## POLICY BRIEF June 2023



# **IMPROVING TERRITORIAL** JUSTICE

## TRANSPARENCY, INCLUSIVENESS, **CAPACITY BUILDING AND** STRATEGY IN THE TERRITORIAL JUST TRANSITION PLANS

## ABSTRACT

The EU has set the goal of achieving a just transition in which no one gets left behind. To achieve this objective, member states have created Territorial Just Transition Plans (TJTPs), which lay out the transition processes in regions particularly in need of support during the transition to a carbon-neutral economy. This policy brief showcases the lessons learnt from the TJTP process that can and should further inform and improve other ongoing and future transition processes. It does so by exploring four key areas of interest that are crucial in ensuring effective transition processes, as well as procedural and distributive justice: transparency; inclusiveness; capacity building; and strategy.

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#### Introduction

At 1.1 degrees of global heating in early 2023, the climate crisis and its consequences are already acutely palpable around the globe, and effective climate action is more urgently needed than ever before. The latest IPCC report states clearly and with confidence that we are facing a "rapidly closing window of opportunity to secure a liveable and sustainable future for all".<sup>1</sup> But more than that, it also states that there is a key nexus between the social and climatic components of the crisis: prioritising equity, social and climate justice is pivotal to enabling adaptation to a climate-resilient society.<sup>2</sup>

## "Prioritising equity, social and climate justice is pivotal to enabling adaptation to a climate-resilient society."

The EU has already taken significant steps to acknowledge this problem. In 2019, it adopted the European Green Deal, in which it enshrined the Just Transition Mechanism (JTM). This mechanism aims to allocate funds to EU member states to support them in their transition efforts in the most affected regions in a socially just way. As such, it plays a key role in contributing to a fair transition towards a climate-neutral economy, in which no one gets left behind. The JTM intends to mobilise €55 billion in the period from 2021 to 2027 to be distributed to member states to support their transition efforts. To gain access to these funds, member states need to identify the territories that are particularly in need of support during the transition to a carbon-neutral economy and create Territorial Just Transition Plans (TJTPs) for them. The regions chosen are those with the most carbon-intensive industry and/or those that have a high proportion of people working in fields related to fossil fuels (e.g., mining areas). These regions are most strongly affected by the transition and are of great potential. If the respective TJTPs meet the EU's climate ambitions and are successfully implemented, the affected territories could serve as pioneering examples of a wellconducted, socially just transition.

However, significant divergences have been identified regarding the TJTPs' likelihood of effectively preventing avoidable harm to the most vulnerable in society. Much too often, they tend to focus on economic diversification, whilst side-lining the environmental and social components of the transition. While this will certainly drive an economic transition, the social aspect needed in the TJTPs is non-negligible. If transition plans insufficiently address existing inequalities, or even further entrench them, they might not be able to bring about the necessary social, economic and environmental transformation regions need, and thus, fall short of the EU's just transition ambition to "leave no one behind".3

In a closed-door stakeholder meeting organised by FEPS, members of trade unions, social partners, academics, policy experts and institutional stakeholders from across Europe came together to give their perspectives and discuss discrepancies in the existing plans. This policy brief is a result of these discussions and subsequent desk research. It aims to showcase the learnings of the TJTP process by analysing four areas of interest, which were defined as the most sensitive policy issues and blind spots throughout the drafting process: transparency; inclusiveness; capacity building; and strategy. Concerns arising from the varied analyses of the TJTPs are explored and recommendations are formulated in the hope that lessons learnt from the process can continue to improve ongoing and future just transition processes.

