

Call: HORIZON-CL2-2023-TRANSFORMATIONS-01
Funding Scheme: Research and Innovation Action (RIA)
HORIZON-CL2-2023-TRANSFORMATIONS-01-10



Deliverable No. 4.1

Policy Briefs: Policy recommendations for advancing a just transition in the current policy

Grant Agreement no.:	101132562
Project Title:	Just transition to a green and digital future for all
Contractual Submission Date:	28/02/2026
Actual Submission Date:	27/02/2026
Responsible partner:	VTT Technical Research Centre of Finland (VTT)



Funded by
the European Union

Grant agreement no.	101132562
Project full title	READJUST – Just transition to a green and digital future for all

Deliverable number	D4.1
Deliverable title	Policy Briefs: Policy recommendations for advancing a just transition in the current policy
Type ¹	R
Dissemination level ²	PU
Work package number	WP4
Author(s)	Nina Rilla (VTT), Anna Traylor (EIT Food), Jehan Bhikoo (EIT Urban Mobility), Anu Tuominen (VTT)
READJUST reviewers	Stephanie Daimer (Fraunhofer)
Keywords	Policy process; SUMP; local decision-making

Funded by the European Union. Views and opinions expressed are, however, those of the author(s) only and do not necessarily reflect those of the European Union or the European Research Executive Agency (REA).

Neither the European Union nor the granting authority can be held responsible for them.

¹ **Type:** Use one of the following codes (in consistence with the Description of the Action):

- R: Document, report (excluding the periodic and final reports)
- DEM: Demonstrator, pilot, prototype, plan designs
- DEC: Websites, patents filing, press & media actions, videos, etc.

² **Dissemination level:** Use one of the following codes (in consistence with the Description of the Action)

- PU: Public, fully open, e.g. web
- SEN: Sensitive, limited under conditions of the Grant Agreement

Table of Contents

Executive Summary..... 4

1 Introduction 4

2 Just twin transition in the mobility sector 6

 2.1 Sustainable Urban Mobility 6

 2.2 Sustainable urban mobility in Helsinki 8

 2.2.1 Identified policy processes 10

 2.2.2 Observed challenges in the policy processes 10

 2.2.3 Key stakeholders in the Helsinki case 11

 2.3 Sustainable urban mobility in Vitoria-Gasteiz, Spain..... 12

 2.3.1 Identified policy process 14

 2.3.2 Observed challenges in the policy processes 15

 2.3.3 Key stakeholders in the Vitoria-Gasteiz case 15

3 Just twin transition in the agrifood sector..... 16

 3.1 Regenerative agriculture..... 16

 3.1.1 Observed bottlenecks in the policy process from previous studies or experience . 17

 3.2 Regenerative Agriculture in Poland 17

 3.2.1 Identified policy process in Poland..... 18

 3.2.2 Key stakeholders in Polish agrifood 18

 3.3 Regenerative Agriculture in Ibiza, Spain 19

 3.3.1 Identified policy process in the Spanish agrifood 21

 3.3.2 Key stakeholders in the Spanish agrifood case 21

4 Next steps..... 22

 4.1 Timeline and data collection plan 22

 4.2 The conceptual approach 23

5 References 25

Executive Summary

This report introduces policy processes shaping a just transition to a green and digital future across mobility and agrifood sectors. The study to be performed in 2026 will focus on identifying policy process bottlenecks and enabling factors at national, regional, and municipal levels that influence the integration of sustainability, digitalisation, and justice considerations in ongoing transitions.

The analysis will focus on four empirical case contexts. In the mobility sector, Sustainable Urban Mobility Plan (SUMP) processes are examined in Helsinki (Finland) and Vitoria-Gasteiz (Spain). In the agrifood sector, the implementation of the EU Soil Monitoring Law is explored at the national level in Poland and at the regional level in Ibiza (Spain), with a focus on regenerative agriculture. Rather than assessing policy outcomes, the study concentrates on policy design and coordination processes, recognising their central role in shaping just transition pathways. The study introduces a conceptual framework based on justice dimensions and policy intervention points to guide subsequent empirical work.

1 Introduction

Task 4.1 aims to understand **policy change towards a just transition to a green and digital future** for all by exploring policy processes at multiple levels of governance. We identify key EU-level policies in the mobility and agrifood case areas and track bottlenecks in the current policy process at the national and local levels. We integrate a multi-stakeholder view to inquire what the hindering and supportive factors are at the national, regional and city level policy making to advance a just twin transition.

This report introduces policy processes in four case contexts and suggests a plan for successful data collection for formulating policy recommendations in 2026-2027. To address the just twin transition in mobility, we focus on **Sustainable Urban Mobility Plan (SUMP)** strategy processes in Helsinki, Finland, and Vitoria-Gasteiz, Spain, while agrifood cases take a regenerative agriculture perspective and explore the adoption of **the EU Soil Monitoring Law** in Poland and in Ibiza, Spain (Figure 1).

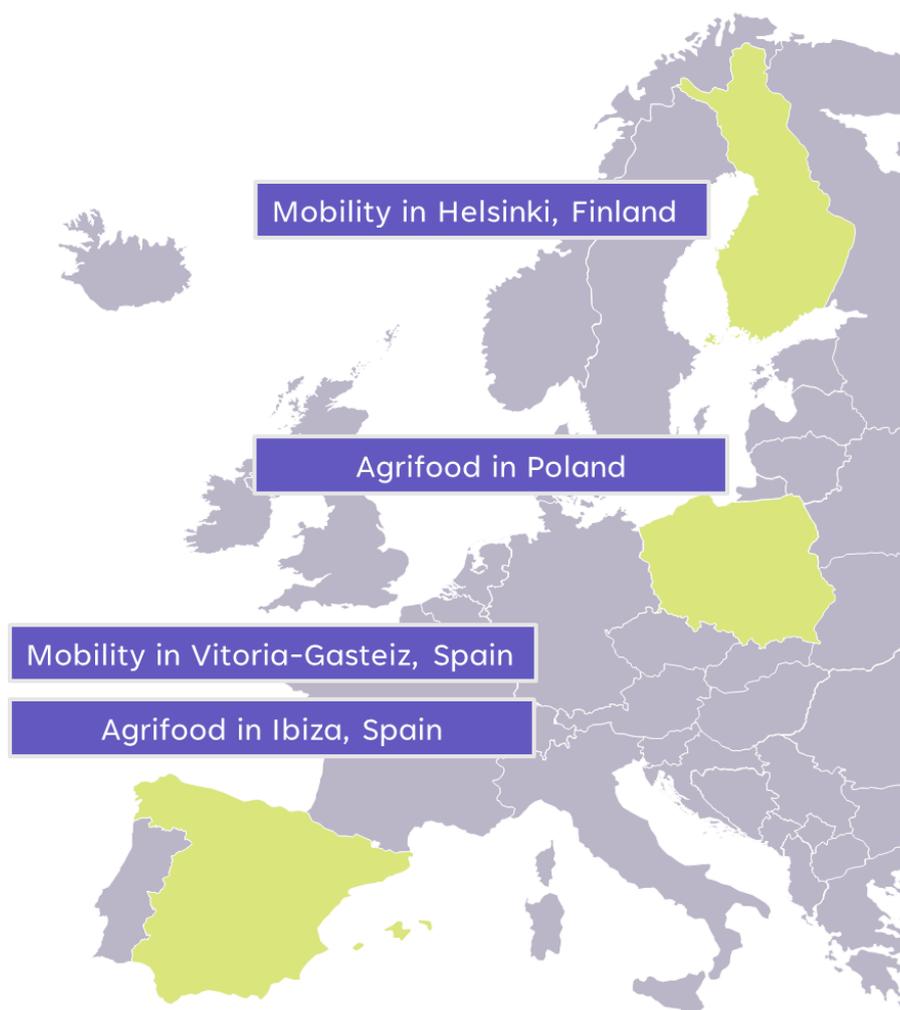


Figure 1. Cases to identify twin transition policy process bottlenecks

The aim is to explore regional (city or municipality) and national-level policy processes to pinpoint practical bottlenecks encountered by those actors, civil servants and specialists, implementing EU-level directives and regulations. We believe this supplements the case study of WP3, which has a regional focus and offers a view of more practice-oriented local processes compared to the EU-level helicopter view.

