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Participation in just transition – gaps in applying deliberative governance in coal regions of Greater Poland, Łódzkie, Lower Silesia and Silesia

Abstract: The paper explores the use of proactive participation tools in strengthening a deliberative governance (DG) within transition planning for coal regions. The main research question is: *to what extent was the planning of the just transition in Polish Coal Regions (PCRs) based on the proactive participation postulated in the DG approach?* Proactive participation, as applied in the case of PCRs supported by the Just Transition Fund (JTF) – including Eastern Greater Poland, the Wałbrzych Subregion, the Belchatów Area of Transition (BAT), and the Silesian coal regions – have encountered a number of barriers during the programming of the Territorial Just Transition Plans (TJTPs). Therefore, the aim of the paper is to *indicate the gaps in participatory practices during the programming of TJTPs for PCR that limit the DG*. The study employs a focused comparison framework (FCF), combining a conceptual analysis of DG in context of detailed review of participatory instruments used in TJTPs across the PCRs. The methodology draws on the Horizon DUST project framework including in-depth interviews with policymakers and decision-makers in the four PCRs. The main findings highlight a detailed typology of gaps to proactive participation identified in the surveyed regions, including a limited range of participatory instruments, poor use of digital tools, lack of direct citizen involvement, insufficient consideration of local and sub-local levels, and the unsatisfactory commitment of public authorities.

Keywords: coal regions, deliberative governance, proactive participation

Introduction

Just transition, seen both as a key concept emphasised in the Green Deal (EU 2019) and as specific financial support for the so-called coal regions in the form

of the Just Transition Fund (JTF), has created a new context for policy planning in the coal regions in the European Union (EU) programming period 2021–2027.

Apart from strictly substantive dimensions related to: mitigation of negative effects of energy transition in coal regions; support to the SMEs, renewable energy sources (RES), circular economy, reskilling and upskilling, regeneration of post-industrial areas; both the concept of just transition itself and the JTF regulation place a strong emphasis on the quality of transition policy planning processes. This participatory approach to planning transition policies of a place-based nature along with the use of a wide range of participatory tools were emphasised in TJTPs programming, aiming to include broad social groups, citizens into the process.

This modern governance approach to the issues of participation in the process of programming the transition policies at the level of coal regions is based on the **active subsidiarity principle**, emphasized by the European Commission (EU 2018), has created assumptions for a different approach to public management, called **deliberative governance** (DG). Its task is to facilitate co-production between citizens and governments in participatory policy planning. DG means primacy for civic participation, understood as an inclusion in the process of formulating, decision making, implementing and monitoring various social groups, and especially those who until now – for various reasons (such as economic, cognitive, volitional, spatial) – have been excluded from the policy planning processes.

According to DG, just transition planning should aim to balance traditional representative participation with proactive participation of citizens. The complexity of the problems of transition of coal regions means that DG is also seen as a way to improve the characteristics of communities (such as: trust in public institutions, build social capital, improve capacity to engage). These are issues that are particularly important for greater inclusion of least engaged communities in complex, multi-level governance.

Proactive participation, in the tool sense, requires competences and more broadly institutional capacities related to the skilful combination of digital and non-digital participatory mechanisms (UN 2020). In the case of both of these mechanisms, there are a number of barriers of effective application. For example, the barriers to use of e-democracy tools (understood as digital tools for online information sharing, consultation, co-decision-making between decision-makers and citizens) may include: unwillingness of institutions to adopt new digital software, especially on issues involving conflicting stakeholder interest; lack of knowledge and experiences in using e-democracy tools; strong reliance on technology; digitally excluded groups of citizens not active in e-democracy practices. There are also a number of organizational barriers related to the use of traditional participation methods that may be used for deliberative participation, for example (Morgan 2018, OECD 2020): large scale of population (technical limitations), stakeholders with conflicting interests, time pressure to obtain representative results of consultations conducted directly with citizens; the communication channels to reach out citizens.

The DG approach to planning transition focusing on broader participation of citizens has somewhat faded into the background of the politically turbulent process of preparing TJTPs for PCR. The discussion on support for these coal regions in 2021–2023 was held mainly in the categories of: eligibility of regions and the model of distribution of JTF. However, DG approach is a kind of organizational innovation that promotes greater effectiveness of intervention and greater involvement of stakeholders in the transition processes. Hence, the main research question of the paper is: **to what extent was the planning of just transition in PCR based on proactive participation postulated in the DG approach?**

The aim of the article is to indicate the gaps in participatory practices during programming of TJTPs for PCR that limit DG. In empirical terms the aim was achieved by examining programming process in four TJTPs prepared for PCR, which reflect different socio-economic, institutional and political contexts for applying DG approach, i.e.: Eastern Greater Poland, Belchatow Area of Transition (BAT) in Łódzkie, Walbrzyski subregion in Lower Silesia and Silesia. For the purposes of the analyses two working hypotheses were defined:

- the process of planning TJTPs in PCR mainly used traditional forms of representative participation, while the use of DG participation instruments was rudimentary;
- the “shallow” process of proactive participation in planning TJTPs in PCR indicates the number of gaps, which hinders the change into DG as an approach that ensures on one hand better matching of interventions to the real needs of stakeholders.

This paper is structured in six sections. First includes introduction. The second contains a review of theoretical literature on DG and broader participatory practices. It forms a conceptual framework for empirical study. The third section describes the methodology, and the fourth presents results found. The fifth section contains the discussion. The proposed conclusions in terms of policy recommendations are included in the sixth section.

Conceptual framework for deliberative governance: The role of proactive participation

DG and pro-active participation root to **placed-based policy approach**, which means a move away from central policies (“top-down”) towards policies tailored to the specific conditions of regions (“bottom-up”) (Pike et al. 2016). This sharp contrast to universal models in planning structural changes in the regions is visible both in conceptual studies (Capello, Nijkamp 2009) and in the political recommendations such as the Barca’s report (2009). The “bottom-up” approach results in a dynamic development of regional concepts that draw on the specificity of local conditions and lead to the development of evolutionary economic geography, including concepts and ideas related to governance and participation (Turok et al. 2018).

