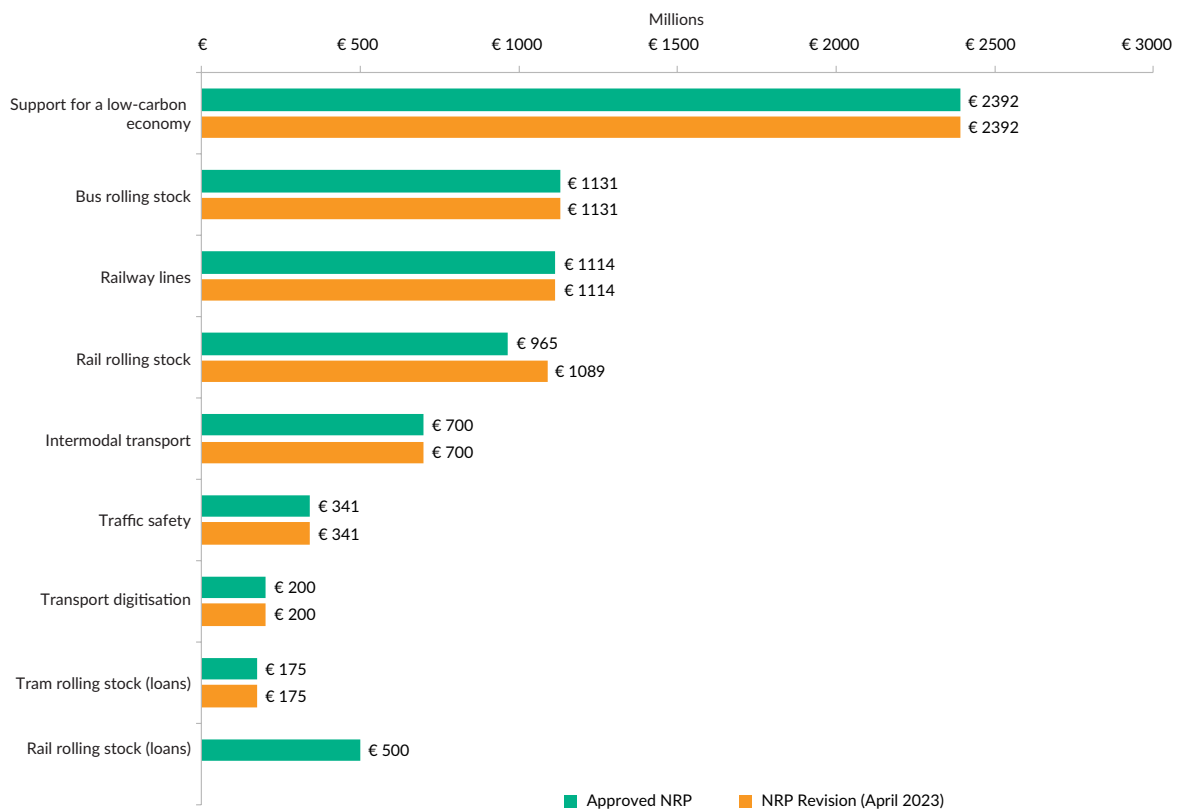
Table 1. Proposed changes to Component E “Green Smart Mobility” of the National Recovery Plan

	NRP	NRP Revision
Original projected budget	EUR 7.5 bn	EUR 7.1 bn
Value of loans	EUR 0.7 bn	EUR 0.2 bn
Subsidy value	EUR 6.8 bn	EUR 6.9 bn

Source: WiseEuropa’s own compilation based on the draft revision of the National Recovery Plan

In the area of transport, the increase in costs due to inflation has been primarily taken into account. One significant change in the proposed allocation of funds was an increase in the rolling stock budget from **EUR 965 m to EUR 1.089 bn**, at the expense of dropping the loan portion (EUR 500 m). The breakdown of the allocation of funds in the NRP revision in Component E is shown in Figure 4.

Figure 4. Breakdown of the allocation of funds in Component E “Green Smart Mobility”, in accordance with the draft revision of the National Recovery Plan



Source: own compilation

In the component in question, the largest share of subsidies is to be invariably allocated to the construction and modernisation of railroads (EUR 2.392 billion). Combined with the EUR 1.089 bn for rolling stock and the funds for intermodal transport, the prioritisation of rail transport in the distribution of NRP funds is evident (it is as much as 53% of the total subsidy amount).



The most significant changes in the draft concern a reduction in the scale of activities, the postponement of some deadlines, or the complete abandonment of some reforms (e.g. a unified ticketing system for rail transport). Although the legal basis for the changes in most cases was cited as “objective circumstances” resulting from the new situation after the outbreak of war in Ukraine, one cannot rid of the impression that, for example, in the case of the extension of the e-TOLL system or the abandonment of the construction of an integrated rail ticket, the lack of political will was a factor.

The changes to the document proposed by the government are currently at the consultation stage – however, given the original process of agreeing on the content of the NRP, no further significant changes should be expected.

4. Polish milestones on the way to green and smart mobility

The core of the reforms contained in the National Recovery Plan remains the milestones determining the payment of subsequent tranches of support. Table 2 shows the progress in the implementation of actions and reforms resulting from the NRP.

Table 2. Summary of implementation status and changes in Component E “Green Smart Mobility”

Number	Related action (reform or investment)	Milestone/ Target value	Approved NRP		Draft NRP revision	
			Name	Implementation date	Action	Change of date
MILESTONES FOR THE SUBSIDY PART						
Requirements for the payment of the first tranche						
E8G	E1.1.1 Support for the low-carbon economy	Milestone	Establishment of a financial instrument (Fund) for zero-emission/low-emission mobility and energy	Q2 2022 Created by the National Fund for Environmental Protection and Water Management ¹⁹		
E23G	E2.2 Increased transport safety	Milestone	Entry into force of legislation introducing: priority for pedestrians at crosswalks, uniform speed in built-up areas, a minimum distance between vehicles, and road safety goals by 2030 (-50% fatalities in accidents)	Q4 2021 Implemented ²⁰		
Requirements for the payment of the second tranche						
E1G	E1.1 Increased use of environmentally friendly transport	Milestone	Entry into force of the act mandating the purchase of only low- and zero-emission buses in cities with populations over 100,000 starting in 2025.	Q4 2022	Publication of the act	Q4 2025
E9G	E1.1.1 Support for the low-carbon economy	Milestone	Selection of financial intermediaries	Q3 2022 Selected ²¹		Q3 2023

19 Article 38 of the Act of 15 December 2022 on special protection of certain consumers of gaseous fuels in 2023 in connection with the situation in the gas market (Journal of Laws of 2022, item 2687).

20 Act of 25 February 2021 on amendments to the Act on Road Traffic (Journal of Laws 2021 item 463)

21 [Ranking list of the “Industry for Transformation - Increasing the Potential of Ventures to produce zero- and low-carbon solutions” program](#), accessed on: 12 May 2023.



