



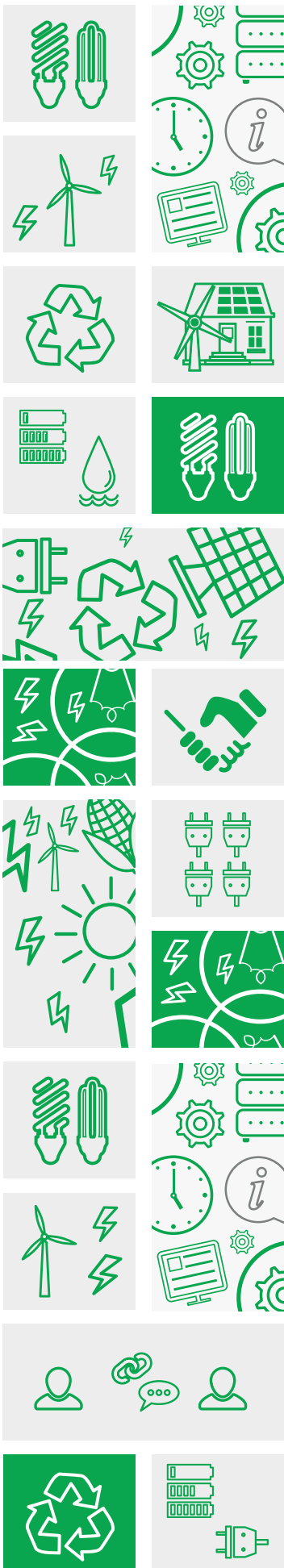
CIVIL SOCIETY'S POSITION ON THE JUST TRANSITION OF UKRAINE'S COAL REGIONS



Russia's full-scale invasion has delayed the plans and strategies of coal communities for a just transition. The war is exacerbating the problems of these communities: critical infrastructure is being destroyed, and coal mines are being flooded with all the attendant consequences, in addition to the existing environmental problems caused by the coal industry. And people are forced to leave their communities. However, the just transition will undoubtedly be one of the most important trends in the post-war revival of the destroyed territories, creating the conditions for their further sustainable economic and social development in a climate-neutral world.

Considering the toll of destroyed and damaged thermal power generation in Ukraine due to Russian attacks, the inevitable end of the coal era is near. The support for coal communities is even more essential despite the wartime challenges, considering that some communities have more opportunities to work on just transition right now, while others still can learn from them, implement soft projects, and envision their transition for the times when it will be possible considering the safety situation. It's important for the [European Commission to continue its support for Ukrainian coal regions](#) throughout the ongoing war so that coal communities are not left behind, while the coal phase-out in electricity generation is still expected before 2035, and Ukraine is driving closer towards being a member of the European Union.

- Energy security issues should be solved not only by rebuilding infrastructure but also by shifting the focus to low-carbon and energy-efficient technologies, with the development of distributed generation from renewable energy sources.
- Solving issues of environmental and technogenic safety should involve overcoming the problems that arose both as a result of the coal industry's functioning in previous years and the destruction caused by the military actions, as well as taking into account the impact on the health and quality of life of the population.
- Economic recovery and development of coal communities should include economic diversification, take into account their key characteristics and state of their resource potential, and promote sustainable development.
- Repurposing the infrastructure of coal enterprises to create industrial parks, production centres, and logistics centres should be seen as a means of creating green jobs and solving the socio-economic problems of coal towns and communities.
- The restoration of coal communities should include reforming the education system, career guidance, professional retraining, bridging the digital divide and ensuring the qualifications of people of different age groups.
- When implementing the necessary structural changes, it is important to consider the need to mitigate social consequences and to include gender equality and barrier-free access to employment, education, social services, public spaces, etc.



In October 2023, representatives of the Ministry of Communities, Territories and Infrastructure Development announced the revival of the development of the State Target Program for the Just Transition of Coal Regions until 2030, following the relevant Concept adopted on 21 September 2021.

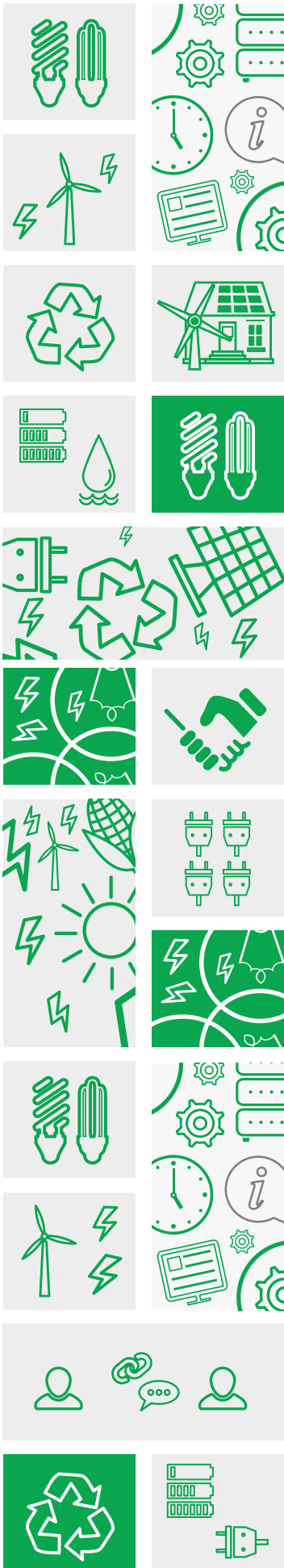
The unique challenges of coal communities that need to be addressed in the transition process include employment and economic development, environmental protection, and ensuring the sustainability of the energy system. At the same time, a number of coal communities have their own unique, previously underutilised potential, such as in the processing industry, agriculture, tourism, logistics, etc.

Some coal communities are currently located in the occupied territories or close to the frontline and have suffered significant destruction, making it impossible to fully recover until Russia's military aggression ends. However, a vision for restoring such communities should be created today to lay the groundwork for a future just transition.

