



# Driving just transitions in the mining & steel sectors

The role of voluntary sustainability standards

March 2026

## About this report

This report was prepared by Emma Wilson (ECW Ltd), Haruko Horii (ResponsibleSteel), and Davidzo Muchawaya (IRMA).

### Purpose

This report presents the outcome of a joint initiative exploring how voluntary sustainability systems (VSSs) can support promoting a just transition in the mining and steel sectors. It aims to capture emerging expectations, highlight areas of alignment and disagreements, and provide a practical foundation for integrating just transition considerations into standards and assurance systems.

### Scope

The document focuses on considerations regarding enabling just transitions within the mining and steel sectors.

### Audience

The report is intended for VSSs, companies across mining, steel and related supply chains, labour organisations, civil society, policy makers, investors, donors, and researchers and practitioners working on just transition.

### Development process

This report was developed through a collaborative process between ResponsibleSteel and the Initiative for Responsible Mining Assurance (IRMA), drawing on literature review, expert interviews, and multi-stakeholder dialogue to capture insights, challenges and opportunities.

### Partnership and contributors

This work reflects the great contributions of a broad range of experts promoting a just transition, including industry representatives, labour organisations, civil society and affected communities. We are grateful to all participants who shared their perspectives, time, and expertise throughout the process.

### Funding

This project is made possible thanks to a grant from the ISEAL Innovations Fund, which is supported by:



Schweizerische Eidgenossenschaft  
Confédération suisse  
Confederazione Svizzera  
Confederaziun svizra

Swiss Confederation

Federal Department of Economic Affairs,  
Education and Research EAER  
**State Secretariat for Economic Affairs SECO**



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## Disclaimer

This document should be considered as guidance, not a prescriptive standard or blueprint. As the field continues to evolve, approaches will need to adapt over time and across different contexts. The views expressed in this publication are those of the author(s) and do not necessarily represent those of the ISEAL Secretariat, ISEAL members, or donor entities to the ISEAL Innovations Fund.

## Contact

For further information, feedback, or inquiries about this work, please contact:

- ResponsibleSteel ([info@responsiblesteel.org](mailto:info@responsiblesteel.org))
- IRMA ([info@responsiblemining.net](mailto:info@responsiblemining.net))

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## Executive summary

Industrial decarbonisation has increasingly become an urgent priority for governments and industry globally, and few sectors face stronger pressure to adapt than mining and steel.

The transitions ahead will drive structural changes stretching across mining, iron, and steel value chains and have the potential to reshape livelihoods, communities, and supply chains in ways that are only beginning to be fully analysed. Without careful planning, there is a real risk that workers and affected communities will be left behind.

As the push to decarbonise accelerates, we will see profound changes. Traditional steelmaking regions may see employment shifts as blast furnaces close, while demand for higher-grade iron ore and expanded beneficiation is expected to rise. The move toward electric and hydrogen-based steelmaking will require vast new renewable energy systems, alongside major changes to transport and logistics infrastructure. These shifts are already affecting the mining sector, especially with the reduced demand for coal, as is the increasing demand for critical minerals and metals. While these developments may be necessary for the shift to a lower carbon economy, we also have to be aware of the danger of redistributing, rather than eliminating, other associated social and environmental impacts along the value chain. This highlights the need for holistic, value chain-wide approaches to managing transition impacts.

At the same time, greater efforts are needed to ensure that those workers and communities most affected by the transition are adequately supported. Key stakeholder groups, including trade unions, communities and Indigenous rights organisations, are urging governments and industry to ensure that transitions are not only 'fast' but also 'fair' or 'just'. Voluntary sustainability standards (VSSs) can play an important role in raising awareness about just transitions and providing principles and frameworks to guide industry practice.

### About the project

This is the final report from a project to explore the potential role of VSSs in promoting and supporting just transitions, led by ResponsibleSteel and the Initiative for Responsible Mining Assurance (IRMA) and funded by a grant from the ISEAL Innovations Fund, which is supported by the Swiss State Secretariat for Economic Affairs (SECO). The project sought to identify the role standards can play towards socially responsible transitions in heavy industries such as steel and mining; and identify and engage relevant stakeholders to agree on an approach, framework or set of principles to take forward.

The project was structured around the just transition principles established by the International Labour Organisation (ILO) and the UN Working Group on Human Rights, and three key dimensions of justice from academic justice theory (procedural, distributive and restorative justice). It was implemented in three phases: Phase 1: Literature review and mapping of existing just transition frameworks and VSSs (October 2024–February 2025); Phase 2: Stakeholder engagement (interviews and workshops) (February–June 2025); and Phase 3: Synthesis (June–August 2025).

## Current gaps between policy and practice

The project revealed that the implementation of just transition is lagging behind the principles established by international bodies, despite progress in some areas. Several national governments have committed to just transition programmes, and some local governments are demonstrating leadership in just transition implementation. Key challenges include a lack of policy coherence, weak collaboration within supply chains, delays in transition planning, limited understanding of market conditions and retraining needs, and the need to enhance social dialogue with workers and communities.

Heavy industries, including mining and steel, were generally found to have a highly technological approach to decarbonisation, with less focus on ensuring that transitions are just. There are several cases of good industry practice in supporting just transitions. The mining sector (especially coal) has longer experience of mine closure and greater awareness of the just transition concept. However, heavy industries, including mining, often fall short on adequate and timely transition planning, retraining and re-skilling of workers, and meaningful engagement with workers and communities.

## Mapping of existing just transition frameworks

In Phase 1 we mapped 16 just transition frameworks from international organisations, industry, advocacy groups and Indigenous peoples. This resulted in a **Draft Just Transition Framework**, with 12 principles and 53 related core elements. The mapping exercise revealed that social dialogue, core labour rights, re-skilling and employment sit at the heart of current just transition approaches, with an increasing emphasis on human rights, and a strong focus on procedural justice. Human rights advocacy groups and Indigenous groups in particular are bringing in more distributive and restorative justice to just transition agendas, including equitable access to benefits, Indigenous self-determination, historical reparations, consumption reduction and the transformation of economic systems.

## Mapping of VSSs

In Phase 1 we mapped 10 VSSs against the Draft Just Transition Framework to understand the extent to which they currently cover just transitions. Three members of the ISEAL Alliance, an international non-profit organisation and membership body for sustainability systems, have already adopted the just transition terminology in their standards, namely Bettercoal, the Gold Standard (draft methodology) and the Roundtable on Sustainable Biofuels. Our mapping also revealed that several VSSs already address key elements of the just transition agenda, without specific reference to the term 'just transition'. This includes requirements relating to site closure and reclamation, retrenchment, Indigenous rights, land acquisition and resettlement, and climate.

The 10 VSSs overall had greater coverage than existing just transition frameworks on environmental and human rights due diligence; occupational health and safety; grievance mechanisms; and monitoring and verification. They had less coverage than the just transition frameworks on worker retraining and skills development; value-chain-wide due diligence; and equitable access to low-carbon goods and services. Areas less well covered by both VSSs and existing just transition frameworks included capacity building for meaningful stakeholder engagement; collaboration with training institutions; equitable benefit sharing; and historical reparations.

## Stakeholder insights and feedback

The findings from Phase 1, including the Draft Just Transition Framework, were taken as the basis for the Phase 2 stakeholder interviews and workshops. These activities were used to challenge the findings and ground them in the practical experience of a range of stakeholder groups. In line with the Phase 1 findings, several interviewees and workshop participants felt strongly that 'justice' needs to be at the heart of transitions. They emphasised human rights, labour rights, retraining and re-skilling of workers, gender and social equity. They prioritised meaningful stakeholder engagement and collaboration, especially with workers, affected communities, and marginalised and vulnerable groups.

Respondents highlighted the need for information sharing and capacity building to ensure that stakeholder engagement is truly meaningful. They also emphasised the importance of transition governance (ongoing social dialogue and inclusive decision-making); the value-chain perspective in engagement, due diligence and decision-making; and cumulative impact management and strategic planning in collaboration with governments. Occupational health and safety were also emphasised, including mental health, gender protections, and the prevention of harassment of workers. While there was disagreement regarding the inclusion of historical reparation within the just transition agenda, some respondents observed the need to recognise rights-holders and acknowledge the specific rights of Indigenous peoples and Indigenous self-determination. They noted the need to acknowledge and address historical impacts on Indigenous and other affected and marginalised communities in the context of just transitions.

## Just Transition Framework and just transition implementation recommendations for VSSs

Feedback from the stakeholder interviews and workshops was used to revise the original draft framework, resulting in a proposed Just Transition Framework for VSSs – a set of 9 principles and 50 core elements to guide VSSs in developing their own approach to just transitions. A set of five recommendations was also developed to help VSSs support the implementation of just transition concepts:

1. Ensure transparent and inclusive governance mechanisms within the voluntary sustainability systems
2. Employ inclusive mechanisms to develop just transition requirements
3. Provide support for implementation and reporting
4. Require and enable robust assurance
5. Model and encourage collaboration between VSSs, businesses and governments

We welcome feedback on the **Just Transition Framework and Recommendations for VSSs** and the suggested next steps.

Please contact:

**ResponsibleSteel:** [info@responsiblesteel.org](mailto:info@responsiblesteel.org)

**IRMA:** [info@responsiblemining.net](mailto:info@responsiblemining.net)

# 1. Introduction



Industrial decarbonisation has increasingly become an urgent priority for governments and industry globally, and few sectors face stronger pressure to adapt than mining and steel. There is less prioritisation of measures to ensure that the people most affected by transitions – workers and local communities – are not left behind in the process of rapid decarbonisation. Key stakeholder groups, including trade unions and Indigenous rights organisations, are calling for industries to plan and implement measures to ensure that transitions are ‘fair’ or ‘just’. Voluntary sustainability standards (VSSs) can play an important role in raising awareness and providing principles and frameworks to guide industry.

This is the final report from a project led by ResponsibleSteel and the Initiative for Responsible Mining Assurance (IRMA), with a grant from the ISEAL Innovations Fund, which is supported by the Swiss State Secretariat for Economic Affairs (SECO). The aim of the project was to develop a deeper understanding of the social impacts of low-carbon transitions in steelmaking and mining, and the role of VSSs in guiding good practice for just transitions.

### **The project had two objectives:**

- 1.** To identify the role standards can play towards a socially responsible transition in heavy industries such as steel and mining, and;
- 2.** To identify an agreed approach, framework or set of principles to take forward.

This final project report presents the high-level results of a literature review and the mapping of 16 existing international just transition frameworks and 10 VSSs, and feedback from 35 stakeholder interviews and two workshops held in Johannesburg and Brussels. The key outputs are a Just Transition Framework and Recommendations for VSSs to support and promote just transitions.

## **Decarbonisation and social change in the steel and mining sectors**

The mining industry (especially coal) contributes up to 10 per cent of global CO<sub>2</sub> energy related emissions,<sup>1</sup> while the steel industry is also responsible for about 10 per cent.<sup>2</sup> These sectors are a key focus for countries seeking to reduce their carbon emissions to net zero by 2050 under the Paris Agreement (Algers et al, 2024; WBA, 2024). Decarbonisation efforts are already causing disruption in these sectors and are set to drive change on a large-scale over the next decades, with the decommissioning of emissions-intensive technology, installation of alternative near-zero emissions compatible technology, roll out of low-carbon energy infrastructure (including hydrogen), and shifting supply chains.

Decarbonisation will cause fundamental changes in how ores are excavated, prepared, and processed into metallics for steel production. The mining, iron and steel supply chains will undergo shifts in energy and material dependencies, as well as the production processes and labour requirements for operation. Human resources will need to adapt to the demand for new skill sets, possibly in new locations, and revised labour intensities (Vogl, 2023).

