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**The European Green Deal and the ‘Leave No One Behind’ principle: state of the art, gaps and ways forward**



**Sebastiano Sabato**, European Social Observatory  
and  
**Josefine Vanhille**, University of Antwerp

## **The European Green Deal and the 'Leave No One Behind' principle: state of the art, gaps and ways forward**

Study commissioned by the Belgian Federal Minister for Climate, Environment, Sustainable Development and Green Deal in the framework of the 2024 Belgian Presidency of the Council of the EU

**Sebastiano Sabato**

European Social Observatory  
and

**Josefine Vanhille**

University of Antwerp

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## Key messages for policymakers

The objective of this study is to assess how the 'leave no one behind' (LNOB) principle has so far been considered in the implementation of the European Green Deal (EGD), to ensure a *just, green transition*. Our analysis shows that – since the publication of the EGD Commission Communication in 2019 – an **EU framework for a just transition** is emerging. This framework is made up of a few EU initiatives explicitly aimed at ensuring a just transition (i.e. at addressing certain social challenges emerging from the green transition and, in some cases, providing funding for this purpose) and of some provisions mainstreaming (to varying extents) just transition considerations into other initiatives implementing the EGD. While the development of such a framework in a relatively short time period is not a negligible result, the emerging EU just transition framework is still **insufficient** when compared to the magnitude of the challenges ahead: besides ensuring full implementation, **this framework should be significantly broadened and made more effective**. This is particularly urgent in the context of the reflections on setting the 2040 climate target, launched in February 2024 with the publication of the Commission Communication.

## Gaps and limitations of the EU framework for a just transition and policy implications

### *Scope, mainstreaming and coherence*

Integration of the just transition dimension into the implementation of the EGD has, to date, been **uneven and incomplete**. This is particularly true for the implementation of certain particular EGD macro areas such as 'From Farm to Fork', 'Preserving and restoring ecosystems and biodiversity', and 'A zero pollution ambition for a toxic-free environment'.

The just transition perspective is relatively **limited in several policy instruments** implementing the EGD: in some cases this objective is merely referred to, in others there is a focus on specific issues/target groups. Key EU just transition initiatives, such as the Just Transition Fund (JTF) and the Social Climate Fund (SCF), were developed as a corrective to potentially regressive social consequences of initiatives primarily pursuing 'green' objectives. To develop a coherent just transition framework guided by the LNOB principle, this 'corrective stance' should be combined with **more consistent mainstreaming of just transition considerations** into EU policies, in order to create synergies and avoid counterproductive social effects.

## Policy implications

1. A more integrated approach to policy-making is needed to ensure more consistent mainstreaming of the just transition dimension into the legislation implementing the EGD, particularly in those macro-areas where implementation is lagging behind and the just transition perspective appears less developed.
2. There needs to be more systematic and comprehensive ex-ante and ex-post measurement of the distributional and wider socioeconomic impacts of climate and environmental initiatives implementing the EGD (including measurements of the co-benefits of these policies). It is important to further develop the Distributional Impact Assessment methodology (DIA) currently being discussed at the EU level along these lines, and to apply it consistently.

### *Comprehensiveness and integration*

The targets of the emerging EU just transition framework **emphasise specific territories, and sectors or issues** (notably regions that rely heavily on fossil fuels for energy or greenhouse gas intensive industries, energy and transport poverty, the need to re-skill and up-skill the workforce). Other vulnerabilities related to both the social implications of the green transition and the consequences of climate change and environmental degradation have been identified more vaguely (including gender-related vulnerabilities). Additionally, **the links between green transition and welfare policies should be further developed** at EU and national levels, particularly regarding social protection and inclusion systems.

## Policy implications

3. The role of the 2022 Council Recommendation on ensuring a fair transition towards climate neutrality in EU policy-making must be enhanced, and its implementation closely monitored. Further reflection is needed on how to link green transition policies and welfare policies more closely, in particular social protection and inclusion policies. Innovative and more integrated policy options in this respect should be explored, including through exchanges in EU mutual learning fora.

### *Knowledge basis*

A **deeper understanding of 'socio-ecological risks'** is needed, as well as EU **indicators** able to measure these risks in an integrated manner.

## Policy implications

4. It is important to work on developing more integrated socio-ecological indicators and to explore ways to include them in EU policy-making, either through the creation of an EU Just Transition Scoreboard or by integrating them into existing scoreboards, such as the European Pillar of Social Rights (EPSR) Social Scoreboard.

## ***Funding***

EU instruments directly providing funding for just transition policies are limited. The financial resources of both the JTF and the SCF are **insufficient to achieve their stated objectives**: a stocktaking exercise assessing the functioning of the available funds relevant to the just transition, including their adequacy, synergies, overlaps and absorption rate in the Member States, should be carried out. Since EU funds are not intended to provide all the resources needed, the Member States should have enough budgetary scope to implement just transition policies; this – according to many observers – will not be the case under the **reformed EU economic governance framework**.

### **Policy implications**

5. A careful assessment needs to be carried out of the functioning of the existing EU funds relevant to the just transition, including their adequacy, their ability to reach groups and categories vulnerable to the consequences of green transition policies, their continuity in time, and synergies and overlaps. Funding policies integrating green and social objectives from a just transition perspective should be a key priority for future EU overarching funding sources such as the Recovery and Resilience Facility (RRF) (if any RRF-like instrument is established in the future).

## ***Stakeholders' involvement***

The ambition visible in the EU's just transition initiatives to enhance stakeholders' involvement and citizens' participation does not seem to match the reality in the Member States, where **stakeholder involvement varies considerably**. Limitations have, for instance, been identified in the multi-level climate and energy dialogues and in the design and implementation of the JTF's Territorial Just Transition Plans.

### **Policy implications**

6. Stakeholder and citizens' involvement should be a key area for the Commission's monitoring of the implementation of just transition policies in the Member States. In particular, there should be close monitoring of Member States' implementation of the '2023 Council Recommendation on strengthening social dialogue in the European Union', especially in the context of the green transition. The recent proposal by the European Economic and Social Committee to adopt a 'Directive for Just Transition of the World of Work' should be taken into consideration.
7. Besides the need to strengthen existing social dialogue and civil dialogue procedures, experiments with more innovative participatory methods, such as deliberative mini publics, could be further explored.

## ***'Bindingness' on Member States and EU monitoring***

In many cases, the EU instruments relevant to the just transition are recommendations and guidelines to the Member States, which leave countries considerable freedom as to whether and how to implement just transition policies. There needs to be **better and more stringent EU**

**monitoring of national just transition policies**, especially regarding the 2022 Commission Recommendation on ensuring a fair transition towards climate neutrality and other instruments for which the Commission undertook to formulate just transition guidelines. The **European Semester** and the **National Energy and Climate plans** (NECPs) emerge as key governance procedures in this respect.

### Policy implications

8. A just transition perspective should be fully integrated into the European Semester. The Semester is a key process for monitoring the implementation of the 2022 Council Recommendation on ensuring a fair transition towards climate neutrality.
9. The knowledge basis of the European Semester must therefore be broadened, including the use of more integrated eco-social indicators and broader well-being indicators.
10. In order to improve the quality of the policy-making process, fully combining environmental and climate-related objectives and concerns with social objectives and concerns, enhanced cooperation and exchanges are needed between the EPSCO Council and the ENV Council and their Committees. The possibility of organising regular joint meetings should be explored.

### *Level of ambition*

The limitations and gaps of the EU just transition framework call for more ambitious EU just transition policies and an increased role for the EU in this domain. At the EU level, more ambitious green transition policies should go hand in hand with more ambitious, comprehensive and effective social policies. Adopting a fully integrated 'eco-social approach' will require a reflection on the **EU's rather limited social policy competences**, given the increasing imbalance between binding EU environmental/climate measures and targets and more limited scope for action and resources in the social domain. Besides institutional aspects, such an ambitious approach would require the implementation of **more innovative and integrated 'eco-social policies'**, less reliant on economic growth. Possible gradual steps in this direction should be explored, by creating **more tangible links and synergies between green transition policies and the European Pillar of Social Rights**.

### Policy implications

11. It is important to reflect on how to better combine green transition objectives with the principles of the European Pillar of Social Rights. The forthcoming Commission review of the EPSR Action Plan (foreseen in 2025) should pay particular attention to the socio-ecological dimension. A 'revamped' Action Plan should fully include measures listed in the 2022 Council Recommendation on ensuring a fair transition towards climate neutrality, but it should also explore the possibility of implementing eco-social policies which are more innovative and integrated from a sustainable welfare perspective. Examples of the latter include universal basic services, working time reduction, and less growth-reliant ways of financing welfare policies.

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## Introduction

The main objective of this study is to assess how the 'leave no one behind' (LNOB) principle has, so far, been taken into account in the implementation of the European Green Deal (EGD), with a view to ensuring a *just*, green transition. In line with the European Commission (2019a) Communication on the EGD, in this study we relate the LNOB principle to the notion of promoting a just (green) transition. Indeed, one of the main ambitions of the EGD is to ensure that the green transition <sup>(1)</sup> is 'just and inclusive [...] put[ting] people first, and pay[ing] attention to the regions, industries and workers who will face the greatest challenges' (European Commission 2019a: 2, bold in the original removed). Starting from a broad understanding of the notion of a just transition, we focus on two dimensions which appear key to the implementation of the LNOB principle in the EGD (see Section 1.1) : i) the green transition-related vulnerabilities to be addressed (i.e. the *targets* of green transition policies); and ii) the interaction (and possible integration) between EU green transition policies and welfare policies (building on the *functions* that welfare states could perform in the green transition).

This study focuses on the eight macro-areas for action identified in the 2019 EGD Communication (European Commission 2019a):

1. *Increasing the EU's climate ambition for 2030 and 2050;*
2. *Supplying clean, affordable and secure energy;*
3. *Mobilising industry for a clean and circular economy;*
4. *Building and renovating in an energy and resource efficient way;*
5. *Accelerating the shift to sustainable and smart mobility;*
6. *From 'Farm to Fork': designing a fair, healthy and environmentally-friendly food system;*
7. *Preserving and restoring ecosystems and biodiversity;*
8. *A zero pollution ambition for a toxic-free environment.*

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1. In the EGD, the notion 'green transition' refers to the aim of combining the achievement of climate neutrality and a high level of environmental sustainability with economic growth and competitiveness. More specifically, the green transition '[refers to] the transition of the Union economy and society towards the achievement of the climate and environmental objectives primarily through policies and investments, in accordance with the European Climate Law [...], the European Green Deal and international commitments [...]' (Council of the European Union 2022: art. 3(a)). The climate and environmental objectives of the EU, as laid down in Regulation (EU) 2020/852, are: climate change mitigation; climate change adaptation; the sustainable use and protection of water and marine resources; the transition to a circular economy; pollution prevention and control; and the protection and restoration of biodiversity and ecosystems (European Union 2020: art. 3b).

Additionally, we include in the analysis initiatives related to one of the broad areas that the EGD identifies as key to ensuring that sustainability is mainstreamed into EU policies:

9. *Pursuing green finance and investment and ensuring a just transition* <sup>(2)</sup>.

Our assessment of the extent to which and how the LNOB principle has been taken into account in the implementation of the EGD to date (or, in other words, of the 'just transition dimension' of the EGD implementation) considers both: i) the strategic level, meaning the *strategies* elaborated by the European Commission to achieve the objectives of the nine EGD macro-areas considered; and ii) the *instruments* deployed, i.e. specific legislative and non-legislative initiatives adopted by the European Union for the implementation of the EGD. This analysis allows us to identify a number of building blocks of what can be defined as an emerging EU framework for a just transition <sup>(3)</sup>: policy orientations, legislation and funding provided by the EU and aimed at ensuring that the EU and its Member States can make the most of the opportunities deriving from the green transition while addressing the related social challenges.

