



European
Commission

Adapting the Just Transition Mechanism to the needs of regions in transition

**Key lessons and recommendations
for the future**

*Regional and
Urban Policy*

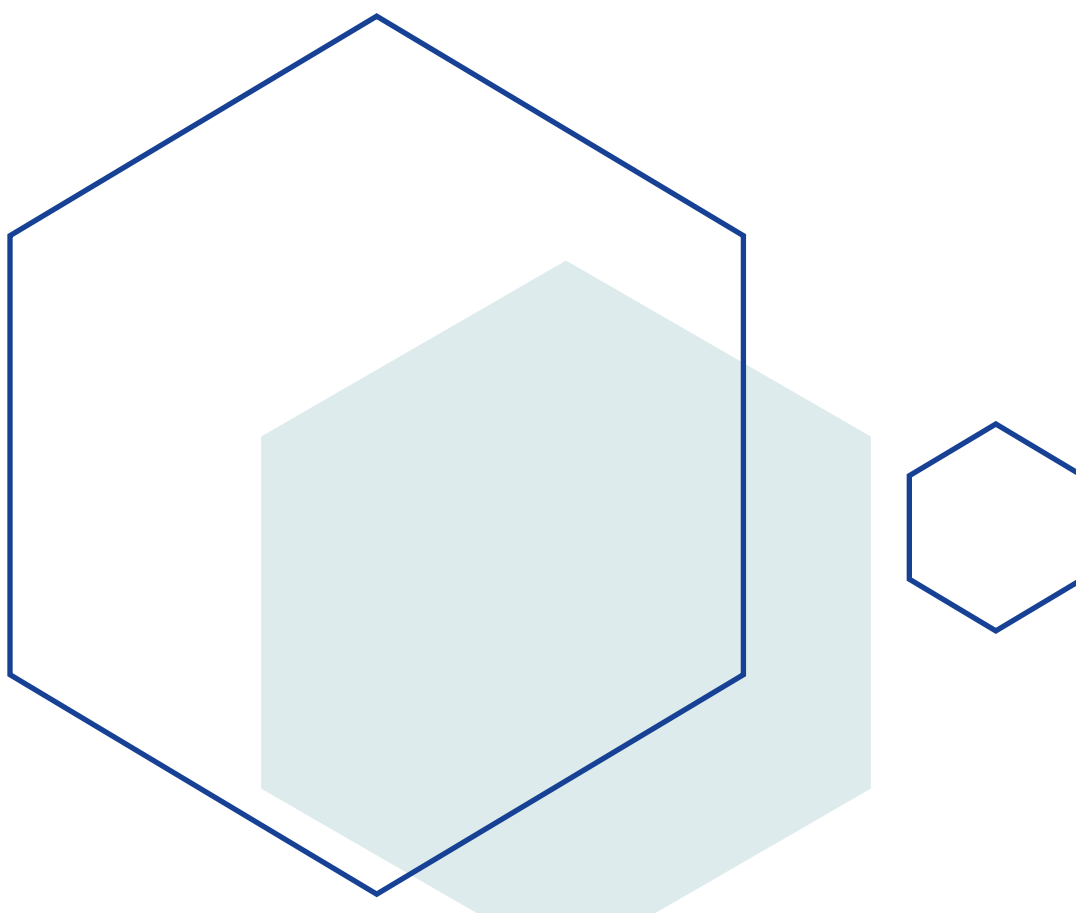
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Abbreviations

Acronyms	Full name
CCUS	Carbon Capture, Utilisation, and Storage
DG REGIO	European Commission Directorate General for Regional and Urban Policy
DNSH	Do No Significant Harm
EFTO	European Fair Transition Observatory
ERDF	European Regional Development Fund
ESF+	European Social Fund Plus
JTF	Just Transition Fund
JTM	Just Transition Mechanism
JTO	Just Transition Observatory
JTP	Just Transition Platform
MFF	Multiannual Financial Framework
NECP	National Energy and Climate Plans
PSLF	Public Sector Loan Facility
RRF	Recovery and Resilience Facility
SME	Small and Medium-sized Enterprises
START	Secretariat Technical Assistance to Regions in Transition
TJTP	Territorial Just Transition Plan
TSI	Technical Support Instrument
JASPERS	Joint Assistance to Support Projects in European Regions
ELENA	European Local Energy Assistance Facility
WG	Working Group



Executive summary

This discussion paper synthesises contributions from members of the Just Transition Platform's 'Future of Just Transition' Working Group and other key stakeholders on the potential design of future support for a just transition in Europe. It distils insights gathered through four Working Group meetings with 20 – 40 working group members, three separate surveys, and 23 position papers on the current and future design and implementation of the just transition in Europe that were shared with the European Commission Directorate General for Regional and Urban Policy (DG REGIO).

The report is structured into several chapters. First, it outlines the role of the Just Transition Mechanism (JTM) in the wider EU context. Chapter 1 highlights key success factors for implementing a just transition with the support of the JTM, backed by stakeholder insights and success stories. Chapter 2 explores the alignment of future just transition funding to the needs of regions in transition within the 2028-2034 Multiannual Financial Framework (MFF), based on lessons learned from the JTM and looking forward. Chapter 3 offers recommendations to refine the JTM's design and implementation, enhancing its effectiveness in facilitating a just transition across EU regions, and leverage future just transition funding.

The recommendations are provided in the context of the 2028-2034 MFF and are summarised as follows:



1. Continue EU funding to support long-term just transition efforts.



2. Keep funding place-based and tied to local transition plans.



3. Ensure inclusive stakeholder engagement remains a core priority.



4. Expand tailored capacity building and simplify administrative processes.



5. Prioritise vulnerable groups and sector-specific needs in funding.



6. Strengthen multi-level governance with empowered regional and local roles.



7. Review the funding delivery model for effective just transition support.



8. Enhance local monitoring with clear guidance and independent reviews.



9. Refine project eligibility to support SMEs, exclude fossil fuels, and foster green value chains.

Introduction and EU context

The 'Future of the Just Transition' Working Group (WG) was formed under the European Commission's Just Transition Platform (JTP) as a discussion forum for just transition experts to identify key success factors and areas to improve the Just Transition Mechanism (JTM), and to inform the future design of the 2028-2034 Multiannual Financial Framework (MFF).¹

The positions of the WG members expressed in this paper have been captured through four WG meetings and three separate surveys covering the following topics:

- Survey 1: General input to identify relevant topical areas of the WG (*31 respondents*)
- Survey 2: Key points of the JTM framework which worked well and which to improve (*15 respondents*)
- Survey 3: Scope, governance and alignment of the future JTM with wider EU goals (*26 respondents*)

In addition, the report includes insights from 23 position papers on the current and future design and implementation of the just transition in Europe submitted to the European Commission Directorate General for Regional and Urban Policy (DG REGIO) by a range of stakeholders. An overview of the organisations that provided position papers is presented in the [Annex](#).

JTM structure and EU context

The JTM is a key tool developed by the European Union to ensure a fair transition to a climate-neutral economy. It aims to mitigate the socio-economic impacts of the transition in regions heavily dependent on coal and carbon-intensive industries. The JTM provides targeted financial assistance focusing on reskilling and upskilling, social cohesion, employment generation, and economic diversification. Throughout the 2021-2027 MFF, around EUR 55 billion is expected to be mobilised across three pillars of JTM funding:

1. The [Just Transition Fund](#) (JTF)
EUR 19.7 billion funding is available, which is expected to leverage around EUR 7 billion of national co-financing, amounting to a total of EUR 27 billion. JTF funding is awarded based on the needs expressed in the Territorial Just Transition Plans (TJTPs) of EU Member States to identify the territories and sectors facing the biggest challenges in the transition towards climate neutrality.
2. The [InvestEU](#) Just Transition Scheme
The Scheme is expected to mobilise EUR 10-15 billion in mostly private sector investments. It provides a budgetary guarantee under the InvestEU programme and an InvestEU Advisory Hub acting as a central entry point for advisory support requests.
3. The [Public Sector Loan Facility](#) (PSLF)
The PSLF combines EUR 1.3 billion of grants from the EU budget with an additional EUR 6-8 billion of loans from the European Investment Bank to leverage EUR 13.3-15.3 billion of public investment.