1 <https://www.iisd.org/system/files/2024-08/igf-decarbonization-mining-sector.pdf>

2 <https://www.responsiblesteel.org/resources/charting-progress-to-1-5degc-through-certification>

Traditional steelmaking regions may see employment shifts as blast furnaces close, while demand for higher-grade iron ore and expanded beneficiation is expected to rise. The move toward electric and hydrogen-based steelmaking will require vast new renewable energy systems, alongside major changes to transport and logistics infrastructure. These shifts are already affecting the mining sector, especially with the reduced demand for coal, as is the increasing demand for critical minerals and metals. While these developments may be necessary for the shift to a lower carbon economy, we also have to be aware of the danger of redistributing, rather than eliminating, other associated social and environmental impacts along the value chain. This highlights the need for holistic, value chain-wide approaches to managing transition impacts.

Steel is seen as a key component of the modern circular economy, given its recyclability and use in digital and renewable energy technologies and e-mobility (Corneille and Agrawal, 2024). The transition to modern energy systems will therefore impact the demand for steel across economies, from both primary iron and recycled sources. Meanwhile, interest has increased in mining for critical raw materials for transition technologies (Quiroz and Mesa, 2023). New developments can bring new economic opportunities, and environmental and health benefits. However, they can also have negative impacts on workforces, local communities and supply chains, while the opportunities are not available to all on an equal basis (Strambo et al 2024; Wang and Lo 2021; Norris et al 2024).

Indigenous peoples and others who already practice sustainable, circular livelihoods feel that their ways of life are being put under threat in order for others to 'transition' to a low-carbon version of the prevailing mode of development that prioritises financial capital above other forms of value (Engstrom 2023). There is an increasing recognition globally of the need for heavy industries to address human rights, Indigenous rights and social equity, and to prioritise the needs of historically marginalised communities (Cha et al 2021; Gobeil and Thomassin 2024). Companies are being urged to integrate local knowledge into the design of transitions and related due diligence processes, and to adequately monitor and manage the impacts of their activities throughout the value chain (Klocker Larsen et al, 2017; Bhatnagar et al, 2024; Filho and Pons-Giralt 2024). There are increasing calls for inclusive and collaborative approaches to transitions, equitable benefit sharing, and co-ownership transition models (Carling, 2024).<sup>3</sup>

## Just transitions and the role of VSSs

The International Labour Organisation (ILO) defines the just transition as: "greening the economy in a way that is as fair and inclusive as possible to everyone concerned, creating decent work opportunities and leaving no one behind."<sup>4</sup> The term 'just transition' originated with the US labour movement in the 1980s to protect workers' jobs and livelihoods, as economies shifted to greener production with increased environmental regulation (García-García et al 2020). As the movement has evolved, there has typically been a strong focus on workers' rights during energy transitions (McCauley et al, 2024). This mostly relates to **transitioning out** of high-emitting industries. In recent years, human rights and Indigenous rights groups have sought to broaden the scope of 'just transitions' to take into account a wider range of transition activities.

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3 See also the [Declaration from the conference 'Indigenous Peoples and the Just Transition'](#) (New York, 12–13 April 2024)

4 <https://www.ilo.org/resource/other/ilo-helpdesk-business-and-just-transition>

This includes **transitioning in** to industrial activities that serve transitions, such as iron ore mining for fossil-free steelmaking, the siting of renewable energy infrastructure, and the extraction of critical raw materials (Bainton et al, 2021; Ossbo, 2023; Owen et al, 2023). There has also been increasing concern on the part of workforces and other stakeholders about the impacts of digitalisation and other technological and economic transitions (Verdolini, 2023).

While 'the just transition' is typically portrayed as a global endeavour, there are marked differences in how it is perceived and implemented in different places, depending on the sector and the local culture and society. The social context of transitions is therefore a critical consideration in how to prepare and respond. Indigenous and human rights advocates and transition researchers increasingly argue the need for transition proponents and stakeholders to co-create effective and inclusive transition strategies (Selvaraju and Robins, 2024; Filho and Pons-Giralt, 2024; Moore-Cherry et al, 2025).

With sufficient buy-in, VSSs can be an important mechanism for raising awareness about just transitions among companies and other stakeholders, and for supporting the protection of workers, affected local communities, and Indigenous peoples during transitions. VSSs can provide companies with a set of guiding principles and measurable actions to help them identify, prepare for, and effectively manage transition risks and opportunities. Well-designed VSS requirements can be flexible enough to be adapted and applied effectively in different geographical areas and specific local contexts. They can help to fill gaps in local policy and planning procedures, as well as raising awareness and offering a benchmark for policy reform.

## 2. Methodology



The project comprised three key phases, which are described below.

## 2.1 Phase 1: Literature review and mapping

Phase 1 (October 2024 – February 2025) involved a literature review and the mapping of existing just transition frameworks and VSSs. The analysis was initially designed around two internationally recognised just transition frameworks (seen as fundamental to the interpretation of the just transition concept), combined with academic justice theory. These key sources were identified in the early stages of the literature review:

- International Labour Organisation (ILO) (2015) *Guidelines for a just transition towards environmentally sustainable economies and societies for all* (seven guiding principles)
- UN Working Group on Business and Human Rights (2023) *Extractive sector, just transition and human rights* (12 recommendations for businesses, including investors)
- Academic justice theory (three key dimensions of justice: procedural, distributive, restorative)

The literature review covered over 200 documents (international standards and principles, academic and practitioner literature, online resources and media articles). It included an overview of just transition policy and practice in nine countries (key producers of steel, iron-ore and coal) and seven sub-national regions; and a comparative analysis of key stakeholder perspectives (industry, labour, Indigenous peoples, advocacy and academic groups).

A key activity in Phase 1 was the mapping of 16 existing just transition frameworks (including those of the ILO and UN human rights working group, as well as a range of other diverse stakeholder groups). The mapping enabled the comparative analysis of principles, indicator sets and formal statements developed by different groups, as listed in Table 1. The frameworks were selected for their relevance to debates on just transitions in the context of steelmaking and mining and to ensure a representative range of stakeholder perspectives. A Draft Just Transition Framework was then prepared, and 10 existing VSSs were mapped against it.

**Table 1: Existing just transition frameworks referenced to develop the Draft Just Transition Framework for Phase 1**

Category	Framework
International principles	International Labour Organisation (ILO) (2015) <a href="#">Guidelines for a just transition</a> (seven principles to guide the transition)
	UN Working Group on Business and Human Rights (2023) <a href="#">Extractive sector, just transition and human rights</a> (UNWGBHR 2023)
	COP29 Declaration: <a href="#">Supporting the Conditions for a Just Transition Internationally</a>
VSS	The Gold Standard <a href="#">Just Transition Requirements methodology tool</a> (draft as of 2024)
Organised labour	The Just Transition Alliance <a href="#">Principles</a>

Category	Framework
Indigenous peoples' declarations	<a href="#">Declaration from the conference 'Indigenous Peoples and the Just Transition' (Recommendations for investors and companies)</a> UNEP, Indigenous Peoples Rights International, Right Energy Partnership with Indigenous Peoples, Business and Human Rights Resource Centre (New York, 12–13 April 2024)
	<a href="#">Indigenous Peoples Principles and Protocols for Just Transition</a> (Principles for governments and companies), from summit: Just Transition: Indigenous Peoples' Perspectives, Knowledge, and Lived Experiences (Geneva, 8–10 October 2024)
Business-facing initiatives	World Benchmarking Alliance (2025) <a href="#">Just Transition Methodology</a>
	Climate Action 100+ <a href="#">Net Zero Company Benchmark</a>
	Business for Inclusive Growth <a href="#">Just Transition Indicators</a>
	Climate Investment Funds (2024) <a href="#">Just Transition Guidance Note</a>
	Council for Inclusive Capitalism <a href="#">Just Energy Transition Company Framework</a>
	European Bank for Reconstruction and Development (2020) <a href="#">Just Transition Initiative</a> (Indicators)
Research and advocacy organisations	Stockholm Environment Institute (2020) <a href="#">Seven principles to realize a just transition to a low-carbon economy</a>
	Just Transition Finance Lab (2024) <a href="#">Unjust minerals: investing in the changes needed for a just transition in the mining sector</a> (Priorities for a just transition in mining)
	Lead the Charge (2024) <a href="#">Leaderboard on Automotive Supply Chains</a> (Indicators)

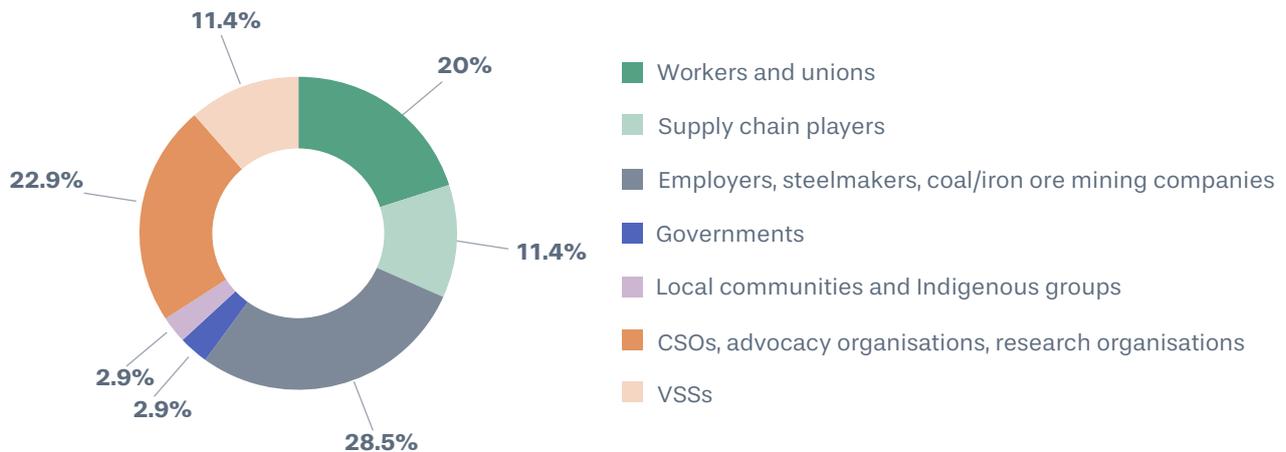
The key outputs from Phase 1 were:

- **A Draft Just Transition Framework** including 12 principles and 53 related core elements, based on the mapping of the 16 existing just transition frameworks (see [Section 3.3](#))
- **The mapping of 10 selected VSSs** against the Draft Just Transition Framework to assess current VSS practice and ability to support and promote just transitions (see [Section 3.4](#))

## 2.2 Phase 2: Stakeholder engagement

Interviews were conducted with 35 key mining and steelmaking stakeholders, who were carefully selected using the substantial networks of ResponsibleSteel and IRMA. Interviewees were from 16 different countries, with a significant number from South Africa, reflecting the depth of experience of IRMA in that country. There was emphasis on ensuring broad representation from different sectors relevant to mining and steelmaking (see [Figure 1](#)).

**Figure 1: Distribution of interviewees by sector**



The interviews were semi-structured, using a questionnaire based on the findings of Phase 1. The interviews themselves were free flowing, enabling respondents to focus on areas that were most relevant to their own background and experience. A preliminary analysis of the interview transcripts was carried out using the Atlas.ti software, and this was used to guide the workshop agendas.

The two workshops were held in Johannesburg and Brussels (see Table 2).

**Table 2: Details of project workshops**

Workshop	Dates	Participants	Stakeholder groups represented
Johannesburg, South Africa	7 May 2025	30	Mining companies, end-users, finance, organised labour, NGOs, and mining-impacted communities
Brussels, Belgium	4 June 2025	20	Civil society, organised labour, industry, NGOs, and public sector

The aim was to ensure participation from a representative selection of stakeholders:

- **Johannesburg** was chosen as a location because of South Africa's substantial experience of just transition policymaking and planning, IRMA's experience in South Africa, and the relative logistical ease of organisation compared to alternatives.
- **Brussels** was selected because of its relatively neutral status, its central European location (ease of access by a wider selection of potential participants), and its significance as a centre for European policy-making.