The second objective of this study is to identify *gaps and limitations* in the integration of the LNOB principle into implementation of the EGD (thus, the main gaps and limitations of the emerging EU just transition framework). This has been done by including in our analysis the main findings of relevant assessments and evaluations touching upon the just transition dimension of the EGD implementation, published by EU institutions and bodies, think tanks and stakeholder organisations, and academia.

Drawing on this, the third objective of this study is to formulate a set of *policy implications* for EU policy-makers in order to make sure that the objective of achieving a just transition leaving no one behind is fully and effectively integrated into EU policies.

This study is structured as follows. Section 1 discusses the analytical framework of the research and the methodological choices made. The two following sections focus on the just transition dimension of EGD-related strategies (Section 2) and implementation instruments (Section 3). Section 4 discusses the main gaps and limitations of the integration of the LNOB principle into the implementation of the EGD, to date. Section 5 concludes and presents some policy implications for EU policy-makers.

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2. In this analysis, we do not include the global dimension of EU just transition initiatives. This (key) dimension cannot be fully captured and analysed through our analytical framework and research methodology, which have been specifically elaborated for the EU context.
  3. Galgóczi (2018) proposed the expression 'EU just transition framework'.

## 1. Analytical framework and research methodology

### *1.1 The analytical framework: the European Green Deal, the just transition and the welfare state*

As framed in the EGD Communication, the LNOB principle can be considered as a cross-cutting principle, to be taken into account in the implementation of actions related to the whole EGD. Although the wording in the EGD Communication gives an idea of the scope of this principle – highlighting the need to ‘put people first, and pay attention to the regions, industries and workers who will face the greatest challenges’ (European Commission 2019a: 2) – few details are provided to explain the concrete implications of this principle and how it was intended to be implemented. Hence, to better outline the LNOB principle and to empirically explore how it has been integrated into the implementation of the EGD, more precise ‘coordinates’ are needed than those found in the EGD Communication.

In this respect, it is important to note that, in the EGD, the LNOB principle is intrinsically linked to the notion of ensuring a ‘just transition’. While no shared definitions of the latter notion exist (neither in academic nor in policy-making circles – cf. Cahill and Allen 2020; Galgóczi and Pochet 2022; Kalt 2022; Stevis et al. 2020), linking the LNOB principle to the academic debate on the just transition nevertheless makes it possible to identify two key variables for our empirical analysis: i) the scope of the LNOB principle (challenges addressed and groups/territories supported by just transition policies), in other words, the targets of just transition initiatives; and ii) (eco-) social policies <sup>(4)</sup> deployed to support the achievement of a just transition. Together with the transformative purpose of the actions envisaged, the scope of the just transition initiatives and concrete policies implemented can indeed be considered as key dimensions reflecting differing (institutional, societal, and academic) understandings of the notion of a just transition. In this study we do not rely on any existing definitions of the just transition: our objective is to identify empirically, through textual analysis, the EU understanding of this notion in the context of the implementation of the EGD, using the dimensions of targets and welfare functions performed by (eco-social) policies as the main reference points guiding us in this endeavour.

Regarding the first dimension, we have already highlighted that the EGD Communication explicitly mentions regions, industries and workers particularly vulnerable to the green transition. However, the Communication also refers, admittedly rather vaguely, to the European Pillar of Social Rights (EPSR) as the reference framework to ensure that ‘no one is left behind’ in the transition (European Commission 2019a: 4). This potentially broadens the scope of the beneficiaries of EU just transition policies, to include other types of vulnerabilities beyond those potentially affecting industries, regions and workers. Consequently, in the present study we will focus on if and how

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4. For a discussion on ‘eco-social policy mix’, cf. Mandelli (2022) and Petmesidou and Guillén (2022).

the various initiatives for implementing the EGD selected for the analysis include measures targeted at the following categories (*targets*):

- i) *Vulnerable territories;*
- ii) *Vulnerable businesses/sectors;*
- iii) *Vulnerable workers;*
- iv) *Other vulnerable citizens;*
- v) *People living in poverty;*
- vi) *The gender dimension;*

Regarding the second dimension, we started from reflections on the 'dimensions of justice' underpinning the notion of the just transition. The literature usually refers to no less than three such, often interdependent, dimensions (Newell and Mulvaney 2013; Goddard and Farrelly 2018; McCauley and Heffron 2018; Biermann and Kalfagianni 2020): i) distributive justice, concerning how the different impacts, burdens and benefits are distributed across the members of society; ii) procedural justice, defining, in relation to the decision-making process, how and by whom decisions are taken to define the problem, the approaches and solutions; and iii) restorative justice, considering how the damage suffered by the (most) affected groups and countries can be repaired <sup>(5)</sup>. Linking these three dimensions to welfare policies, Sabato et al. (2021; 2023) have identified four possible 'functions' of the welfare state in the green transition, which we will consider in this study:

- i) *Benchmarking function.* The principles and rights embedded in welfare states can contribute to policies for the green transition by defining social criteria and objectives to be considered and respected while designing and implementing these policies. This benchmarking function would include, for instance, policies ensuring the quality of 'green jobs', access of vulnerable households to measures enhancing the energy efficiency of residential buildings, consideration of the distributional consequences and the impact on the most vulnerable when designing environmentally friendlier fiscal systems.
- ii) *Enabling function.* Welfare policies can facilitate the achievement of the objectives of the green transition. They can do so firstly through social investment policies targeted at the provision of skills needed for a greener economic model or aimed at facilitating transitions of workers between economic sectors. Secondly, welfare policies can also contribute directly to the green transition if these policies (and the related social infrastructure) are purposely designed to reduce the ecological footprint of the welfare state, for instance through carbon-neutral services.

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5. The European Environmental Agency (EEA 2024) refers to distributional justice, procedural justice, recognitional justice, and restorative justice.

- iii) *Buffering function.* Social protection and assistance policies providing income protection (e.g. unemployment and minimum income schemes, pensions, healthcare) can act as buffers, ensuring that all citizens are protected and/or compensated during the green transition, and tackling any transition-related increases in inequalities.
- iv) *Consensus building/conflict management function.* Welfare state institutions could be used to build a consensus on the green transition or to manage the associated conflicts. Both social dialogue structures and broader instances of civil dialogue could be used for these purposes.

### ***1.2 Research methodology: exploring the just transition dimension of the implementation of the EGD***

The core sections of this study are based on a qualitative textual analysis of policy documents related to 'strategies' elaborated soon after the publication of the EGD (section 2) and to key legislative and non-legislative initiatives ('instruments') implementing the EGD (section 3).

In order to identify documents to be included in the section on strategies (and to attribute them to specific macro-areas) our starting point has been an analysis of the 2019 EGD Communication (European Commission 2019a) and of its Roadmap (European Commission 2019b), which first reflected the intention to publish a series of strategic documents linked to specific macro-areas for action <sup>(6)</sup>. Our final sample consists of 21 'strategic documents', almost exclusively Commission Communications published in 2020 and 2021 (cf. Table 1, Annex 1) <sup>(7)</sup>.

The process of selecting 'instruments' to be included in our sample combined authors' knowledge of the field and a pre-scan of initiatives implementing the EGD, with advice from external experts. In more detail, we first identified initiatives that EU institutions consider as related to the implementation of the EGD, by cross-checking the Council and Commission's webpages on the EGD with the European Parliament's 'Legislative Train Schedule' webpage (Section 'European Green Deal') <sup>(8)</sup>. This search resulted in more than 120 initiatives: reading the descriptions of these initiatives on the institutions' webpages gave us a preliminary idea about which initiatives would potentially have a just transition dimension. Second, we contacted 10 experts in EU policies

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6. Although each strategic document has been attributed to a single macro-area, it is important to consider that these documents may contribute to several macro-areas. This is in line with the spirit of the EGD Communication, which specifies that the EGD areas for action are meant to be 'strongly interlinked and mutually reinforcing' (European Commission 2019a: 4).

7. Full references to these documents are provided in Table 1- Annex 1 and in the References section. In the main text of the study, we provide references only when we use direct quotes from these documents.

8. Respectively, Council of the European Union (n.d.), European Commission (n.d.), and European Parliament (n.d.).

related to the socio-ecological transition (including experts from academia, research institutes and think tanks, and NGOs), asking them to indicate – for each of the 9 macro-areas of this study – a maximum of two EU initiatives *adopted* between January 2020 and November 2023 which they deemed particularly relevant or potentially relevant to the just transition. Combining information emerging from the preliminary analysis on institutions' websites, external experts' indications, and our own knowledge of the topic, we selected a sample of 14 initiatives adopted between February 2021 and October 2023 (Table 5, Annex 1). Given the criteria used for our pre-scan and the guidelines provided to the external experts (i.e. to indicate 'initiatives *particularly relevant* or *potentially relevant* to the just transition') and the objective of this research (to understand how the just transition notion features in the implementation of the EGD), these instruments represent 'most likely cases', i.e. initiatives in which it is far more likely that just transition-related objectives and themes appear than in the whole set of initiatives implementing the EGD. For each of these 14 initiatives, we have identified and analysed their 'constitutive documents'. These documents (17 in total) are (Table 5, Annex 1) <sup>(9)</sup>: EU Regulations (6), Directives (3), Council Recommendations (1), Commission Recommendations (1), Commission Communications, Staff Working Documents and Guidance documents (6).

The research team performed a qualitative textual analysis of documents related to both strategies and instruments, looking for instances in which green transition objectives, concerns or policies and social objectives, concerns, or policies are addressed simultaneously (explicitly or implicitly). For each document, summary fiches were drafted summarising information related to the key dimensions of the analysis, namely: i) the importance of the notion of a just transition (i.e. the extent to which the green and social dimensions are treated simultaneously); ii) the main targets to which the just transition has been related; and iii) welfare state functions touched upon. The main findings of this analysis – discussed in Sections 2 and 3 – are illustrated in graph form in Tables 2,3,4,6,7, and 8 in Annex 1, using black dots (when a dimension is more present in the documents referring to a strategy or instrument) and white dots (when a dimension is less present).

The last part of this study, on 'Gaps and Limitations' (section 4), is based on the results of our own analysis, as well as the main findings of several assessments / evaluations touching upon the just transition dimension of the EGD implementation.

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9. Full references to these documents are provided in Table 5 - Annex 1 and in the References section. In the main text of the study, we provide references only when we use direct quotes from these documents.

## 2. The just transition dimension of EGD-related strategies

### 2.1 General considerations

In the 'strategic' documents included in this analysis (Table 1, Annex 1), the *importance* attributed to the objective of achieving a just transition varies across the 9 EGD macro-areas for action.

Just transition-related topics play a relatively important role (with nuances from area to area) in the strategic documents linked to 6 macro-areas (Table 2, Annex 1): '1. Increasing the EU's climate ambition for 2030 and 2050'; '2. Supplying clean, affordable and secure energy'; '4. Building and renovating in an energy and resource efficient way'; '5. Accelerating the shift to sustainable and smart mobility'; '6. From 'Farm to Fork': designing a fair, healthy and environmentally-friendly food system'; and '9. Pursuing green finance and investment and ensuring a just transition'. This objective, however, appears relatively marginal in the remaining 3 macro-areas: '3. Mobilising industry for a clean and circular economy'; '7. Preserving and restoring ecosystems and biodiversity'; and '8. A zero pollution ambition for a toxic-free environment'.

Within macro-areas, the importance given to the just transition varies across documents / specific components of each macro-area. In macro-area '2. Supplying clean, affordable and secure energy', for example, the objective of a just transition appears (relatively) marginal in most of the related strategic documents (the EU strategy for energy system integration, the hydrogen strategy, and the EU strategy to reduce methane emissions), with the notable exception of the 2020 Commission Recommendation on energy poverty. Similarly, in macro-area '9. Pursuing green finance and investment and ensuring a just transition', the objective of achieving a just transition is quite strongly included in the 'Sustainable Europe Investment Plan', while it is almost absent from the 'Sustainable Finance strategy'. Interestingly enough, while this objective is certainly central to the Commission Communication on 'A strong Social Europe for just transitions', it is addressed in a rather generic and vague way in the text of the Communication, which provides only a few specific examples of linkages between green transition and social policies.

