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Welsh Government

Consultation Document

Just Transition Framework

Date of issue: 04 December 2023

Action required: Responses by 11 March 2024

Overview

The Just Transition Framework:

- Sets out a shared vision about the way Wales will deliver the changes needed for net zero
- Will bring coordination and coherence to the way we think and act about those changes
- Provides a source of information and guidance (including a toolkit) to enable those driving the change to do so in a way which seeks to address current inequalities and avoid creating new inequalities.

In Net Zero Wales¹ (2021), the Welsh Government re-stated its commitment to affect a 'just transition' away from the fossil-fuelled economy of the past to a new low carbon future. Delivering a just transition will mean, as we move to a cleaner, stronger, fairer Wales, we will leave no-one behind. We will develop a clear understanding of the impacts of change, positive and negative, and how to make sure the impacts are fairly distributed in society. In doing so, we have committed to learning lessons from the past and building a future for Wales that supports a wellbeing economy.

Achieving a just transition means thinking about decarbonisation as a way to deliver our commitment to social and economic justice, consistent with our commitment to fair work and Social Partnership. It recognises the technological, social and economic challenges of decarbonisation, and works to identify ways in which we can redress existing inequalities across communities and the Welsh workforce and prevent new ones from forming.

An effective and fair transition needs to be planned and coordinated in a coherent way. We know that meeting Wales' climate change targets will require transformation across all sectors of our economy and society. We also know that we all have a role to play.

The Just Transition Framework sets out set out the Welsh Government's strategic policy approach to achieving a just transition, underpinned by the Well-being of Future Generations Act.

The Framework is also aimed at all partners involved in developing plans and actions for decarbonisation. An outline toolkit is provided at Part 4 to support partners.

This consultation is the next step in developing our approach and builds on our Call for Evidence² published in December 2022. It seeks your views on a proposed Just Transition Framework for Wales. The aim is to publish a final Framework in 2024 which will help Welsh Government and partners in planning and delivering climate action. It will also inform and develop our next Net Zero Wales Plan, which will be published in 2026.

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¹ 42949 Second All Wales Low Carbon Delivery Plan (2021-2025) (gov.wales)

² Just Transition to Net Zero Wales | GOV.WALES

How to respond

Please respond by completing the online form or completing the questionnaire and sending it to: ClimateChange@gov.wales

If you intend to respond in writing, please send completed forms to:

Climate Change and Fuel Poverty Division Welsh Government Cathays Park Cardiff CF10 3NQ

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

Contact details

For further information:

Climate Change and Fuel Poverty Division Welsh Government Cathays Park Cardiff CF10 3NQ

Email: ClimateChange@gov.wales

Mae'r ddogfen yma hefyd ar gael yn Gymraeg/This document is also available in Welsh: https://www.llyw.cymru/crynodeb-or-fframwaith-pontio

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Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. The lawful basis for processing information in this data collection exercise is our public task; that is, exercising our official authority to undertake the core role and functions of the Welsh Government. (Art 6(1)(e))

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about or planning future consultations. In the case of joint consultations this may also include other public authorities. Where the Welsh Government undertakes further analysis of consultation responses then this work may be commissioned to

be carried out by an accredited third party (e.g. a research organisation or a consultancy company). Any such work will only be undertaken under contract. Welsh Government's standard terms and conditions for such contracts set out strict requirements for the processing and safekeeping of personal data.

In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing.

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For further details about the information the Welsh Government holds and its use, or if you want to exercise your rights under the UK GDPR, please see contact details below:

Data Protection Officer: Welsh Government Cathays Park CARDIFF CF10 3NQ

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The contact details for the Information Commissioner's Office are:

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Introduction

Why a Just Transition

With less than ten years left to avoid a climate system breakdown as cautioned by the Intergovernmental Panel on Climate Change³ the need to decarbonise our economies has never been more urgent. Decarbonisation and building resilience to the impacts of climate change is a major policy challenge. The Welsh Government has stated its ambition and legislated for a target of Net Zero by 2050. However, the impacts of climate change and decarbonisation may neither be straightforward nor necessarily equitable, impacting on different sectors, organisations and people in different ways.

The Vision

It is important we have a shared understanding with and among stakeholders of the transition. We have developed a draft vision for the transition set out below.

A Vision for a Fairer, Greener Wales by 2050

By 2050 we will have transitioned to Net Zero making Wales a fairer and greener place to live for all. The transition was delivered in partnership between public, private and third sectors and with our communities. The businesses and industries of Wales are thriving due to long-term thinking by the partnerships created, which ensured our communities and employers were prepared for the transition and have maximised opportunities for the jobs of the future.

Existing and future generations have been equipped with the right skills for good jobs with Fair Work practices ensuring equality, diversity and where workers are fairly rewarded, heard and represented, secure and able to progress in a healthy, inclusive working environment where rights are respected.

Our thriving green industries were created by thinking about the long term, so that our communities and employers were prepared for the transition and maximised opportunities around the green industries and jobs of the future. We ensured we understood the impact of decisions we made in developing our climate policies and actions on workers, communities, people, nature and businesses. This included action to address risks of unethical employment practices and modern slavery in supply chains.

The transition has also helped alleviate health inequality through the climate actions we took to improve people's homes, diet and transport options available to them.

Action on climate change has contributed positively to the culture of Wales and Welsh language enabling positive health outcomes, personal wellbeing, community cohesion and economic growth especially in rural communities.

³ IPCC — Intergovernmental Panel on Climate Change

Throughout, the people of Wales were at the forefront of understanding the climate impact of the way we lived our lives and make the right decisions for themselves, their community and the planet. After unjust transitions experienced by Wales in the previous century, we are proud in making Wales a world leader in the fair transition to Net Zero. We have been able to use our experiences to help those on the front-line of climate change across the World.

Question 1 – What are your views on the proposed Vision for a Fairer, Greener Wales by 2050?

You may wish to consider:

- Whether the vision as proposed reflects your view on what a fairer, greener Wales should look like;
- Any additional factors you feel should be included in the vision.

We need to ensure the transition away from fossil fuels to a cleaner, fairer future in Wales is carefully managed and learn from our lessons of the past. The approach of the Welsh Government is already influenced by legislative requirements including the Well-being of Future Generations (Wales) Act 2015 (WFGA) and the Public Sector Equality Duty. This legislation reinforces the need to ensure that decarbonisation and climate resilience work is carried out in a way that avoids creating or exacerbating inequalities, using the transition to reduce or remove these inequalities. The pathways adopted by the Welsh and UK Government alongside choices made by the wider public sector and businesses will result in positive and negative impacts, on people, the Welsh workforce, businesses and communities in different ways and will interact with global technological and structural societal shifts.