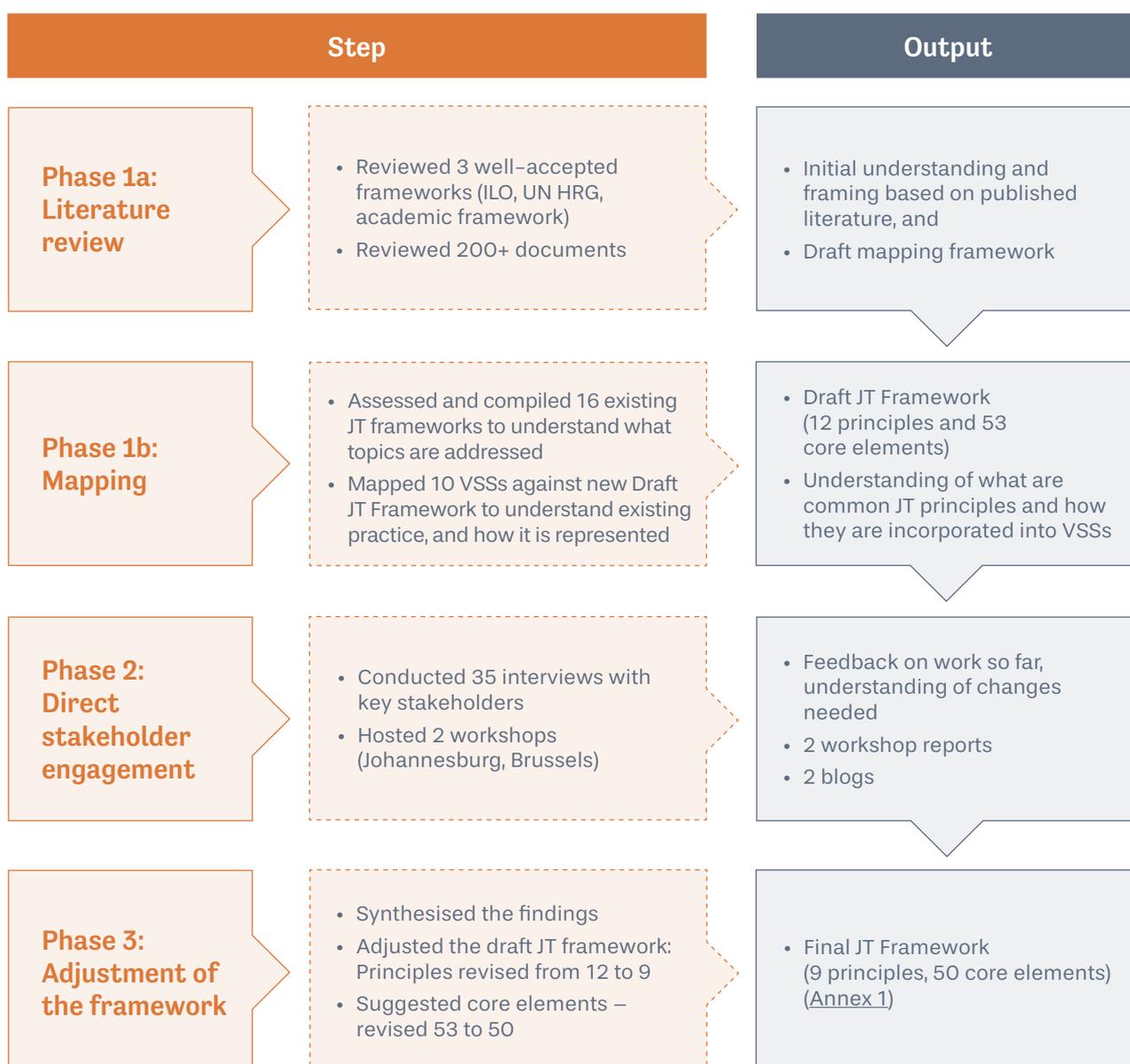
Insights and feedback from the interviews and workshops strongly influenced the final **Just Transition Framework and Recommendations for VSSs**.

## 2.3 Phase 3: Synthesis

Phase 3 (June – August 2025) involved the synthesis of the key findings from Phases 1 and 2 and the finalisation of key outputs:

- A final **Project Report** (this document) presenting the key project findings and outputs.
- A **Just Transition Framework for VSSs** (See [Table 9](#) for the summary table and [Annex 1](#) for the full detail) that are seeking to develop a just transition standard, principle and/or related core elements. Revisions to the Draft Framework were based on stakeholder feedback and insights from interviews and workshops.
- A set of five **Recommendations for VSSs** (See [Section 5.2](#) of this document), including governance and assurance provisions. The recommendations are based primarily on stakeholder interview responses relating to standard development, implementation and governance.

### Process:



### 3. Key findings: Literature review and mapping



The key findings from Phase 1 are outlined in this section, including: current gaps in policy and practice (Section 3.1) and the perspectives and priorities of different stakeholder groups (Section 3.2). We present the results of the mapping of 16 just transition frameworks (Section 3.3) and the mapping of 10 VSSs (3.4).

## 3.1 Gaps between just transition policy and practice

Many just transition frameworks and declarations have been developed in recent years by a wide range of stakeholder groups relevant to steelmaking and mining. However, a key finding from the literature review (and the project overall) is that practical implementation is still lagging behind established just transition principles, despite progress in some areas.

### 3.1.1 National and sub-national policy and practice

At the national level, countries are adopting just transition programmes, such as the EU Just Transition Mechanism<sup>5</sup> and the Just Energy Transition Partnerships (e.g., South Africa and Indonesia).<sup>6</sup> There is an increased level of buy-in to decarbonisation within major steel-producing countries, but only an *emerging* interest in just transition planning and supply chains in the steel sector.<sup>7</sup> While there is more *awareness* of the just transition concept in relation to phasing out coal (e.g., in Australia, Germany, South Africa, Indonesia and China) – largely because this has been going on for longer – just transition *performance* is not significantly better (Cha, 2020; Strambo et al 2024; Wang and Lo, 2021). At the sub-national level, there are positive examples of efforts by regional governments. This includes Scotland<sup>8</sup> and the state of South Australia,<sup>9</sup> where multi-stakeholder social dialogue has been enabled, and in Chungnam Province, South Korea,<sup>10</sup> where there have been efforts to build policy coherence locally and facilitate collaboration globally.

A major challenge for governments across the board in all jurisdictions is ensuring adequate social dialogue (with both workers and affected communities) (Snell 2018; Wiseman et al 2020; Sharma et al 2023). Issues often relate to the timing of transitions, and the failure of both governments and industry proponents to engage with workers and affected communities well in advance of critical decisions being made (Wiseman et al 2020; Norris et al, 2024; Selvaraju and Robins, 2024). National and local transition initiatives also face the common challenges of a lack of policy coherence and low levels of supply-chain collaboration. For instance, a 2023 report from the UN Working Group on Business and Human Rights criticised the inconsistent design and implementation of energy transition programmes for failing to ensure responsible business practice (UN WGBHR 2023). Policy uncertainty and a lack of coherent regulations and standards around green steel production have also been highlighted potentially undermining companies' ability to make long-term investment decisions, thus exacerbating the challenge of short time-scales and hurried decision-making in transitions (WBA, 2024).

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5 [https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/finance-and-green-deal/just-transition-mechanism\\_en](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/finance-and-green-deal/just-transition-mechanism_en)

6 <https://www.ihrb.org/resources/what-are-jetps-just-energy-transition-partnerships>

7 See, for instance: <https://www.socialprogress.org/just-transition-score>

8 <https://www.justtransition.scot/>

9 <https://yoursay.sa.gov.au/energytransition>

10 <https://www.theclimategroup.org/under2-coalition/region/chungnam>

### 3.1.2. Just transition performance of heavy industries

In 2024, the World Benchmarking Alliance published an assessment of the transition performance of heavy industries, including steelmakers (WBA, 2024). The indicators used in this assessment were included in our mapping of 16 existing just transition frameworks (see [Section 3.3](#)). The WBA assessment report revealed that half of the 450 companies that were assessed scored 0 on all just transition indicators, and only 18% of the companies had committed to engaging in social dialogue. The study highlighted challenges with workforce reskilling and the involvement of workers in transition planning. It highlighted the need for companies to understand impacts through value chain analysis and a human rights focus, to adequately address direct and indirect impacts on workers and communities.

A 2024 report from Lead the Charge's 'Leaderboard on automotive supply chains' evaluated 18 leading automakers on emissions, environmental harms and human rights in their supply chains (Lead the Charge, 2024). The Lead the Charge evaluation framework was also included in our mapping of existing frameworks ([Section 3.3](#)). The high-level conclusion from the 2024 evaluation was that the results indicated "progress on green steel and inaction on just transition".<sup>11</sup>

Overall, the literature review revealed that steel-producing companies have a strong technological approach to decarbonisation but perform less well on just transition planning and meaningful engagement with workers and communities. As noted above, the coal mining sector – and therefore mining companies – have longer experience of decommissioning and 'transitioning out' and greater familiarity with the just transition concept. However, mining companies continue to fall short in particular on adequate and timely engagement with workers and affected communities (Wang and Lo, 2021; Strambo et al, 2024).

## 3.2 Stakeholder priorities: Commonalities and differences

The Phase 1 literature review and mapping revealed that different stakeholders and stakeholder groups have some common priorities and some very different priorities for just transitions. Key just transition stakeholder groups for mining and steelmaking are: national and international worker organisations, trade unions and worker representatives; individual workers and their families and communities; transition-affected communities, Indigenous peoples and their designated representatives, historically marginalised communities and vulnerable groups; mining and steelmaking companies, value chain actors (buyers, producers, contractors, subcontractors, suppliers); national and local governments and regulators; shareholders, investors, and donors; civil society organisations, academia, research and advocacy groups, other regional and sector experts, consultants and certification bodies' VSS auditors.

Table 3 provides an overview of the priorities and emphasis of different stakeholder groups, based on the Phase 1 literature review and mapping.

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11 <https://leadthecharge.org/2024-leaderboard-results-highlights>

**Table 3: Just transition priorities and emphasis of different stakeholder groups**

Stakeholders	Key just transition priorities and emphasis
International and national workers' organisations	<ul style="list-style-type: none"> <li>• Decent jobs, safe and healthy work, gender equity, strong worker representation in decision-making</li> <li>• Low-carbon industries as opportunity for local economies and job creation; focus on reskilling and retaining value locally</li> <li>• Communities and trade unions as initiators, financiers, manufacturers and beneficiaries of low-carbon economy</li> <li>• Wellbeing of workers and communities; focus on the vulnerable and marginalised – including Indigenous people</li> </ul>
Industry actors and industry-focused think-tanks	<ul style="list-style-type: none"> <li>• Emphasis on decarbonisation of heavy industry; <i>emerging</i> focus on just transition and circular economy, workers' rights and human rights</li> <li>• Just transitions positioned within existing growth paradigm and modern market economies ('inclusive growth'); calls to accelerate decision-making</li> <li>• Some value-chain initiatives promote international collaboration and dialogue across supply chains</li> </ul>
Advocacy organisations targeting heavy industry	<ul style="list-style-type: none"> <li>• Multi-stakeholder dialogue, including at sub-national and community level</li> <li>• Strong focus on technological carbon-reduction, campaigns against sourcing 'dirty' steel and 'greenwashing'</li> <li>• Indigenous rights feature strongly in mining campaigns, less strongly in relation to industrial manufacturing, including steelmaking</li> </ul>
Business and human rights groups	<ul style="list-style-type: none"> <li>• Tripartite social dialogue and community engagement, inclusive just transition planning and implementation</li> <li>• Increasing emphasis on Indigenous rights, equitable development, care for the vulnerable and marginalised</li> <li>• <i>Emerging</i> focus on sustainable consumption, equitable benefit sharing (including co-ownership and equity models), acknowledging past injustices, and transformational systems change</li> </ul>
Indigenous peoples	<ul style="list-style-type: none"> <li>• Transformational agenda, proposing a break from business as usual and 'western' economic models</li> <li>• Indigenous self-determination; participation in deciding and designing solutions; meaningful implementation of free, prior and informed consent (FPIC)</li> <li>• Transitions are not 'just' if embedded in capitalist modes of development that continue to favour expansion into Indigenous territories (often dubbed 'green colonialism')</li> </ul>

Given that just transition stakeholders have such different priorities and emphasis, the way that stakeholder perspectives are included in decision-making will affect how a just transition is defined, planned, and implemented. This suggests that companies may choose their level of social dialogue depending on the range and needs of stakeholders and what works for them.

