HEAL position on the draft Polish national recovery plan

The Health and Environment Alliance (HEAL) is a leading European not-for-profit organisation working for better health through a healthier environment, bringing together over 90 member organisations from across the European region.

The COVID-19 pandemic has exposed the vulnerability of our health, our healthcare systems and our societies, and the need to ensure greater resilience.

From the very beginning of the pandemic, HEAL and many other health organisations and individuals have been calling for a healthy, green and just recovery; for the financing of measures and activities that will achieve the shift from a polluting to a green economy with guaranteed health benefits for people including longer lives, less asthma attacks, stroke and cancer (1).

**URGENT ACTION ON TACKLING THE ENVIRONMENTAL AND CLIMATE BURDEN OF DISEASE IS NEEDED MORE THAN EVER, AND NEEDS TO BE CENTRAL TO THE POLISH GOVERNMENT’S RECOVERY PLAN AND INVESTMENTS.**

Already before the pandemic, Poland and the other EU countries were faced with the twin crises of climate change and environmental pollution. Poor air quality in Poland leads to 50,000 premature deaths annually (2), and the health effects of climate change have also been increasingly felt, e.g. heatwaves or the spread of vector-borne disease. It is estimated that climate change leads to health costs for Poland of up to 119 billion zloty for 2021-2030, from hospitalisations or lost working days (3).

Concern among the Polish health sector on air pollution and climate change has grown, leading to the adoption of the first ever statement on this matter. “Doctors for Climate” call on all decision-makers to take action to reduce CO2 emissions and environmental pollution (4). Their recommendations should also be considered for recovery measures.

HEAL considers that the draft Polish plan needs considerable strengthening in order to achieve better health, especially regarding climate neutrality, a phase out of fossil fuels and tackling environment and climate related threats to health.

HEAL is submitting comments to the draft national recovery plan as it was presented on 26 February (5).

The plan includes the following priority areas: 1. Resilience and competitiveness of the economy (18.7 billion Polish zloty), 2. Green energy and reduction of energy intensity (27.4 billion Polish zloty), 3. Digital transformation (13.7 Polish zloty), 4. Effectiveness, availability and quality of the health care system (19.2 Polish zloty), 5. Green, intelligent mobility (28.6 billion Polish zloty).

The public consultation period ends 2 April 2021, and the government has to submit the plan by end of April to the EU Commission, in order to access funds under the EU’s Resilience and Recovery Facility (6). With 23 billion EUR, Poland is set to receive the fourth largest share of funding from the RRF.

HEAL has presented these health recommendations in public hearings on 24 and 29 March, and submitted joint NGO comments facilitated by the Polish Green Network.
**RECOVERY ACTION BASED ON THE DO NO HARM PRINCIPLE**

The regulation on the Recovery and Resilience Facility states that no measure in the national recovery plan should lead to significant harm as defined under the EU’s green financing scheme (taxonomy regulation).

In February 2021, the EU Commission published a technical guidance (7) on how this principle should be applied. In their national recovery plans member states have to assess each measure to prevent that significant harm is caused, regarding:

- Climate mitigation,
- Climate change adaptation
- Sustainable use and protection of water and marine resources
- Circular economy, including waste prevention and recycling
- Pollution prevention and control
- Protection and restoration of biodiversity and ecosystems

A measure is deemed compliant with the principle when it is in line with one of the six objectives defined. At the same time, member states have to demonstrate that the measure then doesn’t lead to significant harm in the other areas. Member states also have to check on the direct and primary indirect impact of a measure, as well as assess the life cycle.

For the power and heat sector, while stating that in principle fossil fuel use cannot be funded, the EU unfortunately provides for a loophole for the use of gas, for those member states that face “significant challenges” in decarbonisation.

HEAL and many others are concerned of the capacity of the Polish government and the EU Commission to assess all measures foreseen, which could lead to the approval of financing for a measure that will ultimately lead to harm.

**WHO MANIFESTO FOR A HEALTHY RECOVERY FROM COVID-19**

Already in 2020, the World Health Organization has issued a prescription (8), with the understanding that the investments and policy decisions that governments make have the potential to shape our way of life, economy and consumption for years to come. In the recommendations, WHO underlines that decisions made in the coming months can either “lock in” economic development patterns that will do permanent and escalating damage patterns to the ecological systems that sustain all human health and livelihoods, or, if wisely taken, can promote a healthier, fairer, and greener world.

For a healthier world, WHO recommends the following:

1) Protect and preserve the source of human health: Nature.
2) Invest in essential services, from water and sanitation to clean energy in healthcare facilities.
3) Ensure a quick healthy energy transition.
4) Promote healthy, sustainable food systems.
5) Build healthy, liveable cities.
6) Stop using taxpayers money to fund pollution.

These recommendations are then further detailed in dozens of actionables.

“Like never before, people’s health is under threat from environmental pollution and climate change. With the recovery plan, the Polish government has a unique opportunity to set course from a polluting to a green economy, with immediate and lasting health benefits. This means decision-makers need to significantly up the climate commitments in the plan. “

Weronika Michalak – HEAL Poland Director
IN ORDER TO STRENGTHEN THE HEALTH OF PEOPLE IN POLAND AND BEYOND, HEAL RECOMMENDS THE FOLLOWING FOR POLISH RECOVERY MEASURES AND INVESTMENTS:

Essential changes:
✓ Include and make public an assessment of the health cost and benefits of any recovery measures and financing, and prioritise those measures with the greatest win for health, the climate and clean air
✓ Commit to a coal phase out by 2030
✓ Exclude replacement schemes for merely upgrading coal, not ending its use, in households as part of the Clean Air program

Additionally, HEAL calls on the Polish government to:
✓ Ensure compliance with the EU Green Deal and the commitments enshrined, including the zero pollution ambition and the do no harm principle
✓ Include the goal of climate neutrality by 2050 at the latest (according to the science, 2040 is necessary) and draft a strategy to achieve this for all sectors
✓ Commit to an EU target of -65% GHG emission reduction for 2030
✓ Commit to a phase out of all subsidies for fossil fuels, to avoid lock-in effects
✓ Prioritise decentralised energy generation and projects
✓ Promote and incentivise walking & cycling in cities as part of green mobility
✓ Encourage the update of environmental, climate science and issues in the medical curriculum and trainings for health professionals, and including climate-related diseases in medical nomenclature
✓ Provide for transparency in the selection of projects (ambiguous, objective criteria) and monitor the implementation of the plan

REFERENCES:
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The Health and Environment Alliance (HEAL) is the leading not-for-profit organisation addressing how the environment affects human health in the European Union (EU) and beyond. HEAL works to shape laws and policies that promote planetary and human health and protect those most affected by pollution, and raise awareness on the benefits of environmental action for health.

HEAL’s over 90 member organisations include international, European, national and local groups of health professionals, not-for-profit health insurers, patients, citizens, women, youth, and environmental experts representing over 200 million people across the 53 countries of the WHO European Region.

As an alliance, HEAL brings independent and expert evidence from the health community to EU and global decision-making processes to inspire disease prevention and to promote a toxic-free, low-carbon, fair and healthy future.

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