The changes are already happening and we will need a whole-Wales response to ensure we grasp the benefits and reduce any negative impacts. Business, market and wider technological changes are already changing the economy in the journey to net zero. Over the second carbon budget (CB2 2021-25) we have been developing our evidence base and further improving our understanding of how the transition will impact Wales. As our understanding of the impact of both Welsh net zero and wider changes, it is essential we maintain and further build on the involvement of a broad range of stakeholders and partners in our approach and our response. This includes involving people with protected characteristics and from all socio-economic backgrounds. In addition, reflecting our duty to have due regard to children's rights, it will be important to engage children and young people in this process.

Our Approach to Just Transition

Having arisen in the context of the 1970s labour movement, the concept of just transition has evolved and spread to other areas such as environmental justice groups, the international trade union movement, and the private sector⁴. Since its inclusion in the preamble of the 2015 Paris Agreement, it has also been adopted in global, national and subnational policy circles⁵.

Research⁶ commissioned by the Welsh Government shows there is no universally accepted definition of a 'just transition' and a great deal of debate exists around the term, which has led to several different approaches towards its adoption. However, there are consistent themes emerging from the policy approaches that countries and regions have taken towards a just transition. These include the creation of a coordinating framework, long-term planning, capacity building and funds. The proposed Just Transition Framework set out in this document is consistent with these approaches.

With many approaches to a just transition, creating a universal definition, framework or policy approach to a just transition is problematic. However, using our existing WFGA as a guiding framework, our approach aligns with a number of international examples, such as those found in Scotland and New Zealand, where adopting a just transition within a well-being framework has been beneficial. These examples indicate that just transition approaches align with the fundamental goals and intentions of the WFGA, although adjustments to reflect different national contexts are important.

Our approach builds on the WFGA, equality, children's rights and human rights legislation to develop principles to guide the transition. Our proposed approach considers many types of justice. These include:

- Distributive, which seeks to share the burden and benefits of the transition's impact in a fair way and to recognise and address existing disparities between groups;
- Procedural, which aims to provide fair inclusion in decision-making;
- Restorative, which attempts to repair the injustices of the past and harness the benefits to boost communities:
- Recognitional justice considers the socio-cultural differences between people and between groups of people, their different positions in society, and specific needs and vulnerabilities; and
- Intergenerational justice.

Our universal approach can be applied in a range of scenarios including spatial, sectoral or organisational. The approach can also be applied in the development of decarbonisation and climate adaptation policy.

⁴ International approaches to a Just Transition | WCPP

⁵ United Nations, Paris Agreement 2015. P.2 https://unfccc.int/most-requested/key-aspects-of-the-paris-agreement

⁶ International approaches to a Just Transition | WCPP

Question 2 – What are your views on our proposed approach to just transition in Wales?

You may wish to consider:

- The use of the Well-being of Future Generations Act as a guiding framework;
- The types of justice included, and whether there are other types of justice or approaches that it could reflect;
- Any additional factors you feel should be included in the approach.

How was the Just Transition Framework Developed

Building on our previous work and research on international best practice outlined in our approach section, Welsh Government held a Call for Evidence on a Just Transition between December 2022 and March 2023. The Call sought to understand potential negative impacts, benefits and best practices. This included how we apply and integrate learning and knowledge throughout the decisions of the Welsh Government and partners to improve our understanding of the impacts and opportunities for Wales and requirements to support the transition.

We received 117 responses to the Call. The analysis is available here. The information provided has helped shape this document. We have also held conversations with stakeholders and partners to inform this consultation document. This consultation seeks to broaden those conversations.

The Structure of the Just Transition Framework

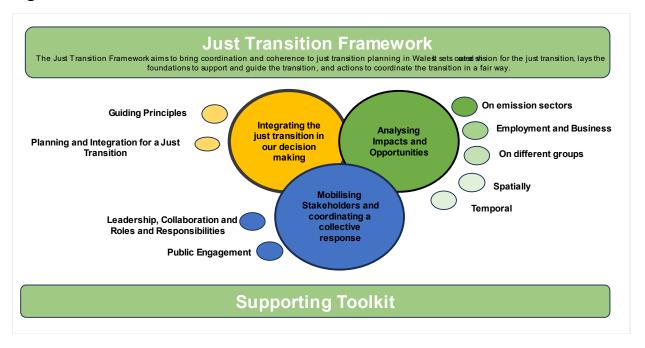
The Just Transition Framework is the first building block towards bringing coordination and coherence to just transition planning for Welsh Government and others involved in transitioning to net zero.

It includes a shared vision and principles to guide the transition and recognition of the need for evidence and analysis on impacts and opportunities. This Framework also sets our approach for mobilising stakeholders and partners. In addition, it includes a series of actions.

The Framework is structured in the following way:

- Integrating the just transition in our decision making: Setting the Vision and Planning for a Just Transition using Guiding Principles;
- Building Our Evidence Base: Analysing Impacts and Opportunities;
- Working Together and Improving Understanding: Mobilising Stakeholders and Coordinating a Collective Response:

Figure 1 Just Transition Framework



Question 3 – What are your views on the overarching structure of the proposed framework?

You may wish to consider:

- Appropriateness of the structure for communicating our approach and actions for a just transition;
- Any additional elements you feel should be included.

Part 1 – Integrating the just transition in our decision making

Facilitating a shared understanding of the context and a vision for a successful transition. Guiding principles will support planning for, and delivery of, a cohesive and effective transition.

Scope

The impacts of energy transitions are likely to extend far beyond just those felt by workers directly employed in industries reliant on fossil fuels. The transition must consider a broader set of actors, issues and opportunities, with more complex interventions than simple job substitution and worker retraining. The transition will affect every person in Wales and takes place against a background of pre-existing inequalities. Setting a definition may limit us in our planning for a Just Transition.

Research⁷ commissioned by the Welsh Government highlighted there is no universally accepted definition of a 'just transition' and a great deal of debate exists around the term which has led to several different approaches towards its adoption internationally. There are variances and several commonalities in the policies nations and regions have taken. Lessons from other countries' approaches demonstrate that for a just transition to be most effective it should not be considered an add on to climate policies but should be **embedded in a wide range of policies.**

In Wales we are uniquely placed to respond to this challenge and opportunity, with just transition planning aligning with the fundamental goals and intentions of the WFGA.

