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JUST TRANSITION AS A PART OF INTEGRATED ENERGY AND CLIMATE PLANNING

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Policy Guidelines by the Energy Community Secretariat on just transition as a part of integrated energy and climate planning

1. OBJECTIVES OF THE POLICY GUIDELINES

The purpose of this document is to provide guidelines for a unified and coherent approach to just transition planning in the Energy Community Contracting Parties[1], in alignment with the EU acquis. The growing commitment to develop dedicated Just Transition Plans or Roadmaps, as evidenced by ongoing efforts within several Contracting Parties' National Energy and Climate Plans (NECPs), reflects a shared objective to ensure that the energy transformation is not only sustainable, but also socially just. Just Transition Plans or Roadmaps should be fully reflected in and aligned with the NECPs and serve to complement the Policies and Measures (PaMs) outlined therein.

To support this, these Policy Guidelines aim to address identified gaps in incorporation of just transition elements into the NECPs and to support a more consistent and comprehensive planning framework across the Contracting Parties. They complement the Energy Community Secretariat's recommendations[2] on incorporating just transition aspects into the NECPs of the Contracting Parties by providing guidance on how to incorporate these elements into the final or updated NECPs, as well as into the dedicated Just Transition Plans envisaged by some Contracting Parties. A well-structured, clear document on just transition aspects can serve as a compass for just transition actions, as well as constitute a financing roadmap for domestic and international financing.

These Policy Guidelines are intended to support Contracting Parties by providing structured guidance in the following key areas:

- **enhancing integration of just transition into the NECPs** and integrated progress reports, as well as **outlining key elements for** supplementary documents such as **Just Transition Plans or Roadmaps**;
- incorporating Just Transition Plans or Roadmaps into integrated energy and climate planning by addressing the mandatory **impact assessment of PaMs in NECPs**;
- supporting local and governmental authorities in the preparation of **Just Transition Plans or Roadmaps in line with EU structures**; and ensuring their eventual incorporation into NECPs;
- **improving reporting on just transition**, as part of both the Just Transition Plans and overall energy and climate governance processes.

2. CONTEXT

For the purpose of this paper, just transition in the Energy Community refers to a people-centred and regionally tailored approach to phasing out fossil fuels while providing targeted support to those most affected by the transition. It encompasses not only the replacement of outdated, carbon-intensive infrastructure with sustainable alternatives but also the social, economic and labour-related dimensions of that transformation. This includes proactive planning to support affected workers and communities, address energy poverty, promote inclusive governance, and ensure fair access to the benefits of the transition. Just transition has been a cross-cutting element on the Energy Community's agenda, and there is a growing need to continue and strengthen this engagement to support more effective planning, integration into NECPs, and socially balanced implementation of the energy transition across the Contracting Parties.

The energy transition for the Energy Community is at a crossroads. On the one hand, Energy Community Contracting Parties have committed to decarbonising their economies and reaching the 2050 climate neutrality objective. On the other hand, in most Contracting Parties, lignite and coal-based electricity generation still dominates[3], characterised by low generation efficiency and high levels of CO_2 and other pollutants' emissions. The age of coal plants in the Western Balkans ranges between 34 and 67 years, with an average age of 46 years in 2023, rendering the current electricity infrastructure increasingly obsolete[4] and entailing risks to supply security. The need for a just and sustained transition is further highlighted by the health toll of the current emissions. In 2019, it was estimated that pollution from PM2.5 alone was responsible for 28,400 premature deaths in the Western Balkans[5].

The distance between objectives and continued reality is easily explained: implementing the energy transition in the Energy Community is a challenging task, as its costs need to be factored in alongside efforts to mitigate energy poverty which already is at a high level in the region[6]. In

[1] Ukraine, Moldova, Georgia, Montenegro, Kosovo*, Serbia, Bosnia and Hercegovina, Noth Macedonia, Albania
[2] https://www.energy-community.org/implementation/package/NECP.html
[3] In 2020 solids-fired power plants generated between 50% and 65% of gross electricity in the Western Balkans (Eurostat, Energy Balances).
[4] Based on EEA data collection, Reporting on Combustion Plants, https://rod.eionet.europa.eu/obligations/794/deliveries
[5] This figure does not account for additional premature deaths caused by other pollutants such as NO2 and O3. Belis, C., Djatkov, D., Lettieri, T., et al. Status of Environment and Climate in the Western Balkans, EUR 31077 EN, Publications Office of the European Union, Luxembourg, 2022, ISBN 978-92-76-52723-7, doi:10.2760/294516, JRC129172
[6] S. Bouzarovski, H. Thomson, and M. Cornelis, "Confronting Energy Poverty in Europe: A Research and Policy Agenda," Energies, vol. 14, no. 4, Art. no. 4, Jan. 2021, doi: 10.3390/en14040858

the Western Balkans alone, there are around 45,000 people employed in coal mining and coal fired power plants[7]. In 2023, in Ukraine, 21,000 people worked at private and state-owned enterprises in the coal sector[8]. For these reasons, a just energy transition should be a shared priority of national energy, climate and social policy considerations and, thus, a prominent part of the integrated energy and climate planning and reporting in the Energy Community.

By signing the Sofia Declaration on the Green Agenda for the Western Balkans as part of the "Berlin Process" in November 2020, Albania, Bosnia and Herzegovina, Kosovo*[9], Montenegro, North Macedonia, and Serbia pledged to follow the European Union in its decarbonisation path towards a climate neutral economy by 2050, as enshrined in the European Green Deal. Consequently, the Ministerial Council adopted in November 2021 the adapted EU's Clean Energy for All Europeans package[10] and the Decarbonisation Roadmap[11] to support a path towards net zero greenhouse gas emissions by 2050. Among its main goals, the Decarbonisation Roadmap underscores the importance of establishing a shared political message on subjects such as a coal phase-out and fossil-fuel subsidies. In December 2022, the Ministerial Council adopted the 2030 Energy Community energy and climate targets for the reduction of energy consumption, increase of the share of renewable energy sources and reduction of greenhouse gas emissions[12]. Moreover, the same Council[13] recalled "the importance of the energy and climate transition to be just and socially acceptable with regards to the implementation of the Decarbonisation Roadmap"[14].

