



# STRENGTHENING JUST ENERGY TRANSITION PARTNERSHIPS (JETPS)

Lessons learned for a just energy transition

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## **Strengthening Just Energy Transition Partnerships (JETPs)**

Lessons learned for a just energy transition

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# ABBREVIATIONS

<b>CIPP</b>	The Comprehensive Investment and Policy Plan of Indonesia
<b>COP</b>	Conference of the Parties, UN Climate Change Conference
<b>CSO</b>	Civil society organisation
<b>GFANZ</b>	The Glasgow Financial Alliance for Net Zero
<b>GHG</b>	Greenhouse gas
<b>GCF</b>	Green Climate Fund
<b>ILO</b>	International Labour Organization
<b>IPG</b>	International Partners Group
<b>IPP</b>	Independent power producer
<b>JET IP</b>	The Just Energy Transition Investment Plan of South Africa
<b>JETP</b>	Just Energy Transition Partnership
<b>NDC</b>	Nationally Determined Contribution
<b>NGO</b>	Non-governmental organisation
<b>OECD</b>	Organisation for Economic Co-operation and Development
<b>PCC</b>	The Presidential Climate Commission of South Africa
<b>PCFTT</b>	Presidential Climate Finance Task Team of South Africa
<b>RMP</b>	The Resource Mobilisation Plan of Vietnam
<b>UNFCCC</b>	UN Framework Convention on Climate Change

# EXECUTIVE SUMMARY

Since the adoption of the Paris Agreement in 2015, few initiatives in global climate policy circles have generated as much excitement as Just Energy Transition Partnerships (JETPs). JETPs are novel international climate finance initiatives that aim to support a specific selection of heavily coal-dependent emerging economies to transition away from their reliance on coal, towards renewable energy, in a manner that leaves no one behind. JETPs aim to finance the energy transition in a way that protects and supports the livelihoods of vulnerable groups, such as low-income households or communities dependent on coal mining. Under these partnerships, the International Partners Group (IPG) – primarily composed of G7 countries – and international financial institutions have already committed to mobilising an initial amount of approximately US\$46.5 billion for four countries: South Africa, Indonesia, Vietnam and Senegal. The ambition is to extend the model to other countries in the future.

However, for JETPs to truly serve people and the planet, they must be safeguarded against corruption and governed with integrity. The energy sector has historically been highly susceptible to corruption, and these risks also exist in renewable energy markets. The substantial promises of funding directed towards JETPs further increase the risk of abuse of power by unscrupulous actors seeking personal gain. As a result, disadvantaged groups may disproportionately bear the negative impacts of energy transition or be excluded from the benefits of new renewable energy infrastructure development, as profits are diverted to corrupt individuals and businesses.

To better understand how corruption can undermine just energy transitions within JETPs, Transparency International's Climate Governance Integrity Programme conducted an analysis of JETP governance processes in the three initial JETP countries: South Africa, Indonesia and Vietnam. This report highlights the findings of this analysis based on official policy documents, studies and nine semi-structured interviews. It examines key barriers to a transparent, accountable and just energy transition through JETPs, and makes recommendations

on how to address these challenges using integrity measures.

The report's findings reveal that just energy transitions through JETPs risk being undermined by weak governance, insufficient public participation, underdeveloped oversight mechanisms, and a general lack of transparency in decision making, as well as in the management of JETP-related funds.

- Corruption is a major problem for the JETPs, as energy markets in the three JETP countries studied struggle with poor governance and a lack of transparency, as demonstrated in the report. Yet when the JETP governance plans were developed, national anti-corruption agencies, anti-corruption civil society organisations (CSOs) and experts were not involved in the planning process, and the risks of corruption, along with mitigation strategies, were not adequately assessed. Unless actors understand these risks and address them early on, the integrity of the JETP process could be undermined, leading to potential setbacks in achieving a just energy transition.
- JETP integrity can also be compromised by a lack of transparency surrounding political deals. Decision makers have often limited public access to information and conducted negotiations with donors behind closed doors. Although the background conditions in the three JETP countries examined differ, civil society actors and affected communities lacked timely and relevant information about the partnerships, including the vision for just transition and funding modalities. This has led to widespread scepticism about both JETPs and the broader energy transition process. A lack of transparency restricts various stakeholders' ability to identify governance risks and collaborate effectively to address integrity issues that may arise during the transition.
- Limited stakeholder inclusion can undermine public accountability within JETPs, making it difficult for communities to oversee and influence the just energy transition effectively. Although circumstances vary



across the three countries, it has been a common challenge to ensure meaningful stakeholder participation – especially during the development of JETP investment plans. In some instances, participation processes have been criticised as tokenistic, offering limited opportunities for meaningful participation by civil society and affected communities.

- Confidentiality surrounding details of financial deals poses another significant challenge, restricting citizens' ability to hold officials accountable for decisions made in the public interest. Throughout the development of JETP deals and plans, donors and governments have not ensured timely public access to information regarding financial details or associated conditions. The insufficient transparency in JETP financing modalities impairs the ability of citizens, CSOs, and national and global activist groups to monitor whether funds are used to promote a just transition, rather than serving the interests of a select few.
- An underdeveloped governance framework for JETP implementation risks jeopardising the integrity of a just energy transition by undermining coordination and oversight. The current frameworks involve numerous stakeholders, adding complexity that can create coordination challenges and communication gaps. Decision making process remains vague for non-state stakeholders, while reporting and monitoring processes are underdeveloped. In addition, little is known about how project-level integrity will be ensured or how projects funded under JETP will be safeguarded from corruption. Without clear governance mechanisms, achieving a just transition could be compromised by fragmented decision making. Assessing compliance with high-level JETP targets will also be challenging.
- Undue influence on JETPs from powerful companies and commercial interests can undermine equity and social justice, as projects serving narrow economic interests take precedence over those benefiting marginalised groups and society as a whole. The commercial approach taken by JETPs has faced widespread criticism. Stakeholders at all levels, from local to international – such as labour unions, CSOs and activists – have pointed out that donors, governments in JETP countries and investors prioritise marketability over considerations of social justice. Strong oversight by both the public and institutions will be necessary to ensure that justice-related aspects of agreements are not overlooked, and that governments do not co-opt processes merely to justify existing energy transition policies.

This report demonstrates how a lack of transparency, accountability and inclusivity in JETP processes can create opportunities for corrupt actors to exploit energy transitions. Such exploitation results in increased inequality, misallocated funds and worsened societal marginalisation – consequences that extend beyond specific JETP processes and impact global climate action efforts.

However, JETPs also offer a unique opportunity to reform one of the most corrupt sectors by establishing new standards of integrity while securing key climate and social benefits. This potential should serve as motivation for greater focus on preventing corruption and investing in building national institutions' capacity to ensure integrity in their operations. Based on the lessons learned, the report offers the following recommendations to unlock this potential.

## RECOMMENDATIONS:

### ADDRESSING CORRUPTION RISKS

- JETP governing bodies should ensure early and comprehensive assessment of corruption risks by involving national anti-corruption and oversight bodies, CSOs and experts.
- JETP governing bodies should adopt and implement best practice anti-corruption policies and procedures, introducing institutional accountability measures, to address systemic gaps that allow corruption to infiltrate the energy sector.
- JETP donors should ensure that JETP countries undertake a mandatory comprehensive corruption risk assessment and introduce appropriate and proportionate anti-corruption processes and accountability measures in response to identified risks.
- JETP governing bodies should publicise details of investigative procedures and sanctions in cases of corruption, and ensure that companies involved in corruption are prevented from bidding on JETP-related contracts.

### ENHANCING ACCESS TO INFORMATION

- JETP governing bodies must facilitate early, meaningful and inclusive multi-stakeholder engagement on the just transition, in particular involving civil society groups and communities from the regions most affected by coal phase-out, to reflect the different needs, expectations and interests associated with

the process, secure public support, and build equity and trust.

- JETP country governments should introduce policies and regulations to provide access to useful and timely information on decision making, including via transparent communication and engagement during negotiations for the JETP agreement.
- JETP donors should ensure that all key decision-making processes, documents and communications during JETP negotiations are made transparent, and are easily available and accessible to stakeholders in a timely manner.

