

**Just Transition Greens Submission on the Draft
Territorial Just Transition Plan for the Midlands**

14 February 2022



Introduction

This survey response is submitted on behalf of the Just Transition Greens.

The survey questions are reproduced below in black font.

Responses are in blue font.

Defined Terms

“affected workers and affected communities” means workers and communities from and within the Midlands who have been or will be negatively impacted by the transition to a low-carbon economy.

“BNM” means Bord na Móna.

“DECC” means the Department of Environment, Climate and Communications

“EMRA” means the Eastern and Midlands Regional Authority

“JTF” means EU Just Transition Fund

“Midlands” means the counties and areas which the Plan identifies as coming within its scope

“the Plan” means the Draft Territorial Just Transition Plan.

“the Regulation” means Regulation (EU) 2021/1056 of the European Parliament and of the Council of 24 June 2021 establishing the Just Transition Fund¹.

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021R1056>

Part 1

1. Are you making your submission as an individual or an organisation – select from below:

Organisation

Just Transition Greens (JTG) have been meeting with local people, public representatives, and experts ahead of the government consultation into the Draft Territorial Just Transition Plan for EU funding in the Midlands region. The JTG position, following this process, is that the Draft Territorial Plan does not meet criteria to be described as a just transition.

This failure poses a threat to Ireland's wider transition away from fossil fuels. A move that will impact every sector of Irish society, from farming to healthcare, over the coming decade.

JTG's position is that there have been two key failings in the transition process in the Midlands:

1. The lack of advance planning for the workforce.
2. Investment in the region does not provide sufficient agency to affected workers and their communities.

For reference, here is a recording of a meeting we held regarding this topic: https://www.youtube.com/watch?v=yz24XLEYL7E&ab_channel=JustTransitionGreens

2. What type of organisation are you responding as?

Other

3. What other type or organisation are you representing?

All-island group, affiliated to but independent of the Green Party Ireland/Comhaontas Glas.

Part 2

Your Views on Making the EU Just Transition Fund Work for the Wider Midlands Region

1. How would you describe the impact of the recent closure of the two power stations (Lough Ree Power Station, County Longford and West Offaly Power Station, County Offaly) and cessation of peat extraction on the wider Midlands region?

Without commenting on the specifics of these particular power stations, it is submitted that the transition away from peat harvesting for peat fired power generation in the Midlands while absolutely necessary from an environmental point of view, has had a deeply harmful effect socially. Jobs lost have not been replaced, workers have not been supported through the transition, and little progress has been made in building a brighter post-transition future for the Midlands.

2. Are there any groups and/or business sectors that you consider have been particularly most affected by these changes?

We consider the 1000 BNM workers, 68 ESB workers and the circa 800 people indirectly employed in industries servicing peat extraction (according to the report detailed in the Plan) who lost employment in recent years as the most immediately affected.

However, this does not fully encompass the thousands who have lost jobs, job security and job prospects in the region since BNM's employment levels of approx. 7000 jobs in the 1980s. They are all part of a transition and legacy of diminishing economic activity.

We would like to see clearer data capture in the Draft Just Transition Plan detailing employment trends in the region.

The Plan should also detail the methodology used, and/or the methodology that will be used, to identify who has been impacted and which communities need support for, and agency within, their own transitions.

3. What do you think are the key opportunities for the region and ways in which it could diversify its economy as it moves away from a reliance on peat? This could include, for example, the development of renewable energy, new tourism opportunities, or utilising natural assets such as the peatlands.

The identification and pursuit of opportunities for the region should be based on input from people presently and formerly employed in the peat harvesting for peat fired power generation industry.

As EU Just Transition funding is intended for them as the most immediately impacted, their views, furnished with any expert advice the workers require, should be centred.

4. Four proposed development needs for the Wider Midlands Region have been identified in the draft Territorial Just Transition Plan. Please rank these in order of importance to you, with 1 as the most important.

i) Modernise the Business Environment and Create Employment Opportunities

ii) Enhance the Skills Profile

iii) Focus on Environmental Sustainability and Industrial Heritage

iv) Enhance the Potential of the Region as a Place to Live and Work

5. Are there other development needs for the Wider Midlands Region that should be considered?

Yes

If you answered Yes, please let us know what is missing?

