



Assessment for Bulgaria (Stara Zagora)

Status: Draft Plan

Date of plan: 02.08.2022



Overall Plan Rating

There are also some indicators rated as not consistent with the just transition. These are marked as red on the traffic light system and should be the foremost priorities to address and improve on. The indicators are organised under their corresponding principles in the Annex to this report.

Performance of TJTP by principle



Principle 1: The TJTP should be sustainable and deliver on long-term, international and EU climate commitments such as the Paris Agreement and EU 2030 and 2050 climate objectives.



Principle 2: The TJTP should not lead to prolonged fossil fuel use or promote false solutions to the transition to climate neutrality. As a guide, coal should be phased out by 2030.



Principle 3: The TJTP should lead to sustainable economic diversification at the local, regional and national level.



Principle 4: The TJTP should address social inequalities, improve interregional solidarity, decrease inequalities and tackle injustices.



Principle 5: The TJTP should not harm EU environmental and climate objectives and values.



Principle 6: The TJTP should respect the polluter pays principle.



Principle 7: The TJTP should be supported by adequate, coordinated and long-term public and private funding sources.



Principle 8: The TJTP should be designed, monitored and evaluated through meaningful partnerships which engage all stakeholders in an open, inclusive and ongoing process, especially at local level. Social dialogue and collective bargaining should be central pillars of the transition when it comes to the labour market and enterprises.



Principle 9: The TJTP should take a place-based, local approach to strategy design and implementation.



Principle 10: The TJTP should be developed based on high quality, independent and objective analysis of the challenges and opportunities of the transition for regions.

Breakdown by indicator



Principle 1

The TJTP should be sustainable and deliver on long-term, international and EU climate commitments such as the Paris Agreement and EU 2030 and 2050 climate objectives.



Indicates a commitment to reduce GHG emissions but by < 55% emissions reduction versus 1990 levels by 2030 OR it does not indicate a need to reduce emissions at all



Identifies the opportunities to increase renewable energy in the region and specific actions, projects or targets are proposed



Does not Identify the opportunities to increase energy efficiency or reduce energy use in the region or nationally
Comments: No focus on energy efficiency in the wider Stara Zagora region.



Principle 2

The TJTP should not lead to prolonged fossil fuel use or promote false solutions to the transition to climate neutrality. As a guide, coal should be phased out by 2030.



A phase-out of coal is planned or implied (the fossil fuel is recognised as in terminal decline), but the end date is after 2030 or undefined



No phase-out of fossil gas is planned or implied

Comments: A fossil gas investment for the Maritsa TPPs was withdrawn from the NRRP, however, no explicit phase-out of gas in the wider region (e.g. industrial parks) identified.



Does not propose to phase out fossil fuel subsidies, or even proposes to introduce new or increase existing ones



Principle 3

The TJTP should lead to sustainable economic diversification at the local, regional and national level.



Promotes economic diversification, but there is no consideration of the need for new industries to be sustainable

Comments: While most of the targeted investments are in sustainable industries (RES, batteries, green hydrogen, biogas), the Pillar 3 measures on economic diversity focus on broad heavy industry development for the region.



Recognises the value of SMEs and start-ups for economic diversification, but does not set out clearly how it will provide support to develop and incentivise them



Indicates a link to and a need for consistency with the NECP, but does not clearly link investments for sustainable economic diversification and decent job creation to it

Comments: The Bulgarian NECP does not factor clear coal transition and needs to be updated.



Principle 4

The TJTP should address social inequalities, improve interregional solidarity, decrease inequalities and tackle injustices.



Justifies why certain regions should receive support with reference to the underlying economic and employment impacts of the transition, and justifies the choice objective criteria or comparative data



Prioritises employment support and job search assistance for workers directly losing their jobs as a result of the transition AND other worker groups, including those who may be indirectly affected

Comments: Economically disadvantaged groups and youth are identified with more unskilled jobs open for requalification activities in the lignite open pit mines.



Identifies some of the existing and future skills, training and education gaps at regional level on the basis of objective and quality skills forecasts, or sets out a process to identify them - but focuses on a limited range of sectors or only on workers directly affected by the transition or who have already lost their jobs

- Foresees only insignificant or non-specific actions and investments to address these gaps and ensure sufficient and decent, sustainable and resilient jobs, or focuses only on reskilling workers directly affected by the transition
 - ✔ Includes programme specific indicators (section 2.5) to measure the uptake of skills courses or training

Comments: Foresees the creation of 12 000 jobs, but many of them are associated with the recultivation of the lignite pits.
- Recognises the risk that new jobs created don't offer the same quality or wages as jobs in declining industries and the need to include measures to tackle this, but doesn't consider all factors of decent work, such as access to collective bargaining, or safe, healthy working conditions and reasonable working hours
- Recognises some inequalities and identifies some measures to address those arising from the transition, such as a minimum income support, energy poverty reduction or early pensions. But the TJTP does not consider existing inequalities or address all inequalities identified with planned measures
- Identifies the potential changes to quality of life arising from the transition and includes some targeted measures to address residual negative factors, such as air and water quality issues

Comments: Only limited recultivation activities of the directly affected lignite area included, with much higher risks to air and water quality, especially with regard to residual particulate and toxic pollution not sufficiently addressed.
- makes reference to the importance of supporting gender equality but does not propose any dedicated activities or priorities to achieve this

● Principle 5

The TJTP should not harm EU environmental and climate objectives and values.