Number	Related action (reform or investment)	Milestone/Target value	Approved NRP		Draft NRP revision	
			Name	Implementation date	Action	Change of date
E15G	E2.1 Increased competitiveness of rail sector	Milestone	Entry into force of the Act on amendments to the Act on Railway Transport providing immunity for railway carriers. Ministry's decision to set priorities for intermodal transport and remove bottlenecks to increase rail capacity	Q4 2022		Q3 2023
Requirements for the payment of the third tranche						
E2G	E1.1 Increased use of environmentally friendly transport	Milestone	Measures to support the development of Sustainable Urban Mobility Plans (SUMP) and the adoption by the Ministry of Infrastructure of incentives for their implementation with technical and financial support for all functional urban areas	Q1 2023	The revision limits support to technical only	
E16G	E2.1 Increased competitiveness of rail sector	Milestone	Establishment of a toll system on new roads	Q1 2023		Q2 2024
Requirements for the payment of the fourth tranche						
E13G	E1.1.2 Zero- and low-emission public transport (buses)	Milestone	Zero- and low-emission vehicles: selection of beneficiaries	Q4 2023		Q3 2024
E19G	E2.1.2 Passenger railway rolling stock	Milestone	Signing of contracts for passenger rolling stock	Q3 2023	Achieving the milestone by signing contracts rather than purchasing rolling stock	Q1 2024
E21G	E2.1.3 Intermodal projects	Milestone	Signing orders for intermodal transport projects: 10 transshipment centres and 250 units of rolling stock	Q4 2023	Modernisation of 8 transshipment centres and purchase of 200 units of rolling stock	Q4 2024
E24G	E2.2.1 Investments in transport safety	Target value	Completion of bypasses and removal of traffic safety black spots/hotspots	Q4 2023		
Requirements for the payment of the fifth tranche						
E27G	E2.2.2 Digitisation of transport	Target value	Installation: Dynamic Passenger Information Systems, control and level crossing systems in 55 areas	Q1 2024		Q1 2025
Requirements for the payment of the sixth tranche						
E3G	E1.1 Increased use of environmentally friendly transport	Milestone	Entry into force of legislation introducing registration fee on ownership of vehicles related to emissions in line with the "polluter pays" principle	Q4 2024		



Number	Related action (reform or investment)	Milestone/Target value	Approved NRP		Draft NRP revision	
			Name	Implementation date	Action	Change of date
E6G	E1.1 Increased use of environmentally friendly transport	Milestone	Bus lines supported by the public utility Bus Service Development Fund	Q4 2024	Achieving the objectives through the implementation of the Bus Service Development Fund's own tasks	
E17G	E2.1.1 Railway lines	Milestone	Signing contracts through open and competitive tenders	Q4 2024		
Requirements for the payment of the seventh tranche						
E5G	E1.1 Increased use of environmentally friendly transport	Target value	Cities where new SUMP's have been adopted	Q2 2025		
Requirements for the payment of the eighth tranche						
E12G	E1.1.1 Support for the low-carbon economy	Target value	SMEs and mid-cap companies supported through specific investments covered by the Fund - 150	Q4 2025	Support for 75 entities	Q2 2026
Requirements for the payment of the ninth tranche						
E4G	E1.1 Increased use of environmentally friendly transport	Milestone	Entry into force of legislation introducing a tax on the ownership of vehicles related to emissions in line with the "polluter pays" principle	Q2 2026		
E7G	E1.1 Increased use of environmentally friendly transport	Target value	New zero-emission vehicles	Q2 2026		
E10G	E1.1.1 Support for the low-carbon economy	Target value	Installed production capacity for new zero-emission vehicles - 100,000 vehicles	Q2 2026	Reduced production capacity to 60,000 zero-emission vehicles	
E11G	E1.1.1 Support for the low-carbon economy	Target value	Installed production and storage capacity of zero/ low carbon alternative fuels/ energy - 1000 MW	Q2 2026	Reduced production and storage capacity at 600MW	
E14G	E1.1.2 Zero- and low-emission public transport (buses)	Target value	New zero-emission and low-emission vehicles for urban public transport and low-emission vehicles in suburban traffic	Q1 2026	New zero-emission and low-emission vehicles for urban public transport and in suburban traffic	Q2 2026
E18G	E2.1.1 Railway lines	Target value	Modernisation of 478 km of railroad lines, including 300 km in accordance with TEN-T standards	Q2 2026	Reduced number of modernised lines	Q2 2026



Number	Related action (reform or investment)	Milestone/Target value	Approved NRP		Draft NRP revision	
			Name	Implementation date	Action	Change of date
E20G	E2.1.2 Passenger railway rolling stock	Target value	Electric and ERTMS-equipped rolling stock in use on regional and long-distance rail lines 108 units of regional and long-distance rolling stock	Q2 2026	Signing contracts for the supply of rolling stock (109 units). Increased budget in exchange for abandonment of E2.3.1 investments	
E22G	E2.1.3 Intermodal projects	Target value	Increased transshipment capacity	Q2 2026		
E25G	E2.2.1 Investments in transport safety	Target value	Completion of bypasses and removal of traffic safety black spots/hotspots and installation of automatic traffic surveillance equipment	Q2 2026		
E26G	E2.2.2 Digitisation of transport	Milestone	Uniform ticketing system in rail transport	Q2 2026	The milestone removed in the National Recovery Plan revision	
E28G	E2.2.2 Digitisation of transport	Target value	Installation of automatic control systems, level crossings, 180 ERTMS on-board equipment and related entry into service	Q2 2026	Reduced number of ERTMS on-board units to 160	
MILESTONES FOR THE LOAN PART						
E1L	E1.2 Increased share of zero-emission and low-emission transport	Milestone	Introduction to the Polish legal order of the obligation to introduce clean transport zones in the most polluted cities	Q2 2024		
E2L	E1.2 Increased share of zero-emission and low-emission transport	Milestone	Document confirming the introduction of clean transport zones in cities	Q1 2025		
E3L	E1.2.1 Zero-emission urban public transport (tram)	Milestone	New trams - signing contracts with beneficiaries	Q1 2025	New trams - consulting the conditions of support with the beneficiaries	
E4L	E1.2.1 Zero-emission urban public transport (tram)	Target value	New trams (110 units) in operation	Q2 2026	Contract for the supply of 88 trams	
E5L	E2.3 Increased transport accessibility, security and digital solutions	Milestone	Entry into force of the legal act	Q4 2022	Expanding with the E6L milestone targets	Q3 2023

Number	Related action (reform or investment)	Milestone/Target value	Approved NRP		Draft NRP revision	
			Name	Implementation date	Action	Change of date
E6L	E2.3 Increased transport accessibility, security and digital solutions	Milestone	Upgrading rail rolling stock	Q2 2024	The milestone removed in the National Recovery Plan revision	
E7L	E2.3.1 Rolling stock of regional passenger railroads	Target value	Launch of regional trains equipped with ERTMS	Q2 2026	The milestone removed in the National Recovery Plan revision	

Source: WiseEuropa's own compilation based on the Annex to the Proposal for implementing the decision of Council on the Approval of Poland's Recovery and Resilience Plan Assessment

Despite the two milestones assigned to Component E were achieved, the payment of the first tranche of NRP funds is contingent on the simultaneous achievement of the other 35, including the EC's acceptance of the most controversial provisions on the rule of law and onshore wind power investment.

