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**Stakeholder Engagement Plan (SEP)  
for Western Macedonia**

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## I. Introduction/Project Description

1. In October 2014, the European Council agreed on a new 2030 Framework on Climate and Energy. The Framework implies a reduction in coal-derived energy for member states by 2030, in so far as the EC has set a target of 32% share of national energy mix derived from renewables, and a 40% cut in greenhouse gas emissions. National energy mix composition varies considerably amongst Member States. Increasingly apparent is the fact that across the EU, transition towards a low-carbon economy will require considerable technical and financial assistance. At present, 41 EU regions are categorized as being coal dependent and/or intensive across 12 member-states, with regional membership growing.

2. The European Commission, through the “EC Platform for Coal Regions in Transition” (“the Platform”), assists EU Member States and their regions to meet the 2030 Framework targets, principally by facilitating the exchange of technical information and learning experiences of the regions in transition. It further provides a forum for the evaluation of member’s transition strategies and proposed reforms, and the review of investment projects that frame the coal transition.

3. A prerequisite to participate in the Platform is the preparation of a comprehensive strategy for transition towards a low carbon economy; and thereafter the identification of concrete investment projects that can be financed by other branches of the EC, such as the Structural Reform Support Service (SRSS). The Regional Government of Western Macedonia gained membership to the EC’s Coal Regions in Transition Platform in early 2018; and it is an official pilot country within the Platform. At the invitation of the Platform, the World Bank is a partner to the Platform. In February 2018, the Region of Western Macedonia – through the Ministry of Environment & Energy – applied an advisory services funding request to the EC’s SRSS for supporting the region in its transition to a low-carbon economy. The WBG is providing support since February 2019 in close coordination with the SRSS.

### Box 1

The European Commission considers the Czech Republic’s approach towards Economic Restructuring of the Coal regions (referred to RE:START) as a good practice for other European Countries and actively presents these efforts in the Czech Republic as a role model for other countries. The ‘Czech model’ involves the functional cooperation with the representatives of all three affected regions, where communication with the stakeholders has been established both within and across the relevant regions. This cooperation and participation in the fulfilment of the Strategy contributes to beneficial cooperation in the performance of the individual measures and to the subsequent drawing of funds under the relevant calls. Still, in its assessment report on the implementation of the Strategy during 2018, one of the recommendations for 2019 was to “strengthen the involvement of the public – both general and professional in the RE:START economic restructuring process”. (Source; *On The Implementation Of Measures Under The Summary Action Plans For The Economic Restructuring Of The Ulr, Msr And Kvr(01. 01. 2018 – 31. 12. 2018, Ministry of Regional Development of The Czech Republic)*

4. In July 2018, the World Bank shared with the Regional Government of Western Macedonia its new Working Paper, “*Managing Coal Mine Closure: A Just Transition for All*”<sup>12</sup> which underscores early, effective planning and preparation measures that would strengthen the overall governance framework by

<sup>1</sup> Stanley, Michael C.; Strongman, John E.; Perks, Rachel Bernice; Nguyen, Helen Ba Thanh; Cunningham, Wendy; Schmillen, Achim Daniel; McCormick, Michael Stephen. 2018. *Managing Coal Mine Closure: Achieving a Just Transition for All*. Washington, D.C.: World Bank Group. <https://hubs.worldbank.org/docs/imagebank/pages/docprofile.aspx?nodeid=30484336>

<sup>2</sup> The report has been chosen as the flagship report for the World Bank to be launched at COP24 in Katowice, Poland, on December 11<sup>th</sup> 2018.

updating strategies and policies, and institutional capacities; together with building institutional capacity at the state, regional and municipal levels. Secondly, the report underscores the importance of beginning with a structured process of stakeholder engagement to ensure informed decisions that are inclusive of the views of impacted workers and communities, industry, government, donors, and non-governmental organizations. Thirdly, an effective transition from lignite will require a sustained programmatic series of public and private sector investments across decades; supported by consolidated funding mechanisms that target priority investment projects for new, lower carbon industries.

5. In subsequent discussions with the World Bank, the proposed approach of the Greek government was refined to focus initially on key preparatory activities that would strengthen processes and governance structures, leading to development of a comprehensive Road Map for a Regional Transition Towards a Low Carbon Economy (referred to as ‘Road Map’). The Road Map is organized around a “Coal Sector Adjustment and Just Transition Planning Assessment Framework”, developed on the back of the publication of the Working Paper, provides a clear methodology for planning with three thematic “pillars”: (i) government systems; (ii) people and communities; and (iii) repurposing land and assets. Pillar (i) addresses i.a. the strengthening of the governance framework needed to support the transition, and the development of a comprehensive stakeholder engagement strategy to accompany the transition, since a socially inclusive approach to stakeholder engagement is necessary given the structural economic constraints facing the region.

### **1.1. Western Macedonia – The Coal Region of Greece**

6. Western Macedonia is the only land-locked region within Greece, covering an area of 9,451 km.<sup>2</sup> Its population of 271,500 inhabitants<sup>3</sup> constitutes around 2.6% of the national total. Despite being a center of intensive energy production, the province lags economically, mainly due to the economic reliance on the lignite mining and associated lignite-fired thermal power generation (hitherto referred to as the “coal value chain”). The coal-based economy contributes more than 34% of the Gross Added Value of the Region (~ € 1.5 billion / year). Regional GDP per capita is 25% lower than the national average and has dropped significantly as a result of the country’s financial crisis, which began in 2009. The region has supplied electricity to Greece’s interconnected electricity system since 1960, acting for several decades as the Greek energy pillar of economic growth. Today, open-cast lignite mining extends across 160 thousand acres with an additional four lignite-fired power plants (of 12 units in total), representing 20% of the total installed net capacity of the interconnected electric system of Greece. In addition to electricity, about 10,000 citizens of Kozani, Ptolemaida and Amyntaio within the region are heated by district heating systems that utilize heat from these lignite-fired power plants.

7. The Western Macedonian energy system includes the entire value chain, i.e. from lignite mining through to power production, which is operated by the Public Power Corporation S.A. (PPC). PPC has lignite mining areas adjacent to many of its power plants, with a heavy concentration in Western Macedonia. These power plants produce electricity and power from lignite. Today, open-cast lignite mining extends across 160 thousand acres with an additional four lignite-fired power plants, representing 20% of the total installed net capacity of the interconnected electric system of Greece. However, the coal power plants in Western Macedonia are inefficient and old with an average plant age of 31 years. The largest mining areas are located between Kozani and Ptolemaida, around Amyntaio in the Florina prefecture and around Megalopolis. The coal sector in Western Macedonia directly provides 5,680 jobs, with 4,280 jobs in mining and 1,400 jobs in coal power plants,<sup>4</sup> but it is estimated that more than 22,500 direct and indirect jobs are in the coal value

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<sup>3</sup> Eurostat (2018) Population by NUTS Region

<sup>4</sup> JRC (2018) EU Coal Regions: Opportunities and Challenges

chain<sup>5</sup> with 75% of those jobs held by PPC. A new study suggests that for each new job created in the coal value chain, 2.6 jobs are created in the local labor market.<sup>6</sup>

8. Against this backdrop, the Regional Government of Western Macedonia intends to undertake an energy transition that will diversify the economy, reduce existing (and mitigate emerging) unemployment, and safeguard social cohesion. It seeks to do so by progressively restructuring the regional economy away from coal. Such a transition hinges on attracting new investments, re-skilling workers, and repurposing other lands and assets for new economic and social good. It further relies on the development of renewables and other clean energy sources. Even though a comprehensive strategy away from coal is yet to be completed, actions have been taken since 2010 with 4 of the oldest power plant units<sup>7</sup> decommissioned. In 2017, the government released a “Development Action Plan for the Post- Lignite Period” which has in part framed the future adjustment action. The National Energy and Climate Plan (NECP) and PPC plans initially confirmed a two-phase scenario for the lignite sector’s adjustment until 2040. The first period from 2020-2030 foresees a 50% reduction in lignite electricity, that is from 33% (2016) to 17 % of the national energy production by 2030.

9. However, following the local and general election in July 2019, the new Government of Greece in September announced its intention to close all coal-fired power plants and their associated lignite mines by 2028. Recognizing the wide-ranging socio-economic impact for the whole region of the planned transition, stakeholder engagement assumes an even more important role in the overall strategy, in line with the recommendations of the “Managing Coal Mine Closure: A Just Transition for All” (WB, 2018). In December 2019, the Board of Directors of PPC approved its new business plan, confirming PPC will cease operating all of its existing lignite-fired power stations by 2023. This process involves the withdrawal of the following lignite units: Five units at the Agios Dimitrios lignite-fired power station totaling 1,456 MW, two units at Amynteo (546 MW), one unit at Meliti (289 MW), all four Kardias units (1,110 MW), and the two units at Megalopoli (511 MW) make up the list of PPC’s existing lignite units planned for withdrawal by 2023. Regarding the approximately 5000 PPC’s employees working at the units and the mines, PPC’s press release indicated that there will be substantial proportion of the workers who have established retirement rights by 2023, while others may either be transferred to a different PPC’s Directorate or possibly be transferred to the public sector according to the latest law of the Hellenic Ministry of Environment and Energy.<sup>8</sup>

**Figure 01: The energy (red colour) Municipalities of Western Macedonia**

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<sup>5</sup> Source: Ministry of Environment and Energy, Region of Western Macedonia. “Road Map Towards a Low Lignite Era,” Presentation made to the Coal Regions in Transition Platform. July 2018.

<sup>6</sup> Ibid.