Through the Ministerial Council Decisions 2021/14/MC-EnC and 2022/02/MC-EnC, the 2021 Ministerial Council adapted and adopted Regulation (EU) 2018/1999 of 11 December 2018 on the Governance of the Energy Union and Climate Action (the adapted Governance Regulation[15]), laying the foundation for energy and climate governance in the Energy Community. The adapted Governance Regulation requires Contracting Parties to develop integrated NECPs. The NECPs include national objectives, targets and respective PaMs for all five dimensions of the Energy Union, which are closely related and mutually reinforcing, namely: (i) decarbonisation (including renewable energy); (ii) energy efficiency; (iii) energy security; (iv) internal energy market; and (v) research, innovation and competitiveness. As mandated by Article 8 of the adapted Governance Regulation, NECPs must explicitly address just transition considerations: in addition to evaluating the cost-effectiveness of planned policies and measures, they must ensure a fair distribution of such costs and benefits. This makes just transition an integral part of economy-wide development planning until 2030.

To implement Article 17 of the adapted Governance Regulation, the Implementing Regulation (EU) 2022/2299[16] was adapted and adopted for the Energy Community, supplementing the adapted Governance Regulation. The implementing Regulation lays down rules for the application of Regulation (EU) 2018/1999 of the European Parliament and of the Council regarding the structure, format, technical details and process for the integrated national energy and climate progress reports. Thus, it provides a set of templates based on which Contracting Parties will report progress towards the achievement of objectives defined under the NECPs. The Implementing Regulation includes tables for reporting information on a just transition (described further in Section 3.2).

Alongside its legal framework, the Energy Community has launched several initiatives aimed at integrating just transition principles into all aspects of energy policy, thus giving more attention to the needs of workers, women and local communities This commitment is reflected in the annual Just Transition Forum, as well as in four key initiatives:

- the Centre for Alleviating Energy Poverty;
- the Gender Equality Initiative;
- the Clean Air Regions Initiative (CARI) and earlier also;
- Coal Regions in Transition in Western Balkans and Ukraine[17] (CRiT WBUA).

*The creation of the annual **Just Transition Forum** was partly a response to the urgent need to establish an open and multi-stakeholder platform to discuss just transition topics. The Forum's mission is to gather a wide range of stakeholders, including government officials, representatives of civil society, including youth and trade unions, non-governmental organisations, international financing institutions and academia, to discuss the best ways to contribute towards a sustainable, low-carbon region. The Just Transition Forum takes place annually in one of the countries of the Energy Community, with the most recent one held in 2024 in Pristina, Kosovo*. The previous Just Transition Forum in Skopje gathered around 200 participants to discuss policy planning for a just transition, socio-economic challenges in coal-dependent communities, financial support mechanisms, and the positive effects on air quality and social equality. The yearly Forum provides networking opportunities and facilitates meaningful discussions and knowledge exchange on just transition topics among stakeholders from various sectors.*

The transition in the Energy Community is inevitable and is being driven in particular by the current inefficient and unreliable state of electricity generation fleet in the region. The magnitude of the unfolding economic and societal transformation requires thorough and careful planning,

[7] Data for 2018. Source: https://bankwatch.org/wp-content/uploads/2022/01/2022-01-11_A-Just-Transition-Fund-for-the-Western-Balkan-countries.pdf
[8] Draft Cabinet of Ministers Decree On approval of the State Target Program for the Fair Transformation of Coal Regions of Ukraine by 2030, p.4. https://docs.google.com/document/d/1V8s2GkW2DB5deuQJuNtKJjOMXm6Nob_h/edit?usp=sharing&ouid=101693933740387820741&rtpof=true&sd=true
[9] Throughout this document, this designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo declaration of independence
[10] EU's Clean energy for all Europeans package as adapted and adopted for the Energy Community by the 2021 Ministerial Council: https://www.energy-community.org/dam/jcr:b11e75e1-3e4b-4166-a3ab-0d3ecaa526fd/20211130_Fact%20Sheet.pdf
[11] General Policy Guidelines 01/2021/MC-EnC Decarbonisation Roadmap for the Contracting Parties of the Energy Community.
[12] Decision 2022/02/MC-En of the Ministerial Council of the Energy Community.
[13] Meeting of the Ministerial Council in December 2022, representing the governments of the Parties to the Energy Community Treaty. The Council is the highest decision-making body of the Energy Community. It convenes at least once a year.
[14] Decision 2022/02/MC-En of the Ministerial Council of the Energy Community.
[15] Regulation (EU) 2018/1999 of 11 December 2018 on the Governance of the Energy Union and Climate Action incorporated and adapted by the Ministerial Council Decision 2021/14/MC-EnC of 30 November 2021 on incorporating Regulation (EU) 2018/1999 in the Energy Community acquis communautaire and amending Annex I of the Treaty and amended by the Ministerial Council Decision 2022/02/MC-EnC of 15 December 2022.
[16] Implementing Regulation (EU) 2022/2299 of 15 November 2022 laying down rules for the application of Regulation (EU) 2018/1999 of the European Parliament and of the Council as regards the structure, format, technical details and process for the integrated national energy and climate progress reports. Official Journal of the European Union. To be adapted and adopted for the Energy Community in 2024.
[17] The Energy Community has been an active participant in the Coal Regions in Transition in Western Balkans and Ukraine, which has ended on 31 December 2023.

considering both the costs and benefits of various options, with actions beginning today. For instance, re-profiling coal regions by introducing new economic activities and adjusting the local population's skills to meet these new requirements will take significant time, especially if decision-makers aim to avoid a shock. For this reason, just transition planning is not merely an optional decision, but a fundamental requirement to manage any economic transition while ensuring energy security. A predictable and long-term energy transition path will also strengthen social acceptance of the changes, giving adequate time to citizens for adaptation. In addition, the strong intertwined nature of energy poverty and coal phase-out will require further attention, as the existing system of cross-subsidization keeps the population dependent on the current coal and lignite-based assets. A well-designed and planned transition will also help to attract investors and donors. Detailed just transition measures anchored in a clear timeframe with estimated financing needs provides the predictability necessary for financial resources.

