
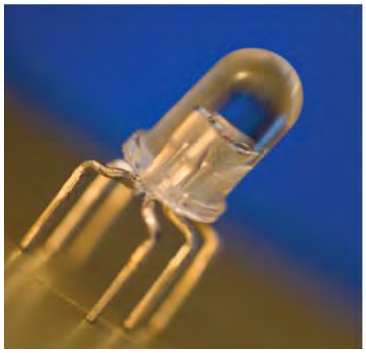


Assessment of climate change policies as part of the European Semester

Country Report Poland

23 January 2015

A report submitted by ICF Consulting Services
in association with

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Contents

1 Short Summary

In Poland, an official energy-specific long-term strategy is specified in the “Polish Energy Policy until 2030” (Polityka Energetyczna Polski do 2030 r.) from 2009. In August 2014, the Polish Ministry of Economy presented the draft of the strategy “Polish Energy Policy until 2050”. The strategy "Energy Security and the Environment - prospect for 2020" („Bezpieczeństwo Energetyczne i Środowisko – perspektywa do 2020 roku”) was adopted in April 2014 by the Council of Ministers. The main goal of the Strategy is to create the conditions for the development of a competitive and efficient energy sector, ensuring sustainable and environment friendly development.

By 2020, Poland can increase its emissions not covered by the EU ETS by 14% compared to 2005, according to the Effort Sharing Decision (ESD). The latest data for 2013 shows that Poland missed its annual allocation interim target under the ESD for the year 2013 by 2.4 percentage. However, national projections indicate that the country will not only meet but exceed its 2020 target by almost 10 percentage points both with existing measures (WEM) and with additional measures (WAM) (EEA 2014a).The key policy developments in the last year (Jan. 2014 – Jan. 2015) include the adoption of a new law on taxing hydrocarbons (Ustawa o specjalnym podatku węglowodorowymi, zmianie ustawy o podatku od wydobycia niektórych kopalin oraz zmianie niektórych innych ustaw – “law on special hydrocarbon tax, tax law changes the minerals extraction and some other laws”), which will introduce taxes on hydrocarbon and minerals extraction. New programmes aiming at support for energy efficiency investments were put into force by the National Fund for Environmental Protection and Water Management. The legislative underpinning regarding the Act on Renewable Energy Sources continued in 2014. It is expected that the draft will be approved by the parliament in the first quarter of 2015 and that the act will come into force in March 2015.

2 Climate and energy policy priorities

The only existing national strategy on environmental policy in Poland was published in 2008 by the Polish Ministry of Environment, the “National Environmental Policy for 2009-2012 with an outlook until 2016”. It names measures for the years 2009-2012 and overall goals for 2016. Thus the country is currently not following a detailed environmental policy plan, as specifics have not been laid out for the years after 2012 (MOS, 2008).

The lack of a specific policy strategy is even more evident when it comes to climate change. The last climate policy strategy, “Polish Climate Policy Strategies to reduce greenhouse gas emissions in Poland until 2020”, was published in 2003. It names three timeframes for goals and measures: 2003-2006, 2007-2012, and the long-term timeframe of 2013-2020. Strategies are increasingly vague the more long-term they are, such that the document has little relevance to Poland’s current climate policy situation and does not provide clear policy guidance. The document has little meaning for the implementation of the EU2020 targets since it has not been updated since its publication and its measures were developed before Poland joined the European Union - new EU directives were developed in the meantime, and the Polish strategy has not been adjusted accordingly (MOS, 2003).

Poland’s official energy-specific long-term strategy, “Polish Energy Policy until 2030” (Polityka Energetyczna Polski do 2030 r.), was published by the Polish Ministry of Economy in November 2009. In August 2014, the Ministry presented the draft of the strategy “Polish Energy Policy until 2050”. The main goals of the plan are: ensuring the energy security of the country, increasing the competitiveness and efficiency of the national economy and reducing the impact of energy on the environment. The document envisages that coal (both hard coal and lignite) will continue to be the main source of energy until 2050 (60%). Other named energy sources are natural gas, renewable energy sources and nuclear power (each with a share of approximately 15-20%) (MG, 2014b).