Various stakeholder involvement – emphasized in the place-based approach – creates space for more detailed concepts related to the inclusion of diverse stakeholders into a process of policy planning, such as the active subsidiarity principle and deliberative governance. The first concept, i.e. the **active subsidiary principle**, is an extension of the traditional principle of subsidiarity, according to which higher levels of government (e.g., state, region) delegate competences to lower levels (up to the level of civil society), and actively support lower levels in formulating and implementing policies (European Parliament 2021, Moodie et al. 2021, ECR 2024). Thus, it is the principle that supports an ability of local stakeholders to act independently and to co-decide on local issues, and also it assumes that the inclusion of “grassroots” stakeholders supports decentralization, cooperation, and strengthens the competences of local actors. The active subsidiary principle is also a way to effectively listen to the voice of citizens and properly recognize local specificities, institutional capacities, and development challenges (Bachtler 2013, European Parliament 2021).

The active subsidiarity principle is linked with the concept of **deliberative governance** (DG), which assumes that a decision-making process, including policy programming, is based on dialogue and proactive participation. This means that diverse stakeholders (public, private, social, civil) actively participate in an open dialogue, which leads to better understanding among actors, balancing often polarized opinions, and consequently, provides the basis for developing acceptable solutions better suited to the local context (Healey 1997, Hajer 2003). In DG, dialogue between stakeholders leads to mutual learning and to better understanding of the concerns and expectations of groups. The implementation of DG requires, among other things, appropriate institutional capacity, trust, and transparency. DG is proposed as a mechanism for formulating policies that respond to significant development challenges, such as those related to the transition of regions towards a low-emission economy (Sabel, Zeitlin 2008).

In empirical research a **broader analysis of the participatory process** in DG may include studies related to the following dimensions (Rowe, Frewer 2000, OECD 2020, Dean 2023): (i) application of digital tools, (ii) level of participatory process, (iii) stages of policymaking open to participation, (iv) authorities' commitment, (v) impact of participation on policy documents, and (vi) groups of participants. Generally, the higher the levels of these dimensions, the closer the participation process itself is to a comprehensive level in terms of DG.

For the **application of digital tools** in the context of proactive participation, it is important to use tools related to: co-production of policy, idea crowdsourcing, hackathons, co-creation of citizens budgets, geo-questionaries, online voting, petition platforms, social media as citizens mobilization channels (Dean 2023). For the **level of participatory process**, in order to be able to talk about the DG, participation instruments should be used at the sub-regional, local and sub-local levels, i.e. in a way enabling the recognition of voices of the most grassroots stakeholders of a given policy (Rowe, Frewer 2000). For the **stages of policymaking process open to participation** in the context of proactive participation, stakeholder participation is assumed in all stages of policy programming and

implementation, i.e. from diagnosis, visioning, through solution identification, policy formulation, decision-making and implementation (OECD 2020).

For another dimension, i.e. **authorities commitment**, it is assumed that it is desirable to initiate a dialogue by the authorities and include the citizens' voice into a policy (Moysan, Ródenas-Rigla 2024). But the application of even very diverse participation instruments can lead to varying impacts on the final records of a given policy. Thus in the context of proactive participation, it is desirable to effectively include the stakeholder demands 'discovered' during a dialogue into a final policy records.

Table 1. Conceptual framework for broader analysis of participatory instruments

Dimensions of broader analysis	Analysis and evaluation of participatory instruments
(i) Application of digital tools	A (basic): websites, newsletters, social media; on-line meetings, B (consulting): questionnaire research, internet forum, platforms collecting remarks, C (co-production): idea crowdsourcing, hackathons, co-creation of citizens budgets, geo-questionaries, D (decision making): on-line voting, E (initiation): petition platforms, social media as citizens mobilisation channels
(ii) Level of participatory process	A: central, B: regional, C: sub-regional, D: local, E: sub-local
(iii) Stages of policymaking process open to participation	A: diagnosis, B: identification of solutions, C: policy formulation, D: decision making, E: implementation
(iv) Authorities commitment:	A: very low (authorities does not participate), B: low (authorities passively observe the discussion), C: moderate (authorities open a discussion and answer questions), D: high (authorities actively participate in participation), E: authorities initiate a dialogue and include the citizens voice in policy document
(v) Impact of participation on policy document	A: to very small extent, B: to small extent, C: to moderate extent, D: to large extent, E: to very large extent
(vi) Groups of participants:	A: public administration, B: social institutional partners & NGOs, C: business, D: HEIs & R&D, E: citizens

Remarks: NGOs – non-governmental organizations; HEIs – higher education institutions; R&D – research and development institutions.

Source: own elaboration.

In the case of the last dimension, i.e. **groups of participants**, in accordance with the assumptions of proactive participation, the participation process should include various stakeholders (public, social institutions, NGOs, business, HEIs and R&D), and especially citizens (Moysan, Ródenas-Rigla 2024). Citizens direct involvement distinguishes representative participation from proactive participation, and it is one of a hallmark of the concept of DG. A conceptual framework for a broader study of participation instruments is presented in Table 1.

