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CITIZEN PARTICIPATION IN THE JUST TRANSITION OF STARA ZAGORA COAL REGION

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CITIZEN PARTICIPATION IN THE JUST TRANSITION OF STARA ZAGORA COAL REGION

ABSTRACT

This study examines the extent and forms of citizen participation in the planning and implementation of Territorial Just Transition Plans (TJTPs) in Bulgaria during 2022–2025. It applies the concepts of just transition and citizen participation to the contested process of the EU–driven decarbonisation in Bulgaria's main coal mining region. The analysis focuses on the case of Stara Zagora, a region recognised by the Just Transition Mechanism (JTM) and marked by public backlash and limited consensus on transition strategies. The research is based on a desk review of the EU and national policy documents, scholarly literature, and reports from NGOs and the media. An adapted analytical framework, grounded in good governance criteria for stakeholder engagement, is used to assess participation levels. Findings show that although formal structures for citizen involvement exist, their effectiveness and substantive influence remain limited. Civil society engagement scores low, indicating that consultation mechanisms are present but have minimal impact on decision–making. While a permanent consultation body – the Just Transition Subcommittee (JTS) – is established, its role remains advisory, limiting direct influence on implementation. Participation during both planning and implementation phases is largely formalised but restricted, with concerns about transparency and limited adherence to the partnership principle. The study concludes that participation in Stara Zagora falls short of the EU procedural justice standards, particularly regarding equal power and inclusive implementation. It recommends strengthening citizen participation through co–decisional rights, improved transparency, and more balanced institutional arrangements.

Keywords: just transition; citizen participation; Territorial Just Transition Plans (TJTPs); coal regions; governance and stakeholder engagement.

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1. INTRODUCTION

The European Green Deal (EGD) (European Commission, 2019a) represents the European Union's (EU) overarching strategy to achieve climate neutrality by 2050, outlining an ambitious roadmap for transforming the EU's economy into a sustainable, resource–efficient, and competitive system. Central to this vision is the principle of just transition, which seeks to ensure that the social, economic, and regional implications of decarbonisation are addressed in an equitable manner.

Recognising that the shift towards a low–carbon economy will not affect all regions and sectors equally, the EU established the Just Transition Mechanism (JTM) (European Commission, 2019b) as a key financial instrument to support territories and workers most exposed to structural change from a fossil–fuel–based energy production to a more sustainable economy. This mechanism provides targeted investments to diversify regional economies, promote reskilling and upskilling, and strengthen social cohesion based on their Territorial Just Transition Plans (TJTPs) (European Commission, 2021), taking into account regional characteristics, strategies and needs.

These strategic documents have set important priorities for regions in transition, however, there remains considerable ambiguity regarding which specific socio–economic and environmental impacts these plans are intended to address, as well as the extent to which they can effectively promote a genuinely just and inclusive transition. The engagement of citizens and relevant stakeholders is essential throughout all phases of planning and implementing transition strategies (World Bank, 2020). Such engagement should be maintained consistently over time and underpinned by effective leadership and facilitation mechanisms to ensure continuity and legitimacy. Accordingly, social dialogue and active stakeholder participation constitute fundamental components of governance frameworks in coal–dependent regions undergoing structural transformation, as they foster trust, inclusivity, and shared ownership of the transition process.

The Stara Zagora region is recognised as one of the most coal–intensive regions in the EU and is eligible for support under the JTM. It is known as the energy heart of Bulgaria, with the Maritsa area hosting the largest coal mining and coal–fired power plants in the country. The Maritsa Iztok (Maritsa–East) energy complex encompasses three lignite pit mines as well as three coal power plants and one briquette plant, which employ more than 13,000 people (European Commission, 2024).

The chapter is structured as follows. The present section introduces the topic. Section 2 reviews the literature on just transition, citizen participation, and the legal and methodological frameworks that support it. Section 3 explains the research approach, methodology, and case study selection. Section 4 presents and discusses the findings on the planning and implementation of the Territorial Just Transition Plan for the Stara Zagora region. Section 5 assesses the findings against the research framework, while Section 6 presents the conclusions and policy recommendations for strengthening citizen participation in the just transition. Finally, Section 7 discusses the broader implications of the research.

2. LITERATURE REVIEW

Two key concepts primarily inform this research journey – the conceptualisation of just transition, on the one hand, and of citizen participation expanded by the notion of public participation, on the other. Citizen engagement and public consultation that enhance the active and systemic inclusion of all relevant stakeholders and the wide representation of the general public are crucial conditions for the procedural justice of the just energy transition. Therefore, participation is not just an ancillary component but the vehicle that delivers justice and a fair governance process. Without the instrumental benefits of citizen knowledge and the normative benefits of inclusiveness, the just aspect of the transition fails in practice. The literature warns that restricted participation ("tokenism") leads to disempowerment and moral resistance, whereas meaningful participation fosters inclusiveness, shared ownership and trust (Arnstein, 1969).

2.1 THE CONCEPT OF JUST TRANSITION

The notion of transition can be conceptualised as a fundamental transformation within the structures and functions of a societal system (Frantzeskaki & de Haan, 2009). Given that such transitions entail profound, long–term, and systemic changes across social, economic, and environmental domains, the active engagement of citizens is indispensable when addressing the complexity inherent in these processes. According to García–García et al. (2020), a just energy transition constitutes a long–term technological and socio–economic transformation that reshapes the generation, distribution, storage, and consumption of energy, while ensuring that essential societal functions are achieved through decarbonised and renewable systems that uphold social justice, equity, and welfare. This conceptualisation underscores the holistic character of transition processes, which extend far beyond the technical reconfiguration of the energy infrastructure (McCauley & Heffron, 2018). Within this framework, just transitions serve as catalysts for transformative change in coal–dependent regions, supported by diverse governance capacities. The shift towards green energy is thus conceptualised as a multilevel, multidimensional, and long–term process, producing wide–ranging economic, environmental, and social implications (Loorbach et al., 2017).

The EU has applied an open–ended definition of what constitutes a just transition, calling for the transition to be conducted fairly and inclusively in order to ensure that no person or region is left behind (European Commission, 2019b). At the centre of this transition lies the phase–out of fossil–fuel–based energy production – an important component of the EU's aim to become a climate–neutral economy by 2050, reflected in the EGD and JTM.

2.2 CITIZEN PARTICIPATION

The concept of citizen participation has been widely discussed in the literature, reflecting differing perspectives on its meaning and purpose. Arnstein (1969) conceptualises participation as a redistribution of power, enabling previously excluded citizens to engage meaningfully in decision–making processes. Similarly, Roberts (2004) defines it as the sharing of power between government and society in shaping decisions that affect communities. Callahan (2007) interprets citizen participation as the interaction between citizens and public administrators, while the OECD (2022) offers a broader definition, describing it as encompassing all forms of stakeholder involvement – citizens and affected parties alike – across all stages of public service design and delivery. Despite differences in emphasis, these definitions converge on the notion that citizen participation directly influences both policy formulation and implementation, prioritising direct over indirect participation and emphasising active citizen engagement in decision–making processes.