Solution

Our approach is to facilitate a shared understanding of the just transition to Net Zero across government, organisations and communities in Wales. We have developed **Guiding principles** to support the implementation of the WFGA to help plan a cohesive and effective transition and we have identified actions to help **mainstream and integrate our approach** into planning and decision making processes. This will help ensure the transition is carefully managed and consistent, effectively ensuring fairness of the approach. The following section consists of:

- Guiding Principles to help plan and integrate Just Transition:
- Planning for different types of transition: and
- Integration in different decision-making processes.

⁷ International approaches to a Just Transition | WCPP

Planning for Just Transition Using Guiding Principles

Guiding Principles

The Call for Evidence highlighted that the Well-being of Future Generations Act provides a strong framework for achieving a Just Transition to a low-carbon economy. However, there may be differing approaches.

To help enable a consistent approach we have developed guiding principles, which are intended to help plan and integrate just transition in a way that complements the sustainable development principle in the WFGA and Ways of Working. These are based on international best practice identified from research⁸ and examples submitted from our Call for Evidence.

They provide further clarity as to how the WFGA can be used to support fairness in decisions. It also aims to reduce burden by providing advice, aligned with WFGA to help exemplify good practice to ensure climate and social justice is addressed together.

We will develop our third carbon budget plan using these guiding principles and would like others across economic sectors, society and individual organisations use these in their approach to just transition and climate change planning. These guiding principles do not replace the well-being goal descriptions but are additional to help Just Transition planning only.

Figure 2 Well-being Goals and Guiding Principles

Goals	Principles to help guide just transition planning		
A Prosperous Wales	Invest in decarbonisation action and plans and invest in education and skills to support transition to Net Zero. Build the evidence base – Assess the short, mid and long term geographical and sectoral		
A Prosperous wates	contexts. Ensure fairness and equity is embedded in decisions for all including workers, business, including small businesses.		
A resilient Wales	Ensure that transition to Net Zero does not harm but enhances the natural environment .		
A healthier Wales Take into account the health of people and communities as part of planning for meal and actions to achieve Net Zero.			
A more equal Wales	Actively promote equality, children's and human rights and prevent new inequalities from arising while furthering wider equality and human rights across all protected characteristics.		

⁸ International approaches to a Just Transition | WCPP

A globally responsible Wales

Take into account the **global** impact of the transition and prevent offshoring emissions and avoid deforestation.

A Wales of vibrant culture and thriving Welsh language Where decarbonisation support and contributes positively to the **culture** of Wales and the Welsh language, enabling positive health outcomes, personal wellbeing, community cohesion and economic growth especially in rural communities.

A Wales of cohesive communities

At the earliest possible stage identify, **involve** and prioritise all those affected by transition.

Question 4- What are your views on the guiding principles?

You may wish to consider:

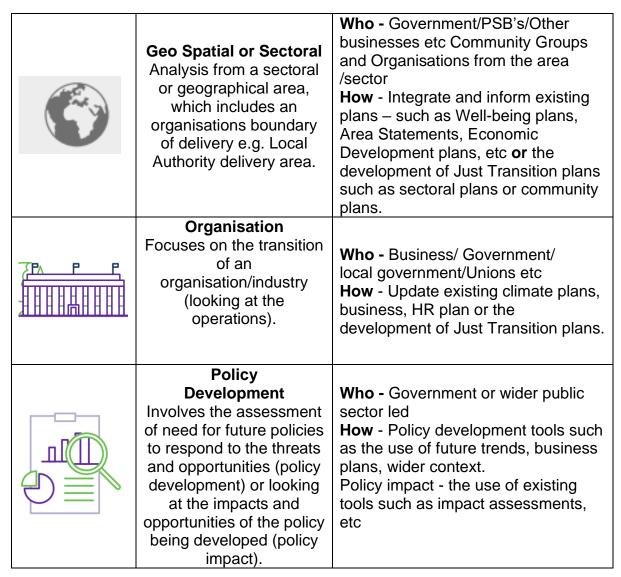
- How effectively the principles will integrate the just transition into decision making;
- Whether these principles would be of use to organisations outside of the Welsh Government;
- How organisations might use or apply these principles to integrate the Just Transition into decision making;
- Whether the principles have any gaps or omissions;
- The link between the principles and the WFGA.

Planning for Different Types of Transition

Achieving the vision will require coordinated and coherent planning. We know meeting Wales' climate change targets will require transformation across organisations, sectors of our economy, society, and the way we develop climate policy. Previous economic and social transitions have shown that uncoordinated and unplanned changes exacerbate inequality and injustice. Planning for our transition will help prevent this happening again but also help grasp opportunities and potentially help alleviate inequalities.

Transition planning will be needed in a range of contexts, from economy wide to community level and from organisational to sector based. We want all those involved in Just Transition planning to collaborate and involve stakeholders in their plans. Example transition scenarios are set out below. For further information please see our Toolkit (Part 4).

Figure 3 Just Transition planning in different contexts





Holistic

Transition Consideration of multiple sectors both within and outside Wales i.e. UK Gov.

Who – Can be used in different ways e.g. Government led looking from a pathway perspective – more strategic – less granular

How - Welsh Government pathway planning

Our approach to a Just Transition gives us the opportunity to develop a more holistic view of our current decarbonisation plans across all levels of society and within organisations, and to consider their impact in line with our commitments to drive fairness and equality in all we do, ensuring we achieve better outcomes for all.

Integration in decision making processes

It is recognised sectors, organisations and others already have different processes and structures, which they are already working within. Based on the WFGA we will look to align and integrate our approach to Just Transition across a range of Strategies, policies and decision-making processes. For instance, public sector bodies already have duties around the WFGA and therefore must have regard to Just Transition planning when fulfilling their Socio-Economic Duty.

Socio-Economic Duty

The <u>duty</u> requires specified public bodies, when making strategic decisions such as deciding priorities and setting objectives, to consider how their decisions might help reduce the inequalities associated with socio-economic disadvantage. This includes making decision to tackle decarbonisation and climate change. Public sector bodies when planning measures and actions to decarbonise must understand the impact of measures. Identifying and involving others in decision-making is key to getting decisions right and making sure they achieve positive outcomes.

In addition, the new Social Partnership and Public Procurement (Wales) Act 2023 places a social partnership duty on certain public bodies in Wales. This will require those public bodies when setting their well-being objectives under the WFGA, and when making decisions of a strategic nature to meet those objectives, to seek consensus or compromise with their recognised trade unions (or, where there is no recognised trade union, other representatives of its staff).