In the absence of a clear horizon for obtaining an agreement between the Polish government and the European Commission on the unblocking of funds from the NRP, even the deadlines extended in the amendment proposal may not be sufficient to carry out all the intended activities. In many cases, the amendment proposals used a trick to change the settlement rules for a given action, such as replacing the deadline for the deployment of new rolling stock with the signing of contracts for its delivery. However, this would require extending the settlement of the NRP funds beyond June 2026, which the European Commission still has not agreed to. Given the objections to the timetable of tasks and the delays to date in the implementation of investment projects on the railroad, it is likely that also those planned in the NRP may not be settled on time.

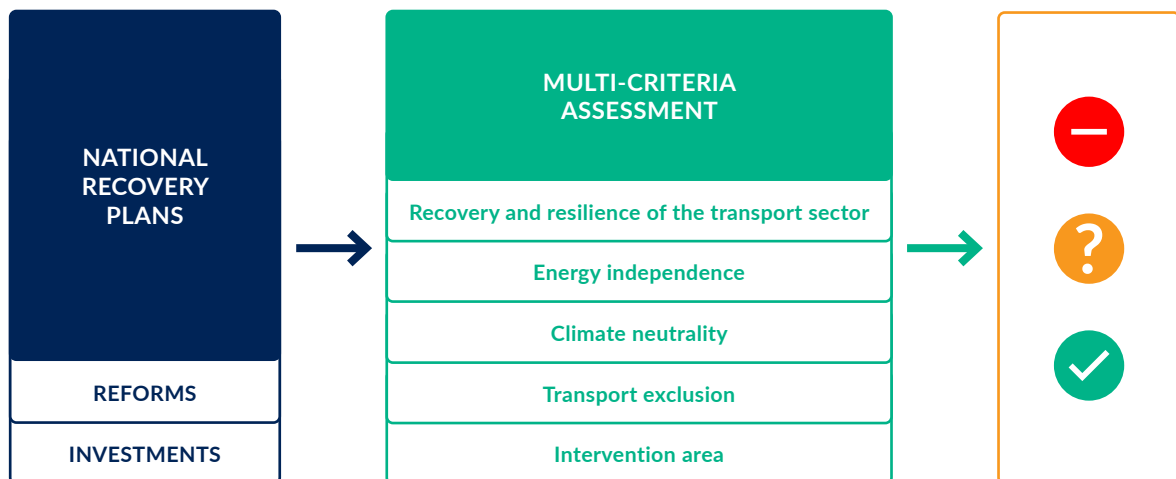
The changes proposed in the NRP revision concern the undertakings required for the payment of funds - therefore, it will be necessary to prove that the modifications are actually due to objective circumstances as indicated in the justification, rather than due to a desire not to act. This should not create difficulties in the event of a change in costs: inflation adjustments affect most plans. However, it will be much more difficult to justify the delays that are occurring or withdrawals from reforms.

5. Assessment of investments and reforms under the NRP

The purpose of WiseEuropa's study of Component E ("Green Smart Mobility") of the National Recovery Plan is to determine to what extent the actions provided for in it remain relevant in the context of the challenges described in Section 2. Therefore, it was evaluated how the various elements of the plan translate into **minimising the impact of short- or long-term crises on the operation of the transport sector**. Another aspect of the analysis was the impact of the planned activities on **Poland's energy independence** and their impact on **achieving climate neutrality in the transport sector**. It was also important to identify the area of intervention affected by these NRP activities, **with particular attention to the specific needs of smaller cities and rural areas**. The transport problems of these areas remain outside the effective impact of transport policies.

The content of the component in question was assessed using the 5 criteria shown in Figure 5 and discussed at the beginning of each subsection of the assessment. These are rebuilding and resilience of the transport sector, energy independence, climate neutrality, reducing the scale of transport exclusion, and area of intervention.

Figure 5. Parameters for qualitative multi-criteria assessment of reforms and investments specified in Component E "Green Smart Mobility"



Source: WiseEuropa's own compilation

A three-point scale for assessing reforms and investments was adopted for the areas of analysis:

- ⊖ The action does not have a positive impact on the improvement of the situation in the area.
- ? Actions to some extent improve the situation in the area.
- ✓ Actions decisively improve the situation in the area.

Reforms and investments were also assessed in terms of impact areas according to the following key:

- a cross-action covering the economy or society at large
- actions for agglomerations, large cities and their functional areas
- actions directly affecting rural areas and small cities

The following section summarises the results of the assessment of the reforms and actions identified in the NRP in terms of the five criteria adopted. This made it possible to identify actions that best respond to the current challenges of the transport sector.

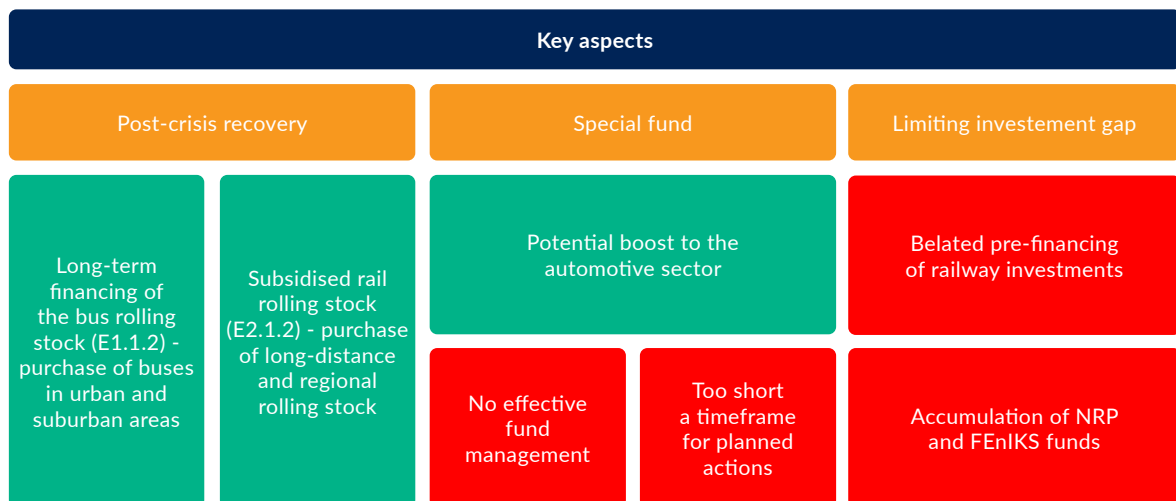
Table 3. Assessment of investments and reforms under the NRP

