



# To be or not to be continued?

Analysis of the Just Transition Fund implementation  
across six EU countries

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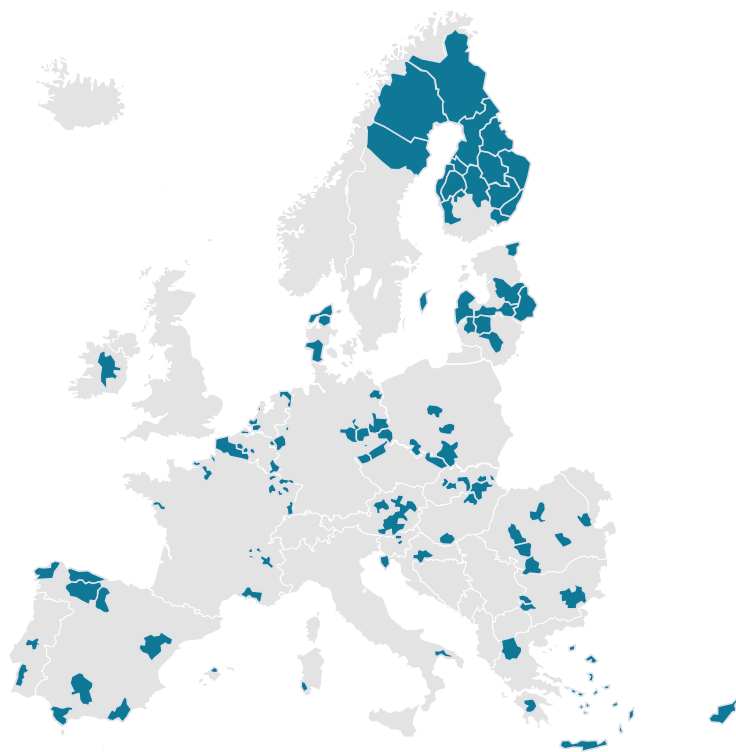
## 1. Introduction

We are now at the midpoint of the current Multiannual Financial Framework. Looking back at the implementation to date, it is important to acknowledge that the Just Transition Mechanism,<sup>1</sup> and in particular the Just Transition Fund (JTF), were new instruments that required significant institutional and administrative adjustments from all stakeholders. The regulation establishing the JTF was adopted in June 2021. The majority of the Territorial Just Transition Plans (TJTPs) had been approved by the European Commission by the end of 2022, with only the Bulgarian one completed in 2023. At this point, the programming of the JTF was effectively finished and implementation could finally commence.

On 16 July 2025, the European Commission proposed a fundamentally re-designed long-term EU budget for 2028–2034, amounting to nearly €2 trillion (around 1.26% of the EU gross national income). The proposal streamlines existing programmes into a smaller number of policy-focused pillars, with the stated aim of better aligning EU spending with strategic priorities such as competitiveness, security, cohesion and external action. Its key innovations include the introduction of National and Regional Partnership Plans, as well as the establishment of a European Competitiveness Fund, which concentrates resources on the clean transition, industrial decarbonisation, digital innovation, health and defence.

In this evolving policy context, the just transition has increasingly slipped out of the political spotlight, and the commitment that “nobody will be left behind” risks being diluted. This report, therefore, seeks to explain why continued and targeted support for regions in transition remains essential. While current implementation progress may appear modest when assessed through headline indicators, this reflects structural and timing-related constraints rather than a lack of relevance or need.

### What is the Just Transition Fund?



Source: Forum Energii's own work.

<sup>1</sup> European Commission, *The Just Transition Mechanism: making sure no one is left behind*, n.d., [https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/finance-and-green-deal/just-transition-mechanism\\_en](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/finance-and-green-deal/just-transition-mechanism_en).

The Just Transition Fund (JTF) is a key tool to support territories most affected by the transition towards climate neutrality. Formally adopted in 2021, the JTF is the first pillar of the Just Transition Mechanism (JTM).<sup>2</sup>

The Just Transition Fund has been implemented under shared management, within the broader framework of the EU's Cohesion Policy, which serves as the primary instrument for reducing regional disparities and addressing structural changes in the EU.

The JTF has been endowed with €17.5 billion (€19.7 billion in current prices, including transfers from other funds). This amount corresponds to resources that have been made available under a newly established allocation to support EU Member States in their green transition. €7.5 billion is financed under the EU's 2021–2027 budget, while the remaining €10 billion constitutes external assigned revenue stemming from the European Recovery Instrument (NextGenerationEU).

The Just Transition Fund aims to support regions and people in addressing the social, employment, economic and environmental impacts of the energy transition, related to economic diversification, support for small and medium-sized enterprises, the creation of new companies, research and innovation, repurposing of land and assets, clean energy deployment, re- and upskilling of workers, as well as job-search assistance and the active inclusion of jobseekers programmes.<sup>3</sup> The JTF is expected to mobilise close to €30 billion in investments.<sup>4</sup>

### 1.1. Bringing the Just Transition Fund (JTF) to life

- **11 December 2019:** The European Green Deal was presented, which outlined the need for a Just Transition Mechanism to support vulnerable regions.
- **14 January 2020:** The European Commission proposed the Just Transition Fund as part of a broader Just Transition Mechanism, set to mobilise at least €150 billion between 2021–2027.
- **May 2020:** The European Commission proposed an enhanced JTF as part of the EU's recovery plan, increasing the Fund's capacity in response to COVID-19.
- **September 2020:** The European Parliament and EU Council began negotiations on the Fund's regulation.
- **16 December 2020:** Provisional agreement reached between EU negotiators, setting the Fund at around €17.5 billion, earmarking funds strictly for climate-neutral projects and excluding fossil fuel financing.
- **July 2021:** The Just Transition Fund regulation was formally adopted, allowing for disbursements to support affected regions.

By the end of 2022, the European Commission had adopted all JTF programmes submitted by Member States, with only Bulgaria delaying the process until 2023. Following the approval of Territorial Just Transition Plans (TJTPs), the programming of the JTF was completed, and efforts focused on implementation. The TJTPs had to include a description of the transition process at the national level and a demonstration of its negative impact at the level of the territory by 2030 or earlier. Without a clear demonstration of the transition process, the Commission services could not proceed with the adoption of the JTF programmes. In total, 96 regions, across all the Member States, receive support from the Fund's through 70 plans.

<sup>2</sup> The Just Transition Mechanism is designed to address the social and economic impacts of the transition by targeting regions, industries and workers facing the greatest challenges, through three complementary pillars. At its core is the Just Transition Fund, which provides direct support to affected regions and is intended to leverage national co-financing. This is complemented by a dedicated Just Transition window under InvestEU, combining EU budget guarantees with advisory support to crowd in private investment, and by the Public Sector Loan Facility, which blends EU grants with European Investment Bank loans to enable large-scale public investments. Together, these instruments are meant to maximise leverage, align public and private resources, and support place-based transition strategies in the most affected territories.

<sup>3</sup> *Regulation (EU) 2021/1056 of the European Parliament and of the Council of 24 June 2021 establishing the Just Transition Fund*, OJ L 231, 30.6.2021, p. 1, <https://eur-lex.europa.eu/eli/reg/2021/1056/oj/eng>.

<sup>4</sup> European Commission, *Just Transition funding sources*, n.d., [https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/finance-and-green-deal/just-transition-mechanism/just-transition-funding-sources\\_en](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/finance-and-green-deal/just-transition-mechanism/just-transition-funding-sources_en).

The Just Transition Fund's budget that is financed through NextGenerationEU (approximately 57%) must be committed and distributed at a programme level by the end of 2026.<sup>5</sup>

The Commission has provided regions with technical and advisory support under various dedicated technical assistance schemes such as START,<sup>6</sup> JTP Groundwork<sup>7</sup> and JTPeers Exchange,<sup>8</sup> or the joint European Commission-European Investment Bank facility TARGET.<sup>9</sup> These initiatives aim to support such needs as, e.g.:

- project identification and development,
- capacity-building for regional and local administrations,
- building governance mechanisms for TJTP implementation,
- ensuring stakeholder engagement and mobilisation,
- and deployment of awareness-raising campaigns or engagement in cross-border cooperation with other transition regions.<sup>10</sup>

Other EU Cohesion funds that can support the energy transition include the European Regional Development Fund (ERDF) and the European Social Fund Plus (ESF+).

- **the ERDF** aims to reduce economic, social, and territorial disparities across all EU regions by enabling investments in infrastructure, empowering innovation, and supporting their competitiveness and resilience,<sup>11</sup>
- **the ESF+** focuses on fostering employment, social inclusion, skills, education, and reducing inequalities.<sup>12</sup>

Member States may, on a voluntary basis, relocate parts of their national ERDF and ESF+ allocations to the JTF, provided the total transferred amount does not exceed three times the JTF allocation.<sup>13</sup>

The Modernisation Fund complements the ERDF and ESF+, by directing revenues from the EU Emissions Trading System (EU ETS) to modernise energy systems and improve energy efficiency in 13 lower-income EU Member States, including Czechia, Greece, Poland, and Romania.<sup>14</sup>

Combining the three EU financial instruments is possible, provided that state aid rules are respected, and there is no double funding for the same causes.<sup>15</sup> Nevertheless, the JTF is the most geographically and thematically narrow, and is the only EU financial instrument that supports in a dedicated manner the territories that would be most affected by the transition toward climate neutrality. In addition, it is important to note that the possible use of ESF+, ERDF, and MF for just transition purposes has not been utilised in practice to a significant extent, as described in some of the chapters of this report. However, it was beyond the scope of this publication to fully analyse the extent to which the JTF has been supplemented and supported by these funding streams; thus, comments on this aspect are only mentioned in some chapters.

5 European Parliament, *Just Transition Fund*, <https://www.europarl.europa.eu/factsheets/en/sheet/214/just-transition-fund-jtf>.

6 European Commission, *START Technical Assistance to Regions in Transition*, n.d., [https://energy.ec.europa.eu/topics/clean-energy-transition/eu-coal-regions-transition/start-technical-assistance\\_en](https://energy.ec.europa.eu/topics/clean-energy-transition/eu-coal-regions-transition/start-technical-assistance_en).

7 European Commission, *About JTP Groundwork*, n.d., [https://ec.europa.eu/regional\\_policy/funding/just-transition-fund/just-transition-platform/supportground\\_en](https://ec.europa.eu/regional_policy/funding/just-transition-fund/just-transition-platform/supportground_en).

8 European Commission, *Just Transition Platform Experts & Exchange - About JTPeers*, n.d., [https://ec.europa.eu/regional\\_policy/funding/just-transition-fund/just-transition-platform/jtpeers-experts-exchange\\_en](https://ec.europa.eu/regional_policy/funding/just-transition-fund/just-transition-platform/jtpeers-experts-exchange_en).

9 European Investment Bank, *TARGET (Technical Assistance for Regions Undergoing a Green Energy Transition)*, n.d., <https://www.eib.org/en/products/advisory-services/target/index>.

10 European Commission, *Just Transition Mechanism - Performance*, n.d., [https://commission.europa.eu/strategy-and-policy/eu-budget/performance-and-reporting/programme-performance-statements/just-transition-mechanism-performance\\_en](https://commission.europa.eu/strategy-and-policy/eu-budget/performance-and-reporting/programme-performance-statements/just-transition-mechanism-performance_en).

11 European Commission, *European Regional Development Fund (ERDF)*, n.d., [https://commission.europa.eu/funding-tenders/find-funding/eu-funding-programmes/european-regional-development-fund-erdf\\_en?](https://commission.europa.eu/funding-tenders/find-funding/eu-funding-programmes/european-regional-development-fund-erdf_en?)

12 European Commission, *What is the ESF+ (European Social Fund Plus)*, n.d., <https://european-social-fund-plus.ec.europa.eu/en/what-esf>.

13 European Commission, *Just Transition funding sources*, n.d., *op.cit.*

14 European Commission, *Modernisation Fund*, n.d., [https://climate.ec.europa.eu/eu-action/eu-funding-climate-action/modernisation-fund\\_en](https://climate.ec.europa.eu/eu-action/eu-funding-climate-action/modernisation-fund_en).

15 *Ibidem*.

## 1.2. Why is it important to discuss the future of JTF?

On 16 July 2025, the European Commission presented a proposal for a new long-term EU budget for 2028–2034, stated to amount to nearly €2 trillion, which would then be negotiated by the European Parliament and the Member States.

The proposal consolidates spending programmes into a smaller number of policy-focused pillars, which means that the Just Transition Fund will be discontinued. Taking into account the effort that has been made to establish the JTF, and the hope for a better future it built within the societies in the regions, we want to engage in a discussion on constructive solutions that can be implemented to continue supporting regions in transition and avoid disappointment among citizens living in these territories.

A dedicated funding stream is still needed because transformation processes, particularly those linked to coal phase-outs and their social, economic, employment-related, and environmental impacts, will be felt for decades. In many countries, including Poland, Romania, Czechia and Germany, transformation/decarbonisation will not be completed by the end of the current financial perspective.

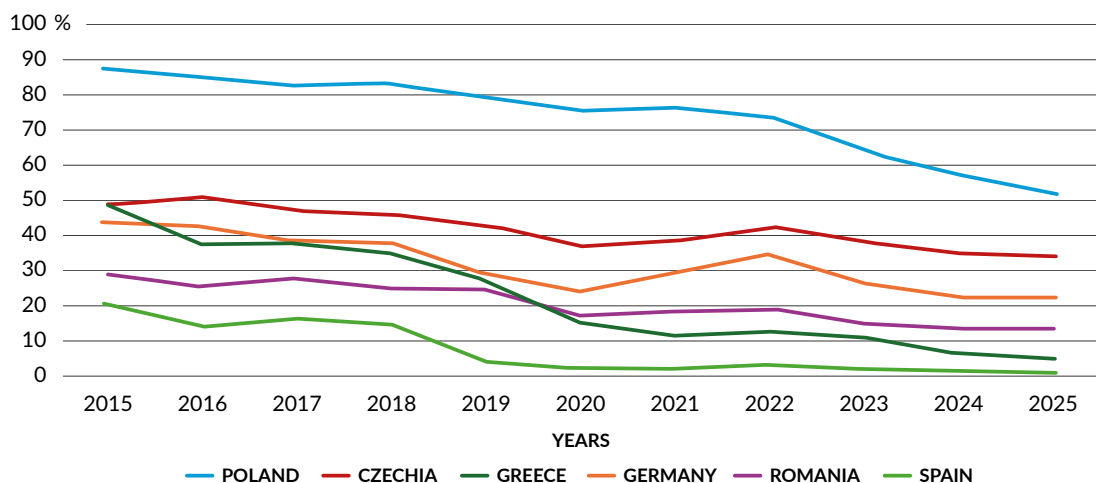
## 1.3. Methodology and country selection criteria

This publication has been developed based on a literature review, a series of in-depth interviews in each country with just transition experts from both public and civil society sectors, fact checking and referring to current drafts of the European Commission's Multiannual Financial Framework 2028–2034 proposal. The data regarding the JTF allocations decided, contracted and spent, presented in tables in each of the country chapters, has been based on the latest available data on the Open Cohesion Data Portal, with information covering the period up to 31 October 2025 (in the case of Czechia, Greece, Romania, Spain) and 31 December 2025 (for Germany and Poland).

This report examines how the Just Transition Fund currently functions and what effects it brings by analysing six geographically diverse countries – Czechia, Germany, Greece, Poland, Romania, and Spain – that represent different JTF governance models, funding management systems, and public participation processes. For the sake of clarity, countries have been presented alphabetically.

Each of the selected countries also has extensive needs in terms of the energy transformation process (the impacts of which the JTF is meant to be mitigating). However, these countries differ significantly in how the transition is proceeding and the consequences it is having on their energy mixes and directly on the regions.

Figure 1. Share of coal in electricity generation between 2015 and 2025 across the six analysed countries



Source: Energy-Charts, *Public net electricity generation in Czech Republic, Germany, Greece, Poland, Romania, Spain in 2015-2025, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=EU](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=EU).

The graph above illustrates the rapid decline in the share of coal-based electricity generation over the past 10 years. This trend is closely linked to the design of the EU's just transition process – through the mandatory reduction schedules included in Territorial Just Transition Plans, it has facilitated the coal phaseout.<sup>16</sup>

#### 1.4. Publication contents

Each chapter on a country is divided into an introduction, containing basic information about the national energy mix and just transition process, as well as three main subsections:

1. **Governance and financing** – identifying the main characteristics of the governance model and just transition management, the country allocations and spending rates.
2. **Public participation** – outlining the level of participation within the JTF process, stakeholders involved and participatory mechanisms in place.
3. **JTF at a glance** – summarising the country's chapter, providing an overview of the main takeaways from the JTF implementation and initial recommendations gathered from desk research and in-depth interviews.

For this publication to present some tangible results of the just transition process, a few projects of a transformative nature financed through the Just Transition Fund have been selected to demonstrate the wide range of areas of intervention and its broad impact on local communities.

The publication ends with a set of recommendations on the future of just transition funding. Regardless of whether the Just Transition Fund remains a separate funding stream in the next EU Multiannual Financial Framework or is integrated into other policy and financial instruments, the aim of this publication is to underline that it is crucial to secure a dedicated, earmarked allocation for regions undergoing energy transition. Such continuity should be maintained despite any difficulties or challenges the just transition process has faced, which is also further highlighted in the recommendation section of this publication.

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## 2. Czechia

Over the past decade, Czechia has seen a significant reduction in the share of coal in its electricity generation mix. Coal accounted for 49% of electricity generation in 2015,<sup>17</sup> but by 2025 this had declined to 34%, with 22.98 TWh coming from lignite and 0.75 TWh from hard coal.<sup>18</sup> This decrease has been accompanied by a rise in nuclear energy, which in 2025 became the country's dominant electricity source at 43%.<sup>19</sup> At the same time, the installed capacity of renewable energy sources has continued to expand, even though the share of renewables in the electricity generation mix (17% in 2025<sup>20</sup>) is far from achieving its potential. Solar electricity generation reached approximately 4.71 TWh, representing a 20% increase compared with 2024.<sup>21</sup>

<sup>16</sup> CEE Bankwatch Network, *Mapping the road to a just transition in central and eastern Europe: an analysis of Territorial Just Transition Plans in 7 countries. part I*, 2023, <https://bankwatch.org/publication/mapping-the-road-to-a-just-transition-in-central-and-eastern-europe-an-analysis-of-territorial-just-transition-plans-in-7-countries-september-2023-update-part-i>.

<sup>17</sup> Energy-Charts, *Public net electricity generation in Czech Republic in 2015*, 2026, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=CZ&interval=year&year=2015](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=CZ&interval=year&year=2015).

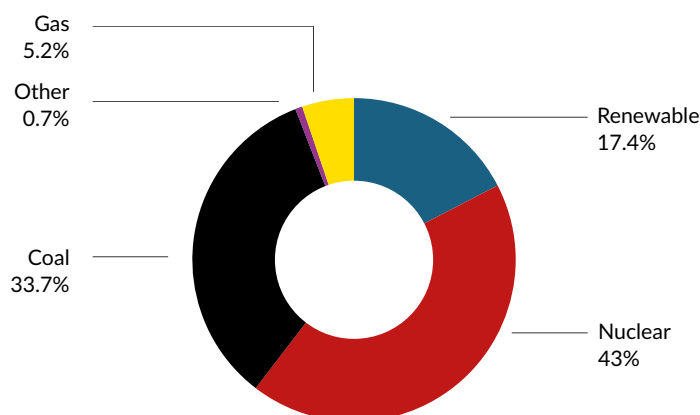
<sup>18</sup> Energy-Charts, *Public net electricity generation in Czech Republic in 2025*, 2026, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=CZ&interval=year&year=2025](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=CZ&interval=year&year=2025).