Based on the literature review and mapping, we identified three levels of stakeholder engagement relating to just transitions: tripartite, inclusive and transformational. These categories illustrate a range of possible approaches without specifying which actors should adopt which level (see Table 4).

**Table 4: Levels of stakeholder engagement**

Tripartite	Inclusive	Transformational
<ul style="list-style-type: none"> <li>• Tripartite social dialogue (unions, business, government)</li> </ul>	<ul style="list-style-type: none"> <li>• Meaningful engagement with workers and communities, including the vulnerable and marginalised</li> <li>• Engagement throughout the value chain</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholders and rights-holders drive transitions</li> <li>• Strategic-level engagement (in collaboration with government) prior to project-level engagement</li> </ul>

### 3.3 Mapping of 16 just transition frameworks

The Phase 1 mapping of 16 existing just transition frameworks resulted in a list of 12 key principles with a total of 53 related core elements (the **Draft Just Transition Framework**). This is the precursor to our final **Just Transition Framework for VSSs** (see [Section 5](#)), which was finalised following stakeholder feedback on this draft framework.

The 12 key principles from Phase 1 were as follows, each containing relevant core elements (53 in total):

- Commitment to just transition and human rights standards
- Commitment to gender and social equity
- Stakeholder engagement and consultation on transition plans and activities
- Due diligence on proposed transition activities
- Governance and management of transition activities
- Just transition planning
- Sustainable economic opportunities and social protection for workers
- Protection and support for affected communities and economies
- Indigenous peoples' participation, partnerships and reparations
- Equitable access to benefits
- Responsible sourcing and resource use
- Environmental protection and restoration

As part of the analysis, we also recorded how many of the 16 frameworks included each of the 53 core elements, resulting in a 'frequency score' (out of 16) for each criterion that reflects the frequency with which it appears across the 16 frameworks. Only one criterion appeared in all 16 of the just transition frameworks that we analysed, namely: *Social dialogue, meaningful stakeholder consultation and engagement*.

Table 5 below illustrates the other more common core elements (which are included in more than 8 of the 16 frameworks). Column 2 indicates the frequency score (**F**) out of 16.

**Table 5: Most common core elements across 16 just transition frameworks**

<b>Most common just transition core elements</b>	<b>F</b>
<b>Social dialogue, meaningful stakeholder consultation and engagement</b>	<b>16</b>
Retaining, retraining and skills development for workers	11
Inclusive and transparent planning and decision-making, with workers, trade unions, affected communities, suppliers and civil society	11
Inclusive assessment of social risks and opportunities, involving affected people	10
Social equity: inclusion, non-discrimination, and empowerment of vulnerable groups	10
Respect for human rights and alignment with international human rights principles	10
Environmental protection; access to clean air, water, land, and food; biodiversity preservation	9
Special attention to marginalised and vulnerable groups	9
Mitigation and management of environmental and social impacts of decarbonisation	9
Just transition plan to mitigate social impacts of transition	9
Gender equity	9
Respect for and promotion of fundamental principles and rights at work, including freedom of association and collective bargaining	9

Table 5 provides a useful insight into the core elements that have been included in a significant number of just transition frameworks to date. However, it does not reflect the strong priorities of certain interest groups (e.g., Indigenous peoples), which were contained in some but not all the frameworks – it only reflects priorities that are common across a range of different interest groups.

While all of the more common just transition requirements are valid and important, the less common requirements are particularly important to certain stakeholder groups in specific contexts, and in relation to specific industrial activities. These therefore also need to be considered if those stakeholder groups are affected by a particular development.

To enhance the analysis, we categorised each criterion according to the dimensions of transition justice (procedural, distributive and restorative), with an additional 'rights and equity' category (relating to commitments made to international standards, rights and equity) (see [Table 6](#)).

**Table 6: More common and less common core elements compared**

Frequency	Type of justice	Example core elements
<p><b>More common</b> (in 9–16 frameworks)</p>	<p>Mostly related to <b>rights and equity, procedural justice,</b> and some <b>distributive justice</b></p>	<ul style="list-style-type: none"> <li>• Respect for and promotion of human rights; align with international human rights principles</li> <li>• Gender equity</li> <li>• Social dialogue, meaningful stakeholder consultation and engagement</li> <li>• Inclusive assessment of social risks and opportunities, involving affected people</li> <li>• Just transition plan to mitigate social impacts of transition</li> <li>• Retaining, retraining and skills development for workers</li> <li>• Special attention to marginalised and vulnerable groups</li> </ul>
<p><b>Less common</b> (in 1–8 frameworks)</p>	<p>Mostly related to <b>restorative justice</b> and <b>distributive justice</b></p>	<ul style="list-style-type: none"> <li>• Specific requirement for free, prior and informed consent</li> <li>• Value-chain wide due diligence</li> <li>• Support workers' families</li> <li>• Support for local businesses and suppliers affected by transitions</li> <li>• Equitable access to low-carbon goods and services</li> <li>• Equitable benefit sharing, including co-ownership and co-equity models</li> <li>• Reparations and restoration for Indigenous peoples, including historical reparations</li> </ul>

As illustrated in Table 6, the more common just transition core elements relate primarily to rights and equity and procedural justice, with some relating to distributive justice. By contrast, the less common requirements relate more to distributive and restorative justice. These include: value-chain approaches; equitable access to benefits; Indigenous people's participation in decision-making; and historical reparations.

This underscores the importance of ensuring targeted stakeholder engagement in developing a Just Transition Framework (by VSSs) or a just transition plan (by VSS certified entities) for a particular purpose to capture the priorities of all the key stakeholders, including those with less common priorities.

### 3.4 Mapping of VSSs

A key objective of this project was to map the existing work of VSSs and to better understand their role in the promotion and support of just transitions. To build this understanding, we carried out an assessment of 10 selected VSSs (including three that have already adopted just transition considerations in their standards) against the 53 core elements in our Draft Just Transition Framework. This enabled us to identify: 1) potential approaches that VSSs can take in developing their own just transition frameworks; 2) areas where VSSs are already well prepared to support and promote just transitions; and 3) areas where more work is needed to develop appropriate just transition principles and core elements.

### 3.4.1 Just transition principles of existing VSSs

Three members of the ISEAL Alliance have already adopted the just transition concept itself: **Bettercoal**,<sup>12</sup> the **Roundtable on Sustainable Biomaterials (RSB)**<sup>13</sup> and the **Gold Standard**<sup>14</sup> for climate security and sustainable development (Table 7).

**Table 7: Approaches to incorporating just transition into VSSs**

Type of approach	VSS	Detail
Updated principles	<a href="#">Bettercoal Standard: The Code 2.0</a>	Bettercoal updated two of their existing principles, relating to a) mine closure and b) labour rights to promote justice in key aspects of transitions
Methodology for discrete transition actions	<a href="#">Gold Standard draft just transition methodology</a>	Gold Standard developed a draft methodology to apply to specific cases where coal-fired power stations are being phased out and replaced with renewables
Mission expansion	<a href="#">Roundtable on Sustainable Biomaterials (RSB)</a>	RSB incorporated circular economy and just transition concepts into their overall mission and purpose

As indicated in Table 7, these existing VSS just transition updates represent three distinct approaches to the adoption and application of the just transition concept. A fourth approach would be to review existing principles and requirements against a set of just transition principles and core elements without explicitly incorporating the term 'just transition' into the standard.

An additional point to note is that IRMA's governance framework has been recognised by the Just Transition Finance Lab as being "uniquely aligned with the just transition principle of centering the voices of affected workers and communities".<sup>15</sup> This emphasises the importance of overall standard governance to the support and promotion of just transition principles.

### 3.4.2 Mapping of 10 VSSs against the Draft Just Transition Framework

We mapped Bettercoal, the Gold Standard and RSB, along with seven other selected VSSs against the 53 just transition core elements identified in our Draft Just Transition Framework. The aim of this exercise was to test the draft framework itself, while also providing a preliminary impression of current VSSs coverage of just transitions. The mapping was carried out internally, and the results were then used to refine and strengthen the framework.

<sup>12</sup> <https://www.bettercoal.org/bettercoal-code/>

<sup>13</sup> <https://rsb.org/>

<sup>14</sup> [https://goldstandard.org/sites/default/files/documents/consultation\\_-\\_jt\\_requirements.pdf](https://goldstandard.org/sites/default/files/documents/consultation_-_jt_requirements.pdf)

<sup>15</sup> <https://responsiblemining.net/plaudit/the-just-transition-finance-lab/>

The selected VSSs were:

- [IRMA Draft Standard v2.0](#) (currently undergoing a second round of public consultation)
- [The Copper Mark Risk Readiness Assessment Criteria Guide v3.0](#)
- [ResponsibleSteel International Production Standard V2.1](#)
- [The ASI Performance Standard V3.1](#)
- [Fairmined Standard For Gold From Artisanal And Small-Scale Mining, Including Associated Precious Metals Version 2.0](#)
- [Responsible Jewellery Council Code of Practices](#)
- [Equitable Origin EO100TM standard](#)

The mapping revealed that several just transition aspects are already included in the standards of ISEAL members. Even if they do not refer to the term 'just transition', they support and promote key elements of the just transition agenda.

Overall, the coverage of just transitions is visible in four key areas of existing VSS core elements, namely: 1) mine/plant closure and reclamation; 2) retrenchment; 3) new project development and due diligence; and 4) land acquisition, displacement and resettlement. Many of the existing VSS provisions, which apply to regular project development actions, can equally be applied to discrete transition actions (e.g., closure of mines or steel plants, new mine development, introduction of new technology). However, VSSs and their stakeholders need to consider the extent to which the specifics of these provisions fully meet stakeholders' just transition needs.

Additionally, VSSs and current frameworks performed well on the 'most common core elements' identified in [Table 5](#). In several areas, VSSs and current frameworks had different levels of coverage. Table 8 presents a comparison of VSSs and existing frameworks.

**Table 8: VSS coverage of just transitions compared to existing just transition frameworks**

VSSs vs existing just transition frameworks	Key areas
Areas where VSS coverage is more extensive than existing just transition frameworks	Environmental due diligence, protection and restoration; Human rights due diligence; Occupational health and safety; Grievances; Monitoring, reporting and verification; Responsible sourcing and resource efficiency
Areas where VSS coverage is less extensive than existing just transition frameworks	Retaining, retraining and skills development for workers; Green and decent job creation; Value-chain-wide due diligence; Support for workers' families; Equitable access to low-carbon goods and services
Weak areas for both VSSs and existing just transition frameworks	Requirement for robust governance and coherent policies related to transition activities; Sharing knowledge and good practice; Strengthening social dialogue through capacity building; Collaboration with education and training institutions; Enabling stakeholders to drive transitions; Equitable benefit sharing, including co-ownership and co-equity; Indigenous peoples as partners; Historical reparations

# 4. Key findings: Stakeholder insights and feedback



The stakeholder engagement phase of the project was a way to test and challenge the findings of Phase 1 and to seek feedback on the Draft Just Transition Framework. It also enabled us to ask stakeholders (particularly in the interviews) to provide their detailed reflections on VSS development, implementation and governance.