Method and data

The research methodology was aimed at solving the paper's research question i.e.: **to what extent was the planning of just transition in PCR, eligible for JTF, based on the postulated DG approach in terms of proactive participation and achieving the purpose of the article, i.e.: to indicate the gaps in participatory practices during programming of the TJTPs for PCR, qualified for JTF support, that limit DG.** The following tasks were used to verify the research hypotheses:

- a) brief characteristics of the TJTPs as a place-based approach to transition of PCR. Desk research was used in reference to: TJTPs and related documents;
- b) broader analysis of participatory instruments applied during the TJTPs programming in terms of proposed conceptual frameworks (Table 1). This part of the study was also made by desk research of TJSPs and related documents¹, as well as by the in-depth interviews (IDI) with policymakers and decision-makers in institutions responsible for the TJTPs (results included in Table 2). The structure of IDIs developed for the Horizon DUST project had a more elaborate framework and included the following aspects:
- existence of mechanisms of deliberative participation within a given policy measure, i.e. the analyzed document such as a TJTPs and social agreements;
- motivations for undertaking mechanisms of deliberative participation;
- mobilization of communities that are the least involved in the creation of a given *policy measure*;
- identification of key mechanisms of deliberative participation (like: steering committees, working groups, participatory budgeting, participatory mapping, mini-publics, co-creation of projects, others);
- identification of instruments of deliberative participation (like: information meetings; information meetings with discussions for the public, private, and third sectors; workshops for the public, private, and third sectors; public hearings; official consultations of documents; support for the preparation of

¹ These included:

- for Dolnoslaskie: Social TJTP of Walbrzych Subregion (2021); TJTP of Lower Silesia – Walbrzych Subregion. 2022
- for Lodzkie: TJTP of Lodzkie (2023); Social Agreement (2022);
- for Slaskie: TJTP of Silesia (2022); Social Agreement (2021);
- for Wielkopolskie: TJTP of Eastern Greater Poland (2022); Support Agreement (2024).

project fiches; international advisors; social dialogue; negotiations; meetings with experts);

- quality of the deliberative process (transparency of objectives, clarity of roles, engagement and accountability, inclusiveness, adequacy of resources, use of digital tools);
- outcomes and benefits of the deliberative participation process;
- barriers to the deliberative participation process;
- facilitators of the deliberative participation process.

For the purposes of this article, those themes from the conducted interviews were extracted that constitute the conceptual framework (see Table 1). The interviews were partly carried out within the Horizon DUST project (Silesia and BAT in January–April 2025) and independently (Eastern Greater Poland and Lower Silesia in June 2025). A total of 18 interviews were conducted with policy makers and decision-makers from the following institutions:

- Marshal Offices of the following Voivodeships: Lower Silesia, Łódź, Silesia, and Greater Poland;
- City of Katowice, City of Walbrzych;
- Bełchatów County;
- Regional Development Agency S.A. in Konin;
- Factory of Local Initiatives – Zimbardo Center;
- Polish Green Network;
- KADRA Trade Unions in Katowice and Bełchatów;
- KADRA Trade Union Federation;
- Regional Council for Just Transition in Katowice;
- Bełchatów–Kleszczów Industrial and Technological Park;
- PGG S.A. Katowice;
- PGE GiEK S.A. Bełchatów;
- ZE PAK S.A. Konin.

The IDIs were recorded, or handwritten notes were taken in cases where the respondents did not consent to recording. Based on this material, transcripts were prepared, which were coded in the first stage using open coding (the “breaking down” of the text into smaller fragments or themes). In the second stage, selective coding was applied (identifying the main themes). The use of selective coding was justified, as the research conducted within Horizon DUST was based on grounded theory, which formed the conceptual framework.

(c) identifying gaps in DG in context of proactive participation in the TJTPs programming in PCR. For this task the focused comparison framework (FCF) was applied. It is a methodology used in comparative research, and in a case study surveys (George, Bennett 2005). It involves selection of small number of cases and comparing them by a specific concept/theory along with corresponding set of variables. In the conducted gaps analysis the cases refers to TJTPs programmed for PCR, and a set of variable correspond to conceptual framework of broader analysis of participation instrument presented in Table 1. In final comparison and presentation of results the portfolio analysis was used (Table 3). FCF is focused on qualitative comparisons (like in-depth analysis of participatory

instruments used by regional authority in surveyed PCR), and examining a context and process tracing (i.e. approaches of applying participatory instruments to the TJTPs programming).

The contextual depth, referring to conditions of apply the participation instruments during TJTPs programming in PCR, was also caught up by one author's of the paper who actively participated in programming of TJTP for Silesia and consulted of all others TJTPs (Eastern Greater Poland, BAT in Łódzkie, Walbrzyski subregion in Lower Silesia). Due to this active involvement into just transition programming in Poland from 2020 up to now (in forms of meetings with policy-makers, meetings with various stakeholders, consultations on just transition issues addressed to stakeholders, activities with last engaged communities within the Horizon DUST project [www1] in Silesia and BAT) it was possible to apply the observation techniques which helped to catch up the threads and nuances of participation.

Results

TJTPs as place-based approach to transition of PCR

In five Polish voivodeships (11 coal regions), the regional authorities were faced with the need to prepare TJTPs in order to uptake the JTF. According the JTF regulation (EU Regulation 2021) the TJTPs must be place-based oriented by tailoring both diagnosis and solutions to specific areas challenging transition. A TJTP programming should also apply the proactive participation instruments to ensure the DG approach. Point 3.1 of a TJTP must contain references to partnership by describing arrangements for involvement of stakeholder in preparation, implementation, monitoring and evaluation of a TJTP as well as outcomes of public consultation (EU Regulation 2021).

TJTP of Eastern Greater Poland (2022) covers one coal region, designated from a part of the Koninski subregion (NUTS3), the so-called Eastern Greater Poland. It includes 4 counties (kolski, koninski, slupecki, turecki) and the city with a status of a county i.e. Konin. The TJTP of Eastern Greater Poland (2022) was developed the fastest among all PCR. Its working document was finalised at the beginning of 2021 (April), but works already started in 2019 by signing the Agreement for just transition of Eastern Greater Poland (according with corresponding working groups gathering representatives of public, private and social sectors) (ARRK 2021). The works on TJTP of Eastern Greater Poland was coordinated by local Agency of Regional Development from Konin.