### **ENSURING INCLUSIVE PARTICIPATION**

- JETP governing bodies should ensure continuous consultation with diverse stakeholder groups, giving special priority to the inclusion of women and Indigenous peoples, to enhance public accountability in the development of JETP plans. Stakeholders should have timely access to relevant documents and decisions, allowing them to provide informed feedback.
- JETP governing bodies should maintain open and transparent communication, clearly explaining which stakeholder feedback has been taken into consideration and providing justification for decisions. This will help foster trust and accountability throughout the process.
- JETP donors should enshrine robust standards related to integrity and civil society engagement in the agreements and investment plans. As early as possible in the process, they should invest in institutional capacity development on governance-related issues for key national bodies.

### **STRENGTHENING TRANSPARENCY**

- JETP donors should take a leading role in ensuring timely disclosure of information about the support provided under JETPs, including the nature of the support and any conditions attached. They should ensure full transparency regarding the allocation and use of JETP grants, clearly distinguishing between “new and additional” climate finance and pre-existing funds.
- JETP donors and JETP country governments should establish clear provisions for transparency and accountability regarding JETP-related debt, with specific monitoring and audit measures to ensure responsible management.

• JETP governing bodies should guarantee access to all JETP-related information on fund allocations, tendering decisions and related contracts.

- All financial partners and project implementers should proactively disclose to the public details of JETP-related funds and their use, to enhance accountability and trust.

### **BUILDING STRONG GOVERNANCE FRAMEWORKS**

- JETP governing bodies should establish clear, robust and inclusive governance structures, in which responsibilities and processes for decision making, oversight and coordination are transparent to all stakeholders.
- JETP governing bodies and project implementers should establish grievance mechanisms and policies and procedures that ensure the protection of environmental defenders and whistleblowers, to uphold integrity in JETP operations, at both national and project levels.
- JETP governing bodies and donors should encourage learning on governance issues through peer-to-peer exchange and experience sharing at global forums such as the G20, and in bilateral cooperation between current and potential JETP countries.
- JETP governing bodies should ensure that enough resources are allocated for coordination and oversight of all JETP activities, and for capacity building of state institutions and community members if necessary, to improve JETP governance.

### **ACHIEVING ACCOUNTABILITY AND JUSTICE**

- JETP governing bodies should adopt a formal framework for detecting, reporting and managing conflicts of interest throughout JETP planning and implementation, ensuring transparency and accountability across all decision-making processes.
- JETP country governments should ensure that permit-issuing, licensing and procurement standards are updated where necessary, to meet the values of the just energy transition.
- JETP governing bodies and project implementers should ensure comprehensive monitoring, reporting and public disclosure of information on JETP implementation at national and project levels – in particular, an assessment of the “justice” element.

# INTRODUCTION

The global climate crisis demands urgent action to transition away from fossil fuels. As extreme weather events and rising sea levels threaten communities worldwide, a shift to cleaner, renewable energy sources is critical.<sup>1</sup> The G20 has increasingly emphasised the urgent need to advance energy transitions through various pathways, to contribute to achieving sustainable development goals and global net-zero greenhouse gas (GHG) emissions by mid-century.<sup>2</sup> However, the energy transition is not just about technological changes, but also about transforming economies and societies around the world. For the energy transition to be socially just, it must ensure that no one is left behind in the process.

Just Energy Transition Partnerships (JETPs) are a new and evolving approach to climate finance. At their core, they are political agreements in which a group of predominantly Western donor countries and financial institutions work together to support selected coal-dependent emerging economies to move away from fossil fuels and towards cleaner energy, while addressing the negative social and economic impacts associated with the energy transition. To date, four JETP agreements have been signed with South Africa (2021), Indonesia (2022), Vietnam (2022) and Senegal (2023).

JETPs stand out from other climate finance initiatives for three key reasons. Firstly, they pursue an energy-oriented agenda, which is narrower than other climate funding mechanisms. JETPs aim to hasten the decommissioning of coal-fired power plants and to support the transition to renewable energy. This approach combines various funding modalities, including grants, concessional loans, market-rate loans and guarantees, some of which aim to de-risk and catalyse private investment in the development of renewable energy.

Secondly, taken together, JETPs represent one of the largest financial commitments to climate change to date. The initial financial package pledged for the first four countries totalled US\$46.5 billion. In comparison, the portfolio of the Green Climate Fund (GCF), the world's most prominent institution for climate financ-

ing, amounted to US\$13.5 billion in 2023, and combined with co-financing to total US\$51.8 billion.<sup>3</sup>

Finally, JETPs emphasise social justice as a fundamental component of the energy transition agenda. In the JETP agreements, donors and recipient country governments alike recognise the impact of the energy transition on livelihoods, workers and communities, and aim to address these challenges. The approach to achieving a “just transition” will differ from country to country, but the primary indicators of JETPs’ long-term success will be their socio-economic and justice outcomes.<sup>4</sup>

However, the significant funding allocated to JETPs could heighten the risk of malpractice in what is already a corruption-prone sector, as unscrupulous actors might seek to exploit these resources for private gain. This could create adverse dynamics of marginalisation within societies, as benefits are diverted to corrupt individuals, leaving disadvantaged groups to bear negative consequences, such as higher energy costs or exclusion from the benefits of new infrastructure.<sup>5</sup>

For JETPs to truly serve people and the planet, they must be protected from corruption and governed with integrity. Therefore, how the JETP processes are governed, whose interests are considered in decision making, and whether transparency and accountability are ensured will have a significant impact on their success.

Given that JETPs are the first agreements of their kind, evaluating their governance and integrity can help uncover areas in need of improvement. As existing JETPs move into the implementation phase and similar new agreements are forged, the lessons learned from initial JETP implementation can inform further partnerships and pave the way for more equitable and transparent climate finance on a global scale.





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## Methodology

This report focuses on the governance and corruption challenges in the just energy transition via JETPs, and how these challenges can undermine the partnerships' objectives. It examines the processes that have taken place since the first JETP was established, and makes recommendations on how these issues can be addressed through integrity measures.

The report analyses the challenges of achieving a just energy transition in three JETP countries: South Africa, Indonesia and Vietnam. Senegal, the fourth country that has signed a JETP partnership agreement, was not included in this analysis, as the JETP implementation process was not well advanced at the time this report was prepared.

The analysis draws on official, publicly available JETP documents and plans sourced from official government websites, academic and non-academic literature on JETPs published since 2021, after the first JETP was signed, and nine semi-structured interviews – three per country. These interviews were conducted between

April and July 2024 with key informants who have expertise in corruption, public accountability, climate governance and energy transition in the three countries. Interviewees included representatives of civil society organisations (CSOs), researchers and activists working in the selected JETP countries or actively following the energy transition process within JETPs. However, it should be noted that the analysis was limited by the fact that no public officials were available for interview during the research for this report.

This report identifies common challenges in realising a just energy transition through the JETPs, illustrated by examples from each individual country. This overarching approach was taken to enable the development of broad recommendations aimed at key stakeholders involved in current and potential JETPs – partner country governments, the governments of JETP countries, implementing agencies and private-sector actors – to improve transparency, accountability and integrity in the JETP implementation process.

# WHAT IS A JUST ENERGY TRANSITION?

The energy transition refers to a fundamental shift in the global energy system from fossil fuels such as coal, oil and gas to renewable energy sources, with the primary aim of reducing energy-related GHG emissions to address the impacts of human-induced climate change.<sup>6</sup> The transition seeks to increase renewable energy production, improve energy efficiency and electrify energy consumption, particularly in the transportation and building sectors, among other goals. This complex process requires three key interconnected elements: 1) the development of renewable energy infrastructure, including the deployment of solar panels and wind turbines, and expansion of electricity grids, 2) increased mining of critical minerals vital for producing low-carbon technologies, batteries and energy storage systems, and 3) the gradual phasing out of fossil fuels, which remains essential to reducing GHG emissions and achieving climate targets.