The Welsh Government will update its processes such as the Integrated Impact Assessment to consider just transition. We also would like businesses, the third sector and where appropriate, communities to update their processes to reflect just transition. The Guiding Principles and the Toolkit will also look to assist stakeholders and social partners to integrate Just Transition by providing advice and guidance.

Question 5 - What are your views on the proposed approach to planning for different types of Transition?

You may wish to consider:

- The different types of transition outlined;
- What processes should be used to integrate just transition into decision making;
- Additional contexts or situations where planning for a just transition will be required;
- Any additional factors you feel the Welsh Government should be including in the approach.

Part 2 - Building Our Evidence Base

We need to develop and build our evidence base to understand the social, economic, cultural and environmental risks and opportunities arising from transition.

Scope

As the speed and scale of decarbonisation actions increases, there are significant opportunities to be grasped, however there are also challenges and vulnerabilities for different groups of society, at different times and different places across Wales. We need to have a better understanding of these issues to ensure a fair transition that advances Wales' well-being and contributes to global prosperity and long-term sustainability, without exacerbating existing inequalities.

Solution

The Call for Evidence highlighted that to help Just Transition planning it is essential that the impacts (risk and opportunities) are identified from the outset and captured in an evidence base. Various types of analysis are needed to inform planning and strategies. The potential risks and opportunities arising from a transition need to be understood and, where possible, quantified. These include the possible impacts on employment, social conditions, economic conditions, land management, and the natural environment.

It is particularly important to understand how risks and opportunities will be distributed. Some people will experience greater loss or hardship than others, or will have less capacity to cope with changes because of their gender, age, ethnicity, employment status, disability, or other factors. This can be informed by an analysis of the wider socioeconomic context. The Welsh Government can consider this analysis as part of its policy development processes such as through Integrated Impact Assessments and the development of emission sector pathways. We also would like businesses, the third sector and where appropriate communities to update their processes to reflect just transition.

Through our recent Call for Evidence we started to engage with our stakeholders to build an evidence base to further our understanding, just as others will need to further theirs. We will continue to work with partners to identify and understand the social, economic, cultural and environmental risks and opportunities arising from transition.

Implementation

We have identified the following lenses as needed to understand the impacts and opportunities over time. These are:

- across our Emission Sectors:
- on Business and Employment;
- for different groups of society; and
- in different parts of Wales.

The specific analysis needed – and the most appropriate tools and methods – will depend on the context and the type of impacts anticipated. This may include traditional data such as surveys or more innovative data sources which might become available in the future. Further information on these together with best practice and examples will be set out in the final Just Transition Toolkit to be published alongside the final version of this Framework. We have provided a brief overview for each of the approaches in the section below.

Assess the impacts and opportunities across our Emission Sectors over time.

Our emission sectors are housing, transport, industry and business, the power sector, agriculture, land use, the public sector and waste. Looking at evidence across emissions sector pathways enables mitigation measures with social, economic, cultural and wider environment contexts to be analysed together over a period of time. We have a starting point for considering the impacts and opportunities of these measures across the short, medium and long term as we already have some certainty around some policy targets, ambitions or phase in technologies.

To build on this, our recent Call for Evidence⁹ sought to gather evidence and insights from a wide range of stakeholders, across Wales and the wider UK and from across our emissions sectors. Welsh Government will continue to build our evidence base to support just transition planning working with stakeholders as appropriate. These are reflected in the actions section. Further information on what this means for stakeholders and how others can contribute will be set out in our toolkit.

Assess Impacts and Opportunities on Employment and Business

Labour market disruption is an inevitable part of any economic transition. Transitions will create new jobs, eliminate some, and transform others. In 2023, the Climate Change Committee published¹⁰ their assessment of the net zero workforce. They concluded:

- The majority of workers will not see major impacts, with around a fifth of workers seeing the largest impacts – those that are currently employed in sectors that will have a core role in delivering Net Zero, often in the next decade.
- There is potential for the Net Zero transition to create more jobs than will be lost, in low-carbon sectors, such as buildings retrofit, renewable energy generation and the manufacture of electric vehicles.
- The transition provides a range of opportunities, from driving growth in areas with historically low employment to diversifying the workforce of core Net Zero sectors. However, it also comes with risks.
- Government has policy levers at its disposal to support workers during the transition to Net Zero. It does not need to intervene in every sector of the economy, but clearer plans are needed to harness the potential of the transition and to manage its risks.

¹⁰ A Net Zero workforce - Climate Change Committee (theccc.org.uk)

⁹ Just Transition to Net Zero Wales | GOV.WALES

To plan a just transition, we need to understand how a transition might affect workers, and how different transition strategies can impact employment outcomes. Some parts of our economy will change at a faster rate as new opportunities emerge, and/or in different locations. This could present challenges for businesses and workers to successfully transition, acquiring new or updating skills in a timely manner to meet these future net zero ambitions.

It is important that organisations, workers and others affected, work together to plan the transition. Further information on how to do this will be provided in the Just Transition Toolkit.

Assess Impacts and Opportunities for different groups of society

In Wales, lower income groups or those from more vulnerable groups may be more at risk of experiencing negative impacts, which in turn, means those with protected characteristics are also more at risk. For example, Households Below Average Income (HBAI) data for Wales shows non-white ethnicity is linked with a greater likelihood of relative income poverty, and living with a disabled person makes relative income poverty more likely for children and working age people¹¹. The current economic situation highlights the inequalities that continue to exist in our social system and makes the need for fairness in the delivery of decarbonisation in a way that improves people's lives, more important than ever.

Additionally, the impact of the COVID-19 pandemic, followed by economic challenges has further entrenched health inequalities across Wales¹². The impacts on our physical and mental health have undoubtedly been felt across communities throughout Wales but these have had disproportionate impacts on some people and communities. We know that food and physical activity choices have been adversely impacted in communities where there were already existing levels of health inequalities.

A Healthier Wales

In Welsh Government's recent Call for evidence¹³ it was highlighted that the transition to Net Zero provides an opportunity to improve public health and wellbeing, for example by improving air quality, increasing use of active transport, improving the quality of food production, and providing access to green space. Responses emphasised that ensuring the Well-being of Future Generations Act was embedded into policy was key to ensuring this opportunity was capitalised upon.

However, some responses also noted that those who have disabilities or long-term health conditions are at risk of being disproportionately impacted by a move to Net Zero. People with disabilities and those with health conditions face a disproportionate

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¹¹ Welsh Government (2021). Relative income poverty: April 2019 to March 2020

¹² A review of evidence on socio-economic disadvantage and inequalities of outcome (qov.wales)

¹³ Just Transition to Net Zero Wales | GOV.WALES

impact from living in cold and damp homes. They often need to spend more on heating in order to create a comfortable temperature that alleviates their conditions, especially in the case of respiratory issues. While improving the environmental efficiency of homes will benefits these individuals in the long run, the cost associated with rising bills and making those changes means that they are at significant risk of being left behind.

