

July, 2026

Comments to the draft Strategy for the Transformation of Heating Sector by 2040

The table follows the public consultation remarks template. The final column is intentionally left blank for the government response

No.	Submitting entity	Section concerned	Comment	Justification
1	Clean Air Task Force	Chapter 6.1.11 "Nuclear fuel", p. 25	The title of section 6.1.11 should be changed from "Nuclear fuel" to "Nuclear energy in district heating" or "Nuclear heat".	The section does not concern nuclear fuel as such, but the possible use of nuclear energy and nuclear heat in district heating systems. A more precise title would better reflect the content of the section and avoid narrowing the discussion to fuel rather than heat production, system integration and decarbonisation value.
2	Clean Air Task Force	Chapter 6.1.11, p. 25	The Strategy should present nuclear heat as part of a technology-optional approach to district heating decarbonisation. Nuclear heat should be described as one of the possible zero-emission options for selected large and medium district heating systems, rather than only as a long-term supplementary direction.	Polish district heating systems differ significantly in scale, network parameters, heat demand profiles, available local resources and investment capacity. For that reason, the transition should not rely on one dominant technology pathway. Nuclear heat can complement renewables and low-carbon peak sources where a system requires stable, low-carbon heat and where local alternatives are constrained. This would also be consistent with the Strategy's emphasis on diversification of heat generation technologies and adaptation to local conditions.
3	Clean Air Task Force	Chapter 6.1.11, p. 25	The Strategy should distinguish between three nuclear heat deployment models: heat from large nuclear power plants operating in cogeneration mode, SMRs operating in cogeneration mode, and SMRs designed exclusively for heat production.	The current text refers to large reactors, SMRs but does not clearly separate different deployment models. These models have different technical and economics characteristics. Feasibility of delivering heat from large nuclear power plants depends primarily on plant location, presence of heat networks in nearby towns/cities and proximity between both. SMR cogeneration depends on both stable heat offtake and electricity market conditions. Heat-only SMRs should be assessed separately because heat is their primary output, not a by-product of electricity generation hence there is less flexibility in the final energy vector.
4	Clean Air Task Force	Chapter 6.1.11, pp. 25–26	The Strategy should avoid framing nuclear heat only through the category of waste heat from electricity generation. Waste heat is well below water parameters in a typical DH system. It should also recognise standalone nuclear heat sources, including heat-only SMRs, as a separate option for district heating systems.	The current wording focuses on the recognition of heat from nuclear power plants as waste heat. In practice waste heat is well below water parameters needed in a typical DH system. Hence any heat siphoned off for DH system will impact the amount of electricity produced by the plant. This is relevant for large nuclear power plants and nuclear cogeneration, but it does not fully address SMRs designed exclusively for heat production. In heat-only SMRs, heat is not a by-product of electricity generation, but the primary output of the installation. If future regulatory measures are designed only around waste heat or cogeneration, heat-only

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				SMRs may remain outside the practical implementation framework despite their potential relevance for selected district heating systems.
5	Clean Air Task Force	Chapter 6.1.11, p. 25; Chapter 8 "Local energy planning", p. 27	The Strategy should indicate that the potential use of nuclear heat should be assessed through local feasibility screening for large and selected medium district heating systems.	Nuclear heat is not suitable for every district heating system. Its relevance depends on local heat demand, load profile, network temperature, possible source location, distance to consumers, available land, existing assets, potential network expansion and alternative low-carbon options. Local screening would help municipalities and district heating companies identify where nuclear heat merits deeper analysis and where other technologies are more appropriate. This would avoid both premature exclusion of nuclear heat and premature selection of specific locations. Such assessment should also help distinguish systems where new low-carbon heat sources are justified from areas where demand reduction, energy efficiency or individual solutions may be more rational.
6	Clean Air Task Force	Chapter 6.1.11, p. 25; Chapter 9, p. 29	The Strategy should add that the integration of nuclear heat requires assessment of heat transport distance, network parameters and possible network modernisation.	The economics of nuclear heat depend its integration with the existing network. Large nuclear power plants may be located far from heat demand centres, while heat-only SMRs could be sited closer to consumers if safety, licensing and local conditions allow. The Strategy should therefore link the nuclear heat section with infrastructure needs and economic assessment of heat costs from various sources.
