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JUST TRANSITION GREEN BRIDGE: TUNISIAN CASE STUDY

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Cover photo: A young man overlooks a landscape dotted with wind turbines, symbolizing renewable energy and a sustainable future, Tunisia. (c) Hichem kaouane / Shutterstock

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Introduction

Tunisia's increasing energy demand, depleting oil and gas reserves, limited access to foreign currency, and dependence on Algerian gas have significantly strained its energy sector and national budget (Council of Energy Sciences, 2023). Despite these challenges, the country's energy transition has remained largely stagnant over the past decade (World Bank, 2024). Recent shifts in national governance and geopolitical developments have created conditions that could accelerate the deployment of renewable energy (Al Bawsala, 2024). The rise in authoritarianism under President Saïed, following his July 25th coup, and its subsequent influence on the governance of the energy sector appear to have unblocked some long-standing barriers to renewable energy expansion. These political changes align with Europe's carbon neutrality goals for 2050 and its escalating energy crisis since 2022, which prompted the EU to prioritize "green" energy security and reduce its dependence on Russian gas (EC, 2022). This agenda includes importing renewable energy, particularly green hydrogen, from North Africa—positioning Tunisia as a potentially key player in this evolving landscape.

Against this backdrop, Tunisia has set ambitious goals for its energy transition, aiming to increase the share of renewables to 35 percent of its energy mix by 2030 (MoIME, 2023). Since 2021, an initial wave of concessions approved 500 MW of renewable energy projects (El Amine, 2023). This was followed by the launch of a second phase targeting the installation of 1,700 MW under the 2024–2027 concession scheme (Zawya, 2024). Within this framework, the Ministry of Industry Energy and Mines, in collaboration with international actors, envisions transforming Tunisia into a "green growth engine" (World Bank, 2024). The action plan to meet these targets is driven by large-scale, foreign, and private sector-led projects, as well as investments in green hydrogen initiatives intended primarily for export (MoIME, 2023).

While these developments have been presented as "win-win solutions," they have not been without contestation. Trade unions and Civil Society Organizations (CSOs) initially opposed and blocked this trajectory, citing concerns over job security and socio-economic impacts (Depluche and Poletti, 2021; Ben Rouine and Roche, 2022; Ben Ammar, 2022; Louati, 2022; El Amine, 2023). From strikes, sit-ins, and protests to the blockade of a solar farm project in Tataouine, resistance to large-scale, foreign-led renewable energy projects emerged over the years. In response, there has been an increasing call for alternative energy transition pathways that prioritize energy sovereignty and justice, democratic participation, and community ownership through decentralized solutions (Ben Ammar, 2022).

However, at this point, energy transition pathways remain confined to strategies, agreements, and Memorandums of Understanding with limited tangible outcomes. This gap

highlights the need for a critical assessment of potential trajectories, particularly from socio-economic and justice perspectives. In this context, key questions become pertinent: what does Just Transition mean in the Tunisian context? Who are the winners and losers of this transition? Who benefits and who is left behind? How will this transition be financed and who bears the costs? What role, if any, can CSOs play in shaping inclusive and equitable processes and outcomes? Lastly, can a just transition truly occur in the face of Tunisia's deepening erosion of democracy?

Report Objectives

This report focuses on Tunisia's energy transition in the power sector and its intersection with food, water, and land. It assesses this transition from a justice perspective, emphasizing the role of various actors and their power dynamics, with a focus on CSOs and their degree of participation in policymaking. Additionally, the report examines the influence of international donors, mainly EU projects, in shaping the course of this transition. It attempts to answer questions pertaining to different actors' perceptions and conceptions of just transition in the Tunisian context. This analysis is contextualized within the country's unique socio-political environment shaped by a historical dependence on fossil fuel consumption and imports, alongside a governance system that has become increasingly centralized and unstable, reflecting the country's broader struggles with democratic consolidation. Finally, this research provides actionable recommendations for designing a comprehensive and nationally owned just transition strategy by focusing on governance and accountability mechanisms and the meaningful inclusion of CSOs and marginalized communities in the decision-making process.

This study combines in-depth desk research and policy analysis, with key stakeholder interviews involving CSOs, government organizations, international donors, trade unions and academia, as well as insights from a roundtable discussion with various stakeholders. The report first entails an analysis of national and international policies, development plans and strategies impacting the Tunisian energy transition, with a focus on local and transnational EU policies. An emphasis is placed on green hydrogen and ELMED projects, as they constitute core aspects of the EU's "green" interventions in Tunisia and North Africa. The report further explores patterns of CSO engagement in the Tunisian energy landscape. Expert interviews are elicited to gauge perceptions of different actors regarding current developments in the energy sector, the extent of CSO involvement, the role of EU projects, and the winners and losers of this transition. The findings are then analyzed through a just transition lens, unpacking its different dimensions and interpretations by actors, and presenting place-based and local understandings of the concept. Comparisons with Tunisia's hydrocarbon sector are drawn to extract lessons learned and propose actionable and transferable recommendations. Finally, this

study provides actionable recommendations for grassroots organizations, government bodies, and donors to improve efforts for fostering an inclusive, nationally owned, and truly just transition for Tunisia.

Just Transition Conceptions

The term Just Transition (JT) was coined in the late 1970s by trade unions in petrochemical industries in North America, to safeguard jobs and workers' rights in response to stricter environmental regulations (Hirsch et al., 2017). The concept expanded, with a second wave of narratives emerging from the environmental justice movement in the 1980s, calling for a transition away from polluting and extractive industries which disproportionately impacted marginalized communities (Mohai et al., 2009). This marked a shift from a worker-focused perspective to one that focuses on frontline and vulnerable communities in the context of sustainability (CJA, 2018). More recently, the climate justice movement positioned JT within the climate crisis, focusing on phasing out fossil fuels and transitioning to a low-carbon economy (UN, 2023).

JT has since evolved to encompass intersectional justice, addressing inequalities related to race, gender, and class while advocating for systemic change (Faber, 2018). Activist groups and Global South actors have pushed for radical demands, including reparations for historical injustices, equitable resource distribution, and the transfer of power to local communities (Just Transition Alliance n.d; Climate Justice Alliance, 2018). These demands contrast with the institutionalized JT discourse, shaped by the International Labour Organization (ILO) and international climate negotiations, which have primarily focused on labor rights, decent work, and social protection (ILO, 2015). JT gained further traction in global forums such as the Paris Agreement (2015) and COP declarations, yet recent negotiations at COP29 have exposed deep divisions between developed and developing nations over financing, technology transfer, and governance (CGIAR, 2024).

Just Transition remains an elusive concept, and the multiplicity of actors defining it and their patched and diverging approaches have rendered it contested and often co-opted (Alarcon et al, 2022). In the Global South, its application is particularly complex due to structural inequalities and historical injustices. In South Africa, Lenferna (2023) critiques the Just Energy Transition Partnership (JETP) as a market-driven model benefiting private and foreign investors while marginalizing local communities. Barnes (2022) highlights the paradox of seemingly unified calls for justice in South Africa's energy transition, where different actors project conflicting visions onto the same infrastructure. Similarly, Zhou and Brown (2024) critique knowledge hierarchies in JT discourses, arguing that universal justice standards imposed

by global frameworks often fail to address local, context-specific struggles in extractive economies. These tensions raise critical questions about JT's operationalization (Wilgosh et al., 2022). Can JT be prevented from being co-opted by incumbent actors? Whose definition of justice prevails when competing interests arise? How can JT frameworks balance inclusivity with context-specific needs? Who funds JT, and how does this shape nations' sovereignty over decision-making? Can the urgency of rapid decarbonization be reconciled with ensuring justice and avoiding further inequalities?

Since its inception, JT has faced co-optation. Fossil fuel companies initially framed it as a binary choice between jobs and climate action to weaken support for low-carbon solutions (Williams and Doyon, 2019). While this framing persists, today's dominant tensions reflect Global North-South asymmetries. Global South actors reframe JT through historical and structural lenses, linking it to imperialism, colonial extractivism, and economic dependency (Hickel, 2017). Scholars argue that North-South relations remain shaped by centuries of colonial resource extraction, leaving many Global South nations in states of underdevelopment and dependent development (Frank, 2023; Evans, 2018). The "paradox of abundance", in which resource-rich countries suffer from extraction-driven dispossession while wealth accumulates elsewhere, continues to define modern energy sectors (Harvey, 2017; Sultana, 2022). Large-scale renewable energy projects for export risk creating new "sacrifice zones", perpetuating exploitation in the name of sustainability (Alarcon et al., 2022).

In response, Global South actors are leveraging JT as a rhetorical axis to demand decolonial justice, reparations, and equitable financial mechanisms (Hizliok and Sheer, 2024). This includes calls for dismantling exploitative economic systems, promoting energy democracy, food sovereignty, and water justice, and advancing epistemic justice by centering Indigenous knowledge systems (Schwab and Combariza Diaz, 2023). These narratives oppose market-driven transitions, advocating instead for community-led solutions rooted in self-determination and sovereignty.

Despite these advancements in narratives, no concrete examples of Just Transition have been implemented in the Global South at a meaningful scale. While frameworks and advocacy offer compelling visions of what a just transition could achieve, they have not yet materialized in practice. As Naomi Novik notes, "justice is expensive. That is why there is so little of it, and it is reserved for those few with enough money and influence to afford it" (Sovacool et al., 2017). The following sections of this report will delve into the evolution of the energy transition in the Tunisian context, examining how the concept has been framed, contested, and operationalized. This exploration will include an analysis of Tunisia's socio-political and historical context, the role of local and international actors, and the challenges and opportunities associated with embedding justice into the country's energy transition.