3. JUST TRANSITION AS PART OF INTERGRATED ENERGY AND CLIMATE PLANNING

3.1. Just Transition as part of National Energy and Climate Plans

As highlighted above, just transition is an integral part of the NECP design. While it is strongly anchored in the decarbonisation dimension, it should also be present in all other dimensions. In accordance with the adapted Governance Regulation, just transition considerations should, to the extent feasible, constitute a part of the assessment of the impacts of PaMs of all the five dimensions mentioned above. In particular, Article 8 of the adapted Governance Regulation addresses aspects of a just transition by requiring Contracting Parties to provide in their NECP an assessment of the *"macroeconomic and, to the extent feasible, the health, environmental, employment and education, skills and social impacts, including just transition aspects (in terms of costs and benefits as well as cost-effectiveness) of the planned policies and measures"*.

Moreover, a just transition is closely linked with the concept of energy poverty, which must be assessed in the NECPs as there is a specific section dedicated to its description and its prevalence and relevance for the Member State[18]. According to the adapted Governance Regulation, information on progress towards the national indicative objective to reduce the number of households in energy poverty is required. This includes data on the number of households experiencing energy poverty in the society based on selected indicators and, where available, information on PaMs addressing the issue. Reporting on energy poverty is closely linked to planning, implementing, and monitoring a just transition, since rising energy prices—and the resulting risk of increased energy poverty—are key concerns that a just transition should address.

The Energy Community Secretariat conducted a mandated assessment of NECPs and found that just transition aspects were not sufficiently integrated into the NECPs at the level of objectives and PaMs. Thus, they did not constitute an integral part of the NECP design and Energy Community Secretariat recommendations were published to improve this insufficiency[19]. A detailed overview of just transition in NECPs is provided in Annex IV of these Policy Guidelines.

3.2. Integrated reporting on Just Transition

In addition to the adapted Governance Regulation, its Implementing Regulation 2022/2299 embeds a structured framework for reporting on just transition aspects in the NECPs. Implementing Regulation 2022/2299 specifies the framework of reporting on the NECPs, thus, the outline of the Integrated Progress Reports.

Starting from 15 March 2025, Contracting Parties are required to report biennially on the impacts of PaMs outlined in the NECPs, through the submission of the Integrated Progress Reports. Article 15 of Implementing Regulation 2022/2299 specifies the reporting requirements on energy poverty and just transition, along with a reporting template outlined in Annex II of these Policy Guidelines. Specifically, the Regulation lists the required information on how the implementation of the NECPs contributes to just transition, including the promotion of human rights, gender equality, and addressing inequalities in energy poverty. The reporting obligation encompasses the following impacts of PaMs contained in NECPs:

- Expected impacts on **jobs, labour markets and skills;**
- Expected **distributional impacts** amongst population;
- Expected impact for **most affected regions;**
- Expected impact on **quality of life, well-being;**
- Expected impacts on **costs;**
- **Inclusiveness and participatory** processes.

In addition, the information to be reported on the impacts of NECP implementation on the promotion of human rights and gender equality and addressing inequalities in energy poverty, encompasses the following:

- Promotion of **human rights**[20];

[18] Article 24 in the adapted Governance Regulation.
[19] All Energy Community Recommendations on NECPs can be accessed under https://www.energy-community.org/implementation/package/NECP.html and downloaded for Albania, Bosnia and Herzegovina, Georgia, Kosovo*, Moldova, North Macedonia, Serbia and Ukraine.
[20] Contracting Parties may describe how the implementation of their integrated national energy and climate plans contributes to their obligation to prevent the foreseeable adverse effects of climate change and ensure that those affected by it, particularly those in vulnerable situations, have access to effective remedies and means of adaptation to enjoy lives of human dignity.

- Promotion of **gender equality**[21];
- Addressing **inequalities in energy poverty**.

A more detailed description of the above reporting elements, along with optional information to be provided, is provided in Annex I of these Policy Guidelines.

4. ADDRESSING JUST TRANSITION IN THE EU

Member States of the European Union are mandated by the Governance Regulation[22], as well as by the Implementing Regulation 2022/2299[23], to assess just transition aspects of their PaMs and adequately report on them.

To support its decarbonisation commitments and encourage coal phase-out, the European Union introduced the Just Transition Mechanism (JTM). It consists of three pillars focusing on injecting liquidity into territories identified by Member States as being particularly affected by coal phase-out or as carbon-intensive regions that will face significant impacts from the climate transition. The JTM has three pillars – (i) the Just Transition Fund (JTF), (ii) the Just Transition scheme under InvestEU and (iii) a Public Sector Loan Facility. To access funding from the JTM, EU Member States have to identify eligible territories and develop the Territorial Just Transition Plans (TJTPs). These plans must set out clear decarbonisation commitments and present a comprehensive approach to managing the transition at the local level, addressing its economic, social, and energy dimensions in a fair and inclusive way. The regions are now implementing the TJTPs, which enable the regions to receive financial resources from the JTM and the JTF. The JTF is governed by Regulation (EU) 2021/1056[24] which sets the rules for the TJTPs and financing of the eligible activities. Contracting Parties are not eligible to access the EU JTF.

As part of Regulation (EU) 2021/1056, Article 11 outlines a mandatory list of content of the TJTP in order to access Just Transition Fund funding. Regions in Member States seeking to access the JTF must prepare these plans in accordance with the guidance in Regulation (EU) 2021/1056. Ideally, TJTP should align with national decarbonisation commitments reported in both, the draft and final NECPs. Table 1 below presents an overview of JT Plans in selected EU Member States.

Table 1. Examples of Just Transition Plans in the EU

Member State	National plan	Regional plan
Poland	No national plan	5 Just Transition Territorial Plans (Eastern Wielkopolska, Upper Silesia, Łódzkie, Wałbrzych in Lower Silesia, and Western Małopolska)
Romania	No national plan	6 Territorial Just Transition Plans (Hunedoara, Gorj, Dolj, Galați, Prahova and Mureș)
Slovakia	Joint Territorial Just Transition Plan covering three regions (Upper Nitra, Kosický and Banskobystrický)	
Czech Republic	No national plan	3 Territoria Just Transition Plans (Ústecký, Moravskoslezský and Karlovarský)
Hungary	No national plan	3 Territorial Just Transition Plans (Baranya, Heves and Borsod-Abaúj-Zemplén (BAZ)
Latvia	Joint Territorial Just Transition Plan which covers four regions (Latgale, Vidzeme, Zemgale and Kurzeme)	

The example of EU Member States shows that, in addition to integrating coal phase-out commitments into their NECPs, the TJTPs may serve as a supplementary tool, both by strengthening these commitments through a concrete implementation roadmap, and by providing targeted support to communities directly affected by the transition. A set of well-described actions increases the chances for funding. The experience with TJTP in the EU offers valuable lessons and can serve as a useful reference for Contracting Parties, should they choose to develop similar plans tailored to their national and regional contexts.