<sup>19</sup> *Ibidem*.

<sup>20</sup> *Ibidem*.

<sup>21</sup> *Ibidem*.

Figure 2. Czechia's electricity generation mix in 2025



Source: Energy-Charts, *Public net electricity generation in Czech Republic in 2025, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=CZ&interval=year&year=2025](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=CZ&interval=year&year=2025).

According to the 2015 energy strategy, Czechia aims to drop the share of coal in its electricity mix to 15.5% by 2040, with nuclear energy and renewables rising to 43.2% and 20.2%, respectively.<sup>22</sup> It should be noted that the first indications of coal phaseout dates in Czechia were provided in the TJTP, submitted to the European Commission at the end of 2022. Currently, the energy transition in Czechia is mostly driven by the 2023 National Energy and Climate Plan.<sup>23</sup>

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## 2.1. Financing and governance of the Czech just transition

There are three designated just transition lignite and hard coal regions in Czechia: Ústecký, Moravskoslezský and Karlovarský. All three are covered by one joint Territorial Just Transition Plan (TJTP), which was approved by the European Commission on 26 September 2022.<sup>24</sup> These regions face significant challenges within the energy transition process. Fifteen of the thirty largest CO<sub>2</sub> emitters<sup>25</sup> in the country (power plants, heating plants, ironworks, refineries) and one third of its post-industrial sites<sup>26</sup> are located in these regions. They are characterised by low Small and Medium Enterprise (SME) innovation performance,<sup>27</sup> significant population loss,<sup>28</sup> a low share of residents with higher education,<sup>29</sup> and the highest share of people at risk of poverty.<sup>30</sup>

There are still 4 active lignite mines in the country and the lignite phase-out process is to be completed by 2033.<sup>31</sup> The last hard coal mine operating in Czechia was closed at the end of January 2026.<sup>32</sup>

The total planned sum of money that has been allocated from the Just Transition Fund to Czechia currently amounts to EUR 1.64 billion (including a technical assistance part), which is the 4<sup>th</sup> highest allocation in the European Union (after Poland, Germany and Romania).

22 Ministry of Industry and Trade (Czech Republic), *State Energy policy of Czech Republic*, 2014, [https://mpo.gov.cz/assets/en/energy/state-energy-policy/2017/11/State-Energy-Policy-\\_2015\\_\\_EN.pdf](https://mpo.gov.cz/assets/en/energy/state-energy-policy/2017/11/State-Energy-Policy-_2015__EN.pdf).

23 European Commission, *Czechia - Final updated NECP 2021-2030 (submitted 2024)*, 2024, [https://commission.europa.eu/publications/czechia-final-updated-necp-2021-2030-submitted-2024\\_en](https://commission.europa.eu/publications/czechia-final-updated-necp-2021-2030-submitted-2024_en).

24 Ministry of Regional Development of the Czech Republic, *Plan of Just Territorial Transformation*, 2022, [https://dotaceeu.cz/getmedia/70636969-9d91-49ae-b41d-af4b5027234e/PSUT-dokument\\_2.pdf.aspx](https://dotaceeu.cz/getmedia/70636969-9d91-49ae-b41d-af4b5027234e/PSUT-dokument_2.pdf.aspx).

25 Fakta o klimatu, *Fakta o změně klimatu*, 2026, <https://faktaoklimatu.cz/>.

26 CzechInvest, *Seznam brownfieldů*, 2026, <https://brownfieldy.czechinvest.org/Aplikace/bf-public-x.nsf/bfs.xsp>.

27 European Commission, *Regional innovation scoreboard*, 2025, [https://research-and-innovation.ec.europa.eu/statistics/performance-indicators/regional-innovation-scoreboard\\_en/](https://research-and-innovation.ec.europa.eu/statistics/performance-indicators/regional-innovation-scoreboard_en/).

28 Český statistický úřad, *Statistiky*, 2026, <https://csu.gov.cz/>.

29 *Ibidem*.

30 Mapa Zadlužení, *Podíl osob v exekuci po ORP (Q3 2025)*, n.d., [https://mapazadluzeni.cz/?v1=podil\\_osob\\_v\\_exekuci&v1p=2025-Q3](https://mapazadluzeni.cz/?v1=podil_osob_v_exekuci&v1p=2025-Q3).

31 European Commission, *EU Cohesion Policy: €1.64 billion for a just climate transition in Czechia*, 26 September 2022, [https://ec.europa.eu/regional\\_policy/whats-new/newsroom/26-09-2022-eu-cohesion-policy-eur1-64-billion-for-a-just-climate-transition-in-czechia\\_en](https://ec.europa.eu/regional_policy/whats-new/newsroom/26-09-2022-eu-cohesion-policy-eur1-64-billion-for-a-just-climate-transition-in-czechia_en).

32 R. Stoklasa, J. Lopatka, *Last Czech deep coal mine closes as centuries-old industry reaches final day*, Reuters, 2026, <https://www.reuters.com/sustainability/climate-energy/last-czech-deep-coal-mine-closes-centuries-old-industry-reaches-final-day-2026-01-16/>.

Of this total, 46% will be allocated to Moravskoslezský, 39% to Ústecký and 15% to Karlovarský. The distribution of the regional allocations was based on the number of inhabitants, GDP, unemployment rate, the surface affected by mining, and Research & Development employment. Czechia has a relatively good level of allocated funds (81.8%) and a slightly above average level of money spent (8.8%).<sup>33</sup> The JTF distribution for Czechia is presented in the table below.

Table 1. Czechia's Just Transition Fund distribution

| CZECHIA'S JUST TRANSITION FUND DISTRIBUTION |                       |                     |                 |                    |               |
|---|-----------------------|---------------------|-----------------|--------------------|---------------|
| REGION                                      | ALLOCATION* (MLN EUR) | DECIDED** (MLN EUR) | DECIDED (SHARE) | SPENT*** (MLN EUR) | SPENT (SHARE) |
| Karlovarský kraj                            | 241.1                 | 220.0               | 91.3%           | 11.3               | 4.7%          |
| Moravskoslezský kraj                        | 726.5                 | 621.4               | 85.5%           | 76.5               | 10.5%         |
| Ústecký kraj                                | 608.3                 | 448.0               | 73.7%           | 32.6               | 5.4%          |
| Technical Assistance                        | 65.7                  | 53.9                | 82.0%           | 24.7               | 37.6%         |

Source: European Commission, *Cohesion Open Data Platform, Just Transition Fund, 2021-2027, Finances: Implemented, 2025*, <https://cohesiondata.ec.europa.eu/funds/jtf/21-27#finance-implementation>.

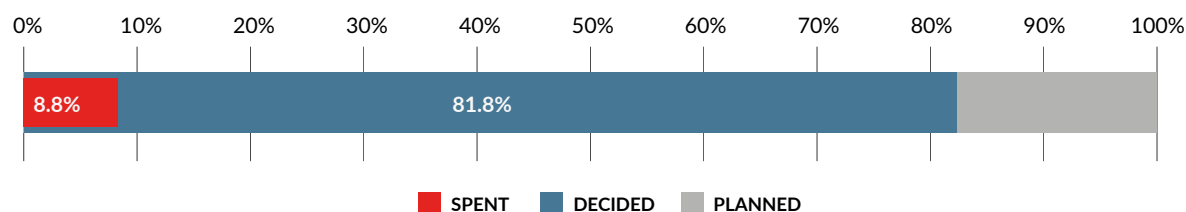
\* The total amount assigned to a Member State for 2021-2027.

\*\* The portion of the allocation for which contracts or financing decisions have been approved by authorities; resources are committed to specific projects but not yet disbursed.

\*\*\* The portion of the allocation that has been disbursed.

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Figure 3. Implementation of the Just Transition Fund in Czechia



Source: European Commission, *Cohesion Open Data Platform, Just Transition Fund, 2021-2027, Finances: Implemented, 2025*, <https://cohesiondata.ec.europa.eu/funds/jtf/21-27#finance-implementation>.

The planned allocation dedicated to specific policies is as follows:<sup>34</sup>

- economic policies<sup>35</sup> (19% of the total Czechia JTF allocation) – ca. 14% SME's, 5% large companies, 0% employment,
- environmental policies<sup>36</sup> (17%) – ca. 6% RES-based energy, 11% land development and other environmental projects,
- social policies<sup>37</sup> (55%) – ca. 18% Research, Development and Investments (R&D&I) in public sectors, 22% education (not retraining or upskilling), 4% territorial development, 10% culture and tourism, 1% social issues,
- other – 9%.

The allocation shows a clear predominance of broadly defined social expenditures. However, no funding for job replacement and direct creation of new jobs in the business sector as well as the lack of allocation to retraining and upskilling purposes have been significant concerns. This suggests that people from mining and energy are expected to find employment in other sectors, particularly in those which shall develop due to high JTF allocation to small and medium enterprises and the research, development and investment sector.

In the opinion of representatives of civil society, the Czech JTF has not been effectively integrated with other funding sources, such as the Modernisation Fund or national financing schemes, leading to missed opportunities for synergy.<sup>38</sup>

The Ministry, however, emphasises that the respective funding instruments are designed to complement and build on each other. For example, as the Modernisation Fund (MF) has had significantly more resources available to it than the JTF, it was decided that the majority of support for the energy transition should be financed from the MF and that only selected strategic JTF projects should focus on this topic. Coal regions were, however, given a scoring advantage in some calls (e.g. photovoltaic calls). It was stated that in certain specific calls, at least 30% of the allocation would be directed to the three JT regions to ensure that support for transformation-related activities should be sufficiently targeted.<sup>39</sup>

The governance of the Just Transition Fund in the Czech Republic has been split between two ministries: the Ministry for Regional Development, which has been responsible for the preparation of TJTP and the Ministry for the Environment, which has managed the implementation phase. This division has created complications, as decisions made during the planning phase have significantly impacted later implementation, with little flexibility existing to adjust the approach.<sup>40</sup>

34 CEE BankWatch, *Following The Money: Czech Republic*, 2023, <https://bankwatch.org/publication/following-the-money-czech-republic>; European Commission, Cohesion Open Data Platform – Just Transition Fund (JTF) 2021–2027, Finances:Planned, 2025, <https://cohesiondata.ec.europa.eu/funds/jtf/21-27>.

35 Economic policies include measures that directly support the private sector or improve employment conditions. This category covers investments in small and medium-sized enterprises (SMEs), workforce retraining and upskilling, support for large businesses, and employment initiatives benefiting companies and individuals.

36 Environmental policies include measures aimed at improving environmental conditions, such as expanding renewable energy production and remediating contaminated brownfield sites.

37 Social policies include measures that improve public and community conditions in regions, benefiting broad population groups. They cover investments in healthcare and social services, general education (excluding retraining or upskilling), and public research organisations.

38 Source: interview with Zuzana Vondrová, Project Coordinator, Centre for Transport and Energy; CEE Bankwatch, *Keeping the flame alive with emission revenues, How the EU Modernisation Fund props up fossil gas and waste incineration*, 2025, p. 17, <https://bankwatch.org/wp-content/uploads/2025/04/Modernisation-Fund-Report-2025.pdf>, which indicates that so far only one Czech MF project was framed as supporting just transition, i.e., the construction of shore-side electricity (SSE) infrastructure to provide grid electricity to an LNG terminal.

39 Source: interview with Radana Leistner Kratochvílová, Support for a Low-Carbon Economy Transition Department, Ministry of the Environment, Czechia.

40 Source: interview with Zuzana Vondrová, *op.cit.*

The JTF is implemented through one national TJTP, divided into three regional priorities, one for each designated area. Each region has its own budget envelope. Regional governments play an active role through regional platforms (called Regional Standing Conferences), which have significant influence over project selection and decision-making. The regions have been and remain a key partner for the Ministry of Environment and have a decisive say in the allocation of resources.<sup>41</sup> At the same time, however, smaller municipalities and local mayors have been largely excluded from these discussions, despite their deep understanding of local needs.

In terms of financing, the model features a diversified financial structure:

- around 50% of the funds go to strategic projects identified by Regional Standing Conferences,
- the rest supports thematic calls, small grants schemes (vouchers for SMEs and municipalities), and financial instruments (loans, guarantees, blended finance for brownfield regeneration and SME development).

The first half of the funds have been allocated to large strategic projects (flagship projects), often benefiting universities, large enterprises, and industrial players. The selection process for these projects has been reportedly criticised for its lack of transparency, as key decisions were made early in the process without public input.<sup>42</sup> The Ministry, however, maintains that while indeed the time given for the projects to apply was rather short, nonetheless there was a second round where more time and funding for the preparation of necessary documentation was provided. This was accompanied by working groups and debates at the Regional Standing Conferences.<sup>43</sup> There is no dispute that smaller projects and open calls had a clearer consultation process, but their influence on the overall transition strategy has been smaller.<sup>44</sup>

## 2.2. Project to follow

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### The Střimická výsypka Bird Park project

The landscape of the Most region has largely been shaped by mining activities carried out over the past century. Lignite mining has fundamentally transformed the landscape in all its aspects, from geological and environmental factors to social and cultural. The new landscape, which has been created on top of former mining pits and tailing piles, is devoid of many valuable natural elements. The current appearance of the Střimice pit is the result of technical reclamation, which has taken place in the area since the 1960s in several stages and with varying degrees of success. The reclamations have focused on creating productive forest and agricultural land; the issue of promoting natural diversity has not been addressed at all.

The aim of the Střimická výsypka Bird Park project has been to restore valuable natural habitats in reclaimed areas after the closure of lignite mining near the town of Most. Following the acquisition of 251 ha of land by the Czech Ornithological Society, activities to promote biodiversity in forest, non-forest and aquatic habitats have been initiated.

At the time of publishing this report, the project had been implemented (from December 2024 to December 2025) and had received 90% of its funding from the JTF.<sup>45</sup>

41 Source: interview with Radana Leistner Kratochvílová, *op.cit.*

42 Source: interview with Zuzana Vondrová, *op.cit.*

43 Source: interview with Radana Leistner Kratochvílová, *op.cit.*

44 *Ibidem.*

45 BirdLife Czech (Czech Society for Ornithology), *Ptačí park Střimická výsypka*, 2025, <https://www.birdlife.cz/rezervace/strimicka-vysypka/>.

### 2.3. Public participation in the process

The assessment of public participation seems to vary depending on the stakeholders evaluating the process. The participation mechanisms have been relatively well structured and evolving in the right direction.<sup>46</sup> A Transition Platform was created at the planning phase, gathering around 30 stakeholders from regions and national levels. Around 80% of Transition Platform members later entered the Monitoring Committee, which continues to oversee the implementation of the Fund. Moreover, nine thematic working groups (e.g. for employment, education, and strategic projects) were established to support the preparation of calls within the Fund.<sup>47</sup>

Civil society, on the contrary, has criticised the weaknesses of the participation process, which has excluded important stakeholders, lacked information regarding the selection process of strategic projects and contained gaps in strategic planning.<sup>48</sup> The role of the Transition Platform established to oversee the planning process has been largely consultative, with limited influence over key decisions. Civil society organizations (CSOs) and NGOs have minor representation in this body and have often been presented with already finalised documents rather than being included in the early-stage discussions. The established working groups have offered a more structured platform for expert input, but key decisions about strategic projects have typically already been made, limiting the impact of later consultations. Transparency has also been a major concern, particularly regarding how funding has been allocated and which projects have been prioritised.<sup>49</sup>

Targeted financing under dedicated funding has been ensured and has provided focused support for education and youth at risk. However, the Czech JTF has failed to concentrate on vulnerable communities and the energy poverty in these regions and has missed the opportunity to improve regional social stability mechanisms.<sup>50</sup>

### 2.4. The Czech JTF at a glance

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The stakeholders' experiences have led us to conclude that many aspects of the JTF and its implementation in the Czech Republic could work better.<sup>51</sup> The tight time-frame and pressure to move quickly have compromised quality and proper project development. Country institutions face capacity limitations at both managing authorities and regional levels, while state aid rules have caused delays and administrative hurdles. From a civil society perspective, future JTF programs should strengthen the social dimension and ensure the greater involvement of local communities. Mayors and local civil society representatives should have a greater role in shaping transition plans and selecting projects. Decision-making processes, particularly for large strategic projects, should be more transparent and include meaningful public consultations.

If flagship projects<sup>52</sup> continue to receive significant funding, clearer selection criteria, stronger public scrutiny, and a focus on projects that genuinely contribute to regional transformation are essential. It is also expected that the JTF should not focus solely on economic revitalisation through industry and infrastructure but should also invest in education, social services, and community well-being.

Despite the above reservations, our interviewees agree that the JTF remains a crucial tool for supporting coal-dependent regions in the Czech Republic. The Fund should be maintained in the next Multiannual Financial Framework (after 2027) and should be kept as one dedicated operational programme (not fragmented across different funds).

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46 Source: interview with Radana Leistner Kratochvílová, *op.cit.*

47 Operační program Spravedlivá transformace, *About the Programme*, n.d., <https://opst.cz/about-the-programme>.

48 Source: interview with Zuzana Vondrová, *op.cit.*

49 Z. Vondrova, *Czech Republic: Lessons learned from the Just Transition Fund*, Just Transition, 2024, <https://www.just-transition.info/czech-republic-lessons-learned-from-the-just-transition-fund/>.

50 *Ibidem*.

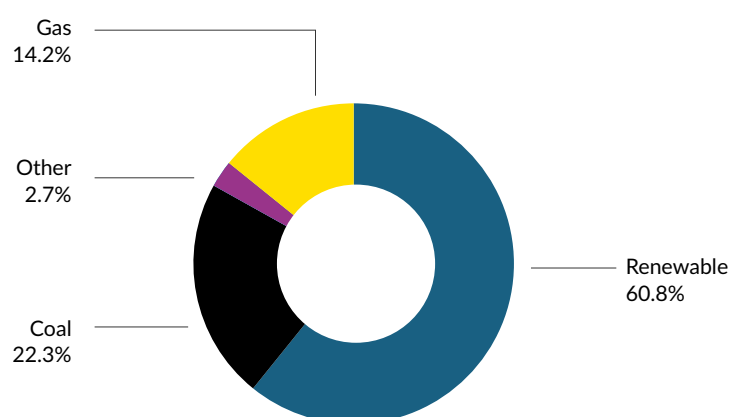
51 Source: interview with Radana Leistner Kratochvílová, *op.cit.*

52 Large strategic projects (accounting for half of all the allocated funds), often benefiting universities, large enterprises and industrial players.

