The state of youth engagement in the implementation of the EU's Just Transition Mechanism
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List of abbreviations

EIB……………….European Investment Bank
EU………………..European Union
JTF………………Just Transition Fund
JTM…………….. Just Transition Mechanism
NGO…………….. Non-governmental Organisation
TJTP……………. Territorial Just Transition Plan

Reference

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Executive Summary

The Just Transition Mechanism (JTM) is a regional development programme of the European Union (EU) aiming to support decarbonisation in those regions whose economy depends on the production or consumption of fossil fuels. Spearheaded by the €19.5 billion investments of the Just Transition Fund (JTF), the JTM is supposed to create new low-emission economic activities and reskill workers currently employed in fossil fuels-related sectors. Its intervention is expected to diversify the economy of those regions and end their dependency on fossil fuels.

In order to access funding, Member States must prepare dedicated planning documents called Territorial Just Transition Plans (TJTPs) for their regions that depend on fossil fuels. The TJTPs must justify the need for investments in those regions and outline a clear pathway for the phasing out of fossil fuels and the launch of new green economic activities. EU Member States have been preparing their TJTPs throughout 2020 and 2021. Now, in the first half of 2022, the European Commission is expected to review and approve the TJTPs to start financing the transitions they outline.

As it is required to access all regional development funds of the EU, the TJTPs are also supposed to comply with the partnership principle, which requires the national governments to prepare and manage their plans with inputs and support from local authorities, businesses, social actors and civil society representatives. Since the economic restructuring envisaged in the TJTPs will have long-lasting effects on the targeted communities, a strong implementation of the partnership principle is fundamental to make sure the people living in these communities are engaged in the decisions on their future from start to end.

In particular, young people aged 16-29, as the next generations to live in those territories, have a central role to play in the development of TJTPs and the visions these plans outline - a role that is recognised and actively promoted by the EU itself. However, the past reports from Bankwatch on the state of TJTPs have revealed that the partnership principle has been applied in very different ways across and within EU Member States, with several regions in which civil society representatives have not been engaged. This poses the serious risk that even young people in those communities will not have a say in the decisions impacting their own future and career opportunities.
This report provides a first overview of the political youth engagement activities for the development of Territorial Just Transition Plans of twelve EU Member States. For each country, we look at the partnership processes set up by the national and local authorities in preparation of their TJTPs and identify, wherever they are present, the specific activities for the engagement of young people. For four countries, the information from institutional sources was complemented with interviews to local youth activists active on the just transition at the local level, whether they participated in the TJTPs writing directly or from outside.

Main Findings

- Youth representatives were engaged in some form in the development of TJTPs only in seven EU countries out of the twelve under analysis.

- Most youth engagement processes consisted of providing feedback to already consolidated drafts, which greatly limited the possibility to provide input and have a say in the TJTPs from their inception. Most processes fall short of the basic conditions for meaningful youth participation in the just transition defined by the European Commission.¹

- Youth engagement proved particularly successful in those regions where the local civil society had the capacity to mobilise and represent the voice of youth, which creates a gap with other regions where the civil society had less resources and mobilisation capacities.

Recommendations

- **The engagement of youth in the TJTPs must be harmonised across and within all EU Member States.** The transition envisaged by the JTM cannot be truly just unless young people provide input not just to a few, but to all TJTPs.

- **The national governments of EU Member States must provide for clear political youth engagement activities in the upcoming implementation of the TJTPs,** and equip civil servants accordingly. The existing stakeholder engagement mechanisms must be revised to welcome transparently-selected youth representatives, and a clear share of the projects should be dedicated to young entrepreneurs, political youth engagement activities and education programmes in schools and tertiary education.

- **The European Commission should evaluate the partnerships defined in the TJTPs and provide recommendations** on how to improve them, including specific measures to promote youth engagement. Its technical support should provide concrete indications to state authorities and civil servants to design meaningful youth engagement processes in line with its "Toolkit for youth participation in the JTF".

- **The European Parliament should use its monitoring powers to their full extent** to ensure that the partnerships of TJTPs are meaningful, fair, inclusive and properly implemented. It should open up to inputs from the civil society to complement the reports from the Member States and the European Commission.
Since the European Commission started its mandate in December 2019 under the presidency of Ursula von der Leyen, the core of its programme has been the European Green Deal, a political pathway to put the European Union on track to become carbon-neutral by 2050. The Green Deal made clear that the transition it set in motion would be “just and inclusive” by supporting the people and businesses that would face the hardest challenges from the abandoning of fossil fuels, which is the necessary precondition to achieve a carbon-neutral economy.

In this context, the Green Deal put forward the Just Transition Mechanism (JTM) as a dedicated financial programme to provide support to those regions that are particularly negatively affected by the phasing-out of fossil fuels, usually because their economy is overly dependent on the production and/or consumption of coal, oil and gas. The European Commission already identified the NUTS 3 statistical regions across the EU that depend on fossil fuels in the context of the European Semester 2020, and enumerated them in the Annex D of each country report. To these and other regions justified by Member States, the Just Transition Mechanism provides targeted support to the tune of €55 billion divided between three “pillars”: (1) the Just Transition Fund (JTF), (2) a dedicated Just Transition scheme under the InvestEU programme and (3) a new public sector loan facility consisting of EU grants and loans from the European Investment Bank (EIB).

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1. The Just Transition Fund (JTF)

The Just Transition Fund (JTF) is the leading pillar of the Just Transition Mechanism. First proposed in January 2020 by the European Commission, the JTF is a territorial cohesion fund financed by the EU Multiannual Financial Framework 2021-2027. The Regulation establishing the JTF entered into force in July 2021, defining its structure and functioning.\(^5\)

The JTF is entitled to finance investments in new businesses, research & innovation, renewable energy, sustainable mobility, district heating, digitalisation, decontamination and circularity. To complement such investments, the JTF can also finance projects on the reskilling and upskilling of workers from the fossil fuels sector, as well as job-search assistance, education and social inclusion activities.

The Fund is endowed with €17.5 billion in 2018 values (roughly €19.5 billion in 2021), which have been allocated to all 27 EU Member States in precise quotas. The top five recipients are Poland (20%), Germany (13%), Romania (11%), Czech Republic (8.5%) and Bulgaria (6.7%), which combined account for 59.2% of total funding.

2. Dedicated scheme under InvestEU

The second pillar of the JTM is a dedicated Just Transition scheme under InvestEU. InvestEU is an EU programme to support sustainable investment, innovation and job creation which is expected to mobilise around €372 billion under the current Multiannual Financial Framework 2021-2027.\(^6\) The dedicated Just Transition scheme under InvestEU was launched in January 2020 and is expected to mobilise €10-15 billion, mostly in private sector investments. Projects in regions supported by the JTF can benefit from the scheme, provided such investments are key to the transition outlined in the relevant TJTP [see again footnote 4].

