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*Niemand achterlaten? Milieuongelijkheden en de rechtvaardige transitie in Brusselse milieuplannen*

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## EDITOR'S NOTE

In order to view the figures in higher resolution, go to the article online and click "Original" below them.

## AUTHOR'S NOTE

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## Introduction

1 The Brussels-Capital Region (BCR) is marked by a wide array of social-ecological inequalities in spatial terms and within society, as documented in scientific and policy literature. In a comprehensive review of the literature, De Muynck *et al.* [2021;

forthcoming] correlated environmental justice theory and empirical research at the level of Brussels, and identify multiple environmental inequalities particularly relevant in the Brussels context: the unequal distribution of environmental quality among social groups, their unequal impact on the environment, their unequal ability to act upon and respond to the quality of their environment and the policies that shape it, and the unequal impact of the environmental policies themselves.

2 Though the ways in which different environmental advantages and disadvantages are distributed depend on the particular phenomenon under scrutiny (e.g. access to green space, exposure to air pollution, participation in environmental decision-making, etc.), some general considerations can be made. A 2024 report by the regional administration for the environment, focusing specifically on environmental risks with a direct impact on health, for instance, shows that environmental disadvantage, including higher exposure to risks and lower access to amenities, is concentrated in areas with a relatively higher population density, which also tend to be the poorest [Bruxelles Environnement, 2024a]. The report also emphasises that lower-income populations are typically more vulnerable to environmental risks because of their living conditions, lower capacity to mitigate environmental nuisance through private investments, and greater difficulty navigating administrative procedures or making a claim or a complaint. Barriers to action are allegedly socio-economic, including language difficulties, the complexity of administrative procedures, level of education, limited income or tenant status.

3 While academic attention regarding the intertwining of environmental and social difference in Brussels is growing, less is known about how environmental policy comprehends and addresses this. In this context, our paper investigates how environmental policy in the BCR frames and responds to these inequalities. Our analysis sheds light on the types of environmental inequalities that are acknowledged, problematised and addressed; which public is targeted in virtue of which characteristics; and finally, how these inequalities are addressed by putting to work different forms and notions of justice. From a theoretical perspective, the article calls upon the concepts of just transition [see Fransolet and Vanhille, 2023] and environmental justice [Schlosberg, 2007; Walker, 2012; Coolsaet, 2021; Coolsaet *et al.*, 2025]. Empirically, we focus on the environmental pluriannual plans and strategies of BCR, focusing on the language and explicit ambitions which are put forward in official documents.

4 At a time when questions of environmental and social justice are increasingly invoked in public debate but are rarely operationalised and specified, this paper aims to contribute to the ongoing policy, civic and academic discussion in Brussels and beyond.

# 1. Theoretical framework

5 There is a wealth of research, policy and civic action seeking to bridge environmental and social issues and the way they intertwine, leading to a proliferation of related concepts and terminologies: environmental justice, social-ecological justice, just sustainabilities or just transition. In this paper, we refer particularly to the “just transition”, which is defined as a process of systemic transformation aimed at addressing social inequalities and ecological degradation in an integrated manner [Fransolet *et al.*, 2025]. Grounded in a social-ecological justice framework [Fransolet and

Vanhille, 2023], this conception "emphasises the interlinkages and interactions between social and ecological developments" [Grossmann *et al.*, 2022: 1411]. The concept of just transition is relevant due to its political connotation: in contrast to terms such as "inclusion" or "solidarity", that of "justice" moves beyond simply "being kind" to people in precarious positions or striving for inclusiveness, and entails a full recognition of everybody's right to the city [da Schio *et al.*, 2023]. It is also relevant due to the emphasis that the term "transition" places on the process of change and on how societies move towards sustainability, equity and justice: the just transition is about a process rather than a final destination.

6 The concept has gained increasing political traction on multiple scales [Stevis and Felli, 2020; Bauler *et al.*, 2021], appearing in the Paris Agreement (2015), in the COP26 Just Transition Declaration (2021) and the European Green Deal (2019), where instruments such as the Social Climate Fund and the Just Transition Mechanism seek to operationalise its principles. The just transition has also been the subject of a wide-ranging societal dialogue in Belgium, as part of the General Estates for a Just Transition[1].