As Ukraine plans to phase out coal in the electricity sector by 2035, it is essential that the State Target Program for the Just Transition covers the entire transition period.

Despite the uncertainty of further developments in the Russo-Ukrainian war, measures should be considered that target both the territories controlled by Ukraine and the temporarily occupied territories from 2014 and 2022. In addition, representatives of local authorities and civil society organisations should be involved at all stages of the development of measures and decision-making to ensure the active participation of all stakeholders in the continued implementation of the principles of the decentralisation reform.

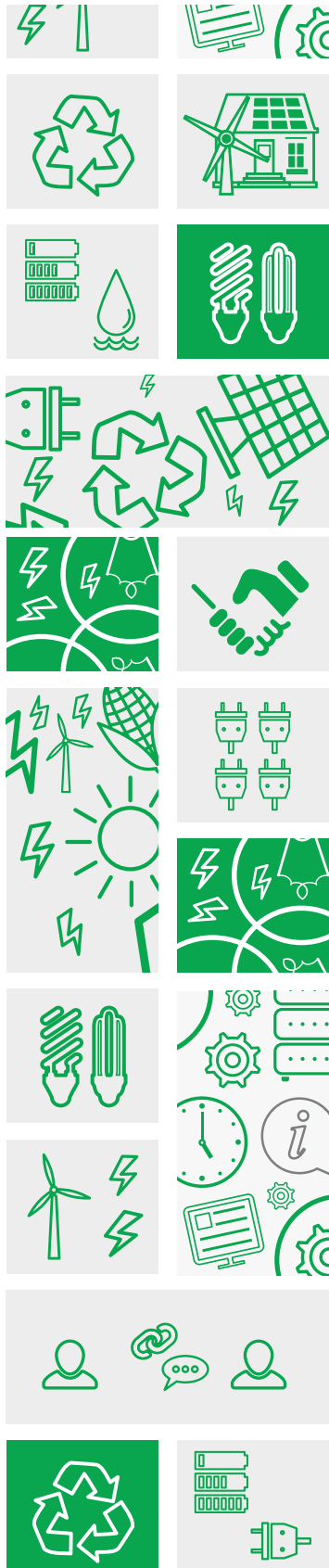
To support the coal communities in their quest for a just transition, civil society **calls for the following recommendations to be considered in the further development of the State Target Program for the Just Transition of Ukraine's Coal Regions, based on previous developments, and taking into account new challenges.**



The recommendations are divided into the following groups:

- 1.** Switching to renewable energy sources and improving energy efficiency;
- 2.** Solving environmental problems and combating climate change;
- 3.** Diversifying the local economy based on the existing economic and human potential;
- 4.** Mitigating the negative social consequences of the closure and transition of coal enterprises, human capital development.

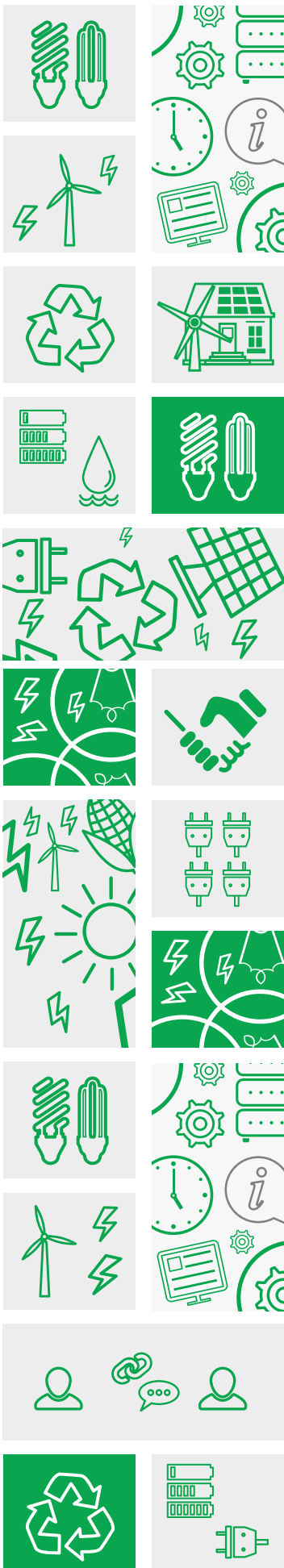
SWITCHING TO RENEWABLE ENERGY SOURCES AND IMPROVING ENERGY EFFICIENCY



Measures to strengthen **energy security** in the reconstruction of mono-industrial coal communities should include restoring the energy infrastructure and the restructuring of the economy based on clean, low-carbon and energy-efficient technologies. It is important to focus on energy diversification and changing the generation structure.

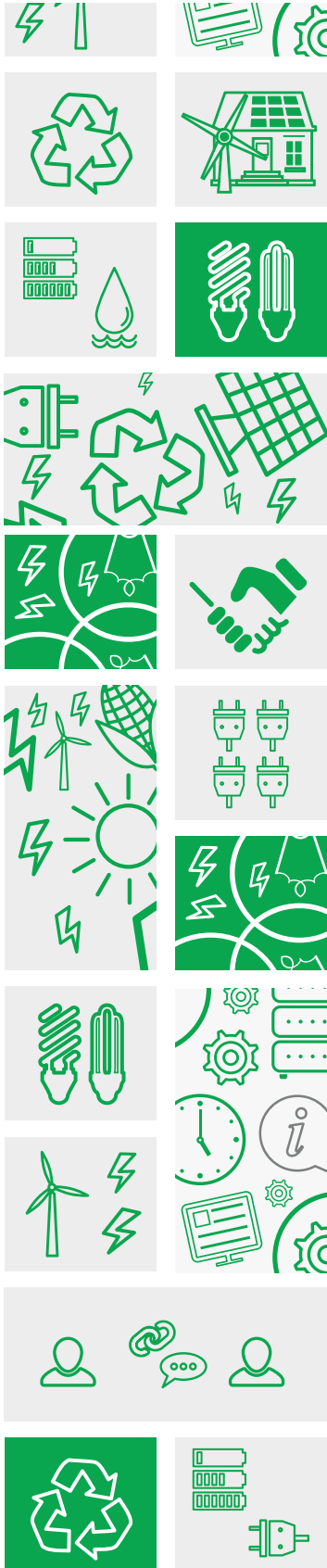
Thus, in addition to rebuilding and modernising critical infrastructure, it is important to **focus on:**