7	Clean Air Task Force	Chapter 5, pp. 9–10; Chapter 13.1 "Legal regulations", p. 50	The Strategy should support implementation of the emissions-based alternative pathway for recognising efficient district heating systems under Article 26 of the Energy Efficiency Directive (EED).	Current criteria based mainly on shares of renewable energy, waste heat and high-efficiency cogeneration may not adequately capture the decarbonisation value of nuclear heat, especially heat-only SMRs. An emissions-based pathway, envisioned in the EED, would allow systems using zero-emission nuclear heat to be assessed according to their actual emissions performance. This would be more technology-neutral and would reduce the risk that low-carbon heat sources are excluded from efficient district heating status only because they do not fit existing technology categories.
8	Clean Air Task Force	Chapter 6.1.11, pp. 25–26; Chapter 13.1, p. 50	The Strategy should clarify that work on recognising heat from nuclear power plants as waste heat should not be the only regulatory pathway for nuclear heat. The Strategy should also call for a separate assessment of how heat-only SMRs could contribute to efficient district heating criteria.	The Strategy proposes seeking recognition of heat from nuclear power plants as waste heat. This may help nuclear cogeneration and large nuclear plants, but it does not solve the regulatory treatment of heat-only SMRs. A broader approach is needed to ensure that the legal framework captures both secondary heat from electricity generation and nuclear installations whose primary product is heat.
9	Clean Air Task Force	Chapter 12 "Financing", p. 36; Chapter 13.2 "Investment support and technological	The Strategy should include support for pre-investment work for potential nuclear heat projects, including screening studies, pre-feasibility studies, FEED studies, network integration analysis and heat demand modelling.	First nuclear heat projects, especially SMRs, will face higher development risk, regulatory uncertainty and financing costs. Municipalities and district heating companies often do not have sufficient resources to carry out detailed technology-neutral assessments of nuclear heat against other decarbonisation options. Public support should therefore first reduce the cost and risk of project preparation before any decision on investment support is made. Such support should also be contingent on an assessment of the project's long-term public value. Since public money would be used to reduce early-stage risks, the assessment should

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		development", p. 60		demonstrate that the project can deliver benefits for consumers and local heating systems, particularly through durable affordability, security of supply, and emissions reductions.
10	Clean Air Task Force	Chapter 12, p. 36	Financing instruments for nuclear heat should cover the full system cost, not only the nuclear heat source.	The cost of a nuclear heat project includes not only the reactor or nuclear installation, but also heat extraction systems, heat exchangers, heat transport infrastructure, connection to the district heating network, backup and peak capacity, and potentially network modernisation. Excluding these elements from the financing framework would make project economics incomplete and could prevent technically justified projects from becoming bankable. First-of-a-kind SMR heat projects will require a dedicated risk-sharing mechanism, including cost stabilisation tools, guarantees or blended public-private financing, to reduce construction, delay and financing risk.
11	Clean Air Task Force	Chapter 13.1 "Legal regulations", p. 50	The Strategy should identify the need to review Polish nuclear and energy law in relation to SMRs used in district heating, including licensing, siting, emergency planning zones and interaction with heat market regulation.	Polish law allows nuclear facilities to generate electricity or heat, but the existing nuclear investment and licensing framework was designed primarily for large nuclear power plants. SMRs used in district heating may require a proportionate, technology-informed application of licensing and siting requirements, without lowering nuclear safety standards. Clear coordination will also be needed between nuclear safety regulation, heat market regulation and local energy planning.
12	Clean Air Task Force	Chapter 13.2, p. 60	The Strategy should state that heat-only SMRs are a post-2035 option	Heat-only SMRs may become relevant for selected Polish district heating systems, but commercial deployment remains less mature than established nuclear cogeneration in large nuclear heat applications. The Strategy should therefore treat them as a long-term option that requires preparatory work now: monitoring demonstration projects, developing regulatory readiness, supporting feasibility studies and designing financing tools.