[See Part 3 for comments on the proposed development needs.](#)

6. Analysis by the European Commission to inform the preparation of the Territorial Just Transition Plan identified 15 potential actions that could contribute to positive change in the affected territory. These are listed below under the relevant development need. Click the link to read full text.

Please rank them in order of importance under each development need according to which you think would be the most beneficial (with 1 as the most beneficial).

These are provisional proposals for actions. Your feedback on them will help us to further explore and develop these in conjunction with the relevant Government Departments and delivery bodies.

Proposed interventions for Development Need 1: Modernise the Business Environment and Create Employment Opportunities

Action 1: Midlands Green Energy Cluster: Dedicated Staff and Development Plan

Action 2: Midlands Green Energy Cluster: Business Supports and Advice

Action 4: Entrepreneurship and Social Enterprise Training & Support for Low-Carbon Services

Action 12: Expand Midlands Retrofit Programme to Private Housing and Retrofitting Public Buildings

Action 13: Supporting Smart Specialisation Strategies

Proposed interventions for development Need 2: Enhance the Skills Profile

Action 3: Midlands Green Energy Cluster: Training Centres of Excellence

Action 5: Green Ambassador Enhanced Employment Scheme

Action 6: Career Guidance Personnel for Secondary Level Students

Proposed interventions for Development Need 3: Promoting Environmental Sustainability and Industrial Heritage

Action 11: Developing the Midland's Tourism Potential

Action 10: Extension of Peatlands Restoration

Action 15: Support for the EU LIFE Project/Agricultural Training

Proposed interventions for Development Need 4: Enhance the Potential of the Region as a Place to Live and Work

Action 7: Scoping for Development Sites - FDI, Business and Community Facilities

Action 8: Repurposing of Existing Sites - FDI, Business and Community Facilities

Action 9: Community Support Fund for Microenterprise, Active Mobility & Circular Economy

Action 14: Improved Local Mobility

7. Are there other actions not included in the list above which you think should be considered for inclusion?

Yes

If Yes, please set out these out and explain why in your view they would be a good fit with the development needs of the impacted region and in what way they would link with the transition process.

Please bear in mind that we only need to identify high level, broad types of interventions, and not specific projects to support.

Preliminary Remarks

In broad terms, actions suggested by affected workers and affected communities should be considered with high priority. And where actions have a natural “home” in a governmental department or agency, the cabinet/government should agree to a principle that prioritization of sufficient resources should flow to the Midlands JT process to support these actions. This would clearly demonstrate the commitment of the state to the opportunities for the Midlands and the importance of a Just Transition. EU JTF funding could then be directed more directly towards empowering affected workers and affected communities.

Arts and Culture

The arts are, by and large, low-carbon pursuits. In light of this, affected workers and affected communities should be empowered to pursue the arts by the Just Transition Fund, and artists encouraged to make their homes and workshops in the region. This could serve an important role in the transition by improving the Midlands as a place to live and work. The Midlands could be made a home for the arts. One example of how the arts could add to the transition is that Just Transition Fund monies could be used to fund arts projects which help the people of the Midlands to understand, criticise, celebrate, reflect upon etc. the transition and to project forward to a vibrant, resilient, post-carbon Midlands. But to be clear, the focus should be on the long-term goal of allowing the arts to thrive in the Midlands far into the future.

Energy Assets

Affected workers and affected communities should be given profit-shares and stewardship roles in relation to green energy assets developed by ESB/BNM. This would provide employment opportunities in asset management and maintenance as well as providing a

sustainable source of funding for future community development and community enterprise. JTF money could be used to empower communities to take on these assets and reap the rewards they offer.

Cooperatives

The Midlands could be the new home of cooperatives. An action proposed is to overhaul legislation and provide funding to facilitate cooperative enterprises to generate community wealth building and facilitate local community cohesion and employment. Pilots of this could be fast-tracked by the transferral of buildings and/or energy assets.