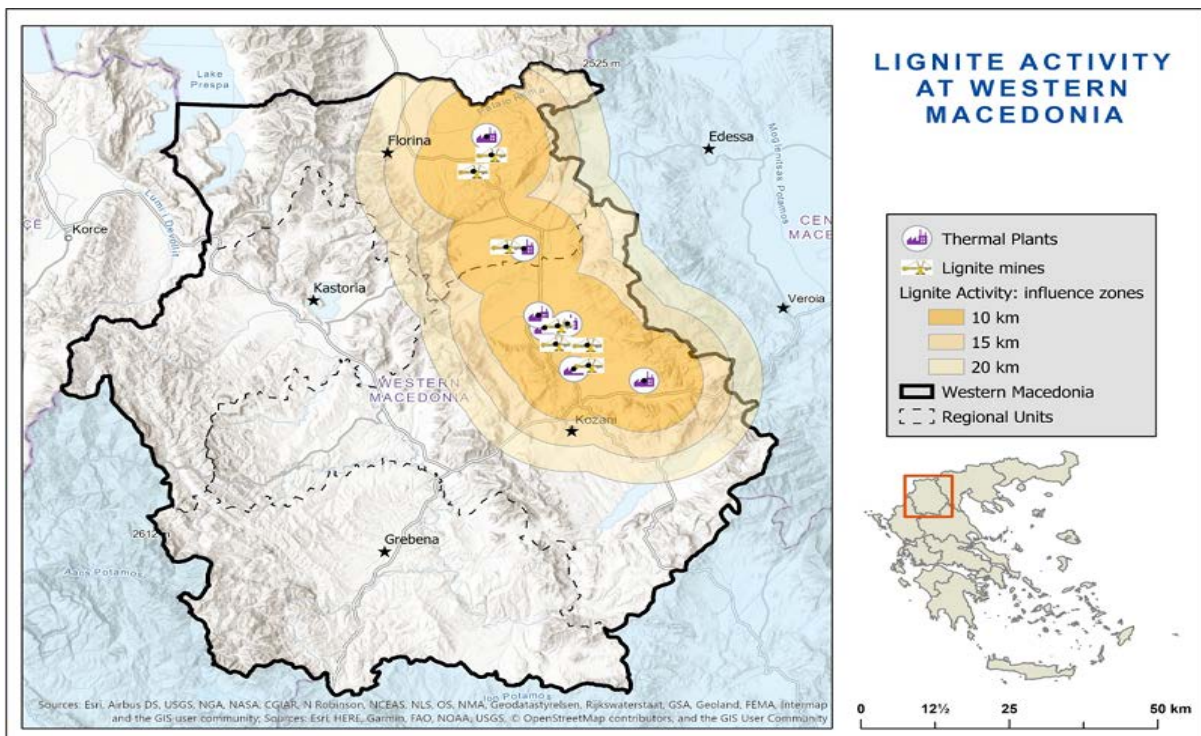
<sup>7</sup> Ptolemaida III and IV with 425 MW installed capacity.

<sup>8</sup> <https://energypress.gr/news/i-dei-kleinei-oles-tis-yfistamenes-lignitikes-mehri-2023-simera-i-egkrisi-toy-business-plan-apo>



Source: Kozani Development Agency (ANKO) in Petrakos G. et al (2019) RELOCAL Case Study Report “A Post-Mining Regional Strategy for Western Macedonia, Greece”

Figure 02: Lignite Activity in Western Macedonia



## 1.2 Objectives of the Stakeholder Engagement

10. The objective of this Stakeholder Engagement Plan (SEP) is to identify, prioritize, and promote consensus as well as fact-based based solutions to the post-lignite transition, with all its implications for the local communities, labor force and regional economy. It plays a key role in the preparations for managing this transition, aiming at ensuring informed decisions that are inclusive of the views of impacted workers and communities, and other stakeholders such as industry, government, donors, and non-governmental organizations. This SEP has been formulated to ensure that directly affected people and other stakeholders are provided relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the transition and its impacts.

11. The SEP provides the framework for the stakeholder engagement and details the timing and methods of engagement with the different groups of stakeholders. SEP does not only identify the different stakeholder groups, but also identifies their needs and circumstances, and how they are being affected by the sub-projects. The SEP pays special attention to identified disadvantaged or vulnerable individuals or groups and determines how to ensure their inclusion in the stakeholder engagement activities. The SEP takes into account the main characteristics and interest of the stakeholders, and the different levels of engagement and consultation that is appropriate for different stakeholders, while defining the interaction with all stakeholders, also explores the opportunities and risks brought by interaction with them.

12. The SEP communication strategy vis-à-vis stakeholders also defines the mechanisms through which the stakeholders can express their concerns and transmit their grievances, and how such concerns and grievances will be responded to in a timely and adequate manner.

13. The first step is mapping stakeholders in order to understand the different stakeholder challenges, positions and roles in the context of the post-lignite transition and the future regional development strategy. Stakeholder consultations are generally characterized by the following:

- are established as an ongoing, sustained engagement through the project lifecycle rather than a one-time conversation;
- designed to be as inclusive as possible;
- go beyond information sharing and establishing a dialogue on how to tackle the given challenges and consider solutions to those challenges that are based on data and research;
- leverage a strong stakeholder communication strategy to sensitize stakeholders, share knowledge and facts, increase ownership of agenda by local stakeholders, and improve transparency in decision making.

## **II. Brief Summary of Previous Stakeholder Engagement Activities relevant to Just Transition**

14. The issue of post-lignite transition has already been subject to several broad discussions in the region, facilitated by various parties. The Working Group for Coal Platform of Western Macedonia and the Regional Development Fund have facilitated discussions with representatives from several stakeholder groups. The Regional Association of Local Government of Western Macedonia has also initiated broader public debates on development issues such as unemployment. Furthermore, NGOs such as WWF and The Green Tank have been instrumental in reaching across broader sections of stakeholder groups to facilitate a discussion on the vision for a post-lignite future for Western Macedonia.

15. In December 2014, the European Green Institute and the Greek Green Institute organized a workshop entitled "Transition of Greece and Western Macedonia in particular to a post- lignite era - challenges and opportunities". The event aimed at collecting information and best practices from European regions that face the challenge of a transition to a post-lignite era, to investigate if and to what extent lignite

will be required in the electricity production system in the decades to come and to outline alternative options for the associated areas. The workshop featured presentations by PPC, the Kozani municipality, the Regional Development Agency of West Macedonia (ANKO), the Ecological Group of Kozani, World Wildlife Foundation (WWF) Greece, Greenpeace, representatives of cooperatives and more.

16. In February 2016, Kozani hosted a two-day conference entitled "Business Reboot of Western Macedonia". The conference was co-organized by the Commercial and Industrial Chamber of Kozani (EVEK), Kozani's RU Civil Partnership for the Promotion of Entrepreneurship (AEPE), the Regional Development Agency of West Macedonia (ANKO), Western Macedonia Prefecture (WMR) and the Central Union of Greek Chambers, which was represented by over 45 chambers. The ultimate aim of the Conference was to designate the "New Business Standard and Development Model" that would "reboot" the local economy and mobilize all the creative voices and forces that share an interest in the region's future.

17. In April 2016 the Kozani municipality in collaboration with the Western Macedonia Region, ANKO, Technical Chamber of Greece-Western Macedonia Department (TCG-WM), the energy municipalities network, the Centre for Research & Technology Hellas (CERTH) and the University of Western Macedonia organized a workshop entitled "Post-lignite era - The Challenge for Western Macedonia" with the participation of representatives of PPC, trade unions, the government, MPs, local businesses and academic bodies, Kozani's Ecological Group and WWF Greece. The workshop also featured presentations of proposals and strategies for an alternative model of development for WMR.

18. Furthermore, a new discussion platform, the Forum of Mayors, was initiated in Kozani in 2018<sup>9</sup>. PPC's main labor union, the GENOP-DEH is Greece's most powerful union, and its president has participated in numerous consultations organized by WWF Greece.

19. Greece notified its integrated National Energy and Climate Plan (NECP) to the European Commission on 25 January 2019. The Greek NECP is based on climate and energy policy documents such as the National strategy for adaptation to climate change and the National circular economy strategy. The NECP was prepared by the Ministry of Environment and Energy. It was subject to debates in the national parliament and other fora (e.g. with local and regional authorities and stakeholders). It also underwent **public consultation**, albeit within a relatively short timeframe and without clarifying the key conclusions from this engagement and how these have been considered in the final form of the draft plan.<sup>10</sup>

20. In the context of the present WB-led work, a number of meetings have been conducted with various groups of stakeholders at national and regional level, to elicit their views and discuss the approach towards decarbonization, repurposing of the mining areas and the future regional development strategy.

### III. Stakeholder Identification and Analysis

21. The key stakeholders who will be informed and consulted about and during the development of the Transition Roadmap comprise individuals, groups, or communities (i) that will be affected or likely will be affected by the implementation of the post-lignite transition being laid out in the Roadmap, and (ii) other interested parties that may have an interest in the post-lignite transition.

22. Considering the key role of the lignite sector in the economy and society of Western Macedonia, as

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<sup>9</sup> Friends of Europe (2018) The regional Dimension of Climate Change

<sup>10</sup> [https://ec.europa.eu/energy/sites/ener/files/documents/gr\\_swd\\_en.pdf](https://ec.europa.eu/energy/sites/ener/files/documents/gr_swd_en.pdf)



well as in the overall energy sector of Greece, the stakeholders of this Managed Transition is very large and diverse, both sectorally and geographically. The potential risks and impacts of the Managed Transition may also be comprehensive, which further underlines the need for a wide-reaching and comprehensive stakeholder engagement, covering the employees of directly affected lignite mines, associated energy plants, government authorities at local, regional and national level, affected communities, labor unions, NGOs and CSOs, academics, researchers, private sector, national social and environmental public-sector agencies, and the media.

23. Stakeholders to the lignite transition are not only found at the sub-national level but also at the national level and are of various interest and degree of influence. The stakeholder groups are very diverse, including (a) the mines and enterprises along the coal value chain across the Kozani – Ptolemais – Florina region (b) community leaders and regional governments, (c) the Greek State, (d) the Public Power Corporation, the Region’s Government, the Energy Municipalities, social and other development agencies, Workers Unions, and other institutions, (e) private sector, banks , and (f) non-governmental organizations, and public participation groups active on coal mining and clean energy initiatives.