- development of decentralised (small) generation from renewable energy sources in communities;
- strengthening the assessment of available resources that can be used for the development of RES for electricity and heat generation in coal communities to develop real projects;
- decarbonising heating by gradually replacing gas and coal with renewable energy sources and heat pumps;
- development of bioenergy based on the "second generation" of biomass, which will comply with the updated EU Renewable Energy Directive (RED III), for heat and electricity production (after bringing Ukrainian legislation in line with EU standards);
- modernising water supply infrastructure through the use of solar pumping systems to ensure reliable and sustainable water supply while minimising dependence on the power grid or fossil fuels;
- creating conditions for external transfer of technologies and innovative solutions to implement technological solutions based on renewable energy;
- creating favourable conditions for the creation of energy communities;
- energy monitoring and energy management, focused on tracking energy transition processes and ensuring the energy sustainability of the industrial sector of coal communities;



- attracting qualified personnel to local authorities and regional development agencies to implement just transition measures and RES projects through the development and implementation of motivational tools;
- drawing up an energy balance of industrial production with a special focus on tracking and monitoring the energy sustainability of carbon-dependent industrial enterprises in communities;
- assessing and identifying ways to tap the potential of coal enterprises to produce renewable energy through the use of underground infrastructure;
- supporting decisions on the use of existing networks, infrastructure of abandoned coal mines and residual resources associated with the coal industry:
 - engineering networks of mines,
 - communication networks of mines,
 - mine water potential - for example, reuse of mine water for energy needs (heating, etc.);
- taking measures for degassing during the operation of coal deposits with high levels of gas (methane) concentration;
- developing a program of measures to promote renewable energy technologies and facilitate their scaling up at the local level;
- conducting information and advocacy campaigns to promote renewable energy solutions;
- creating conditions for fair competition among communities seeking to implement RES and other projects, with the possibility of attracting technical assistance;
- cooperation with research institutes to develop and implement innovative projects and novel approaches to the energy transition.

SOLVING ENVIRONMENTAL PROBLEMS AND COMBATING CLIMATE CHANGE

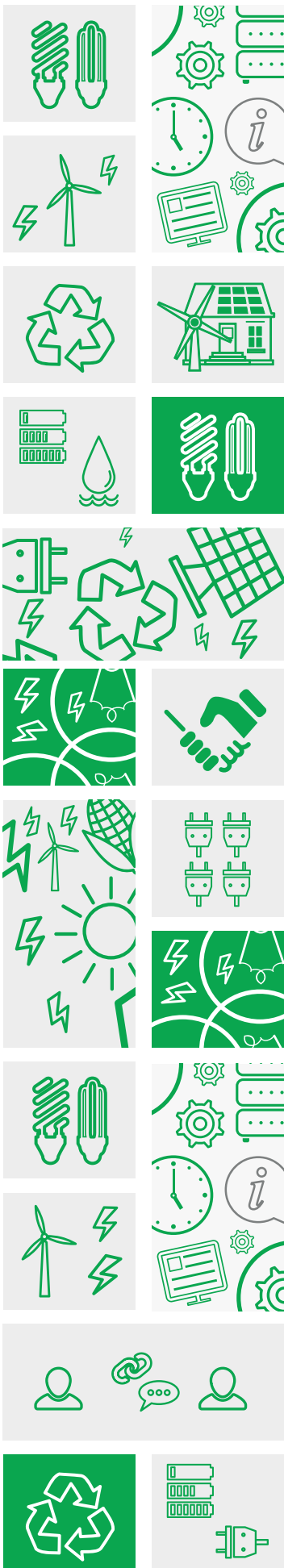


Environmental and technogenic safety should be at the centre of management decision-making. Flooding of coal mines due to power outages causes and exacerbates a number of environmental risks associated with pollution of surface and ground waters, and soil. This creates a high probability of anthropogenic disasters, the prevention of which requires significant financial resources and the latest technological solutions. The consequences of the operation and flooding of mines cause a deterioration in the health of people who are forced to consume contaminated water and food. Even before the outbreak of war in 2014, water, air and soil pollution in coal communities was significant. Due to Russian aggression, the negative effects of enemy shelling have been added to this list.

Therefore, it is important to prevent further deterioration of the environment and, at the end of the active phase of hostilities, to investigate their consequences and focus efforts on restoring natural ecosystems and reclaiming the affected areas.

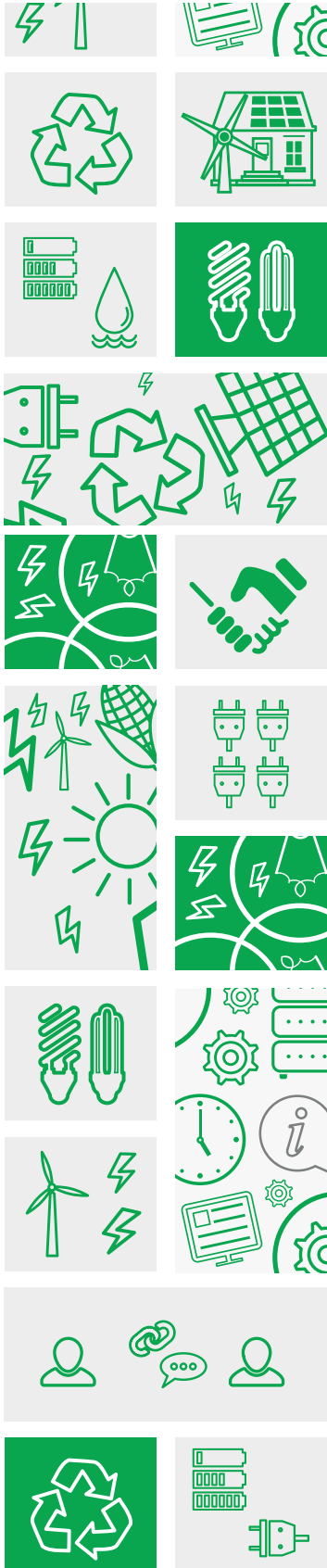
Therefore, it is **necessary to plan the following measures:**