Scholars have identified multiple dimensions of citizen involvement in policymaking, including instrumental, normative, and transformative benefits (Moodie et al., 2022). Instrumental benefits arise when citizens contribute knowledge and ideas that enhance policy quality; normative benefits relate to inclusiveness and fairness; and transformative benefits concern learning, awareness, and attitudinal change. These benefits correspond to four primary purposes of citizen engagement: knowledge generation, improved policy efficiency, empowerment and capacity building, and strengthened legitimacy and democracy. From an administrative standpoint, participation can facilitate conflict resolution and build institutional trust (Callahan, 2007), while practitioners often emphasise its capacity to yield locally tailored solutions (Bryson et al., 2013). Within co–creation and co–production contexts, participation is further linked to social innovation (Voorberg et al., 2015). In the field of environmental governance, Beierle (2005) highlights additional outcomes such as enhanced environmental literacy, evolving public values, and conflict management. Likewise, Bickerstaff & Walker (2005) distinguish between the developmental, educative, therapeutic, and integrative outcomes of direct participation and the communicative and power–balancing aims of deliberative approaches.

The outcomes of participatory policymaking, however, are not universally positive. Studies note that participatory processes can often fall short of expectations (Denwood et al., 2023) and may even produce adverse effects. Potential drawbacks include the overreliance on intermediaries, the disempowerment or tokenisation of participants, the reinforcement of existing social hierarchies, and the emergence of horizontal conflicts (Gaventa & Barrett, 2012). Broader dilemmas also persist, such as issues of scale, inclusivity, expertise asymmetries, time constraints, and the tension between individual participation and collective welfare. Bussu et al. (2022) emphasise the difficulty of reconciling the often–divergent expectations of citizens, civil society organisations, political parties, and public officials, suggesting that participatory attitudes and behaviours are as critical as institutional mechanisms. Embedding participation sustainably, therefore, requires coalition–building across institutional and

activist domains, ongoing political commitment, adaptive decision–making practices, capacity building, and incentives for experimentation and leadership (Escobar, 2011). Notably, research on participation has tended to privilege methodological innovation over an analysis of its long–term institutional effects, leaving significant gaps in understanding how participatory practices reshape democratic governance structures (Bickerstaff & Walker, 2005).

Citizen participation in environmental matters has been reinforced in the last 30 years by the notion of public participation in various international and national legal instruments. The 1992 Rio Declaration on Environment and Development (United Nations, 1992) promoted it in its Principle 10. The United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision–Making and Access to Justice in Environmental Matters (1998) defines it as one of the pillars of environmental democracy. The Convention links environmental rights and human rights and emphasises the interactions between the public and public authorities to integrate environmental protection into decision–making. All EU Member States and the EU as a supranational entity are parties to the Aarhus Convention that applies to public participation concerning plans, programmes and policies relating to the environment, including plans such as the TJTPs. According to the Convention's Article 7, each Party shall make appropriate practical and/or other provisions for the public to participate during the preparation of plans and programmes relating to the environment, within a transparent and fair framework, having provided the necessary information to the public.

Within the context of the energy transition, broad–based and sustained citizen/public participation constitutes a prerequisite for the successful governance of this multifaceted transformation. The empowerment of citizens to steer government environmental decision–making provides a critical legal structure for advancing progress in addressing climate change (Akerboom & Craig, 2022). The multi–layered nature of energy governance necessitates the inclusion of diverse actors to ensure that transition processes are perceived as legitimate and socially acceptable (Matern et al., 2025). Consequently, citizens' engagement should be understood not merely as an ancillary component of governance but as an iterative and adaptive process that evolves alongside the transition itself. Continuous involvement throughout the formulation, implementation, and evaluation of transition strategies is essential and must be supported by strong leadership and effective facilitation mechanisms. In this regard, social dialogue and stakeholder participation emerge as integral elements of governance frameworks in coal–dependent regions undergoing structural transformation.

Citizen participation mechanisms in the environmental field in Bulgaria have been the subject of an analysis of the involvement of citizens and NGOs in the state and local consultative bodies. The research identified some prevailing negative features of existing mechanisms, such as the restriction of voting rights and a predominant number of representatives of state institutions compared to those of citizens, businesses, and academia, which renders citizen participation meaningless in voting by majority vote (Belev & Antonov, 2016).

Recent research has addressed the modalities of citizen participation in the just energy transition in Bulgaria and found them limited (Topaloglou et al., 2024). The diffusion of information appears to be minimal, and the stakeholders are not regularly consulted, leading to missed opportunities for gathering diverse perspectives and feedback. The level of involvement in decision–making processes also indicates possible barriers to a more active role of civil society in the decision–making process.

2.3 FRAMEWORK FOR CITIZEN PARTICIPATION

This research framework on citizen participation in just transition in the Stara Zagora region has been informed first by its legal and governance aspects: the EU and national legal requirements for citizen participation and the EU methodological recommendations. The relevant provisions and guidance for citizen participation are reviewed with references to the role of civil society and its organisations (NGOs) in mind.

EU and national legal requirements for citizen participation

The Regulation (EU) 2021/1060 (EPCEU, 2021b) lays down the common provisions for coordinated and harmonised implementation of Union Funds implemented under shared management, e.g., the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund and the Just Transition Fund. Already in the Preamble (Recital 14), it introduces the principle of partnership as a key feature in the implementation of the Funds, building on a multi–level governance approach and ensuring the involvement of regional, local, urban and other public authorities, civil society, economic and social partners and, where appropriate, research organisations and universities. Civil Society Organisations (CSOs[1]) are recognised by the Regulation as an equal partner in the implementation of territorial just transition plans supported by the Just Transition Fund (JTF). According to Article 8 Partnership and Multi–level Governance for each programme, each Member State is required to organise and implement a comprehensive partnership, and that partnership shall include as partners relevant bodies representing civil society, such as environmental partners and non–governmental organisations.

The principle of partnership is reinforced in the Regulation (EU) 2021/1056 (EPCEU, 2021a) establishing the Just Transition Fund, where it is identified in Annex II as one of the governance mechanisms of the TJTP. A partnership should be operationalised by arrangements for the involvement of partners in the preparation, implementation, monitoring and evaluation of TJTP and by the outcome of public consultation.

In Bulgaria, the legal framework for citizen participation in governance is first and foremost established by the Constitution of the Republic of Bulgaria (1991, 2024). The Bulgarian Constitution provides the fundamental principles governing citizens' involvement in public decision–making. The right of citizens to obtain information is

[1] Some sources use the term CSO, others – NGO – to refer to organisations of civil society. In this study, we use them interchangeably.

also guaranteed by Article 41 of the Constitution of the Republic of Bulgaria (2024). While the Constitution establishes the general constitutional framework, the specific modalities and procedures for citizen participation in local governance are further elaborated in a range of legislative acts.