[The Just Transition Platform \(JTP\)](#) supports JTM implementation in JTF territories. The Platform provides access to funding information, regulatory updates, sector or region-specific initiatives and toolkits ([JTP Knowledge Hub](#)), and promotes good practice exchange. Specific services include technical assistance ([JTP Groundwork](#)), formalised exchanges between JTF territories and just transition experts ([JTPeers](#)), expert discussion forums ([JTP Working Groups](#)), and regular opportunities for stakeholders to meet and exchange (JTP Conferences).

Supporting coal and carbon-intensive territories while bolstering low-carbon technologies and innovation is essential to ensure that nobody is left behind on the EU's path to achieving climate neutrality by 2050¹. With transition towards a climate-neutral economy gaining momentum, people, territories, industries, and economies in the EU are affected asymmetrically. The JTM works to address these inequities while also supporting the delivery of wider EU initiatives such as the Clean Industrial Deal² and EU Competitiveness Compass³, which both seek to turn European decarbonisation efforts into economic and industrial growth while creating quality job opportunities in Europe.

¹ There are two 'circles' of Working Group members: first circle WG members actively shape, steer and perform the work of the Group, and second circle WG members participate in some of the Group's meetings on an ad-hoc basis and are consulted on a regular basis. A list of Working Group members and key stakeholders can be found in the Annex.

In July 2025, the Commission is expected to share proposals for the 2028-2034 MFF period. Discussions and negotiations amongst Member States will take place over the following years, with the funding framework to be approved by mid-2027 at the latest.⁴ Future cohesion policy will reflect the emerging political priorities of the Union.⁵

Chapter 1: Success factors for implementing a just transition with support of the Just Transition Mechanism

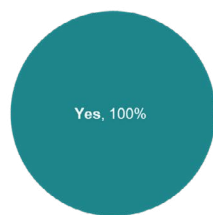
Several elements influence the effectiveness, fairness, and sustainability of the just transition. This chapter delves into the key success factors that facilitate the effective implementation of a just transition supported by the JTM, derived from stakeholder insights shared during the WG meetings and the first and second WG survey. This section also features success stories from JTF territories, providing concrete examples of how the Mechanism has positively impacted these territories.

1.1 Overall support for the Just Transition Mechanism

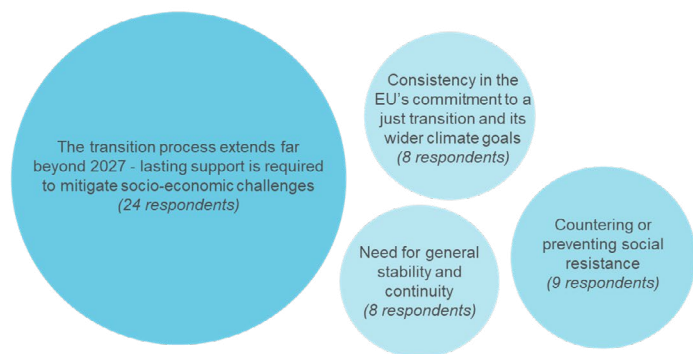
"We finally received support for a transition that has been going on for 30 years." – WG member

Throughout WG surveys and meetings, overwhelming support for the existence of the JTM was expressed. When asked if just transition implementation requires dedicated funding in the next MFF, 100% of WG members responded 'yes', with a vast majority (80%) reasoning that the transition process extends far beyond 2027 and therefore lasting support is required to effectively mitigate socio-economic challenges. The majority of WG members also reported that the JTM triggered or accelerated both the decarbonisation of carbon-intensive industries and the coal phase-out of their regions to a moderate, large or very large extent.

Does JT implementation require dedicated financing in the next MFF?



Reasons given for "Yes" responses



Legend: Results displayed in pie charts and bubble charts depict answers received from WG members via surveys prior to WG meetings. Answers with more responses are represented in darker colours, circle size corresponds to the number of respondents, and the results of open-ended questions have been categorized based on a specific colour scheme depicted below.



Figure 1: Result of survey for WG members, conducted in preparation of the 1st JTP 'Future of Just Transition' Working Group meeting on 5 March 2025, 31 survey respondents.

1.2 Clear aim and focus on vulnerable communities and territories

The JTM is the first support mechanism in the EU targeted towards supporting the regions, industries, and workers most affected by the energy transition, and as such is a unique complement to other elements of cohesion policy. WG members shared that in some cases, the JTM was the first time their territories received support to address the socio-economic impacts of the transition. The clear aim and focus of the JTM was highlighted by multiple WG members as a key successful element. Additionally, members emphasised the effectiveness of the Mechanism's support for a wide variety of projects that can be funded. This specific yet holistic design gives the JTM a different added value to other sources of EU funding according to WG members, as it allows regions to tailor project calls and funding lines to the specific socio-economic needs in their region, while still aligning with overarching EU goals.

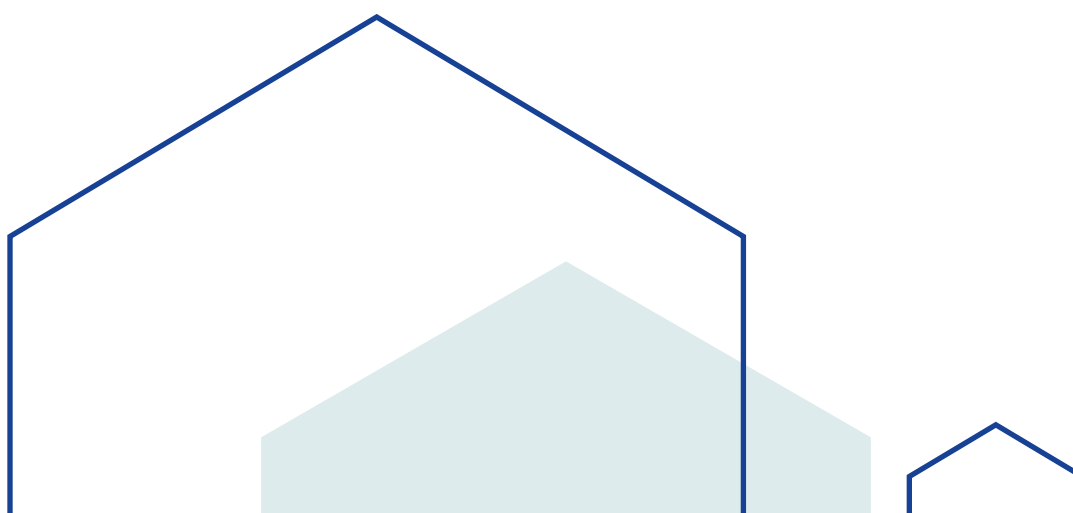
1.3 Territorial approach

One of the success factors most often highlighted by stakeholders is the territorial approach of the JTM, which allows support to be tailored to the specific needs of each JTF territory. Over 85% of WG survey respondents agreed that specific geographies should be targeted, with WG members emphasising that the territorial approach is essential. The importance of the territorial or place-based approach was also highlighted by the Federal Government and Länder of Germany in their extensive review of cohesion policy⁶, in the Fourth Annual Policy Dialogue of the EU Coal Regions in Transition Initiative⁷, by the European Committee of the Regions in its "A just transition for all EU regions" opinion⁸, and by Ministers in the General Affairs Council.⁹

The main reason for supporting a territorial approach was that the economic, social, and environmental challenges that arise due to the transition are highly localised (~60% of WG survey respondents). Other reasons given were the need to prevent uneven economic development of territories within Member States, the need to maximise local stakeholder involvement, and the benefits of successful transitions of coal regions to net-zero economies extending to the rest of the country and EU. The territorial approach was also highlighted by CEE Bankwatch Network in their position paper, describing how it encourages a greater involvement from regional and local authorities and enhances public participation and inclusion of vulnerable groups.¹⁰ Some WG members further emphasised the importance of the territorial approach in enabling the direct involvement of local stakeholders in JTM planning and implementation.