Whilst adapting lifestyles to meet the cost of living and climate crises brings some opportunity to reduce energy and the consumption of goods and materials. We also know that not everybody across the population creates carbon emissions equally or are able to respond to the challenges having less opportunities or resources. Those most vulnerable to the cost-of-living crisis and the impacts of climate will tend to have lower carbon footprints¹⁴. We will aim to unlock benefits to improve well-being, and to create a more equal and low-carbon society for all.

In ensuring a truly just transition, policy development must prioritise engagement with those who can make the change and the most vulnerable to the transition, including those groups most marginalised to ensure a truly fair approach. We will look to reduce any negative 'spill-over effects' of decarbonisation, grasp any opportunities to maximise benefits to society take opportunities to reduce disparities and avoid offshoring carbon emissions or environmental and social harms. In addition, the third sector, including volunteers, community organisations and community facilities has an important and, in many ways, unique role to play, but also faces distinctive challenges.

We will need to involve people at every stage and that is why just transition is embedded in our guiding principles to public engagement¹⁵.

Assess Impacts and Opportunities in different parts of Wales (Spatial)

Wales' economic and human geography are still shaped by the legacy of industrialisation and prior economic transitions: large urban and peri-urban areas. South and North East Wales developed around coal extraction and heavy industry, and in North Wales settlements and the landscape have been heavily influenced by slate mining, agriculture and the sea. Wales has largely transitioned away from a resource extraction-based economic model, but manufacturing remains a proportionally larger part of the Welsh economy than in the rest of the UK.

The impacts of the transition, both positive and negative may be unevenly distributed across the country, with sectors most exposed to the transition being concentrated in specific regions, many of them already dealing with other socioeconomic challenges. A just transition does not mean these jobs will leave Wales. It means we need to work with key actors including industry, UK Government, and others to support the

¹⁴ It's high time to talk about the climate impacts of high consumers | Sheffield Hallam University (shu.ac.uk)

¹⁵ Climate Action Wales – Public Engagement Strategy 2023-26 (gov.wales)

transition of these industries so they produce products in lower carbon ways. That will require new skills and knowledge.

There will also be opportunities to grow our workforce in Wales, with skills and jobs required to deliver the transition to net zero in sectors, which are not location specific and will be needed across the Wales, such as heat pump installation and jobs for retrofitting buildings.

In 2020, estimates suggest that there were approximately 11,000 direct workers in the low-carbon economy in Wales¹⁶. The majority of employees in the low-carbon economy work in 'energy efficient products', which includes producing and installing energy efficiency products like energy efficient lighting, and energy control systems like smart meters. However, major changes are expected in the future around where new job opportunities will arise. Working with stakeholders and research and evidence will be crucial to managing this change effectively.

Research and Evidence will also be critical to ensure the distribution of the costs and benefits of transition are fully understood by all parties and can support informed decision making. This means identifying, acknowledging and addressing the gaps in our knowledge of the potential impacts of the transition to net zero.

Question 6 - What are your views on the proposed lenses from which to explore the economic, cultural and environmental impacts and opportunities arising from transition?

You may wish to consider:

- Impact and Opportunities across our Emission Sectors over time;
- Impacts and Opportunities on Employment and Business;
- Impacts and Opportunities for different groups of Society;
- Impacts and Opportunities in different parts of Wales.
- Any additional factors you think should be considered

¹⁶ ONS Low Carbon and Renewable Energy economy (LCREE) survey 2020 - <u>Low carbon</u> and renewable energy economy, UK - Office for National Statistics (ons.gov.uk)

Part 3 – Mobilising Stakeholders and Coordinating our Collective Response

We need to work with stakeholders in planning and coordinating effective and sustained changes needed to transition fairly to Net Zero

Scope

The earlier we upscale active collaboration for the transition to net zero, the better placed we will be to minimise the threats and maximise the opportunities. Stakeholders and partners, including social partners must mobilise to create and maintain an inclusive planning process.

Those that could be affected by the transition including, but not limited to, marginalised groups and communities, should be given the chance to influence how risks and opportunities are defined, the vision for transition, the planning and the strategies needed for transition.

Solution

The Call for Evidence highlighted collaboration between public sector, businesses, workers, unions and communities is a fundamental principle for all decision-making regarding the Just Transition. Citizen participation and procedural justice in the transition to Net Zero is seen as a crucial element in making the transition just and fair.

It is important to create dialogue among stakeholders in order to initiate the transition process. The changes to transition will impact on organisations, workforces, local economies and communities. We must therefore ensure clear process that enables those impacted to engage in dialogue.

The approach to involvement to enable the participation of citizens must be established at the earliest possible stage. Involvement should continue throughout the design, implementation and evaluation processes to enable the identification of issues and potential solutions throughout. Early dialogue among stakeholders can provide the momentum for more detailed transition planning.

This approach mirrors the requirements of the WFGA. However, there are many stakeholders and partners not named in the WFGA. Many more stakeholders across multiple areas of social, economic, cultural and environmental policy can be key partners in leading the transition to net zero. The roles and responsibilities for planning and implementing a just transition to Net Zero must also be defined.

Implementation

The main focus of this Framework is describing Welsh Government's approach to a just transition. We also set out a series of actions to support that approach (Annex) and need for stakeholders and partners to adopt comparable approaches. As described above, a successful and Just Transition will be driven at multiple levels, in multiple sectors and all geographies. A toolkit is provided to support and guide stakeholders to undertake their own transition planning.

Leadership, Collaboration and Roles and Responsibilities

Leadership and collaborations between governments, industry and business representatives, academic institutions and communities will be needed to achieve a successful and just transition. Just Transition will need to happen at multiple levels (see Figure 3).

The Welsh Government's role in Just Transition

The Welsh Government will lead in developing an approach to a just transition. We will continue to build the evidence base and capacity in order to plan and implement change. We will ensure just transition is integrated effectively into our national climate policies. In doing so, we will aim to co-design and co-deliver with those who stand to be most significantly impacted by the transition to net zero.

The Welsh Government will use evidence from relevant sources to support our approach, working with partners to address gaps in evidence, where such evidence would have a material impact on decision making.

• The role of UK Government

Many of the most powerful levers to deliver a just transition, such as powers over welfare and trade, sit with the UK Government. The Welsh Government will seek to work with the UK Government on reserved matters so that powers at its disposal are deployed effectively in Wales.