Issues of local significance may be addressed through mechanisms regulated by the Law on the Direct Participation of Citizens in State Power and Local Self–Government (2009/2022) and the Election Code (2014/2024). The Law on the Direct Participation of Citizens in State Power and Local Self–Government (2009/2022) regulates the conditions, organisation, and procedures for the direct involvement of Bulgarian citizens in the exercise of state and local authority. According to this law, direct participation may take several forms, including referendums, citizens' initiatives, general assemblies of the population, and the European Citizens' Initiative as defined in Article 2(1) of Regulation (EU) No. 211/2011 (EPCEU, 2011). In addition, the Law on Normative Acts (1973, amended 2024) aims to improve the process of drafting, adopting, and implementing normative acts, including local regulations that govern aspects of citizen participation in local governance. Furthermore, transparency and access to information constitute an important prerequisite for effective civic participation, including in climate and energy policy matters. The Access to Public Information Act (2000, amended 2023) regulates the conditions and procedures under which public information is provided.

In terms of European policies, the national Law on the Management of European Funds (Republic of Bulgaria, 2015, amended 2026) sets out in Articles 14 and 15 the conditions for monitoring the implementation of EU funding programmes, including that of the JTF. Among these conditions is the representation of various stakeholders in relation to the just transition. The implementation of the programmes is monitored by designated regional committees. The committees consist of a chairperson, members and observers with the right to an advisory vote. The committees adopt internal rules of procedure and a code of conduct. NGOs as representatives of civil society may be members of the monitoring committees. Some of the key responsibilities of the monitoring committee include approving the methodology and criteria used for the selection of projects; endorsing indicative annual work programmes; reviewing the implementation and monitoring the progress in the implementation of the programme and the progress towards achieving the intermediate goals and target values; and approving the final report on the quality of the implementation of the programmes financed by the JTF. Other relevant national acts related to participation in environmental policies include the Law on the Protection of the Environment (2002, amended 2026), Law on Spatial Planning (2001, amended 2025), and the Ordinance on the Conditions and Procedures for Conducting an Environmental Assessment of Plans and Programmes (2004, amended 2020).

EU methodological recommendations for citizen participation

With respect to just and green transition, two methodological toolkits: the Governance of Transitions Toolkit (European Commission, Directorate–General for Energy, 2025a) and the Transition Strategies Toolkit (European Commission,

Directorate–General for Energy, 2025b) developed by the European Commission embed citizen participation throughout transition governance strategies, both explicitly and through implied design principles related to inclusivity, ownership and legitimacy, transparency, engagement and feedback.

The Governance of Transitions Toolkit (European Commission, Directorate–General for Energy, 2025a) in particular emphasises that coal+ transitions require the representation of a broad range of stakeholders, including CSOs, that can amplify citizen voices. It explicitly supports open citizen invitations without limiting criteria on number or expertise, illustrated by a regional example where 60 citizens volunteered to participate in repeated consultation meetings. Participatory processes are framed as essential for building the ownership of transition strategies and for strengthening legitimacy. Governance structures are expected to reflect the views of different actors, with representatives recognised as legitimate by broader communities.

Stakeholder and citizen engagement must be understood as a continuous process, starting early and extending beyond strategy launch into implementation and evaluation (Stefańczyk et al., 2023). Long–term engagement requires leadership and active facilitation. As defined in the toolkit, effective participation depends on all stakeholders, including citizens, receiving the same information, on time, and concurrently to prevent epistemic and procedural power imbalances. The toolkit echoes deliberative–democratic criteria for equal access to decision inputs.

From the Governance of Transitions Toolkit (European Commission, Directorate–General for Energy, 2025a), we can extrapolate seven operational principles designed to secure effective participation in the phases of identifying, selecting, and implementing just transition projects (Table 1).

Table 1. Core principles for effective participation in the phases of identifying, selecting and implementing just transition projects, as per the Governance of Transitions Toolkit

Source: European Commission, Directorate-General for Energy, 2025a.

PRINCIPLE	EXPLANATION
Invite openly	Publicise your intention to start planning early, and in multiple, accessible locations.
Ensure inclusiveness	Ensure all partners are included in teams implementing the just transition.
Give equal status	Give all partners equal status and equal voting rights at all stages of the transition process.
Share information	Provide all partners with the same information, on time and at the same time.
Allow feedback	Establish clear and transparent routes for feedback.
Go public	Ensure the minutes of all meetings are made public within two weeks.
Engage the community	Facilitate public engagement in the transition process and ensure the public is fully informed about it.

The Governance of Transitions Toolkit (European Commission, Directorate–General for Energy, 2025a) further reflects a strong awareness of procedural justice challenges. It recognises persistent power and knowledge asymmetries, cautioning against incumbent dominance by political–economic insiders. To mitigate these distortions, it recommends professionally facilitated deliberation and the participation of non–traditional external actors – such as artists and experts from neighbouring regions – to rebalance discursive influence and foster creative, non–path–dependent deliberation. This approach is consistent with deliberative–democratic frameworks that emphasise the intentional redistribution of communicative power to enable equitable agenda negotiation and diversify epistemic inputs.

Transparency is articulated as a foundational democratic standard. The document stipulates the public disclosure of selection criteria and decision rationales to permit the external scrutiny of strategic congruence. It also endorses publishing monitoring and evaluation outcomes to strengthen citizen ownership, enhance institutional reflexivity, and promote iterative learning. Collectively, these design principles signal a normative commitment to inclusive agenda construction, procedural fairness, and transparent implementation as prerequisites for legitimate and adaptive transition governance.

The EU Delegated Regulation 240/2014 on the European Code of Conduct on Partnership in the Framework of the European Structural and Investment Funds (European Commission, 2014) sets rules for applying the partnership principle in programmes funded by the European Structural and Investment Funds. It implements Article 5 of Regulation 1303/2013 (European Parliament & Council of the European Union, 2013) by defining how stakeholders must be involved (Table 2).

Table 2. Relevant partners for the Partnership Agreement as per Regulation 240/2014
Source: Authors' contribution.

STAKEHOLDER CATEGORY	RELEVANT PARTNERS AS PER THE REGULATION	STATUS
Public authorities	National ministries, regional/local governments, urban authorities, and bodies responsible for relevant policy areas.	Minimum mandatory inclusion
Economic & social partners	Employer organisations, trade unions, Chambers of Commerce, SME associations, sectoral bodies, and social economy actors.	Minimum mandatory inclusion
Civil society organisations (CSO)	NGOs, environmental organisations, social inclusion bodies, equality and non-discrimination advocates, and accessibility rights groups.	Mandatory when relevant
Representatives of affected populations	Organisations representing migrants, minorities, disabled persons, and marginalised or vulnerable communities.	Explicitly prioritised

Public participation is not open to individuals, but structured through official partner organisations representing collective interests. This creates a multi–actor governance model balancing public authorities, economic and social actors, and civil society. Member States must ensure partner involvement at all key stages of fund programmes, guided by representativeness, transparency, inclusiveness, timely engagement, and accountability.