In those macro-areas where the just transition is more significant, the extent to which this objective is integrated into the overall strategies differs. For instance, just transition-related objectives and concerns feature in both the 'Renovation Wave strategy' and the 'Sustainable and Smart Mobility strategy'. However, while these objectives and concerns appear fairly mainstreamed across the various actions and priorities of the 'Renovation Wave strategy', the just transition is not fully integrated into the various elements of the 'Sustainable and Smart Mobility strategy'. In the latter, the just transition is a specific Flagship of the strategy but is barely touched upon in the other 9 Flagships making up the strategy.

## 2.2 Vulnerabilities targeted

When it comes to the *main targets* of just-transition related initiatives/concerns identified in the strategic documents, our analytical framework focuses on the notion of ‘vulnerabilities’. On the one hand, this is a relative notion, open to multiple interpretations, and, on the other hand, vulnerabilities may be area-specific.

This premised, it emerges from our analysis (Table 3, Annex 1) that references to all the categories of vulnerabilities identified in our analytical framework have been detected in the documents analysed, although the emphasis on each category varies within and across the macro-areas. In particular, it emerges that a more limited number of vulnerable categories have been addressed in macro-areas ‘7. Preserving and restoring ecosystems and biodiversity’ and ‘8. A zero pollution ambition for a toxic-free environment’.

In general, for the various categories of vulnerability considered (and taking the 9 macro-areas together), it emerges that more emphasis has been placed on: i) vulnerable workers, ii) vulnerable businesses/sectors, and iii) vulnerable territories. There seems to have been a lesser focus on people living in poverty (with the important exception of individuals and households in a situation of energy poverty) and on the gender dimension. References to other vulnerable categories of citizens also emerge from the textual analysis. However, these are rather heterogeneous categories (see below).

Considering in more detail the first three targets of just transition-related provisions in our sample of strategic documents (vulnerable workers, vulnerable businesses/sectors, and vulnerable territories), one can note that, first, the specific targets differ to some extent across macro-areas, and, second, that these three categories are often linked within the macro-areas. One example of this linkage are references to the need to support territories relying on carbon-intensive industries, usually implying the need to support those industries and their workers. Importantly, the emphasis on regions relying on carbon-intensive and energy-intensive industries features strongly among the just transition-related concerns and objectives in our sample and across the macro-areas. This may be due to mentions of the Just Transition Fund (JTF) as an important instrument to ensure a just transition in virtually all the strategic documents analysed across the 9 macro-areas.

Regarding ‘*vulnerable territories*’, besides the emphasis on regions relying on carbon-intensive and energy-intensive industries (especially in macro-areas 1, 2, 3, and 9), references can be found to remote regions and islands (macro-areas 1, 3, 4, 5, and 6), and to rural areas (especially macro-areas 1, 4, 5, 6, and 9). Most references to ‘*vulnerable businesses/sectors*’ concern economic sectors that rely on carbon-intensive and energy-intensive processes (e.g. in macro-areas 1, 2, 3, and 9), agriculture – sometimes with a focus on small-scale farmers – (e.g. macro-areas 1, 2, and 6), and, in a few cases, vulnerable small and medium enterprises (e.g. macro-areas 4 and 9). The



vulnerabilities of *'vulnerable workers'* – usually, but not exclusively, in the sectors mentioned beforehand – often relate to: i) the risk of becoming unemployed and employability prospects; and ii) working conditions (e.g. precarious or undeclared workers).

Explicit references to *'people living in poverty'* mostly concern individuals and households experiencing energy poverty, referred to in several macro-areas (especially macro-areas 1, 2, 4, and 9). References to the *gender dimension* are scarcer and often generic (e.g. in macro-areas 3, 4, 5, and 6), in many cases pointing to the need to increase women's employment in specific sectors important to the green transition (such as, for instance, science, technology, engineering and mathematics, the construction sector, the transport sector, and organic farming).

As mentioned above, a number of *other vulnerable categories of citizens* have been mentioned in some of the documents analysed, often in relation to specific macro-areas. These include individuals and households on a low or medium income (e.g. in macro-areas 1, 2, 4, 5, and 6), persons with disabilities (e.g. macro-areas 1, 4, 5, and 8), and vulnerable consumers (e.g. macro-areas 2 and 6).

### **2.3 Welfare state functions**

Regarding the *functions of the welfare state* in the green transition, the strategic documents analysed mostly refer to policies and measures related to the benchmarking and enabling functions (Table 4, Annex 1). Some references relevant to the consensus building/conflict management function also emerge, in a cross-cutting way, in the 9 macro-areas: however, these examples are often just mentioned briefly. References relevant to the buffering function (i.e. on the role of the social protection and social inclusion schemes described in the analytical framework) are much less frequent and sometimes implicit.

Although some references to social objectives and policies relating to the 4 functions of the welfare state can be found in all the 9 macro-areas included in this study, in a few macro-areas these references appear less developed. This is especially true of macro-areas '7. Preserving and restoring ecosystems and biodiversity' and '8. A zero pollution ambition for a toxic-free environment', and, in part, of macro-areas '2. Supplying clean, affordable and secure energy' and '6. From 'Farm to Fork': designing a fair, healthy and environmentally-friendly food system'.

Regarding the *benchmarking function*, in many cases the strategic documents analysed refer broadly to the European Pillar of Social Rights and to its 20 principles as a policy framework or a compass to ensure that the green transition is socially just. More specific examples in the documents referring to welfare policies as a benchmark for a socially just green transition concern: job quality (e.g. setting minimum standards for working conditions, a focus on occupational health and safety in sectors such as transport, construction and agriculture); initiatives targeting

vulnerable groups (e.g. prioritising low-income households when allocating public funds, ensuring access to essential energy services for vulnerable groups, providing renovation incentives to lower-income households, investment to provide affordable solutions to those affected by carbon pricing policies); and the need to ensure adequate living standards for some categories (e.g. ensuring fairer economic returns for sustainable practices in agriculture and providing support for organic farmers).

As for the *enabling function* of the welfare state, initiatives and priorities highlighted in all the macro-areas relate to the need to enhance education, training, and skills policies in order to ensure workers' employability in a greener economic landscape (hence, a *social investment/activation orientation*). There are also a few references to '*greening*' *social infrastructure* to make it more energy-efficient (in particular, schools, hospitals, and healthcare facilities), especially in macro-area '4. Building and renovating in an energy and resource efficient way'.

Regarding the *consensus building/conflict management* function, the role of social dialogue and/or of civil dialogue is mentioned in all the macro-areas. In some cases, however, references to stakeholders' participation are limited to specific initiatives (for instance, in specific 'platforms' foreseen by some of these strategies) or policies (for instance, the involvement of the social partners in defining and implementing measures for training / re- and upskilling of workers). In macro-area '4. Building and renovating in an energy and resource efficient way', there seems to be slightly more emphasis on the role of civil dialogue and participation than in other macro-areas, with references to initiatives such as energy communities, the need to develop a participatory and neighbourhood- based approach to renovation, and to the New European Bauhaus.

References to the *buffering function*, as mentioned above, are less frequent and often implicit, including in the 2020 Communication on 'A strong social Europe for Just Transitions'.

While the analysis presented above gives an idea of how the just transition was originally framed in the Commission's strategies drafted soon after the publication of the EGD, a number of clarifications need to be made. Firstly, the documents analysed in this section are strategic, programmatic documents, which often refer to future initiatives. In this respect, instruments particularly relevant to the just transition mentioned across (most of) the 9 macro-areas are: i) the Just Transition Fund; ii) the Pact for Skills, and iii) the Modernisation Fund, while implementation through the European Semester has been particularly emphasised in documents related to macro-area '9. Pursuing green finance and investment and ensuring a just transition'. Second, while an analysis of these strategic documents published between 2020 and 2021 allows us to understand the original idea of a just transition in the EGD and in its macro-areas, the implementation of the EGD has been impacted, *inter alia*, by a number of exogenous factors such as the COVID-19

pandemic, the Russian aggression against Ukraine, and, more in general, growing geopolitical tensions. Hence, it is necessary to analyse the actual policy instruments implementing the EGD and particularly relevant to the objective of achieving a just transition that leaves no one behind in order to assess if and how original promises were kept, identifying gaps and limitations.

### 3. The just transition dimension of EGD-related instruments

#### 3.1 General considerations

The final sample of 'instruments' selected for this analysis is made up of 14 initiatives adopted between February 2021 and October 2023 (Table 5, Annex 1). Most of these initiatives are expected to contribute to the achievement of several EGD macro-areas, although to varying extents. Hence, attributing an instrument to one or more specific macro-areas is a complex exercise, entailing the risk of a certain arbitrariness. This said, the macro-areas that seem to emerge most frequently in our sample of instruments are macro-area '1. Increasing the EU's climate ambition for 2030 and 2040' and macro-area '2. Supplying clean, affordable and secure energy'. This is hardly surprising, for three reasons. First, macro-area 1 on climate ambitions is transversal: instruments relating to other macro-areas often also address this macro-area, as they are designed to contribute to the achievement of the EU's climate objectives. Second, no less than 5 instruments in our sample are part of the 'Fit for 55' package: since this package implements the EU Climate Law, these instruments can be linked to macro-area 1. Third, issues related to energy, already important in the 2019 EGD Communication, have become even more significant due to the energy crisis resulting from Russia's invasion of Ukraine. Conversely, macro-areas '6. From 'Farm to Fork': designing a fair, healthy and environmentally-friendly food system', '7. Preserving and restoring ecosystems and biodiversity', and '8. A zero pollution ambition for a toxic-free environment' are underrepresented in our sample of instruments. While this may be partly due to our selection criteria and procedures, in the cases of macro-areas 7 and 8 this is also probably because, from the outset, just transition-related objectives and concerns were less highlighted in the strategies related to these macro-areas (see Section 2). Furthermore, implementation of measures particularly relevant to these EGD macro-areas seems to be lagging behind, and few initiatives potentially relevant to the just transition have been adopted (see section 4). This is, importantly, true for macro-area 6 on 'From Farm to Fork'.

In terms of *importance*, the just transition is a *central notion* in 6 of the instruments in our sample (Table 6, Annex 1). Of these, two have a more focussed scope, concerning specific aspects of the just transition: energy poverty (the 2023 Commission Recommendation on energy poverty) and skills policies (the Pact for Skills). Four instruments have a somehow broader scope: the Just Transition Fund, the 2022 Council Recommendation on ensuring a fair transition towards climate neutrality (hereafter, 'the 2022 Council Recommendation on a fair transition'), the Social Climate

Fund (SCF), and the Modernisation Fund (as 'enhanced' following the 2023 reform of the Emission trading system (ETS) Regulation). Three of these instruments are non-binding initiatives: the 2023 Commission Recommendation on energy poverty, the Pact for Skills, and the 2022 Council Recommendation on a fair transition. Importantly, only 3 of these instruments allocate explicitly earmarked funding to just transition policies: the JTF, the SCF, and, in part, the Modernisation Fund (Table 6, Annex 1).

In the remaining 8 instruments, the just transition is *one element (among others)* touched upon in the related policy documents (Table 6, Annex 1). Our textual analysis shows that the just transition emerges as a relatively important element in 4 of these instruments, although to a varying degree: the European Climate Law, the Commission Guidance on the update of the National Energy and Climate plans (NECPs), the Regulation on the REPower EU chapters of the national Recovery and Resilience Plans (RRPs), and the revised Energy Efficiency Directive (EED). Conversely, just transition-related topics are less highlighted in: the Regulation on the Recovery and Resilience Facility (RRF), where the just transition appears as a 'secondary objective'; the Commission Communication on the Green Deal Industrial Plan (GDIP), which has a narrow focus on workers' skills, especially from the perspective of skills' shortage; the revised Regulation on land use, land use change and forestry (LULUCF), where achieving a just transition is merely mentioned as an objective, with the Commission undertaking to provide guidelines and assess their implementation; and the revised Renewable Energy Directive (RED). Of these 8 instruments, only two allocate funding that Member States *may* decide to use for just transition policies: the RRF and the Regulation on the REPower EU chapters of the RRs.