The allocation of funding at NUTS 3 level (or below) is seen as a successful element of the JTM by WG members as well as by the Marshal Office of the Silesian Voivodeship in their letter to the European Commission Executive Vice President for Clean, Just and Competitive Transition¹¹ and the Polish Green Network.¹² There was also agreement from multiple position papers that allocation of funding should extend beyond GDP, as explicitly mentioned by an S&D MEP¹³ and the Silesian Voivodeship, which suggested that funding be allocated based on the carbon intensity of the economy, the extent of environmental degradation and the level of unemployment in a region.¹⁴ A paper by the Green Tank proposed that funding allocation should reflect how fast a region needs to transition, with regions requiring a fast transition receiving more funds.¹⁵ This approach was supported by two Working Group members.

Structurally disadvantaged regions often face low administrative capacity, demographic decline, or long-term economic challenges. In some Member States, support at the sub-regional level such as the JTM has enabled these regions to access EU funding without having to compete with better-resourced regional or national centres, which typically dominate allocations from broader funds like the European Regional Development Fund (ERDF) or European Social Fund Plus (ESF+).



1.4 Territorial Just Transition Plans

The requirement for regions to develop TJTPs has also been singled out as a key success factor by stakeholders, however with some caveats. The TJTPs served as important ‘master plans’ for local just transition journeys, according to both WG members and other stakeholders such as CEE Bankwatch Network¹⁶ and the Federal Government and Länder of Germany.¹⁷

“The development of the TJTPs has allowed for long-term planning of the transitions within these regions, providing a roadmap for the direction in which the regions are heading.” – CEE Bankwatch Network¹⁸

The multi-stakeholder involvement required as part of TJTP development process encourages community involvement and promotes transparency and accountability throughout the transition process. According to WG members, this provides significant added value to local stakeholders and improves their buy-in to the developed vision. For example, trade unions can contribute by ensuring that social agreements are considered during transition processes, and can in turn become aligned with the overarching approach and purpose of the TJTP. Consultations on TJTP development also provide a platform for often marginalised voices – including but not limited to women, young people and people with disabilities – to contribute to the future of their regions. According to WG members, efforts to engage these groups in planning activities should be increased in future just transition funding. TJTP development also adds value to regional and national transition policy by connecting these two levels of policy planning and implementation. One WG member also mentioned maintaining flexibility in TJTPs as important to prevent limitations in future just transition implementation and to allow Member States to respond to changing circumstances.

Several WG members expressed the need for TJTPs to be better coordinated with National Energy and Climate Plans (NECPs), especially in terms of key phase out and decarbonisation commitments, while other WG members highlighted that this approach is not always effective. While some WG members believed that existing national plans could have replaced the TJTP of their region, there was consensus amongst WG members that more detailed alignment of TJTPs with national-level planning, and wider European cohesion policy, can be important for effective just transition implementation.

1.5 Active stakeholder engagement

When asked which elements of the JTM to maintain in the future, WG members articulated the importance of engaging stakeholders during JTM planning and implementation processes. WG members highlighted that the flexible approach to stakeholder engagement is one of the success factors of the JTM. The JTM enables regions to tailor their approach to engage stakeholders so that it addresses both the needs of the region and the existing structures within the Member State. Top-down, bottom-up and combined governance models have all been implemented to successfully maximise the benefits of local stakeholder perspectives.

The success of active stakeholder engagement is closely linked to TJTP development. CEE Bankwatch Network specifically noted the role of the territorial approach in encouraging involvement from regional and local authorities, as well as the inclusion of vulnerable groups through public participation.¹⁹ Additionally, through the EU Life JUSTEM project, the Institute for European Energy and Climate Policy has demonstrated how structured, iterative stakeholder engagement processes can enhance the quality of TJTP implementation and foster long-term ownership by local communities.²⁰ As such, the contribution of a wide range of stakeholders was identified by WG members as an element of the JTM to be maintained.

Additionally, WG members have appreciated that JTM stakeholder engagement has enabled direct contact between representatives of the European Commission and JTF territories. WG members also shared that active stakeholder engagement has led to the implementation of successful projects targeting groups who are often impacted by the transition – carbon-intensive workers, SMEs and underrepresented groups, including women and young people. A similar position is shared by the International Labour Organisation, which emphasises that governments and social partners should collaborate at national, industry, local, and enterprise levels to co-develop, implement, and monitor policies for the just transition.²¹ Continuous stakeholder engagement throughout the just transition process, such as via working groups withing JTF monitoring committees or through the direct inclusion of stakeholders in monitoring committees was also recommended.

Active stakeholder engagement in Ida Virumaa, Estonia



The Ida Virumaa region is the centre of shale oil production in Estonia, making the region and its 133,000 inhabitants vulnerable to the impacts of the transition to climate neutrality. Estonia set up a comprehensive partnership to ensure that everyone's needs and perspectives were reflected in the TJTP and its implementation. Particular attention was paid to public consultation activities, including a public opinion survey to feed into the development of the TJTP that yielded over 1,500 responses. The [Ida Viru Youth Climate Assembly](#), consisting of 40 young people from Ida Viru, also formulated recommendations for the TJTP and participants founded an NGO to monitor TJTP development and implementation.

1.6 Ability to support both 'hard' and 'soft' measures

WG members underlined that support for both 'hard' measures, such as infrastructure investments, and 'soft' measures, such as workforce reskilling programmes, is a key success factor of the JTM. This feature was also mentioned in position papers, such as that of the Marshal Office of the Silesian Voivodeship.²² The flexibility in project eligibility allows a range of beneficiary profiles to receive support from the JTM, which is not the case for other EU funds.

However, hard and soft measures often have different timelines, sometimes making it difficult to include both in a JTM project. WG members argued for the expansion of soft measures, such as investments in skills and education, to meet social needs under the next funding period. Expanding or at least continuing soft measures in the JTM would give regions continuity in their approach to addressing relevant social challenges in their region, allowing them to build on and leverage stakeholder engagement already established under the JTM.

Transformation Centre in Ústí nad Labem, Czech Republic



In the Czech Republic, almost half (EUR 740 million) of the JTF allocation will go towards 22 strategic projects, which often combine hard and soft measures. The [Transformation Centre](#) in Ústí nad Labem is one of the strategic projects. It will provide comprehensive services for the transformation of the region – ranging from an open data platform to inform decision making and support for SMEs and start-ups to advanced energy management services and services to revitalise the area. The Centre will also include space for workshops and a restaurant or café, increasing community engagement. The Transformation Centre will be housed in a remodelled elementary school building.

“Job after Coal” in Wielkopolska, Poland



The phase-out of lignite energy production in Poland's Wielkopolska region has a profound impact on employment. With a contribution of almost EUR 42 million from the JTF, the [Job after Coal](#) project supports the re- and upskilling of 2,200 people and assists them in finding new employment. While the project is primarily targeted at former mine and power plant workers, it is also open to workers in sectors dependent on mining and energy production and household members of affected workers. Job after Coal is a bottom-up initiative of trade unions.