Child Care

Recital 14 of the Regulation states that “Support for activities in the areas of education and social inclusion should be allowed, as well as support for social infrastructure for the purposes of child- and elderly-care facilities”. So the JTF is not only about infrastructure, and yet the Plan speaks only of the supporting “infrastructure for the purposes of child- and elderly-care facilities.”

This is a chance to use the funding not just for infrastructure but for operations, to pilot a scheme of free child-care in a certain region, for example in one of the counties in the region. This would have multiple benefits.

Firstly, it would have long-term benefits for the levels of educational attainment in the region, which the Plan highlights as being below average.

Secondly, it would represent a strong action toward gender equality. Recital 15 of the Regulation states that “gender equality should be promoted. Women’s labour market participation and entrepreneurship, as well as equal pay, play an important role in ensuring equal opportunities.” Yet the Irish Plan makes no mention whatsoever of gender equality. Free child care in a defined region would be a significant step toward gender equality, in allowing labour-market participation, and thus in ensuring equal opportunities.

Thirdly, it would be a significant factor in attracting young families to stay in or to move to a county. And this would in itself drive the economic development of the area.

Private investment

The Regulation cites, as one of the result indicators for the JTF, private investments matching public support (Annex III). It is true that the region will need to seek private investment, and that such investment will be a sign that the plan has been successful, but if public support from this fund is to be matched by private credit, loans through local banks should be prioritised over international and national funds and financial intermediaries.

8. Are the other two pillars of the larger Just Transition Mechanism of interest to your organisation? These are Pillar 2: InvestEU and Pillar 3: Public Sector Loan Facility (see more information on these Pillars below)

Pillar 2: InvestEU

Yes

Pillar 3: Public Sector Loan Facility

Yes

If Yes, please outline your area of interest

It is vital that affected workers and affected communities by the transition are empowered to access and benefit from financing arrangements under Pillars 2 and 3.

Part 3: Responding to the Draft Territorial Just Transition Plan

This part of the survey requests feedback in relation to the text in the draft Territorial Just Transition Plan. To help you complete this, the sections of the draft plan for review are included on the following pages.

Section 1 of the Territorial Plan - Outline

Do you have any comments on the draft text in Section 1: Outline of the transition process and identification of the most negatively affected territories within the Member State?

Yes

Please review the text and add your comments below

Section 1.1 - Expected Transition Progress

Outline of the expected transition process towards the Union's 2030 targets for energy and climate and a climate- neutral economy of the Union by 2050, in line with the objectives of the integrated national energy and climate plans and other existing transition plans with a timeline for ceasing or scaling down activities such as coal and lignite mining or coal-fired electricity production

The Regulation, at Article 11(2)(a), states that a territorial just transition plan must include “a description of the transition process at national level towards a climate-neutral economy, including a timeline of the key transition steps towards the Union's 2030 targets for energy and climate and a climate-neutral economy of the Union by 2050 which are consistent with the latest version of the integrated national energy and climate plan.” This timeline of key transition steps is not currently included in the Plan.

It is important to highlight that the prospect of increased funding for this Just Transition is tied to GHG emissions reductions in the long term, so that there is added incentive to continue to reduce emissions. As per Article 5 of the Regulation 2021/1056, if the fund is increased in later EU budgets, the increase will be distributed among countries based on a set percentage increased pro rata with the level of reduction in GHG.

Section 1.2 - Territory Identification

Identify the territories expected to be the most negatively affected and justifying this choice with the corresponding estimation of the economic and employment impacts based on the outline of Section 1.1

A comment on the territorialisation of funding: the distribution of the monies allocated to this EU Just Transition fund are intended to focus on those territories that are the most affected by the climate transition process, but we should not lose sight of the reality that sectoral environmental effects and the social effects of the transition are not limited to any particular territories, so that those outside of these particularly affected territories must also be kept in consideration.

For example, transport and agriculture are both high-emitting sectors at present and activities in these sectors are spread all across Ireland. People linked to these sectors will be affected by the net-zero transition and they must not be left behind.

Several questions arise in this regard which the government ought to consider:

- Do we manage transition across whole industries?
- Or do we do it geographically in line with our government structures?
- What's best in terms of the agency and self-determination of workers?

