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Assessing the link between climate governance and citizens in Romania:

socio-economic impact and public participation

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Report Title

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A study by

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About EPG

EPG is an independent think-tank specialising in energy and climate policy, focusing on the decarbonisation of the Romanian and Central and Southeastern European economies. Founded in 2014, EPG operates as a research institute primarily financed through competitive research grants. Its research aims to promote a constructive, evidence-based dialogue on decarbonisation and economic transformation among decision-makers and the public, both regionally and globally.

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Key findings

Romania falls short of properly engaging citizens in climate-related policymaking and to adequately measure and address the socio-economic impact of the transition. Energy poverty and the just transition have so far not been treated in a comprehensive and constructive manner in the country's key energy and climate strategies. Insufficient engagement and public participation coupled with the lack of clear and actionable mitigation measures for the socio-economic impact of climate policy raises the serious risk of growing greenlash and public opposition. The gaps identified in this report should be addressed through (1) increased transparency and structured dialogues with citizens and organisations, (2) a rapid and pragmatic approach to reducing energy poverty, and (3) a better integration of just transition measures into the wider energy and climate policies at national level.

Executive Summary

The transition towards climate neutrality that the European Union is undergoing may face challenges concerning the social acceptance of decarbonisation policies, due to a lack of effective public engagement and insufficient consideration given to the socio-economic impact of the transition. As climate policies evolve and start becoming more encompassing, potential regressive effects could directly impact consumers and households, especially those most vulnerable.

Tackling energy poverty and pursuing a just transition are among the most relevant methods for addressing the socio-economic impact. However, this report highlights the limitation of the current approach to dealing with energy poverty and just transition. Romania's efforts to mitigate energy poverty and ensure a just transition lack key governance features and leave substantial implementation gaps. Financing mechanisms, institutional responsibilities or targets and clear timelines for implementing policies and measures are sparse or not mentioned at all in Romania's main strategic climate planning documents, the National Energy and Climate Plan and Long-Term Strategy, or the draft Romanian Energy Strategy 2022-2030, with a 2050 perspective.

This is particularly evident for the current approach to dealing with energy poverty and just transition. Energy poverty has long been treated as an isolated phenomenon, being insufficiently integrated in broader strategic documents. While there is some variation among strategies, none manages to address the issue in a compelling manner and the planned interventions are largely inadequate.

The contribution of national strategies to ensuring a fair transition is similarly uncompelling. The national framework for just transition lacks a definition for it and the concept is oftentimes coupled with measures to tackle energy poverty or addressing the coal phaseout, leaving other carbon intensive areas unaddressed. While the significant focus given to education and green jobs is important, Romanian strategies fall short on other just transition topics such as economic diversification, gender-based effects and policies, redevelopment of the affected areas.

The engagement and implication of the public in the design of Romanian climate policy have also proven insufficient, as it seems likely that not even the requirements for public participation of the Governance Regulation have been properly implemented. The analysis and survey that EPG conducted for this report highlight the lack of transparency and the informational gaps in the process of drafting climate policy, as authorities showed deficiencies in communicating with the public.

To **anticipate and cushion** an upcoming **greenlash against climate policies** that can emerge as a result of the current policymaking shortcomings, the current planning process should consider the following recommendations.

Energy poverty:

- Integrate energy poverty as a cross-cutting topic across legislation in order to have a comprehensive and coherent framework.
- Define targets for energy poverty, clear up institutional responsibilities and set up a data collection and monitoring system.
- Develop and implement an integrated energy poverty action plan which should include clear and targeted social assistance measures, going beyond financial handouts and focuses on addressing the systemic causes of poverty.
- Establish an energy poverty action group at the government level to integrate and coordinate the governance efforts.
- Set-up one-stop-shops at the local level.

Just transition:

- Offer a just transition definition and set objectives in national climate strategies.
- Provide a plan or framework for economic and educational transformation, by offering targeted financial support and tailoring the plan to the local particularities.
- Address other social consequences of the transition, such as the impact on women, loss of cultural identity and address the risk of school dropout for children in just transition regions.

Public participation:

- Set clear and detailed procedures for public participation.
- Ensure early engagement, at the incipient stages of drafting documents and define in legislation what is considered as reasonable timeframes for consultations.
- Enhance transparency and access to information by making information publicly available through different channels in the early stages of the consultation process.
- Enable different formats and create avenues for public participation to foster more input from stakeholders/citizens.
- Enshrine in legislation a permanent stakeholder engagement platform on climate policy with representatives of industries, unions, NGOs, academia, research institutes, and local authorities.
- Ensure that the input of the public and stakeholders is effectively incorporated in the final documents and facilitate feedback loops.
- Allocate additional resources (both human and financial) to the implementation of the public participation process.

Sumar executiv

Tranziția către neutralitate climatică a Uniunii Europene s-ar putea confrunta cu provocări în ceea ce privește acceptarea socială a politicilor de decarbonizare, din cauza lipsei consultării publicului în mod eficient și atenției insuficiente asupra impactului socioeconomic al tranziției. Pe măsură ce politicile climatice evoluează și încep să devină mai cuprinzătoare, potențiale efecte regresive ar putea afecta în mod direct consumatorii și gospodăriile, în special cele mai vulnerabile.

Combaterea sărăciei energetice și asigurarea unei tranziții juste sunt printre cele mai relevante metode de abordare a impactului socioeconomic. Cu toate acestea, prezentul raport evidențiază limitările abordării actuale a sărăciei energetice și a tranziției juste. Eforturile României de a atenua sărăcia energetică și de a asigura o tranziție justă sunt lipsite de elemente cheie ale unei bune guvernanțe și lasă lacune substanțiale de punere în aplicare. Mecanismele de finanțare, responsabilitățile sau obiectivele instituționale și termenele clare pentru punerea în aplicare a politicilor și măsurilor sunt sporadice sau nu sunt menționate deloc în principalele documente strategice de planificare climatică ale României, Planul Național Integrat pentru Energie și Climă și Strategia pe Termen Lung, sau în proiectul de Strategie Energetică a României 2022-2030, cu perspectiva anului 2050 (care a fost relevant pentru analiza sărăciei energetice).

Sărăcia energetică a fost mult timp tratată ca un fenomen izolat, fiind insuficient integrată în documente strategice mai ample. Deși există unele variații între strategii, niciuna nu reușește să abordeze problema într-un mod convingător, iar intervențiile planificate sunt în mare parte inadecvate. Contribuția strategiilor naționale la asigurarea unei tranziții juste este la fel de puțin convingătoare. Cadrului național pentru o tranziție justă îi lipsește o definiție a fenomenului, iar conceptul este adesea asociat cu măsuri de combatere a sărăciei energetice sau de promovare a eliminării treptate a cărbunelui, lăsând neabordate alte regiuni cu emisii ridicate de carbon. În timp ce accentul semnificativ pus pe educație și locuri de muncă verzi este important, strategiile românești sunt deficitare în ceea ce privește alte subiecte legate de tranziția justă, cum ar fi diversificarea economică, efectele și politicile de gen, sau redezvoltarea zonelor afectate.

Implicarea publicului în elaborarea planurilor s-a dovedit, de asemenea, insuficientă, deoarece pare că nici măcar cerințele privind participarea publicului din Regulamentul privind Guvernanța Ununii Energetice nu au fost puse în aplicare în mod corespunzător. Analiza și sondajul realizate de EPG pentru acest raport evidențiază lipsa de transparență și lacunele informaționale din procesul de elaborare a politicilor climatice, autoritățile manifestând lipsă de comunicare cu publicul.

Pentru a **anticipa și a atenua** o viitoare **opoziție a publicului la politicile climatice** care poate apărea ca urmare a deficiențelor actuale de elaborare a politicilor, procesul actual de planificare ar trebui să ia în considerare următoarele recomandări.

Sărăcia energetică:

- Integrarea sărăciei energetice ca temă transversală în legislație pentru a avea un cadru cuprinzător și coerent.
- Definirea obiectivelor privind sărăcia energetică, clarificarea responsabilităților instituționale și instituirea unui sistem de colectare și monitorizare a datelor.
- Elaborarea și punerea în aplicare a unui plan de acțiune integrat privind sărăcia energetică, cu măsuri clare și specifice de asistență socială, care să depășească simplele compensații financiare directe și să se concentreze pe abordarea cauzelor sistemice ale sărăciei.
- Înființarea unui grup de acțiune privind sărăcia energetică la nivel guvernamental pentru a integra și coordona eforturile de guvernare.
- Înființarea de ghișee unice la nivel local.

Tranziția Justă:

- Să ofere o definiție a tranziției juste și să stabilească obiective în cadrul strategiilor naționale privind clima.
- Oferirea unui plan sau a unui cadru pentru transformarea economică și educațională, prin oferirea unui sprijin financiar specific și prin adaptarea planului la particularitățile locale.
- Abordarea altor consecințe sociale ale tranziției, cum ar fi impactul tranziției asupra femeilor, pierderea identității culturale sau abordarea riscului de abandon școlar pentru copiii din regiunile de tranziție.

Participarea publicului:

- Stabilirea unor proceduri clare și detaliate pentru participarea publicului.
- Asigurarea unei implicări timpurii, în stadiile incipiente ale elaborării documentelor, și definirea în legislație a termenelor considerate rezonabile pentru consultări.
- Sporirea transparenței și a accesului la informații prin punerea la dispoziția publicului a informațiilor prin diferite canale în etapele inițiale ale procesului de consultare.
- Diversificarea formelor de participare publică și creearea de căi de participare publică pentru a încuraja mai multe contribuții din partea părților interesate/ cetățenilor.
- Stabilirea în legislație a unei platforme permanente de implicare a părților interesate în politicile privind clima, cu reprezentanți ai industriei, sindicatelor, ONG-urilor, mediului academic, institutelor de cercetare și autorităților locale.
- Încorporarea eficace a contribuțiilor publicului și ale părților interesate în documentele finale.
- Alocarea de resurse suplimentare (atât umane, cât și financiare) pentru punerea în aplicare a procesului de participare a publicului.

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List of Acronyms

EC	European Commission
EPAH	Energy Poverty Advisory Hub
EPG	Energy Policy Group
ETS	European Trading System
EU	European Union
EU-SILC	EU statistics on income and living conditions
GHG	Greenhouse Gas Emissions
JT	Just Transition
JTM	Just Transition Mechanism
LIHC	The Low-Income High-Cost indicator
LTS	Long Term Strategy
MS	Member States
NECP	National Energy and Climate Plan
M/2	The underconsumption indicator
TJTP	Territorial Just Transition Plan
10%	The 10% indicator
2M	Below half the national median indicator

1. Introduction

The European Union (EU) set itself on an ambitious pathway towards climate neutrality by 2050. The transition to a low carbon economy entails deep structural changes that society will need to face and adapt to. The transformational process of switching from a fossil fuel-based economy to a green and sustainable one requires a high level of social acceptance and public legitimacy. In this sense, understanding the socio-economic impact of the transition is key to securing a just and fair transition towards net zero. Mitigating the potential regressive impact of climate policy and ensuring a whole-of-society approach, where citizens are on-board, are essential elements for the transition. To foster social acceptance, citizens need to be informed and avenues for effective public participation need to be ensured at the Member State (MS) level.

The consequences of not comprehensively addressing the socio-economic impact of the transition could spark public resistance, slowing down the pace of the transition. Public opposition towards climate mitigation policy has been coined as 'greenlash' and there have been several examples in Europe over the past years: the 'yellow vests' protests in France over the carbon tax, the protests in Germany over the switch from oil and gas boilers to low-carbon alternatives such as heat pumps, protests over the ban of new sells of cars with internal combustion engines, scheduled to happen in 2035 (CER, 2023).

Shortcomings in addressing the socio-economic impact and insufficient engagement could mean that climate policy implementation may suffer delays, which translates into higher costs over time. The Commission estimated that the cost of inaction on climate mitigation could rise to EUR 2.4 trillion in the 2031-2050 period in the EU (EC, 2024a). Moreover, the EU Emissions Trading System (ETS), now extended to the buildings and road transport sectors, will have direct impact on citizens, with the cost of purchasing and trading allowances by the fossil fuel suppliers leading to increases in the consumers' bills.

At EU level, the importance of mitigating the socio-economic impact of the transition to a low carbon economy has materialised in several policy initiatives, such as the Just Transition Mechanism, where the most carbon-intensive territories receive targeted support, and the Social Climate Fund, a designated fund to mitigate the impact of the ETS2[1] on lower-income households. Addressing energy poverty also has an important place in the EU climate policy, as the need to address it has been reiterated through numerous documents.[2]

[1] The ETS2 is a new emissions trading system which aims to incentivise decarbonisation in the following sectors: buildings, road transport and small industry not covered in the EU ETS (EC, 2023b). As the fuel suppliers will be the market actors in the ETS2 scheme, it is foreseen that consumers will face a direct and visible impact. The regressive effects will be shouldered especially by lower income households, which will have difficulties to switching to low carbon initiatives as they usually spend more of their income on housing related energy expenditure (EPG, 2022b).

[2] Energy poverty has been on the European agenda since 2009, when the Third Energy Package was adopted. Since then, the policy interventions have evolved and a first ever unified energy poverty definition was adopted in 2018, as part of the revisions of the Energy Efficiency Directive and the Energy Performance of Buildings Directive (EU, 2018a).