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3. Public sector loan facility
The third pillar of the Just Transition Mechanism is a new public sector loan facility leveraged by the European Investment Bank (EIB). It comprises €1.5 billion in grants from the EU budget and €10 billion in loans from the EIB. The facility will exclusively target public entities, providing support to projects in the regions targeted by the JTF that do not produce a sufficient stream of revenues to be financed commercially. It is expected to mobilise roughly €25-30 billion in public investments [see footnote 4].

Access to funding and the partnership principle
According to the JTF regulation, Member States seeking to receive project funding for their eligible regions must deliver Territorial Just Transition Plans (TJTPs) to the European Commission. The TJTPs are documents that must include a justification for identifying the concerned territories as particularly negatively affected by the phasing-out of fossil fuels, and outline detailed investment strategies towards a climate neutral economy, in line with the EU emissions reduction targets for 2030 and 2050.

Each EU Member State designates a national ministry to oversee the writing of one or more TJTPs in their respective country. It is up to each government to decide how many TJTPs they want to present to the Commission and for which regions, as long as they can justify it. However, the regions already identified by the Commission seem to have higher chances of approval. Upon request, the Commission provides technical assistance to the ministries, which is then carried out by external partners such as academic institutions and consulting firms.

For all its regional development funds, the EU has been embracing the partnership principle, which requires that Member States manage the decisions and implementation measures connected to the funds together with local authorities, economic and social partners, civil society representatives and academic institutions. For the TJTPs, all relevant regulations and internal EU documents underline the importance of partnerships and transparency.

In particular, the JTF regulation provides that the preparation and implementation of the TJTPs must be deliberated in cooperation with the relevant partners mentioned above. However, so far the partnership principle has been deployed very differently from region to region. The TJTPs are usually drafted by the competent national ministry with the assistance of national and/or local working groups composed of government officials, representatives of the European Commission, local authorities, business associations, academics, trade unions and NGO representatives. On top of the working groups, state authorities may decide to consult stakeholder groups through a variety of formats, such as workshops, conferences, calls for projects, surveys, bilateral meetings and public consultations. All these partnership instruments often have widely diverging degrees of influence on the development of the TJTPs, sometimes even from region to region within the same country.

State of play
The following figure provides an overview of the steps undergone by the JTM so far and those yet to come.

As of April 2022, the majority of JT regions are still in the programming phase. This means that their TJTPs are still in the process of being drafted and negotiated between national authorities and the European Commission. This process lacks transparency, as the Commission has always avoided to publish the draft TJTPs and its exchanges with Member States despite the repeated requests of several stakeholders. As a result, it is not possible to know the development stage of each TJTP, and it is expected that they will be published only after the Commission will approve their final version.
The European Commission is expected to give its approval to TJTPs throughout 2022. Once a TJTP is approved, the authorities of the Member State can begin the **implementation phase**, which consists of preparing project proposals to be financed by the three pillars of the JTM. In line with the content of the TJTPs, projects can be used for economic diversification and the upskilling and reskilling of workers employed in the fossil fuels sector. Funding can also be given to projects that fall out of the scope of greater economic diversification provided it is **directly linked to specific objectives of the JTF or clearly contributes to the implementation of the TJTP**. This can include investments on fields such as renewable energy, energy efficiency or research and innovation. The use of this clause will require particular attention, as it could be used by Member States in opaque ways that go against the purpose of the just transition, such as compensating coal industries or paying for the environmental damage they caused.

In conjunction with implementation, relevant authorities will also **monitor** the use of the JTM. This involves reporting on the state of the projects that receive funding, the degree to which they fulfil indicators, and how they align with certain criteria set out in the relevant EU regulations and in the TJTPs. Relevant stakeholders are supposed to be involved in this phase as well, and according to Bankwatch sources Member States will likely do so through dedicated monitoring committees.
Section 1. The engagement of the youth in the Just Transition Mechanism

The ambitious objective of the JTM is to reshape the socio-economic future of entire regions in the EU. Given the magnitude of the envisaged change, next generations are a key stakeholder as the citizens who are expected to inherit what the JTM will build in terms of job opportunities, socio-economic conditions, infrastructures and environmental restoration. It is hardly conceivable that the future of a community is decided without the people who will live in it. The engagement of young people in the just transition is thus necessary to ensure the JTM achieves its objectives, serves the future of the communities it is supporting, and guarantees intergenerational justice in the decisions that are made.

The European Commission is the EU institution tasked by the JTF Regulation with coordinating the implementation of the TJTPs and providing technical support to Member States. In this role, the Commission has addressed the engagement of civil society in the drafting of TJTPs, including the engagement of young people as a specific stakeholder group within civil society. This section will present the main documents and positions of the Commission on youth engagement in order to provide a background to our analysis of their implementation country by country covered by Section 2.

EU efforts to include youth in the just transition

The European Commission has made considerable efforts to have young people included in the just transition from the beginning by sponsoring their participation in the development of the TJTPs.

In January 2021, when most Member States already started working on TJTPs, the Commission published a guidelines document called “Youth for a Just Transition. A toolkit for youth participation in the JTF”, whose stated aim is achieving a participation of young people to the TJTPs that is “ambitious, meaningful and numerous” (p.9). We will expand on its content and its role further in this section.

Later on, in September 2021, the Commission reiterated the fundamental role of youth participation in an internal document on the TJTPs and their evaluation. In the document, the Commission highlighted that the partnership principle is a key feature of cohesion policy, and that “the JTF is about inventing a new economic and social future for these areas, and young people must play an active role in this” (p.20). Although such statements are not binding for the evaluation of TJTPs, they serve as a politically relevant acknowledgement from the EU institution that coordinates the implementation of the JTM.

Now, when it comes to suggest concrete measures to apply its call for “meaningful youth participation”, the Commission does not provide a specific definition of what it is exactly intended when using this concept. However, its Toolkit for Youth Participation in the JTF does specify that youth participation is meaningful provided that it respects some basic conditions, divided in three pillars:

1) **Before you start - Adapt and enable**
   - Treating young people as equals
   - Setting up a youth engagement process with clear goals and a precise scope
   - Co-creating the rules of the process with youth representatives
   - Communicating and advertising the process through the right instruments (awareness raising, social media etc.)
   - Building partnerships with local actors connected to youth (schools, associations etc.)

2) **Youth participation - Work with them, not for them**
   - Involving youth representatives across all stages of the process
   - Giving youth representatives a real role in the debate and projects
   - Recognising that youth is not a homogenous group

- Reaching out to marginalised groups and individuals within youth itself
- Mapping, listing and connecting local youth actors to empower them
- Adapting communication to the style of young people

3) Close the circle
- Providing for follow-up processes to allow youth to be informed on how their input was used
- Making participation continuous to make sure youth are engaged throughout the policy-making processes linked to the just transition

The Toolkit illustrates these basic conditions with a number of examples of practical actions and some best practices from past political participation activities involving youth in EU policies. While the presence of a practical definition of youth participation would have provided more context to these principles and examples, the content of the Toolkit does cover most practical challenges of engaging youth in policy. It is particularly positive that it clarifies that youth is not a homogeneous group, and several minorities and individuals within it are often left behind in political engagement processes. However, the use of the word "participation" seems to imply a consultative and less direct role of youth in the political decisions as an external actor in a process run by the authorities. We would rather use the word "engagement", as we do in this report, because it implies an empowered role where youth is supposed to be an insider in all decisions and actions, as the partnership principle requires.