Section 2 of the Territorial Plan

Do you have any comments on the draft text in Section 2: Assessment of the transition challenges, for each of the identified territories?

Yes

Section 2.1 - Impact Assessment

Assessment of the economic, social and territorial impact of the transition to a climate-neutral economy of the Union by 2050

We submit that the impact assessment in the Plan is not sufficient **and not compliant with the Regulation.**

Firstly, it fails to include the following items despite these being legally required under Article 11 of the Regulation. It is worrying that the Plan, as currently drafted, is incompatible with EU law. The DECC and EMRA need to be careful that they adhere to EU law in all matters relating to the JTF from hereon. This is important for the security of the JTF monies insofar as the Midlands cannot afford for the EU to withhold money due to non-compliance with EU law.

The Regulation, at Article 11(2)(c), requires:

an assessment of the transition challenges faced by the identified most negatively affected territories, including the social, economic, and environmental impact of the transition to a climate-neutral economy of the Union by 2050, identifying the potential number of affected jobs and job losses, the depopulation risks, and the development needs and objectives, to be reached by 2030 and linked to the transformation or closure of greenhouse gas-intensive activities in those territories;

Notably, the Plan contains no environmental impact assessment, no social impact assessment and no depopulation risk assessment.

The Plan ought to include:

- Evaluation of impact on the region if high-tech, low-human-resource industries are the only ones available to replace manual labour.

- Impact assessment of wealth creation from semi state companies: e.g., what assets are required for those companies to be viable and what assets could be transferred to enable community wealth building in the region?
- Assessment of the financial status, land ownership, etc. of the midlands and how this process could address any issues therein.
- Assessment of how many people have gone through training so far - what have their outcomes been?
- Assessment of how many jobs/new enterprises have been created so far - and how do they rank in terms of quality and sustainability?
- Assessment of progress made in terms of peatland restoration as well as the future goals in terms of carbon sequestration, biodiversity and habitat restoration
- **Mental health and wellbeing analysis:** In general, we must be anxious to ensure that the social and emotional scarring suffered by mining communities in places like Britain and the Latrobe Valley in Victoria, Australia are not similarly experienced in the Midlands. This section claims to offer a social analysis but fails to offer any discussion of the potential impacts that the transition will have on the following:
 - Mental Health of Workers who have/will be made redundant;
 - Integrity of the social and community circles which were in the past anchored by connections to BNM/peat extraction/fossil-fuelled energy generation;
 - Self-esteem of people in the Midlands region, in particular insofar as this is affected by the potential status of the Midlands as a “rust belt” region

Section 2.2 - Development Needs and Objectives

Development needs and objectives by 2030 in view of reaching a climate neutral economy of the Union by 2050

Agency, Democracy, and Self-determination

We propose a further development need built around Agency and Self-determination. This would underpin all other development needs, actions, and strategies. The Plan as currently drafted is disappointing in that it contains no prospect of substantial change in the economic power structures of the Midlands.

The Midlands region was the powerhouse of Ireland, producing fuel and agricultural produce; and has since seen these markers of self-reliance and identity diminish. Generations of people in these counties put their lives into building the infrastructure that sustained them and the rest of the nation. Now, these working communities are forced to seek outside funding for support. This is problematic. Communities must be empowered to sustainably support themselves into the future without the need for constant and perpetual drawdowns of EU and/or state money.

These communities know their environment, and their own development needs, better than anyone else; they want to create sustainable futures for themselves and their families and neighbours. JTG would like to see committed support for a return of agency to the region to help realise the communities' objectives.

For example, see our suggested action concerning community ownership of energy assets.

Sustainability

This comment refers to Development Need 3. Environmental sustainability needs to encompass more than the Climate Action Plan-focused measures. The region's transition needs to address environmental sustainability through a planetary-boundaries perspective, considering environmental dimensions such as water quality, biodiversity, land use (including land use change and forestry), and pollution. Reframing sustainability in these plans to encompass EU directives for habitats, water, and post-Aichi targets for biodiversity will give grounding and ambition to the plans - and help future proof the region as a thriving place to live, work and visit.