#### How do the TJTPs work

The TJTPs are submitted to the European Commission (EC) by member states. The regions they are created for have been selected in dialogue with the EC, and they detail locallevel transition strategies. As such, the documents are intended to be developed at the sub-regional level through consultation with regional authorities, relevant stakeholders (including civil society) and local community representatives.<sup>4</sup> The TJTPs describe the expected transition processes towards а climate-neutral economy in the areas most affected by the transition (e.g., mining areas), which are, therefore, eligible for funding under the JTM. Furthermore, they detail pathways to a just transition by setting policy targets for those regions. Documents had to be produced for every territory that the member states intend to use the Just Transition Fund (JTF) for, and TJTPs covering 93 territories have been approved by the EC.<sup>5</sup> The plans should take into account the economic, employment, social, environmental and territorial impacts of the transition and outline strategies to best address the challenges that accompany these impacts during the transition processes.<sup>6</sup> The TJTP documents first provide an overview of the transition process, including an evaluation of its economic, social and territorial effects. They then detail the development needs and targets up to 2030 and assess the coherence with other national, regional or territorial strategies. Lastly, they describe the governance mechanisms steering the transition processes.7

#### Transparency

A first area of improvement in the way the plans were developed, as well as in their implementation, is transparency, which is understood as **an essential element for**  procedural justice, that is, a fair process for the allocation of resources and the resolution of disputes. To focus on transparency with reference to the TJTPs, it is important to analyse the accessibility of information, but also to what extent input from civil society and social partners has been taken into account during the deliberation process - especially to avoid the TJTPs being monopolised by certain interest groups.<sup>8</sup> Ideally, the TJTPs should have been developed through consultation with relevant stakeholders, including actors from civil society.9 However, questions remain with regards to how transparent the selection of the projects for the territorial transition have been, what space and accountability is given to deliberation processes, and what divergences exist across different existing plans. In addition, attention should be paid to the necessary oversight and monitoring mechanisms for implementation of the TJTPs.

"Questions remain with regards to how transparent the selection of the projects for the territorial transition have been, what space and accountability is given to deliberation processes, and what divergences exist across different existing plans."

#### **Main concerns**

In practice, a variety of issues have been identified during the analysis of differing TJTPs. Firstly, the values and practices for transparent and just processes are often not clear.<sup>10</sup> Part of the problem is that "just transition" does not enjoy a shared understanding among stakeholders, which renders engagement more difficult.<sup>11</sup> Furthermore, some stakeholders lack resources and capacity to engage, and information on processes is not targeted to them.<sup>12</sup>

A striking example of a failed TJTP process can be seen in the Bulgarian case, in which a lack of transparency and insufficient stakeholder engagement seem to be only the tip of the iceberg, exacerbated by overall political instability. In recent developments, the country lost its TJTP funding for 2022 due to its outright failure to submit the finished plan. In a meeting held by Friends of the Earth Bulgaria in spring 2023, people from one of the towns most affected by coal mining, Galabovo, shared that they had not been consulted about the TJTP by government representatives, despite the nongovernmental organisation observing great public potential in the region.13 Additionally, according to indications of the Department for Regional and Urban Policy, the country risks losing more than half of the funds from the JTF, should the government fail again to get approval for the TJTP within the fixed deadline.

Another concern is that deadlines are often too short, and sometimes **those who need to take part**, for instance, because they hold mandates or have the legitimacy to speak on behalf of portions of the population, **are not invited**.<sup>14</sup> It has been noted that **monitoring committees**  **tend to lack balance, and participation seems to be treated as a "tick-box exercise"**. Furthermore, even though obligations and official requirements exist to ensure member states act in a transparent manner,<sup>15</sup> monitoring committees tasked with ensuring a transparent process are often too general or not targeted enough towards a just transition, which means that the representatives within them are not best suited to discuss and monitor the process.<sup>16</sup>

#### **Policy recommendations**

The urgently needed collective action on climate change will only be taken if processes are perceived to be fair and, by implication, transparent; information and legal tools must be accessible to achieve redress.<sup>17</sup> Improving transparency in the just transition processes and effectively empowering civil society initiatives works towards a bottom-up approach to transition and, as such, counteracts a sentiment that just transition measures are imposed from above. This is why, to alleviate concerns about transparency, the policy recommendations in Box 1 have been formulated.

#### Box 1. Improving transparency in the just transition process.

- In the short-term, guidance, similar to JTF SWD(2021) 275 final,<sup>18</sup> should be codeveloped at the national level with civil society to set out clear implementation requirements and to strengthen civil society.
- In the mid to long term, obligations placed on member states and the transparency standards they should uphold should be made clearer through a revision of the European Code of Conduct on Partnership.
- The capacity of civil society in the region to act as a bridge to marginalised groups and groups with lower capacity should be boosted. This could be achieved through deploying municipal and independent just transition support in the regions, for example, through a dedicated just transition officer, which could help to unlock the full potential of the just transition project.