### 3. Germany

Germany remains the EU's top producer of electricity from coal. In 2025, it generated 67 TWh from lignite and 27 TWh from hard coal.<sup>53</sup> The decline in Germany's coal electricity generation is evident – in 2015, 45% of electricity was generated from coal,<sup>54</sup> whereas by 2025 it had dropped to 22%.<sup>55</sup> In 2025, renewables accounted for 61% of electricity generation with onshore wind as a dominant source (25%).<sup>56</sup>

Figure 4. Germany's electricity generation mix in 2025



Source: Energy-Charts, *Public net electricity generation in Germany in 2025, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=DE&interval=year&year=2025](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=DE&interval=year&year=2025).

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Germany's just transition process is largely driven by a robust national framework called *Energiewende*.<sup>57</sup> It is operationalised through documents such as *the Act to Reduce and End Coal-Fired Power Generation*, which was adopted in 2020<sup>58</sup> and which indicates that the last coal-fired power station in Germany will be closed no later than 2038.<sup>59</sup> Interestingly, the state of North Rhine-Westphalia has set a separate deadline of 2030 for the coal power phase-out at the regional level.<sup>60</sup>

53 Energy-Charts, *Public net electricity generation in Germany in 2025, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=DE&interval=year&year=2025](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=DE&interval=year&year=2025).

54 Energy-Charts, *Public net electricity generation in Germany in 2015, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=DE&interval=year&year=2015](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=DE&interval=year&year=2015).

55 Energy-Charts, *Public net electricity generation in Germany in 2025, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=DE&interval=year&year=2025](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=DE&interval=year&year=2025).

56 J. Wójcik, *Forum Energii, 2025\_ wrapped od Forum Energii, czyli błyskawiczny przegląd najciekawszych danych z zakresu elektroenergetyki z 2025 r., 2026*, [https://www.forum-energii.eu/2025\\_wrapped](https://www.forum-energii.eu/2025_wrapped).

57 Federal Foreign Office, *The German Energiewende: Transforming Germany's energy system*, n.d., <https://www.auswaertiges-amt.de/resource/blob/610620/5d9bfec0ab35695b9db548d10c94e57d/the-german-energiewende-data.pdf>.

58 *Gesetz zur Reduzierung und zur Beendigung der Kohleverstromung (Kohleverstromungsbeendigungsgesetz – KVVBG)*, 8 August 2020 (BGBl. I, p. 1818), most recently amended by Article 7 of the Act of 21 February 2025, <https://www.gesetze-im-internet.de/kvbg/BJNR181810020.html>.

59 The Federal Government, *FAQs to ending the use of coal - Ending coal-generated power*, n.d., Bundesregierung beschließt Kohleausstiegsgesetz, <https://www.bundesregierung.de/breg-en/service/archive/kohleausstiegsgesetz-1717014>.

60 Agora Energiewende, *What are Germany's nuclear, coal and fossil gas phase-out strategies?*, 2025, <https://www.agora-energiewende.org/about-us/the-german-energiewende/what-are-germanys-nuclear-coal-and-fossil-gas-phase-out-strategies>.

### 3.1. Financing and governance of the German just transition

Germany is the second largest Just Transition Fund beneficiary (after Poland)<sup>61</sup> and is set to receive EUR 2.5 billion to support four regions affected by the coal phase-out. Eight identified territories (on the NUTS3 level<sup>62</sup>), located in (1) Brandenburg, i.e. Schwedt/Oder (Uckermark) and the Lusatian Mining Region; (2) North Rhine-Westphalia, i.e., the Rheinisches Revier and Northern Ruhr areas; (3) Saxony, i.e. also covering the Lusatian Mining Region as in point 1, the independent city of Chemnitz and the Central German Mining Area; and (4) Saxony-Anhalt, also covering the Central German Mining area, are to receive EUR 785 million, 680 million, 645 million, and 364 million, respectively.<sup>63</sup>

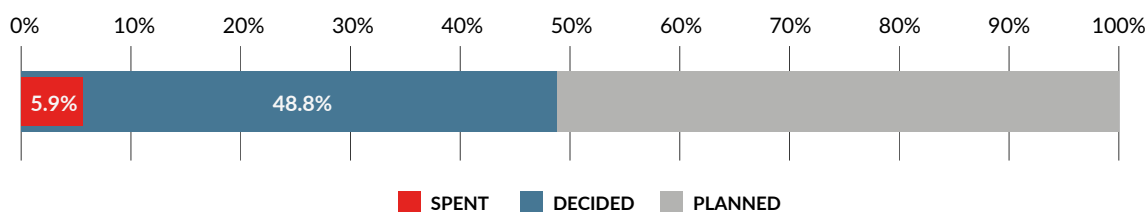
Table 2. Germany's Just Transition Fund distribution

| GERMANY'S EU JUST TRANSITION FUND DISTRIBUTION |                            |                   |                 |                 |               |
|--|----------------------------|-------------------|-----------------|-----------------|---------------|
| REGION   | GRANT ALLOCATION (MLN EUR) | DECIDED (MLN EUR) | DECIDED (SHARE) | SPENT (MLN EUR) | SPENT (SHARE) |
| Brandenburg                                    | 122 437 227                | 679 279 830       | 60.5%           | 74 879 575      | 6.7%          |
| North Rhine-Westphalia                         | 826 010 372                | 246 336 092       | 29.5%           | 8 820 175       | 1.1%          |
| Saxony   | 1 030 225 385              | 499 757 698       | 48.5%           | 122 111 650     | 11.9%         |
| Saxony-Anhalt                                  | 520 122 038                | 351 708 739       | 67.6%           | 11 114 492      | 2.1%          |

Source: European Commission, *2021-2027 Finances Detailed Planned vs Implemented (timeseries)*, Cohesion Open Data Platform, 2024, [https://cohesiondata.ec.europa.eu/2021-2027/2021-2027-Finances-Detailed-Planned-vs-Implemented/3git-md5z/about\\_data](https://cohesiondata.ec.europa.eu/2021-2027/2021-2027-Finances-Detailed-Planned-vs-Implemented/3git-md5z/about_data).

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Figure 5. Implementation of the Just Transition Fund in Germany



Source: European Commission, *Cohesion Open Data Platform, Just Transition Fund, 2021-2027, Finances: Implemented, 2025*, <https://cohesiondata.ec.europa.eu/funds/jtf/21-27#finance-implementation>.

It is important to note that, out of the total allocation, only 48.8% of projects have been decided, with Saxony-Anhalt leading at 67.6%, Brandenburg 60.5%, Saxony 48.5%, and North Rhine-Westphalia having only 29.5% of its projects decided. Only 5.9% of the funds have been spent, with Saxony reaching 11.9%, Brandenburg 6.7%, Saxony-Anhalt 2.1% and North Rhine-Westphalia 1.1%.<sup>64</sup>

61 European Commission, *Speech (by video message) by Commissioner Elisa Ferreira at the launch event for the Germany 2021-2027 JTF programmes, 2022*, [https://ec.europa.eu/commission/presscorner/detail/en/SPEECH\\_22\\_6337](https://ec.europa.eu/commission/presscorner/detail/en/SPEECH_22_6337).

62 Eurostat, *NUTS - Nomenclature of territorial units for statistics. Overview, 2026*, <https://ec.europa.eu/eurostat/web/nuts>.

63 V. Cirillo, M. Divella, E. Ferrulli & L. Greco, *Active Labor Market Policies in the Framework of Just Transition Programs: the Case of Italy, Spain, and Germany*, OeFSE Working Paper 79, 2024, <https://doi.org/10.60637/2024-wp79>.

64 European Commission, *2021-2027 Finances Detailed Planned vs Implemented (timeseries)*, [https://cohesiondata.ec.europa.eu/2021-2027/2021-2027-Finances-Detailed-Planned-vs-Implemented/3git-md5z/about\\_data](https://cohesiondata.ec.europa.eu/2021-2027/2021-2027-Finances-Detailed-Planned-vs-Implemented/3git-md5z/about_data).

The planned allocation for the JTF in Germany is structured as follows:<sup>65</sup>

- economic policies (59% of the Fund) – ca. 40% SMEs, 9% large companies, 10% retraining/upskilling, 0% employment,
- environmental policies (13%) – ca. 7% RES-based energy, 2% land restoration and 4% other environmental projects,
- social policies (11%) – ca. 8% R&D&I in public sectors, 3% education,
- other – 17%.

The German JTF allocation is dedicated mainly to economic activities. Notably, support for small and medium-sized enterprises is the highest among the countries analysed in this publication.

However, the EU's Just Transition Fund plays a secondary role in financing Germany's energy transition. In 2020, the German federal government adopted the *Structural Strengthening Act, including the Investment Act for Mining Areas*, providing EUR 41.09 billion in support for coal regions until 2038.<sup>66</sup> EUR 26 billion will be managed by the federal government in collaboration with the affected states, while EUR 14 billion will be used directly by the territories to invest in business-related infrastructure, public transport, transport infrastructure, and high-speed internet. Moreover, EUR 1.09 billion is earmarked for economically weaker municipalities that have been reliant on hard coal power generation.<sup>67</sup>

In some regions, JTF funding has been incorporated into multi-fund operational programs, namely ERDF/JTF and ESF+/JTF respectively.

Germany applies a decentralised approach to the governance of the Just Transition Fund with different managing authorities tasked with coordinating the JTF implementation in each of the subregions.<sup>68</sup>

**Table 3. Overview of German Managing Authorities of the Just Transition Fund**

| REGION                 | MANAGING AUTHORITY  |
|------------------------|---|
| Brandenburg            | Ministry for Economic Affairs, Labour and Energy of the State of Brandenburg                              |
| North Rhine-Westphalia | Ministry for Economic Affairs, Industry, Climate Action and Energy of the State of North Rhine-Westphalia |
| Saxony                 | Saxon State Ministry for Economic Affairs, Labour and Transport   |
| Saxony-Anhalt          | Ministry of Finance of the State of Saxony-Anhalt   |

Source: European Commission, *Managing Authorities – Germany*, n.d., [https://ec.europa.eu/regional\\_policy/in-your-country/managing-authorities/germany\\_en](https://ec.europa.eu/regional_policy/in-your-country/managing-authorities/germany_en).

<sup>65</sup> European Commission, *Cohesion Open Data Platform, Just Transition Fund (JTF), Finances: Planned (2021–2027)*, op.cit.

<sup>66</sup> Federal Ministry for Economic Affairs and Climate Action (Germany), *Strukturstärkungsgesetz Kohleregionen*, n.d., <https://www.bundeswirtschaftsministerium.de/Redaktion/DE/Textsammlungen/Wirtschaft/strukturstärkungsgesetz-kohleregionen.html>.

<sup>67</sup> Agora Energiewende, *What are Germany's nuclear, coal and fossil gas phase-out strategies?*, op.cit.

<sup>68</sup> European Commission, *Managing Authorities – Germany*, n.d., [https://ec.europa.eu/regional\\_policy/in-your-country/managing-authorities/germany\\_en](https://ec.europa.eu/regional_policy/in-your-country/managing-authorities/germany_en).

The JTF supports different interventions across Germany tailored to the specific needs of each subregion. The current situation, as well as the subregions' goals and objectives to be achieved with the help of the Just Transition Fund, have been identified in six separate TJTPs:

- In Schwedt/Oder (Brandenburg), the focus is on fostering new business opportunities, developing digital skills trainings, and creating dedicated innovation hubs and spaces, as the region is attempting to reinvent itself following the closure of the PCK Raffinerie GmbH (PCK Refinery Ltd.) that had been a dominant force in the local economy.<sup>69</sup>
- The Lausatian Mining Region, spanning both Brandenburg and Saxony, is attempting to boost employment in sustainable industries (including renewable energy generation) to replace up to as much as 9 thousand direct lignite jobs lost, while at the same time discouraging young, skilled workers from leaving the area.<sup>70</sup>
- Similarly, Chemnitz in Saxony, which recently saw the closure of a lignite-fired power plant, prioritises diversifying the economy, offering vocational trainings and upgrading workers' skills and qualifications for future-proof jobs, improving infrastructure and public transport.<sup>71</sup>
- The Central German Mining Area, spanning Saxony and Saxony-Anhalt, currently faces steep job losses; thus, it places high emphasis on industrial efficiency and new investments that would make the region more attractive to workers and their families.<sup>72</sup>
- Finally, the North Rhine-Westphalia's Rheinisches Revier TJTP focuses on supporting SMEs through the "Future Vouchers" initiative<sup>73</sup> and energy grid upgrades,<sup>74</sup> while in the Northern Ruhr region, the aim is to transform former industrial sites, drive innovation in local enterprises, and equip workers with the new skills required by emerging sectors, such as renewable energy and related technologies, digital economy and Industry 4.0 (automation, data-driven manufacturing, IT services), as well as sustainable mobility.<sup>75</sup>

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69 State of Brandenburg, *Territorial Just Transition Plan for the Schwedt/Oder Refinery Region (TJTP Uckermark, EFRE/JTF Programme BB 21|27, version 4.0)*, 2025 (Lesefassung), [https://efre.brandenburg.de/sixcms/media.php/9/2025\\_01\\_16\\_TJTP%20UM\\_Lesefassung.pdf](https://efre.brandenburg.de/sixcms/media.php/9/2025_01_16_TJTP%20UM_Lesefassung.pdf).

70 State of Brandenburg, *Territorial Just Transition Plan for the Lusatia Region (TJTP Lausitz) EFRE/JTF-Programm BB 21|27, 2022* (Lesefassung), [https://efre.brandenburg.de/sixcms/media.php/9/2022\\_10\\_14\\_TJTP\\_Lausitz.pdf](https://efre.brandenburg.de/sixcms/media.php/9/2022_10_14_TJTP_Lausitz.pdf).

71 State of Saxony, *Territorial Just Transition Plan (TJTP) Saxony 2021-2027, 2022*, [https://www.strukturentwicklung.sachsen.de/download/TJTP\\_SMWA.pdf](https://www.strukturentwicklung.sachsen.de/download/TJTP_SMWA.pdf).

72 *Ibidem*.

73 A funding scheme supporting SMEs with up to 60% co-funding for consulting, hiring transformation experts, and investments in innovation, digitalisation, and energy efficiency.

74 State of North Rhine-Westphalia / EFRE NRW, *Territorial Plan for a Just Transition (TJTP) – Rhenish Region (version 3.0)*, 2021, [territorialer-plan-fur-einen-gerechten-ubergang-tjtp-rheinisches-revier.pdf](https://www.efre.nrw/sites/default/files/media/document/file/tjtp_noerdliches_ruhrgebiet_v3.pdf).

75 State of Brandenburg EFRE/NRW, *Territorial Plan for a Just Transition (TJTP) – Northern Ruhr Region (Version 3.0)*, 2021, [https://www.efre.nrw/sites/default/files/media/document/file/tjtp\\_noerdliches\\_ruhrgebiet\\_v3.pdf](https://www.efre.nrw/sites/default/files/media/document/file/tjtp_noerdliches_ruhrgebiet_v3.pdf).

### 3.2. A project to follow

#### Transformation and Service Centre (Tra:vis)

One of the JTF projects that deserves further recognition is the Transformation and Service Centre (Tra:vis) located in Schwedt (Oder), Brandenburg.<sup>76</sup> This initiative is the first building block of the Innovation Campus, which will serve as a hub for businesses, start-ups, research institutions, and civil society. Its core mission is to strengthen small and medium-sized enterprises, encourage innovation and collaboration, and, most importantly, help address the structural challenges the region is facing.<sup>77</sup>

With spaces for events and co-working, dedicated start-up areas, and a wide range of workshops, the Tra:vis aims to promote climate-neutral business ideas and create an environment for testing and showcasing the latest technological solutions.<sup>78</sup>

The Transformation and Service Centre will be fully operational by 2027. It has been awarded EUR 18.4 million and will be further equipped with JTF-backed elements, such as a real-world laboratory, a boarding house, and an advanced technical training centre.<sup>79</sup>

### 3.3. Public participation

Citizen engagement levels within the Just Transition scheme differ from region to region. Saxony-Anhalt appears to have in place the most advanced participatory mechanism. The State Chancellery and the Ministry of Culture has established a citizens' advisory council to include members of society in the structural change planning processes within the Central German Mining District, where Anhalt-Bitterfeld, Mansfeld-Südharz, Burgenlandkreis, Saalekreis, and the independent city of Halle are located. The Council is made up of randomly selected citizens, representing different ages, genders, and social groups.<sup>80</sup> In Saxony, stakeholder consultations have been conducted as part of the programme design, with municipalities, companies, and trade unions engaged in the JTF planning.<sup>81</sup> North Rhine-Westphalia has included a public consultation process in the subregion's Territorial Just Transition Plans (TJTP), especially for funding calls and regional planning.<sup>82</sup> Workshops and information events have also been organised by the regional agencies tasked with supporting and advising project developers and applicants.<sup>83</sup>

Despite the aforementioned efforts to foster public participation and the requirements for inclusive governance, stakeholder involvement in Germany's JTF planning and implementation process has seemed limited. Local governments have reportedly been excluded from drafting the TJTPs, and throughout the process there has been little evidence of structured engagement with civil society organisations, trade unions, or vulnerable groups, such as youth or ethnic minorities. As indicated in the Territorial Just Transition Plan Assessment for the region of North Rhine-Westphalia, the participation mechanisms in place have often fallen short of the partnership principle endorsed by the EU, and even when such structures exist, they have been perceived as ineffective or symbolic with no decision-making power.<sup>84</sup>

<sup>76</sup> European Commission, *New Innovation Campus and support for SMEs in Schwedt-Oder, Germany thanks to the Just Transition Fund (JTF)*, 2025, [https://ec.europa.eu/regional\\_policy/whats-new/newsroom/24-02-2025-new-innovation-campus-and-support-for-smes-in-schwedt-oder-germany-thanks-to-the-just-transition-fund-jtf\\_en](https://ec.europa.eu/regional_policy/whats-new/newsroom/24-02-2025-new-innovation-campus-and-support-for-smes-in-schwedt-oder-germany-thanks-to-the-just-transition-fund-jtf_en).

<sup>77</sup> *Ibidem*.

<sup>78</sup> *Ibidem*.

<sup>79</sup> *Ibidem*.

<sup>80</sup> Nexus Institut, *Support in the Establishment and Moderation of the Citizens' Advisory Council Structural Change in the Central German Coalfields (Saxony-Anhalt)*, n.d., <https://nexusinstitut.de/en/support-in-the-establishment-and-moderation-of-the-citizens-advisory-council-structural-change-in-the-central-german-coalfields-saxony-anhalt/>.

<sup>81</sup> Sachsen.de, *EU funding Just Transition Fund (JTF) - Funding priorities of the JTF in Saxony 2021-2027*, n.d., <https://www.strukturentwicklung.sachsen.de/eu-foerderung-just-transition-fund-jtf-4749.html?>

<sup>82</sup> Saxony State Ministry for Economic Affairs, Labour and Transport (SMWA), *Strukturwandel / Just Transition Fund*, n.d., <https://www.smwa.sachsen.de/strukturwandel-just-transition-fonds-12518.html>.

<sup>83</sup> Ministry for Labor, Health and Social Affairs of North Rhine-Westphalia, *Just Transition Fund 2021-2027*, n.d., <https://www.mags.nrw/esf-2021-2027-just-transition-fund>.

<sup>84</sup> WWF, *Territorial Just Transition Plans - build your scorecard, Assessment for Germany (Rhenishes Revier)*, 2022, <https://just-transitions-plan.wwf.eu/assessment/80BMrSWZsPfrp2r9nfMS>.