## Box 2

*Excerpts from discussions between the World Bank team and the Czech Delegation, Brussels, October 16, 2019*

**What advice would the Czech Republic authorities give to fellow countries and their regions who are embarking now to establish their governance arrangements for transition?**

Long-term, open communication with a wide range of regional stakeholders appears to be essential in the process of preparing transformation strategies - this is the only way to design, together with the use of desk research resources, such transformation processes and concrete implementation measures that have potential to be truly effective. Building awareness that the restructuring / transformation process is indeed a long-term process, where its results cannot be expected in months or units of years, appears to be particularly important. From the viewpoint of process management on the part of the state, it seems similarly important to intensively communicate the whole transformation strategy from the beginning of its preparations in order to enable the preparation of such measures / programs that will meet development needs of the regions and at the same time manage to ensure adequate financing.

**What type of stakeholder consultation outside of government took place to arrive at the structure?**

Long series of consultations with major stakeholders in each of the region were realized. These consultations contained especially regional governors, mayors of towns and villages, company directors, representatives of universities, research organizations and other important stakeholders (consultations had e.g. form of joint workshops, focus groups, structured interviews etc.).

*(Source: Governance Case Study: Czech Republic’s RE:START)*

### 3.1 Affected parties

24. The directly affected parties are PPC and the employees of the lignite mines, which are going to close, the employees of the power plants, which may be transitioning to other forms of energy, with different employee requirements – altogether close to 3200 jobs, of which 2/3 are in mining and 1/3 in the power sector. To this should be added 12 major sub-contractors to PPC supplying transport and equipment to PPC, providing excavator, trucking and various maintenance jobs to PPC, altogether a work force of some 1500 jobs. Negative impact may also affect a number of small sub-contractors, providing different services to PPC, such as catering, cleaning, waste disposal, which cover around 500 jobs.

25. Another section of adversely affected parties would be the large group of temporary workers employed on annual 8 months' contracts by PPC and sub-contractors' project employees, which do not enjoy the job security, which the PPC employees under collective agreement do. These workers are reportedly members of a small labor union, which is not member of the second-tier union of GENOP, so their voice is less heard and their interest not well protected.

26. The employees of PPC and its satellites in mining operations and power production are unionized mainly in the union of Spartakos plus a few minor unions. However, all these primary unions (business unions as well as sector unions) are members of GENOP, which is the largest labor union in Greece, with a membership of 27 primary unions, of which 6 are located in Western Macedonia. GENOP is representing its members vis-à-vis PPC and its satellites, and is also leading the strategic discussions internally among the members regarding the post-lignite transition. Employees of the various sub-contractors to PPC are not unionized, and most of them are employed on project contracts rather than full time employees.

27. All the above direct stakeholders would be affected by the transition out of lignite by 2023, where the jobs in the lignite mines as well in the lignite fired power plants would disappear. Currently PPC has some 2,128 people employed in mining and 1,161 in the power plants. By 2023, many of these employees would have reached retirement, but 1073 employees in mining would still be of working age, and for the power sector, the number would be 511. However, the specific impact of the transition would still have to await both the Labor Force Survey, as well as the details of the transition strategy, incl. PPC's plans for the future, as part of the work force may be re-assigned to new activities.

28. Direct stakeholders also include businesses which may directly benefit from the transition by e.g. the opening of new investment opportunities in sustainable energy or availability of government support to develop alternative employment opportunities for the workforce laid off. Since the phase-out strategy is not yet developed, such potentially direct or indirect stakeholders would at the moment mainly be listed under 'interested parties'.

29. **Indirectly affected** parties comprise large sections of the local communities and business communities in the Western Macedonia region and beyond, ranging from the mining communities and communities of workers in the power plants, beyond those personally affected, as well as local businesses predominantly relying on the catering to consumers of the above sectors. Because of PPC's dominant role in the Western Macedonian economy, the Labor Union of GENOP is perceived as representing not only the views of the immediate employees of PPC, but also of larger segments of the population, which are indirectly dependent upon PPC – and is also perceived as having considerable political clout in Western Macedonia.

### **3.2. Other interested parties**

30. Other interested parties and stakeholders are national and local government officials, community leaders, and civil society organizations, particularly those who work in or with the affected communities, as well individuals and groups from sectors which in the Transition Roadmap have been identified as having particular sectoral dynamics and recognized as having further growth prospects.

31. Indicative development sectors that may provide the potential for dynamic development of both individual and combined activities, thus generating positive multiplier effects. Western Macedonia designed its policy on RTDI (Research, Technological Development and Innovation) for the period 2014-2020 following the methodology of Smart Specialization Strategy (RIS3). In particular, the RIS3 priorities are energy - RES - district heating, integrated waste management, agriculture manufacturing and tourism,

comprising a mix of sectors and subsectors as follows:

- Agri-food (manufacturing - standardization of quality agricultural products - food / beverages);
- Environment (energy - RES - district heating - metalwork - integrated waste management);
- Fur farming - leather products;
- Tourism.

32. The industrial-craft and storage-warehouse zones are developed in the area of the PPC's power plants, in all the institutional or institutional development of the industrial area, as well as in the urban areas of the urban and dynamic suburban centers of the Region.

33. In the above sectors there may be many actors who would be interested parties, and who potentially could experience positive impact of the post-lignite transition. Also beyond the region, such interested parties would be found – not only in the RES sector but also ETVA VIPE (Piraeus Bank Group) would also be among interested parties due to its engagement in the new Kozani Business Park.

### **3.3. Disadvantaged / Vulnerable Individuals or Groups**

34. Planning for the post-lignite transition, it is important to recognize that the ability to cope with and be included in the planned social change would differ significantly across various social and age groups in Western Macedonia. Those who may be more likely to be adversely affected by the impacts of post-lignite transition and/or more limited than others in their ability to take advantage of a potential benefits to be derived from the transition may be labelled as 'vulnerable' or 'disadvantaged' (The World Bank, Environmental and Social Framework: 2017: 103). Such individuals and groups are also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so (ibid). Hence, it is important to ensure that the stakeholder engagement strategy be socially inclusive also of the more vulnerable or disadvantaged sections of society.

35. In the Western Macedonia scenario, with the economy basically being a mono-industry, the most obvious disadvantaged group is young people. A staggeringly high youth unemployment rate, coupled with the region's historically high unemployment rate, have been further exacerbated by progressive downward employment adjustments in the coal value chain since the financial crisis of 2008. The unemployment rate in Western Macedonia in 2017 was 29.1% (Eurostat, 2018), the highest rate among the 13 Greek regions, far above both the national (21.5%). Almost half of unemployed have been out of work for more than 12 months, and almost 30% of unemployed have primary education or less, which makes them particularly vulnerable.

36. Youth unemployment as well as female unemployment are also major social issues in Western Macedonia, with potentially upwards of 70% unemployment in the 16-24-year age group, and women being 61% of all unemployed. To date, this group has not been represented through any of the existing stakeholder groups, and special measures will have to be put in place to reach out to and hear the voice of the youth regarding the post-lignite transition. Osebik et al. (2011) argue that post-mining regions should seek not only to enhance the quality of life but also provide special programs to involve youth in development, special incentives for well-educated people to remain in the area, and above all to involve them along with other groups in strategy building for regional development. As a number of authors have argued (Frank 2006; Checkoway et al. 1995), young people in post-mining regions would then be able to realize their potential for contributing to planning and come to be considered a valuable regional resource.<sup>11</sup>

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<sup>11</sup>Naja Marot, Barbara Černič Mali: Youth and Regional Development Participation in Decisions on Post-Mining Regions, in Wirth, Mali,

37. With regard to women, global experience shows that economic recession and economic transitions tend to have differential impact on men and women, mostly with women in more precarious positions. Therefore, it would be important to ensure consultation with women's interest groups specifically during the development of the post-lignite transition strategy to mitigate potential disproportional impacts in the future. At the national level, the General Secretariat for Gender Equality (GSGE) is the governmental agency mandated to plan, implement, and monitor the implementation of policies on equality between women and men in all sectors. At the regional level, however, there is currently no formal entity mandated with such responsibilities, so this SEP and Action Plan includes specific measures to identify and address youth and gender gaps during the post-lignite transition planning.

38. A specific challenge in Western Macedonia, addressed in the NECP, is the number of consumers affected by energy poverty (for example, 29 % of the population is considered unable to heat its household sufficiently). To tackle this problem, the NECP includes specific objectives and milestones along with the continuation of currently running schemes promoting energy efficiency for vulnerable households. The NECP also discusses the potential replacement of these measures by an "energy card" that could give vulnerable consumers the ability to choose how best to cover their needs.<sup>12</sup>

### **3.4 Stakeholders' Differential Interest, Influence and Power**

39. The broad range of stakeholder groups may have widely differing interests regarding the post-lignite transition strategy, and thus equally different motivation to engage in the dialogue about transition. For some groups, such as those currently earning their living in mining sector, the transition poses a direct threat to their livelihood, while others may view it positively as a development towards a greener West Macedonia relying on renewable energy resources. Others may fear losing markets in the mining sector, while other see new economic opportunities opening up through the transition strategy.

40. The stakeholder engagement strategy needs to factor in these differences in stakeholders' interests, motivation, influence and power in order to reach out and be inclusive of all relevant groups. To understand these differences, the following key questions can be helpful:

- What are the potential economic implications for them of the transition strategy? Is it positive or negative?
- What is the nature of the potential impact – employment, business, service provision, other?
- What is their current view on the transition? Is it based on good information?
- What is their ability to influence the decision-making regarding transition?
- What decision-making power do they have via-a-vis transition?

41. However, the answers are not straight-forward or simple. There may be opposing views between stakeholders in the utilization of lignite (for electricity) and stakeholders in the utilization of competitor technologies for the generation of electricity – particularly natural gas and renewables plus storage. But among the latter group, there may also be emerging differences around alternative views of the future

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Fischer (eds): Post-Mining Regions in Central Europe. Problems, Potentials, Possibilities. Oekon, München, 2012.

<sup>12</sup> COMMISSION STAFF WORKING DOCUMENT, Assessment of the National Energy and Climate Plan of Greece , *Accompanying the document*. Commission Recommendation on the draft integrated National Energy and Climate Plan of Greece covering the period 2021-2030 . EU, Bruxelles, 18.6.2019, p. 10

economics and climate change implications of such technologies, e.g. between those who champion natural gas and those who champion renewables plus storage. Alternative technology solutions would have different implications for the future economy and employment of Western Macedonia – in other words, the debate over post-lignite technology solutions has the greater implications for the future for the post-lignite transition and for the future of Western Macedonia.

