WIRED FOR INEQUALITIES

EU energy partnerships and the Global Gateway

Counter Balance
Challenging Public Investment Banks

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CONTENTS

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EXECUTIVE SUMMARY

European energy policy has been reshaped by geopolitical and market disruptions, most notably the 2022 energy crisis caused by Russia's gas cutbacks and surging post-COVID demand. In response, the EU adopted a geopolitical, securitised energy agenda, exemplified by the REPowerEU Plan, aimed at reducing reliance on Russian fossil fuels while accelerating the energy transition.

This shift aligns with a broader export-oriented, industry-driven approach embedded in the European Green Deal, the Green Deal industrial Plan for the Net-Zero age and new international trade and energy partnerships. At the heart of this strategy lies the Global Gateway, the EU's flagship investment initiative. It plays a key role in implementing this geopolitical, securitised energy agenda in the Global South: the sector accounts for half of the €300 billion of total public and private investments the EU aims to mobilise between 2021 and 2027.

The European Commission presents the Global Gateway strategy as a "values-driven" alternative to other global infrastructure initiatives in recipient countries in the Global South. However, our earlier report 'Who profits from the Global Gateway' demonstrated how **this strategic investment strategy largely serves European commercial and geopolitical interests**. By using development finance to boost private sector investments, not only it often prioritises EU companies and investors over local actors in recipient countries, but it also **sidelines the objectives the EU development budget is supposed to advance**: tackling poverty and inequalities, defending human rights and promoting sustainable development.

In the energy sector, this approach raises serious concerns. Global Gateway's energy partnerships frequently prioritise EU energy security, private-led investment models, and corporate interests, including export-oriented infrastructures, **energy market liberalisation and privatisation**. These models risk marginalising local communities, underfunding essential infrastructure, and exacerbating social and environmental harm—such as land grabbing, water overuse, and the erosion of public access to affordable, sustainable energy.

This publication critically analyses the partnerships established under the Global Gateway in the energy sector, with a focus on EU's neighbouring countries: Georgia, Albania, Israel, Morocco, Tunisia, Egypt and Ukraine. Through case studies, it aims to inform EU policy and to ensure that EU development finance supports a just energy transition - one that truly advances development objectives and expands access to public services and social infrastructure to meet people's essential needs.

Key findings from case studies

- **Georgia:** The Black Sea cable prioritises exports to the EU, risking draining domestic energy resources and reinforcing continued dependency on large scale hydropower as well as fossil energy from Azerbaijan.
- **Israel:** The Euro-Asia Submarine Electricity Interconnection raises serious concerns about continued fossil fuel dependence and potential complicity in violations of international law related to the support of occupied Palestinian territories, the exploitation of resources in these territories and the infringement of Palestinian rights.
- **Albania:** Investments in a floating solar power plant bring technical innovation and could have added value in the local context, yet it exemplifies the EU-led liberalisation and commercialisation of public utilities.
- **Morocco:** Green hydrogen initiatives, like Power-to-X, reveal patterns of green colonialism, including the further privatisation of the energy sector and redirecting renewable energy towards export. Green hydrogen projects also involve land grabbing, water overuse where already scarce, and risks the exploitation of Western Sahara without consent from its people.
- **Tunisia:** Energy infrastructure is geared toward export to Europe, as exemplified by the ELMED electricity interconnector and the SouthH2Corridor. As examples show, this risks further privatisation and control by European companies. Current green hydrogen targets are 15 times current electricity production, which risks continued fossil fuel dependence and ignoring local renewable energy needs.
- **Egypt:** EU-backed large-scale renewables - like the GREGY, high voltage electric interconnector - and hydrogen projects risk deepening inequality and environmental distress, including water scarcity and displacement of local communities for land.
- **Ukraine:** EU's support is focused on grid reconstruction and future integration with the EU market, with limited investment in decentralised renewable energy. There is a disproportionate focus on nuclear power, hydrogen, and biomethane, which risks locking-in false solutions, while reinforcing export-driven, centralised models.

There are serious risks that energy projects in neighbouring countries under the Global Gateway reinforce existing inequalities by placing European energy security and corporate interests ahead of development needs in partner countries. Instead of supporting a just energy transition, many projects promote extractive, export-driven models that undermine local development, human rights and environmental justice.

To truly align with sustainable development goals, EU development finance—particularly when deploying EFSD+ guarantees—must be directed toward energy partnerships that:

- **Prioritise local needs**, ensuring universal access to renewable, sustainable and affordable energy, while genuinely advancing a just and inclusive energy transition, and local energy security.
- **Reject large-scale hydrogen-for-export projects**, putting pressure on vital resources and diverting renewable energy capacity while local energy needs are not met.
- **Respect international law and human rights**, ceasing funding projects, directly or indirectly, linked to the extraction and/or use of resources in the occupied territories of Palestine and Western Sahara.
- **Support responsible energy actors only**, channeling public funding exclusively to energy companies that have robust, science-based decarbonisation plans, demonstrate genuine commitment to human rights and environmental protection, and do not profit from the exploitation of resources in partner countries.
- **Promote public ownership and democratic governance**, investing in energy systems that are publicly owned and democratically controlled, helping countries to regain sovereignty over their energy sources.

INTRODUCTION

In December 2021, the so-called "Geopolitical Commission", led by Ursula von der Leyen, launched the Global Gateway, a strategic initiative in development cooperation aimed at revitalising the EU's role on the global stage. The initiative was introduced with the bold ambition to mobilise up to **€300 billion** between 2021 and 2027 to support partner countries, using a **Team Europe approach**. This approach integrates Member States, the European Commission, and European financial institutions, such as the European Investment Bank (EIB) and the European Bank for Reconstruction and Development (EBRD), while placing strong emphasis on strengthening private sector's involvement (EC, 2021).

The Global Gateway aims to foster global connectivity by investing in clean, secure, sustainable infrastructure —both physical and digital—across sectors, including climate and energy, transport and digital technologies. It also seeks to enhance partner countries' capacities in health, education, and research.

Official documentation outlines six key principles for these investments: democratic values and high standards, good governance, equal partnership, green and clean initiatives, a focus on security, and catalysing private sector engagement (Ibid.). According to the Commission, these principles are intended to distinguish the Global Gateway from other global infrastructure initiatives, positioning it as a value-driven and progressive EU approach to development.

Central to the initiative is the use of public funds, drawn from the EU budget, member state contributions, and financing from European development banks, to de-risk and leverage private investment in partner countries (Ibid.). Key financial instruments to attract private investors include **guarantees and blending facilities**, provided through the European Fund for Sustainable Development Plus (EFSD+) and European development banks like the EIB.

Guarantees and blending facilities

Blending or blended finance operations combines public and private capital to fund projects, with the public sector taking on some of the risk to attract private investors. Blended finance aims at mobilising additional private or public investments from other actors, unlocking funding for development or infrastructure projects that might otherwise be deemed too risky.
It means that guarantees, as well as grants, loans, and in some cases equity investments, are used in one package to support projects in recipient countries that are not offering immediate financial returns (they are not 'bankable') and cannot rely only on guarantees to take off, but offer "public added value".

Guarantee is a financial commitment made by a public entity (like the EU) to cover part or all of the potential loss in case of a default by a borrower or project. In essence, it is a promise to reduce the risk for private investors, making them more willing to invest in projects that might otherwise seem too risky. They are legally binding agreements and, in recent years, their use as a financial instrument in international development and climate finance has been increasing.

However, the initiative has drawn substantial criticisms, as highlighted in Counter Balance's previous report **"Who Profits from the Global Gateway?".** Evidence proves that the initiative prioritises Europe's commercial interests abroad, rather than tackling global inequalities and combat poverty. By using development finance to boost private sector investments, the initiative risks sidelining development goals in favour of geopolitical and market-driven agendas. Additionally, research shows that the involvement of the private sector often fails to prioritise pro-poor activities that address essential needs and rights, focusing instead on profit and undermining the principles of development aid. Many projects come with negative social and environmental impacts, while the decision-making and implementation processes lack transparency and democratic oversight.

It is increasingly clear that the Global Gateway was never solely about international development cooperation. As von der Leyen herself stated, it is, above all, a **geopolitical project, which seeks to position Europe as a player in a competitive international market** (EC, 2022). Framed as the EU's answer to China's Belt and Road Initiative and the G7-led Partnership for Global Infrastructure and Investment, the Gateway leverages trade and investment as tools of foreign policy (EEAS, 2022). For this reason, the initiative positions itself as the core of the **EU's new connectivity strategy**, particularly in the energy, transport, and digital sectors. By placing infrastructure financing at the heart of its connectivity strategy, the EU risks allowing geopolitical ambitions to overshadow genuine development goals, especially in the Global South, where such projects can easily reflect European priorities rather than local needs.

This publication seeks to analyse and highlight the type of partnerships established under the Global Gateway, particularly in the energy sector, with a focus on several of the EU's neighbouring countries. The aim is to inform EU policy and to ensure that EU development finance supports a just energy transition - one that truly advances development objectives such as poverty reduction, addressing inequality, and expanding access to public services and social infrastructure to meet people's essential needs.

The EIB: due diligence, transparency and development additionality

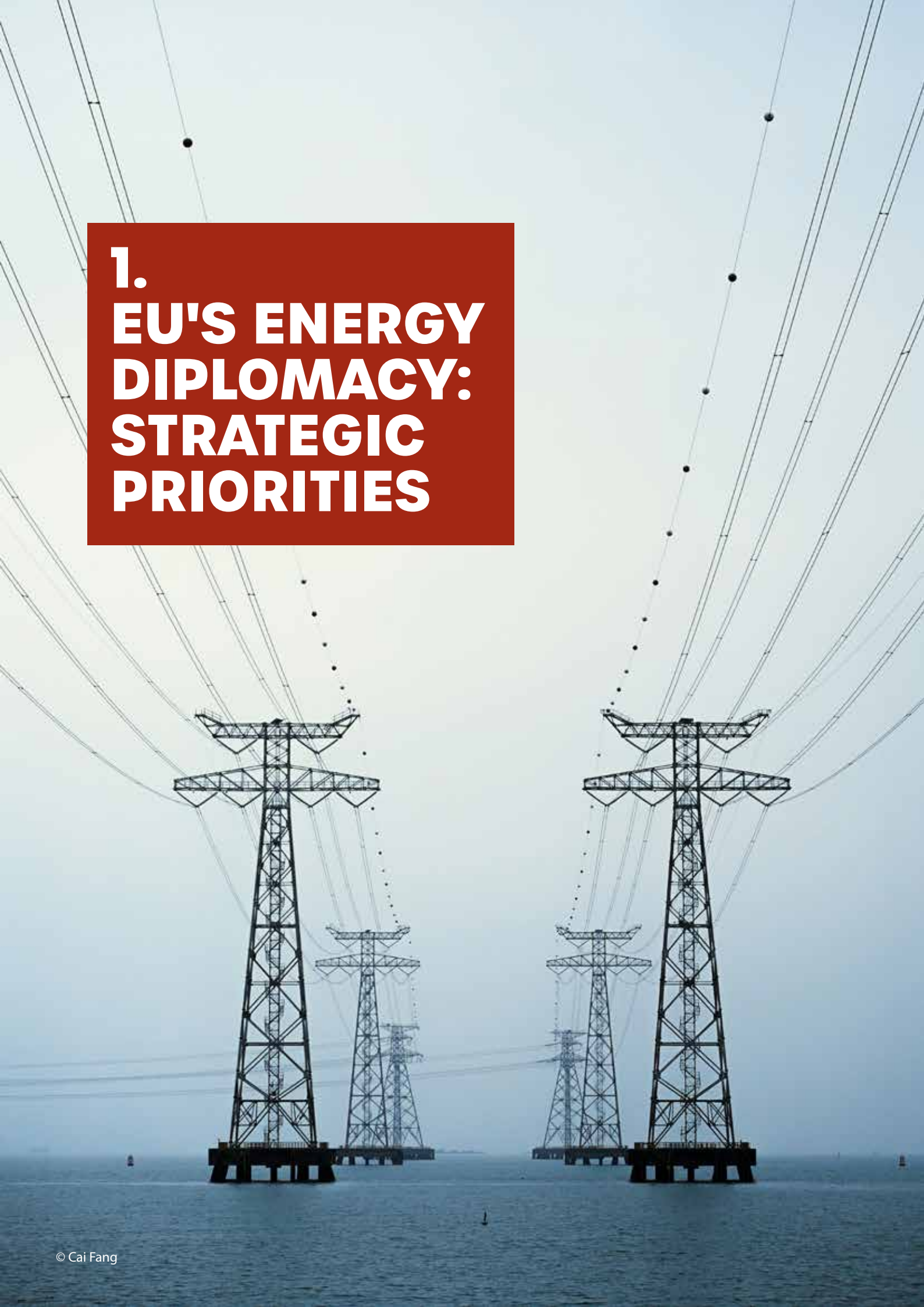
To meet the Global Gateway's target to mobilise €300 billion in investments, Development Finance Institutions (DFIs) play a central role—particularly EIB Global, the development arm of the European Investment Bank.
EIB Global is responsible for managing the largest share of EU guarantees under the initiative, overseeing €26.7 billion in EFSD+ guarantees globally. They are primarily directed toward public sector infrastructure, but they are also designed to de-risk private investments (EC, 2023m)

While the Global Gateway is framed as a value-based initiative committed to transparency, human rights, and sustainability, development banks— like the EIB—have persistently faced criticism from CSOs. As previously documented, concerns include opaque and top-down decision-making processes, limited participation from recipient countries, insufficient due diligence and accountability mechanisms, and adverse human rights and environmental impacts (Bankwatch, 2024b). A recurring concern is the lack of clear development additionality—the extent to which projects deliver benefits beyond what would have occurred without public support. CSOs have pointed out that many EIB-financed projects appear to prioritise commercial returns over genuine development outcomes.

According to the European Court of Auditors (ECA), the European Commission failed to adequately assess additionality as required by the NDICI Regulation. Alarmingly, a third of the €7.1 billion in reported EIB's operations - over €2.3 billion - was signed before the guarantee agreement with the Commission, finalised in April 2022, and were later transferred under EFSD+ (ECA, 2024). This further calls into question the development additionality, since the Bank uses many of the guarantees for projects it was already financing, rather than financing more risky projects with a higher development impact it would otherwise not be able to finance on its own.

For these reasons, the EIB must undertake reforms of its human rights and environmental policies and ensure that its activities align with national and local development priorities in the Global South (Counter Balance & Bankwatch, 2020). Moreover, the EIB should clarify how financing to private companies for projects can have a clear development additionality and contribute to the partner country's development.

1. EU'S ENERGY DIPLOMACY: STRATEGIC PRIORITIES



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From Green Deal to Green Grab: The EU's External Energy Agenda

European energy policies have been at the centre of the debate in recent years, shaped by a series of geopolitical and market shocks. Most notably, the war in Ukraine and the subsequent sharp reduction in Russia's exports of cheap natural gas - coupled with the post-COVID recovery and intensified competition in liquefied natural gas (LNG) markets- triggered the **European energy crisis of 2022** (Goldthau & Youngs, 2023).

Understanding the transformation of EU energy policy is essential. As highlighted in **Mario Draghi's report "The Future of European Competitiveness",** the EU's ambitions to achieve climate neutrality, social inclusion, and increased geopolitical relevance rely on its ability to maintain high and stable economic growth (EC, 2024a). This, in turn, is closely linked to access to cheap energy sources. Energy policy choices also have far-reaching implications for both EU's climate objectives and its international cooperation goals in the energy sector.

In response to the 2022 energy crisis, the EU adopted a securitised, geopolitically driven energy agenda (Buzan & Waever, 2003), aimed at ensuring access to primary resources through supply chain control (Siddi & Prandin, 2023). One of the key documents reflecting this change is the "**REPowerEU Plan**", which seeks to reduce European dependence on Russian fossil fuels by diversifying supply sources and accelerating the energy transition (EC, 2022b).

This new direction has brought renewables to the centre of Europe's energy security and independence strategy. It has also spurred a proliferation of international partnerships in the renewables sector (Goldthau & Youngs, 2023). According to the Commission (2022c), these partnerships on renewables should have to advance energy transition in partner countries, while boosting renewable energy imports into Europe.

One of the main interests in energy imports from partner countries is hydrogen. The European Commission's *Hydrogen Strategy for a Climate-Neutral Europe* (2020) claimed that especially hydrogen produced using renewable energy sources has a large potential to decarbonise carbon-intensive industries. This strategic focus is reflected in the REPowerEU Plan, which sets an ambitious goal of producing 10 million tonnes of renewable hydrogen within the EU and importing an additional 10 million tonnes by 2030 (EC, 2022b).

In 2019, the **European Green Deal** already introduced an external dimension aimed at supporting renewable energy development abroad, laying the foundation for a broader export strategy (EC, 2020b). A defining feature of this agenda is the connection between climate, energy, and industrial policies, both internally and externally. Indeed, following the Commission, the green transition requires the necessary raw materials and a robust industrial base to manage them, further reinforcing the inextricable link between security, independence, and competitiveness.

This is also reflected in "**A Green Deal Industrial Plan for the Net-Zero Age**", which set out to position the EU as the global leader in net-zero industries and in technologies' manufacturing while allowing for state aid to boost competitiveness in this sector (EC, 2023). This development paved the way for the **Critical Raw Materials Act** in 2023, which echoes the Global Gateway's climate and energy pillars. These initiatives aim to build new international partnerships to control supply chains and secure the provision of raw materials for European industrial demands (EC, 2023b), expanding the EU's footprint in partner countries and energy markets, particularly in renewables.

Indeed, these new partnerships are being strengthened through bilateral Free Trade Agreements (FTAs) or targeted strategic partnerships. In the case of FTAs, energy is addressed within the same chapter as Critical Raw Materials, aiming to establish market principles, de-risk access to energy transport infrastructure, and harmonise standards and regulatory practices (IEEP, 2024).

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In the case of strategic partnerships, as seen in the recent MoUs with Chile, Kazakhstan, and Namibia, efforts to strengthen value chains for critical raw materials are accompanied by European cooperation to support the development of the renewable hydrogen industry (EC, 2023b; 2023c; 2023d).