Overall, the principles and actions defined in the Commission’s Toolkit are a good first step to empower young people to provide a concrete input to the TJTPs of their region. However, while the Commission has shared the Toolkit with the Member States, local authorities and other stakeholders through its distribution channels, as of April 2022 it has not yet carried out an assessment of whether and how the Toolkit has been implemented in the making of TJTPs.

This report aims to fill the lack of a EU-wide assessment on the meaningful engagement of youth in the TJTPs by providing an overview of the youth engagement activities reported by the EU Member States and complementing them with the insights from youth climate activists from the regions included in the just transition.
Section 2. Situation of youth engagement for the Territorial Just Transition Plans of twelve EU Member States

This section will outline the engagement activities specifically dedicated to young people in the decision making and writing of the Territorial Just Transition Plans in twelve EU Member States: Bulgaria, Czechia, Estonia, France, Germany, Ireland, Italy, Luxembourg, the Netherlands, Poland, Romania and Spain.

The countries included in the report were chosen based on their weight within the JTF funding allocation and a varied geographical coverage of EU Member States. The regions we focused on are those first identified as beneficiaries of the JTF by the European Commission in the Annex D of the country reports for the European Semester 2020. Any other regions for which Member States are writing TJTPs have not been considered since the approval of their application is not assured and they might have to be excluded from future reports if the Commission rejected it.

Wherever information is available, the situations of the single regions that are applying for funding under the JTM are dealt with in as much detail as possible. The information used for the country and region profiles comes mostly from publicly available official sources, including reports from the European Commission, national and regional authorities and the consultancies that supported the governments with the TJTPs. The previous Bankwatch reports on the state of TJTPs provided much of the context information.\textsuperscript{11}

For the sake of including the voice of youth representatives themselves and conveying their experiences on the engagement processes, GCE complemented the information from the Member States with interviews with local youth climate activists active on the just transition in the targeted regions. Nine interviews could be conducted between January and April 2022, covering five countries (Poland, Germany, Italy, Estonia and the Netherlands) and nine regions (Eastern Wielkopolska, Upper Silesia, Lower Silesia, Lausitzer Revier, Rheinisches Revier, Sulcis, Taranto, Ida Viru and Groningen). Some of the interviewees participated in person in the youth engagement activities of their state authorities, while others are knowledgeable about the just transition process but could only follow it from outside owing to a lack of youth engagement activities. The resulting country profiles will follow now in alphabetical order.

\textsuperscript{11} All reports are accessible at the web page https://bankwatch.org/project/just-transition#project-publications
In the 2020 country report, the European Commission indicated that the just transition in Bulgaria is mostly supposed to focus on the major mining area of Maritsa, in the Stara Zagora Province. Maritsa accounts for 85% of all jobs in the coal sector of the country, with over 10,700 workers in the mines and 1,800 in the energy plants. The Commission also suggested to include the second Bulgarian coal mining area by size near the town of Bobov Dol, in the Province of Kyustendil, where around 1,500 jobs depend on the brown coal industry.

Following this input, the Bulgarian government decided to draft a TJTP for the Stara Zagora Province and one for the Bobov Dol coal area, spanning the Provinces of Kyustendil and Pernik.

The overseeing and drafting of the TJTPs in Bulgaria is entrusted to the national Ministry of Energy. The consultancy firm PriceWaterhouseCoopers (Pwc) provides technical assistance in the process. The partnership with relevant stakeholders is managed mostly by Pwc at the national level and the local authorities in the two targeted coal regions. In early 2021, the consultant first set up an ad-hoc national working group of 15 experts and former directors of coal industries. After that, throughout 2021 it reached out to national and local authorities, businesses, trade unions and environmental NGOs to consult them via bilateral meetings. In most cases, these meetings aimed at illustrating the strategy and progress of the working group, with the possibility for participants to give feedback. No multi-stakeholder meetings were organised to exchange views and gather proposals.

Youth associations did not feature among the stakeholders approached by the consultant to provide feedback on the TJTPs, but in its final report they were indicated as a potential stakeholder for the implementation phase.

When it comes to the local authorities, from 29-30 September 2021 the local Development Agency of Stara Zagora and WWF Bulgaria organised the 4th meeting of the EU-wide Forum of Mayors for the Just Transition in Stara Zagora city. The hybrid event mustered officials from the European Commission and various local authorities from other EU States together with local Bulgarian stakeholders to discuss the state of the just transition through thematic debate sessions. One of the sessions did include four youth representatives from student associations and NGOs to discuss the future of the Bulgarian coal areas. However, apparently the event was not part of a more structured consultation process, and no follow-up processes were revealed, so it is likely that the engagement of youth representatives was limited to that event, without a real possibility to provide input to the TJTPs.

As of April 2022, the Ministry of Energy has not yet published the results of the consultations with stakeholders or the drafts of the TJTPs, so that it is still not possible to know the content of the plans and whether the feedback from stakeholders was included in them.


Czechia

The just transition in Czechia is targeting the two coal mining regions spanning the three provinces (kraj) of Moravskoslezský, Ústecký and Karlovarský which together are home to over 21,000 people working directly in mines and energy plants, plus around 19,000 indirect jobs.\(^{15}\)

The national Ministry of Regional Development oversees the development of the three Czech TJTPs, with technical assistance provided by the Frankfurt School of Management and Finance and the Technical University of Prague.

Bílina coal mine. Ústecký Region. ©Milan Jáhna

The Ministry structured its partnership with relevant stakeholders around a national working group called Transformation Platform, established in October 2020. The working group is supposed to provide stakeholders with a means to influence the drafting of the TJTPs. It is composed of 39 members from national ministries, local authorities and representatives from business and trade unions. Civil society representatives were initially not included in the Platform. However, after some repeated petitioning, a single representative from the NGO Centre for Transport and Energy was allowed to join in 2021 with a mandate to represent the entire civil society. According to a written reply we received from the Czech government, **youth is represented in the national Czech working group through representatives of the Czech Council for Children and Youth.**

Despite the inclusion of youth representatives in the meetings, the format of the consultation in the working group is problematic. The meetings are structured for one-way communication from the Ministry about the current state of the TJTPs draft. A first draft was presented to participants already during the first meeting in October 2020. Following each meeting, participants are given a one week deadline to submit feedback on the information they receive. The short deadline and the lack of direct communication during meetings significantly inhibits the possibility of providing meaningful comments. However, the working group did provide feedback for the TJTPs, and some of it was taken up from one version of the draft to another.

Besides the working group, the contact person from the Czech government mentioned to us that local youth engagement activities were organised in the three coal regions. However, neither the website of the Ministry nor the three dedicated websites of the regional governments report any consultation activity with local stakeholders. As a result, **there are no confirmed engagement activities for the TJTPs dedicated to youth at the local level.**

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17. See dedicated websites of Moravskoslezský, Ústecký and Karlovarský
As of April 2022, the latest drafts of the TJTPs are publicly available on the website of the Ministry. In the TJTPs drafts, no mention is made of youth engagement activities for the implementation and monitoring phases. Although the reply we received from the Czech government claimed that a public consultation is expected by the mid of the programming period, mentioning youth engagement activities in the TJTP would make for a stronger guarantee that young people will be included in the future.