Thus, we will not have a strong focus on EU-level processes in this analysis but build on existing work which analyses the current state and shortcomings of EU-level policy processes regarding the just twin transitions³. The main diagnosis for the EU-level is that an integrated policy approach to twin transitions does not yet exist. We see green and digital policy agendas, which are increasingly opening up towards a more integrated perspective. So, the challenge for policy processes is at the moment twofold: they need to take a more integrated approach for a twin

³ Schwäbe, C.; Daimer, S.; Krauter, T.; Zenker, A. (2026, forthcoming): Governing the interrelation of digital and sustainable innovation - The role of the EU in integrating the twin transitions. On behalf of the German Environment Agency. Dessau-Roßlau.

transition perspective, and they need to open up towards the justice perspective, which in fact means to address a “triple transition” perspective. As a recent study⁴ argue, it is only the integrated twin transition perspective, which opens up a broad perspective on inequalities, as many inequalities appear at the intersection of the two transition logics or are exacerbated by it. At the same time, the twin transition can help to mitigate some inequalities, so there is synergetic potential, which needs to be realised. Also, in READJUST, we have explored exactly these assumptions of inequalities arising at the intersection of the two transitions and being mitigated by it⁵.

Both the SUMP in mobility and the EU Soil Monitoring Law in agrifood are green policy agendas that aim to connect to digital transition aspects. They will give context to address potential bottlenecks in advancing the just twin transition in the same two ways as outlined in the previous paragraph: We aim to explore (practical) challenges in combining digital and green transition approaches in policy processes, and how equality and justice are addressed in these processes. We hope to learn about tensions that civil servants face in advancing the just twin transition in mobility and agrifood contexts. The tensions are informative for formulating policy recommendations in the project.

The Readjust project applies the following definition: “The term ‘twin transition’ refers to the simultaneous green and digital transition processes by uniting green and digital transitions to form ‘twin transitions’. Both transition processes have the potential to accelerate each other.” (Muench et al., 2022, p. 7⁶)

In section 2, this report introduces twin transition processes that we study in the mobility sector in Helsinki and Vitoria-Gasteiz. In contrast, Section 3 introduces agrifood-related twin transition processes in Poland and Ibiza. In these sections, we also touch upon potential challenges in policy processes based on bottom-up empirical observations, which have been raised in background discussions or in previous studies. The last section introduces our conceptual approach and timeline for data collection.

2 Just twin transition in the mobility sector

2.1 Sustainable Urban Mobility

In the READJUST project, a just twin transition of mobility is approached from a sustainable urban mobility plan (SUMP) perspective – a strategy process that was identified as an important and topical process advancing twin transition in the case studies of Helsinki Region, Finland and

⁴ *ibid*

⁵ Stadler et al. (2025). Report on synergies and commonalities in policies, strategies and programmes related to twin transitions in EU policies. Deliverable 1.1 of the Readjust project.

⁶ Muench, S., Stoermer, E., Jensen, K., Asikainen, T., Salvi, M. & Scapolo, F. (2022). Towards a green and digital future, Publications Office of the European Union, Luxembourg, <https://data.europa.eu/doi/10.2760/977331>, JRC129319.

the city of Vitoria-Gasteiz, Spain. A reason why SUMP is topical is that cities are currently designing the plans that must be reported to the Commission in 2027.

Given that cities are currently implementing this policy design process, studying SUMP development provides important contextual understanding for the WP3 case studies, which are selected with the responsible stakeholders and focus on the powertrain transition of logistics to lower CO2 emissions.

“A sustainable urban mobility plan (SUMP) is a strategic plan designed to satisfy the mobility needs of people and businesses in cities and their surroundings for a better quality of life. It builds on existing planning practices and takes due consideration of integration, participation, and evaluation principles.”⁷

SUMP promotes balanced development that takes all modes of transport into account and guides and encourages the transition towards more sustainable modes. The history of SUMP dates to 2013, when the Commission presented a concept for sustainable urban mobility planning as part of the Urban Mobility Package. This was well received across Europe, prompting cities and towns to prepare or update their urban mobility plans. For example, Vitoria-Gasteiz has been one of the early adopters in developing sustainable mobility since 2006.

In addition to SUMP, the EU has also guidelines for sustainable urban logistics (SULP = Sustainable Urban Logistics Plan), however, in many cities, like in Finland, logistics’ aspects are integrated as part of the urban mobility plan.

The latest push from the European Commission to advance sustainable urban mobility planning was in 2025, as, due to the TENT-T regulation, Member States had to designate a SUMP contact point and establish a national SUMP programme with the aim of supporting the urban nodes to adopt and implement the SUMPs. Both Helsinki Region and Vitoria-Gasteiz are Urban nodes⁸. The TEN-T Regulation aims, among other things, to achieve more environmentally friendly transport and a more sustainable modal mix, as well as to reduce congestion, greenhouse gas emissions and other negative externalities of the transport system. Figure 2 introduces the main EU-level policies for implementing SUMP.

⁷ https://transport.ec.europa.eu/transport-themes/urban-transport/sustainable-urban-mobility-planning-and-monitoring_en (Accessed 22.1.2026)

⁸ [Regulation \(EU\) 2024/1679 of the European Parliament and of the Council of 13 June 2024 on Union guidelines for the development of the trans-European transport network, amending Regulations \(EU\) 2021/1153 and \(EU\) No 913/2010 and repealing Regulation \(EU\) No 1315/2013Text with EEA relevance.](#) (accessed 24.2.2026)



Figure 2. Key EU decisions related to the progress of adopting the SUMP

The European Commission has extensive guidelines⁹ for the SUMP, one of its central elements is rolling planning ensured by monitoring, self-assessment and open, future-oriented interaction. As the rolling planning extends over political terms, for example, in the city councils, it aims to tackle the challenge of the short-sightedness of the strategy.

2.2 Sustainable urban mobility in Helsinki

Sustainable urban mobility has long been promoted in Finnish cities of different sizes. In urban regions, transport system plans have been prepared, one of whose objectives is the sustainability of the transport system. In addition, various other plans related to sustainable and smart mobility and traffic safety, as well as, for example, accessibility and climate strategies, address many of the themes included in sustainable urban mobility. In some cities, comprehensive SUMP plans have also been prepared. In Finland, the requirements of the TEN-T Regulation are focused on the manner in which transport system planning is performed rather than on the content, given that sustainability has been one of the core focuses of mobility planning for a long time.