The 2022 energy crisis has also revived the goal of establishing a European Internal Energy Market, which includes, among other aspects, the **liberalisation and interconnection of energy markets** across EU member states, a process initiated in the late 1990s (Pepermans, 2018). This liberalisation is now extending beyond EU's borders, as part of a broader strategy to secure energy partnerships and attract private investment, with the Global Gateway encouraging the privatisation of infrastructure and public services in the energy sector, as explored in our earlier report.

This approach raises significant concerns. Despite widespread promotion of private sector involvement, there is a **lack of clear evidence that private sector involvement could foster development**. Instead, it often prioritises European interests over local needs for affordable, sustainable, and inclusive energy access, while also leading to potential social and environmental harm. For example, in Europe two-thirds of funding for the electricity supply chain is directed at electricity generation, while less profitable and more technically challenging and socially critical areas such as transmission and distribution are underfunded (EC, 2023e). Relying on private-sector involvement to fill these gaps outside of Europe creates a strong risk of undermining both energy access and the integration of renewable energy systems. Independent power producers (IPPs), many of which are European energy companies, are the primary beneficiaries of the commodified energy market in partner countries — suggesting a drive for private-sector-led expansion rather than a truly just transition.

Whether this model can deliver a green and fair transition remains doubtful. As extensive research shows, renewable energy markets are structurally failing to deliver a just transformation because it prioritises profit over sustainability. Relying on private investment and market mechanisms leads to outcomes that benefit business interests rather than achieving widespread and equitable access to clean energy (Financial Times, 2024). In contrast, support for a public energy market could ensure equitable access to affordable, sustainable energy, prioritise long-term societal goals and provide greater accountability in addressing environmental and social concerns. In fact, a public power company guided by the public interest could reconcile economic needs, environmental goals with social ones while ensuring greater accountability (Common Wealth, 2024)

European Energy Plans in Neighbouring Countries

The shift in European energy policies has impacted the EU's priorities and objectives in international development cooperation.

Climate and energy are grouped in the same investment category under the Global Gateway, partly explained by the fact that 70% of global greenhouse gas emissions come from the energy sector, and that many low and middle-income countries face acute climate risks (EC, 2021).

Therefore, investments towards decarbonisation of the energy system must go hand in hand with investments in climate resilience adaptation and mitigation. However, the Commission also frames energy and raw materials, part of the same investment category, as needed '*for economies to function and industries to be competitive*'. In this vein, climate finance solutions that might not align with these objectives risk being deprioritised.

As our previous report shows, support for adaptation - an essential component of climate finance - is weak under the Global Gateway, highlighting the interests that drive the EU's investments agenda. Similarly, the Critical Raw Materials Partnerships raise various concerns: the promotion of private interests without clear additionality for the partner country, an extractive approach with a history of human rights violations and environmental devastation, and the potential to deepen conflicts, as seen in the case of Rwanda's involvement with the M23 armed group in the DRC.

According to the Global Gateway launch document, the focus on infrastructure investments for the clean energy transition should contribute to improving the energy security of partner countries. Yet, its priorities are most clearly aligned with the EU's own goal of diversifying energy imports and securing access to raw materials. The document highlights three key areas of interest:

- **Regional energy integration** among partner countries, emphasising interconnection and joint projects, alongside measures to promote energy efficiency, renewable energy (including smart grids), and a just transition;
- **Developing renewable hydrogen production**, with the aim of creating competitive markets for its international trade and eliminating export restrictions or price distortions;
- **infrastructure investments for raw materials**, aimed at building resilient and sustainable raw material value chains tailored to European demands.

To better understand how these priorities unfold across regions, the **Economic and Investment Plans (EIPs)** and related initiatives in the EU Southern Neighbourhood, the Western Balkans, and the Eastern Neighbourhood are scrutinised. These plans were developed under the 2021–2024 Commission and have since been rebranded as part of the Global Gateway. Funded through the EU budget, Member States, and institutions like the EIB and EBRD, they combine grants with loans and equity to attract private capital (EC webpage).

The Western Balkans

The EIP for the Western Balkans prioritises investments in energy interconnections and the use of renewable energy resources (EC, 2024c). Specifically, the Energy Support Package, launched in 2022, provides short- and medium-term financial assistance to the Western Balkans, aiming to diversify energy supplies, accelerate renewable energy deployment, and enhance energy

On the word "Neighbourhood"

In this paper, the word "neighbourhood" is used as reference solely to the official EU terminology. This definition is self-referential and Eurocentric: it does not support a geographic description, but rather defines countries on the basis of their relational terms, thus reinforcing power dynamics.

efficiency (EC, 2022d). Implementation in this region is coordinated under the **Western Balkans Investment Framework (WBIF)**, a joint initiative of the EU, financial organisations, bilateral donors, and beneficiaries which serves as a financial platform for coordinating investments.

The Southern Neighbourhood: the Mediterranean region

The **New Agenda for the Mediterranean** and its associated EIP aimed to strengthen EU's strategic partnership with Southern Mediterranean countries. In this region, the EU's initiatives support partner countries in meeting their climate commitments and in transitioning to cleaner energy sources as green hydrogen and solar power—while reinforcing energy security and mitigating fragility in critical sectors such as water supply and agriculture.

The EIP outlines a number of flagship projects on green growth and financing green innovation projects, energy efficient construction or renovation of buildings, wastewater and desalination plants, and green agriculture (EC, 2024b). Additionally, the Commission announced a new Pact for the Mediterranean, anchored in the **Trans-Mediterranean Energy and Clean Tech Cooperation Initiative**, which aims at stimulating large public and private investments in renewable energy, enhancing energy trading, and boosting clean tech manufacturing in the region through the Global Gateway (EC, 2025b; 2025c).

North African countries are also included in the **Africa-Europe Green Energy Initiative (AEGEI)**, which aims to support the expansion of reliable, sustainable and affordable green energy investments across Africa. The initiative focuses on renewable generation, energy efficiency, and the financing of electricity transmission and regional interconnection (EC, 2023f). Green hydrogen production is also central to AEGEI, viewed as key to a renewable-based economy (Ibid.).

The Eastern Neighbourhood

The EIP for the Eastern Neighbourhood builds on the energy priorities outlined in the **Post-2020 Eastern Partnership,** and aims to mobilise up to €3.4 billion in investments to accelerate the region's energy transition (EC, 2021b). Key priorities include enhancing energy efficiency standards in buildings and making the renovation of public and residential infrastructure more accessible and affordable. The EIP also envisions targeted support for developing sustainable energy interconnections, strengthening energy security and aligning market regulations with EU standards. In addition, the plan aims to boost renewables' share in the energy mix by 10% and places a strong emphasis on the development and production of renewable hydrogen.

While the Global Gateway's energy agenda includes positive components—such as grant funding, support for energy efficiency, and regional interconnection—it also raises significant concerns. These include the expansion of private sector roles in public infrastructure, the push for ongoing liberalisation, and the use of technical assistance to shape regulatory and business environments to attract investors.

Crucially, many many renewable energy investments—particularly in green hydrogen—are designed to serve European consumption, not necessarily the needs of partner countries. This risks generating negative social and environmental impacts, and contradicts the stated aim of fostering inclusive, sustainable development.
The following chapters will explore flagship energy projects across various partner countries, offering a detailed analysis of the type of partnerships undersigned and their impact on sustainable development.

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2. INFRASTRUCTURES, IMPACTS, INJUSTICES

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GEORGIA

EXPORT-ORIENTED ENERGY TRAP

In Georgia, the only Global Gateway's flagship energy project is the **Black Sea Connectivity Submarine Electricity Cable**. This initiative aims at exporting green energy from the South Caucasus to the EU, bolstering the clean energy transition in the two regions (EC, 2024d).

The cable is set to increase the share of renewable energy reaching Europe — via Romania and Hungary— positioning Georgia into an integrated energy hub connected to the European energy market (EC, 2022e). The bidirectional cable aims to enhance national and regional energy security, interconnect the Black Sea region, diversify energy sources, and boost renewable energy production potential, while also promoting competitive pricing for electricity generated from renewable sources by leveraging regional energy capacities (Report News Agency, 2025).

Approved in 2022, this project gained significant traction following Russia's full-scale invasion of Ukraine, which underscored EU's dependence on Russian energy, in the subsequent rise in energy prices and spurring the search for alternatives. Indeed, this ambitious project aims to **supply renewable energy from the Caspian region** and strengthen the EU's ability to withstand energy supply disruptions and geopolitical uncertainties (Bzhalava, 2024). The submarine cable also aims to connect Azerbaijan through Georgia to EU members Romania and Hungary (AP News, 2024). A Memorandum of Understanding was signed between the four governments in 2022, establishing the Green Energy Corridor Power Company (GECO Power Company), composed of the national transmission operators from each country (EC, 2022e; Report News Agency, 2025; Bucharest Stock Exchange, 2025).

The submarine cable will span over 1,155 km (1,115 km underwater and 40 km over land), operating at a voltage of 525 kV and a capacity of 1,300 MW. Completion is expected by 2030, with an estimated cost of €3.5 billion (Report News Agency, 2025; Bucharest Stock Exchange, 2025).

Financing includes a **€2.3 billion investment from the European Commission** (Offshore Energy, 2024b) and a $35 million loan from the World Bank (WBG, 2024), according to public information. Moreover, the project has been included in **ENTSO-E's 10-year development plan for 2024-2034,** a pan-European electricity infrastructure development plan and was submitted to the European Commission for recognition as a Project of Common Interest (PCI), which would ease the permitting and **potentially unlock funding from the Connecting Europe Facility (CEF),** a key financial instrument that provides support through grants, guarantees, and project bonds (Report News Agency, 2025).

ENTSO -E

The European Network of Transmission System Operators for Electricity (ENTSO-E) coordinates the operation and development of Europe's electricity grid. Membership allows countries to integrate more closely into the EU energy market, access cross-border electricity trade, and participate in long-term grid planning. However, joining ENTSO-E also comes with trade-offs: it can reduce national control over energy systems, accelerate the privatisation of critical infrastructure, and prioritise export-oriented projects over domestic energy access and affordability—especially in countries at the EU's borders.

Projects of Common Interest (PCIs)

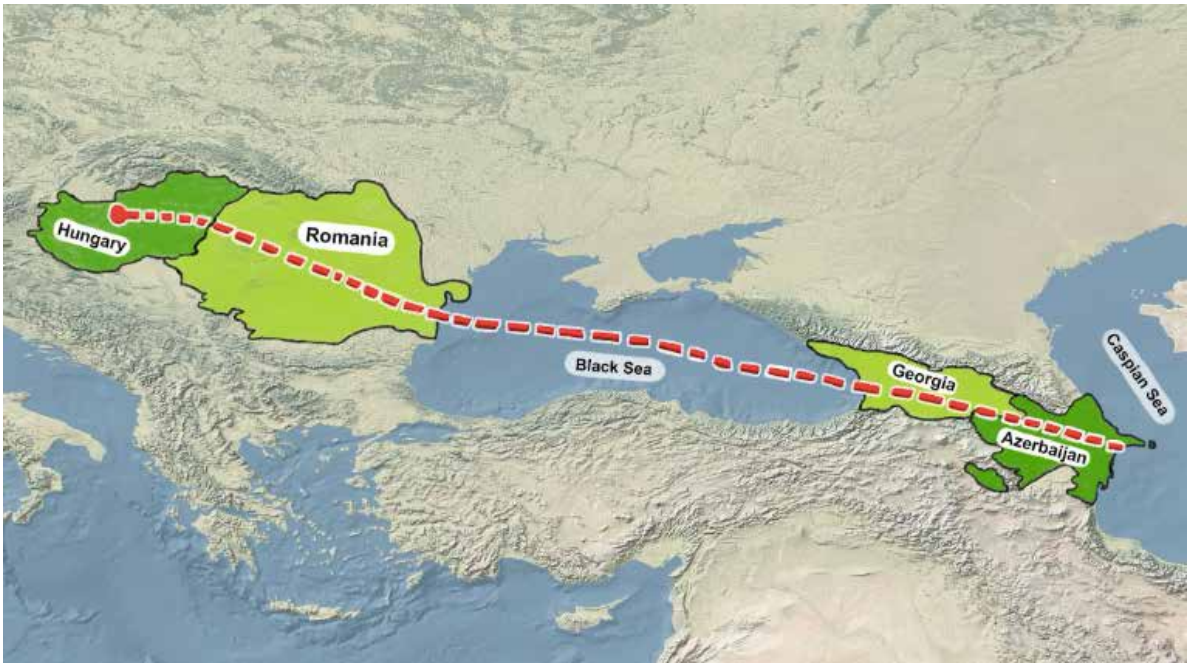
Projects of Common Interest are large-scale energy infrastructure projects promoted by the European Union as key to completing the internal energy market and achieving climate and energy objectives. Launched in 2013, the PCI framework claims to support affordable, secure, and sustainable energy, and a climate-neutral economy by 2050. In practice, however, many of these projects risk locking in fossil fuel infrastructure, deepening market liberalisation, and sidelining public interest and environmental justice concerns.

Projects are first screened based on whether infrastructure is deemed the appropriate solution to a specific energy "need" — a framing that tends to prioritise supply-side fixes and cross-border market integration. Those that pass this initial filter are assessed against the criteria in the TEN-E Regulation, with the most "strategic" ones added to the Union list of PCIs, a designation that grants fast-track permitting and potential access to EU public funding, often with limited democratic oversight or scrutiny of broader socio-environmental impacts.

Development impacts and emerging risks

The project is being promoted as highly strategic for Georgia, with anticipated benefits including enhanced energy security, the promotion of renewable energy, and positive economic and social impacts (Bzhalava, 2024). However, several critical issues cast doubt on the extent to which these expected benefits can actually be realised.

Georgia's energy profile adds important context for evaluating this project. In 2020, Georgia's final energy mix was composed of natural gas (38.5%), oil (29.3%), electricity (22.0%), with renewables accounting only 5.5% of the final energy use. However, in 2021, renewables rose to 81.1% in the electricity mix, largely driven by hydropower (IEA, 2023). As a country with no significant fossil fuel reserves, Georgia, which has shifted away from Russia since the 2006 energy crisis, heavily relies on Azerbaijan, which provided 84.1% of the country's natural gas and 17.9% of its oil in 2023 (Ibid.).



Map of Black Sea Cable, source: Renewables.az (2025)

Despite the green framing of the Black Sea cable, **Georgia does not currently have a renewable energy surplus**. Exporting electricity risks undercutting domestic needs, especially during peak demand or low water years and there is no guarantee that this would be set to change when the cable would become fully operational in 2030. Some of the electricity sent to Europe could also come from non-renewable sources, contradicting the project's green credentials.

To align with European climate and energy policies, Georgia's Integrated National Energy and Climate Plan (NECP) sets a target of 27.4% renewables in final energy consumption by 2030 and identifies EU integration as a path to stability and investment (Stockholm Environment Institute, 2024). Yet, recent political instability and laws such as the controversial "foreign agent" law, have slowed the EU accession process and could undermine investor confidence and progress in the renewable sector.

The climate commitments of the project's corporate partners have substantial flaws. For instance, JSC Georgian State Electrosystem makes **no mention of sustainability** in its most recently published annual report of 2023, raising questions on how this is embedded in its strategy. This document includes only **limited references to environmental preservation and minimising social impact** in the section on environmental protection and social responsibility, while it does not include any plan for CO2 reduction (JSC Georgian State Electrosystem, 2023).

MVM Zrt, on the other hand, is undoubtedly the company that has outlined the clearest strategy to align with the principles of the Paris Agreement. In fact, in its decarbonisation roadmap, it has set various targets for greenhouse gas emissions' reduction and has outlined several strategies to achieve this (MVM Zrt, 2021). In contrast, AzerEnerji ASC and Transelectrica S.A. have not clearly outlined their decarbonisation and energy transition strategies, although they have undertaken some initiatives in this direction (see Ansaldo Energia, 2024; and Italian Trade Agency, 2024). However, such individual initiatives cannot replace a comprehensive, systematic decarbonisation and transition plan, as they only represent a limited aspect of their activities rather than a structural response.

Meanwhile the Georgian government is actively working to diversify its sources of oil and natural gas while simultaneously **promoting the expansion of large hydropower projects,** including the construction of large reservoir hydropower plants (HPP), to meet rising demands and reduce energy imports (Caspian Policy Center, 2022). Yet, these projects are associated with significant environmental and social challenges: environmental damage to flora and fauna, inadequate legal protections for displaced communities and their needs, and a lack of transparency in contract awards, which has fuelled public distrust of foreign companies involved in the projects (Ibid.).

Past EBRD-backed HPPs—like Paravani, Dariali, and Shuakhevii—faced significant controversy due to **flawed planning, worker deaths, and community harm** (Bankwatch, 2015). Export-oriented infrastructure like the submarine cable may incentivise further investment in these controversial HPPs, reinforcing extractive energy models—one that deepens regional inequalities, fuels public resistance, and sidelines principles of local energy justice and democratic participation. To avoid repeating past mistakes, future investment strategies must be grounded in transparency, accountability, and the fair distribution of benefits. They must put the needs of communities and ecosystems at the centre of energy planning, rather than allowing the drive for European energy diversification to override local priorities and rights.

The Caspian Policy Center (2022) recommends shifting investments from large reservoirs to smaller-scale hydropower and distributed renewables like solar and wind—technologies more suitable to local needs and less disruptive social and environmental impacts.

This highlights a further weakness in the Global Gateway's approach to involve **the private sector, as it tends to prioritise large-scale, high-profit projects,** while less profitable, technically complex, and socially critical areas—such as transmission and distribution—remain underfunded (Eurodad & Counter Balance, 2024).

The project is explicitly aimed at **exporting renewable energy from the Caucasus, with Azerbaijan being one of the involved countries.** It has significant renewable energy potential and plans to develop large-scale solar projects, along with offshore and onshore wind farms along the Caspian Sea coast. However, the sector remains largely underdeveloped. Azerbaijan plans to generate 30% of its electricity from renewables by 2030, but will still rely on fossil fuels for the remaining 70% (Interfax, 2024).

For this reason, **a significant share of the electricity transmitted through the cable risks coming from fossil sources,** casting further doubt on the cable's climate credentials. Additionally, Azerbaijan's growing energy exports, particularly after Russia's invasion of Ukraine, strengthen an authoritarian regime with a record of military aggression and human rights abuses condemned by the European Parliament[1] and human rights groups ahead of COP29 in Baku[2].