7 To understand how the just transition is operationalised in environmental plans, we consider three complementary elements: the objects distributed (the "what"), the subjects (the "who"), and the normative principles of the underlying justice claim-making (the "how") [Bell, 2004; see also Walker, 2012: chap. 3]. The objects are the different material and symbolic elements that are or should be "distributed" in a just manner, such as environmental goods and burdens, the contribution to environmental degradation, the impacts of environmental policies (distributive inequality), the power to participate in environmental decision-making (procedural inequality), and the recognition of specific needs and vulnerabilities (recognition-based inequality) [Laurent, 2023; Schlosberg, 2007]. The subjects are those who matter in justice claim-making, considering spatial and temporal inequalities between individuals and groups within the same generation (intra-generational inequality), individuals and groups of different generations (intergenerational inequality), humans and non-human beings (interspecies inequality, also referred to as ecological inequality), and individuals and groups living within and beyond a given territory (global inequality) [Hazrati and Heffron, 2021; Gupta *et al.*, 2023; Rockström *et al.*, 2023].

8 The third element (i.e. the normative principle) concerns the way in which the objects should be distributed among the subjects. An explicit reflection on this element is critical in distinguishing two terms that are sometimes confused or used interchangeably, namely inequality and injustice. Inequality is

> "a *descriptive* term, describing a condition of difference or unevenness of something (such as income, health, pollution exposure/creation, opportunity, influence, access to resources, consumption of resources) between different groups of people (old/young, black/white, rich/poor, global north/south, this generation/future generation, etc.)" [Walker, 2012: 12 emphasis in the original].

9 Inequality may typically be measured using various forms of data and information. Measuring inequality, moreover, does not involve evaluating it: inequality is not inherently inappropriate or unfair. These considerations are, in fact, a matter of justice.

10 As opposed to inequality, the concept of injustice implies a *normative* claim about how environmental goods and bads should be distributed, and about the principles that

should govern (re)distribution processes. This makes justice claims always historically and geographically situated, and often fragmented and contested [Velicu and Kaika, 2017].

11 There are different principles of justice. According to an egalitarian principle, for instance, goods and bads should be distributed equally throughout society, in order for everyone's condition to be the same without consideration of different subjectivities [Gupta *et al.*, 2023]. Other principles focus on solidarity, predicating that environmental goods and burdens should be distributed in proportion to subjects' needs and vulnerabilities, with those who are more in need receiving more goods, and the most vulnerable being specifically protected from hazards. Another approach, in turn, focuses on merit and responsibility and postulates that goods and bads should be distributed in proportion to people's contribution (e.g. the "polluter pays" principle). Other principles include sufficientarianism, which entails guaranteeing the satisfaction of minimum needs for all; limitarianism, implying the limitation of excessive resource use; and prioritarianism, which involves prioritising the situation of those worst-off [Gupta *et al.*, 2023].

12 Examining how environmental policy addresses the unequal distribution of various environmental amenities and risks (the "what") among different social groups (the "who") and according to which principles (the "how"), is critical in order to illustrate a city's understanding of a just transition and its aim to achieve it. This is the purpose of the next sections.

## 2. Materials and methods

13 We undertook a qualitative content analysis of the pluriannual environmental plans and strategies of the Brussels-Capital Region. While these documents capture only a fraction of how just transition principles are interpreted and operationalised in urban policymaking, they provide a distinct analytical advantage. They offer an official record of language negotiated and institutionalised through an extended process of multi-actors editing, technical refinement and political revision.

14 To compile the empirical material, we drafted an initial list of policies on the basis of the inventory made in the 2024 regional State of Environment Report [Bruxelles Environnement, 2024b]. We expanded the search by reviewing the website of the regional administration for environment (https://environnement.brussels/), analysing the references included in the identified plan, and using internet search engines (search words included: "Plan", "Environnement", "Bruxelles", and specific themes such as "energy", "green spaces", etc.). This allowed us to complete the initial list with policies not included in the report, for example because they were adopted after the publication of the report or needed to be adapted when a pluriannual plan had been replaced by a new one.

15 Within this list, we selected the plans fulfilling the following conditions: they primarily focus on environmental issues; they have a strategic scope; and they focus on the whole of the regional territory[2]. We also excluded legal texts, technical documents, national plans, and texts focusing only on parts of the regional territory. The final list consists of 14 policy documents adopted between 2016 and 2024, listed in Table 1.