According to the International Renewable Energy Agency (IRENA), effective implementation of the energy transition at local, national and international levels can result in improved energy security, economic and social resilience, and human welfare globally.<sup>7</sup> However, it can also lead to job losses, higher energy costs and environmental degradation from increased mining. The distribution of benefits and burdens of the transition can greatly differ, and marginalised groups in society – such as women, youth, older workers, people with disabilities, migrant workers and Indigenous peoples – will have more difficulty accessing the opportunities created by the transition.

In this context, a just energy transition is an approach that involves reducing GHG emissions from energy production and consumption, in a manner that ensures the most impacted groups are not left behind.<sup>8</sup> Within the international climate policy arena, a just transition is seen as a framework for incorporating social justice into the policy, planning and investment processes that drive the energy transition.<sup>9</sup> However, there is currently no commonly agreed definition of what a just transition

means. Different groups may associate a just transition with different goals, and approaches vary depending on who the just transition prioritises, and how.<sup>10</sup>

At the international level, the Paris Agreement recognises the need for a just transition for the workforce and the creation of quality jobs, in line with nationally determined development priorities.<sup>11</sup> In this sense, the transition can focus narrowly on workers and communities whose livelihoods are tied to polluting industries, and strive to create decent work opportunities for them. However, just transition can also be seen as a pathway for broader social and economic change that involves everyone in society. This broader approach addresses the societal dimensions of the energy transition, such as the increased cost of living for low-income communities, and the negative impact on vulnerable groups, such as women, youth or elderly people.<sup>12</sup>

In October 2024, the G20 Sherpa Track Energy Transitions Working Group published voluntary principles for a just and inclusive energy transition to ensure energy security, affordability and accessibility, market stability and economic prosperity.<sup>13</sup> These principles emphasise the importance of social dialogue and meaningful stakeholder engagement, including the participation of affected communities, as well as social protection and inclusive policy planning to support just energy transition strategies.

The notion of a just transition can also vary greatly in its scope.<sup>14</sup> It can include reforms that address only the direct impact on workers, or it can embrace structural reforms that address the root causes of inequality in each society.<sup>15</sup> The most ambitious, however, is a transformation that requires an overhaul of the current economic, social and political systems that are responsible for the crises of sustainability and inequality.<sup>16</sup> Preferences for different approaches may stem from actors' political and ideological convictions, ranging from demands for green jobs to radical critiques of fossil fuel-dependent economic systems.<sup>17</sup>

A just transition can also be approached through the three principles of procedural, distributive and restorative justice, which can determine what type of justice issues are prioritised. Procedural justice places inclusion at the centre of a just transition process.<sup>18</sup> From this perspective, a just energy transition should focus on facilitating an inclusive decision-making and implementation process. This means ensuring continuous, rather than ad hoc, public participation, promoting the involvement of marginalised and vulnerable groups, and building trust between stakeholders.<sup>19</sup>

Distributive justice is concerned with the distribution of risks and opportunities in connection with the green energy transition.<sup>20</sup> For example, it addresses the negative impacts felt by coal workers and communities in coal-producing regions, such as the loss of income and livelihoods. At the same time, it aims to ensure that these groups have access to opportunities arising from renewable energy development. This requires the retraining and upskilling of workers affected by the energy transition, support for green businesses, training in green technology and innovation, social programmes that protect retirement security, and other possible measures.<sup>21</sup> According to the International Labour Organization (ILO), achieving distributive justice necessitates a country-specific mix of macroeconomic, industrial, sectoral and labour policy reforms.<sup>22</sup>

Restorative justice involves the socioeconomic empowerment of historically marginalised groups. It envisages the implementation of the energy transition in a way that prevents the repetition of colonial patterns, predatory land use practices or environmentally harmful behaviours.<sup>23</sup> For this reason, restorative justice goes beyond specific projects and short-term measures, and offers a vision for long-term change.

Climate finance plays a crucial role in ensuring a just transition. At the international level, climate finance for a just transition is inextricably linked to the principles of climate justice, as it sees rich countries as primarily responsible for mobilising the necessary funds (see Box 1). Providing the resources needed to support the transition to a low-carbon economy while overcoming social and economic inequalities in low-income communities can therefore be seen as essential for the realisation of national climate action plans and the success of the Paris Agreement.

## Box 1. Climate justice at the international level

Climate justice is a concept that captures the inherent injustice in the way the climate crisis is experienced. It is based on the recognition that while the world's richest countries bear responsibility for causing climate change and for most emissions in the past, the world's poorest communities are more likely to experience climate-related loss and damage.<sup>24</sup> At the international level, there are two key issues related to climate justice: firstly, whether countries are making their "fair share" of global efforts to reduce GHG emissions, and secondly, where the funds to support climate change mitigation and adaptation in lower-income countries come from.<sup>25</sup>

The question of what form climate finance should take is controversial, with differences between developing and developed countries.<sup>26</sup> The Paris Agreement emphasises that developed countries should continue to take the lead in mobilising climate finance from a variety of sources, instruments and channels.<sup>27</sup> Developing countries have argued that climate finance must be "new and additional", which is usually understood to mean that it should be provided in addition to other development aid. Developing countries have also stressed the need for grant-based financing, rather than the provision of further loans to countries already in debt. Some thinkers even argue that steps must be taken to ensure that the countries of the Global South benefit from a climate reparation programme through comprehensive debt restructuring and debt relief on the road to achieving climate justice.<sup>28</sup> Despite this, the Organisation for Economic Co-operation and Development (OECD) reports that loans continued to be the main instrument of public climate finance between 2013 and 2020. Only 26 per cent (US\$17.9 billion) of public climate finance was provided in the form of grants in 2020.<sup>29</sup> This topic therefore remains divisive in the global climate debate.

# How corruption can undermine a just transition

Corruption poses a critical threat to the integrity and success of any just energy transition initiatives. The transition confronts a triple threat of corruption risks: legacy issues from the energy sector, emerging challenges in the rapidly expanding renewable energy market, and governance concerns in the mining industry supplying critical minerals.

Historically, the energy sector has been highly vulnerable to corruption due to a number of interconnected factors.<sup>30</sup> Regulatory capture, often resulting from concentrated control of regulatory processes by a few key actors, has long plagued the energy sector, while the extensive coordination between public- and private-sector actors has created opportunities for corruption on both the supply and demand sides of energy production. In addition, the sector's reliance on public procurement systems has exposed it to practices such as bid rigging, price fixing, market sharing and the exchange of sensitive information. In the fossil fuel industry specifically, rent-seeking behaviour and fierce competition for state power have resulted in undue influence over climate policies and targets, artificially extending the life of fossil fuels and delaying the transition to cleaner energy.<sup>31</sup> These corrupt practices can have a significant impact on energy consumers and communities by raising prices, delaying and inflating infrastructure projects, exacerbating environmental and social consequences, and increasing energy poverty and vulnerability.<sup>32</sup>

However, evidence suggests that entrenched patterns of mismanagement and corruption are replicating themselves in renewable energy markets.<sup>33</sup> These risks arise from various business processes and functions, whether in tendering procedures, regulatory compliance, community involvement or project monitoring.<sup>34</sup> The novelty of the renewable energy sector exacerbates these risks, as regulations and policies may not yet be fully developed, making it susceptible to undue influence over bureaucratic processes.<sup>35</sup> In addition, the urgency of accelerating decarbonisation, combined with large sums of money being made available for renewable energy projects, may prompt authorities to rush through approval and licensing procedures, as

well as processes related to land acquisition, stakeholder consultation, and environmental and social impact assessments.<sup>36</sup>

In addition, the surge in demand for minerals needed for low-carbon technologies, such as cobalt, copper, lithium, nickel and rare earths, introduces new governance and corruption risks to the just energy transition.<sup>37</sup> Transparency International's Accountable Mining Programme highlights several concerns in this context.<sup>38</sup> One significant risk is the increase in mining project licences being issued in jurisdictions characterised by weak governance and high levels of corruption. There is also often pressure to fast-track projects and strategic initiatives in the sector, which can result in the neglect of essential due diligence processes, particularly those related to environmental and social impact assessments. In addition, as state involvement in the extraction value chain increases, the risks of conflicts of interest and regulatory capture become more pronounced. Mining investments in environmentally, socially or politically sensitive areas can exacerbate existing tensions and marginalisation, and lead to instability in communities that are already facing challenges.