When it comes to public engagement, the Regulation on the Governance of the Energy Union and Climate Action (Regulation (EU) 2018/1999) imposes clear legal obligations to MS to ensure early and effective public participation in the elaboration of strategic climate plans, the Long-Term Strategy (LTS) and the National Energy and Climate Plan (NECP). In the elaboration of the Long-Term Strategy, MS are required to dedicate a whole chapter of the strategy to the impact assessment of the socio-economic aspects. The NECP should also present policies and measures to mitigate energy poverty and just transition (EU, 2018b; EC, 2022).

The two plans have a crucial role in the climate governance system of each MS, as they are the first economy-wide planning tools developed at the EU level. The plans follow roughly the same structure dictated by the Governance Regulation and converge into a unified effort to address the most pressing issues of the transition. The common elements of each national plan and long-term strategy, such as target setting, policies and measures to achieve them formulate an integrated vision for both short and long term to mitigate climate change. Their main role is to enhance visibility and predictability for a country's decarbonisation pathway.

Despite such EU requirements, action at national level remains lacklustre, as it is often treated as a mere formality necessary to comply with the legal requirements. This shortcoming was highlighted in the European Commission's EU-wide assessment of draft updated NECP, showing that measures to mitigate the socio-economic impact were insufficiently addressed (EC, 2023c). The assessment also revealed that most NECP drafts do not include the summary of the public's views, how they were considered or concrete evidence on whether the regional and local authorities were engaged. There was no concluding evidence on whether the public was informed on the process. Only Lithuania was singled out as a good practice example by the Commission.

Romania is one of the countries which failed to address public participation requirements in the NECP revision and the LTS elaboration. Its climate policy landscape is mainly dominated by short-sighted decarbonisation policies which insufficiently address the impact on the people and communities. A striking example is the coal phaseout law, which in its initial versions stipulated clear just transition measures for the affected workers. In its adopted version, the measures were eliminated (EPG, 2022a).

This report aims to show how this divide between policymakers and the citizens can be bridged in Romania by effective public participation and targeted policies to address the socio-economic impact of the transition, specifically referring to energy poverty and just transition aspects. The first part of the report is a mirrored assessment of energy poverty and just transition. Firstly, it analyses how energy poverty was addressed in the draft updated NECP (Romania NECP, 2023) , the LTS (Ministry of Environment, Waters and Forests, 2023) and the draft Romanian Energy Strategy 2022-2030 (Ministry of Energy, 2022), based on a 6 items methodology: 1) definition; 2) indicators; 3) interventions; 4) governance measures; 5) resource allocation; 6) processes and procedures. Then, it analyses how just transition was treated in the draft updated NECP and LTS based on a simplified, 4 items methodology: 1) definition; 2) governance measures; 3) resource allocation; 4) processes and procedures. The second part of the report assesses public participation, based on a survey conducted in September 2023. Based on the assessments and the good practices presented, the report makes recommendations on how energy poverty and just transition should be treated in the

strategic climate governance planning and provides guidelines on how an effective public participation process should be enabled.

2. Managing the socio-economic impact

This section addresses the socio-economic impact of the transition, focusing on two specific issues covered in the NECP and LTS[3]: energy poverty and just transition. The analysis of energy poverty also covered the draft Romanian Energy Strategy 2022-2030. For energy poverty, the strategic documents are analysed using a methodology constructed around the following items: 1) definition; 2) indicators; 3) interventions; 4) governance measures; 5) resource allocation; 6) processes and procedures. For just transition, a simplified version of this methodology was used, with only 4 items, as this concept is less comprehensively addressed in the Romanian legislation. The full breakdown of the methodology along with the scoring scheme can be consulted in the Annex.

The chapter is a mirrored analysis of energy poverty and just transition according to the following structure: the first subsection presents the regulatory framework at the EU and national level, the second one, the methodology applied for the analysis of the strategic planning documents, the third one discusses the most important findings and their implications, the fourth one introduces examples of good practices while the final one concludes with the key findings of each section.

2.1. Energy poverty analysis

2.1.1. Status quo of the regulatory framework on energy poverty

In the context of the COVID-19 pandemic and the ensuing energy crisis aggravated by the war in Ukraine, the EU reaffirmed its commitment to a just energy transition. Although not a direct consequence of the transition, energy poverty can strongly be exacerbated by climate policies, which can deepen existing social problems.[4] As a result, its root cause should be properly addressed as per Commission recommendations on energy poverty, which proposes a wide array of measures (EC, 2020).

As it has been identified by the European Commission, energy poverty occurs when a household must reduce its energy consumption to a degree that negatively impacts the inhabitants' health and wellbeing. It is mainly driven by 3 underlying root causes:

- a high proportion of household expenditure spent on energy;
- low income;
- low energy performance of buildings and appliances.

Taking EU Commissions' recommendations into consideration, MS must establish their own definitions and metrics for energy poverty and identify vulnerable individuals based on the local context.

[3] The draft updated National Energy and Climate Plan of Romania (NECP), and the Long-Term Strategy for the Reduction of the Green House Gas Emissions (LTS).
[4] For more on this topic, see EPG (2023).

Due to its private nature, as it mainly affects households, and its complexity, energy poverty remains a major challenge in properly identifying the households and individuals affected by this form of poverty. As a result, several documents have been created to establish a well-defined framework for addressing energy poverty.

The European Energy Poverty framework

After a long period of relative neglect, energy poverty has emerged as a central policy issue within the EU. Institutions and organisations at the EU level have made significant efforts to address the vulnerabilities underlying this condition. The importance of energy poverty as a policy priority is highlighted in the new legal provisions within the Clean Energy for all Europeans Package, which strongly focuses on energy efficiency. The need to alleviate energy poverty as a key component of a just and fair transition has also been highlighted by the EC under the Green Deal and the subsequent Renovation Wave. Additionally, the EU has developed new tools to understand, analyse, and respond to energy poverty challenges, although policy action at Member State levels remains uneven and limited, despite the broader impetus from the EU.

This following section presents the European energy poverty as reflected in key European documents. The findings are used to refine the used methodology. Combined with a selection of good practices explored in section 2.1.4, they are conceived as a foundation for the policy recommendations.

- **Third Energy Package (2009)**
    - Establishes a European energy poverty framework with recommendations and voluntary Member State implementation.
    - Directive 2009/72EC: Encourages Member States to develop governance structures, legal definitions, action plans, and measures to tackle energy poverty, and define 'vulnerable customers' (EU, 2009).
- **Clean Energy for All Europeans Package (2018)**
    - Defines energy poverty as the lack of access to essential energy services, with vulnerable groups identified, such as low-income households and those in rural areas. The categories considered to be most vulnerable are the low and medium-income households, people living in social housing and low-performing buildings, the elderly, households located in rural and remote areas, women, the disabled, children, racial or ethnic minorities.
    - Emphasises comprehensive governance structures and the importance of local initiatives like one-stop-shops.
    - Recommends prioritising energy efficiency and integrating social and financial measures to alleviate energy poverty.
    - The directive provides a set of governance models that should be considered in practice. The models are based on broad and inclusive networks of

expertise, in areas such as buildings, social aid, health, etc. which apply the appropriate indicators, inclusion criteria, produce intervention strategies to suit realities on the ground and measure impact (EC, 2018c).

- **Article 3(3)(d) of the 2018 Governance Regulation**
    - Member States must assess the number of households in energy poverty and include these in national energy and climate plans (EU, 2018a).
- **The 2019 revised Electricity Directive**
    - Requires Member States to assess and report energy poverty levels and establish criteria for identifying affected households.
    - Allows public interventions in electricity pricing for vulnerable households, and extends the obligation to report on the number of energy poor households to the Member States that apply such interventions.
    - Mandates protections for vulnerable customers, for instance through adequate safeguards; prohibition of electricity disconnection in critical times; transparency regarding contractual terms and conditions; general information and dispute settlement mechanisms; benefits under social security systems; support for energy efficiency improvements; and other measures addressing energy poverty, including in the broader poverty context.
- **Energy Efficiency Directive (2012, amended 2018, revised 2023)**
    - Provides the first European definition of energy poverty and requires Member States to develop national definitions and intervention frameworks.
    - Requires the Member States to take account of the need to alleviate energy poverty, for instance by requiring a share of national energy efficiency measures or alternative measures and programmes 'to be implemented as a priority among vulnerable households, including those affected by energy poverty'. Information about the outcome of the measures aimed to alleviate energy poverty must be integrated in the national energy and climate progress reports.
    - Includes a new definition of energy poverty and specifies indicators to be considered when assessing the number of people in energy poverty (EC, 2024d).
- **Regulation on the Governance of the Energy Union and Climate Action (2018)**
    - Mandates governments to identify and report households affected by energy poverty, set reduction objectives, and monitor progress.
    - Recommends integrating public policies and good practices (EU, 2018b).

- **Updated Commission Recommendation on Energy Poverty (2023)**
    - Provides comprehensive guidelines for energy poverty intervention and expands the categories of vulnerable households.
    - Recommends establishing energy poverty observatories and advisory networks for close monitoring and policy advice.
    - Adds to the vulnerable categories mentioned above, households rendered vulnerable by the low efficiency of the appliances used, households affected by geographical and climate factors, household characteristics, single mothers, transportation needs and situations of price instability (EC, 2024d).

In conclusion, the European legal framework builds up over time an explicit and coherent set of requirements for the Member States with regards to energy poverty, with an inclusive perspective on the beneficiaries, regarded both as categories affected by layers of vulnerability in the context of energy transition, and as groups that may become vulnerable to market events. The governance model proposed is based on the principle of subsidiarity and integration with the capacity to act as closely and targeted as possible to the problem matter in order to reduce implementation risks. Despite its explicit character, the European framework is void of legal constraints on the implementation of energy poverty targets and is mainly based on the willingness of the Member States to adhere to them and to the circulation of good practices, resulting slow steps forward.

Energy poverty in Romania

Although not as precisely defined as the European framework, Romanian legislation on energy poverty primarily addresses the issue through financial incentives for vulnerable consumers. This analysis aims to evaluate how effectively energy poverty is defined and addressed in Romania. It provides a brief overview of the current legislative framework and offers an in-depth assessment of national strategies aimed at tackling this issue, specifically the draft updated NECP, the LTS and the draft Romanian Energy Strategy 2022-2030.

- **Law 123/2012:** offered the first definition in the Romanian legislation of the vulnerable consumer and anchored the concept in financial precarity, age and health issues which resulted in a series of secondary legislative provision that lay the foundation of a mainly social intervention framework (Official Journal, 2012). Studies have pointed out the high degree of bias and exclusiveness embedded in the definition and the remedies (Sinea & Jiglau, 2021)

- **Law 226/2021:** offers a more comprehensive understanding of the concept by adding new categories of affected groups and new dimensions of energy poverty: households who lack access to energy or are consuming energy inefficiently, people affected by summer energy poverty, and households for which it is difficult to secure minimum levels of energy necessary to perform all household needed tasks (Official Journal, 2021). All in all, the definition offers substantial conceptual grounding and opens important directions for operationalisation. However, in terms of operationalisation,

the legal framework remains within the confines of law 123, as it focuses mainly on social measures without procedural clarity all the other areas mentioned above.

- **Secondary legislation (OUG 70/2011):** prescribes heating aid during the cold season, separately for vulnerable gas, electricity, solid resources and central heating consumers, and heating supplements over the entire year for households in-need. Non-financial measures are applied to a limited extent and mainly target individuals with health situations depending on electricity provision (Official Journal, 2011).

- **Temporary aid programmes:** in addition to these measures provided for in legislation, a set of temporary aid programmes have been adopted: 1) the energy cap and compensation measure is applied between November 2021 - 31 March 2025 (Law 357/13.12.2022) implemented by the Ministry of Labour; 2) energy vouchers have been handed out to certain socially vulnerable categories under the coordination of Ministry of European Investments and Projects (OUG 116/2022 and OUG 101/2023). These measures are typically price-related social measures, which are second degree interventions in accordance with the European perspective.

- **Additional measures:** 1) a government emergency measure aimed at establishing one-stop-shops designed to implement the energy efficiency first principle; 2) the liberalisation of the energy market; 3) simplified and transparent billing and a dispute settlement regime, bill forbearance for vulnerable consumers (Official Journal, 2023b); 4) provisions related to facilitating energy provider switching.

Overall, the legislative framework in Romania is rather limited and does not include energy poverty in the National Strategy on Social Inclusion and Poverty Reduction for 2022-2027 (Ministry of Labour, 2022). Consequently, the current legislation fails to address broader and more complex vulnerabilities such as ethnicity, gender, education, and place of residence, which contribute to the persistence of poverty. Additionally, it does not promote adequate institutional collaboration to effectively tackle this issue. Even though Romania benefits from an open and forward-looking definition of energy poverty, due to incomplete concept operationalisation, it is effectless in practice. There is also lack of coherence across national legislation and strategies when referring to energy poverty and the law provisions. A recognition of this definition across the legal and strategic climate and energy framework would create a higher coherence in legislation and action and would lead to long-term solutions in the area of energy poverty intervention.