Methodology

The findings of this report are derived from a combination of policy analysis and key stakeholder interviews with participants from civil society, academia, trade unions, government actors, media, and the European Union. These interviews explored different actors' definitions of just transition, identified its winners and losers, and examined the roles played by various stakeholders – particularly CSOs and the EU – in shaping this process. Conducted both online and in person, the interviews sought to capture diverse perceptions, narratives, and interactions among actors to inform a more inclusive dialogue on designing a just transition in Tunisia. Twenty-two interviews were conducted between the period of March and December 2024, including two field visits to the city of Tunis which took place in March and October 2024.

Participants were selected using a snowball technique based on the author's and the organization's networks in Tunisia. The study adopts a political economy perspective to examine JT, emphasizing the importance of situating the concept within Tunisia's unique socio-political and economic context. This approach ensures that global frameworks for just transition are critically assessed and tailored to local realities, acknowledging the historical and structural dynamics that shape energy governance in the country and the importance of place-based interpretations.

Additionally, the study included a roundtable discussion held in Tunis on 31 October 2024, during which preliminary

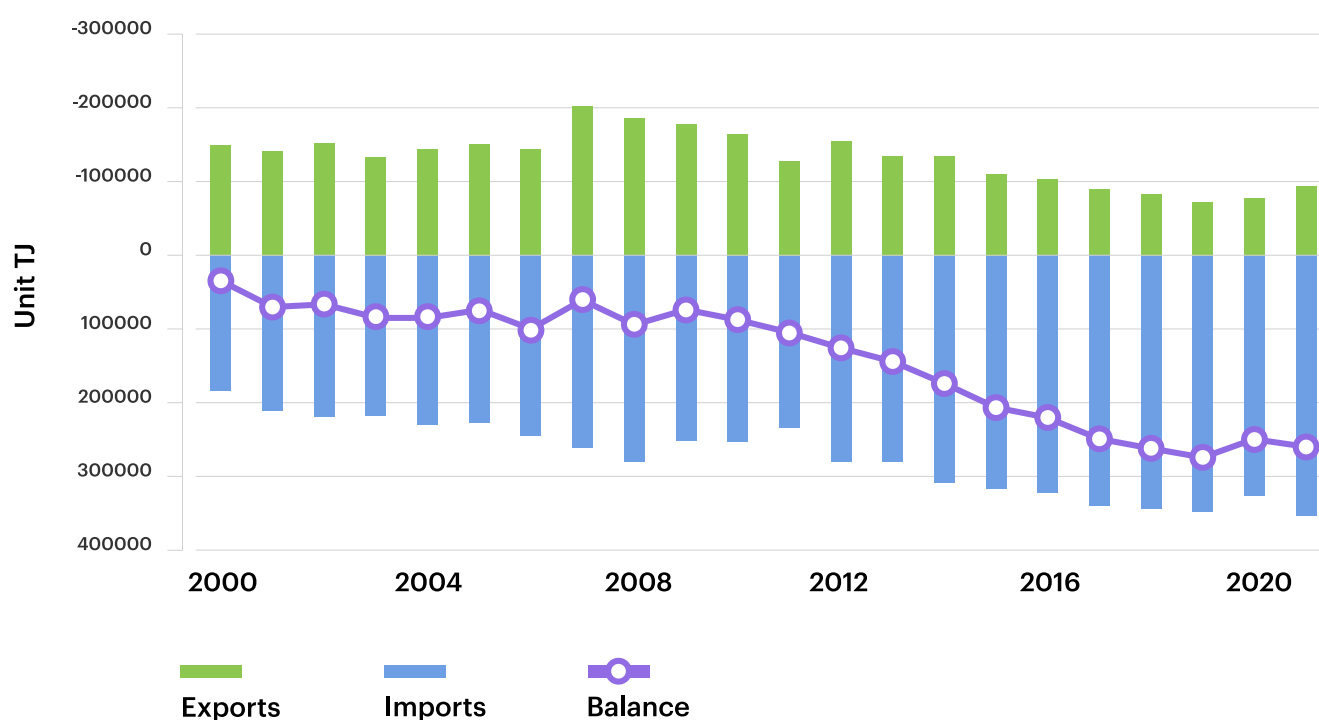
findings were shared. The event featured a critical discussion with a diverse group of stakeholders. This report incorporates observations, recommendations, and topics addressed during the event.

Tunisian Energy Landscape

Structural Overview

Multiple challenges plague the Tunisian energy sector. From resource scarcity to steadily declining oil and gas reserves, Tunisia is highly energy-dependent (World Bank, 2024). The country currently imports more than half of its energy demand from Algeria, in addition to the natural gas it receives as royalty on the Algerian Transmed gas pipeline crossing Tunisia to Italy (Oxford Business Group, 2017). Domestically, Tunisia has limited access to resource-processing technologies which hinders its ability to process its scarce raw materials. Unrefined petroleum is indeed exported for processing (Ben Ammar and Ammar, 2024), further exacerbating the country's trade balance deficit- see Figure 1. From January till August 2023, energy imports were responsible for 53.4 percent of Tunisia's trade deficit (World Bank, 2024). The energy sector has thus experienced a protracted structural crisis over the past decades, which has been intensified by an increasingly volatile energy market and the devaluation of the Tunisian dinar (Council of Energy Sciences, 2023).

Figure 1. Tunisia's Trade in Energy Adapted from IEA (2021)



Tunisia's structural challenges extend beyond energy, intersecting with vulnerabilities in the agriculture sector. Over the years, the country's dependence on agricultural imports deepened, exacerbated by the Russia-Ukraine conflict or war, as Ukraine was its primary wheat supplier (World Bank, 2022). A five-year drought has further devastated the agricultural sector, causing a sharp decline in wheat yields, destabilizing dairy production, and damaging olive crops. Combined with soaring inflation and worsening economic conditions, these factors have led to food shortages and increased reliance on cereal imports (FAO, 2024). These overlapping pressures complicate Tunisia's efforts toward self-sufficiency, sovereignty, and its potential energy transition. Indeed, the increasing competition for scarce water and arable land between agriculture and prospective renewable energy projects presents a significant challenge for the country, as integrated resource governance – essential for balancing competing priorities – has yet to be incorporated into policies and plans.

Adding to that, Tunisia's energy transition is hindered by important infrastructural hurdles. Despite achieving an

electrification rate of 99.8 percent in 2016 – among the highest across the continent – Tunisia's transmission grid remains poorly equipped to accommodate the additional RE capacity targets set by the government (STEG, 2023; Esroy and Terrapon-Pfaff, 2021). Substantial investments are required to account for the intermittency challenges of RE technologies, including grid upgrades for both expansion and flexibility, as well as investments in energy storage systems (Esroy and Terrapon-Pfaff, 2021). Currently, the grid is already struggling to meet peak demand, which has been increasing annually by 5 to 6 percent and is projected to maintain this growth rate (Cherif, 2023; World Bank, 2024). So far, investments in grid expansion for RE integration have been primarily financed by private entities through loans- see Table 1. This pattern of investment distribution, where public utilities accumulate loans and debt, reflects an ongoing dependency on core nations for financial resources, reinforcing global hierarchies and shifting the burden onto peripheral countries to repay loans with interest, ultimately diverting much-needed funds away from essential development and sustainable energy investments.

Table 1. Investment in RE-related Grid Infrastructure in Tunisia (compiled by the author)

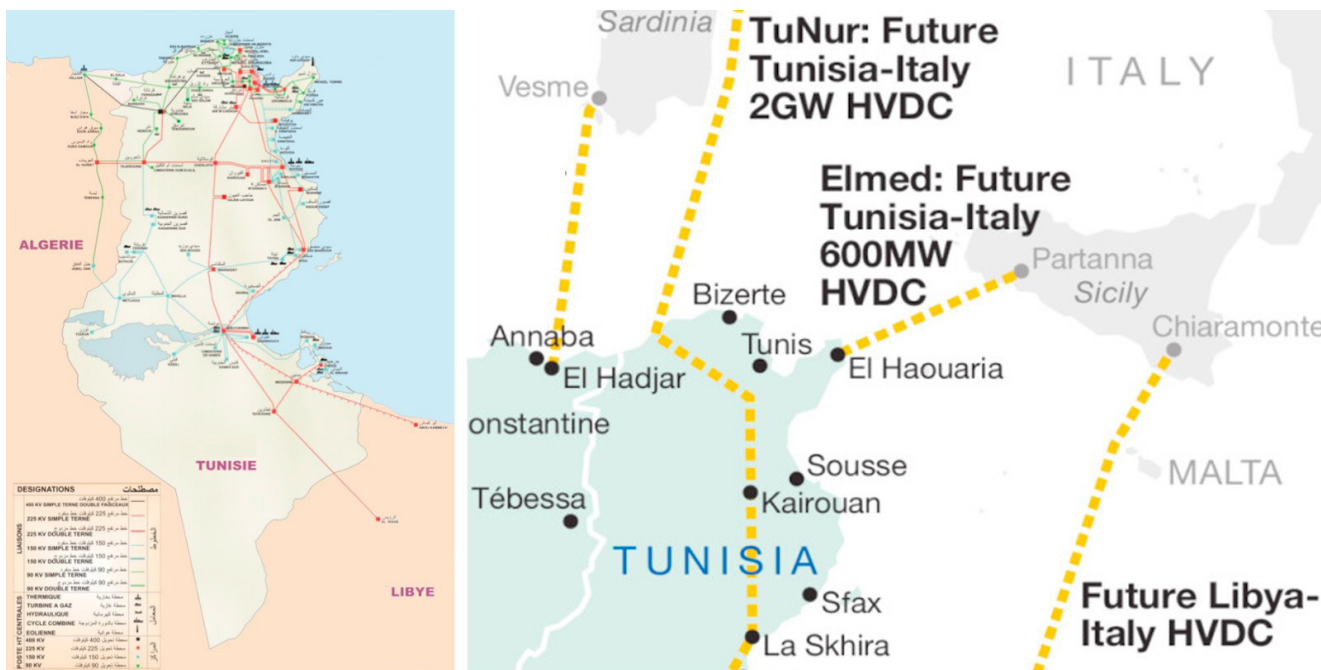
Project	Description	Financing Entity	Form of Financing
Project to Develop and Equip the Power Transmission Grid (PAERTE)	Project aimed to strengthen Tunisia's transmission network in Bizerte, Ben Arous, Sousse, Sfax, and Gabes governorates to improve electricity supply quality and integrate renewable energy.	African Development Bank (AfDB), Africa Global Trade Finance (AGTF), STEG and Islamic Development Bank	€290 million (AfDB loan €108 million, AGTF loan €30 million, IsDB loan €121 million, and co-financing by STEG €31 million)
Smart Grid Project	Project aimed to improve infrastructure assets and roll out smart grids to balance power supply with demand in a pilot region covering Sfax city and Kerkennah, Sousse city and Sidi Bouzid, and Le Kram and Beja	Agence Française de Développement (AFD)	€120 million
Energy Sector Improvement Project (ESIP)	Construction of 384 km of high-voltage transmission lines. The goal is to integrate renewable energy from southern Tunisia with high-demand areas in the north, enhance system reliability, and support regional energy connectivity.	World Bank	\$131 million
Tunisia Grid Reinforcement- part of planned ELMED project	This project finances domestic grid reinforcements to connect the HVDC interconnector to Tunisia's grid. It includes a new substation, two high-voltage transmission lines, and upgrades to eliminate bottlenecks, enhancing grid stability and enabling the integration of more RE	World Bank and Green Climate Fund (GCF)	€110 million loan (€91.2 from World Bank and €18.8 million from GCF)