It is our opinion that this 'Need' attempts to encompass a range of spheres that have some overlap but not enough to justify such reductive categorisation. Environmental sustainability is a driving force behind the transition away from fossil-fuel extraction in the region, does it not require a 'Need' of its own, rather than devolving into a series of actions built around tourism?

Tourism is undeniably a potential opportunity, in terms of a by-product of the history of the transition and unique work being done to retain and redevelop habitat, but the significance of Irish boglands on a planetary level must lend it a significance, and a set of clear ecological support actions, of its own.

Non-Compliance with the Regulation: Expected Contribution

The Regulation, at Art. 11(2)(d), requires Territorial Just Transition Plans to include:

“a description of the expected contribution of the JTF support to addressing the social, demographic, economic, health and environmental impacts of the transition to a climate-neutral economy of the Union by 2050, including the expected contribution in terms of job creation and preservation;

It is submitted that the Plan falls short on this item as the Plan contains no quantified aims or ambitions. It merely lists possibilities for action. Clear and quantified ambition for the affected workers and affected communities is legally and morally required here.

In addition, guidance as to the timing of the proposed actions is needed. If affected workers and affected communities know when the JTF supports are likely to come, they will be better placed to plan for and benefit from the supports. It is important that where assurances as to the timing of transition processes are made, that they are adhered to.

Non-Compliance with the Regulation: SME Focus

Article 11.2 of the Regulation states that:

“A territorial just transition plan shall contain the following elements...

“(h) where support is to be provided to productive investments in enterprises other than SMEs, an indicative list of operations and enterprises to be supported and a justification of the necessity of such support through a gap analysis demonstrating that the expected job losses would exceed the expected number of jobs created in the absence of the investment.”

Strangely, the Irish Plan has changed this to “The Territorial Just Transition Plan *may* also include” such an indicative list and justification (emphasis added). This is clearly in breach of the Regulation. More crucially, the thrust of the European Fund is the promotion of SMEs within the areas affected, so that the Irish Fund should give priority in any tender or funding to SMEs whose base is within the territories in question, rather than allowing external enterprises win contracts based on prior experience and size. Currently, the plan makes no mention at all of the need to promote SMEs, or the need to give precedence to local enterprises.

In fact, the Plan currently speaks of providing office space, in order to “offer businesses attractive landing spaces,” but unless local companies, or companies that would set up their base in the area, are helped to develop, those companies will be pushed out by larger external operators, and those spaces will sit idle.

Section 2.3 - Consistency (Other Plans)

Consistency with other national, regional or territorial strategies and plans

Lack of Consistency Analysis

The Regulation requires that the Plan contains an assessment of its consistency with other relevant national, regional or territorial strategies and plans.

The plan does not contain such analysis! This is a clear breach of the Regulation.

For example, under “National Development Plan 2021-2030”, the Plan merely provides a very brief description of this document and states that JTF supports will need to be consistent with the National Development Plan. This misses the point. The regulation requires that the Plan itself be assessed for consistency with other plans, not that supports contemplated by the Plan are consistent with other plans.

Further Plans for Consideration

In Ireland, the National Economic and Social Council (NESC) has proposed the following definition: “A just transition is one which seeks to ensure transition is fair, equitable, and inclusive in terms of processes and outcomes”. This this requires an assessment of inclusivity across many cultural, socio-economic, racial and gender policies not currently detailed.

Other plans against which the Plan should be analysed:

- National Traveller and Roma Inclusion Strategy
- National Action Plan Against Racism (when published)
- National Biodiversity Plan (particularly with updated targets for the post-2020 Global Biodiversity Framework and in light of IPBES Global and Regional biodiversity reports)

- National Retrofit Plan
- Further Education and Training Strategy
- Apprenticeship Action Plan

Section 2.4 - Operations Envisaged

Types of operations envisaged

General Remarks

1. On the whole, we are not particularly impressed with the actions suggested in the Plan. In particular, we are concerned by:
 - a. The absence of specific targets in terms of job-creation; and
 - b. The failure to centre attention on those most affected by the transition.
2. Where no comment is made in relation to a particular action, this should not be interpreted as an implicit criticism nor an implicit endorsement.
3. In overall terms, if the principles of Agency and Self-Determination as discussed above were incorporated into the Plan, and the actions, we would view this as a welcome improvement.
4. Where these actions have a natural “home” in a governmental department or agency, the cabinet/government should agree to a principle that prioritization of sufficient resources should flow to the Midlands JT process to support these actions. This would clearly demonstrate the commitment of the state to the opportunities for the Midlands and the importance of a Just Transition. EU JTF funding could then be directed more directly towards empowering affected workers and affected communities.