## 4.1 Defining and interpreting ‘just transition’

A strong finding from the interviews and workshops was the need to ensure that ‘justice’ remains at the heart of transitions, with stakeholders emphasising human rights, fairness, equity, inclusiveness and cultural sensitivity. Interviewees and workshop participants repeatedly emphasised that meaningful engagement and consultation with all stakeholders, especially workers, affected communities and vulnerable groups, is essential to ensure adequate protection and respect of human rights, and the balancing of power relations. In addition, participants stressed that definitions of just transition should build on the existing definitions established by recognised actors such as the ILO. It is important to note that participants were not asked to create definitions, rather, existing definitions were presented for discussion and reaction, providing a structured basis for dialogue while allowing participants to refine, contextualise, and reinforce the elements they considered most critical.

However, there was some disagreement on the overall definition of the term ‘just transition’ with some emphasising a focus primarily on workers and core labour rights and decarbonisation, and others stressing the need to equally prioritise the concerns of communities, Indigenous peoples, rights holders and marginalised groups. Most interpretations of just transitions related broadly to “balancing climate goals and social equity”, with a perspective wider than the operation itself. Brussels workshop participants noted that a just transition should be an ongoing process, with concrete steps to uphold the commitment to “leave no one behind”.

The range of perspectives also shows that just transition principles can be applied at different scales: (a) **sector or industry wide**, relating to overall operations and values in the context of a decarbonising society, e.g., regarding the extraction of critical raw materials, manufacture and use of green steel, use of hydrogen for energy; and (b) **site specific**, relating to discrete transition activities, such as the closure of a mine, decommissioning of a steel plant, opening of a new mine, or introduction of new technology.

Workshop participants felt that any definition of just transition used by VSSs needs to be practical, with strong integration of worker rights and social protections, and ensuring collective approaches involving supply-chain actors. It should be applicable globally and not only to decarbonisation but also to other transitions (e.g., digital, economic, automation, AI, efficiency improvements). Stakeholders agreed strongly that just transitions are highly context-specific (depending on the geography, the sector and the people affected). Thus, a definition of just transitions should be flexible and not prescriptive. Some stakeholders questioned whether VSSs should be defining ‘just transition’ at all. Brussels participants emphasised the importance of using appropriate and agreed terminology, observing that a recurring challenge with just transition frameworks was the interpretation and understanding of key terms. The appropriate terminology may depend on the local context or the particular sector, and the stakeholders concerned. As such, *shared* definitions and *clarity in terminology* will be essential in the development of globally relevant VSS frameworks.

VSSs therefore need to consider two levels of definition/interpretation of just transitions:

- **Framing VSS principles and core elements:** VSSs need to frame their just transition principles and core elements and provide clear guidance on how they need to be implemented. This may or may not require an agreed definition of the term 'just transition'. A broad (not limiting) definition could be helpful in providing clarity, while terminology also needs to be clear and appropriate for stakeholders. These would ideally be co-developed through a transparent, inclusive process of consultation with key VSS stakeholders.
- **Guidance for VSS certified entities:** VSSs should include a requirement for their certified entities to agree with stakeholders the objectives of a just transition plan (which may or may not require agreement on the term 'just transition' itself). Certified entities should also be required to work together to co-create the Plan and to implement it in an inclusive manner.

## Stakeholder Quotes



When we talk about Just Transition, we also have to talk about 'Just Resilience' making sure adaptation projects protect communities, not just our assets.

**Steelmaker**



Just Transition is a confusing term. It does not reflect the realities we face.

**Indigenous Rights Holder**



At its core, it is about achieving social justice as we transition whether to a greener economy or low-carbon, climate-resilient development.

**Mining Company**



We must co-create a shared definition with industry stakeholders to avoid implementation paralysis.

**Civil Society Organisation**



Just Transition should be framed within the context of global justice. However, it often manifests as a national project, missing opportunities to address historical and global inequities.

**Academic**



A transition that is fair but not sustainable will not work... the term should really be 'Just and Sustainable Transition.'

**Steel Industry Association**

## 4.2 The importance of context

Interviewees and workshop participants repeatedly referred to the different cultures, practices and regulatory frameworks in different countries that affect the implementation of just transitions. A key question raised in the Johannesburg workshop was: "How can local context be effectively reflected in a global standard?" Participants identified the need for VSSs to ensure the flexibility to adapt to local contexts (geographical, societal, cultural) and to ensure applicability in different sectors, by companies of different sizes.

Interviewees suggested that the specific transition context, and key contextual influences, need to be mapped in order to adequately assess risks and impacts, and determine appropriate just transition measures and approaches. Key contextual influences include: the sector and size of an operation; national and local policies and just transition commitments; local cultural practices and beliefs; historical patterns of development; levels of community awareness and education; and civil society activism.

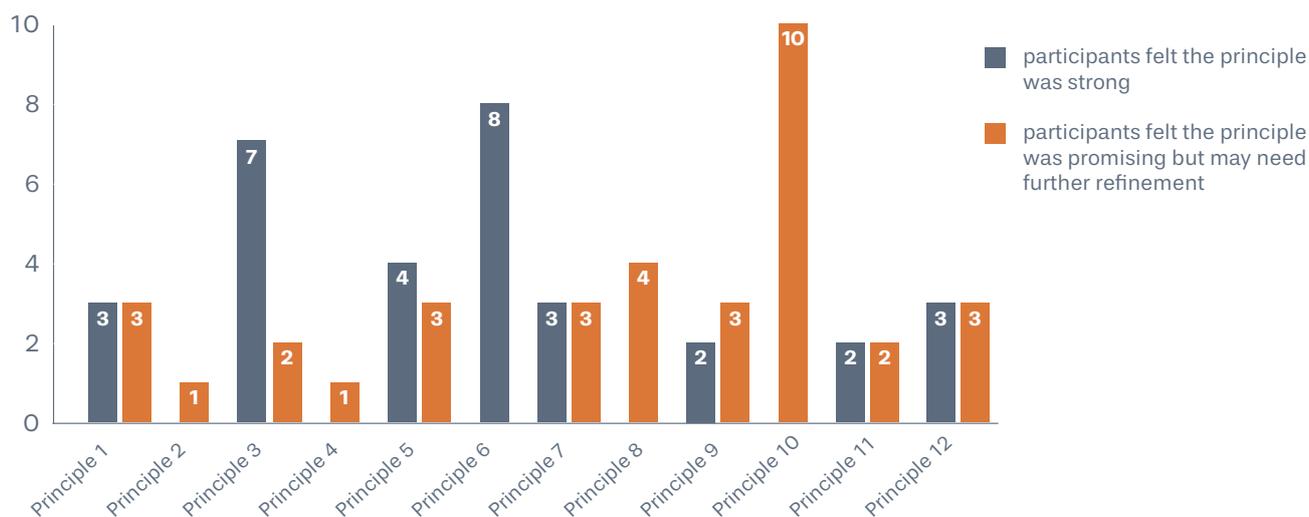
VSSs need to be able to balance globally consistent expectations with local regulatory differences and be able to compensate for weaker regulation in certain jurisdictions. At the same time, the practices that are required by VSSs need to be locally relevant. As such, VSS core elements need to be pragmatic, rather than prescriptive or complicated. This can be achieved if they are developed in consultation with stakeholders who have a good knowledge of the contextual influences.

## 4.3 Stakeholder feedback on the Draft Just Transition Framework

Interviewees and workshop participants were in alignment with existing just transition frameworks and VSSs on commitments to human rights and fundamental principles and rights at work, gender and social equity; social dialogue and meaningful stakeholder engagement; inclusive just transition planning; retaining, retraining and skills development for workers; and special attention to marginalised and vulnerable groups. The interviews and workshops also revealed certain differences in emphasis in the priorities of the selected mining and steelmaking stakeholders.

Participants in the Brussels workshop carried out a 'temperature check' of the 12 just transition principles in the Draft Just Transition Framework (see [Section 3.3](#) for the initial list of 12 principles). The findings from Brussels are illustrated in [Figure 2](#), where grey indicates that participants felt the principle was strong, and orange indicates that it was promising but may need further refinement. Participants were limited in the number of votes they could make.

**Figure 2: Temperature check of just transition principles (Brussels workshop)**



<b>Principle 1:</b> Commitment to just transition and human rights standards	<b>Principle 7:</b> Sustainable economic opportunities and social protection for workers
<b>Principle 2:</b> Commitment to gender and social equity	<b>Principle 8:</b> Protection and support for affected communities and economies
<b>Principle 3:</b> Stakeholder engagement/consultation on transition plans and activities	<b>Principle 9:</b> Indigenous peoples' participation, partnerships and reparations
<b>Principle 4:</b> Due diligence on proposed transition activities	<b>Principle 10:</b> Equitable access to benefits
<b>Principle 5:</b> Governance and management of transition activities	<b>Principle 11:</b> Responsible sourcing and resource use
<b>Principle 6:</b> Just transition planning	<b>Principle 12:</b> Environmental protection and restoration

As indicated in Figure 2, three priority areas were emphasised by the Brussels participants, namely just transition planning, stakeholder engagement, and governance and management of transition activities. In all of these areas, participants emphasised the importance of meaningful consultation, respect for rights holders, including free, prior and informed consent (FPIC) for Indigenous communities, inclusive decision-making, capacity building, transparency and access to information.

Respondents provided feedback in some key areas, summarised in the following list:

- Overall governance of transitions and related safeguards and capacity building:** Workshop participants and interviewees emphasised the importance of overall governance of transitions, including ongoing social dialogue and inclusive decision-making; and the value-chain perspective in engagement, due diligence and decision-making. They highlighted the importance of occupational health and safety, including mental health, gender protections, and non-harassment of workers. They also repeatedly emphasised the importance of information sharing and capacity building for communities and other stakeholders to ensure that engagement is truly meaningful.
- Due diligence, planning, engagement and collective agreements:** Workshop participants noted several overlaps between areas such as planning, due diligence and engagement. Johannesburg workshop participants also suggested that due diligence could be mainstreamed through the Just Transition Framework. Brussels workshop participants highlighted the importance of integrating a just transition plan with other processes, e.g., human rights due diligence and collective bargaining agreements. They also drew a clear distinction between social dialogue and collective agreements, emphasising that social dialogue is not a substitute for formal agreements. Respondents felt that stakeholder engagement and due diligence should be mainstreamed throughout the principles and core elements.