#### Inclusiveness

To achieve a truly just transition, in accordance with the ideals of the European Green Deal, it is imperative that adverse effects of the transition on marginalised groups are considered, and mechanisms to counteract them are outlined in the TJTPs. This area for improvement focuses on inclusiveness, which is understood as the perceived fairness of the outcomes of the TJTPs from the vantage point of distributive justice. To do so, it is firstly important to identify who is particularly affected by the transition. One key aspect in this is employment. In leaving no one behind, do the TJTPs only safeguard existing fossil fuel jobs at risk from the green transition?<sup>19</sup> Or do they also provide mechanisms to support those already left behind by, or on the margins of, the fossil fuel industry? EU wide, roughly 253,000 people are employed in jobs related to the fossil industry, the majority of them in coal mining, followed by peat extraction and shale oil production. However, wages in the energy sector are typically higher than the economy-wide average, and established fossil fuel industries tend to have better labour protections and union representation than, for example, jobs in the solar sector. Furthermore, there are also a great number of additional jobs that indirectly depend on the fossil fuel value chain, and there will be a dire need for significant reskilling, upskilling and reeducation.<sup>2021</sup>

"It is imperative that adverse effects of the transition on marginalised groups are considered, and mechanisms to counteract them are outlined in the TJTPs."

There is a large body of evidence that points to the disproportionate vulnerabilities of those

already at the margins of society. For example, women tend to have fewer resources and access to education and are often excluded decision-making and information from about the green transition;22 those who find themselves at the intersection of different forms of marginalisation are even more affected. The question must then be asked whether the TJTPs also include a perspective on those people experiencing differing kinds of marginalisation: young people; people experiencing poverty, gender and racial inequality; and/or those who have a migrant background, among others. Along these lines, it is interesting to observe existing divergences on this subject matter across different existing TJTPs. At its core, analysing the inclusiveness of different TJTPs seeks to answer the guestion whether the existing plans hold the potential to act as fertile ground for stronger, more resilient local **communities**, or if, conversely, those already affected by societal injustices have not been sufficiently considered and risk getting left behind once more.

#### Main concerns

A variety of concerns have been identified regarding the inclusiveness of the TJTPs. In terms of the inclusion of women, ethnic minorities and youth, there have been mixed results, but most of the time the discussion is flawed by the lack of socioeconomic data. Furthermore, a recent policy brief published by FEPS comparing seven TJTPs observed that not all plans made mention of marginalised groups.<sup>23</sup> Indeed, even the plans that do mention marginalised groups often seem to lack specific targets to address the challenges that they find themselves confronted with.24 That is to say, most of the time, there are no specific provisions for specific vulnerable groups (women, the disabled, youth, minorities) in the plans. Focusing on the example of gender

equality, the World Wide Fund for Nature (WWF) assessed that out of 13 TJTPs analysed, only two proposed specific measures on gender inequality and two failed to mention the problem explicitly.<sup>25</sup>

Furthermore, there was a feeling among multiple participants of the inclusiveness workshop that the narrative presented in the TJTPs was not always correct. The plans tended to convey a negative feeling with regards to the ecological transition, making it seem like something imposed by the EU or the government. This is concerning, not only taking into account increasing anti-European and nationalist sentiments in many countries, but also because it shows that those inhabiting the regions most affected by the transition are not encouraged to see it as an opportunity towards a more just society as a whole, a shortcoming that risks hindering the transition efforts to the detriment of all.

#### **Policy recommendations**

Considering that many plans have now been approved by the EC, shortcomings regarding inclusiveness can now be addressed in the implementation phase of the plans. Several key recommendations emerge from these considerations (Box 2).