Challenges of past HPPs projects

Large hydropower projects (HPPs) in Georgia have been the focus of sustained controversy due to their significant environmental, social, and governance risks. Among them, the Paravani, Dariali, and Shuakhevi HPPs—financed by the EBRD between 2011 and 2014—stand out for the scale of the damage they caused (Bankwatch, 2015).

The Paravani HPP was linked to increased flooding risks in the village of Khertvisi and harm to local ecosystems. The Dariali HPP was built in a protected area following concerns over corruption and poor site selection; during its construction, ten workers lost their lives. Meanwhile, the Shuakhevi HPP was developed without proper geotechnical assessments, neglecting serious landslide concerns in nearby villages and refusing to offer compensation in cases where construction causes damage. Other examples include the Khudoni Dam, which risks the forced resettlement of 2,000 people, and the Nenskra HPP, which threaten to dispossess the local Svan community of their land and livelihoods. In both cases, the project promoters didn't adequately address potential negative impacts and ignored local communities' concerns.

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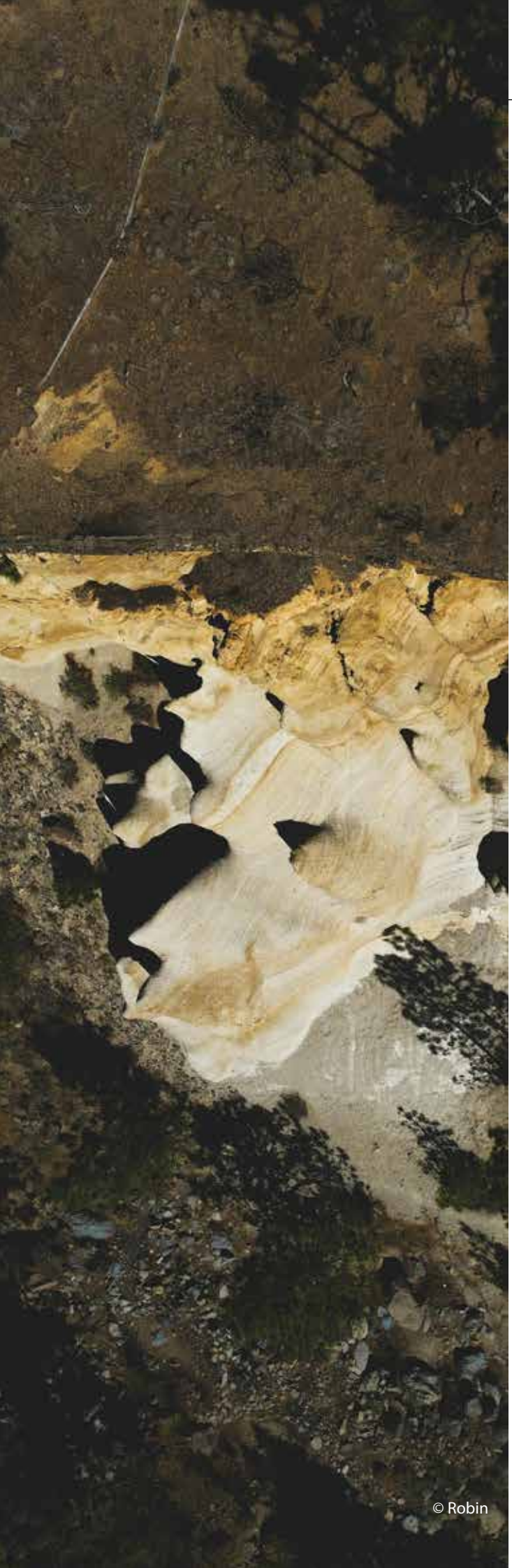
These projects exemplify broader criticisms levelled at Georgia's large HPP strategy, including environmental degradation, loss of biodiversity, poor legal safeguards for affected communities, and a lack of transparency in procurement and foreign investment processes. Public trust has been undermined by a perception that these projects prioritise private profit and energy export over local welfare and ecological sustainability.

1 The Azerbaijani government was condemned by a European Parliament resolution in 2023 for an "unjustified military attack" in the Armenian region of Nagorno-Karabakh and for a "gross violation of human rights and international law" for forcing at least 100,000 people to flee (Politico, 2023).

2 NGOs such as Freedom Now and Human Rights Watch have accused the government of human rights violations due to intensifying media repression ahead of the COP29 in Baku, as at least 20 journalists, along with human rights defenders, union leaders, lawyers, and environmental activists, have been imprisoned (Human Rights Watch, 2024).



The Black Sea Connectivity Submarine Electricity Cable channels substantial EU public funds—through the Global Gateway and potentially the CEF—into a project that prioritises European energy diversification over Georgia's domestic energy transition. It may deepen reliance on controversial hydropower and fossil sources, particularly from Azerbaijan, and does little to improve Georgian energy access, resilience, or justice, nor it does not contribute to improving Europe's energy security, as it increases reliance on Azerbaijani energy resources, both renewable and non-renewable, bringing with it the risks associated with engaging with an authoritarian regime.

To avoid reinforcing extractive energy models and authoritarian regimes, EU funding should instead support projects that deliver tangible, inclusive benefits to Georgia—especially in strengthening local renewables, energy equity, and democratic governance. Without such recalibration, the project risks undermining the very transitions it claims to promote.

ISRAEL

GREENWASHING OCCUPATION

In 2024, the Euro-Asia Submarine Electricity Interconnection Cable—also known as Great Sea Interconnector— linking Greece, Cyprus and Israel, was announced as a flagship project of the Global Gateway. The project aims to establish **a multi-billion-euro, 1,240 km underwater high-voltage direct current (HVDC) connecting Europe, the Middle East, and Asia.**

Its goal is to facilitate the transmission of clean energy between the three countries, to enhance regional energy security and support the transition to a net-zero future (Offshore Energy, 2024c). The interconnector will enable the exchange of up to 1,000 MW of electricity, with the potential to expand to 2,000 MW, enough to power approximately three million households (Nexans, 2023).

The idea of linking national power grids took shape when Cyprus, Greece, and Israel formalised their cooperation through a **Memorandum of Understanding (MoU)**, signed during a ministerial meeting in Nicosia in 2013. This agreement set the stage for two key regional energy initiatives: **the Euro-Asia Interconnector** and the **Eastern Mediterranean Pipeline**, also known as East-Med (Koukakis, 2023).

The trilateral partnership was mainly driven by Israel's and Cyprus's energy security goals, both relatively isolated energy markets seeking grid integration and emergency support, along with closer ties to the EU power grid (Harari, 2024). A major driver for this cooperation was also the **discovery of vast energy reserves in the Levantine Basin** (2009-2011), which has positioned Israel as a major natural gas exporter.

For Israel, exploiting these resources helps lower costs and facilitate the transfer of natural gas to the European market (Zemach, 2016), an intention that was remarked by Israeli Energy and Infrastructure Minister Eli Cohen (Ekathimerini, 2024).

The project unfolds in two phases. The first connects Cyprus and mainland Greece via Crete, and is scheduled for completion by the end of 2026 and connect both islands to the European electricity network.

Decision makers promote the project by claiming it will enhance energy security for Cyprus and Crete is a necessary measure for the transition to a green economy (Offshore Energy, 2021).

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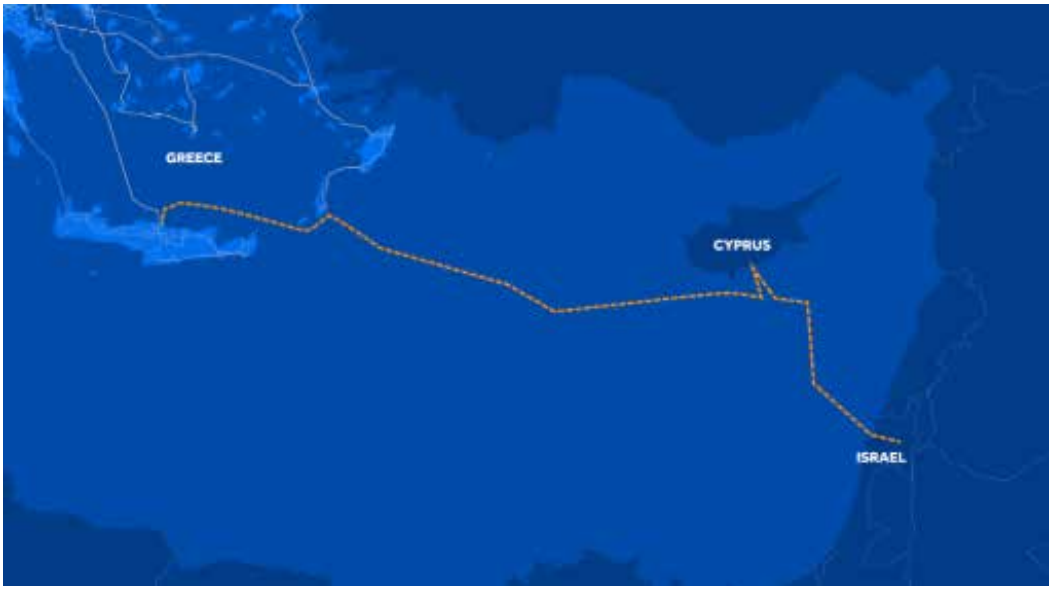

Map of the Great Sea Interconnector, source: Tovima (2025)

With an estimated cost of €1.57 billion, this part of the project has received substantial EU financial support, including a €657 million grant from the CEF, benefitting from the PCI status due to its strategic importance in regional energy integration, and an additional €100 million from the Recovery and Resilience Facility (RRF) (EC, 2022f). The remainder of the funding will be shared between Cyprus (67%) and Greece (37%), in line with the expected distribution of benefits (Harari, 2024). For this phase of the project, Nexans, a French multinational specialising in the production of cables and wiring systems for energy interconnections, has been awarded a major contract worth €1.43 billion (Nexans, 2023).

The second phase will link Cyprus and Israel, deepening Israel's connection with European energy markets (Offshore Energy, 2024c). While the project benefits from strong political support from the EU as PCI and Global Gateway flagship projects, its financing is still unclear. Further development is likely impacted by the first phase's progress and the ongoing Israeli war on the Occupied Palestinian Territories (OPT) and neighbouring countries.

At the moment, the first phase of the project is already facing serious delays. Greece's electricity transmission system operator, Independent Power Transmission Operator (IPTO), has raised the alarm over a €100 million funding deficit caused by Cyprus' proposed revenue recovery plan (Offshore Energy, 2024). Nexans has warned that it may withdraw from the contract if the issues causing delays remain unresolved (Ibid.). External pressure has also intensified. Turkey claims the cable would cross its continental shelf and has deployed naval vessels prompting Greece to dispatch warships (Philenews, 2025). Turkey's demand for permits for seabed surveys and cable-laying has added another obstacle to the project's viability, prompting warnings by both Nexans and IPTO (Ibid.).

Meanwhile, internal disputes in Cyprus over the transfer of project oversight from IPTO to its subsidiary, the Great Sea Interconnector (GSI), have introduced legal and technical ambiguities (Ibid.). Cyprus is reportedly weighing a potential stake in GSI, but unresolved concerns have prompted IPTO to suspend €70 million to Nexans (Cyprus Mail, 2025). Greek media report that Athens has adopted a wait-and-see approach, wary of the French company's power to initiate a compensation clause that could force IPTO to repay the EU's €160 million contribution (Ibid.).

Despite these escalating challenges, the governments of Israel and Greece continue to affirm their political support for the interconnector. Israeli Energy and Infrastructure Minister Eli Cohen and Greek Foreign Minister George Gerapetritis have recently reaffirmed their countries' political commitment to completing the project (Ekathimerini, 2024; Cyprus Mail, 2025b).

Development impacts and emerging risks

As of 2023, Israel's domestic energy production was dominated by natural gas (92.3%), with renewables —mainly geothermal, solar and wind energy— contributing just 6% (IEA, 2023b). Renewables accounted for approximately 11.5% of electricity generation, while natural gas and coal made up 70.8% and 17.5% respectively (Ibid.). These figures indicate that Israel is not yet capable of exporting significant volumes of clean energy through the Great Sea Interconnector. In fact, the **electricity transmitted via the submarine cable would be generated nearly 90% from fossil fuels,** leading to further lock-in of fossil fuel infrastructure.

Violations of international law

Any investment or involvement in the energy sector in Israel is a matter of legal and ethical concerns, as they may contribute to serious **violations of international law perpetrated by Israel in occupied Palestinian territory**, including Gaza. In its advisory opinion of 19 July 2024, the International Court of Justice (ICJ) declared Israel's occupation of Gaza and the West Bank, including East Jerusalem, as unlawful, along with the associated settlement regime (UN Human Rights Office of the High Commissioner, 2024).

Israel's electricity grid supplies both Israel and illegal settlements in the West Bank, East Jerusalem, and the occupied Syrian Golan without distinction, as the Israeli government administers and integrates these settlements into its national infrastructure as if they were part of its territory. (SOMO, 2024). Amnesty International has documented how this system supports apartheid policies against Palestinians, such as discriminatory zoning and denial of electricity access to Palestinian communities, which in turn facilitates their forced displacement (Amnesty International, 2022).

As a result, any third-party supplying electricity infrastructure, or providing financial support to Israeli electrical system cannot prevent their contributions from aiding the upkeep and expansion of these settlements (SOMO, 2024).

For this reason, the Great Sea Interconnector and **the energy that could flow into Israel's national grid may contribute to supporting these illegal actions.**

This presents a legal risk for Greece and Cyprus. The ICJ's opinion explicitly states that states must refrain from engaging in economic or trade relations with Israel if they contribute to maintaining its unlawful presence in the occupied territory (ICJ, 2024). Furthermore, companies involved in supplying Israel's electricity grid, particularly those investing in gas extraction and renewable energy projects that power the grid, are considered to be supporting the continuation of this illegal situation (Ibid.). The "Don't Buy into Occupation" coalition has reported increasing links between European financial institutions and companies operating in Israeli settlements, with 822 institutions tied to 58 companies active in Israeli settlements in 2024 alone, a growing number from 776 in 2023 (Reuters, 2024b).


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A blank cheque to EU corporates

There are also serious international law and environmental concerns regarding electricity exported from Israel to Cyprus and Europe through the cable, concerning the share of natural gas (70.8% in 2023) and of renewable energy (11.5% in 2023) in the electricity generation mix.

Three weeks after Israel began its war on Gaza in 2023, the Ministry of Energy granted **12 new natural gas exploration licenses in Palestinian maritime zones** to six companies, including Italy's Eni, Britain's BP and Israeli Ratio Petroleum (The New Arab, 2024). Under international law, exploiting natural resources in the occupied Palestinian territory for commercial purposes not benefiting the occupied population is prohibited, while foreign gas exploration in Palestine's maritime areas violates the Palestinian people's right to self-determination, including control over their natural resources (Ibid.).

Given the high share of natural gas in the electricity generation mix, the Great Sea Interconnector could potentially transmit fossil fuel energy to Europe in the future sourced from the exploitation of Palestinian energy resources, resulting in a violation of the rights of the Palestinian people.

Israel's renewable energy outlook also raises red flags. Despite a 2020 target to generate 30% of electricity from renewables by 2030, progress remains slow due to bureaucratic hurdles, lack of available land, and the cost-competitiveness of newly discovered offshore gas (International Trade Administration, 2023). Given the delays to date with plans for expanding renewable energy production, there are significant doubts about Israel's ability to achieve its objectives in this area.

Moreover, as of August 2024, a minimum of **ten commercial Israeli renewable energy projects are functioning in the occupied West Bank, the Syrian Golan, and the Naqab.** These projects rely on expropriated land and provide power to Israeli industries and settlements across the Green Line, further entrenching Palestinian dependency and underdevelopment (Who Profits Research Center, 2024). Furthermore, an additional 23 renewable energy projects are planned in the occupied West Bank, along with a proposed high-voltage transmission line spanning most of this territory (Office of the European Union Representative, 2024). These figures show how part of the renewable energy in the Israeli energy mix exported through the Euro-Asia Submarine Electricity Interconnection could come from exploiting Palestinian territories and resources in violation of international law.

Some critics have also **questioned the project's economic rationale.** They argue that the interconnector, heavily promoted by a lobby pushing the "European electricity economy", is based on shaky foundations since cheaper, more practical alternatives exist and Cyprus will struggle to compete with lower-priced exports from Greece and Israel (Harari, 2024).

Meanwhile, the project's shareholder structure has shifted to include the Paris-based investment management firm Meridiam in Greek company IPTO overseeing the project's execution (Offshore Energy, 2024d). The latter is reportedly in talks with potential investors regarding equity participation and is negotiating with Greek commercial banks (Ibid.).

The growing role of profit-driven private actors raises concerns about the use of public funds and the long-term sustainability of the project. Germany's Siemens Energy was chosen as the preferred contractor for the construction of converter stations (Ibid.). Several reports highlight the company's past implication in controversial projects, including the Boujdour wind park in Moroccan-occupied Western Sahara and an LNG megaproject in Mozambique associated with human rights abuses and in contradiction with climate commitments (Urgewald, 2021).

In summary, while the Euro-Asia Submarine Electricity Interconnection is framed as a clean energy flagship of the Global Gateway initiative, serious concerns undermine this narrative. Israel's current energy mix makes it unlikely that the project will serve as a conduit for renewable energy exports anytime soon. Worse, the interconnector may facilitate violations of international law, including the exploitation of occupied territories, the support of illegal occupation, and the infringement of Palestinian rights. The growing involvement of private entities and the questionable use of public funds must be scrutinised, calling into question the project's contribution to a genuinely just and sustainable energy transition.


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ALBANIA

FLOATING SOLAR PHOTOVOLTAIC POWER PLANT, SINKING REGULATIONS

This Global Gateway project aims to develop a **12.9 MW floating solar photovoltaic power plant** on the Vau i Dejës reservoir, which supports one of Albania's largest hydropower facilities. It will be the first medium-sized hybrid plant combining floating solar and hydropower in the Western Balkans, as well as the first to implement pure-float technology in the region (EC, 2025d).

Beyond its direct energy contribution, the initiative is expected to serve as a model for similar projects, facilitating replication across other reservoirs in Albania and neighbouring countries (Ibid.). Once operational, the plant is projected to generate over 18 GWh of electricity annually, preventing the release of approximately 8,700 tonnes of CO_2 each year (Ibid.).