Development Need 1: Modernise the Business Environment and Create Employment Opportunities

Action 1.1: Midlands Green Energy Cluster: Dedicated Staff and Development Plan

A green energy cluster located in the Midlands, supporting the development of renewable and sustainable energy technologies. Would entail creating a development plan which would include dedicated staffing to develop the proposal, carry out a cluster mapping exercise and co-ordinate a vision to carry forward into implementation stage.

This should focus on supporting affected workers and affected communities. Communities affected by the development of renewable energy assets should be accorded profit shares. Start-ups based on the cooperative and social enterprise models should be supported as a priority. Support staff for a cluster should come from the Midlands. Special consideration should be given to aspects of the renewables industry which could involve redeployment of workers previously involved in physical and manual labour. e.g., Solar PV installation, operation and maintenance and site maintenance for solar PV and wind.

Action 1.2: Midlands Green Energy Cluster: Business Supports and Advice

Support the skills capacity for the development of the green energy cluster and the Midlands Retrofit Programme through providing business supports and advice for construction workers and businesses on how to establish and grow one-stop-shops for retrofit projects.

Action 1.3: Entrepreneurship and Social Enterprise Training & Support for Low-Carbon Services

Fund staff and training to create business incubators focusing on supporting enterprises to set up in the green economy. Could include technical advisors to evaluate and mentor emerging low carbon projects and advise businesses on how to transition to more sustainable practices and engage with the green energy cluster. Provide mentorship within communities.

This should focus on supporting affected workers and affected communities. Start-ups based on the cooperative and social enterprise models should be supported as a priority.

Action 1.4: Expand Midlands Retrofit Programme to Private Housing and Retrofitting Public Buildings

In line with energy efficiency priorities, retrofit private housing to be part of an expanded Midlands Retrofit scheme which is focussed on social housing. Also to consider improving the energy efficiency of all public buildings in the region to a level that is commercially viable.

Action 1.5: Supporting Smart Specialisation Strategies

A number of smart specialisation strategies have been identified as areas which could be further supported to enhance the productivity of the region, for example: a Food and Drink cluster, Robotics, Telecommunications and Sustainable Advanced Manufacturing.

This should focus on supporting workers and communities. Start-ups based on the cooperative and social enterprise models should be supported as a priority. Support staff for a cluster should come from the Midlands.

Development Need 2: Enhance the Skills Profile

Action 2.1: Midlands Green Energy Cluster: Training Centres of Excellence

This action would develop and enhance training facilities to enable the region to operate as a retrofit training centre of excellence, also supporting the development of the Midlands Green Energy Cluster, the Midlands Retrofit Programme and the National Recovery and Resilience Plan’s Green Skills Action Programme.

This is a general comment on Development Need 2.

On one hand, the skills profile needs to be diversified and supported beyond technical jobs to low carbon sectors, including the arts, culture, sport, etc.

On the other hand, for green economy technical roles, skills profile interventions need to be targeted in such a way that workers and learners can compete with other skilled workforces. This requires graduated learning, qualifications and skills development through the National Framework of Qualifications (NFQ). The overhaul of apprenticeships in Ireland presents an opportunity for green apprenticeships to have a test bed in the Midlands, supported by cutting edge teaching from Higher Ed.

Action 2.2: Green Ambassador Enhanced Employment Scheme

Develop an enhanced (supported) employment scheme for impacted employees in “Green Ambassador” roles. These roles could be linked with the green energy cluster, circular economy and sustainable waste management objectives. Further training could be offered to provide skills in areas such as baseline energy audits and retrofit of public buildings.