13	Clean Air Task Force	Chapter 8, p. 27; Chapter 13.3, p. 66	The Strategy should include targeted educational and analytical tools for municipalities and district heating companies on nuclear heat.	Decisions on district heating transformation are made locally and depend on specific network conditions. Social acceptance should therefore not be limited to general communication about nuclear energy. Local authorities and municipal heating companies need practical tools to compare nuclear heat with other options in terms of system costs, safety requirements, infrastructure needs, tariff impacts and long-term security of supply. Public engagement should start before formal administrative procedures begin. It should concern the specific use of nuclear energy in a given district heating system, not only general attitudes towards nuclear energy.
14	Clean Air Task Force	Chapter 14 "Implementation on system", p. 67	The implementation system should ensure coordination on nuclear heat among the Ministry of Energy, the Ministry of Climate and Environment, the President of the Energy Regulatory Office, the National Atomic Energy Agency and local governments..	Nuclear heat sits at the intersection of nuclear policy, heat regulation, local energy planning, financing and nuclear safety oversight. Without a clear coordination mechanism, the Strategy may recognise nuclear heat as an option without creating a practical implementation pathway. Coordination is needed to define needed regulatory changes, financing tools and the role of local authorities and district heating companies.

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15	Clean Air Task Force	Chapter 6.1.11, p. 25; Chapter 13.2, p. 60	The Strategy should present nuclear heat as complementary to renewables, not as a competing pathway. Strategy defines that RES share in heating will be 52% by 2040 therefore a clear pathway for all other low-carbon solutions resulting in other 48% should be defined.	Large and medium district heating systems will likely need portfolios of clean technologies. Nuclear heat could provide stable, low-carbon heat, while renewables, Power-to-Heat, waste heat and storage can provide flexibility and system optimisation. This framing would align nuclear heat with the Strategy's broader objective of diversified, locally adapted and cost-conscious district heating decarbonisation.
16	Clean Air Task Force	Chapter 6.1.9 "Renewable and decarbonised gases", pp. 23–24; Chapter 13.2, Action 12, p. 56	The Strategy should reconsider the role of renewable hydrogen in district heating. Renewable hydrogen should not be positioned as a general decarbonisation solution for district heating. Instead, the Strategy should clarify that clean hydrogen due to its scarcity, must be prioritised for sectors where direct electrification or other efficient decarbonisation options are not viable. The Strategy should also distinguish between biomethane, biogas, and renewable hydrogen, as these fuels differ significantly in availability, infrastructure needs, conversion losses, costs, and priority applications. The Strategy should remove the fragment referring to the use of renewable hydrogen in district heating	Renewable hydrogen production requires large amounts of electricity produced from RES and involves significant conversion losses. Using renewable electricity directly through heat pumps or in district heating networks is more efficient than converting it into hydrogen and then using the hydrogen for heat. Independent evidence reviews show that hydrogen for space and water heating is less economical, less efficient, more resource-intensive, and associated with higher environmental impacts than alternatives such as heat pumps, solar thermal. While clean hydrogen (hydrogen produced with low lifecycle greenhouse gas emissions) has some role in decarbonising industry sectors, the evidence does not support its widespread use for residential heating. This is particularly relevant for Poland, where domestic renewable hydrogen supply will be constrained by limited availability of renewable electricity and competing demand from sectors with fewer viable alternatives. Public policy should therefore avoid creating demand for renewable hydrogen in residential applications where more efficient options exist. Prioritising hydrogen for no-regrets sectors would reduce the risk of distorting the emerging clean hydrogen market, protect limited supplies for industrial users that need hydrogen most, and reduce the risk of locking district heating companies into expensive and inefficient fuel pathways. National policies should not create new demand for renewable hydrogen before there has been a