Table 3. Main principles and good practices concerning the involvement of relevant partners in the preparation, reporting and monitoring of programmes

Source: Authors' contribution.

MAIN TYPE OF INVOLVEMENT	STAGE OF THE PROCESS	RELEVANT ARTICLE
Awareness of legal compliance duties for participation	Pre-engagement condition applies across the whole cycle	"Member States shall ensure that partners involved (…) are aware of their obligations related to data protection, confidentiality and conflict of interest". (Article 12)
Design and assessment of calls for proposals	Programme preparation and call evaluation	"Managing authorities shall take appropriate measures to avoid potential conflict of interest involving relevant partners in the preparation of calls for proposals or in their assessment". (Article 13)
Progress reporting, overview of partner opinions	Preparation of progress reports on the Partnership Agreement	"Member States shall involve relevant partners in the preparation of the progress reports on implementation of the Partnership Agreement (…) in particular concerning (…) the overview of the opinions given by the partners during the consultation". (Article 14)
Monitoring of programme performance	Programme implementation	"Managing authorities shall involve the partners, within the framework of the monitoring committee and their working groups, in assessing performance of the programme, including the conclusions of the performance review (…)". (Article 15)
Preparation of annual implementation reports	Programme implementation - reporting	"and in the preparation of the annual implementation reports on the programmes". (Article 15)
Evaluation governance for programmes	Evaluation stage within programme cycle	"Managing authorities shall involve relevant partners in the evaluation of programmes within the framework of monitoring committees and, where appropriate, specific working groups established (…) for this purpose". (Article 16(1))

Partners must come from defined categories, including public authorities, economic and social partners, CSOs, and organisations representing persons with disabilities. The Regulation does not set criteria for individual comments, but does set criteria for partner legitimacy and participation quality, requiring organisations to be highly representative, relevant, or significantly affected. Member States must proactively support the inclusion of groups facing barriers by providing timely information, allowing sufficient review time, offering communication channels, ensuring accessibility, and enabling the participation of vulnerable or low–capacity partners.

Chapter V of Regulation 240/2014 (European Commission, 2014) sets out binding principles regarding how Member States and Managing Authorities[2] must enable the involvement of relevant partners – the institutional channel through which the public participates, specifically during proposal calls, progress reporting, and the monitoring and evaluation of funded programmes (Table 3).

3. RESEARCH APPROACH

3.1 RESEARCH GAP, SCOPE AND AIM OF THE PRESENT CHAPTER

Despite an extensive body of scholarship on the concept and practice of just transition, comparatively little attention has been devoted to the role of citizen participation within these processes. In particular, there remains a lack of understanding regarding how and by whom public interest, priorities, and demands are articulated, negotiated, and translated into action. It is therefore useful to distinguish between general forms of public engagement with climate change, often focused on awareness, education, or consultation, and more proactive forms of civic engagement in which citizens are involved inclusively, can invoke their rights and demand accountability from other actors, especially national and local governing bodies, to act upon their responsibilities. Addressing this gap in the research requires learning from the just transition process in different coal regions, with particular governing regimes, social, environmental and economic characteristics.

This chapter contributes to narrowing the research gap by analysing the level and forms of citizen participation in just transition–related processes in the coal region of Stara Zagora, Bulgaria. The unique contribution of the study beyond prior research lies in applying a particular assessment framework to analyse the most relevant case of just transition in Bulgaria and fill the empirical gap regarding the mechanics of national decision–making bodies that govern the just transition funding. The authors specifically address one key research question: What is the extent of citizen participation in the just transition in the process of planning and implementing the TJTP in Stara Zagora?

[2] The Managing Authority (MA) for the programme is the Directorate–General for Strategic Planning and Regional Development Programmes within the Ministry of Regional Development and Public Works (MRDPW). The JTF is integrated into the Regional Development Programme (RDP) 2021–2027 as a dedicated priority (Priority 4). The primary role of the MA is to oversee the socio–economic transformation of Bulgaria's three most coal–dependent regions: Stara Zagora, Kyustendil, and Pernik (Council of Ministers of the Republic of Bulgaria, 2018).

In order to answer this main question, the research employed a desk–based literature and policy analysis of normative and strategic documents related to the just transition planning and implementation in Stara Zagora, as well as civil society organisations, governmental and media reports, as explained further in the methodology section below.

3.2 METHODOLOGY

The data collection for this study of citizen participation in the just transition is based on desktop research of the normative, strategic and institutional documents at the EU and national level, and the review and evaluation of existing scholarly literature, expert studies, projects, CSO and media reports. Our research has also been informed by the methodology applied in similar research (Niewitała–Rej, 2025) that evaluated the territorial and distributional aspects of just transition in National Energy and Climate Plans (NECPs). The methodology constituted a comprehensive checklist of good governance criteria, which should be fulfilled to properly integrate just transition policies and measures into NECPs. The methodology was used to assess four draft NECPs of Italy, Germany, Poland and Bulgaria. The most relevant aspect of this methodology is stakeholder engagement and public consultation, which assesses the level of active and systemic inclusion of all relevant stakeholders and a wide representation of the general public as a crucial condition for procedural justice of the energy transition. The conclusions from studying the level of public consultation of the NECP with social partners, civil society actors and the general public in the discussion of just transition have informed the current research.

This study employs data triangulation by systematically cross–referencing three distinct streams of evidence to ensure the validity of the findings and mitigate the potential biases inherent in desk–based research. First, we analyse official normative and strategic documents (such as the TJTP, internal rules of procedure, and meeting minutes) to establish the formal parameters of participation. Second, these official narratives are juxtaposed against critical reports from CSOs and media coverage, which provide qualitative evidence of the practical constraints and stakeholder sentiment regarding the process. Finally, the findings are robustness–checked against external academic studies on transition governance in Bulgaria (e.g., Trifonova et al., 2022; Topaloglou et al., 2024) to verify that the identified patterns of limited engagement are consistent with broader scholarly observations. This triangulation ensures that the assessment of the extent of citizen participation reflects a balanced synthesis of government intent and civil society reality.

The analysis operationalises a four–point evaluation scale (0–3), adapted from Stefańczyk et al., 2023, to assess citizen participation across two dimensions: breadth and depth. Breadth refers to the extent to which participation is formally provided for and institutionally organised, including the existence of consultation mechanisms, standing bodies, stakeholder representation, and the regularity of meetings. Depth refers to the substantive influence that citizens and civil society actors can exercise over planning and implementation, including the extent to which their input is considered and incorporated into decisions and whether they have meaningful decision–making

powers. These dimensions are assessed through two distinct criteria in Table 4: (1) effective participation in the planning and implementation phase, and (2) participation in formal structures for implementation. Each criterion is scored separately against its own descriptors. The scores indicate the level of participation demonstrated by the available evidence, rather than constituting a single, undifferentiated scale.