Thus, in terms of *resources made available*, only 5 out of 14 instruments in our sample provide *funding* for just transition-related measures or which could be potentially used by the Member States to implement just transition-related measures (Table 6, Annex 1). The two main financial instruments which provide *earmarked* funding to the just transition are the JTF (endowed with €17.5 billion (2018 prices) for the period 2021–2027) and the SCF (expected to provide about €86.7 billion for the period 2027-2032). Regarding *potential* funding, an example is the Regulation on the REPower EU chapters in the RRs, in which 'addressing energy poverty' is one of the objectives to which the REPowerEU chapters *may* contribute.

In most cases, however, besides stating the objective of achieving a just transition and the principle of leaving no one behind, the instruments in our sample provide *recommendations and guidelines* to the Member States. These recommendations/guidelines can be more or less detailed. While in some cases these recommendations concern specific just transition-related topics/themes (for instance, the 2023 Commission Recommendation on energy poverty), in other cases they aim to be more comprehensive, as in the case of the 2022 Council Recommendation on a fair transition. The latter indeed calls on the Member States to adopt and implement 'comprehensive

and coherent policy packages, addressing the employment and social aspects to promote a fair transition across all policies, notably climate, energy and environmental policies, as well as to make optimal use of public and private funding' (Council of the European Union, 2022: art. 2), and provides examples of measures that could be part of these policy packages. Another example of EU recommendations and guidelines on the just transition are the Commission Guidelines on the update of the NECPs, which call on the Member States to strengthen planning to ensure a fair and just transition, and to fully take into consideration the 2022 Council Recommendation on a fair transition. Similarly, in the revised LULUCF Regulation, an initiative whose just transition dimension has been assessed as rather marginal, the Commission undertakes to issue guidance to support the Member States in ensuring a just and socially fair transition for all in the implementation of the Regulation <sup>(10)</sup>.

### **3.2 Vulnerabilities targeted**

When it comes to the *main targets* of just transition-related objectives, concerns, and measures included in the selected instruments, it emerges from our analysis that the vulnerabilities to be addressed are sometimes expressed rather vaguely. This is, for instance, the case of the Regulation on the European Climate Law, which – while paying a fair amount of attention to the objective of achieving a just transition – usually identifies targets in a generic manner, resorting to language such as 'Ecosystems, people and economies in all regions of the Union will face major impacts from climate change' or 'the most vulnerable and impacted populations'. This circumstance may be due to the type of documents analysed (i.e. the constitutive legislation of each instrument): more precise targeting could be expected in implementing acts. However, it could also indicate shortcomings and gaps in definitional aspects and measurements.

Focusing on the six categories identified in Section 1 (Table 7, Annex 1), it emerges that, in terms of *vulnerable territories*, the JTF and the ETS Modernisation Fund have a more marked territorial focus. The former aims to reduce the risk of transition-enhanced regional disparities in those regions that rely heavily on fossil fuels for energy or greenhouse gas intensive industries. The scope of the JTF was then broadened, and Member States' Territorial Just Transition Plans (TJTTPs) actually include more territories and sectors than originally proposed by the European Commission (e.g. territories relying on the automotive industry). As for the Modernisation Fund, besides its overall target (to support EU countries with a Gross domestic product (GDP) per capita below 75% of the EU average), 'support to a just transition in carbon-dependent regions' is among the priority investments of the Fund, while measures 'supporting low-income households to address energy poverty and to modernise their heating systems' are expected to include investments in rural and

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10. Additionally, the Commission pledges to include 'an assessment of social and labour impacts, including on gender equality and working conditions' (European Union 2023b: art. 17.2 (d)) in the planned report to the European Parliament and the Council on the operation of the LULUCF Regulation.

remote areas. Importantly, both the JTF and the Modernisation Fund directly provide funding to implement measures in these vulnerable territories, including to support businesses and workers.

Besides these two instruments with a precisely defined territorial dimension, other territories often mentioned as particularly vulnerable in the green transition in documents related to our whole sample of instruments are: rural or remote areas; outermost regions and islands; and low-income regions. This said, first, while recognising these territorial vulnerabilities, most of these EU initiatives do not provide specific funding to support those territories (with the exceptions of the JTF and of the Modernisation Fund). Second, in many cases, these vulnerabilities are recognised in relation to specific issues, such as energy efficiency, mobility, and transport challenges. For instance, the revised Energy Efficiency Directive invites the Member States to adopt measures to improve energy efficiency for people living in rural and remote areas and in the outermost regions, and to improve connectivity in rural and remote areas. In its Guidance on the update of the NECPs, the Commission invites the Member States to pay special attention when developing energy communities to vulnerable groups and consumers living in rural and remote areas.

Regarding *vulnerable businesses / sectors*, micro enterprises and small and medium enterprises (SMEs) are recognised as particularly vulnerable to the challenges of the green transition, especially in the energy transition. Explicit references to the need to support these enterprises can be found in most of the instruments analysed, including in those providing funding. Hence, support from the SCF, for instance, can target micro-enterprises that are vulnerable and particularly affected by the inclusion of greenhouse gas emissions from buildings and road transport, while the JTF is expected to focus on micro-enterprises and SMEs. The support to be provided often includes measures to improve energy efficiency of those enterprises (e.g. JTF, SCF, Regulation on the RePowerEU chapters in the RRP).

*Workers* and jobseekers living in the territories listed above or working in the sectors more exposed to the consequences of the green transition are identified as a particularly vulnerable category in EU just transition initiatives. Their vulnerability is mainly framed in terms of risk of losing their jobs or low employability in a 'greener' economy, so there is a major focus on measures for training, re-skilling and up-skilling the workforce (see also Section 3.3). References to other types of vulnerabilities, such as those related to job quality and occupational health and safety, are present but less frequent. In some of the documents analysed there are references to specific categories of workers considered as particularly vulnerable to the green transition, such as older workers, adults struggling with basic skills, and low-skilled workers (e.g. in the Pact for Skills and in the 2022 Council Recommendation on a fair transition), workers with disabilities (e.g. Regulation on the Just Transition Fund, 2022 Council Recommendation on a fair transition), young people neither in employment nor in education or training (NEETs) (e.g. 2022 Council

Recommendation on a fair transition), the self-employed (e.g. 2022 Council Recommendation on a fair transition).

Besides employment status, most references to *other vulnerable categories of citizens* in our sample of instruments concern low and lower-middle income households (with increasing emphasis on lower-middle income households), vulnerable consumers, and vulnerable transport users. These references – present across the sample of documents analysed – primarily refer to vulnerabilities related to access to energy and energy affordability, including concerns due to rising energy prices following Russia’s invasion of Ukraine.

When it comes to *people living in poverty* (based on a broad definition of poverty), references found in most of the instruments analysed are related to individuals and households experiencing energy poverty (or at risk of energy poverty). Some of the instruments included in our sample directly provide funding that can be used to address this issue: the RRF, the JTF, the enhanced Modernisation Fund, and, especially, the SCF and the Regulation on the REPowerEU chapters in the RRP. Other instruments highlighting energy poverty as a key concern are the 2023 Commission Recommendation on energy poverty and the revised Energy Efficiency Directive. Some emphasis on transport poverty is more recent: this issue has been in particular addressed by the 2022 Council Recommendation on a fair transition and by the SCF.

When it comes to the *gender dimension*, references are apparent in almost all the instruments analysed, although these are often generic: in most cases, the promotion of gender equality and equal opportunities is simply presented as an objective. In some cases, this objective is expected to be mainstreamed in Member States’ plans (e.g. in the national Recovery and Resilience Plans, in the national Social Climate Plans, in implementing the 2022 Council Recommendation on a fair transition). More specific references are made to: i) women as a group particularly at risk of energy poverty, in particular single parents and older women (e.g. revision of the Energy Efficiency Directive, 2023 Commission Recommendation on energy poverty); and ii) women’s participation in the labour market and in education, training, re-and up-skilling initiatives in the context of the green transition (e.g. JTF, Green Deal Industrial Plan, Pact for Skills).

Overall, it emerges from our analysis that, in terms of targets, while the various instruments analysed highlight a variety of vulnerabilities, there is an *emphasis on specific territories/sectors and issues* (including in terms of EU funding), notably regions that rely heavily on fossil fuels for energy or greenhouse gas intensive industries, vulnerabilities related to energy and transport, the need to re-skill and up-skill the workforce. Furthermore, vulnerabilities addressed by just transition-related objectives, concerns and measures in the instruments included in this analysis are often defined vaguely. In this respect, however, progress can be detected. First, EU-wide

definitions of energy poverty (Regulation on the Social Climate Fund and revised EED) <sup>(11)</sup> and of transport poverty (2022 Council Recommendation on a fair transition and Regulation on the Social Climate Fund) <sup>(12)</sup> are now available, while the revised EED identifies a range of categories classified as 'vulnerable customers' (including final users, low- and medium-income households, and people living in social housing), and groups more at risk of being affected by energy poverty or who are more susceptible to the adverse impacts of energy poverty (such as women, people with disabilities, older people, children, and people with a minority racial or ethnic background).

Second, the 2022 Council Recommendation on a fair transition seeks to define better the notion of vulnerabilities in the green transition, referring to 'people and households most affected by the green transition' as 'those [people and households] whose effective access to quality employment, including self-employment, and/or to education and training and/or to a decent standard of living and essential services is significantly limited or at risk of being significantly limited as a direct or indirect consequence of the green transition' (Council of the European Union 2022: art. 3c). In this context, particular attention should be paid to people and households in vulnerable situations, meaning 'those who, independently of the green transition, face or are at risk of facing a situation of limited access to quality employment, including self-employment, and/or to education and training and/or to a decent standard of living and essential services, implying low capacities to adapt to the consequences of the green transition' (Council of the European Union 2022: art. 3d).

### **3.3 Welfare state functions**

Among the four functions of the welfare state in the green transition identified in this study (Table 8, Annex 1), the *benchmarking function* appears fairly well developed in the instruments analysed. First, this function is mostly expressed at a general level, through references to the EPSR as an overarching framework to ensure that the transition is socially fair. This role of a reference framework for the just transition is however also increasingly played by the 2022 Council Recommendation on ensuring a fair transition towards climate neutrality, which is often a key reference for just transition policies in EU initiatives (e.g. in the LULUCF Regulation, the Commission Guidance on the update of NECPs, and the Regulation on the Social Climate Fund). Besides general social policy frameworks, as shown in the previous section, references to more specific welfare state principles to be respected in implementing green transition policies include: job quality, occupational health and safety, and gender equality. Second, in some cases, EU

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11. In the EU Regulation establishing the SCF, energy poverty refers to a '[...] 'household's lack of access to essential energy services that underpin a decent standard of living and health, including adequate warmth, cooling, lighting, and energy to power appliances, in the relevant national context, existing social policy and other relevant policies' (European Union 2023d: art. 2 (1)).