⁹ https://urban-mobility-observatory.transport.ec.europa.eu/sustainable-urban-mobility-plans/sump-guidelines-and-decision-makers-summary_en (accessed 30.1.2026)

Helsinki



Region: Uusimaa

Sub-region: Helsinki sub-region

Metropolitan area: Helsinki metropolitan area

Governing body: City Council of Helsinki

Population in 2025: 689,758 (Capital city); 1,360,075 (Urban); 1,616,656 (metro)

Part of the EU Mission on Climate-Neutral and Smart Cities: Yes

Table 1. Fact sheet of the Helsinki region, Finland

In Helsinki, the sustainable urban mobility planning is integrated as part of the Helsinki region transport system plan (HLJ) that covers the fifteen municipalities of Greater Helsinki (Table 1). Although many of the municipalities, including the city of Helsinki, have their own sustainable mobility plans to promote sustainable transport modes, at the regional level, the starting point is that the demands of the SUMP are integrated into the regional transport system plan. Helsinki Region Transport - HSL is a joint municipal authority responsible for the public transport system in the Helsinki region and for SUMP development. Figure 3 illustrates the SUMP implementation in Helsinki.

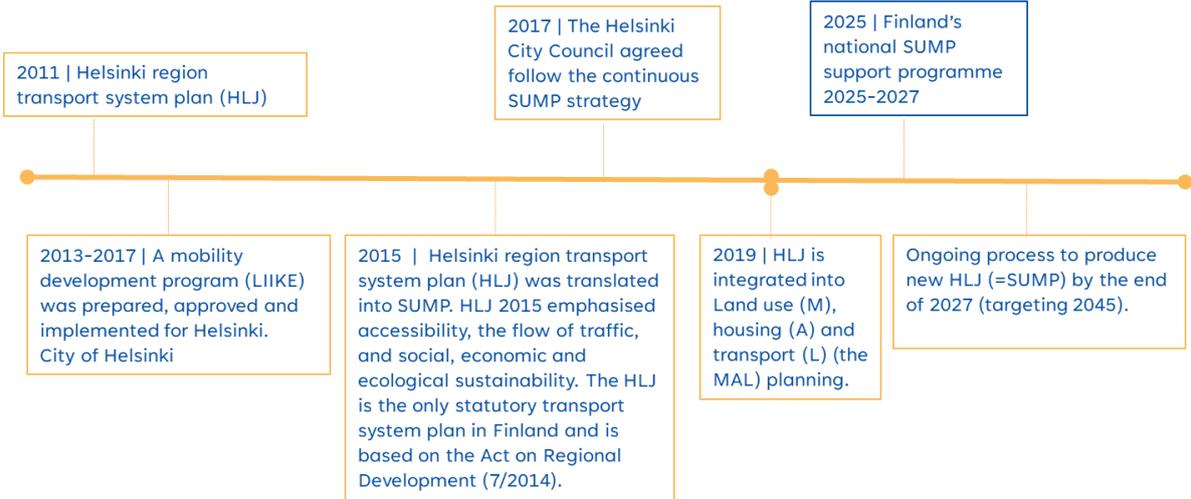


Figure 3. Selected decisions on the implementation of SUMP in Helsinki

In 2019, SUMP/HLJ was integrated into Land use (M), housing (A) and transport (L) agreement (the MAL) of the Helsinki Region. MAL is a long-term agreement, which is updated every 4 years.

MAL agreement defines the shared objectives of the state and the urban regions, as well as concrete measures for housing production in the coming years and for the development of a sustainable urban structure and transport system. The agreements are concluded between the State of Finland and the seven largest urban regions: Helsinki, Turku, Tampere, Oulu, Jyväskylä, Kuopio and Lahti. Next update is in 2027, and the responsible ministries for the work are the Ministry of Environment and the Ministry of Transport.

In Finland, it is relevant to integrate regional SUMP planning in accordance with the TEN-T Regulation into the existing planning system. Accordingly, the MAL agreements stipulate that regional transport system plans will henceforth be prepared in compliance with the TEN-T Regulation by the end of 2027.

Regarding digitalisation in mobility's twin transition, Finland adopted 1.1.2026 an Act on Digital Information Services in the Transport System (laki liikennejärjestelmän digitaalisista tietopalveluista - 'Liikenteen data-avaruus II'). The act will integrate digitalisation more firmly into sustainable mobility and was formulated in collaboration with the Ministry of Transport and Communications and the Ministry of Environment. The act is based on Directive (EU) 2023/2661 of the European Parliament and of the Council of 22 November 2023 amending Directive 2010/40/EU on the framework for the deployment of Intelligent Transport Systems in the field of road transport and for interfaces with other modes of transport.

2.2.1 Identified policy processes

The policy process focus will be on the one hand, the SUMP process and, on the other hand, how the new Act on Digital Information Services in the Transport System is interwoven into the SUMP decision-making in the Helsinki region. Simultaneous focus on two policy processes is hoped to reveal challenges of the twin transition, given that digitalisation and sustainability are still largely discussed and treated separately in the policies¹⁰.

2.2.2 Observed challenges in the policy processes

In the Finnish context, integration of different objectives and decision-making processes, i.e. combining a holistic approach of the strategic development of the region (SUMP) with local transport planning, has, according to a study ordered by Traficom¹¹, been identified as one of the main challenges to meet the TEN-T requirements. For example, the process should better integrate iterative elements between vision, objectives, actions and impact assessment, and co-creative practices should also be better aligned with the process. To succeed, good collaboration not only between city region and state government is needed but the study also noted that planning processes must promote more extensive, diverse and effective interaction with civil servants and experts involved in the planning processes, as well as with other stakeholders. Wide stakeholder engagement and good internal communication between different agencies are

¹⁰ Stadler et al. (2025). Report on synergies and commonalities in policies, strategies and programmes related to twin transitions in EU policies. Deliverable 1.1 of the Readjust project.

¹¹ Traficom (2024). https://traficom.fi/sites/default/files/media/publication/KaupsuSUMP_raportti.pdf (In Finnish, accessed 30.1.2026)

important for the acceptability, effectiveness and commitment of the planning; however, engagement demands time and resources that are not always sufficiently available.

In addition to the potential bottlenecks in the contents of the strategy and planning processes, the topic of sustainable mobility is, according to background discussions at the Helsinki case-related workshop on 29.1.2026, a politically sensitive topic and may create hindrances in politically influenced processes. The political disputes may create unwanted spillover effects in city-level development, even though collaboration between specialists is well-functioning and effective. The closeness of the parliamentary elections in April 2027 brings extra political tensions in topics that are traditionally politically sensitive, like mobility and climate change. In addition, short political terms (4 years) may negatively affect the long-term (20 years or more) mobility strategies, making the ambition level of the objectives low and civil servants less committed.

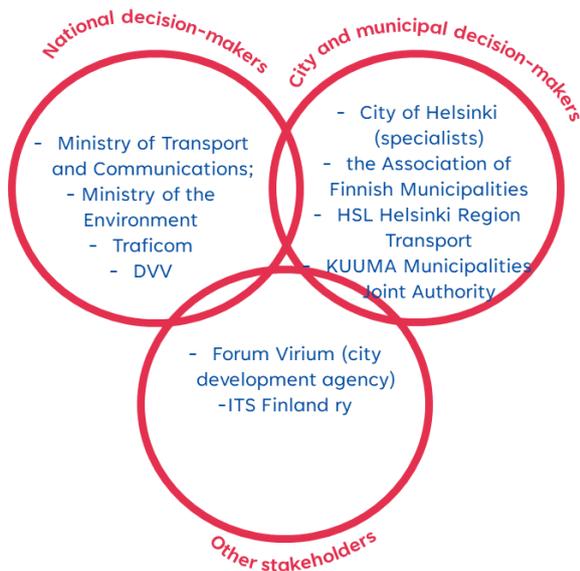
Given that SUMP must be coordinated with the transport system plan and the land use plan (MAL), it becomes a complex and laborious process that is expected to create barriers, as this integration process is still ongoing in Helsinki.