1.7 Capacity building support

The non-financial support provided from the JTM through the Just Transition Platform to public administrations, NGOs and other beneficiaries in JTF territories has also been emphasised as a key success factor by WG members. Many regions and beneficiaries are small and limited in both resources and expertise for just transition planning and implementation. Capacity building support, in the form of technical assistance, best practice exchanges between regions, knowledge sharing via toolkits and guidelines, expert discussion forums, and conferences has given all regions access to valuable support and learnings otherwise unavailable. Capacity building can also be provided by the just transition region itself, as highlighted in the below success story from Slovenia, or as in Silesia, where the Regional Observatory for the Transition Process offers workshops for local stakeholders in the subregions, including information about developing project proposals.

Specifically, the technical assistance under [JTP Groundwork](#) was identified throughout WG meetings as an important element, with members sharing that the assistance was effective and highly appreciated. The position paper of the Polish Green Network also identified JTP Groundwork as a key success factor²³, and WG members highlighted the importance and usefulness of the multiple capacity building mechanisms offered by the JTP. Capacity building support offered by other European actors, including Secretariat Technical Assistance to Regions in Transition ([START](#)), Technical Support Instrument ([TSI](#)), Joint Assistance to Support Projects in European Regions ([JASPERS](#)) and European Local Energy Assistance ([ELENA](#)), was also highlighted. WG members also expressed support for making technical assistance available to beneficiaries in the local language where possible to maximise local stakeholder inclusion. Targeted expertise and technical support are also seen as important tools for regions in addressing administrative burdens associated with JTM applications and implementation.

Capacity building support in Savinjsko-Šaleška and Zasavje, Slovenia



The two JTF territories of Slovenia, Savinjsko-Šaleška and Zasavje, are adapting to a future without coal. In both regions, the JTF finances Just Transition Centres which provide dedicated support and capacity building for the implementation of the just transition. The Just Transition Centres operate within the Regional Development Agencies of the respective JTF territories and offer a range of support. The [Just Transition Centre of Savinjsko-Šaleška](#), for example, assists SMEs, municipalities and local stakeholders in project development and stakeholder engagement. The centre also provides a range of specialised trainings for stakeholders who are thinking about applying for JTF funding.

Which additional mechanisms can ensure decarbonisation commitments of JTF regions?

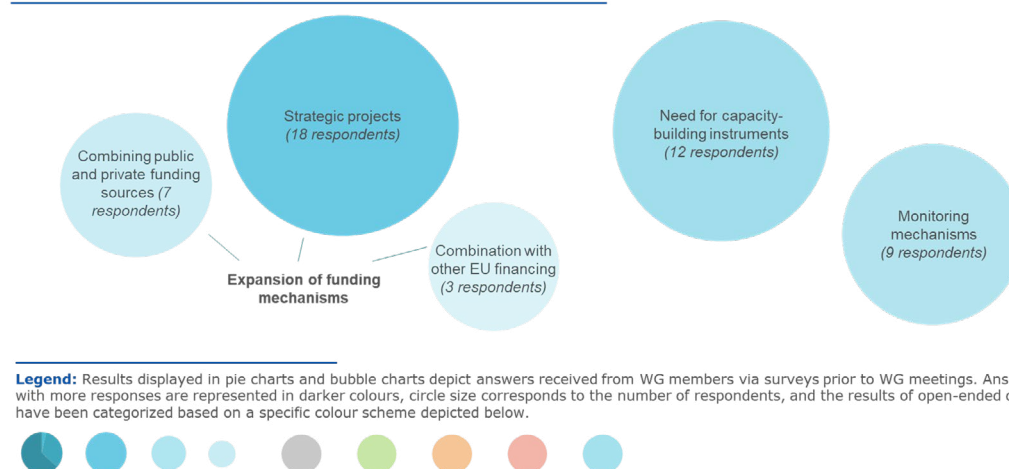


Figure 2: Result of survey for WG members, conducted in preparation of the 1st JTP 'Future of Just Transition' Working Group meeting on 5 March 2025, 31 survey respondents

Chapter 2: Increasing alignment of the JTM to the evolving needs of regions in transition in challenging times

Transition looks different in every EU Member State and JTF territory, resulting in different transition needs and foci across the EU. This chapter focuses on overarching elements that are relevant to every JTF territory and combines lessons learned from the JTM with suggestions on how to better target the needs of transforming regions in the 2028–2034 MFF.

2.1 Ensuring funding stays targeted

While the holistic approach of the JTM has been praised by WG members, they also identified design gaps which can exclude vulnerable groups and social and economic activities in need of support.

Integrating vulnerable groups is a challenge across EU funds, and stakeholders have noticed a lack of **social support** for vulnerable groups in some JTF territories. While the targeting of such groups is possible as part of TJTPs, many Member States have not prioritised this in practice. Without targeted focus, vulnerable groups are often left out of JTM planning and implementation and may be further marginalised as a result. While examples of comprehensive social support projects exist under the current JTM, as described in the success story from Poland, social support has been described as too limited in some cases. One WG member shared the example of labour programmes being available to only the immediate workforce impacted by the transition in their region, neglecting to support the wider social groups affected, such as the families of workers losing their jobs or communities impacted in broader ways by the gradual collapse of the carbon-intensive industry. This gap was also raised in relation to the success of the JTM in supporting both hard and soft measures, as described in [Section 1.6](#).

WG members called for the design of future just transition funding to specifically target vulnerable and underrepresented groups. The need for greater social support has been repeatedly expressed by WG members, with one member sharing that, based on their on-the-ground experience, actual social needs are broader than those identified in TJTPs.

WG members and position papers also called for more targeted **economic development support** that distinguishes between different sectoral and geographical transition needs. WG members have highlighted a key difference between the needs of carbon-intensive sectors which need support to decarbonise, such as steel, and other sectors which need to be phased out, such as coal. WG members see a need to extend the scope of the JTM to cover additional regions to cover and sectors, noting that a broader scope would need to go hand in hand with an increased budget to cover all needs.

2.2 Refining the delivery model of just transition funding

WG members called for improving the coordination and implementation of the InvestEU Just Transition Scheme and the PSLF. WG members appreciate that the InvestEU Just Transition Scheme enables the combination of different EU funds, and that both funding instruments allow for combining private and public funding. However, WG members flagged that the application process for both InvestEU and PSLF is very complicated, making it challenging for potential beneficiaries to leverage their limited financial and institutional capacities to use the funding instruments. WG members value the dedicated financing for SMEs and start-ups under InvestEU and blended financing under PSLF. However, they believe these instruments would benefit from an expansion of eligible project types – enabling smaller projects and municipalities as well as project intermediaries to access JTM funding from all three pillars. Position papers have also addressed the need for funding instruments to be more tailored to support smaller municipalities. Making funding for smaller municipalities more flexible should go hand in hand with prioritising clear communication and coordination on the available funding and application processes.

Some stakeholders, such as the German Federal Government, support the integration of the JTM funding lines into other funding instruments such as the ERDF or ESF+ to minimise the number of EU funds, with the caveat that just transition related activities can be kept as a separate funding line for the territories that need it.²⁴ On the other hand, several WG members expressed the importance of maintaining a distinct fund for just transition, highlighting its unique objectives that complement existing cohesion policy – a targeted territorial approach based on NUTS3 level and better adaptation to the needs and characteristics of territories most affected by the transition that cannot be replaced by sector-oriented cohesion policy funds. This position was shared by the Polish coal regions in their joint statement on the JTF.²⁵

Several stakeholders pointed to the model of the RRF as a delivery system that can potentially improve JTF implementation. While the European Court of Auditors noted that more can be done to ensure that the Recovery and Resilience Facility (RRF) effectively focuses on performance²⁶, and some argue that it is too early in RRF implementation to draw conclusions, proponents believe the RRF model reduces complexity and can lead to a lower administrative burden, especially in the context of switching from financing linked to costs to financing linked to milestones and targets. Conversely, critics – such as IndustriAll and the European Economic and Social Committee – argue against aligning a future JTM with the RRF's model, citing inadequate stakeholder involvement, lack of shared management, and the absence of multi-stakeholder governance.^{27,28}

2.3 Improving governance

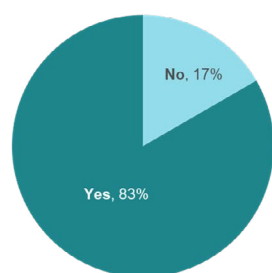
Stakeholders agree that the choice of governance structure is a pivotal factor of JTM success in Member States. Ineffective governance models have inhibited the impact of the JTM in some JTF territories, resulting in lagging implementation timelines, delays in fund disbursement, and coordination challenges between regional and national authorities. Both the slow disbursement of funds and the short timelines of NextGenerationEU were highlighted regularly in WG meetings as well as by the Germany Federal Government and Länder as areas of the JTM to improve.²⁹ Only half of the respondents to the third WG survey felt that the current governance model in their region was suitable for successful JTM implementation. Overly centralised governance and insufficient cooperation between national and regional levels were mentioned as reasons for this shortcoming.