On the other hand, transnational interconnectors with neighboring countries – such as Libya, Algeria, or Europe (via the proposed ELMED and TuNur projects) – have been proposed to enhance RE exchange (IRENA, 2021; see Figure 2). By leveraging cross-border interconnectors and regional cooperation to manage RE surpluses and offset deficiencies, Tunisia could achieve higher levels of energy security through increased grid flexibility and higher RE integration (GIZ, 2013). However, these solutions are complicated by stark differences in national contexts and nuanced underlying conditions (Ben Ammar, 2024).

Variations in energy security, local electricity markets, grid readiness and robustness, technical capacities, and financial resources across these countries may place Tunisia in a position of deepened energy dependency (Ben Ammar, 2024). Europe's highly developed integrated grids and interconnectors, alongside its market, technology, and legal dominance, contrast sharply with Tunisia's energy insecurity and structural challenges. Throughout 2021-2022, Europe's energy price hikes highlighted the volatility of its energy markets and the significant role fossil fuels, particularly natural gas, continue to play in setting wholesale electricity

prices (Vives, 2021; Zakeri et al., 2023). An analysis of 2021 data by Zakeri et al. (2023) showed that fossil fuels set electricity prices 58 percent of the time across Europe, despite accounting for only 34 percent of electricity production. Projections by Gasparella et al. (2023) suggest that by 2030, even if gas generation plants reduce their share of electricity production to 11 percent, they will still determine prices 56 percent of the time. This persistent “merit order” effect – where the most expensive power source needed to meet demand sets the price (Kolb et al., 2020) – will remain significant even with increasing RE shares. Given the complexity of these dynamics, implications on local energy prices in Tunisia must be examined through a justice lens to fully assess the impacts of proposed projects. Furthermore, such collaborations require extensive coordination on technical and regulatory issues, including developing and harmonizing national electricity markets, managing powerplant discharge, and ensuring optimal operation of transmission grid capacities (Westphal et al., 2022). This imbalance could reduce Tunisia’s negotiating power, potentially increasing its reliance on energy imports and external financing while also making it more vulnerable to external pressures and challenges in asserting its energy sovereignty.

Figure 2. Existing and planned interconnectors in Tunisia between Algeria and Libya (left) through one 90 kV, two 150 kV, one 225 kV and one 400 kV lines to Algeria, and to Libya via two 225 kV lines. Two new 400 kV lines are under construction with both Algeria and Libya; and Italy (right) with two planned High Voltage Direct Current (HVDC) lines through ELMED and TuNur projects (adapted from GIZ, 2013 and African Energy, 2024)



These challenges align with broader trends faced by many countries in the Global South in their energy transition pathways, often trapping them in cycles of dependency on resources, finance and technology, and perpetuating trade deficits and market dominance of global powers. However, Tunisia's situation is further complicated by its unique socio-political landscape, characterized by an unstable political environment, a regression towards authoritarianism, the absence of a national dialogue in the energy sector, and limited CSO engagement in energy projects and strategies (El Amine, 2024b). As one participant explained "After the 25th of July everything changed [...] we are blocked because there is no dialogue. No possible discussions between the parliament, the president and the UGTT, the main actors and decision-makers. So, this blockade of dialogue means that there is no projection of solutions, no vision, nothing to discuss apart from the fact that the dialogue doesn't exist".

Actors, Governance and Regulatory Framework

There is a diverse range of stakeholders influencing the energy sector in Tunisia, but the ones mentioned in this section are not the only actors in this complex landscape. The structure of the sector is predominantly centralized, with the Ministry of Industry, Mining, and Energy (MoIME) serving as the key regulatory body overseeing its operations. The state-owned National Utility for Electricity and Gas (STEG) is at the core of these operations, holding a monopoly over the transmission and distribution of electricity, including the management and implementation of RE projects (IRENA, 2021). STEG is also responsible for 83.5 percent of the country's electricity generation, with the remaining supplied by Carthage Power, an Independent Power Producer (IPP) (United States Department of Commerce, 2022). The MoIME also supervises the National Agency for Energy Management (ANME), which leads research initiatives and implements government policies related to RE and energy efficiency. ANME advances Tunisia's energy transition goals by fostering innovations and aligning with sustainability targets (IRENA, 2021). Together, these actors make up the central pillars of the sector, around which important local and foreign developments have shaped their interactions.

Privatization and Liberalization

STEG was established in 1962 as part of an economic plan to nationalize all electricity production and distribution facilities (Ben Ammar, 2022). Its success in expanding electrification across the country earned it recognition as a public utility that provided universal, affordable, and accessible services (Cecelski and Ounalli, 2006). However, since the 1990s, foreign private sector actors have increasingly pushed for the sector's privatization. This began with the introduction of an IPP, Carthage Power, as STEG succumbed to external

pressures to meet growing national energy demands (Bennasar and Verdeil, 2014). Since then, neoliberal efforts to integrate market-based principles into the energy sector have become more prominent, focusing on reducing subsidies and increasing privatization. While STEG initially resisted these changes, its financial struggles – including rising fuel prices, non-payment of bills, frozen energy subsidies, a growing energy deficit, and the devaluation of the dinar – ultimately led to the acceptance of private sector participation under IMF-imposed structural reforms (Louati, 2022).

After decades of STEG's resistance and continued monopoly, efforts mediated by a German-Tunisian partnership introduced private actors in the production of RE in 2015 (GIZ, 2015). This transition materialized through the launch of the Tunisian Solar Plan (TSP) setting a target of 35 percent RE by 2030 (see Figure 3) and was facilitated by the German development agency Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) (Verdeil, 2019). The plan aimed to liberalize the local energy market and enable private sector participation in RE production for self-consumption, local demand, and exports. It also sought to promote the export of German expertise and technology for RE deployment while opening the sector to foreign private-sector financing (Louati, 2022).

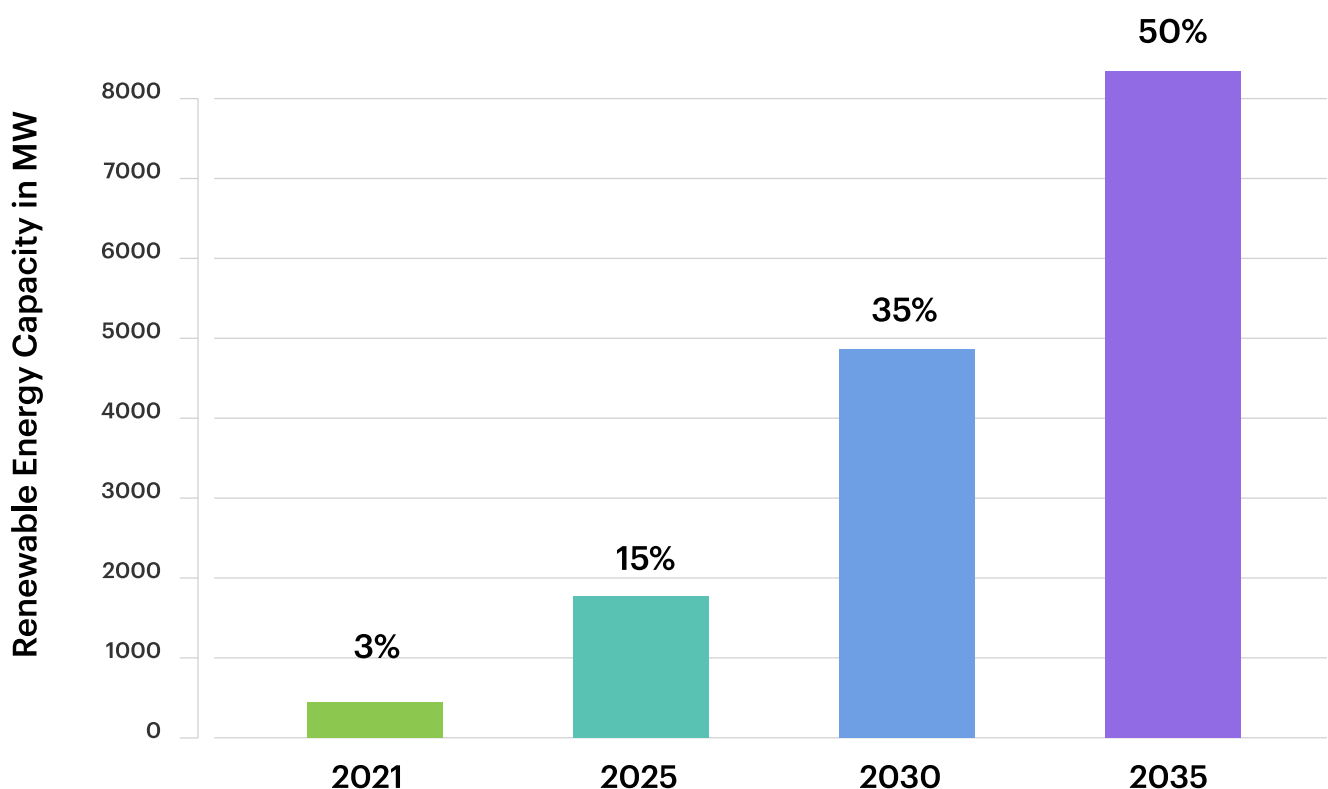
While the mainstream narrative described these developments as attempts to green the economy through decarbonization, job creation and local development, many criticized this approach, arguing that reforms facilitated only foreign involvement in the sector rather than local actors and focused on export-oriented policies (Ben Rouine and Roche, 2022). In response to these developments, local actors have had differing and diverging approaches and alignments. Overall, the MoIME, the ANME aligned with the green transition narrative. However, opposition within STEG, primarily from its trade union, the General Federation for Oil and Gas (FGEG), persisted until recently, largely due to concerns about the risks private sector involvement posed to workers' job security. This mainly took the form of strikes and blocking the operationalization of PPP RE projects, the latest of which was the Tataouine solar plant (Ben Rouine and Roche, 2022). Following pressures from the president, the FGEG was eventually forced to end its blockade of PPPs (Sabry, 2024).