#### Box 2. Improving inclusiveness in the just transition process.

- There is a need to transform and reframe the just transition narrative to better consider a gender dimension, youth and ethnic minorities. Outreach, specifically to marginalised groups, should, therefore, be promoted strongly during the development and monitoring of projects implemented under the TJTPs. Such work could improve future developments in the inclusion of the plans. In terms of creating broader public support, the message that the energy crisis is exposing the limits of fossil fuels needs to be better integrated with the just transition message.
- The EC should provide support to civil society to rectify some of the shortcomings of national plans. A more systematic inclusion of social indicators in the assessment of projects could ensure the TJTPs build communities rather than participate in increasing socioeconomic polarisation.
- The EC should **monitor the situation of the most vulnerable and minority groups** by building capacity for data collection on such issues, for example, through Eurofound, which would be a great help, especially in Eastern Europe.

#### **Capacity building**

Different EU member states have varying capacities to respond to the challenges of the ecological transition.<sup>26</sup> To ensure an effective transition and to implement ambitious TJTPs, it is, therefore, crucial not only to identify the causes and consequences of these differences, but also to ask how these can be remedied. Transition regions are expected to be innovative and pioneering, yet this is not where such capacities have been located in the last decades. In particular, the affected regions have experienced brain drain, ageing populations, high migration and high unemployment rates.<sup>27</sup> Consequently, it is important to interrogate how both institutions and civil society can provide support to ensure effective capacity building. To do so, attention needs to be paid to the kind of technical assistance that would be needed.

Furthermore, the question must be asked how public and private sector, as well as civil society initiatives, can collaborate on a local level.

"It is important to interrogate how both institutions and civil society can provide support to ensure effective capacity building."

#### Main concerns

There are a variety of concerns regarding the aspect of capacity building. Firstly, the situation and capacities of regional and local-level public administrations (as well as other entities) are very heterogeneous. The breadth of knowledge gaps and capacity constraints is wide. Different types of capacity building would be needed (Box 3).

#### Box 3. Types of capacity building.

- "Substantive capacity", relating to technical knowledge necessary to conceive, design and eventually implement transition projects, but also knowledge about the region, such as data registers, as well as knowledge about policy and experience of what did and did not work in the past.
- **"Creative capacity"**, relating to the ability to come up with new and innovative (project) ideas for the future development of a region.
- **"Administrative capacity"**, relating to procedural knowledge, for example, to identify suitable funding opportunities and to prepare funding proposals accordingly.
- "Process capacity", relating to ongoing engagement and monitoring of implementation
  of TJTPs and individual projects. There is a lack of knowledge about what technical
  assistance activities and delivery mechanisms are effective for developing local-level
  capacities necessary for successful policy and project implementation. There is a need
  for better assessment of the performance and outcomes of technical assistance and
  sharing of "lessons learned" that could improve delivery and absorption of support.
- "Ad hoc/specific capacity", such as foreign language capacities (especially English).28

It is also important to note that technical assistance and capacity-development instruments need to be attuned to the differing local and regional capacity conditions. It is evident that many local administrations lack the necessary capacities to effectively contribute to successful implementation of TJTPs. Even if local administrations have knowledge of the more social aspects of transition, they probably lack adequate knowledge of more technical aspects, such as the decarbonisation of energy systems. This leads to the risk that regional and local administrations, lacking their own capacity, will be dependent on other actors - notably, private businesses - to identify, propose and develop projects suitable for JTM/ JTF funding. By extension, there is a risk that established actors will remain better placed than "new actors" (such as local or smaller entities) to shape policies and apply for project funding and, consequently, may monopolise the use of JTM/JTF funding.<sup>29</sup> On one hand, these established actors may have a vested interest in largely preserving the current situation rather than reimagining or reinventing a region. This is also reflected in resources already approved under the JTF. According to the WWF, almost €1.4 billion of the €15.2 billion approved to date is planned to directly support large enterprises,

many of which are part of polluting industries.<sup>30</sup> Furthermore, this takes away funding from activities that would be directly beneficial for communities in adapting to the demands of the transition. On the other hand, this could result in a narrow emphasis on projects in the economic or energy spheres to the benefit of established actors, while neglecting wider social, environmental and other dimensions of a just transition. Addressing capacity gaps and constraints requires not only short-term technical assistance or capacity-building efforts, but equally adequate financial means to maintain the capacities over time. Accordingly, there needs to be an appropriate allocation of local budgets.

