



Assessment for Slovenia (SASA - Deloitte Action Plan only)

Status: Draft Plan

Date of plan: 03.05.2021



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

✔ The plan will be revised to take into account the updated EU 2030 target

Comments: This is just the action plan. Alignment with the Slovenian NECP is indicated as necessary.



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



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



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

Comments: Relies on the Slovenian national phase out plan (unadopted) with a 2033 phase out date. However, no clear phase out dates for the mine and plant are referenced.



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

Comments: Included in the potential operations under the TJTP for contribution from the JTF is a green hydrogen plant using biomass. While it should be "linked to new sustainability criteria which are expected to be further defined with the recast of RES Directive", it doesn't indicate how efficient and sustainable use of hydrogen will be incentivised. "The green hydrogen produced within the pilot project could be consumed at the existing gas units, reconfigured for green hydrogen gas use, within the mobility sector through a suitable charging station for trucks and buses and for the purpose of the district heating system." This should be improved and clarified: hydrogen will not be sufficient for use in existing gas units for electricity generation, or for day-to-day residential heating.



Not enough information available or fossil fuel subsidies not discussed



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: Some indications of a recognition new industries should be sustainable, but no clear mechanism is suggested to ensure it.

E.g. suggested operation 8 includes good guidance: "Productive greenfield and brownfield investments with a direct impact on the diversification of the local economy... Investments will have to pursue energy-efficient and circular economy principles through all stages of project development..."



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

✘ TJTP plans to provide excessive or unjustified support to large enterprises, particularly from the Just Transition Fund

Comments: Attracting new (and supporting existing) large enterprises is favoured on the grounds that the region lacks 'an entrepreneurial mindset'. This reasoning is not clearly justified. 70% of the region's revenues are currently generated by three of the biggest companies alone, which may undermine resilience and far less than 50% of employees are employed by SMEs.

- 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

● 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: Most suggested operations target directly affected workers, but some consideration is given to educational opportunities with schools etc.
- Identifies the existing and future skills, training and education gaps for all workers and sectors, including future generations, at regional level on the basis of objective and quality skills forecasts or clearly sets out a process to identify them
- 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: Specific actions are proposed that target existing and former coal sector employees, whereas actions targeting other groups tend to be non-specific or lack detail.
- Does not consider the quality of new jobs or include measures to address the issue
- Does not consider social protection and inclusion measures, even if inequalities are recognised
Comments: Strategic objective 5 outlines a sub-objective to "Caring for vulnerable groups and reducing social inequalities related to the challenges of coal mining (support for the disabled and injured in mining accidents, support for retired miners in maintaining social inclusion, support for migrant workers in mining, etc.)." But the action plan notes that no specific proposed operations to address this are included, except for one suggested operation involving energy communities which could also reduce energy poverty, but is not clear if this would be sufficient to address risks.
- 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: Quality of life needs to be more proactively addressed.
- 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 qualityAND 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: This should be verified against the proposed measures in the final plan. Of concern is the reliance on biomass which may or may not be sustainable or imply landtake.
- Foresees no investments in infrastructure which could directly or indirectly lead to greater greenhouse gas emissions

- 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: Biodiversity projects and projects to improve greenspace access are notably missing, although could be included under 'revitalisation' projects

- 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 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: Significant investment in revitalisation and rehabilitating former mining sites is foreseen, without any indication of an assessment of former operator's ability to pay for damage caused by their activities. Support to the large incumbent coal sector companies to restructure may also come from the JTF and this should be evaluated against the polluter pays principle.

● 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 clear which other funding sources will be used and what the criteria will be for setting this, but some of the long-listed projects include an indication.

- 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

Comments: Only for some longlisted projects and it is not clear how these will be leveraged. The longlisted projects included a criterion determining their rating (RCR 02) based on the "Leverage effect measured as total project value divided by predicted JTF contribution."

● 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. Requirements for membership of the coordination body and composition of the membership body are clearly presented. Detailed information on meeting timing and regularity is provided, as well as detailed information on how, when and where relevant documents and information on process will be published in an accessible place, ideally including online tools.

- 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

- 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: There is limited detail on how effective participation will be continued and whether attention has been given to the need to upskill, or build the capacity, of some stakeholders to participate.
- 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: Consultations and open calls for projects ideas were held, but usually with less than 4 weeks to input, often falling over holiday periods (Easter/Christmas and New Year).
- 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: Explicit and dedicated tripartite social dialogue with unions and workers is not clearly indicated.



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
- Takes into account the need for community engagement, indicates how existing and planned community initiatives may be integrated into the TJTP and makes clear provision to engage and inform the local community

Comments: Just Transition Centre (operation 16) includes provision to inform the local community about the just transition and to support the development and implementation of projects. An online consultation also allowed the community to submit projects Portal Energetika)



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: Limited data on inequalities is available in the plan.
- 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: "...The monitoring function shall also observe the overall process of coal phase out in line with the National Strategy. Should the overall transition process deviate from the predicted trajectory, thus endangering the key enabling conditions for a successful transition, the coordination body will and react accordingly (i.e., trigger the need to revise the Plans)."

For further information on the TJTP assessment tool

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