The round of comments for the Act on Digital Information Services in the Transport System in 2025 revealed that, for example, municipalities fear that the proposed obligations bring high costs to municipalities, and were concerned that preparation time is insufficient, as national operating methods and technical specifications are not available before the entry into force of the Act (1.1.2026). Mobility service providers were concerned about data ownership and how the availability and quality of accessibility information, which is crucial for people who have restrictions on their ability to use mobility services. In the current state, challenges were found to be related to the development of accessibility information. In general, it was stressed that ITS development should support all mobility forms equally and stress sustainability, accessibility and safety of the transport system.

2.2.3 Key stakeholders in the Helsinki case

The Finnish Transport and Communications Agency - Traficom acts as the national contact point for SUMPS in Finland, as required by the EU and supports urban regions in the preparation and implementation of their plans. Traficom is one of the agencies under the administrative sector of **the Ministry of Transport and Communication** and has a mandate to ensure that transport and communications networks and services in Finland run smoothly, safely and sustainably. In addition to the Ministry of Transport and Communication, **the Ministry of Environment** is a core actor in the sustainability-related decision-making (Figure 4). Both ministries also play an important role in the Act on Digital Information Services in the Transport System. Furthermore, **Digital and Population Data Services Agency** is an important national-level player, especially in actions related to digitalisation.

As the topic of the Helsinki region case study is the powertrain transition of logistics, the small



and large logistics companies are the key stakeholders of the case. At the local, city and municipal level, key stakeholders are actors who develop and implement the SUMP process. Key informants are different specialists in **the City of Helsinki**, and in the other three cities in the Helsinki Metropolitan Area: Espoo, Vantaa and Kauniainen, for example, their transport and urban planning. Given the wider scope of SUMP, **the Association of Finnish Municipalities** and **KUUMA Municipalities Joint Authority** offer perspectives on cross-municipality policy processes and potential bottlenecks associated with MAL planning. The central actor is **Helsinki Region Transport**, as the main architect of SUMP.

Figure 4. Key stakeholders in the SUMP process – case Helsinki

Forum Virium, the Helsinki city development agency, is involved in advancing twin transition in Helsinki and **ITS Finland ry (registered association)** acts in an advisory role in many twin transition strategic processes and has a view on city and regional decision-making. The Intelligent Transport Network – ITS Finland ry is a cooperation forum that promotes digitalisation in the transport sector. Also, universities and research institutes carrying out research on logistics are relevant stakeholders of the case study.

2.3 Sustainable urban mobility in Vitoria-Gasteiz, Spain

In Spain, sustainable urban mobility planning is embedded within a multi-level governance framework influenced by European Union policy guidance, national legislation, and local implementation practices. Since the introduction of the **Sustainable Urban Mobility Plan (SUMP) framework at EU level in 2013**, Spanish municipalities have increasingly adopted SUMP as the principal strategic instrument for guiding urban mobility transitions¹². While initially voluntary, recent national legislative developments (**Ley 9/2025, de Movilidad Sostenible (Law 9/2025 of Sustainable Mobility)**) and funding mechanisms have progressively strengthened their role, particularly for medium- and large-sized cities. The new law gives Autonomous Communities the authority to set corresponding requirements. Furthermore, the **Digital Spain Agenda 2026**¹³,

¹² Garcia-Ayllon, S., Hontoria, E., & Munier, N. (2022). The Contribution of MCDM to SUMP: The Case of Spanish Cities during 2006–2021. *International Journal of Environmental Research and Public Health*, 19(1), 294. (accessed 12/02/2026)

¹³ [Digital Spain 2026-Executive Summary.pdf](#): provides the framework to drive digital transformation in the country operating across three areas; infrastructure and technology (AI and disruptive technologies, boosting connectivity, etc), economy (digitalisation of SMEs and public administrations and fostering digital entrepreneurship) and people (digital skills and inclusion of all citizens).

adopted by the Spanish government in 2020, and the **Recovery, Transformation and Resilience Plan (PRTR)** connects the digital transformation with sustainable mobility policy by embedding digitalisation as a key tool to make transport more efficient, low-carbon and aligned with broader sustainability goals.

At the national level, Spain provides the overarching policy and regulatory framework for sustainable mobility through climate and transport legislation, requirements for the implementation of low-emission zones¹⁴, and financial instruments linked to EU and national funding programmes. These frameworks establish common objectives and minimum requirements, while leaving substantial discretion to municipalities regarding the design, prioritisation, and sequencing of measures. This governance arrangement enables context-specific solutions but also potential challenges in ensuring consistent social outcomes across cities.

At the regional level, the Basque Country Autonomous Community has also emphasised its own territorial planning and obligations rather than just adopting the new national requirements (Table 2). **Law 11/2023, of 9 November, on sustainable mobility in the Basque Country** establishes in Article 16 that urban mobility plans are the planning instrument for sustainable mobility in the municipalities of the Autonomous Community of the Basque Country. In addition, the regional **Energy Sustainability Law 4/2019** recognises mobility plans as part of energy sustainability and requires that these plans be reviewed every 5 years. The Basque law also explicitly integrates participation, accessibility, multi-modal integration, and intergovernmental coordination as planning principles¹⁵. Sustainable mobility is operationalised through the Euskadi Mobility Plan (2025-2035) at a regional level and the Alava Mobility Plan (2025-2034) at a provincial level.

Within this context, Vitoria-Gasteiz has a long-standing tradition of integrated mobility planning, which started in 2006 and predates the formalisation of the SUMP concept at the European and National level. The city's sustainable mobility framework is anchored in the **Plan de Movilidad Sostenible y Espacio Público (PMSEP)**, which functions as the city's SUMP, setting clear strategic goals and actions that regulate space use, traffic and transport behaviour. It also positions digitalisation as a tool to support the decarbonisation, efficiency and resilience of the city's mobility system. This plan integrates with municipal ordinances (traffic/parking), national legal requirements on climate and mobility, and a participatory governance model that engages citizens and stakeholders. It is closely aligned with broader urban, environmental, and climate strategies including Vitoria-Gasteiz's Climate City Contract under the framework of the EU Cities Mission. A few of the local policies/tools that support the implementation of measures set out in the SUMP include:

- Superblocks to reorganise street space and prioritise active mobility
- OTA Parking regulations to manage parking supply and discourage private car use.

¹⁴ Governed by the Climate Change and Energy Transition Act 7/2021, which mandates municipalities with more than 50 000 inhabitants to establish LEZ by 2023.

¹⁵ [Ley 11/2023 de 9 de Nov C.A. P. Vasco \(Movilidad sostenible de Euskadi\) - Iberley](#) (accessed 17.2.2026)

- ZBE (Low Emission Zones) to restrict high polluting vehicles
- Cycling and pedestrian infrastructure investments to expand active modes network
- Public Transit Network Optimisation to improve transit accessibility

Governance arrangements are characterised by a strong technical administration, relative political continuity, and formalised participatory mechanisms, including the **Mobility Forum (Elkargune de Movilidad)** and **Interdepartmental Working Group**.