#### **Policy recommendations**

To improve capacity building, technical assistance and capacity-building instruments should ensure that sufficient attention is paid to enabling and engaging actors with relevant local knowledge and expertise in the conception and/ or delivery of technical assistance activities (Box 4). This should include actors with an understanding of the location's historical policies, progress and plans.

#### Box 4. Improving capacity building in the just transition processes.

 A "fly in, fly out" approach to technical assistance delivery is not appropriate for creating capacities that need to be maintained over the course of TJTP implementation/transition processes. Technical assistance – including if it is delivered by "external" suppliers – should aim to build and strengthen capacities that will remain in the region (e.g., through capacity building and training targeting local recipients).

- Delivery of technical assistance must build on local knowledge and leave a legacy of enhanced local capacity. Attention should be given to developing and utilising technical assistance capacities within the region or, where more appropriate, at national level, to retain local knowledge capacity, particularly in areas facing depopulation and brain drain.
- Although (technical) expertise exists across different levels (EU, national and regional), local actors lack information on its availability and on how it can be accessed. It thus follows that special efforts need to be made to ensure that local actors are aware of existing technical assistance, such as that being established under the Just Transition Platform, and that access to expertise and knowledge is not language dependent.
- Regional "idea incubators" could be created to alleviate capacity constraints
  related to creativity, by providing a space that enables and promotes creative and
  innovative approaches to transition and giving a new vision or project ideas for the
  transformation of a region. In this regard, there is also a need to bring together actors
  that may have creative ideas for transition projects with those that have requisite
  knowledge of funding schemes and capacities to deal with funding processes.
- To support TJTP implementation, consideration should be given to allowing JTF (or other) monies to be used not only to support specific projects, but also to support ongoing development and to the maintenance of local capacities for project development and implementation and monitoring activities. In that way, local administrations or regional just transition centres would get funded directly.
- Incentivise local public administrations to be more involved in the implementation of TJTPs. In this respect, it could be helpful to place some form of (legal) requirement on local administrations to become actively involved (e.g., a requirement for local transition plans and/or the identification of transition projects), which, in turn, may push them to seek out available technical assistance or capacity-building support mechanisms.

#### Strategy

Whilst the TJTPs are, of course, only part of a larger array of instruments that the EU has at its disposal, **the strategy**, nevertheless, **needs to be coherent with other funding instruments** 

in place (such as RePower EU or the Recovery and Resilience Facility) to effectively move the transition in the right direction. Focusing on the overall long-term strategy set out in the TJTPs, it is firstly important to identify which sectors the TJTPs focus on and why, as well as how their diverging sectoral strategies can be coordinated for further impact. In particular, economic activities in the fossil fuel industry are expected to face an irreversible decline – with direct consequences for those employed in polluting industries and related sectors. However, and with regards to inclusiveness, the question remains whether TJTPs should only protect those who have jobs in the fossil fuel system, or whether they should instead ensure that those already left behind by this system no longer are, by making sure to empower local communities to become an integral part of the economic and ecological transformation of our societies.

Furthermore, it is of vital importance to take into account the conditions under which the ecological transition is taking place, notably, the ongoing polycrisis (the recent COVID pandemic, the climate crisis and its effects, the war in Ukraine, the energy crisis, inflation). How do the existing TJTPs work, and are they agile and prepared to react to fast-changing risks? It is also important to find out how the TJTP process can be solidified and how alignment and policy coherence with national energy and climate plans (NECPs) or even higher climate ambitions, such as the Climate Law, can be increased. And, lastly, it is important to ask what elements of strategy are lacking in the policy process so far, and what policy spaces are to be occupied to make up for these.

"The question remains whether TJTPs should only protect those who have jobs in the fossil fuel system, or whether they should instead ensure that those already left behind by this system no longer are by making sure to empower local communities to be actors of change."