Table 1. Regional environmental plans and strategies in the Brussels-Capital Region, listed in chronological order

| Policy document | Alternative name / acronym used | Institution as explicitly indicated in the plan | Year | Pages |
|---|---|---|---|---|
| Regional Nature Plan 2016-2020 in the Brussels-Capital Region | Plan Nature | Bruxelles Environnement | 2016 | 157 |
| Resources and Waste Management Plan | Plan Déchets | Unassigned | 2018 | 78 |
| Regional Sustainable Development Plan | PRDD | Région de Bruxelles Capitale | 2018 | 180 |
| Plan for the Prevention and Control of Noise and Vibration in Urban Areas | Quiet Brussels | Bruxelles Environnement | 2019 | 80 |
| Strategy for reducing the environmental impact of existing buildings in the Brussels-Capital Region by 2030-2050 | Stratégie Rénolution | Unassigned | 2019 | 141 |
| Regional mobility plan 2020-2030<br>Strategic and operational plan | Good Move | Bruxelles Mobilité | 2020 | 292 |
| Low Emission Mobility Brussels<br>On the road to low-emission mobility. | LEM roadmap | Bruxelles Environnement | 2022 | 68 |
| ShiftingEconomy.Brussels<br>Regional Economic Transition Strategy 2022-2030 | Shifting Economy | Bruxelles Environnement, Bruxelles Économie et Emploi, Hub Brussels, Innoviris | 2022 | 158 |
| Good Food Strategy #2<br>2022 – 2030 | Good Food | Région de Bruxelles Capitale | 2022 | 61 |
| Strategy for pollinating and auxiliary insects in the Brussels-Capital Region 2023-2030 | SIPA | Bruxelles Environnement | 2022 | 22 |
| Water Management Plan of the Brussels-Capital Region for the period 2022-2027 | PGE | Bruxelles Environnement | 2023 | 807 |
| Regional Air-Climate-Energy Plan | PACE | Bruxelles Environnement | 2023 | 188 |
| Regional Program for the reduction of pesticides 2023-2027 | PRRP | Bruxelles Environnement | 2023 | 43 |
| Good Soil Strategy | Good Soil | Bruxelles Environnement | 2024 | 17 |

16 We imported the French version of these plans into NVivo, a computer-assisted qualitative data analysis software. Using NVivo functionalities, we analysed the documents to identify their explicit ambitions and provisions for realising a just transition. Our analysis focused on the explicit language used in the documents themselves, rather than their possible and actual impacts. The approach was iterative and involved several tasks. First, we screened all documents to identify concepts linked to inequality and injustice and coded them thematically under three broad categories: acknowledgements of inequalities or injustice, ambitions to address them, and concrete provisions to do so. This task allowed us to identify all provisions (and, in general, all portions of text) related directly and indirectly to a just transition, apprehend the specific language that was used, and isolate the key notions and concepts. We then ran text and word frequency queries, using NVIVO data exploration functions, based on keywords from the literature and our initial screening to refine and complete the coding. Finally, we conducted an in-depth examination of the coded text to assess what types of inequalities were explicitly acknowledged and tackled, among whom, and which normative ideals of justice were put forward.

# 3. Results

## 3.1. Objects and subjects of environmental inequalities

17 Our analysis of how different plans acknowledge environmental inequalities reveals a diverse landscape. Overall, we do not observe any systematic effort to illustrate the empirical evidence of such inequalities or to explain which inequalities would be relevant within a certain policy context, or why. While references to environmental inequalities are present, they are dispersed and unsystematic.

18 Acknowledgements of inequality vary in form and substance. Some plans, such as the PRDD, explicitly refer to the socio-spatial divide as a key feature of the Brussels context, and a challenge that the plan should address[3]. This is also the case of the Plan Nature, which speaks of "a real socio-environmental inequity between residents of the city centre and inner suburbs on the one hand, and residents of more peripheral areas located in the green belt on the other"[4].

19 In the Plan Nature and in Quiet Brussels, there is the notion of "deficit areas" (or "zones de carence") in terms of green spaces and quietness, respectively. These areas are defined in contrast to those where green spaces and quiet areas are available, with a precise cartographic method, and are presented to prioritise policy action. Good Move, in turn, paints a portrait of the unequal accessibility experienced by different groups within the Brussels population, providing a rationale for including a "social" dimension in its vision for the city (see section 3.2. below).

20 In other cases, acknowledgements of inequalities are developed to a much lesser extent, both in terms of scope and length of text. They take the form of maps showing the spatial distribution of certain environmental qualities (e.g. noise pollution or water quality), or of qualitative or quantitative information showing the extent to which one segment of the Brussels population or the economic fabric is exposed to certain risks. In many cases, acknowledgements of inequality are made in the form of summarised claims that the Brussels population is characterised by different socio-economic

situations. This is the case of the LEM Roadmap[5], which explains that "Given the socio-economic characteristics of the Brussels population, it is strongly requested that sufficient account be taken of the impact on low-income families/individuals".

21 Another way to approach the issue of inequality consists in acknowledging the existence of socio-environmental disadvantage. References to concepts of energy, water, food and mobility poverty exist in the plans related to these themes. All these concepts, which we can be categorised as environmental deprivation or environmental poverty, have the merit of putting emphasis on the inextricable link between social and environmental questions.