- establish and maintain systems for monitoring the state of surface and ground waters, air and soil, as well as unify the methods and equipment of environmental monitoring systems in accordance with EU standards;
- conduct a comprehensive environmental audit of coal regions after the active phase of hostilities is over, to substantiate the quantitative parameters of anthropogenic changes in the environment and the technogenic burden on communities affected by the coal mining industry, and to analyse the safety of the enterprises that continue to operate;
- monitor environmental safety (underground and surface coal mining processes, technological processes, etc.);
- create information and reference systems for environmental and geochemical data on coal communities;



- develop local environmental and geochemical monitoring programs to justify measures for the safe use of drinking water by the population and explore the possibility of using coal mine water as process water;
- focus regional environmental policy on ensuring environmentally friendly restoration of territories;
- take measures to restore the environment in areas affected by coal mining and/or mine flooding, including remediation of flooded territories, clean-up and reclamation of contaminated land, restoration of soil fertility, greening of waste heaps, waste disposal (including accumulated highly toxic waste) and wastewater treatment;
- manage coal mine water to limit environmental threats after the end of coal mining operations, restore and stabilise drainage from flooded mines to maintain groundwater levels at safe depths, and purify mine water;
- develop an Environmental Security and Climate Change Adaptation Strategy in each community, which may include a "green map" with a list of priorities and projects related to just transition;
- identify measures for sustainable management of coal industry waste and waste heaps and reduce their environmental impact, including research on the composition and possibilities of their use;
- identify the specific set of environmental factors affecting the health of residents in order to set priorities for the establishment of a public health system;
- systematically conduct advocacy and information campaigns on environmental improvement measures for a just transition.

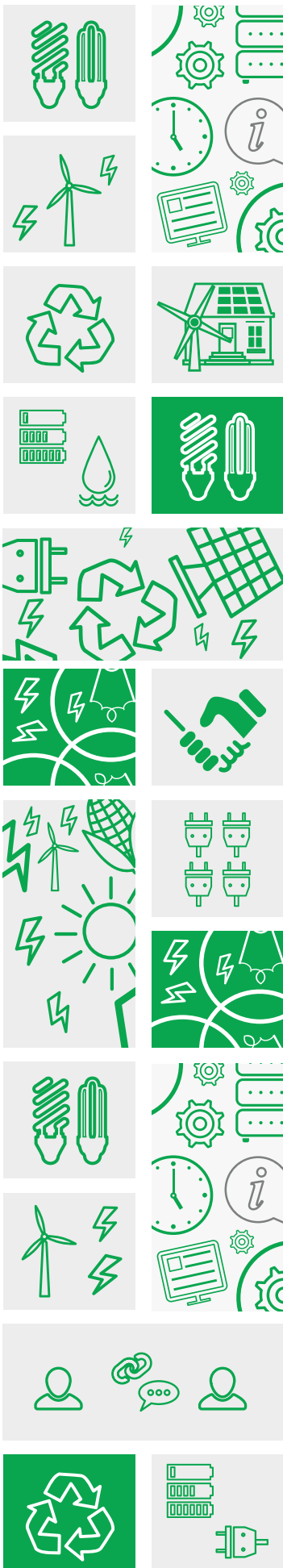
DIVERSIFYING THE LOCAL ECONOMY BASED ON THE EXISTING ECONOMIC AND HUMAN POTENTIAL



A just transition should include the **restoration of the economy of** coal communities through a focus on low-carbon sectors, energy efficiency, environmental friendliness, efficient and clean production, and balanced consumption. To achieve these, the following principles should be considered: shared responsibility, innovation, cooperation, solidarity, flexibility, and interdependence. To take into account the specifics of coal regions in the process of planning Ukraine's recovery, it is important to consider the specifics of each individual community and its development potential and create conditions for the creation of new points of economic growth, taking into account the existing economic and human potential to diversify the economy of coal communities with a special focus on the development of renewable energy.

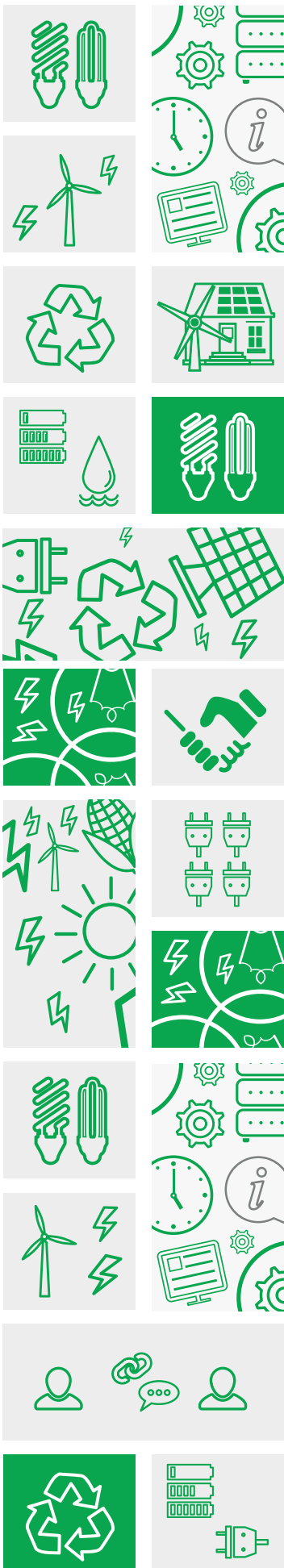
This requires:

