



Assessment for Bulgaria (Kyustendil)

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



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



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



Recognises the value of SMEs and start-ups, setting out a clear plan for their support and incentivisation e.g. through dedicated incubators

✔ Includes programme specific indicators (section 2.5) to measure support to, or success in supporting, SMEs and start-ups.

Comments: SMEs are included in specific measures, only in relation to the renewable energy project/action.



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 TJTP mentions the NECP and the need for the NECP to be revised (as Bulgarian NECP has especially low ambition).



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



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 targeted investments sufficient to remedy these gaps and create decent, sustainable and resilient jobs for all current (and future) workers in the region

Comments: focuses on jobs RCR 01 indicator - 1050 jobs created

- Does not consider the quality of new jobs or include measures to address the issue
- 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
Comments: The plan focuses mostly on inequalities among the workers involved in the coal sector, but does not focus on general population inequality, energy poverty etc, and does not include such indicators.
- 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: The plans focuses on rehabilitation and contains indicator on rehabilitated and "greened" areas RCR 52, but falls short of analysing the problem of air, water and soil pollution or proposing nature-based solutions for the region.
- fails to recognise the importance of supporting gender equality in the just transition plan



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: There is a biomethane investment activity, without specific mention that the source should be only agricultural waste.



Foresees no investments in infrastructure which could directly or indirectly lead to greater greenhouse gas emissions

Comments: No explicit fossil fuel investments. Hydrogen and biogas investment do not include major new pipelines, but implementation must be monitored.



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

✔ Includes programme specific indicators (section 2.5) to measure biodiversity or environmental quality

Comments: RCR 52 indicator for rehabilitated areas included, but no dedicated nature-based solutions.



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.

Comments: Not many specifics on circular economy



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: It is not clear that the mining and power generation facilities can cover all recultivation and cleanup costs, solely using their own dedicated funds.



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 complementarities identified.



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: No private funding sources leveraged



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: Not many details about the function of the regional coordination unit.



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



Limited detail on how stakeholder views and consultation inputs were integrated into the final plan, or how they will be (beyond a commitment to a consultation, for example). Detail on stakeholder engagement plans for the preparation, implementation, monitoring and evaluation of the TJTP is also limited.

✓ 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

Comments: No public consultation on final draft yet.



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.



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: Community and youth engagement needs are noted, but no specifics on how this will be accomplished, with the exception of a handful of youth seminars.



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: More aspects of the just transition, such as energy poverty, could be covered, also using more indicators, including qualitative.



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

Attachment: [02082022_JTP_Kyustendil_BG_f1.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.