A resolution on another strategy regarding energy and environmental topics – "Energy Security and the Environment - prospect for 2020" („Bezpieczeństwo Energetyczne i Środowisko – perspektywa do 2020 roku”) – was adopted in April 2014 by the Polish Council of Ministers. The main goal of the strategy is to create the conditions for the development of a competitive and efficient energy sector, taking into account sustainability and environmental aspects. The document lists key challenges for the energy sector including the reduction of energy intensity of the Polish economy through the modernization of power and heat generating plants as well as the diversification of energy generation through introduction of nuclear energy and increasing the use of renewable energy sources. The document also contains plans of the Government to reduce air pollution and to reform the water management system including investments in flood protection (MG, 2014c).

Polish energy policy focuses on a secure, affordable, and diversified energy supply, which has led to the exploration of domestic shale gas resources and the construction of the first nuclear power plant. Energy independence from Russia is a policy priority and one of the reasons for the Polish government’s strong support for the coal industry and its high hopes for shale gas resources. Although “Poland’s Energy Policy up to 2050” lists climate-friendly goals for the energy sector (such as reducing the energy-intensiveness of the economy, construction of highly efficient power plants, promotion of renewables and the reduction of losses during transmission), there is little evidence of those goals being pursued: Renewable energies have played a minor role in recent years, and the planned Renewable Energy Sources Law introducing changes in support Activities for adopting the act have been intensified in recent months though and it is expected to come into force in March 2015. The newly amended support scheme will not be effective until 2016 (reo, 2014).

3 GHG trends and projections

Poland reduced its total GHG emissions by less than 1% between 2005 and 2013, with significant year on year changes in the period. The share of GHG emissions not covered by the European Emission Trading Scheme (EU ETS) is around 48%, which is below the EU28 average (see Table 1).[1]

Table 1 Key data on GHG emissions

		National data				*EU28*
		2005	**2011**	**2012**	**2013**	***2013***
Total GHG emissions	Mt CO_2eq	398.8	405.7	399.3	396.0	4 539
Non-ETS emissions	Share in total emissions	49%	50%	51%	48%	*58%*

Source: EEA 2014a; EEA 2014c

By 2020, Poland can increase its emissions not covered by the EU ETS by 14% compared to 2005, according to the Effort Sharing Decision (ESD). The latest data for 2013 show that Poland missed its annual allocation interim target under the ESD for the year 2013 by 2.4 percentage points (see figures in Table 2). However, national projections indicate that the country will not only meet but exceed its 2020 target by almost 10 percentage points both with existing measures (WEM) and with additional measures (WAM) (EEA 2014a).

Table 2 Non-ETS emission targets, trend and projections

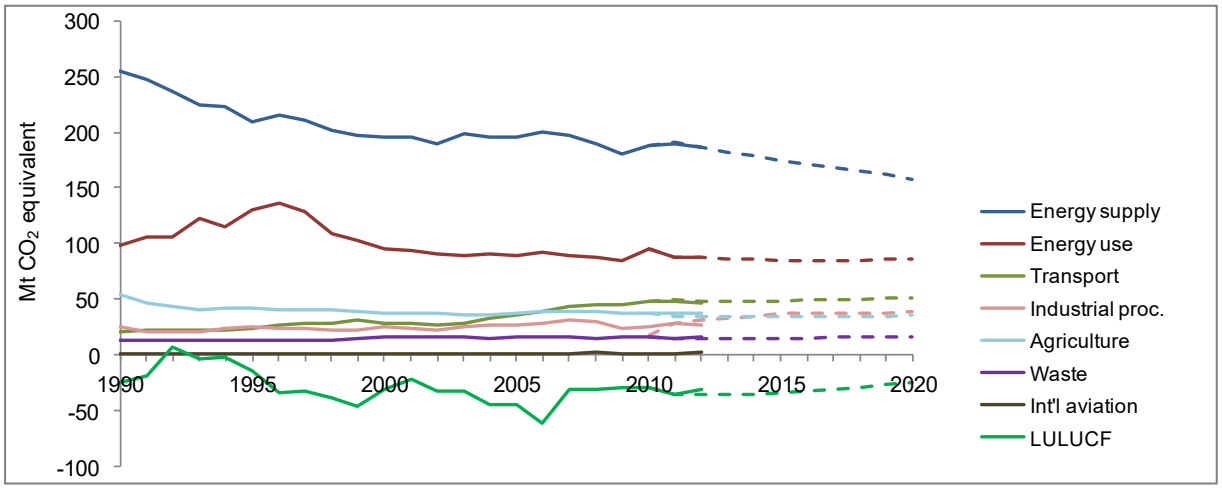
		Compared to base year
2013	ESD interim target	+ 9.1%
	ESD emissions	+ 11.5%
2020	ESD target	+ 14.0%
	ESD projections WEM	+ 4.1%
	ESD projections WAM	+ 4.1%