WG members called for increased support at the regional level to ensure sufficient capacity is available to implement a Member State's chosen governance structure. For future funding periods, WG members stressed the importance of allowing Member States to retain control over their governance structure and called for flexibility in governance and upholding the Partnership Principle throughout JTM implementation. WG members favoured decentralised governance models throughout each WG member meeting, while noting that the success of such models relies heavily on local institutional capacity and experience. WG members called for extra funding for administrative staff to facilitate these goals and improve JTM governance. Position papers also suggested establishing national just transition contact point or just transition commissions, especially in Member States where existing governance structures are not sufficient.

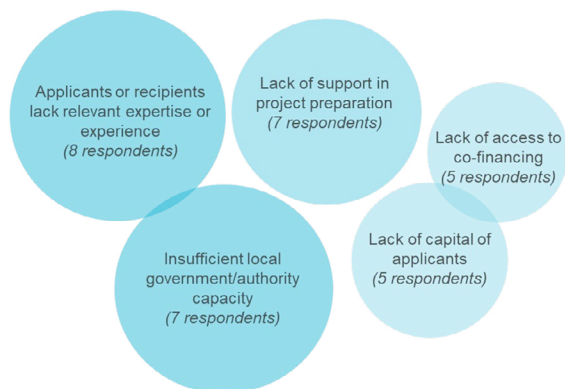
2.4 Strengthening capacity building and reducing administrative burden

By nature, the JTM supports the regions with limited capacity to mitigate the negative impacts of the transition. In some JTF territories, these challenges are being addressed for the first time thanks to the Mechanism. According to WG members, demanding administrative processes and essential resource gaps hamper the ability of JTF territories to benefit from the JTM – challenges which particularly impact smaller regions. WG survey respondents listed a lack of local resources, capacity and expertise as the most common resource gaps for JTM implementation. More specifically, WG members cited insufficient local capacity, a lack of relevant experience and expertise of recipients, and a lack of support in project preparation in some regions.

Have you identified any resource gaps?



Reasons given for "Yes" responses



Legend: Results displayed in pie charts and bubble charts depict answers received from WG members via surveys prior to WG meetings. Answers with more responses are represented in darker colours, circle size corresponds to the number of respondents, and the results of open-ended questions have been categorized based on a specific colour scheme depicted below.



Figure 3: Result of survey for WG members, conducted in preparation of the 1st JTP 'Future of Just Transition' Working Group meeting on 5 March 2025, 31 respondents.

Such barriers were also highlighted by a WG member, who observed that smaller municipalities were struggling to implement JTM projects due to capacity limitations across the eight Member States they had worked in. Another WG member attributed the relative success of their country's JTF implementation to project application support offered to potential funding recipients. WG members also highlighted the need for administrative capacity at the central level, especially when Member States set up a new managing authority or implementing body to implement the JTF. Heavy administrative burden exacerbates the barriers created by these resource gaps, as noted by WG members and stakeholders such as the German Federal Government.³⁰

WG members agreed that future administrative procedures for funding applicants and recipients should be as simple as possible to ensure that regions with limited administrative capacity are not excluded from support. Specifically, they mentioned speeding up funding allocation and project approvals as well as enabling smaller municipalities and companies with limited capacity as points for improvement. WG members also regularly raised the need to simplify state aid conditions, which has created barriers to implement large, complex projects. It is important, however, that simplifications do not come at the cost of the flexibility and specificity of the JTM, both of which have been identified as key success factors of the JTM by WG members.

Access to capacity building support is imperative for regions to effectively tackle long-term transition challenges. WG members called for increased technical assistance, and two position papers explicitly stated the need to continue technical assistance programmes – with CEE Bankwatch Network highlighting that the transformation of regions requires long-term capacities and solutions.³¹ Other papers identified specific stakeholders in need of dedicated support. The European Committee of Regions called for tailored training programmes for local authorities to enhance their administrative capacities, and the European Trade Union Confederation suggested capacity building for trade unions on climate topics as an essential step towards a just transition.^{32,33}

2.5 Enhancing monitoring and transparency

Improving monitoring and transparency – a topic of importance across EU funds – can make a future just transition funding more impactful. Monitoring for the JTF is stipulated in the Common Provisions Regulation (Articles 38-45), which lays down that fund evaluations should be conducted throughout the programming period to measure impact and enhance awareness of the achievements of Union funding. The JTF Regulation provides JTF territories with a set of indicators to monitor the implementation of their TJTPs and, consequently, JTF implementation.

While indicators set the tone for how the implementation of the JTF will be monitored and evaluated, the JTF Regulation also encourages JTF territories to establish governance mechanisms, some of which are known as Just Transition Observatories (JTO), to develop, oversee and implement monitoring and evaluation processes. Some JTF territories are using JTOs as an opportunity to develop a broader monitoring system for just transition in their regions. Examples of such JTOs can be found in Poland (the Regional Observatory of the Transition Process in Silesia), Portugal (the Observatory for the Just Transition in Alentejo Litoral), and Greece (the territory-level JTO in Western Macedonia). In some cases, a JTO also takes on activities beyond monitoring, such as in Silesia, where the observatory also provides management support.

However, gaps in the current JTM monitoring framework hinders the ability of Member States to evaluate the Mechanism's socio-economic and environmental impact. For example, a WG member suggested that a future framework should incorporate more qualitative metrics, and another WG member suggested new performance indicators to capture job creation, youth employment and quality of life, which are currently overlooked. CEE Bankwatch Network also highlighted this gap in their position paper, stating that transparency, accountability, and public access to information on how JTF funding has been used and which projects have been implemented are vital in designing successful future just transition policy.³⁴ One WG member also explained that without tracking of the impact of projects, potential failures could be missed – such as the creation of less desirable jobs for miners or reskilling programmes unsuited to the demands of the local job market. Underperformance of measures – if not monitored and detected and thus unaddressed – could inhibit regions' decarbonisation and coal phase-out progress.

WG members suggested that future just transition funding should establish a Europe-wide observatory and focus on implementing a more tailored monitoring framework. While the upcoming European Fair Transition Observatory (EFTO) aims to support monitoring and transparency by collecting and providing wider data on just transition processes – including data related to demography, employment and education – WG members highlighted the importance of region-specific guidance on how to tailor and localise monitoring frameworks to support TJTP implementation at a regional level. The European Economic and Social Committee recommends granular mapping activities to ensure awareness of the current and future challenges and opportunities of the transition at EU, national and regional level.³⁵

WG members articulated that more specified and clearer monitoring frameworks will make progress more tangible and potentially encourage the planning of future projects around such measurements. Around 60% of WG members were in favour of monitoring the decarbonisation commitments of JTF regions to fully understand JTM impact. Others expressed hesitation about directly linking JTM support to decarbonisation outcomes, stating that monitoring efforts should be focused on the Mechanism's central aim – mitigating the adverse impacts of the transition. If decarbonisation commitments are to be monitored, they underline that care must be taken to design a monitoring mechanism that reflects the complexity of collecting the correct data.