22 The objects under consideration – the "what" of inequalities – reflect the thematic focus of each plan and can be organised into several categories. In many cases, this involves environmental risks such as exposure to air and water contamination, noise, pesticides or climate impacts such as thermal stress and floods. A second category includes socio-environmental amenities, such as green cover or green spaces, accessibility to public spaces, and housing-related benefits such as acoustic and thermal comfort. In some cases, an environmental amenity is simply the absence of a risk, e.g. clean air, as the absence of air pollution. One case involves citizens' satisfaction regarding the availability of green space[6]. A particularly relevant category concerns amenities that are both enjoyable per se, and instrumental in reducing a person's environmental impact. Telling examples include access to a sustainable and healthy diet (in Good Food), or sustainable transport infrastructure, such as public transport routes, bike lanes, carsharing and e-car charging stations (in Good Move). A similar category seen in some plans concerns the ability to participate in the transition, reflected in the budget available for renovations, access to recycling or ownership of a bicycle or public transport pass. Crucially, while these categories address unequal access to environmental goods and services, there is little acknowledgement of inequalities in terms of responsibility for environmental degradation. A notable exception is the PGE, where there is a focus on disparities in drinking water consumption. Finally, let us mention the category concerning the socio-economic impacts of environmental policy, including both the positive benefits (e.g. access to bonuses) and negative burdens (e.g. increased costs). The LEM Roadmap, for instance, acknowledges that the financial impact of the ecological transition may be greater for small businesses and organisations[7], while the PACE explicitly details its potential negative impacts, such as reduced housing affordability[8].

23 The analysis of the subject of inequalities reveals which groups are recognised and which risk invisibilisation. The plans frequently use broad categories such as "least privileged people" or "precarious profiles", though more specific differences across social groups and in spatial terms are also mentioned. From a social perspective, the level of revenue appears prominently as a recognised factor of social difference. Other factors include age, gender, health status, disability, and household composition. Education level, access to information, employment characteristics (e.g. irregular work schedules) and economic sector are also mentioned. In some cases, difference is defined in terms of ownership status (e.g. whether one owns or rents one's home or owns a car). From a spatial perspective, inequalities are acknowledged at multiple scales. Within the Brussels-Capital Region, distinctions are made between central areas and inner- and outer-ring neighbourhoods; dense urban cores versus peripheral zones; and specific urban areas such as the canal zone and the croissant pauvre. Broader

geographical comparisons also emerge, highlighting disparities between municipalities within the region, the region and its suburbs, urban and rural areas, and Brussels and other Belgian cities or regions.

## 3.2. The concept of justice and other social ambitions

24 After these questions related to (in)equality, we analyse those related to (in)justice, with an initial focus on the engagement of these plans with the concept of justice through the textual use of the term and its declinations. A text search of the term "justice", alongside similar concepts and stemmed words, shows that it is present in 10 of the 14 plans analysed, although at different levels and in different contexts (see Table 2, below).

Table 2. Use of keywords related to social justice (number of times)

| Environmental plans | Year | Inequality | Justice | Equity | Solidarity | Ethics | Inclusion |
|---|---|---|---|---|---|---|---|
| | | 8 plans | 10 plans | 10 plans | 10 plans | 3 plans | 8 plans |
| Plan Nature | 2016 | 2 | 1 | 3 | 9 | 1 | |
| Plan Déchets | 2018 | 1 | 4 | 2 | 4 | | |
| PRDD | 2018 | 24 | 1 | 3 | 7 | | 3 |
| Quiet Brussels | 2019 | 2 | | 1 | 1 | | |
| Stratégie Rénolution | 2019 | | 2 | | | | 2 |
| Good Move | 2020 | 4 | 2 | 2 | 2 | | 2 |
| LEM Roadmap | 2022 | | 2 | 2 | 3 | | 6 |
| Shifting Economy | 2022 | 12 | 8 | 7 | 4 | 7 | 31 |
| Good Food | 2022 | 7 | 11 | 2 | 4 | | 7 |
| SIPA | 2022 | | | | | | |
| PGE | 2023 | | 6 | 8 | 8 | | 1 |
| PACE | 2023 | 6 | 25 | 3 | 7 | 2 | 9 |
| PRRP | 2023 | | | | | | |
| Good Soil | 2024 | | | | | | |

Search strings, in French: Inequality: inégal* OR disparité* OR dual* | Justice: just* OR injust* (coding was removed when the results were related to meanings such as "justification", "merely" or "legal justice") | Equity: équit* OR iniquité OR inéquit* | Ethics: éthique | & Solidarity: solida* | Inclusion: inclusi*.