significant build-out of clean electricity, so that scarce renewable power is not diverted away from the more urgent task of decarbonising Poland's highly carbon-intensive electricity grid. Suggested sources: Clean Air Task Force. (2023). Hydrogen for decarbonization: A realistic assessment. https://www.catf.us/resource/hydrogen-decarbonization-realistic-assessment/; Rosenow, J. (2022). Is heating homes with hydrogen all but a pipe dream? An evidence review. Joule, 6(10), 2225–2228. https://doi.org/10.1016/j.joule.2022.08.015 Gomersall, J., & Carr, A. (2025, October 20). <i>Getting hydrogen right for Poland's industrial decarbonisation</i>. Clean Air Task Force. https://www.catf.us/resource/getting-hydrogen-right-for-polands-industrial-decarbonisation/

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				Clean Air Task Force. (2024). <i>Europe needs clean hydrogen – and a reality check on the policies to deliver it</i> . https://www.catf.us/resource/europe-needs-clean-hydrogen-reality-check-policies-deliver/
17	Clean Air Task Force	Chapter 6.1.8 “Geothermal energy”, pp. 22–23; Chapter 12 “Financing”, p. 36; Chapter 13.2, p. 60	The Strategy should strengthen the geothermal section by adding a dedicated de-risking and innovation framework for geothermal heat. This should include coordinated geothermal data aggregation and mapping, wider access to publicly held subsurface information for municipalities and district heating companies, risk-sharing instruments for first wells, and targeted support for next-generation geothermal technologies. The Ministry should identify R&D on next generation geothermal and present funding opportunities, as funding support is essential for the development of this new technology. These could include national funds as well as EU funding sources such as Horizon Europe for early-stage research and Innovation Fund support for pilot projects. The Strategy should also indicate how national and EU funding streams can be coordinated, so that projects can move from research and resource assessment to demonstration and deployment without falling between separate funding instruments. Greater emphasis on next generation geothermal energy is needed within the R&D section, with a focus on targeted research funding.	The Strategy recognises geothermal energy as a stable, local and year-round heat source, and notes the importance of geological conditions and first-well risk. However, the document does not yet define the institutional and financial tools needed to reduce exploration risk and bring new geothermal technologies to demonstration stage. A stronger data and de-risking framework would improve project visibility for municipalities and investors, lower entry barriers, and support better local energy planning. This would be consistent with the Strategy’s focus on locally available resources, diversification of heat generation technologies and efficient use of public funding. Suggested sources: Clean Air Task Force. (2022). <i>Superhot rock energy: A vision for firm, global zero-carbon energy</i>. https://www.catf.us/resource/superhot-rock-energy-a-vision-for-firm-global-zero-carbon-energy/ Hill, J. (2025). <i>A technology road map for next-generation geothermal: Unlocking superhot rock innovation through strategic collaboration</i>. Clean Air Task Force. https://www.catf.us/wp-content/uploads/2025/09/CATF_SHRTechRoapMapReport_Digital_09.18.25.pdf
18	Clean Air Task Force	Chapter 6.1.8, pp. 22–23; Chapter 13.1 “Legal regulations”, p. 50	The Strategy should call for a review of permitting, licensing and public-law charges applicable to geothermal projects in Poland, with the objective of reducing unnecessary administrative delays and avoiding fee structures that discourage efficient heat production. The Strategy should also call for harmonisation of geothermal-related provisions dispersed across different legal acts and for faster access to information generated by recent exploration and research activities, subject to appropriate confidentiality rules.	Any duplication of administrative steps, unclear procedures or poorly designed public charges can increase geothermal project risk and cost of capital. The Strategy should not prescribe detailed legal amendments without further analysis, but it should identify the need to assess whether the current framework for geothermal exploration, drilling, resource use and data disclosure is fit for accelerated district heating deployment. The review should also consider whether fees and charges reflect useful energy output rather than only extracted volumes, especially where lower-temperature resources require higher flow rates to deliver the same amount of heat.