Building on the TSP, the Government of Tunisia embarked on a more ambitious pathway with higher targets after launching its Horizon 2035 Energy Strategy in February 2023 – see Figure 3 (MoIME, 2023). But scaling up RE targets to 50 percent of the energy mix over the next 10 years will require accelerated and coordinated efforts on the financing, legal, administrative, and technical fronts. So far, the impacts of the sectoral reforms resulted in prioritizing foreign interests over national priorities and development challenges. For instance, reforms aimed at streamlining administrative processes, such as the

establishment of management councils and the Investment Climate Improvement Law, failed to account for their impact on the agricultural sector and the lack of protection of communal lands – see Figure 4 (WGED, 2024). This oversight is part of a recurring pattern, as seen in the passing of Decree 68/2022, which allows RE projects to be developed on agricultural land if approved by the Technical Committee for Electricity Production. It is worth mentioning that the EU

tightly regulates the deployment of RE on agricultural land, to ensure it does not compromise food sovereignty and security. Additionally, with the shift back to authoritarianism in 2021, key decisions – such as granting concessions to foreign companies – bypassed democratic processes and were enacted through presidential decrees raising further concerns about transparency and inclusivity (WGED, 2024).

Figure 3. Renewable Energy Capacity and Targets set by the Horizon 2035 Energy Strategy (MoIME, 2023)



But what does liberalizing the market mean for Tunisia's energy sector? Since 2014, the government has implemented structural reforms, including energy subsidy cuts, tariff adjustments, and restructuring plans for STEG, as part of commitments tied to securing IMF loans (Louati, 2022). These reforms, which aimed to address the fiscal deficit incurred by energy subsidies and align energy prices with production costs, have placed immense financial strain on STEG. Without debt relief or access to alternative sources of foreign currency, STEG has been forced to absorb significant losses, increasing its reliance on foreign loans (Ben Ammar, 2022). Tariff adjustments enacted in 2022, which raised electricity and gas prices by 16 and 22 percent respectively (World Bank, 2023), have further strained affordability for Tunisian consumers.

In 2023, the EU signed an MoU with the Government of Tunisia, as showcased in Figure 4. A central component of this MoU is the ELMED project, the first infrastructure directly connecting Europe to Africa. This 200 km bi-directional cable will link Sicily to Mlaabi in Tunisia, enabling 600 MW of electricity exchange of RE by 2028 (ELMED, 2023). Investors claim that from 2030 onward, Tunisia is expected to benefit from lower RE import costs from Italy due to surplus production, while exporting RE to Europe via ELMED will boost foreign currency reserves and trade balance (EBRD, 2023). Presented as a cornerstone of Tunisia's energy transition, ELMED introduces significant complexities with implications for Tunisia's JT pathways.

The project's export-oriented focus risks prioritizing international market needs over local consumption, potentially resulting in higher electricity prices for Tunisian consumers, especially if cost-reflective tariffs are fully implemented to attract private investment. Price volatility could also increase as Tunisia's energy market integrates with Italy and broader European markets. Indeed, in October 2023, Tunisia signed an MoU with EBRD, which will be focused on a market integration program, as well as the establishment of an independent regulatory authority (TERA) that will facilitate the commercialization of electricity flows across the interconnection (EBRD, 2023). With ELMED envisioning a RE capacity of 130 GW for Italy and only 4 GW for Tunisia by 2030, the project seems to prioritize Italy's RE production, to channel Italy's RE surpluses to Tunisia to support the former's grid stability. This dynamic raises concerns about replacing Tunisia's current dependence on Algerian gas with a new reliance on European markets, potentially undermining

the country's energy sovereignty. This shift is especially concerning from an affordability perspective, as potential energy tariff adjustments combined with the continued influence of fossil fuels on electricity pricing in European markets, which could lead to higher costs for consumers.

Moreover, ELMED highlights Tunisia's dependence on foreign financing and expertise, raising concerns about its ability to control its own energy policies (Ben Ammar, 2024). Balancing the interests of private investors, public utilities like STEG, and the government will require strong oversight to avoid conflicts of interest. As mentioned by Ben Ammar (2024), TERA's independence and effectiveness will be crucial in ensuring the project aligns with Tunisia's national priorities, particularly equitable energy access and affordability for its population.

Figure 4. National legal instruments influencing the Tunisian Energy sector
(compiled by author from different sources)



Green Hydrogen for Export

As shown in Figure 4, the MoIME⁷ launched its green hydrogen strategy following its MoU with the German government and GIZ lobbying. The plan targets 8.3 million tonnes of renewable hydrogen production by 2050, with 6 million tonnes allocated for export to Europe, necessitating around 100 GW of RE capacity. By 2030, over 94% of Tunisia's hydrogen output is expected to be exported, with local consumption projected to remain limited to 23% by 2050 (MoIME and GIZ, 2023). The plan envisions a green hydrogen “valley” in the South, beginning with a pilot project in Gabes for green ammonia production by 2025. Desalination will support H₂ production, with demand for desalinated water expected to rise significantly, from 9.6 million cubic meters per year by 2030 to 248 million by 2050.

However, desalination is typically highly energy-intensive in general, requiring large lands for RE installations, and generates large volumes of brines that pose substantial environmental concerns (Depluech, 2022). In highly water-scarce and energy-insecure Tunisia, the exploitation of local natural resources solely for export purposes has been considered by many as a form of colonial accumulation by dispossession (Ben Ammar and Ammar, 2024). Both land and water requirements needed for the 100 GW of RE capacity by 2050 will be exorbitant. This will drive resource competition in the South of Tunisia, which is rich in agricultural and grazing lands, creating pressure on the already strained water and agriculture sectors. The rollout of green hydrogen will also require substantial capital investment in infrastructure, including electrolyzer capacity and pipelines, deepening Tunisia's debt and increasing reliance on development financial institutions and foreign capital. The infrastructure required for green hydrogen, including electrolyzers and pipelines, will demand significant foreign capital, deepening Tunisia's debt and dependency on external financiers. With projects concentrated in the underdeveloped South, socio-economic benefits remain uncertain. Infrastructure aimed at export markets typically neglects local development, leaving essential services such as roads, schools, and healthcare underfunded while providing jobs that are short-term, low-skilled, or inaccessible to the local workforce.

The Horizon 2035 and Green Hydrogen strategies incorporate a Just Transition framework as a fundamental pillar of Tunisia's energy transition. These plans prioritize economic development through green industrialization, aiming to create over 19,000 by 2035, and up to 424,000 jobs by 2050 (MoIME and GIZ, 2023). Key components include retraining and upskilling workers for the green economy, enhancing basic skills through education to improve workforce adaptability,