2.1.2. Assessing energy poverty in key strategic plans and strategies

Methodology

Considering the overall energy poverty policy framework discussed in the previous section, and the necessity to adequately address energy poverty in national strategies, a methodology

was developed for evaluating three national planning documents: the draft updated NECP, the LTS and the draft Romanian Energy Strategy 2022-2030.[5]

The analytical framework includes 6 items essential for the national energy poverty framework:

1. Definition: the provision for an energy poverty definition, refers to the lexical/conceptual boundaries, causes and effects identified in legislation. The definition, be it explicit or implicit by way of reference to characteristics and criteria, forms the basis for action and measurement (Sinea & Jiglau, 2021). The EU requires the development of national definitions establishing causality affected categories (EU, 2023d)

2. Indicators: energy poverty can be directly measured, indicators can be indirectly calculated by means of an existing set of data, or established based on the enquired perception of households with respect to their personal situation (EC, 2023d). Indicators can vary in terms of complexity, with some governments making use of aggregated formulas to reflect the situation on the ground (France NECP, 2023), or proxy EU-SILC data (Romania NECP, 2023).

3. Interventions: remedies can be targeted, approximated or blanket; direct or indirect; financial, including efficiency measures and measures facilitating access to clean and diversified sources of energy, non-financial (procedural, governance, efficiency or behavioural) (EC, 2023d).

4. Governance: energy poverty governance refers to dedicated or related structures established at national, regional or local level in order to address energy poverty. Irrespective of their institutional formulas, the system of governance is responsible for the effectiveness of policies and may be associated with popular trust, which is another element of policy effectiveness (Grossmann, 2021).

5. Resource allocations: the availability of financing referring to dedicated financing programmes, and well-defined allocation principles. At least three types of allocation logics have been identified in practice: precise dedicated budgets or fractions of budgets; percentages of targeted households or dedicated sums, equivalent to the size of affected households in the general population; or a temporisation of multi-annual energy poverty budgets needed to complete eradication (100% broken down in number of years). In addition, various financial instruments are considered in this analysis: private-sector and public-private sector initiatives, loan plans, various grant and investment models, etc.

6. Processes and procedures: frequency and finality of measurement are important functional regime elements with examples in practice of countries that attempt a gradual reduction of energy poverty over a constant measurement of impact in population (Greece NECP, 2023)

[5] This methodology is based on three key pillars: a) the European legal framework and policy instruments: aligning with European requirements; b) Policy-Cycle Theory: utilising the theory by Nachmias and Felbinger (1982) which highlights specific policy components developed in stages. c) literature on energy poverty and policymaking: incorporating insights from Bouzarovski, Petrova & Sarlamanov (2012) Bouzarovski, Thomson, & Cornelis (2021) and Bessa & Gouveia (2022) .

We have contextualized each item and developed 4 scales that reflect various nuances:

0	the absence of the category under reference
1	general reference to the concept, no specific categorisation, and a high degree of exclusion
2	reference to the concept with some categorisation
3	Reference to the concept with precise or open categorisation and implementation sequencing

Nuances, namely if some of the above criteria are not clear-cut, but have some unclearly stated additional or missing elements, are marked with 'a plus (+)' for 'general tendency with some additional elements' and 'with a minus (-)' for 'general tendency with some missing elements'.

The analysis consists of a final, overall assessment of the policy based on the average of the six items' scores. This final score will describe one of the following situations:

0	No overall concern for the topic.
1	Marginal concern for the topic, with some alignment to the EU framework but no immediate reform intentions.
2	Ongoing implementation of the European energy poverty framework.
3	Active implementation and innovation in line with the EU acquis Communautaire on energy poverty.

More details on the methodology and the selected scoring for each category can be found in the Annex.

Assessment of the draft updated National Energy and Climate Plan of Romania

Definition: 1 out of 6. References energy poverty and vulnerable consumers, with categorisation implicit in existing legislation. The plan identifies price volatility as a cause but lacks conceptual openness for future challenges.

Indicators: 2 out of 3. Implicitly refers to criteria like household income and health status. Explicit mention of EU-SILC indicators but lacks clarity and targeting potential.

Interventions: 2+ out of 3. Aims to reduce energy poverty and protect vulnerable populations. Evaluates past measures and proposes an informatics system for efficiency but lacks detailed targeting and evaluation.

Governance: 0+ out of 6. Describes current responsibilities and proposes cooperation between ministries but lacks clarity and detail in governance improvement.

Resource allocations: 0 out of 3. No specific allocations mentioned.

Processes and procedures: 0 out of 6. Describes a stable system with no significant improvements or detailed objectives.

As it is, the document reaches an overall score of 0,83+, which reveals a very marginal concern for the topic of energy poverty. The document makes reference to energy poverty, but the perspective is rather limited, with no specific categories mentioned towards targeting. The indicative objective on reduction of energy poverty remains general with no country-specific indicators and no forward-looking interventions. The document is rather reproductive of the status quo than visionary and reflective of possible ways forward. The perspective on governance or resource allocation are completely absent.[6]

Assessment of the National Long-Term Strategy for the Reduction of Green House Gas Emissions

Definition: 0 out of 6. Mentions energy poverty once, with no definition or reference to national strategies. Highlights the need for an equitable transition but does not associate energy poverty with relevant strategy aspects.

Indicators: 0 out of 3. No indicators mentioned.

Interventions: 0 out of 3. No specific intervention measures related to energy poverty.

Governance: 0 out of 6. No system improvements or designated institutions for addressing energy poverty.

Resource allocations: 0 out of 3. Mentions the Just Transition Fund but does not focus on energy poverty.

Processes and procedures: 0 out of 6. Identified actions and timeframes are not related to energy poverty

Even though there are limitations regarding how much attention should the LTS give to energy poverty, the evaluation displays that there is no concern for energy poverty within this document. This points out the need more integrative efforts between policies on the topic of energy poverty. A better synergy between policies which aim to reduce energy poverty with emissions reduction strategies can create better policies that address both issues simultaneously, leading to more effective long-term solutions that also address the fact that the transition to clean energy can exacerbate already existing forms of income poverty and social exclusion.

Assessment of the draft Romanian Energy Strategy 2022-2030, with a 2050 perspective

Definition: 2+ out of 6. The strategy acknowledges several categories at higher risk of energy poverty, such as households lacking energy access, low-affordability households, and those affected by social exclusion. It highlights causes like energy inefficiency, low incomes, and high prices, emphasising the need to protect human rights.

[6] The detailed breakdown of the analysis can be found in the Annex.

Indicators: 1 out of 3. References are made to EU-SILC indicators like 'arrears on utility bills' and 'inability to keep home adequately warm,' but other common indicators are missing. These are used for general evaluation rather than specific targeting.

Interventions: 2 out of 3. The strategy includes energy poverty reduction as a strategic objective, focusing on structural, financial, non-financial, and governance measures. However, it lacks clear implementation steps and precise targeting.

Governance: 2 out of 6. There is an implicit mention of relevant institutions, but the statements are general, lacking specific governance improvements.

Resource allocations: 1 out of 3. Mentions funding sources like the Just Transition Fund but lacks prioritisation principles or precise allocations.

Processes and procedures: 2 out of 6. Proposes some governance improvements but mainly relies on existing laws, which are criticised for being exclusionary and burdensome.

The overall evaluation of the document is 1,83-, which, in accordance with the methodology described above, places the document in a category that is indicative of very limited progress in the implementation of the European energy poverty framework in Romania. In terms of improvements, the document needs more explicit reference to the legislated definition for the sake of coherence and a more visionary approach in terms of definition operationalisation, indicators, intervention measures and governance and financial planning.

Although this analysis covers the draft version of the Romanian Energy Strategy 2022-2030, with a 2050 perspective, the new draft, currently in public consultation (Ministry of Energy, 2024a) has made some improvements in terms of:

- **governance**: the new draft strategy aims to create an inter-institutional working group within the Ministry of Energy to monitor energy poverty and also plans the development of one-stop shops with expertise in energy poverty in order to assist affected individuals in identifying financial, technical, and administrative-legal solutions.
- **processes and procedures**: the new draft strategy aims to halt the growth of energy poverty over a 10-year period and reduce specific indicators by half compared to 2022. Reference is also made to Law 226/2021, highlighting the need to evaluate the barriers to its implementation and the absence of mechanisms for identifying energy poverty in Romania.
- **Interventions**: the new draft strategy will involve a more targeted approach to assist vulnerable households, moving away from the general applicability of the capping-compensation instrument. Addressing energy poverty will also be prioritized in energy efficiency programmes, as outlined in a specific sub-objective. Lastly, the new draft strategy has made a significant improvement with the representation of individuals affected by energy poverty by further integrated in the decision-making process.

2.1.3. Discussion

The current analysis reveals important concept incoherence among Romania's strategic documents, which only make scant references to the legislation containing the definition, if

any, as in the case of the LTS. Moreover, neither the draft Romanian Energy Strategy 2022-2030, nor the draft updated NECP, mention the exact definition, reflecting with somewhat variation the categories targeted and remedial solutions available. The reforms proposed make proof of discontinuity and an absence of solid national vision in the area of energy poverty. Concept incoherence risks producing high policy inconsistency and increase the chances of entire vulnerable household categories to fall between conceptual fractures, thus calling into question the ability of the authorities to fulfil its obligations in terms of energy poverty reduction.

Secondly, as of now, relevant authorities have not assumed the implementation responsibilities assigned to them, leaving the targeting and remedy system under the framework of Law 123/2012. This law has been criticised for its bias, focus solely on social intervention, and significant inconsistencies (Sinea & Jiglau, 2021). Inclusion criteria on 'isolated households', 'minimum needs' or efficiency standards remain unclarified. To these measures post COVID remedies in the form of caps and compensation or energy vouchers may be added. The LTS does not make reference to energy poverty indicators and does not resolve the question on the impact of climate change or regarding regressive effects of climate policies on vulnerable populations. The documents analysed also display very general resource allocation in the area of energy poverty at most. The LTS and the draft updated NECP lack financial load estimations.

Moreover, despite the existence of a number of interventions, authorities do not rely on the related data for reporting. For some of these components, data is highly difficult to analyse given their lack of coordination. Both the draft National Energy Strategy and the draft updated NECP make reference to some EU-SILC data when evaluating energy poverty on the ground. The immediate conclusion is that measurement and intervention are highly disconnected from one another. This makes monitoring difficult and the design of policies strenuous. Despite having expressed preference for some actions to be taken, there is no attached forward-looking agenda with specific steps, milestones and timelines, in neither of the documents analysed, rendering reforms highly improbable in the near future.

Except for the LTS, the documents reviewed, make either direct or indirect mention to financial and non-financial measures of various kinds. This displays a large embrace of solutions and an adaptive policy disposition, which are assets given the transformative nature of energy poverty, the diversity of its causes and effects, and of its geographical manifestations. However, a hierarchisation of these measures is missing and targeting defective. Currently, intervention is reliant upon a system which is predominantly social aid based, other policies are scarce, unsystematic and unpredictable, which displays long-term unsustainability. Preventive measures are sidelined with a noteworthy omission in the area of GHG reduction. This may expose entire populations to negative externalities emerging from climate issues or climate policies.

Thirdly, the need for governance reforms is evident. Placing intervention responsibilities within the institutions mentioned, namely the Ministries of Energy and Labour, is an impractical solution for at least two reasons: first, due to the lack of institutional capacity, as it generates organisational overload. Signs of inaction have become visible over the years given the decade-long failure to deliver on the legal obligations. Second, it creates policy myopy in an

area where there is need for a diverse set of expertise. The Ministry of Labour will always create social solutions and it should not be expected to put forward remedies in other areas such as energy efficiency, for instance. Maintaining this deadlock situation may result high policy costs, improper targeting, and a long and complicated energy poverty reduction process.

Given all these shortcomings, the next section provides a brief overview of how other EU countries have tackled issued related to the six categories previously mentioned in the methodology section.

2.1.4. Examples of good practice

Most of the EU Member States have some form of recognition of energy poverty in their legislation (Bouzarovski, Thomson, & Cornelis, 2021). In the French legislation, energy poverty is defined in terms of 'a person [...] who experiences particular difficulties in their home in having the energy supply necessary to satisfy their basic needs due to the unsuitability of its resources or habitat conditions' (Law 2010-788, 2010). This definition links energy poverty to climate implications directly and enables possible individual targeting. The same legislation enacts the creation of the National Energy Poverty Observatory (ONPE), to collect and interpret data at all levels of administration and to create the corresponding remedies in the field of housing and mobility.

Denmark, Czechia and Romania are the only countries that make mention of EU-SILC indicators in their NECPs. Most countries develop national indicators in order to reflect the situation on the ground and to build monitoring procedures for policy adjustments and progress (Bouzarovski, Thomson, & Cornelis, 2021). In France, the work of ONPE resulted in the application of very specific indicators. They make use of household budget survey data in order to increase the precision with which vulnerable households are being identified, and policy impact is measured (ONPE, 2014). Indicators are applied generally on the population, but also across pilot projects for obtaining deeper insights. The indicators are used as the basis of a geolocation instrument (GEODIP) used for better local targeting. A similar instrument, EnPoweR, is in progress in the city of Cluj-Napoca, Romania, with the associated proxy glossary (ORSE, 2020). Provided it disposes over the complete set of variables, it should be able to display a multilayered perspective of energy poverty, to allow for multifactorial analysis, and help locate spots of vulnerability. The policy potential of such an instrument cannot be overestimated given its diagnosis, programming and policy design support. The Belgian Energy Poverty Platform measures energy poverty based on three types of indicators: excessive energy spending, hidden energy poverty and subjective energy poverty. These indicators are segmented on socio-demographic criteria (Belgium NECP, 2023)

In terms of interventions, two types of good practices stand out: 1) the integration of energy poverty and energy efficiency objectives in national strategies and 2) the development of 'automatic' systems for financial alleviation.