- Does not include activities which would negatively impact environmental and biodiversity indicators relating to:
 - Biodiversity
 - Air pollution
 - Accessible greenspace (land take)
 - Water quality

AND neither does it include significantly harmful activities as defined by the EU Taxonomy or which would lead to unsustainable use of natural resources or which would lead to ecosystem harm

Comments: No fossil fuel infrastructure or other significant conversion of greenfield included with recultivation of the lignite pits supporting environmental improvement.

- Foresees investments in infrastructure which could indirectly lead to greater greenhouse gas emissions and fossil fuel-based activities, such as motorways (if alternatives such as railway investment have not been explored) and internal combustion engine manufacturing facilities

Comments: Some hydrogen and biogas infrastructure could potentially be used, as well as industrial park and production development could be used to support fossil fuel infrastructure.

- Identifies actions or possible activities to improve some biodiversity and environmental indicators. These activities and actions cover at least one of the following categories:
 - Biodiversity
 - Air pollution
 - Accessible greenspace (land take)
 - Water quality

Comments: RCR 38 and 52 only envision 600 ha under recultivation as mining is planned to continue beyond the 2029 date of the plan.

- Foresees no new investment in waste incineration or landfill capacity.

AND

Includes or prioritises new activities which would favour a circular, rather than a linear economy and which will not increase greenhouse gas emissions.

● Principle 6

The TJTP should respect the polluter pays principle.



The TJTP identifies - or commits to identify - the entities responsible for existing environmental damage, but does not establish how the Polluter Pays Principle will be respected when making investment decisions

Comments: The vast damages of Maritsa open pit lignite mining might not be covered by the existing funds and inventorying of the available finance is urgently needed.



Principle 7

The TJTP should be supported by adequate, coordinated and long-term public and private funding sources.



EU funds and national public funds are identified to support the just transition: other sources of public funding than the Just Transition Fund and the Pillar III of the Just Transition Mechanism are identified, including national sources. Funding sources are targeted to the most appropriate activities or to address funding gaps

Comments: NRRP complementarity identified with regard to RES and battery investments in the Maritsa basin.



Private funding sources are not identified and public funding appears to be the sole source of funding identified for the activities and the investments outlined in the TJTP

Comments: Urgently needed to re-evaluate the availability of private investor funds.



Principle 8

The TJTP should be designed, monitored and evaluated through meaningful partnerships which engage all stakeholders in an open, inclusive and ongoing process, especially at local level. Social dialogue and collective bargaining should be central pillars of the transition when it comes to the labour market and enterprises.



A coordination body is established but membership of the coordination body requirements and composition may be unclear.

AND / OR

Details on procedures are vague without transparency on timing and schedules for such meetings, or on how, when or where information on process and relevant documents will be published in an accessible place. Alternatively the majority of information must be directly requested from the institution responsible rather than openly available.

Comments: unclear structure and mandate of coordination body, despite good track record of community-based development initiatives in the Stara Zagora region.



Includes no identification of stakeholders, their roles and status in the process

OR

Includes an incomplete identification of stakeholders, missing key groups and which is inconsistent with the comprehensive list identified in Article 3 of the European Code of Conduct on Partnership, even if roles and status of the stakeholders identified in the process are indicated



Concrete detail on stakeholder engagement plans (e.g. meeting and consultation schedules and arrangements), as well as provisions to address stakeholder capacity-building needs

AND the TJTP includes sufficient details on how stakeholders have or will be involved in the preparation, implementation, monitoring and evaluation of the TJTP and how their views and inputs were integrated into the final plan

✓ The plan recognises the need to support capacity building of some stakeholders, particularly those with limited resources, to enhance their engagement



Skip, it is too early to say/don't know



Tripartite social dialogue is part of the planning process. At least some labour unions and social partners have been engaged in social dialogue during the development of the TJTP. Social dialogue is conducted to address the impacts of the transition on sectors which are phasing out and transforming, but not necessarily for emerging sectors.

Comments: Unfortunately and especially for Stara Zagora region most tripartite bargaining has been focused on prolonging the TPPs' life rather than planning the actual transition.



Principle 9

The TJTP should take a place-based, local approach to strategy design and implementation.



Identifies NUTS 3 regions which will require targeted action and prioritises measures for the specific NUTS 3 regions concerned



Notes the need for community engagement and acknowledges existing or planned community initiatives, but does not indicate how these will be integrated into the TJTP or how the community will be engaged and informed

Comments: only youth engagement activities identified.



Principle 10

The TJTP should be developed based on high quality, independent and objective analysis of the challenges and opportunities of the transition for regions.



The indicators and/or data included in the TJTP are high quality, focused at the regional level and are appropriate to the goals of the fund to address the socioeconomic challenges arising from the transition to climate neutrality, but do not cover all aspects of the just transition, focusing for example on the energy transition only

Comments: Relevant indicators but values not sufficiently ambitious.



The TJTP foresees a revision process by the Member State but the process is vague, for example it does not include a date, or an evaluation of implementation so far

Comments: More detail needed.

Attachment: [02082022_JTP_StaraZagora_BGf.pdf](#)

For further information on the TJTP assessment tool

Imke Luebbeke

Head of Climate and Energy, WWF European Policy Office

Contact

Katie Treadwell

Energy Policy Officer, Climate and Energy team, WWF European Policy Office

ktreadwell@wwf.eu

Romain Laugier

Climate Officer, Climate and Energy team, WWF European Policy Office

rlaugier@wwf.eu

WWF does not claim responsibility or endorse any assessment produced by this tool unless verified.

WWF European Policy Office, 123 rue du Commerce, 1000 Brussels, Belgium.