#### Main concerns

Due to the ongoing polycrisis, the risk of negative impacts on the transition process is high, including backlash against any form of effective climate action. Therefore, strategies must be created in such a way that they are easily adaptable and flexible to quickly changing circumstances to face and mitigate the prognosed deepening of the polycrisis. However, the just transition planning process has been relatively fast.<sup>31</sup> EU and national response measures to the recent energy crisis reveal that the existing crisis-response strategies lack coordination and fall short of ensuring a just transition.<sup>32</sup> Furthermore, recent comments, such as those of the French and Belgian heads of government, asking for a European regulatory break for environmental standards, demonstrate that many challenges remain in the guality of coordination between the European, national and local/regional levels.33

For the just transition process to be successful, strategies should focus on the increased decentralisation of social capacity and research and innovation capacities. Despite the planning process in place, typically, strategies and plans are short or medium term, and are not followed through by successors to the process (e.g., following elections), thus focus must be paid to maintaining processes following such political and administrative changes. If the processes there go badly, a backlash against the European Green Deal can be expected. Until now, the TJTPs unlock funding over the seven-year time span from 2021 to 2027, which is a concern, considering that the transformation towards a more sustainable future will span decades.

#### **Policy recommendations**

Several key policy recommendations emerge from these concerns. One of the most important aspects of a just transition strategy must be the introduction and development of administrative capacity, including personnel. The success of the just transition process will require increased decentralisation of social capacity and research and innovation capacities to unlock higher climate ambition, longer-term planning, as well as a more integrated vision of the EU's funding instruments on the ground (Box 5). "The just transition process will require increased decentralisation of social capacity and research and innovation capacities to unlock higher climate ambition, longer-term planning, as well as a more integrated vision of the EU's funding instruments on the ground."

#### Box 5. Strategy for improving the just transition process.

- Decentralisation strategies should be introduced to ensure availability of highcapacity personnel, research and innovation, employment opportunities and better quality of life in just transition regions. Furthermore, strategies must include activities related to maintaining high transparency levels (especially of the fundspending and project-implementation processes), developing local, regional and national "transition" capacities, communications and awareness-raising activities.
- The fact that, sometimes, TJTPs are indeed more ambitious than NECPs can and should be made use of to force more ambition and to improve strategising at the national level for the necessary energy transformation.<sup>34</sup>
- The policies concerning decision-making bodies at the national and regional levels (such as monitoring committees) should be reworked to ensure higher transparency and participation of various stakeholders. Furthermore, there should be more integration of different funds and strategies for more effective coordination.
- Regarding the polycrisis, all strategies must take into account its prognosed deepening and include measures to lower its impact. TJTPs have to be created in such a way that they are easily adaptable and flexible to quickly changing circumstances. For this to be effective, the changes in strategy of the TJTPs need to be constantly monitored by all relevant stakeholders to ensure they are heading in the right direction.
- For TJTPs to be effective in reaching the goal of a socioeconomic transformation, a more long-term vision and planning are needed to ensure the continuity of the transition processes. Therefore, stakeholders (including institutional stakeholders) should seek to ensure that learnings and priorities from TJTPs inform the ongoing revision and implementation of NECPs and long-term strategies.

### Conclusion

As the climate crisis accelerates, so do the challenges that come along with an ecological transition. The JTM put in place with the European Green Deal carries a lot of potential. However, as analysed within this policy brief, the TJTPs and the implementation of their ambitions leave much room for improvement to create a truly just transition, in which no one gets left behind. The two first key areas this policy brief focused on transparency and inclusiveness based on two of the pillars of climate justice: procedural and distributive justice. These pillars have to be part and parcel of any successful adaptation strategy - a strategy that can only be put into place, if the necessary capacities are strengthened and built within the just transition regions. Depending on whether or not the potential within the JTM is fully utilised, these regions, each and every one strongly affected by the impacts of the highcarbon and fossil fuel industry, could remain a stark reminder of social and environmental inequalities for years to come. Or they could become concrete examples of how a truly just transition can be achieved.

#### Glossary

EC	European Commission
JTF	Just Transition Fund
JTM	Just Transition Mechanism
NECPs	National energy and climate plans
TJTP	Territorial Just Transition Plan
WWF	World Wide Fund for Nature

### Endnotes

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2 Ibid, p. 31.

3 See also "Summary report: Territorial Just Transition Plan scorecard assessment". WWF, February 2023, p. 7.

4 "How does your Territorial Just Transition Plan shape up? Get your score". WWF website.