42. Each group of stakeholders do not necessarily represent one, uniform position on the post-lignite transition – e.g. the private sector would clearly comprise competing interests in the power sector, and similarly different perspectives would be represented across academia. Even internally in PPC there are different interests represented, since PPC’s current power portfolio consists of conventional thermal and hydroelectric power plants, as well as RES units. PPC is active in the RES sector through its subsidiary company “PPC Renewables S.A.” (PPCR), with a portfolio of wind farms, small scale hydroelectric plants and photovoltaic plants of total installed capacity of 116 MW (excluding the plants that PPCR participates through joint ventures).

43. Figure 01 identifies the main stakeholders of the post-lignite transition and other interested parties. The level of interest, relative influence and general position on the post-lignite transition of the main stakeholders are roughly indicated in the following categories: Very Low-Low- Medium-High-Very High – on the basis of interviews, workshops and meetings, and other available evidence. Where available, it is also indicated what may be the main drivers for different stakeholders to engage in the strategic discussions related to post-lignite transition.

**Table 01: The Stakeholders in Post-Lignite Transition**

<b>Direct Stakeholders</b>				
<b>Lignite Production Companies &amp; Labor Unions</b>				
<b>Stakeholder</b>	<b>Activities</b>	<b>Employment factor/economic impact</b>	<b>Level of interest, influence and position</b>	<b>Remarks</b>
<b>Public Power Corporation S.A. (PPC)</b>	Assets in lignite mines, power generation, transmission and distribution.	2500 jobs in lignite mines and 1400 jobs in lignite-fired power plants in WM	Very High Interest Very High Influence	PPC’s current power portfolio accounts for approximately 68% of the total installed capacity in the country.
<b>Mining-Technical-Trade S.A. (METE)</b>	Lignite production in privately owned mines.	60 jobs in mining	Very High Interest Limited Influence	Supplier to PPC Power plants. Also, sub-con-tractor to PPC
<b>Lignite Mines of Achlada S.A.</b>	Lignite production in privately owned mines	500 jobs in lignite mines	Very High Interest Medium Influence	Supplier to PPC Power plants
<b>GENOP-DEH</b> 2nd tier union of 27 member unions nationally, of which 6 from Western Macedonia	GENOP-DEK is the PPC’s main labor union at national level	App 3200 members	Very High Interest Very High Influence	Already part of consultations w WWF re Just Transition. Re-presenting labor unions in negotiations with PPC

<b>General Confederation of Greek Workers (GSEE).</b> The highest, tertiary trade union body in Greece made up of 83 worker unions and 74 departmental secondary confederations.	GSEE is. Its prime purpose is defending the interests of all workers in the private sector. It negotiates the with the employer unions at national level, and can call all workers of the private sector on strike in case the need arises.	Membership app. 450.000	High Interest Very High Influence	Protection of interest of organized laborers
<b>Spartakos</b> (a workers union) – member of GENOP	Labor union for workers (PPC) at a regional level (Western Macedonia) – 1/3 in power sector and 2/3 in mining	80% of GENOP-DEH's 3200 members belong to Spartakos	Very High Interest Medium Influence	PPC's main labor union – protection of members' interest.
<b>Labor Union Working Solidarity</b> (a workers' union) – member of GENOP	Small labor union	200 members -150 in mining 50 in power	Very High interest Low influence	All members are PPC workers
<b>Labor Union of Technical Engineers</b> (a sectoral union) – member of GENOP	Small labor union	320 members	Very High interest Low Influence	All members are PPC workers
<b>Labor Union Lygkistis</b> (a workers' union) – member of GENOP	Small labor union	225 members	Very High interest Low Influence	All members are PPC workers
<b>The Union</b> (a workers' union)– member of GENOP	Members in mining, power and adm – but majority miners	480 members	Very High interest Low Influence	All members are PPC
<b>Local Committee Number 12/PPC- West Macd</b> (a sectoral union) – member of GENOP	Small labor union	180 members (engineers)	Very High interest Low Influence	All members are employed in PPC and satellites
<b>SEN Union of Temporary Workers</b> (a workers' union)	Small labor union for temp. workers which work on 8 months' contract each year.	Small union – membership not known	High Interest Very Low Influence	Members hired by PPC workers
<b>Indirect Stakeholders</b>				
<b>TENA S.A., Ptolemais</b> (group of companies)	Construction company, excavation and transport in 4 mines	185 jobs 225 jobs sub-contracted	Very High interest Low Influence	Partly dependent on PPC
<b>GAIA Technical S.A., Ptolemaida</b>	Mineral extraction works constructions	50-99 employees	Very High interest Low Influence	Complete dependency on PPC
<b>KAPA Dynamiki S:A., Florina &amp;Ptolemais</b>	Construction company, mineral works, roads, buildings, mechanical works	65-80 jobs 100 sub-contracted jobs	Very High Interest Low Influence	80% dependency on PPC
<b>ELIKA A.T.E.E.S.A., Kozani</b>	Construction of infrastructure		Very High interest Low Influence	Complete dependency on PPC
<b>ERGONSAS S.A., Kozani</b>	Mineral extraction works - constructions		Very High interest Low Influence	Complete dependency on PPC
<b>KYBOS S.A., Kozani</b>	Industrial services - constructions		Very High interest Low Influence	Complete dependency on PPC
<b>MPETOKAT S.A., Ptolemais</b>	Mine exposure - constructions		Very High interest Low Influence	Complete dependency on PPC
<b>SOTTRUCKS,</b>	Truck repair, maintenance		Very High interest	Complete

<b>Ptolemais</b>	services		Low Influence	dependency on PPC
<b>VIER, S:A., Kozani</b>	Construction company/industrial services, maintenance	300 jobs 200 jobs sub-contracted	Very High Interest (worried) Low Influence	Complete dependency on PPC
<b>Polytechniki, S.A., Ptolemais</b>	Metal works		Very High interest Low Influence	Complete dependency on PPC
<b>Vita S.A., Ptolemais</b>	Electrical and industrial installations	70 jobs	Very High interest Low Influence	Complete dependency on PPC
<b>Mete , Mining-technical- trade S.A S.A., Florina</b>	Sub-contracting trucks and excavators	75 jobs	Very High Interest (worried) Low influence	Complete dependency on PPC. Also directly engaged in private mining
<b>Greece 2028 Observatory</b>	Association of 23 sub-contractors (technical and construction) to PPC.	Estimated 1500 jobs	Very High Interest Low Influence	Varying levels of dependency on PPC among member companies
<b>Numerous small sub-contractors</b>	Provision of different services to PPC SA (e.g. catering, cleaning, waste disposal)	500 jobs	High Interest Very Low Influence	High dependency on PPC
<b>Numerous suppliers to PPC SA</b>	Supply of various material inputs to PPC S.A.	Not known	Medium Interest Very Low Influence	Varying levels of dependency on PPC among member companies
<b>Government</b>				
<b>Ministry of Finance</b>	Overall financial policy.		High Interest High Influence	
<b>Ministry of Environment and Energy</b>	Protection of the natural environment and resources; Mitigation and adjustment to the implications of climate change		Very High Interest Very High Influence	
<b>Ministry of Development and Investments</b>	Responsible, i.a. for the Multi-annual Financial Framework for the years 2021-27, currently under negotiations with EC		Very High Interest Very High Influence	Key stakeholder regarding the financial support for the energy transition
<b>Ministry of Labor and Social Affairs</b>	Labor and social legislation and policy.		Medium Interest Medium Influence	
<b>Region of Western Macedonia</b>	Administratively a secondary governmental organization. Geographically covers the whole of Western Macedonia		Very High Interest High Influence	
<b>Union of Municipalities of Western Macedonia</b>	Plays a political, coordinating and developmental role for municipalities		Very High Interest Medium Influence	
<b>Regional Operational Program of Western Macedonia Managing Authority</b>	Responsible for the Regional Operational Program (ROP)		High Interest Medium Influence	
<b>Region of Western Macedonia</b>	Administratively a secondary governmental organization. Geographically covers the		Very High Interest High Influence	

	whole of Western Macedonia			
<b>Network of Energy Production Municipalities</b>	Kozani Florina Amyntaio Eordaia		High Interest  Medium Influence?	The four municipalities in Western Macedonia that have lignite mines and lignite-fired power plants
<b>Centre for Renewable Sources and Saving (CRES)</b>	CRES is the national entity for the promotion of renewable energy sources, rational use of energy and energy conservation. CRES is a public entity supervised by the Ministry of Environment and Energy.		High Interest Medium Influence	
<b>Hellenic Transmission System Operator ( HTSO) &amp; Regulatory Authority for Energy (RAE) The Operator of Electricity Market (OEM)</b>	The liberalized electricity market is operated by the Hellenic Transmission System Operator (HTSO) and is supervised by the Regulatory Authority for Energy (RAE), which also supervises the OEM. OEM operates the process of the exchange between electricity producers and electricity consumers		High Interest Medium Influence	
<b>Chamber of Commerce and Business, Florina</b>	Organization of local businesses and companies with a focus on development of the interests of local companies and businesses		High Interest  Medium Influence?	
<b>West Macedonia Development Company (ANKO) SA</b>	Established by the local authorities, the State, the agricultural cooperatives and Chambers of Commerce, in order to act as a pioneering scientific organization for the regional development approach		High Interest High Influence? Medium	
<b>The European Union</b>			Medium Interest Medium Influence	EU legislation and policy plays a major role in decarbonisation across EU as part of climate policy

Other interested parties	Interest in the project
<b>Technical Chamber of Greece/ Dept. of WM</b>	Active members (engineers) employed in industry, construction, consulting, public services. Interest from a technological, economic and political perspective.
<b>Kozani Chamber of Commerce and Industry</b>	Interest focused on the impact of the local economy



<b>Chamber of Commerce and Business, Florina</b>	
<b>West Macedonia Development Company (ANKO) SA</b>	Interest in overall regional development
<b>Hellenic Association of Photovoltaic Companies (HELAPCO) Hellenic Wind Energy Association (ELETAEN)</b>	Interested in de-carbonisation and subsequent investment opportunities for RES
<b>DIADIMA / EPADYM Waste Treatment Plant</b>	Interested in establishment of a Circular Economy Park, focusing on waste materials recovery, utilization and management and based on the co-operation of research forces with local businesses to produce innovative products.
<b>Tourism Agency of Western Macedonia</b>	Interest in tourism investments following repurposing of mining areas.
<b>Kozani Saffron Cooperative Agricultural Cooperative of Aromatic, Pharmaceutical and Plants and Fruit-Vegetables of Voio Kozani</b>	Interest in investments in new economic activities following de-carbonization
<b>Institute of Greek Fur</b>	Interest in investments in new economic activities following de-carbonization
<b>University of Western Macedonia National University of Athens</b>	Interest based on a research and technological and political/economic perspective
<b>Centre for Research and Technology, Hellas (CERTH) Cluster of Bioenergy &amp; Environment of Western Macedonia (CluBE)</b>	Interest from a research and technological and political/economic perspective
<b>WWF, Western Macedonia Greenpeace Greece Green Tank Kozani Ecological Movement</b>	Active in campaign to have PPC's environmental permit (2016) annulled for failure to comply with EU laws. Interest in mine closure and promotion of RES solutions.
<b>Local and national media (print and electronic media)</b>	Interested based on the significant socio-economic and political impact of the transition.