2.6 Extending the scope of projects financed

While the JTM can already fund a wide variety of types of projects, its scope of eligibility does not always enable just transition implementors to comprehensively addressing the evolving needs of regions. While there is consensus amongst WG members on the need for project eligibility reforms (80% of survey respondents) and support for extending the scope of the Mechanism (70% of 1st and 2nd WG members), the extension of types of projects suggested for future just transition funding varied significantly. Insights can be grouped into five main areas: improving the support for SMEs and for large companies, exploring social and environmental conditionalities, ensuring flexibility in the supported types of activities, and reviewing the approach to fossil fuel-related project eligibility.

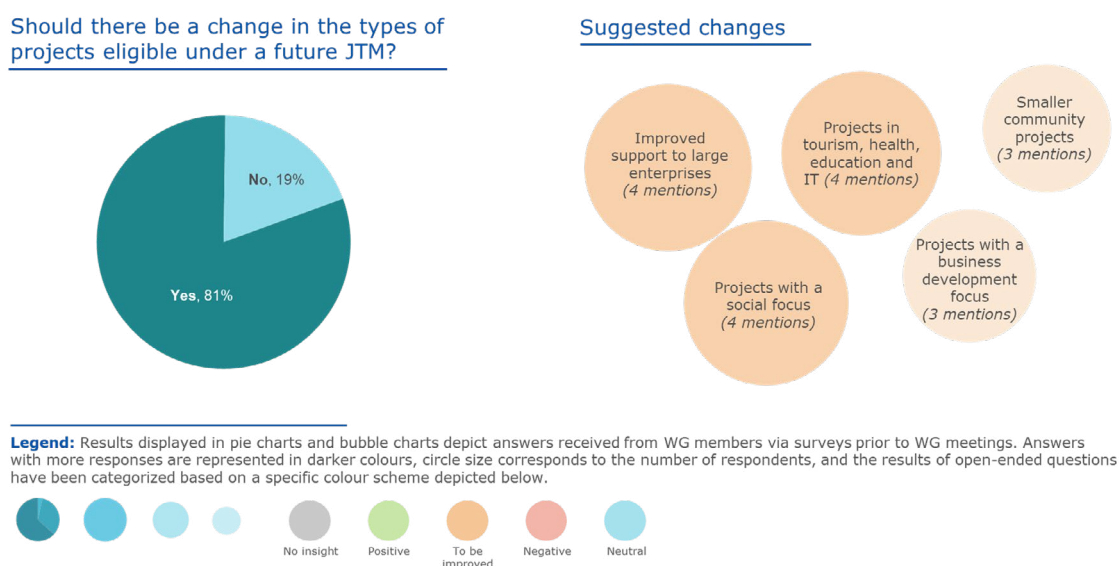


Figure 4: Result of survey for WG members, conducted in preparation of the 3rd JTP 'Future of Just Transition' Working Group meeting on 9 April 2025, 26 respondents.

Improving support for SMEs: New businesses hold important potential for economic diversification in JTF territories, which so far often relied on a single carbon-intensive industry. WG members repeatedly emphasised dedicated support for SMEs, viewing them as a pivotal actor in regional competitiveness and resilience. While the JTF already supports SMEs, WG members shared that smaller firms, including start-ups, experience difficulties in securing co-financing or bridge funding due to a lack of budget. One WG member highlighted that the JTM currently focuses more on individual projects and is missing a concrete strategy to build value chains for emerging industries, thus limiting the impact SME expansion can have on regions.

Improving support for large companies: Increased support for large companies has also been raised during multiple WG meetings as a topic of discussion. Several WG members underlined the potential of large companies in providing sufficient jobs to meet local needs in JTF territories and supported their inclusion in the JTM providing they decarbonise. One WG member also raised that future just transition funding should address how supporting the transition of cross-border companies can be navigated. Another WG member emphasised the difference between large companies in declining industries – which will not create jobs – and transforming industries, which can contribute to the development of green value chains. On the other hand, many WG members expressed reservations about the actual impact of such companies on their local communities, both in terms of providing jobs and developing local and green supply chains. The ability of large companies to access other EU funding sources – such as the Modernisation Fund or Innovation Fund – was also highlighted, with WG members underscoring the need to prioritise SMEs under the JTM. It was also suggested that the JTM could tailor its support by distinguishing between large companies already in scope of other EU funds and those directly contributing to the aims of the JTM, such as workforce reskilling.

Exploring social and environmental funding conditionalities: The cohesion policy framework requires Member States to respect the ‘do no significant harm’ (DNSH) principle, as outlined in Article 9(4) of the Common Provisions Regulation, and the ‘polluter pays’ principle, described in Article 8(2) of the JTF Regulation. Potentially linking JTM funding to enhanced social and environmental conditionalities was discussed in depth throughout WG meetings and has also been addressed in six position papers. Several WG members highlighted the lack of social and environmental conditionalities as an area of the JTM to be improved, suggesting including conditionalities linked to vulnerable groups and the DNSH principle. Further discussion by the Working Group, however, led to the consensus that social and environmental conditionalities beyond the ‘polluter pays’ principle would increase the administrative burden and inhibit project eligibility and JTM implementation.

Ensuring flexibility in the supported types of activities: Article 8(2) of the JTF Regulation specifies that the JTF will exclusively support activities that are directly linked to its objective and that aid in executing the TJTPs. These include productive investments in SMEs for economic diversification and modernisation and investments in the creation of new firms, research and innovation activities, and the deployment of clean energy technologies. Investments in renewable energy, sustainable local mobility and enhancement of the circular economy are also supported, amongst others.³⁶ In a WG survey, respondents called for increased flexibility in the supported types of activities as an area of the JTF to improve. WG members shared that important projects may be missing out on funding due to rigidity in current eligibility requirements. They called for an updated approach to ensure flexibility is maintained in project selection. WG members underlined the importance of maintaining such a holistic approach and cautioned against reducing project selection to specific sectors. With parallel demands for simplification of the JTM, it is imperative that flexible project selection is not compromised. One potential approach could be to include more eligible types of projects, such as those in healthcare and tourism – two sectors highlighted by WG members as important to develop.

Reviewing the approach to fossil fuel-related project eligibility: The WG expressed a range of viewpoints on the topic of fossil fuel eligibility, and future just transition support must aim to capture such nuances. Many WG members support the complete exclusion of projects at any stage of the fossil fuel supply chain due to the potential for further fossil fuel lock-in for JTF territories, the slowing down of decarbonisation efforts, as well as the direct contradiction with other EU policies. They note that fossil fuel-related projects – such as Carbon Capture, Utilisation and Storage (CCUS) or blue hydrogen projects – are disproportionately expensive and are already covered by other EU funds, such as the Innovation and Modernisation Funds. They further note that funding fossil fuel-related projects might delay the transition towards alternative economic activities, thus contradicting the aims of the JTM. Alternative viewpoints were also observed in the WG, including the suggestion that such projects could create many jobs in JTF territories. WG members in favour of fossil fuel-related projects suggested that these projects could be considered on a strict case-by-case basis and potentially subject to specific conditionalities – such as limited project duration, restriction to particular industries, or regions starting from a lower baseline.

Chapter 3: Recommendations

The inputs provided by WG members and collected from stakeholder position papers form a clear picture of the way forward for the just transition in the European Union. Recommendations have been derived from these insights to support continuing the successful elements in the current JTM and to improve areas where funding and regulatory frameworks should be better aligned to the changing needs of regions in transition. The relevant government level addressed by these recommendations is included in *italics*.