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19	Clean Air Task Force	Chapter 6.1.8, pp. 22–23; Chapter 12, p. 36; Chapter 13.2, p. 60	The Strategy should include measures to reduce drilling costs and early-stage financial risks for geothermal projects, including public risk-sharing for first wells and assessment of the potential reuse of existing geological and hydrocarbon infrastructure, where technically and legally feasible. The Strategy should add a dedicated geothermal support package covering project de-risking, non-public financing, specialist technical support, legal coordination and faster access to updated resource data. This should include consideration of a drilling-risk insurance fund for geothermal projects, the use of public-private partnership models and private financing where appropriate, and the creation of a shared specialist research, technology and service base for municipalities, operators, designers and geothermal companies.	The first drilling phase is one of the main risk drivers for geothermal heat projects. Public risk-sharing instruments, including drilling risk insurance or partial guarantees in areas with high geothermal potential, could reduce the weighted average cost of capital and improve the expected value of projects. The Strategy should also encourage mapping of existing wells, subsurface data and infrastructure that may support geothermal development or research. This should be done cautiously and subject to safety, environmental and legal assessment, but it could reduce costs and support both conventional and next-generation geothermal applications. A dedicated risk insurance or guarantee mechanism, building on earlier Polish and EU-level work on geothermal risk insurance, could reduce early-stage risk and improve access to finance. Public funding will remain important, but the Strategy should also open a pathway for private capital and PPP models, especially where geothermal projects can support long-term heat supply for district heating systems.
20	Clean Air Task Force	Chapter 6.1.8, pp. 22–23; Chapter 13.2, p. 60	The Strategy should broaden the geothermal section by recognising Superhot Rock energy as an emerging geothermal technology that merits targeted R&D and demonstration support. The Strategy should identify Superhot Rock energy as a long-term innovation pathway within the geothermal portfolio and include it among technologies eligible for research, development and demonstration support.	Superhot Rock technology aims to access superheated geothermal resources that can deliver significantly higher energy output than conventional geothermal systems. It remains an emerging technology and should not be treated as a near-term replacement for mature heat sources. However, excluding it from the Strategy risks narrowing Poland's innovation agenda in a field that could support long-term decarbonisation, energy security and technology optionality. Funding opportunities should be identified through national R&D instruments and relevant EU programmes, including Horizon Europe for early-stage research and the Innovation Fund for pilot and demonstration projects. Hill, J. (2025). <i>A technology road map for next-generation geothermal: Unlocking superhot rock innovation through strategic collaboration</i>. Clean Air Task Force. https://www.catf.us/wp-content/uploads/2025/09/CATF_SHRTechRoapMapReport_Digital_09.18.25.pdf Clean Air Task Force. (2025). <i>Investing in innovation: Unlocking the full potential of geothermal energy in Central and Eastern Europe</i>. https://cdn.catf.us/wp-content/uploads/2025/07/02102439/shr-cee-fact-sheet.pdf
21	Clean Air Task Force	Chapter 6.1.8 “Geothermal energy”, pp. 22–23	The Strategy should promote planning measures for high-temperature geothermal heat and power projects, including next-generation geothermal technologies. Since the Strategy recognises the need for stronger integration between the electricity sector and district heating, it should also identify geothermal projects that can produce electricity and	High-temperature geothermal resources, including Superhot Rock energy, could provide dispatchable clean energy and strengthen the integration of the electricity and heating sectors. Geothermal innovation can unlock domestic energy resources beyond traditional geothermal areas, provide 24/7 clean power, and enable cascading use of heat after electricity generation, including for district heating, cooling, and agriculture. This improves system efficiency and increases the value of each geothermal project. Technology progress may also reduce project costs over time, create technical jobs and support significant

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			then use residual high-temperature heat in district heating systems. This cascading use of geothermal energy could maximise both economic and climate benefits by combining baseload clean power generation with local clean heat supply. The Strategy should therefore support feasibility studies, local heat planning, and demonstration projects for combined geothermal power and heat applications, where geological conditions and system needs justify such projects.	emissions reductions compared with fossil fuel-based generation. For Poland, where district heating is local, infrastructure-intensive and still heavily dependent on fossil fuels, high-temperature geothermal projects should be assessed as integrated heat-and-power assets that can support both energy security and decarbonisation.