### 3.5. Summary of project stakeholder needs, level of interest and potential influence

44. In Table 02 below 13, stakeholders are grouped together according to shared, similar characteristics. For each stakeholder group an estimated Saliency rating has been assigned, indicating the level of importance and priority the stakeholder is assessed to attach to the post-lignite transition issue. The rating has been given numerical value in the range of 0-100:

Very Low = 0, Low= 25, Medium= 50, High= 75, Very High= 100

45. Each stakeholder group has also been assigned an Influence rating, likewise in the range 1-100, indicating the level of resources and power each stakeholder group is assessed to hold, relevant to the issue of post-lignite transition.

<sup>13</sup> The following stakeholder analysis is based on N.Narayanan & S. Ndegwa: "Simplified Stakeholder Analysis: A Demonstration" (PMMPs, WB, ppt)

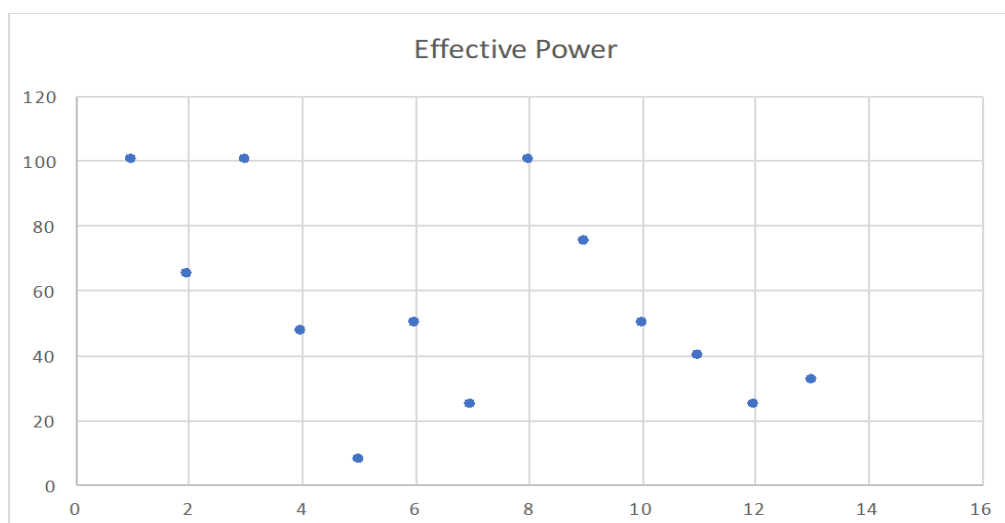
46. The different stakeholder groups obviously differ significantly in terms of their active engagement in the lignite transition as well as in their ability to influence the outcome of the political process related to post-lignite transition. And finally, how effective each stakeholder group can be in promoting his/her position regarding post-lignite transition is calculated as the weighted sum of 70% Influence and 30% Saliency (ibid 14). Influence is weighted higher than Saliency, since an influential stakeholder has more power to block or push a reform, than less influential stakeholder.

**Table 02 Effective power of various Stakeholder Groups**

<b>ID</b>	<b>Stakeholder group</b> (stakeholders of similar characteristics and often common objectives)	<b>Saliency-level of engagement in issue</b>	<b>Influence - level of resources and power in relation to issue</b>	<b>Effective Power</b>
1	PPC mining and power	100	50	100,00
2	Other mining companies	100	25	65,00
3	Labor Unions	100	50	100,00
4	Unorganized labor in mining/power sector	100	25	47,50
5	Unemployed groups	25	0	7,50
6	Subcontractors/Construction	50	25	50,00
7	Subcontractors/Services	25	25	25,00
8	National government	100	100	100,00
9	Local government	75	75	75,00
10	Local & national businesses, financing institutions	50	50	50,00
11	Civil society/NGOs	75	25	40,00
12	Academia	25	25	25,00
13	Local and national media	50	25	32,50

**Figure 03: Distribution of Effective Power Among Stakeholders**

<sup>14</sup> (.70)\*I + (.30)\*S = Effective Power (Narayanan & Ndegwa, op. cit.)



47. While the majority of stakeholders at this point of time may be opposed to the post-lignite transition, the stakeholders in favor of the transition hold, notably the national and local government, have considerably more effective power to promote the concept of de-carbonization. Never-the-less, the opposition to the de-carbonization may still be quite significant, which means that for the government a peaceful and successful transition will require comprehensive consultations and dialogue with the major direct stakeholders, i.e. part of the PPC, other mining companies and not least the major labor unions.

#### IV. Stakeholder Engagement Program

48. With the 2010 revision of the Standing Orders of the Parliament, every proposed legislation submitted must also be accompanied by a report on the results of the public consultation that took place prior to this submission. The online consultation platform, <http://opengov.gr>, is operated by The National Centre for Public Administration and Local Government; and is used to engage citizens and organizations in discussions on issues of public interest, such as legislative acts and public policies. Almost every piece of draft legislation and policy initiative is posted in a blog-like platform prior to submission to parliament. Citizens and organizations can post comments, suggestions and criticisms article-by-article. When the time limit for the consultation expires (normally a minimum of 30 days), the Ministry processes the citizens' comments by drafting a report on the public consultation. When the adopted law and the report on the results of the consultation are published, the consultation is considered complete.

49. The development and implementation of the post-lignite transition will go beyond these basic disclosure and consultations requirements, and its overall communications strategy will comprise a strategy for information disclosure, as well as for consultations.

50. Beyond this legal framework for consultation, issues of specific local interest are being discussed at the Provincial Council and Municipal Council meetings, which take place at least monthly and are open to the public.

##### 4.1. Purpose and Timing of Stakeholder Engagement Program

51. The main purpose of the stakeholder engagement program is to ensure informed decisions regarding the Post-lignite Transition Roadmap that are inclusive of the views of impacted workers and communities, industry, local and national government, private sector and financing institutions, donors, and non-

governmental organizations - and which are also inclusive of particularly vulnerable groups among the impacted population and interested parties. In addition, the stakeholder engagement plan will also aim to **establish contacts and foster dialogue** across the diverse stakeholder group including:

- (a) mines and enterprises along the coal value chain across the Kozani – Ptolemais – Florina region;
- (b) community leaders in directly and indirectly affected communities, Labor Union representatives and workers from affected mines and other enterprises;
- (c) the Greek State, the Region’s Government, the Energy Municipalities
- (d) the Public Power Corporation,
- (e) social and other development agencies and other institutions,
- (f) private sector and financial institutions with interest in the transition strategy, and
- (g) non-governmental organizations, and public participation groups active on coal mining and clean energy initiatives. A special effort will ensure that also the views of vulnerable groups like youth and women are being heard and taken into account.
- (f) media, which has an important role in ensuring dissemination of information and transparency.

52. **Continuous stakeholder engagement** is a crucial element of all the stages of planning and implementation of the Transition Strategy. A case in point is the spatial planning process, where stakeholder engagement involvement is an important determining factor in the quality and sustainability of the final plans. Consultations should specifically target the linkage with spatial planning processes and existing plans for the external lands, both on regional and local levels, and should solicit input and ideas from a wide range of stakeholders, including e.g. business associations, farmers’ unions, environmental organizations, trade unions, producers and distributors of energy and water, etc. Guiding questions for the stakeholder engagement in the context of spatial planning could relate to making land available for specific development concepts, for optimizing transmission / utility lines, making mine installations and infrastructure available for subsequent uses, creating space for projects of public interest, and securing broad consent for the general spatial organization of the lands. To sum up, maintaining consistent stakeholder engagement across various constituencies at the national and local level is critical to ensuring the maximum level of buy-in from all parties to the final Road Map.

### Box 3

In the Czech Republic, The Strategic Framework and the Implementation Framework were prepared expertly. A small expert team was formed for each pillar to propose the content of the thematic pillar drawing on previous experience, including that from abroad, the results of the initial problem analysis, and knowledge of interventions in the relevant area in the Czech Republic. (.....) Ad hoc consultations regarding the proposals for the individual pillars and for the Strategic Framework as a whole were held with public institutions, research organizations and representatives of the business sphere in all three regions. (.....)The comments, recommendations and conclusions from these consultations were continuously incorporated in the draft Strategic Framework. ...The Strategic Framework was also discussed at two meetings of the Working Party on Restructuring..... The comments, recommendations and conclusions of the Working Party on Restructuring were also incorporated in the proposals for the individual pillars and their objectives and measures.