- studying the prerequisites and needs for attracting investment in coal and other mono-industrial communities, in particular for the generation of electricity from renewable sources and the production of equipment for the generation of electricity and heat from renewable sources;
- developing unique perspective profiles of communities, taking into account pre-war assessments and changes that have occurred as a result of Russia's military aggression;
- searching for opportunities for alternative use of industrial sites and facilities, production elements of coal enterprises, as well as production chains related to the coal industry;
- re-profiling of enterprises related to the coal industry;
- conducting research on the possibilities of attracting the potential (surface and underground elements) of coal enterprises that are being liquidated for use in new types of economic activity (with alternative purposes);
- assessing the potential and possibilities of processing anthropogenic raw materials and coal mine water from coal



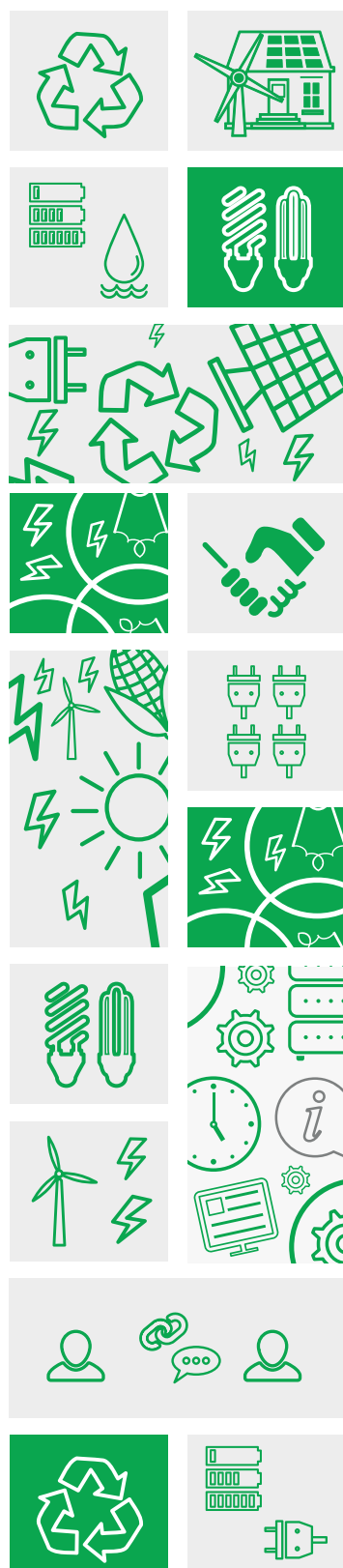
deposits on an industrial scale to ensure diversification of the local economy and identify the economic potential of coal communities not related to the coal industry;

- supporting the implementation of inter-municipal cooperation in solving problems in the course of a just transition;
- diversifying the economy through the development of small and medium-sized enterprises by:
 - systemic support for businesses in market niches individually identified for each community through, among other things, the creation of special programs and funds,
 - development of the industrial potential of coal communities by facilitating the involvement of small and medium-sized businesses in this process;
- implementing pilot projects in coal communities to develop economic potential not related to coal mining, including support for business initiatives in the green circular economy;
- creating joint investment-attractive community products (industrial parks, prepared land plots for investment);
- creating new high-added-value production chains and encouraging their inclusion in existing ones at the national and international levels;
- developing innovative entrepreneurship and creative industries;
- strengthening the economic capacity of coal communities by integrating relocated enterprises into the local economy;
- integrating the tasks and goals of just transition into existing strategic documents at the national, regional and local levels;
- coal mine administrations providing rental services for premises that are no longer in use;
- developing the economy of coal communities to meet military needs;



- involving specialists in attracting financial resources for local authorities;
- developing and supporting family and social entrepreneurship to create new opportunities for residents of coal communities, namely:
 - supporting the creation of microenterprises,
 - supporting social entrepreneurship to provide social services such as elderly care, adult and children's learning centres, and projects that promote environmental sustainability,
 - providing access to start-up capital through grants, low-interest loans, and investments,
 - ensuring access to opportunities for all population groups, including women, youth, people with disabilities, etc,
 - developing local markets,
 - providing support with experienced mentors, with creation and support of networks of entrepreneurs, which will facilitate the exchange of knowledge and experience and strengthen social cohesion in the community;
- changing the identity of communities, taking into account the coal mining heritage and creating cultural and tourist brands, promoting a new vision of coal communities;
- supporting the involvement of educational institutions and NGOs from coal communities in joint cultural heritage projects with other countries, for example, through EU programs.

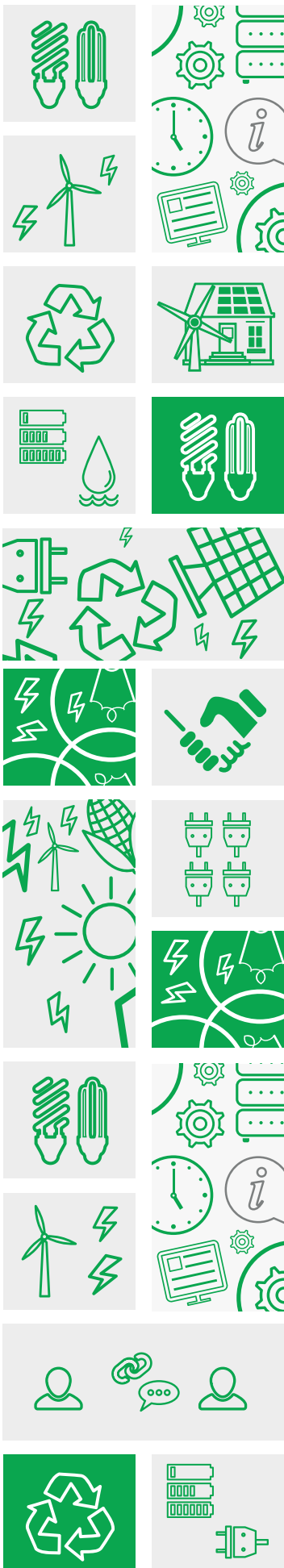
MITIGATING THE NEGATIVE SOCIAL CONSEQUENCES OF THE CLOSURE AND TRANSITION OF COAL ENTERPRISES, HUMAN CAPITAL DEVELOPMENT



Human capital development is necessary to reorient the economy in line with low-carbon, energy efficiency and environmental priorities. Due to Russia's military aggression, education and science have faced significant challenges related to the destruction of educational infrastructure, migration of education workers, and the increase in the number of IDPs.