12. In the EU Regulation establishing the SCF, transport poverty refers to '[...] individuals' and households' inability or difficulty to meet the costs of private or public transport, or their lack of or limited access to transport needed for their access to essential socioeconomic services and activities, taking into account the national and spatial context' (European Union 2023d: art. 1 (2)).



initiatives included in our sample contain recommendations to the Member States to identify and measure the social and employment consequences (and distributional impact) of green transition policies (e.g. in the Commission Guidance on the update of NECPs, the Regulation on the Recovery and Resilience Facility). Third, the most widespread example of the 'benchmarking' function is the recommendation to the Member States to prioritise measures supporting the most vulnerable groups of the population in the design and implementation of (some) policies for the green transition. As shown in Section 3.2, for example, the 2022 Council Recommendation on a fair transition highlights the need to pay particular attention to people and households who are in vulnerable situations independently of the green transition. More specific recommendations in this respect emerge in relation to energy poverty. The revised Energy Efficiency Directive, for instance, in the context of the 'energy efficiency first' principle, invites the Member States to prioritise measures improving the situation of people facing or risking energy poverty or vulnerable customers <sup>(13)</sup>. Furthermore, the Directive invites the Member States to 'ensure that the competent authorities take actions to mitigate significant negative direct or indirect impacts of energy efficiency measures on energy poor, low-income households or vulnerable groups when designing and implementing energy efficiency measures' (European Union 2023e: art. 5.6). Similar references to prioritising these groups in initiatives to improve the energy efficiency of residential buildings can be found in a number of EU instruments (some of which directly provide funding), such as the Commission Guidance on the update of NECPs, the Regulation on the RRF, the JTF, the SCF, the Regulation on the REPowerEU chapters in the national RRP, the 2022 Council Recommendation on a fair transition, the 2023 Commission Recommendation on energy poverty, and the revised Renewable Energy Directive. In the Commission Guidance on the update of NECPs, the Regulation on the Social Climate Fund, and the 2022 Council Recommendation on a fair transition, issues related to transport poverty, such as prioritising improved access to zero-or-low emission mobility for the most vulnerable, are also highlighted.

When it comes to the *enabling function* of the welfare state, a *social investment/activation interpretation* of this function is apparent in the vast majority of the instruments analysed (Table 8, Annex 1). Most of them indeed highlight the importance of measures for up-skilling and re-skilling the workforce, to make sure that the skills required for the green transition are available. This approach is particularly evident in the Commission Communication on the Green Deal Industrial Plan: besides some references to job quality and gender equality, the just transition dimension of this document basically consists of its 'pillar' on 'Enhancing skills' (following a skills-first approach), mostly from a perspective of addressing skills shortages. Instruments such as the Commission Guidance on the update of the NECPs, the Regulation on the REPowerEU chapters in the national RRP, and, especially, the Pact for Skills and the 2022 Council Recommendation on a

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13. 'Energy efficiency measures should be implemented as a priority to improve the situations of those individuals and households and to alleviate energy poverty, and should not encourage any disproportionate increase in housing, mobility or energy costs' (European Union 2023e: (23)).

fair transition, list a broad array of education and training, skills development, and active labour market policies.

Still concerning the enabling function, but from the perspective of *'greening the welfare state'*, some EU instruments explicitly highlight the need for 'greening social infrastructure', i.e. improving energy efficiency of welfare infrastructure and reducing its emissions. This is the case, in particular, in the revised Energy Efficiency Directive, although references to relevant measures can also be found in documents related to the RRF (in relation to social housing and public buildings such as schools and hospitals), in the Commission Guidance on the update of NECPs (social housing), the Regulation on the Just Transition Fund (social housing), the 2022 Council Recommendation on a fair transition (social housing), and the Regulation on the Social Climate Fund (social housing). The case of the revised Energy Efficiency Directive appears particularly interesting in this respect, since the Directive refers to the 'exemplary role of the public sector' in promoting energy efficiency, meaning that 'public bodies' are expected to undertake renovations of their buildings to improve energy efficiency, including healthcare, education, and social services. The revised Renewable Energy Directive recalls the notion of the exemplary role of the public sector.

In terms of the *consensus building / conflict management function*, references to the important role to be played by stakeholders and citizens are quite widespread in the instruments included in this analysis. There are references to both *social dialogue* and *civil dialogue/citizens' participation*, whose important role in achieving a socially just green transition is highlighted as a key objective in most of the documents analysed. Besides stating stakeholders' and citizens' participation as general objectives, many of these instruments foresee the establishment of specific fora/procedures for social or civil dialogue on green transition-related issues at both the EU and national level. Examples include: the European Climate Law, foreseeing public consultations and multilevel climate and energy dialogue in the Member States, and sectoral roadmaps to be defined involving the social partners, including through the European Climate Pact; the Pact for Skills, which specifies the establishment of roundtables with industrial ecosystems and high-level roundtables with representatives of industrial ecosystems; the Communication on the Green Deal Industrial Plan, which envisages the setting up of specific platforms or forums for stakeholders' involvement, especially in relation to skills development; the revised Energy Efficiency Directive and the Renewable Energy Directive, foreseeing various measures to ensure social dialogue, civil dialogue and citizens' involvement (including in the most vulnerable communities). Importantly, the constitutive plans of two key instruments specifically devoted to (and providing funding for) the just transition are expected to be defined and implemented through social dialogue and the involvement of key stakeholders: the JTF's Territorial Just Transition Plans and the SCF's Social Climate Plans.

Finally, the *buffering function* of the welfare state in the green transition (i.e. social protection and inclusion benefits such as minimum income schemes, unemployment benefits, pensions, healthcare) is the least developed function within the sample of instruments analysed (Table 8, Annex 1). The SCF is the only EU instrument that provides funding for this function, since it foresees the provision of direct income support to vulnerable households and vulnerable transport users to reduce the impact of the increase in road transport and heating fuel prices. The 2023 Commission Recommendation on Energy Poverty focuses on structural measures to address energy poverty (such as incentives for energy efficiency renovations for vulnerable groups) but also states that the Member States ‘may accompany such structural measures with well-targeted measures to improve affordability of energy, such as targeted income support and social tariffs, or to temporarily support households affected by energy poverty’ (European Commission 2023c: art. 6). Importantly, the 2022 Council Recommendation on a fair transition includes a broader reflection on the need ‘to review and, where applicable, adapt social protection systems, including social inclusion policies, in view of the employment, social and health challenges posed by the green transition’ (Council of the European Union 2022: art. 6b), as a part of the comprehensive policy packages that the Member States are expected to adopt and implement. More concretely, the 2022 Council Recommendation highlights the need to (ibid.: art. 6b and 6c):

- adapt the provision of adequate income security, including through innovative job-to-job transition schemes, unemployment benefits and minimum income systems adapted to the needs arising from the green transition;
- ensure the provision of good quality, affordable and accessible social, health and long-term care services, especially to people and households most affected by the green transition; and
- provide targeted and temporary direct income support, notably to people and households in vulnerable situations, to mitigate adverse income and price developments.

Recalling the 2022 Council Recommendation on a fair transition, the Commission Guidance on the update of the NECPs includes among the ‘Key fair transition policies and measures for updated NECPs’ the need to ensure fair tax-benefit systems and social protection to support the most affected people and households, in particular those in vulnerable situations.

## 4. The EU framework for a just transition: gaps and limitations

Drawing on the findings from our analysis of EGD-related strategies (section 2) and instruments (section 3), and combining them with the results of key assessments/evaluations conducted by EU institutions and bodies, think tanks and academia, and NGOs, we identify a number of gaps and limitations in the integration of the just transition objective into the implementation of the EGD. More specifically, the gaps and limitations of the current EU framework for a just transition relate to its: i) scope; ii) mainstreaming and coherence; iii) comprehensiveness and integration; iv) knowledge basis; v) funding; vi) stakeholder involvement; vii) 'bindingness' on Member States and EU monitoring; and viii) level of ambition. 11 policy implications related to these topics are proposed in Section 5, with a view to enhancing the role of the just transition in the future implementation of the European Green Deal and in EU policies in general.

### 4.1 Scope

Integration of the just transition dimension into the implementation of the EGD has, to date, been uneven and incomplete. The European Scientific Advisory Board on Climate Change (ESABCC), for instance, points out that few EU climate policies recognise the variety of socioeconomic impacts that these policies are likely to entail (e.g. impacts on household income, labour market, gender), and identifies a major policy gap in how these impacts are addressed (ESABCC 2024: 234).

We find that this is particularly true of the implementation of some EGD macro-areas such as '6. From 'Farm to Fork': designing a fair, healthy and environmentally-friendly food system', '7. Preserving and restoring ecosystems and biodiversity', and '8. A zero pollution ambition for a toxic-free environment'. For macro-areas 7 and 8, the strategic documents analysed contained few references to just transition-related topics (see Section 2). However, the need for a just and fair transition was highlighted more strongly in the strategic documents related to the Farm to Fork strategy, although the concept was not developed in detail. Since the implications of this strategy affect not only farmers, fishermen and regional economies, as well as generating socio-economic impacts on actors along the value chain, achieving a just transition would also require a strategy to help vulnerable consumers impacted 'in terms of increasing overall food prices and differential access to healthy and sustainable foods' (EEA 2023a: 65).

Importantly, besides the just transition aspect, the implementation of actions in macro-areas 6, 7, and 8 is lagging behind (see ESABCC 2024: chapters 8 and 9). Since important pieces of legislation have not yet been adopted, it will be of uttermost importance to include the just transition principle in that legislation. In particular, a number of initiatives in these macro-areas are close to adoption at the time of the finalisation of the present research (February 2024), including: the proposal for a sustainable food labelling framework to empower consumers to make sustainable

food choices (Eco-score labelling); the Revision of the Ambient Air Quality Directive; and the Nature Restoration Law.

Regarding macro-area '3. Mobilising industry for a clean and circular economy', it appears important to include a comprehensive just transition perspective in a number of forthcoming/tailed initiatives, such as the Net Zero Industry Act and the Proposal for a Directive amending Directive 2008/98/EC on waste.

#### ***4.2 Mainstreaming and coherence***

As shown in sections 2 and 3, a just transition perspective is only included to a relatively limited extent in the strategic documents of some macro-areas, or in a number of policy instruments implementing the EGD: in some cases this objective is merely mentioned, in others there is a focus on specific issues/target groups.

Key EU initiatives for a just transition, such as the JTF and the SCF, were developed in parallel with policy strategies and legislation primarily pursuing 'green' objectives. They were seen as complementary initiatives to the latter, to address their potentially regressive social consequences. However, as noted by Akgüç et al. (2022: 2-3), 'just transition means that addressing both the employment and the distributional effects of a shift to a net-zero economy should be seen as an integral part of the package and not only as supplementary corrective measures'. Hence, in order to develop a coherent just transition framework guided by the 'Leave no one behind principle', it would be necessary to combine the 'corrective stance' adopted in some initiatives with a more consistent mainstreaming of just transition considerations into EU policies, in order to create synergies and avoid counterproductive social effects. While this primarily concerns the link between climate policies and social policies – a link still considered as insufficient in recent assessments by the European Scientific Advisory Board on Climate Change (ESABCC 2024) – just transition considerations should be mainstreamed not just into environmental and climate change policies, but also into other crucial policy domains such as fiscal policies (see EEA 2022), spatial planning (see European Parliamentary Research Service – EPRS 2021), the provision of essential services such as energy, water and sanitation, public transport, and access to healthy diets and improved air quality (ESABCC 2023).

#### ***4.3 Comprehensiveness and integration***

Overall, it emerges from our study that, in terms of targets, while the various instruments analysed point to a variety of vulnerabilities, there is an emphasis on specific territories, sectors and issues (notably regions dependent on fossil fuels for energy or greenhouse gas intensive industries, energy and transport poverty, the need to re-skill and up-skill the workforce). This is particularly true for those initiatives providing the Member States with funding. While these are certainly key territories to be supported and issues to be addressed, other vulnerabilities related to

both the social implications of the green transition and the consequences of climate change and environmental degradation have been identified more vaguely. This is also true for the gender dimension of green transition policies. Taking as an example measures related to energy, the ESABCC (2024) notes that a simplified definition, linking vulnerability in the context of high energy bills to disposable income alone, is insufficient: 'social inequalities in the context of climate change mitigation are also linked to, among other factors, spatial location (e.g. rural/urban) gender, ethnicity, age and disability' (ESABCC 2024:232; see also Intergovernmental Panel on Climate Change - IPCC 2022). In the European Commission's progress assessment of the Energy Union and Climate Action, it is found that adopting an intersectional perspective when actively working to promote human rights and gender equality through Member States' NECPs results in demonstrably positive impacts of measures in this field, for instance in energy company practices (European Commission 2023d: 57).