Reform/ Action			recovery and resilience of the transport sector	energy independence	climate neutrality	transport exclusion	intervention area	
E1. Increasing the share of zero- and low-carbon transport as well as counteracting and reducing the negative impact of transport on the environment	Reform	Investment						
	E1.1. Increased use of environmentally friendly transport							
	Increased required level of green vehicles in public procurement	⊖	?	✓	⊖	●●●		
	Introduction of a statutory obligation requiring cities to replace buses with electric and hydrogen ones	⊖	?	✓	⊖	●●		
	New regulations to improve vehicle charging installations in residential buildings	?	✓	✓	⊖	●●●		
	Introduction of emissions-dependent vehicle registration fee and ownership tax	⊖	✓	✓	✓	●●●		
	Amendment to the Act on the public utility Bus Service Development Fund	✓	?	?	✓	●		
	SUMP preparation support	?	?	?	?	●●		
	E1.1.1. Support for the low-carbon economy (green mobility industry support fund)	✓	✓	✓	⊖	●●●		
	E1.1.2. Zero and low-carbon public transport (purchase of buses)	✓	?	✓	?	●●		
	E1.2. Increasing the share of zero- and low-carbon transport as well as counteracting and reducing the negative impact of transport on the environment							
	E1.2. Increasing the share of zero- and low-carbon transport as well as counteracting and reducing the negative impact of transport on the environment (clean transport zones)	⊖	?	✓	?	●●		
	E1.2.1. Zero-emission public transport in cities (trams)	✓	✓	✓	⊖	●●		
	E2.1. Increased competitiveness of the rail sector							
Enabling the reduction of fees for access to railway infrastructure	✓	✓	✓	?	●●●			
Support for the development of intermodal transport	✓	✓	✓	⊖	●●●			
E2.1.1. Railway lines	✓	✓	✓	✓	●●●			
E2.1.2. Passenger railway rolling stock (national, regional)	✓	✓	✓	?	●●●			
E2.1.3. Intermodal projects	✓	✓	✓	⊖	●●●			
E2.2. Increased transport safety								
Amendment to the Road Traffic Act - protection of pedestrians	⊖	?	?	⊖	●●●			
Increased charges for traffic violations	⊖	⊖	?	⊖	●●●			
E2.2.1. Investments in transport safety	?	?	?	⊖	●●●			
E2.2.2. Digitisation of transport	?	?	?	?	●●●			
E2.3. Increased transport accessibility, security and digital solutions								
Increased requirements for rail rolling stock availability	⊖	⊖	⊖	?	●●●			
E2.3.1. Passenger rolling stock of regional railways	✓	✓	✓	?	●●●			

Source: WiseEuropa's own compilation

Recovery and resilience of the transport sector

Recovery refers to the rebuilding of the rolling stock fleet, the restoration of transport performance to pre-crisis levels, and the restoration or creation of connections where they were suspended as a result of years of degradation of the offer or crises. This dimension also relates to the improvement of transport companies in the market. **Resilience** is meant as the ability to continue functioning or quickly regain desired parameters in the face of disruptive or unexpected circumstances. On the technical side, these include extreme weather events, major traffic incidents, and infrastructure and control system failures. Resilience should also be considered in the context of building sustainable and stable institutions that are able to maintain and raise the standard of living of the population in the long term. A resilient transport sector is also able to weather economic crises and periods of downturn. This requires independence in sourcing energy.



Due to the delay in the start of investments financed by the National Recovery Plan, it may be problematic for the transport sector to quickly recover the economic potential lost as a result of the COVID-19 pandemic. Maintaining the pre-crisis level of the offer in public transport will not succeed even with the NRP funds, as the period of reduced demand for passenger transport has triggered another wave of cuts in regional passenger transport. The most important measures in the post-crisis recovery trend should be considered those related to securing long-term funding for rolling stock (E1.1.2, E.2.1.2) and reforms related to the stability of the offer (amendment of the Act on the public utility Bus Service Development Fund).

A support fund for the low-carbon economy (tasks E1.1.1.) could be key to boosting the sector. However, in the absence of effective oversight of the allocation of funds, there is a risk that the fund's resources will not improve the condition of the affected companies in the sector. The explicit indication that the goal of the task is to increase the installed production capacity of new zero-emission vehicles seems to unduly limit the scope of projects related to industrial

development for low- and zero-emission transport. Although the goal of increasing the role of Poland as a producer of such vehicles is desirable, changing the place of Polish business in value chains is a more complicated and long-term process than the perspective of the discussed plan. Hopes for the possibility of the smooth operation of such a fund are also dampened by the fate of the Low Emission Transport Fund²², which was liquidated four years after the establishment of the organisational structures even before the start of financing.

The NRP funds (E2.1.1.) were an opportunity to reduce the adverse effects of the gap in transport investments related to the end of the 2014-2020 EU perspective. However, an agreement on pre-financing railroad investments worth almost PLN 11 billion from the Polish Development Fund was not obtained until early 2023²³. With the start of projects financed by the FENIKS program²⁴ getting closer (the first call is scheduled for November 2023), there is a risk that the industry, weakened by a limited number of contracts, will not be able to absorb all the funds coming in at the same time.

In the face of changes in the structure of rail freight, investments in rolling stock and intermodal terminals will be key to maintaining the competitiveness of the rail cargo industry (E.2.1.3). This is one of the areas where the most profound changes have taken place since the original plan was formulated. After the outbreak of the war in Ukraine, the circumstances surrounding the transit of goods from China through Russia and Belarus changed. Although the sanctions did not extend to transit through these countries, the loss of confidence among shippers and insurers and uncertainty about the future made this destination less attractive. In the absence of support from the European Commission for the expansion of the Małaszewicze terminal, a gateway to the EU in the New Silk Road project²⁵, it is necessary to seek alternative scenarios for the development of rail transport. This is also influenced by the growing importance of alternative routes through the Caucasus and Turkey or the long-term prospect of friction between the US and China.

However, the new environment is also an opportunity for the railroads: coupled with the urgent need to move away from fossil fuels in transport (primarily those coming from Russia), rail investment will become increasingly important as the years go by.

Therefore, the prequalification of NRP projects related to intermodal transport, which began in March 2023, should be viewed positively. Support under the NRP may be provided for investments that are in line with the objectives set out in the document "Directions of Intermodal Transport Development until 2030 with an Outlook to 2040".²⁶ However, the actual date of releasing the funds is still unknown²⁷.

22 CIRE. (24 July 2020), Sejm za likwidacją Funduszu Niskoemisyjnego Transportu i zmianą terminu rozpoczęcia poboru opłaty mocowej.

23 Portal Samorządowy. (5 March 2023), MI zawarło z PFR umowę na prefinansowanie inwestycji drogowych i kolejowych z KPO.