From the first category of good practices, there have been a number of countries that have assumed efficiency first strategies with clear focus on energy poverty. For example, Greece integrated its Energy Poverty Observatory in an energy efficiency governmental structure for

a better integration of these objectives. Croatia, Estonia and Greece explicitly link up renovation targets and the reduction of energy poverty in their NECPs.

For the second category of good practices, France allocates automatic energy vouchers (Cheque energie), this can be considered as an automatic system for tackling poverty. The vouchers are targeted to low-income families with the aim of increasing their households' purchasing power in relation to their own energy consumption needs. Vouchers cover any type of energy bills, connection fees or some energy efficiency work, and they can be accompanied by other types of social aid. Allocation is performed on the basis of income and family composition and is automatically operated by the tax administration based on income data (Ministry of Economy, 2024).[7]

There are good practices in terms of creating institutional frameworks and plans for energy poverty interventions aimed at facilitating participation, cooperation and exchange of expertise, and decision-making processes that are flexible and close to those affected and planned within predictable timeframes. In 2012, France established by law a National Energy Poverty Observatory, based on partnerships with a diversity of private and public partners (ministries, local administrations, NGOs and market actors with diverse expertise). In 2021, the observatory declared action against energy poverty a national priority. Over four mandates it extended the group of relevant stakeholders and progressively assumed tasks such as indicator development, data collection and analysis, impact measurement, policy design. It issues reports on various aspects related to energy poverty and fosters a broad social dialogue on the issue. More recently individual cities, such as Paris, have expressed their interest in developing their own observatories for a more focused understanding of energy poverty issues locally.

A similar initiative was developed in Greece with the Greek Energy Poverty Observatory (CRES, 2024). The Greek government pursued a cross-cutting perspective on energy poverty by placing the instrument under the authority of the Centre for Renewable Energy and Energy Efficiency. The institute was established with EU digital convergence funding. Local and regional administrations also play an important role in the governance of energy poverty in Greece. This is being displayed through the delegation of direct aid allocation and administrative capacity of energy efficiency programmes to local administration. Local energy cooperatives implemented at the level of public administrations are particularly dynamic in Greece. Bulgaria has also proposed in its draft updated NECP the development of an Energy Poverty Observatory under the Ministry of Energy.

In January 2024, Portugal adopted its Long-Term Energy Poverty Mitigation Strategy 2023-2050 establishing objective for a fair and democratic energy transition with a climate perspective (EPAH, 2024). The Strategy also created a national Energy Poverty Observatory. Energy poverty observatories have also been developed in Italy (Italian Observatory on Energy Poverty , 2024) and more locally in Spain under the regional government of Gipuzkoa.

[7] Allocations can be anywhere between EUR 48 for households with one member and an annual income of EUR 10,800 and EUR 277 for families with an annual income of less than EUR 5,600 and at least two members in composition

One-stop-shops and similar instruments are also increasingly spreading around the EU. They vary in their institutional model and attributions, depending on the local circumstances. For example, the Energy Poverty Advisory Hub of the European Commission (EPAH) offers technical assistance for the establishment of energy-poverty offices at the level of communities and displays success stories. Czechia, for instance, has a more institutionalised and maximalist approach by deploying energy poverty attributions in civic counselling centres, where beneficiaries may access guidance and opportunities for a broad set of social needs.

There are also broader community-based approaches, where energy poverty is part of more encompassing transition model. The Modena Commune in Italy established an energy community based on a local actors' protocol to address energy poverty while developing community energy resilience. The model is more complex as it involves the elaboration of dedicated technical, legal and financial plans. These plans entail an important energy poverty dimension: diagnosis and a concrete 5-year action plan (EPAH, 2023). Similar examples can be found in Spain through the Powerpoor model (POWERPOOR).[8] There are also models of energy poverty-only offices at the local administrations initiative, such as the example of Bucharest's 2nd District one-stop-shop, currently under implementation (EPAH, 2023), the civil society initiatives as is the case of Budapest based RenoHUB (RenoPont), or of various types of private-public partnerships as in the case of Germany (Bouzarovski, et al., 2020).

The importance of the city-level intervention is underlined in the NECPs of multiple Member States: in Belgium, local administrations put in place alleviating (debt assistance) and preventive measures (energy efficiency), whereas the federal level only assumes tariff policies (Belgium NECP, 2023). Austria has programmes for social housing actives at the federal and provincial levels. Croatia mentions a 'capacity-building plan' against energy poverty, that will be implemented in fifteen cities with more than 30,000 residents. Co-operation between stakeholders and policy coherence is particularly emphasised in Slovakia, France, Spain or Lithuania (Bouzarovski, et al., 2020).

Several Member States have made efforts to align their policies with EU criteria and prioritize efficiency investments for energy-poor households. For example, Spain has prioritized energy poverty in its renovation objectives. Croatia, Estonia and Greece explicitly link up renovation targets and the reduction of energy poverty with concrete financial allocations in their Energy Poverty Action Plan (Bouzarovski, et al., 2020)

Greece is one of the Member States with the highest rate of energy poverty, with 23% of households unable to heat their homes properly, as per EU-SILC data. The Greek National Energy and Climate Plan elaborates on the target of reducing the affected population by 50% by 2025 and 75% by 2030 as compared to 2016 levels. To do so, a set of measures are established in the National Energy Poverty Action Plan, which make the object of repeated assessments to optimize for targeting and reduce bias and implementation costs (Greece NECP, 2023). Portugal aims at eliminating energy poverty by 2050 by establishing 10-year

[8] POWERPOOR develops support programmes dedicated to energy poor citizens, encouraging the use of joint energy initiatives and financing schemes (e.g., establishing energy communities/cooperatives, using crowdfunding). POWERPOOR facilitates knowledge sharing to increase the active participation of citizens.

action plans (EC, 2024e). Latvia also displays precise goals of reducing energy poverty under 7,5% by 2030 through renewable targets and an increased level of information on remedies in the population (Powerpoor, 2024).

2.1.5. Key findings

The current analysis reveals that the concept of energy poverty has been presented in a very limited matter, with only very vague references to the concept, particularly in the LTS. Neither the draft National Energy Strategy, nor the draft updated NECP clearly define terms, leading to inconsistencies in targeted categories and proposed solutions. This lack of coherence and consolidated national vision in addressing energy poverty risks creating policy inconsistencies and failing to protect vulnerable households, thereby jeopardizing the government's ability to meet its energy poverty reduction obligations. For long-term sustainability, there must be a shift from social-aid-based interventions to systematic and preventive measures that integrate energy efficiency and climate goals into broader policies. Achieving climate neutrality requires comprehensive strategies addressing socio-economic impacts, ensuring public participation, and implementing effective governance to avoid pushback and socio-economic costs. Lastly, failing to address energy poverty in these strategic documents could have significant consequences, which can include public resistance. This neglect of a large segment of the population's needs may slow the pace of the transition and undermine its overall support and effectiveness.

2.2. Just transition analysis

2.2.1. Status quo of the regulatory framework on just transition

The EU seeks to achieve climate neutrality by 2050 while also providing security of the energy supply and fairly mitigate the regressive effects that some individuals will face in the transition process. It has long been recognised that communities which focus on high emission activities will see negative impacts, as there may be a decrease or elimination of local employment opportunities (OECD, 2017). As part of its plan to alleviate the regressive effects that the communities will face, the EU has put in place large financial mechanisms under the European Green Deal and the Fit for 55 policy packages and a more targeted Just Transition Mechanism to ensure that the shift to a climate-neutral economy proceeds in a fair way, leaving no one behind (EC, 2024a).

The concept of a just transition to clean energy and production methods refers to the process of transitioning away from fossil fuels to cleaner energy sources and feedstocks while considering its aftermath and emphasizing social equity, economic justice, and environmental sustainability throughout the process. It recognizes that the transition can have significant impacts on workers, communities, and economies that are dependent on fossil fuel industries. A just transition approach aims to support individuals from carbon intensive regions through retraining programmes, job creation initiatives, and community development projects to address the regressive impacts. The Paris Agreement has significantly bolstered the recognition and definition of the concept of just transition as it is now intricately tied to equitable labour practices and it emphasises the adoption of low-carbon technologies and a comprehensive decarbonisation process (Lee & Baumgartner, 2022).

The EU Framework for Just Transition

- **The Just Transition Mechanism**: is a key tool for ensuring the equitable transition towards climate neutrality. It offers focused assistance to facilitate the mobilisation of approximately 55 EUR billion between 2021 and 2027 in the regions that have been most affected, in order to mitigate the socio-economic consequences of the transition. It specifically targets regions, industries, and workers that will encounter the most significant difficulties. This is achieved through three key pillars: **a) Just Transition Fund, b) InvestEU Just Transition scheme, c) A new Public Sector Loan Facility** (EC, 2024). Lastly, it is worth mentioning that this mechanism addresses numerous issues related to JT, it does not fully encompass the broader concept. In this report, the JTM is primarily used as a proxy for the more comprehensive concept of JT.
- **The Just Transition Fund:** is one of the key components of the JTM, as it will serve as a crucial instrument to assist the regions that are most impacted by the shift towards climate neutrality by offering them customized assistance. The implementation of this policy is carried out through shared management, within the broader framework of Cohesion policy. This policy is the primary EU initiative aimed at reducing regional imbalances and addressing structural changes within the EU (WWF EPO, 2021). The fund will be provided with 17.5 EUR billion[9] and this sum will represent newly allocated funds to assist EU member states in their transition towards environmentally sustainable practices. The fund aims to mitigate the socio-economic consequences caused by climate transition by providing help for the diversification and reorientation of the affected regions.
- **The Just Transition Territorial Plans**: in order to address the economic and employment hurdles of transitioning to a climate-neutral economy, priority should be given to regions facing the most adverse economic and social consequences. As a result, carbon-intensive regions have been given a special status in the JTM. These specific territories are covered by the Territorial Just Transition Plans (TJTP) and address the communities, labour markets and economic activities affected by the energy transition. More specifically, the TJTPs address some broader social impacts, such as: transforming declining sectors within the regional economy, jobs that are potentially lost or affected because of the transformation or closure, reskilling or upskilling needs are identified within the communities, broader social impacts on living conditions energy poverty or access cu public services (EC, 2021).

The Just Transition Fund in Romania

At the national level, local government implements just transition measures through both the Territorial Just Transition Plans, as well as the National Energy and Climate Plans (NECP) and the National Long-Term Strategies. At this moment there are six Territorial Just Transition Plans in Romania for the following counties: Hunedoara, Gorj, Dolj, Galați, Prahova and Mureș. Out of the six, Gorj, Dolj and Hunedoara are coal regions, and the remaining three have been designated as carbon intensive, mainly as a result of industrial activity in steelmaking, oil refining, and fertilisers manufacturing. Most of these Just Transition Plans strongly focus on

[9] Adjusted for inflation to 2018 prices; €19.2 billion at current prices.

the economic aspects of transition, while glossing over some social assistance measure aimed at the most vulnerable communities. Each plan emphasises the need for support for businesses and providing essential assistance for creating new jobs in the context of the energy transition. All in all, the implementation of the JTF in Romania is aimed at mitigating the negative economic and social effects caused by the loss of a significant number of jobs through a series of actions supporting workforce transition and sustainable economic diversification by developing businesses and entrepreneurship, especially small and medium-sized enterprises.

Meanwhile, the NECP and LTS have the capacity to outline national targets, policies and measures and to give an adequate assessment of the expected social and economic impact for the energy transition. As a result, the NECP and LTS should include JT as a specific objective and provide adequate measures that will address the previously mentioned challenges and take into consideration the TJTPs and local knowledge and needs. The two documents can also offer a coherent vision bringing together all existing Territorial Just Transition Plans.

The next section delves into the various dimensions of just transition, beginning with a brief overview of existing indicators for addressing it, and provides a methodology for analysing the main climate strategies of Romania, the National Energy and Climate Plan and the Long-Term Strategy. This methodology includes assessment criteria based on previous work[10] on defining just transition and will provide a basis for addressing whether these strategies are fit for purpose. These indicators will focus on four main areas: labour market, gender equality and vulnerable groups, regional development and underdevelopment, addressing both economic and social concerns and health and education.

2.2.2. Assessing just transition in key strategic plans and strategies

Methodology

For this analysis, two key strategic documents have been selected: the draft updated NECP and the LTS. The analytical framework for the just transition section differs slightly from that of the energy poverty section by not covering the draft Romanian Energy Strategy 2022-2030. This is because our preliminary assessment revealed that the draft National Energy Strategy does not address JT aspects and it concentrates on specific elements of the energy sector. In contrast, the updated draft NECP and LTS offer a much broader perspective on the overall impact of the green transition, encompassing more than just the energy sector. On the same note, these two documents have been selected instead of the Just Transition Territorial Plans because just transition as a topic is a cross-cutting element that should be present in all relevant national strategies.