Vitoria-Gasteiz	
	Autonomous community: Basque Country Province: Álava Comarca ¹⁶ : Vitoria-Gasteiz Population: 260,402 (in 2025) Part of the EU Mission on Climate-Neutral and Smart Cities: Yes

Table 2. Fact sheet of Vitoria-Gasteiz, Spain

2.3.1 Identified policy process

Vitoria-Gasteiz is currently in the process of reviewing and updating the city's SUMP 2026-2030. The SUMP policy process in Vitoria-Gasteiz follows a structured sequence comprising seven (7) phases: data collection, situational analysis, developing scenarios, definition of measures, definition of indicators, budgeting and scheduling, political approval and preparing the final SUMP document. A participatory process is embedded in the various phases,¹⁷ □. This process has facilitated the identification and implementation of a range of sustainable mobility measures suitable for the local context, including the prioritisation of active modes, reallocation of public space, parking management, and the phased introduction of low-emission and traffic-calming measures.

¹⁶ A comarca is a traditional informal territorial division, comprising several municipalities sharing geographical, economic or cultural traits, typically with not well-defined limits.

¹⁷ [Participatory process - CEA - vitoria-gasteiz.org](https://www.vitoria-gasteiz.org/participatory-process) (accessed 17.2.2026)

2.3.2 Observed challenges in the policy processes

According to the City’s evaluation of the PMSEP 2021–2025 and situational analysis¹⁸, although mechanisms to engage citizens like Ekargunes (thematic forums) and Auzogunes (neighbourhoods) exist, the challenge remains in how to reach individuals/groups with less capacity to participate, for example, the elderly, children, low-income residents, and employees in the gig economy and other workers, limiting their influence in the decision-making process and potentially exacerbating inequalities in mobility outcomes. In addition, the coordination with businesses, schools, industrial zones and service providers (for example, cargo bike distribution or carpooling) to support the integration of stakeholders in mobility projects is ad hoc. Without a more structured multi-stakeholder engagement approach, policies may fail to address local barriers to sustainable mobility. These aspects may also result in resistance from citizens and stakeholder groups related to the implementation of certain mobility measures.

Decision-making and implementation are often slowed due to the lack of strategic coordination of different departments and levels of government, leading to inconsistencies in execution and delays in advancing mobility measures. Additionally, integrating the PMSEP and other city and regional-level plans and policies adds another layer of complexity. These bottlenecks may limit the city’s ability to respond effectively to citizens’ diverse mobility needs.

2.3.3 Key stakeholders in the Vitoria-Gasteiz case

The following tentative list of stakeholders (institutions) is identified as a core information source in detecting bottlenecks in the SUMP process of Vitoria-Gasteiz:

National decision-making

- Ministry of Transport, Mobility and Urban Agenda
 - General secretariate for sustainable mobility - responsible for designing, coordinating and implementing national policy on sustainable mobility and transport
- Ministry of Ecological Transition and Demographic Challenges

Regional decision-making

- Autonomous Community of the Basque Country -
 - Department of Territorial Planning, Housing, and Transport leads transport and logistics planning for the region
 - Unit of energy transition and sustainability
 - Department of Governance, Digital Administration and Self-Government coordinates the regions digital transformation agenda

¹⁸ Centro de Estudios Ambientales (CEA), 2025. Evaluación del Plan de Movilidad Sostenible y Espacio público de Vitoria-Gasteiz 2021-2025 and Diagnóstico de la situación general de la movilidad en Vitoria-Gasteiz. Evaluación del PMSEP 2021-2025, accessed 24/02.2026.

Local decision-making

- Ayuntamiento de Vitoria-Gasteiz – Mobility and Urban Planning Department, localises sustainable mobility policies
- Stakeholder engagement: Inter-departmental working group and citizen forums

Related Forums for citizen and stakeholder participation

- Centro de Estudios Ambientales (CEA) - support the city with the coordination and preparation of the SUMP drawing on insights from various studies and pilot initiatives, as well as the follow-up and monitoring of actions.
- Elkargune de Movilidad (Citizens Forum for Sustainable Mobility) - a participatory space bringing together mobility-related associations, neighbourhood associations, sectoral stakeholders, etc.
- Vitoria-Gasteiz Mobility Lab - an innovation and testing hub, which serves as a *digital and technological incubator* for mobility and logistics solutions and supports the development and testing of new digital mobility tools and connects academia, public policy and industry.
- Basque Country Cluster de Movilidad y Logistics - a network ecosystem of companies, public bodies, research centres and other stakeholders that collaborate on innovation, sustainability and competitiveness in *passenger and freight mobility*.

3 Just twin transition in the agrifood sector

3.1 Regenerative agriculture

Regenerative agriculture in Europe remains in the early stages of regulatory development. Currently, there is neither a unified EU-wide legal definition nor mandatory standards for regenerative farming practices¹⁹. Current initiatives are incorporated into broader sustainability and soil health frameworks.

The EU Soil Strategy for 2030 establishes objectives aimed at the protection and restoration of soils, acknowledging their significance for food security, biodiversity, and climate mitigation. The strategy underscores the importance of sustainable land management, enhancement of carbon sequestration, and prevention of soil degradation.

A significant advancement is represented by the introduction of **the EU Soil Monitoring Law** (European Union, 2025), effective as of December 2025. This legislation provides the initial harmonized framework for assessing soil health across Member States, obligating countries to:

- Monitor soil health indicators, including organic matter, erosion rates, contamination levels, and carbon stocks.

¹⁹ Shennan-Farpón, Y., Vion-Loisel, A., van Soesbergen, A., López-Gunn, E., García Asenjo, C., van Delden, H., Douglas, C., & Mulligan, M. (2025). Understanding regenerative agriculture in Europe: An analysis of academic literature, stakeholder perceptions and policy comparing Spain and the UK. *Environmental Science & Policy*, 172, 104172.

- Offer support to land managers through guidance and incentives to implement practices that enhance soil resilience.
- Address principal threats such as erosion, contamination, and carbon loss with targeted interventions.

The agrifood case will explore the policy process in two contexts: in Poland at a national level and in Spain at a regional level (Ibiza). The introduction of **the EU Soil Monitoring Law** (European Union, 2025) allows for exploration in parallel with the policy process.

3.1.1 Observed bottlenecks in the policy process from previous studies or experience

The shift towards regenerative farming practices in primary production is particularly relevant in the context of the twin transition: it creates conditions for inequality because of the investments required. Regenerative farming practices contain more trial-and-error to configure production cycles, typically have lower yields, and as such require new business models to sustain livelihoods. Moreover, regenerative practices are typically data-intensive and require detailed insights into, for example, soil and animal health. This means that farmers without access to the required technologies, knowledge, skills, mindset and/or funding to make the transition are excluded. Young and female farmers are particularly vulnerable groups, as they may have the mindset to do things differently, but their track record is insufficient to raise the necessary funding unless they get the support from their families (e.g. a family farm as collateral).

Just transition concerns are integral to the policy debate, particularly in rural regions where small-scale farmers may face disproportionate challenges in adapting to new regulations. To address this, the Polish government is, for example, expected to prioritise support measures targeting vulnerable groups, ensure access to training and financial assistance, and foster inclusive decision-making. This approach aims to minimise socio-economic impacts and improve resilience in farming communities.