5. JUST TRANSITION PLANS

Due to the insufficient level of integration of just transition in NECPs and the decision by many Contracting Parties to create separate PaMs in the form of Just Transition Plans, the Energy Community Secretariat recommends that Contracting Parties develop Just Transition Plans replicating the TJTP structure and content, and base them on lessons learnt from EU Member States. Aligning with the EU model will facilitate greater consistency

[21] Contracting Parties may describe how their integrated national energy and climate plans are implementing the just transition considering the different impacts on opportunities for men, women and gender diverse people in transitioning regions, what obstacles exist, and what plans they have planned and implemented to move forward.
[22] Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council
[23] Commission Implementing Regulation (EU) 2022/2299 of 15 November 2022 laying down rules for the application of Regulation (EU) 2018/1999 of the European Parliament and of the Council as regards the structure, format, technical details and process for the integrated national energy and climate progress reports
[24] Regulation (EU) 2021/1056 of the European Parliament and of the Council of 24 June 2021 establishing the Just Transition Fund

with the EU legal acquis and support the EU accession process. Since in the EU context, TJTPs serve as financing instruments, Contracting Parties can adopt a similar approach and use their Just Transition Plans as strategic frameworks for mobilising and coordinating funding for the transition.

Therefore, this section outlines the suggested framework and content of a Just Transition Plan (both hereinafter referred to as "JTP") for the Energy Community Contracting Parties, based on the EU acquis and centred on the adapted Governance Regulation. The recommendations provided in these Policy Guidelines are primarily based on Regulation (EU) 2021/1056—which, while non-binding for Contracting Parties, offers valuable guidance, particularly Article 11 on TJTPs. The proposed content of a JTP has been outlined in a template included as Annex II of these Policy Guidelines. In accordance with Implementing Regulation (EU) 2022/2299 and the overarching objective of ensuring a just and sustained energy transformation, JTPs should promote both human rights and gender equality, and address inequalities in energy poverty.

JTPs can be created at the regional or national level. However, when prepared at the national level, it is essential to clearly define the territorial scope of the plan and ensure that the region in transition has adequate ownership over both its formulation and implementation. This is further outlined in Section 5.5.

The JTP for the Energy Community Contracting Parties can be structured into five sections. The first section should describe the **transition process** and identify the territories most negatively affected. This would be followed by an **impact assessment of the planned transition**. The third section should define the **development needs and objectives** to address the identified impacts, ensuring that the expected outcomes are aligned with relevant national, regional, or local strategies and plans. The fourth section should outline the **types of operations** needed to achieve the objectives, thus alleviating the assessed impacts. Finally, the fifth section should present the **governance framework/mechanism**, covering partnership structures, monitoring and evaluation measures, and coordination mechanisms and monitoring bodies and the roles of responsible institutions. All of these elements are part of the TJTPs in the EU and are outlined in Article 11 of Regulation (EU) 2021/1056, yet, they have adapted and streamlined for the Energy Community Contracting Parties.

5.1. Transition process

In the first part, the JTP should outline an overview of the national transition process with a timeline for phasing out or scaling down coal and lignite mining or/and coal-fired electricity production. This would include key transition milestones for achieving the 2030 energy and climate targets and a climate-neutral economy by 2050. These steps should be consistent with the Contracting Party's NECP and Long-Term Strategy, notably including (i) the planned investments, (ii) the timeframe of the key transition steps, (iii) contribution to national targets, (iv) the objectives to be achieved and (v) the actions to be taken for the just transition. The JTP should demonstrate clear evidence of a transition process and its impact at the level of the concerned territory in the near future (by 2030 or before).

The territories expected to be the most negatively impacted by the transition, based on the economic and social impacts, should be identified[25]. This includes an analysis of the expected challenges faced by workers, such as potential job losses in fossil fuel production and use, as well as the transformation needs of industrial facilities with the highest greenhouse gas intensity. The specific territories covered by the JTPs should be coherent geographical areas and to the extent possible reflect functional territorial economic areas, which correspond to the communities, labour markets and economic activities affected by the installations and related firms involved in fossil fuel activities or GHG-intensive industrial processes.

5.2. Economic, social, and regional impact assessment of the transition

Following part one, an analytical part in the form of a social, economic and environmental transition impact assessment should be prepared. The social impact of the transition is primarily linked to employment, with direct consequences for the livelihoods of households and families, social exclusion and important gender implications. On the other hand, the economic impact of the transition will differ between declining and transforming sectors. The decline of fossil fuel extraction, production and use is associated with closure of mines and extraction sites, loss of assets and decommissioning of fossil fuel-fired power plants. The closure of mines and the decommissioning of fossil fuel-fired power plants will entail associated structural changes in related industries (e.g., mining equipment manufacturing, processing industries, or transport and logistics). It will also have an impact on energy-intensive industries, such as steel production, which adds to the transformation needs of these industries and regions. All of these aspects should be identified and evaluated.

The identification of the economic activities and industrial sectors impacted by the transition should distinguish between declining and transforming sectors. This should be undertaken in close cooperation with municipalities. Declining sectors are expected to cease or significantly scale down their activities, while transforming sectors are expected to undergo a transformation of their activities, processes, and outputs. For each type of sector, it is necessary to assess the impacts in terms of the potential number of affected jobs and job losses, requalification needs, considering skills forecasts, depopulation risks, economic diversification potential, and development opportunities, such as post-mining land management and development, including a corresponding timeline

As for the environmental impacts, the cessation of extraction activities, the closure of mines or the decommissioning of certain production plants can be associated with derelict land, contamination of soil and water, geophysical instability, or other environmental hazards, including health risks. For peatlands there may be an impact, even after peat extraction activities have ceased, on the degradation of ecosystems and their ability to perform ecosystem services (including absorbing and storing carbon). Environmental impacts of transition developments, whether positive or negative, should be evaluated.

