



# Assessment for France (Hauts de France (Nord et Pas de Calais))

Status: Final Plan

Date of plan: 03.10.2022



## 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

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## 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

Comments: France's target set by the national low carbon strategy (SNBC) is -40% GHGs by 2030.



Identifies the opportunities to increase renewable energy in the region or nationally, but no specific actions, projects or targets are proposed

Comments: Focuses almost solely on employment, although the wider operational programme covers more (including a specific objective to promote renewable energy with specific targets, such as urban heating networks). The wider operational programme also indicates that up to 15 million euros will be set aside for investments in biomass and solar energy. Section 1 indicates that targeted projects are linked to new industrial energy systems, in particular through support for the production and storage of renewable energies and energy networks, among others.



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

Comments: Specific actions/projects are lacking, although it does indicate energy efficiency will be an important area of investment : It highlights that only 1/3 of emissions in cement come from energy use. 54% reduction in GHG possible with RES and energy efficiency; but aiming for 85% reduction by 2050 versus 2015 - the TJTP points to the need to refocus the production of concrete "on circular economy loops." In section 2.3 it notes, ""The exploitation of "urban mines" must be consolidated, and the incoming flow must be extended to other end-of-life products or industrial waste in order to increase the profitability of the recycling plants."

As for renewable energy, however, the wider ERDF programme does target energy efficiency in a broader sense.

Some areas of intervention include energy efficiency areas.

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## 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 complete phase-out of coal is planned or implied in the territory by 2030



A phase out of fossil gas infrastructure phase-out is planned or implied, but the date is after 2035 or is undefined

Comments: The end fo fossil fuels is acknowledged, including the need to replace fossil fuels also in the chemicals sector (linked to a proposed use of the bioeconomy)



Not enough information available or fossil fuel subsidies not discussed

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## Principle 3

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



Promotes economic diversification, and explicitly recognises (e.g. in the assessment of the transition challenges) that all sectors of the economy must become sustainable

Comments: However, this is dependent on the interpretation of the Taxonomy-linked DNSH.



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

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

Comments: Section 2.5/4 is not sufficiently elaborated, but the wider operational programme includes indicators about enterprises of different size classifications assisted. Several areas of intervention target SMEs (digitalisation, research and innovation, process innovation).

- 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

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## ● 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: But emphasis is heavily weighted towards existing workers and those who have lost their jobs from the targeted transforming industrial or declining sectors.

- 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

- 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 TJTP does not really consider specific social protection and inclusion measures to address existing inequalities, except for the mining basin subterritory, where it points to persistently lower educational attainment and structural unemployment. In this region:

- 59% of population in this area has lower than baccalaureate education and 26.5% have no diploma. Only 19% have a degree (10% less than the national level). 19.5% unemployment rate is 10.1% higher than the wider region and 11.7% higher than the national level with 50% of households below the poverty line.

Projects here will include those that boost skill recognition and transferability.

- Does not consider the impact of the transition on quality of life or makes only passive mention to some issues, such as air quality improvements

Comments: Only in one area of intervention will some individuals be accompanied to access healthcare and accommodation etc. to help them get back into employment.

- makes reference to the importance of supporting gender equality but does not propose any dedicated activities or priorities to achieve this

Comments: This is very much mentioned in passing. As 70% of the workers expected to be impacted are male and the plan focuses on those workers directly impacted, the attention to existing gender inequality is lacking.

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## ● 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

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

- Does not foresee activities which would improve any biodiversity or environmental indicators relating to any of following categories:
  - Biodiversity
  - Air pollution
  - Accessible greenspace (land take)
  - Water quality

- 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: This is strongly reflected in the plan.

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## ● Principle 6

The TJTP should respect the polluter pays principle.

- The TJTP does not identify the entities responsible for existing environmental damage.

AND/OR the TJTP recommends to use JTF resources to pay for land restoration without an analysis - or commitment to an analysis - of the possibility and applicability of the Polluter Pays Principle

Comments: No recognition of pollution damage in the region - and its consequences for prosperity and a just transition- is made in the plan.

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## ● 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: It is not fully clear from the plan if other funds will be used from the national level but France 2030 is recognised as complementary to the TJTP: it is not clear however if these will directly help to deliver the TJTP.

- Private funding sources are identified alongside public funding sources, with an indication of how private funds may be leveraged, mainly or exclusively relying on Pillar II of the Just Transition Mechanism

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## ● 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: The monitoring committee is multifund, as are the 'European Funds Programming Committees (which can give an opinion on the projects presented on the agenda for both regional programs and the national ESF + program etc.); there is no dedicated just transition fund monitoring.

- Clearly and comprehensively identifies stakeholders, including key groups as identified in the European Code of Conduct on Partnership, but includes no indication of or justification for their roles and status in the process

Comments: In thw wider operational programme.

- 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.

Comments: A consultation schedule is included, but only 40 unique page views for the TJTP were received and no comments were made on the plans - indicating perhaps a lack of proactive promotion, engagement or capacity building of stakeholders.

- Public consultation and engagement of all stakeholders while all options are open is provided for, but the period of consultation and engagement is launched with less than 4 weeks prior notice

AND/OR

The period for consultation and engagement lasts for less than 12 weeks

AND/OR

There is less than 4 weeks to comment on the final draft

AND/OR

Not all relevant stakeholders have been given the opportunity to participate in a public consultation.

Comments: The consultation in April 2021 lasted 21 days (April 1st-April 21st).

It should be commended that the region held workshops and working groups to identify the needs before drafting the first operational programme (before the announcement of the JTF) in 2019-2020.

- Social dialogue is not a part of the planning process, or is mentioned only passively. Labour unions and social partners have not been engaged in social dialogue during the development of the TJTP.

Comments: Unions have, however, been involved in the development of sectoral National Industry Council (CNI) roadmaps and are listed as having been involved in the development of the operational programme.

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## ● 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: The public consultation did include information about an information session held in order to provide an opportunity for responses to citizen questions.

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## ● 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: Indicators are limited in the wider operational programme for the just transition region, are quantitative only and are not elaborated in the TJTP. Some indicators in the wider operational programme and relevant to the whole region are relevant to the just transition, but not targeted.

- 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: A regular evaluation is foreseen.

## Comments

The plan is heavily focused on the transformation and skilling needs for the industries in the transition region. While the plan should

be read in the context of the operational programme for the wider Hauts de France region, it is observable that the plan does not appear to attempt to address existing inequalities. It focuses on transforming industrial processes rather than the region and its economy, risking embedding the status quo.

Only for the mining basin subterritory does it consider structural inequality/unemployment, but inequalities and social progress beyond employment/education do not appear well-captured.

**For further information on the TJTP assessment tool**

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