A number of stakeholders both from the individual regions and at the national level were involved in the preparation of the Strategic Framework. It is therefore by no means a document drafted “at the desk” as the document has been widely discussed. (Source: *Strategic Framework for the Economic Restructuring of the Ústí nad Labem, Moravian-Silesian and Karlovy Vary Regions*, p. 8, Ministry of Regional Development of The Czech Republic

53. During the strategy development, the consultations on the Roadmap have already been initiated and have so far covered (i) kick off workshop and stakeholder consultations in Kozani (February 2019); (ii) presentation of work to date and methodology to PPC leadership and Ministry of Environment and Energy in Athens (April 2019); technical feedback sessions on methodology on land classification and land use as well as the outline for a regional economic development strategy in Athens and Kozani (June 2019). These workshops have been complemented by consultations with different sets of stakeholder groups in view of each component, ranging from PPC, Labor Unions, PPC sub-contractors, to ANKO, Coal Platform, Local Government and various interest groups.

54. The Prime Minister’s announcement of the closure of the lignite mines and associated power plants in Western Macedonia by 2028 caused extra-ordinary municipal council meetings in the energy municipalities as well as extraordinary Provincial Council meetings, very well attended by the public and where a long and lively discussion ensued. The subsequent announcement of closure of most lignite mines and all power plants except Ptolemeida V by 2023 added further urgency to the local debate.

55. In addition, a skills survey will be conducted to contribute to a smooth transition out of the coal value chain in Western Macedonia with a focus on documenting the anticipated labor and social impacts from closure of lignite mines and decommissioning of plants and a view on managing reallocation and reskilling of workers. The survey will be disaggregated by sex and age and include questions attitudes towards the post-lignite transition, and perceptions of own ability to influence process..

#### 4.2. Proposed Strategy for Consultation

56. Attention would be paid to find approaches and means to ensure outreach and active engagement of particular vulnerable groups such as youth, women and other groups not proportionally represented among existing interest groups. Existing consultative fora and approaches will be further mapped and assessed for their utility in the consultation strategy.

**Table 03: Stakeholder Engagement Implementation Plan**

Project stage	Topic of consultation	Consultation Method used	Location and dates	Target stakeholders	Responsible officer
<b>Phase 1 (2020-2023)</b>					
<b>Strategy Development</b>	Draft “Land use and spatial planning “	<ul style="list-style-type: none"> <li>• Workshop with key stakeholders</li> <li>• Local Radio &amp; TV coverage</li> <li>• Publication of draft “Land use and spatial planning”</li> <li>• Disclosure on official websites</li> <li>• Press releases</li> </ul>	Kozani Athens	National government Local government PPC mining and power Other mining companies Subcontractors/Construction & Services Labor Unions Local businesses Civil society/ NGOs Academia Media	NET/Communication and External Relations Unit
<b>Strategy Development</b>	Draft “Transforming Western Macedonia into an “Alternative Energy and Energy Storage Hub””	<ul style="list-style-type: none"> <li>• Workshop with key stakeholders at local and national level</li> <li>• Local Radio &amp; TV coverage</li> <li>• Publication of draft “Transforming Western Macedonia into an “Alternative Energy and Energy Storage Hub””</li> <li>• Disclosure on official websites</li> <li>• Press releases</li> </ul>	Kozani Athens	National government Local government PPC mining and power Other mining companies Subcontractors/Construction & Services Labor Unions Local businesses Civil society/ NGOs Unorganized labor in mining & power Unemployed Academia Media	NET/Communication and External Relations Unit
<b>Strategy Development</b>	Draft Transition Strategy	<ul style="list-style-type: none"> <li>• A series of workshops with stakeholders at local and national level</li> <li>• Publication of draft “Transition Strategy”</li> <li>• Local and National Radio &amp; TV coverage</li> <li>• Disclosure on official websites</li> <li>• Press releases</li> </ul>	Kozani Athens	National government Local government PPC mining and power Other mining companies Subcontractors/Construction & Services Labor Unions Local businesses Unorganized labor in mining & power Unemployed Civil society/ NGOs Academia Media	NET/Communication and External Relations Unit

<b>Strategy Development</b>	Plans for closure of mines and power plants (Agios Dimitrios, Amynteo, Meliti, units at Kardia, Megalopoli)	<ul style="list-style-type: none"> <li>• A series of workshops with direct stakeholders (PPC, Labor Unions, PPC sub-contractors)</li> <li>• Public Consultation meeting with other local stakeholders</li> <li>• Local and National Radio &amp; TV coverage</li> <li>• Disclosure on official websites</li> <li>• Press releases</li> </ul>	Meetings at each mining and power unit with affected employees  Kozani	PPC mining and power units Other mining companies Subcontractors/Construction & Services Labor Unions Local businesses Unorganized labor in mining & power Local government Unemployed Civil society/ NGOs Academia Media	NET/Communication and External Relations Unit
<b>Phase 2 (2023-2028)</b>					
<b>Strategy Implementation</b>	Semi-annual reporting on implementation of each component of the Transition Strategy	<ul style="list-style-type: none"> <li>• Disclosure on official websites</li> <li>• Local and National Radio &amp; TV coverage</li> <li>• Press releases</li> </ul>	Kozani Athens	National government Local government PPC mining and power Other mining companies Subcontractors/Construction & Services Labor Unions Local businesses Unorganized labor in mining & power Unemployed Civil society/ NGOs Academia Media	NET/Communication and External Relations Unit
<b>Strategy Implementation</b>					
<b>Strategy Development</b>					
<b>Strategy Implementation</b>					

### 4.3 Proposed Strategy for Information Disclosure

57. The Greek Government has initiated a major initiative within the area of access to public information implemented by the Ministry of Interior and Administrative Reconstruction through the establishment of the Clarity website<sup>15</sup>. Henceforth, the decisions of public entities cannot be implemented if they are not uploaded on the Clarity website, and unless each document is digitally signed and assigned an automatic transaction unique number. Clarity covers all public institutions, regulatory authorities and local government. For the first time in Greece, the Clarity programme introduces the obligation to publish all the

<sup>15</sup> [https://joinup.ec.europa.eu/sites/default/files/inline-files/Digital\\_Government\\_Factsheets\\_Greece\\_2019.pdf](https://joinup.ec.europa.eu/sites/default/files/inline-files/Digital_Government_Factsheets_Greece_2019.pdf)

decisions on the Internet, with the exception of decisions that contain sensitive personal data and/or information on national security.

58. The principle of transparency in all areas of public life, including media, is expected to be enhanced given that there is an Action Plan Promoting Open Government since 2014 (*Greek Action Plan 2014-16*). The government’s Action Plan for Open Public Administration comprises commitments structured in three main directions (i) Encouraging public participation; (ii) Open public data; and (iii) Integrity and accountability.

59. The national opengov.gr platform may be copied for setting up a similar system by the provincial government, but it would be supplemented by other approaches to disclosure to ensure to ensure broad information sharing across the socially diverse stakeholder group.

**Table 04: Information Disclosure Plan**

<b>Project stage</b>	<b>Information disclosed</b>	<b>Mode of disclosure</b>	<b>Timetable</b>	<b>Responsible in charge</b>
<b>Phase 1 (2020-2023)</b>				
Strategy Development	Draft “Land use and spatial planning “	Official Clarity website, Provincial government Website		NET/Communication and External Relations Unit
Strategy Development	Draft “Transforming Western Macedonia into an “Alternative Energy and Energy Storage Hub””	Official Clarity website, Provincial government Website		NET/Communication and External Relations Unit
Strategy Implementation	Draft Transition Strategy	Official Clarity website, Provincial government Website		NET/Communication and External Relations Unit
Strategy Implementation	Final Transition Strategy	Official Clarity website, Provincial government Website		NET/Communication and External Relations Unit
Strategy Implementation	Plan for mining & power plant closure	Direct correspondence to affected employees Official Clarity website, Provincial government Website		NET/Communication and External Relations Unit
Strategy Implementation	Revised ESIA (?)	Official Clarity website, Provincial		NET/Communication and External



		government Website		Relations Unit
Detailed individual plans for mine and power plant closures	Details of closure and implications for individual employees	PPC website, announcement at each mine & power plant, individual information to each employee		NET/Communication and External Relations Unit
<b>Phase 2 (2023-2028)</b>				

#### 4.4 Proposed Communication Strategy

60. An important aspect of the SEP is the overall **public communication strategy** regarding the Just Transition Strategy. Since this is a diverse and specialized field, it may be advisable to contract an external PR firm to assist in development and delivery of the public communication regarding the Just Transition Strategy. However, the overall SEP as an integral part of the overall Transition Strategy should be managed internally, as a key aspect of Transition, to ensure both stakeholder understanding, inclusion and confidence, as well as ensuring accountability and the transparency of the process.

61. The overall objectives of the communication strategy are:
- To promote the public understanding of the post-lignite transition in a coherent, consistent manner, reaching all sections of the population in Western Macedonia, and relevant stakeholders at national level.
  - To ensure that the key messages are communicated consistently and coherently.
  - To strengthen understanding of the post-lignite transition through interactive communication processes resulting in increased public/ community awareness, engagement and participation in developing and implementing the transition strategy.
  - To foster two-way and interactive communication building a culture of transparency and accountability and trust that stakeholders' concerns are being heard and addressed.

62. In order to achieve these objectives, a multi-media and communication approach should apply a mix of diverse face-to-face, print and electronic media channels. The Communications strategy may use advertisements, interactive Radio and TV programs, newspaper articles, in addition to the direct communication in the form of the above series of stakeholder consultations on different topics at various stages of the strategy development and implementation.

63. Traditional institutional communication focuses primarily on information products intended for mass dissemination. It is a vertical form of communication, which does not allow for a real dialogue. Communication for development facilitates communication processes. It is a horizontal form of communication, which promotes dialogue and exchange within projects and programs. It is not so much a communication discipline as a task shared between development specialists and communicators (see graphic below). 16

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<sup>16</sup> Communication for Development. A Practical Guide. SDC, Bern, July 201

**Table 05: Institutional Communication vs. Communication for Development**

Aspect	Institutional Communication	Communication for Development
Model	Vertical, top-down,	Horizontal
Direction	One-way	Two-way/Multidirectional
Approach	Products	Processes
Contents	Information, cognitive/intellectual messages	Information and emotion, sensory messages
Main Focus	Institutional image	Social and political incidence
Channels	Printed matter, web, e-newsletters, conferences	Public events, community media, social media/multimedia
Responsibility	Communicators, heads of agencies	Task shared between development experts and communicators

Source: op.cit.