The scoring criteria are operationalised as follows:

- Score 0 (non–existent participation): indicates a complete absence of participation mechanisms; no public consultations are organised, or relevant issues are entirely excluded from the agenda;
- Score 1 (limited extent of participation – tokenism): represents formalistic participation with operational indicators that include the existence of a legal framework or public consultation periods, but where evidence (such as lack of responses to NGOs' comments or disregarded feedback) demonstrates that citizen input does not alter the final planning documents;
- Score 2 (significant extent of participation – consultative): represents structured consultation with operational indicators that include the establishment of permanent bodies (such as the Just Transition Subcommittee) that meet regularly and include diverse stakeholders. However, the extent of participation is capped at this level if voting rules or advisory status prevent these stakeholders from exercising binding decision–making power; and
- Score 3 (exemplary extent of participation – co–decisional): represents empowerment, and the operational indicators would include early inclusion, full information symmetry, and voting structures where citizen and NGO representatives possess equal weight to public authorities, resulting in a demonstrable impact on implementation.

The two criteria in Table 4 capture breadth and depth in complementary ways. The first assesses the inclusiveness and substantive scope of participation in planning and implementation; the second examines participation in formal implementation structures, including stakeholder representation and influence on decisions. Scores must therefore be interpreted against the specific descriptors for each criterion.

Table 4. Selected criteria for stakeholder engagement and public consultation
Source: Adapted from Stefańczyk et al. (2023) by the authors.

Effective participation in the planning and implementation phase	Engagement of civil society actors and the general public in the planning and implementation of the TJTP of the Stara Zagora region.	0 - Public consultations were not organised, nor were any of the issues related to the just transition discussed during the course. 1 - A formal framework for public consultations has been established, but the extent of the impact on the discussed issues related to the just transition has been limited. 2 - Effective consultations were organised, and most of the crucial issues related to the just transition were discussed, but not all of them. 3 - Early and inclusive public consultations were organised, and all of the important issues related to the just transition were discussed in sufficient detail.

Participation in formal structures for implementation	Establishment of a permanent body of consultation with stakeholders for the implementation of the TJTP of the Stara Zagora region.	0 - Does not provide a permanent body of public consultation, or the one proposed is one-time only. 1 - Provides some outline of a permanent consultation body, but lacks fundamental details. 2 - Provides the consistent set-up of a permanent consultation body where representatives of citizens and NGOs can participate but do not impact the implementation of the TJTP. 3 - Provides a highly detailed and consistent plan set-up of a permanent consultation body where representatives of citizens and NGOs can meaningfully impact the implementation of the TJTP.

3.3 CASE STUDY SELECTION

The region of Stara Zagora has been selected for several reasons. Firstly, it is the largest coal and mining region in Bulgaria, and along with Poland and Czechia, contributes to over 95% of the EU's planned coal–fired electricity generation in 2030 (Ember, 2021). Secondly, it has been noted by previous research that the region is lagging in terms of stakeholder and citizen participation with respect to just transition–related processes, and has high risks of severe material and social deprivation, poverty and social exclusion (Peretto et al., 2025). This makes the region an intriguing case study and can provide important implications for policy improvements in coal regions with similar demographic, social, political and economic characteristics (Topaloglou et al., 2024).

The magnitude of the transition challenge is unique within Bulgaria. The local economy is deeply dependent on fossil fuel industries, employing over 13,000 people directly in mines and power plants. Projections indicate that the coal phase–out will affect approximately 35,000 direct and indirect jobs. Consequently, the region faces high risks of severe material deprivation, poverty, and social exclusion, making the transition process politically sensitive and highly contested (Centre for the Study of Democracy, 2023). This high concentration of economic risk makes Stara Zagora the most significant testbed for the Just Transition Mechanism in Bulgaria.

Analytically, Stara Zagora represents a critical case for procedural justice and for examining the gap between the theory of just transition and the practice of citizen participation. Topaloglou et al. (2024) indicates that, compared to previous research, compared to similar regions in Greece and Poland, Bulgaria — and specifically Stara Zagora — displays the lowest levels of stakeholder inclusion, characterised by insufficient communication channels and a lack of access to detailed transition information.

Public discourse regarding the future of coal mining has been delayed, and political deliberations over the TJTP of Stara Zagora have largely remained confined to the national level (Topaloglou et al., 2023). In September 2023, the Bulgarian Council of Ministers formally announced the country's commitment to phase out coal by 2038. Under this decision, coal–fired power plants and mining operations are to be gradually decommissioned, with provisions for affected workers to receive either

financial compensation or targeted support through a newly established state–owned enterprise dedicated to facilitating the coal transition. This enterprise, named State Enterprise 'Conversion of Coal Regions', is intended to be created in the near term to coordinate measures supporting economic restructuring and workforce adaptation (European Commission, 2024).

This lagging status regarding participation makes the region analytically appropriate for investigating barriers to procedural justice. It allows for an examination of how governance structures function in a context where the need for social dialogue is acute, yet the mechanisms for it are reportedly weak. Furthermore, addressing the lack of understanding regarding how public demands are articulated and negotiated requires learning from specific governing regimes with distinct characteristics. By focusing on a region where stakeholders have emphasised risks of moral resistance and non–acceptance, this case study offers high–value implications for policy improvements in other coal regions facing similar demographic and political challenges.

Few scholars have analysed citizen and stakeholder participation in Stara Zagora's just transition. Topaloglou et al. (2024) note that stakeholder engagement has not been sufficient in the just transition of Stara Zagora. Findings show that stakeholder engagement in Stara Zagora is limited, particularly at the consultation and involvement levels. Information dissemination occurs, but systematic dialogue and participation in decision–making remain weak. Compared with Greece and Poland, Bulgaria had the lowest stakeholder inclusion, with insufficient communication channels and a lack of access to detailed transition information. Stakeholders face greater risks from inadequate engagement, including increased uncertainty, loss of trust, and non–acceptance of transition outcomes.

3.4 LIMITATIONS

The primary limitation of this study is its reliance on desk–based research within a relatively short timeframe (2022–2025). Because the implementation of the TJTP is in its early stages, having only recently established key governance bodies such as the Just Transition Subcommittees, it is too early to fully assess the long–term impact of citizen participation on governance outcomes. Additionally, when analysing secondary sources, the research lacks control over the original data collection and analysis methods, which may introduce unknown variables.

Specific limitations arise from the highly contested nature of the transition in Stara Zagora. The political sensitivity of the coal phase–out has historically led to delays in public discourse and decision–making. Consequently, data accessed from governmental institutions may be incomplete or biased, as official policy documents might downplay conflicts or exclude critical feedback to present a narrative of consensus.

Conversely, reports from NGOs and the media often highlight a lack of transparency (Aleksieva et al., 2024) and disregard for the partnership principle. While these provide critical counter–narratives, relying on them without access to internal government deliberations (due to the lack of primary interviews) limits the ability to fully verify the reasoning behind the rejection of citizen feedback.