For example, large-scale renewable energy projects, such as wind, solar and hydropower development or the extraction of critical minerals, require access to large areas of land. This can create a high risk of corruption in land acquisition.<sup>39</sup> Such corruption can manifest through bribes during the land administration process, extortion for land titles, denial of land rights, exclusion of communities from land deals between private investors and local authorities, and eviction of people from their land without adequate compensation or participation in decision-making processes.<sup>40</sup> These problems can be particularly acute when energy companies operate in remote regions or marginalised communities. In such environments, there is a higher risk that consultations and agreements will be manipulated or that benefit programmes will be captured by local power brokers.<sup>41</sup>



A lack of transparency and accountability in the energy transition process can lead to the abuse of power and impunity among decision makers. This not only hinders the achievement of climate goals, but also disproportionately harms already marginalised communities. To be fully just, the transition must provide all societal groups with access to the opportunities arising from the shift to a net-zero future; ensure broad representa-

tion and inclusion in decision making, and empower historically marginalised communities. However, corruption in its various forms allows a select few to pursue their private interests at the public's expense, driven by personal and special relationships between powerful groups and individuals, resulting in an unfair distribution of public resources.<sup>42</sup>



photo: Amril Nuryan, shutterstock

# PROGRESS AND VULNERABILITIES IN JETP IMPLEMENTATION

To date, four JETP political agreements have been concluded, with South Africa (2021), Indonesia (2022), Vietnam (2022) and Senegal (2023) (see Box 2). In South Africa, President Cyril Ramaphosa set up the Presidential Climate Finance Task Team (PCFTT) as a national focal point after the conclusion of the JETP negotiations, to engage with the partner governments forming the International Partners Group (IPG) and assess their financial proposals. Subsequently, the South African JETP Secretariat was formed to offer technical expertise and coordination, facilitating the development of the just energy transition investment plan under the guidance of both the PCFTT and the IPG.

South Africa's Just Energy Transition Investment Plan (JET IP) sets out a vision for the energy transition pathway, identifies financing needs and requirements, makes recommendations for policy reforms, prioritises projects, and defines other implementation modalities. The investment plan is a "living document", regularly evaluated and updated to take account of the latest market developments and political priorities. It therefore provides an opportunity for frequent consultation and continuous oversight, and allows policies to be adapted to better meet the needs of all stakeholders, especially those most affected by the impacts of the energy transition.

South Africa's approach seems to have set a precedent, as Indonesia's and Vietnam's JETP agreements clearly outlined the need to establish JETP Secretariats and develop investment plans that identify the financial resources required to implement the just energy transition effectively in each country. South Africa, Indonesia and Vietnam have already published their just energy transition investment plans (see Table 1), while Senegal's is currently under development.

Given the unique socio-economic contexts, domestic energy markets and political landscapes of each JETP

country, it is essential that these partnerships are structured differently. All JETPs share the overarching goal of assisting the selected developing countries' transition away from coal, while mitigating negative impacts and creating opportunities for affected population groups. However, the specific details – such as governance structures, project implementation and justice-related initiatives – will vary. This tailored approach should enable more effective implementation and ensure that each country's unique needs and goals are better addressed and aligned with the energy transition.

Currently, JETP governance processes in each country are still evolving, and beyond the initial planning phase, there has been limited progress in their implementation, in terms of policy reforms, fund mobilisation or project execution. As governance processes become more defined, ongoing evaluation and adaptation will be vital to safeguard transparency, foster accountability and ensure the integrity of JETP implementation at every stage.

As outlined in the methodology, the following section builds on the thorough analysis of JETP-related policy documents, strategies, academic studies and key informant interviews. The six subsections explore key barriers to a transparent, accountable and just energy transition identified through this research. While some of these challenges have already materialised, others may arise due to integrity gaps or underlying conditions. Although not novel, these challenges have profound implications for JETPs' success and a just energy transition. They not only threaten the achievement of climate goals and the reduction of GHG emissions, but also risk exacerbating human rights violations, and worsening conditions for already marginalised groups. Addressing these risks is essential to enable JETPs to fulfil their intended purpose of securing a transition to clean energy and ensuring that it is just.



## Box 2.

### JETPs to date

The first JETP was established between the government of **South Africa** and the governments of France, Germany, the UK, the United States and the European Union (EU), which formed the International Partners Group (IPG). At the UN Climate Change Conference of the Parties in Glasgow (COP26) in 2021, the IPG pledged to mobilise an initial amount of US\$8.5 billion over the following 3-5 years. This funding, through various financial instruments, aims to support South Africa in achieving the ambitious emissions reduction targets outlined in its updated Nationally Determined Contribution (NDC), which describes how the country intends to contribute to achieving the goals of the Paris Agreement. The partnership aims to accelerate decarbonisation of the country's electricity system, enable policy reforms in the electricity sector, develop local value chains to benefit from new areas of economic development. It also seeks to create opportunities for technological innovation and private investment, alongside supporting South Africa's efforts to protect vulnerable workers and communities. The country has since received additional pledges from Denmark, the Netherlands, Spain and the World Bank, pushing the JETP funding to US\$11.9 billion.<sup>43</sup>



the IPG leaders, which envisaged the mobilisation of public and private funding, initially amounting to US\$20 billion. It is intended that the private finance will be mobilised from financial institutions that are members of the Glasgow Financial Alliance for Net Zero (GFANZ). The agreement is intended to support Indonesia in decarbonising the electricity sector and accelerating the use of renewable energies, including measures to increase energy efficiency and develop value chains in industries critical to the energy transition.

One month later, in December 2022, the JETP with **Vietnam** was launched, with the IPG committing to mobilise an initial amount of at least US\$15.5 billion, which includes financing through GFANZ. This funding aims to focus on renewable energy and the just energy transition, including measures to improve energy efficiency and strengthen the electricity grid, which will contribute to the achievement of the targets stated in the National Strategy on Climate Change to 2050 and the country's NDC.



Most recently, in 2023, the IPG announced the JETP with **Senegal** and an initial commitment to mobilise €2.5 billion (approximately US\$2.7 billion). The funding is intended to support Senegal in developing a comprehensive, climate-resilient strategy for the energy sector, in line with the country's goal of improving access to electricity; job creation and energy affordability. It also aims to strengthen the development of renewable energy and shift the country's electricity generation from highly polluting fuels to clean energy, to reduce emissions from the sector.



Since then, other coal-dependent emerging economies also have negotiated JETP agreements with different combinations of the G7 countries (see Table 1). In November 2022, during the G20 Summit in Bali, the JETP was launched between **Indonesia** and



TABLE 1: JETPS AS OF JUNE 2024

JETP COUNTRY	IPG MEMBERS	DATE SIGNED	AMOUNT PLEDGED	INVESTMENT PLAN LAUNCHED
South Africa	UK, United States, France, Germany, EU	2 November 2021, COP26 in Glasgow	US\$8.5 billion between 2023 and 2027	South Africa's Just Energy Transition Investment Plan (JET IP) for the Initial Period 2023-2027
Indonesia	United States, Japan, Canada, Denmark, EU, France, Germany, Italy, Norway, UK	15 November 2022, G20 Summit in Bali	US\$20 billion (US\$10 billion will be mobilised by the IPG members and at least US\$10 billion in private finance through GFANZ)	The Comprehensive Investment and Policy Plan (CIPP)
Vietnam	EU, UK, United States, Japan, Germany, France, Italy, Canada, Denmark, Norway	14 December 2022, COP27 in Sharm El-Sheikh	US\$15.5 billion (US\$7.75 billion of public sector finance and at least US\$7.75 billion in private finance through GFANZ)	Resource Mobilisation Plan Implementing the Political Declaration on Establishing the Just Energy Transition Partnership (JETP)
Senegal	France, Germany, UK, Canada, EU	22 June 2023, Summit for a New Global Financing Pact in Paris	€2.5 billion (approximately US\$2.7 billion)	Plan still in preparation

## Pre-existing governance issues in the energy sector make JETPs vulnerable to corruption

The just energy transition under the JETPs is expected to be significantly shaped by pre-existing governance challenges in the energy sector in all JETP countries, with corruption posing a major obstacle. According to Transparency International's annual *Corruption Perceptions Index (CPI)*, since the first JETP agreement was signed with South Africa in 2021, all three countries – South Africa, Indonesia and Vietnam – have scored at or below the global average, showing little to no progress in improving their ranking (see Table 2).