- **Engagement with national and subnational governments:** Respondents emphasised the need for companies to engage with governments on strategic planning, skills development and cumulative impacts. They noted the importance of partnerships (with governments and other external actors) and *early* government engagement, to enable companies to manage transitions more effectively. Workshop participants in Brussels highlighted the priority for companies to proactively and transparently engage with stakeholders at subnational level on regional strategic development outlooks. This might relate to specific training and re-employment opportunities as well as early engagement on economic, low carbon and technological transition strategies.
- **Appropriate retraining programmes that meet local needs:** Interviewees were particularly concerned about retraining and upskilling of workers, referring to a lack of alignment between skills training and job availability, and a lack of awareness of local needs by those who develop and fund skills programmes. Training programmes may be developed at a global head office without sufficient consideration of regional needs, for example, in businesses that operate across multiple sites worldwide. Job opportunities in new sectors (such as renewables) are often overstated and may not make up for jobs lost in traditional sectors such as coal mining. Even if new jobs emerge, they may not be in the same regions or accessible to the same workers, while opportunities are often temporary and unsustainable. Some workers are not retrainable for the new roles, highlighting the need for safety nets, especially for older workers. These reflections also underscore the importance of companies engaging with governments to address these challenges together.
- **Historical reparations as part of just transitions:** There was disagreement among respondents on whether historical reparations were core to the just transition agenda, with some arguing that the focus of just transitions should be on decarbonisation and its social effects. However, others pointed out the intergenerational justice and climate justice elements to transitions, historical responsibilities for climate change and power imbalances in land use planning and economic transformation. Respondents emphasised the need to distinguish between stakeholders and rights-holders, acknowledging the specific rights of Indigenous peoples and Indigenous self-determination. They noted that not only Indigenous peoples, but also other affected and marginalised communities need to have historical impacts acknowledged and compensated in the context of just transitions.
- **Building internal capacities:** Internal company capacity (including skills, leadership and time) was also highlighted as a key issue, for instance in relation to engagement, grievance resolution and the implementation of FPIC. One interviewee recognised that despite their company's strong commitment to supporting stakeholders and communities, the company had limited social expertise, and it would be difficult to convince the management to hire someone for such a role. Time constraints also limit willingness to engage adequately. This indicates the need for companies to develop adequate expertise and leadership to manage just transitions.

The principles and core elements of the Draft Just Transition Framework were reviewed and revised based on these insights and feedback from the interviewees and workshop respondents.

## 4.4 VSS effectiveness

Some interviewees observed that big companies may join certification schemes to demonstrate credibility to investors rather than to drive real impact, which poses the risk of (accusations of) greenwashing. A few interviewees noted that standards encourage the tracking of performance and related disclosures, but this does not always lead to real performance improvements. This may be because the requirements are not site-specific enough, or locally relevant, or focused enough on practical implementation challenges. A respondent mentioned that standards may often rely on self-reporting, which can lead to more honest and realistic assessments than external audits, but standards can fail without robust external accountability and independent verification.

Some workshop participants noted that certification bodies and auditors need more training and support to engage meaningfully with Indigenous peoples, workers, and local communities. Areas flagged for strengthening included grievance mechanisms and clearer guidance on the application and monitoring of FPIC. A key concern was that VSS audits are not delivering the expected outcomes, and audit reports do not reflect the voices of affected communities and other stakeholders.

Several interviewees and workshop participants noted the importance of being mindful of companies' capacities to meet the requirements of VSSs, especially smaller companies and those struggling financially as a result of transition impacts. They also observed the need to make VSS requirements pragmatic, accessible and locally relevant.

Stakeholders observed that some issues cannot be addressed effectively by a VSS, because they are primarily a government responsibility, because companies have limited control in that area, or because the issues cannot be measured adequately. These include:

- Speed of government decision-making before companies are involved (strategic planning and cumulative impact management, development of public policies and programmes)
- Companies' limited influence over government-led consultation and consent processes, whereas poor government performance can affect companies' own reputation and performance
- Companies' limited control and influence over government job creation and workforce capacity building programmes
- Multi-level governance challenges (such as collaboration and communication between national and local governments)
- Building social consensus around the low-carbon transition, including new technologies and sites, through public education, media and information campaigns

These issues affect how companies can operate, therefore, early and ongoing engagement with governments to address these issues together needs to be a key VSS requirement.

## Stakeholder Quotes



Standards should be pragmatic rather than overly prescriptive.

**VSS**



Communities should be free to define their own priorities, rather than be overwhelmed by rigid requirements.

**VSS**



There is a significant pushback against addressing historical reparations in standards.

**VSS**



Different communities have different needs... standards should allow for flexibility while still maintaining clear guidelines.

**Affected Community Representative**



Standards should include mechanisms for companies to be audited.

**Affected Community Representative**



A good just transition standard should be process-driven like human rights due diligence, not overly prescriptive.

**Civil Society Organisation**



Voluntary standards allow companies to keep harming while pretending to improve. Moving from one harmful practice to another is not progress.

**Civil Society Organisation**



One of the challenges with voluntary standards is that they often lack teeth... To make just transition auditable, standards must specify what good practices look like.

**Labour Organisation**



Standards need to move beyond general statements and outline specific, measurable expectations.

**Labour Organisation**



VSSs often talk loosely about just transition without addressing the nuts and bolts of implementation.

**Labour Organisation**



Smaller companies often lack the capacity... we need simplified frameworks tailored to their realities.

**Labour Organisation**



Standards must specify what good practices look like and require companies to demonstrate how they are meeting those expectations.

**Labour Organisation**

## Stakeholder Quotes



Our main goal should be standard simplification. Mining companies keep saying things are too complex. So why add more layers? Instead of creating new standards, why not look at existing ones and see how just transition frameworks can feed into them? Standards must be implementable. That doesn't mean overly flexible or vague, but they must be reasonable. We need fewer 1000-page documents and more practical thinking.

**Mining Company**



The principles of just transition are fully embedded within human rights due diligence processes. This is not a one-off effort but an ongoing, continuous process.

**Steelmaker**



Rather than defining rigid requirements, the standard could define a process like requiring stakeholder engagement and planning. The challenge is making standards both locally adaptable and globally consistent.

**Mining Company**



Is just transition truly a separate topic, or is it fundamentally about applying human rights due diligence and ensuring meaningful stakeholder engagement throughout the process?

**Steelmaker**



Just transition frameworks should be aligned with the theory of change and demonstrate continual improvement.

**Mining Company**



It is challenging to assess past harms without a clear global framework for measuring environmental and social impacts. A comprehensive global framework for calculating environmental and social costs is necessary to guide restorative actions effectively. The issue is philosophical because there is no quantification methodology.

**Steelmaker**

# 5. Just Transition Framework and Recommendations for VSSs



Below we present a **Just Transition Framework for VSSs**, comprising 9 principles and 50 related core elements to help guide the process of incorporating just transition concepts into VSSs. This is a revised version of the initial Draft Just Transition Framework, which was revised following feedback from the interviewees and workshop participants. We also present a set of five **Recommendations for VSSs**, based on stakeholder insights, especially from the interviews.

The project identified several potential approaches to incorporating the just transition concept and terminology into standards and certification systems. VSSs can decide which of these options would be most appropriate for their own purposes:

- Option 1** A discrete new standard section on just transition
- Option 2** Integrating just transition principles into existing sections
- Option 3** A hybrid approach, combining different methods
- Option 4** Developing guidance for users of a specific standard system, including non-mandatory mechanisms

Alternatively, VSSs could evaluate an existing standard against just transition principles and core elements to assess compatibility with them, without introducing the 'just transition' concept and terminology.

Stakeholders affirmed that meaningful engagement with key stakeholders is essential to ensure that justice lies at the heart of any transition approach. It is clear that different circumstances have different sets of key stakeholders, with different perspectives and priorities to be incorporated into planning. As a starting point, VSSs should consider what level of stakeholder engagement is most appropriate to their just transition approach: tripartite, inclusive or transformational (see [Table 4](#)).

## 5.1 Final Just Transition Framework for VSSs

Feedback from the stakeholder interviews and workshops helped us to revise the initial Draft Just Transition Framework of 12 principles and 53 core elements, resulting in a final **Just Transition Framework for VSSs**, comprising 9 principles and 50 core elements. Some of the original principles were maintained in the framework in response to stakeholder feedback. Overall, the total number of core elements has only decreased by one. However, the core elements themselves were substantially changed, with some being re-worded to emphasise key stakeholder priorities, some being separated out into multiple core elements, and others de-emphasised or combined.

The final **Just Transition Framework for VSSs** is summarised in Table 9 below, and the full set of principles and core elements are presented in [Annex 1](#).

### How to use this framework

This framework has been developed for VSSs. As just transition is context-specific and should be developed with relevant stakeholders, this framework is intended to be a reference point for consideration rather than a fixed minimum requirement that VSSs must incorporate into their standards. It provides a basis and reference for VSSs to support stakeholder dialogues and develop their own just transition requirements and approaches.

**Table 9: Summary of the Just Transition Framework for VSSs**

Category	Principles	Summary of related core elements
Rights and equity	Formal commitment to just transition principles and human rights standards	Commitment to just transition principles, human rights, labour rights and the ILO Decent Work Agenda, Indigenous rights, environmental protection and climate change mitigation
	Formal commitment to gender and social equity	Commitment to gender equity; social equity, diversity and inclusion; climate justice; inter-generational justice; creating/retaining value in value chains
Procedural justice	Ongoing social dialogue, inclusive governance and planning of transition activities	Alignment of existing policies with just transition principles; overarching just transition policy; internal capacity building, leadership, and alignment on just transition commitments; just transition agreements and social dialogue platforms with workers and unions, affected communities, and Indigenous peoples; early and ongoing social dialogue with government; participation in existing tripartite social dialogue platforms and cumulative impact assessment initiatives; early access to information throughout value chain
	Just transition plan(s) to mitigate the social impacts of transition activities	Public just transition engagement plan; tripartite social dialogue; ongoing stakeholder engagement; stakeholder consultation; FPIC for Indigenous peoples; inclusive design of just transition plan; robust due diligence, including human rights and cumulative impacts; inclusive just transition plan, with funding and partnerships plan and monitoring, reporting and verification system
Distributive justice	Decent work, skills development and health and safety for workers; social protection of workers and their families	Jobs and skills assessments; skills/(re)training programmes, in collaboration with governments, local providers, unions and communities; occupational health and safety, including mental health, with gender focus; zero tolerance of discrimination, prevention of harassment of workers; social protection and support packages for workers and their families
	Protection and support for affected communities and economies throughout the value chain	Community safety and security before, during and after transitions; collaboration on environmental health and protection and community development programmes, funds and partnerships; enterprise support programmes for businesses affected by transitions across the value chain; co-ownership and co-equity models for transition initiatives

Category	Principles	Summary of related core elements
Restorative justice	Reparations and restoration for affected people, including historical reparations	Formal recognition of past social, cultural and environmental harms and inequalities; reparations, rehabilitation and restoration for affected communities and marginalised people; community-led approaches with external support from government and others as appropriate
	Indigenous peoples' self-determination, partnerships and reparations	Formal recognition of Indigenous peoples' right to self-determination, territorial rights, past social, cultural/ environmental harms and inequalities, with reparations and restoration; due diligence on prior consultation and consent processes; co-ownership and co-equity transition models
	Environmental legacies and restoration	Address environmental legacies and ensure environmental clean-up before the start of new transition activities; Public financial commitment to post-transition environmental clean-up and restoration before the start of new transition activities; actively decarbonise and avoid offsetting; support decarbonisation throughout the value chain

## 5.2 General just transition implementation recommendations for VSSs

Recommendations were developed for VSSs seeking to incorporate just transition into their standards. These were based on the feedback from the interviewees and workshop participants, in particular the detailed responses of interviewees to questions on standard development, implementation and governance. The recommendations focus on meaningful stakeholder engagement and co-design of principles, requirements and metrics; supporting companies in effective implementation, while allowing flexibility to adapt to context and circumstances; and ensuring robust assurance.



### **Recommendation 1: Ensure transparent and inclusive governance mechanisms within the voluntary sustainability systems**

- Review existing governance arrangements to ensure adequate and balanced representation of key stakeholders in standard development and assurance processes.
- Ensure transparency around procedures and stakeholder relations.

As noted above, IRMA's governance framework was recognised by the Just Transition Finance Lab as being "uniquely aligned with the just transition principle of centring the voices of affected workers and communities". This underscores the importance of multi-stakeholder governance to VSSs, particularly in the development of just transition principles. Multistakeholder governance is essential for VSSs, as inclusive structures strengthen credibility and balanced decision-making by ensuring diverse stakeholder perspectives are represented. VSSs may wish to review their overall governance procedures in advance of developing a just transition standard, principle or requirements.