Source: EEA 2014a. Green indicates target met or exceeded, orange indicates a value below.

GHG emissions are mainly created by the energy industry followed by direct fuel consumption (e.g. households for heat generation) and the transport sector (see figure below for historic and estimated emissions by sector). Projections indicate that emissions from the energy industry will be reduced by 2020, while emissions from direct fuel consumption and transport will remain relatively constant.

[1] The European Environment Agency has developed a complex methodology to measure progress on the Non-ETS/ESD targets of all EU Member States. This report uses the figures derived on this basis. A detailed explanation and the underlying absolute amounts are contained in Annexes 1-3 of the EEA report No 6/2014 “Trends and projections in Europe 2014. Tracking progress towards Europe's climate and energy targets for 2020” available at http://www.eea.europa.eu/publications/trends-and-projections-in-europe-2014/

Figure 1 GHG trends and projections by sector



Source: EEA 2014a

4 Policy development

This section covers significant developments made in key policy areas between January and December 2014. It does so through two different perspectives: 1) progress on the policies communicated under the National Reform Programme 2) developments in the identified national priority sectors and policy areas.

4.1 Key policies as outlined in the National Reform Programme

Member States prepare National Reform Programmes (NRPs) each April outlining the country's progress and the key policies and measures to achieve targets under the EU 2020 Strategy. These key policies and measures are summarised in the following table and their current status is provided.

Table 3 Key policies and measures as outlined by the NRP 2014

Supporting investment in energy efficiency within the framework of activity of the National Fund for Environmental Protection and Water Management (Ministry of the Environment)	
Status in the NRP	The NRP lists a number of programmes governed by the National Fund for Environmental Protection and Water Management aimed to support energy efficiency investments, which should start during 2014 and continue to be active also in 2015.
Status as per Dec 2014	Implemented. All programmes governed by the National Fund for Environmental Protection and Water Management aimed to support energy efficiency investments listed in NRP have been put into force.
Description of policy	National Fund for Environmental Protection and Water Management is a state owned fund granting support for environmental initiatives, among others also for energy efficiency investments (see Chapter 4.2.2).

Adoption of the Act on the Energy Performance of Buildings and launch of Registers for Issued Energy Performance Certificates of Buildings (Ministry of Infrastructure and Development – MID)	
Status in the NRP	Expected date for the adoption of the Act on the Energy Performance of Buildings by the Council of Ministers – Q2/Q3 2014. Expected date for the adoption of the Act by Parliament – Q3/Q4 2014. Planned date for the act to enter into force – Q1/Q2 2015.
Status as per Dec 2014	The Act has been adopted in September 2014. The act will come into force on 9 March 2015.
Description of policy	The act implements the provisions of Art. 9, 11-18 of the Directive 2010/31/EU on the Energy Performance of Buildings.

Support for investments in the area of energy efficiency as part of the Act on Supporting Thermo-modernisation and Renovations (MID)	
Status in the NRP	The programme is being implemented on a continuous basis.
Status as per Dec 2014	Implemented. The programme has been functioning in its current form since 2009.
Description of policy	A programme is financed by the state-funded Thermo-Modernisation and Renovation Fund and supports thermo-modernisation and renovations of the oldest, multi-family residential buildings.