25 Generally speaking, the concept is used as an adjective – as in "just" – qualifying the transition aimed at or the society to be, or as a noun defining a principle that needs to be considered in the implementation of the plan. This concept appears prominently in the PACE, which explicitly cites the principles of social justice and a just transition. In the introductory sections, these principles are defined in terms of ensuring that the benefits of the transition benefit everyone[9], preventing and reducing social inequalities, and situation of precarity[10].

26 In the same policy, we also find different nuances. Addressing the issue of international climate finance, the PACE calls upon the concept of climate justice, referring to questions of differentiated responsibilities and the mismatch between responsibility for climate change and vulnerability in terms of its impact[11]. There are also references to jobs that are threatened by the transition: in this context, justice is intended as reconversion and training for those who are most exposed[12].

27 In other cases, the concept of the just transition is equated with an effort to "pay attention" to everyone, in particular to the most vulnerable, for example through measures to accompany the transition or to ensure that households' expenditures (e.g. for mobility) remain reasonably low[13]. It is also used as a qualification of the cost of certain goods and services. The concept of the "just price", in particular, is applied to various goods and services, such as products, food and water. However, its meaning varies. In the Plan Déchets, a "just price" is one that takes into account environmental externalities of consumption[14]. In other cases, it refers – rather vaguely – to the remuneration of producers, workers, or more generally production costs[15]. It is worth pointing out that tension might exist between these conceptions of justice focused on fairness to producers, and other considerations centred on consumers and the affordability of goods and services.

28 However, in many cases, the use of the concept remains brief and concise, with its intended meaning remaining implicit. This vague and superficial use weakens the concept, depotentiating it and emptying it of its transformational charge.

29 Beyond the simple presence of expressions related to the just transition, many plans articulate ambitions to address "social" questions. Ten plans include a "social" component in their general sections, albeit with varying nuances and framing as illustrated in Table 3.

Table 3. "Social" elements in the general sections of the pluriannual environmental plans of the BCR

| **Plan** | |
|---|---|
| Plan Nature | **Section: Two major ambitions and seven major strategic objectives**<br>"Principle of equity for all. In application of this principle, the Brussels-Capital Region aims to ensure a quality environment for all Brussels residents and to offer fair access to green spaces and nature for all." (pp. 18-19) |
| Plan Déchets | **Section: The guiding principles**<br>"Polluter pays principle: the Government will ensure compliance with this principle, defined as the obligation of the person responsible for pollution to bear the direct and indirect expenses incurred by the measures to prevent, reduce and repair the pollution it has caused." (p. 32) |

| | |
|---|---|
| | "Principle of solidarity: the Government will ensure that the implementation of the Plan concerns all stakeholders in a positive manner and particular attention will be paid to vulnerable groups (the elderly, people in precarious situations, etc.) in order to ensure action adapted to their capacities. Solidarity also concerns our own responsibility in the world." (p. 33) |
| PRDD | **Section: A city in transition: relevant territory and scales**<br>"[...] solidarity must strongly permeate territorial policies. The right to the city must be the basis for the interpretation of any territorial approach." (p. 18) |
| Quiet Brussels | **Section: Objectives of the plan**<br>"Social: [...] [T]he primary aim is to enable everyone to have time to rest and relax, thereby increasing access to and time spent in peaceful surroundings. [...] It is also about avoiding a dualisation of the city by providing sufficient places for everyone to unwind." (p. 19) |
| Stratégie Rénolution | n/a<br>While in its general sections the Strategy refers to environmental objectives of reducing $CO_2$ emissions, its first chapter nevertheless has a "social" component.<br>**Section: An accessible transition for precarious households**<br>"One of the key measures to ensure access to decent housing for all is to control this potential increase [in rents]." (p. 11) |
| Good Move | **Section: City Vision (part of the objectives)**<br>"Social: The Region has therefore adopted the principle of "universal accessibility" of public space, public buildings and public transport, also to be applied to the mobility offer in general, so that it is designed to be used by all users, regardless of their physical or cognitive abilities and financial resources." (pp. 42-43) |
| LEM Roadmap | **Section: Guidelines for the transition**<br>"Inclusive approach: the policy put in place is socially fair and takes into account those for whom the transition is (more) difficult for personal or professional reasons." (p. 12) |
| Shifting Economy | **Section: Definition and objectives of the economic transition**<br>"To achieve these goals, the transition will be [...] social, in order to promote a fair and inclusive society and an economic model that does not generate inequalities." (p. 16) |
| Good Food Strategy #2 (GFS2) | **Section: Four cross-cutting principles of strategy**<br>"A principle of social inclusion, health, and food sovereignty applied systematically. [...] The GFS2 takes into account the fact that the Brussels population is cosmopolitan, with unequal incomes and includes one in three households with an income below the poverty line. The GFS2 is therefore resolutely more inclusive and more social. It will participate at its own level in the reflection and redefinition of a fair price for farmers." (p. 26) |
| SIPA | n/a |
| PGE | n/a |