24 Full name of the program: Fundusze Europejskie na Infrastrukturę, Klimat, Środowisko 2021-2027, Source of information: Czubiński R. (8 May 2023), [CUPT: Można już składać pierwsze wnioski](#), Rynek Kolejowy.

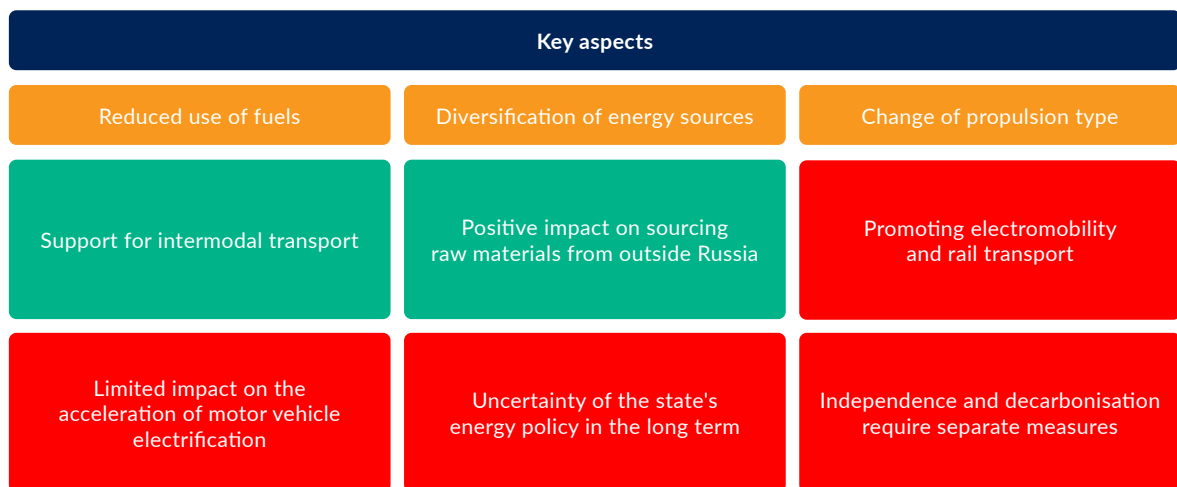
25 Jakub Jakóbcowski (2022), Kolejowy Jedwabny Szlak w cieniu wojny na Ukrainie, Ośrodek Studiów Wschodnich.

26 Centrum Unijnych Projektów Transportowych. Wstępna kwalifikacja projektów na inwestycje w zakresie transportu intermodalnego w ramach Krajowego Planu Odbudowy i Zwiększania Odporności, accessed on: 11 May 2023.

27 Centrum Unijnych Projektów Transportowych. [KPO: Prekwalifikacje projektów intermodalnych](#), accessed on: 15 May 2023.

Energy independence

Energy independence is understood as a direct or indirect impact on reducing fuel imports, primarily by changing the way public transport vehicles are powered to alternative fuels that can be produced locally or from stable sources. Measures to reduce fuel consumption also contribute to independence.



The prospect of energy independence is a new aspect of the NRP's perception following the outbreak of war in Ukraine. At the time of the document's creation, it was not the main point of consideration for its authors. When considering the projects and reforms included in the plan in terms of energy independence, there are three main aspects to consider:

- reducing fuel consumption, which can be achieved by, among other things, using vehicles more efficiently, changing modes of transport and using more efficient propulsion systems;
- diversifying energy sources, e.g. by increasing the share of bio components in liquid fuels;
- changing the type of propulsion system to one that allows local sourcing of fuel (under Polish conditions, this is primarily electricity and hydrogen).

It should be assessed that the National Recovery Plan in its transport component contributes to the above. Far-reaching promotion of transport using alternative sources of propulsion, including electromobility (E1.1) and rail transport (rolling stock and line investments, as well as the development of intermodal transport) also remain relevant in the context of the war in Ukraine and are a way to increase the country's level of energy independence.

In the new reality, policy-making toward energy independence must take the security perspective even more explicitly into account. Given the limited scale of the oil and natural gas deposits

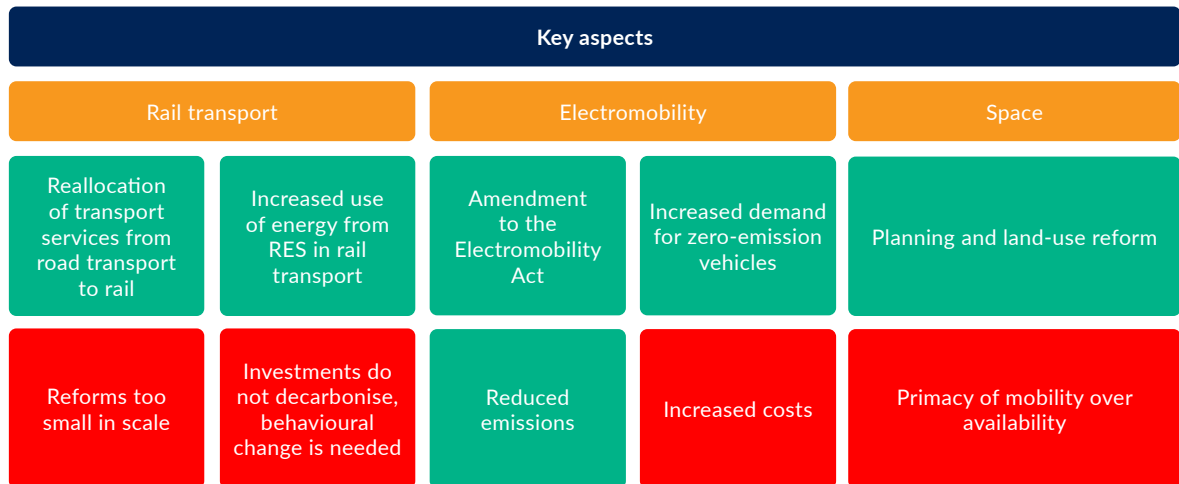


located in Poland and our exclusive economic zone in the Baltic Sea, Poland will be dependent on imports of these raw materials in the long term. Withdrawing from Russian fuel imports makes it necessary to diversify the supplies that will come to Poland by sea. The growing importance of imports from Saudi Arabia increases the exposure to unrest in the Middle East. Simply changing the source of supply does not automatically guarantee a higher level of energy independence.

The need to balance environmental requirements, foreign policy and security considerations and the economic efficiency of projects makes trade-offs necessary. The drive to decarbonise transport has not always translated into increased energy independence in the past. For example, the promotion of gaseous fuels contributed to an increased reliance on natural gas imports (largely from Russia).

Climate neutrality

Under this assessment, activities are part of the pursuit of **climate neutrality**²⁸, when they directly or indirectly contribute to reducing the level of greenhouse gas emissions or support the creation of conditions in which these gases are captured from the atmosphere. In the case of transport systems, we assess the impact of investments and reforms on the system as a whole, not just on the emissions of a specific vehicle.