Noting the bottlenecks in the introduction of the Recovery and Resilience Facility (2022) explored in WP1, this task sets out the hypothesis that similar barriers to the integration of sustainable practices across agriculture, food production, and environmental management are likely to be present, especially in the context of a just transition. For farmers, this is a concrete transition rather than a far-from-my-bed Brussels policy, and for regional policymakers, it refers to both European and national policy frameworks that are subject to current changes.

3.2 Regenerative Agriculture in Poland

The implementation of the newly active **EU Soil Monitoring Law**, which came into force in December 2025, follows a policy process at the national level in Poland that draws upon the recent experience of introducing the Recovery Resilience Facility (RRF) by the European Commission in 2022. The RRF's rollout highlighted the importance of coordinated governance structures, cross-sectoral dialogue, and the integration of stakeholder perspectives—elements now informing the approach to soil policy reform.

<p>Poland</p> 	<p>Government: Unitary semi-presidential republic</p> <p>Population: 37,893,970 (2026 census)</p> <p>Agriculture represents:</p> <ul style="list-style-type: none"> 18.7% of total household spending on food and non-alcoholic drinks* 1st place agricultural population in the EU 58% agricultural land of the total land area 36% arable land of the total land area 3.7% of farmland used for organic farming** 1.4 million farms <p>Main sectors: wheat, dairy, cereals, pigs, poultry, horticulture</p> <p>* Eurostat, 2022 ** Eurostat, 2021 https://agriculture.ec.europa.eu/cap-my-country/</p>
---	---

Table 3. Fact sheet of Poland

3.2.1 Identified policy process in Poland

In the Polish context, the Ministry of Agriculture, the Ministry of Environment, and relevant governmental agencies are expected to take the lead in transposing the EU directive into national legislation. This process typically entails establishing a multi-stakeholder task force, including representatives from farmers’ unions, environmental NGOs, scientific institutions, and local authorities. Drawing lessons from the RRF, emphasis is placed on transparent consultation processes and the alignment of national strategies with EU targets for soil health and carbon sequestration.

Governance of regenerative agriculture is central to the policy process, with national frameworks being adapted to support sustainable land management practices and incentivise regenerative approaches. Funding mechanisms and technical support, like those established under the RRF, are anticipated to facilitate farmer participation and capacity building. Monitoring and reporting structures are also being strengthened to ensure compliance with EU requirements and to track progress towards soil restoration goals.

3.2.2 Key stakeholders in Polish agrifood

In Poland, the key stakeholders involved in ensuring a just transition to the EU Soil Monitoring Law for regenerative agriculture practitioners include various organisations, such as:

National decision-makers

- the Ministry of Agriculture, the Ministry of Environment, and relevant governmental agencies.

Environmental groups

- NGOs focused on soil conservation, biodiversity, and climate action. Notable organisations include the Polish Ecological Club (Polski Klub Ekologiczny) and the Coalition Living Earth (Koalicja Żywa Ziemia), which advocate for sustainable land management, monitor policy impacts on ecosystems, and often participate in public consultations.

Commercial entities

- Leading agricultural businesses, agri-food companies, and input suppliers—such as Grupa Azoty, National Food Industry Group, Mondelez Polska, Danone Polska, Cargill Polska, Bayer and major food processors—are involved in the supply chain and have a vested interest in sustainable sourcing and compliance with EU regulations. These companies may also invest in research and innovation supporting regenerative practices.

Farmers' representative groups and cooperatives

- The National Council of Agricultural Chambers (Krajowa Rada Izb Rolniczych), the Polish Federation of Agricultural Producers (Federacja Rolników Polskich), Terra Nostra and various regional farmers' cooperatives represent the interests of smallholders and commercial farmers. These groups play a role in advocacy, capacity building, and ensuring that the voices of practitioners are included in policy development.

Scientific and research institutions

- Universities, such as the Warsaw University of Life Sciences, and research institutes such as the Polish Academy of Sciences Institute of Rural and Agricultural Development and the Institute of Soil Science and Plant Cultivation (IUNG) contribute expertise on soil science, monitoring, and regenerative methods, informing both policy and practice.

Local authorities and government agencies

- Local governments and agencies under the Ministry of Agriculture and the Ministry of Environment, including agricultural advisory services, are responsible for the implementation, monitoring, and support of soil policy at the grassroots level, often coordinating training, funding, and technical assistance for practitioners.

3.3 Regenerative Agriculture in Ibiza, Spain

Regenerative agriculture in Spain is progressing within a broader context of evolving EU sustainability policies, notably the EU Soil Strategy for 2030 and the recently introduced EU Soil Monitoring Law. While Spain faces challenges such as policy harmonisation, administrative fragmentation, and regional disparities, these issues are particularly pronounced in regions like

Ibiza, where local capacity and resources for implementing sustainable practices can be limited (Table 4).

For Ibiza, the new EU Soil Strategy for 2030 brings both opportunities and challenges. The strategy’s objectives—protecting and restoring soils, enhancing carbon sequestration, and preventing degradation—are relevant given the island’s vulnerability to soil erosion, limited arable land, and tourism-related pressures. Effective implementation will depend on Ibiza’s ability to align with harmonised soil health monitoring, access technical support, and secure funding for regenerative practices.

Soil health monitoring will be the key connection point for the digital transition. Regenerative practices are typically data-intensive and require detailed insights into soil and animal health using advanced technologies and methodologies to assess and manage effectively. The monitoring process has the potential to give land managers timely insights into targeted actions and, later, support policy makers with scalable data on soil changes.

In the context of a just transition, Ibiza must address the risk that smaller producers and vulnerable groups are left behind. Ensuring equitable stakeholder engagement, improving coordination across administrative levels, and providing targeted financial and technical assistance will be essential for advancing regenerative agriculture on the island.

Ibiza



Autonomous Community: Balearic Islands
Province: Balearic Islands
Capital city: Ibiza
Largest settlement: Ibiza (pop. 51,872)
Government: Island Council of Ibiza
Agriculture:
Organic production occupies 18.7% of the island’s agricultural land, almost double that of 2020.
Usable organic agricultural area grew by 4.8% in 2024, with an increase of 67 hectares to reach 1,452 hectares.
Largest increase in organic area was in vegetables and tubers, whose organic area increased by 35.4%.
EU “Farm to Fork” strategy aims for 25% of agricultural land to be organic by 2030. Ibiza is currently at 18%.

Table 4. Fact sheet of Ibiza, Spain

3.3.1 Identified policy process in the Spanish agrifood

In Spain, the Ministerio de Agricultura, Pesca y Alimentación is responsible for adapting these EU directives into national policies and action plans. This involves coordinating with other ministries, such as those for environment and rural development, to ensure policy coherence and to address cross-cutting issues like soil health, biodiversity, and climate change. The Ministry develops national frameworks and guidelines, allocates funding, and sets up monitoring and reporting mechanisms in line with EU requirements.

Responsibility for implementation is devolved to Spain's autonomous communities. The regional government in the Balearic Islands receives policy directives, funding streams, and technical guidance from the national government. Regional authorities are then tasked with adapting these frameworks to local circumstances, engaging relevant stakeholders (such as farmers, landowners, and local councils), and administering support measures for regenerative agriculture and soil health initiatives locally. The stakeholders are regional agricultural departments, environmental agencies, and local actors to ensure that the Directive's objectives are effectively realised in Ibiza's unique social and ecological context. Challenges such as administrative fragmentation, limited regional capacity, and disparities in resources are common barriers to this policy flow.