| | |
|---|---|
| | If the general sections of the PGE mainly refer to environmental objectives of water quality, it should be noted that the "social" appears within one of the main axes structuring the measures of the plan.<br>"Axis 4: Ensure the recovery of the costs of services related to the use of water, and provide access to water at an affordable price for all." (p. 590) |
| PACE | **Section: Principles guiding regional climate policy**<br>"The principle of social justice and just transition, which implies that the prevention and reduction of social inequalities and precarious situations should be an integral part of the development and implementation of climate policies." (p. 19)<br>"The polluter-pays principle, defined as the obligation of the polluter to bear the direct and indirect expenses incurred by the measures to prevent, reduce and repair the pollution they have caused." (p. 20) |
| PRRP | **Section: Five priority areas**<br>"3. Strengthening the protection of vulnerable groups, including professionals." (p. 20) |
| Good Soil | n/a |

## 3.3. Four normative ideals of justice

30 Ambitions to address different forms of socio-environmental inequalities are also present throughout the policy documents, either as declared intentions or as specific measures. Analysing these ambitions reveals four normative ideals according to which the plans seek to distribute environmental benefits, burdens and responsibilities ("the how" of the just transition).

### 3.3.1. The principle of universal provision: "for all"

31 A common approach to dealing with inequalities is one that actually sidelines them, i.e. an approach of (declared) universal provision. Though different formulations are present, the typical postulate is that "all Brussels citizens" should benefit from given environmental amenities or be protected from environmental harm. In some cases, this is further specified in terms of which social difference should not be a factor of disadvantage, very frequently that of income, but also – more sporadically – physical condition, gender, place of residence or cultural background. In Good Move, for instance, the issue is discussed in terms of "universal accessibility" to public spaces, governmental buildings, and public transport, regardless of physical or financial capacities. Similarly, Good Food aims for access to sustainable food for all Brussels inhabitants in their neighbourhood[16]. The PRDD uses Henry Lefebvre's [1967] concept of the right to the city, illustrated in the plan as "a city's emancipatory force that offers a space and facilities open to all"[17]. In some cases, this approach of undifferentiated universal provision is further specified through minimum standards such as a green space within 400 m for every inhabitant[18], a local Good Food project within a 15-minute walk[19], or a minimum and sufficient level of accessibility in all parts of the territory[20].

### 3.3.2. The principle of reducing environmental inequalities

32 In other cases, plans explicitly aspire to reduce social and spatial inequalities or to reinforce equality. Unlike the universal provision approach, this perspective explicitly recognises Brussels' uneven social-ecological landscape. The PRDD, for example, commits to "strengthening equal access to basic essentials by ensuring equitable access to water, energy, open spaces and high-quality food"[21], while the Shifting Economy refers more generally to "an economic model that should not be a source of inequalities"[22]. The use of the term "dualisation"[23] similarly illustrates the situation of a divided city, which policies aim to prevent.

33 This principle is operationalised by prioritising areas with the highest exposure to risks[24] or the greatest lack of amenities[25], or by prioritising vulnerable groups[26]. It also involves addressing environmental deprivation. The PACE and the PGE speak respectively of strengthening the fight against energy poverty[27] and water poverty[28]. Similarly, the LEM roadmap states that there should be a "focus on measures that have an impact on the problem of mobility poverty"[29].

### 3.3.3. The polluter-pays principle

34 Five of the plans refer to the "polluter-pays" principle, which postulates a form of proportionality between the responsibility for environmental harm and the costs of solutions. It is listed as one of the overarching principles of both the PACE[30] and the Plan Déchets[31],where it is defined as "the obligation of those responsible for pollution to bear the direct and indirect expenses incurred by the measures to prevent, reduce and repair the pollution they have caused". This principle can be operationalised through measures to ensure the "extended responsibility of producers", where producers are made responsible for the environmental impacts of the products they put on the market[32]. The same provision is also cited in Quiet.Brussels, where different measures to attenuate noise pollution would be paid for by those responsible for the noise in the first place[33], as well as in the PRDD[34].