The facility will be built on the reservoir of Vau i Dejës hydropower plant, managed by Korporata Elektroenergjitike Shqiptare (KESH), a state-owned enterprise. By making use of Albania's abundant solar resources while preserving limited land, the project represents a notable innovation in green infrastructure (EBRD, 2021).

KESH operates three major hydropower plants with a combined capacity of 1,350 MW, supplying approximately 70% of Albania's domestic electricity production (Ibid.). The addition of the new solar PV plant will enhance KESH's resilience to climate-related challenges, particularly those linked to hydrological fluctuations and seasonal variations (Ibid.).

The project is supported by the EU through its Western Balkans Investment Framework with **a grant of €2.7 million** (Balkan Green Energy News, 2024), alongside a contribution from the Albanian government worth €1.9 million (SeeNews, 2025). Additionally, the project is backed by a €9.1 million loan from the EBRD, which will be granted to a special-purpose vehicle (SPV) created by KESH specifically for its development, named Solar Energy of Albania (SENA) (EBRD, 2021). Moreover, a consortium consisting of China's solar and wind power equipment manufacturer Sungrow and Spain's engineering firm Gamma Solutions has secured a €13.9 million contract to design, construct, and operate the project (SeeNews, 2025), which is scheduled to begin production in 2026 (Albanian Daily News, 2024).

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Development impacts and emerging risks

The project **aligns with Albania's national energy priorities**, especially the need to diversify beyond hydropower, which currently dominates the renewable sector but poses environmental and social risks, and is highly vulnerable to hydrometeorological conditions (Hoxha et al., 2024). On the other hand, Albania's geographic location offers excellent conditions and prospects for further development of solar energy, making it a valuable investment for energy security, increasing renewable energy sources, and advancing decarbonisation efforts (Qamili & Kapia, 2024).

Floating photovoltaic systems provide several advantages over land-based solar farms, notably on land conservation. However, they come with **higher installation costs and technical complexities.** The Albania project is estimated to cost roughly twice as much as standard ground-mounted systems (Clean Technica, 2019), largely due to required site-specific assessments and engineering (Revolutionized, 2023).

While early evidence shows promise, **more data is needed to evaluate their long-term durability and performance** under real-world conditions (Mibet Energy, 2024). Although an environmental and social impact assessment commissioned by the EBRD found no major risks if mitigation measures are followed (Alpage, 2020), further scrutiny is warranted—particularly as the project model relies heavily on private sector involvement within a liberalising energy market.

The progressive liberalisation of the domestic energy market

The EBRD loan for the project is expected to support the commercialisation of KESH, one of Albania's largest state-owned utilities (EBRD, 2021). This financing model is based on the project's cash flow for repayment and is provided under standard market conditions, without preferential subsidies. Once SENA, a subsidiary of KESH, received the loan, it assigned the design, construction, and operational phases to private companies Sungrow and Gamma Solution, which are expected to repay the debt through revenues generated from electricity sales.

This arrangement could **incentivise the companies to pursue a profit-maximisation strategy** which, if not properly regulated and monitored by public institutions, could lead to negative consequences. For instance, during the design and construction phases, vital environmental and social impact considerations may be overlooked, particularly given the technical complexities that building a floating photovoltaic system imply. While in the operational phase, inadequate regulation could enable practices such as inflating electricity prices or cutting corners in long-term maintenance.

More broadly, this Global Gateway project, while contributing to renewable energy production, is part of **a wider EU-driven push to liberalise Albania's internal energy market**. Over the recent decades, the Albanian legal framework for the energy sector has evolved substantially, including the promotion of renewable energy sources, driven by Albania's commitments to EU integration and its participation in the Energy Community Treaty (ECC Legal Matters, 2023). This Treaty seeks to extend the EU's internal energy market to neighbouring countries, ensuring energy security, sustainability, and competition (EC, 2005). In line with these goals, the Albanian government has introduced new legislation regulating the energy sector and is currently working towards full market liberalisation (Qamili & Kapia, 2024).

It is critical to ensure that European public funding does not subsidise private profits at the expense of environmental and social safeguards. This issue becomes even more pressing in the context of energy market liberalisation, which risks driving up energy prices and reduces public control over essential resources, deepens reliance on profit-driven private actors, and weakening regulatory protections. EU development funds must not be used to support the liberalisation of energy sectors in recipient countries. They should rather be used to support strong regulatory frameworks, robust oversight and continuous monitoring to ensure supported energy projects prioritise sustainability and public welfare.

MOROCCO

GREEN HYDROGEN, GREEN COLONIALISM

Morocco is one of the main beneficiaries of European funding in the southern Mediterranean countries and has a long-standing history of cooperation with the EU in the green energy sector. Between 2017 and 2022, the EIB has allocated approximately 20% of its funding in Morocco to renewable energy, while the EBRD has invested $148 million in the country 's energy sector since 2012 (IEMed, 2023). According to the Commission, a central element of the partnership is to secure renewable energy imports for the EU, while Morocco is expected to benefit from greener industries, job creation, increased tax revenue, and enhanced competitiveness (EC, 2022g).

Recent cooperation is being framed through the **EU-Morocco Green Partnership**, signed in October 2022. This partnership lays the foundations for closer collaboration on renewable energy and green hydrogen development, in line with the objectives and strategy of the Global Gateway (EU Neighbours South, 2023). For instance, the €50 million "Green Energy" programme, one of the Green Partnership initiatives, seeks to accelerate Morocco's green transition by promoting regulatory reforms for a more open electricity market, promoting local energy production, improving integration with the European electricity network, and strengthening electricity market governance (IEMed, 2023).

Under the **Global Gateway Africa-EU Green Energy Initiative**, one of the flagship projects is the construction of a "Power-to-X" (P2X) hydrogen power reference plant through a Public-Private Partnership (PPP) (EC webpage2). This model facility will convert renewable energy into hydrogen and other energy forms, such as green ammonia and green methanol.[3] The project aims to produce 10,000 tons of hydrogen per year (AGC Communication News, 2024). Aligned with European and German hydrogen strategies, it benefits from a €100 million grant to reduce investment risks, encourage private sector involvement, and foster a green hydrogen economy in Morocco (EC webpage 2).

This is not the only Global Gateway flagship project in the sector. The "Large-scale Global Green Hydrogen Project" is in the list for 2025, an investment that brings together Morocco, Argentina and Namibia. Its goal is to establish a sustainable green ammonia production facility from green hydrogen by leveraging these countries' abundant wind resources (EC, 2025e). According to the Commission, green ammonia could play a key role in the EU's energy transition by serving as a carrier for transporting green hydrogen, while also possibly positioning Morocco as one of the leading players in the global hydrogen market. However, this project is at an early stage, with the land partnership agreement, wind measurement campaign and final draft of the project, and the submission of the Environmental Impact Assessment scheduled for 2025 (Council of the EU, 2024).

These Africa-EU Green Energy initiatives aim to **develop a renewable hydrogen sector by "unlocking business opportunities" and fostering the creation of a competitive market for international trade** (EC, 2021; EC, 2023f). These projects feed into the EU's targets, set under REPowerEU, of importing 10 million tonnes of renewable hydrogen by 2030 (EC, 2022b).

3 The production of methanol for green shipping is one of the flagship projects listed in the Commission's infographics. At the time of writing, no additional information are available on funds allocated, as well as any other activities correlated to this objective


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While Global Gateway projects in this sector are still in their early stages, the European energy partnership with Morocco appears geared towards establishing Morocco as a key supplier of green hydrogen to Europe.

At the same time, the European interest in the green hydrogen sector aligns with Morocco's official strategy. The latter envisions substantial future exports of Moroccan green hydrogen to Europe, particularly to Germany, which supported the development of the plan itself, both technically and financially (GH2 webpage). [4]

As a result of the strategy, in March 2024, Prime Minister Aziz Akhannouch unveiled the "Morocco Offer" to strengthen the country's green hydrogen sector and enhance its global competitiveness. The offer covers the entire hydrogen value chain, capitalising on Morocco's resources, strategic location, and infrastructure to promote renewable energy, attract investment, and guide implementation (Ibid.). To support this vision, the government has designated one million hectares of public land for investment, aiming for a 4 TWh domestic hydrogen market and 10 TWh in exports by 2030 (Ibid.).

Europe's hydrogen plan: risky and unrealistic

Europe's own hydrogen ambitions are faltering. Although numerous industrial projects are planned, only 5% of European hydrogen projects targeted by 2030 have reached a final investment decision. Already in July 2024, the European Court of Auditors (ECA) warned the EU's goal to produce 10mn tonnes of green hydrogen by 2030 was "unrealistic" (Financial Times, 2024b).

The evaluation draws on the uncertainty about projects' bankability, as well as their soaring costs, which have doubled despite efforts to kick-start the sector with subsidies (Financial Times, 2024c). To these challenges, it adds the lack of coordination among EU Member States, prolonged debates over technical and environmental criteria, and economic and regulatory uncertainties, making industrial players hesitant to commit significant resources to high-risk ventures (Energy News, 2025). For the time being, no European country has set specific targets for hydrogen production in its national energy strategy (Financial Times, 2024d).

Growing competition from alternative technologies, such as electrothermal batteries and heat pumps, is also undermining the long-term case for hydrogen, suggesting that the role that green hydrogen will play in 2050's energy transition will be much smaller than initially projected (Financial Times, 2024c).

The broader international hydrogen market remains dominated by grey hydrogen produced from fossil fuels. 96% of hydrogen consumed in Europe comes from fossil gas, while just in 2022, less than 0.1% of global hydrogen production came entirely from renewable sources (CEO, 2023; 2023b). By 2030, only 4% of global hydrogen production is expected to come from renewables (Hydronews, 2024).

This raises the risk that infrastructure built under the Global Gateway could lock in fossil fuel dependencies, but also increase exports to the EU instead of supporting a just energy transition. Overall, while small amounts of truly renewable hydrogen could have a role — for example, in decarbonising limited sectors of industry or providing local heat and electricity — renewables based hydrogen will only ever substitute a fraction of today's fossil gas consumption.

4 Germany provides expertise on hydrogen strategies, economic policy frameworks, and research and training in Power-to-X (PtX) technologies. It also launched a new funding initiative supported by a €270 million grant, the German Power-to-X Development Fund, to boost green hydrogen production in the country by enhancing project profitability and facilitating access to additional financial resources.

Development impacts and emerging risks

The Global Gateway's approach to the energy sector promotes the liberalisation and privatisation of Morocco's domestic energy market, following a broader European cooperation framework that promotes this shift toward a liberalised energy system.

The **EU-Morocco Association Agreement**, which came into force in 2000, lays the foundation for economic integration and sectoral liberalisation, including energy, while also incorporating a development component aimed at integrating Morocco's energy market into the EU (IEMed, 2023). This objective has been reinforced over time by further agreements, such as the 2007 Joint Declaration (Oil & Gas Journal, 2007) and the 2009 Financing Agreement for the Reform of the Energy Sector Support Program, aiming to strengthen Morocco's capacity for renewable energy exports to Europe (Middle East Policy, 2023). At the 2016 COP22 summit in Marrakesh, the EU and Morocco agreed to establish a roadmap to facilitate sustainable electricity trade between Europe's internal energy market and North Africa (Ibid.). This process has continued to evolve, culminating in the 2022 EU-Morocco Green Partnership. Under this framework, the "Green Energy" program promotes regulatory reforms to open Morocco's electricity market and enhance its integration with Europe's network (IEMed, 2023).

The Global Gateway's push for hydrogen production coincides with intensified pressure from international financial institutions (IFI) to accelerate privatisation in Morocco (Bretton Woods Project, 2023). For example, in 2023, Morocco secured a $1.32 billion IMF loan for a program focusing on reforming the electricity market, including the unbundling of Morocco's state-owned electricity sector (Ibid.).

The process of liberalisation and privatisation had already begun in the second half of the 1990s due to the structural adjustment programs imposed by international finance institutions, and it also extended to the renewable energy sector in 2010 (TNI, 2021b). According to the Transnational Institute's report *"The Moroccan energy sector: A permanent dependence"* (2021), this process has led to many private production concessions, which largely benefited many European transnational companies, such as the French Engie, and the German Siemens[5]. But this is not the only criticality: **strategic decisions are increasingly made without democratic oversight** while, at the same time, **taxpayers and consumers shoulder the costs of privatised gains and socialised risks.**

Green investments driven by financial gains risk having a negative impact on human rights and the environment, as safeguards are not priorities, but rather profit. As highlighted by Common Wealth, only a public authority guided by the public interest, can effectively balance economic, environmental, and social goals (Common Wealth, 2024). The Global Gateway's energy investments in Morocco risk deepening these issues, as they continue to promote and fund private sector involvement in the country throughout the value chain of green hydrogen and its derivatives. For instance, the project for the construction of a PtX hydrogen reference plant is structured as a PPP. However, as highlighted by Counter Balance and Eurodad's report (2024), **PPPs often fail to ensure adequate public consultation and participation, while contract negotiations tend to be opaque and lack proper accountability**.

Additionally, PPPs frequently are proven to be **more costly than public-public financing**, sometimes resulting in expenses that are up to 30% higher. These types of partnerships are not a viable solution for developing countries: they create **heavy debt burdens**, and expose local populations to costly service fees (Eurodad, 2022), while often **lacking the implementation of a robust process for Free, Prior,**

5 The German Siemens, which joined with Spanish Gamesa in 2017 to form Siemens Gamesa Renewable Energy, is now part of Siemens Energy after the full acquisition of Siemens Gamesa in 2022.

and Informed Consent (FPIC) to protect the rights of impacted indigenous communities. One cautionary tale is the Ouarzazate solar power plant, developed through a PPP and backed by a significant €77.5 million EIB's loan (African Development Bank, 2019). Since its launch in 2016, the project has consistently faced an annual deficit of approximately €80 million, a shortfall that is covered by public funds (Hamoucene & Sandwell, 2023).

Although Morocco has invested heavily in renewables, challenges persist. While renewables account for almost all of Morocco's domestic electricity production — with the largest share originating from biofuels and waste (58.3%) and wind and solar (37.5%) as key resources — they still meet **only 10% of Morocco's energy needs** (IEA, 2022). In fact, looking at the data for total energy supply, Morocco is heavily reliant on coal imports (31.7% of the total) and oil imports (58% of the total) (Ibid.). This means that projects promoted by the Global Gateway aimed at producing green hydrogen and its derivatives, by **diverting renewable energy towards commercial or export purposes, fail to contribute to the country's energy transition and local access to renewable energy.**

This is particularly relevant given Morocco plans to allocate 10 terawatt-hours (TWh) of hydrogen production to the export market by 2030, while reserving only 4 TWh for the local market (GH2 webpage). Prioritising local electricity generation with renewables rather than hydrogen production, could cut Morocco's electricity emissions by 42% (Ricardo, 2023). Therefore, the Global Gateway strategy risks slowing down the decarbonisation of Morocco's power sector and undermining energy sovereignty (IEA, 2022).

Biofuels such as biogas can also have negative environmental impacts. This includes methane leakage, which causes large methane emissions from the biogas supply chain. According to Feedback Global, the amount of methane currently released relative to total biogas production is higher than for fossil gas – meaning that a unit of biogas is more polluting than a unit of fossil gas unless it is more tightly controlled. Moreover, financing of biogas production discourages effective climate change mitigation measures such as waste prevention.

Hydrogen: the latest green colonialist tool

Following Russia's invasion of Ukraine, replacing fossil gas with hydrogen from renewables is set to be a key plank of the European Commission's strategy and, as previously examined (Counter Balance & Eurodad, 2024) the Global Gateway is no exception.
The approach is problematic on different levels: first and foremost, it does not address the problem it claims to solve. As almost all current hydrogen production is fossil and the prospects for an increase of renewable hydrogen are small, the current hype around hydrogen risks deepening dependence on fossil gas, extending the life of polluting gas projects and benefiting from EU and national public money (Friends of the Earth Europe, 2024).

Despite the many projects in the pipeline, these plans risk stalling or failing to deliver meaningful progress toward decarbonisation. Hydrogen remains an expensive, inefficient, and energy-intensive solution that reinforces a centralised energy model similar to fossil fuels, ultimately benefiting a handful of large corporations.
At the same time, hydrogen-related projects risk undermining local access to affordable renewable energy, as resources will be diverted to hydrogen production for export. This adds up to a wide list of devastating impacts on human rights, communities, and the ecosystems due to the high demand for land, water and other inputs for hydrogen production.

The Global Gateway's strategy - investing in renewable energy production for green hydrogen largely destined for European consumption - places it squarely within the logic of green colonialism. As Hamouchene & Sandwell define it,:

"the extension of the colonial relations of plunder and dispossession […] to the green era of renewable energies, with the accompanying displacement of socio-environmental costs onto peripheral countries and communities, prioritising the energy needs of one region of the world over another" (Hamouchene & Sandwell, 2023, p. 30).

By prioritising Europe's energy security over the needs and sovereignty of African partner countries, the Global Gateway risks actively undermining local energy transitions — repeating colonial patterns of extraction and dispossession under a new, "green" banner (Hamouchene & Sandwell, 2023).

Hydrogen and its impact on ecosystems

Green hydrogen production projects require considerable amounts of water and land, often creating a major impact for the livelihoods of n farmers, pastoralists and local communities (Agriculture and Rural Convention 2020, 2024). This raises concerns that the EU's strategy of investing in export-oriented green hydrogen production in Morocco diverts key resources from agriculture, households and local industries. In the one million hectares of public land dedicated to green hydrogen projects (Reuters, 2024), it is estimated that 92 million cubic meters of water will be used to meet planned green hydrogen outputs (TNI, 2023). **Morocco is already facing high water stress,** ranking 27th in the WRI's national water stress ranking (Water Resources Institute, 2023). Redirecting scarce land and water resources toward green hydrogen production risks exacerbating social instability, especially in regions where access to these essentials is already precarious (MENA Fem & Greenpeace MENA, 2025).

The Moroccan government plans to respond to the issue of water scarcity with the construction of desalination plants for green hydrogen production (Lapresse, 2023). The country signed different investment agreements with European companies, including the deal between Morocco's phosphate and fertiliser giant OCP and the French energy firm Engie, to respond to these needs (Reuters, 2024c).