22	Clean Air Task Force	Chapter 6.1.8 "Geothermal energy", pp. 22–23	The Strategy should strengthen the international cooperation and knowledge-transfer dimension of geothermal deployment. This should include alignment of geothermal classification and terminology with international practice, active participation in European geothermal platforms and working groups, and the use of international experience in reservoir management, low-temperature district heating integration and next-generation geothermal technologies.	Geothermal deployment in district heating and electricity sector would benefit from stronger links with international practice. Poland should use European platforms, including ETIP-Geothermal working groups to bring practical experience into national policy and project development. This is relevant for resource management where several operators use the same reservoir or geological structure, and for the integration of geothermal heat into high-temperature district heating networks. The Strategy should also support Polish-language guidance on international practices and research dissemination so that municipalities, operators and local stakeholders can use international experience in project preparation and decision-making. Furthermore, at the EU level, Poland should advocate for establishing a European Geothermal Industry Alliance to fast-track the scale-up of geothermal projects, with a mandate to implement an ambitious action plan and to facilitate industrial success
23	Clean Air Task Force	General comments; Chapter 8 "Local energy planning"; Chapter 13.2 "Investment support and technological development"; Chapter 13.3 "Social education and monitoring"	The Strategy should include a dedicated component on the role of energy communities in district heating decarbonisation, including energy cooperatives and citizen energy communities. Energy communities are currently absent from the draft Strategy, despite the document's strong emphasis on local planning, stakeholder participation, use of local renewable resources and social acceptance. The Strategy should explicitly recognise that community-based energy models can support the decarbonisation of local heat systems, especially where projects are linked to municipal planning, local renewable heat sources, waste heat, geothermal energy, biomass, heat pumps, solar thermal or small-scale heat networks. The Strategy should therefore add a roadmap for the participation of energy communities in heating projects, covering legal, technical and financial conditions for their development. This should include expert support for municipalities, citizens and local entities, access to advisory services on	The omission of energy communities weakens the local dimension of the Strategy. Today, energy communities in Poland develop mainly around electricity generation. In the case of energy cooperatives, this is partly driven by the electricity net-metering mechanism and the 1:0.6 quantitative settlement model, which creates a stronger incentive for electricity projects than for heat projects (RES Act, Article 38c). At the same time, the legal definition of an energy cooperative is broader and already covers the generation, trade and storage of electricity, biogas, agricultural biogas, biomethane or heat in renewable energy installations (RES Act, Article 2 point 33a). This means that the legal basis for energy cooperatives in heating exists, but the Strategy does not create a policy impulse for using it in practice. The problem is even clearer for citizen energy communities. In Polish law, the definition of a citizen energy community does not include heat among the activities that such a community may perform - article 3 point 13f letter c of the Energy Law refers only to electricity-related activities. This approach is inconsistent with the broader concept of renewable energy communities under RED II. Renewable energy communities are not limited to the electricity market: they are entitled to produce, consume, store, share and sell renewable energy and to access suitable energy markets, while RED II separately recognises the role of renewable energy in heating and cooling and in district heating and cooling Articles 2(16) of RED II. The Polish framework therefore narrows the practical potential of citizen energy communities in comparison with the RED II model and does not create a clear route for their participation in renewable heat projects. For this reason, the Strategy should recognise energy communities in district heating decarbonisation. In district heating, they could increase local acceptance of

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			technical, legal and financial issues, and dedicated investment support for heating projects developed by energy cooperatives, citizen energy communities, municipalities or mixed local partnerships.	investment projects, improve cost transparency, retain economic value within municipalities, support the use of local renewable resources and help mobilise citizens, municipalities and local enterprises around concrete heating projects. Without a dedicated component, energy communities will remain in Poland mainly a tool for the electricity market, rather than becoming part of the broader local heat transition.