64. Dialogue is the most appropriate word to summarize the concept of communication for development. In this respect it is very different from institutional communication, which delivers one-way information to a dispersed target audience. In contrast, communication for development targets specific groups of people in a clearly defined social and cultural environment in order to identify their concerns and needs and foster their participation. An important aim of the process is to promote social participation, strengthen the sense of ownership of a project and hence its impact. Experience shows that dialogue is more conducive to changes in behavior and attitudes than one-way guidance and information – and in the context of the anticipated major socio-economic impact of the post-lignite transition in Western Macedonia, the participation and commitment of the different stakeholder groups will be vital for reducing the tensions and socio-economic and political upheavals as a result of the transition process.

65. The communication strategy, inclusive of stakeholder consultations, thus leverages the social and political impact of a project and as such requires close cooperation and an effective division of tasks between technical experts and communication specialists. The former identifies the messages and topics for debate, while the latter determine the tools for dissemination and spaces for dialogue (op.cit.).

66. The communication strategy thus comprises four tasks:

- **Facilitating access to information and knowledge:** People who have limited access to knowledge and information are limited in their agency vis-à-vis socio-economic changes and challenges. E.g. although all the decisions of public entities have to be disclosed and be subject to formal consultations on the official government website, that in itself does not guarantee, that broad stakeholder groups have been informed and understand the implications of the Transition Strategy. What is of paramount importance is that the communication processes be socially inclusive and easily accessible.
- **Promoting participation:** Being able to take part in the decisions that affect one’s life is a basic right of every citizen. Projects and policies planned and implemented with the involvement of the population have a higher degree of ownership by the latter and are therefore more lasting and sustainable. The communication strategy will facilitate the stakeholder consultation and overall

dialogue between citizens and the local, regional or national authorities and as such is essential for the post-lignite transition process. The public hearings can be complemented by debates, radio forums and online information-sharing platforms.

- **Giving voice to the excluded:** The concerns and aspirations of less advantaged social groups – people living in poverty, women, young people – are often excluded from the national debate, although they constitute a majority of the population. The communication strategy shall enable excluded groups to make their voice heard and take part in the national dialogue.
- **Influencing public policies:** The ultimate goal is to influence public policies, reforms and new progressive legislation by facilitating an informed public ability to partake in discussions and identification of solutions to problem that affect the population.

#### **4.5 Proposed Strategy to Incorporate the View Of Vulnerable Groups**

67. In the present context, the identified ‘vulnerable groups’ are unemployed youth and women as well as ‘energy poor households’, unable to afford sufficient heating of their households. The local employment agency (OAED Kozani) has a record of registered unemployed persons, but very limited outreach and contact to these. However, the OAED could still be requested to assist in contacting the unemployed stakeholders and try to engage them in consultation meetings. Likewise, local sports clubs and Women’s clubs can be used to reach these target groups.

68. Throughout the transition process, it would be important to arrange special outreach to young people, since their commitment and engagement in the transition process is vital for the region. West Macedonia not only has the large unemployment rate in Greece, but also the largest out-migration of young persons, thereby losing its labor force. Reaching the youth would involve close cooperation with the educational institutions of the region, youth and sports clubs as well as the OAED (employment agency), and any other organization/association targeting youth.

### **v. Responsibilities for Implementing Stakeholder Engagement Activities**

#### 5.1 Management functions and responsibilities

The proposed overall governance/implementation structure for the Just Transition is outlined below:

## Governance Arrangements: Recommendations – Governance Structure Phase 1



An **Inter-Ministerial Committee for Just Transition** has been established by the Ministry along with a **Steering Committee**, under which the **National Executive Team (NET)** will be set up. The NET will advise and draft the transition plan for the Steering Committee, which will forward it to the Inter-Ministerial Committee for approval. The NET is responsible for day-to-day management and will include the units, which will be staffed with non-civil servants:

- Executive Director
- Deputy Director
- Units for the different technical work-streams corresponding to the Strategy
- Communications and External Relations Unit

The NET HQ is in Athens and it is proposed to have a regional presence as well, with staffing according to the technical work streams and Communication and External Relations.

The **Communications and External Relations Unit** in the NET will manage the Stakeholder Engagement Program and Communication Strategy, including managing disclosure of documents as well preparing the documentation and reporting on the consultation outcomes to the NET management and upwards to the Steering Committee. (See Annex 1 for Consultation Guidelines). The Communication and External Relations Unit will also be responsible for reporting back to stakeholders (e.g. uploading and disclosure of minutes and decisions on Just Transition website and dissemination wherever else is deemed relevant).

Feedback from public consultations can take the following forms: (i) detailed minutes from all public consultations with list of participants, all questions and concerns listed, along with any responses provided. (ii) Comments/questions/issues posted on-line on NET website in connection with consultations on specific strategies and plans (see response template in Annex 2). See also Data Protection Information, which will be displayed at the Just Transition website

in connection with each public consultation (Annex 3).

While Stakeholder Engagement Strategy should be managed directly by the NET, it may choose to contract a private PR firm to handle the Communication Strategy in terms production of information materials (electronic and print) on Just Transition, and assisting with messaging via social media and mass media in general (see Section 4.4. above).

## 5.2 Guidelines for a Grievance Redress Mechanism

To further strengthen accountability of the post-lignite transition process, a Grievance Redress Mechanism (GRM) will also be managed by the Communications and External Relations Unit of the NET through a dedicated GRM Section. separate. It will provide an additional channel for stakeholders and citizens at all levels to lodge complaint or raise a specific grievance, for which they request redress. Where NET responses to issues raised during consultations are of general nature, the specific grievances submitted will subject to individual and specific response by NET. The GRM will thus allow for the identification and impartial, timely and effective resolution of issues directly affecting the citizens as a result of the transition.

Having an effective GRM in place will also serve the objectives of reducing conflicts and risks such as external interference, social exclusion or mismanagement - and serving as an important feedback and learning mechanism for management of the transition strategy regarding the strengths and weaknesses of procedures and implementation processes.

The GRM will include the following:

- (a) Different ways in which users can submit their grievances, which may include submissions in person to a regional NET office, by phone (dedicated hotline no. xxxxx), e-mail to NEC (xxxx@xxxx.com) or via NEC web site. Grievance Form included in Annex 4;
- (b) The Communications and External Relations Unit of NET will register all grievances submitted via the different uptake channels, and will maintain a database over grievances;
- (c) NEC will publish on the Just Transition website the details of GRM structure and procedures, including information about the service standards, i.e. the length of time users can expect to wait for acknowledgement, response and resolution of their grievances;
- (d) Appeals process (including the national judiciary) available for dissatisfied complainants.

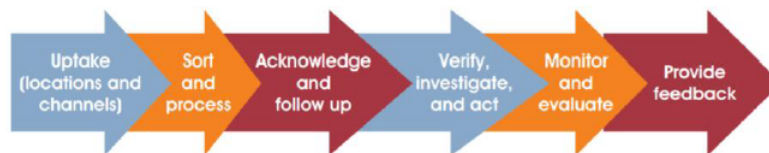
*Structure.* The complaints and grievances will be addressed by the **Grievance Redress Committee (GRC)**, composed of Dep. Director (NET), heading the GRC, 1 representative from GRM Section/NET, 1 representative the Special Purpose Vehicle (see Just Transition Governance structure), 1 representative from the Regional Council, and 1 representative from Regional Civil Society organizations.

*Communication.* Information about the project's GRM will be publicized as part of all stakeholder consultations, and information about the GRM will also be posted online on the Transition website. Brochures should be distributed during consultations and public meetings, and posters will be displayed in public places.

A summary of the implementation of the grievance mechanism should be provided on quarterly basis on the Just Transition website, after removing identifying information on individuals to protect their identities

*Process.* The overall process for the GRM will comprise of 6 steps: (1) uptake (2) sorting and processing (3) acknowledgment and follow up (4) verification, investigation and action (5) monitoring and evaluation and (6) feedback (see Fig. 4).

**Figure 4. Feedback and GRM Process**



*Source: Agarwal, Sanjay and Post, David. 2009. Feedback Matters:*

*Designing Effective Grievance Redress Mechanisms for Bank-Financed Projects – Part I. SDV. World Bank.*

Step 1: Uptake. Stakeholders will have the opportunity to provide feedback and report complaints through dedicated hotline and project website. (See Grievance Form in Annex 4)

Step 2: Sorting and Processing. To consolidate, monitor and report on information related to grievances, complaints and feedback related to the transition strategy & implementation will be documented upon receipt/communication, and recorded in the central GRM database, where the grievance and its resolution will be recorded and classified for monitoring purposes and to facilitate feedback regarding transition strategy & implementation and analysis of grievances and functionality of the GRM.

Step 3: Acknowledgement and Follow-Up. The complainant will within 24 hours of submitting a complaint/grievance receive acknowledgement of receipt with a tracking number, and an indication of when a response/resolution can be expected.

Step 4: Verification, Investigation & Action. Verification and investigation involves gathering information about the grievance to determine its validity and to generate a clear picture of the circumstances surrounding the issue under consideration. Complaints which may not fall within the jurisdiction of Just Transition Steering Committee will be channeled to the relevant authorities. However, the GRM Section will be keeping track of the progress of resolving such complaints and will include them in the quarterly report, since they are important for the overall public perception of the Just Transition outcomes.

In case of grievance, which can't find a satisfactory resolution by the GRC or through the other administrative channels, can as a last resort be referred to the judicial system or to the Greek Ombudsman (<https://www.synigoros.gr/resources/toolip/doc/2011/01/24/complaintform.pdf>), depending upon the nature of the complaint.

Step 5: Monitoring & Evaluation. Monitoring refers to the process of tracking grievances and assessing the extent to which progress is being made to resolve them. This is an important aspect of assessing the social outcomes of the Just Transition process.

Step 6: Providing Feedback. This step entails informing GRM users and the public at large about the results of investigations and the actions taken.

