Brussels, 15 March 2021

To: Director Generals INTPA, NEAR
CC: Deputy Director-General Directorate F, INTPA; Deputy Director-General Southern Neighbourhood, NEAR; European Council Working Groups: COAFR, DEVGEN, ENER

Dear Director-Generals,

Letter from Civil Society Organizations monitoring African renewable initiatives to the European Commission and Member State Representatives

We write to you as representatives of 13 civil society organisations from Africa and the EU working to accelerate the energy transition in both Africa and the EU toward 100% renewables based and energy efficient energy systems. We understand that an EU Africa Green Energy Initiative has been proposed in the forthcoming EU Africa Partnership Strategy.

Since resilient energy systems will form the backbone of a green recovery, and can support improvements across key recovery sectors including health, digital and agri-food systems, it makes sense that the EU improve its package of support to green energy through the new Partnership Strategy and the programming of the Global Europe Instrument.

The EU should support the development of the large potentials of renewable energy sources, primarily solar, wind and geothermal in Africa; to tackle energy access; in alignment with energy efficiency; in a way that supports decent job creation across Africa. Renewable energy planning needs to be aligned with energy efficiency to reduce the supply side investments exigencies in a continent that is still energy-poor and that will grow its energy demand significantly. It is important that EU support takes tailored approaches in different regions, focusing on energy efficiency and the just transition out of fossil fuel based energy in North Africa and South Africa, while Sub Saharan Africa faces greater challenges on energy access.

However we have strong concerns around the development of an initiative which seems to be EU-led, since our understanding is that there has been minimal interaction with African leadership, and none with African civil society on the initiative as such. To ensure EU support delivers on Agenda 2030, and supports the green economy and industry in Africa, it needs to be re-configured to service African energy needs first and foremost, have a stronger focus on tackling inequalities, and support African-leadership and ownership through multi-stakeholder partnerships and civil society participation. We therefore put forward key recommendations which are provided in further detail in the Annex to this letter:

- Ensure and respect African ownership, multi-stakeholder partnerships and civil society participation
- Build on African initiatives to deliver on African needs and interests, Agenda 2030, and tackle inequalities
- Prioritise access to clean energy, renewables development and energy efficiency first
- Strengthened approach to gender responsiveness
- ‘Do no harm’ via the strongest social and environmental safeguards

We strongly urge the EU to revise its approach through consultation and close dialogue with African stakeholders, parliamentarians and decision-makers, through the programming of the Global Europe Instrument and through formal consultations on the EU Africa Strategy that seek to build on the already existing frameworks and with African interests at the forefront.
We hope we can work with you to ensure the acceleration of the African energy transition with public common good and well-being, and genuine and equal partnerships with Africa at the core. We hope that you can take these recommendations into consideration and would be happy to collaborate by providing further insights.

Yours Sincerely,

CSOs working on Africa Renewable Initiatives.

Signed and supported by:

Augustine Njamnshi, Coordinator, African Coalition for Sustainable Energy and Access (ACSEA)

Massinissa Sebai, President, Association AGIR pour le développement & l'épanouissement de la jeunesse

Dr Najoua Bouraoui, Head of APEDDUB, Association pour la Protection de l'Environnement et le Développement Durable de Bizerte (APEDDUB)

Dramane Coulibaly, Regional Coordinator, Centre d’Études et d’Expérimentations Économiques et Sociales de l’Afrique de l’Ouest - Association Internationale (CESAO-Al)

Titilope Akosa, Executive Director, Centre For 21st century Issues (C21st)

Josianne Gauthier, CIDSE Secretary General

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Dr Ahmed Hegazi, Egypt Green Energy Association, NGO

Christoph Bals, Rixa Schwarz Germanwatch

Yossef Ben-Meir Ph.D. President, Imane Akhezzane, Programs' Director, High Atlas Foundation (HAF)

Dr. Bernd Bornhorst, Head of Department Policy & Global Challenges and Peter Meiwald, Head of Africa Department, Bischöfliches Hilfswerk MISEREOR e.V. (the German Catholic Bishops' Organisation for Development Cooperation)

Mohamed Adow, Director, Power Shift Africa

Nobert Ochieng' Nyandire, National Coordinator, Sustainable Environmental Development Watch (Suswatch Kenya)
Annex: Key Recommendations on the EU African Green Energy Initiative

Ensure and respect African ownership, multi-stakeholder partnerships and civil society participation