24	Clean Air Task Force	General comments; Chapter 8 "Local energy planning"; Chapter 12 "Financing the transformation of district heating"; Chapter 13.3 "Social education and monitoring"	The Strategy should examine broader forms of community ownership and community participation in district heating projects, beyond the formal legal categories of energy cooperatives and citizen energy communities. District heating has a strongly local character: heat is produced, transported and consumed within territorially limited systems, depends on local infrastructure, local heat demand, local resources and municipal planning, and directly affects affordability and public acceptance at community level. For this reason, the Strategy should consider models that allow local residents, public institutions and local enterprises to participate in, benefit from, or enter into long-term offtake arrangements for clean heat projects. This could include community heat offtake models, municipal-community partnerships, partial local ownership, benefit-sharing mechanisms and structured participation of local consumers in RES projects	The current draft focuses on local planning and stakeholder participation, but does not analyse ownership and offtake models that could give local communities a more direct role in the heat transition. This is a missed opportunity because district heating is inherently local. Heat systems are closely linked to municipal spatial planning, local building stock, local renewable resources, waste heat potential and the economic situation of local consumers. Community participation should not be only limited to consultation or education, but it may also include financial and contractual models through which local actors share in the benefits of clean heat infrastructure. International experience shows that community ownership and community offtake can allocate benefits, risks and governance rights in different ways. Some models give communities ownership and decision-making rights, while others allow consumers to benefit from a project through long-term access to its output without assuming full investment risk. The Danish experience confirms the relevance of this approach for district heating. In Denmark, consumers own around 280 out of 360 district heating companies, usually with one share per connected dwelling. This model has supported non-profit heat supply, local involvement, long-term investment planning and affordability. It also shows that community-owned district heating requires enabling conditions, including financing for feasibility studies, advisory support, consumer engagement and, where justified, public loan guarantees. The Danish example shows that community ownership should be assessed in the Strategy alongside energy communities, municipal ownership and private investment models. Suggested resources: Clean Air Task Force. (2023). <i>Community ownership of clean energy infrastructure, explained</i>. https://www.catf.us/resource/community-ownership-clean-energy-infrastructure-explained/

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				Jensen, J. T., & Jensen, J. R. (2024). <i>Community-owned district heating networks in Denmark</i> . <i>Hot Cool</i> , 3/2024. https://hotcool.dbdh.dk/view/1004219426/6/
25	Clean Air Task Force	General comments	The Strategy should be supplemented with two structural annexes: Annex A – Executive Summary and Annex B – Operational Roadmap for District Heating Decarbonisation to 2040, with a perspective to 2050. Annex A should provide a concise executive summary of the Strategy, including the current state of Polish district heating, the main challenges, strategic objectives, priority technologies, financing needs, the governance model, and key implementation milestones. Annex B should translate the Strategy into an operational roadmap. It should organise implementation actions by thematic dimensions, for instance: Technologies, Regulation and governance, Financing and affordability, and Society. Each action should define the scope of intervention, the linked strategic objective, the implementation horizon, the lead institution, the supporting institutions, links with other actions, monitoring indicators, and the expected milestone. The Strategy should also ensure alignment between the Heating Strategy and the Polish Nuclear Power Programme, particularly where nuclear heat, SMR cogeneration and heat-only SMRs are considered as possible options for district heating decarbonisation.	The current draft outlines strategic objectives, indicators, technology options, financing sources, and an implementation framework. However, it lacks a clear operational link between policy direction and project delivery. This makes it challenging to prioritise actions, assign institutional responsibilities, understand interactions among reforms, and establish milestones for progress. Given that decarbonising district heating requires coordinated efforts across multiple areas, adding a roadmap annex would help public authorities and other stakeholders implement the Strategy more effectively. It would also enhance accountability by clarifying responsibilities and providing a transparent basis for monitoring progress. The alignment between Nuclear Power Programme and Heating strategy is important because nuclear heat projects would depend on decisions and processes regulated outside the heating sector, including nuclear policy, licensing, siting, safety regulation, public financing and institutional capacity. Without coordination between the Heating Strategy and the Polish Nuclear Power Programme, there is a risk that nuclear heat is recognised in one strategic document but not translated into practical implementation conditions in the other.
26	Clean Air Task Force	Chapter 6.1.11 p. 25	The Ministry' of Energy in its strategy underlines the importance of recognition of nuclear power plants as waste heat by the European Commission.	CATF appreciates the Ministry's recognition that efforts should be made at the European Commission level to classify heat from nuclear power plants as waste heat. However, the organization emphasizes that this issue needs to be raised within the Nuclear Alliance, alongside stronger efforts directed toward the European Commission.