Monitoring committees exist at the regional level but there has been inconsistency across subregions regarding their structure and effectiveness, with Saxony having a dedicated JTF program and committees, while North Rhine-Westphalia has a consolidated representation that has seemed to limit the influence of individual local governments.

As far as the involvement of youth and marginalised groups in the process is concerned, it is clear that even though some subregions, for example Saxony-Anhalt, have some mechanisms such as dialogue formats in place, marginalised youth remain disengaged as they fail to recognise the link between their everyday struggles and the just transition or broader societal issues.<sup>85</sup> Additionally, the youth tend to be excluded from participating in decision-making processes related to JTF planning.<sup>86</sup>

However, it is important to mention that German civil society organisations face institutional and legal limitations, such as a lack of legal clarity regarding their political activity.<sup>87</sup> It constrains their ability to participate meaningfully in public policy processes such as JTF planning, hence their potential limited scope of engagement in various JTF-related initiatives.<sup>88</sup>

### 3.4. The German JTF at a glance

Germany's Just Transition Fund (JTF) implementation is shaped by the broader Energiewende framework. With the EUR 41.09 billion in federal support for coal regions compared to the EUR 2.5 billion JTF allocation, it is clear that the latter plays a secondary role. Despite the slow progress (only 48.8% of JTF projects have been approved and just 5.9% of funds spent), German stakeholders emphasise the importance of a dedicated, tangible fund like the JTF, especially given its focus on addressing territorial disparities related to energy transition. It is evident that the JTF's flexibility has made the funding more tailored to local challenges rather than rigidly fitting into pre-defined categories.

However, as far as improvements are concerned, German stakeholders report that the partnership principle should be further strengthened to ensure that local communities can be meaningfully involved, not only in the funds' distribution but also in the broader energy transition process.

Enhancing the visibility and traceability of the EU contributions could help the citizens understand and trust (and as a result, potentially support) the purpose of the just transition funding and its source.

Finally, German stakeholders insist that without showcasing clear local benefits and improving the transparency of the process, public trust in the energy transition and EU support mechanisms may erode.

This should be seen as an effort that all the parties involved – from EU institutions to Member State governments, managing authorities and other involved entities – have to make together.

<sup>85</sup> European Citizen Action Service (ECAS), *Youth and Just Transition – between disengagement and active participation*, 2024, <https://ecas.org/youth-and-just-transition-between-disengagement-and-active-participation/>.

<sup>86</sup> *Ibidem*.

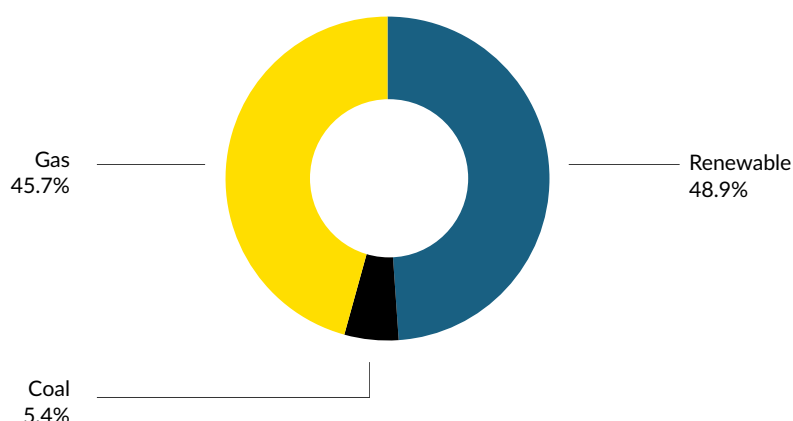
<sup>87</sup> S. Hummel, *Germany's Contested Civil Society in a Time of Politization*, *Nonprofit Policy Forum*, 13(3), 2022, p. 195–210, <https://www.degruyterbrill.com/document/doi/10.1515/npf-2021-0060/html>.

<sup>88</sup> *Ibidem*.

## 4. Greece

Greece used to have significant coal electricity generation. However, the reliance on coal in Greece's energy mix has decreased significantly over the years. In 2015, coal made up almost 49% of the country's electricity generation,<sup>89</sup> but by 2025, this share had been reduced to 5%.<sup>90</sup> Under the existing EU regulatory framework, a policy change was announced in September 2019 by the Prime Minister of Greece, Kyriakos Mitsotakis, who<sup>91</sup> stood before the United Nations General Assembly and declared his country's intention to phase out its lignite sector by 2028. In December 2019, Greece submitted its revised National Energy and Climate Plan to the European Commission (EC), reflecting its new targets for the lignite phase-out, to be achieved by implementing a corresponding front-loaded programme in the following decade<sup>92</sup> and a complete end to the use of lignite for power generation in Greece by 2028.<sup>93</sup> Within a few weeks of the revised NECP submission, the Public Power Corporation S.A. (ΔΕΗ or DEI in Greek) decided to accelerate the closure of the existing lignite-fired plants with a capacity of 3.4 GW by 2023.<sup>94</sup> It was decided that the last plant would be Ptolemaida 5 (commissioned in 2023).<sup>95</sup> The latest NECP submitted in 2025 to the European Commission indicates its lignite operation will end in 2028. This update is explicitly framed as a response to the aftermath and fallout of the Russian invasion of Ukraine.<sup>96</sup>

Figure 6. Greece's electricity generation mix in 2025



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Source: Energy-Charts, *Public net electricity generation in Greece in 2025, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=GR&interval=year&year=2025](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=GR&interval=year&year=2025).

<sup>89</sup> Energy-Charts, *Public net electricity generation in Greece in 2015, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=GR&interval=year&year=2015](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=GR&interval=year&year=2015).

<sup>90</sup> Energy-Charts, *Public net electricity generation in Greece in 2025, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=GR&interval=year&year=2025](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=GR&interval=year&year=2025).

<sup>91</sup> World Bank Group, *A Road Map for a Managed Transition of Coal-Dependent Regions in Western Macedonia – Greece*, 2020, <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/103611593562422573>.

<sup>92</sup> European Commission, *Greece – Final updated NECP 2021-2030 (submitted in 2025)*, 2025, [https://commission.europa.eu/publications/greece-final-updated-necp-2021-2030-submitted-2025\\_en](https://commission.europa.eu/publications/greece-final-updated-necp-2021-2030-submitted-2025_en).

<sup>93</sup> DEI, *PPC's medium-term strategic priorities and financial outlook for 2020, 2019*, p. 10, [https://www.ppcgroup.com/media/f24atsoc/20191216\\_ppc\\_press\\_release\\_final\\_en.pdf](https://www.ppcgroup.com/media/f24atsoc/20191216_ppc_press_release_final_en.pdf).

<sup>94</sup> Power Technology, *Power plant profile: Ptolemaida Power Plant V, Greece*, 2024, <https://www.power-technology.com/data-insights/power-plant-profile-ptolemaida-power-plant-v-greece/>.

<sup>95</sup> Balkan Green Energy News, *Greece pushes its coal exit target date forward to 2026*, 2024, <https://balkangreenenergynews.com/ppc-pushes-its-coal-exit-target-date-forward-to-2026/>; Balkan Green Energy News, *Greece officially writes off four coal-fired thermal power units*, 2021, <https://balkangreenenergynews.com/greece-officially-writes-off-four-coal-fired-thermal-power-units/>.

<sup>96</sup> European Commission, *Greece – Final updated NECP 2021-2030 (submitted in 2025)*, 2025, Section 1.1 – Introduction and starting point, 62–63 of the PDF, [https://commission.europa.eu/publications/greece-final-updated-necp-2021-2030-submitted-2025\\_en](https://commission.europa.eu/publications/greece-final-updated-necp-2021-2030-submitted-2025_en).

## 4.1. Financing and governance of the Greek just transition

The governance<sup>97</sup> of the JTF in Greece is centralised under the Ministry of Economy and Finance,<sup>98</sup> which oversees a special entity – the Just Transition Special Authority – JTSA (Greek: Διαχειριστική Αρχή Προγράμματος ΔΑΜ – EYDAM), which was established to facilitate coordination and act as the Managing Authority of the newly created and stand-alone JTD Programme. JTSA is responsible for the overall planning, programming, and implementation of just transition policies, ensuring compliance with EU structural fund regulations and national priorities within the framework of the Just Transition Plan, the JTDP, and the Territorial Just Transition Plans (TJTps).<sup>99</sup> The implementation of the JTD Programme is supervised by a Monitoring Committee through which the government involves almost every ministry and regional authority, industry and trade organisations, as well as the NGO sector. However, the latter is perceived as underrepresented, with only 2 out of 64 members on the Committee.<sup>100</sup>

In order to strengthen local stakeholder participation the JTSA has established, based on recommendations,<sup>101</sup> Regional/Territorial Committees, which operate alongside the JTDP Monitoring Committee.<sup>102</sup>

Based on the national regulation on just transition development, a state-owned company METAVASI M.A.E. was established. It is supervised by the Ministry of Economy and Finance and acts as a supporting authority for managing the post coal mine lands and promoting investments.<sup>103</sup>

The integrated approach (with the involvement of local stakeholders) is achieved through the TJTps, which define the intervention strategy in each affected territory. Regional/Territorial Committees were organised for Western Macedonia, Megalopolis and the islands as an advisory and consultative tool to discuss potential projects and investments.

The Greek JTD programme in Greece is managed centrally (a top-down approach), and monitored according to thematic priorities, in compliance with the relevant EU Regulations (CPR 1060/2021<sup>104</sup> & JTF 1056/2021<sup>105</sup>). The official programming documents do not clearly specify regional funding allocations. In practice, there are specific allocations per region indicated in most calls, but the data on progress in spending per region is not published. Therefore, there is limited access and low public traceability regarding how much money has been decided upon, contracted or spent per region. Nevertheless, all actions funded under the JTD Programme to date have followed a defined allocation per region which is: 63% for Western Macedonia, 24% for Megalopolis broader area and 13% for island areas. Overall Greece had decided 52.9% of the allocation and managed to spend 7.8% by the end of December 2025.

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97 EYDAM – Just Transition Special Authority, *Report on the analysis and assessment of risks for the implementation of the “Just Development Transition 2021-2027” Program and an action plan for the implementation of the strategy and the readjustment of the mix of its actions*, 2025.

98 European Commission, *Partnership Agreement with Greece – 2021-2027*, 2021, [https://commission.europa.eu/publications/partnership-agreement-greece-2021-2027\\_en](https://commission.europa.eu/publications/partnership-agreement-greece-2021-2027_en).

99 EYDAM – Just Transition Special Authority, *Organizational chart*, 2023, <https://eydam.gr/evdam-eidiki-ypiresia-dikaiis-anapty/organogramma/>.

100 Official Gazette of the Hellenic Republic, *Issue B’ 6421 (2)*, 2024, p. 67137-67148, <https://eydam.gr/wp-content/uploads/2024/11/%CE%A6%CE%95%CE%9A-6421.pdf>.

101 *The governance of Just Transition in Greece and in Europe*, 2021, [https://thegreentank.gr/en/2021/07/19/governance\\_just\\_transition\\_en/](https://thegreentank.gr/en/2021/07/19/governance_just_transition_en/).

102 The Green Thank, *Ενεργοποιούνται οι Εδαφικές Επιτροπές ΔΑΜ*, 2023, <https://thegreentank.gr/2023/07/05/edafikes-epitropes-dam/>.

103 Metavasi S.A. (Metavasi – Greek Just Transition Development Company), *About Us*, n.d., ΣΧΕΤΙΚΑ ΜΕ ΕΜΑΣ – ΜΕΤΑΒΑΣΗ Α.Ε. – Ελληνική Εταιρεία Δίκαιης Αναπτυξιακής Μετάβασης, <https://metavasi-dam.gr/%cf%83%cf%87%ce%b5%cf%84%ce%b9%ce%ba%ce%b1-%ce%bc%ce%b5-%ce%b5%ce%bc%ce%b1%cf%83/>.

104 *Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy*, <https://eur-lex.europa.eu/eli/reg/2021/1060/oj/eng>.

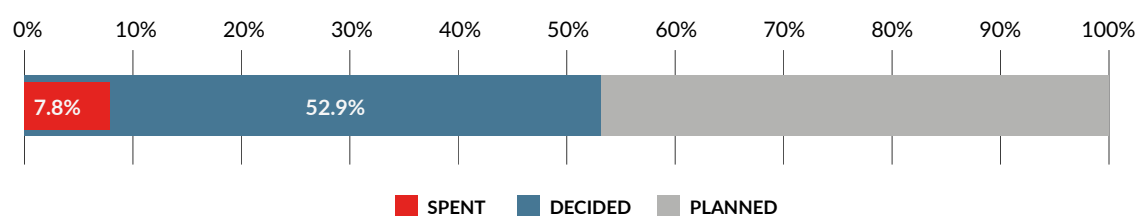
105 *Regulation (EU) 2021/1056 of the European Parliament and of the Council of 24 June 2021 establishing the Just Transition Fund*, PE/5/2021/REV/1.

Table 4. Greece's Just Transition Fund distribution

| TJTP                                       | BUDGET (EURO) | OF TOTAL BUDGET (%) |
|--|---------------|---------------------|
| Western Macedonia (1)                      | 1,026.6       | 63                  |
| Megalopoli (2)                             | 391           | 24                  |
| North and South Aegean Islands & Crete (3) | 211.4         | 13                  |
| <b>Total</b>                               | <b>1.629</b>  | <b>100</b>          |

Source: Eydam, *Report on the analysis and assessment of risks for the implementation of the "Just Development Transition 2021–2027" Program and an action plan for the implementation of the strategy and the readjustment of the mix of its actions, 2025.*

Figure 7. Implementation of the Just Transition Fund in Greece



Source: European Commission, *Cohesion Open Data Platform, Just Transition Fund, 2021–2027, Finances: Implemented, 2025*, <https://cohesiondata.ec.europa.eu/funds/jtf/21-27#finance-implementation>.

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The planned allocation for the JTF in Greece is structured as follows:<sup>106</sup>

- economic policies (61% of the Fund) – ca. 30% SMEs, 14% large companies, 1% retraining/upskilling, 16% employment,
- environmental policies (21%) – ca. 17% RES-based energy, 4% land restoration,
- social policies (2%) – ca. 1% R&D&I in public sectors, 1% culture, 0% education,
- other – 16%.

## 4.2. Project to follow

### **Bioeconomy 360° Hub**

The JTDP indicates a few emblematic projects. One of them is the “Bioeconomy 360° Hub”, which is to be located in the broader area of Megalopolis (Municipalities of Megalopolis, Gortynia, Oichalia, Tripoli), with the University of the Peloponnese as the scientific lead and in collaboration with local Chambers of Commerce.

One of the key strengths of Megalopoli is the climate of the area, which is beneficial for the development of the agri-food sector. In particular, one third of the arable land for cereals, livestock and industrial products as well, as the majority of the melon production, is located in the broader geographical area of Megalopoli. In addition, the area can produce agricultural products, such as olive oil (vanilla Mainalou), organic honey, walnuts, wine (Moschofilero Mantineias) with export potential to European and third countries. To tap into this potential, a Bioeconomy Hub 360° pilot project has been put forward. It aims to help the community re-invent its identity through sustainable, circular and organic agriculture and create added value across the agri-food sector, leveraging the opportunities of Industry 4.0<sup>107</sup> (or the Fourth Industrial Revolution).<sup>108</sup>

It endeavours to transform economic and production activities across the full value chain of Bioeconomy (Agri-food, Circular and Digital Economy), leveraging research outcomes.

## 4.3. Public participation

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The process of public participation in Greece's just transition is characterised by a mix of centralised control and emerging local engagement.

The basic tool for the involvement of stakeholders in the management of the Just Transition Development Programme is the national-level Monitoring Committee. The document establishing it calls for 64 members of the Committee, primarily government representatives, alongside regional authorities. The economic and social sectors as well as civil society are represented mainly via nationwide organisations (18), representing various groups. Among them are only two NGOs that work on just transition in affected areas (the Association of Active Youths of Florina and the Green Tank).<sup>109</sup>

In March 2023, two Regional/Territorial Committees for Just Development Transition (DAM) were established in Western Macedonia,<sup>110</sup> and these organisations have become more active in discussions about the just transition. Regional/Territorial Committees are appointed as advisory and consultative bodies for each transition area. However, there are concerns about the effectiveness of public engagement here, as these committees only allow stakeholders to voice their perspectives on proposals with no formalised impact.

<sup>107</sup> Industry 4.0 or the Fourth Industrial Revolution – rapid technological advancement; industrial sectors making the best use of new technologies and managing their transition towards higher value digitised products and processes.

<sup>108</sup> P. Baker, A. Broughton, R. Pollock, K. Spyridopoulos, A. Vigkos, *Building on local assets to create a new economy: A report on municipality of Megalopolis and eligible area*, 2022, p. 29, <https://circabc.europa.eu/ui/group/301e9528-b63b-4ca5-b7fa-c7f879572d5e/library/9f1214ad-d000-4c0c-a671-82cd9a842ff3/details>.

<sup>109</sup> Official Gazette of the Hellenic Republic, *Issue B' 6421 (2)*, 2024, p. 67137–67148, *op.cit.*

<sup>110</sup> The Green Thank, *Ενεργοποιούνται οι Εδαφικές Επιτροπές ΔΑΜ*, 2023, <https://thegreentank.gr/2023/07/05/edafikes-epitropes-dam/>.

#### 4.4. The Greek JTF at a glance

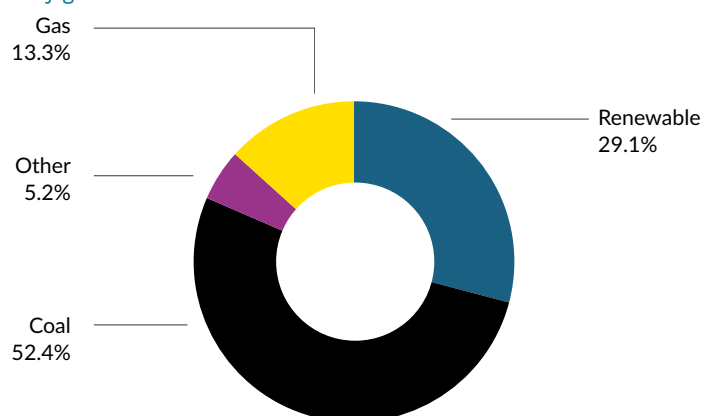
Greece demonstrates a centralised model of governance and financing that, at the time of its design, was designed with the goal of responding to the need for better coordination of its diverse JTF areas, including both mainland and island regions. This arrangement seems to impact the possible influence that local stakeholders can have on the way transition is being implemented. There is a clear consensus that the local level lacks capacities, resulting in the insufficient involvement of diverse stakeholders, particularly local communities, NGOs, and youth organisations. The JTD Programme Monitoring Committee is made up of a broad array of members, and yet the majority are central level representatives, negatively impacting regional ownership and effectiveness. To address this challenge, the Greek authorities took the initiative to establish Regional/Spatial Committees<sup>111</sup> at the local level, providing an additional platform for consultation. Concerns persist regarding the transparency and equitable distribution of JTF funds, primarily because official programming documents do not clearly specify regional funding allocations. Nevertheless, all actions funded under the JTD Programme to date follow a defined regional allocation: 63% for Western Macedonia, 24% for the broader Megalopolis area, and 13% for the island regions. Establishing clear tracking mechanisms for fund allocation and spending would significantly improve accountability. The limited timeframe of the JTF raises concerns about the sustainability of transition efforts. There is a need for a stable, long-term financing strategy that extends beyond the current funding period and integrates broader decarbonisation and economic diversification goals.