JETP financing will primarily focus on the capital-intensive energy sector, specifically targeting three areas: 1) phasing out existing coal-fired power plants, 2) supporting the development of renewable energy production, and 3) financing projects and programmes for a just transition. As a result, both established and new stakeholders in the energy sector will be involved in the JETP process. In the three countries studied, energy

markets have struggled with a lack of transparency, poor governance, inadequate regulatory frameworks and entrenched interests, all of which have previously delayed energy transition reforms.<sup>44</sup> These factors imply that JETPs may face challenges related to existing corrupt practices, as well as the likelihood that new funding streams will increase the risk of further corruption.

In **South Africa**, for example, the state-owned enterprise Eskom, which provides approximately 90 per cent of the country's electricity, grapples with an ageing asset-base of coal-fired power plants that are constantly failing due to a lack of maintenance, years of underinvestment, sabotage and corruption.<sup>45</sup> According to allegations made in 2023 by former Eskom CEO Andre De Ruyter, approximately a billion rand (more than US\$56 million) are stolen from the entity each month, including via corruption and infrastructure theft at power stations.<sup>46</sup> The utility company has struggled to provide

enough power to citizens for more than a decade, with most households experiencing power cuts for more than 10 hours per day in 2023.<sup>47</sup> Systemic corruption has placed a burden on both the energy grid and the country's economy, which makes energy transition both urgently needed and a particular challenge.

In **Indonesia**, numerous high-profile corruption cases involving former energy sector officials highlight the persistent issues of rent capture and distribution. In 2016, Jero Wacik, Minister of Energy and Mineral Resources from 2011 to 2014 was sentenced to four years in prison for his role in two embezzlement cases.<sup>48</sup> More recently, in 2019, Eni Saragih, a politician from Indonesia's second-largest party, received a six-year sentence for accepting bribes in a corruption case related to a multi-million dollar project for a coal-fired power plant in the province of Riau.<sup>49</sup>

In **Vietnam**, the heavily regulated and corruption-prone energy sector is known for its opaque decision making, frustrating investors and manufacturers, and making it one of the government's more significant economic vulnerabilities.<sup>50</sup> According to a media report on the country's anti-corruption campaign, more than 80 per cent of those disciplined by the Central Inspection Commission in January 2024, including individuals and party committees, were from state-owned companies or ministries operating in the energy sector.<sup>51</sup> The renewable energy sector is also embroiled in the crackdown, with 32 wind and solar projects under investigation for abuse of power in 2024.<sup>52</sup>

However, when the JETP governance plans were developed, national anti-corruption agencies, anti-corruption CSOs and experts were not involved in the planning from the outset, and corruption risks and mitigation strategies were not fully assessed in the process. The **South African** JET IP and the **Indonesian** Comprehensive Investment and Policy Plan (CIPP) contain a general risk register in which various risks are identified and mitigation measures proposed. In both cases, the risk

of corruption is generally categorised as "high", but no detailed assessment of corruption risks in the energy or renewable sectors appears to have been carried out. The documents propose regular monitoring and oversight to prevent the misuse of funds, but more stringent measures will be required to achieve this. In the **Vietnamese** Resource Mobilisation Plan (RMP), anti-corruption is mentioned only briefly as one of the general assessment criteria for ensuring a "just transition" in energy project development and monitoring, but no thorough risk assessment is included.

Unless corruption risks are identified and addressed early, the integrity and effectiveness of the process could be undermined, leading to potential setbacks in achieving the intended outcomes of a just energy transition.

#### RECOMMENDATIONS:

- JETP governing bodies should ensure early and comprehensive assessment of corruption risks by involving national anti-corruption and oversight bodies, CSOs and experts.
- JETP governing bodies should adopt and implement best practice anti-corruption policies and procedures, introducing institutional accountability measures, to address systemic gaps that allow corruption to infiltrate the energy sector.
- JETP donors should ensure that JETP countries undertake a mandatory comprehensive corruption risk assessment and introduce appropriate and proportionate anti-corruption processes and accountability measures in response to identified risks.
- JETP governing bodies should publicise details of investigative procedures and sanctions in cases of corruption, and ensure that companies involved in corruption are prevented from bidding on JETP-related contracts.

TABLE 2: TRANSPARENCY INTERNATIONAL'S CORRUPTION PERCEPTIONS INDEX RANKINGS FOR THE JETP COUNTRIES 2021-2023 (0 DENOTES VERY CORRUPT, AND 100 VERY CLEAN)

JETP COUNTRY	2021	2022	2023
South Africa	44/100	43/100	41/100
Indonesia	38/100	34/100	34/100
Vietnam	39/100	42/100	41/100

## Insufficient access to information in the establishment of JETPs diminishes integrity and erodes trust

Timely access to meaningful information in the initial stages of any energy transition process is essential to foster participatory decision making. It also enables those affected to seek redress if integrity and human rights are not respected. However, none of the JETPs so far were formed through a transparent process. Initial negotiations often took place at the highest political levels, involving government officials and IPG leaders, with limited opportunities for local civil society input or early involvement of affected communities.

In **South Africa**, civil society actors and labour unions have been actively advocating for a just transition and have led the national debate on this issue for many years. In 2021, the Presidential Climate Commission (PCC) began developing the Just Transition Framework, a planning tool to achieve a just transition in South Africa. Throughout the year, the PCC initiated studies, formal stakeholder hearings, high-level meetings, workshops and conferences, which led to the development of the final framework, officially adopted in August 2022.<sup>53</sup>

Despite this, initial high-level discussions within South Africa regarding the JETP agreement primarily involved state institutions, several prominent business think tanks and Eskom.<sup>54</sup> Later, the South African Presidency and Eskom engaged with donors to further these

talks.<sup>55</sup> The energy transition was seen by President Ramaphosa and his cabinet as a dual opportunity, both to address internal power-sector challenges and to meet climate mitigation targets. Yet the majority of these deliberations surrounding the JETP remained confidential, limiting public input during its conceptual development and restricting meaningful civil society oversight.<sup>56</sup> This has led to concerns and scepticism among trade unions and workers about the agreement, and undermined confidence in subsequent stakeholder consultations.<sup>57</sup>

In **Indonesia**, although public hearings and consultations are part of the political decision-making process, civil society often encounters a power imbalance, especially with established stakeholders in the energy sector, such as government and fossil fuel industry representatives.<sup>58</sup> Prior to the G20 summit in Bali, expectations were high for discussions on the energy transition agreement between the Indonesian government and Western state leaders. However, details were withheld by the Indonesian government, reportedly at the request of the IPG, leaving CSOs speculating about the nature of the IPG commitment and the funding modalities of the new agreement.<sup>59</sup>

In parallel, the #BersihkanIndonesia coalition, a group of CSOs that includes Transparency International

Indonesia, held debates on the just energy transition in the country. The coalition campaigns on issues such as coal phase-out, responsible mining, Indigenous peoples' rights and anti-corruption. In this context, civil society actors discussed the critical aspects of the then upcoming JETP agreement, such as governance structure, values, principles and the definition of a just energy transition. The document, which #BersihkanIndonesia distributed after the debate, highlights that the participating CSOs consider the values and principles of justice, sovereignty, transparency, accountability, integrity and anti-corruption, alongside other climate-related and cultural principles, as cornerstones for a just and sustainable energy transition in Indonesia. However, there was no opportunity for an official dialogue with the state authorities during the JETP negotiations. These groups were only able to voice their stance and demands after the JETP agreement had been finalised and official stakeholder consultations were scheduled to discuss the investment plan. This raised doubts about the partnership's capacity to deliver a just transition and fuelled scepticism among stakeholders.