Poland does not have a viable plan for decarbonising the transport sector. Trends in the spatial development and the growing transport intensity of the economy, combined with the declining importance of less carbon-intensive forms of shuffling goods and commodities, make it necessary to try to find tools to stop the growth of emissions before discussing climate neutrality.

²⁸ The European Green Deal identifies a 90% reduction in transport sector emissions by 2050 as a requirement for achieving climate neutrality.

In Poland, a significant increase in transport emissions (by 76%) was observed between 2005 and 2017²⁹, and decarbonisation scenarios assume that even despite the increase in the share of electric vehicles, emissions levels in 2030 will be higher than today. Their decrease is therefore impossible without a radical change in policies, and the projects enshrined in the NRP even in the most optimistic scenario will slightly reduce the scale of growth.

As indicated in the NRP, the challenge remains that as much as 93% of greenhouse gas emissions in transport are generated by road transport. However, the measures indicated in the document do not in any way guarantee a significant improvement in the situation.

The change in the mobility sector requires a broader view: worsening spatial chaos coupled with the decline of public transport in non-urban areas means that passenger transport emissions will continue to rise. In modern mobility policy, the concept of “primacy of accessibility over mobility,” i.e. shortening distances between destinations, remains a key tool for reducing transport emissions. Therefore, also in terms of mobility, a key provision of the NRP remains the reform of spatial planning and development. With this aspect in mind, the lack of active mobility projects with objectives explicitly directed at environmental and climate issues is noteworthy in the NRP.

In Poland’s transport policy, it is electromobility that is seen as the most important part of the decarbonisation effort. Among the reforms with the greatest potential impact on greenhouse gas emissions, the amendment to the Act on electromobility (reform E1.1.) should be mentioned, which will increase the levels of the required share of zero and low-emission vehicles in public procurement. An increase in demand for this type of vehicle should be considered the most important effect of the introduced reform. Increasing the requirements for the purchase of clean vehicles is subject to the risk of increasing the cost of service delivery beyond acceptable levels in less affluent centres, so it is necessary to provide protective measures.

The assumption of a favourable impact of electrification of existing fleets in public transport must undergo practical verification. Although the statutory obligation mandating cities to replace buses with electric and hydrogen ones reduces emissions from public transport fleets (E1.2), it will lead to increased costs, which may translate into reduced public transport offerings. With conventional motorisation development still unfettered, the potential effects of deteriorating accessibility could become more severe for the environment than the effects of fleet replacement. Therefore, in the short term, the requirement to electrify fleets may make it more difficult to rebuild the transport sector than under less restrictive regulations. However, this action undoubtedly leads to decarbonisation in the long term, particularly after the implementation of investments in decarbonising the Polish electricity system, which is included in other components of the NRP.

There is a noticeable lack of projects in the NRP that are effective ideas for changing emissions originating from the road freight transport sector. This is particularly important in the context of the participation of Polish road entrepreneurs in the EU transport market at 21%³⁰. To maintain the competitiveness of Polish entrepreneurs in the face of climate policies, support is needed in the area of reducing emissions and lowering the carbon footprint of their operations.

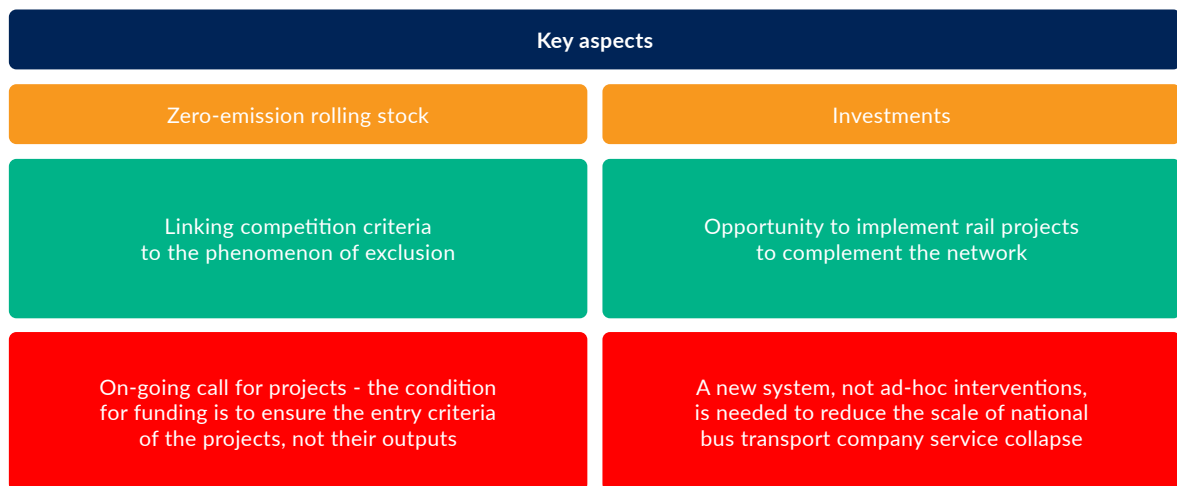
29 Rabięga, P., Sikora, P. (2020). [Ścieżki redukcji emisji CO2 w sektorze transportu w Polsce w kontekście „Europejskiego Zielonego Ładu”](#)

30 SPOTDATA, Związek Pracodawców Transport i Logistyka Polska (2022), [Transport drogowy w Polsce 2021+](#).

The allocation of more than half of the funds to rail transport (E2.1.1-3) should be viewed as positive as far as striving for climate neutrality is concerned. The assessment was influenced by the railroad's energy efficiency advantage over road transport and initiatives in the sector such as the "Zielona Kolej [Green Railway]³¹" program, which aims to achieve 85% of energy from RES in rail transport by 2030.

Reducing the scale of transport exclusion

Another of the evaluation criteria was the impact on reducing the phenomenon of **transport exclusion**, i.e. restoring the possibility of using public transport for the residents of a given area or improving the parameters of its operation where the offer remains underdeveloped.



The National Recovery Plan translates to a limited extent into levelling the phenomenon of transport exclusion.

The program for the purchase of zero- and low-emission buses (E1.1.2), provided for in the NRP, is one of the first rolling stock financing programs to comprehensively address the need to renew the fleet of vehicles used to serve areas other than large and medium-sized cities. Key criteria from the angle of reducing the phenomenon of transport exclusion and supporting areas include support for transport-excluded areas or a clear indication of the link between rolling stock purchases and the Bus Service Development Fund. This project combines the opportunity to activate the industry as part of the sector's recovery, strengthen resilience while maintaining energy independence, and set a path toward climate neutrality. However, the reforms planned in the NRP (E1.1) in the field of replacing the bus fleet with a zero-emission one may be counterproductive. As the cost of maintaining public transport systems increases, cities may reduce the scale

³¹ More about the Zielona Kolej program: <https://zielonakolej.pl/>, accessed on: 15 May 2023.

of transport services to neighbouring municipalities. This could create a situation where there is a further disconnect between cities served by zero-emission buses and rural areas without public transport.