The size and scope of this scheme is not clear. Some estimate of expected positive impact would be welcome. In addition, further details concerning these roles is needed. It would be beneficial to have a mock job description covering duties and activities expected to be performed.

Action 2.3: Career Guidance Personnel for Secondary Level Students

Fund regional career guidance personnel to co-ordinate and provide information to existing career guidance services so that secondary level students are more efficiently matched to further and higher education and job opportunities in the region.

Funding for career guidance personnel is important but should be funded by the Department of Education in its own right.

Action 2.3 should provide for

- design and piloting of green apprenticeships in the region from NFQ Level 5-9, supported by local ETBs, Further Education colleges and Higher Education Institutes. Ability to retain young people in the region and retrain career shifters in this Just Transition for green economy opportunities. These green apprenticeships can be across the green economy, including energy, biodiversity, water quality, circular economy, parkland management, etc.
- Mentorship for set up and sound operation of SMEs, community organisations, cooperatives, etc.

- lifelong learning career guidance, with focus on building expertise for learners who are career shifting due to transitions - this will build up a wealth of expertise that can be drawn on as other regions and industries change in Ireland.

Development Need 3: Promoting Environmental Sustainability and Industrial Heritage.

Action 3.1: Developing the Midland's Tourism Potential

Support tourism initiatives in the Midlands to build on the national JTF tourism projects and Fáilte Ireland's Hidden Heartlands. Tourism is growing in the Midlands on the back of both the new Ireland's Hidden Heartlands brand and renewed interest in the region from the domestic market during 2020 and 2021.

The Midlands represents an excellent opportunity to approach sustainable tourism across multiple affordability levels in a strategic manner, matching the strengths of the region with an ambition to deliver on Sustainable Development Goal target 8.9 for a national Sustainable Tourism policy that promotes local culture and products. The funding from this EU JTF should specifically target the communities and workers of the region impacted by the transition. Fáilte Ireland's Hidden Heartlands programme should not depend on this funding but rather on Action 3.1's ambition.

No money should flow directly or indirectly to Fáilte Ireland without an appropriate gaps analysis showing why the money cannot flow to affected communities and why Fáilte Ireland cannot otherwise fund itself.

Supporting tourism initiatives that have a high bar for sustainability and low carbon experiences, including sports, culture and the arts. Tourism activities, products and services funded through this scheme should not displace existing enterprises, particularly SMEs. Ideally, local SMEs, cooperative and community organisations should be funded to offer tourism and cultural experiences and products that reflect the region in a way that is authentic and reflective of its cultural, industrial, and agricultural heritage in an inclusive manner.

Action 3.2: Extension of Peatlands Restoration

Expand the current peatlands rehabilitation scheme - the current Enhanced Decommissioning, Rehabilitation and Restoration Scheme (EDRRS) - from 33,000 hectares to cover additional hectares designated for rehabilitation or develop an additional/ distinct programme for National Parks and Wildlife Service (NPWS) sites.

The commitment to the restoration of the environment, and the scale of the areas involved, makes this Plan the chance to make the Midlands a European leader in rewilding, with defined targets for biodiversity regeneration in keeping with the ecology of the area.

Action 3.3: Support for the EU LIFE Project/Agricultural Training

Peatlands and People project includes Just Transition Accelerator, Peatlands Knowledge Centre of Excellence and People's Discovery Attraction. Skills development in agricultural practices through upskilling former peat workers to assist in creating local job opportunities. Support, animation and training services to upskill farmers for opportunities in sustainable agricultural activities.

It is not clear whether this action relates solely to the Peatlands and People Project. This should be remedied.

Development Need 4: Enhance the Potential of the Region as a Place to Live and Work

Action 4.1: Scoping for Development Sites - FDI, Business and Community Facilities

Carry out a scoping exercise to identify suitable sites for workspace investment including workplaces suitable for IDA and LEO businesses, remote working hubs and community facilities. This could include unused buildings which could be repurposed for regeneration of towns.