In **Vietnam**, the scope for civil society to engage in policy debates has diminished over the past decade.<sup>60</sup> There was a period of relative openness from 2010 to around 2020, when semi-independent non-governmental organisations (NGOs) and energy experts collaborated with state institutions to promote a sustainable energy transition, supported by international donors.<sup>61</sup> However, since 2020, groups operating outside state structures have encountered formidable barriers to participating in the energy transition process. In 2020, for example, the Vietnamese government rejected the request of Towards Transparency, the former national contact of Transparency International in Vietnam, to collaborate in promoting integrity in the area of climate change. Since 2021, five environmental, land rights and civil rights activists, along with a prominent energy expert, have been arrested on alleged tax offences and appropriation of documents.<sup>62</sup> In this climate of repression, the JETP agreement was negotiated behind closed doors, excluding meaningful civil society participation. These developments caused concern among international observers interviewed for this report, who saw the JETP process as instrumentalised by the government to pursue its energy security goals and undermine the justice and integrity aspects.

Although circumstances in the three countries differ, they all faced the common issue of many stakeholders lacking timely and relevant information about JETPs, leading to widespread scepticism about the agreements. Insufficient access to information might

jeopardise a just energy transition by weakening stakeholder trust. Although each JETP will differ, strong buy-in from diverse stakeholders at the national level is essential for the successful implementation of these partnerships. A lack of transparency can also constrain the ability of different actors to detect corruption risks.

#### RECOMMENDATIONS:

- JETP governing bodies must facilitate early, meaningful and inclusive multi-stakeholder engagement on the just transition, in particular involving civil society groups and communities from the regions most affected by coal phase-out, to reflect the different needs, expectations and interests associated with the process, secure public support, and build equity and trust.
- JETP country governments should introduce policies and regulations to provide access to useful and timely information on decision making, including via transparent communication and engagement during negotiations for the JETP agreement.
- JETP donors should ensure that all key decision-making processes, documents and communications during JETP negotiations are made transparent, and are easily available and accessible to stakeholders in a timely manner.



photo: Armand Burger, iStock





# Limited stakeholder inclusion in the development of JETP investment plans compromises public accountability

Following the signing of a JETP agreement, the development of investment plans for just energy transitions offers a key opportunity for JETP governing bodies to engage the broader stakeholder community in decision making. This is therefore also a stage at which to set standards and precedence for accountability and citizen oversight of JETP implementation. As previously noted, the achievement of a just transition can mean different things to different groups. Continuous dialogue is therefore crucial to ensure diverse perspectives are considered and integrated into policy planning from the beginning.

All JETP implementation plans acknowledge that multi-stakeholder dialogue is essential for achieving a just energy transition. Formally, each JETP investment plan undergoes a consultation process with stakeholders. However, ensuring meaningful stakeholder participation has been a common challenge in all JETP countries. In some cases, participation processes have been criticised as tokenistic, offering limited opportunities for inclusive or meaningful input from CSOs and especially from affected communities.

In **South Africa**, the government held several rounds of consultation with various stakeholders, but was criticised for failing to engage civil society actors and affected communities in a meaningful way. For example, according to the 2024 opinion survey conducted by the South African Seriti Institute with the support of the United Nations Development Programme (UNDP), the just energy transition initiatives are still relatively unknown among community members in the regions of Mpumalanga, Limpopo and KwaZulu-Natal, which are heavily dependent on coal mining.<sup>63</sup> Only 4 per cent of survey respondents reported hearing anything about the just energy transition from councillors or other government officials, indicating a lack of direct communication from local government representatives.<sup>64</sup>

In **Indonesia**, the JETP Secretariat has organised consultation workshops during the development of the investment plan with key stakeholders, including civil society and trade unions. The Secretariat has ensured

transparency by publishing all meeting reports and minutes online, along with the comments received on the draft CIPP.<sup>65</sup> Online channels for public feedback remain open, and it claims that efforts are made to address comments regularly. However, interviewees emphasised that communication with the Secretariat has been limited since the consultations ended, and described a lack of clarity over which particular comments decision makers take into account and the reasons for such decisions. This issue is compounded by the limited decision-making authority of the Indonesian JETP Secretariat, whose role is to coordinate stakeholder meetings and primarily provide information to stakeholders, while important decisions are made at the highest political level between the Indonesian government and the IPG. It therefore remains a challenge to foster meaningful public accountability to ensure that the concerns of those affected are taken into account.

In **Vietnam**, development of the RMP for implementing the JETP has faced criticism for its lack of transparency and inclusion. Few groups appear to have been consulted,<sup>66</sup> and hearings were described by some interviewees as a mere “checkbox exercise,” especially given the arrest of prominent activists and experts. Consultations were only opened in August 2023, during the later phase of development, with the 200-page document distributed to stakeholders only the day before the hearing, according to one interviewee. The second round of consultations took place in October and the final version of the document was presented at COP28 in December, meaning there were virtually no opportunities for affected communities or organisations fighting for their rights to voice their concerns or monitor the decision-making process.

The question of what role donors should play in encouraging procedural justice and accountability during the JETP implementation process remains critical. For instance, the political declaration establishing the JETP with **Vietnam** notes the necessity of regular consultations with stakeholders, including the media and NGOs, to ensure broad social consensus and a just transition. Yet, despite condemnation by the UN, IPG

member states and activist groups of the environmentalists' arrests,<sup>67</sup> these incidents appear to have had minimal impact on JETP development. On the contrary, the RMP garnered high praise from IPG leaders.<sup>68</sup> Academic and activist groups have criticised the IPG for its vague language and lack of action regarding the human rights violations.<sup>69</sup>

It should be noted that the international donor community in **Vietnam** has attempted to facilitate broader public participation. For example, the UNDP hosted a workshop aimed at promoting international cooperation and experience sharing in the just energy transition process before the official consultation workshop.<sup>70</sup> However, the effectiveness of donor-driven roundtables to facilitate stakeholder oversight is limited. In Vietnam, donors must gain advanced government approval for their list of invited participants, restricting the extent to which these workshops can criticise government policies or ensure diverse representation.<sup>71</sup>

Despite formal stakeholder consultations in all JETP countries, these processes have often been criticised for lacking meaningful inclusion, particularly of civil society and affected communities. The limited role of non-governmental stakeholders in the development of just transition plans risks undermining public accountability, making it difficult for communities to oversee and influence JETP implementation effectively.

Early engagement of stakeholders – particularly those in communities most directly impacted by the energy transition – is essential, not only for integrating principles of procedural justice into planning and executing the energy transition, but also for building stakeholder trust. By facilitating active listening and responses to stakeholders' concerns, such engagement is a key step in securing support for the energy transition and ensuring it is just. Fostering multi-stakeholder partnerships can also enhance integrity and help prevent and combat corruption in the energy transition from the outset.<sup>72</sup>

## RECOMMENDATIONS:

- JETP governing bodies should ensure continuous consultation with diverse stakeholder groups, giving special priority to the inclusion of women and Indigenous peoples, to enhance public accountability in the development of JETP plans. Stakeholders should have timely access to relevant documents and decisions, allowing them to provide informed feedback.
- JETP governing bodies should maintain open and transparent communication, clearly explaining which stakeholder feedback has been taken into consideration and providing justification for decisions. This will help foster trust and accountability throughout the process.
- JETP donors should enshrine robust standards related to integrity and civil society engagement in the agreements and investment plans. As early as possible in the process, they should invest in institutional capacity development on governance-related issues for key national bodies.

# Insufficient transparency in JETP financing impairs public scrutiny

The JETPs represent a significant milestone in international climate cooperation, due to the scale of their financial commitments, which in total surpass many other multilateral climate finance initiatives.<sup>73</sup> However, the lack of transparency of JETP funding modalities and conditions hinders public oversight, impairing the ability of citizens, CSOs, and national and global activist groups to monitor whether funds are used to promote a just transition, rather than serving the interests of a select few. A lack of transparency can also constrain different actors' ability to pool resources and skills to solve problems that might arise during the transition.