Yet, **desalination technologies are not a viable solution** to the country's water crisis. These technologies are highly energy-intensive, costly to build and maintain, and dependent on specialised infrastructure (TNI, 2023). When powered by fossil fuels, their environmental footprint worsens, while brine discharge threatens marine ecosystems (Hydrogen Insight, 2024). While desalination is considered a way to support renewable energy projects, using the produced water for hydrogen exports instead of addressing domestic water needs is deeply problematic.

A stark example of these dynamics can be seen in the Noor Midelt solar complex (Hamoucene and Sandwell, 2023). Funded by institutions such as the EIB, the French Development Agency (AFD), and Germany's KfW, and operated by the French company EDF Renewables, the solar complex is set to occupy a 4,141-hectare of central Morocco's Haute Moulouya Plateau.

Of this area, approximately 2,714 hectares are classified as communal or collective land, traditionally managed by three agrarian ethnic communities: Ait Oufella, Ait Rahou Ouali, and Ait Massoud Ouali. The remaining 1,427 hectares, designated as forest land, are also currently overseen by these communities. This land has been seized from its traditional owners through national legislation that permits expropriation under the pretext of serving the public interest.

Despite widespread local protests, the project continues, severely affecting local communities. The transhumant tribe of Sidi Ayad, dependent on this land for centuries, faces disruptions to its way of life, while water scarcity in the vulnerable Drâa-Tafilalet region worsens, threatening livelihoods. Women from the Soulaliyate movement are also demanding their right to land and fair compensation for the loss of ancestral territories. Given these precedents, there is strong concern that the Global Gateway's investments and projects in Morocco may involve land made available by the government through the **expropriation of local communities' land**, with all the associated social and environmental issues.

Another promise of the Global Gateway and related initiatives is that hydrogen investments will create "innovative, sustainable job creation", as stated in the Green Partnership on Energy. Morocco - a rapidly growing country of nearly 38 million people with a 9% unemployment rate and youth unemployment reaching 22.3% (WB, 2023; 2023b; 2023c) - might see little real benefits. While renewable energy megaprojects require significant capital and generate jobs during construction, these **jobs are mostly short-term** (TNI, 2023). In the long run, only a handful of technical roles are maintained and, often, these positions are filled by workers from outside the region, as they require specialised qualifications that local workers often lack (Ibid.).

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Moreover, foreign investors' pressure pushed for a reform of the Labour Code, leading to a scenario where the new jobs created through their funding are often outsourced and subcontracted, undermining workers' rights, job security, and fair wages (Ibid.).

The Global Gateway's focus on PtX projects — producing also **green ammonia and green methanol** — exacerbates these challenges. Morocco imports 1.8 million tons of grey ammonia produced from natural gas every year to supply nitrogen for its fertilizers (Statista, 2021). Consequently, one objective of its Green Hydrogen Roadmap has been to establish local, hydrogen-based ammonia production to reduce emissions (GH2 webpage). However, many initiatives within this framework, such as the partnership with Irish Fusion Fuel, Greek Consolidated Contractors Company, and Dutch Vitol, are geared towards European export markets (CEO & TNI, 2022).

Morocco's port agency ANP has issued a tender for a study to convert the Atlantic Port of Tan Tan into a green hydrogen export hub, aiming to facilitate the export of green hydrogen and its derivatives, including ammonia and methanol (The North African Post, 2024).

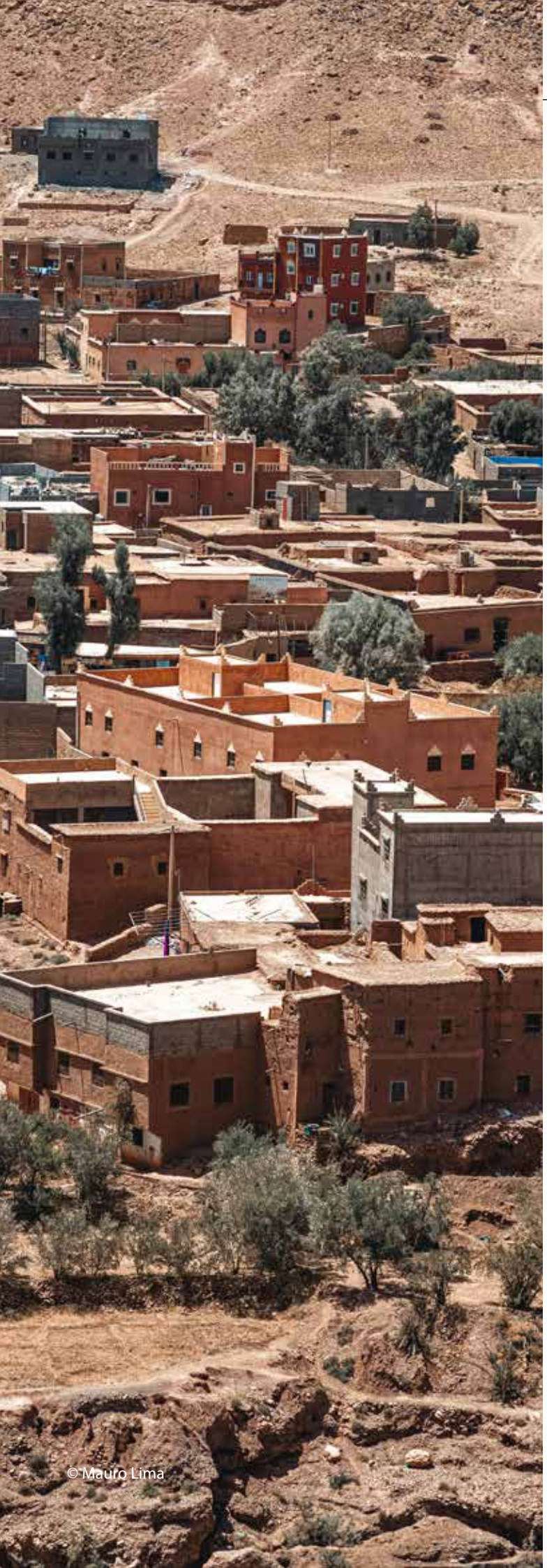
Betting heavily on unproven hydrogen technologies is risky, especially when reliable alternatives such as the direct use of renewable energies are already available and more cost-effective.

Hydrogen derivatives: ammonia and methanol

The environmental footprint of hydrogen depends heavily on how it is produced. The vast majority of hydrogen produced today—around 99%—comes from fossil fuels (Friends of the Earth Europe, 2024). This includes grey hydrogen, made from natural gas and responsible for high CO_2 emissions, and blue hydrogen, which still relies on fossil gas and depends on unproven and expensive carbon capture and storage (CCS) technologies to reduce its climate impact (Ibid.). Only a tiny fraction—less than 1%—is green hydrogen, made using renewable electricity (Ibid.). And even this "clean" option is far from neutral: green hydrogen production is highly energy-intensive, requiring large amounts of renewable electricity that could be better used to directly power homes, public transport, or industry. Hydrogen can serve as a base for the synthesis of other energy carriers, such as ammonia and methanol, often called "hydrogen derivatives", promoted as alternative fuels, particularly in shipping and industry. Ammonia is made by combining green hydrogen with nitrogen from the air, while methanol is produced from the combination of green hydrogen and captured CO_2 (CEO & TNI, 2022).

But just like hydrogen itself, they are only as clean as the hydrogen used to make them. If fossil-based hydrogen is used—as is currently the norm—these fuels are far from green.

Green ammonia is nearly twice as expensive as grey ammonia, and highly toxic, making its maritime transport hazardous. Similarly, green methanol is about five times more expensive than conventional shipping fuels due to its high production costs and lower energy density, which is roughly half that of diesel or bunker fuel, limiting its utility or competitiveness.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The exploitation of Western Sahara: a violation of international law

Another key concern relates to the use of land and resources belonging to the Saharawi people in the occupied Western Sahara**.** Morocco already exploits this territory to boost its energy output: **by 2030, energy from Western Sahara could account for 47.20% of Morocco's total wind capacity and 32.64% of its solar capacity** (WSRW, 2021).

This directly violates international law: the UN recognises the Sahrawi people's right to self-determination (Security Council Resolution 690, 1991) and the International Court of Justice stated that Morocco had no sovereignty over the territory, while the Sahrawi people had the right to self-determination and, therefore, independence (International Court of Justice, 1975). Furthermore, the Court of Justice of the European Union ruled in 2016 that EU-Morocco trade agreements do not apply to Western Sahara without the consent of the Sahrawi people, as the territory is not an integral part of Morocco (Court of Justice of the European Union, 2016).

The Global Gateway's hydrogen investments, if they involve resource extraction from Western Sahara, would therefore entrench violations of international law and fuel further injustice against the Sahrawi people.

Since 1975, Morocco has illegally occupied parts of Western Sahara, forcibly displacing the Sahrawi population, implementing settler colonial policies, and using forced disappearances and the torture of prisoners of conscience to suppress dissent (TNI, 2021).

The Polisario Front, representing the Sahrawi people, denounced Morocco's exploitation of Western Sahara's wind and solar energy, asserting that these **projects serve foreign interests while violating international law by ignoring Sahrawi rights and consent** (Climate Home News, 2021).

These projects serve a dual purpose.

On the one hand, they are used to **create new dependencies outside of Morocco on energy** that is at least partially sourced from Western Sahara. In fact, Western Sahara is connected to Morocco's electricity grid via an interconnection in the region's capital, El Aaiun. Morocco's National Office for Electricity (ONEE) has shortlisted five multinational companies, including Germany's Siemens Energy, for a 3 GW power line project to transfer energy from occupied Western Sahara to Morocco, linking Dakhla in the occupied territories to Casablanca (WSRW, 2024). These infrastructure projects aim to export energy to West African and European countries, increasing their reliance on energy from the occupied territories, while using this dependency as diplomatic leverage to gain support for the illegal occupation (TNI, 2021).

Morocco is already interconnected with the European grid through two cables with Spain, and a third is underway after the signing of a MoU in 2019 (PV Magazine, 2019). As a result, renewable energy from occupied Western Sahara risks being integrated into European markets. On the other hand, **Morocco's control over the energy system in the occupied territories is used to support resource exploitation and oppress local communities.** Power outages are used to conceal military operations or suppress protests, while local population face unjustified, exorbitant energy bills (TNI, 2021).

Concerns over the use of occupied Western Sahara's resources for Global Gateway projects are heightened by Morocco's active promotion of green hydrogen production in the territory, often involving European multinational companies. For example, Nareva, a company owned by the Moroccan monarchy, has partnered with the German multinational Siemens, later succeeded by the Spanish Siemens Gamesa, to develop wind farms in the occupied Western Sahara (ibid.).

These partnerships have recently expanded into the field of green hydrogen and its derivatives. The Moroccan government selected five international consortia as part of its "Moroccan offer" to develop the green hydrogen production sector in the occupied territories of Western Sahara, with notable European companies such as Acciona (Spain), Moeve (Spain), and Nordex (Germany) (Hydrogen Central, 2025). Moreover, French energy firm Engie may develop a green hydrogen project in occupied Western Sahara after signing a joint development agreement with Office Chérifien des Phosphates, a major Moroccan phosphate producer, in 2024 (WSRW, 2025). This would not be Engie's first involvement in the area, as it previously partnered with Nareva in 2018 to build a wind-powered desalination plant (Ibid.). Other French multinational companies are also involved in green hydrogen projects in the occupied territories, such as HDF Energy (WSRW, 2023) and MGH Energy, which plans to produce e-methanol and e-jet for distribution in Moroccan and European markets (WSRW, 2025b).

In this context, **the Global Gateway's green hydrogen supply chain in Morocco risks directly or indirectly promoting resource exploitation in occupied Western Sahara**, contradicting the European Court of Justice's ruling **(**C-104/16, 2016) that no EU-Morocco agreements can apply to the territory without the consent of the Sahrawi people. By sourcing green hydrogen and derivatives from the region, the EU risks legitimising Morocco's illegal occupation, while deepening dependence on resources obtained in violation of international law.

In conclusion, the projects promoted by the Global Gateway in Morocco raise significant concerns. They further contribute to the liberalisation and privatisation of Morocco's energy market, including through approaches like PPPs, which, while generating private profits, increase costs for consumers and the public sector, reducing public control over the energy system.

Moreover, these projects redirect renewable energy toward commercial and export markets, neglecting local energy needs, while also driving large-scale land and water appropriation that harms communities and the environment. Finally, they may directly or indirectly contribute to the exploitation of Western Sahara's resources and the oppression of the Saharawi people, ultimately serving European interests and benefiting energy companies.

TUNISIA

WIRED FOR EXPORT

The energy cooperation between the EU and Tunisia is politically grounded in the **2023 MoU on a global partnership.** In the energy sector, the partnership prioritises the development of renewable energy, the production of green hydrogen, including its derivatives such as ammonia, and its integration into the EU value chain to meet both domestic needs and international demand (EC, 2023g).

The MoU also mentions the shared objective of ensuring greater security of energy production and supply, emphasising Tunisia's significant potential for renewable energy generation. The partnership is presented as a means to support Tunisia's green growth, create new jobs, enhance energy supply security, and provide low-carbon energy for local needs at competitive prices (Ibid.). It also encourages public sector investments through guarantees and a regulatory framework designed to attract investment. A key objective is to develop infrastructure and regulations enabling the export of Tunisia's renewable energy and related products to the EU.

The first flagship project of the Global Gateway in Tunisia is the **ELMED electricity interconnector**, announced in 2023. This 600 MW 200 km undersea high-voltage cable will connect Italy and Tunisia (EC, 2023h; EIB, 2024) and it has been developed jointly by Italy's (TERNA) and Tunisia's (STEG) grid operators. The €850 million project is currently under construction, aiming to be operational by 2028 (EIB, 2024). Its stated aim is to facilitate renewable energy exports from Tunisia to the EU and to strengthen energy security on both shores of the Mediterranean (EC, 2023g; EIB Group, 2024). Team Europe has committed a total of €472.6 million to finance the project (EIB, 2024), including **€307.6 million from the CEF and €125 million in loans from the EIB, EBRD, and KfW, guaranteed by Tunisia** (Ibid.; EBRD, 2023). An additional €27 million grant under the Neighbourhood Investment Platform was allocated to support its implementation: the EU approved funding the dispatch centre upgrade, technical oversight for STEG, and social-environmental studies to align regulatory frameworks between Italian and Tunisian grids for efficient interconnector operation (EIB, 2024). In addition to European support, the **World Bank Group has granted a loan of $268.4 million** to the Tunisian government to help finance the project, with the aim to partially cover the overall investment needed for the construction of a main converter station and related substations on the Tunisian territories, as well as provide support for the implementation of the interconnector (WBG, 2023d).

Map of ELMED electricty intereconnector, source: Terna (2021)

A second Global Gateway initiative, announced in 2024, focuses on a 1.7 Gigawatt (GW) renewable energy program aimed at financing the building of approximately 100 km of transmission lines for private renewable energy developers (Council of the EU, 2023). This initiative aligns with Tunisia's concession tender targeting 1700 MW over the period 2023-2025, of which 650 megawatt (MW) should be financed by the EBRD (Ibid.; Enerdata, 2023).

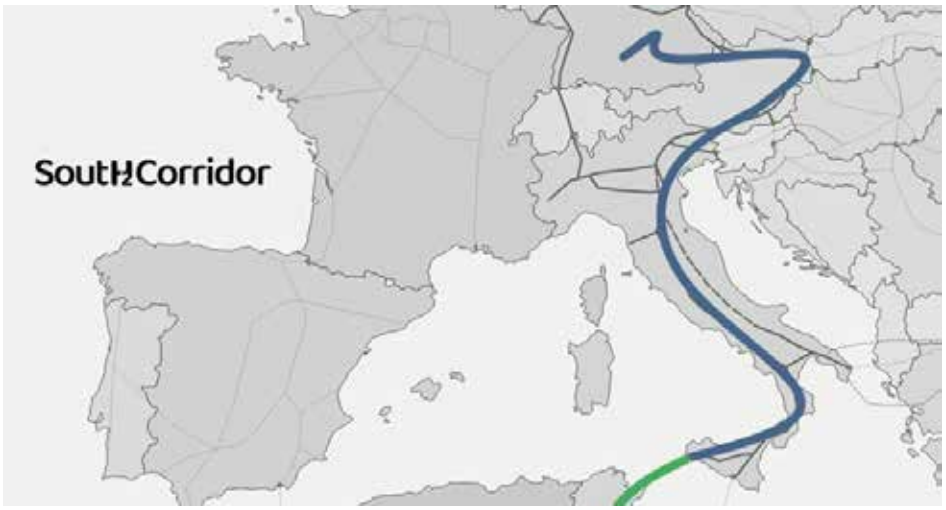
The EBRD has committed up to €25 million for the construction and operation of 60 MW two solar photovoltaic power plants in Tozeur and Sidi Bouzid, developed by the Norwegian company Scatec and Aeolus, part of Toyota (EBRD, 2024). Additionally, the Tunisian Ministry of Industry, Mines, and Energy has approved development licenses for four solar PV projects across the country, with a total capacity of 500 MW (Enerdata, 2025).

Among these, the French company Qair International will construct a 100 MW solar farm in the Kasr region of Gafsa province, along with a 200 MW facility in Al-Khabna, Sidi Bouzid. Similarly, another French corporate, the developer Voltalia, has been awarded a 100 MW solar project in Gabès (Ibid.). The latest project involves another 120 MW solar power plant in Sidi Bouzid built by a consortium between Scatec and Aeolus (Scatec, 2025).

The **Southern Hydrogen Corridor (SouthH$_2$ Corridor)** has been designated as a flagship project for 2025. It is a large-scale infrastructure initiative aimed at facilitating hydrogen transport from North Africa to Europe through a dedicated 3,300 km pipeline, linking Algeria and Tunisia to Sicily as the main entry point into the EU, before extending across Italy and reaching Austria and Germany (SoutH2 Corridor webpage).

The plan foresees a partnership with Algeria, with the stated goal of delivering cost-competitive renewable hydrogen to the EU and enhancing energy system integration with North African countries (Council of the EU, 2024; EC, 2025e). The pipeline is expected to carry up to 4 million tonnes of hydrogen per year, accounting for 40% of the EU's hydrogen import target by 2030 (Rinnovabili, 2024). In this project, Italy would act as connecting part between the two shores of the Mediterranean: the project is a cornerstone of the Mattei Plan, widely promoted by Italian Meloni's government, which aims to position the country not only as a gas hub, but also as a key hydrogen one in the region (ReCommon, 2024).