For the assessment of the just transition measures, a separate list of categories has been created to describe specific notions essential for the successful implementation of these

[10] Dilip Kumar (2016), Goddard and Farrelly (2018), Harrahill and Douglas (2019), WWF EPO (2021), Sangji Lee and Lisa Baumgartner (2022), IPCC (2022).

measures. These categories, which should be included in all national strategies addressing this topic are the following:

1. **Labour market:** where specific mentions of actions related to tackling job losses caused by the phaseout of fossil fuels, creation of green jobs, or providing incentives to businesses in developing the job market from affected regions are addressed.
2. **Gender equality and vulnerable groups:** this section mentions various measures which address inequality and also issues related to the needs of vulnerable groups in the process of transitioning to green energy (such as: addressing job inequalities, income or educational inequalities).
3. **Regional development/underdevelopment (both economic and social concerns)**: which looks at whether documents mention specific measures for carbon-intensive and disadvantaged regions in Romania.
4. **Health and education:** addresses whether the documents mention any measures which specifically address the educational sector, or highlight the importance of clean energy topics for primary, secondary and upper education.

The developed methodology is similar regards to structure to the one previously used for assessing energy poverty measures, although with slight changes. Four categories are included in the analysis:

1. **Definition:** items which evaluate the definition of this concepts in the national strategies;
2. **Monitoring and implementation measures:** items which refer to the monitoring and implementation of just transition measures;
3. **Resource allocation**;
4. **Processes and procedures**.

The methodology used for this analysis is based on a 3-scale assessment:

0	The absence of the assessed category.
1	A general reference to the concept, with no specific details.
2	A detailed reference to the concept with specific details.

Each item will be graded according to the values indicated in the brackets. Using a 3-scale assessment has proven more effective for analysing just transition measures. Our preliminary assessment showed that these measures are not well addressed as energy poverty measures are in the two national strategies. Consequently, a 4-scale assessment would not have added value to our analysis, as it would have resulted in lower scores than necessary for the actual levels of inclusion of just transition items.

The results will be added up to a mean per each category, which describes one of the following situations:

0	There is no concern for the topic.
1	A marginal concern for the topic is visible.
2	The implementation of the framework is in progress, and there is proof of actual implementation being done.

A total overall assessment was compiled based on the mathematical average of the six scores awarded for each of the categories identified. The score for the six categories was obtained from the mean of each indicator for each category. A more detailed breakdown of the methodology and the selection of scores for each category can be found in the Annex.

Assessment of The Draft Updated National Energy and Climate Plan

Definition: 1 out of 4. Overall, the document briefly mentions JT as a topic, although specifically only in the context of either the coal phase-out or when discussing energy poverty. No specific definition of JT has been upheld by this strategy, besides some general topics (such as employment or reskilling) that address measures either mentioned in some TJTPs.

Governance: 0.6 out of 6. While this document does mention certain institutions responsible for implementing measures related to JT, it primarily focuses on broad and well-established topics such as education or employment, which are already covered in existing TJTPs.

Resource allocations: 1 out of 2. The strategy mentions the Just Transition Fund as potential financing but fails to mention how it is going to allocate these funds, or provide additional reasoning for this allocation. As a result, there is a need for designating a specific allocation of resources per actions.

Processes and procedures: 1 out of 4. The coal phase-out is the only topic related to JT which receives a very specific timeline and already designated legislation and procedures. This very strong emphasis on phasing out coal could be detrimental to other aspects of a just transition, as it would necessitate excluding the other carbon-intensive regions in Romania. Topics such as education, job market, and reskilling that are relevant to JT are closely connected to the issue of energy poverty, and throughout this strategy these themes do not have specific protocols and methods in place.

Overall score: 0.9. Based on this score, we can conclude that there is a very marginal concern for the topics of just transition. The plan focuses more on topics related to innovation and research than to the impact on communities (health, education or the process of reskilling). It also lacks a more efficient allocation to emphasise how each priority area will be funded. For example, the plan already mentions some targets related to energy and mobility, modern energy generation technologies with low or zero emissions, digitalisation in energy, energy storage, and technologies for environmental management and for the circular economy, but it does not provide any details on how each of these targets will benefit from the Just Transition Fund, or from Recovery and Resilience Plan (RRP). No additional information is given on the specific actions for achieving these targets and how these actions will be

financed from the Just Transition Fund or the RRP. There is a need for a more specific plan of action for tackling the objectives for just transition, more precisely for assigning specific actions for involved institutions.

It is also worth mentioning that although the draft updated NECP places a great importance on research education and professional reconversions, it should also take into consideration the demographic characteristics of the individuals that could benefit from such programmes. Most of those affected by the energy transition (especially mining workers) are between 40 and 50 years of age, which is why professional reconversion must be based on the cross-sectional skills they have acquired, reconversions to related fields, as well as the provision of a social assistance scheme during the recovery period.

Lastly, an effective governance framework should also encompass problems that extend beyond the typical impacts of employment and education. One example would be addressing the potential effects of school dropout, or migration and depopulation, through targeted social assistance policies specifically made for these carbon intensive regions. Besides the negative consequences that job loss can have on adults, the effects can be particularly dramatic for children. More precisely, a reduction in household income can result in a higher chance of school dropout for children, and can also have long-run adverse effects on children's future income and human capital, including a lower chance for a better education in the future (Di Maio & Nistico, 2019) (Nita & Parvu, 2023). Families with schoolchildren would benefit from a social aid scheme, from a case-by-case mentoring, tutoring and initiatives to engage parents in their children's education and more for and investments made for more accessible education for children in just transition areas.

Assessment of the Long-Term Strategy for the Reduction of Green House Gas Emissions

Definition: 0.5 out of 4. The plan does not give a high level of attention to JT. Although several related actions such as education, public health, air quality, and the impact on the job market are discussed, JT is never explicitly stated as an objective. A clear definition is essential to establish an action plan with cohesive and coordinated measures.

Governance: 0.6 out of 6. Although mentioning some specific action points and timelines for the coal phase out, there is no overall lager plan for a more guided intervention in carbon-intensive regions. Municipalities are cited as responsible for evaluating the implementation and advancement of JT measures, which is commendable for grounding this strategy in local expertise tailored to the requirements of the energy transition. However, there is a lack of specificity regarding their engagement in the process.

Resource allocations: 1 out of 2. The LTS makes no mention of the Just Transition Fund or other funding streams. This oversight is significant because the fund is specifically designed to allocate resources to support vulnerable regions during the energy transition, making it a valuable source of financing. The strategy mentions on the other hand some other local and EU level financing, such as the National Programme for Rural Development, the National Recovery and Resilience Plan, Horizon Europe calls, the Social Climate Fund.

Processes and procedures: 1 out of 4. This document solely concentrates on specific aspects within the realm of JT, with its referenced processes and procedures focusing solely on their

implementation. Incorporating timelines for research development and the implementation of new educational programmes aimed at addressing the demands of the emerging renewable energy sector would have enhanced coherence and provided a foundation for planning additional policies and initiatives. Providing some timelines for the development of research and implementation of new educational programmes for tackling the need in the new renewable energy sector would have provided more coherence and given a background to start planning for other policies and plans.

Overall score: 0.77. The overall score from this assessment indicates that the plan does not properly address the concept of JT. For instance, the definition and mention of JT concepts are scant, with only brief references to actions like education, the impact on job market, or individual health. Additionally, the document lacks a well-structured governance framework and fails to explain how municipalities will be involved in implementing the proposed actions. Furthermore, the document does not address a crucial source of financing for the strategy's objectives, the Just Transition Fund.

2.2.3. Discussion

Romania's framework on just transition seems to be lacking the appropriate definition, approach and commitment to this notion. As a result, both strategies lack a more comprehensive definition of the measures and tools to be used to tackle the process of just transition, although the draft updated NECP seems to approach this topic a little more in depth. However, the term 'just transition' is presented mainly as part of the framework of broader discussions on the topic of energy poverty, or regarding financial support instruments granted by the European Union for the just transition process (more specifically the Just Transition Fund), which is why it would be necessary to define much more precisely in a separate section of the proposed policies and measures. This conceptual separation is necessary because the proposed measures and terms for tackling energy poverty may not cover the entire population affected by the energy transition, given the higher income level of jobs afflicted by decarbonisation.

Although both documents include some elements on just transition, there seems to be an overwhelming focus on a limited set of topics (such as education, especially research and higher education, or green job creation), while completely dismissing others such as gender-specific policies, public participation and transparency or strategies for economic diversification.

Lastly, even though some issues related to reskilling workers in just transition regions are mentioned, these strategies fail to address an important issue which can affect the successful implementation of these measures, such as the demographic characteristics of workers. Age, level of education, family structure and the existing skillset are essential factors that should be accounted for when providing reskilling programmes. Even if all individuals living in JT regions undergo full reskilling, there will still be a significantly smaller number of jobs available compared to the ones that were lost. Therefore, professional reconversion programmes in the just transition areas must also focus on adapting already existing knowledge for other industries that are specifically suited to these regions.

2.2.4. Examples of good practice

Assessing the labour market impact is a key concern in Romania's LTS, which aims to develop green jobs but offers only a very high-level view. Even as other countries are trying to anticipate the economic effects of the energy transition, both positive and negative effects on the labour market are considered, making this a crucial issue for JT. For example, Hungary, Portugal, and Spain expect job growth in the renewable energy sector, while Malta and Portugal foresee job declines in traditional transport, Germany in coal-based energy, Spain in tourism, and Slovakia in manufacturing (Ecologic Institute , 2022). Just transition policies address challenges in carbon-intensive regions, with some LTS tailored to specific needs, such as health improvements in Finland and Austria or better housing quality through energy efficiency in Slovenia and Lithuania.

Greece NECP – a good practice example for resource allocation

The Greek NECP makes a special reference to financing development actions in regions that heavily rely on lignite extraction for electricity production. These initiatives encompass two distinct approaches aimed at mitigating energy poverty by promoting the establishment of energy cooperatives:

1. **Development of sustainable energy sources**, financed by projects carried out by energy communities involving individuals, local authorities, and private/public entities, with the goal of promoting renewable energy sources and mitigating energy poverty.
2. **Energy conservation**: enhancing the energy efficiency of public and private buildings to meet the minimum energy performance standards for buildings and addressing the issue of energy poverty. The focus is on promoting energy communities that involve local authorities as qualified participants.

This approach can be emulated other countries in the area, as it is tailored to the unique characteristics of their coal mines and coal-fired energy production (WWF, 2022).

Czech Republic – a good practice example for governance

Another example of a good practice is the RE:START strategy for economic restructuring of coal regions in the Czech Republic (EC, 2019a). Coal is a significant component of the energy system in the Czech Republic. This strategy highlights the benefits of a unified governance structure that develops a cohesive strategy for all three structurally weak coal mining regions. It aligns with the JT principle by providing a reliable governance framework to implement policies that mitigate the impact of the energy transition on communities dependent on fossil fuel production.[11] In 2017, coal accounted for about 50% of electricity generation and approximately 75% of heating relied on coal. Nevertheless, the country has experienced a significant decrease in coal mining over the past 15 years, resulting in economic strain on the Czech coal mining districts. In light of this situation, the Czech government made the decision to enact a national plan, known as the RE:START plan, aimed at providing support to coal regions that are structurally disadvantaged. The effort was initiated in 2015. During the initial

[11] Karlovy Vary and Usti in the north-west, as well as Moravia Silesia in the east.

three years, the primary emphasis was on formulating a strategy framework, collecting data, evaluating the requirements of different regions, and establishing an efficient governance system (EC, 2019a).

Spain –a good practice example for definition and governance

Spain has implemented a good approach in addressing the impact of the transition by actively involving communities, especially women. For instance, calls for municipal projects include multiple evaluation criteria which aim to prioritize projects that advance women's employment and contribute to the economic growth led by women. These projects also focus on developing structures that serve two purposes: bridging the digital gap between women and men and facilitating women's access to new technologies. In addition, Spain has developed a structured system that facilitates the exchange of information and ideas among businesses, labour organisations, and the government. This framework enables communities to effectively communicate their requirements during the transition period (Instituto para la Transicion Justa, 2022).

2.2.5. Key findings

Romania's framework on just transition lacks the appropriate definition, approach and commitment to this concept. Both the strategies, especially the NECP, provide a very vague mention of just transition, mostly in the context of energy poverty and EU financial support. A precise definition and distinct policy section are needed, as current measures may not cover all affected populations. The focus is limited to topics like education and green jobs, ignoring gender-specific policies, public participation, transparency, and economic diversification strategies. Even if some issues like reskilling are addressed, the documents still do not address the demographic characteristics of workers, risking inadequate implementation. Neglecting issues related to JT could significantly hinder the future implementation of transition policies. Failing to adequately address the impact of the energy transition on individuals in coal-intensive regions will create substantial challenges for the further adoption of clean energy technologies.

3. Public participation

Adequate public participation is a key element for successful climate governance frameworks. By engaging different segments of society in the elaboration of plans and policies, the collective response to the climate crisis can be strengthened and a broader coverage of all interests can be ensured, therefore increasing the level of legitimacy of policymaking. The transition will inevitably bring deep and transformative change, which requires public support. An effective stakeholder engagement process can map the needs of different groups and reconcile conflicting interests. Public participation can contribute to effective climate governance in multiple ways (Smith, 2023a):

- climate policy becomes more robust and ambitious, reflecting the interests, needs and attitudes of citizens;
- existing inequalities are challenged;
- climate action at the political level is strengthened, as political leaders gain the confidence and willingness to take more action;
- legitimacy and public acceptance of climate policies are enhanced;
- citizens and stakeholders become more engaged, climate aware and politically active in climate action.