Local stakeholders interviewed in each country voiced concerns about the high levels of confidentiality surrounding the details of JETP financial deals, even after the IPG commitments were announced. As just transition investment plans were developed, it became evident that only a tiny part of the financial package would be provided as grants and technical assistance (see Table 3). The majority of the financing would consist of concessional and commercial loans, which pose the risk of further indebtedness for the JETP countries. When this information became publicly available, significant concerns were raised about the lack of transparency over conditionality and overall debt sustainability.

In **South Africa**, for example, the fact that loan agreements are often concluded without transparent processes or adequate public consultation<sup>74</sup> is fuelling limited public trust in the JETP partnership and broader energy transition efforts. Local experts interviewed for this report have raised concerns that the conditions tied to loans under the JETP have not been clearly communicated to the public, leaving citizens unaware of their full implications.

For example, the political declaration establishing South Africa's JETP hints at policy reforms that many trade unions see as a push towards privatisation. From the perspective of workers in the coal sector, this means a deterioration in working conditions and less bargaining power.<sup>75</sup> South Africa's colonial history amplifies concerns that privatising the energy sector could expose

markets to foreign companies, potentially leading to renewed economic exploitation.<sup>76</sup> There is also concern that growing indebtedness will lead to austerity measures or other financial tightening, burdening the population and increasing inequalities.<sup>77</sup> These concerns are heightened by the scarcity of information available to the public for monitoring transition-related financing in South Africa.<sup>78</sup> Inadequate monitoring can lead to misappropriation of funds, as interviews with several experts emphasised.

In addition, the allocation of JETP grants, which account for only about 4 per cent of total JETP funding in **South Africa**, about 2 per cent in **Vietnam** and about 1.4 per cent in **Indonesia**, raises significant concerns about their transparency and effectiveness. It remains unclear whether these grants represent "new and additional" climate finance or are simply a rebranding of pre-existing funds, which is a general problem within climate finance (see Box 1).<sup>79</sup> As the grants are distributed by traditional donor organisations, there are also doubts about how much of the allocated funding will benefit national or local actors once administrative costs are deducted by the donors.<sup>80</sup> According to a journalistic analysis published in the Daily Maverick, for example, only 24 per cent of the grants designated as JETP-related go to **South African** implementing organisations, while the rest flows directly back to the donors' own development agencies, development banks and institutions.<sup>81</sup>

Critically, the high share of loans compared to grants also raises questions about the climate justice of this international finance initiative (see Box 1) – a factor which affects the commitment and ambition of recipient countries.

Implementation of the JETP in **Indonesia**, for example, has stalled since the release of the CIPP. Due to the unattractive financial package, the Indonesian government is hesitating to fully commit to a coal phase-out until the IPG clarifies funding modalities and promises, according to a national interviewee. The **Vietnamese** RMP is already less ambitious than originally envisaged, and there is no timetable for the early decommission-

ing of coal-fired power plants. Instead, the government is endeavouring to operate the plants flexibly, sending mixed signals to the Vietnamese energy sector.<sup>82</sup>

There also appear to be delays on the donor side in the disbursement of promised funds. By 2023, two years after the signing of the JETP political agreement, **South Africa** had only received €600 million (around US\$670 million) from France and Germany in the form of concessional loans,<sup>83</sup> which limits the government's ability to launch planned projects and programmes on time. The donors, in turn, justify the delay in disbursing funds by citing the need for a robust investment pipeline and the challenges posed by significant regulatory, legal and organisational reforms.<sup>84</sup>

These delays are concerning, as there are already discrepancies between the funds needed for a just energy transition in each country and the amounts pledged under JETP agreements (see Table 2). For example, **South Africa's** JETP estimates that US\$98 billion in climate finance will be needed over the next five years to catalyse a sustainable, equitable energy transition. This leaves a staggering gap of around US\$89.5 billion that the country will need to cover from other sources.

The initial IPG commitment is intended as a “catalyst investment” for the first 3-5 years, to attract or mobilise the necessary remaining funds.<sup>85</sup> However, resource scarcity could lead to competition and foster corruption. A Transparency International study on public service provision across Africa found that corrupt practices often stem from perceived low remuneration among officials, which exacerbates inequalities, particularly for women, girls and marginalised communities.<sup>86</sup> Inadequate funding therefore creates a risk that the “just” aspect of the transition will be side-lined during this crucial initial phase.

These debates point to fundamental problems in global climate finance, highlighting the discrepancy between the expectations, needs and interests of donor and recipient countries. However, it is crucial to clearly identify and openly discuss these discrepancies, to facilitate informed negotiations and accountability in international climate cooperation. To this end, it is critical that the public has timely access to information about debt-related details, rules, plans, processes and actions, so that citizens can hold officials accountable for decisions taken in the public interest.<sup>87</sup> Donors are also responsible for ensuring transparency in lending processes, so that both borrowers and lenders can be held accountable for their financial decisions.

## RECOMMENDATIONS:

- JETP donors should take a leading role in ensuring timely disclosure of information about the support provided under JETPs, including the nature of the support and any conditions attached. They should ensure full transparency regarding the allocation and use of JETP grants, clearly distinguishing between “new and additional” climate finance and pre-existing funds.
- JETP donors and JETP country governments should establish clear provisions for transparency and accountability regarding JETP-related debt, with specific monitoring and audit measures to ensure responsible management.
- JETP governing bodies should guarantee access to all JETP-related information on fund allocations, tendering decisions and related contracts.
- All financial partners and project implementers should proactively disclose to the public details of JETP-related funds and their use, to enhance accountability and trust.

TABLE 3: TOTAL AMOUNT NEEDED FOR A JUST ENERGY TRANSITION, ACCORDING TO JETP INVESTMENT PLANS

JETP COUNTRY	ESTIMATED REQUIRED FUNDS FOR JUST ENERGY TRANSITION	INITIAL AMOUNT PLEDGED BY IPG	PERCENTAGE OF IPG FINANCING COMPOSED OF GRANTS
South Africa	US\$98 billion for 2023-2027, to catalyse a sustained, just energy transition	US\$8.5 billion between 2023 and 2027	Around 4%
Indonesia	US\$96 billion for implementation of the JETP pathway by 2030 and US\$580 billion by 2050	US\$20 billion (US\$10 billion will be mobilised by the IPG members and at least US\$10 billion in private finance through GFANZ)	Around 1.4%
Vietnam	US\$134.7 billion until 2030, and another US\$364 billion to US\$511 billion for 2031 to 2050	US\$15.5 billion (US\$7.75 billion of public sector finance and at least US\$7.75 billion in private finance through GFANZ)	Around 2%



# Underdeveloped governance frameworks risk compromising JETP integrity

JETPs stand out due to their programmatic financing approach, extending beyond specific projects to support decarbonisation, renewable energy deployment and energy efficiency, while promoting a just energy transition through technical support programmes.<sup>88</sup> This broad approach offers an opportunity for sector-wide changes and reforms. However, its success depends on strong oversight, effective coordination and careful management of pooled resources, to avoid misuse of funds.

At present, the only concrete details available regarding JETP governance structures are those outlined within investment plans. These details vary from country to country, but share overarching structures:

- **Direction and oversight:** Governmental mechanisms such as South Africa's PCFTT, Indonesia's National Energy Transition Task Force and Vietnam's COP26 Steering Committee will act as key decision makers on issues such as JETP commitments, investments, financing and policy choices. The IPG, the sole external oversight actor, will primarily coordinate financial options and receive implementation reports from partner governments.
- **Coordination:** The JETP Secretariats in each country will serve as the primary coordination bodies between policy and implementation levels. They will also liaise with external stakeholders, such as the IPG and GFANZ.
- **Implementation:** Various working groups and stakeholders, including project developers, financiers, state-owned enterprises and private companies, will be involved in the JETP implementation process.

The investment plans also consider the establishment of monitoring and evaluation systems. For instance, **South Africa's** JET IP introduces the idea of a monitoring, evaluation and learning framework to ensure "procedural justice" in the just energy transition. **Indonesia's** CIPP discusses plans on establishing a

framework for monitoring and evaluating aspects of the JETP, such as technical, political, financial and transition components. **Vietnam's** RMP envisages annual monitoring and evaluation of resource mobilisation and programme implementation, along with biennial reviews of technical aspects such as GHG emissions targets. The JETP political agreements with Indonesia and Vietnam stipulate that a biannual review process must be developed to assess compliance with JETP high-level targets.