Changes in rolling stock accessibility standards (E.2.3) make little difference to passengers with disabilities. Carriers recognise the needs of people with limited mobility, but it is necessary to provide funding for rolling stock modernisation and replacement programs. It is also necessary to invest in infrastructure aimed at the needs of people with disabilities and eliminate architectural barriers in the form of footbridges or underpasses.

To a small extent, funds planned for railroads (E2.1.1) may contribute to reducing the scale of transport exclusion. They will be used, among other things, to reactivate passenger traffic on line 104 Chabówka - Nowy Sącz as part of the Podłęże - Piekietko project³², where traffic was suspended in 2003³³. However, the improvement in the situation of passengers travelling locally here is only an additional positive effect of the implementation of investments of national importance.

However, the NRP lacked the most important possible action to reduce transport exclusion - explicit reform of the dysfunctional system of responsibility for organising public mass transport in areas other than strictly urban, mainly rural and suburban areas, along with reform of the long-term funding framework beyond the Bus Service Development Fund. It is the reform of the Act on Public Transport that consolidates and strengthens the powers of transport organisers, together with the unification of statutory reliefs between public transport and rail transport, that could constitute reforms that lead to a significant change in the short term³⁴.

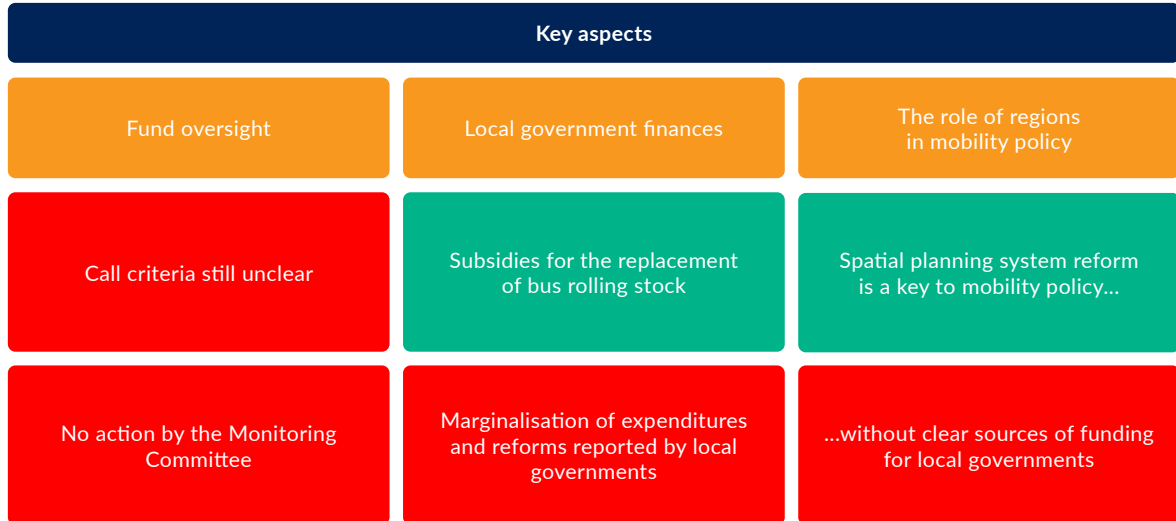
Intervention area

The intervention area criterion includes a division into cross-activities covering the economy or society in general, projects that affect the needs of agglomerations, large cities and their functional areas. The transport situation in rural areas needs to be addressed separately. Determinants of sustainable policies require that special consideration is given to the needs of rural areas and smaller centres and that the impact of investments and reforms on the phenomenon of transport exclusion is assessed.

32 Polish Radio (May 2023). [Ruszają inwestycje z KPO na kolei. Pierwsza umowa PKP PLK w tym tygodniu.](#)

33 Atlas Kolejowy. <https://www.atlaskolejowy.net/infra/?id=linia&poz=83>, accessed on: 15 May 2023.

34 More information on the necessary changes in the organisation of public transport can be found in the following publication: Chrzanowski, P., Fabiszewska-Solares, J., & Krawiec, K. (2022). [Bilet w nieznane. Czy wprowadzenie polskiego odpowiednika „9-euro-ticket” ma sens? WiseEuropa.](#)



The NRP is a collection of projects of statewide importance, which takes the needs of the regions to a small extent only. The way the funds are distributed and the nature of the projects are in line with the centralist tendencies in the implementation of public policies that could be observed in recent years in Poland. Therefore, only a few projects specifically take into account the local government perspective or local challenges.

In NRP, the privilege of the government level and the marginalisation of the local government sector are noticeable. Funds for local governments are largely planned as loans (tram and rail rolling stock)³⁵. It is the inability of local governments to continue to incur further debts that should be indicated as the reason for the need to abandon the loan-based mode of support for the purchase of rolling stock by local governments in the revision.

Ensuring fair representation of each region in the allocation of resources depends on the quality of the oversight process. However, assumptions about the way oversight is carried out remain far from desirable. The Monitoring Committee for the implementation of the NRP did not meet until May 2023, despite the start of the initial implementation of projects. So it is still unknown how reliable the process of evaluating the effectiveness of spending will be³⁶. In terms of a transparent oversight and audit system or local government participation, it is worth citing good practices from other countries, as outlined in the WiseEurope report, entitled “Gonitwa za czasem. Dobre praktyki wdrażania a Krajowy Plan Odbudowy w Polsce [Chasing Time: Good Implementation Practices vs. the National Recovery Plan in Poland]”. Given the past deficits of social dialogue in the government’s strategic projects, the marginalisation of the role of local governments in decision-making can be expected.

35 Associations of Polish Cities. (2021), [Stanowisko ZMP dotyczące nowej wersji KPO, zaprezentowanej 28 kwietnia 2021 roku](#),

36 Piekarski, M. (4 May 2023). [Jest przełom. Wiemy, kiedy zbierze się Komitet Monitorujący KPO](#), RMF24.pl.

6. How have other EU member states planned their mobility spending in their recovery plans?

Sustainable mobility projects remain one of the most important areas of member state intervention planned under the facility. The Polish National Recovery Plan was in line with trends³⁷ present in analogous documents attaching relatively big importance to rail transport.

In addition to rolling stock or infrastructure projects, in selected countries, the plans indicate structural reforms. In Greece it is the reorganisation of the railroad sector, in France: the transfer of competencies for the management of local rail connections to the regions. A significant part of the plans, as in the case of Poland, included reforms related to improving the mechanism for developing Sustainable Urban Mobility Plans (SUMPs).