When it comes to linking welfare policies and green transition policies, our study shows an unbalanced picture. We find a major emphasis on what we have defined as the enabling function of the welfare state and, in part, on the benchmarking function (in this case, especially for vulnerabilities related to the domains of energy and transport). The enabling function is seen from a strong social investment and activation perspective, while less attention is paid to the need to 'greening' welfare infrastructure. An emphasis, at the discursive level, on the consensus building/conflict management function also emerges from our textual analysis, while buffering policies seem to be underdeveloped in the EU's just transition framework. In general, the links between green transition and welfare policies should be further developed at EU level, particularly the link between green transition policies and social protection and inclusion systems.

The 2022 Council Recommendation on a fair transition tries to better define the notion of 'vulnerabilities' in the green transition and to systematically address various types of vulnerabilities in an integrated manner. Furthermore, the 2022 Council Recommendation identifies a broad range of welfare policies to be deployed or adapted in order to achieve a just green transition and calls on the Member States to adopt integrated and comprehensive policy packages. This is important because Member States usually do not have comprehensive just transition strategies in place (Council of the European Union 2023a).

#### ***4.4 Knowledge basis***

A more comprehensive and integrated EU just transition framework should have a stronger knowledge basis. First, important steps could be taken towards better defining vulnerabilities in the green transition. There are now EU-wide definitions of energy poverty, in the SCF Regulation and in the revised Energy Efficiency Directive, and of transport poverty, in the 2022 Council Recommendation on a fair transition and in the SCF Regulation. However, there remain a range of definitions of energy poverty in the NECPs across EU Member States. The European Commission's

assessment of progress towards the objectives of the Energy Union and Climate Action (European Commission 2023d) finds that most countries do not (yet) provide an explicit definition of energy poverty (14). It therefore concludes that there is clearly scope for the Commission to provide additional guidance to the Member States (ibid.): i) through the EU-level definition of energy poverty established in the recast Energy Efficiency Directive; ii) in the revision of the energy poverty Recommendation; and iii) in the Coordination Group on Energy Poverty and Vulnerable Customers (which functions as a dialogue platform).

The ESABCC (2024) also highlights the need for more analysis of the policy impacts of green transition policies (ex ante and ex post), considering both social distribution – co-benefits (concerning health, energy security, social cohesion) and unintended harm – and policy effectiveness (since limited systemic measurement of outcomes can limit policies' impact).

In addition, the organisation and implementation of a just transition requires a deeper understanding of 'socio-ecological risks'. In order to construct genuinely integrated just transition indicators able to measure these risks and to guide policy-making, data will need to be developed and customised. In particular, McCauley and Pettigrew (2022) identify a number of EGD areas for which the justice dimension of the transition should be further explored, and new indicators would probably be needed. These include, for instance (ibid.): i) measures to enhance the energy and resource efficiency of buildings; ii) measures on social protection and inclusion in relation to the smart mobility initiative; iii) the EGD 'Farm to Fork strategy'; and iv) the relationship between social objectives and biodiversity and ecosystem management strategies.

#### **4.5 Funding**

There are a limited number of EU instruments directly providing funding for just transition policies. The financial resources of both the JTF and the SCF are expected to be insufficient to achieve their stated objectives in the foreseen window of time (European Court of Auditors 2022, 2023; ESABCC 2024; IEEP 2023). Both instruments could be considerably reinforced. The SCF should be targeted and resourced appropriately, as its current reliance on EU ETS revenues is likely to remain insufficient (ESABCC 2024; EESC 2023). Weaknesses in the current design and targeting of the JTF include insufficient and volatile funding, the restrictive eligibility criteria, which were found to be inadequate for determining the worst-off in the transition, and differences in administrative capacity between regions, leading the ESABCC (2024: 281) to doubt whether the design and ambition of this initiative matches the scale of the transition required. This entails the likely

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14. 'Among those who do, the definition is not necessarily official. A few countries have established precise legal definitions, while most of the others have yet to provide official interpretations' (European Commission 2023d: 54).

consequence that not all individuals, households and enterprises who can be assumed to be seriously affected by the green transition will be reached by EU initiatives.

A careful assessment should be carried out of the functioning of the available funds relevant to the just transition, including their adequacy, their continuity in time, synergies and overlaps – a point emphasised by the European Court of Auditors (2022). Besides the existing funding sources, there are proposals for the creation of a more ambitious and sizeable EU Fund fully in line with the just transition objectives, modelled on the Recovery and Resilience Facility (see Belgian High Committee for a Just Transition 2023). Our analysis shows indeed that the RRF is in some ways a missed opportunity, since the just transition is a secondary objective and there are few explicit references to policies simultaneously pursuing green and social objectives.

This said, it is clear that EU funds are not intended to provide all the resources needed by the Member States: financial contributions from the Member States remain essential in this transition. Although, however, Member States should have enough budgetary scope to implement just transition policies, this may not be the case, given the fiscal consolidation pressures that will likely derive from the revised EU economic governance framework (see Theodoropoulou forth.).

#### ***4.6 Stakeholders' involvement***

The organisation of national social dialogue and civil dialogue is a competence of the Member States. As our analysis shows, the aim to enhance stakeholders' involvement and citizens' participation is a key element in the EU's just transition initiatives and, in some cases, a requirement. This said, this aim does not seem to match the reality in the Member States.

Reviewing the national multilevel climate and energy dialogue structures that the Member States were required to set up under art. 11 of the Regulation on the governance of the Energy Union, the European Commission's assessment notes that various levels of maturity of the dialogue were identified (European Commission 2023d).

Concerning multi-level dialogues in the planning processes on energy and climate, the European Scientific Advisory Board on Climate Change points out that there is no guarantee that public consultation processes during national/local energy and climate planning are of sufficient quality, given that the European Climate Law encourages but does not require the involvement of advisory bodies, and neither do the NECP procedural obligations. In terms of monitoring, the information reported leaves considerable uncertainty over '(i) the number of Member States with permanent multilevel dialogue, (ii) the involvement of all required stakeholder categories and (iii) the coverage of topics discussed' (ESABCC 2024:276).



In the design and implementation, also, of the JTF's Territorial Just Transition Plans, available studies highlight considerable variation between the Member States in the scope, openness, and effectiveness of stakeholders' involvement (Eurofound 2023).

In general, ensuring that participatory structures align more closely with the Aarhus Convention would require progress beyond the current structures, standard actors and means of involvement, to generate meaningful and continual participation in decision-making processes. This would strengthen the procedural justice credentials of the EU just transition framework, an aspect which currently seems to be less valued than the distributive understanding of social justice (Armeni 2023). Many actors, including the European Commission (2022b) itself have called for progress beyond the current practices defined and structured by scientific and political institutions. The EEA (2023b) refers to the EGD objective to have 'citizens as the driving force', calling for greater ambition in the changing and reframing of the very processes of participation, to increase citizens' significance in policy and decision making. Innovative methods based on deliberation, such as citizens' assemblies or community boards, can provide promising additions to existing structures and processes (Sabato et al. 2023).

#### ***4.7 'Bindingness' on Member States and EU monitoring***

In many cases, the EU instruments relevant to the just transition are recommendations and guidelines to the Member States, which leave countries considerable freedom as to whether and how to implement just transition policies. The 2022 Council Recommendation on ensuring a fair transition towards climate neutrality calls on the Member States to implement coherent and consistent policy packages, combining a 'whole of society' approach with a more 'granular' approach.

The 2022 Council Recommendation is, however, a non-binding instrument. To be sure, the fact that the Member States have room for manoeuvre in policy elaboration and implementation is not necessarily a shortcoming: it is a matter of subsidiarity and competences, coupled with the need to design initiatives suited to national and regional specificities. Nevertheless, better and more stringent monitoring of national just transition policies at the EU level appears necessary, especially regarding the non-binding 2022 Council Recommendation on a fair transition and for instruments for which the Commission undertook to formulate just transition guidelines (e.g. the LULUCF Regulation).

Several assessments underline that currently, the low level of bindingness, combined with a lack of adequate monitoring, make it less likely that just transition considerations will be reflected in policy implementation. The ESABCC (2024:234) notes that 'despite the better regulation toolbox being equipped with instructions regarding their assessment, distributional and wider socioeconomic impacts analysis remains limited and non-systematic'. The European Commission (2023d) states,

in its assessment of progress towards the objectives of the Energy Union and Climate Action, that of the six Member States which finished the mandated assessment on support schemes for renewable energy, five included information on their effectiveness, but with no, limited or unclear information on their distributive effects. More in general, as already mentioned, Member States do not usually have comprehensive just transition strategies in place (Council of the European Union 2023).

Against this backdrop, more and better EU monitoring is crucial. This would help ensure consistency among the various instruments relevant to the just transition, and make it more likely for the just transition dimension to be taken into account in Member States' policies. The European Semester and the NECPs emerge as key governance procedures to make sure that a comprehensive just transition approach is implemented by the Member States, that monitoring frameworks are adopted, and that EU instruments relevant to the just transition are implemented in an integrated and mutually reinforcing way. The just transition perspective should thus be better integrated into these processes, and it will be necessary to ensure that recommendations and policies emerging from the European Semester and in the NECPs are consistent.

#### ***4.8 Level of ambition***

Overall, the limitations and gaps of EU just transition policies identified by this study and by other assessments, and the scale of the challenges ahead, call for more ambitious EU just transition policies and an increased role for the EU in this domain. As remarked by the IEEP (2023) in its latest European Green Deal Barometer, 'nine in ten (89%) EU experts familiar with these policies believe that the EGD agenda ensures a just energy transition to at least a limited extent. However, only one in six (17%) believe it ensures a just transition to a great extent or more' (IEEP 2023: 40).

Proposals have been made for a more ambitious Green and Social Deal or a new social contract for sustainability (the latter was recently discussed by the Commission's Joint Research Centre: see Matti et al. (2023)). These proposals often point to the need to achieve better integration of ecological and social objectives and policies. In some cases, the proposals are based on an economic model moving away from the 'growth-first' imperative, calling for the implementation of de-growth or beyond growth approaches (cf. EPRS 2023).

At the EU level, more ambitious green transition policies should go hand in hand with more ambitious, comprehensive and effective social policies. While the sizeable socioeconomic impacts of the transition 'call for a strong link between climate policies and social policies' (ESABCC 2024: 232), analysis conducted by the EEA and Eurofound (2021) and by Gancheva et al. (2023) has found this link to be insufficient.

Adopting a more integrated 'eco-social approach' at the EU level will require a reflection on the EU's rather limited social policy competences, given the increasing imbalance between binding EU environmental/climate measures and targets and the more limited scope for action and resources in the social domain (Akgüç et al. 2022; Petmesidou and Guillén 2022). This imbalance is likely to negatively impact citizens' support for the EGD agenda and may be a threat to the Union's legitimacy, especially in a context in which some Member States may not have sufficient budgetary resources to implement ambitious and effective social policies.

Besides institutional aspects, such an ambitious approach would require the implementation of more innovative and integrated 'eco-social policies' (Mandelli 2022). The sustainable welfare perspective provides some policy options in that direction, in particular to reduce the growth-dependency of welfare systems, with a view to supporting needs satisfaction for all within planetary boundaries and within a post-growth economic context (Büchs et al. 2023; Koch 2022; see also Sabato et al. 2023). Several of the assessments/evaluations considered in this analysis underscore the need to transform economic and social systems more profoundly and more ambitiously in order to meet transition objectives. Examples include: i) revising property taxation schemes and wealth taxes (EEA 2022: 12); ii) stepping up actions for the provision of accessible low-carbon infrastructure and social services – such as renewable energy infrastructure, building retrofits, clean mobility, redesigned urban spaces (see ESABCC 2023: 89) <sup>(15)</sup>; and a clearer focus on quality of life (EPRS 2021).

In order to improve the integration of green transition and social policies at the EU level, a first, urgent step would be to create more tangible links and synergies between transition policies and the European Pillar of Social Rights, the key reference framework for EU social policies. After all, in the 2019 Commission Communication on the EGD, the Pillar was identified as the key instrument to ensure a socially just transition leaving no one behind.