Overall, although young people have been included in the partnership with relevant stakeholders in Czechia, there are still several critical points both on the functioning of the partnership itself and on how meaningful the role of youth representatives is.

Estonia

Just Transition Region - Ida-Viru County
The Ida-Viru County is the only region targeted by the Just Transition Mechanism in Estonia. Located on the border with Russia, it is the main centre of shale oil production in the Baltic state, generating some 75% of Estonia’s energy production and 69% of its greenhouse gas emissions. 20,000 jobs are estimated to be connected to the shale oil sector in the region.

Shale oil plant. Ida Viru County. ©Jaak Nilson Photostock

The Ida Viru TJTP is managed by the national Ministry of Economic Affairs and Communication, which has been developing it throughout 2021 and the beginning of 2022. Across the process, the Ministry has regularly consulted policy makers, businesses and NGOs through a national steering committee in Tallinn, a local one in Ida Viru, and a final round of consultations in October-November 2021.20

Concerning the engagement of youth, ahead of the final round of consultations the Ministry was approached by the NGO Rohetiiger to organise a citizens assembly of randomly selected local young people and provide feedback to the draft TJTP. According to our interviewee from the organisation, Rohetiiger is a national NGO that regularly organises citizen assemblies on a variety of policy issues. In the context of a call for funds focused on youth, they decided to use their format to allow young people from Ida Viru to provide feedback to the TJTP.

Out of a random sample of 3000 local youths aged 16-29, Rohetiiger selected 33 people and organised some meetings with them where experts introduced them to the TJTP and stimulated the discussion to come back with feedback. Since over 70% of the County’s population are native Russian speakers, the assembly has linguistic facilities for both Estonian and Russian speakers.

The main outcome of the citizen assembly were 26 feedback proposals on the draft of the TJTP, mostly concerning environmental restoration and public amenities (parks, green areas etc.). Some participants founded a follow-up NGO to monitor the future uptaking of the proposals in the TJTP and their implementation.

As of April 2022, the national Ministry has not yet published the draft TJTP, so that it is not yet possible to assess how the ministry has used the feedback received from the youth assembly. In conclusion, although young people could only provide input to a consolidated draft, the engagement activity in Ida Viru seems to have been a good first step that might lead to more meaningful engagement if a good follow-up is implemented.

The Just Transition in France was initially proposed by the European Commission to focus on the departments (local circumscriptions) of Bouches-du-Rhône, in the Provence-Alpes-Côte d’Azur (PAC) Region, and Nord, in the Hauts-de-France Region. The two areas have a high concentration of energy-intensive industries, particularly chemical and steel plants, making them the most emissions-intensive parts of the country while providing for over 153.000 local jobs.\(^{21}\)

According to the National Recovery and Resilience Plan,\(^{22}\) the French TJTPs are coordinated by the National Agency for Territorial Cohesion (ANCT) of the French Government with support from the consultancy firm Technopolis and the authorities from the administrative regions where the targeted departments are located. On top of the two departments identified by the Commission, the French government decided to write four extra TJTPs for eight departments located in the regions of No\(^{23}\)mandy, Pays de la Loire, Grand Est and Auvergne-Rhône-Alpes. As a result, six TJTPs are being developed in France. Their implementation will be managed by the Regions when it comes to investments (70% of all funding from the JTF), and by the Ministry of Work when it comes to reskilling and upskilling projects (30%). The partnerships with relevant stakeholders are managed at the local level by the Regions.


\(^{22}\) Seine Maritime, Loire Atlantique, Moselle, Meurthe et Moselle, Pas de Calais, Isère, Haut Rhin and Rhône.

Just Transition Region - Bouches-du-Rhône

The Bouches-du-Rhône department, located in the Provence-Alpes-Côte d’Azur (PAC) region of Southern France, hosts several petrochemical and steel industries, with tens of thousands of job places depending on them.24

The TJTP for the department is managed by the PAC Region. The Region first presented the JTM to the public in November 2020 to gather feedback and project proposals, and then elaborated the TJTP throughout 2021. Two working groups with representatives of the local and national authorities were set up, and non-institutional stakeholders were consulted via bilateral meetings.25 No list of the consulted stakeholders has been revealed. A final public consultation was carried out between 7 December 2021 and 4 January 2022 by making the draft TJTP and the accompanying assessments available on the website of the region. According to the final report on the consultation, no contribution was received from the public.26

The Bouche-du-Rhone Department has also got its own Youth Council, which apparently was not involved in the making of the TJTP. Overall, youth were not properly engaged in the local consultation, as much as civil society in general.

Just Transition Region - Nord & Pas de Calais

The Nord and Pas-de-Calais Departments, located in the Hauts-de-France Region of Northern France, are home to several electro-intensive industries in the sectors of metallurgy, chemical and petrochemical production. The Region estimates that around 63 000 people are directly employed by such industries.27

The TJTP for the two departments was managed by the Hauts-de-France Region.28 Initially, the Commission only included the Nord Department in the just transition, but the TJTP geographical coverage was extended to the neighbouring Pas de Calais Department. According to the official draft [see note 27], the Plan was elaborated by the regional authorities throughout 2021 in cooperation with representatives from the industry and trade unions, but no actors from the civil society are mentioned. A public consultation on the resulting Plan was carried out from 1 April 2022 to 1 May 2022 on the website of the Hauts-de-France Region dedicated to European funding.29 The draft TJTP and the accompanying environmental assessments were published on the website and opened for feedback from the public. As of the publishing date of this report, the results of the consultation are not yet available.

The general lack of engagement of the civil society in the drafting of the TJTP was reflected in the role of youth, which was also absent.

With most of its energy needs still satisfied by coal, and with the remnants of a considerable coal extraction industry, Germany is the second major recipient of funding from the Just Transition Mechanism, with €2.5 billion from the JTF alone, accounting for 13% of the total capital of the fund. In 2020, Germany decided to phase out coal production and consumption by 2038. To achieve its goal, the federal government plans to support the transition in the coal regions through the investment regulation which is part of its dedicated Structural Strengthening Law. The first pillar of this support for economic diversification projects provides €14 billion for coal areas until 2038. The second pillar supports measures and projects on the federal level with another €26 billion for the affected regions until 2038. The funding from the JTM comes as an additional support to coal regions, but Germany is probably the only country covered by this report where national investments on a just transition overshadow those coming from the EU.

The intervention of the JTM focuses on the three territories (German: “Revier”) where most workers employed in the coal industry are still concentrated, spanning the Eastern federal states of Brandenburg, Saxony and Saxony-Anhalt as well as the Western federal state of North-Rhine Westphalia.

These three just transition regions do not coincide with a specific administrative division, and the two Eastern ones even span the territory of two federal states at the same time (see region profiles below).