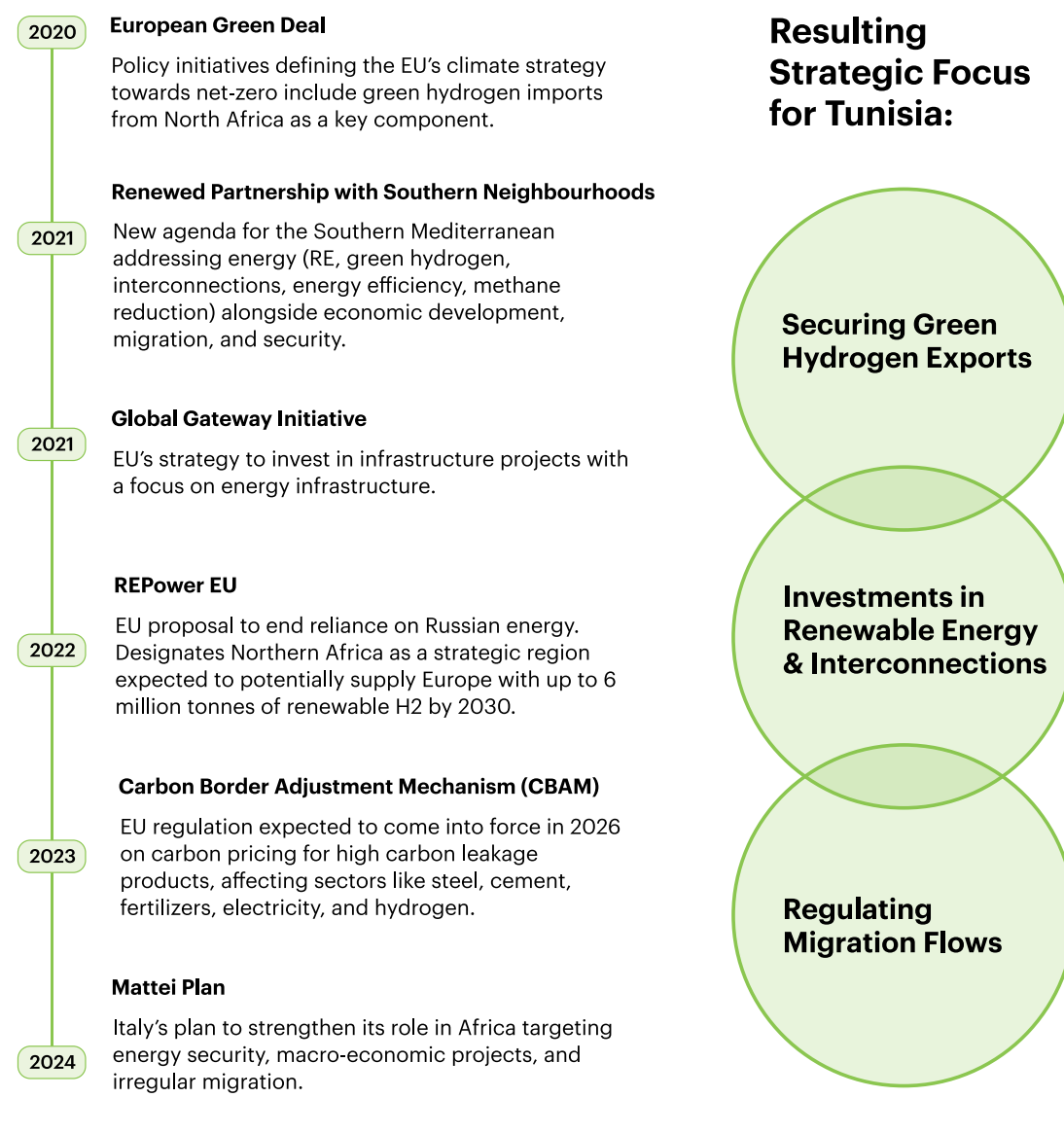
and ensuring the involvement of local communities, particularly in the southern regions. The strategies also emphasize gender equality, social inclusion, and combating energy poverty among vulnerable populations, with CSO and community engagement highlighted as critical to achieving these goals.

Despite the overly ambitious claims of the plans, they neither offer a realistic path for implementation nor reflect the current realities on the ground. Many jobs tied to green hydrogen are construction-based, offering immediate but temporary employment without long-term benefits for local workers. Higher-skilled positions in engineering and management will likely go to foreign experts, further alienating local communities. Additionally, the inherent safety risks of hydrogen production, storage, and transportation demand specialized training and stringent protocols, adding complexity to the job creation narrative. These gaps reveal a disconnect between the ambitious goals of the strategy and the realities of Tunisia's socio-economic and environmental context.

EU Strategic Reorientation: Energy Security and Migration

In recent years the EU's strategic policies, regulations and plans have heavily influenced Tunisia's energy sector, shaping projects and policies critical for its energy transition and JT pathway. The series of MoUs signed between the Tunisian government and the EU, its development banks, and private European companies, highlight the growing strategic importance of energy in the EU's agenda. The first MoU, signed in June 2023, included €150 million in budget support – part of a larger €1 billion package, following nearly two years of suspended funding after Tunisia's return to authoritarianism (De La Feld, 2024a). While the partnership covered various priority areas, it became known as the “migrant deal”, also focusing on securing energy channels for the EU (De Leo, 2023). The agreement faced internal opposition within the European Commission, with the European Greens attempting to block it, citing violations of Article 21 of the Treaty on the EU, which mandates that external actions be guided by principles of democracy, rule of law, human rights, and fundamental freedoms (De La Feld, 2024b). Despite internal contestations, this agreement still went through, and in 2024, a new MoU dedicated specifically to energy was signed under this framework. These developments underscore a broader strategic shift within the EU, prioritizing energy security and migration control over broader good governance or just transition goals.

Figure 5. EU strategies and resulting infrastructure and RE projects in Tunisia



	ELMED Interconnection	South H Corridor	MedLink Project
Planned and Prospective Infrastructure Projects:	200 km bi-directional cable will link Sicily to Mlaabi in Tunisia for electricity exchange of up to 600 MW.	Spans 3,300 km of pipelines with several hundred MW of compression capacity, designed to transport hydrogen connecting North Africa to Italy, Austria, and Germany.	North-South energy corridor HVDC lines, connecting RE production in Tunisia to Italy.
Resulting Green and Renewable Energy Projects in Tunisia:	Up to 4 GW of RE by 2030 for local consumption and power exchange with Europe.	Production of over 8 million tonnes of green hydrogen by 2050 powered by 100 GW of RE.	10 GW of wind and solar energy capacity, along with battery storage sites in Tunisia and Algeria, with a target of exporting 28 terawatt-hours (TWh) of RE annually.

Figure 5 details how years of strategic reorientation in EU green policies have culminated in specific policies related to energy shaping Tunisia's sector, as well as other Southern Mediterranean and African countries. It highlights how these policies prioritize EU energy security and integration, often shaping projects to serve European markets while raising questions about their alignment with Tunisia's local development needs, resource sovereignty, and equitable transition goals.

Role of CSOs in the Energy Transition

Against this backdrop of politically high-level and strategic developments in the energy sector, CSOs' role in influencing policymaking has shifted and diminished. Historically, and specifically since the revolution, CSOs have shaped the country's energy landscape, providing critical oversight so that social and environmental concerns are reflected in energy-related policies. Shifting their focus from fossil fuel governance, CSOs have recently tackled the impacts of renewable energy projects on water, agriculture, land, and communities.

CSOs in Tunisia do not represent a homogeneous position vis-à-vis the transition. However, there has been a general contestation of large-scale renewable energy projects, particularly those which involve foreign private capital and threaten agricultural and communal lands (Louati, 2022). An alliance between trade unions and CSOs had emerged, unified in their resistance to privatization. This alliance was further strengthened by the establishment of the Working Group for Energy Democracy, created within the framework of trade unionism and incorporating CSO actors. However, under growing authoritarianism, pressures from the president forced the trade unions to end their blockade of public-private partnerships (PPPs), dissolving the alliance between CSOs and the FGEG (Sabry, 2024). This period also saw increased restrictions on CSOs, marked by a draft law tightening control over foreign funding and activities, allowing for dissolution without judicial oversight and further shrinking civic space (Sabry, 2024). In recent years CSOs have faced increasing inclusion from consultations on energy plans and projects (Depluche, 2022).

This section delves into the nuances and dynamics of CSO engagement in Tunisia's energy transition. The energy agenda has also created a polarization among civil society actors, particularly around the green hydrogen agenda, causing internal tensions and stalling meaningful debates and dialogues. Identified participants- mainly from CSOs, academia, and the media- were interviewed about their conception of just transition in Tunisia, the main challenges they have faced, and their degree of engagement by government and EU actors. Interviewees also included one government representative from MoIME and three EU representatives who explained their perception of the unfolding of the energy transition in Tunisia.

The sections below outline key themes identified in participants' interviews. These include conceptions of

Just Transition, the impact of renewable energy projects on vulnerable communities, trends in CSO engagement, governance challenges, EU-CSO relations, and proposed scales and alternatives for achieving a just transition. Key observations and recommendations from ARI's roundtable discussion were also incorporated in this analysis.