TJTP of Łódzkie (2023) covers one coal region, designated from a part of the Piotrkowski subregion (NUTS3) and a part of the Sieradzki subregion (NUTS3), the so-called Belchatow Area of Transformation (BAT), which consists of 38 communes. The TJTP was created in 2022–2023 and was prepared by a consulting company as part of the technical assistance of the Ministry of Funds and Regional Policy to the Łódzkie region. During the works on the document, actions

were taken to promote the participation of representatives of various groups. TJTP Lodzkie (2023) appears as policy which combines the ‘top-down’ and ‘bottom-up’ approaches within the place-based orientation. Finally, after a series of EU Commission remarks, the document was approved by the regional authorities of the Lodzkie region in 2023.

TJTP of Lower Silesia – Walbrzych Subregion (2022) covers one coal region designated from the Walbrzyski subregion (NUTS3) which consist of 5 counties (klodzki, dzierzoniowski, swidnicki, walbrzyski, zabkowicki) and the city with a status of a county Walbrzych. The TJTP was developed by regional authorities (Lower Silesia Marshal Office) with some involvement of consulting firm and support from JASPERS programme. In stage of the TJTP’s planning the so-called Working Group was created in October 2020. The group included 80 representatives of institutions and entities concerned with the coal transition in Lower Silesia, including local government, provincial councillors, non-governmental organizations, research institutions, development agencies, enterprises, and large energy companies. Notably, at the local level of Walbrzych subregion, the authorities of Walbrzych city initiated parallel works on their own transition plan called Social Territorial Just Transition Plan of Walbrzych Subregion (Social TJTP of Walbrzych Subregion 2021). The plan was the result of works of social team appointed by the Mayor of Walbrzych, which included representatives of all local governments of the Walbrzych subregion and the Kamienna Góra county, representatives of business organizations, chambers of commerce and industry, business environment institutions, the Wroclaw scientific and research community around the University of Life Sciences, the Wroclaw University of Science and Technology and the Silesian University of Technology, members of social non-governmental organizations and ecological associations (Social TJTP of Walbrzych Subregion 2021). The reason for duplication of works on a just transition was a political conflict between the local authorities of Walbrzych subregion and the regional authorities in Wroclaw².

TJTP of Silesia Voivodeship (2022) covers seven coal regions of the Silesian Voivodship, which form the largest mega coal region in the EU (Drobniaik 2023). The document was created in 2021–2022 with a very wide (as for Poland case) participation of representatives of various stakeholders (local communes, R&D and HEIs institutions, chambers of commerce, large enterprises, nongovernment organisations). This measure illustrates a typical ‘bottom-up’ and ‘place-based’ approaches. The TJTP was prepared by the Silesia Marshal Office and it directly focused on various aspects of just and energy transition of the region (i.e. economic, social, spatial, institutional, environmental).

² The conflict in drafting the programming document for the Just Transition Fund (JTF) had a political background. Walbrzych represented a center supportive of the Civic Platform and was in conflict with the regional authorities, whose decision-makers were affiliated with the Law and Justice party. In contextual terms, the Civic Platform advocated for a *regional model* of distributing funds from the Just Transition Fund (JTF), whereas the Law and Justice supported a *centralized model* of the JTF distribution.

Broader overview of participatory instruments applied in tjtps programming

Taking into account the records of TJTPs for PCR as well as findings from in-depth interviews a wide range of participation instruments were identified in the TJTPs programming (Table 2). But these instruments cover mainly the basic participation practices like: information meetings, websites providing basic information about the transition, official consultations of TJTPs along with collecting of remarks. The number and nature of participation instruments is comparable in three regions (Eastern Greater Poland, Lower Silesia and Silesia). Programming of the TJTP for BAT region differs due to the relatively smaller number of participation instruments, all of which basically refer to basic participatory practices. Unfortunately, none of the TJTPs programming process applied more advanced participation instruments like: future literacy lacs, world cafe, visioning, foresight, citizens dialogue, deliberative polling and voting. Moreover spontaneous participatory instruments were not registered in all surveyed regions. The exemption is Eastern Greater Poland, where mainly local stakeholders (from various sectors) in a grassroots way initiated the spontaneous agreement for a just transition in 2019 (ARRK 2021).

Individual dimensions of the broader analysis of participatory instruments (Table 2) indicate that in all PCR the application of **digital tools for participation** was limited only to official websites, newsletter, social media (but used only to inform about the activities linked with TJTPs), and on-line meetings. Participatory process is organised mainly on regional (voivodeship) or sub-regional (coal regions) levels. Some specificity in organising a meeting on central level is registered for BAT, where the TJTP were initiated by the Ministry of Funds and Regional Policy (in cooperation with Lodzki Marshal Office) and mainly executed by a consulting firm (within the technical support action financed by central government).

The **stages of policymaking process open to participation** in majority of PCR during TJTPs programming were almost the same. They refer mainly to: problem diagnosis, identification of solutions and policy formulation. Silesia and Eastern Greater Poland are the exemptions, because of applying more complex participation instruments extend to decision making and implementation (in terms of including strategic projects within the TJTPs).

That are significant differences among the PCR within regional **authorities commitment** to results of participation activities. In Silesia and Eastern Greater Poland in few participatory instruments (i.e. dedicated workshops for public, private and third sectors to invent project; and individual support for stakeholders in completion of projects' fiches) the regional authorities commitment was very high. In case of other participatory practices the regional authorities commitment to the 'voice' of stakeholders was average at best. And sometimes even unstable, as in the case of BAT, where the regional authorities in 2021 were not convinced at all to the transition and the need to prepare the TJTP for BAT was not a priority.