Act on the Investments in Renewable Energy Sources (ME)	
Status in the NRP	Expected date for the adoption of the Act on Renewable Energy Sources by Parliament – Q2 2014. Planned date for the Act to enter into force – Q1 2016. Planned date for the Act on amending the Act on Bio-components and Liquid Biofuels to enter into force – Q2 2014.
Status as per Dec 2014	Partly implemented. Act on Renewable Energy has not been adopted yet. However, it is expected that it will come into force in March 2015 and the new support scheme will start to be effective in 2016 (reo, 2014). Act on amending the Act on Bio-components and Liquid Biofuels came into force on 9 May 2014.
Description of policy	Act on renewable energy and the Act on amending the Act on Bio-components and Liquid Biofuels regulate the support for renewable energy sources in different energy sectors.

Draft Act on Transmission Corridors (MID)	
Status in the NRP	Expected date for the adoption of the draft Act by the Council of Ministers – Q4 2014. Expected date for the adoption of the Act by Parliament – Q2 2015.
Status as per Dec 2014	Not implemented. Expected date for the adoption of the draft Act by the Council of Ministers is now Q1 2015.
Description of policy	The Act is expected to facilitate constructing, operating and modernising technical infrastructure for the supply of electricity, gases, heat, oil and petroleum products.

Increasing competitiveness on the domestic natural gas market (ME)	
Status in the NRP	A gradual increase of the so-called “exchange obligation” to the level of 40% of natural gas introduced at that time to the transmission network – since 1 Jan. 2014 – and 55% of natural gas introduced at that time to the transmission network - since 1 January 2015.
Status as per Dec 2014	Implemented. The exchange obligation of natural gas has been introduced already in 2013. The level of this obligation is continually raised.
Description of policy	The exchange obligation has been introduced through an amendment of the Energy Law from September 2013. This obligation forces entities on the natural gas market to sell a specified volume of natural gas on the commodity exchange or a regulated market. This regulation increases competitiveness on the natural gas market in Poland as the prices for gas traded on the market are not regulated by the Energy Regulator.

4.2 National policy priorities

The below sub-sections provide updates on key existing and new policies in priority sectors and policy areas of relevance to the energy and climate targets under the Europe 2020 strategy[2]. Each sector or policy area contains information on the most important policy instruments in operation or development.

4.2.1 Environmental Taxation

In Poland, the implicit tax rate on energy is the tenth lowest in the EU with 96 EUR per ton of oil equivalent in 2012 (compared to the 173 EUR average) (Eurostat, tsdcc360). However, the share of

[2] The Consortium jointly with DG Clima identified these based on identified challenges in Country Profiles (EEA, 2014), share of sectors in total GHG emissions, and Country Specific Recommendations (2014). DG Clima has identified additional relevant issues to be reviewed for some or all Member States, including country specific energy challenges.

environmental tax revenues in overall tax revenue was at 7.8% in 2012, and therefore above the EU average of 6.1% (Eurostat, ten00064). When comparing environmental tax revenues with GDP, Poland lies slightly above the EU average with 2.5% in 2012 (Eurostat, ten00065).

The tax on energy is called “podatek akcysowy” and is ruled through a Tax Act from 2008 (Ustawa z dnia 6 grudnia 2008 r. o podatku akcyzowym). The tax is levied, among others, on energy sources (e.g. coal, fuels, natural gas) and electricity. The amount of the tax on electricity is 20 PLN (approx. 5 EUR) per MWh (RES-LEGAL, 2014). The tax on coal amounts to 1.28 PLN per GJ, and on specific engine fuels 1565 PLN per 1 000 litres (Tax Act, 2014).