3.3.2 Key stakeholders in the Spanish agrifood case

Examples of the types of stakeholders (institutions) in the regional decision-making of Ibiza are as follows:

National decision-making

- Ministerio de Agricultura, Pesca y Alimentación

Regional decision-making

- The **regional government** is the Parliament of the Balearic Islands.
- The **Consell Insular d'Eivissa** is the governing institution of the island of Ibiza, a local administration.

Environmental organisations

- **GEN-GOB Eivissa** (Grup d'Estudis de la Naturalesa – Grup Balear d'Ornitologia i Defensa de la Naturalesa) is a local NGO actively involved in environmental advocacy, sustainable agriculture, and biodiversity protection on the island.
- **Amics de la Terra Eivissa** (Friends of the Earth Ibiza) promotes agroecology, soil health, and climate action.
- **Ibiza Preservation Fund** also plays a significant role as a non-profit foundation for the conservation and regeneration of Ibiza and Formentera – funding, implementing and managing environmental projects, monitoring socio-environmental indicators, and inspiring positive action at local government, business and community level. They build consensus and form alliances across all sectors: land protection, biodiversity, marine conservation, NGO strengthening, water management and waste.

Farmers' groups and cooperatives

- **Cooperativa Agrícola de Sant Antoni** and **Cooperativa Agrícola de Santa Eulalia** are two of the main agricultural cooperatives in Ibiza. These cooperatives support local farmers with technical assistance, marketing, and access to sustainable agricultural practices.
- **Regenerative Agriculture Ibiza Network** (Red de Agricultura Regenerativa de Ibiza) is an informal community of practitioners, educators, and consultants advancing regenerative methods on the island. This network often collaborates with local farms such as **Can Fuster** and **Terra Masia**, which are notable for pioneering regenerative and organic farming techniques in Ibiza. These stakeholders work in partnership with regional authorities and research institutions to scale up regenerative agriculture and ensure that local voices are included in policy development and implementation.
- **APAEFF** is the Asociación de Productores de Agricultura Ecológica de Ibiza y Formentera – and involves a diverse group of producers—both women and men—who work according to the principles of organic farming. The association is structured into four groups, which represent the different types of agricultural and livestock activities carried out on the island. Each of them contributes its own expertise, knowledge, and products, helping to build a model of sustainable production that is environmentally respectful and committed to quality.

4 Next steps

4.1 Timeline and data collection plan

Interviews with key stakeholders in both case areas, namely mobility and agrifood, are planned during the period March 2026 to the end of January 2027. Other interactions, like workshops, are organised in conjunction with the case study planned in WP3, because many of the key stakeholders are already integrated in the cases, and some activities are planned (Figure 5). However, the main data collection that support desk research will be performed in individual or group interviews with the key stakeholders identified for each case. To reach a multi-stakeholder approach, we aim to interview representatives from all the different types of stakeholders - civil servants in the ministries, municipality and city, development agencies, NGOs, commercial actors, producers, and so on, depending on the case. However, keeping our focus on addressing decision-makers involved in the identified policy processes in each case.

The investigation level of the mobility and agrifood cases varies. While mobility cases in Helsinki and Vitoria-Gasteiz and the agrifood case of Ibiza adopt a lens to regional and municipality level decision-making, the Polish agrifood case looks at national decision-making. Due to these differences, the research designs are likely to slightly vary.

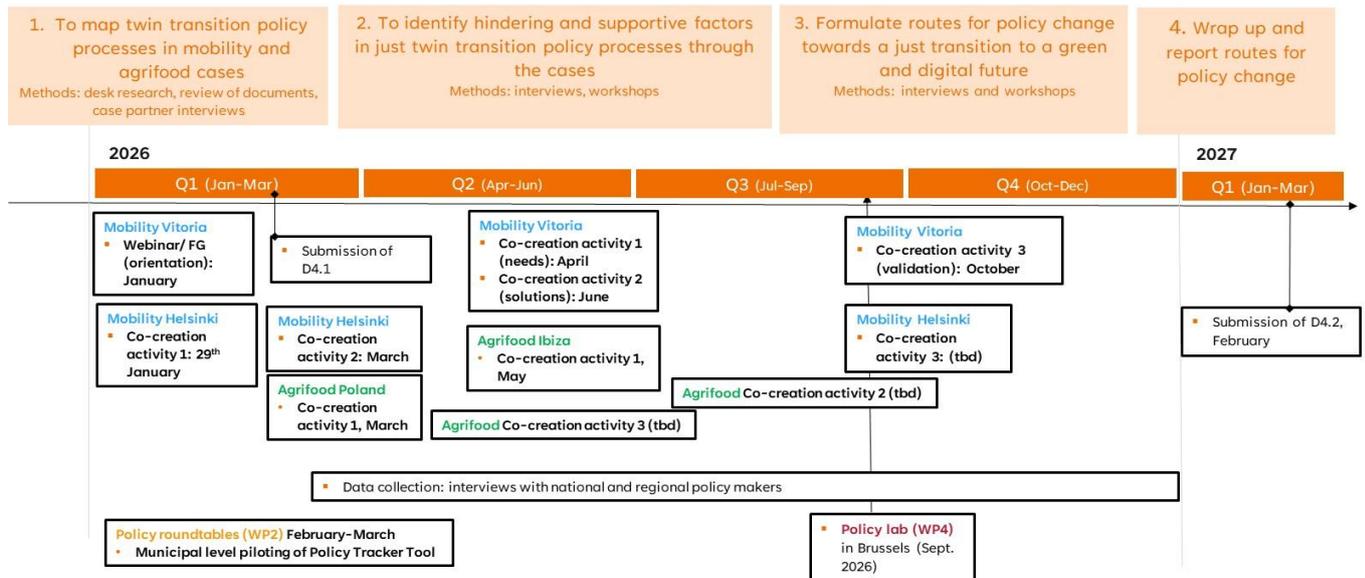


Figure 5. Planned activities for data collection to detect policy processes challenges

4.2 The conceptual approach

Our conceptual approach in T1.4 follows a framework²⁰, which introduces six justice dimensions and six policy intervention points (Figure 6), and we aim to translate what they mean for twin transition policy processes. Furthermore, our approach to studying the regional and national levels supplements a recent study²¹ that focused on just twin transition processes at the EU level, and the previous Readjust work in WP1²² that analysed twin policies. Approaching policy processes from the bottom up is hoped to reveal unnoticed injustices and novel solutions for tackling inequalities at the more hands-on decision-making at the regional level, compared to national and European levels.

According to research²³, justice issues deserve attention across all the policy intervention points that emphasise exploring a variety of justice perspectives, like capacity justice that addresses equal capacity to respond to transition demands or recognition justice focusing on how differences are respected.

²⁰ Kaljonen, M.; Paloviita, A.; Huttunen, S.; Kortetmäki, T. (2024). Policy mixes for just transitions: A holistic evaluation framework. *Environmental Innovation and Societal Transitions*, 52, 100885.

²¹ Schwäbe, C.; Daimer, S.; Krauter, T.; Zenker, A. (2026, forthcoming): Governing the interrelation of digital and sustainable innovation - The role of the EU in integrating the twin transitions. On behalf of the German Environment Agency. Dessau-Roßlau.