Just Transition Conceptions

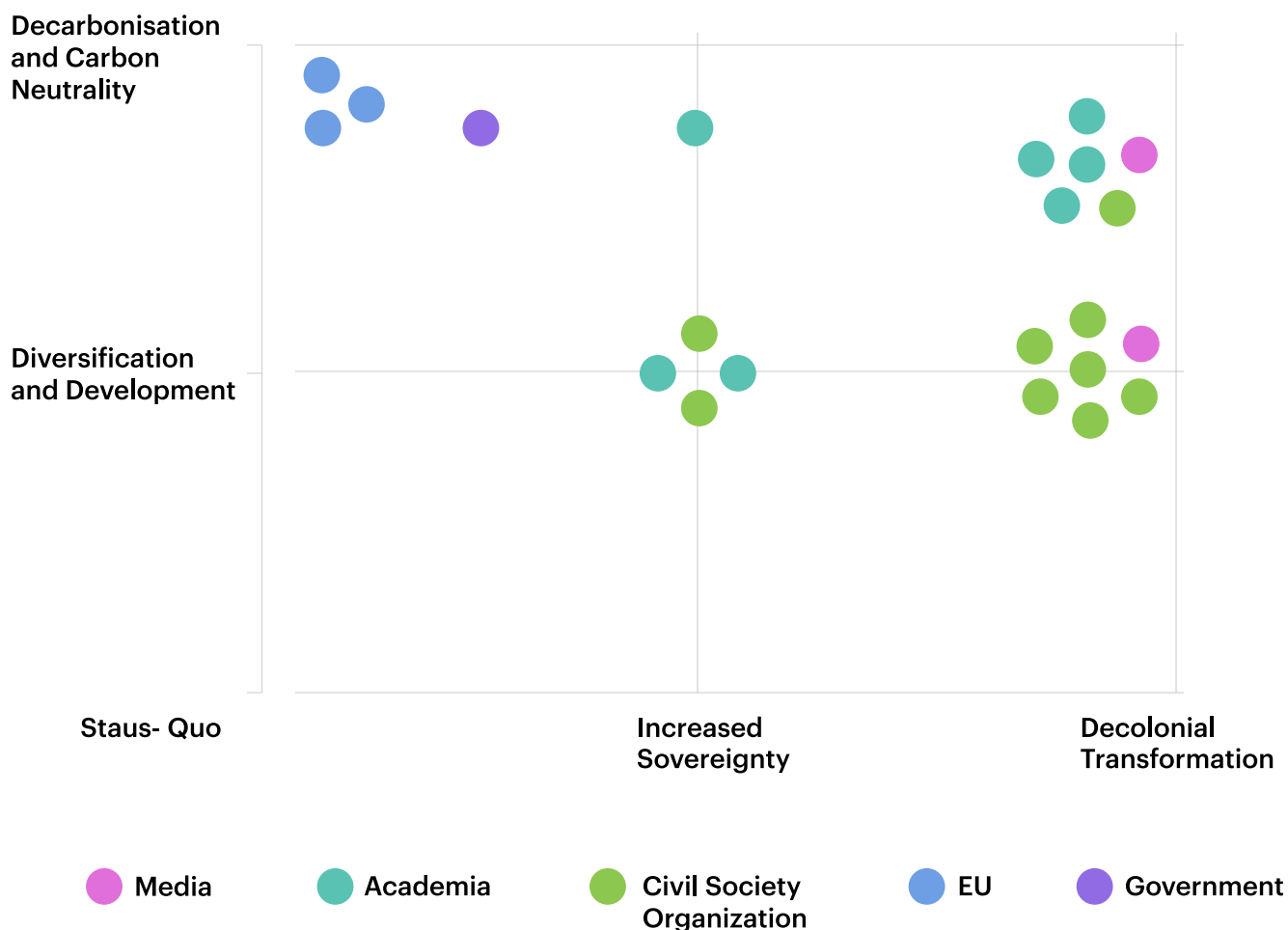
Despite the relative nascency of the Just Transition concept in the region, all participants demonstrated advanced knowledge of the topic, showcasing a deep understanding of its strategic relevance, challenges, and potential pathways for implementation. Naturally, given the concept's broad scope, interviewees emphasized different aspects of Just Transition, reflecting their institutional priorities and, to some extent, political perspectives.

Priorities and Outcomes

One unanimous theme that emerged across all interviews was the strong connection between JT and Tunisia's energy sovereignty and security, emphasizing the critical need for the transition to address the country's energy deficit. This theme was explored from two distinct perspectives. The first, shared by the majority of CSOs, academics, and media representatives, framed energy sovereignty as the ability of Tunisia and its communities to have full autonomy over energy decisions, including resisting externally imposed agendas which do not prioritize local needs. The second perspective, expressed by government and EU officials as well as a few academics and CSOs, took a more "balanced" approach, viewing energy sovereignty as a reduction of Tunisia's dependence on Algerian gas and the capacity to manage risks associated with proposed energy projects.

Around this axis, interviewees' conceptions of JT span across a spectrum as depicted in Figure 5. At one end lies a mainstream narrative that focuses on greening the economy and creating jobs within the status quo, while the other end reflects a transformative discourse that leverages JT as a tool for decolonial change, aiming to address and challenge structural inequalities exacerbated by climate change. As one CSO representative pointed out "There will be no energy transition coming from the Global South [...] because the global system does not allow us currently. Access to technology is impossible and access to finance is almost non-existent. To get out of this climate crisis there needs to be a space for dialogue. The proposition of just transition is a discussion lever between North and South".

Figure 6. Interviewee sample mapped across Just Transition Narratives



Across this spectrum, demands ranged from calls for good governance, transparency, and local development that leaves no one behind, to systemic solutions addressing historical injustices and structural dependencies. One participant emphasized the importance of tackling these inequalities at their roots: “We need to focus on pre-distribution, not redistribution, to address systemic inequities”, highlighting how any solution produced within existing systems is unlikely to be just. The decolonial discourse further critiqued prevailing modes of consumption and production, with interviewees emphasizing that JT pathways should prioritize producing energy only where it is needed and ensuring it directly benefits local communities rather than creating competition with other critical sectors like water and agriculture.

While many perspectives align strongly with one end of the spectrum or the other, several participants occupy a middle ground. This narrative emphasize diversification and increased energy security as transitional steps, combining a focus on development, good governance, and local benefits

with gradual decarbonization efforts. Participants in this category often supported energy projects that address Tunisia’s immediate economic needs while ensuring that long-term plans align with sustainability goals and community well-being.

Another point of contention among interviewed stakeholders revolved around the direction and priorities of the transition. While some participants emphasized the importance of aligning JT with low-carbon and sustainable pathways, others argued for prioritizing development first. As one CSO representative noted: “For us, it’s not just about addressing climate change—it’s about how we do our development. The West owes a historical debt to the Global South, and they must pay for the damage they’ve caused.” Figure 6 visually maps these diverging narratives of Just Transition along the axes of priorities (status quo vs. decolonial transformation) and outcomes (development vs. decarbonization and carbon neutrality).

Lastly, opinions diverged around the role of the private sector in the just energy transition. Some participants rejected its involvement, citing the profit-driven nature of private entities and the government's limited capacity to enforce accountability measures. Others recognized that the transition cannot proceed without private sector engagement, particularly local industries, due to the scarcity of available funding. One interviewee noted, "We can't exclude the private sector because they're profit-driven – that's just how they operate. The key is teaching them to align their business practices with broader just transition goals. Dialogue is essential to bridge the gap between differing needs and find common ground."

What is "Just" about the Just Transition?

On a more granular level, stakeholders delved into the complex and multi-faceted definition of justice, emphasizing how actors, context, power dynamics, and knowledge production shape its meaning. This topic was discussed at length at the roundtable discussion. One participant highlighted how the definition of Just Transition proposed by the ministry and supported by international actors in Tunisia reflects a neoliberal perspective, framing JT as an opportunity for Tunisians to participate in the renewable energy market and reap economic benefits. Another stakeholder reflected on the differing meanings of justice across contexts, contrasting the anti-extractivist and energy sovereignty-focused visions of CSOs in Latin America with those of CSOs in Europe, which emphasize community-led initiatives in partnership with the private sector to achieve a Just Transition.

While there is no blueprint nor unified definition for the meaning of justice, the discussions revealed how dominant narratives often prioritize economic and market-based approaches at the expense of local priorities and cultural contexts. One participant warned that failing to adopt a locally rooted understanding of justice could perpetuate the very challenges the EU seeks to address, such as irregular migration. Similar reflections were raised by interviewed stakeholders. One actor critiqued top-down approaches, stating, "we need to rethink justice not as something imposed from above, but something created by people and their environment." Another interviewee highlighted the cultural aspect of justice "it varies from one person to another, it's about clean air, access to jobs, people living in dignity and according to their values, this is justice."

These insights underscore how imported or externally defined concepts of justice risk ignoring the specific socio-political and economic realities of Tunisia. By prioritizing a justice framework grounded in local needs and values, the transition can address structural inequalities while ensuring that communities are not merely passive recipients but active participants in shaping their energy futures.

Challenges and Constraints

Despite stakeholders' advanced knowledge of JT, the interviewed sample may not reflect the broader national level of understanding of the topic. Interviewees mentioned that despite efforts taken up by CSO actors, national awareness of JT remains minimal. This highlights a significant challenge not only for local communities, who often lack exposure to the broader implications of JT, but also for CSOs themselves as they navigate the complexities of translating the concept into actionable and locally relevant frameworks. CSOs face the dual challenge of bridging the knowledge gap within communities while simultaneously building their own capacity and networks. Interviewees emphasized the need for stronger alliances between CSOs, labor unions, academia, and media actors to create cohesive narratives and amplify advocacy efforts.

Cross-cuttingly, stakeholders mentioned that the main barrier to JT in Tunisia is the absence of autonomy, both at the decision-making and financial levels. Tunisia's reliance on external financing – often tied to conditions dictated by international institutions and foreign investors – was seen as perpetuating a cycle of dependency that restricts the country's ability to prioritize local needs. This dependency not only forces Tunisia to align its energy transition goals with external agendas but also exacerbates structural inequalities by diverting resources away from critical domestic development needs. As one participant noted, "We are asked to transition, but on terms that deepen our debt and leave us without control over our resources or policies." This financial reliance translates into policy decisions that prioritize export-oriented renewable energy projects over local access, affordability, and sovereignty, effectively side-lining the foundational principles of JT. To address this, stakeholders argued, Tunisia must reclaim decision-making power by fostering alternative financing mechanisms and prioritizing partnerships that respect local agency and long-term equity.

Renewable Energy Projects and Vulnerable Communities

Energy Transition Projects

The most mentioned RE projects by participants were the ones linked to the green hydrogen agenda. Stakeholders expressed mixed reactions to these initiatives, with green hydrogen creating a significant rift among participants. Polarized opinions were noted, even within civil society and academia. On the one hand, "activist" CSOs and academics with more leftist ideologies depicted this agenda as fundamentally opposing the principles of Just Transition, highlighting its potential to perpetuate neo-colonial dynamics, exploit

Tunisia's resources, and undermine its sovereignty without addressing the existing challenges in the energy sector. While framing JT as a tool for energy sovereignty, one participant noted "We need to push Tunisia to meet its own needs. If that were the case, we'd be talking about completely different projects – not green hydrogen". On the other hand, government and EU officials insisted on the benefits of green hydrogen to meet Tunisia's energy deficits, claiming that the priority is for domestic electricity production and needs before export. They claimed that opportunities can be sown from export revenues, which can help Tunisia invest in infrastructure to address regional inequalities. In the absence of Tunisia's domestic infrastructure to process green hydrogen, its profitability is marketed in the hard currency it might generate from export.