The TJTPs of the three territories are coordinated by the Federal Ministry for Economy & Climate Protection, and written by the federal states where the target coal regions are located. In the context of the national strategy for cohesion policy 2021-27, the JTF is planned to be implemented through five multi-fund Operational Programmes associated with two other EU funds: the European Regional Development Fund and the European Social Fund.

When it comes to partnering with relevant stakeholders for the drafting of TJTPs, the information disclosed by the state and federal authorities is quite limited and fragmented. From what is published on official websites, the consultations for the TJTPs, when they took place, have been based mostly on written feedback to already consolidated drafts (see region profiles below). The relatively limited size of the funding from the JTF compared to federal sources and its association with two other EU funds might have greatly influenced the quality of the partnerships for the German TJTPs. Unlike what is disclosed for the TJTPs, consultations with several stakeholders and multiple formats were regularly carried out for the two funds the JTF is associated with, the Regional Development Fund and the Social Fund Plus. It is not clear though if the consultations were carried out separately or together for the three funds.

Just Transition Region - Lausitzer Revier

Spanning the federal states of Brandenburg and Saxony, in Eastern Germany, the Lausitz mining area is a major producer of brown coal. According to the Commission, the phasing out of fossil fuel in the area could endanger the 8,300 direct employees of the coal industry plus an extra 4,900 indirect workers.

The TJTP is managed by the Lausitz Coordination Unit of the two federal states. According to the dedicated webpage of the Brandenburg EU funding website, the TJTP was developed throughout 2021, and opened to written feedback on the website around November 2021. As of April 2022, no draft of the TJTP or report of the consultation is available on the webpage, and it is not possible to assess whether they were on the page in November as stated.34

Given the lack of a report, it is not possible to say whether youth organisations or activists could provide feedback to the Lausitz TJTP. However, providing feedback to an already consolidated draft falls short of the meaningful conditions for youth engagement defined by the European Commission.

Despite this lack of insight into the creation of the TJTP, other local plans and programmes for economic diversification do exist in Lausitz, and they seem to have involved different actors from the federal state and its administration, to representatives of local authorities, businesses, trade unions and the civil society, including the German Foundation for Children and Youth in Berlin.35

In Autumn 2019, interested citizens were able to participate in online consultations for a new Development Strategy 2050 (Entwicklungsstrategie 2050). Following the initiative from the University of Lüneburg, in November 2021 young people could take part in a workshop on how to shape the phasing out of coal in the affected region. The ideas are currently being bundled into a report which was meant to be handed over to the regional and federal governments by Spring 2022.36

**Just Transition Region - Mitteldeutsches Revier**

Located between the Länder Saxony and Saxony-Anhalt, the region hosts the smallest share of direct and indirect jobs in brown coal mining among the three German regions supported by the JTM, representing only 0.3% of the local workforce. However, the Commission deems that the region needs investments due to its low level of innovation and rapidly ageing population.

No Information on the development of a TJTP for the Mitteldeutsche Revier could be found in the websites of the two federal states. When it comes to federal funding though, the Mitteldeutsche Revier is expected to receive €8 billion until 2038. The implementing Structural Development Programme is a result of recommendations by the board of federal and state governments as well as different state strategies such as the regional innovation strategy.\(^{37}\)

Next to other working groups, the governmental Structural Change Unit convened the consortium "Social Participation", composed of representatives of organised civil society from various stakeholder groups (e.g. youth, senior citizens, migrants, people with disabilities and impairments) to discuss citizen participation in the just transition. In June 2021, the Structural Development Programme then received inputs from these stakeholder engagement activities conducted by the governmental Structural Change Unit. It is not clear from the final text of the Programme what the specific contribution of youth representatives was. However, the document contains criteria for future participation and acknowledges that young people should play a special role in the participation process.\(^{38}\)

Such plenty of information on national programmes as compared to EU funds might show the unique approach Germany is taking in its just transition and the fact that national funding greatly overshadows the JTM.

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Just Transition Region - Rheinisches Revier

Located in the federal state of North-Rhine Westphalia (NRW), the area spans the circumscriptions of Düren, Rhein-Erft-Kreis, and Rhein-Kreis Neuss, and it hosts brown coal mines employing around 8,960 direct workers and supporting 5,380 indirect jobs. Among the three German regions, it is considered the fittest to adapt with its own resources by the Commission.

The local TJTP was developed by the authorities of the federal state NRW. On top of the circumscriptions identified by the Commission, the TJTP also covers the cities of Aachen and Bottrop and the district of Recklinghausen. As in the case of the Lausitzer Revier, the dedicated webpage of the federal state claims that the documents related to the JTF were published there from February to March 2022 and opened to feedback from users. As of April 2022, no document is published on the webpage, nor is it possible to assess if it ever was.

The lack of engagement of stakeholders for the TJTP of the Rheinisches Revier was confirmed by an interviewee belonging to one of the major youth networks of the federal state. Despite the youth organisation’s connection and regular interaction with the local Ministry of Youth and the Ministry of Environment, the Just Transition Fund was never mentioned in discussions. None of the youth associations that are part of the umbrella organisation interviewed has been involved in discussions on the TJTP, even in the context of the existing platforms to discuss the phasing out of coal in the region.

The partnership for the TJTP appears in an even worse light if compared to the one for the Regional Development Fund, for which the federal state carried out extensive consultations with local stakeholders throughout 2019 and 2020. A wide range of formats were used, such as meetings, a survey and a dedicated conference. It is not clear if the JTF was treated in such a consultation, but since it was finalised in 2020 this is quite unlikely to be the case.

Just Transition Region - Midlands
The only area to be included in the just transition in the Republic of Ireland is the Midlands region, in the centre of the island. Its economy strongly relies on the production and use of peat to produce electricity, with around 4,000 jobs connected to the sector.\footnote{42. EU (2020). COMMISSION STAFF WORKING DOCUMENT Country Report Ireland 2020. SWD/2020/506 final}

Credits: Peat mine field in the Irish Midlands. ©geograph
Ireland launched its National Just Transition Fund for the Midlands worth €11 million already in 2019. The JTF will bring €84 million more to the region alongside the national programme. The TJTP for the Midlands was drafted throughout 2021 and early 2022 by the Department of Environment of the Irish Government with support from the consultancies AARC Ltd and EnvEcon.

Ireland started an extensive partnership with relevant stakeholders already when running its National Just Transition Fund in 2020. The government used engagement formats such as workshops, research reports and a major conference in October 2020. There was a wide variety of engaged stakeholders, including the National Youth Council, which presented its own Youth Manifesto for Climate Justice during the conference.

The consultants drew from such past experience and some extra consultations carried out in early 2021 to present a proposal for the stakeholder engagement for the TJTPs. The National Youth Council was indicated as the main youth-related stakeholder to be contacted for the partnership.

An extensive public consultation on the final draft of the TJTP was carried out from December 2021 to February 2022 through online surveys and three virtual workshops. One of the workshops was specifically dedicated to young people aged 16-24, but as of April 2022 it is not clear from the sources of the national government if the workshop is still to take place or has already been finalised. As a result, it is not possible yet to assess how meaningful the engagement process was and if it had any impact on the draft of the TJTP.