Finally, desktop research inherently focuses on formal mechanisms of participation (e.g., written opinions, committee membership). It may fail to capture informal dynamics, such as hallway conversations or unrecorded political pressure, which are often significant in politically charged environments. As such, this study sets the stage for further exploration but does not produce primary data on new, rapidly emerging issues on the ground.

4. RESEARCH RESULTS

4.1 CITIZEN PARTICIPATION IN THE PLANNING OF THE TJTP

Our study has analysed citizen participation at two key stages of the just transition process in Bulgaria and more specifically at the planning and implementation stage of the TJTP for the Stara Zagora region in the period 2022–2025. At the planning stage, when the draft document was discussed, the TJTP was published for public consultations in the period 2 August to 23 August 2022. During the 3 weeks of consultations on the draft TJTPs, feedback was received from 37 stakeholders, including representatives of the local authorities, electricity producers, social partners, industry, NGOs, and academia (Ministry of Energy, 2023). The stakeholders raised the following concerns:

- the target of 40% CO_2 emissions reductions by 2026 in comparison to 2019 is very high, especially in view of the current geopolitical context (energy security, high energy prices, etc.);
- a clearer governance mechanism is needed in the programming and implementation of the projects under the JTF;
- large enterprises should be included in the scope of the TJTP of Stara Zagora due to their importance for the local economy and positive feedback about the creation of the state–owned company 'Conversion of Coal Regions';
- TJTPs should include measures for support of the released workers, including options for accepting compensation packages in the form of reimbursements or shares in future new industries in the region; and
- the need was stressed for the development of and public discussion on a new Energy Strategy of Bulgaria, presenting a vision of the sector's development.

The TJTP was further published for public consultation in the period 4 November 2022 – 5 December 2022 as part of the strategic environmental assessment (SEA) of the amendments and supplements to the Regional Development Programme 2021–2027 (RDP 2021–2027), including new priorities under the Just Transition Fund, developed through Territorial Just Transition Plans of the Republic of Bulgaria for the regions at NUTS 3 level – Stara Zagora (and adjacent municipalities), Kyustendil and Pernik.

The SEA provides procedural opportunities for citizens and NGOs to submit comments to the strategic document. According to the consultation plan published by the Ministry of Regional Development and Public Works (MRDPW) and the Ministry of Energy[3] during the development of the SEA report, consultations were to be

[3] Schedule for consultations with the public, interested bodies and third parties likely to be affected by the amendments and supplements to the Regional Development Programme 2021–2027 (Ministry of Regional Development and Public Works & Ministry of Energy, Republic of Bulgaria, 2022).

held with the competent environmental authority – the Ministry of Environment and Water, various institutions, non–governmental organisations, individuals and legal entities that may be interested in the implementation of the updated programme. The consultations could be formal and informal, and include:

- Formal consultations – conducted through official letters, publications in the mass media and/or on the website of the Contracting Authority – MRDPW and the website of the RDP 2021–2027 – www.bgregio.eu, as well as on the website of the Ministry of Energy (ME) – www.me.government.bg. Method of implementation: sending written information with an invitation to submit opinions and proposals; and
- Informal consultations – carried out through informal meetings between experts on the environmental assessment with representatives of the Contracting Authority – MRDPW, ME and other interested parties.

Based on publicly available information about the comments and suggestions submitted by the stakeholders, the research could not identify any feedback from citizens and NGOs. A positive SEA Decision 3–2/2023 authorising the amendments to the RDP was issued (Ministry of Energy, 2023).

The final draft of the TJTP of Stara Zagora (Council of Ministers of the Republic of Bulgaria, 2024) was submitted for public consultation in the period 14 August 2023 – 13 September 2023. Among the submitted comments were two detailed opinions coming from established environmental NGOs, which criticised the draft TJTP, including the process of its preparation. According to Za Zemiata NGO, during the process of preparing the TJTP, the principles of partnership and transparency were not respected and stakeholder participation was lacking, especially in the development of the draft plans after the initial public consultation. It is important for stakeholders to be involved throughout the process because it has been noted that they did not see any responses to their comments or other submissions following the public consultation of August 2022. In order for the public consultation not to be perceived as a mere formality required by the European Commission, but to be a truly useful process, the NGOs called for feedback on the views from the Ministry of Energy and dialogue during the implementation of the plan.

4.2 CITIZEN PARTICIPATION IN THE IMPLEMENTATION OF THE TJTP

Formal participatory mechanisms for the just transition in Bulgaria

Citizens may participate in the just transition through formal and informal participatory mechanisms. Due to limited data on the existence and forms of informal mechanisms, the focus of this research has been mostly on formal mechanisms. The implementation of the TJTP is strategically positioned within the hierarchy of Bulgaria's regional development planning, and it is directly related to the Regional Development Programme (RDP) 2021–2027. The RDP is part of a broader, multi–level hierarchy of strategic planning in Bulgaria. It serves as the operational mechanism for financing and implementing the TJTPs, utilising significant funding from the European Union's

Just Transition Fund (JTF), totalling approximately €1.2 billion for Bulgaria. The TJTPs fit into this structure as strategic territorial instruments for the three designated coal regions — Stara Zagora, Kyustendil, and Pernik.

Stakeholder involvement at these two tiers of planning (RDP 2021–2027 and TJTP) has been realised through two management structures – the Monitoring Committee (MC) at the level of RDP 2021–2027 and Just Transition Subcommittees (JTSs) for the three coal regions in Bulgaria. The Internal Rules of Procedure of the MC (MRDPW, Republic of Bulgaria, 2024) provide for setting up and operating the MC and the JTSs for the three coal regions. The MC oversees overall implementation, approves methodologies and selection criteria for various support measures, and manages the indicative annual work programme. It is composed of representatives of various state administrations (e.g., Ministry of Finance), the National Statistical Institute, local government bodies, academia, social partners and NGOs, including those working in the environmental field.

The tasks of the JTS, on the other hand, include: participation in the preparation of criteria for the selection of projects and guidelines for the provision of financing under the JTF; participation in the monitoring of progress in the implementation of investments supported under the JTF; development of motivated positions for consideration by the MC related to the implementation of the JTF; and not least, participation in active communication with and the engagement of civil society through information events organised by the JTS secretariat. The 2038 phase–out commitment has been closely aligned with Stara Zagora's TJTP, which was approved by the European Commission in December 2023. In 2024, a JTS was created in the Stara Zagora region to provide ongoing expert support at the territorial and regional level to the implementation, monitoring, and achievement of the objectives set out in the TJTP. More specifically, the tasks of the JTS with national and local policy–makers, and civil society representatives, include: (1) participating in the preparation of criteria for the selection of projects and guidelines for the provision of funding under the JTF; (2) monitoring the progress of investments supported by the JTF and reports on the achievement of the set indicators and specific objectives; (3) identifying potential risks in the implementation of activities at the regional level; (4) developing positions/opinions/reports/proposals for consideration by the MC of the RDP, related to the implementation of the JTF; (5) discussions and debates, and preparing positions and opinions on policies related to the region's transition to climate neutrality and the achievement of decarbonisation targets; (6) preparing annual reports on the implementation and progress of investments and the achievement of the set objectives under the just transition priority; (7) participating in active communication and engagement with civil society, raising awareness of the objectives of the TJTP and the Just Transition Fund through information events organised by the subcommittee's secretariat. The effectiveness of the JTS has not been examined in prior research, while it has been highlighted with its role to develop and discuss criteria for the selection of projects and guidelines for the provision of funding under the JTF, the main mechanism which implements the TJTP.