## 5. Poland

Following Germany, Poland is the second-largest coal power state in the European Union.<sup>112</sup> The share of coal in Poland's electricity generation mix fell from 87% in 2015<sup>113</sup> to 52% in 2025 (33% from hard coal, 19% from lignite).<sup>114</sup> As of 2025, Poland generates 52 TWh from hard coal and 31 TWh from lignite.<sup>115</sup> At the same time, renewables accounted for 31% of electricity generation with wind as a dominant source (14%).<sup>116</sup>

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Figure 8. Poland's electricity generation mix in 2025



Source: Energy-Charts, *Public net electricity generation in Poland in 2025, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=PL&interval=year&year=2025](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=PL&interval=year&year=2025).

<sup>111</sup> Just Transition Institute Greece (JTIG), *Who we are*, 2024, <https://jtig.org/#who-we-are>.

<sup>112</sup> Ember, *Countries and Regions – Poland*, 2025, <https://ember-energy.org/countries-and-regions/poland/>.

<sup>113</sup> Energy-Charts, *Public net electricity generation in Poland in 2015, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=PL&interval=year&year=2015](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=PL&interval=year&year=2015).

<sup>114</sup> Energy-Charts, *Public net electricity generation in Poland in 2025, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=PL&interval=year&year=2025](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=PL&interval=year&year=2025).

<sup>115</sup> *Ibidem*.

<sup>116</sup> J. Wójcik, *Forum Energii*, 2025, *wrapped od Forum Energii, czyli błyskawiczny przegląd najciekawszych danych z zakresu elektroenergetyki z 2025 r., op.cit.*

Even though Poland's energy transition is progressing relatively fast, there is no nationwide strategy guiding it. The 2021 *Polish Energy Policy until 2040* (PEP2040) provides some outline, but it does not address the process holistically, and it lacks up-to-date estimations.<sup>117</sup> According to the PEP2040,<sup>118</sup> the share of coal in electricity generation was supposed to drop to 56% by 2030.<sup>119</sup> Yet, this goal was achieved in 2024 with a record low of 56.2%.<sup>120</sup> Similarly, the photovoltaic targets (5–7 GW by 2030, 10–16 GW by 2040)<sup>121</sup> were achieved in 2022 with 10 GW of installed photovoltaic capacity, doubling the 2040 goal.<sup>122</sup>

It can be argued that the Just Transition Fund has been instrumental in initiating the discussion on the energy transition and structuring more realistic and formal efforts toward coal phase-out, as it included a mandatory prerequisite to provide clear timelines for the coal phaseout in Poland. This led to an attempt to first create a national-level transformation plan, and when that failed, certain phaseout decisions were included in the TJTPs prepared for specific regions (e.g., for Eastern Wielkopolska or Bełchatów), while for the hard coal regions the timeline was based on the so-called *Social Contract*.<sup>123</sup> In the case of a few regions (particularly the area surrounding the Turów mine in Lower Silesia and the Bogdanka mine in the Lubelskie voivodeship), no clear decisions were reached at either the regional or national level. The TJTPs from these two regions were thus not approved to receive financing from the JTF as they lacked a clear phaseout timeline.

In 2021, the government, the mining municipalities, the management boards of mining companies, and the trade union representatives of the hard coal industry (primarily located in Silesia) signed the so-called *Social Contract*.<sup>124</sup> It set forth the closure schedule of hard coal mines with the last one to be closed in 2049.<sup>125</sup> It addressed public support and state aid schemes for the sector (requiring the European Commission's notification), social protection measures, pay indexation as well as the creation of the Silesia Transformation Fund<sup>126</sup> – making Silesia the only Polish region in transition to receive such support.<sup>127</sup>

In 2022, the government signed another *Social Contract* – this time with the lignite industry's trade union representatives.<sup>128</sup> The 2022 agreement had a broader scope, addressing both lignite mining and coal-based power plants.<sup>129</sup> It included employment guarantees and social packages that were later implemented by the 2023 *Act on social protection for employees in the lignite and energy sectors*.<sup>130</sup> The lignite *Social Contract* was primarily co-developed as a result of pressure from the mining and energy company ZEPAK from Eastern Wielkopolska, as their phaseout commitments were the most ambitious, with the last mine in the region scheduled to be closed down at the beginning of 2026.<sup>131</sup> Bełchatów plans to continue operating until the mid-2030s.<sup>132</sup>

117 Ministry of Climate and Environment (Poland), *Energy Policy of Poland until 2040*, 2021, <https://www.gov.pl/web/klimat/polityka-energetyczna-polski>.

118 Even though the PEP2040 is still binding, more up to date and realistic scenarios can be found in the National Climate and Energy Plan discussed below.

119 Ministry of Climate and Environment (Poland), *Energy Policy of Poland until 2040*, *op.cit.*

120 Forum Energii, *Energy Transformation in Poland. Edition 2025*, 2025, <https://www.forum-energii.eu/transmacja-energetyczna-polski-edycja-2025>.

121 Ministry of Climate and Environment (Poland), *Energy Policy of Poland until 2040*, *op.cit.*

122 Ember, *PEP2040: Progress or Disappointment?*, 2025, <https://ember-energy.org/pl/raporty/pep2040-postep-czy-rozczarowanie/>.

123 CEE Bankwatch Network, *Following the money: Poland*, 2024, <https://bankwatch.org/publication/following-the-money-poland>.

124 Ministry of State Assets (Poland), *Social Agreement for Mining Signed*, 2021, <https://www.gov.pl/web/aktywa-panstwowe/umowa-spoleczna-dla-gornictwa-podpisana>.

125 *Social Agreement for Coal Mining*, 2021, p. 7, <https://solidarnoskatowice.pl/wp-content/uploads/2021/04/Umowa-Spoleczna.pdf>.

126 The Silesia Transformation Fund is a financial instrument designed to mitigate the socio-economic impacts of the energy transition by supporting new investments, economic diversification, job creation, reskilling programmes, and infrastructure development. It complements the EU resources, including the Just Transition Fund.

127 *Social Agreement for Coal Mining*, 2021, p. 5, *op.cit.*

128 Ministry of State Assets (Poland), *Social Agreement – green light for the creation of NABE*, 2022, <https://www.gov.pl/web/aktywa-panstwowe/umowa-spoleczna--zielone-swiatlo-dla-utworzenia-nabe>.

129 *Ibidem*.

130 *Act of 17 August 2023 on Social Protection for Employees of the Power Sector and the Lignite Mining Industry*, Journal of Laws of 2023, item 1737, <https://dziennikustaw.gov.pl/DU/2023/1737>.

131 ZEPAK, *Górnicy mają plan. Czy wizyta Timmermansa w Wielkopolsce wschodniej rozwiąże ich problemy?*, 2023, <https://www.zepak.com.pl/pl/o-firmie/biuro-prasowe/aktualnosci/14706-gornicy-maja-plan-czy-wizyta-timmermansa-w-wielkopolsce-wschodniej-rozwiaze-ich-problemy.html>.

132 PGE, *Flexibility as the basis for energy security and PGE's value creation philosophy*, 2022, <https://www.gkpge.pl/en/pge-group/about-group/pge-group-s-strategy>.

In December 2025, the Ministry of Energy presented a new draft of the updated National Climate and Energy Plan (NECP) with the two following scenarios:

- The WEM (with existing measures), known as the business-as-usual scenario, projects a 43% reduction in greenhouse gas (GHG) emissions by 2030 compared compared to that of 1990 and 61% by 2040, as well as an increase in the share of renewable energy in electricity production to 51% by 2030 and 65% by 2040.
- The WAM (with additional measures) scenario projects a 53% reduction in GHG emissions by 2030 and 75% by 2040, as well as an increase in the share of renewable energy in electricity production to 53% by 2030 and 68% by 2040.<sup>133</sup>

The updated NECP also identifies the investment needs associated with the mine closure processes, land rehabilitation, and the transformation of post-mining areas.<sup>134</sup>

### 5.1. Financing and governance of the Polish just transition

Poland is the largest Just Transition Fund beneficiary with five coal regions (Silesia, Małopolska, Wielkopolska, Lower Silesia, and Łódzkie) to receive EUR 3.85 billion.<sup>135</sup> Two coal subregions, namely where the Turów and Bogdanka mines are located, did not qualify for JTF support, as their TJTPs were deemed insufficiently ambitious in terms of timelines for phasing out coal-related activities.<sup>136</sup> The overview of Poland's final JTF distribution is presented below.

Table 5. Poland's Just Transition Fund distribution

| POLAND'S EU JUST TRANSITION FUND DISTRIBUTION |                            |                   |                 |                 |               |
|---|----------------------------|-------------------|-----------------|-----------------|---------------|
| REGION  | GRANT ALLOCATION (MLN EUR) | DECIDED (MLN EUR) | DECIDED (SHARE) | SPENT (MLN EUR) | SPENT (SHARE) |
| Silesia                                       | 2,608.1                    | 2,143.72          | 82.2%           | 334,519.1       | 12.8%         |
| Małopolska                                    | 311.2                      | 226.5             | 72.8%           | 67.5            | 21.7%         |
| Wielkopolska                                  | 592.6                      | 417.1             | 70.4%           | 38.2            | 6.4%          |
| Lower Silesia                                 | 830.8                      | 491.7             | 59.2%           | 134.2           | 16.2%         |
| Łódzkie                                       | 434.7                      | 221.4             | 50.9%           | 20.6            | 4.7%          |

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Source: European Commission, *Cohesion open data platform – Just Transition Fund (JTF)*, 2025, Open Data Portal for the European Structural Investment Funds – European Commission, <https://cohesiondata.ec.europa.eu/funds/jtf/21-27#finance-implementation>.

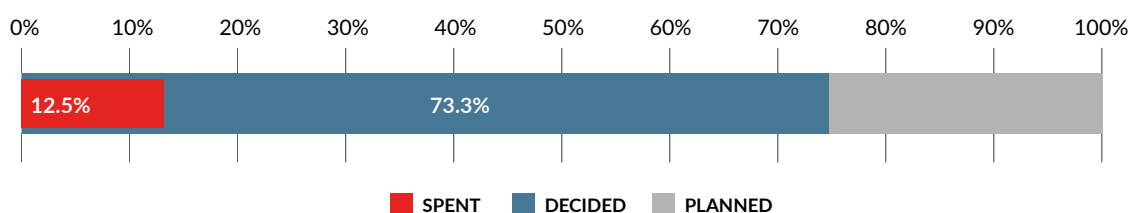
<sup>133</sup> Ministry of Energy (Poland), *Ministerstwo Energii opublikowało projekt Krajowego Planu w dziedzinie Energii i Klimatu do 2030 i 2040 roku. To kluczowy dokument dla polskiej energetyki i polskiej gospodarki*, 2025, <https://www.gov.pl/web/energia/ministerstwo-energii-opublikowalo-projekt-krajowego-planu-w-dziedzinie-energii-i-klimatu-do-2030-i-2040-roku-to-kluczowy-dokument-dla-polskiej-energetyki-i-polskiej-gospodarki>.

<sup>134</sup> Ministry of Climate and Environment (Poland), *Projekt Krajowego Planu w dziedzinie Energii i Klimatu do 2030 r. z perspektywą do 2040 r. - wersja przekazana do dalszego procedowania na poziomie Rady Ministrów*, n.d., <https://www.gov.pl/web/klimat/projekt-krajowego-planu-w-dziedzinie-energii-i-klimatu-do-2030-r-z-perspektywa-do-2040-r-wersja-przekazana-do-dalszego-procedowania-na-pozomie-rady-ministrow>.

<sup>135</sup> European Commission, *EU Cohesion Policy: €3.85 billion for a just transition toward climate neutral economy in five Polish regions*, 2022, [https://ec.europa.eu/commission/presscorner/detail/es/ip\\_22\\_7413](https://ec.europa.eu/commission/presscorner/detail/es/ip_22_7413).

<sup>136</sup> Instrat, *Two-speed transition? Letter to the European Commission on Behalf of Coal Regions Excluded from the Just Transition Fund*, 2025, <https://instrat.pl/en/letter-to-the-european-commission-on-behalf-of-coal-regions/>.

Figure 9. Implementation of the Just Transition Fund in Poland



Source: European Commission, *Cohesion Open Data Platform, Just Transition Fund, 2021-2027, Finances: Implemented, 2025*, <https://cohesiondata.ec.europa.eu/funds/jtf/21-27#finance-implementation>.

In total, over 73% of all the projects have already been decided, and 12.5% of Poland's allocation has been spent. The top beneficiary of the EU Just Transition Fund is Silesia – the largest hard coal mining region in the European Union, which received EUR 2.2 billion, out of which 78.5% has already been decided and 1% has been spent.

The planned allocation for the JTF in Poland is structured as follows:<sup>137</sup>

- economic policies (35% of the Fund) – ca. 28% SMEs, 4% large companies, 3% retraining/upskilling, 0% employment,
- environmental policies (35%) – ca. 10% RES-based energy, 14% land restoration and 11% other environmental projects,
- social policies (11,5%) – ca. 0% R&D&I in public sectors, 10% education, 1,5% social issues,
- other – 18,5%.

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Poland's JTF allocation is primarily directed toward economic and environmental activities, with social measures receiving a substantially smaller share. In comparison with other countries analysed in this publication, a significant portion of the allocation is dedicated to environmental issues, including land restoration and energy efficiency projects.

Poland applies a decentralised approach toward the JTF governance with the Marshals' Offices<sup>138</sup> in all five respective regions acting as the Managing Authorities, responsible for the implementation of the Just Transition Fund. Local and regional stakeholders emphasise that this helps them respond more effectively to regional challenges, remain closer to citizens, and when necessary – reallocate funds more quickly.<sup>139</sup> As indicated above, the TJTPs for the Polish just transition regions were developed at the voivodeship level (in the respective Marshals' Offices), which greatly impacted their scope and comprehensiveness.

It is however important to note that, at the moment, the key actors in decarbonisation, namely state-owned companies and national ministries, are not directly involved in managing the JTF resources.<sup>140</sup> Most of them are nevertheless members of the Just Transition Council – a Subcommittee on the Transformation of Mining Regions, which is coordinated by the Ministry of Funds and Regional Policy and serves as a consultative body.<sup>141</sup> It is worth mentioning that on the regional level, for example in Silesia, state-owned companies participate in activities undertaken by the Marshal's Office, including workshops, working meetings, and selected JTF calls for proposals, as well as being active in the Regional Just Transition Council,<sup>142</sup> along with representatives of the respective ministries.<sup>143</sup>

<sup>137</sup> European Commission, *Cohesion Open Data Platform, Just Transition Fund (JTF), Finances: Planned (2021-2027), Following the money: Poland*, 2023, <https://bankwatch.org/publication/following-the-money-poland>.

<sup>138</sup> The executive administrative bodies of voivodeships (regions in Poland).

<sup>139</sup> Source: interview with Małgorzata Staś, Director of the Department of Regional Development and Transition, Marshal Office of the Silesian Voivodeship.

<sup>140</sup> Forum Energii, *Just transition: what number to call?*, 2024, <https://www.forum-energii.eu/en/just-transition-what-number-to-call>.

<sup>141</sup> Source: interview with Małgorzata Staś, *op.cit.*

<sup>142</sup> Sprawiedliwa Transformacja Województwa Śląskiego, *Informacje ogólne o RRST*, n.d., <https://transformacja.slaskie.pl/pl/informacje-ogolne/regionalna-rada-ds-sprawiedliwej-transformacji>.

<sup>143</sup> Source: interview with Małgorzata Staś, *op.cit.*

However, due to limited coordination between the regions and the ministries responsible for leading the energy transition and distributing EU funds, the JTF implementation has been hampered. It has been further challenged by a slow and fragmented decision-making process, as well as by the lack of an adequate legal basis or planned measures for continued mine closure and redevelopment.<sup>144</sup>

Initial confusion about the JTF's distinct role compared to other EU funds, combined with capacity gaps, administrative delays, and poor early guidance from the European Commission, has further complicated the implementation. It has resulted in an influx of low-quality project proposals, creating a serious risk of underutilising the available resources before the 2026 NextGenerationEU deadline.<sup>145</sup>

It is important to note that financing the energy transition in Poland relies heavily on European funds.<sup>146</sup> In the 2021–2027 programming period, Poland received EUR 21.9 billion under the second Cohesion Policy Objective (a more environmentally friendly, low-carbon Europe).<sup>147</sup> Poland was also allocated EUR 15 billion for the Greener Europe-Policy Objective under the European Regional Development Fund (ERDF). Finally, the National Recovery and Resilience Plan (amounting to EUR 59.8 billion with EUR 25.3 billion in grants and EUR 34.5 billion in preferential loans),<sup>148</sup> under the Recovery & Resilience Facility, will help facilitate further efforts to decarbonise Poland's economy.<sup>149</sup>

Even though the JTF may appear modest compared to other EU resources available to Poland, its unique focus on mitigating the social and economic consequences of the transition in fossil-fuel-dependent regions makes it exceptional. Its strong employment-focused dimension (covering workers' reskilling and local job creation) is as important as its territorial nature and the flexibility it provides. It allows Poland to tailor measures to regional needs (particularly the NUTS3 level of just transition regions) in ways other EU funds cannot.

<sup>144</sup> *Ibidem.*

<sup>145</sup> Forum Energii, *Just transition: what number to call?*, *op.cit.*

<sup>146</sup> Ministry of Funds and Regional Policy (Poland), *Energy transition with EU support*, 2021, <https://www.gov.pl/web/fundusze-regiony/transformacja-energetyczna-z-unijnym-wsparciem>.

<sup>147</sup> Ministry of Development Funds and Regional Policy (Poland), *Partnership Agreement is a record EUR 76 billion, which is about PLN 350 billion for Poland*, 2022, <https://www.gov.pl/web/funds-regional-policy/partnership-agreement-is-a-record-eur-76-billion-which-is-about-pln-350-billion-for-poland>.

<sup>148</sup> European Commission, *Poland's recovery and resilience plan*, n.d., [https://reforms-investments.ec.europa.eu/polands-recovery-and-resilience-plan\\_en?prefLang=pl](https://reforms-investments.ec.europa.eu/polands-recovery-and-resilience-plan_en?prefLang=pl).