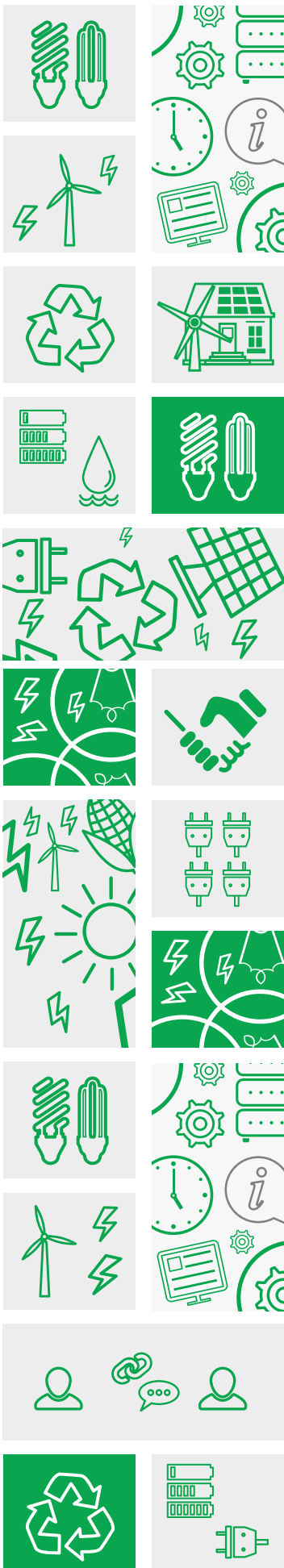
To overcome financial, infrastructural and human resource challenges, **it's necessary to ensure:**

- creating offline/online programs and training for residents and IDPs from coal communities;
- developing programs for professional training and retraining of specialists of different age groups, including digital literacy training;
- re-profiling of employees of coal enterprises, which can take place in a related industry (e.g. construction, which will be especially relevant during the recovery period) or another field that does not require long-term retraining and allows them to start working in a short time, in particular before the end of hostilities;
- re-profiling of existing vocational schools to include programs focused on environmental and energy disciplines that meet the needs of decarbonisation and transition of coal regions;
- establishing inter-municipal cooperation in the field of vocational training;
- implementing regional retraining programs and creating an early retirement program for coal mine workers;
- implementation of measures aimed at reintegrating educational institutions after de-occupation;



- reforming the youth career guidance system based on modernised networks and educational institutions;
- creating an effective system for training qualified personnel focused on new types of economic activity, in particular through the establishment of financial literacy and business skills training at state employment centres;
- changing educational programs aimed at integrating with the European academic space, as well as facilitating academic mobility and exchange between Ukrainian and European educational institutions;
- establishing dual education;
- creating joint educational programs involving both higher education institutions and businesses;
- developing education, which may also include the creation of new educational institutions, research and innovation centres at the regional and local levels, such as youth centres for innovation, creative economy and robotics in communities;
- creating an innovative network of higher education institutions, businesses, research organisations, local and regional economic development institutions, youth centres for the creative economy and robotics;
- introducing a State Program for the Development of Vocational Education, considering the energy transition needs, opportunities for diversifying the economy of coal communities and tools for economic growth (innovation clusters, industrial parks, free economic zones, etc.).

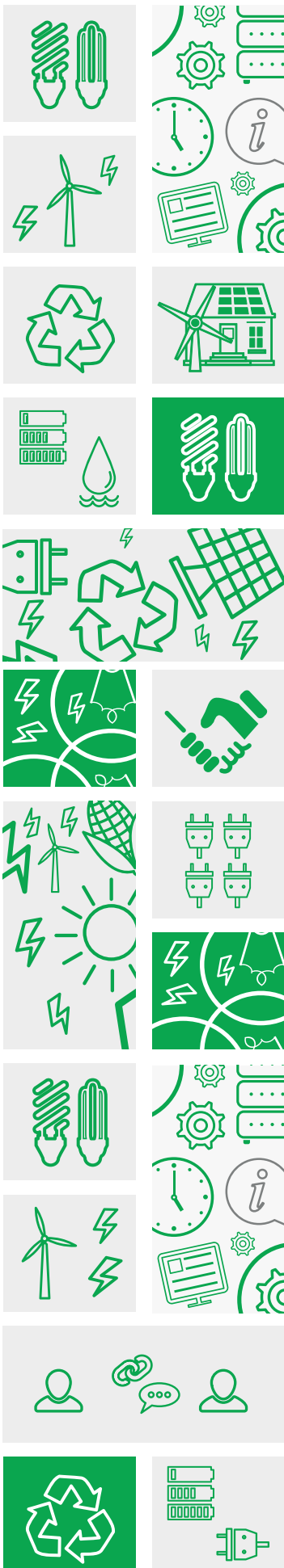
Mitigating social impacts is also an integral part of the just transition process. This includes the development of social and cultural infrastructure in the regions; promoting equality of treatment and opportunities; unemployment benefits and labour market integration; child support and childcare; adequate housing and pensions; access to basic services for all; social dialogue and engagement of workers in the transition process. For example, achieving gender equality remains a challenge. The situation varies from community to community, but as coal mining is a male-dominated profession, displacement and working conditions differ by gender. In addition, it is important to consider not only the coal towns only, but also the nearby



communities whose populations are directly or indirectly related to the coal industry when addressing social challenges.