In September 2014, a new law on taxing hydrocarbons (Ustawa o specjalnym podatku węglowodorowymi, zmianie ustawy o podatku od wydobycia niektórych kopalin oraz zmianie niektórych innych ustaw – “Law on Special Hydrocarbon Tax, Tax Law Changes the Minerals Extraction and Some Other Laws”) has been adopted. The regulation will enter into force in 2016, but it is unlikely that taxes will be levied before 2020. This delay is intended to encourage shale gas extraction in Poland, as companies would not face taxes on the resulting fuel in the short term (Sejm, 2014b).

4.2.2 Energy Efficiency

Within the EU28, Poland has the seventh most-energy-intensive economy. Energy intensity declined by 21% from 2005 to 2012, which is above the EU average decline of 13% (Eurostat, tsdec360). In contrast, final energy consumption increased by 9% from 2005 to 2012 which is mainly due to increases in the transport and service sector. Thus, Poland is one of the seven EU MS that did not reduce their final energy consumption at all (Eurostat, tsdpc320). Poland is currently on track to meet its indicative EU energy efficiency target on final energy consumption, but concerning the primary energy consumption target more efforts are needed (EEA, 2014a).

Identified barriers for more investments into energy efficiency in Poland include the public procurement practices which do not involve sustainability criteria for public procurements and lack of financial support for private investments in energy efficiency measures (Adelphi, 2013).

According to the strategy "Energy Security and the Environment - prospect for 2020", Poland’s aim regarding energy efficiency amounts to 37% of energy efficiency gain[3] by 2020 comparing to the year 2000.

In order to achieve this goal, the following measures will be implemented:

- Creation of a comprehensive educational program to improve energy efficiency
- Enabling pro-efficiency measures for private individuals, in particular the housing communities and promotion of energy-efficient buildings
- Promotion of ESCO companies
- Support of the development of high-efficiency cogeneration and heating (MG, 2014d)

In 2014, the National Fund for Environmental Protection and Water Management initiated a number of programmes aimed to support energy efficiency investments. Among others a call for applications for funding under the programme "Support for entrepreneurs on low-carbon and resource-efficient economy" started to apply in March 2014. More than 340 million PLN (approx. 81.6 million EUR) in the form of grants and loans are planned to be allocated to projects improving energy efficiency in energy-intensive enterprises (MOS, 2014).

In September 2014 the Act on the Energy Performance of Buildings has been adopted. The act will come into force on 9 March 2015. The act implements the provisions of Art. 9, 11-18 of the Directive 2010/31/EU on the Energy Performance of Buildings (MIR, 2014c).

[3] 63 ODEX, where ODEX ODEX is the index used in the ODYSSEE-MURE project to measure the energy efficiency progress. See: “Definition of ODEX indicators in ODYSSEE data base”.

4.2.3 Renewable Energy

The share of renewables in gross final energy consumption was 11% in 2012 which is above the indicative 2012 target of 8.8% set out by the Renewable Energy Directive (RED). The average annual growth rate in the sector was 8.4% between 2005 and 2012. Thus, an annual growth rate of only 4.8% is needed between 2013 and 2020 to reach the 2020 target of 15% (EEA 2014a). The share of renewable electricity generation in final electricity consumption more than tripled from 2.6% to 10.7% from 2005 to 2012, while the share of renewable heating only increased by a third from 10.4% to 13.7% (Eurostat, SHARES 2014).

According to the strategy "Energy Security and the Environment - prospect for 2020", Poland's aim regarding the share of energy from renewable sources in gross final energy consumption amounts to at least 15%.

In order to achieve this goal, the following measures will be implemented:

- Promoting and supporting investment in renewable energy
- Development of policies and support systems dedicated to high-efficiency biomass firing plants with particular emphasis on small installations
- Promotion of energy crops on the lowest category soils (MG, 2014d)