Table 2. Broader analysis of participatory instruments applied in TJTPs planning in selected PCR

Participatory instrument	(i) Application of digital tools	(ii) Level of participatory process:	(iii) Stages of policymaking process open to participation	(iv) Regional authorities commitment	(v) Impact of participation on TJTPs	(vi) Groups of participants
TPST of Eastern Greater Poland						
(b1) Information meetings (on-line & on-site)	A	B, C	A	C	A	A, B, C, D
(b2) Marshal Office website about the transition	A	B	A	C	A	A, B, C, D, E
(e1): Information meetings with discussion for public, private and third sectors	A	B, C	A, B, C	D	D	A, B, C, D
(e2): Public hearing	A	B, C	A, B, C	C	C	A, B, C, D, E
(e3): Official consultations of the documents with collection of remarks	A, B	B	A, B, C	C	E	A, B, C, D
(e4): Meetings with the EU Commission representatives and international advisers (e.g. PWC, World Bank)	A	B	A, B, C	C	C	A, B, C, D
(a1): Steering committee	A	B, C	A, B, C, D, E	D	E	A, B, C

Participatory instrument	(i) Application of digital tools	(ii) Level of participatory process:	(iii) Stages of policymaking process open to participation	(iv) Regional authorities commitment	(v) Impact of participation on TjTPs	(vi) Groups of participants
(a2): Dedicated workshops for public, private and third sectors to identify strategic transition projects	A	B, C	A, B, C, D, E	E	E	A, B, C, D
(a3): Individual support for stakeholders in completion of their projects' fiches	A	A, B, C, D	A, B, C, D, E	E	E	A, B, C, D
(c1) grassroots Agreement on just transition of Eastern Greater Poland	A	E	A, B, C, D, E	D	D	A, B, C, D
TjTP of Łódzkie – BAT						
(b1) Information meetings (on-site)	A	C	A	B	B	A, B, C
(e1) Information meetings with discussion for public, private and third sector	A	C	A, B, C	C	C	A, B, C, D
(e2) official consultations of the documents with collection of remarks	A	C	A, B, C	B	C	A, B, C

Participatory instrument	(i) Application of digital tools	(ii) Level of participatory process:	(iii) Stages of policymaking process open to participation	(iv) Regional authorities commitment	(v) Impact of participation on TjTPs	(vi) Groups of participants
(e3) meeting with technical support (PwC company) delivered by the central government with meetings address to various sectors	A	A, C	A, B, C	B	D	A
(a1): Steering committee	A	B, C	A, B, C, D, E	D	E	A, B, C
TjTP of Lower Silesia – Wałbrzych Subregion						
(b1) Information meetings (on-line & on-site)	A	B, C	A	D	A	A, B, C, D
(b2) Marshal Office website about the transition	A	B	A	C	A	A, B, C, D, E
(e1): Information meetings with discussion for public, private and third sectors	A	B, C	A, B, C	D	D	A, B, C, D
(e3): Official consultations of the documents with collection of remarks	A, B	B	A, B, C	C	E	A, B, C, D

Participatory instrument	(i) Application of digital tools	(ii) Level of participatory process:	(iii) Stages of policymaking process open to participation	(iv) Regional authorities commitment	(v) Impact of participation on TJTPs	(vi) Groups of participants
(e4): Meetings with the EU Commission representatives and international advisers (e.g. PWC, JASPERs)						
(a1): Steering committee	A	B	A, B, C	C	B	A, B, C, D
(a2): General workshops for public, private and third sectors	A, B	B, C	A, B, C, D, E	D	E	A, B, C
			A, B, C, D, E	D	E	A, B, C, D
TJTP of Silesia						
(b1) Information meetings (on-line & on-site)	A	B, C	A	C	A	A, B, C, D
(b2) Marshal Office website about the transition	A	B	A	C	A	A, B, C, D, E
(e1): Information meetings with discussion for public, private and third sectors	A	B, C	A, B, C	D	D	A, B, C, D
(e2): Public hearing	A	B, C	A, B, C	C	C	A, B, C, D, E
(e3): Official consultations of the documents with collection of remarks	A, B	B	A, B, C	C	E	A, B, C, D

Participatory instrument	(i) Application of digital tools	(ii) Level of participatory process:	(iii) Stages of policymaking process open to participation	(iv) Regional authorities commitment	(v) Impact of participation on TJTPs	(vi) Groups of participants
(e4): Meetings with the EU Commission representatives and international advisers (e.g. PwC, World Bank)	A	B	A, B, C	C	C	A, B, C, D
(a1): Steering committee	A	B, C	A, B, C, D, E	D	E	A, B, C
(a2): Dedicated workshops for public, private and third sectors to identify strategic transition projects	A	B, C	A, B, C, D, E	E	E	A, B, C, D
(a3): Individual support for stakeholders in completion of their projects' fiches	A	A, B, C, D	A, B, C, D, E	E	E	A, B, C, D

Remarks:

- (i) **Application of digital tools:** A – (basic) websites, newsletters, social media; on-line meetings; B – (extending – consulting) questionnaire research, internet forum, platforms collecting remarks; C – (co-production) idea crowdsourcing, hackathons, co-creation of citizens budgets, geo-questionnaires; D – (decision) : on-line voting; E – (initiation) petition platforms, social media as citizens mobilisation channels;
- (ii) **Level of participatory process:** A – central; B – regional; C – sub-regional; D – local; E – sub-local;
- (iii) **Stages of policymaking process open to participation:** A – Diagnosis; B – identification of solutions; C – policy formulation; D – decision making; E – implementation;
- (iv) **Regional authorities commitment:** A – very low (authorities does not participate); B – low (authorities passively observe the discussion); C – moderate (authorities open a discussion and answer questions); D – high (authorities actively participate in participation); E – authorities initiate a dialogue and include the citizens voice in policy document;
- (v) **Impact of participation on TJTPs:** the results of the participatory processes were translated into any policy to: A – (very small extent); B – (small); C – (moderate); D – (large); E – (very large) extent;
- (vi) **Groups of participants:** A – public administration; B – social, institutional partners & NGOs, C – business; D – HEIs & R&D; E – citizens.