Other stakeholders retained a more "balanced" perspective, viewing green hydrogen as an inevitable project that holds significant potential but must be approached with caution. One interviewee remarked, "Tunisia cannot afford to stay outside the green hydrogen race; we are too closely tied to Europe, and we need to engage, even if it's difficult. Green hydrogen is an immense opportunity, but without proper negotiation and consideration of local benefits, we risk repeating past mistakes". Despite this measured optimism, all CSOs and academics interviewed emphasized the critical need for safeguards to mitigate the multiple risks associated with green hydrogen. Perhaps the most pressing concern was the threat to Tunisia's already scarce water resources, given that green hydrogen production is water-intensive and could create competition with basic water needs. Participants also highlighted the environmental risks of brine discharge, particularly in the Gulf of Gabès, an area already heavily polluted by industrial activity. Another area of skepticism centered around the potential for job creation from green hydrogen projects. Participants questioned whether such projects would genuinely benefit the local economy, especially in the absence of technology transfer. In response to these concerns, one participant highlighted "The only aspect that could truly move things forward is ensuring that contracts signed with institutions include binding commitments—whether for environmental protections or for creating more jobs for Tunisians within these projects".

Vulnerable Communities

According to stakeholders, the energy transition in Tunisia will create clear winners and losers, with marginalized groups such as agro-pastoralists, farmers, and fishermen facing the greatest losses. Large-scale renewable energy projects threaten agro-pastoralists by encroaching on vital grazing corridors. As one participant noted, "The colonial narrative calls these lands 'unused,' but they are vital grazing areas for pastoralists." Farmers, already grappling with limited resources, will face additional challenges from competing uses of water due to the energy transition which threatens their livelihoods. Concerns over brine discharge

from desalination also threaten marine ecosystems, posing significant risks to fishermen who depend on sustainable fishing practices for their livelihoods.

Actors also identified local communities in Southern Tunisia, historically marginalized by oil and gas activities now face the prospect of losing their lands again, this time to renewable energy projects. Many communities view these projects as a repetition of failed development models, as one participant observed: "Southern Tunisia provides resources but receives no development in return. This is why resistance is growing." In this region, interviewees highlighted that the predominance of communal lands – owned collectively by tribes or ethnic communities – complicates the establishment of individual property rights. This complexity, combined with growing social resistance to large-scale renewable energy projects, particularly in Gabès, poses significant challenges to achieving social acceptability for such initiatives.

Stakeholders also highlighted the precarious position of STEG workers, whose job security is increasingly threatened by the expanding role of private sector participation and the implementation of associated reforms. This concern is particularly pronounced with the establishment of TERA, the independent electricity regulator, which is expected to significantly reduce STEG's influence in the sector. Finally, referring to gender and class struggle, participants further identified rural women as a key vulnerable group, which is currently overlooked by energy discussions. While the role of women is clear in water and agriculture, the impact of the energy transition on women in Tunisia is still understudied.

CSO Trends and Challenges

The role of CSOs in Tunisia's energy transition has become increasingly constrained, marked by a reduced influence and shrinking civic space, fragmentation, and to a certain extent limited technical knowledge of the complexity of renewable energy projects. Like in most civil society spheres, actors highlighted challenges in accessing funding, exacerbated by the country's severe economic crisis, and difficulties in sustaining community interest in environmental issues, which often take a back seat to more immediate socio-economic concerns.

All participants mentioned that the political situation is a main barrier threatening civil society's influence on the energy transition. Legislative measures restricting foreign funding and allowing for the dissolution of CSOs without judicial oversight have created an environment of uncertainty and fear, making it more difficult for them to operate independently. Activists reported a significant decrease in freedom of speech, with one stating "CSOs face repression for opposing privatization and exposing energy colonialism. Activists are being harassed and even arrested." This demonization of CSOs, wherein their motives and legitimacy are openly questioned, has hindered

their ability to engage with communities and relevant stakeholders. While CSOs continue to produce research and advocacy materials to inform communities about RE projects, their influence, power, and reach have diminished significantly. Some interviewees even highlighted that vulnerable groups now hesitate to collaborate with CSOs due to fears of state retaliation.

In recent years, participants noted an increasing fragmentation and diminished coordination within civil society, which currently lacks a unified narrative on the just energy transition. This division has hampered efforts to influence policymaking, particularly since CSOs' alliance with trade unions has weakened, leaving it increasingly isolated. An EU representative highlighted this issue noting that "There is a clear division between CSOs working on advocacy and those focused on service delivery. They often criticize each other, creating fragmentation in the sector". This lack of cohesion poses a critical challenge, especially as large-scale projects like those proposed under the green hydrogen agenda take shape. Without improved coordination, CSOs may be unable to provide the robust oversight and monitoring necessary to ensure these projects are implemented transparently and equitably.

Some interviewees highlighted that CSOs lack the technical expertise required to contribute to energy transition projects meaningfully, a criticism voiced primarily by EU representatives and proponents of the green hydrogen agenda. Others noted that while CSOs are beginning to engage in renewable energy discussions, their expertise has yet to reach the depth they achieved in addressing hydrocarbon-related issues, which benefited from years of experience and development. Limited access to information has further impeded progress, as CSOs often cannot obtain key documents such as project contracts or memorandums of understanding, restricting their ability to provide informed oversight. Overall, while they have demonstrated a solid grasp of the broader challenges posed by renewable energy transitions, capacity building is crucial in specific areas, particularly in understanding electricity markets and their implications for Tunisia's energy landscape.

Overall, CSOs in Tunisia have demonstrated notable strengths in advocacy, producing independent and alternative knowledge, and driving street mobilization efforts. Their strategies include collaboration with alternative media to create independent content, adopting a multi-sectoral approach that links food, water, and energy issues, and leading campaigns to inform citizens about their land rights to resist leasing land to private companies. Additionally, they have organized capacity-building camps at the local level centered around the climate justice narrative. CSOs also engage members of parliament and have actively lobbied with political representatives to advance just energy transition goals. However, challenges in communication persist, as

some interviewees noted the need to simplify messaging and adopt language that resonates more directly with local communities. The discourse, often centered on complex themes like colonialism, risks alienating certain groups and reducing the accessibility and relatability of CSO campaigns. Interviewees noted their need to align their communication with a narrative centered around energy affordability.

Governance

Governance challenges present significant obstacles to achieving a just energy transition in Tunisia. Participants cited increasingly centralized decision-making that bypasses parliamentary oversight and decreased engagement, a lack of transparency, accountability, and access to information as critical barriers.

Patterns of Engagement

The government's increasing centralization of decision-making has further side-lined civil society, limiting their access to information and narrowing their opportunities for legal and policy intervention. At the same time, most interviewees highlighted that neither the government nor the EU inclusively engaged with civil society actors. One participant remarked, "There's no real dialogue between the state and CSOs. The government pretends to listen while bulldozing ahead with its own agenda. [...] The government only consults CSOs that align with its agenda, excluding critical voices". Another participant emphasized that certain consultations took place without even involving state companies, reflecting a broader pattern of exclusion. This concern was repeatedly raised, with several actors noting that consultations primarily involved "liberal experts" or "allied CSOs," whose funding is often tied to EU institutions. A government official even acknowledged that the ministry's goal was to turn civil society into "ambassadors of green hydrogen," further reflecting this top-down approach to engagement. In such a context, procedural justice and transparent oversight are severely undermined, leaving critical and independent voices side-lined and unable to meaningfully challenge government narratives or hold decision-makers accountable.

Transparency and Contracts

Overall, participants highlighted significant governance challenges related to access to information on tenders, contracts, projects, and impact assessments of renewable energy initiatives. The lack of transparency in these areas, compounded by the absence of democratic processes in approving concessions and the failure to amend the renewable energy law to address these deficiencies, underscores a systemic governance gap. This lack of accountability has left civil society unable to meaningfully monitor or influence the renewable energy transition.

At the roundtable discussion, participants reflected on Tunisia's hydrocarbon experience, which offers critical lessons for renewable energy governance. The move toward open data and public access to hydrocarbon contracts represented a milestone in fostering transparency and accountability. These contracts were processed into machine-readable formats with searchable metadata, annotations summarizing key terms, and advanced functionality for clause comparisons – tools that empowered civil society to scrutinize agreements and advocate for more equitable governance. Yet, these advancements remain absent in the renewable energy sector, where opacity continues to dominate decision-making processes. Participants argued that replicating these principles of transparency and public oversight in renewable energy governance is crucial, particularly as large-scale projects like green hydrogen intersect with land, water, and community rights. One participant noted, “Renewable energy projects cannot repeat the same mistakes as hydrocarbons; without transparency, these projects risk becoming another form of resource exploitation.” Without institutionalizing open data practices and inclusive governance throughout the project lifecycle, Tunisia risks perpetuating the governance failures of its hydrocarbon past.

Impacts of Investment Treaties

Bilateral Investment Treaties (BITs) are agreements between two countries that establish the terms and conditions for private investments made by individuals and companies from one country in the other country. BITs have historically skewed negotiations in favor of foreign investors, significantly restricting Tunisia's capacity to renegotiate contracts in its national interest. These treaties include stabilization clauses that ‘freeze’ certain laws or regulations, to ensure new policies do not negatively affect an investor's operations or profits. This includes preventing the government from adapting contracts to evolving socio-economic or environmental priorities without incurring penalties. Additionally, Investor-State Dispute Settlement (ISDS) mechanisms embedded within BITs empower investors to sue governments for policy changes that might affect their profits, further disincentivizing essential climate and governance reforms (Lee and Delworth, 2024). Raised at the roundtable discussion, participants emphasized that such clauses represent a critical barrier to a just energy transition by prioritizing investor protections over national sovereignty. This dynamic risks replicating the governance pitfalls of Tunisia's hydrocarbon sector in the renewable energy space, where similar clauses could limit the country's ability to enforce environmental safeguards, address procedural injustices, or ensure equitable benefit-sharing with local communities.