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15. The ESABCC (2023: 89) elaborates that 'some of the most important health and well-being synergies associated with climate action come from investing in key basic infrastructure like clean energy, thermal comfort, clean drinking water and sanitation, public transport, and access to healthy diets and improved air quality from transformative solutions across economic sectors including agriculture, energy, transport, and buildings'.

## 5. Conclusions and policy implications

The main objective of this study was to assess how the LNOB principle has, so far, been taken into account in the implementation of the EGD, with a view to ensuring a just, green transition.

Our analysis of EGD-related strategies and policy instruments shows that, after the publication of the EGD Communication in 2019, an EU framework for a just transition has emerged, i.e. a set of policy orientations, legislation and funding provided by the EU and aimed at ensuring that the EU and its Member States can make the most of the opportunities deriving from the green transition while addressing the related social challenges. This framework is made up of a few EU initiatives explicitly aimed at ensuring a just transition (i.e. at addressing certain social challenges emerging from the green transition and, in some cases, providing funding for this purpose) and of some provisions mainstreaming (to varying extents) just transition considerations into other initiatives implementing the EGD.

While the development of this framework in a relatively short time period is not a negligible result, our analysis shows a number of gaps and limitations. In terms of vulnerabilities addressed, most EU initiatives (especially those providing the Member States with funding) have a marked territorial/sectoral focus (in particular, on regions that rely heavily on fossil fuels for energy or greenhouse gas intensive industries) and an issue-specific focus (notably, on energy-related issues). Furthermore, work is needed to better define and identify green transition-related vulnerabilities. Regarding the (eco-social) policy measures emerging from EU initiatives, we find an emphasis on what we have defined as the enabling function of the welfare state (from a social investment/activation perspective) and, in part, on the benchmarking function (in this case, especially in relation to vulnerabilities related to energy and transport). An emphasis, at the discursive level, on the consensus building/conflict management function also emerges from our text analysis, while significantly less attention is devoted to the buffering function.

In more detail, our analysis – in addition to the main findings of several assessments / evaluations touching upon the just transition dimension of the EGD implementation – allows us to identify a number of gaps and limitations in the current EU framework for a just transition, regarding its: i) scope; ii) mainstreaming and coherence; iii) comprehensiveness and integration; iv) knowledge basis; v) funding; vi) stakeholder involvement; vii) 'bindingness' on Member States and EU monitoring; and viii) level of ambition.

Consequently, the EU just transition framework is still insufficient when compared to the magnitude of the challenges ahead. Strengthening and developing further such a framework is particularly urgent in the context of the reflections on setting the 2040 climate target, launched by the European Commission (2024) in February, which envisage (among other things) options based

on an acceleration of the green transition, while restating '[the] imperative that the transition has to be just [which] is at the heart of the European Green Deal' (European Commission 2024:4).

Against this background, besides ensuring full implementation of the initiatives already enacted, the EU just transition framework should be significantly broadened and made more effective, including through the elaboration of more ambitious policies and governance arrangements. Hence, we propose *11 policy implications* on the way forward, to enhance the role of the just transition in the future implementation of the European Green Deal, and in EU policies in general.

### **5.1 Policy implications**

1. A more integrated approach to policy-making is needed, to ensure more consistent mainstreaming of the just transition dimension into the legislation implementing the EGD, particularly in those macro-areas where implementation is lagging behind and the just transition perspective appears less developed.
2. There needs to be more systematic and comprehensive ex-ante and ex-post measurement of the distributional and wider socioeconomic impacts of climate and environmental initiatives implementing the EGD (including measurements of the co-benefits of these policies) <sup>(16)</sup>. It is important to further develop the Distributional Impact Assessment methodology (DIA) currently being discussed at the EU level along these lines, and to apply it consistently.
3. The role of the 2022 Council Recommendation on ensuring a fair transition towards climate neutrality in EU policy-making must be enhanced, and its implementation closely monitored. Further reflection is needed on how to link green transition policies and welfare policies more closely, in particular social protection and inclusion policies. Innovative and more integrated policy options in this respect should be explored, including through exchanges in EU mutual learning fora.
4. It is important to work on developing more integrated socio-ecological indicators and to explore ways to include them in EU policy-making, either through the creation of an EU Just Transition Scoreboard or by integrating them into existing scoreboards, such as the European Pillar of Social Rights' Social Scoreboard.
5. A careful assessment needs to be carried out of the functioning of the existing EU funds relevant to the just transition, including their adequacy, their ability to reach groups and categories vulnerable to the consequences of green transition policies, their continuity in time, and synergies and overlaps. Funding policies integrating green and social objectives from a just transition perspective should be a key priority for future EU overarching funding

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16. This is in line with a recent recommendation by the ESABCC (2024).

sources such as the Recovery and Resilience Facility (if any RRF-like instrument is established in the future).

6. Stakeholder and citizens' involvement should be a key area for the Commission's monitoring of the implementation of just transition policies in the Member States. In particular, there should be close monitoring of Member States' implementation of the '2023 Council Recommendation on strengthening social dialogue in the European Union' <sup>(17)</sup>, especially in the context of the green transition. The recent proposal by the European Economic and Social Committee <sup>(18)</sup> to adopt a 'Directive for Just Transition of the World of Work' should be taken into consideration.
7. Besides the need to strengthen existing social dialogue and civil dialogue procedures, experiments with more innovative participatory methods, such as deliberative mini publics, could be further explored.
8. A just transition perspective should be fully integrated into the European Semester. The Semester is a key process for monitoring the implementation of the 2022 Council Recommendation on ensuring a fair transition towards climate neutrality.
9. The knowledge basis of the European Semester must therefore be broadened, including the use of more integrated eco-social indicators and broader well-being indicators.
10. In order to improve the quality of the policy-making process, fully combining environmental and climate-related objectives and concerns with social objectives and concerns, enhanced cooperation and exchanges are needed between the Employment, Social Policy, Health and Consumer Affairs Council (EPSCO) and the Environment Council (ENV) and their Committees. The possibility of organising regular joint meetings should be explored.
11. It is important to reflect on how to better combine green transition objectives with the principles of the European Pillar of Social Rights. The forthcoming Commission review of the EPSR Action Plan (foreseen in 2025) should pay particular attention to the socio-ecological dimension. A 'revamped' Action Plan should fully include measures listed in the 2022 Council Recommendation on ensuring a fair transition towards climate neutrality, but it should also explore the possibility of implementing eco-social policies which are more innovative and integrated from a sustainable welfare perspective. Examples of the latter include universal basic services, working time reduction, and less growth-reliant ways of financing welfare policies.

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## Annex 1. Summary tables

**Table 1. Documents included in the 'strategic level' analysis (in addition to the 2019 Commission Communication on the European Green Deal) – by macro-area**

Macro-areas	Strategic documents
<p><b>1. Increasing the EU's climate ambition for 2030 and 2050</b></p>	<p>European Commission (2020a) Stepping up Europe's 2030 climate ambition. Investing in a climate-neutral future for the benefit of our people, Communication from the Commission, COM(2020) 562 final, Brussels, 17.9.2020</p> <p>European Commission (2021a) Forging a climate-resilient Europe - the new EU Strategy on Adaptation to Climate Change, Communication from the Commission, COM(2021) 82 final, Brussels, 24.2.2021</p>
<p><b>2. Supplying clean, affordable and secure energy</b></p>	<p>European Commission (2020b), Powering a climate-neutral economy: An EU Strategy for Energy System Integration, Communication from the Commission, COM(2020) 299 final, Brussels, 8.7.2020</p> <p>European Commission (2020c) A hydrogen strategy for a climate-neutral Europe, Communication from the Commission, COM(2020) 301 final, Brussels, 8.7.2020</p> <p>European Commission (2020d) Communication on an EU strategy to reduce methane emissions, Communication from the Commission, COM(2020) 663 final, Brussels, 14.10.2020</p> <p>European Commission (2020e), Commission Recommendation (EU) 2020/1563 of 14 October 2020 on energy poverty</p>
<p><b>3. Mobilising industry for a clean and circular economy</b></p>	<p>European Commission (2020f) A New Industrial Strategy for Europe, Communication from the Commission, COM(2020) 102 final, Brussels, 10.3.2020</p> <p>European Commission (2020g) A new Circular Economy Action Plan. For a cleaner and more competitive Europe, Communication from the Commission, COM(2020) 98 final, Brussels, 11.3.2020</p>
<p><b>4. Building and renovating in an energy and resource efficient way</b></p>	<p>European Commission (2020h) A Renovation Wave for Europe - greening our buildings, creating jobs, improving lives, Communication from the Commission, COM(2020) 662 final, Brussels 14.10.2020</p>
<p><b>5. Accelerating the shift to sustainable and smart mobility</b></p>	<p>European Commission (2020i) Sustainable and Smart Mobility Strategy – putting European transport on track for the future, Communication from the Commission, COM(2020) 789 final, Brussels, 9.12.2020</p>
<p><b>6. From 'Farm to Fork': designing a fair, healthy and environmentally-friendly food system</b></p>	<p>European Commission (2020j) A Farm to Fork Strategy. for a fair, healthy and environmentally-friendly food system, Communication from the Commission, COM(2020) 381 final, Brussels,</p>

	<p>20.05. 2020</p> <p>European Commission (2021b) An action plan for the development of organic production, Communication from the Commission, COM(2021) 141 final/2, Brussels, Brussels, 19.4.2021</p>
<b>7. Preserving and restoring ecosystems and biodiversity</b>	<p>European Commission (2020k) EU Biodiversity Strategy for 2030 Bringing nature back into our lives, Communication from the Commission, COM(2020) 380 final, Brussels, 20.5.2020</p> <p>European Commission (2021c) New EU Forest Strategy for 2030, Communication from the Commission, COM(2021) 572 final, Brussels, 16.7.2021</p> <p>European Commission (2021d) A new approach for a sustainable blue economy in the EU Transforming the EU's Blue Economy for a Sustainable Future, Communication from the Commission, COM(2021) 240 final, Brussels, 17.5.2021</p> <p>European Commission (2021e) EU Soil Strategy for 2030 Reaping the benefits of healthy soils for people, food, nature and climate, Communication from the Commission, COM(2021) 699 final, Brussels, 17.11.2021</p>
<b>8. A zero pollution ambition for a toxic-free environment</b>	<p>European Commission (2020l) Chemicals Strategy for Sustainability Towards a Toxic-Free Environment', COM(2020) 667 final, Brussels, 14.10.2020</p> <p>European Commission (2021f) Pathway to a Healthy Planet for All EU Action Plan: 'Towards Zero Pollution for Air, Water and Soil', Communication from the Commission, COM(2021) 400 final, Brussels, 12.5.2021</p>
<b>9. Pursuing green finance and investment and ensuring a just transition</b>	<p>European Commission (2020m) Sustainable Europe Investment Plan. European Green Deal Investment Plan, Communication from the Commission, COM(2020) 21 final, Brussels, 14.1.2020</p> <p>European Commission (2021g) Strategy for Financing the Transition to a Sustainable Economy, Communication from the Commission, COM(2021) 390 final, Strasbourg, 6.7.2021</p> <p>European Commission (2020n) A strong Social Europe for just transitions, Communication from the Commission, COM(2020) 14 final, Brussels, 14.1.2020</p>
	<b>TOT: 21 documents</b>

**Table 2. Importance of the objective of achieving a just transition at the strategic level – by macro-area**

Macro-area	Importance	Overall assessment
1. <i>Increasing the EU's climate ambition for 2030 and 2050</i>	●	The just transition is a constitutive element (central especially to the Communication on the Climate Change Adaptation strategy)
2. <i>Supplying clean, affordable and secure energy</i>	●	Uneven emphasis on the just transition, with the exception of the 2020 Commission Recommendation on energy poverty
3. <i>Mobilising industry for a clean and circular economy</i>	○	Rather marginal role for the just transition (but some references in the Commission Communication on 'A New Industrial Strategy for Europe').
4. <i>Building and renovating in an energy and resource efficient way</i>	●	The just transition is a constitutive element of the Renovation Wave strategy (although this expression is seldom explicitly mentioned)
5. <i>Accelerating the shift to sustainable and smart mobility</i>	●	The just transition is an important element of the Sustainable and Smart Mobility strategy. However, limited mainstreaming across the strategy
6. <i>From 'Farm to Fork': designing a fair, healthy and environmentally-friendly food system</i>	●	The just transition is an important element of the Farm to Fork strategy. However the focus is sometimes rather narrow.
7. <i>Preserving and restoring ecosystems and biodiversity</i>	○	The just transition plays a rather marginal role in the strategic documents related to this macro-area
8. <i>A zero pollution ambition for a toxic-free environment</i>	○	The just transition plays a rather marginal role in the strategic documents related to this macro-area
9. <i>Pursuing green finance and investment and ensuring a just transition</i>	●	The just transition emerges as a constitutive element of both the 'Sustainable Europe Investment plan' and of the Commission Communication 'A strong Social Europe for just transitions', while it is a marginal element of the Communication on the Sustainable Finance strategy

**Note:** ●: just transition plays a (relatively) important role in the strategic documents of this macro-area; ○: just transition plays a (relatively) marginal role in the strategic documents of this macro-area.