Team Wales

This Framework provides the foundations for a collaborative approach to delivery involving a broad network of Team Wales¹⁷ partners (comprising other public service bodies, businesses and voluntary sector organisations across Wales). Team Wales partners should look for opportunities to form collaborations to address just transition within their plans and climate actions.

The Team Wales approach is where Welsh Government, public bodies, businesses and communities across Wales work together to tackle the shared challenges of the climate and nature emergency.

Within individual organisations

A strong partnership between business, unions, workforce and local communities will be vital for the success of just transition. This means that building knowledge and capacity will be required across all areas of Welsh society, including at the level of individual organisations of all kinds: businesses, local authorities, public bodies and third sector organisations. Organisations should use this framework to instigate or update plans to ensure Just Transition

Communities

Active engagement must continue with communities, voluntary sector and community networks to explore initiatives and opportunities for capacity building around just transition. Support is also needed for people in the community who want to take action to help their community make changes.

¹⁷ Climate Change Welsh Government Engagement Approach 2022-2026

Academia and educators

Universities and other research organisations and institutions can play crucial roles in transition planning. They can be key partners in the analyses needed for transition planning (see **Part** 2) and in near-term reskilling and retraining.

Cooperation between governments, industry representatives, and academic institutions will likely be needed to align the education and research sectors with the needs of a just transition.

Question 7 - What are your views on the proposed leadership, collaboration and roles and responsibilities for delivering a Just Transition?

You may wish to consider:

- The Welsh Government;
- The UK Government;
- Team Wales;
- Within individual organisations;
- · Communities;
- · Academia and educators;
- Any other stakeholders you feel should be included.

Public Engagement

The Welsh Government's Public Engagement Strategy¹⁸ sets out a framework for the Welsh Government and its partners to work together to support and engage the people and communities of Wales in action on the climate and nature emergencies. In presenting the evidence, it conveys the importance of ensuring that fairness is embedded in the approach for the people of Wales and future generations. This will be the foundation for how we involve the public in the decisions that affect them around just transition.

The Involvement of workers, communities and business is critical to ensure that just transition planning and policies are relevant and effective.

Question 8 - How do you think the people and communities of Wales can be most effectively involved in planning for a just transition?

You may wish to consider:

- Different approaches to involvement the Welsh Government could be considering;
- How you might involve individuals in your business/community/organisation to ensure planning is relevant and effective, and what information might help you to do this.

¹⁸ Climate Action Wales – Public Engagement Strategy 2023-26 (gov.wales)

Next Steps

This consultation is the next step in developing our approach and builds on our Call for Evidence¹⁹ published in December 2022. It seeks your views on a proposed Just Transition Framework for Wales.

The aim is to publish a final Framework in 2024 which will help Welsh Government and partners in planning and delivering climate action. It will also inform and help develop our next Net Zero Wales Plan, which will be published in 2026.

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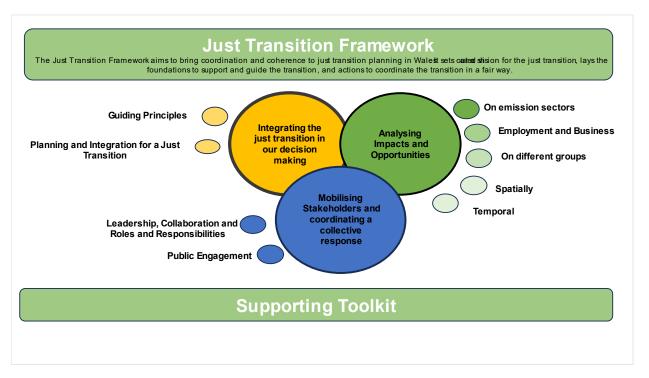
¹⁹ Just Transition to Net Zero Wales | GOV.WALES

Part 4 - Tool Kit

Just Transition Toolkit

The purpose of this toolkit is to support practitioners in planning for Just Transition in Wales. It should be used in conjunction with the guiding principles which do not replace the well-being goal descriptions but are additional to help Just Transition planning only (*please note these are being consulted on*). The Toolkit will be adaptive and updated as more case studies and good practice is identified.

The toolkit focuses on three main areas of the framework



The following section provides an expanded description of the guiding principles to assist and guide stakeholders. These have been developed from responses to the Call for Evidence.

Well-being Goals	Just Transition Guiding Principles	Description
A Prosperous Wales An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.	1. Invest in decarbonisation action and plans and invest in education and new skills to support transition to Net Zero	 Avoid new investments linked to high-carbon assets or activities. That is, do not create further carbon entanglement, or set the stage for stranded assets. Support programmes should not enhance the dependency of workers – or of local, regional, and national economies and political regimes – on fossil fuel-based economic activities. Assess the emissions associated with your assets and activities.
	2. Build the Evidence Base – assess the short, mid and long term, geographical and sectoral contexts.	 Make an initial assessment of the impacts and the actions required to transition fairly for Net Zero over the short, mid and long term and update existing plans or create new plans incorporating social, economic, cultural contexts Emission reduction plans should include the scope 2 & 3 emissions where appropriate Recognising the powerful role data and evidence has in helping to reduce development risk, cut costs, and drive continued improvements in operational performance. This will help those involved to make informed, evidence-based decisions and to address spatial consenting and planning challenges.
	3. Ensure fairness and equity is embedded in decisions for all including workers business, including small business.	In planning and incorporating information and investment for Net Zero think about whether everybody is able to access it in an equitable way. Undertake a stakeholder analysis to identify and prioritise the key actors to ensure equity is planned in.