The just transition in Italy is focused on the energy intensive industries of the Southern city of Taranto and the last coal mining area in the country in the south of the island of Sardinia.\(^\text{48}\)

The preparation of the TJTPs for the two regions is managed by the Department for Territorial Cohesion of the Presidency of the Italian Government, with support from the consultancy PriceWaterhouseCoopers (Pwc) and project inputs from the regional and municipal authorities of the two areas.\(^\text{49}\)

Pwc carried out the preliminary work to inform the writing of the TJTPs between March and May 2021, and since then the Italian government was supposed to work on the final drafts. As of April 2022, the Italian government has not published any further details on the state of the two TJTPs.

When it comes to consultations with local stakeholders, they were mostly managed by Pwc, which was tasked to consult with local policy makers, business representatives and trade unions from the two regions. Civil society representatives were not targeted as potential interlocutors. The only other engagement activity was a call for projects in Taranto, but generally the engagement of the civil society, including youth, has been extremely lacking for both TJTPs.

\(^{48}\) EU (2020). COMMISSION STAFF WORKING DOCUMENT Country Report Italy 2020. SWD/2020/511 final  
Just Transition Region - Taranto, Puglia

The city of Taranto, in the Southern Italian region of Puglia, houses the biggest steel mill in Europe, generating extreme levels of pollution while accounting for around 20,000 direct and indirect jobs in a city of 200,000.

During the preliminary work, Pwc consulted stakeholders through bilateral meetings with selected local policy makers, businesses, trade unions and academics. The consultation took place in May 2021, and it aimed to identify the main areas of action for the just transition and gather ideas for projects. The outcome was presented in September 2021.\(^{50}\)

In June 2021, Puglia regional authorities launched on its website its own public call for projects, open to all users. By the closing of the call in December 2021, two projects were presented by local NGOs.\(^{51}\) Our local interviewee confirms that neither the regional nor the municipal authorities did properly reach out to the local NGOs to advertise and support in this call for projects. Since the civil society in general was not engaged in the writing of the TJTPs, the same inevitably goes for youth.


Just Transition Region - Sulcis Iglesiente, Sardegna

The area of Sulcis Iglesiente, in the South-West of the island of Sardinia, hosts Italy’s last coal mine, with around 350 workers, and performs extremely poorly in terms of quality of life, employment levels and ageing population.

Also in this case, Pwc carried out a consultation with local stakeholders between March and April 2021. The actors that were involved represented local authorities, businesses and trade unions. No representative from the civil society, including youth, is mentioned to have been approached. The consultancy reported on the outcome of the consultation in July 2021.52

According to our two local interviewees, there was initially some considerable interest with the potential of the just transition among the municipal authorities and civil society of the Sulcis area. The Sardinian regional authorities, however, did not prioritise the collection of projects for the TJTPs. Only after some pressure from local mayors did the Region launch a call for projects in May 2021, with extremely close deadlines for local municipalities to present their projects by July. As a result, most municipalities assembled their projects very quickly in the space of two months and **no public consultation was possible. As a result, youth was not engaged at all** in the making of the TJTP for Sulcis.
Just Transition Region - Rumelange and Esch-sur-Alzette

In Luxembourg, the just transition is going to focus on the electro-intensive industries based in Rumelange and Esch-sur-Alzette, whose plants account for 69% of the country’s industrial emissions.\(^{53}\)

Luxembourg set up the governance of its TJTP around various ministries of the central government. According to the final draft, the plan was developed internally by various departments of the government throughout 2021. No stakeholders external to the government are mentioned to have been involved, and no implementation of the partnership principle is mentioned either.\(^{54}\)

When it comes to public consultations, the TJTP final draft and accompanying environmental assessment were published on 21 January 2022 on the national EU funding website and opened to written feedback from the general public for a period of 45 days.\(^{55}\)

As of April 2022, the results of the public consultation have not been revealed yet. However, it is clear that such a top-down process without a real partnership with non-governmental stakeholders would be highly insufficient to ensure meaningful engagement even in the case youth organisations had participated.

The just transition in the Netherlands is going to focus on six energy-intensive industrial clusters across the country: Groningen, IJmond, Groot-Rijnmond, West Noord-Brabant, Zeeuws-Vlaanderen and Zuid-Limburg.\(^6\) Groningen in particular, with its dependence on natural gas production and over 20,000 jobs at risk from its phasing out, is going to receive €330 million out of the total share of €623 million allocated to the Netherlands by the JTF. However, TJTPs are being developed for all the six areas.\(^7\)

The TJTPs of the Netherlands are coordinated by the national Ministry of Economic Affairs and Climate, and developed by the governments of the Provinces where the six industrial clusters are located: Groningen, North Holland, South Holland, North Brabant, Zealand and Limburg. The Ministry plans to create an overarching national Just Transition Plan that will finance the projects under the six TJTPs.\(^8\) The national and territorial Just Transition Plans were developed throughout 2021, and submitted to the European Commission on 22 March 2022.\(^9\)
**Just Transition Region - Groningen**

The Province of Groningen, in the North of the Netherlands, is the main focus area of the just transition in the country owing to the heavy reliance of the local economy on the production of natural gas and the presence of energy-intensive industries.

The local TJTP was developed by the Province of Groningen throughout 2021. The Province has a permanent Youth Advisory Council that can be consulted on policy matters. Our local interviewee is one of the representatives sitting in the Council. According to his account, the drafts of the TJTP were not submitted to the advisory body. However, **the youth representatives from the Council were invited to a general public consultation event** with several local stakeholders that took place around August 2021. During the event, the Province officials and several experts exposed to the public the draft TJTP. The stakeholders that attended were asked to provide written feedback after the event.

Given the highly technical content of the proposal, **the youth representatives that attended, including our interviewee, did not feel capable of providing any meaningful feedback.** The Youth Council was not invited to any follow-up activity or event, and to our interviewee’s best knowledge no such activities were held at all. To conclude, **the youth engagement process in Groningen was very superficial, and did not fully use the potential of the existing youth representation bodies** present in the region.
Poland

As home to more than half of the whole coal mining workforce in the EU, and with a national energy system strongly reliant on coal, Poland is the main recipient of investments from the Just Transition Mechanism. From the JTF alone, the country has been allocated €3.5 billion in 2021 prices, i.e. 20% of the entire capital of the fund.

Belchatow mine and energy complex, Central Poland ©Independent.co.uk
The European Commission initially planned to include three Polish coal mining areas in the just transition (Eastern Wielkopolska, Upper Silesia and the Wałbrzych District in Lower Silesia), but the Polish government has prepared TJTPs for four more in the hope they will also be approved (Lubelskie, Łódzkie, Western Małopolska and the Zgorzelec District of Lower Silesia).60

There are two types of Just Transition Plans in the country: a National Plan developed by the Ministry of Climate and Environment, and local TJTPs coordinated by the Ministry of Development Funds and Regional Policy. The latter were developed in each of the above-mentioned regions by the Marshal of the local voivodeship through the Local Development Agencies.