Source: own elaboration.

This diverse commitment of regional authorities in participatory practices is directly reflected in the records of the TJTPs. Some participatory instruments like information meetings, public hearings, meetings with experts had limited **translation on TJTPs**. And this tendency is visible in every PCR in context of mentioned participatory instruments. In those PCR where more complex participatory instruments were applied their results were translated into the TJTPs in better way (like in Eastern Greater Poland and Silesia).

In terms of **groups of stakeholders**, the participatory practices were addressed to representatives of public administration, private, social institutional partners along with NGOs, business, HEIs and R&D institutions. The participatory instruments addressed directly to citizens are exemption (Eastern Greater Poland and Silesia)

Gaps in deliberative governance in the TJTPs programming

The broader analysis of the participatory instruments applied in TJTPs programming in PCR allowed for further investigation towards gaps in DG in terms of proactive participation. According the conducted analysis the **first gap refers to the types of participatory instruments applied** which determine the level of stakeholder engagement into a policy design. In programming of TJTPs in all survey PCR there is a dominance of basic and extended participatory instruments. Some positive differences were reported for Eastern Greater Poland and Silesia where also more advanced instruments were used. In none of the TJTPs – with the exemption of Eastern Greater Poland – more complex participatory instruments were used, which undermine the implementation of DG in transition planning in PCR.

Broader analysis of participatory instruments allowed to show some additional gaps in DG in terms of proactive participation. The **second gap refers to very poor application of digital tools** into the participatory practices. Mainly basic digital tools for one-way information transmission were used. This gap is probably one of the reasons of the **third gap related to the lack of direct involvement of citizens** into the TJTPs planning. Digital tools of participation may involve large number of citizens whose effective inclusion into a policy planning is not feasible by using traditional participation instruments. To some extent the second gap probably also determine the **fourth gap i.e. failure to take into account the local and sub-local levels** in participatory process of TJTPs programming. Similarly, as in the case of engaging citizens, it is hardly possible – both practically and organizationally – to ensure full-scale use of traditional participation methods across all areas of a coal region in a short period. In this case, digital instruments seem to be more rationale solution. The last important **gap is linked with unsatisfactory authorities commitment**. This gap occurred to varying degree in different PCR. Stronger authorities commitment were reported in Eastern Greater Poland, Silesia and in Lower Silesia (but not in reference to all participatory instruments). In the latter case due to different political options, the commitment of authorities created a conflict between the local authorities of Walbrzych subregion and the regional authority.

Discussion

The results of study confirmed some of the conclusions resulting from the OECD (2020) findings, or studies conducted by Fung (2003), Rowe & Frewer (2005), Healy & Barry (2017) in terms of exclusion of citizen from participation, low quality of DG, limited trust in the real impact of participation on policy records, and deficiencies in an institutional potential to conduct proactive participation.

For example, the **exclusion of citizen from participation** is confirmed by the identified gap relating to the lack of direct involvement of citizens and the gap which refers to the failure to take into account the local and sub-local levels. In the case of the TJTPs in PCR, these gaps lead to a context in which participation is mainly carried out by representatives of public, private and social institutions, i.e. stakeholders who are better educated and have better access to information. This way, marginalized groups are created (i.e. last engaged communities), such as citizens with lower educational attainment, who do not perform representative functions. In the case of PCR, these groups include: seniors, youth, miners and employees of related industries, women including those employed in mining. This is a particularly dangerous phenomenon in the context of the exclusion of vulnerable groups from the transition, which Healy & Barry (2017) draw attention to, emphasizing that it limits the effective implementation of the concept of a just transition and undermines its positive narrative. This is confirmed by the findings of Brauers & Oei (2020): according to them, decisions regarding the transition of the coal sector in Poland are deeply embedded in political arrangements (the “Triple Embeddedness Framework”). The lack of proactive participation processes leads to political tensions and the maintenance of the status quo, which hinders a rational approach to the coal phase-out process in PCR.

Table 3. Portfolio of PCR in terms of capacity towards DG in TJTPs programming

Types of participatory instruments applied	Complex	Eastern Greater Poland		Silesia	
	Advanced	Lower Silesia – Walbrzych Subregion			
	Basic and extended	Belchatow Area of Transition			
		Low	Medium	High	
		Advancement in applying participatory instruments			

Source: self-elaboration.

Remarks:

	high capacity for DG		average capacity for DG		deficiencies in capacity for DG
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The gap identified in the study, which refers to the types of participatory instruments applied confirmed the thesis about the **low quality of DG** (Fung 2008) in terms of proactive participation. In TJTPs for PCR programming, activities refer primarily to the group of basic participatory instruments. These are

basically instruments of one-way communication, not participation in fact as noted by Rowe & Frewer (2005). More complex instruments of participation are exceptions referring to Eastern Greater Poland and partly to Silesia along with Lower Silesia. Advanced instruments were not used at all in the participation process, except of Eastern Greater Poland. This contributes to the deepening of the phenomenon of knowledge asymmetry among citizens (Fung 2003). These findings are consistent with Nowakowska's et al. (2021) broader observations on the transition processes in Silesia and in BAT. The authors emphasize that both regions show significant deficits in knowledge and preparedness for the Just Transition process, particularly in terms of action programming, information policy, participation, and cooperation among local partners. Nevertheless, the analyses conducted in this article provide a more detailed insight into one of the sources of weakness in the process of proactive participation carried out in the surveyed regions.