Any support should be underpinned by principles of good governance and African leadership and ownership through multi-stakeholder partnerships and civil society participation – in particular, the utilisation of Afro-centric approaches rather than Euro-centric ones. This will undoubtedly increase acceptance and the probability of success within Africa and among African partners. Aligning with visions and frameworks of existing Africa-owned initiatives such as AREI, LDC REEEI and AFRETRAP should provide important insights on how to frame priorities and enhance collaboration. African experts, stakeholders and policy makers in a ‘Team Africa’ spirit, assisted by the existing African economic diplomacy channels and practices — should lead the design, operationalisation and implementation of any initiative relating to Africa.¹

As civil society, we understand that some European donors have been genuinely encouraged by the comprehensive African frameworks and initiatives that have originated from the continent. Over time they have also become discouraged by some failures and set-backs. In light of this, it is important that the EU does not conclude that a European-driven approach of setting the agenda for African energy is the way forward – which as civil society we find deeply worrying. The road to a 100% energy transition is long and bumpy and there are often no shortcuts. To ensure success the EU must find ways of engaging with African societies that allows for the truly African-originated, and African-owned visions and initiatives to flourish.

The initiative should build on the vision and framework of the AREI, while taking forward lessons learnt on governance. Poor governance continues to hinder energy access and sustainable development in Africa, in part exacerbated by European actions. After a promising start the implementation of the Africa Renewable Energy Initiative (AREI) has been plagued by mismanagement and governance obstacles. Reasons for failure include the way some corrupt African leaders have been allowed to further their selfish and narrow agenda with the blessing and even active support from partners in Europe. In order to be better understood, there should be an audit of the AREI to ensure serious lessons learnt can be taken on board for the EU in their current efforts to engage with Africa.

This means that European and other partners must engage with – and support – civil society and independent scholar-activists and the African scientific community much more intensively and in new ways, to build genuine, long-lasting collaboration, partnerships and initiatives. We believe it is through these channels we will find the solutions and partnerships for transforming our societies for the well-being of all.

At a time when we are experiencing a shrinking space for NGOs and CSOs worldwide, their role in this initiative cannot be overemphasized. There are already many examples of multi-stakeholder partnerships to draw on. These should be explored, and appropriate formats of engagement should be further developed. Such an inclusion could enhance mutual decision-making and send a clear signal that the EU is willing to depart from its traditionally asymmetric partnerships with Africa.

Build on African initiatives to deliver on African needs and interests, deliver on Agenda 2030 and tackle inequalities

Successful initiatives under the Africa-EU partnership must be rooted and originating in Africa, and must build on the important work that has already been initiated on the continent. Promotion of EU geopolitical and corporate interests within the development of an initiative meant to service green energy needs in Africa, a continent with extremely high energy access and economic development challenges is not acceptable. It distorts the focus, leads to wrong priorities and erodes credibility.

A non-paper from the European Commission on the initiative outlines a heavy foreign private sector focus, in stark contrast to the existing African owned initiatives, and highlights the importance of “Supporting EU companies’ and technologies’ access to the African markets”. This should not mean prioritising access to new markets for European corporations or to institutionalise arrangements that favour European interests vis-à-vis other non-African parties. Moreover the same non-paper envisions the Initiative will be “designed, operationalised and implemented at country level by EU Delegations in a Team Europe Spirit” without outlining the roles of African stakeholders and civil society. This and other statements around European “branding” and visibility reinforce our concerns.

Instead the initiative should genuinely seek to respect and support an African agenda; support African energy coordination; and support African capacity mobilisation and development. As an example African-based research and development should be identified as a key focus area for EU-Africa interaction. Context-compatible solutions can only be deployed by filling the current research gaps in energy and green transition, including the generation of gender-disaggregated datasets for effective gender mainstreaming. Capacity development programs also need to be put in place to empower local entrepreneurs and policy makers with technical skills on renewable energy and ultimately promote development of local renewable energy industries.

Modalities of support should be tailored to support these different actors. The Global Europe Instrument will provide financing via grants-based funding and financing through the European Fund for Sustainable Development Plus, blending facilities and guarantee, technical assistance.

The EFSD+ should primarily seek to support local economic actors as opposed to European and multinational enterprises. A greater attention to possible impacts on inequalities is also needed, since MSME and informal sector will provide back-bone of the green recovery and addressing increasing poverty and widening gaps after the COVID crisis. ²

The informal sector who make up the backbone of most developing country economies, who are often pioneering new, inclusive, green activities such as off-grid renewables and agroecological agriculture -but at the same time may lack access to credit, tenure, technology and skills. Support should be prioritised for inclusive business models, whereby environmental and social dimensions are strongly embedded in the company’s governance and mandate, and income generated is reinvested in communities. These priorities will need to be strengthened in the EU Technical Assistance Facility for sustainable energy.