In some cases, the transition may have wider demographic impacts when, because of the decline of certain sectors, a region becomes a less attractive place to live and work. Young people can be especially affected, not only because they face above average levels of unemployment but also because they are more inclined to migrate out of the region. Likewise, elderly people, minorities and workers with disabilities, occupational diseases or other (mental) health issues can also be disproportionally hit by the transition.

This segment of the JTP should focus on the transition challenges faced by the territories identified as most negatively affected by the transformation or closure of greenhouse gas-intensive activities. Therefore, it should include only those challenges that are directly related to the transformation or closure of GHG-intensive activities, and can be guided notably by the following questions:

- *What is the relative importance of the transforming and/or declining sectors within the regional economy? Is there a further impact on other sectors or on the broader economic fabric of the territory? Does the transition affect small and medium-sized enterprises (SMEs) and/or large enterprises? What is the economic diversification potential of the region? Is there an adequate business support system in the territory?*

- *How many jobs are potentially lost or affected because of the transformation or closure, including through early retirement? How does this number compare to overall employment in the territory, and, where relevant, in relation to specific communities or companies?*

- *Is there any distributional impact assessment of the expected transformations on the affected different income groups? Is there an adequate tax and benefit system in place to compensate any negative distributional impacts on the lowest incomes?*

- *Which reskilling or upskilling needs can be identified, taking into account both the forecasted developments in transforming sectors as well as the skills needs stemming from economic diversification?*

- *What are the development needs and objectives of the regional economic sectors, workers, and local communities, stemming from the transition process?*

- *Is the education and training sector adapted to the transition challenges? Does it have systems in place to exchange information with companies in the territory about their current and future skills needs? Does the education and training system have the autonomy and capacity to respond timely to the needs of the companies in the territory and to the needs of companies that may be ready to invest in the territory (i.e., to adapt or develop learning curricula, training programmes and work-based learning)? Do the systems for guidance, counselling, and validation of prior learning work in practice? Are they easily accessible for jobseekers? Do companies themselves invest in the skills of their employees and how does that happen in practise? Is good use made of available skills intelligence?*

- *Does the transition to climate neutrality have broader social impacts, such as impacts on community cohesiveness, living conditions, energy poverty or access to public services, which are affecting the territory?*

- *Is there a depopulation risk specifically related to the transition to a climate-neutral economy, and in which parts of the population? Are young people specifically affected by the transition?*

- *Is the social services sector adapted to transition challenges? Does it have the capacity to cope with the potential influx of "new clients"? Does it have the means to provide new services and interventions complementing labour market transition and attachment of the beneficiaries? Does it have the necessary cooperation protocols with active labour market policies, training, and education sectors to complement the system of support comprehensively? Are community social services available?*

- *Do negative environmental impacts have to be addressed following the transition, for instance impacts on soil or water quality, impacts on the condition of ecosystems or impacts related to land rehabilitation?*

5.3. Development needs and objectives

A detailed description of development needs to address the transition challenges, along with objectives and results expected through the implementation of the JTP should be provided. Consistency of the expected objectives and results with other relevant national, regional, or local strategies and plans should be ensured. This includes identifying key areas requiring support and intervention to mitigate negative impacts. The implementation of the JTP should prioritize aims to creating and preserving jobs while supporting economic diversification and development in affected regions.

For territories impacted by the transition to achieve greater economic diversification, support to enterprises and economic stakeholders such as support for productive investment in SMEs (including micro-enterprises and start-ups) is encouraged. This also applies to the creation of new firms, including through business incubators and consulting services. Due importance should be given to sectors with a strong job creation potential, so to mitigate negative repercussions on employment, particularly in sectors with growth potential, such as the raw materials value chain.

To mitigate the negative repercussions on employment, the upskilling and reskilling (including training) of workers and jobseekers in sectors with a local employment potential (either existing or to be created) should be supported. In addition, support to job-search assistance (guidance and counselling, assessment and validation of prior learning) for jobseekers and support their active inclusion in the labour market should be provided. The assistance to jobseekers can also benefit dismissed workers who have lost their job in sectors in the JTP territories even if they are not residing in that territory.

5.4. Types of operations

This part of the JTP should describe the types of operations envisaged and their expected contribution to alleviating the negative impacts of the transition. More precisely, it consists of identifying the types of operations needed to address the previously assessed impacts of the transition on the territories identified in the JTP to facilitate and assist employment opportunities in new sectors, secure economic development for the territories, and ensure access to clean, secure, and affordable energy for all. This would encompass upskilling and reskilling, training for affected workers, and creating attractive conditions for public and private investors. The operations envisioned should promote equality and prioritize vulnerable groups disproportionally affected by the transition, including women, workers, and the energy poor.

To determine the list of operations and enterprises to be supported, a supplementary gap analysis can be conducted by analysing a baseline and an investment scenario in terms of expected job losses and the expected number of jobs created. This could be supported by a list of potential domestic and international financing sources for financing the just transition. The outlined types of operations should show consistency with those described in other relevant national, regional, or territorial strategies and plans.

Types of operations should be accompanied by a timetable, the designation of responsibilities and estimated resources required for their implementation. The description of the type of operation should be accompanied by the expected contribution to alleviating the impact of the transition. Based on the types of operations envisaged, programme- specific output or result indicators, as set out in Annex III of these Policy Guidelines, may be used. For output indicators, the baselines should be set at zero.

5.5. Governance mechanism

The JTPs can only reflect and address the real situation on the ground and have an impact on the just transition if all relevant national, regional and local stakeholders are involved and take ownership of the transition in their territory. Local stakeholders, including economic and social partners (such as trade unions, including those representing coalminers), and bodies representing civil society (including youth organisations, environmental NGOs, etc.) should be fully mobilised in the debate on the future of their territories. To assist the implementation, monitoring and evaluation phases properly and actively, such stakeholders should be included as members of monitoring committees. In addition, they should have their own local arrangements to monitor the implementation of the JTPs.

A future-proof economy cannot be built without involving those who will live in and shape the future. The involvement and commitment of the public and of all stakeholders is crucial to the JTP's success. In particular, to address the specific situation and role of women in the transition to the climate-neutral economy, gender equality should be promoted. Women's labour market participation and entrepreneurship, as well as equal pay, play an important role in ensuring equal opportunities. It is also essential for young people to be actively involved in the JTP's governance.

A clear organisation of the governance mechanism of the just transition planning should cover three sub-sections including (i) **partnership arrangements**, (ii) **planned monitoring and evaluation measures**, and (iii) the **designated coordination and monitoring bodies**.