Therefore, the **following measures should be taken:**

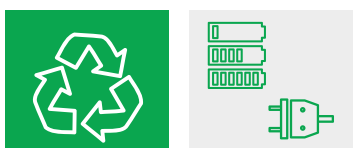
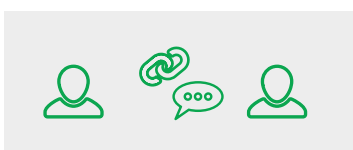
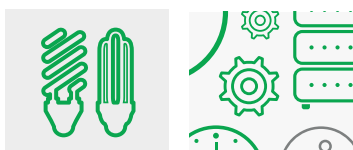
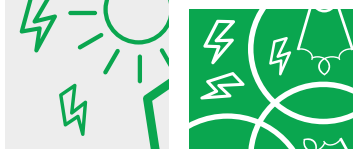
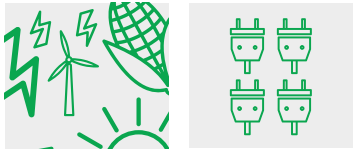
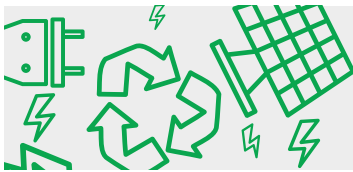
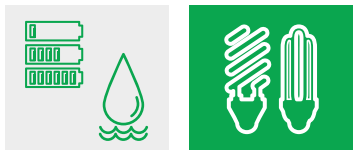
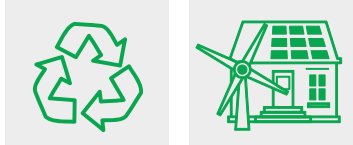
- study the situation of displaced persons from coal communities by region (internal and external migration);
- develop social housing programs, including long-term leaseholds;
- provide residents of coal communities and communities that have hosted IDPs from coal communities with adequate healthcare services, as this affects the decision of IDPs of all ages to live in a particular area;
- turn cities into places where people want to live by involving different groups of people in planning, restoration and development processes;
- study the motivation of IDPs to stay in the region of displacement and the necessary conditions to ensure their return;
- develop programs for the return of IDPs to their communities (also from abroad);
- implement programs targeting young people in coal communities, for example, to involve young people in decision-making processes and implement innovative projects;
- counteract the gender pay gap and horizontal gender segregation through a system of benefits targeted at women raising children on their own and women of retirement (elderly) age, programs and projects aimed at employing women;
- develop support and training/retraining/skills development programs for coal industry workers:
- provide support not only for coal workers but also for their families,
- develop psychological support programs for the transition process,



- create a support network and mentoring programs for workers transitioning from the coal industry. For example, mentoring, providing guidance, resources and encouragement as they change careers and seek new opportunities;
- overcome or mitigate the impact of gender stereotypes and the resulting division of labour that is common in coal communities through training and retraining programs;
- systematically collect statistical data that reflects differences and inequalities in the situation of women and men in all spheres of life, disaggregated by sex, age, etc. Data collection methods should take into account the presence of stereotypes, as well as social and cultural factors that may contribute to gender bias;
- encourage women to explore and master new forms of employment through targeted (international, regional, national) vocational training programs and scholarships;
- support women with children, including by providing accessible and affordable childcare services, to enable women to pursue education, training and employment, enabling them to participate more fully in the economic life of their communities;
- support women's entrepreneurship, including the development of training, mentoring and financial assistance programs targeted at women interested in starting their own businesses;
- infrastructure projects should improve the quality of life in coal towns, for example, by providing better roads, utilities, housing, and public spaces, considering the needs of different population groups, gender sensitivity, the needs of people with disabilities, etc., e.g. creating a more inclusive and equitable community environment.

The coal communities face many challenges, and some of the problems will have to wait for the Ukrainian victory to be solved. However, it is important to plan the transition process and involve communities in it now. We request to consider the above recommendations and integrate them into the further development of the State Target Program for the Just Transition of Coal Regions.

ORGANISATIONS THAT SUPPORTED THE POSITION:



Member organisations of the Ukrainian Climate Network:

NGO "Centre for Environmental Initiatives "Ecoaction"

NGO "Ecoclub"

KCPO "EcoPravo-Kharkiv"

NGO "Plato"

NGO "Khmelnyskyi Energy Cluster"

NGO "Ekoltava"

NGO "Centre for International Cooperation and Project Implementation"

And also:

Coalition of NGOs and Municipalities "Energy Transition"

Luhansk Regional Human Rights Centre "Alternativa"

NGO "Ukrainian Agency for Investment and Sustainable Development"

NGO "Dobropillia Youth Centre "DOBRO"

NGO "Territory of Sustainable Development"

Charitable Foundation "Community Development Fund "Parity"

NGO "Nova Druzhkivka"

NGO "Public Initiative "City of the Sun"

NGO "You. Mentor Centre for Innovation and Partnership"

NGO "Razom We Stand"

NGO "Ukrainian Evaluation Association"

NGO "Country of a free community"

NGO Pokrovska human rights organisation "Shchyt"

NGO "Centre for Anti-Crisis Research"

NGO "Foundation Regional Centre for Economic Research and Business Support" RcErBs

NGO "Bottom-up"

Charitable Foundation "Support UA"