The legislative work on the Act on Renewable Energy Sources continued in 2014. In April the Council of Ministers adopted the Act on Renewable Energy Sources. In June, the draft has been presented to the Parliament, where it has been forwarded to an Expert Commission for Energy Issues and Energy Sources. At the same time, public consultations have also taken place. The Commission presented its opinion on the draft in December 2014. It is expected that the draft will be approved by the parliament in the first quarter of 2015 and that the act will come into force in March 2015 (MG, 2014a; Sejm 2014a; reo 2014). The draft law introduces a new support scheme for RES-E in a form of auction scheme. The existing quota scheme should continue and apply for already existing plants for 15 years after their commissioning. However, their operators can choose if they prefer to be supported through the auction scheme instead. In the auction system, there will be 2 tendering categories, depending on the plant capacity (<1 MW and >1 MW). The winner of the tender will be the operator who is committed to deliver a certain amount of electricity for the lowest price, which will represent the guaranteed feed-in tariff for 15 years. Support for co-firing will be restricted and hydro-power plants with capacity above 1 MW will be excluded from both support schemes (Keep on Track Country Report Poland, 2014). The new support scheme, based on an auction scheme will not be active until 2016 (reo 2014).

The main barriers hindering the further development of renewable energies in Poland is a lack of long term policy and legal solutions. Poland has not yet transposed the Directive on Renewable Energy Sources into national law. Since over 3 years, the Polish government is working on the implementation of the new Law on Renewable Energy Sources. As stated above it is expected that the Act will come into force in March 2015 (Keep on Track Poland, 2014).

4.2.4 Energy Networks

In February 2014 the European Commission confirmed the award of more than 120 million PLN (approx. 28.9 million EUR) from the Infrastructure and Environment Programme for the construction of two sections of the electricity interconnection between Poland and Lithuania (sections: Ostrołęka-Narew and Miłosna-Siedlce Ujrzanów). The interconnection is an important element in the creation of a common European energy market by closing the so-called "Baltic ring" (MIR, 2014a).

The Draft Act on Transmission Corridors was originally expected to be adopted by the Council of Ministers by the end of 2014. The Act is expected to facilitate constructing, operating and modernising technical infrastructure for the supply of electricity, gases, heat, oil and petroleum products. Meantime, the name of the draft Act has been amended to the Draft Law on Strategic Investments of Public Purpose (Projekt ustawy o strategicznych inwestycjach celu publicznego). The planned date of the adoption of the Law by the Council of Ministers is now in the first quarter of 2015 and by the Parliament in the second quarter of 2015 (KPRM, 2014).

4.2.5 Transport

GHG emissions as well as energy consumption from transport more than doubled between 1990 and 2012 in Poland. Also, the proportion of transport emissions among Poland's total emissions increased to 12% (Eurostat, tsdcc210 and tsdpc320). Average emissions for newly registered cars are high in Poland with a level of 141.4 CO_2/km. The level is the fourth highest in the EU and with 9% has decreased at a much lower rate than the EU average of 22% between 2005 and 2013 (Eurostat, 2013a). Fuel taxation in Poland is below EU average. The road fuel excise duties on petrol are the third lowest among EU MS and the excise duties on diesel are the ninth lowest (EEA, 2014b).

There is no vehicle taxation based on CO_2 exists (ACEA, 2014) in Poland. The registration tax is based on the car value and engine capacity and is near the EU average. No ownership tax applies to private cars. A local tax is only charged on commercial vehicles depending on weight and number of axles. Poland thus has the lowest vehicle ownership tax in the EU. Distance-based road tolls are levied in Poland on some sections of the motorways. Toll rates are average compared to other EU Member States applying tolls (ACEA, 2012; CE Delft, 2012).

In January 2013 the Council of Ministers adopted the "Transport Development Strategy until 2020 (with a perspective to 2030)" (Strategia Rozwoju Transportu do 2020 roku (z perspektywą do 2030 roku). The Strategy defines the main goals and planned measures with regard to transport sector in Poland. Among others, the Strategy focuses on a goal of reducing the negative impact of transport on the environment (MIR, 2013a). In order to reach this goal the following measures will be supported:

- diversity and complementarity of transport connections within the domestic and international system
- organization of least polluting transport solutions
- demand management of transport traffic
- implementation of new transport technologies reducing negative impacts of transport on the environment.