However, the study results did not confirm the conclusions of Fischer (2000) regarding the **superficiality of participation**, especially its instrumentalization to justify political decisions. In all PCRs, the TJTPs programming involved more than statutory consultations. Despite the short timeframe for programming a completely new transition policy (this period falls primarily in 2022), regional authorities utilized far more participatory instruments than was in the case of regional development strategies (where formal public consultations mandated by law were mostly applied). This conclusion is supported by the findings of Topaloglou et al. (2024), including their research on the Silesia region concerning the level of stakeholder engagement. According to their study, the just transition programming demonstrates a significant degree of information dissemination to stakeholders; however, there remains a need for more effective communication, such as the use of IT tools and digital platforms to reach a broader range of stakeholders.

Jumping into the discussion on contextual factors of participation, it is helpful to structure the conclusions from the broader analysis of participatory practice into a portfolio based on the types of participatory instruments used and the advancement of applying participatory practices³. With this structuring it is possible to demonstrate a different level of **capacity of PCR towards participatory practices** which determine **DG** in consequence (see Table 3). The demonstrated differences open a discussion on contextual factors of participation, which refer to: institutional capacities, social, resources, technical and territorial factors (Fung 2006, OECD 2020).

In terms of **institutional capacity**, the authorities of Greater Poland and Silesia demonstrated relatively higher level of readiness for co-decision, openness and transparency of participation, and large engagement in organising the participation process from the beginning of 2020.

³ It is a dimension summarizing gaps in: applied digital tools, level of participatory process, stages of policymaking process open to participation, regional authorities commitment, impact of participation on TJTPs, and groups of participants.

In Silesia, a dedicated transition department was organised within Silesian Marshal Office, and a special project (titled: Regional Observatory of Transformation Process) was prepared, within which more complex instruments of participation such as dedicated workshops and individual consultations were implemented. In Greater Poland, there has been a decentralization of just transition planning, i.e. works on TJTP was already started in 2019 by spontaneously establishing local working groups as part of the Agreement for Just Transition for Eastern Greater Poland (ARRK 2021). Finally, the TJTP programming was entrusted to the local Regional Development Agency from Konin (core city of Eastern Greater Poland). This provided close interaction with stakeholders on the ground.

However, the willingness to participate in decision-making was significantly lower in the BAT and Lower Silesia. In 2021, the Lodz region (BAT), which was initially not eligible for a JTF at all, did not conduct any preparations for a JTF. Reliance was placed primarily on central government decisions, which remained unclear until early 2022. This created uncertainty both at the regional level and within BAT itself. Finally, the TJTP for BAT was created by a consulting firm commissioned by the Ministry of Funds and Regional Policy. In turn, the political conflict between the regional authorities of Lower Silesia and the local authorities of Walbrzych subregion resulted in the polarization of positions to such an extent that two separate TJTPs were created. Ultimately, the EU Commission adopted the TJTP prepared by the regional authorities, but this conflict has lowered trust and empowerment at local level.

The **social contextual factors** were also different. High level of trust, including participation in information meetings, conferences, workshops, and working groups, were observed in Eastern Greater Poland and Silesia. Not only public institutions were active, but also businesses and NGOs (especially in Eastern Greater Poland). Both regions have good local government experience – a kind of social maturity – for example, in using social dialogue to support the restructuring of the mining sector. However, interest in participation in BAT was lower (both in terms of the number of meetings and the number of participants).

There was a great local interest in TJTP programming in the Walbrzych subregion. Uptake of the JTF to minimize the negative effects of the rapid restructuring of this subregion in the 1990s (when coal mines were suddenly closed) was perceived as a kind of 'compensation' for that time. The JTF was seen as a viable resource for effective socio-economic transition. At the level of the Lower Silesian authorities, commitment was similarly strong, although the aforementioned political conflict did not facilitate achieving a high level of public trust. The above confirms Smith's (2009) findings that conflicts among different level of authorities, polarization of positions, and contradictory information influence on passive or demanding attitudes of citizens.

Resource contextual factors also played an important role. Eastern Greater Poland and Silesia were provided with financial support from national and EU funds (including the Regional Observatory of Transformation Process in Silesia). In the case of BAT, the central government provided technical support for the

TJTP programming, but from a central level where local stakeholders had little influence. This way, resource factors determined the number of participation instruments used in PCR and the frequency of their use (e.g. the number of meetings and consultations in Eastern Greater Poland and Silesia were very high). This confirms the findings of Andrews & Beynon (2017) according to which institutions, depending on the allocated resources, may support stakeholders' access to information, experts, infrastructure, type and frequency of meetings.

The study revealed a very low level of participation related to **technical contextual factors**, i.e., a lack of knowledge and digital tools application for e-participation in TJTPs programming. In terms of technical contextual factors, each region demonstrates significant deficiencies. These conclusions are particularly important in the context of studies made by the European Parliament (2018) and Falco & Kleinhans (2019), primarily in the context of increasing transparency, accessibility, and the inclusion of broader groups of citizens in the policy development process in the era of digital transition.

When comparing the settlement structure of PRCs, including their level of urbanisation and the size of the main urban centres, one can also refer to the **territorial contextual factors** determining participation, which are highlighted by, among others, Madanipour & Davoudi (2015) and OECD (2020). In urban coal regions (like Silesia) with developed social networks and infrastructure, the application of various participation instruments was relatively easier. The smaller scale of the region and the lower degree of urbanization, according to Madanipour & Davoudi (2015), make difficult to conduct the participation process as was in the case of BAT. But this assumption has not been fully confirmed in conducted study. The best example of which is the most advanced approach to participation in Eastern Greater Poland, that is a region not dominated by big urban centres.