<sup>149</sup> *Ibidem.*

## 5.2. A project to follow

### Nikiszowiec Just Transition Centre

One of the flagship projects supported by the Just Transition Fund in Poland is the *Nikiszowiec Just Transition Centre*. Located in the historic district of Katowice, the capital of Silesia, it has been provided with a €661,000 JTF grant.<sup>150</sup> Through a range of educational workshops and community engagement programs, it will help residents navigate the transformation of their neighbourhood into what will be referred to as the *New Technologies District – Gaming and Technology Hub*.<sup>151</sup> Its main aim is to create new opportunities and foster innovation while honouring the rich industrial heritage of this area.<sup>152</sup>

The Katowice Gaming and Technology Hub project:

- includes the adaptation of 8 historical buildings to create office spaces and conference rooms that will also serve as an educational centre,<sup>153</sup>
- focuses on constructing a 5,000 square metre multipurpose hall that will be used for e-sport studies, television studios, production halls, warehouses and laboratories,
- aims to install and further develop renewable energy facilities on its campus.<sup>154</sup>

## 5.3. Public participation

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The level of public participation in Poland's JTF process can be considered relatively high. In Silesia and Eastern Wielkopolska, a diverse group of stakeholders has been involved in preparing the Territorial Just Transition Plans, and they have also been represented within the Monitoring Committees for the respective regional programs. Similarly, in the Łódzkie region, where Bełchatów is located, the Monitoring Committee consists of various actors, but a representation of local CSOs is missing. However, it is important to note that this has not been the result of any restrictions on their participation but merely a consequence of the limited engagement of civil society in the region.

One region in Poland that is considered to have a relatively high level of public participation is Silesia – the greatest JTF beneficiary across all Member States. In order to foster the engagement of various stakeholders, new participatory structures have been established, such as the *Regional Just Transition Council*. It was initially launched as a working group and has now been formalised, gathering 70 members, including representatives of municipalities, trade unions, NGOs, and the private sector.<sup>155</sup> Although the Council's composition appears balanced, civil society representatives note that discussions have often been led by state-owned companies and public institutions, which tend to be less supportive of ambitious transformation. Limited capacity and financial constraints, since many NGOs operate on a voluntary basis, have deepened their sense of marginalisation in such formal settings.<sup>156</sup>

Silesia's Marshal's Office conducted broad public consultations with a significant number of stakeholders participating in hybrid and online meetings, especially during the pandemic. Additional initiatives, such as *Civic Cafes*, have engaged local communities and provided platforms for direct interaction with citizens.<sup>157</sup>

<sup>150</sup> European Commission, *EU Cohesion Funds pave the way for social and economic transformation in Poland*, 2024, *op.cit.*

<sup>151</sup> Katowice for a change, *Katowice gaming and technology HUB*, n.d., <https://invest.katowice.eu/en/support-and-incentives-for-investors/katowice-gaming-and-technology-hub/>.

<sup>152</sup> European Commission, *EU Cohesion Funds pave the way for social and economic transformation in Poland*, *op.cit.*

<sup>153</sup> Katowice for a change, *New Technologies District, Katowice Gaming and Technology Hub*, n.d., p.15, [https://invest.katowice.eu/wp-content/uploads/2024/03/folder-hub-tech-2023\\_eng.pdf](https://invest.katowice.eu/wp-content/uploads/2024/03/folder-hub-tech-2023_eng.pdf).

<sup>154</sup> Katowice for a change, *Katowice gaming and technology HUB*, *op.cit.*

<sup>155</sup> Sprawiedliwa Transformacja Województwa Śląskiego, *Informacje ogólne o RRST*, *op.cit.*

<sup>156</sup> Source: interview with Patryk Białas, Director of the Innovation and Competence Center at the Euro-Centrum Science and Technology Park in Katowice.

<sup>157</sup> European Funds for Silesia, *Civic cafes in mining subregions*, 2025, [https://funduszeue.slaskie.pl/web/guest/w/kawiarenki\\_obywatelskie\\_w\\_podregionach\\_gornicznych](https://funduszeue.slaskie.pl/web/guest/w/kawiarenki_obywatelskie_w_podregionach_gornicznych).

However, despite launching formal participatory structures, the depth and extent of engagement with a wide range of actors remains challenging. Many of the new platforms function more as channels for sharing information and communicating final decisions rather than as spaces allowing for meaningful dialogue, which discourages civil society representatives from fully participating.<sup>158</sup>

According to Silesia's Marshal's Office, building trust and ownership among smaller local actors has been at times challenging and slow, but has led to increasingly strong and growing civil society engagement in the transition. The Managing Authority has established the *Regional Observatory of the Transformation Process* and partnered with representatives of trade unions, academia, civil society,<sup>159</sup> and the business sector to emphasise the key role of these stakeholders in supporting both the implementation and evaluation of the Just Transition Fund in Silesia.<sup>160</sup> The aforementioned body, fully funded by the JTF, specifically focuses on labour market challenges, economic diversification, and on unlocking the potential of post-industrial and post-mining areas.<sup>161</sup> However, it is important to note that some have argued that analyses on environmental and climate matters, as well as those focusing on decarbonisation, emission reductions, DNSH (Do No Significant Harm) principle or social acceptance, have been overlooked or insufficiently addressed.<sup>162</sup>

#### 5.4. The Polish JTF at a glance

Poland is the largest beneficiary of the Just Transition Fund (JTF), with EUR 3.85 billion allocated across five coal regions. While over 70% of the projects have already been approved, less than 10% of the funds had been spent by the end of October 2025. The Fund's governance is decentralised, with regional Marshals' Offices managing the JTF implementation, which allows for flexibility and responsiveness to local needs. This governance structure has been strongly supported by the European Commission. It has helped various groups of local stakeholders to be widely involved in JTF-related processes. However, it has also hampered multisectoral coordination of Polish just transition efforts as well as the cooperation between the government and regions.<sup>163</sup> The Polish stakeholders underline that the JTF's main strength has resided in its territorial and social focus, supporting reskilling, job creation, and economic diversification in coal-dependent regions. The JTF's ability to combine hard and soft components within projects has also been a great advantage.

However, the JTF implementation has shown that a better integration of different funding sources (JTF, ERDF, Modernisation Fund, Social Climate Fund, and national funds) under a coordinated framework is needed to avoid fragmentation and delays. Moreover, current administrative barriers could be avoided by creating clearer state aid rules or potentially separate ones specifically for transition projects. Furthermore, fostering more public-private partnerships could also be taken into consideration to drive the transition even faster.

Civil society representatives emphasise that two-way communication between decision-makers, non-governmental organisations and the general public should be encouraged to ensure that the participatory processes are truly co-creative rather than having stakeholders in a purely consultative role. To do so, further supporting NGOs – for example, by engaging them at all stages – is necessary to allow them to meaningfully participate and drive the process.

The JTF implementation in Poland has been hindered by the lack of a clear national just transition strategy and limited coordination between the ministries designated to lead the process.

Nevertheless, the Just Transition Fund has proven indispensable in building trust and sparking long-term planning in the Polish mining regions. It has encouraged local engagement, regional ownership, and initiated a debate on the energy transition in territories where this had never taken place before. Including a dedicated and visible funding stream that would support regions in transition in the next EU long-term budget is therefore highly recommended by the Polish stakeholders. Not only would it indicate a long-term EU commitment, but it would also show that the promise that no one be left behind in the just transition process will be delivered on.

<sup>158</sup> Source: interview with Patryk Białas, *op.cit.*

<sup>159</sup> The Regional Observatory of the Transformation Process operates with seven key partners – one of them is the Polish Green Network, a national-wide NGO. It is the sole civil society representative – there are no local or regional NGOs involved in the official partnership.

<sup>160</sup> European Funds for Silesia, *Regional Observatory of the Transformation Process 2.0 (ROPT 2.0)*, n.d., [https://funduszeue.slaskie.pl/web/guest/w/regionalne\\_obserwatorium\\_procesu\\_transformacji\\_2\\_0\\_ropt\\_2\\_0](https://funduszeue.slaskie.pl/web/guest/w/regionalne_obserwatorium_procesu_transformacji_2_0_ropt_2_0).

<sup>161</sup> *Ibidem.*

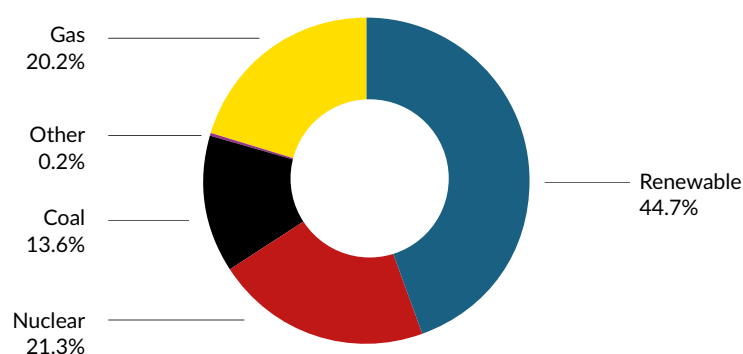
<sup>162</sup> Source: interview with Patryk Białas, *op.cit.*

<sup>163</sup> Source: interview with Piotr Siewierski, Regional Programmes Department, Ministry of Funds and Regional Policy.

## 6. Romania

Romania is among the largest energy producers in Southeast Europe.<sup>164</sup> Hydropower remains its leading source, contributing between 25% and 32%, depending on hydrological conditions.<sup>165</sup> In 2025, nuclear energy accounted for 21% of the electricity generation mix.<sup>166</sup> Coal's share in the country's electricity mix has declined sharply, falling from roughly 29% in 2015<sup>167</sup> to about 14% in 2025.<sup>168</sup> Over the same period, solar generation rose from 2% to nearly 6%, while wind increased from around 10% to 12%.<sup>169</sup>

Figure 10. Romania's electricity generation mix in 2025



30 Source: Energy-Charts, *Public net electricity generation in Romania in 2025, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=RO&interval=year&year=2025](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=RO&interval=year&year=2025).

The deadline for coal phase-out refers to the targets set for 2032<sup>170</sup> in Romania's decarbonisation law, which was adopted in November 2022. It is a key element of the national Recovery and Resilience Plan, which with the Territorial Plans (the TJTP of Gorj County and the restructuring plan of the Oltenia Energy Complex) has outlined the phaseout timeline also approved by the European Commission. At the same time, the coal regions are not the only ones affected by the planned transitions, as other highly polluting industries will also be restructured. The region of Prahova (petroleum), Galati (steel), Mures (chemical fertilisers) and Dolj (coal, but also automotive) are all expected to see significant declines in their polluting industries, job losses and—at the same time—a reduction of greenhouse gas emissions, which is why Romania's just transition process includes not only the coal regions but also other relevant industrial areas.<sup>171</sup>

<sup>164</sup> Low Carbon Power, *Electricity in Romania in 2024/2025, 2025*, <https://lowcarbonpower.org/region/Romania>.

<sup>165</sup> *Ibidem*.

<sup>166</sup> Energy-Charts, *Public net electricity generation in Romania in 2025, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=RO&interval=year&year=2025](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=RO&interval=year&year=2025).

<sup>167</sup> Energy-Charts, *Public net electricity generation in Romania in 2015, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=RO&interval=year&year=2015](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=RO&interval=year&year=2015).

<sup>168</sup> Energy-Charts, *Public net electricity generation in Romania in 2025, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=RO&interval=year&year=2025](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=RO&interval=year&year=2025).

<sup>169</sup> Energy-Charts, *Public net electricity generation in Romania in 2025, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=RO&interval=year&year=2025](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=RO&interval=year&year=2025).

<sup>170</sup> *Emergency ordinance, no. 108 of June 30, 2022 on the decarbonization of the energy sector. Published in the OFFICIAL GAZETTE No. 659 of July 1, 2022*, <https://legislatie.just.ro/Public/DetaliiDocument/256928>.

<sup>171</sup> CEE Bankwatch, *Following the money: Romania, 2023*, <https://bankwatch.org/publication/following-the-money-romania>.

## 6.1. Financing and governance of the Romanian just transition

The Just Transition Programme is the implementation instrument of the JTF and is a governing document over the TJTPs. The Plans cover six Romanian regions—the above-mentioned Galați, Prahova, Mureș, and the coal regions of Gorj, Hunedoara and Dolj with the phaseout date scheduled for 2032.<sup>172</sup>

The total planned sum of money that has been allocated from the Just Transition Fund to Romania currently amounts to roughly EUR 2.14 billion, the 3<sup>rd</sup> highest allocation in the European Union (after Poland and Germany).<sup>173</sup> However, implementation progress has been relatively slow – as of December 2025, only 37.9% of the Fund has been decided and only 3.2% spent.<sup>174</sup>

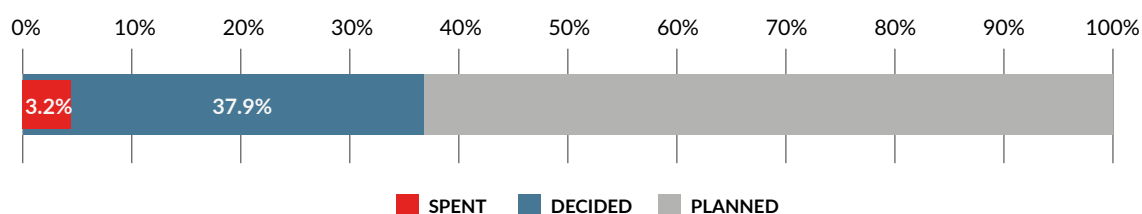
Table 6. Romania's JTF distribution

| REGION               | GRANT ALLOCATION (MLN EUR) | DECIDED (MLN EUR) | DECIDED (SHARE) | SPENT (MLN EUR) | SPENT (SHARE) |
|----------------------|----------------------------|-------------------|-----------------|-----------------|---------------|
| Hunedoara            | 411.2                      | 149.1             | 36.3%           | 2.7             | 0.7%          |
| Dolj                 | 324.7                      | 169.7             | 52.2%           | 10.8            | 3.3%          |
| Galați               | 205.3                      | 87.1              | 42.4%           | 12.0            | 5.8%          |
| Gorj                 | 419.6                      | 155.8             | 37.1%           | 10.6            | 2.5%          |
| Mureș                | 208.4                      | 47.5              | 22.8%           | 2.2             | 1.1%          |
| Prahova              | 218.5                      | 170.3             | 77.9%           | 10.2            | 4.7%          |
| Technical assistance | 85.6                       | 35.6              | 41.6%           | 7.1             | 8.3%          |

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Source: European Commission, *Cohesion open data platform – Just Transition Fund (JTF), 2025*, Open Data Portal for the European Structural Investment Funds – European Commission, <https://cohesiondata.ec.europa.eu/funds/jtf/21-27#finance-implementation>.

Figure 11. Implementation of the Just Transition Fund in Romania



Source: European Commission, *Cohesion Open Data Platform, Just Transition Fund, 2021-2027, Finances: Implemented, 2025*, <https://cohesiondata.ec.europa.eu/funds/jtf/21-27#finance-implementation>.

The funds are not blended, meaning Romania relies entirely on the Just Transition Fund to finance its JT measures.<sup>175</sup> This reflects a broader challenge in Romania with fragmented financing, as different EU instruments are implemented independently rather than complementarily.<sup>176</sup>

<sup>172</sup> Ministry of Investment and European Projects (Romania), *Programul Operational Tranziție Justă*, 2022, <https://mfe.gov.ro/wp-content/uploads/2022/06/bb37f158742c4f685b453567484d4897-1.pdf>.

<sup>173</sup> European Commission, *Cohesion open data platform – 2021–2027- Finances: planned, 2025*, Open Data Portal for the European Structural Investment Funds – European Commission, [https://cohesiondata.ec.europa.eu/cohesion\\_overview/21-27](https://cohesiondata.ec.europa.eu/cohesion_overview/21-27).

<sup>174</sup> European Commission, *Cohesion open data platform – Just Transition Fund (JTF), 2025*, Open Data Portal for the European Structural Investment Funds – European Commission, <https://cohesiondata.ec.europa.eu/funds/jtf/21-27#finance-implementation>.

<sup>175</sup> Source: interview with Eliza Barnea, Just Transition Campaign Coordinator in Bankwatch Romania.

<sup>176</sup> *Ibidem*.

The planned allocation of money (approx. %) for the JTF in Romania is as follows:<sup>177</sup>

- economic policies (68% of the Fund) – ca. 61% SME's, 3% large companies, 4% employment/labour market,
- environmental policies (26%) – ca. 19% RES-based energy, 7% land development and other environmental projects,
- social policies – 0%,
- other – 6%.

Romania's partition of the Just Transition Fund has had a huge allocation for small and medium-sized enterprises, while other topics, like energy efficiency, have only been included in the revision of the Just Transition Programme since December 2025, following the new priorities of the Mid-Term Review. At the same time, it has been reported that the transfers to SMEs are often not clear (unknown projects, no monitoring) and many of them are to be overwhelmingly invested in the capitals of the counties, the main economic centres of each Just Transition regions. Meanwhile, the areas that are directly affected by economic change (the switch away from coal industry) do not see a proportionate level of investment and the spillover effect at the regional level is small.<sup>178</sup> Moreover, Romania has decided to take 266 million EUR from the allocation for startup companies and transfer them to the STEP mechanism, together with the sums foreseen for the decarbonisation of two large companies (the largest steel producer in Romania and the producer of mineral fertilisers for agriculture).<sup>179</sup> Additionally, also in December 2025, Romania introduced a small sum for start-ups in the Jiu Valley region.<sup>180</sup>

Romania also lacks allocations for social policies. In general, the TJTPs of Romania place a strong emphasis on social issues in terms of their content, especially in the two coal counties of Gorj and Hunedoara.<sup>181</sup> The plans indicate the necessity to focus on supporting entrepreneurial initiatives, including female and youth entrepreneurship, as well as on reskilling and upskilling measures. However, this has not been backed with a specific allocation aimed at relieving some of the social disparities in the local communities. Just mentioning social issues and social exclusion with regard to reskilling programmes will not be enough to combat the significant social inequalities that will become deeper as a result of the transition process.<sup>182</sup>

Finally, none of the plans offer a comprehensive approach to addressing the environmental impacts of the transition.

The Just Transition Fund (JTF) in Romania follows a centralised governance model, coordinated by the Ministry of Investments and European Projects in Bucharest and by the Regional Development Agencies (for the six regions included in the JTF programme). The Agencies play the role of intermediate bodies and are in direct contact with the county councils, which operate at the county level and hold responsibilities in communication, stakeholder engagement and alignment. While county councils play a role in governance, the decision-making process remains largely top-down, with significant influence from the national government.<sup>183</sup>

A notable exception is the area of Jiu Valley (in the Hunedoara region), which has a more local governance structure due to the Integrated Territorial Investment (ITI) instrument, allowing for greater flexibility and regional decision-making. This model has enabled Jiu Valley to push for tailored project selection and funding allocations that align with the specific needs of the region.<sup>184</sup>

177 European Commission, *Cohesion Open Data Platform – Just Transition Fund (JTF) 2021–2027, Finances:Planned, 2025*, <https://cohesiondata.ec.europa.eu/funds/jtf/21-27>.

178 Source: interview with Eliza Barnea, Just Transition Campaign Coordinator in Bankwatch Romania and Alexandru-Mihai Kelemen, Director for Jiu Valley Integrated Territorial Development Association.

179 Source: interview with Eliza Barnea, *op.cit.*

180 Source: interview with Alexandru-Mihai Kelemen, Director for Jiu Valley Integrated Territorial Development Association.

181 CEE Bankwatch Network, *Following the Money: Romania, 2023*, [https://bankwatch.org/wp-content/uploads/2023/12/2023\\_12\\_Following-the-Money\\_Romania.pdf](https://bankwatch.org/wp-content/uploads/2023/12/2023_12_Following-the-Money_Romania.pdf).