35 The polluter-pays principle, however, does not consider the polluter's capacity to pay. This is why, notwithstanding its communicative potential, it might be problematic from a social perspective. In this respect, the PGE is a notable example of tempering the polluter-pays principle with measures to ensure that water remains socially accessible and to fight against water poverty[35].

### 3.3.4. Principles of proportionality and social progressivity

36 Finally, some plans make explicit reference to principles of proportionality between the benefits received or efforts required on the one hand, and socio-economic situation, on the other. This typically translates into higher benefits, supporting measures or derogations for people in a situation of disadvantage. Similar, but opposite, consideration to privileged social groups and the opportunity to require of them an effort that is proportional to their higher means does not seem to exist.

37 In some cases, this one-sidedness is implicit. On the margins of a section focused on socio-spatial transition and inequalities, the PRDD indicates that policies to reduce inequalities should be "supported in a more balanced way by all the beneficiaries of the Brussels economic engine"[36]. Another case can be found in the PGE, where emphasis is

put on the need to avoid allowing water management-related costs to represent a burden for only one section of the population and exempting another[37]. Furthermore, the Good Move plan proposes to put in place the tariffication of transport services, which reflects users' income level[38]. In other cases, it is explicitly stated that certain social groups benefit from specific attention in virtue of their socio-economic vulnerability. The LEM Roadmap and the Good Food Strategy refer to social inclusion and to those for whom the transition might be more difficult because of personal, economic or cultural circumstances. The Plan Déchets and the PRDD use the term "solidarity" in a similar sense.

## Conclusion

38 In this article, we have analysed how Brussels' environmental policy apprehends, makes sense and deals with different types of socio-environmental inequalities. Our examination found a diversified landscape, reflecting the variety of environmental issues covered by the plans and the contexts in which they were prepared and adopted.

39 References to different sorts of socio-environmental inequalities in spatial terms and within society and to ideals of justice are present in most plans, making use of various concepts and terminologies with different nuances and interpretations. At the same time, these references are rather dispersed, and an overall picture of socio-environmental inequalities, environmental poverty or privilege are absent, potentially preventing a comprehensive approach to these themes. Socio-environmental inequalities are clearly not the main entry point of environmental policy: relevant empirical evidence is barely reviewed, and there is little explanation of which inequalities matter and why they would matter in the context of a certain environmental policy. Moreover, a vague and superficial use of terms related to inequality and justice tends to weaken them and reduce their transformative charge.

40 When analysing the ambitions to address inequalities, we identified four normative ideals: universal provision, the reduction of environmental inequalities, the polluter-pays principle, and principles of proportionality and social progressivity. Taken together, they reflect a predominantly protective approach to social justice, emphasising access to environmental benefits, mitigation of harms and support for vulnerable groups. The plans prioritise safeguarding socio-economically disadvantaged populations through measures such as affordability and targeted support, but they rarely impose differentiated obligations on privileged groups. While themes such as a guaranteed minimum standard of environmental quality, social support for people in need, and the fight against forms of environmental deprivation seem to take root, others, such as a maximum ceiling of environmental degradation, increased obligations for more privileged groups, and the fight against overconsumption, are ostensibly left out. This creates an asymmetry where social justice is operationalised as a "leave no one behind" principle, focusing on minimum standards and compensatory actions, rather than as a more transformative framework that would actively redistribute environmental responsibilities. Brussels' approach to the just transition, in other words, remains limited to addressing some of the vulnerabilities of people in need, without defining – and thus dealing with – environmental inequality as a structural question mirroring and reproducing socio-economic disparities.

41 This article focused on the language of the plans, and on the explicit considerations put forward in official documents. Further research could add to this perspective by studying the meanings attributed to these texts by those who wrote and adopted them, and by exploring the intended and the actual impacts of these provisions. While the analysis of the texts is a first necessary step in shedding light on the ways in which environmental policy engages with the just transition, our societies evolve thanks to the ways in which this engagement is fulfilled.