Even though highly valued as a token of good governance, implementation might not always be straightforward. Sometimes, engagement is only done through stakeholder participation, drawing on well-organised groups which promote a rather narrow set of interests, such as businesses, industry representatives, unions, or environmental NGOs. This narrow implementation leaves out the broader public, which could bring to the table diverse perspectives, including from underrepresented and most vulnerable citizens in the transition process (Smith, 2023a).

3.3 Status quo of the regulatory framework on public participation

3.3.1. EU framework for public participation

There are several pieces of legislation and supporting documents which make up the framework for public participation in the EU:

- **Aarhus Convention**: The European Union, as a signatory of the Aarhus Convention, must ensure that its Member States grant their citizens access to information, public participation in decision-making and access to justice (Aarhus Convention, 1998) Articles 7 and 8 of the Convention set up a legal framework for ensuring opportunities for the public to participate within a transparent and fair framework, with access to all the necessary information, sufficient time-frames for engagement and ensures that the public participation process to be taken into account as far as possible (Aarhus Convention, 1998).
- **Regulation (EU) 2018/1999**: In the elaboration of the NECP and LTS, Member States must make sure that the public participation requirements of the Governance

Regulation are met. Article 10 clearly stipulates that MS shall ensure early and effective opportunities to participate in the preparation of the NECP and LTS, that the public is informed and that there are reasonable timeframes to allow for sufficient time for the public to be informed, participate and express its views. Additionally, in Article 11, the Governance Regulation requires MS to implement multilevel climate and energy dialogues (MLCED), unless they already have a similar structure in place. The MLCED should reunite local authorities, civil society organisations, business community, investors, other general stakeholders and the general public to discuss energy and climate policies, review progress and specifies that the NECP may be discussed within this framework (EU, 2018b).

- **Guidelines for updating the NECPs:** to ensure that the public participation requirements are thoroughly met the Commission stresses that social dialogue and whole of society approach are essential for developing and implementing climate and energy policies. MS must ensure 'an early and inclusive public participation in line with the Aarhus Convention' (EC, 2022). The Commission stresses that a sound consultation implies access to all the relevant documents, reports and assumptions of the plan at the start of the consultation period. The Commission even proposes that MS take into account best practices of public participation in the elaboration of the LTS and NECP and set up consultation through a dedicated NECP website (EC, 2022).

At the time of writing of this report, the updated draft NECP has been submitted by all the EU countries, even though some with substantial delays.[12] The EU wide assessment of the draft updated NECP states that most MS organised public consultations, but the quality of the process greatly varies between countries. The plans do not include details on how the public was informed to participate, the methods used to engage it, and the reasonable timeframes to express views was insufficient. Moreover, most plans do not include a summary of the views and how they were integrated in the policies and measures, as stipulated in the Governance Regulations. As for the MLEDs and the involvement of the local authorities, again, just a handful of MS show evidence of their involvement or of an active dialogue platform (EC, 2023a).

Even though public consultation and stakeholder involvement are considered key governance features and countries which have climate laws establish dedicated provisions for it (Ecologic Institute, 2023)[13], there is strong evidence that the implementation process is alarmingly deficient.

3.3.2. Romania's framework on public participation

Besides the provisions of the Governance Regulation, Romania has its own legislation on public participation. Law 52/2003 concerning transparency of decision-making in public administration sets minimal public participation standards for any normative project that is

[12] As it is the case of Romania, which submitted the draft to the Commission almost half a year after the deadline.

[13] Such is the case of 10 MS (Croatia, Finland, France, Germany, Greece, Ireland, Luxembourg, Malta, Netherlands, Portugal, Spain), which either include general provisions and/or establish permanent stakeholder engagement platforms (Ecologic Institute, 2023).

adopted by the central and local public administration authorities (meaning the ministries and any institution working under the Government).[14] The law dictates that the public authority has the following obligations regarding the normative act project proposal (Official Journal , 2013):

- Publish an announcement on the ministry's website and send it to mass media.
- Communicate it to business associations or other relating entities, if the proposal directly affects the economic activity of the businesses.
- Set at least 10 calendar days for any comments, suggestions, written feedback on the content of the normative act project.
- Organise a public debate only if it is requested in written by a legally constituted association or by another public authority.

The law 52/2003 forms a weak framework for public participation, as its requirements are minimal and not sufficiently inclusive. They do not offer the means for citizens or broader civil society to engage and the required 10 days for public consultations are not sufficient for a thorough public participation process. Moreover, this framework only mandates written feedback as standard, while public debates are only upon request. The law also does not enable any feedback loops to track whether the written feedback was taken into account.

3.4. Analysis of the public participation process implementation

3.4.1. Stakeholder perception on public participation in climate policy

To better understand how effective the public consultation process for the NECP and the LTS was, a survey was conducted among stakeholders and civil society organisations to assess the public participation in major climate and energy strategies.

The aim of this survey was to collect feedback from relevant organisations that have either taken part (LTS) in or may potentially take part in the public consultation process of the NECP revision. The survey was disseminated in September 2023, when the authorities were actively working on updating the NECP and the LTS had been assessed by the Commission and would be adopted by governmental decree in November (Ministry of Environment, Waters and Forests, 2023). The survey was divided into five distinct sections:

1. **Introduction:** Includes introductory questions designed to gather broad information from participants.
2. **Communication:** Focuses on assessing the effectiveness of the communication channels used to distribute information about the public consultation process.
3. **Suggestions and Comments:** Analyses the procedure for providing comments and observations.
4. **Inclusivity and Representation**: Examines participants' perspectives on the inclusivity of the public consultation process.

[14] To be mentioned that the NECP is mainly the responsibility of the Ministry of Energy, while the LTS is under the Ministry of Waters, Forests and Environment.

5. **Public Involvement and Knowledge**: Evaluates participants' opinions on how well the consultation process promoted learning and increased interest in climate governance.

A total of 14 organisations answered the survey, out of which 78.6% were members of NGOs, while a smaller group (21.4%) were members of an employers' organisations.

Introduction

Regarding the participation in the public consultation of surveyed organisations, it was found that only half of them had been engaged in this process. The remaining half, who had not participated, indicated that their non-participation was due to a lack of awareness about the timing and location of the consultation process (see Annex 1). The most frequently cited reasons were:

1. Lack of awareness or knowledge about the existence of this public consultation.
2. Lack of transparency in announcing the necessary details for participation.

These findings were further supported by 71.4% of respondents, which stated that they were unaware of the format in which the consultation sessions had been conducted.

Communication and dissemination

As highlighted in the previous section, the announcements and invitations for the public consultation sessions were conducted with limited awareness for the relevant public. An overwhelming majority (85.7%) of respondents, when asked about the timing of public announcements for the consultation sessions, either indicated that the information was not disseminated in a timely manner or stated that they were unsure about the dissemination.

Similarly, half of the respondents (50%) reported that individuals who raised questions and comments during the consultation process did not receive any information on which comments and suggestions have been accepted. Additionally, 71.4% of respondents stated that they had not received any report on the outcomes of the entire consultation process.

Comments and feedback

The procedure for submitting and receiving feedback on suggestions during the consultations remained largely unknown to survey participants. A mere 14.3% indicated that they have received an invitation, with only 7.1% claimed that the decision-making process during these sessions has been transparent.

As indicated in the general information section, a significant majority of respondents were unaware of the format in which the consultation sessions were conducted. However, a slight majority reported that the sessions were held either online (21.4%) or in a mixed setting (7.1%). In the case of LTS half of respondents did not know how the public consultation sessions have been held, while 28.6% have claimed that a mixed format has been considered, 14.3% have claimed that an online format has been chosen, and a small portion (7.1%) have said that there has been a physical format only.

Notably, despite uncertainty regarding session formats, the most used method for submitting feedback and suggestions was via email, chosen by 9 out of 10 respondents.

Inclusiveness/Representation

Survey responses indicate a perceived lack of inclusiveness in the consultation process. Only 7.1% of respondents, both from NECP, LTS, claimed that information regarding the consultation process was accessible to a broad audience. Additionally, none of the respondents reported awareness of measures taken to accommodate the participation of vulnerable groups or individuals with disabilities.

Public involvement and knowledge

When asked about their awareness of organisations (NGOs) participating in the consultation process, we have received mixed answers from our respondents. Some indicated they had not collaborated with any other organisations, while others mentioned a few environmental organisations such as Greenpeace, Bankwatch, and WWF.

Regarding the impact, a significant majority (83.3%) expressed scepticism about the contribution of the consultation process to a better understanding of current climate regulations. Moreover, 66.7% believed that the consultation process only minimally contributed to a better understanding of current climate trajectories and targets. Respondents further highlighted that the absence of the Ministry of Energy during the consultation for the LTS had led to lots of unanswered questions on targets and potential solutions. Additionally, an overwhelming majority (90.9%) felt that the consultation process minimally improved collaboration between the government and civil society.

Lastly, respondents suggested two main areas of improvement for these sessions, focusing primarily on communication and planning aspects. These suggestions included: the need for more transparency and for better planning throughout the process, implementing a more structured approach involving informal discussions and improve communication of results to stakeholders.

All in all, the participation rate was small, as only half of the surveyed organisations were engaged in the process, mostly due to a lack of awareness about the timing and location of the sessions. Transparency in the feedback mechanisms was also lacking. Many participants did not receive information on which of their comments were accepted, nor did they receive any report on the outcomes of the consultations. This points to the need for a more transparent and responsive consultation and feedback process. The survey also indicated a lack of inclusiveness in the consultation process. A very small percentage of respondents felt that the process was accessible to a broad audience, and none reported knowledge of accommodations for vulnerable groups. This suggests that more inclusive practices are necessary to ensure diverse voices are heard. Respondents suggested that future sessions could be improved through better communication and better planning, along with a more structured approach that includes informal discussions. They also emphasized the need for better communication of results to stakeholders, indicating these areas are critical for enhancing the effectiveness of future consultations.

3.4.2. Implementing public participation provisions

In the process of updating the NECP and publishing the LTS[15], Romania likely did not meet the expected public participation provisions accordingly.

Even though the LTS features a section describing the public participation process, the section outlines the inter-ministerial collaboration process in the elaboration of the document. The document only mentions the date public consultations started, but nothing on received input and it was integrated in the final version (Ministry of Environment, Waters and Forests, 2023). Moreover, the in the assessment of the draft updated NECP, the Commission notes that the document does not include concrete information or details on public participation or consultation process, on whether the public was informed or if means for it to participate were created throughout or after the decision-making process. In this sense, the Commission draws the conclusion that none of the steps in organising a consultation or participation process were established, interest groups were not notified, communication channels and mechanisms to notify and reach out to the public were not implemented and no participation within a sufficient timeframe was provided (EC, 2023b).

Romania is part of the NECPlatfom project, which aims at facilitating the enabling of multilevel energy and climate dialogues in 6 Member States. However, the civil society organisation which chairs this platform as a convenor, did not manage to get on board the civil society and the local authorities for a meaningful discussion around the NECP before its submission (OER, 2023).

The insufficient implementation of public participation requirements has also occurred with the revision of the NECP. The Ministry of Energy, which is the main institution responsible with the NECP drafting, started the public participation process only after the submission to the Commission. A few civil society organisations reacted with an open letter to the Ministry of Energy signalling transparency problems (Greenpeace, 2024).

These concerns were partly addressed at a later stage. The Ministry of Energy extended the initial deadline for written input (until the 15th March) and even organised public debates on the draft updated NECP, which were broadcasted live (Ministry of Energy, 2024). Three thematic public debates were organised on energy security, decarbonisation and energy efficiency and on internal energy market, research, innovation and competitiveness. The NECPlatform started to be active in the later stage of the updating process, as it has organised a roundtable with different stakeholders, central and local authorities to discuss the updated draft NECP as part of the multilevel dialogue platform on energy and climate (OER, 2024). However, the fact that the public consultation process was implemented at only one stage of the document's drafting, which was quite advanced, reduces considerably the chances of stakeholders, local authorities, civil society's inputs being taken into account.

[15] The LTS is of primary interest for this report as it was published in May 2023, with more than 2 years delay from the initial deadline.

3.5. Discussion

Even though there are several pieces of legislation at the EU level which regulate public participation, their implementation is still shaky, with short notice timelines, lack of transparency, informational gaps and no feedback loops. The national legislation is outdated and restrictive for enabling timely and effective public participation. This is demonstrated by the results of the survey, where the participation rate was small, as participants highlighted lack of awareness and communication regarding the consultation process, or not enough time to prepare for it. Thus, even organised efforts from NGOs or stakeholders failed to lead to effective participation. Better planning and communication are thus key to ensuring that not only stakeholders, but also the broader public finds the avenues to participate.

Partially due to the lack of institutional capacity and resources among public authorities, the implementation process for the revision of the NECP and formulation of the LTS could not fulfil the requirements of the Governance Regulation. Neither document elaborates on how the public's views were integrated. For the draft updated NECP, the public consultation process happened after the draft was sent to the Commission. As planning documents tend to be outsourced, delayed submissions are not uncommon. In this case, the lack of planning and uncertainty from the government side was reflected in deprioritising public participation, thus altering the quality of the documents and jeopardising social acceptance. This gap is also reflected in the policy design, as the concerns of civil society and the citizens regarding the transition are not reflected in the policies and measures that should target energy poverty and just transition.