Some interviewees argued that strong governance, consistent accountability, and meaningful community consultation are ways to address local realities while also ensuring the standard requirements remain robust. Workshop participants and interviewees strongly recommended inclusive governance models for VSSs, with greater transparency, such as publication of meeting minutes and transparency about stakeholder relations. Stakeholder mapping can provide a basis for inclusive models.

Key just transition stakeholder groups for mining and steelmaking are: national and international worker organisations, trade unions and worker collectives; individual workers and their families and communities; transition-affected communities, Indigenous peoples and their designated representatives, historically marginalised communities and vulnerable groups; mining and steelmaking companies and value chain actors (buyers, producers, contractors, subcontractors, suppliers); national and local governments and regulators; shareholders, investors and donors; civil society organisations, research and advocacy groups, other regional and sector experts, consultants and VSS auditors.

Interviewees emphasised the importance of striking a balance between involving industry representatives (buyers and producers) in conversations to ensure that standards are practical and achievable, while also ensuring that corporate influence is not too strong, or perceived

as being too strong. Workshop participants also emphasised that Indigenous peoples need designated representation, distinct from engagement with other affected communities, while historically marginalised communities and vulnerable stakeholders also need special consideration.



### **Recommendation 2: Employ inclusive mechanisms to develop just transition requirements**

- Use the Just Transition Framework to guide the inclusive development of principles and requirements within the standard.
- Conduct contextual analysis and stakeholder mapping to ensure a comprehensive understanding of the local context, stakeholder needs, and practicalities.
- Apply transparent planning to build trust.
- Co-develop a shared definition and/or purpose of 'just transition' concept for the standard development process, drawing on the Framework's guidance.
- Through a targeted and inclusive approach, agree on appropriate principles, requirements, and terminology that ensure practicality and flexibility.
- Establish clear expectations and metrics appropriate to different contexts and requirements.

Interviewees and workshop participants emphasised that developing a just transition principle or standard needs to be an inclusive process, together with all relevant stakeholders. The process by which VSSs identify key stakeholders to take part in the process needs to be open, transparent and carefully considered. A stakeholder engagement plan will help to define and shape this process. Sharing this with stakeholders for review and comment is a good way to start the process.

VSSs need to work with stakeholders to develop credible and applicable definitions or interpretations of just transition and clear just transition objectives for the standard. These should be appropriate to the particular context (e.g., the sector, the specific transition action, the goals of the VSS). Terminology also needs to be discussed and agreed, with the avoidance of terminology that may confuse or alienate users and stakeholders.

VSSs and their stakeholders can use the 9 principles and 50 requirements developed through our mapping and stakeholder engagement process as the basis for discussions. Not all of the requirements need to be selected, and additional principles and requirements can be added through discussion with stakeholders. The discussion should also consider to what extent existing VSS requirements are adequate to ensure just transition outcomes, and to what extent additional or adapted requirements are needed in specific contexts.



### **Recommendation 3: Provide support for implementation and reporting**

- Employ co-development of detailed guidance to underpin principles and requirements, based on testing in the field and feedback from users and affected people.
- Provide practical support for VSS users, including clear guidance notes, tools, methodologies, training and benchmarking services, allowing flexibility for local adaptation.

Practical guidance for implementation and reporting should also be developed inclusively, based on field testing and feedback from users and the affected. VSSs need to provide clear guidance, tools, training and benchmarking services, especially about key challenging issues, such as the implementation of FPIC and grievance mechanisms. VSSs should provide a clear framework for how to assess, disclose, and mitigate risks, and provide assistance with impact risk assessment and disclosure methodologies. Additional support should be provided to help users understand the local context and map stakeholders, and adapt VSS requirements to local conditions. Additional support can also be provided for smaller enterprises and those who may be struggling as a result of the demands or effects of transitions. VSSs should also support companies in understanding and navigating the certification process, as required.



### **Recommendation 4: Require and enable robust assurance**

- Require a third-party independent verification process, ensuring auditors are trained in the requirements of just transitions, and are able to evaluate contextual specifics.
- Require public consultation and disclosure before and during the audit process, enabling stakeholders to raise issues and concerns about the process and results.

Stakeholders emphasised that the credibility and effective application of VSS principles and requirements depend on robust assurance processes, with external accountability and independent third-party verification. This is particularly important in relation to just transitions, where there is a strong emphasis on stakeholder engagement and human rights.

VSSs need to ensure they require high-quality auditors with appropriate skills and sensitivity, and experience in the given sectoral and geographical context. They need to ensure that the auditors are trained specifically in the requirements of just transitions and how to assess them objectively and adequately (considering local culture, practices and social systems, including consultation fatigue and general overwork of community representatives).

Audit processes should be inclusive, with public consultation and disclosure of audit plans before and during the audit process, including grievance procedures, to enable stakeholders to raise issues and concerns regarding the site and the audit process itself. Public disclosure of the results of the audit should allow adequate time for feedback and response.

Stakeholders strongly recommended better auditor training to ensure consistent, effective assessments. Interviewees stated that VSSs need to provide clear guidance, tools and training for auditors, especially about the application of FPIC and grievance mechanisms. VSSs should also make it clear that audit reports need to reflect the voices of local affected communities, workers and other stakeholders.



### **Recommendation 5: Model and encourage collaboration between VSSs, businesses and governments**

- Pursue recognition of other relevant standards, building synergies and shared goals.
- Collaboration initiatives should drive positive impacts through synergies and encouragement, rather than enabling the avoidance of commitment to more rigorous standards.
- Engage in collaboration between VSSs and governments on benchmarking policy, sharing audit reports, awareness raising and capacity building.
- Ensure sharing of knowledge and good practice with other organisations involved in just transition planning and implementation.

VSSs are not operating in isolation. Interviewees welcomed the fact that VSSs such as ResponsibleSteel and IRMA are recognising each other's standards and working together on shared goals. This enables synergy among multiple approaches, for example, enabling buyers to advise suppliers on which standard to follow. Stakeholders warned that collaboration initiatives should not be used as substitutes for, or to delay more substantive commitments, such as joining and complying with more rigorous standards, or to present a misleading impression of progress.

In addition to collaboration among VSSs, engagement between VSSs and governments represents an important form of collaboration. Examples may include awareness raising, knowledge sharing, and capacity building. Drawing on VSSs' practical experience with actual implementation across different sites and jurisdictions, these activities can shed light on challenges and opportunities, and help governments better understand how VSSs can complement public just transition policies.

VSSs can also benefit from sharing knowledge and good practice with other organisations involved in just transition planning and implementation, including those working on labour, regional development, and community engagement.

In addition, VSSs can play a critical role in supporting transitions. Through their system requirements, VSSs can encourage certified sites to engage with government social and economic development frameworks, align site-level actions with broader regional strategies, and actively support efforts to ensure equitable outcomes within regional economies in transition.

# 6. Conclusions



**Overall, this project has affirmed the critical importance of considering justice in transition processes and the pivotal role that standards can play in providing practical frameworks for implementation, accountability, and verification.**

This project set out to identify the role standards can play towards a socially responsible transition in heavy industries such as steel and mining, and to identify an agreed framework to take the findings forward. Jointly led by ResponsibleSteel and IRMA, the project has identified, through a new Just Transition Framework, how sector-specific standards can contribute to achieving just transitions in these industries. It has identified the different types of justice that can be considered, presented principles and potential elements that can be referenced when seeking to achieve a just transition, and made five best practice recommendations for VSSs.

The project also confirmed the complexity of achieving just transitions, observing that it involves multiple stakeholders across value chains and beyond, and that no single sector or actor can drive meaningful progress alone. A standard that sets requirements for businesses must recognise the realities of the industries it is operating in, and the significant influence local and sectoral context will play. Achieving a just transition requires sustained and inclusive engagement with all relevant stakeholders, and must take into account broader geopolitical, economic and social factors that influence both the transition processes and its outcomes.

The project also noted that there is a growing interest in the topic of just transition across the regulatory landscape, the mining and steel industries, workers, civil society, impacted communities, and other stakeholders. However, there remains considerable uncertainty about what implementation means in practice, and what is fair and realistic to expect from different stakeholders. Currently, existing VSSs appear to have different approaches to addressing the topic of just transition within their respective systems. Some standards have begun to include explicit references to just transition terminology, while many others have included some of the core principles and elements in this framework without explicitly using the terminology. However, these approaches should mature and become more aligned and unified over time.

Moving forward, VSSs may consider including just transition principles and terminology more explicitly in their standard and certification systems where feasible. Alternatively, where mandatory requirements are not feasible, guidance may be developed as a best practice reference. Given the different implications of a just transition within the mining and steel sectors, and yet their interdependency in the value chain, VSSs should continue collaborating and hosting multi-stakeholder dialogues to further develop complementary approaches to integrating these considerations into their standard and assurance systems at the right level and the right time.

This continues to be a rapidly evolving space. ResponsibleSteel and IRMA welcome feedback on the Just Transition Framework and the recommendations of this report.

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# Annex 1: Just Transition Framework for VSSs: Full set of principles and core elements

Principles		Core elements
RIGHTS AND EQUITY	<b>1. Formal commitment to just transition principles and human rights standards</b>	1.1 <b>Commitment to just transition principles</b> in alignment with the ILO Guidelines for a Just Transition, the Paris Agreement and the UN Working Group on Human Rights Recommendations for Businesses.
		1.2 <b>Commitment to respect human rights</b> in alignment with the UN Guiding Principles on Business and Human Rights and other instruments (e.g., Voluntary Principles on Security and Human Rights). Human rights include labour rights (Core element 1.3), Indigenous rights (Core element 1.4), child rights, and rights to livelihoods, a clean environment, and access to energy and water.
		1.3 <b>Commitment to the ILO Decent Work Agenda and fundamental principles and rights at work</b> , in alignment with international labour rights standards (e.g., ILO conventions).
		1.4 <b>Commitment to respect Indigenous rights</b> in alignment with international Indigenous rights principles (e.g., ILO Convention 169, UN Declaration on the Rights of Indigenous Peoples).
		1.5 <b>Commitment to environmental protection and climate change mitigation</b> in alignment with the Paris Agreement, Sustainable Development Goals, and OECD due diligence guidance.
	<b>2. Formal commitment to gender and social equity</b>	2.1 <b>Commitment to gender equity</b> in terms of employment opportunities, working conditions, and safety at work (e.g., gender-based violence and harassment), mitigating transition impacts and ensuring community-level gender safeguards and equitable access to transition benefits.
		2.2 <b>Commitment to social equity, diversity and inclusion</b> , through inclusive decision-making, balancing power relations, non-discrimination, empowerment of vulnerable groups, recognition of diverse knowledge systems and cultures, recognition of the need for equitable access to the benefits of transition and the need for global equity in transitions.
		2.3 <b>Commitment to climate justice and inter-generational justice</b> , including a commitment to address historical injustices that are embedded within transitions, especially in relation to Indigenous and local communities.
		2.4 <b>Commitment to creating and retaining value in value chains</b> , through responsible sourcing, resource efficiency, recycling and consumption reduction, and participation in producer responsibility initiatives, ensuring that these efforts increase opportunities for workers and communities and do not negatively impact on them. Commitment to ongoing meaningful engagement with value chain actors and communities.