Scoping for suitable sites for development should, in the first instance, benefit indigenous industry. In particular, the focus here should be on initiatives/enterprises set-up, owned, or managed by affected workers and affected communities. Actions 4.1 and 4.2 prioritise Foreign Direct Investment over local community-based, SME and cooperatively run businesses. Whilst FDI is an economic factor, this Plan should be based on community wealth building initiatives so that the communities of the Midlands own the backbone of the Midlands' employment. FDI will flow to a region with good connectivity and facilities, thriving communities and a healthy place for MNCs' employees to live and work. Designing the Plan with MNCs primarily in mind could mean missing the opportunity of a generation for the Midlands.

Action 4.2: Repurposing of Existing Sites - FDI, Business and Community Facilities

Further to Action 7 above, a dedicated fund would be made available to repurpose the existing sites including refitting technology and facilities. This may include unoccupied office space, factories, manufacturing centres, or other spaces.

Ownership of unoccupied facilities should be considered as part of this transition - an objective of this plan and its funding should be to transfer some of these facilities into community ownership. Rental income should directly flow into the region. Values of community cohesion can be embedded into the financial flows (including the assurance to micro and community enterprise that they will not be displaced by large organisations).

Action 4.3: Community Support Fund for Microenterprise, Active Mobility & Circular Economy

A community support fund to enable Local Action Groups to support employment and economic development through micro-enterprises, active mobility and the circular economy. Targeted at supporting small enterprises. Could play a beneficial role in terms of creating direct employment opportunities for displaced workers.

The focus here should be on initiatives/enterprises set-up, owned, or managed by affected workers and affected communities.

Action 4.4: Improved Local Mobility

Put in place improved regional transport links and improve bus links between towns, remote working hubs/offices and educational institutions to ensure better public transport infrastructure for potential employees and address rural isolation. May include electric vehicle charging points.

Services provided to plan and implement this through the funded scheme should stay in the region, ie local and small firms providing the expertise.

The planning for this should be facilitated by and for the region, with a bottom-up approach of building mobility for the vision which the local communities of the Midlands have for their region.

Section 2.5 - Synergies

Synergies and complementarities of the envisaged operations with other relevant Union programmes under the Investments for jobs and growth goal (supporting the transition process), other financing instruments (the Union Emissions Trading Modernisation Fund) to address identified development needs

No comment.

Section 2.6 - Synergies (Support)

Synergies and complementarities with planned support from the other pillars of the Just Transition Mechanism

No comment.

Section 3 of the Territorial Plan

Governance Mechanisms

1. Do you have any comments on the draft text in Section 3: Governance Mechanisms?

Yes

Section 3.1 - Partnership

This talks about the management and control of the fund. The managing authority will be The Eastern and Midland Regional Assembly.

We have concerns about the EMRA managing the fund. The majority of the members of the Assembly are local authority councillors who represent local authorities not within the territory covered by the Plan. Furthermore, the EMRA does not include representatives from Galway, Tipperary or Roscommon. The fund should be governed by representatives from all affected counties and from those counties only.

The governance of the fund needs to be transparent and highly accountable.

Staff hired to govern the fund should be drawn from the affected counties where possible.

The partnership mechanisms need further definition. Partnership should involve the co-design of schemes, not just consultation on drafts. The partnership mechanism should centre the views and voices of those most affected by the transition. The Plan should, of course, be prepared and implemented in accordance with the Regulation, Article 11(4).

Section 3.2 - Monitoring and Evaluation

Describes monitoring and evaluation of the plan – there will be a programme monitoring committee that should include relevant stakeholders to ensure representation across economic, social and environmental dimensions.

The monitoring, ongoing evaluation and accountability measures need to reflect the inequity of power in transitions whereby individual families, small communities and groups of workers are in a much less powerful position relative to state bodies and semi-state organisations.

Representation needs to present opportunities for equitable solutions to be generated within the affected communities, and the plan should articulate some detail of how that is intended to be achieved.

Section 3.3 - Co-ordination and monitoring bodies

The Department of the Environment, Climate and Communications (DECC) is the Member State authority and will have overall responsibility for the implementation of the plan. The Eastern and Midland Regional Assembly is the managing authority for the EU JTF.

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