3.4 Examples of good practice

3.4.1. NECP revision

Even though almost all of the MS failed to deliver on the Governance Regulation's provisions on public participation, in the EU-wide assessment, the Commission notes that Lithuania is a good example of ensuring public participation throughout the preparation of the draft updated NECP (EC, 2023a). Lithuania is not only championed by the Commission for the way it enabled inclusive and early public participation but it also stands out in civil society assessments (CAN E, WWF, 2023).

Ministries, local authorities, economic partners, associations and the general public were all closely involved in the drafting of the revised NECP, process that started as early as the autumn of 2021. The Lithuanian government set up thematic working groups including ministries, relevant institutions and socio-economic partners. Overall, the working groups were divided into 2 dimensions: decarbonisation: (industry, transport, waste and circular economy, energy, agriculture and forestry) and energy (energy efficiency, internal electricity market, research, innovation and competitiveness) (Ministry of Energy of the Republic of Lithuania, 2023). Besides ensuring the inclusiveness and the reasonable timeframes requirements, the government also ensured transparency, as the meetings were held remotely, were publicly available and recorded on the social networks of the Ministries of Energy and Environment. The consultation process, which basically entailed discussion of measures within the working groups, was fully transparent, accessible and made available all

the information needed for meaningful participation. Presentation on the existing measures, progress assessments and external analysis of the measures were presented to inform the discussion, as well as new proposed measures and analysis. The draft updated NECP states that a wide range of stakeholders, spanning from public authorities to representatives of academia, NGOs, industry, proposed around 600 measures and engaged in the drafting process. The government, with external expert advice[16], selected and evaluated the most effective ones to deliver on the targets.

3.4.2. Document submission

Member States had to submit their Long-Term Strategies by January 1st, 2020 and respect the stipulations of the Governance Regulation in regards to public participation. In this respect, several MS (Austria, France, Latvia, Portugal and Spain) had a high degree of participation from different groups of stakeholders at different stages of the document elaboration (Ecologic Institute , 2022). The format was also diverse, creating sufficient channels for the stakeholders to engage: workshops (Austria), discussions on themed working groups (France), seminars (Latvia), sectoral workshops, thematic events, bilateral discussions and informal meetings (Portugal), written and online questionnaires (Spain). Stakeholders were consulted sometimes during the preparations (Portugal), or before and after the drafting stage (France) or just during the preparation of the first draft (Spain).

When it comes to engaging the citizens at large, only a few MS (France, Portugal, Slovenia) effectively delivered on this aspect and held multiple consultations in different formats (public debates, conferences, presentations) at different stages of the elaboration of the document (Ecologic Institute , 2022). Portugal championed this process, as the LTS was discussed in the preliminary and final stages. Moreover, regional conferences with the public were held around the country, where citizens were explained the implications of the LTS for their regions and could offer opinions. The final draft received 120 comments and opinions from the public (Ecologic Institute , 2022).

3.4.3. Citizens' assemblies

Some countries have democratic innovations in place for public participation, such as citizens' assemblies on climate change. Climate assemblies reunite randomly selected citizens that resemble the wider population[17] in a single forum to learn and debate on climate topics with the end-result of formulating a set of collective recommendations (Smith, 2023b). Spain dictated such a mechanism in its climate law (Ecologic Institute, 2023), while Ireland, France, Denmark, Luxembourg, the UK already implemented it as part of their climate policy framework (KNOCA, 2024).

[16] The draft mentions that the OECD experts took part in the discussions and contributed with suggestions on mitigation measures (Ministry of Energy of the Republic of Lithuania, 2023).

[17] Citizens are selected through a process called democratic lottery, which ensures that there is diversity of perspectives and the power imbalances are adjusted. Democratic lottery entails randomly selecting participants from a pool of candidates with the aim of equal representation of various socioeconomic profiles (FIDE, 2022). The intricacies of the democratic lottery procedure shall not be expanded in this paper. For more details see FIDE (2022) 'Organising a Democratic Lottery'.

Even though citizens' assemblies represent a relatively new tool[18], this unique type of citizen engagement has had an immediate impact. There has been impact on policy, such in the case of the Irish Climate Action Bill, which incorporated most of the recommendations of the citizens' assembly; impact on institutions, where the Danish Climate Assembly is a permanent consultative body; impact on public, in France, the climate assembly (The French Convention) fuelled the debate on the green transition, including the politicians; impact on participants, it incentivised behaviours and attitudes on climate action of the members in climate assemblies (Smith, 2023b).

Climate assemblies are innovative tools to engage everyday citizens, that otherwise would not have the means and the avenue to deliberate on fair and equal terms. The added value for climate policymaking that citizens' assemblies bring is that the experiences of the citizens and their needs can be systemised in recommendations with direct impact on their lives.

3.5. Key findings

Overall, Romania's framework for public participation is weak. It mainly relies on outdated legislation and deficient implementation of the Governance Regulation's requirements. The consultation processes for the LTS and draft updated NECP lacked transparency and the public was insufficiently informed about it, though there have been sone recent improvements. Moreover, the lack of inclusiveness and transparency in the feedback process were highlighted as major gaps. To improve the public participation process, authorities should follow the examples of other MS which enabled early engagement, actively informed the public and created avenues for participation, such as working groups and public debates at different elaboration stages of the document. Even though relatively new tools, climate assemblies also show potential in enhancing the public participation process.

[18] Climate assemblies' popularity has surged only in the past three years (KNOCA, 2023).

4. Conclusions and recommendations

This report has revealed some important gaps in the current framework that addresses the socio-economic impact of the transition. The main climate planning documents treat energy poverty and just transition as a minor subject without formulating effective policies to target and tackle the impact that the individuals will confront in the transition towards a low-carbon economy. The gaps on paper are also mirrored in the implementation of the public participation process in the elaboration and update of the documents, which was scanty at best. Besides having an outdated framework for public participation, Romania also deficiently implemented the Governance Regulation's requirements, leaving stakeholders dissatisfied.

To minimise the risk of potential greenlash, authorities need to effectively address the gaps in climate policies and their formulation through multiple measures.

4.1. Energy poverty

- **Integrate energy poverty as a cross-cutting topic across legislation**. Given that the current framework lacks conceptual coherence, energy poverty should be embraced as a cross-cutting topic; legal and strategic documents should be reviewed for explicit and systematic reference to the legal definition of energy poverty as per law 226/2021.
- **Define targets for energy poverty and clear up institutional responsibilities by the implementing authorities.** Policy should clearly state the indicative energy poverty reduction goals with precise timeframes and the appropriate funding sources.
- **Implement a clear data reporting and monitoring system.** The current provisions for data collection, as per law 123/2012 and law 226/2021, should be integrated in one common system to be periodically updated with new and missing data. Additional indicators should be integrated in the data collection process to assess other vulnerabilities conductive to energy poverty, such as affordability, efficiency and socio-economic status.
- **Develop and implement an integrated energy poverty action plan with clear and targeted social assistance measures that go beyond financial handout and focus on addressing the systemic causes of poverty.** This action plan could be implemented and supported by collecting data and periodically updating it based on the best practices and evidence on the ground and the latest policy developments. Energy efficiency and renewable energy solutions should be prioritised, whereas social solutions should be implemented as transitional or complementary measures.
- **Establish an energy poverty action group at the government level to integrate and coordinate the governance efforts.** The entity should bring together representatives of key ministries (at least ministries active in the areas of energy, labour, buildings, EU funds, health, rural sector, transport and finances), market actors (energy distributors, suppliers, market regulators), and civil society (specialised NGOs, representatives of associations, mayors' associations, experts, etc).
- **Establish one-stop-shops at the local level**. The initiative should have specific attributions in the area of advice, data collection and prognose, and network building.

4.2. Just transition

- **Introduce a just transition definition and objectives in national climate strategies.** More precisely, a dedicated subsection should be created within the sectoral sections of the LTS, which should highlight the measures and designated institutions tasked with addressing the implementation and coordination of measures related to the decarbonisation of carbon-intensive regions.
- **Set up a plan or framework for economic and educational transformation.** Adapting solutions to the needs and characteristics of the local populations is essential for a successful transition. Professional reconversion programmes must focus on using transferable skills and knowledge for other industries that are specifically suited to these regions and adapt to the local population particularities such as age, existing level of education.
- **Address other social consequences of the energy transition.** Since the transition process is a multi-layered social change process, it affects many other aspects of the social life. As family incomes can be impacted by the transition process, a consequence of the income reduction is that families may struggle to support their children's education, leading to higher school dropout rates. Additionally, since policies primarily address job losses due to the coal phase-out, which predominantly affects men, the impact on women is often overlooked.
- **Offer financial support to individuals during the transition process.** Some specific social groups can deeply benefit from social assistance schemes, such as individuals who are undergoing reskilling courses, families with schoolchildren, or single income households.

4.3. Public participation

- **Set clear and detailed public participation procedures.** Current legislation is restrictive in terms of procedures for public participation and it should be updated to include more methods, create avenues and enable the possibility to provide input at every stage of drafting.
- **Ensure early engagement at the incipient stages of drafting the documents.** It is important to engage at least stakeholders and civil society from the beginning of the drafting process, as their input can help shape a common vision of the policies, integrate valuable insights and enhance societal buy-in.
- **Thoroughly define into law what a 'reasonable timeframe' means.** The Governance Regulation leaves up to Member States to interpret what reasonable timeframes are. In the Romanian legislation, 10 calendar days for consultation is the standard, however stakeholders deem this insufficient for thorough engagement and discussions around the planning documents.
- **Make information publicly available through different channels to ensure transparency and adequate access to information.** Authorities need to have a wider and diverse outreach to ensure that both citizens, civil society and stakeholders can timely and effectively access relevant information. Establishing a separate website, a newsletter, partnerships with different media outlets, dedicating more resources to communication departments are just a few examples of how to enhance transparency.

- **Enable different formats for public participation to foster more input from stakeholders/citizens.** Consultations can be done in person or through online workshops, as showcased in the consultation process of the draft NECP.
- **Create avenues and encourage different segments of society and stakeholders to contribute to the public participation process.** Authorities need to have a better outreach for categories which do not necessarily have the means to participate in the public participation process, such as regional stakeholders or vulnerable categories.
- **Enshrine in legislation a permanent stakeholder engagement platform on climate policy with representatives of industries, unions, NGOs, academia, research institutes, local authorities.** Stakeholder engagement platforms can reunite stakeholders periodically to engage and formulate recommendations on climate policy.
- **Ensure that the input of the public and stakeholders is effectively incorporated in the final documents.** Authorities need to incorporate the perspective and knowledge of stakeholders, as a means to enhance public ownership. Feedback loops are important for transparency on how received input was used.
- **Allocate resources (both human and financial) to the implementation of the public participation process.** Organising a thorough and lengthy public participation process will require the time and effort of dedicated staff.

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6. Annex

6.1. Assessing energy poverty

The annex presents a breakdown of the methodology with the scoring system and the full analysis of how the three strategic documents (the draft updated National Energy and Climate Plan, the Long-Term Strategy for Greenhouse Gas Emissions Reductions and the draft Romanian Energy Strategy 2022-2030, with a 2050 perspective) treat energy poverty. Based on the methodology presented in section 2.1.2, the following template for analysis has been developed:

1. **Definition**

a) Reference: the concept is present in the document lexically either as energy poverty, fuel poverty, vulnerable consumer, energy vulnerability or in any other form of expression placed in the semantical area.

0	No reference.
1	Reference but no categorisation.
2	Reference with some categorisation.
3	Reference with complex categorisation and/or an open concept capable of integrating new types of energy poverty (summer/winter energy poverty, energy poverty in relation to mobility, other categories that may become evident in the future).

b) Definition (statement of causes, effects and categories included);

0	No definition.
1	Restrictive definition.
2	Definition with some categorisation (i.e. similar to law 123/2012).
3	Open definition with complex identification of causes and effects and capable of integrating new manifestations of energy poverty that may become relevant in the future.

2. Indicators: types of data collected

0	No indicators used.
1	Reference is made to EU indicators (EU-SILC), no real data collection is performed to reflect the situation on the ground.
2	Some general/associated indicators employed besides EU-SILC reference.
3	Multidimensional indicators are employed (2M, M/2, LIHC, 10%, or other indicators developed at the national level to reflect the situation on the ground).

3. Interventions proposed (financial interventions, including energy efficiency measures or interventions facilitating access to clean and diversified sources of energy; non-financial procedural, governance, behavioural measures)

0	No measures are mentioned.
1	Non-targeted and/or highly exclusive measures are employed. The system relies mainly on social aid measures.
2	Approximated measures are being employed to increase inclusiveness. The system relies on social measures as transitional measure.
3	Highly targeted measures with a prioritisation of energy efficiency and information measures.