²² Stadler et al. (2025). Report on synergies and commonalities in policies, strategies and programmes related to twin transitions in EU policies. Deliverable 1.1 of the Readjust project.

²³ Kaljonen, M.; Paloviita, A.; Huttunen, S.; Kortetmäki, T. (2024). Policy mixes for just transitions: A holistic evaluation framework. *Environmental Innovation and Societal Transitions*, 52, 100885.

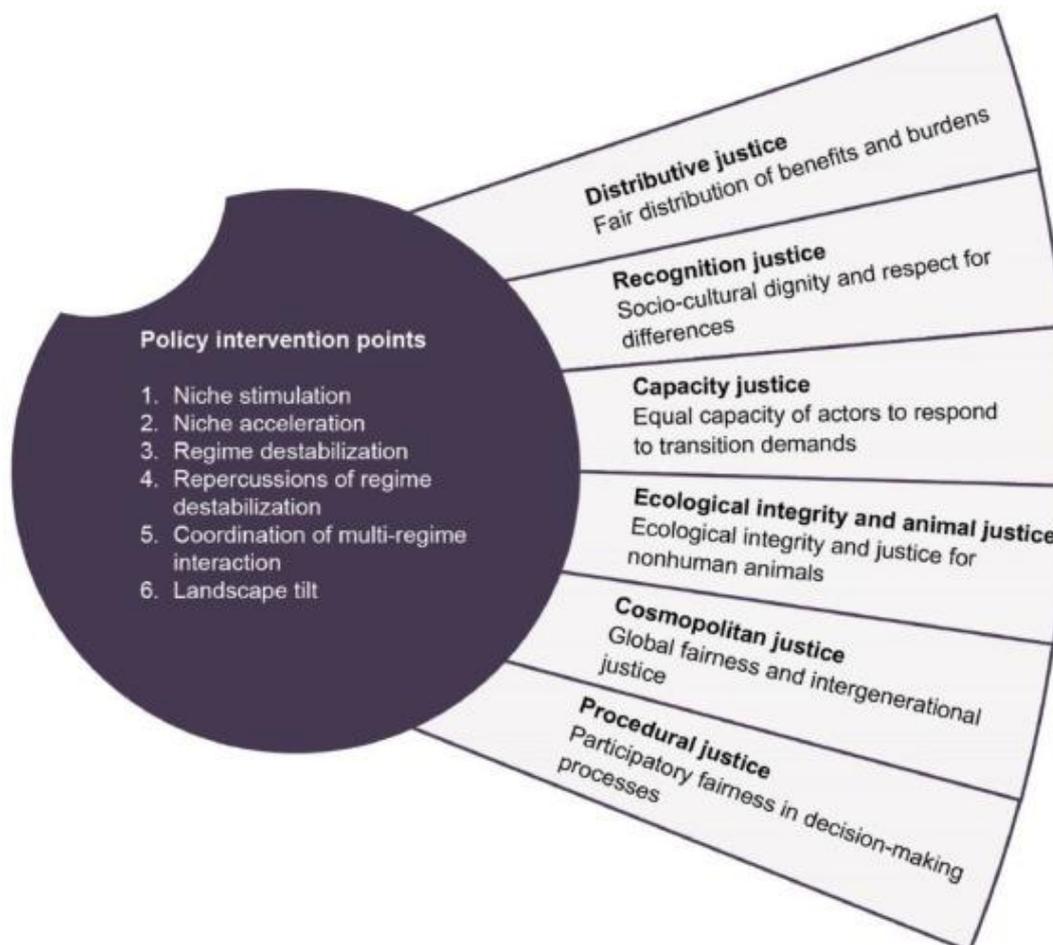


Figure 6. Different justice perspectives. Adopted from Kaljonen et al., 2024.

To investigate bottlenecks and enablers in policy processes in different case contexts, we apply a research design that relies on individual and group semi-structured interviews. In addition, the workshops performed in WP3 will provide additional information on twin policy processes. The proposed interview themes are:

- 1) Combining twin objectives, namely sustainability and digitalisation, in policy processes – what kind of **tensions** exist between different values, objectives and outcomes, and how these are reflected in decision-making processes?
- 2) Justice in twin transition – how **justice** is understood and addressed in the specific policy process? What kind of challenges are encountered in addressing justice in twin transition? Here, we aim to go beyond distributive and procedural justice and address the subjectivity of justice in different contexts.
- 3) Solutions to reach just twin transition policies – what (practical) **solutions** do the interviewees envision on the one hand for better addressing the twin component, i.e. integrating sustainability and digitalisation aspects, and on the other hand, integrating different justice dimensions in policy processes?

5 References

CEA - Centro de Estudios Ambientales. [Proceso participativo - CEA - vitoria-gasteiz.org](https://www.vitoria-gasteiz.org/ceaprocesoparticipativo/) (accessed 17.2.2026)

Centro de Estudios Ambientales (CEA), 2025. Evaluación del Plan de Movilidad Sostenible y Espacio público de Vitoria-Gasteiz 2021-2025 and Diagnóstico de la situación general de la movilidad en Vitoria-Gasteiz. [Evaluación del PMSEP 2021-2025](#), accessed 24/02.2026.

European Commission. https://urban-mobility-observatory.transport.ec.europa.eu/sustainable-urban-mobility-plans/sump-guidelines-and-decision-makers-summary_en (accessed 30.1.2026)

García-Ayllon, S., Hontoria, E., & Munier, N. (2022). The Contribution of MCDM to SUMP: The Case of Spanish Cities during 2006–2021. *International Journal of Environmental Research and Public Health*, 19(1), 294. <https://doi.org/10.3390/ijerph19010294>

Kaljonen, M.; Paloviita, A.; Huttunen, S. & Kortetmäki, T. (2024). Policy mixes for just transitions: A holistic evaluation framework. *Environmental Innovation and Societal Transitions*, 52, 100885.

LEY 11/2023, de 9 de noviembre, de movilidad sostenible de Euskadi. - Boletín Oficial del País Vasco de 23-11-2023 (In Spanish, accessed 17.2.2026)

Muench, S., Stoermer, E., Jensen, K., Asikainen, T., Salvi, M. & Scapolo, F. (2022). Towards a green and digital future, Publications Office of the European Union, Luxembourg. <https://data.europa.eu/doi/10.2760/977331>, JRC129319

Schwäbe, C.; Daimer, S.; Krauter, T.; Zenker, A. (2026, forthcoming): Governing the interrelation of digital and sustainable innovation - The role of the EU in integrating the twin transitions. On behalf of the German Environment Agency. Dessau-Roßlau.

Shennan-Farpón, Y., Vion-Loisel, A., van Soesbergen, A., López-Gunn, E., García Asenjo, C., van Delden, H., Douglas, C., & Mulligan, M. (2025). Understanding regenerative agriculture in Europe: An analysis of academic literature, stakeholder perceptions and policy comparing Spain and the UK. *Environmental Science & Policy*, 172, 104172.

Stadler et al. (2025). Report on synergies and commonalities in policies, strategies and programmes related to twin transitions in EU policies. Deliverable 1.1 of the Readjust project.

Traficom (2024). Kestävän kaupunkiliikenteen suunnittelun ja liikennejärjestelmäsuunnittelun yhteensovittaminen. KaupsuSUMP-hankkeen loppuraportti. Traficom in julkaisu 4/2024 https://traficom.fi/sites/default/files/media/publication/KaupsuSUMP_raportti.pdf (In Finnish, accessed 30.1.2026)