Conclusions

Comparative analysis of participatory instruments shows great differences along with deficiencies in terms of DG during programming of TJTP in PCR. Only in the case of Eastern Greater Poland the bottom-up participation practice initiated by local stakeholders and appreciated by the regional level in a form of the Agreement for Just Transition for Eastern Greater Poland (ARRK 2021) shows both spontaneous actions and authorities commitment (i.e. the participatory practice assumed for DG concept). In the case of Silesia some progress towards DG are visible in form of advanced participatory instruments like dedicated workshops on project design and individual consultations with stakeholders. But this actions were initiated by the regional authorities which indicates a more representative participation process then broader citizens involvement. In the case of Walbrzyski subregion in Lower Silesia the commitment of local and regional authorities in applying participation instruments were relatively significant. But political conflict between the local and regional levels consequently weakened the efforts of participation, leading to the creation of two competing TJTPs. In contrast, in BAT,

the participatory process was largely steered from the central level. It was one-directional process and showed significant deficiencies in application of active participatory instruments. Thus the participation process in BAT grasped the local context in limited way. These findings confirm first working hypothesis according to which: the process of planning TJTPs in PCR mainly used traditional forms of representative participation, while the use of DG's participation instruments was rudimentary.

The broader analysis of participatory instrument used in programming of TJTPs in PRC indicated a number of gaps in DG in context of participatory practices. They include: (i) gap referring to the types of participatory instruments applied, (ii) gap referring to very poor application of digital tools into the participatory practices; (iii) gap relating to the lack of direct involvement of citizens, (iv) gap regarding to failure to take into account the local and sub-local levels; (v) gap linked with unsatisfactory authorities commitment. These findings confirm the second working hypothesis which assumed: the “shallow” process of proactive participation in planning TJTPs in PCR indicates the number of gaps, which hinders the progress into DG as the approach that ensures, on the one hand better matching of interventions to the real needs of stakeholders, and on the other hand improves the characteristics of the community.

The indicated gaps in DG implementation in terms of participatory instruments applied during TJTPs programming in PCR may be classified as follows: (a) the **volitional gaps** (authorities commitment), (b) **knowledge gaps** (types of participatory instruments, direct citizens involvement, participation at local and sub-local levels), and (c) **technical gaps** (digital instruments of participation). To bridge these gaps towards DG effective implementation the following recommendation – addressed to regional authorities responsible not only for TJTPs, but also for other placed-based policies – may be proposed:

- long-term institutionalization of citizens participation in the context of ‘experimental governance’ (Morgan 2018, Wolfe 2018), i.e. creating a permanent participation process at the regional level, conducted in parallel with the emerging and implemented policies, and not limiting it solely to participation during the period of policy planning and their statutory consultation;
- strengthening institutional capacities in terms of knowledge about: DG concept, comprehensive participation instruments (e.g.: citizens’ panels, deliberative assemblies), the need to include citizens into participation (not only representatives of institutions), effective information and two-way communication of a participation process (OECD 2020);
- strengthening institutional capacities in application of digital tools of participation including the use of consultation platforms, applications for expressing opinions and online voting, moderating discussions during a participation process using social media and dedicated applications, i.e. the use of information portals enabling civic dialogue (Le Blanc 2020, Pateman 2012).

Summing up, the conducted study revealed a number of deficits in the context of DG concept implementation. The institutions responsible for the TJTPs, however, demonstrated varying levels of readiness and openness to the DG in policy

planning. Undoubtedly, the TJTPs programming, which required broader use of participatory instruments, was a new experience for these institutions. It was also a learning experience that calls for both further research on DG, and greater attention to the effective inclusion of citizens in planning place-based policies.

Konflikt interesów/wkład autorów

Autorzy deklarują brak występowania konfliktu interesów. Oświadczają, że tekst artykułu jest w całości ich dziełem. Podział pracy przy artykule wyglądał następująco:

- konceptualizacja: AD
- metodologia: AD
- gromadzenie danych: AD, MRS
- organizacja badań: AD, MRS
- analiza formalna: AD, MRS
- pisanie: AD, MRS

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Partycypacja w sprawiedliwej transformacji – luki w stosowaniu zarządzania deliberatywnego w regionach węglowych Wielkopolski, województwa łódzkiego, Dolnego Śląska i Śląska

Zarys treści: Artykuł analizuje zastosowanie narzędzi proaktywnej partycypacji we wzmacnianiu zarządzania deliberatywnego (DG) w procesie planowania transformacji regionów węglowych. Główne pytanie badawcze brzmi: w jakim stopniu planowanie sprawiedliwej transformacji w polskich regionach węglowych (PCR) opierało się na zasadach proaktywnej partycypacji postulowanej w podejściu DG? Proaktywna partycypacja, stosowana w przypadku PCR wspieranych przez Fundusz na rzecz Sprawiedliwej Transformacji (TJF) – obejmujących Wschodnią Wielkopolskę, subregion wałbrzyski, Bełchatowski Obszar Transformacji (BAT) oraz regiony węglowe województwa śląskiego – napotyka na szereg barier w trakcie programowania Terytorialnych Planów Sprawiedliwej Transformacji (TJTP). Celem artykułu jest zatem identyfikacja luk w praktykach partycypacyjnych podczas programowania TJTP, które ograniczają wdrażanie DG. Badanie wykorzystuje ramy porównania ukierunkowanego (FCF), łącząc analizę koncepcyjną DG z pogłębionym przeglądem instrumentów partycypacyjnych stosowanych w TJTP w poszczególnych PCR. Metodologia opiera się na ramach koncepcyjnych projektu Horizon DUST oraz na pogłębionych wywiadach z decydentami w czterech PCR. Główne wyniki pozwalają na sformułowanie szczegółowej typologii luk proaktywnej partycypacji zidentyfikowanych w PCR, takich jak: ograniczony zakres stosowanych instrumentów partycypacyjnych, niewielkie wykorzystanie narzędzi cyfrowych, brak bezpośredniego zaangażowania obywateli, niedostateczne uwzględnienie poziomu lokalnego i sublokalnego oraz niezadowalające zaangażowanie władz publicznych.

Słowa kluczowe: regiony węglowe, deliberatywne współzarządzanie, proaktywna partycypacja