The European leg of the corridor was added to the sixth Projects of Common Interest (PCI) list in 2023 as "Hydrogen Corridor Italy-Austria-Germany" and as part of the European Hydrogen Backbone (SoutH2 Corridor, 2023). Currently, the project is being developed by European transmission system operators, namely Snam (Italy), Trans Austria Gasleitung (TAG) and Gas Connect Austria (GCA) (Austria), and Bayernets (Germany) (Ibid.). The initiative aims to repurpose over 70% of existing midstream infrastructure for hydrogen transport, integrating new hydrogen-dedicated segments, with strong political and industrial backing, making PMI status for the Tunisia-Italy connection likely by the end of 2025 (Ibid.).



Map of South H2 Corridor,
source: United World International (2023)

Another major project is the **Medlink,** also set as a 2025 Global Gateway's flagship initiative**,** which involves large-scale renewable energy generation in Tunisia and Algeria, with the stated aim to decarbonise the energy sectors of North Africa and the EU (Council of the EU, 2024).

The project aims to develop large-scale renewable energy generation, including solar PV, wind, and battery storage systems, along with dedicated transmission infrastructure such as subsea interconnectors linking Algeria and Tunisia to Europe via Italy, with the electricity transmitted to Tuscany and Liguria (Ibid.; Bloomberg, 2024). Medlink benefits from European support: it is included in the ENTSO-E long-term plan for the EU's power transmission operators and is also part of Meloni's Piano Mattei initiative.

The initiative recently secured over €100 million in funding for its startup phase, and it is developed by Zhero, a company founded by former executives of gas network operator Snam (Bloomberg, 2024). Despite these investments, the project requires approximately €5 billion for full completion, with development costs expected to be covered by future electricity consumers (Enterprise, 2024) - €60 million from funders including Azimut, Baker Hughes, TotalEnergies, and UniCredit (Ibid.). TotalEnergies could further enhance its involvement, as it has signed with Zhero Europe a preliminary agreement for a minority stake in Medlink Tunisia (Ibid.). When fully operational in 2030, the project could supply 8% of Italy's electricity needs, with up to 10 GW of installed capacity generating 28 terawatt-hours (TWh) annually.

It is clear from the MoU and the GG flagship projects that the EU's objectives in the country mainly concern the export of renewable energy and green hydrogen from Tunisia. This goal is supported by the drive to liberalise further the Tunisian energy market, promoting European private multinationals for the production of energy in the country and the construction of national infrastructures necessary for export.

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Development impacts and emerging risks

Tunisia's shift to renewable energy and the privatisation of the sector began with the 2013 law **allowing private actors to generate electricity from renewables** (TNI, 2024). This legislation was heavily shaped by lobbying efforts from foreign organisations and IFIs, with the German Development Agency (GIZ) playing a leading role. In fact, GIZ heavily shaped Tunisia's energy transition policies by conducting research and drafting legislative recommendations favouring a privatised energy model (Hamoucene & Sandwell, 2023).

In 2015, two new laws were introduced to further promote private sector involvement in energy production. The first was the *Solar Plan*, which sought to mobilise approximately €8 billion in investments between 2015 and 2030, with the government expecting to secure two-thirds of the funding from private, predominantly foreign sources (TNI, 2024). The second was Law No. 2015-12-17, which opened Tunisia's power grid to private companies, allowing them to generate electricity primarily for domestic consumption and export (Hamoucene & Sandwell, 2023).

These **reforms entrenched a dominant model based on foreign investment and private profit, leaving Tunisian citizens to bear the costs.** The EU's active push for market liberalisation seeks to align the country's regulatory framework with European standards, negotiated as part of the Deep and Comprehensive Free Trade Agreement. Yet, this push for liberalisation risks undermining Tunisia's regulatory autonomy, handing over control to European investors and reshaping energy systems to serve EU security and perpetuating green colonialism, instead of contributing to Tunisian energy sovereignty (Ibid.).

Green Colonialism in Action

The Global Gateway's projects—including Medlink, ELMED, and the SoutH2 Corridor—fit into this process of privatising the Tunisian energy market.

In the case of the Medlink project, it is even expected to be financed by various private actors driven by a profit-oriented logic, which could undermine the project's long-term sustainability and raise serious concerns if public funds are also used to support it. In particular, **TotalEnergies' role as a financier and likely investor is problematic**. The company's 2024 investment strategy prioritises shareholder redistribution and oil and gas activities—still expected to account for more than 80% of its energy mix by 2030—to the detriment of climate solutions. This includes the development of new fossil fuel extraction and infrastructure, such as LNG, often at the expense of local communities and ecosystems[6] (Reclaim Finance, 2024; Greenpeace, 2024).

Another relevant example is the 1.7 GW renewable energy program, which includes plans to build 100 km of transmission lines. This task has been handed over to private energy developers—further contributing to the privatisation of critical energy infrastructure. Such an approach risks driving up costs, weakening public oversight, and prioritises profits over long-term sustainability and equitable energy access.

This initiative is closely linked to Tunisia's tender scheme for the development of new renewable energy capacity, part of which should be financed by the EBRD. As seen in other cases, such as the financial support granted to Scatec and Aeolus, this funding facilitates the entry of rich countries' private companies into the Tunisian energy market and the renewable energy export business. These **dynamics sideline local businesses**: they often lack the scale or capacity to design, implement and maintain large-scale renewable projects, while Tunisia's renewable energy manufacturing sector remains underdeveloped and incapable of supporting major

6 As seen in the LNG projects in Cabo Delgado, Mozambique, TotalEnergies is placing both the local population and government at significant financial risk amounting to billions, while also hindering the nation's progress toward energy transition and sustainable development (Friends of the Earth Europe, 2024b).

projects (Hamoucene & Sandwell, 2023). With skills gaps and an underdeveloped manufacturing sector, local companies are excluded from the new energy economy (Ibid.). In short: foreign firms profit, while Tunisia bears the cost.

Fossil-fuelled exports in a renewable disguise

Officially, ELMED interconnection will boost energy security on both sides of the Mediterranean, but numbers do not add up. In 2022, Tunisia generated 95.8% of electricity from natural gas (IEA, 2022b). This means that, once operational in 2028, **energy transmitted through the ELMED will likely come from fossil fuels.**

Although the Tunisian Solar Plan sets a target of 35% renewable electricity by 2030 (Global Forum on Sustainable Energy), this will not be enough to create a renewable electricity surplus for export without detriment to local access to renewable energy and the national energy transition. Tunisia is highly dependent on energy imports. In 2021, it imported nearly half its gas from Algeria (TNI, 2024). For this reason, directing renewable energy produced in Tunisia for export is far from improving the country's energy security, as it keeps Tunisia in a position of energy dependency from third countries.

What's more, a 2024 EuroMeSCo study finds ELMED will generate very few long-term jobs, while increasing debt and straining Tunisia's foreign currency reserves (EuroMesco, 2024).
According to estimates, out of 300 semi-skilled or unskilled construction workers, only 25 to 30 are estimated to remain in the long term and will likely be hired at a regional or national level more than local.

While the project is primarily financed through concessional and standard loans to facilitate implementation, in the long-run this approach will **deepen Tunisia's debt burden** and place sustained pressure on its limited foreign currency reserves. Moreover, the project is intended to support Tunisia to balance seasonal electricity demand by exporting surplus energy during the winter and importing electricity from Europe in the summer to cover consumption peaks.

However, since imported electricity must be paid for in foreign currency and at European market prices, the resulting costs could offset any export gains and ultimately lead to higher electricity prices for households. The project management by Italy's partially public company Terna also raises concerns. According to ReCommon, while the company appears to play a dominant role in shaping national energy policy, the bulk of its accumulated profits has largely benefited shareholders (ReCommon, 2021). This poses a significant challenge to achieving the energy transition, as Terna holds a monopoly in Italy over both the management and investment in the sector. Its dominance mirrors the broader trend of public-private hybrids that consolidate control without accountability, raising further concerns about its role in the ELMED project.

Europe's hydrogen hopes - Tunisian sacrifice

The SoutH2 Corridor is another emblematic Gateway project. It exemplifies the EU and Italy's push for green hydrogen — regardless of the social and environmental costs in "partner" countries. Similar to previous reforms in the energy sector, GIZ supported Tunisia to develop its **National Green Hydrogen Strategy**, which was launched in 2024 (GH2 webpage2). The plan aims at creating a solid regulatory framework to support the growth of the sector, opening the gates to private investments[7] and fostering trade with European countries[8].

The country's ambitious plan aims to produce 8.3 million tonnes of green hydrogen and its derivatives annually by 2050, with 2.3 million tonnes dedicated to domestic use and 6 million tonnes for export (Ibid.).

7 Among the most prominent companies benefitting from this strategy, there are the French TotalEnergies, EREN Groupe, and HDF Energy, the Austrian Verbund, the Belgian DEME, the Norwegian Aker Horizons and the Irish Amarenco (Ireland) (GH2 webpage2)

8 The key areas of the Tunisian strategy include defining "green hydrogen" in line with European standards, establishing incentives to attract investment, revising gas pipeline regulations to allow for hydrogen transport, and setting up special economic zones for the production of hydrogen and its derivatives (GH2 webpage2).

This plan is accompanied by the signing of several MoUs with European energy companies for green hydrogen and derivative production projects in the country, with the clear goal of making them available for export to Europe.

Yet, Tunisia will bear the environmental and social consequences of providing its natural resources for green hydrogen production. Meeting **the country's green hydrogen production goals by 2050 would require an energy supply approximately 15 times greater than Tunisia's current total power capacity** (TNI, 2024b).

To reach its renewable energy production targets, Tunisia plans to allocate over 500,000 hectares of land—around 3% of the country's total area—for such projects (Ministry of Industry, Energy and Mines and GIZ, 2023). This land will be either confiscated to communities, as seen in the case of Segdoud in Gafsa, or, in the form of state-owned properties, will be offered to investors (Ibid.).

Similarly, these projects will impact water resources: desalination plants will work with a capacity equivalent to the annual water usage of 400,000 people, in a country already grappling with recurrent droughts and growing struggles to supply its population with drinking water (Ibid.). These challenges come on top of existing environmental strains linked to the export of water-intensive agricultural products for European and Western markets, a situation likely to worsen as farmland is increasingly repurposed for energy infrastructure, further exacerbating Tunisia's agricultural crisis (Ibid.).

Given Tunisia's heavy energy dependence and its significant 50% energy deficit (World Bank Blogs, 2023), it is concerning that the EU strategy appears more focused on exploiting the country's renewable energy potential to produce green hydrogen and its derivatives for export, rather than addressing Tunisia's domestic energy needs.

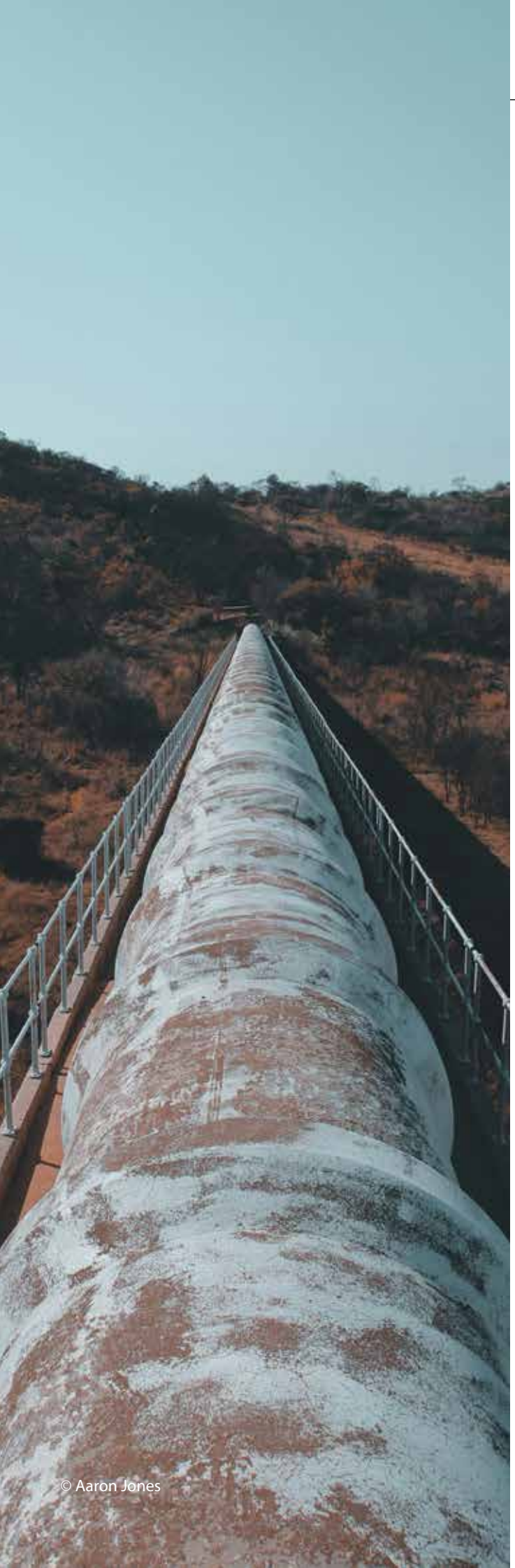
An analysis of Tunisia's green hydrogen plans indicates that the country is **unlikely to be ready to export significant volumes by the time the pipeline becomes operational in 2030** (Climate Home News, 2025). This could also open the **possibility for a portion of hydrogen produced from fossil fuels to be transported through the SoutH2 Corridor.**

In addition, the European segment of the project is being developed by European transmission system operators Snam (Italy), which will also take part in the segment with Tunisia, Trans Austria Gasleitung (TAG) and Gas Connect Austria (GCA) (Austria), and Bayernets (Germany), aiming to support the creation of a hydrogen network to connect southern Europe and central Europe to export energy from north Africa.

Snam will play a key role in developing the Italian Hydrogen Backbone, which is expected to consist of around 70% repurposed existing gas pipelines, with an estimated cost of €4 billion, which could be financed by public subsidies (Recommon, 2024).

In light of this data, according to Recommon, **hydrogen represents a new opportunity for fossil fuel giants** like Snam to extend the life of existing infrastructure under a greener guise, while effectively maintaining the traditional extractive model. Moreover, IEEFA raised doubts about Snam's alignment with the Paris Agreement, noting a disconnect between its promotion of low-carbon gas transport and its limited efforts to reduce downstream emissions. Indeed, while the company promotes its gas infrastructure as "hydrogen ready," many of these initiatives are unlikely to satisfy EU climate standards (IEEFA, 2025). Snam locks in future fossil fuel emissions by continuing to invest in fossil infrastructure, which may be driven by the potential to increase profits through the expansion of these assets, which are projected to grow steadily until 2029 (Ibid.).

The other companies involved are no exception to the **broader trend among major fossil fuel corporations to greenwash gas and to lobby to extend the life of fossil infrastructure** (Greenpeace, 2023).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To shift attention away from the climate impact of their operations, fossil fuel companies heavily invest in marketing their renewable energy efforts, while also promoting unproven technologies like hydrogen (Greenpeace, 2023b). For example, Bayernets presents natural gas as a key element for climate protection and energy transition, while framing hydrogen as a key building block in the future energy system (Bayernets webpage1 and 2). Similarly, GCA promotes natural gas as an ideal partner for renewable energy with a promising future (Gas Connect Austria webpage), while TAG highlights its investments in renewable energy initiatives like hydrogen, while continuing to expand its natural gas transport operations (TAG webpage).

In this context, the fact that these companies may also receive public funding is worrisome because they are the same fossil fuel corporations that have spent years lobbying to maintain the profitability of their infrastructure in a post-carbon world (Counter Balance, 2025).
Their efforts have proven successful, as the SouthH2 Corridor has been fast-tracked as a PCI and is likely to soon be designated a PMI, unlocking access to billions in EU funding and loans. Additionally, it enables Snam and its partners to secure EU public funding through the CEF, thereby strengthening the financial and political backing for this initiative (Ibid.).

In conclusion, the Global Gateway projects in Tunisia promote the privatisation of the Tunisian energy market, turning it into a business opportunity for European companies. Furthermore, these investments prioritise energy export projects, including green hydrogen, rather than addressing Tunisia's domestic energy needs, effectively exploiting the country's resources and remaining locked into fossil fuel dependency.

EGYPT

AN ENERGY CRISIS REPACKAGED

The cooperation between the EU and Egypt has intensified in recent years. Within the framework of the **2004 Association Agreement**, the two parties updated their partnership priorities for 2017–2020 with a strong focus on diversifying energy sources—particularly renewables and energy efficiency. The partnership renewed its emphasis on natural gas, given the recent offshore gas discoveries in Egypt and the EU's search for alternative supply routes (General Secretariat of the Council, 2017). These priorities were reaffirmed in the signing of the 2018 MoU on a Strategic Partnership on Energy, which also includes continued European support for reforms in the electricity sector aimed at greater liberalisation and privatisation (EC, 2018).

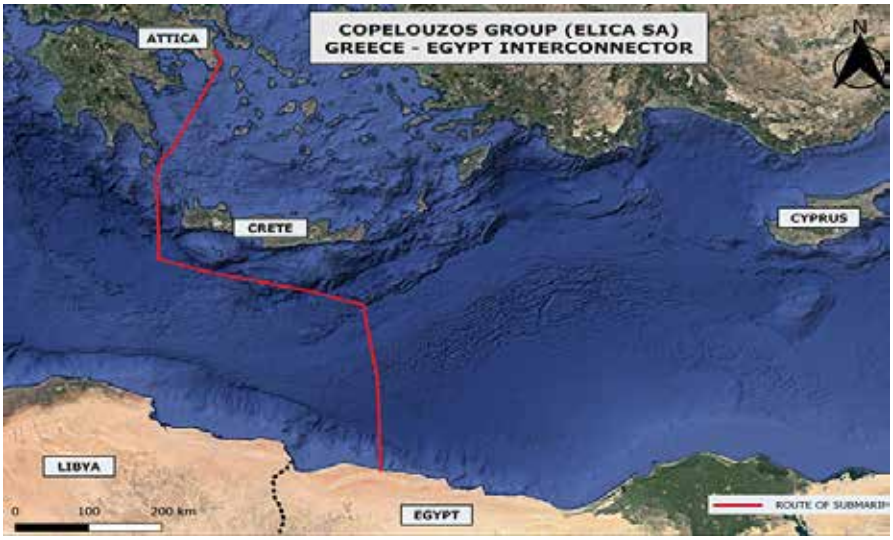
In 2022, **two additional MoUs** were signed with Egypt regarding energy, taking advantage of COP27 in Sharm el-Sheikh to "step up cooperation on the clean energy transition" (EC, 2022h). Under the REPowerEU plan and in response to the energy crisis the EU signed an MoU with Egypt and Israel for a partnership aimed at "enabling a stable delivery of natural gas" to Europe and boosting European investments in natural gas exploration and production (EC, 2022i). The second MoU, signed during COP27, concerns a strategic partnership on renewable hydrogen, based on the provision of European support to develop the production, consumption, and trade of renewable hydrogen and its derivatives in Egypt, with the goal of exporting it to the EU (EC, 2022l).