5 Rösch, L. B. and D. Epifanio (2022) "Just transition in 7 central and eastern European countries – what works and what does not". Policy Study. CEE Bankwatch Network, p. 8. European Commission (2023) "Seventh Just Transition Platform Conference provides a forum to share successes and challenges". 12 May 12.

6 "Summary report: Territorial Just Transition Plan scorecard assessment". WWF, p. 5. "The Just Transition Mechanism: Making sure no one is left behind". European Commission website.

7 "Just Transition Platform". European Commission website. Stapper, M. (2023) "The road to a just transition". Policy Brief, Foundation for European Progressive Studies.

8 "Summary report: Territorial Just Transition Plan scorecard assessment". WWF, p. 15.

9 The climate protests of recent years have made it clear that citizens are strongly moved by concerns about the impact of the climate crisis on their lives, and citizen assemblies organised by groups such as Extinction Rebellion show that civil society actively wants to participate in a green transition. See also Akgüc, M., K. Arabadjieva and B. Galgóczi (2022) "Why the EU's patchy 'just transition' framework is not up to meeting its climate ambitions". p.5.

10 "Summary report: Territorial Just Transition Plan scorecard assessment". WWF, p. 15.

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13 Kojouharova, V. and T. Todorov (2023) "Stara Zagora: caught between its brown coal past and a bright green future". CEE Bankwatch Network Blog, 30 March.

14 Mustață, A. (2020) "Status of Territorial Just Transition Plans in central and eastern Europe October 2020". CEE Bankwatch Network, 14 October, p. 4. "Summary report: Territorial Just Transition Plan scorecard assessment". WWF, p. 15.

15 Schreuder, J.H. (2022) "Status of Territorial Just Transition Plans in central and eastern Europe: October 2022 update", (CEE Bankwatch Network), p. 8. For example, in October 2022, Slovakia had not yet established a monitoring committee.

16 Rösch, L. B. and D. Epifanio (2022) "Just transition in 7 central and eastern European countries – what works and what does not". p. 16. Bankwatch cites a lack of genuine stakeholder engagement in the Lubelskie region in Poland.

17 Newell, P., S. Srivastava, L. O. Naess, et al. (2021) "Toward transformative climate justice: An emerging research agenda". *WIREs Climate Change*, 6(12): e733. DOI: 10.1002/wcc.733. Tomlinson, L. (2015) *Procedural Justice in the United Nations Framework Convention on Climate Change: Negotiating Fairness* (Cham: Springer), p. 61.

18 European Commission (2021) "Commission staff working document on the Territorial Just Transition Plans". SWD(2021)275, 23 September.

19 Akgüç M., K. Arabadjieva and B. Galgóczi (2022) "Why the EU's patchy 'just transition' framework is not up to meeting its climate ambitions". ETUI Policy Brief, June, p.3. Most jobs in the coal-based power sector will disappear within a decade, with severe regional consequences. The loss of employment, and the consequences it has on families and livelihoods, is the direct social impact of the transition to climate neutrality (see also European Commission (2021) "Commission staff working document on the Territorial Just Transition Plans"). Many TJTPs do not list prospective job losses or gains. The German TJTP only lists job losses in the fossil fuel industry (see also Stapper, M. (2023) "The road to a just transition").

20 European Commission (2021) "Commission staff working document on the Territorial Just Transition Plans". p. 4.

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#### About CEE Bankwatch Network

The CEE Bankwatch Network gathers 16 member groups in 14 countries in central and eastern Europe, the Caucasus and Russia into the largest network of grassroots, environmental and human rights groups in central and eastern Europe.

CEE Bankwatch has its headquarters in Prague, Czech Republic, but their staff is based in offices across the regionand in Brussels.

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#### About SOLIDAR

SOLIDAR is a European and worldwide network of Civil Society Organisations (CSOs) working to advance social justice through a just transition in Europe and worldwide. With over 50 member organisations based in 26 countries (19 of which are EU countries), member organisations are national CSOs in Europe, as well as some non-EU and EU-wide organisations, working in one or more of our fields of activity.

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