Continue the JTM: *(Recommendation addressed to EU level)*

The continuation of dedicated support for the just transition in the form of financial and non-financial aid is crucial for ensuring a fair and equitable transition to a low-carbon economy. The insights captured in this report underline that the JTM must be continued in the next MFF as it provides unique value to vulnerable regions experiencing the negative effects of the transition. Without continuation, the benefits of previous JTM support will be lost due to the long-term nature of the transition, and the EU's dedication to not leaving anyone or any region behind will come into question. The timely adoption of the JTF Regulation is of particular importance to WG members, with over 90% of them emphasising this point. Delays in adoption can significantly hinder the JTF territories in implementing their just transitions.



Maintain the territorial approach: *(Recommendation addressed to EU and national levels)*

As one of the key elements supported by WG members and position papers, the territorial approach of the JTM must be maintained in future funding periods. This includes maintaining the requirement for Member States to develop TJTPs and ensuring the allocation of funding at NUTS 3 level or below. This place-based approach is a key driver of success, enabling the EU and Member States to deliver highly targeted support to the most vulnerable regions and communities. It also ensures a holistic approach to local transitions as opposed to sector-specific interventions.



Continue active stakeholder engagement: *(Recommendation addressed to EU, national, regional and local levels)*

The successful engagement of a variety of local and regional stakeholders during JTM planning and implementation must be maintained as a priority in future just transition funding. The direct involvement (both deliberative and representative) of key stakeholders – such as workers, trade unions, SMEs, universities, NGOs, civil society organisations, youth associations, social partners, and local residents – at all stages is essential to achieving an effective and inclusive regional transition that truly leaves no one behind. This comprehensive and pro-active approach must be facilitated with sufficient funding from the Commission to address the already limited capacity of national and local authorities. It is important too, however, that Member States retain flexibility in their approach to stakeholder engagement –providing it is comprehensive and in line with cohesion policy requirements for stakeholder engagement. This allows processes to be tailored to suit the existing structures within a country and the needs of a specific JTF territory. Member States should place the emphasis on engaging local and potentially marginalised voices – such as women, young people, and people with disabilities. TJTP development must continue to build on stakeholders on the ground and actively engage them in the just transition planning, implementation, monitoring and evaluation. Ongoing close cooperation with European Commission representatives is vital in maintaining the personal, hands-on approach WG members have consistently valued. Lastly, stakeholder engagement should be reinforced as a structured feedback mechanism throughout the implementation phase, supporting continuous learning, adaptive planning, and the alignment of evolving regional and local needs with policy responses.



Strengthen capacity building support and decrease the administrative burden:

(Recommendation addressed to EU, national and regional levels)

Future just transition support must address the demanding administrative procedures and resource gaps identified in this report. Capacity building support, including high-quality technical assistance and trainings for local and regional authorities, must therefore be continued and increased where needed. Such support must be tailored to meet the needs of local authorities, which can best be achieved by involving them in the design of support programmes. At the same time, administrative procedures must be simplified where possible. At EU level, simplified and clear regulatory requirements are needed. At national and/or regional level, implementing simplified and streamlined funding management and control processes can translate into clear governance and faster project selection and implementation. State aid rules must also be simplified and adapted to JTF territories to encourage just transition implementation in alignment with ongoing EU processes. However, these simplifications must not inhibit the flexibility and the specificity of the JTM.



Ensure funding stays targeted: *(Recommendation addressed to EU and national levels)*

An overall increase in support for social needs is recommended, particularly through greater investment in educational institutions and skills development. To avoid any future gaps in social support, the EU should require every Member State to prioritise vulnerable groups and to articulate targeted measures supporting those most at risk in the respective JTF territory. Effective governance structures focusing on pro-active local stakeholder participation will also contribute to social inclusion. Additionally, future economic support should be more targeted to reflect different sectoral and geographical transition needs. This should include a more refined approach towards the needs of different sectors when considering project eligibility. Just transition support should distinguish between sectors that must transition away from fossil fuels but are expected to continue – such as the steel or automotive industries – and sectors to be phased out completely, such as coal mining. This differentiation would help to ensure that support is targeted strategically towards projects that contribute to long-term regional resilience.



Develop governance models: *(Recommendation addressed to EU, national and regional levels)*

The European Commission should continue to allow Member states to shape their own governance structures, while providing additional support to strengthen institutional capacity at the regional level. This could include providing extra funding for administrative staff. National authorities are encouraged to formally integrate regional and local authorities into just transition governance models and ensure that decision-making powers are delegated to the authority with the relevant knowledge and capacity. Cooperation and better coordination throughout governance levels and local stakeholder engagement should also be prioritised. Where needed, specific support for national, regional and local authorities should be provided to facilitate decisions on the governance structure. Alongside continued active stakeholder engagement, direct regional and local engagement must be incorporated into just transition governance models.



Improve funding delivery models: *(Recommendation addressed to EU, regional and national levels)*

The Commission should enhance coordination between the various complementary JTM funding instruments by removing administrative and capacity-related barriers. This would allow a broader group of public and private stakeholders in JTF territories to better leverage the InvestEU and PSLF instruments. The European Commission should also consider the best approach to deliver just transition funding. Some WG members were in favour of keeping the JTF as a separate fund, while others see value in mainstreaming just transition funding in other instruments. Leveraging a performance-based delivery system modelled after the RRF was also discussed, with WG members noting that it should not come at the cost of transparency and multi-stakeholder governance in JTM implementation.



Increase monitoring and transparency: *(Recommendation addressed to EU, national and regional levels)*

While the upcoming monitoring instrument EFTO can be leveraged by Member States as a source of tangible information on the fairness aspects of their just transition, the Commission should also provide clear guidance for JTF territories on how to develop localised monitoring frameworks to support TJTP implementation. Monitoring and transparency could also be further strengthened by the introduction of an independent assessment of JTF impacts in future funding periods.



Align the scope of eligible projects:

Project selection ultimately determines the ability of the JTM to achieve its intended impact. It is therefore essential that gaps in the scope of project eligibility are addressed in future just transition funding, with the goal of diversifying the economy and retaining the green industrial potential in JTF territories. Recommendations for these aspects have been segmented based on key areas identified during WG meetings and in position papers:

- **Improving support to SMEs:** *(Recommendation addressed to EU, national and regional levels)* Member States should include a concrete approach to building value chains around emerging industries and diversifying the economy in their just transition planning. This should include a holistic approach to addressing the challenges faced by SMEs. Additionally, access to funding for smaller firms must be improved – such as by providing bridge funding for start-ups and smaller firms, lowering co-financing barriers, and increasing ex-ante funding and pre-financing rates.
- **Revising support to large companies:** *(Recommendation addressed to national and regional levels)* Large companies should remain reflected in just transition planning only when they can transition away from fossil fuels, provide attractive and lasting jobs, and bring new value chains and green industries to their regions. Many WG members agreed that large companies should (i) not be prioritised over SMEs; (ii) projects developed by large companies supported by the JTM should be revised to prevent overlap with other EU funds; and (iii) that it is key to ensure support remains targeted towards the most impactful projects.
- **Ensuring flexibility in the supported types of activities:** *(Recommendation to EU, national, and regional levels)* The Commission should require Member States and regional authorities to develop clear project criteria in their JTF calls, requiring them to articulate how they will support the development of comprehensive economic ecosystems in their regions. This approach will foster more holistic and goal-based project selection. As a part of this, it is vital to preserve the JTM's flexibility in supporting both hard and soft measures. The Commission can also explore extending the supported types of activities, with several WG members recommending making healthcare and tourism projects eligible.
- **Reviewing fossil fuel-related project eligibility:** *(Recommendation to EU and national levels)* Many WG members agreed that fossil fuel-related projects should remain ineligible for JTM funding. Some WG members raised that they could potentially be considered on a strict case-by-case basis. Fossil-fuel related projects already eligible for support under the Innovation and Modernisation Funds – such as CCUS and blue hydrogen infrastructure – should not divert resources from the JTM and its primary goal of mitigating the socio-economic impacts of the energy transition.