Justice and Democracy

All participants highlighted the diminishing democratic space in Tunisia as a critical issue, particularly from an accountability perspective, as power has increasingly

become centralized under government control. The erosion of democratic mechanisms, such as parliamentary oversight and transparent decision-making, has weakened checks and balances, limiting opportunities for civil society to hold decision-makers accountable. However, some participants noted that justice is not exclusively tied to democracy. While democracy provides a framework for justice to flourish, it is not a guarantee; other factors, such as social and economic conditions, access to resources, and sovereignty, play a significant role. They argued that justice can flourish independently of formal democratic systems, particularly at smaller scales where communities have greater autonomy over resources, cultural practices, and economic activities.

EU-CSO relations

Since the beginning of the genocide in Gaza in October 2023, relations between EU institutions and civil society in Tunisia have grown increasingly strained. Many actors have distanced themselves from EU funding, citing dissatisfaction with the political stance taken by the continent. This shift was framed as a response to perceived double standards on justice and human rights, principles the EU often advocates but is seen as failing to uphold in this context. Consequently, some participants expressed a reluctance to engage with EU representatives, with one stating, “I prefer focusing on internal stakeholders rather than external entities like the EU. We need to address our local challenges first”.

The lack of transparency surrounding agreements and the perception of an externally imposed agenda further deepened tensions. This criticism was particularly directed at GIZ, which is viewed as the primary entity driving the green hydrogen agenda in Tunisia. Activists held multiple protests targeting GIZ, accusing it of promoting “green colonialism” and prioritizing European interests over local needs. As one interviewee remarked, “GIZ is the main provider of the energy strategy in Tunisia. They are doing everything, with the ministry's role reduced to implementing their recommendations. The EU's focus is clear – securing energy supply for Europe through export projects, with little regard for Tunisia's energy needs”. These dynamics further complicate the already fragmented landscape surrounding the energy transition, creating additional barriers to fostering meaningful dialogue and collaboration among all actors.

While EU actors emphasized their role in supporting Tunisia to achieve a fair and sustainable energy transition, there was a shared acknowledgment that these projects first serve European objectives. As one EU representative observed, “It's not accurate to say EU projects are purely extractive, but it's true that their primary drivers are European targets like the Green Deal.” The political nature of these agreements was also criticized, with another representative noting that memoranda of understanding were not participatory, as they primarily involved redesigning older cooperation programs.

These developments were attributed to shifting political dynamics within the European Commission, including the increasing influence of far-right parties. However, it was also noted that the Commission's foundational principles of democracy and rule of law could still offer a framework to address these imbalances and ensure greater inclusivity and transparency in future agreements.

Some participants stressed the importance of Tunisia developing a strategy to balance its interests with Europe's energy security needs, while others argued that such negotiations reflect structural inequalities, where Tunisia's position as a resource provider limits its leverage. These dynamics underline the complex interplay between partnership and dependency, challenging the framing of these projects as mutually beneficial.

Scale and Alternatives

Participants identified various scales of interventions necessary for operationalizing just transition measures. Regional initiatives across North Africa, grounded in shared colonial histories and imposed extractive models, were seen as crucial for fostering lessons learned and building coalitions of actors. This regional focus could facilitate collaborations among countries with similar governance structures and energy mixes, creating a stronger collective framework for addressing just transition challenges.

Others emphasized the importance of focusing on local and bio-regional scales – areas where communities share cultural, economic, and ecological specificities that transcend administrative borders. As one participant explained, regions like Cape Bon, the Kroumirie Mountains, and the oases of the South embody ecosystems where residents have cultivated shared socio-economic activities, cultural practices, and relationships with natural resources over generations. By grounding just transition initiatives in these bio-regional identities, there is potential to secure justice through strong social contracts rooted in local customs and ecological stewardship. At these smaller scales, just transition represents not just an energy shift but a broader reimagining of livelihoods and governance systems that respect the socio-cultural fabric of communities.

The common demand from CSOs around alternatives centered around decentralized community-led energy systems that meet local needs and empower communities. "Our ancestors knew how to manage commons like water and land sustainably. We need to revive these practices. [...] The further we drift from our traditional practices, the more vulnerable we become to collapse." CSOs have consistently advocated for such solutions throughout the years, yet policy and financial support remain absent. When questioned about financing opportunities for cooperatives, EU officials expressed skepticism, arguing that these models lack

scalability to meet national energy demands. This highlights the ongoing tension between grassroots alternatives and the larger systemic pressures driving centralized, large-scale energy solutions.

Recommendations and Conclusion

In conclusion, Tunisia's energy transition is unfolding within a complex web of global pressures, national constraints, and local realities. The current trajectory of the transition which aims to address the country's energy deficit by positioning it within global green energy markets through electricity exchange and green hydrogen exports to Europe risks being met by significant social resistance while exacerbating local inequalities. The "Just Transition" vision proposed by the government, and supported by international actors, has so far failed to address these challenges, overpromising job creation, excluding critical civil society voices, and neglecting safeguards to protect local resources and ensure sovereignty. This approach risks reproducing the injustices of the past, where resource export revenues – whether from mining or fossil fuels – failed to translate into local development, instead benefiting elites and foreign private companies. Such a pathway is likely to face the same opposition from communities that hydrocarbon projects once encountered.

A truly just transition in Tunisia necessitates a fundamental shift in priorities and mechanisms – centered on local knowledge, the protection of communal resources, and the empowerment of civil society as a critical oversight actor. This requires creating inclusive platforms for genuine dialogue, where marginalized communities, trade unions, and CSOs can actively shape policies and projects. Strengthening the role of civil society is essential, not only to enhance accountability but also to ensure that the transition is equitable and rooted in the socio-economic realities of Tunisia. The following targeted recommendations aim to guide CSOs towards achieving this vision:

- **Democratizing Knowledge:** Establish a phased approach to ensure open access to technical knowledge on renewable energy projects, starting with an audit of existing information gaps. To enhance accessibility, create a digital open-access platform where communities can find simplified explanations of technical terms, project objectives, and their potential impacts. Include lessons learned and transferable knowledge from the hydrocarbon experience.
- **Inclusion and Empowerment of Vulnerable Groups:** Advocate for direct investments in alternative livelihood sectors in regions targeted for renewable energy projects,

such as agro-tourism or small-scale manufacturing, to offset potential disruptions to traditional ways of life. Establish platforms to ensure communities have access to detailed maps of proposed renewable energy projects, comprehensive land-use plans, and assessments of social and environmental impacts. Advocate for participatory land mapping processes that protect land rights, particularly for communal and customary landowners, and ensure that affected groups are included in decision-making. These platforms should also incorporate grievance mechanisms and capacity-building programs to enable communities to engage effectively in consultations and develop skills for alternative livelihoods.

- Integrate Pastoralism into Renewable Energy Projects: Develop guidelines for co-locating renewable energy projects, such as wind farms, with existing pastoral activities. Advocate for solar installations designed with elevated structures to facilitate grazing and dual land use, particularly in regions with high grazing value.
- Spatial Assessment of Just Transition: Perform a geographic analysis identifying zones where renewable energy interventions can align with existing land uses and community needs, prioritizing areas with high poverty rates or significant environmental degradation.
- Identify Place-Based Justice Understandings: Conduct participatory workshops with trade unions, local private sector representatives, and marginalized groups to map region-specific justice concerns. Use findings to draft recommendations tailored to regional socio-economic and environmental realities
- Identify Funding for Community-Led Energy Projects: Prioritize securing funding for pilot projects that integrate renewable energy with water and food systems in regions identified as high-risk or under-served, such as the South or ecologically sensitive areas like Gabès. These initiatives should be grounded in participatory governance structures, enabling local communities to co-design and lead the projects.
- Include Tangible Benefits of RE projects in JT Narratives: unlike fossil fuel projects, the benefits of renewable energy projects are not visibly present in the collective imaginary. Strengthening JT narratives should emphasize how these projects can

create stable jobs, reinvest in local communities, and improve energy access, without overpromising to communities. By highlighting these tangible gains, communities can better advocate for stronger safeguards and equitable participation in project design and implementation.

- Adopt a Water-Energy-Food (WEF) Nexus Approach: Advocate for contractual obligations that explicitly incorporate WEF criteria into renewable energy projects. Propose a government-endorsed council comprising CSOs, water resource experts, and agriculture representatives to monitor compliance with WEF safeguards.
- Assess Bilateral Investment Treaties (BITs): Conduct an independent review of Tunisia's BITs, focusing on ISDS provisions that limit policy flexibility. Advocate for reforms to BITs that prioritize environmental and social safeguards, allowing renegotiation of renewable energy contracts to align with national interests.
- Create Structured Dialogue Forums for Civil Society: Organize regular, inclusive dialogue forums that bring together diverse civil society organizations. These forums should focus on key areas of contention such as green hydrogen, land rights, and investment transparency. A key deliverable of these forums could be policy papers co-authored by participating groups, outlining shared recommendations and solutions to address polarization and exclusion.
- Capacity Building:
 - Energy Markets: Provide training for CSOs, local governments, and journalists on energy markets, interconnectors, and their sovereignty, political economy, and affordability implications.
 - Financial Instruments: Organize workshops on renewable energy financing mechanisms, including feed-in tariffs, power purchase agreements, and green bonds, tailored to Tunisia's context.

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The Arab Reform Initiative is an independent Arab think tank working with expert partners in the Middle East and North Africa and beyond to articulate a home-grown agenda for democratic change and social justice. It conducts research and policy analysis and provides a platform for inspirational voices based on the principles of diversity, impartiality, and gender equality.



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