In 2022, the **EU-Egypt Partnership Priorities** were updated for the period 2021–2027, highlighting three key areas of cooperation: renewable energy, gas collaboration, and the implementation of "mutually beneficial" energy projects such as infrastructure for cross-border interconnections (General Secretariat of the Council, 2022). Other areas of focus include a gradual transition towards low-carbon and sustainable modes of transport, across land, maritime shipping, and civil aviation. Building on these priorities, in 2024 the EU and Egypt decided to elevate their cooperation to the level of a Strategic and Comprehensive partnership, with energy at its core. As part of this partnership, a €7.4 billion financial and investment support package was announced for Egypt for the period 2024–2027. This includes funding from the Southern Neighbourhood Economic and Investment Plan, targeting projects such as energy interconnections, the renewable hydrogen industry, renewable energy production, and energy efficiency (EC, 2024e).

This political framework underpins several Global Gateway flagship projects in the energy sector in Egypt. One prominent example is the **GREGY project,** a high voltage electrical interconnection passing from Egypt to Greece, spearheaded by Elica Mediterranean Interconnection S.M.S.A, a company within the Copelouzos Group (EC, 2023h; Copelouzos Group webpage).

The initiative has garnered strong backing not only from Greece and Egypt, but also from the Commission, which included the initiative under the 6th list of PCI and PMI (Copelouzos Group webpage), potentially qualifying the project for grants up to 50% of the construction cost. With an estimated budget of €3.569 billion (Tovima.com, 2025; GREGY Interconnector webpage), a final investment decision is expected by 2026, with operations to begin in 2030 (Tovima.com, 2025).

Egypt's transmission operator, EETC, is in talks to join the project with a MoU with Copelouzos and Greek grid operator IPTO, each holding a 33.3% stake (Energy Press, 2025). Once operational, the interconnector is expected to transfer 3,000 megawatts of electricity—claimed



Map of GREGY prooject
source: Copelouzos Group

to be 100% produced from renewables—to Europe, replacing approximately 4.5 billion cubic meters of gas and reducing CO_2 emissions by around 10 million tonnes annually (Copelouzos Group webpage).

Originally, Egypt was to provide 9.5 GW of photovoltaic energy for this purpose, however the focus has shifted, with 75% of capacity now expected from wind and 25% from solar, aligning with Greece's night-time energy needs (Balkan Green Energy News, 2024).

Copelouzos Group aims to mobilise up to €8 billion in investments through an international consortium, and is exploring joint projects with Infinity Power—a joint venture between the United Arab Emirates' energy company UAE's company Masdar and Egypt's Infinity—to build renewable energy capacity to feed into the interconnector (Tovima.com, 2025; Power Magazine, 2023).

The transmitted electricity will be roughly divided in three: one third will be consumed in Greece, one exported to neighbouring EU countries, and one used in Greece for green hydrogen production, most of which will also be exported to nearby EU markets (Copelouzos Group webpage).

Other Global Gateway projects in Egypt focus on energy efficiency. One of these projects involves the **modernisation of the Alexandria Area Control Centre**, responsible for managing air traffic in the region (EC, 2023h). The building will be renovated to meet energy performance goals, adapting substations, and ensuring a stable electricity supply for 9 million inhabitants, supported with €50 million from AFD and €10 million in EU grants (AFD, 2024).

Another is the **Green and Sustainable Industries Programme,** which will provide concessional loans and grants to private and public companies as an incentive to invest in energy efficiency and increased use of renewable energy, clean hydrogen and biogas (Council of the European Union, 2023; EIB, 2024b). The programme combines €135 million financing provided by EIB Global, a €30 million EU grant and additional funding from the AFD, aiming to unlock nearly €271 million in low-carbon investments (EIB, 2024b).

Renewable hydrogen production also features heavily. One flagship project focuses on producing hydrogen and its derivatives, in particular **methanol for green shipping** (EC, 2023h; EC, 2024f). This follows the 2022 MoU on hydrogen and informs the 2024 Egypt's National Low-Carbon Hydrogen Strategy, which aims to scale hydrogen output, promote sectoral uptake and position Egypt as a global hydrogen hub by harnessing the country's abundant solar and wind resources (GH2 webpage3). Following this strategy, and under more conservative estimates, Egypt intends to produce 1.5 million tonnes of green hydrogen per year by 2030—1.4 million tonnes would be exported—and 5.8 million tonnes by 2040, with 3.75 million tonnes for export (Ibid).

Egypt is also one of the target countries for Global Gateway's **Sustainable Aviation Fuels (SAFS)**, part of an umbrella initiative designed to support the global development, production, and use of sustainable aviation fuels, contributing to the achievement of International Civil Aviation Organisation's goal of net-zero emissions in international aviation by 2050 (Council of the EU, 2023). This flagship will also support achieving the objectives of the ReFuelEU Regulation of 2023 in order to promote the use of Sustainable Aviation Fuels (European Parliament and Council of the EU, 2023).

Another key initiative is the **Nexus for Food Water and Energy (NWFE),** launched in 2022, to support green projects across sectors, including food, water and energy with the Electricity Grid Reinforcement Project (EC, 2025e). Its energy pillar, the **Energy Wealth Initiative**—developed by Egypt in partnership with the EBRD—aims to retire 5,000 MW of inefficient gas-fired power and replace it with 10,000 MW of renewable capacity (EC, 2022h).

Under NWFE, the EBRD will provide a €170 million sovereign loan for the Electricity Grid Reinforcement Project. The loan will be on-lent to EETC to upgrade a 500 kV substation in Cairo and construct a 200 km high-voltage line to transmit 2.1 GW of wind energy from the Gulf of Suez (EBRD, 2024b).

This complements other EBRD-backed wind projects in the Gulf of Suez. Under the NWFE initiative's **10 GW renewable energy program**, the EBRD issued a loan of up to US$ 100 million for the development, construction, and operation of a 500 MW onshore wind farm in the region (EBRD, 2023b).

The loan has been awarded to Red Sea Wind Energy, a joint-stock company based in Egypt that is backed by a consortium of private sponsors, including: Engie, Orascom Construction, Toyota Tsusho Corporation, and Eurus Energy. A further $21.3 million loan is earmarked for a 150 MW extension of the project (EBRD, 2024d). The EBRD is also providing a long-term loan of up to €60.5 million from its own funds, along with €3.2 million from the Green Climate Fund, to support the development and construction of a 200 MW onshore wind farm in Ras Ghareb (EBRD, 2024b). The project is developed and managed by Masdar IPH Wind S.A.E., a special purpose vehicle jointly owned by Masdar (51%) and Infinity Energy (49%), fostering the private sector involvement in Egypt's energy sector (Early Warning System webpage).

In short, Global Gateway's energy strategy in Egypt focuses on promoting interconnection to export renewable energy to Europe, enhancing energy efficiency, supporting the development of a green hydrogen industry geared towards export, upgrading the grid to improve transmission capacity, and fostering private sector participation in renewable energy production.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The Global Gateway is accelerating the privatisation of Egypt's energy sector, channeling public funds to European and other foreign private companies. These investments allow corporations to control key national infrastructure and deepen their entrance in Egypt's energy sector -often at the expense of local communities, the environment and public sovereignty.

Energy reforms, IMF style

The privatisation and liberalisation of the Egyptian energy market began in the 1990s, following the external debt crisis and the subsequent pressure and financial support to reform the sector by the IMF, the World Bank, the African Development Bank, European development banks and export credit agencies (TNI, 2022). It intensified after the 2014 energy crisis, which led to new reforms aimed at boosting electricity production, including from renewable sources (Ibid.). Following the 2018 MoU on a Strategic Partnership on Energy, Egypt began receiving European support, including from the EBRD, to further liberalise and privatise the electricity sector (EC, 2018; EBRD webpage).

One example is the GREGY Interconnector, part of the Global Gateway. The project is led by the Greek corporation Copelouzos, which is responsible for its construction via Elica Mediterranean Interconnection S.M. S.A. This company has shown its intention to neglect environmental safeguards and local concerns (Kythira Wind Turbines webpage). In a previous project on the island of Kythira, Copelouzos was forced to withdraw its wind farm proposal after sustained local protests and legal battles over their environmental and tourism-related impacts (Kythira Wind Turbines webpage2; Kythira Wind Turbine webpage3).

Similarly, under the 10 GW renewable energy program, the EBRD is financing several private companies for the construction of wind farms, including Red Sea Wind Energy, which is partially owned by the French company Engie.

Critics of Engie highlight that it is **one of the highest-emitting utilities in Europe,** a leading developer of gas power plants globally and in LNG, with an incomplete transition strategy and a record of environmental and human rights abuses (Reclaim Finance, 2023; Eco-Business, 2020; TNI, 2023b).

Despite the renewable energy branding, **Egypt's electricity exports through GREGY are likely to rely on fossil fuels.** In 2022, Egypt's electricity generation mix was dominated by natural gas (79.2%) and oil (8.6%), while renewable sources—hydro, wind, and solar—accounted for approximately 12% (IEA, 2022c). At the same time, over 70% of total final energy consumption came from fossil fuels, primarily oil and natural gas, with electricity representing 23.6% and the remainder—less than 6%—coming from biofuels and waste (Ibid.). It is highly likely that the exported electricity will come from fossil fuels, while new renewable energy resources will not benefit the local population or contribute to the decarbonisation of Egypt's energy system.

Power cut and broken promises

These contradictions are stark given **Egypt's recurring electricity shortages and blackouts** in recent years, particularly during the summer months when energy demand peaks (EuroMeSCo, 2024). In 2024, the government extended daily power outages to three hours in response to a sharp rise in electricity consumption caused by a heatwave (Reuters, 2024d).

Egypt's ambitions to scale up renewables by the time the interconnection project becomes operational in 2030 are likely to fall short. The Integrated Sustainable Energy Strategy 2035 (ISES 2035) could not reach its target of generating 20% of electricity from renewable sources by 2022 (REGlobal, 2021). The Egypt Vision 2030 reacted by setting a new goal to reach 42% of electricity to come from renewables by 2035 (Government of Egypt, 2023), which remains highly ambitious: **Egypt has a weak national grid that cannot accommodate large-scale renewable integration**, and faces severe financial constraints due to high public debt and limited fiscal space (Atlantic Council, 2025).

The extractive hydrogen agenda

The development of renewables is also related to an extractive approach, fueled by Global Gateway's backing of Egypt's hydrogen economy. Not only is there a high risk that overly ambitious renewables targets will lead to fossil fuel based hydrogen, but also that it will **divert renewable electricity for export to Europe**, rather than promoting local economic development and sovereignty by serving local communities or supporting the decarbonisation of the national energy system.

Despite Egypt's technical expertise in green hydrogen production, its strategy **lacks a clear roadmap for fostering domestic manufacturing and assembly** across the hydrogen value chain and omits key performance indicators to measure progress toward local capacity-building (Alternative Policy Solutions, 2024). Opportunities such as the development of local electrolyser manufacturing remain unaddressed, and there is little evidence that local companies will benefit meaningfully from the planned investments (Ibid.). Furthermore, by prioritising hydrogen exports to Europe, these strategies neglect the significant logistical and financial burden of long-distance hydrogen transport—which can cost up to three times more than production (IEA, 2019).

Thirsty for power

The Global Gateway's support for renewable hydrogen production in Egypt—primarily aimed at export—risks placing **additional strain on already scarce local resources such as water and land.**

Egypt faces a critical and growing water scarcity crisis, with an annual deficit of approximately seven billion cubic metres and projections indicating severe shortages by 2025—when global water scarcity is expected to affect 1.8 billion people (UNICEF, 2021).

Given that over 33% of the population was employed in the agriculture and agrifood sectors as of 2021 (FAO, 2021), any worsening of this crisis could have severe social and economic repercussions, particularly for rural livelihoods. Moreover, Egypt's plans to build new desalination plants do not offer a viable solution to the country's water crisis, as these technologies are highly energy-intensive—especially problematic when powered by fossil fuels—costly to build and maintain, and environmentally harmful (Enterprise, 2023; TNI, 2023b; Hydrogen Insight, 2024).

Additionally, the Egyptian government has designated approximately 41,700 square kilometers (km^2) to the New and Renewable Energy Authority (NREA) for the expansion of renewable energy initiatives aimed at green hydrogen production (Renewables Now, 2024).

This occurs in a context where small-scale farmers and agricultural workers frequently struggle to compete for land and resources against large agribusinesses that control vast amounts of land, resulting in higher poverty levels, displacement, and social unrest (MENA Fem & Greenpeace MENA, 2025).

These challenges are further intensified by current plans to **produce hydrogen derivatives**, particularly green methanol for the shipping industry. Green methanol is not only toxic, but it also has just half the energy density of conventional bunker fuel and may cost up to five times more (TNI, 2022b). A flagship MoU signed in 2022 between A.P. Moller-Maersk, a member of the Global Gateway Business Advisory Group, and Egyptian authorities laid the groundwork for large-scale green fuel production in the Suez Canal Economic Zone (EC, 2023n; Renewables Now, 2023). But the project—led by Maersk's subsidiary C2X—has already faced delays and, with green methanol in short supply, Maersk's new vessels are running on LNG or conventional fuels (ShippingWatch, 2024).

Flying on fumes

The inclusion of Egypt among the partner countries in the **Sustainable Aviation Fuels (SAFs)** initiative presents challenges on several fronts.

Despite growing investment and public subsidies, SAFs remain far from a viable large-scale alternative to kerosene, because they have negative environmental impacts and are not sufficiently available to be scaled up, leaving a limited scope for reducing emissions, and contribute more to greenwashing than strong climate action (Greenpeace, 2022).

Egypt's SAF production, meant to help meet the EU's ReFuelEU mandate, paves the way for exporting SAF produced in Egypt to Europe, but potentially leaves Egypt to bear the cost of the resources consumed in the process.

The EU's ReFuelEU mandate requires a 2% SAF blend in aviation fuel from 2025 and is expected to drive a 216% year-on-year increase in European SAF consumption, reaching 1.9 million tons (Enterprise, 2025). However, **Europe's current SAF supply chain is not equipped to meet this surge in demand**, with emerging producers like Egypt's ECHEM, still in early development stages (Ibid.).

To support this effort, Egypt is launching a new platform to collect waste cooking oil from the private sector, enabling the production of HEFA (Hydroprocessed Esters and Fatty Acids), —a type of sustainable aviation fuel derived from bio-oils, animal fats, and recycled oils (Enterprise, 2025; IBA, 2023). Yet, the availability of waste fats, oils, and greases is limited. To expand production, there is growing pressure to include crop-based oils (e.g. palm oil), which are linked to deforestation, land grabbing, and indirect land-use change (ILUC)—all of which undermine climate goals (Transport & Environment, 2024; IBA, 2023).

HEFA-based SAFs offer limited greenhouse gas reductions—especially when feedstock origin and full life-cycle emissions are considered. They fall short of delivering the deep decarbonisation aviation needs: this emerging industry risks deepening environmental injustice rather than promoting a just transition (EASA, 2019).

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UKRAINE

RECONSTRUCTION WITHOUT TRANSITION

The energy partnership between the EU and Ukraine is long standing. In 2011, Ukraine joined the **Energy Community**, aimed at extending the EU's internal energy market principles and rules beyond its borders (EPRS, 2025). More broadly, EU-Ukraine relations are governed by the 2014 Association Agreement, which reiterates Ukraine's commitment to the Energy Community Treaty for greater integration of energy markets. The agreement also outlined shared goals to promote energy efficiency, the use of renewable energy sources, and the safety of nuclear installations (Official Journal of the EU, 2014).

Building on this, the EU and Ukraine signed a new **MoU on a strategic energy partnership in 2016**, updating their original agreement of 2006. The MoU sets out a joint ambition for full integration of their energy markets, and closer cooperation to reform Ukraine's energy sector, advance its decarbonisation, and complete market design aligned with EU rules and practices (EU, EAEC & Ukraine, 2016).

Following Russia's 2022 invasion and the subsequent extensive destruction of its energy infrastructure, EU-Ukraine cooperation intensified, politically and financially. In 2023, the EU and Ukraine signed a new MoU specifically focusing on biomethane, hydrogen, and other synthetic gases. Referring to the REPowerEU Plan, it underlines the need for both parties to diversify their energy imports to decrease dependence on Russia and boost domestic energy production through efficiency measures, renewables, and nuclear energy (EC, 2023i).

A major milestone came in November 2023, when ENTSO-E announced the full synchronisation of the Ukrainian power grid with that of continental Europe, following Ukrenergo's fulfilment of key technical conditions required for a stable, long-term interconnection (ENTSO-E, 2023). A month later, Ukrenergo, the state-owned electricity operator, officially became a member of ENTSO-E (Ibid.).

A key instrument of EU support is the **Ukraine Facility,** launched in March 2024 and active through 2027. It provides up to €50 billion in stable and predictable financial aid (EC webpage 3), reflecting the EU's strong commitment to Ukraine's resilience, sustainable development, and a progress towards EU membership (Ibid.). Its first pillar, the **Ukraine Plan**, outlines a comprehensive reform and investment strategy covering 15 key areas, including energy and the green transition (EC, 2024g). Developed jointly by the Ukrainian government, the Plan enables the release of up to €32 billion in grants and loans to support the reforms and investments (Ibid).