182 *Ibidem.*

183 Source: interview with Eliza Barnea, *op.cit.*

184 Source: interview with Alexandru Kelemen, Executive Director, Association for Integrated Territorial Development of the Jiu Valley.

## 6.2. A project to follow

### The “Robotics Valley” project

The “Robotics Valley” in the Jiu Valley is a project that originated from the idea of transforming former coal mines into spaces for personal and professional development, initially creating an informal robotics hub for high school students and young people in the Jiu Valley. Its main goal is to create an integrated, interdisciplinary programme, operating non-formally, for skills management in the STEAM (Science, Technology, Engineering, Art, Mathematics) fields among young people in the Jiu Valley.<sup>185</sup>

The project now brings together six dynamic robotics teams from all corners of the region. The project’s vision is to make this initiative a true emblem of progress for the area. Teams like AlphaBit from Petroșani are already engineering sophisticated robots that have earned awards on the national and international stage. Their achievements point to the real promise of robotics as a foundation for Jiu Valley’s future, moving well beyond its mining roots.

The project has been selected for the final phase of the European “New European Bauhaus” (NEB) competition, organised by the European Commission.

## 6.3. Public participation

As far as public participation in the planning and management of the Fund is concerned, it varies greatly between the central and regional levels, as well as between regions. At the local level, working groups for the coordination of the just transition process have been created in each county, under the County Council, including local authorities, NGOs, academia or representatives of the private sector. While the process was formally open, stakeholder engagement was inconsistent, with some monitoring committees showing greater inclusivity than others. For the sake of completeness, however, it should be noted that in some counties the absence of NGOs has not been due to bad will, but to the lack of presence or capacity of NGOs in these areas.<sup>186</sup>

Against this background, Jiu Valley stands out prominently, as civil society has played a particularly strong role there, thanks to the pre-existing NGO’s coalition – *the Engaged Jiu Valley*<sup>187</sup> – which was formed with the scope to support the local civil society and to work together for the social, economic, and cultural development of the region. The coalition did not know about the just transition process initially, but they have become deeply involved in the elaboration of the Strategy for the development of the Jiu Valley (made up of 6 towns) and of the JT Plan for Hunedoara County. They have also contributed considerably to the foundation of *the Association for Integrated Territorial Development of the Jiu Valley*<sup>188</sup> – the structure coordinating the ITI instrument in the Jiu Valley, JTF included. The association is formed by public authorities and civil society: 6 city halls, the county council, the University of Petrosani, and NGOs selected through a public competition organised by the Engaged Jiu Valley coalition.

<sup>185</sup> Robotics Valley, *Transition to a Jewel Valley*, n.d., Robotics Valley, <https://www.roboticsvalley.eu/verify.html>.

<sup>186</sup> Source: interview with Eliza Barnea, *op.cit.*

<sup>187</sup> Valea Jiului Implicata, *Implicati pentru dezvoltarea vaili jiului*, n.d., <https://www.valeajiuluiimplicata.org/>.

<sup>188</sup> *Ibidem.*

However, it seems that participation at the national level has been more limited and dominated by larger organisations.<sup>189</sup> While civil society could technically engage in monitoring committees, the decision-making process has remained highly centralised, with limited opportunities for local input to shape national strategies. One of the key issues has been the lack of meaningful engagement of smaller municipalities. Local governments have often hesitated to challenge national authorities, as their funding depends on central government decisions. This political dynamic has limited bottom-up advocacy, reinforcing the dominance of national decision-making.

The social dimension of the JTF has so far been weak. Although policies mention support for youth, vulnerable groups, minorities and energy poverty, in practice there is hardly any funding allocated directly to these priorities. Stakeholders have struggled to develop projects targeting these issues, but local capacity constraints have further hindered implementation.<sup>190</sup> At the same time, delays in JTF implementation have led to disenchantment among local communities, who have yet to see tangible benefits.<sup>191</sup>

#### 6.4. The Romanian JTF at a glance

Romania's JTF has supported the initial steps of the transition, while governance inefficiencies, delayed implementation and weak social investments have slowed its impact. A future JTF programme should provide regional and local authorities with more control over fund allocation and project selection (the Integrated Territorial Investment model in Jiu Valley could serve as a best practice for enabling regional autonomy). The next funding period should ensure clearer, earlier and more structured engagement with municipalities, civil society, and local businesses. Strengthening the social dimension will be essential: public funding should be linked to social and environmental responsibilities and policies on youth employment, energy poverty and gender inclusion should translate into dedicated funding mechanisms and measurable outcomes.

34 The need for better funds coordination is also apparent – future strategies should improve synergies between funding sources to maximise impact.

In Romania, deindustrialisation began in the 1990s (mainly in the Jiu Valley, but also in Gorj) and it has deeply affected the miners, their families and the local communities. Support must continue beyond 2027 to avoid recreating the social and economic costs of past industrial decline.

## 7. Spain

In Spain, the closure of coal mines in December 2018<sup>192</sup> was closely followed by the gradual closure of coal-fired thermal power plants. As of early 2026, the vast majority of 15 plants that existed a few years ago have already closed down or are in a process of being decommissioned. The remaining plants are not operating for commercial profits, but for strict technical security of supply or because they are in the midst of being converted to clean energy (based on renewables).<sup>193</sup> The energy transition is therefore at a very advanced stage compared to many of the other countries discussed in this report.

189 Source: interview with Alexandru-Mihai Kelemen, *op.cit.*

190 L. Popovici, *We don't know exactly what has been funded. The Romanian state, a dismal failure in attracting EU funds for the most polluted counties*, 2025, <https://pressone.ro/we-dont-know-exactly-what-has-been-funded-the-romanian-state-a-dismal-failure-in-attracting-eu-funds-for-the-most-polluted-counties>.

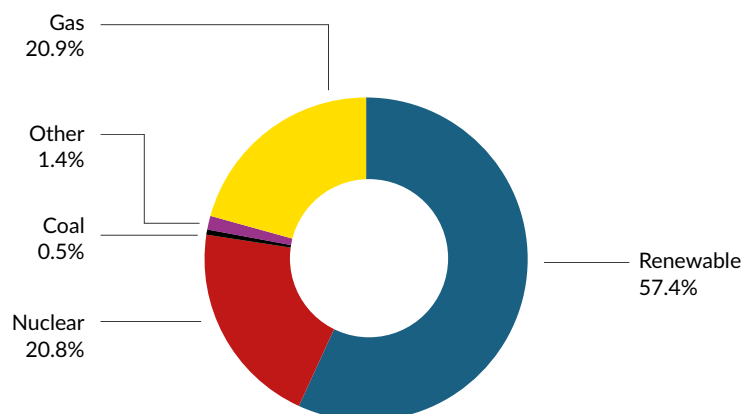
191 Source: interview with Eliza Barnea, *op.cit.*

192 European Commission, *State Aid SA.34332 (2012/NN) – Spain Aid to facilitate the closure of coal mines in Spain*, 2016, [https://ec.europa.eu/competition/state\\_aid/cases/244102/244102\\_1780173\\_276\\_2.pdf](https://ec.europa.eu/competition/state_aid/cases/244102/244102_1780173_276_2.pdf).

193 Just Transition Finance Lab, *Case study Spain's just transition energy tenders*, 2025, <https://justtransitionfinance.org/wp-content/uploads/2025/02/Just-Transition-Finance-Lab-Spain-case-study.pdf>.

Coal's share of the electricity generation mix fell from 21% in 2015 to less than 1% in 2025.<sup>194</sup> Over the same period, a significant increase in renewable energy has been observed, with solar power growing steadily from approximately 5% to over 21% and wind power from 20% to around 22%, making them key pillars of the electricity generation mix.<sup>195</sup> Gas reached its peak at 32% in 2019 before declining to around 21% in 2025.<sup>196</sup> Currently, nuclear power accounts for 21% of the electricity generation mix.<sup>197</sup> It is clear that the electricity mix has been significantly diversified in recent years, and coal has been replaced with various, mainly renewable, sources.

Figure 12. Spain's electricity generation mix in 2025



Source: Energy-Charts, *Public net electricity generation in Spain in 2025, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=ES&interval=year&year=2025&legendItems=010](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=ES&interval=year&year=2025&legendItems=010).

## 7.1. Financing and governance of the Spanish just transition

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The Spanish government introduced a legal framework for the JT process even before the country received support from the Fund. The Just Transition Strategy was approved in February 2019, together with the Climate Change and Energy Transition Law. The latter introduced the obligation to approve Just Transition Strategies every 5 years to update data and establish policies and action plans on the ongoing effects of decarbonisation.<sup>198</sup>

As set out in the Just Transition Strategy, the Just Transition Institute (ITJ) was founded in April 2020 to develop and implement the policies planned. Thanks to this, the institutional frameworks have been developed in parallel with measures addressing the most urgent challenges and needs.

<sup>194</sup> Energy-Charts, *Public net electricity generation in Spain in 2025, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=ES&interval=year&year=2025&legendItems=010](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=ES&interval=year&year=2025&legendItems=010).

<sup>195</sup> Energy-Charts, *Public net electricity generation in Spain in 2015, 2026*, [https://energy-charts.info/charts/energy\\_pie/chart.htm?l=en&c=ES&interval=year&year=2015&legendItems=4y1](https://energy-charts.info/charts/energy_pie/chart.htm?l=en&c=ES&interval=year&year=2015&legendItems=4y1).

<sup>196</sup> *Ibidem*.

<sup>197</sup> *Ibidem*.

<sup>198</sup> *Ibidem*.

Therefore, the context of JTF implementation is different in Spain than in many other countries.<sup>199</sup> The Fund complements measures and policies previously implemented by the country (in this respect,<sup>200</sup> a similar situation exists also in Germany). The JTF in Spain will mainly support the following coal-dependent regions: Asturias (ca. 30% of the Fund), Castilla y Leon (ca. 23%), Andalucía (ca. 18%), Galicia (ca. 13%), Aragón (ca. 11%) and Baleares (ca. 2%).<sup>201</sup>

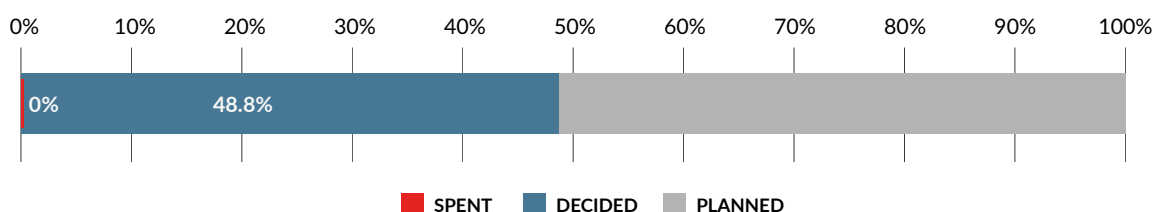
The total planned sum of money that has been allocated from the Just Transition Fund to Spain amounts to over EUR 868.7 million,<sup>202</sup> the ninth largest share in the European Union. However, the progress of the implementation has been very slow – only 48.8% of the funds have been allocated and nothing has been spent so far. Due to the previously described strategy adopted prior to the establishment of the JTF, the funding is blended with other EU sources (the Recovery & Resilience Facility) and national funds.

Table 7. Spain's Just Transition Fund distribution

| SPAIN'S EU JUST TRANSITION FUND DISTRIBUTION |                            |                   |                 |                 |               |
|--|----------------------------|-------------------|-----------------|-----------------|---------------|
| REGION                                       | GRANT ALLOCATION (MLN EUR) | DECIDED (MLN EUR) | DECIDED (SHARE) | SPENT (MLN EUR) | SPENT (SHARE) |
| A Coruña                                     | 111.4                      | 71.0              | 63.7%           | 0               | 0%            |
| Actuaciones transversales ITJ                | 34.7                       | 69.2              | 199.0%          | 0               | 0%            |
| Almería                                      | 51.8                       | 0.0               | 0%              | 0               | 0%            |
| Asturias                                     | 262.9                      | 183.3             | 79.6%           | 0               | 0%            |
| Cádiz  | 69.6                       | 6.5               | 12.8%           | 0               | 0%            |
| Córdoba                                      | 32.2                       | 0.0               | 0%              | 0               | 0%            |
| León   | 125,5                      | 49.3              | 28.7%           | 0               | 0%            |
| Palencia                                     | 71.6                       |                   |                 |                 |               |
| Teruel                                       | 91.7                       | 20.9              | 26.9%           | 0               | 0%            |
| Zona de Transición Justa de Alcadía          | 17.4                       | 6.0               | 36.8%           | 0               | 0%            |

Source: European Commission, *Cohesion open data platform – Just Transition Fund (JTF), 2025, Open Data Portal for the European Structural Investment Funds – European Commission*, <https://cohesiondata.ec.europa.eu/funds/jtf/21-27#finance-implementation>.

Figure 13. Implementation of the Just Transition Fund in Spain



Source: European Commission, *Cohesion Open Data Platform, Just Transition Fund, 2021–2027, Finances: Implemented, 2025*, <https://cohesiondata.ec.europa.eu/funds/jtf/21-27#finance-implementation>.

<sup>199</sup> The decision to implement just transition and the entire concept of doing it were made and introduced before Spain requested and received the JTF.

<sup>200</sup> Ministry for Ecological Transition and Demographic Challenge (Spain), *Green light to distribute the €868 million in aid under the European Just Transition Fund*, 2022, [https://www.miteco.gob.es/es/prensa/ultimas-noticias/2022/12/via\\_libre\\_para\\_distribuirlos868millonesenayudasconcargoaleuropeo.html](https://www.miteco.gob.es/es/prensa/ultimas-noticias/2022/12/via_libre_para_distribuirlos868millonesenayudasconcargoaleuropeo.html).

<sup>201</sup> Ministry for Ecological Transition and Demographic challenge (Spain), *Just Transition Strategy – Just transition fund*, n.d., Fondo de transición justa; and table 8, <https://www.transicionjusta.gob.es/es/la-transicion-justa/fondo-de-transicion-justa-ue2.html>.

<sup>202</sup> European Commission, *Cohesion open data platform – 2021–2027, Just Transition Fund (JTF), Finances: planned, op.cit.*

The planned allocation of money (approx. %) for the JTF Spain is as follows:<sup>203</sup>

- economic policies (59% of the Fund) – ca. 36% SME's, 7% large companies, 14% retraining/upskilling, 2% employment,
- environmental policies (19%) – ca. 7% RES-based energy, 4% land development and 5% other environmental projects,
- social policies (10% of the Fund) – ca. 6.5% R&D&I in public sectors, 2.5% education, 1% public tourism,
- other – 12%.

The allocation shows that within the scope of Spain's JTF, the primary emphasis has been placed on economic issues, with particular attention paid to SMEs. The enterprises are to receive support in terms of business development, digitalisation, clean technology, environmentally friendly production processes, business infrastructure, energy efficiency and Information and Communications Technology (dedicated funding is also planned for the tourism sector). Furthermore, funds have been allocated to environmental projects (primarily RES development), but the allocation here has been much smaller. The least funds have been allocated to social objectives.

Only 2% of the Spanish JTF allocation has been directed towards employment measures, a small share compared to other priorities. This is significant in light of Spain's history of high unemployment, especially among the youth. The economic crisis of 2008 led to significant job losses in Spain, while many of the jobs created afterward have been in precarious conditions.<sup>204</sup> These factors have contributed to rising inequality and shifts in poverty and social exclusion patterns.<sup>205</sup> Although unemployment has improved significantly over the last dozen or so years, with a rate of 10.4% in July 2025, Spain still has the highest number of unemployed people in the EU.<sup>206</sup> It therefore appears that an attempt to solve this problem within the JTF has been the allocation of part of the funds to business development, particularly for small and medium enterprises.

At the same time, it needs to be stressed that the figures provided here for the JTF should be analysed in the context of the overall just transition process in Spain. An additional budget of 300 million EUR from the Recovery and Resilience Spanish Plan has been allocated to just transition, of which 150 million has gone to environmental restoration of land degraded by coal mining, 91 million to infrastructures for municipalities in just transition areas, 30 million to R&D&I projects in hydrogen and energy storage, and 9 million to training and reskilling programs for the unemployed in just transition areas.<sup>207</sup>

While the Just Transition Institute has been coordinating the policy, 96% of the JTF funding has been managed by the regions, with only 4% under the JTI for direct calls targeting SMEs in the most affected municipalities.<sup>208</sup>

At the same time, the Just Transition Agreements (JTAs) remain a key governance too.<sup>209</sup> requiring national, regional, and local governments to collaborate with trade unions and civil society to create transition plans for affected areas.<sup>210</sup>

<sup>203</sup> European Commission, *Cohesion open data platform – 2021–2027, Just Transition Fund (JTF), Finances: planned*, op.cit.

<sup>204</sup> The Social Observatory, *The evolution of employment precarity among young people in Spain, 2008–2018*, 2021, <https://elobservatoriosocial.fundacionla Caixa.org/en/-/the-evolution-of-employment-precariety-among-young-people-in-spain-2008-2018>.

<sup>205</sup> *Ibidem*.

<sup>206</sup> Eurostat, *Euro area unemployment at 6.2%, 2025*, <https://ec.europa.eu/eurostat/web/products-euro-indicators/w/3-01092025-ap#:text=EU%20at%205.9%25-,Overview,thousand%20in%20the%20euro%20area>.

<sup>207</sup> Ministry for Ecological Transition and Demographic Challenge, *Spain, 4 years towards a just energy transition*, 2023, op.cit.

<sup>208</sup> Ministry for Ecological Transition and Demographic Challenge, *Just Transition Strategy – Just Transition Fund*, op.cit.

<sup>209</sup> Law 7/2021 of 20 May on Climate Change and Energy Transition, *Official State Gazette of Spain (BOE)*, BOE-A-2021-8447, 21 May 2021, <https://www.boe.es/buscar/act.php?id=BOE-A-2021-8447>.

<sup>210</sup> Ministry for Ecological Transition and Demographic Challenge, *Aid for companies in just transition areas*, n.d., <https://www.transicionjusta.gob.es/es/ayudas-a-empresas/ayudas-a-empresas-transicion-justa-.html>.

## 7.2. A project to follow

### Just Transition Tenders in Spain

The Just Transition Tenders in Spain, of which 5 have already been launched: Mudéjar (Teruel), La Pereda (Asturias), Lancha (Córdoba), Meirama (Galicia) and Narcea (Asturias) focus on converting the local coal-fired power plants closures into opportunities for the territories. Access of renewable energy to the electricity grid is granted depending on the accompanying projects for the development of economic activities and job creation in affected territories.

The tenders include projects to accompany the territories affected by the closures, such as:

- in agriculture, cultivation projects and biomass logistics,
- in industry, solar and wind value chain components factories,
- in the service sector, tourism, training, services to local population and others.<sup>211</sup>

This is a range of challenging initiatives, which aim to make the energy transition an opportunity for promoting the local economy and community development.