**Source:** own elaboration from the documents mentioned in Table 1.

**Table 3. Main targets in relation to the just transition (strategies)**

Macro-area	People living in poverty	Vulnerable workers	Vulnerable businesses/sectors	Vulnerable territories	Gender dimension	Other vulnerable citizens
1. <i>Increasing the EU's climate ambition for 2030 and 2050*</i>	○	●	●	●		●
2. <i>Supplying clean, affordable and secure energy*</i>	●		●	●		●
3. <i>Mobilising industry for a clean and circular economy</i>		○	●	●	○	
4. <i>Building and renovating in an energy and resource efficient way*</i>	●	○	○	○	○	●
5. <i>Accelerating the shift to sustainable and smart mobility*</i>	○	●		●	○	●
6. <i>From 'Farm to Fork': designing a fair, healthy and environmentally-friendly food system*</i>	○	●	●	○	○	●
7. <i>Preserving and restoring ecosystems and biodiversity</i>		○			○	○
8. <i>A zero pollution ambition for a toxic-free environment</i>	○	●				●
9. <i>Pursuing green finance and investment and ensuring a just transition*</i>	○	●	●	●		○

**Notes:** \*: macro-area in which the just transition objective has been assessed as relatively important (see Table2); ○: target less highlighted in the macro-area (in relation to the just transition); ●: target more highlighted in the macro-area (in relation to the just transition).

**Source:** own elaboration from the documents mentioned in Table 1.

**Table 4. Welfare state functions (strategies)**

Macro-area	Benchmarking	Enabling (social investment/activation)	Enabling (ecological footprint welfare state)	Buffering	Consensus building/conflict management
1. <i>Increasing the EU's climate ambition for 2030 and 2050*</i>	●	●	○	○	○
2. <i>Supplying clean, affordable and secure energy*</i>	●	●	○	○	○
3. <i>Mobilising industry for a clean and circular economy</i>	○	●			○
4. <i>Building and renovating in an energy and resource efficient way*</i>	●	●	●		●
5. <i>Accelerating the shift to sustainable and smart mobility*</i>	●	●			○
6. <i>From 'Farm to Fork': designing a fair, healthy and environmentally-friendly food system*</i>	●	○		○	○
7. <i>Preserving and restoring ecosystems and biodiversity</i>	○	●			○
8. <i>A zero pollution ambition for a toxic-free environment</i>	○	○			○
9. <i>Pursuing green finance and investment and ensuring a just transition*</i>	●	●	○		○

**Notes:** \*: macro-area in which the just transition objective has been assessed as relatively important (see Table 2); ○: welfare state function less highlighted in the macro-area (in relation to the just transition); ●: welfare state function more highlighted in the macro-area (in relation to the just transition).

**Source:** own elaboration from the documents mentioned in Table 1.



**Table 5. Documents included in the 'instruments' analysis (in chronological order)**

Instruments	Reference documents
<b>Recovery and Resilience Facility</b> (February 2021)	European Union (2021) <b>Regulation</b> (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility, Official Journal of the European Union, L 57, 18.02.2021  European Commission (2021h) Guidance to Member States Recovery and Resilience Plans, <b>Commission Staff Working Document</b> , PART 1/2, SWD(2021) 12 final, 22.01.2021
<b>European Climate Law</b> (June 2021)	European Union (2021a) <b>Regulation</b> (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law')
<b>Just Transition Fund</b> (June 2021)	European Union (2021b) <b>Regulation</b> (EU) 2021/1056 of the European Parliament and of the Council of 24 June 2021 establishing the Just Transition Fund, PE/5/2021/REV/1, OJ L 231, 30.6.2021, p. 1–20
<b>Pact for Skills</b> (2021)	European Commission (2020o) European Skills Agenda for sustainable competitiveness, social fairness and resilience, <b>Communication</b> from the Commission, COM(2020) 274 final, Brussels, 1.7.2020  European Commission (2021i), Pact for Skills - <b>Charter</b>
<b>Council Recommendation on ensuring a fair transition towards climate neutrality</b> (June 2022)	Council of the European Union (2022) <b>Council Recommendation</b> on ensuring a fair transition towards climate neutrality, 9107/22, 07.06.2022
<b>Commission Guidance on the update of NECPs</b> (December 2022)	European Commission (2022a) Commission <b>Notice</b> on the Guidance to Member States for the update of the 2021-2030 national energy and climate plans, OJEU, C 495/24, 29.12.2022
<b>Green Deal Industrial plan</b> (February 2023)	European Commission (2023a), A Green Deal Industrial Plan for the Net-Zero Age, <b>Communication</b> from the Commission, COM(2023) 62 final, Brussels, 1.2.2023
<b>RePowerEU chapters in Recovery and Resilience plans</b> (February 2023)	European Union (2023a) <b>Regulation</b> (EU) 2023/435 of the European Parliament and of the Council of 27 February 2023 amending Regulation (EU) 2021/241 as regards REPowerEU chapters in recovery and resilience plans and amending Regulations (EU) No 1303/2013, (EU) 2021/1060 and (EU) 2021/1755, and Directive 2003/87/EC, Official Journal of the European Union, L 63, 28.2.2023

	European Commission (2023b) <b>Guidance</b> on Recovery and Resilience Plans in the context of REPowerEU, Draft Commission Notice, Annex, C_2023_876_1_annexe_EN_0, Commission Secretariat-General, 01.02.2023
<b>LULUCF Regulation</b> (April 2023)	European Union (2023b) <b>Regulation</b> (EU) 2023/839 of the European Parliament and of the Council of 19 April 2023 amending Regulation (EU) 2018/841 as regards the scope, simplifying the reporting and compliance rules, and setting out the targets of the Member States for 2030, and Regulation (EU) 2018/1999 as regards improvement in monitoring, reporting, tracking of progress and review, Official Journal of the European Union, L 107/1, 21.4.2023
<b>‘Enhanced’ Modernisation Fund</b> (May 2023)	European Union (2023c) <b>Directive</b> (EU) 2023/959 of the European Parliament and of the Council of 10 May 2023 amending Directive 2003/87/EC establishing a system for greenhouse gas emission allowance trading within the Union and Decision (EU) 2015/1814 concerning the establishment and operation of a market stability reserve for the Union greenhouse gas emission trading system, Official Journal of the European Union, L 130/134, 16.5.2023
<b>Social Climate Fund</b> (May 2023)	European Union (2023d) <b>Regulation</b> (EU) 2023/955 of the European Parliament and of the Council of 10 May 2023 establishing a Social Climate Fund and amending Regulation (EU) 2021/1060, Official Journal of the European Union, L 130/1, 16.5.2023
<b>Revised Energy Efficiency Directive</b> (September 2023)	European Union (2023e) <b>Directive</b> (EU) 2023/1791 of the European Parliament and of the Council of 13 September 2023 on energy efficiency and amending Regulation (EU) 2023/955 (recast), Official Journal of the European Union, L 231/1, 20.9.2023
<b>Commission Recommendation on energy poverty</b> (October 2023)	European Commission (2023c) <b>Commission Recommendation</b> (EU) 2023/2407 of 20 October 2023 on energy poverty, Official Journal of the European Union, L 2023/2407, 23.10.2023
<b>Revised Renewable Energy Directive</b> (October 2023)	European Union (2023f) <b>Directive</b> (EU) 2023/2413 of The European Parliament and of the Council of 18 October 2023 amending Directive (EU) 2018/2001, Regulation (EU) 2018/1999 and Directive 98/70/EC as regards the promotion of energy from renewable sources, and repealing Council Directive (EU) 2015/652, Official Journal of the European Union, L 2023/2413, 3.10.2023
	<b>TOT: 17 documents</b>

**Table 6. Importance of the objective of achieving a just transition in the selected 'instruments'**

Instrument	Central	Element	Funding
Recovery and Resilience Facility		○	○
European Climate Law		●	
Just Transition Fund	●		●
Pact for Skills	●		
Council Recommendation on ensuring a fair transition towards climate neutrality	●		
Commission Guidance on the update of NECPs		●	
Green Deal Industrial plan		○	
REPowerEU chapters in RRP		●	○
LULUCF Regulation		○	
'Enhanced' Modernisation Fund	●		●
Social Climate Fund	●		●
Revised Energy Efficiency Directive		●	
Commission Recommendation on energy poverty	●		
Revised Renewable Energy Directive		○	

**Note:** ●: just transition plays an important role in this instrument; ○: just transition plays a (relatively) marginal role in this instrument.

**Source:** own elaboration from the documents mentioned in Table 5.

**Table 7. Main targets in relation to the just transition (instruments)**

Instrument	People living in poverty	Vulnerable workers	Vulnerable businesses/sectors	Vulnerable territories	Gender dimension	Other vulnerable citizens
Recovery and Resilience Facility	()	()	()	()	()	()
European Climate Law	○	()	()	()		()
Just Transition Fund	○	●	●	●	○	
Pact for Skills		●	●		●	
Council Recommendation on ensuring a fair transition towards climate neutrality	●	●	●	○	●	●
Commission Guidance on the update of NECPs	●	()	()	()	○	●
Green Deal Industrial plan		○	○		○	
REPower EU chapters in RRP	●		●		()	●
LULUCF Regulation						
'Enhanced' Modernisation Fund	●	○		●		●
Social Climate Fund	●		●	○	○	●
Revised Energy Efficiency Directive	●		○	○		●
Commission Recommendation on energy poverty	●				○	●
Revised Renewable Energy Directive	○					○

**Note:** ●: target more highlighted (in relation to the just transition); ○: target less highlighted (in relation to the just transition); '()': target potentially present (in relation to the just transition) but too implicit or expressed too generally to be classified according to our criteria.

**Source:** own elaboration from the documents mentioned in Table 5.

**Table 8. Welfare state functions (instruments)**

Instrument	Benchmarking	Enabling (social investment/activation)	Enabling (ecological footprint welfare state)	Buffering	Consensus building/conflict management
Recovery and Resilience Facility	○	○	○		()
European Climate Law	○	○			●
Just Transition Fund	●	●	○		●
Pact for Skills	○	●			●
Council Recommendation on ensuring a fair transition towards climate neutrality	●	●	○	●	●
Commission Guidance on the update of NECPs	●	●	○	○	●
Green Deal Industrial plan	○	●			○
REPowerEU chapters in RRP	●	●			()
LULUCF Regulation	○				
'Enhanced' Modernisation Fund		●			○
Social Climate Fund	●		○	●	●
Revised Energy Efficiency Directive	●		●		●
Commission Recommendation on energy poverty	●	●		○	○
Revised Renewable Energy Directive	○	○	○		●

**Note:** ●: welfare state function more highlighted (in relation to the just transition); ○: welfare state function less highlighted (in relation to the just transition; '()': dimension potentially present (in relation to the just transition) but too implicit or expressed too generally to be classified according to our criteria.

**Source:** own elaboration from the documents mentioned in Table 5.