Worth mentioning is that the GHG emissions in transport sector are predicted to increase. The carbon dioxide emissions will increase from 43,771,000 tons in 2009 to 45,455,000 tons in 2020, the methane emissions from 5,520 tons to 5,910 tons and nitrous oxide emissions from 1,780 to 4,050. At the same time the annual final energy consumption by the transport sector will increase by maximum 21% from 2010 until 2020, from 15.5 Mtoe to 18.7 Mtoe (MIR 2013b).

In October 2014, the Polish Government adopted an Implementation Document for its Transport Development Strategy for 2020 with a perspective up to 2030 (Dokument Implementacyjny do Strategii Rozwoju Transportu do 2020 r. z perspektywą do 2030 r.). The document sets goals for the development of road, rail, sea and inland water transport routes for the years 2014-2020, which will be achieved using EU funds (ERDF, Cohesion Fund and Connecting Europe Facility CEF funds). The goal is to complete the most important stage of modernisation of basic transport routes and to create a coherent transport network with high performance until the year 2023. On the basis of these objectives priority projects will be selected (MIR, 2014b).

The Act on amending the Act on Bio-components and Liquid Biofuels came into force on 9 May 2014. The aim of the Act is the implementation of the Directive 2009/28/EC on the Promotion of the Use of Energy from Renewable Sources. Tha amendments should allow reaching the goal of 10% renewable energy in transport by 2020 (Sejm, 2014c).

4.2.6 Waste

According to the strategy "Energy Security and the Environment - prospect for 2020", Poland's aim regarding waste is to reach an increased level of recycling and reprocessing of paper, metal, plastic and glass of 50% by weight by 2020 and to reduce biodegradable municipal waste going to landfills by 35% compared to 1995.

In order to achieve this goal, following measures will be implemented:

- Ensuring a functioning system of selective waste collection
- Reduce the number of ineffective local landfills

- Implementation and support of low-waste technology and effective recovery and disposal technologies (MG, 2014d)

The Act on Waste came into force in January 2013. The act is a transposition of the 2008/98/EC Directive of 19 November 2008 into the national law. There have been no significant changes in this sector in 2014.

5 Policy progress against Country Specific Recommendations (CSRs) issued 2013

The EU Commission provides Country Specific Recommendations (CSRs) for each MS for consideration and endorsement by the European Council. The recommendations are designed to address the major challenges in relation to the targets of the EU 2020 Strategy. In the following table, the CSRs relevant for climate change and energy are listed, and their progress towards their implementation is assessed.

Existing CSRs	Progress
Renew and extend energy generation capacity.	In the year 2014 three major investment projects for new generation capacity started: in Jaworzno III, Opole and Turów (WNP, 2014)
Improve efficiency in the whole energy chain.	In 2014, the National Fund for Environmental Protection and Water Management initiated a number of programmes aimed to support energy efficiency investments (see Chapter 4.2.2).
Speed up and extend the development of the electricity grid, including cross-border interconnections to neighbouring Member States.	The draft act on transmission corridors, which is expected to facilitate constructing, operating and modernising technical infrastructure for the supply of electricity, gases, heat, oil and petroleum products is expected to be adopted by the Council of Ministers in the first quarter of 2015 (see Chapter 4.2.4). The establishment of interconnection between Poland and Lithuania is ongoing (see Chapter 4.2.4).
Develop the gas interconnector with Lithuania.	The preparation works for the development of a gas interconnection pipeline between Poland and Lithuania continue. The pipeline will be built by companies Amber Grid and Polish Gaz-System. The gas pipeline will have a length of 534 km. The transmission capacity will amount to 4.1 billion cubic meters of gas per year. Construction costs of the interconnector amount to 558 million EUR. The pipeline should start operating in 2023. At the end of October 2014 the European Commission granted funding of 295.4 million EUR for the construction of the pipeline and 10.6 million for the preparatory work (Parkiet, 2014).
Improve waste management.	The Act on Waste came into force in January 2013. The act is a transposition of the 2008/98/EC Directive of 19 November 2008 into the national law. There have been no significant changes in this subject in 2014 (see Chapter 4.2.6).

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