Principles	Core elements
<b>PROCEDURAL JUSTICE</b>  <b>3. Ongoing social dialogue, inclusive governance and planning of transition activities</b>	<p>3.1 <b>Review and alignment of existing policies with just transition principles</b>, including: 1) Human rights due diligence; 2) Labour policy and collective bargaining agreement; 3) Occupational health and safety including mental health provisions; 4) Diversity, equity and inclusion policy, or equivalent; 5) Stakeholder and community engagement policy; 6) Decommissioning/smart closure policies; 7) Human resources, hiring and retrenchment policies; 8) Responsible sourcing policy; 9) Procurement policy; and others.</p>
	<p>3.2 <b>Overarching just transition policy</b>, embedded in existing human rights due diligence policy, with a commitment to ongoing social dialogue, information disclosure and inclusive decision-making; to ensure adequate funding for just transitions; and to build internal and external capacities for ongoing and discrete just transition activities.</p>
	<p>3.3 <b>Internal alignment on just transition commitments, and avoidance of lobbying</b> on issues that undermine just transition commitments and policies.</p>
	<p>3.4 <b>Skills development, capacity building and leadership</b> within the company (VSS client) to ensure preparedness for just transition activities (e.g., recruitment of social experts and leaders committed to just transition principles, training for wider personnel in just transition principles and commitments).</p>
	<p>3.5 <b>Mapping of transition stakeholders</b> throughout the value chain, including workers, communities and value-chain actors, through an inclusive stakeholder mapping exercise, identifying their long-term information and engagement needs.</p>
	<p>3.6 <b>Just transition agreement with workers and unions</b>, establishing a social dialogue platform for information sharing, collective decision-making and responding to issues and grievances. This could be integrated within an existing collective bargaining agreement, or otherwise embedded into existing business processes.</p>
	<p>3.7 <b>Just transition agreement(s) with local affected communities</b>, establishing a social dialogue platform for information sharing, collective decision-making and responding to issues and grievances. This could be integrated into wider community relationships protocols (or similar) and be linked to existing grievance mechanisms.</p>
	<p>3.8 <b>Just transition agreement(s) with Indigenous communities</b>, establishing a social dialogue platform, which reflects the specific cultural, social and territorial realities of Indigenous communities, to enable information sharing, collective decision-making and responding to issues and grievances. This could be integrated into wider Indigenous Relationship Protocols (or similar) and be linked to existing grievance mechanisms.</p>
	<p>3.9 <b>Early and ongoing social dialogue</b> with government agencies to build trust, ensure alignment across policies and planning, and prepare for specific just transition activities. Key transition issues to cover may include status updates (e.g., imminent transitions); transition timing (ensuring they are not hurried); transition planning and information sharing; strategic environmental assessment and cumulative impact analysis; economic forecasting; Indigenous rights and FPIC implementation; community engagement and education; workforce training and skills development; and social safeguards and safety nets.</p>
	<p>3.10 <b>Proactive participation in strategic assessment and cumulative impact initiatives</b>, to build dialogue with other developers and government agencies, so as to fully understand cumulative impacts, including environmental impacts (e.g., of multiple projects in the same area) and workforce issues (e.g., skills assessments).</p>
	<p>3.11 <b>Early access to information, awareness raising and education throughout the value chain</b>, to ensure advance awareness and informed participation of stakeholders in transition-related decision-making, including community education initiatives, education on new technologies, publication of plans, decisions and meeting minutes, and regular reporting on just transition activities. Avoid greenwashing and misinformation.</p>
	<p>3.12 <b>Share knowledge and good practice</b> with other organisations involved in planning and implementing just transitions, with a view to learning and improving practices both internally and externally (e.g., country, local area and sector-wide).</p>

Principles		Core elements
PROCEDURAL JUSTICE	4. Just transition plan(s) to mitigate the social impacts of transition activities	4.1 <b>Just transition engagement plan</b> to ensure inclusive and transparent planning and decision making, with workers, trade unions, affected communities, suppliers and civil society, based on updated Just Transition Stakeholder Map.
		4.2 <b>Tripartite social dialogue</b> , with unions, governments and the company prior to the start of any transition activities, based on existing just transition agreements and social dialogue platforms (Core elements 3.4 and 3.6).
		4.3 <b>Social dialogue with stakeholders</b> , involving meaningful consultation and inclusive decision-making with affected people, especially workers, value-chain actors, communities, Indigenous peoples and vulnerable groups, based on existing just transition agreements and social dialogue platforms (Core elements 3.4-5).
		4.4 <b>Process of inclusive design of just transition plan(s)</b> together with workers, communities, value-chain actors and other stakeholders, based on existing just transition agreements and social dialogue platforms. Plan should be appropriate to the local context, co-planned and driven by local stakeholders, with the aim of preparing for, anticipating, and modelling the effects of transition activities.
		4.5 <b>Robust due diligence of transition impacts and benefits</b> , ensuring inclusive assessment of transition risks, impacts and opportunities throughout the value chain and involving affected people. This includes: 1) human rights due diligence in line with international standards; 2) environmental and social due diligence in line with OECD due diligence guidelines; 3) occupational health and safety risk assessment, including mental health; 4) cumulative impacts assessment; 5) ongoing engagement with governments and other stakeholders on relevant strategic environmental, social and economic assessments.
		4.6 <b>Modelling of potential impacts</b> , in collaboration with relevant government departments and modelling experts, taking into account the results of due diligence and stakeholder engagement.
		4.7 <b>Just transition plan</b> , co-developed with stakeholders, to include: 1) Analysis of stakeholder engagement, due diligence and modelling, with identification of expected risks, impacts, needs and opportunities; 2) Agreed actions to mitigate environmental, social, cultural and human rights risks and impacts, meet stakeholder needs, and enhance opportunities; 3) Worker retention, reskilling, and social support; 4) Community safeguarding, socio-economic development and support; 5) Community and Indigenous peoples' reparations and restoration; 6) Environmental protection and restoration.
		4.8 <b>Just transition funding and partnerships plan</b> , clearly outlining financing mechanisms, funding partnerships and collaboration to ensure adequate ongoing support for just transition activities, technical support and social safety nets. May include collaboration with government departments, investors, Indigenous and local community bodies, and civil society organisations.
		4.9 <b>Just transition monitoring, reporting and verification system</b> , with clear implementation pathways and measurable outcomes for the transition plan; operational-level data disclosure; monitoring over time, including participatory monitoring by workers and communities; and publication of the results of monitoring and audits.

Principles		Core elements
DISTRIBUTIVE JUSTICE	5. Decent work, skills development, health and safety for workers; social protection of workers and their families	5.1 <b>Jobs and skills assessments</b> , in collaboration with unions, governments and communities, including assessment of expected job losses, new job potential and opportunities, and identification of gaps and needs, as a basis for targeted training programmes that prepare workers for the future.
		5.2 <b>Targeted training programmes</b> that prepare workers for the future, based on jobs and skills assessments. Provide support for strengthening skills, career development and social mobility, through gender-inclusive training and education, including lifelong learning skills, basic academic skills, skills in new sectors, within-company retraining and work experience, and incentives for retraining and relocation where needed.
		5.3 <b>Collaboration on skills and retraining programmes</b> to ensure alignment with local needs and expected opportunities, including public-private partnerships, partnerships with universities and vocational training providers, and collaboration with unions and communities.
		5.4 <b>Occupational health and safety, including mental health</b> . Ensure that transition planning takes into account new and different health and safety requirements, and ensures adequate training and systems are put in place. Mental health monitoring and support for workers before, during and after transitions.
		5.5 <b>Zero tolerance of discrimination, harassment, bullying, and violence</b> . Ensure clear procedures to tackle, discrimination, bullying and gender-based violence and harassment (GBVH), especially during transition periods which may exacerbate these. No harassment or intimidation of workers to agree to transition activities and poor or unsafe working conditions. Grievance procedures to accommodate and promote these values, including safe spaces and anonymous channels for complaint.
		5.6. <b>Social protection and support packages for workers</b> before, during and after transitions, including support for retraining, relocation, jobs in new sectors, job-to-job transitions, and support for dependent families.
	6. Protection and support for affected communities and economies throughout the value chain	6.1 <b>Ensure the safety and security of local communities before, during and after transitions</b> , including protection of human rights defenders and zero tolerance for discrimination, violence, retaliation, gender-based violence and harassment (GBVH) against community members, with particular attention to the marginalised and vulnerable. No coercion of community members to agree to transition activities. Grievance procedures to accommodate and promote these values, including safe spaces and anonymous channels for complaint.
		6.2 <b>Collaboration with communities on environmental health and protection programmes</b> to ensure access to clean air and water, food and livelihoods, and protection of land, biodiversity and ecosystem services, including participatory monitoring and cumulative impact analysis, throughout the value chain. Alignment with government and other programmes to optimise environmental benefits.
		6.3 <b>Community development programmes, funds and partnerships</b> to ensure socio-economic support for regions affected by transition activities, and equitable sharing of the benefits of transitions. Collaboration with governments and local stakeholders to promote economic diversification and address existing economic and social inequalities, including poverty, throughout the value chain. Special attention to support for marginalised and vulnerable groups.
		6.4 <b>Enterprise support programmes for businesses affected by transitions throughout the value chain</b> . Ensure support for local businesses and suppliers negatively affected by transitions and create local supply chain opportunities.
6.5 <b>Co-ownership and co-equity models for transition initiatives</b> to ensure equitable access to the benefits of transitions, including community access to energy and other low-carbon goods and services.		

Principles		Core elements
RESTORATIVE JUSTICE	<b>7. Reparations and restoration for affected people</b>	7.1 <b>Formal recognition of past social, cultural and environmental harms and inequalities</b> , such as loss of livelihoods, environmental destruction, and disparities in access to benefits, for affected communities and marginalised people, and recognition of the need to preserve their way of life, respecting their rights, culture and language.
		7.2 <b>Reparations, rehabilitation and restoration for affected communities and marginalised people</b> in respect of past social and cultural harms, inequalities and environmental damage. Support for community-led approaches, respecting their rights, culture and language, and ensuring preservation of their way of life. Collaboration with government agencies and other external actors.
	<b>8. Indigenous peoples' self-determination, partnerships and reparations</b>	8.1 <b>Formal recognition of Indigenous peoples' right to self-determination, territorial rights, and past social, cultural and environmental harms and inequalities</b> . Recognition of their right as Indigenous peoples to participate in decisions affecting their own rights and lives. Recognition as rights holders and not only stakeholders in transition activities. Recognition of the need to preserve their way of life, respecting their rights, culture and language. This could align with a formal reconciliation action plan or similar recognition document.
		8.2 <b>Due diligence on prior consultation and consent processes</b> . Determine whether the host government conducted adequate consultation aimed at obtaining Indigenous peoples' consent prior to granting permission for transition activities, with a plan to make up for any gaps in government actions. In case of acquisitions or activities on land with prior use, include prior asset and land owners in due diligence.
		8.3 <b>Reparations, rehabilitation and restoration for Indigenous peoples</b> in respect of past social and cultural harms, inequalities and environmental damage. Support for Indigenous-led partnership approaches, respecting their rights, culture and language, and ensuring preservation of their way of life. Collaboration with government agencies and other external actors as appropriate.
		8.4 <b>Co-ownership and co-equity models for transition initiatives with Indigenous peoples</b> to acknowledge and respect their right to self-determination and historical relationship to the territory, and to ensure equitable access to the benefits of transitions.
	<b>9. Environmental legacies and restoration</b>	9.1 <b>Address environmental legacies and ensure environmental clean-up before the start of new transition activities</b> . Prior consultation and collaboration with local communities and government.
		9.2 <b>Public financial commitment to post-transition environmental clean-up and restoration</b> before the start of new transition activities.
		9.3 <b>Actively decarbonise and avoid offsetting where feasible</b> , decreasing offsetting over time. Support decarbonisation throughout value chains, in collaboration with value chain actors and communities.



[info@responsiblesteel.org](mailto:info@responsiblesteel.org)

[info@responsiblemining.net](mailto:info@responsiblemining.net)