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## NOTES

**1.** Justtransition.be.
**2.** In this respect, the Regional Plan for Mobility and the Regional Plan for Sustainable Development were borderline cases but were eventually included. For the latter, only the specific chapters on environmental themes were scrutinised. The urban cleanliness strategy "clean.brussels" is another borderline case, which was eventually excluded due to its operational orientation and thematic overlap with the Plan Déchets.
**3.** PRDD, pp. 16-17.
**4.** Plan Nature, p. 20.
**5.** LEM Roadmap, p.65.
**6.** Plan Nature, p.12.
**7.** LEM Roadmap, p. 9.
**8.** PACE, p. 170.
**9.** PACE, p. 14.
**10.** Ibid., p. 19.
**11.** Ibid., p.159.
**12.** Ibid., p.173.
**13.** LEM Roadmap, p. 90, Good Move, p. 43.
**14.** Plan Déchets, p. 29.
**15.** Shifting Economy, p. 149; Good Food, p. 20; PGE, p. 599.
**16.** Good Food, p. 21.
**17.** PRDD, p. 18.
**18.** Plan Nature, p. 5.
**19.** Good Food, p. 53.
**20.** PRDD, p. 155.
**21.** PRDD, p. 106.
**22.** Shifting Economy, p. 16.
**23.** PRDD, p. 19; Quiet Brussels, p. 19.
**24.** E.g., the rehabilitation or improvement of areas with high exposure to road traffic noise, Quiet Brussels, p. 32.
**25.** E.g., "Bringing nature back to the neighbourhoods where it lacks the most", Plan Nature, p. 15.
**26.** E.g. "Strengthening the protection of vulnerable groups, including professionals", PRRP, p. 20.
**27.** PACE, p. 169.
**28.** PGE, p. 590.
**29.** LEM Roadmap, p. 39.
**30.** PACE, p. 20.
**31.** Plan Déchets, p. 32.
**32.** Plan Déchets, p. 47.
**33.** Plan Quiet Brussels, p. 67.
**34.** PRDD, p. 116.
**35.** PGE, p. 417.
**36.** PRDD, p. 19.
**37.** PGE, p. 595.

**38.** Good Move, p. 43.

## ABSTRACTS

At a time when questions of environmental and social justice are increasingly invoked in public debate, this paper investigates how Brussels' environmental policy apprehends, makes sense of and deals with different types of environmental inequalities. Through the lens of the just transition, the analysis focused on the language used and the explicit ambitions of fourteen pluriannual plans and strategies of the Brussels-Capital Region, shedding light on a diversified landscape. References to different forms of social and spatial inequalities and principles of justice were observed across the plans, though dispersed and fragmented. Four different normative ideals were identified, namely: universal provision, egalitarianism, the polluter-pays, and social progressivity. A "leave no one behind" understanding of justice appears as a common thread. The findings suggest that Brussels' environmental policy might benefit from a more systematic engagement with the transformative potential of the just transition.

Alors que les questions de justice environnementale et sociale occupent une place de plus en plus importante dans les débats publics, cet article examine comment la politique environnementale de Bruxelles appréhende, interprète et traite les différents types d'inégalités environnementales. À travers le prisme de la transition juste, l'analyse axée sur la terminologie utilisée et sur les objectifs explicites de 14 plans et stratégies pluriannuels de la Région de Bruxelles-Capitale révèle un panorama diversifié. Des références à différentes formes d'inégalités sociales et spatiales ainsi qu'à divers principes de justice, quoique dispersées et fragmentaires, ont été relevées dans l'ensemble des plans. Les quatre idéaux normatifs suivants ont pu être recensés : le service universel, l'égalitarisme, le principe du « pollueur-payeur » et la progressivité sociale. Une conception de la justice fondée sur le principe consistant à « ne laisser personne de côté » apparaît comme un fil conducteur. Il ressort de cette étude que la politique environnementale de Bruxelles pourrait tirer profit d'une prise en compte plus systématique du potentiel de transformation qu'offre la transition juste.

Nu kwesties rond sociale en milieurechtvaardigheid steeds vaker aan bod komen in het publieke debat, onderzoekt dit artikel hoe het Brusselse milieubeleid verschillende soorten milieuongelijkheden benadert, interpreteert en aanpakt. Vanuit het perspectief van de rechtvaardige transitie werd in de analyse gefocust op het taalgebruik en de expliciete ambities in veertien meerjarenplannen en -strategieën van het Brussels Hoofdstedelijk Gewest. Daaruit komt een gevarieerd beeld naar voren. In de plannen wordt verwezen naar verschillende vormen van sociale en ruimtelijke ongelijkheden en naar rechtvaardigheidsbeginselen, zij het op een versnipperde en gefragmenteerde manier. Daarbij werden er vier normatieve idealen geïdentificeerd, namelijk universele toegang, egalitarisme, "de vervuiler betaalt" en sociale progressiviteit. Het principe dat rechtvaardigheid betekent dat "niemand achtergelaten wordt", loopt als een rode draad door de verschillende plannen. De bevindingen wijzen erop dat het Brusselse milieubeleid baat zou kunnen hebben bij meer systematische aandacht voor het transformatieve potentieel van de rechtvaardige transitie.

## INDEX

**Subjects:** 4. santé – qualité de vie – inégalités sociales
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