Investment in public transport remains an important thread in the documents. Countries have planned extensions of subway networks and tram lines and electrification of public transport fleets. One of the most interesting reforms planned is the implementation of a unified fare system for all public transport in Slovakia as part of legislative amendments to the Act on Passenger Transport³⁸. Slovenia has planned to create a unified organiser³⁹ of a public transport system with extended powers to integrate rail, public transport along with suburban and school transport. Portugal also undertakes a reform to strengthen the role and powers of public transport organizers⁴⁰. To speed up the significant rail infrastructure investments planned in the recovery plan, Italy has planned to reform the way rail investments are processed between the national infrastructure manager and the ministry, and shorten the approval process (from 11 to 6 months). Austria simplifies its ticketing system by creating a common ticket platform covering rail and other types of public transport. This is accompanied by the introduction of a so-called climate ticket.

In terms of individual car transport, as many as five countries have planned a support system for phasing out the oldest vehicles. Legislative facilitation of electric vehicle charging stations remains a dominant theme in reforms related to this area. Almost all countries have included comprehensive support systems for the development of alternative fuel infrastructure. Also

37 Pape, M. (2022). [Transport trends in national recovery and resilience plans, EPRS | European Parliamentary Research Service.](#)

38 RTV Spravy. (14 April 2023). [Jeden lístok na všetky druhy verejnej dopravy. Novinka v cestovaní by mohla začať platiť od 2025.](#)

39 Ministrstvo za infrastrukturo. (12 April 2022). [V Državnem zboru sprejet Zakon o upravljanju javnega potniškega prometa.](#)

40 European Commission (2022). [Recovery and resilience scoreboard thematic analysis: sustainable mobility.](#)



outside Poland, a significant part of the planned reforms was changes that made the tax burden dependent on the level of vehicle emissions.

The draft plans included bicycle-related projects. Belgium allocated as much as 6.9% of its Recovery Plan funds for creating 180 km of new cycle lanes and modernising 1,360 km of existing ones as well as for protected bicycle parking spots. Romania and Italy also had ambitious plans in this regard. Slovakia and Latvia have chosen to invest in bicycle transport too. The Czech NRP, in turn, includes co-financing for company electric bicycles. Such projects were missing from the Polish equivalent of this document.

From a review of the plans, one can conclude that the recovery plans have been the impetus for accelerating trends toward sustainable mobility in the countries' current transport policies. As in the National Recovery Plan, through a milestone-based structure, countries have been effectively encouraged to accelerate reforms in the transport sector.

7. Conclusions

The fate of the NRP funds is still unknown. However, if an agreement is reached and these funds are obtained, the need to spend the funds quickly enough will negatively affect the quality of ongoing projects and prevent the implementation of some projects - especially those of an infrastructural nature. The National Recovery Plan in the area of transport is a set of reforms and investments that would happen regardless of the crisis related to the COVID-19 pandemic or the war in Ukraine. To a large extent, it is a collection of long-standing needs of the transport sector and the assignment of existing projects to new funding sources.

Revisions to the plan proposed in April 2023 postpone and reduce the scope of its ambitions. Although at the level of directions, the NRP sets the right goals for the recovery and transformation of the transport sector, there is no clear basis for concluding that the right solutions to the diagnosed challenges have been selected. In many cases, when reading the plan, one gets the impression that it was the challenges that were matched to the solutions adopted in advance. It is difficult to demonstrate in the NRP the correct diagnosis-solution sequence for strategic documents.

Poland's transport policy is an attempt to combine declarative decarbonisation with the actual increase in the importance of high-carbon modes of moving people and goods. The limited scale of funds allocated to sustainable transport makes it necessary to follow the logic of cost-benefit analysis. In the absence of clear criteria and limited public consultation on the plan, there is no certainty that further rolling stock and investment projects are the most efficient allocation of funds.

Evaluation studies⁴¹ on the spending of European funds clearly indicate that it is necessary to change the way investments are planned. Their effects cannot be measured solely in terms of the number of vehicles or kilometres of infrastructure built - without a proper systemic superstructure and evaluation of efficiency and quality, such measures will not be entirely effective.

Projects related to comprehensive system management were clearly absent from the NRP. Although the phenomena requiring comprehensive solutions are well diagnosed in strategic documents at the national level, the consistent focus on projects and reforms of limited comprehensiveness shows an actual lack of will to make deep changes. One of the few projects requiring the involvement of multiple actors and introducing a new quality, i.e. the creation of an integrated ticketing system on the railroad, has been removed. It is worth recalling here that this project was already attempted before the KPO, also unsuccessfully. In this perspective, Poland is missing an opportunity to make a qualitative leap in transport policy with the NRP funds. Because of its focus on transport initiatives with government ownership control, the plan lacked room for more local bicycle projects, accessibility issues, or a broader coverage of individual transport transformation.

41 Wolański M. (2017), Efekty transportowe inwestycji wspartych w ramach NSRO 2007-2013.



The National Recovery Plan may help counteract the energy crisis and move toward climate-neutral mobility - but its principles were definitely not written with deep change in the transport sector in mind. The justifications for the 2023 amendments indicate that the changes necessary for the green transition are not among the priorities, and the planned investments will not have a major impact on Poland's transport system. On the other hand, the National Recovery Plan has forced the planning of politically difficult reforms (e.g. emission-related taxes or the expansion of the road toll system) that probably would not have been included in policies without a clear push from the European Union.

Despite these shortcomings, it would be regrettable not to take advantage of this opportunity to develop good trends in strengthening low- and zero-carbon transport, such as the purchase of bus (E1.1.2) and rail rolling stocks (E2.1.2), intermodal projects (E2.1.3), or the reform of the Bus Service Development Fund itself. The next such opportunity is unlikely to come too soon.



WiseEuropa

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Sustainable Transport Program

In 2022 at WiseEuropa, we began the intensive development of the Sustainable Transport Program, intending to join as a think tank in the public debate on such important issues as new mobility or counteracting transport exclusion. The program pays special attention to issues related to the interdisciplinary issue of urban and non-urban mobility. As a think-tank, we use a broad spectrum of our own analytical capabilities - seeking, analysing and recommending solutions that contribute to the development of sustainable transport in Poland and Europe. Our organisation has unique analytical expertise in many areas. These include European policies, including transport, climate and energy, which allows us to look at the problems of the transport sector in a holistic way.



SUSTAINABLE TRANSPORT

Other publications:

"Blocked potential. How to use the European Green Deal and the fit for 55 as an opportunity to transform the building and transport sectors at the local level",

Chrzanowski P., Fabiszewska-Solares J., Lewandowski W., Marszał K.; WiseEuropa, Warsaw 2022

"Coal's Swan Song. Systemic risks of delaying the restructuring of the mining and coal energy sectors in Poland",
Bukowski M.; WiseEuropa, Warsaw 2022

"The Necessary Step. The impact of mining restructuring on the economy and energy security",
Bukowski M., Śniegocki A.; WiseEuropa 2022