A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).	4. Ensure that transition to Net Zero does not harm but enhances the natural environment.	Use of Environmental Assessments e.g. Strategic Environmental Assessments, Environmental Impact Assessment and Habitats Regulations Assessments to understand impacts and opportunities on the natural environment.
A Healthier Wales: A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.	5. Take into account the health of people and communities as part of planning for measures and actions to achieve Net Zero.	 Undertake a Health Impact Assessment on all climate change plans and policies to understand any adverse effect and also to improve health equity. HIAs involve the application of multilevel frameworks of the determinants of health, wellbeing and equity to policies and proposals in a process of active engagement with affected communities, relevant stakeholders, and policy and decision makers.
A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).	 6. Actively promote equality, children's and human rights and prevent new inequalities from arising while furthering wider equality and human rights across all protected characteristics. 7. Ensure fair distribution of costs and benefits: address existing economic and spatial social inequality by sharing the benefits of 	 Public Sector bodies to consider decarbonisation measures in fulfilling their requirement under the socio-economic duty. Ensure workplaces are representative of society and communities. Adopt Children's Right's Approach to ensure the rights of children and young people are protected and they are included in the decision-making processes locally, regionally and nationally. See Children's rights in Wales GOV.WALES This is included within the Socio-economic Duty of the Equality Act 2010 and supported by the Children's Commissioner's office Children's Rights - Children's Commissioner for Wales (childcomwales.org.uk). Including this aspect in an Integrated Equality Impact Assessment process ensures due thought and action is applied.

	climate action widely, while ensuring that the costs are distributed on the basis of ability to pay.	
A globally responsible Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well- being.	8. Take into account global impact of the transition and prevent offshoring emissions and avoid deforestation.	 Analyse the needs of Welsh society and the global community in the development of your plan and/or actions to achieve Net Zero. This includes assessing the contribution of securing human rights, women's rights, and workers' rights at a national and international level, and address the environmental and social impact that Wales is having domestically and overseas.
A Wales of vibrant culture and thriving Welsh language	9. Where decarbonisation supports and contributes positively to the culture of Wales and the Welsh language, enabling positive health outcomes, personal wellbeing, community cohesion and economic growth especially in rural communities.	Consider the impact on rural communities in your planning for actions to meet Net Zero ensuring involvement as appropriate to ensure fairness in decisions.
A Wales of cohesive communities: Attractive, viable, safe and well-connected communities.	10. At the earliest possible stage -Identify and involve and prioritise all those affected by transition.	 See also Part 3 of this document. Establish involvement approaches at earliest possible stage. Undertake a stakeholder analysis to identify and prioritise those affected. Continue to work with people at earlier stages, such as helping to identify issues and potential solutions, and being supported to remain involved right throughout design, implementation and evaluation processes.

Integrating the just transition in our decision making

Planning is best facilitated when there is a shared understanding among stakeholders of the transition.

Overall, the transition planning effort needs to be guided – **the Just Transition principles** will assist and support you in this.

It is also crucial to understand the wider socioeconomic context in which a transition is taking place. This influences who may be affected by change and how, who has the power to act, the interests and norms that might guide different groups, as well as the policy and institutional context. Understanding the context also means understanding why particular groups may be more vulnerable to change than others, so that interventions can be designed to reduce inequality and empower these groups.

Links to guidance and tools supporting decision making:

For example

- Ethical employment in supply chains: code of practice | GOV.WALES?
- Guide to Fair Work

Case Studies

Links to Case Studies

Analysing Impacts and Opportunities

As identified in the guiding principles, various types of research, data and analysis are needed to inform planning for just transitions. The potential risks and opportunities arising from a transition need to be understood.

These include the possible impacts on employment, social conditions, economic conditions, cultural impacts and the natural environment. You should also understand existing social and economic contexts to identify where climate actions can contribute to addressing existing inequalities.

It important to understand how risks and opportunities will be distributed. Some people will experience greater loss or hardship than others, or will have less capacity to cope with changes because of their circumstances. This could for instance be gender, age, ethnicity, employment status, disability, or other factors.

Links to guidance and tools on Evidence

For Example

DataMapWales

The Climate Change Committee Balanced Pathway

Case Studies

Links to Case Studies

Mobilising Stakeholders and coordinating a collective response

The guiding principles highlight that involving a socially inclusive process is crucial for a just transition. Using tools and methods, careful identification of relevant stakeholders should be undertaken. The procedures we use must have fairness at the core of this work.

Establish involvement procedures at earliest possible stage. Undertake a stakeholder analysis to identify and prioritise those affected. Continue to work with people at earlier stages, such as helping to identify issues and potential solutions, and being supported to remain involved right throughout design, implementation and evaluation processes.

Ensure as appropriate that business, public sector, trade unions and the third sector are involved in shaping actions to reach Net Zero. Ensure involvement of trusted civil society organisations in early planning and decision making in enhancing procedural legitimacy and hence trust in decision making. Involve the general public so they have equal opportunities to participate in climate action and recognising the differences between sociocultural values and positions of people and groups, and their specific needs and vulnerabilities.

Also consider future generations, including and not limited to future workers, communities, young people and business ensuring fairness of opportunities and support. Use diversity and inclusion frameworks to ensure no one is excluded from a just transition.

Links to guidance and tools on:

- Stakeholder Identification
- Stakeholder Involvement
- Collaboration and Resources

For example

• National Principles of Public Engagement

Case Studies

Links to Case Studies

Question 9 What are your views on the proposed toolkit? You may wish to consider:

- How you/your organisation might utilise a toolkit;
- Any additional elements which could be included to help planning for a just transition;
- How the toolkit can be designed to be of maximum value to different types of stakeholders planning for a just transition.
- Any online tools and case studies that you feel could be part of the toolkit.

Annex - Actions

Integrating the just transition in our decision making		
Actions	Timing	
Develop a toolkit with stakeholders through consultation and publish for practitioners to use. The Toolkit will incorporate guiding principles to support best practice for practitioners to follow.	Published with final framework in 2024	
This toolkit will evolve over time as the evidence base grows.	_	
Just Transition needs to happen at every level from Strategic, sectoral, organisational and community to individual policy level.		
At a Policy level Welsh Government will update its decision- making tools such as the Integrated Impact Assessment to ensure Just Transition is reflected.	From 2023	
We also expect the wider public sector and businesses of all sizes to integrate a Just Transition into decision-making using the toolkit provided to ensure consistency of approach.		
Work with the social partnerships to fully understand the equality challenges and focus on the work we need to do collectively, to achieve a fair and equitable labour market in Wales. We will undertake extensive engagement from key equality groups across Wales to inform the development of a Skills Just Transition Action Plan.	Ongoing	
There is a strong need to integrate net zero skills across all Welsh Government policies to ensure a highly skilled workforce now in the future to meet the economy needs. We will continue to drive this approach through the delivery of the Net Zero Skills Action Plan.		
We will continue to strengthen our understanding of fairness in climate policy through research and evidence. Fairness and equality is at the heart of our transition. We will identify the evidence and insight required to ensure equality and justice is central to the decisions being made to decarbonise our society. We will also look to other to develop their understanding as they	Ongoing	
are planning their own transition. The Welsh Government will ensure Just Transition is embedded in the next Net Zero Wales Plan using the guiding principles in this document.	Ongoing	

The Welsh Government will also build just transition into forthcoming policies, action plans and strategies starting in carbon budget 2.	
We will also look to others to integrate considerations of just transition planning in their key strategic, business and policy approaches.	