The Territorial Just Transition Plan (TJTP) for Stara Zagora also envisages specific measures to engage young people during implementation. The Development of Regions Programme 2021–2027, version 2.2, provides for periodic seminars, roundtables and site visits for secondary–school pupils, university students and young graduates, aiming to encourage them to remain in the region and contribute to local economic diversification (Ministry of Regional Development and Public Works, Development of Regions Programme 2021–2027, version 2.2, p. 124).

Role of citizens and NGOs in the work of the decision-making bodies

Bulgaria has implemented the partnership principle in the Stara Zagora region by establishing a JTS as a sub–committee of the MC of the RDP 2021–2027. This institutional arrangement aims to ensure the involvement of local stakeholders and the alignment of the TJTP with the local context and implementation specifics of the region. The JTS has been designed as an intermediary and facilitator between competent authorities at national, regional, and local levels, as well as representatives of the private sector, NGOs, and citizens.

The extent of citizen participation in the work of the Monitoring Committee as a decision–making body for just transition implementation has direct relevance to the setup and operation of the JTS in the Stara Zagora region. For example, the 4th meeting of the MC approved the establishment of JTSs in the three mining regions of Pernik, Kyustendil, and Stara Zagora. These sub–committees were charged with the task of assisting in the preparation, implementation, monitoring, and reporting of activities under Priority 4 Just Transition of the RDP, co–financed by the Just Transition Fund.

A review of the minutes of eight meetings of the MC in the period 18 August 2023 – 25 February 2025 shows that citizen participation was expressed primarily through the submission of written opinions, comments, and remarks on draft documents, leading to corrections and the refinement of decisions. The participation of civil society and stakeholders was carried out mainly through membership and representation in the MC. The members of the MC, representing NGOs, trade unions and other interested institutions, have the right to vote or observer status, which allows them to submit official opinions and comments. During the written decision–making procedures, members and other stakeholders could express formal opinions on the documents submitted for approval (e.g., draft amendments, methodologies and selection criteria). For example, Habitat Bulgaria, as a representative of NGOs in the field of social inclusion, submitted a statement on the amendments to the JTF.

It should be noted, however, that according to the Internal Rules of Procedure, a draft decision shall be deemed to have been adopted when it is agreed by more than two–thirds of the members with a right to vote; in the absence of a written response from a member of the Committee, it is deemed that they had agreed to the draft decision without comments. This decision–making rule means that any opinion and comment by NGOs, especially raising objections, cannot substantially influence the decisions of the MC, which consists of 64 members, out of which only 6 are NGOs

from different sectors (e.g. fundamental rights, education, sustainable development). Moreover, in the decision–making process, the role of the chairperson and the secretariat, which prepares the drafts of the decisions, is critical.

An analysis of the minutes from the meetings of the JTS under the MC of the RDP 2021–2027 for the Stara Zagora region (first, third, fourth, and fifth meetings[4]) indicates that citizen participation is institutionalised and formal, carried out primarily through representation in official structures and written opinions, but with limited direct influence on the final decision–making of the Managing Authority (MA). The participation of citizens and relevant stakeholders is mainly realised through representation in the JTS and the presentation and discussion of opinions from the NGO representatives in the JTS.

The JTS includes a wide range of representatives, which is consistent with the partnership principle established in Regulation (EU) 2021/1060 (EPCEU, 2021b). The primary form of participation is through expressing opinions and submitting written positions on draft documents. There have not been many instances where the representatives of an NGO expressed an opinion. One of them was when a representative of the NGO Green Balkans put forward a specific proposal to include the Law on Biological Diversity in the justification for the procedure on the socio–economic transformation of mining territories.

Our study of the work of the JTS between May 2024 and October 2025 shows that, although NGO representatives participate regularly in the process, their contributions appear to have limited substantive influence: while some input may have led to corrections and refinements of decisions, documented instances of NGO input are few and their overall influence remains negligible. The mandate of the JTS is consultative, not decisive, in nature: the JTS is an advisory body to the Monitoring Committee. The final decisions on the methodologies and selection criteria are made by the MC. Citizen participation is institutionalised and expressed mainly through submitting written statements and comments during meetings. The MA undertakes the commitment to consider and reflect the opinions, but does not guarantee their full acceptance. During the discussion of procedures, tension often arises between the national regulatory frameworks (state aid, eligible beneficiaries) and local needs and proposals. For example, the proposals to change the criteria for energy efficiency require approval from the MC. In addition, it is not always clearly tracked in the minutes exactly how each opinion is reflected in the final documents, which complicates the assessment of the actual impact of citizen participation.

The overall assessment is that stakeholder participation in the JTS for Stara Zagora is regular and comprehensive in terms of representation, but remains consultative in nature, with its effectiveness determined by the ability and willingness of the MA to integrate proposals into the decision–making process, which remains centralised at the Monitoring Committee level.

[4] The second meeting is excluded since its minutes are publicly unavailable.

5. CONCLUSIONS

The present study contributes to understanding the participation of civil society in the government's strategic planning of EU–driven decarbonisation in Bulgaria's main coal mining region, Stara Zagora, by analysing the level and specific forms of citizen participation in the planning and implementation of the Territorial Just Transition Plan (TJTP) for the region during the period 2022–2025. Although it is early to assess the full extent of citizen participation in the implementation phase, some key conclusions may be drawn. Our analysis, informed by an adapted methodological framework for stakeholder engagement, indicates that while a formal structure for citizen involvement exists, its effectiveness remains limited.

The research addressed the extent of citizen participation in the TJTP planning and implementation process in Stara Zagora. The evaluation of citizen and civil society engagement based on the adapted criteria yields the results presented in Table 5. At the level of engagement in planning and implementation of the TJTP, a score of 1 was assigned for the level of effective engagement of civil society actors and the general public in the planning and implementation of the TJTP. This signifies that a formal framework for public consultations was established, but the actual impact on the discussed issues related to the just transition was limited. At the level of implementation through the establishment of a permanent consultation body for the TJTP, a score of 2 was assigned. This signifies the fact that a permanent consultation body (the JTS) has been consistently set up in which representatives of citizens and NGOs participate, though they do not appear to directly impact the implementation of the TJTP. The score is in line with the assessment criteria for the level of participation in formal structures for implementation as presented in Table 4.

Table 5. Extent of engagement of civil society actors and the general public in the planning and implementation of the TJTP of the Stara Zagora region

Source: Authors' contribution.