**Monitoring and Documentation:** The M&E function of the overall transition strategy development and implementation may potentially be carried out by a third-party implementer to ensure effective monitoring of grants and activity implementation. The third-party implementer will also cover external monitoring of the Stakeholder Engagement Plan and the Communication Strategy in terms of the stakeholders' perception and attitude towards the post-lignite strategy and their own involvement in this. The monitoring of the SEP and communication process will start with the initial Labor Survey which will contain attitudinal/perception questions as well, which will be conducted as baseline. Consecutive surveys will determine the socio-economic impact of the transition strategy on stakeholders and their respective perceptions and attitudes to the transition. The communication strategy incl. the M &E will cover the duration of the transition strategy implementation (i.e. Phase 1, Phase 2 and beyond).

\*\*\*\*\*

## Annex 1

### PUBLIC CONSULTATION GUIDELINES

#### The National Executive Team for Just Transition Strategy launches Public Consultation on the draft Just Transition Strategy

Dear Stakeholder,

The National Executive Team (NET) announces the consultation process on the draft Just Transition Strategy

In line with national regulations, NET invites you to submit comments and clarification questions that you might have by following the guidelines below.

#### 1. Documents to be consulted

Please provide your comments on the Just Transition Strategy. Please note that the [Supporting documents](#) are not part of this consultation, but they might provide you with more relevant information on the Just Transition Strategy.

#### 2. Duration of public consultation

You can submit comments and clarification questions, and the consultation document is accessible between xxxday/month//year/ hour until day/month/year/hour .

#### 3. Request for clarifications on the consultation process and potential technical issues

Clarification requests on the NET *consultation process* can be raised latest by day/month/year/hour by sending an email to xxxxxxxx@ xxx.com. The subject title of the

email should be “NET Just Transition Strategy *public consultation process / QUESTION PROCESS*”.

For any technical issues throughout the public consultation process, please send an email to the above email address with the subject title “NET Just Transition Strategy *public consultation / TECHNICAL ISSUE*”.

NET will respond via email within 24 hours of the received request. Please note, however, that NET reserves its right to only respond to the clarification queries and technical issues raised in relation to this consultation process and NET will not consider or respond to any request for clarification which does not directly related to the Just Transition Strategy consultation process.

#### **4. Submitting comments on the Just Transition Strategy**

When responding to this consultation, please use the [Response Template](#) and please follow these guiding principles:

- the response should be in English;
- the response should not be longer than 10 pages;
- as per the Response Template, comments in the response should be grouped per section and paragraph of the Just Transition Strategy;
- should additional documents be submitted together with the response, these will be considered as background materials, and NET will not have to consider any comments mentioned therein. Please send your response to xxxxxx@xxxx.com. with the subject title “NET Just Transition Strategy *public consultation process / COMMENTS.*” Please ensure a ‘read receipt’ is requested if you wish to confirm that your response has been received. No other confirmation will be sent.

#### **5. Confidentiality**

Should you wish to preserve the anonymity of your identity/company/institution and/or not disclose specific information from your response, please:

- tick the relevant box in the Response Template if you would like to keep the company name that you are representing confidential;
- tick the relevant box in the Response Template if you would like to keep your name and your contact details confidential;
- specify in the table of the Response Template whether you would like your comments to be kept confidential. If your comments are deemed confidential, and thus not made publicly available, NET reserves its right not to take them into consideration in the final assessment of the Just Transition Strategy. NET resorts to this measure, as the confidentiality comments would not foster transparency on why specific changes have possibly been made to the Just Transition Strategy. Please note that NET will, however,



send the confidential version of all the received comments to the relevant authorities.

## 6. Data protection

Please note that NET will be processing the personal data collected during the Public Consultation as per the applicable data protection laws and in particular the European General Data Protection Regulation (GDPR). NET only processes your personal data if this is necessary in the course of the processing and publishing of the Public Consultation comments to the Just Transition Strategy. Please, see more information here ([link to Data Protection Information](#)).

## 7. Indicative timeline

Following the finalization of the public consultation, NET will send all the received comments to the Steering Committee. Furthermore, NET will publish the non-confidential responses received from all stakeholders and a **Summary Public Consultation Report** on its corporate website towards the end of xxxx. Please note that NET will address stakeholders' comments in an aggregated manner, per section of the Just Transition Strategy, and not individually.

We look forward to hearing from you.

National Executive Team, Just Transition

Response Template

**PUBLIC CONSULTATION  
Just Transition Strategy DRAFT**

Consultation Period: day/month/year-day/month/year

- Personal/ Institution/ Company Name<sup>17</sup>:
  - Telephone:
  - Email:
- 

Would you like to keep your name confidential? If yes, please tick the box **Yes**

<b>Comments on The Draft Transition Strategy</b>		
<b>SECTION AND PARAGRAPH OF JUST TRANSITION STRATEGY</b>	<b>COMMENTS</b>	<b>COMMENT TO BE KEPT CONFIDENTIAL?</b>

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<sup>17</sup> NET is processing personal data in accordance with the General Data Protection Regulation. Please, see [here](#) more information.

### Data Protection Information

#### **Background:**

Data Protection Information **National Executive Team (NET) - Just Transition**, established under Inter-Ministerial Committee for Just Transition is responsible for the processing of personal data in the course of the present Public Consultation of the Draft Just Transition Strategy in accordance with the EU (especially General Data Protection Regulation (GDPR/EU 679/2016)) and national legislation in force regarding data protection.

The present document is providing information regarding the herein described processing. **A)**

#### **Purpose of processing**

Processing of my personal data takes place for the following purpose: Complying with requirements of the legislative and regulatory framework in force, the Draft Transition Strategy needs to be published on the Just Transition website. As per the Council of European Energy Regulators (CEER) Guidelines on Public Consultation Practices (2012), as well as the Agency for the Cooperation of Energy Regulators (ACER) Guidance note on consultations (2014), transparency, openness, ensuring confidentiality of responses, effective public stakeholder involvement and providing expert input are crucial for a public consultation. In the course of the Transition Strategy Public Consultation, NET will be collecting and processing the minimum personal data required as described below, given that the purpose of the Public Consultation is to gather feedback from the stakeholders and other interested parties on the Transition Strategy. It is in NET's legitimate interest to collect and process any such personal data necessary in order to efficiently carry through with and complete the Public Consultation process.

#### **B) Source of personal data.**

NET collects personal data included in the Template Response and documents which respondents voluntarily provide to the NET, as well as any other data which respondent him/herself have made known to the NET or which he/she will make known to NET in the future, either orally or via any other means, written or electronic.

#### **C) Categories of personal data to be processed**

Processing of personal data by NET includes the following category of data: a) Identification data: e.g. name of persons/company/institution. b) Contact data: e.g. email / mailing address, phone number.

#### **D) Recipients of personal data**

Personal data may be transferred to and received by the public interested in the Transition Strategy Public Consultation, as the results of the consultation will be published on Just Transition website, unless respondent has ticked the relevant box in the Template Response declaring that he/she wants to keep the name and contact details confidential. In this case the personal data will not be made public on the Just Transition website.

### **E) Duration of processing**

NET will collect, store and process the data for as long as it is necessary until the Just Transition Strategy has been approved by the Inter-Ministerial Committee. If there is a pending legal dispute at the end of the above period of time, data will be collected, stored and processed until the end of the dispute with a final judicial decision.

### **F) Rights of the data**

Respondent has been informed regarding the following rights, as established and under the conditions prescribed in the GDPR and the national legislation in force. More precisely: a) I have the right of access to my personal data collected, stored and processed by the NET. b) I have the right to request the rectification of inaccurate or outdated personal data concerning me and the completion of incomplete data concerning me. c) I have the right to request the erasure of personal data concerning me from the NET's archives, if their processing is not essential for the purposes for which they have been collected. d) I have the right to request the restriction of processing my data in case I contest their accuracy. e) I have the right to receive personal data concerning me, which I have provided to the NET, in a structured, commonly used and machine-readable format. Exercising the above rights or for any other issue or question regarding the above I can submit without any cost, a written application to the NET by letter, email or to the address:

In any case, respondent has the right to address the competent Data Protection Authority. In case of exercising one of the abovementioned rights, the NET will take any possible measure in order to address this right within thirty (30) days starting from the receipt of the relevant application, notifying the respondent in written form on the satisfaction of his/her request or the reasons which prevent its exercise. The respondent was also informed that he/she will be notified in case the handling of the request requires more than the abovementioned thirty (30) days. The NET will process the request as long as the respondent provide the NET with verification of his/her my identity along with the request.

## Annex 4

### Grievance Registration Form

#### Step 1: Details of the Complaint

<p>1. Name of the Person(s) or Organisation(s) filing the Complaint ("the Complainant").</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>
<p>2. Contact information of the Complainant (Please include address and, if possible, phone number and email address).</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>
<p>3. Is there a representative making this Complaint on behalf of the Complainant?</p> <p><b>Yes</b> <input type="checkbox"/> (if yes, please provide the Name and Contact information of the Representative):</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>...No</p> <p><i>Please attach proof that the Representative has been authorised by the Complainant to file the Complaint. For example, this can be in the form of a letter signed by the Complainant giving permission to the Representative to make the Complaint on his behalf.</i></p> <p><b>No</b> <input type="checkbox"/></p>
<p>Is proof of authorisation included with the Complaint?</p> <p><b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/></p>
<p>4. Are you requesting that this Complaint be kept <b>confidential</b>?</p> <p><b>Yes</b> <input type="checkbox"/> (if yes, please explain why you are requesting confidentiality)</p> <p>.....</p>

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**No**

5. Please describe the **harm that has been caused or might be caused** by the Transition (*please continue on a separate sheet if needed*):

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**Step 2: Additional information**

6. What results do you hope to achieve by submitting this Complaint to the GRC?

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**Step 3: Disclaimer**

7. By clicking on the box below you acknowledge you have read and understood our *Data Protection Information* and you consent to the collection, storage, usage, sharing and generally processing of your data by NET Just Transition in accordance with the information provided in our Data Protection Information.

**Acknowledged**

**Date:**

**Signature:**

## **Supporting documents**

If possible, please provide the following supporting documents by email to xxxx@xxx.com:

- Proof that the Representative has been authorized by the Complainant to file the Complaint. For example, this can be in the form of a letter signed by the Complainant giving permission to the Representative to make the Complaint on his behalf.
- A written record of your correspondence with other involved parties or authorities in regards to this problem (these may be letters, emails or other form of correspondence and communication).