Building Our Evidence Base – Analysing Impacts and opportunities		
Action	Timing	
We will continue to identify the impacts and opportunities across our emission sectors in order to prioritise the actions to ensure a just transition.		
We will do this by building on the Call for evidence to enable the sharing of knowledge and data with stakeholders. We will signpost evidence for stakeholders via our Toolkit and also identify evidence gaps.	2024-25	
We also expect the wider public sector and businesses of to start building the evidence base in their areas to understand the key risks and opportunities.		
We have already started work in this area through the Net Zero Skills Action Plan ²⁰ and the Net Zero Skills Consultation, which will help us to gain an understanding of the current skills position in Wales, including what skills are needed in the short, medium and long term and how we will achieve this. We will develop public sector skill Roadmaps in 2024 to help us plan effectively the skills requirements to support the transition.	Ongoing	
We will explore approaches to understanding the vulnerability of different parts of our society and economy to the changes required to meet Net Zero.		
Stakeholders planning just transition and developing mitigation measures need to understand impacts and opportunities in their area or sector.	Ongoing	

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²⁰ Net zero skills action plan | GOV.WALES

We will work with international partners to identify and gather evidence on a range of actions to implement just transition. Just Transition needs to happen at every level, within business, public sector and at community level. This will include international policy measures that will achieve both climate and social benefits. We will share with stakeholders via our Toolkit to share knowledge.	Ongoing
We will gather evidence on how we communicate just transition with the public to ensure their fair and equitable involvement. We will build a shared understanding of what a just transition looks and feels like. An understanding of how to communicate our approach to just transition in a way that resonates with various audiences will be key to ensure long term support for just transition plans.	Ongoing
Our overarching approach for monitoring and evaluation will be explored over the period up to the publication of the next net zero plan. The approach will be one that can be that can be nested with the wider framework for monitoring climate change and achieving the 7 well-being goals. We set out in Net Zero Wales in 2021 how the actions contained	
in that Plan contributed to the 10 well-being objectives that the government will use to maximise its contribution to Wales' seven long-term well-being goals and the steps we will take to deliver them over this government term (2021 – 2025). This Framework contributes to delivering Policy 1 of that Plan and therefore Welsh Government's well-being objectives.	2024- 2026
We also look to other to consider how they will measure their just transition considerations.	

Mobilising Stakeholders and coordinating a collective response		
Action	Timing	
We will work with stakeholders to develop a toolkit for others to enable others to prepare for the transition.		
We expect the wider public sector and businesses to start using the toolkit, with their trade unions and/or workers, to help prepare for the future.	2024	

We will explore options to support effective social dialogue between Trade Unions, Business and Government ensuring workers understand the possibilities, risks, and benefits for a just transition	From 2023
Work with International Partners to share knowledge and best practice.	From 2023
Work with UK Government and devolved Administrations on matters where responsibility for actions and measures that affect Wales lie with UK Government.	Ongoing
We will work with public sector colleagues using existing structures to share knowledge on planning and implementing a Just Transition.	From 2023
The Welsh Government will undertake a review into the extent to which deliberative public engagement on the climate and nature emergencies is already being undertaken across Wales (and by whom). This will include consideration of the different groups and parts of society who are participating in such engagement in order to further inform our approach to fair and equitable involvement in the just transition.	
The Welsh Government will use the findings from this review to consider solutions for a more joined-up approach to public engagement, including on the just transition, as part of the climate and nature emergencies across Wales.	
We will develop a range of communication products and approaches to build up knowledge and capability on Just Transition for stakeholders to use and support involvement of the general public.	

Questions

Question 1: What are your views on the proposed Vision for a Fairer, Greener Wales by 2050?

You may wish to consider:

- Whether the vision as proposed reflects your view on what a fairer, greener Wales should look like;
- Any additional factors you feel should be included in the vision.

Question 2: What are your views on our proposed approach to just transition in Wales?

You may wish to consider:

- The use of the WFGA as a guiding framework;
- The types of justice included, and whether there are other types of justice or approaches that it could reflect;
- Any additional factors you feel should be included in the approach.

Question 3: What are your views on the overarching structure of the proposed framework?

You may wish to consider:

- Appropriateness of the structure for communicating our approach and actions for a just transition;
- Any additional elements you feel should be included.

Question 4: What are your views on the guiding principles?

You may wish to consider:

- How effectively the principles will integrate the just transition into decision making;
- Whether these principles would be of use to organisations outside of the Welsh Government;
- How organisations might use or apply these principles to integrate the Just Transition into decision making;
- Whether the principles have any gaps or omissions;
- The link between the principles and the WFGA.

Question 5: What are your views on the proposed approach to planning for different types of Transition?

You may wish to consider:

• The different types of transition outlined;

- What processes should be used to integrate just transition into decision making;
- Additional contexts or situations where planning for a just transition will be required;
- Any additional factors you feel the Welsh Government should be including in the approach.

Question 6: What are your views on the proposed lenses from which to explore the economic, cultural and environmental impacts and opportunities arising from transition?

You may wish to consider:

- Impact and Opportunities across our Emission Sectors over time;
- Impacts and Opportunities on Employment and Business;
- Impacts and Opportunities for different groups of society;
- Impacts and Opportunities in different parts of Wales;
- Any additional factors you think should be considered.

Question 7: What are your views on the proposed leadership, collaboration and roles and responsibilities for delivering a Just Transition?

You may wish to consider:

- The Welsh Government;
- The UK Government:
- Team Wales:
- · Within individual organisations;
- Communities:
- Academia and educators:
- Any other stakeholders you feel should be included.

Question 8: How do you think the people and communities of Wales can be most effectively involved in planning for a just transition?

You may wish to consider:

- Different approaches to involvement the Welsh Government could be considering;
- How you might involve individuals in your business/community/organisation to ensure planning is relevant and effective, and what information might help you to do this.

Question 9: What are your views on the proposed toolkit?

You may wish to consider:

- How you/your organisation might utilise a toolkit;
- Any additional elements which could be included to help planning for a just transition;
- How the toolkit can be designed to be of maximum value to different types of stakeholders planning for a just transition.
- Any online tools and case studies that you feel could be part of the toolkit.

Question 10: What, in your opinion, would be the likely effects of the proposed Just Transition Framework on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

- Do you think that there are opportunities to promote any positive effects?
- Do you think that there are opportunities to mitigate any adverse effects?

Question 11: In your opinion, could the proposed Just Transition Framework be formulated or changed so as to:

- Have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or
- Mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

Question 12: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.