The second pillar, the **Ukraine Investment Framework,** mobilises €9.3 billion in guarantees and grants to unlock up to €40 billion in public and private investments for Ukraine's recovery and reconstruction, in collaboration with EU Member States, the Ukrainian government, and international financial institutions such as the EIB, EBRD, and KfW (EC, 2024h). One of its three key investment areas is support for the energy sector, which includes repairs to critical electricity infrastructure, increasing energy generation capacity, and promoting investment in renewable energy (Ibid).

At least 20% of the total funding allocated for investments under the Ukraine Plan and support through the Ukraine Investment Framework have to contribute to climate change mitigation and adaptation, environmental protection and the green transition (EC webpage3).

Complementing this is the **Ukraine Energy Support Fund (UESF)**, established with the agreement of the

EC and the Ukrainian Ministry of Energy, to reconstruct damaged and critical energy infrastructure (Energy Community webpage).

Managed by the Energy Community Secretariat, the Fund allows governments, international financial institutions, organisations, and corporate donors to channel financial assistance to Ukraine's energy sector, focusing on the most urgent needs of its energy companies (Ibid). It has now surpassed €1 billion in pledges from 30 donors (Energy Community, 2024).

Several European development banks have launched energy initiatives in Ukraine. In 2022, the EIB created the **"EU for Ukraine Initiative"** to address the country's urgent needs and help maintain economic stability until the Ukraine Facility is established. As part of this effort, the EU for Ukraine Fund (EU4U Fund) was set up (EIB, 2023).

In October 2024, the EIB unveiled the **Ukraine Energy Rescue Plan** to expand EU support and reinforce Ukraine's critically damaged infrastructure, while promoting alignment with EU standards and furthering the country's path toward EU integration (EIB, 2024c).

Through this initiative, the EIB plans to provide up to €600 million in financing for urgent energy projects in both the public and private sectors, backed by the EU's Ukraine Facility and partially supported by the EIB's EU for Ukraine Fund (Ibid).

As an initial step, the EIB has allocated an €86 million EU-guaranteed loan to Ukrenergo for the construction of protective anti-drone structures to safeguard critical grid infrastructure during wartime (EIB, 2024d). In addition, a €16.5 million grant from the German government will support the integration of renewable energy systems, such as solar panels, into public buildings renovated under EIB municipal loans (EIB, 2025), improving energy efficiency and resilience during blackouts.

Further support includes the €10 million EU-guaranteed loan under the EIB's Ukraine Solidarity Urgent Response package, financing energy efficiency upgrades at 16 universities across the country (EIB, 2024e).

Efforts of the EIB are complemented by additional financial support provided by the EBRD. In 2022, the latter approved a sovereign-guaranteed loan of up to €300 million to Ukrenergo, split equally between emergency equipment procurement and capital structure support, backed in part by a US-funded guarantee and a €70.6 million grant from the Netherlands (EBRD, 2022).

An additional €150 million loan is being prepared to strengthen Ukrenergo's capital base (Ibid). Germany's KfW has been supporting Ukrenergo from 2022, focusing on the repair, protection and energy-efficient reconstruction of the energy infrastructure damaged by the Russian war of aggression, as well as its integration into the EU transmission network (KfW, 2024). This partnership totals €450 million in funding, provided partly as loans and partly as grants: 74 million from KfW, €249 million from the Federal Ministry for Economic Cooperation and Development (BMZ), and €127 million from the EU (Ibid; Minister of Finance of Ukraine, 2022; KfW, 2023).

The **Global Gateway is another framework through which the EU seeks to contribute to the reconstruction and development of the Ukrainian energy system**. In 2024, its flagship project in Ukraine was launched to assist Ukrenergo and others in repairing and strengthening generation and grid infrastructure (Council of the EU, 2023). The initiative prioritises improved flexibility, increased renewable capacity, and stronger cross-border connections with ENTSO-E countries—key for both energy security and a future green transition (Council of the EU, 2024). It also includes a focus on skills development, workforce inclusion—especially of women and war veterans—and the upgrading of training systems to international standards (Ibid).

Another 2024 project targets buildings' energy efficiency, aiming to enhance Ukraine's energy independence, reduce waste, and cut household costs (Council of the EU, 2023). These projects lack further information: they are likely supported via the Ukraine Facility and implemented through EU development finance partners, particularly the EIB.

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Development impacts and emerging risks

Before Russia's full-scale invasion, Ukraine's energy supply was heavily reliant on fossil fuels—coal (21.7%), oil (18.6%), and natural gas (25.1%)—while electricity generation was dominated by nuclear power (54.7%), with a small but growing share from renewables (IEA, 2022d).

Since February 2022, Russia has systematically targeted Ukraine's energy infrastructure, causing widespread damage to generation, transmission, and distribution networks.

By mid-2024, only around one-third of Ukraine's pre-war electricity generation capacity remained intact (IEA, 2024). Rolling blackouts are now common, especially in the most affected regions, with serious consequences for daily life—particularly during winter months, when unstable heating and water supplies risk triggering further displacement.

In this context, a climate-resilient and secure reconstruction must prioritise the shift away from fossil fuels, strengthen energy efficiency, and accelerate the deployment of decentralised renewable energy sources (Bankwatch, 2023).

Despite the loss of key energy infrastructure to Russian forces, Ukraine's renewable energy sector remains resilient: in 2023, renewables still accounted for 8.7% of Ukraine's energy mix, slightly below the levels of 2021 (9.4%) in 2021 (EUISS, 2025).

A decentralised energy system— based on multiple small-scale, locally distributed sources—offers several advantages. It increases the overall efficiency of the power system as energy is produced closer to its consumption, it also decreases energy losses in transmission, is less vulnerable to grid outages and often a much more economical solution in rural areas. In Ukraine's situation of military conflict, it is also more resilient to attacks, faster to deploy, and less reliant on high-risk infrastructure (see for more information EUISS, 2025).

While the Global Gateway's portfolio in Ukraine focuses on rebuilding energy infrastructure and promoting efficiency, there is a glaring gap in dedicated support for new renewable generation.

According to Greenpeace, **just 1% of Ukraine's suitable land for wind and solar could cover the country's entire electricity demand** (Teske & Miyake, 2024). However, within the Ukraine Investment Framework, only one energy-related project specifically mentions the construction of new wind power facilities, offering the private sector €350 million in guarantees (EC, 2024h). Similarly, KfW and the EBRD are currently involved in a single solar project, the first post-invasion private energy deal, led by German firm Goldbeck Solar (EBRD, 2024e; KfW, 2024b). Announced in 2024, the EIB's "Ukraine Green Recovery Fund I" remains under appraisal: the fund includes a loan of at least €20 million to support large-scale renewable energy projects, particularly onshore wind (EIB, 2024f; Early Warning System webpage).

This fragmented approach highlights the urgent need for more coherent, targeted support for renewable energy deployment. Energy efficiency and grid repair are vital, but without a major push for new renewable capacity, Ukraine risks falling short of both energy security and climate goals—even as the war drags on.

Issues of transparency

At the same time, there are growing concerns about transparency and compliance with environmental and social safeguards in Global Gateway-funded projects. A Bankwatch fact-finding mission in July 2024 flagged **irregularities in EIB-funded projects,** particularly in the procurement and contractor selection (Bankwatch, 2024).

One of the main concerns is that the urgency and scale of investment needed for Ukraine's reconstruction could lead to a lowering of environmental standards (Euronews, 2023).

One of the first examples is the Commission's analytical report of 2023 on the future enlargement, which highlights the urgent need for Ukraine to align with the EU acquis and the Green Deal provisions (EC, 2023l).

Recent legal amendments allow reconstruction activities to bypass Environmental Impact Assessments (EIAs) and Strategic Environmental Assessments (SEAs), weakening accountability at a critical stage (Bankwatch, 2023b).

Even within flagship projects, safeguards are being waived. The EBRD €300 million loan to Ukrenergo for transmission grid repair has granted a derogation from its Environmental and Social Policy due to the conflict, limiting oversight (Bankwatch, 2023).

Enforcement of the EIB's environmental and social standards has become increasingly difficult, as it is entrusted to Ukraine's Ministry of Infrastructure and the UNDP, yet both actors face serious challenges (Bankwatch, 2024).

The Ministry's role in overseeing standards and project selection remains opaque, while UNDP's capacity to provide technical assistance and monitoring is uncertain (Ibid). This situation is also made possible by the EIB's own weak due diligence systems, which does not require the Bank to make their own impact assessments (Bankwatch & FIDH, 2024).

The normative base of false green solutions

The Global Gateway could in future also finance projects aimed at producing and exporting biomethane and hydrogen, or actions to enhance nuclear power generation.

On the Ukrainian side, the National Recovery Plan Blueprint, announced in 2022, clearly outlines goals to **expand nuclear capacity** and **uranium extraction** from


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local reserves, to develop the production of **biofuels** (including biomethane), and to build **hydrogen** transport infrastructure connecting production sites with domestic and EU consumers (National Recovery Council, 2022). Ukraine's 2023 Energy Strategy to 2050 lists nuclear energy expansion among its main objectives for decarbonising its energy sector (Enerdata, 2023).

Similarly, this commitment is included in the Ukraine Facility Plan, which underpins EU financial support and prioritises investment in new nuclear capacity and continued development of uranium mining (Ukraine Facility Plan, 2024).

Another key reference is the draft National Energy and Climate Plan (NECP) 2025–2030, prepared with the Energy Community Secretariat in the context of Ukraine's EU accession process. In the Energy Security chapter, the plan states that "Ukraine's energy sector during the period 2025–2030 will develop in the direction of meeting the needs of the EU, particularly in natural gas, biomethane, and hydrogen" (Energy Community, 2024b, p.19)—indicating that investments in these sectors are geared primarily toward export.

Additional concerns arise: first, Ukraine's nuclear sector—including uranium extraction—is being actively developed; second, hydrogen production projects may fall short of EU sustainability criteria for green hydrogen (Ibid).

As part of the broader EU-Ukraine energy partnership, a 2023 MoU was signed on biomethane, hydrogen, and synthetic gases. It emphasises Ukraine's need to increase the production of biomethane and hydrogen, while also recognising nuclear energy's role in the energy mix (EC, 2023i). It explicitly promotes the export of "renewable gases" to the EU, leveraging Ukraine's well-developed gas infrastructure, storage facilities, and interconnections (Ibid).

Biomethane and hydrogen

The focus on producing biomethane and hydrogen for export does little to address Ukraine's urgent energy needs—such as system decentralisation and a just energy transition—and risks diverting substantial national and European funds toward sectors with significant environmental and social impacts. Often marketed as "renewable gas" to boost their green credentials, hydrogen is frequently produced from fossil fuels, while biomethane, derived from organic sources, functions like fossil gas in terms of emissions.

Due to methane leaks in the supply change, **biomethane may release more methane per unit into the atmosphere than conventional fossil gas** (Feedback EU, 2023). It also emits CO_2 when burned, which can escape through pipelines and similar infrastructure just like conventional natural gas (Counter Balance, 2020).

While using untreated waste as feedstock can reduce emissions, producing biomethane from dedicated or sequential crops generates additional methane, making even minimal leaks environmentally significant (Feedback EU, 2023).

Furthermore, the rising value of manure as feedstock incentivises large-scale farming, fuelling the growth of "energy pigs," "energy cows," or "energy chickens" in already polluting farming systems (Ibid). Export-oriented biomethane production could push Ukraine to scale up its output to meet EU demand—triggering risks like land grabbing, deforestation, and food-fuel competition, particularly in exporting countries (Counter Balance, 2020).

Similarly, Ukraine's **hydrogen plans—largely reliant on fossil fuels—pose major climate risks**. As stated in the NECP 2025–2030, Ukraine does not anticipate the production of green hydrogen. The aim of exporting it to Europe further raises concerns, as it could divert resources away from local needs, potentially causing serious social impacts, particularly in the agricultural sector, while failing to contribute meaningfully to the transformation of Ukraine's energy system.

These export ambitions also risk locking in the use of Ukraine's vast gas transmission infrastructure—whether for biomethane or hydrogen—contradicting the country's stated objective to decentralise its energy system.


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Nuclear investments

New nuclear investments run counter to Ukraine's goals of decentralising its energy system. Given Ukraine's urgent need for fast, resilient post-war solutions, decentralised renewables, energy efficiency, and grid flexibility are better suited to the task. Additionally, **nuclear power remains prohibitively expensive when compared to renewables**, costing nearly four times more than onshore wind (Schneider et al., 2023). These figures do not even account for hidden costs such as decommissioning plants or managing radioactive waste, which add further financial and environmental burdens (CAN Europe, 2024). This is particularly concerning if new investments in nuclear power generation divert funding away from the development of new renewable energy capacities.

Another crucial concern is the **safety of nuclear facilities.** In Ukraine's case, the military conflict further heightens the potential for nuclear accidents, raising serious questions about the long-term viability of nuclear energy in such contexts (Euronews, 2025). Most of the Ukrainian reactors were commissioned in the 1980s and are nearing the end of their expected 40-year lifespan; 12 were slated for decommissioning in 2020 but remain operational (Greenreport, 2022). Aging infrastructure is increasingly prone to accidents and malfunctions, and safety upgrades may not always be implemented: this is the case of two reactors at the Rivne plant, actively functioning without any safety improvements (Bellona, 2020).

These risks are compounded by the goal in **Ukraine's strategy to expand domestic uranium extraction.** This is an alarming prospect given that uranium mining has historically led to severe environmental and health impacts due to weak regulation and a focus on production over safety (OECD & NEA, 2014). Ukraine's NECP includes the **deployment of Small Modular Reactors (SMRs)** for nuclear power generation. These unproven technologies are costly, untested at scale, and may bring increased radioactive waste and proliferation risks (CAN Europe, 2024). Industry claims about SMR efficiency and construction timelines remain speculative at best (IEEFA, 2022).

CONCLUSIONS

The analysis of Global Gateway energy partnerships reveals a troubling pattern: in most of the countries analysed, except for Albaniaand Ukraine as far as current reconstruction of energy systems is concerned, Global Gateway projects primarily serve European geopolitical and economic interests rather than addressing the national and local energy needs of partner countries.

The development of infrastructure aimed at exporting renewable energy to Europe often hinders partner countries from advancing their own energy transitions, limits local populations' access to green and affordable energy, and prevents the achievement of energy security at the national level. While framed as support for a global energy transition, these projects often prioritise infrastructure for exporting renewable energy to Europe, sidelining efforts to build inclusive, resilient, and sovereign energy systems in the countries where they are located.

This export-driven model risks deepening energy inequality. It limits access to green and affordable energy for local populations, slows national progress toward energy security and decarbonisation, and diverts public and private resources away from domestic needs. Instead of supporting decentralised, community-led energy solutions, Global Gateway financing often goes to large-scale renewable energy plants that can lead to land grabbing, environmental degradation, and social conflict.

The EU's promotion of green hydrogen and its derivatives in Morocco and Tunisia further exemplify this extractivist approach, a form of green colonialism. These projects are designed almost entirely for export and rely on massive inputs of land and water resources already under severe stress in these countries. The use of public land and the risk of displacement or dispossession for rural communities undermine local livelihoods, particularly those dependent on agriculture.

Moreover, as seen in the cases of Albania, Morocco, and Tunisia, Global Gateway projects are embedded in a broader agenda of the liberalisation and privatisation of the domestic energy market in partner countries.

This approach undermines democratic control over energy resources, weakens public oversight, and leaves strategic decisions in the sector in the hands of foreign investors and the private sector. The result is a system where the gains are privatised, while the costs —financial, environmental and societal—are borne by citizens, consumers and the public purse, exacerbating inequalities. Market-driven transition often prioritises financial returns over environmental sustainability and human rights.

The role of European companies and financial institutions in these projects also raises major concerns. In countries like Georgia, Israel, Morocco, and Tunisia, Global Gateway funds often end up in the hands of European public or private companies that do not promote decarbonisation goals and have a history of fossil fuel projects abroad with harmful impacts on local communities.

Public money is being used to subsidise infrastructure that facilitates new profit streams for these companies and perpetuates an extractivist model—often with limited benefits for the host countries, and sometimes with serious consequences for communities and ecosystems.

Even more concerning are Global Gateway projects that risk violating international law by supporting the extraction of natural resources in occupied territories. In both Israel and Morocco, there is evidence that EU-backed projects might facilitate or legitimise resource exploitation in the occupied territories of Palestine and Western Sahara—undermining the rights of the Palestinian and Saharawi peoples and entrenching the occupation.

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The Global Gateway's current approach on energy partnerships reveals a deeply asymmetric and unsustainable mode of cooperation.

Using public money to support Europe's decarbonisation while externalising the social and environmental costs to partner countries not only is unjust, but it is also incompatible with the EU's commitment to global climate justice. A genuine energy transition cannot be achieved at the expense of other countries, especially if the goal is truly to mitigate the threat of the climate crisis globally, it must be built on solidarity, equity and shared prosperity. That means starting from the national and local energy needs of partner countries, and working towards inclusive, democratic, truly sustainable energy systems that empower communities and protect the planet.

RECOMMENDATIONS

To deliver public investments abroad aligned with the principles of climate justice, the Commission and European and international development banks should:

Prioritise local needs: fund local projects that respond to the national and local energy needs of partner countries, ensuring universal access to renewable, sustainable and affordable energy, while genuinely advancing a just and inclusive energy transition, and local energy security.

Reject large-scale hydrogen-for-export projects: avoid financing green hydrogen production projects which diverts renewable energy capacity while local energy needs are not met. Green hydrogen is costly, transporting it results in high energy losses and only in very limited situations provides the most efficient solution for decarbonisation. Hydrogen production also puts pressure on vital resources - such as water and land - already scarce for local communities and agriculture.

Respect international law and human rights: cease funding projects, directly or indirectly, linked to the extraction and/or use of resources in the occupied territories of Palestine and Western Sahara, in line with international legal obligations and the rights of the affected populations.

Support responsible energy actors only: Channel public funding exclusively to energy companies that have robust, science-based decarbonisation plans, demonstrate genuine commitment to human rights and environmental protection, and do not profit from the exploitation of resources in partner countries.

Promote public ownership and democratic governance: invest in energy systems that are publicly owned and democratically controlled, helping countries to regain sovereignty over their energy sources. This would lower energy costs, support a just transition through a comprehensive policy-making, and accelerate the roll-out of renewable systems in ways that respect local ecosystems and people.

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Counter Balance

Challenging Public Investment Banks