Effective participation in the planning and implementation phase	Engagement of civil society actors and the general public in the planning and implementation of the TJTP of the Stara Zagora region.	1 – A formal framework for public consultations has been established, but the extent of the impact on the discussed issues related to the just transition has been limited.
Participation in formal structures for implementation	Establishment of a permanent body of consultation with stakeholders for the implementation of the TJTP of the Stara Zagora region.	2 – Provides the consistent set-up of a permanent consultation body where representatives of citizens and NGOs can participate, but do not impact the implementation of the TJTP (emphasis ours).

The planning and implementation of the TJTP provided distinct formal avenues for citizen engagement. During the planning phase (2022–2023), the government organised three separate public consultation periods to draft the TJTP and its associated SEA. Procedurally, these opportunities were structured through official publications and invitations to submit written opinions. In the implementation phase, opportunities were institutionalised through the establishment of the MC and the regional JTS. The JTSs, explicitly designed to reflect local specifics, serve as a territorial link between national institutions and local stakeholders. Additionally, the framework includes specific provisions for engaging youth through workshops and roundtables.

Despite the formal opportunities, significant structural and procedural constraints limit the extent of citizen participation and influence. The JTS is strictly an advisory body; it cannot make binding decisions, which are reserved for the central Monitoring Committee. Within the Monitoring Committee, decision–making rules require a two–thirds majority, and the absence of a written response is counted as agreement. With NGOs holding only a small fraction of the seats (e.g., 6 out of 64 members), their ability to block or alter decisions is mathematically negligible. The NGOs reported a "lack of transparency" and noted that they did not receive responses to their comments, leading to a perception that consultations were a "mere formality". Moreover, the Managing Authority retains the discretion to accept or reject opinions without guaranteeing their reflection in final documents.

The observed practices diverge significantly from the good governance criteria outlined in EU methodological toolkits. While the EU guidelines advocate equal status and co–decisional rights (e.g. giving citizens equal voting power), the Stara Zagora model restricts citizens and NGOs to a consultative status. The system fulfils the requirement for partner inclusiveness by embedding stakeholders in the JTS, but it fails to meet the standards for transparent feedback channels and information symmetry, as evidenced by the lack of responses to NGO submissions. Consequently, the substance of participation falls short of the procedural justice standards required for a genuinely inclusive transition.

6. POLICY RECOMMENDATIONS

To strengthen citizen participation in the just transition of Stara Zagora and align the process more closely with the EU's methodological recommendations for effective governance, the following policy recommendations are offered:

- *Mandate equal status and co-decisional rights.* The analysis revealed that the JTS functions strictly as an advisory body. Furthermore, within the decision–making Monitoring Committee (MC), NGOs hold only a small fraction of seats. The current voting rules, which require a two–thirds majority and tacit agreement, effectively render civil society powerless to block or alter decisions, reducing participation to a mere formality. The principle of giving equal status, which includes explicit calls for equal voting rights among all participating actors, must be institutionalised. This is necessary to move beyond consultation and establish

formalised mechanisms for power–sharing, thereby avoiding the democratic dilution that occurs when citizens are excluded from binding decision authority. The Just Transition Subcommittee should transition from an advisory body to one with substantive decision–making authority;

- *Ensure information symmetry and transparent feedback channels*. The study found that it is currently difficult to track how specific opinions are reflected in final documents, which NGOs cited as a disregard for the partnership principle. Authorities must commit to providing identical information to all stakeholders, especially to the NGOs and the general public, simultaneously and without delay, to establish deliberative conditions and prevent epistemic power imbalances. Furthermore, institutionalised routes for clear, visible, and actionable input exchange are critical for maintaining participation legitimacy and enabling iterative accountability;
- *Implement continuous and accessible community engagement*. Current participation is confined primarily to institutionalised representation in committees and written opinions. While the TJTP envisages youth engagement through workshops and roundtables, the available evidence does not establish the extent to which these activities have been implemented, and as a whole, the general public remains largely disconnected from the technical decision–making process. Engagement must extend beyond formal NGO representatives, requiring systematic public outreach through conferences, online fora, or facilitated community deliberation to ensure the affected public has channels to contribute meaningfully throughout the policy cycle. The existing initiative to engage youth through workshops and roundtables is a good practice that should be expanded; and
- *Institutionalise public transparency and timeliness*. Public auditability should be embedded into the process by publishing meeting minutes and decision rationales within a short timeframe, such as two weeks, allowing citizens external to formal governance bodies to track deliberations and scrutinise strategic congruence.

The current findings indicate that while Bulgaria has established the formal structures for citizen participation, the substance of that participation falls short of the procedural justice standards advocated by the EU methodological toolkits, particularly concerning equal power and inclusive implementation. Addressing these procedural deficiencies is paramount to building the necessary legitimacy, trust, and shared ownership required for a genuinely just and successful transition in Stara Zagora and other coal regions in Bulgaria.

7. RESEARCH IMPLICATIONS

The case of the just transition of Stara Zagora TJTP reveals a significant implementation gap between EU normative standards and national administrative realities. While EU toolkits explicitly advocate equal status and co–decisional rights to ensure procedural justice, the actual governance model in Stara Zagora TJTP remains centralised and top–down. The dominance of the Monitoring Committee,

where civil society voices are diluted by majority voting rules, implies that without strict EU conditionality regarding how partnership is operationalised, just transition risks becoming a rhetorical device rather than a governance practice. This suggests that EU funding mechanisms may need to enforce qualitative participation metrics — such as voting parity — rather than merely checking for the existence of consultative bodies.

As the Stara Zagora region, alongside regions in Poland and Czechia, contributes to over 95% of the EU's planned coal–fired electricity generation in 2030, its governance trajectory serves as a bellwether for the hardest–to–abate territories. The study illustrates that in regions with high economic dependence and political sensitivity, formal consultation without substantive influence fails to build trust. If the limited stakeholder engagement observed here persists, it risks generating the moral resistance and non–acceptance warned of in the literature. This case implies that for other coal heartlands, successful decarbonisation requires governance structures that can absorb and act on local dissent, rather than merely channelling it into advisory dead–ends.

For local stakeholders, the study highlights the risks of participation fatigue. The evidence shows that while NGOs actively provided detailed technical feedback — such as on biodiversity law — the lack of transparency and feedback loops created a perception of the process as a mere formality. This implies that if the transition governance continues to extract legitimacy from civil society participation without returning substantive influence, stakeholders may disengage, eroding the shared ownership essential for long–term stability.

Finally, this research underscores the analytical necessity of distinguishing between the breadth and depth of participation. By utilising a scoring system that differentiates between formal frameworks (Score 1) and co–decisional participation (Score 3), the study demonstrates that the presence of institutions such as the Just Transition Subcommittee does not automatically equate to procedural justice. Future research on just transition should therefore move beyond mapping stakeholders to auditing decision trails — tracking specifically how citizen inputs travel from consultation rooms to final policy documents.

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