Strengthened approach to gender responsiveness

The initiative should articulate a strong gender responsive approach in line with the EU's commitments in the Gender Action Plan III, the AU Agenda 2063 and Agenda 2030, which set the precedence for tackling inequalities and promoting sustainable development. Any initiative must ensure that women, youth and other marginalized groups are involved in all facets, beginning with the design all the way to its governance, implementation, monitoring and

² The EU Consensus on Development (2017) commits the EU and member states to mainstream inequality into the EU’s development cooperation.
evaluation, and particularly considering the gender dimension of energy access. The EU's new Gender Action Plan III sets out the commitment that by 2025 85% of all new external actions should have gender equality as a principle or significant objectives, further gender mainstreaming and a gender-transformative, rights-based and intersectional approach. There should therefore be explicit support for and earmarking of women's sustainable energy initiatives in the form of small-scale individual or community-owned off-grid projects as well as efforts and mechanisms for tackling inequalities within and between communities, countries and regions. Modalities of support should also be assessed from a gender perspective, and consideration of grants-based, micro-financing, and re-structuring of blended finance to ensure women, women’s organisations and enterprises (notably micro-, small-, and medium-sized enterprises) are direct beneficiaries.

Access to clean energy, renewables development and the energy efficiency first principle

Recent Council Conclusions on Climate and Energy diplomacy specified universal sustainable energy access as the headline priority for the initiative.\(^3\) The initiative should promote all kinds of renewable energy technologies to support leapfrogging of inefficient and fossil fuel energy based sources to support energy access, in particular solar; wind; pico-, micro-, small- and medium-scale hydro; modern biomass; geothermal; and marine. It should also promote the full range of renewable electricity applications, from grid-connected to mini-grids to small stand-alone systems, as well as other forms of energy, with particular consideration being paid to applications that meet the needs of poor people.

Renewable energy planning needs to be aligned with energy efficiency to reduce the supply side investments exigencies in a continent that is still energy-poor and that will grow its energy demand significantly.

The recently launched EU Hydrogen Strategy also explicitly identifies Africa – North Africa in particular – as a desired supplier of renewable hydrogen to the EU. While renewable hydrogen has an important role in global decarbonisation, including for future transportation as well as within hard-to-decarbonise sectors like shipping, fertilizer, chemicals and steel production, it is not a given that African produced hydrogen should best serve European demands. While energy export to Europe by African actors can generate profits for those directly involved, as an overall approach, the focus should be to support the continent to developing and becoming self-sufficient in renewable energy for its own, rapidly growing energy needs, both to power industrialisation as well as overcoming energy poverty, and to support intra-regional and inter-continental cooperation.

Moreover CAN Europe’s Paris Agreement Compatible Energy Scenario forsees a limited role for renewable hydrogen in the EU’s energy systems,\(^4\) and CAN Europe’s position on Hydrogen recommends that renewable hydrogen imports from third countries be avoided.\(^5\)

Do no harm

The European Green Deal and the new EU budget and recovery package makes a commitment to 'do no harm.' There should be no support through the EU Africa Green Energy Initiative or any energy related-programming for socially or environmentally harmful activities or projects. Social and environmental safeguards and multi-stakeholder engagement and public participation are cornerstones in the Frameworks of existing African originated


\(^4\) The Paris Agreement Compatible (PAC) scenario for the EU suggests a trajectory with at least 5% greenhouse gas emission reductions by the year 2030 and a 100% renewable energy supply by 2040 [https://caneurope.org/content/uploads/2020/06/PAC_scenario_technical_summary_29jun20.pdf](https://caneurope.org/content/uploads/2020/06/PAC_scenario_technical_summary_29jun20.pdf)

\(^5\) [https://caneurope.org/content/uploads/2021/02/CAN-Europe_position_on-hydrogen_February-2021.pdf](https://caneurope.org/content/uploads/2021/02/CAN-Europe_position_on-hydrogen_February-2021.pdf)
initiatives. Following the Precautionary Principle, the strongest social, environmental and human rights safeguards should apply. Fossil fuel operations and related infrastructure should be explicitly excluded from support; as should environmentally harmful activities including mega-hydro projects and nuclear power; and projects that may involve land grabbing or forced or involuntary displacement of populations. The principle of free, prior, and informed consent (FPIC) of indigenous peoples should apply to any project concerning land or resource development.