Regarding partnerships, national governments could organise a comprehensive partnership, including at least regional and local authorities, economic and social partners, civil society (such as environmental partners and, non-governmental organisations) and research institutions and universities. These partners should also be involved throughout the preparation, implementation, and evaluation of JTPs. The JTP could build on strong cross-border regional cooperation, identify areas for joint planning, and leverage national strengths to address regional challenges efficiently. Coordinated approaches, especially towards investments into renewable energy and its infrastructure, enhance predictability and investment certainty. Practices for engaging various stakeholder groups throughout the preparation, consultation, and implementation of the JTP would be detailed. This includes involving local and regional authorities, national and international organisations, affected communities, particularly the most vulnerable, and international institutions. The outcomes of public consultations should be publicly available.

Monitoring and evaluation measures should be defined to justify the JTP's ability to achieve its objectives. This should include a clear outline of the responsible bodies and their specific roles in the implementation and monitoring of the JTP.

6. CONCUSION

The Energy Community has firmly embedded just transition principles into its overarching energy and climate governance framework, including their integration into the National Energy and Climate Plans, and associated reporting obligations, as mandated by the adapted Governance Regulation and its Implementing Regulation. The commitment to develop dedicated Just Transition Plans and align them with NECPs reflects a shared regional effort to ensure that the energy transition is not only environmentally sustainable but also socially equitable. Consistency between NECPs and any supplementary energy and climate planning documents will be essential to ensure overall coherence, secure domestic and international financing, implementation feasibility, and social buy-in.

RECOMMENDATIONS

The following recommendations are made for the national and regional authorities:

I. **Integrate just transition as a core component:** Given the requirements of the Governance Regulation and its Implementing Regulation, Contracting Parties should ensure that just transition considerations are fully integrated into National Energy and Climate Plans. Where coverage is insufficient, this should be addressed through comprehensive supplementary documents such as national or regional Just Transition Plans.

II. **Undertake detailed territorial assessments:** Just Transition Plans should be based on a granular identification of territories most impacted by decarbonisation, supported by thorough socio-economic and environmental impact assessments. This will provide the analytical foundation for developing tailored responses.

III. **Link operations with financing and timelines:** Just Transition Plans should include a clear, time-bound portfolio of operations aligned with concrete financial resources. These plans can serve as investment roadmaps, enhancing credibility and facilitating access to both public and private sources of just transition finance.

IV. **Use JTPs as investment roadmaps to attract financing:** Although no dedicated financing is currently available solely for just transition in the Energy Community, the preparation of comprehensive and credible Just Transition Plans can significantly increase the chances of mobilising both public and private funding in the future. By outlining a clear, time-bound portfolio of operations, supported by impact assessments and stakeholder engagement, Just Transition Plans can serve as strategic investment roadmaps. They demonstrate readiness, improve investor confidence, and help align national and regional priorities with the criteria of potential funding instruments — including international financial institutions, development banks, and bilateral donors.

V. **Strengthen stakeholder engagement and ownership:** Meaningful consultation with regionally affected stakeholders and full public access to information must be ensured throughout the planning and implementation phases. Local ownership is a key enabler of a successful and fair transition.

VI. **Plan with precision:** Just Transition Plans should be seen not only as policy statements but as operational investment plans. As such, they must include well-defined measures within fixed timeframes, implementation responsibilities, governance arrangements, and monitoring systems to ensure accountability and measurable progress.

ANNEX I

INFORMATION ON HOW THE IMPLEMENTATION OF THE NATIONAL ENERGY AND CLIMATE PLAN CONTRIBUTES TO JUST TRANSITION, PROMOTION OF BOTH HUMAN RIGHTS AND GENDER EQUALITY AND ADDRESSING INEQUALITIES IN ENERGY POVERTY

Annex I Table 1: Impact of the implementation of the national energy and climate plan on jobs, workers, and regions

Impact	***Optional information to be provided***
Expected impacts on jobs, labour markets and skills	*Quantitative elements on the expected evolution of labour market as a result of policies (e.g. sectors that will grow, others that will shrink, and by how much) and describe measures adopted/to be adopted to accompany this transition, including as regards education and training policies as well as social protection.*
Expected distributional impacts amongst population	*Expected impacts of policies on overall population as well as specific groups, especially the most vulnerable, reflecting as well whether some groups will benefit more than others, and describe measures aimed to ensure fairness and equal burden sharing in that respect.*
Expected impact for most affected regions	*Expected impacts of policies on regions that are to be most affected by the transition, especially coal, peat or oil shale regions or carbon-intensive regions, and mitigating measures to address socioeconomic consequences in such areas. Contracting Parties are encouraged to provide quantitative indicators such as jobs, economic output and local tax revenue*
Expected impact on quality of life, well-being	*Expected impacts on reducing environmental hazards, degradation and pollution, improving the access to safer products, intact ecosystems and their services (food, clean air, water, climate stability etc.), secure livelihoods and benefit health and well-being, including healthier working condition, e.g., limiting emission and improving air quality standards of workplaces*
Expected impacts on costs	*Expected impacts on costs introduced as a result of climate, energy and environmental policies for both business and consumers (e.g., energy savings lower energy cost; more durable products lower costs for replacement; lower costs for environmental clean-up and public health)*
Inclusiveness and participatory processes	*Expected impacts of measures to ensure inclusiveness of climate, energy and environmental policies, in particular as regards low-income households and communities directly affected by the transition, for instance in most affected regions, through e.g. the implementation of green infrastructure and public services, participatory processes, etc.*

Annex I Table 2: Impact of the implementation of the national energy and climate plan on the promotion of human rights and gender equality and addressing inequalities in energy poverty

Impact	***Optional information to be provided***
Promotion of human rights	*Climate justice and just transition also address the sharing of benefits and burdens of climate change from a human rights perspective. Climate change threatens the effective enjoyment of a range of human rights including those to life, water and sanitation, food, health, housing, self-determination, culture and development. Contracting Parties may describe how the implementation of their integrated national energy and climate plans contributes to their obligation to prevent the foreseeable adverse effects of climate change and ensure that those affected by it, particularly those in vulnerable situations, have access to effective remedies and means of adaptation to enjoy lives of human dignity.*
Promotion of gender equality	*Contracting Parties may describe how their integrated national energy and climate plans are implementing the just transition considering the different impacts on opportunities for men, women and gender diverse people in transitioning regions, what obstacles exist, and what plans they have planned and implemented to move forward*
Addressing inequalities in energy poverty	*The implementation of the NECPs has the potential to significantly reduce energy poverty by providing energy efficiency, renewable energy access, and targeted support particularly to energy poor households. However, without a clear objective, targeted measures and financing resources, there is a risk that the transition may deepen existing inequalities, especially if low-income groups are not adequately supported in adapting to higher energy costs or structural changes.*