In the process, all Marshals regularly consulted the local civil society by setting up ad hoc working groups gathering national and local policy makers with businesses, trade unions and, with one exception, NGOs. However, there were some remarkable differences in the way consultations were carried out in each region, both in terms of instruments (meetings, workshops, written submissions) and the type of actors involved.

**Just Transition Region - Eastern Wielkopolska**

Eastern Wielkopolska covers the Eastern part of the Voivodeship of Greater Poland around the city of Konin. The region hosts 6,000 people employed in brown coal extraction and electricity production. On top of job losses, the local open-pit mines pose several environmental challenges.

Public consultations for Eastern Wielkopolska’s TJTP have been extensive and regular. Even before the Just Transition Mechanism saw the light in late 2019, the transition from coal mining had been a key debate topic in the region, with informative meetings and public debates organised by the authorities.

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Thus, when it came to consult the civil society on the TJTP, several rounds of consultations were held by the authorities throughout 2020 and the first half of 2021. The format was meetings and workshops with a variety of economic, social and non-governmental stakeholders, whose input was included in the final TJTP.

Concerning youth engagement, there was initially no specific attempt from the Marshal Office or the Local Development Agency to reach out to young people specifically. However, when a representative from the local branch of Fridays for Future attended the public consultation meetings regularly, the Development Agency approached his organisation to let them participate in some meetings of the stakeholder working group and, in parallel, set up a committee of young people to come back with proposals for the TJTP. The committee was held, and many of its proposals, particularly on education, were eventually included in the final TJTP, which was presented to the European Commission in July 2021. According to our interviewee, even inside the working group the attitude of other stakeholders, such as miners, gradually opened up to the proposals of youth representatives.

In the end, the engagement of youth in the drafting of the TJTP in Eastern Wielkopolska proved to be quite meaningful, constant and open to inputs. However, a downside of the Plan submitted to the Commission is that it does not specify any governance mechanism to keep engaging youth in the implementation phase.

A meeting of the youth committee in October 2020. Konin, Eastern Wielkopolska. ©Fridays for Future
**Just Transition Region - Upper Silesia**

Silesia is by far the biggest coal extraction area in the whole EU bloc. Half of all coal miners in the EU are based in the region, with over 78,000 jobs across 18 mines. Given the massive number of workers involved, the transition is expected by the Commission to require massive investments in both big and small businesses.

![Murcki mine, Silesia, Poland ©flickr](image.jpg)

The local Marshall Office and Development Agency structured the consultations with stakeholders around multiple rounds. A first round of project collection took place in 2020, and the resulting draft was published online to gather written feedback from the public. For the third round, in summer 2021, the Marshal Office organised meetings with specific categories of actors (businesses, trade unions, NGO etc.). **None of these meetings included youth representatives.**

In this context, the local NGO **Bomiasto**, which is active on urban regeneration projects in the Silesian capital, Katowice, started its own youth engagement activities. According to our interviewee from the organisation, Bomiasto was receiving funding for an awareness raising project on urban regeneration and environmental issues with a range of stakeholder groups.
Their format is organizing trainings and workshops where experts spread knowledge on such topics to gather inputs from citizens. In the context of such activities, **Bomiasto gathered around 30 Silesian youth associations to hold a workshop where they could get to know more about the EU just transition and provide their input.** In the end the workshop came up with a document of proposals on climate mitigation measures needed for Silesia, and Bomiasto made it public through its media contacts. Some officials from the local authorities reacted to the document, but no meeting with Bomiasto and the youth NGOs was organised.

Since the TJTP was not published before being submitted to the Commission in July 2021, **there is no way to assess whether the proposals from Bomiasto's workshop were considered by the authorities.**

**Just Transition Region - Wałbrzych District, Lower Silesia**

Like the rest of Silesia, the economy of Lower Silesia used to be based on coal extraction, but an unfinished transition away from it has left the region with above-average levels of unemployment, poverty and pollution.

According to a written response we received from the city office of Wałbrzych, **the local authorities tried to reach out to youth** in the process of preparing their Social Territorial Just Transition Plan (which was the basis for TJTP written in Lower Silesian Marshal Office), **but they did not manage to involve any youth representative.**
In Romania, the Just Transition Mechanism is going to support six counties across the country: Hunedoara, Gorj, Dolj, Galați, Prahova and Mureș. Hunedoara and Gorj host the main coal areas of Romania, employing over 28,600 people in mining and electricity production while accounting for over 30% of the total Romanian emissions. The other four counties host the main energy-intensive industries in the country (chemicals, metals, fertilisers etc.), accounting for 35% of its total emissions.61

The six Romanian TJTPs, one per county, are coordinated by the national Ministry of Investments and European Projects, with technical assistance from the Frankfurt School of Management and Finance. The Ministry decided to prepare an overarching national Operational Programme for the Just Transition (OPJT) that will finance the projects of the TJTPs, which are written in coordination with the local Regional Development Agencies and County Councils of the six targeted counties.

The partnership with the relevant stakeholders is managed through a national working group and six local working groups set up in each of the target counties since October 2020. Each working group gathers representatives of the national government, local authorities, businesses, trade unions and academia. Some of them also include environmental and social NGOs. **No working group currently includes youth organisations or youth representatives.**

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In the first half of 2021 the consultant of the government also carried out some bilateral consultations with stakeholders, mostly businesses and trade unions. **Youth organisations were not approached for such meetings**, and no joint meetings gathering more stakeholders at the same time were organised.

In April 2021, the consultant published a report on the state of the partnerships with stakeholders for the just transition process. Their main findings were that there were several flaws in their functioning of the local working groups, from the way they were organised to the number and type of partners included, and the lack of expertise on development planning. The consultant found remarkable differences from county to county in the advancement of the work and in the number and type of members of each working group. The consultant’s advice was to contain the number of participants in order to facilitate the work while opening up to new stakeholders, particularly NGOs, and making the whole output of the working groups transparent and accessible to the general public. Moreover, the consultant created a matrix of

![Coal facilities in the Jiu Valley, Hunedoara. ©Viktor Macha](image-url)
over 290 stakeholders to facilitate the future engagement activities of the government. Youth associations were included in the matrix, with a recommendation to engage them in the future partnerships.  

After the publishing of this report, the Ministry of Investments proceeded with finalising the TJTPs and submitted them to the European Commission on 26 July 2021.  

No further public consultation or reform of the working groups was done in the meantime, so that the voice of youth has remained unrepresented in the six Romanian TJTPs.


Spain

Spain has fourteen operative coal-fire energy plants supporting 3,300 direct and 10,000 indirect jobs. The country is the only one in the EU with a national Just Transition Strategy, and it closed down its last coal mines already in 2018. The JTF in Spain is going to complement the national strategy in the eight areas where the coal plants and the former coal mines are located across the country: Asturias, León and Palencia (Castilla y León), A Coruña (Galicia), Cádiz, Córdoba and Almería (Andalusia), and Teruel (Aragon).

A single national TJTP was elaborated by the Institute for the Just Transition of the national Ministry of Ecological Transition.