The Mudéjar project in Andorra (Teruel) has already won the attention of the BBC and received a prestigious Changemakers award in the Renewables category at COP28 in Dubai.<sup>212</sup>

## 7.3. Public participation

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A relatively strong participatory process is perhaps one of the key strengths of Spain's just transition implementation. Stakeholders have been involved continuously (for the planning, implementation and monitoring phases) and a wide range of civil society actors have been included.<sup>213</sup> Special effort has been made to engage communities – the JTI conducts territory-wide tours to explain aid lines and support small municipalities with limited capacity. The Institute has also maintained a network of field officers, acting as a two-way communication channel with local populations.<sup>214</sup> However, representatives of civil society have perceived the process somewhat differently. They admit that regions, municipalities and business actors are well targeted, but civil society involvement could be further strengthened. For instance, civil society representation in the JTF Monitoring Committee could be larger. Though some CSOs are present, the Committee has remained unbalanced, with a dominant number of national and regional government officials<sup>215</sup> Organisations can apply for project funding, but small and medium-sized enterprises (SMEs) have dominated among the beneficiaries, as funding priorities have emphasised economic restructuring over social aspects.<sup>216</sup> The Just Transition Agreements encourage stakeholder involvement, but effectiveness may vary by region. Participation gaps have existed at the regional level, where civil society has not been formally involved in the management of just transition funds.<sup>217</sup>

<sup>211</sup> Just Transition Finance Lab, *Case study Spain's just transition energy tenders*, 2025, [https://justtransitionfinance.org/wp-content/uploads/2025/02/Just-Transition-Finance-Lab\\_Spain-case-study.pdf](https://justtransitionfinance.org/wp-content/uploads/2025/02/Just-Transition-Finance-Lab_Spain-case-study.pdf).

<sup>212</sup> Enel Green Power, *Andorra's just transition project wins award at COP28*, 2023, <https://www.enelgreenpower.com/media/news/2023/12/andorra-project-award-cop28>.

<sup>213</sup> Source: Spanish stakeholders interviewed for the sake of this publication.

<sup>214</sup> Ministry for Ecological Transition and Demographic Challenge, *Spain, 4 years towards a just energy transition*, *op.cit.*

<sup>215</sup> *Anexo I: Miembros Del Comité De Seguimiento Del Programa Del Fondo De Transición Justa De España 2021 – 2027*, n.d., <https://fondoseuropeos.gob.es/es-es/fondosprogramas/ftj/SiteAssets/Paginas/gestion/ANEXO%20I-MIEMBROS%20CdS%20FTJ.pdf>.

<sup>216</sup> Ministry for Ecological Transition and Demographic Challenge, *El ITJ convoca ayudas por 28 millones para proyectos empresariales que impulsen el desarrollo económico en zonas de Transición Justa*, 2025, <https://www.miteco.gob.es/gl/prensa/ultimas-noticias/2025/junio/el-itj-convoca-ayudas-por-28-millones-para-proyectos-empresarial.html>.

<sup>217</sup> Source: Spanish stakeholders interviewed for the sake of this publication.

As regards vulnerable groups, there are projects which have given preferential treatment (bonus points) to those hiring women, youth or former coal workers and they are based on tenders described in the “A project to follow” section of this chapter. This has been a good practice and a positive development, but some more active outreach to these groups would also be welcomed.<sup>218</sup>

#### 7.4. The Spanish JTF at a glance

Stakeholders recognise fundamental advantages of the Just Transition Fund, such as the strong territorial focus, greater flexibility and higher co-financing rates compared to the ERDF.<sup>219</sup> However, they also highlight various recommendations and improvements for the future shape of the Fund. Some believe that the creation of a separate fund has led to excessive governance complexity and the need for parallel administrative structures, so the future governance could be simplified by integrating JTF into the ERDF. In any case, a mandatory allocation for Just Transition objectives, should remain. In such a case, the Fund should still retain its advantages (co-financing, eligibility scope, flexibility). For the representatives of civil society organisations, it remains most important to continue support for regions still undergoing transition and to prioritise environmental restoration and social inclusion. Some emphasise that future JTF programming could be more locally rooted, participatory, and needs-based. The Fund should empower marginalised communities to initiate and lead projects rather than be passive beneficiaries. One of the tools for achieving this goal would be to simplify access for small-scale actors by lowering financial thresholds and co-financing requirements. The implementing authorities should switch from purely merit-based project selection to approaches that also prioritise community needs and social impact.

## 8. Conclusions and recommendations

The Just Transition Fund has become an indispensable instrument for supporting coal-dependent regions in navigating their transformation. Its dedicated character, frequently to regions in multi-decade industrial and demographic decline, territorial focus, flexibility to combine hard and soft investments, as well as its ability to respond quickly to the changing circumstances distinguish it from other EU funds.

**The Just Transition Fund has played a crucial role in helping coal-dependent regions navigate transformation, fostering trust among the local communities, encouraging long-term planning, and regional ownership. Its flexibility, combining a thematically and geographically narrow scope with a special territorial focus, has aided in moving the coal phaseout process forward.** Despite various challenges and difficulties in its implementation, it has proven to be transformative in many ways, leading to breakthroughs not limited only to structural and infrastructural changes, but most importantly—in people’s mindsets, including both the managing authorities and the general public.

It can be argued that **the most effective governance structures for implementing just transition combine:**

- well-thought-out EU level frameworks and funding streams,
- national level long-term planning and financing,
- strong local and regional level input and participation.

While there are many areas for improvement as far as the JTF implementation is concerned, it should be emphasised that the Just Transition Fund has achieved at least two very important objectives: (I) creating clear timelines for coal phaseout that are being acted upon, and (II) gaining regional buy-in to the transformation process, even in countries with opposing political narratives, such as Poland.

<sup>218</sup> *Ibidem.*

<sup>219</sup> *Ibidem.*

The examples from Spain, Greece and Germany clearly show that the EU Just Transition Fund functions only as supplementary financing in countries that have on their own created a clear long-term plan for their transitions. Spain, Greece and Germany have created their own policy and financial frameworks and planning processes and have to various degrees included the regions within them. The EU governance structure and financing only supplement what they have at the Member State level. For this reason, the amount of decided and spent resources in these countries can be seen as low, with Spain and Germany having a 0% and 5.9% average JTF spending rate respectively. However, it is interesting to note the Greek case within this context, as despite already having a relatively well-developed national planning process initiated as early as 2020, it is taking advantage of the JTF and 50% of these dedicated funds have been allocated.

The examples from central and eastern Europe show that it was the Just Transition Fund that led to the first creation of energy transformation timelines and plans. In many cases they were not later transposed fully into such documents as the National Energy and Climate Plans. In some cases national-level plans for energy transformation and just transition remain vague or are in fact non-existent, e.g. Poland with a lack of clear national just transition planning and ministerial guidance or coordination.

In such cases, it has frequently been the regions themselves that have led the just transition process, again with Poland as an example of this. At the national level, transformation plans remain insufficiently developed and fail to accurately reflect the pace at which coal phase-out is likely to occur. In contrast, the Territorial Just Transition Plans are more concrete and ambitious, and have provided a more accurate representation of regional conditions, as they have been developed locally with relatively strong stakeholder involvement.

The rate of contracting in Poland has also progressed well and generally meets EU requirements for absorption of resources. It results from the fact that the regional managing authorities have had many years of experience in implementing regional EU funds and have been able to relatively quickly implement the JTF. On the other hand, countries like Romania have not had such experience and the blockage of spending has been mostly at the national level. For Czechia, fund spending and governance has been largely centralised at the national level, with involvement of primarily public authorities and large companies at the regional level. This would thus explain its lower focus on smaller socially-targeted projects, more typical for just transition processes where the planning involved broader groups of local stakeholders.

This case study analysis shows that to understand the greatly varied level of JTF spending rates across different EU Member States, it is necessary to address this matter in greater depth and to study the reasons for this situation with respect to each country individually. The JTF has been implemented successfully without major obstacles in certain countries (e.g. most Polish regions or Czechia), while in others – the delays or low spending rates have been due to a wide variety of factors, including a lack of administrative capacities or experience, limited or no political will at the national level, or an overabundance of other available funding sources. Thus, any assessment of the success of the JTF should not be based solely on the numerical outcomes, but rather on an in-depth evaluation of each individual case.

One definite area for improvement in the future would be to take greater advantage of the possibility of supplementing such dedicated funding streams as the JTF with other EU funds (such as the ESF+, ERDF, MF in the current funding horizon), which was clearly not achieved in most of the countries we covered in our briefing. An exception would be Spain, which has attempted to take advantage of all available funding streams to ensure the transition proceeds as seamlessly as possible (and is perhaps why it has such slow spending rates of the JTF itself). However, such an approach requires a clear strategy for planning the energy transformation process at the national level with allocation of the available funds (both the EU and national ones) to cover the various issues identified as essential. To conduct such a challenging process, a clear diagnosis of the current situation in the regions and countries is needed alongside an overview of the predicted impacts of the transition.

It should be underlined that **developing truly transformative concepts and projects requires time, expert skills and knowledge, capacities, and broad social participation**. Transition planning processes are lengthy and time-consuming. The preparation of Territorial Just Transition Plans specifically addressing the impacts of the transition at the regional level were only completed in 2022, while appropriate national-level transformation strategies, such as the National Energy and Climate Plans, were finished in some cases in 2023 or 2024.

For those countries that initiated national planning processes much earlier (Germany, Spain and Greece), the TJTPs allowed primarily for the development of a more concrete approach from a territorial perspective, but much work remains to be able to address the economic, social, employment and environmental impacts of the transition.

From the examples provided by the various projects that have been presented in this publication, it can be observed that many of them are only now being implemented and will be completed in a few years. The development of transformative projects also requires time, patience, expert knowledge and skills, and capacities for developing, administering and running projects. The provision of dedicated technical assistance to the regions has addressed this very need.

Moreover, the above analysis shows that **the just transition funding and setup can support and strengthen phaseout commitments and planning, as well as aid transition processes. Its disappearance or dilution could lead to backtracking on phaseout commitments and social backlash.**

It is obvious that in all of the countries covered by the Just Transition Fund, specific phaseout dates were set, in some already much earlier in national level plans (e.g. Germany, Greece or Spain), while for others, they first appeared in the Territorial Just Transition Plans (e.g. for Poland or Czechia), which were then to various degrees transposed to national-level strategic documents, such as the National Energy and Climate Plans.<sup>220</sup> It can also be observed that the coal phaseout process has moved forward rapidly in recent years, as can be easily observed in figure 1 of the introduction. While it cannot be seen as the only reason for this acceleration, the Just Transition Fund has been an important tool for bringing on board local communities and companies. There are numerous examples of regions, especially in central and eastern Europe, only initiating talks about coal phase out following the promise of a dedicated funding stream (e.g. most regions in Poland). When it was introduced, it became a crucial element of the package for mitigating the phaseout process in many of these countries, e.g., Poland, Czechia or Romania.

**Discontinuing dedicated, just transition funding in the next EU Multiannual Financial Frameworks (EU MFF) would run the risk of losing the momentum gained, the EU's credibility and the public trust for the process.** As just transition is a multi-decade process, with many territories currently supported by the Just Transition Fund having scheduled their phase-out dates well beyond 2027 (e.g., Spain, Poland, Germany, Romania, Czechia), restricting earmarked support to a single programming period (2021–2027 MFF) would risk leaving regions mid-transition without the needed resources to complete it. It would also be highly discouraging for stakeholders, could deepen social frustration and undermine trust for the European Union, as the actual transformation and its consequences will mostly not be felt until the early 2030s. The Just Transition Fund has been perceived as a long-awaited support instrument aimed at addressing – not only structural changes, but most importantly – the socio-economic aspects of the energy transition.

Ensuring that there is a dedicated, earmarked just transition stream in the next EU MFF is key not only for keeping the long-term commitment but also for delivering on the promise made in 2021 that no one will be left behind in the process. Continuing the just transition funding post-2027 is therefore essential for the success of the energy transition in Europe and for maintaining public support for the transition toward climate neutrality. **A long-term commitment to dedicated funding for just transition therefore remains essential.**

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Note that in Romania, the coal phaseout commitments were adopted around the same time in 2022 in the TJTPs and in the Recovery and Resilience Plan.

## 8.1. Recommendations

On 16 July 2025, the European Commission presented a proposal for the new Multiannual Financial Framework – a long-term EU budget for 2028–2034. It is reported to be worth nearly EUR 2 trillion and will be further negotiated by the European Parliament and the Member States. In the primary version published at the time of this publication, the Just Transition Fund is no longer an element of the long-term EU budget for 2028–2034.

While introducing the European Green Deal and presenting the JTF as a tool to address the socio-economic consequences of the transition to climate neutrality by 2050, the European Commission has promised to leave no one behind.<sup>221</sup> Taking both this into account and the main findings collected in this report, the following recommendations can be made.

**1. Maintain dedicated just transition funding post-2027 and keep the long-term commitment regarding continued support for regions in transition!**

Keeping the promise of leaving no one behind in the energy transition process should remain the priority of both the European Union and the national governments of the Member States. If a dedicated just transition stream is not included in the next EU MFF, it is recommended to ensure that there is an earmarked just transition envelope within the National and Regional Partnership Plans. Funds should be allocated based on transparent, clear and specific criteria and indicators (as in the current Just Transition Fund regulation), ensuring that resources will reach the most vulnerable communities and territories. The credibility of the EU's commitment to a just energy transition can only be preserved if the existing momentum can be maintained. Regions in transition need to be reassured that the European Union will continue supporting them post-2027 and that the promise given in 2021 when the Just Transition Fund was announced was not just a slogan.

**2. Just Transition support should be better aligned across all levels—from the EU through the national to the regional/local**

Clear, well-aligned and comprehensive EU frameworks and funding streams should lead to long-term national energy transformation plans. These in turn should present clear timelines and priority areas of intervention (e.g., in this case just transition regions) that are prepared with high regional/local participation and decision-making possibilities. In addition, such regions should have dedicated funding supplemented by national financing, while also being allocated priority within other available EU funding streams that can support various elements of such large-scale transitions, e.g., modernising grids, transforming district heating systems, etc.

**3. Introduce performance-based continuation of JT funding**

Countries and regions that have done well within the current funding period (2021–2027) should not be penalised for those that are struggling. Improvements aimed at increasing the speed and quality of spending should be based on more in-depth analyses that delve into the concrete reasons for such issues in specific countries and how these can be tackled by changes in the policy frameworks and through appropriate funding approaches.

**4. Support quality transformation projects**

Truly transformative projects require time and effort to develop. These should be treated as innovations or pilot projects and be provided with additional technical assistance, expert support, and time so that they can develop fully. Such projects are not always large-scale projects that can be implemented swiftly, but often complex decarbonisation, environmental or social projects with impacts that will span beyond a single budgeting period, hopefully leading to the future replicability and scalability of similar transformative projects.

## 5. Build capacities for transition

As indicated in the conclusions above, the transformation of industries, economies and communities is a difficult process, which requires a long-term increase of the capacities for implementing change. It is necessary to do this through the continuous provision of technical assistance, the expansion of administrative and technical capacities for the implementation of innovative and transformative solutions, dedicated funding for pilot projects, and expert support. To quote the Czech strategy for restructuring its coal regions, RE:START, *“there is a need to support not only specific projects, but also institutions in the regions. Furthermore, reliability and long-term planning of support programmes is essential, so that regional actors can build the necessary capacity to effectively implement innovative activities”*.<sup>222</sup>

## 6. Ensure a territorial approach to address the local needs of the regions

Maintaining a place-based approach, preferably at the NUTS3 level, while supporting regions in transition is essential to address their specific needs, provide tailored solutions, focus on concrete problems, and take into account local conditions. Adopting Territorial Just Transition Plans or other holistic regional development strategies should remain a requirement while applying for dedicated just transition funding in the next EU MFF. It would ensure that the most vulnerable regions use resources effectively, address the most pressing issues, while pursuing well-planned, long-term visions for development.

## 7. Maintain flexibility in combining hard and soft measures

The Just Transition Fund's characteristic of supporting both hard and soft measures within a single project has proven to be one of the greatest JTF advantages. Combining physical investments in infrastructure or economic diversification with socially-oriented initiatives, such as training or capacity building, allow regions to prepare both the general public as well as infrastructure and economic landscapes for future needs.

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## 8. Reinforce a strong partnership principle

Ensuring the active engagement of various stakeholders in the transition process is essential for making it truly just and beneficial for the whole community of a given territory. The direct involvement of different groups, including (but not limited to) workers, trade unions, civil society and non-governmental organisations, youth, universities, industry and SME representatives, and local residents strengthens ownership while making the process more transparent and understandable for all parties. Reinforcing a strong partnership principle is important at all stages—from drafting TJTPs or local development strategies, to fund implementation and monitoring. Only then can the just transition process be effective and align territorial needs with EU objectives. Participatory mechanisms should be universal across Member States but there should be flexibility in using the already existing structures and in encouraging new ones in order to adjust the situation to the local context. Monitoring committees should remain in place and maintain their representative composition. Stakeholders should be supported and, if needed, their capacities should be further strengthened to ensure that all of the interested parties can participate in the process on an equal basis.

**9. Emphasise the social dimension**

The key characteristic of the current JTF is its ability to address different aspects of the energy transition, including the potential social consequences of the transition toward climate neutrality. Emphasising the social dimension even further is important in order to truly leave no one behind in the process and to take into account the needs of local communities and the most vulnerable groups. Focusing on people-centred measures, supporting reskilling and training programmes, wide educational opportunities, and building the capacity of residents of regions in transition is crucial for the success of the energy transition.

**10. Improve transparency and enhance visibility and traceability of the EU contributions**

Local communities of regions in transition should be well informed about the EU contributions to their territories, as well as about the scope and means to benefit from the funds provided by the European Union. Improving the transparency of the process, investing in educational and information campaigns, enhancing the visibility and traceability of the EU resources could be of help in building trust in the process and in acknowledging that many regions could not undertake a just transition without EU support. Showcasing the EU's long-term commitment in the transition toward climate neutrality, paired with ongoing assistance to the most vulnerable territories and groups, could greatly benefit the EU's image in the regions that often face highly nationalistic and anti-EU sentiments.

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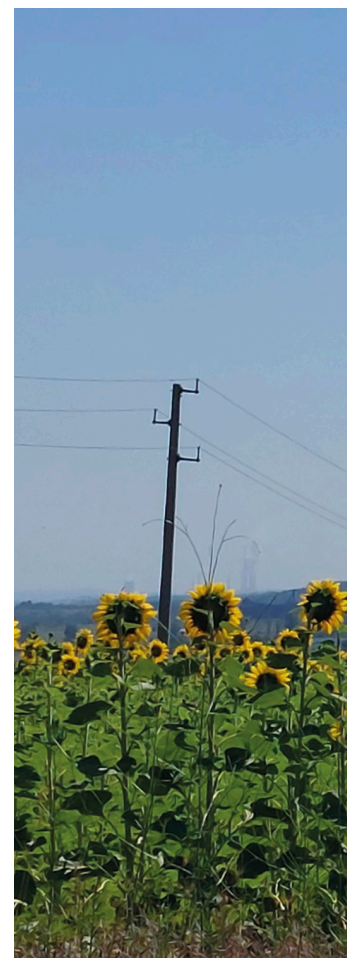








# To be or not to be continued? Analysis of the Just Transition Fund implementation across six EU countries



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