ANNEX II

RECOMMENDED TEMPLATE FOR A JUST TRANSITION PLAN

1. Executive summary

2. Overview of the transition process

2.1 The Transition Agenda

Outline of the expected transition process towards the Energy Community 2030 energy and climate targets and a climate-neutral economy by 2050, aligning with the objectives of the integrated national energy and climate plans and other existing transition plans with a timeline for ceasing or scaling down activities such as coal and lignite mining or coal-fired electricity production.

2.2 Regions in Transition

Identification of the regions expected to be most negatively affected by the transition, based on the transition needs outlined in Section 2.1.

3. Economic, social, and regional impact assessment of the transition

3.1 Declining Economic Sectors

Identification of sectors phasing out/scaling down due to the transition, including timeline.

Impact analysis, such as expected job losses, requalification needs, depopulation risks, economic diversification, and development opportunities.

3.2 Transforming Economic Sectors

Identification of sectors undergoing transformation, including timeline for transformation.

Impact analysis, such as expected job losses, requalification needs, depopulation risks, economic diversification, and development opportunities.

4. Development needs and objectives

Formulation of development needs to address the transition challenges, as well as objectives and results expected through implementation of the Plan. Ensure consistency of the expected objectives and results with other relevant national, regional or territorial strategies and plans.

5. Types of operations

5.1 List of types of operations

List of types of operations, including timeline, cost estimates, and designated responsibilities, making use of output or result indicators (see Annex III).

6. Governance mechanisms

Proposed governance at national, local, and territorial levels to guarantee implementation of the Plan.

6.1 Partnership

Partner engagement in preparation, implementation, monitoring, and evaluation. Outcomes of public consultations.

6.2 Monitoring and Evaluation

Planned monitoring and evaluation measures of the Plan, including indicators to measure the ability of the plan to achieve the transition objectives.

6.3 Coordination and Monitoring Bodies

Body or bodies responsible for coordinating and monitoring the implementation of the Plan and their role.

ANNEX III

OUTPUT AND RESULT INDICATORS FOR MONITORING AND EVALUATING A JUST TRANSITION PLAN[26]

Outputs	***Results***
1. Enterprises supported (of which: micro, small, medium, large)(*) *2. Enterprises supported by grants* *3. Enterprises supported by financial instruments* *4. Enterprises with non-financial support* *5. RCO 05 - New enterprises supported* *6. Research organisations participating in joint research projects* *7. Enterprises cooperating with research organisations* *8. Enterprises supported to achieve the reduction of greenhouse-gas emissions*	*1. Jobs created in supported entities* *2. Research jobs created in supported entities* *3. Private investments matching public support (of which: grants, financial instruments) (*)* *4. Small and medium-size enterprises (SMEs) introducing product or process innovation* *5. SMEs introducing marketing or organisational innovation* *6. SMEs innovating in-house* *7. Patent applications submitted* *8. Estimated greenhouse-gas emissions from*
9. Value of digital services, products and processes developed for enterprises	*9. Users of new and upgraded public digital services, products and processes* *10. Users of new and upgraded digital services, products and processes developed by enterprises*
10. Capacity of incubation created	*11. New enterprises surviving in the market* *12. SMEs using incubator services after incubator creation*
11. SMEs investing in skills for smart specialisation, for industrial transition and entrepreneurship	*13. Apprenticeships supported in SMEs* *14. SMEs staff completing training for skills for smart specialisation, for industrial transition and entrepreneurship (by type of skill: technical, management, entrepreneurship, green, other) (*)*
12. Dwellings with improved energy performance *13. Public buildings with improved energy performance* *14. District heating and cooling network lines newly constructed or improved* *15. Number of high efficiency co-generation units* *16. Additional production capacity for renewable energy (of which: electricity, thermal)(*)*	*15. Annual primary energy consumption (of which: dwellings, public buildings, enterprises, other) (*)* *16. Estimated greenhouse gas emissions* *17. Total renewable energy produced (of which: electricity, thermal) (*)* *18. Additional operational capacity installed for renewable energy*
17. Additional capacity for waste recycling *18. Investments in facilities for separate waste collection* *19. Waste prepared for re-use*	*19. Waste recycled* *20. Waste used as raw materials*
20. Green infrastructure supported for other purposes than adaptation to climate change *21. Surface area of rehabilitated land supported* *22. Area covered by systems for monitoring air pollution installed*	*21. Population benefiting from measures for air quality* *22. Rehabilitated land used for green areas, social housing, economic or other uses*
23. Length of new tram and metro lines *24. Length of reconstructed or modernised tram and metro lines* *25. Capacity of environmentally friendly rolling stock for collective public transport* *26. Dedicated cycling infrastructure supported* *27. Cities and towns with new or modernised digitised urban transport systems*	*23. Annual users of new or modernised public transport* *24. Annual users of new or modernised tram and metro lines* *25. Annual users of dedicated cycling infrastructure*
28. Surface of new or modernised facilities for employment services	*26. Annual users of new or modernised facilities for employment services*
29. RCO 66 - Classroom capacity of new or modernised childcare facilities *30. Classroom capacity of new or modernised education facilities*	*27. Annual users of new or modernised childcare facilities* *28. Annual users of new or modernised education facilities*
31. Population covered by projects in the framework of integrated actions for socioeconomic inclusion of marginalised communities, low-income households and disadvantaged groups	
32. Capacity of new or modernised health care facilities *33. Capacity of new or modernised social care facilities (other than housing)*	*29. Annual users of new or modernised e-health care services* *30. Annual users of new or modernised health care facilities* *31. Annual users of new or modernised social care facilities*
Output and Result Indicators for participants (1), (2)	
34. unemployed, including long-term unemployed *35. inactive* *36. employed, including self-employed* *37. number of children below 18 years of age* *38. young people between 18 and 29 years of age* *39. number of participants of 55 years of age and above* *40. with lower secondary education or less (ISCED 0-2)* *41. with upper secondary (ISCED 3) or post-secondary education (ISCED 4)* *42. with tertiary education (ISCED 5 to 8)* *43. total number of participants (3)*	*32. participants engaged in job searching upon leaving* *33. participants in education or training upon leaving* *34. participants gaining a qualification upon leaving* *35. participants in employment, including self-employment, upon leaving*