NGO Chervonohrad Community Development Fund

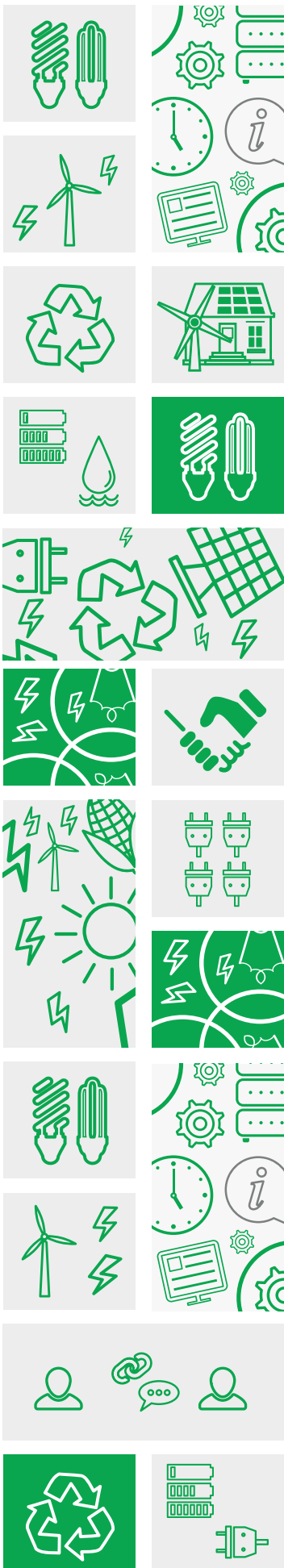
RePower Ukraine Charitable Foundation

NGO "Agency for Sustainable Development of Ternivka, Dnipro Oblast"

NGO "Pravopolis"

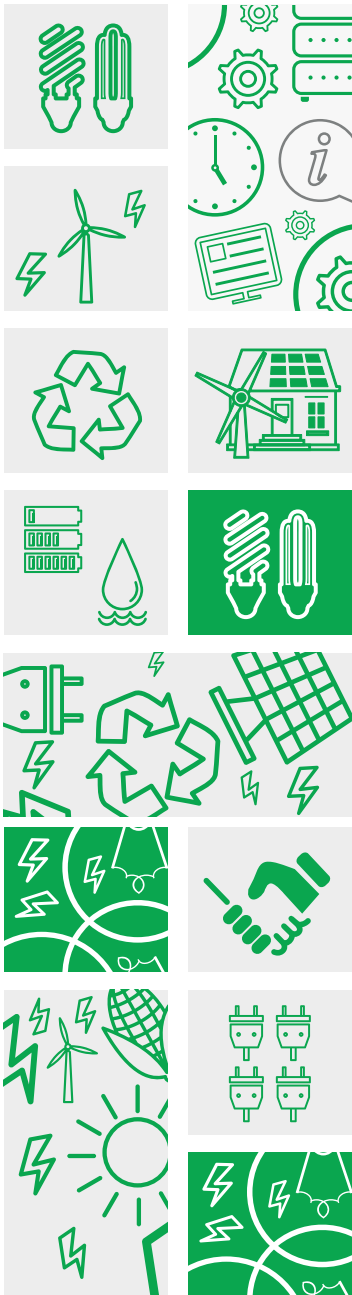
NGO "Centre for Innovative Development "Persona"

NGO "Next to You"



MATERIALS:

1. We call on the European Commission to continue its support for Ukraine's coal regions <https://en.ecoaction.org.ua/call-on-european-commission-support-ukraines-coal-regions.html>
2. Open letter from the leaders of coal mining communities on the restoration of Ukraine <https://interfax.com.ua/news/press-release/859008.html>
3. Concept on the Role of Just Transition in the Recovery of Ukrainian Coal Mining Communities https://ecoaction.org.ua/wp-content/uploads/2023/06/concept-just-transition-coal_ua.pdf
4. Civil society position on the just transition of coal mining communities in the post-war reconstruction of Ukraine <https://ecoaction.org.ua/pozytsii-spravedlyva-transformatsia.html>
5. Prospects for the Development of Small and Medium-Sized Enterprises in Coal Communities in Donetsk and Dnipro Regions <https://ecoaction.org.ua/perspektyvy-rozv-maloho-ta-s-pidpr-vuhilnykh-hromad.html>
6. Draft Strategy for the Transition of Coal Communities in Donetsk Oblast <https://myrnograd-rada.gov.ua/news/23492-povidomlennya-pro-oprilyudnennya-projektu-strategiyi-transformaciyi-vugilnix-gromad-doneckoyi-oblasti>
7. Life without choice: Manifestations of Inequality and Discrimination in Coal Towns that Should Be Considered in a Just Transition - Analysis (Summary and Recommendations) <https://ecoaction.org.ua/wp-content/uploads/2022/08/nerivnist-u-vuhilnyh-mistah-abs.pdf>
8. Study of the decarbonisation process in eastern Ukraine - Analytical report <https://r2p.org.ua/wp-content/uploads/2022/05/analitichnij-zvit-shhodo-doslidzhennya-proczesu-dekarbonizaczi%D1%97-u-shidnij-ukra%D1%97ni-povna-versiya.pdf>
9. Green rebuilding of Ukraine: Public Position <https://ecoaction.org.ua/zelena-vidbudova-ukrainy-pozytsia-hromadskosti.html>



10. Program of Economic Diversification of Dobropillia City Territorial Community in the Context of "Green Transition" <https://doc.mrd.gov.ua/component/documents/8890:pro-zatverdzhennia-prohramy-ekonomichnoi-dyversyfikatsii-miskoi-dobropilskoi-miskoi-obiednanoi-terytorialnoi-hromady-v-umovakh-zelenoho-perekhodu>
11. Programme of Economic Diversification of Petropavlivka Territorial Community https://petropotg.dp.gov.ua/storage/app/sites/145/uploaded-files/Draft_ASTAR_Programma_Petropavlivka1.pdf
12. Program of economic diversification of the Pershotravensk urban territorial community in the context of just transition for the period up to 2024 https://rada.info/upload/users_files/34357055/a2c830f0fe042f5bf7640fe25d112266.pdf
13. Program of economic diversification of the Mykolaivka territorial community of Synelnykivskyi rayon of Dnipropetrovska oblast in the context of just transition for 2022-2024 <https://mykolaivka.otg.dp.gov.ua/storage/app/uploads/public/618/d2b/a31/618d2ba319e90360778823.pdf>
14. Concept of the State Target Program for the Just Transition of Coal Regions until 2030 <https://zakon.rada.gov.ua/laws/show/1024-2021-%D0%BF#Text>



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