The partnership to gather the input of relevant stakeholders for the TJTP is structured around nineteen local working groups called Just Transition Covenants. Managed by the local municipalities of the areas targeted by the just transition, each local working group organises workshops, calls for proposals and surveys with local authorities, businesses, trade unions and NGOs. **No working group managed to include youth associations or representatives.** On top of the regions identified by the Commission, the Ministry decided to launch Covenants also for the areas of Zorita, in Castilla-La-Mancha, and Alcudia in the Balearic Islands.

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Young people aged 16-30 were the target group of a specific national consultation between September and October 2021. The consultation consisted of an online survey and a series of seven online workshops targeting most of the areas covered by the working groups. As of April 2022, the results of the consultation or the drafts of the TJTPs have not been published yet, so that it is not possible yet to assess how meaningful the youth engagement activities were and what impact they had.\(^{67}\)

## Summary table

<table>
<thead>
<tr>
<th>Country</th>
<th>Regions covered by a TJTP</th>
<th>Youth included in partnership?</th>
<th>Format</th>
<th>Input adopted in TJTP?</th>
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<td></td>
<td>Nord + Pas de Calais</td>
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Section 3. Conclusions and recommendations

Although there are differences from country to country and from region to region, a common feature that clearly emerges from this overview is that **young generations have not been considered by state authorities as a key stakeholder to approach for the writing of TJTPs.** Only in two countries, i.e. Ireland and Spain, did the authorities provide for youth engagement instruments from the beginning in their partnership for the development of the TJTPs.

Most other countries either did not engage youth altogether, like France, Romania and Italy, or did so in a very superficial way through feedback to already consolidated drafts, as was the case for the Netherlands. Moreover, even in those few cases where youth was meaningfully engaged and could put forward concrete inputs for the TJTPs, like Eastern Wielkopolska, Silesia and Ida Viru, this happened mostly after a internal mobilisation within civil society, with the authorities in the position to endorse or ignore such efforts. Finally, with the notable exception of Eastern Wielkopolska, the impact of the inputs of youth engagement activities was hard to assess in all countries owing to a general lack of transparency in the publication of the various drafts of the TJTPs.

Overall, considering both the activities that were organised and the impressions of our interviewees, the authorities of the EU Member States under analysis do not appear particularly interested in, and equipped to, engaging young people in the TJTPs. Excluding the cases of Ireland and Spain (whose state-run activities remain to be assessed, though) **youth engagement was possible only in those regions where NGOs and youth activists had the mobilisation capacity and the will to make young people’s voice heard over the lack of specific engagement activities of the state authorities.** This gave rise to new inequalities among young people in the different regions, as the level of organisation of the local NGOs decided whether their voices were considered in the development of the TJTPs or not.

Such a state of things goes against most of the basic conditions defined in the “Toolkit for the participation of youth in the JTF” of the European Commission. The Toolkit called for youth representatives to be treated as equals to all stakeholders, be engaged throughout the process, represent also marginalised youth sub-groups and be informed on the way their input is used for the TJTPs.
Across the twelve EU States, young people were not treated as equals to other stakeholders like businesses and trade unions, which were almost always and constantly engaged. Youth representatives were also mostly not included in the design of the partnership process itself, and there were no real efforts to reach out to marginalised young people. Even the few youth representatives that managed to provide input to the TJTPs were mostly already engaged in politics and activism. Finally, even when young people did provide inputs to the TJTPs, only in Eastern Wielkopolska was the input managed transparently enough to assess that it was implemented in the TJTP. In all other regions, the final drafts of the TJTPs were handled quite opaquely, with no real opportunity to access them and assess whether the input from youth was considered or not. **Overall, the Commission's Toolkit remained largely unheard and unapplied by the Member States.**

As TJTPs are being submitted to and evaluated by the European Commission, the JTM is now entering a crucial phase. What emerged from our analysis is that **there were huge differences in the way youth engagement was implemented across the twelve EU Member States.** In the context of a programme with the core goal to reduce the inequalities emerging from decarbonisation, such differentiated engagement has the potential to induce new inequalities between those young people that had a say in the future of their community and those that were either not asked or not listened to.

**There is still time for the EU and its Member States to address this gap in order to prevent it from becoming a structural issue** that affects the implementation and monitoring of the entire Just Transition Mechanism. The EU institutions have the capacity to highlight the significant lack of youth engagement in the TJTPs and demand changes, and Member States have the capacity to redress the lack of meaningful youth engagement on the ground.
In particular, we want to put forward the following recommendations to the main political actors:

- **To EU Member States:**
  - To integrate specific plans for youth engagement activities in the sections of the TJTPs defining the governance of stakeholder engagement for the implementation and monitoring phases.
  - To create formation courses for the civil servants of the authorities tasked with the implementation of TJTPs to get acquainted with, and learn how to implement, the Commission’s “Toolkit for the participation of youth in the JTF”.
  - To include youth representatives, appointed with a transparent and inclusive process, in the existing governance mechanisms set in place to manage the partnership with relevant stakeholders (working groups, conferences etc.). At this stage, this should especially include the monitoring committees.
  - To dedicate a precise share of the projects of the implementation phase to youth entrepreneurship, political youth engagement activities in the just transition, and education projects in schools and tertiary education.

- **To the European Commission:**
  - To include in the evaluation of TJTPs an assessment of the past and envisaged partnerships with civil society stakeholders, including youth, with concrete recommendations on how to improve their engagement in the implementation phase.
  - To use the existing support mechanisms for state authorities, such as the Just Transition Platform and the Technical Support Instrument, to promote the implementation of the “Toolkit for the participation of youth in the JTF”.
  - To ensure full transparency of the just transition process by making public and easily accessible the TJTPs of Member States as well as the approval criteria and the individual evaluations of each Plan.
• To the European Parliament:

○ **To make use of all its monitoring powers** to make sure the partnership principle remains at the core of the implementation of the Just Transition Mechanism, ensuring in particular that young people are meaningfully engaged in the process.

○ **To commission and disseminate independent monitoring reports on the state of the engagement of stakeholder groups, including youth**, in the implementation of the Just Transition Mechanism.

○ **To regularly welcome local civil society actors and monitoring NGOs to its debates on the state of the just transition** to get first-hand views on how the Just Transition Mechanism is being implemented on the field and what are the main challenges for non-state stakeholders.
About us

**Generation Climate Europe** is the largest coalition of youth-led networks on climate and environmental issues at the European level. GCE unites the largest youth-led networks in Europe bringing together 381 national organisations across 46 countries in Europe. We are guided by the voices of over 20 million young Europeans. Uniting European youth networks, GCE creates a platform for the youth to advocate for a just and green transition in Europe.

**Bankwatch** is the largest network of grassroots, environmental and human rights groups in central and eastern Europe. **We monitor public finance institutions** that are responsible for hundreds of billions of investments across the globe.

The banks and funds we watch are often obscure but always important entities that function outside public scrutiny. Together with local communities and other NGOs we work to expose their influence and provide a counterbalance to their unchecked power.