4. Governance

a) Institutions designed to evaluate energy poverty, assess the existing intervention measures and develop new ones;

0	No institution is designated.
1	Institutions with general competences are designated (i.e. townhall, ministry).
2	Specific institutions with close competences are designated (i.e. a special service within the townhall or ministry).
3	Institutions with special attributions in the area of energy poverty are designated (i.e. observatory, ombudsman, etc.).

b) Institutions designed to implement energy poverty measures (government or local agencies, public-private partnerships, NGOs and other forms of social cooperation or deliberation)

0	No institution is designated.
1	Institutions with general competences are designated.
2	Specific institutions with close competences are designated.
3	Dedicated institutions with special attributions in the area of energy poverty are designated (i.e. one-stop-shop or similar).

5. Resource allocation (distributive principles or financing sources are indicated)

0	No mention of funding sources.
1	Some reference to funding sources is made, but no special targeting for energy poverty or associated categories is provided.
2	Some categories associated with energy poverty (approximation), or the population at large (blanket measures) are targeted within funding sources.
3	Energy poverty targets are established within funding sources.

6. Processes and procedures

a) Inclusion/exclusion criteria

0	No procedures.
1	Some procedures exist, they may be dedicated or associate to energy poverty; they make proof of a high degree of exclusion and inaccessibility for the population affected.
2	Need for policy adjustment is recognised.
3	Inclusive and accessible procedures.

b) Deadlines for the implementation of reform

0	No deadline.
1	A general timeline indicated.
2	A specific timeline and no milestones are indicated.
3	A clear and specific timeline with milestones is indicated.

Tabel 1. Energy poverty assessment the draft updated National Energy and Climate Plan of Romania

Category	Score	Argument
Definition	1	a) Reference is made to energy poverty, vulnerable and poor consumers. Categorisation is implied with reference to law 226/2021, which is mentioned when describing the energy poverty governance framework in Romania. The measures related to energy poverty reduction objectives are general, no differentiation or targeting are described. b) The document makes reference to the definition of energy poverty according to law 226/2021 with the causes and effects. In addition, price volatility is identified as a factor of energy poverty, which is the root cause for price capping measures. No additional causes and effects are pointed out. The document does not display conceptual openness or an interest to adapt the national energy poverty framework to new possible challenges on the market.
Indicators	2	Implicit reference to indicators is made to the integration criteria for aid provision included in national legislation (i.e. household income, health status and age, consumption threshold). The document makes specific mention of the EU-SILC indicator 'Inability to keep home adequately warm', and with lack of clarity to 'arrears on utility bills' for European comparison. No measurement or targeting potential is allocated to the indicators employed.
Interventions	2+	The objective of the plan is to reduce the number of affected households and to protect the vulnerable population in order to uphold human rights. In terms of measures to be taken in this regard description is sporadic. First, the document makes a brief evaluation of the measures proposed in the first submitted document version. Some of these actions remain unrealized: the adoption of a national action plan on energy poverty. Second, reference is made to the measures implemented under the current energy poverty legislation:1) financial measures (heating benefits and heating supplements for wood, gas, district heating and electricity and price capping; 2) non-financial measures regarding prohibition from disconnection and access to electricity; 3) structural financial measures for energy efficiency in buildings and appliances. Some of these measures are targeted for income groups, some for consumption levels, and others for age or health, some are combined. No evaluation is performed on these measures, no improvement is proposed. Third, the document proposes the implementation of a national assistance informatics system to increase bureaucratic efficiency and reduce bias and corruption. The elaboration of a just transition law is also considered. The interventions proposed remain limited, with changes proposed to include only discreet energy poverty reduction goals and more administrative objectives.

Category	Score	Argument
Governance	0+	The document describes the current framework and the institutions responsible with energy poverty measures design and implementation, such as the Ministry of Labour, the National Energy Regulator and local administrations. For the objectives set in the previous plan version and still not implemented, the draft updated NECP, proposes a cooperation between the Ministry of Labour and the Ministry of Energy, similar to provisions in law 123/2012. As for the objectives proposed by the current draft- the national social information system or the enactment of a just transition law - the mandates are unclearly described. The document has a rather restrictive vision and projects lack of clarity and detail in terms of energy poverty governance.
Resource allocations	0	No allocation.
Processes and procedures	0	No improvements are described. New objectives are few and lack detail. The dedicated timeline for implementation is general (2025/2030). No clear milestones are mentioned.

Tabel 2. Energy poverty assessment of The National Long-Term Strategy for the Reduction of Green House Gas Emissions

Category	Score	Argument
Definition	0	a) Energy poverty is mentioned once, referring to policies adopted by other EU Member States. Despite touching upon aspects related to energy poverty in many instances throughout the strategy (residential buildings decarbonisation, urban development, the usage of wood for heating), none of these instances is associated with energy poverty. The need for a socially just and equitable transition is pointed out once. b) No definition, no mention of legislation containing a definition.
Indicators	0	No indicators are mentioned.
Interventions	0	No intervention measures are referred to.
Governance	0	No system improvement is proposed, no institutions are designated.
Resource allocations	0	The Just Transition Fund is mentioned as a funding source for the implementation of the strategy along with other financing sources, however, no particular focus is placed on energy poverty.
Processes and procedures	0	The actions identified in the strategy for the implementation of the strategic objectives are not related to energy poverty. None of the indicated time-frames are specifically related to energy poverty.

Tabel 3. Energy poverty assessment the draft Romanian Energy Strategy 2022-2030, with a 2050 perspective

Category	Score	Argument
Definition	2+	a) The strategy makes **explicit reference** to some categories that are at a higher risk of energy poverty, without being exclusive to others: households without access to energy, including access to renewable sources, low-affordability households affected by social exclusion, just transition categories, inefficient households, households that are exposed to climate risks and pollution hazards. Implicit reference is made to the categories referred to in law 226/2021. In terms of conceptual flexibility, the strategy has a broad and open understanding of energy poverty, with the possibility of including new vulnerable categories. b) The document does not make mention of any definition of energy poverty. A few causes are identified directly: energy inefficiency of housing, over-consumption, low incomes, high prices and climate change. The document does not explicitly in pointing out energy poverty effects. Express Social exclusion is also mentioned. The strategy points out the need to protect human rights through energy poverty action.
Indicators	1	Energy poverty-related action is presented as a national obligation, which should be accounted for in the NECP. The document makes explicit reference to two EU-SILC indicators: 'arrears on utility bills' and the 'inability to keep home adequately warm'. Another indicator referred to is price affordability. Other EU-SILC indicators, which are usually being used for energy poverty, are not mentioned. The above indicators are used for an overall evaluation of the national situation in comparison to other Member States. They are not part of an indicative objective, nor associated with any actions. For targeting, the Strategy makes reference to law 226/2021 and the just transition principles.
Interventions	2-	The document makes energy poverty intervention a strategic objective (Strategic objective no. 4). The Operational objective 24 is dedicated to the reduction of energy poverty and the protection of vulnerable consumers. Four types of actions are prescribed: 1) structural measures of energy efficiency and access to energy; 2) financial measures such as heating aid and social tariffs for electricity; 3) non-financial measures of protection from disconnection; 4) governance measures related to the implementation of law 226/2021 concerning energy poverty; the improvement of the institutional process for aid allocation, including the operationalisation of the national informatics system to improve aid allocation and targeting; a coordination of intervention measures including with just transition measures. Despite earmarking certain categories, such as energy poor and marginalised households for energy efficiency measures, or integrating energy poverty in the Long-Term Renovation Strategy, no clear steps are

Category	Score	Argument
		identified in this direction. Despite increased interest for remedy actions, there is a lack of clarity on how these will be implemented.
Governance	2	Implicit reference is made to institutions that are usually involved in initiating and implementing financial and non-financial measures, as dictated by laws 123/2012 and 226/2021.Additional needs related to energy poverty governance are identified, but statements are general.
Resource allocations	1-	The Just Transition Fund, EU funds, in general, or the National Social Budget as per law 123/2012 are referred to without any prioritisation principle or a precise allocation of funding.
Processes and procedures	2/0	Some governance improvements are proposed to reduce selection bias, improve bureaucratic performance and equitability. Support admission measures are based mainly on law 123/2012 which have been evaluated as mistargeted, highly exclusive and bureaucratically burdensome (Sinea & Jiglau, 2021). The implementation of law 226 is deemed a priority, however, no specific improvements are foreseen.

6.2. Assessing just transition

1. Definition of the concept of just transition

a) Reference: the concept is present in the document, specifically mentioned as just transition or, mentions any of the just transition items (labour market, gender equality, development for carbon-intensive regions, health and education);

0	No reference.
1	Reference but no categorisation–mentioned as a secondary objective nested within another primary objective.
2	Reference with some categorisation-mentioned as an objective.

b) Definition (for all elements which refer to the just transition items (labour market, gender equality, development for carbon-intensive regions, health and education);

0	No definition.
1	Restrictive definition.
2	Open definition with complex identification of causes and effects.

2. Governance

a) Does the document mention specific measures for tackling issues related to the just transition topics (labour market, gender equality, development for carbon-intensive regions, health and education);

0	No measures are mentioned.
1	Non-targeted and/or highly exclusive measures are employed.
2	Highly targeted measures.

b) Institutions designed to evaluate and assess the existing just transition intervention measures and develop new ones;

0	No institution is designated.
1	Institutions with general competences are designated (i.e. townhall, ministry).
2	Specific institutions with close competences are designated (i.e. a special service within the townhall or ministry).

c) Institutions designed to implement measures (government or local agencies, public-private partnerships, NGOs and other forms of social cooperation or deliberation)

0	No institution is designated.
1	Institutions with general competences are designated.
2	Specific institutions with close competences are designated.

3. **Resource allocation** (distributive principles or financing sources are indicated);

0	No mention of funding sources.
1	Some reference to funding sources are made, but no special targeting for just transition, although mentioning some just transition topics.
2	Just transition topics are targeted and established within funding sources provided.

4. **Processes and procedures**

a) Inclusion/exclusion criteria

0	No procedures.
1	Some procedures exist, they may be dedicated or associate to energy poverty; they make proof of a high degree of exclusion and inaccessibility for the population affected.
2	Inclusive and accessible procedures.

b) Deadlines for the implementation of reform

0	No deadline.
1	A general timeline indicated.
2	A clear and specific timeline with milestones is indicated.

Tabel 4. Just transition assessment of the draft updated National Energy and Climate Plan of Romania

Category	Score	Argument
Definition	1/1	The plan briefly mentions the concept of just transition and refers to coal-dependent regions and border regions. The plan includes certain dimensions and objectives related to just transition, but it does not explicitly state just transition as a separate objective. Instead, it is presented as another component in addressing energy poverty or the coal phase-out. In order for the document to provide an adequate definition for this concepts it would need to 1) map the main challenges and actions for vulnerable communities in carbon intensive regions (challenges such as the economic and educational transition) 2) include the other the carbon-intensive regions that will be targeted (must include already defined in the EU JT strategy (European Commission 2022)).
Governance	1/0/1	The document addresses certain aspects of just transition (such as job transition, economic development, and education in the energy sector), although only for coal-dependent regions, while completely disregarding other just transition issues or other carbon-intensive regions and activities besides coal energy production, such as steel manufacturing, fertiliser production and oil refining. Regarding the designated institutions, specific ministries such as the Ministry of the Economy, Ministry of Energy, and Ministry of European Funds are mentioned in relation to providing support to reskilling and training institutes in certain regions undergoing a just transition. The same institutions are also mentioned as being designated for implementing the coal phase-out. No institutions are mentioned specifically for implementing just transition policies, since the document focuses on JT only in the context of the coal phase-out, although some measures mentioned in the document will involve drafting, adoption and implementation of a dedicated just transition law with concrete measures to minimize the adverse effects in certain regions.
Resource allocations	1	The Just Transition Fund, EU funds in general or the National Social Budget as per law 123/2012 are mentioned for funding research and development for clean energy technologies without any prioritisation principle or a precise allocation of funding, and without mentioning any budgeting allocated for addressing the social impact.
Processes and procedures	1/0	Some processes are mentioned, although, most of them address JT only in the context of coal phase-out, or energy poverty. No specific deadlines for just transition measures are mentioned and no timelines are established.

Tabel 5. Just transition assessment of The National Long-Term Strategy for the Reduction of Green House Gas Emissions

Category	Score	Argument
Definition	1/0	The strategy does not provide a precise description of the concept of just transition. Only a few references are made to related problems within the context of a just transition, such as education, public health, air quality, and the effects of the transition on the labour market. The document also points out the importance of addressing the socio-economic concerns of the energy transition. The socio-economic impact of the energy transition is given a distinct subsection within the strategy, but not linking this impact to Just Transition measures.
Governance	1/0/1	The document mentions some general measures for addressing specific areas such as education, awareness, public health and the creation of green jobs. Furthermore, the proposed scenarios for decarbonisation include the mention of coal phaseout as a strategy, but there is no discussion of integrating it into a just transition plan. Municipalities are mentioned as designed to assess the implementation and development of just transition measures, as well as mentioning the National Strategy for Adaptation to Climate Change for 2022-2030, which was not approved so far, that addresses a lot of the Just Transition topics.
Resource allocations	1	Some local and EU level sources of funding are mentioned, such as the National Programme for Rural Development (PNDR), the National Recovery and Resilience Plan, Horizon Europe calls, the Social Climate Fund, although with no mentions of the Just Transition Fund.
Processes and procedures	1/1	Some procedures and processes are mentioned, although only to some specific topics, such as education/research and green jobs. Only specific timelines related to coal phaseout are mentioned.

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