Annex

List of first and second circle Working Group members

The Working Groups' members come from national, regional and local authorities, associations representing regional, local, urban and other public authorities, organisations representing economic and social partners, and bodies representing civil society, such as non-governmental organisations. More information on the Working Groups can be found [here](#).

First circle

The core members, the so-called first circle WG members, actively shape, steer and perform the work of the group and support actions in the implementation phase.

Name	Country	Affiliation
Alexandru-Mihai Kelemen	Romania	Integrated Territorial Development Association of Jiu Valley
Adam Drobniak	Poland	University of Economics in Katowice, Faculty of Spatial Economy and Regions in Transition
Corinna Zierold	EU	IndustriAll European Trade Union
Csaba Vaszko	Hungary	University of Pécs
Eglė Jankauskienė	Lithuania	JSC Akmenės Cementas
Grzegorz Trefon	Poland	Trade Unions Alliance KADRA
Ján Stano	Slovakia	Ministry of Investments, Regional Development and Informatisation
Janja Burkelc	Slovenia	Development Agency of the Savinjsko-Šaleška Region
Karen Somers	Ireland	Department of the Environment, Climate and Communications
Lidia Greco	Italy	University of Bari Aldo Moro
Mags Bird	EU	WWF
Małgorzata Misiak	Poland	Marshal Office of the Łódzkie Voivodeship
Miłostawa Stępień (Chair)	EU	CEE Bankwatch Network
Nikolaos Mantzaris	Greece	The Green Tank
Patrik Pizinger	Czech Republic	City of Chodov
Radana Leistner Kratochvílová (Chair)	Czech Republic	Ministry of the Environment
Rumyana Grozeva	Bulgaria	Stara Zagora Regional Economic Development Agency
Tjeerd van Loosbroek	The Netherlands	Province of North Brabant
Vedran Kršek	Croatia	Ministry of Regional Development and EU Funds
Walter Meloni	Italy	MIRA Network
Ylva Sardén	Sweden	Region Norrbotten
Hubert Strauss (Observer)	EU	European Investment Bank
Jeroen Vandeur (Observer)	EU	European Committee of the Regions
Stavros Spyridakos (Stakeholder Engagement WG)	EU	Institute for European Energy and Climate Policy
Marcin Baron (Stakeholder Engagement WG)	Poland	University of Economics in Katowice

Second circle

A second circle of close observers participates in some of the group's work on an ad-hoc basis and are consulted on a regular basis.

Name	Country	Affiliation
Anna Dudek	Poland	Marshal Office of the Silesian Voivodeship
Anna Kerékgyártó	EU	European Chemical Regions Network
Aurelija Kazlauskienė	Lithuania	Ministry of Economy and Innovation
Dimitrios Kouras	Greece	Entrepreneurship Support Foundation
Eleftherios Ioannidis	Greece	Ecological Movement of Kozani
Eva Korfova	Czech Republic	Region of Sokolov
Frank Mennega	The Netherlands	Province of Groningen
Ioannis Kostarellas	Greece	Just Transition Institute Greece
Jan Bondaruk	Poland	Central Mining Institute
Justyna Lasak	Poland	Marshal Office of the Lower Silesian Voivodeship
Katarzyna Kuczyńska-Budka	Poland	Silesian Union of Municipalities and Districts
Katarzyna Smętek	Poland	Forum Energii
Loriana Farkas	Romania	Association Social Institute of Jiu Valley
Lucie Hromková	Czech Republic	Ministry of Regional Development
Marta Schulte-Fischedick	EU	Energy Community Secretariat
Martin Šikovc	Slovenia	Zasavje Regional Development Agency
Mateusz Kowalik	Poland	Polish Green Network
Tomáš Burdych	Czech Republic	Ministry of Regional Development
Zdenek Hušek	Czech Republic	Innovation Center of the Ústí region

WG Facilitators of the JTP Secretariat

Emma Krause - JTP Secretariat, "Future of the Just Transition" Working Group Co-lead

Clara Casert - JTP Secretariat, "Future of the Just Transition" Working Group Co-lead

Moritz Schäfer - JTP Secretariat, Project Manager

Larissa Oppermann - JTP Secretariat

Aileas Macdonald - JTP Secretariat

Valerie Ziegler - JTP Secretariat

Elodie Salle - JTP Secretariat

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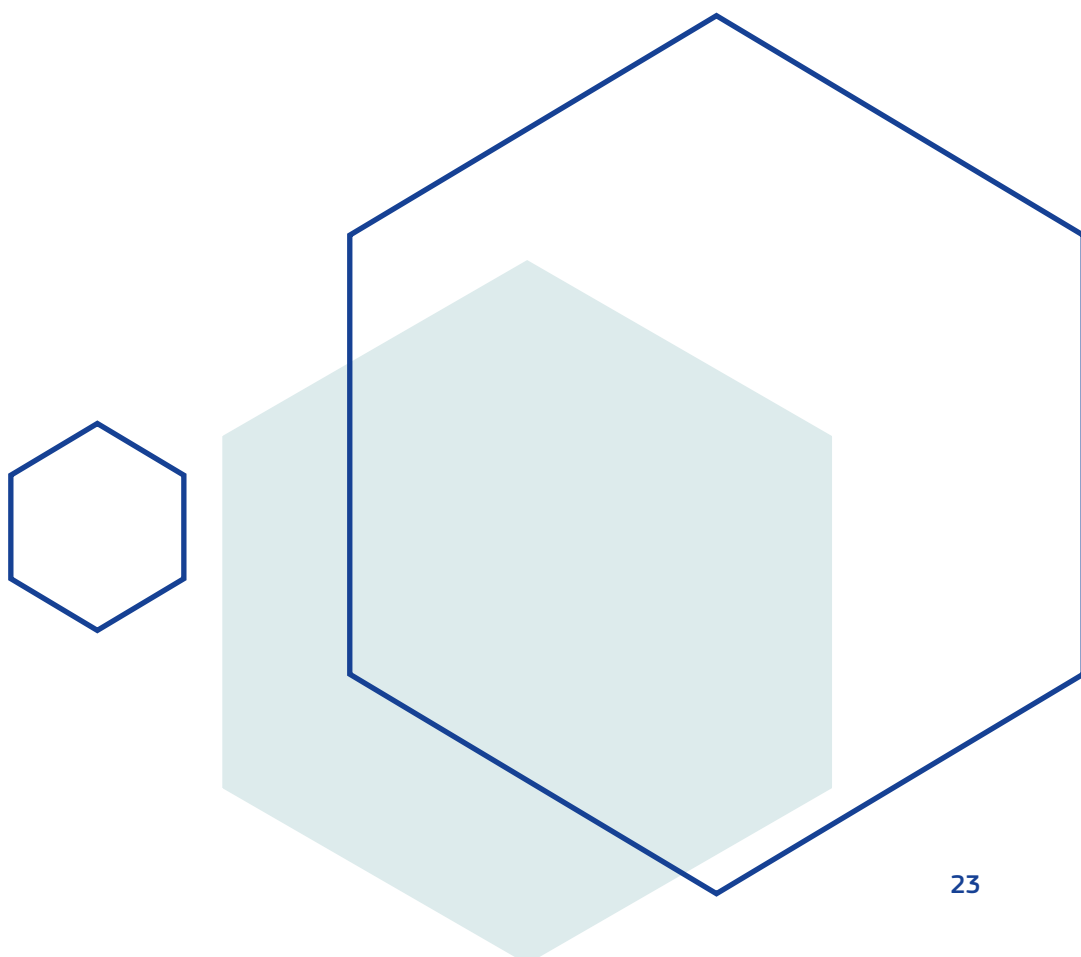
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- Polish Green Network (2025). [Voices from the regions covered by the Just Transition Fund](#).
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