(*) Breakdown only for reporting.
(1) All output, and result indicators related to participants are to be reported.
(2) Personal data are to be broken down by gender (women, men, non-binary persons, according to national law). If certain results are not possible, data for those results do not have to be collected or reported. Where appropriate, common output indicators can be reported based on the target group of the operation. When data are collected from registers or equivalent sources, Contracting Parties may use national definitions.
(3) This indicator shall be calculated automatically on the basis of the common output indicators relating to employment status.

[26] As provided in Annex III of Regulation (EU) 2021/1056 of the European Parliament and of the Council of 24 June 2021 establishing the Just Transition Fund.

Annex III Table 1. Output Indicators

Specific objective	*Indicator*	*Measurement unit*	*Milestone (e.g. 2025)*	*Target (e.g. 2030)*

Annex III Table 2. Result indicators

Specific objective	*Indicator*	*Measurement unit*	*Baseline or reference value*	*Reference year*	*Target*	*Source of data*	*Comments*

ANNEX IV

STATE OF PLAY ON JUST TRANSITION IN NECPS

NECPs undergo a mandated review process and compliance check in accordance with the adapted Governance Regulation. This regulation also outlines the schedule for submitting draft and adopted NECPs to the Energy Community Secretariat by mid-2023 and mid-2024 respectively, as well as for submitting Integrated Progress Reports in early 2025.

For many NECPs, the Energy Community Secretariat's recommendations highlighted the lack of sufficient integration of just transition aspects in the plans[27]. More concretely, just transition aspects were not sufficiently integrated into the NECPs at the level of objectives and policies and measures (PaMs), addressing the social, employment, and skills impacts of the transition process. In principle, the information outlined in Annex I should be the basis of a NECP with regard to just transition. Four Contracting Parties have limited just transition to a single PaM, while Kosovo* dedicated a chapter describing some of the implications of a just transition (see Table 1). To date, only North Macedonia has adopted a Just Transition Roadmap. Other Contracting Parties, including Bosnia and Herzegovina, Kosovo*, Montenegro and Serbia, are currently in the process of preparing these documents.

ANNEX IV Table 1. Examples of Policies and Measure found in NECPs

Contracting Party	Source of information	Title of Policy and Measure	EnCS recommendations on just transition in draft NECPs
Serbia	Draft NECP	Implementation and monitoring of Just Transition Plan and related Action Plan, selected elements of a just transition described	Overall, just transition aspects have not been sufficiently taken into account in the document as it is limited to impacts on the job market. The draft NECP stipulates that the PaMs, which will be integrated into the Just Transition Plan (JTP), will be implemented in the areas that will be affected most. That said, the draft NECP lacks PaMs on just transition except the implementation and monitoring of a JTP. Integrate fair and just transition aspects better both on the level of objectives and in PaMs, notably by providing more details on social, employment and skills impacts of planned objectives, and PaMs. Prioritise the implementation and monitoring of Just Transition and the related Action Plan via an active planning for the transition of the regions and communities impacted by the coal phase-out, as well as incorporate more just transition PaMs in the NECP itself.
Ukraine	Draft NECP	State Target Program for Just Transition of Coal Regions of Ukraine for the period up to 2030, selected elements of a just transition described	Integrate the just transition dimension more deeply into the NECP, going beyond providing a reference in only one PaM. Consider extending the just transition concept, currently limited to coal regions only, to regions using additional criteria, such as GHG emission- and energy intensive industry, as well as regions that are expected to face challenges and require managed change due to war-inflicted damage and the green transition. Provide more information in the PaM on just transition regarding the concrete measures to be taken and how their impacts will be monitored, with a participation of local and regional authorities.
Bosnia and Hercegovina	Draft NECP	Just transition of the energy sector	There is only one PaM related to just transition, which includes the implementation of a Roadmap for the transition of coal-rich regions until 2025. It is unclear what specific document is referred to as the Roadmap. Moreover, considering the role of coal in the energy sector of Bosnia and Herzegovina and the potential impact of the decarbonisation, it is important that there is a clear indication of planned actions going beyond 2025, aiming at the support of regions for a successful management of the transition. Thus, integrate fair and just transition aspects both on the level of objectives and in PaMs, by adding PaMs on just transition aspects also for the post-2025 period, and by providing more details regarding the social, employment and skills related

[27] All Energy Community Recommendations on NECPs can be accessed under https://www.energy-community.org/implementation/package/NECP.html and downloaded for Albania, Bosnia and Herzegovina, Georgia, Kosovo*, Moldova, North Macedonia, Serbia and Ukraine.

			impacts of planned objectives and PaMs.
North Macedonia	Adopted NECP	Program for just transition, selected elements of a just transition described	The draft NECP emphasizes important co-benefits of decarbonisation, such as the creation of green jobs or the health benefits of reduced air-pollution. The notion of just transition is mentioned, yet concrete indicators and targets, as well as the interactions among different sectors of the economy and society are not well described. Analyse the just transition dimension on the basis of indicators and targets in the final NECP, including socio-economic impact and energy poverty.
Kosovo*	Draft NECP	No PaM on just transition, selected elements of a just transition described	There is no PaM addressing the issue of a fair and just transition and outlining how support activities for the impacted communities would be managed. Considering the prominent yet declining role of lignite in electricity generation at least until 2040 and the plans to maintain domestic lignite production, provide a detailed planning of the PaMs to prepare the society and economy to manage the phase-down, ensuring a just and fair transition.
Montenegro	Not available	Not available	Not available
Albania	Adopted NECP	No PaM on just transition, selected elements of a just transition described	None
Georgia	Draft NECP	No PaM on just transition, selected elements of a just transition described	Good overview of the impacts of PaMs on energy transition elements such as employment and household incomes
Moldova	Draft NECP	No PaM on just transition, selected elements of a just transition described	None