While such plans suggest an intention to oversee the transition process, the effectiveness of these governance structures remains untested, and they are still in development. For governance to be efficient, these frameworks must be well-developed early in the process. Delays or underdeveloped aspects can lead to confusion and gaps in oversight. Assessing resource and capacity needs is also critical to ensure that adequate resources are allocated for coordination and oversight, as both are vital to the success of the transition.

Current frameworks involve numerous stakeholders, which adds complexity. This, in turn, risks creating coordination challenges and communication gaps, potentially undermining implementation of the energy transition. Without clear, well-structured governance mechanisms, the multi-stakeholder nature of JETPs could result in fragmented decision making, which would slow down progress.

Stakeholders interviewed from all three JETP countries highlighted the lack of clarity regarding decision-making processes for non-governmental actors. Clarity is also needed over reporting obligations, including which aspects will be monitored, and how justness and integrity in JETP implementation will be ensured.

In **South Africa**, for instance, transparency at the policy level and public access to information on JETP activities, funding and decisions remain limited, raising concerns about accountability.<sup>89</sup> While the South African PCC



serves as a valuable platform for coordinating the energy transition at the national level, it lacks a robust institutional oversight mechanism, such as parliamentary scrutiny, to ensure greater accountability and transparency. Meanwhile, the **Vietnamese** RMP lacks provisions for monitoring the social aspects of the JETP, raising concerns about how the just transition will be monitored.

It must be clarified whether and how monitoring and evaluation reports will be made publicly available to enable effective oversight by non-state actors. The roles of CSOs and trade unions in monitoring project implementation and ensuring a just transition have been acknowledged in the **Indonesian** and **South African** plans, but how these roles will be guaranteed requires further detail. Currently, only the Indonesian CIPP mentions a plan to establish grievance mechanisms for communities. None of the investment plans mentions the need for whistleblower protection. As the oversight frameworks develop, these gaps must be addressed, and measures for transparency, accountability and integrity clarified, to ensure a just energy transition under the JETPs.

## RECOMMENDATIONS:

- JETP governing bodies should establish clear, robust and inclusive governance structures, in which responsibilities and processes for decision making, oversight and coordination are transparent to all stakeholders.
- JETP governing bodies and project implementers should establish grievance mechanisms and policies and procedures that ensure the protection of environmental defenders and whistleblowers, to uphold integrity in JETP operations, at both national and project levels.
- JETP governing bodies and donors should encourage learning on governance issues through peer-to-peer exchange and experience sharing at global forums such as the G20, and in bilateral cooperation between current and potential JETP countries.
- JETP governing bodies should ensure that enough resources are allocated for coordination and oversight of all JETP activities, and for capacity building of state institutions and community members if necessary, to improve JETP governance.



photo: Lucian Coman, shutterstock

## Undue influence of commercial interests in JETPs risks undermining equity and social justice

A defining feature that sets JETPs apart from other climate initiatives is their explicit commitment to a “just” transition. However, despite the JETP declarations and investment plans underscoring the importance of equity and justice, there are significant concerns among stakeholders about the lack of institutional focus on these critical issues, and the ambiguity surrounding the objectives for achieving broader social and economic change.

The current JETP funding packages have been criticised for their commercial approach, suggesting that IPG countries, JETP country governments and investors are prioritising the marketability of energy transition.<sup>90</sup> Given that affected communities in all three countries had limited access to JETP negotiation spaces and infor-

mation, there is a high risk that political deals reflect approaches to an energy transition that primarily benefit financiers rather than those most impacted.

In **South Africa**, trade unions have expressed concerns that important information about the JETP and the JET IP and its design was withheld from them during the consultation meeting.<sup>91</sup> The negative impacts of the transition on workers and communities was reportedly not openly discussed,<sup>92</sup> limiting their ability to advocate for the inclusion of these vulnerable groups’ interests. In **Indonesia**, there is a high risk of corruption and conflicts of interest within the energy sector, especially with the presence of politically exposed persons and weak regulation.<sup>93</sup> This can create an environment

where business interests exert undue influence on the just transition and using JETPs as a framework to pursue narrow economic interests, rather than benefiting society as a whole. The **Vietnamese** RMP acknowledges a “just transition” as one that brings social benefits, including better access to electricity, yet it lacks a dedicated working group to assess people’s needs and the impacts of transition on the population. Several interviewees expressed concern that the insufficient institutional focus on the “just” part of the energy transition indicates that Vietnam’s government may be using the term as a buzzword to justify a policy primarily focused on energy security.

The public feedback notes published by the **South African** and **Indonesian** JETP Secretariats show that stakeholders questioned the existing financing model’s ability to drive economic development in remote rural areas and help vulnerable groups by improving access to electricity and creating jobs.<sup>94</sup> For example, they raised concerns over the potential of renewable energy deployment in areas where lower profits are expected, or the scope to prioritise small-scale projects that promote rural development and ensure equitable social change.<sup>95</sup> However, it is currently unclear whether and how these concerns will be addressed when the JETP projects are funded and enter their implementation phase. Without a comprehensive strategy to tackle the issues of undue influence and regulatory capture, the JETPs risk perpetuating existing inequalities and failing to achieve their intended equitable outcomes.

For example, **South Africa’s** JET IP considers alternative models of electricity generation ownership. While these models aim to increase renewable energy deployment in the country, the alternative ownership models are perceived to promote independent power producers (IPPs). Previously, IPPs have sold power to Eskom at predetermined rates, resulting in renewable energy deployment that predominantly follows a private-sector business model.<sup>96</sup> Therefore, there is a strong public and institutional opposition to IPPs, due to fears of privatisation.<sup>97</sup> In addition, IPPs are often owned by foreign companies or South African elites,<sup>98</sup> which risks concentrating energy resources in the hands of a few, while disproportionately disadvantaging poor workers and communities. The JET IP does not include detailed measures on how, for example, coalmining communities could become owners and beneficiaries of the construction and operation of renewable energy technologies.<sup>99</sup> This exacerbates fear of growing inequalities and fuels mistrust among those who see the transition as favouring the privileged at the expense of the marginalised.

These points indicate that projects financed within the JETP framework must be protected from undue influence. As large-scale projects receive funding, meticulous approval processes are necessary to minimise social and environmental consequences. Government agencies should avoid fast-tracking processes to award licences for projects, and ensure that independent environmental and social impact assessments are conducted. As mentioned earlier, corrupt actors can take advantage of weak oversight at project level, to circumvent independent assessments and community consultations, resulting in approvals that overlook or downplay the potential negative impacts of projects on communities and ecosystems. The Public Feedback Response Matrix for the CIPP published by JETP **Indonesia** indicates that stakeholders are concerned about project-level integrity. However, little detail is currently known about how projects within JETP are to be protected against integrity violations. CSO representatives hope the JETP will set new standards in Indonesia’s energy sector, necessitating improvements in project licensing and approval processes.

While JETPs are still in their early stages, it is crucial to have a comprehensive understanding of what a just transition entails, how oversight and monitoring of the process will be ensured, and how JETPs will continue to uphold these principles. Without strong safeguards against undue influence, it will be challenging to ensure that the justice-related aspects of each agreement are not overlooked, and that the process is not co-opted by JETP country governments merely to justify energy transition policies.<sup>100</sup>

## RECOMMENDATIONS:

- JETP governing bodies should adopt a formal framework for detecting, reporting and managing conflicts of interest throughout JETP planning and implementation, ensuring transparency and accountability across all decision-making processes.
- JETP country governments should ensure that permit-issuing, licensing and procurement standards are updated where necessary, to meet the values of the just energy transition.
- JETP governing bodies and project implementers should ensure comprehensive monitoring, reporting and public disclosure of information on JETP implementation at national and project levels – in particular, an assessment of the “justice” element.

# CONCLUSION

This report marks an essential step toward identifying the governance and corruption risks that could undermine a just energy transition through JETPs. As global climate finance mechanisms, JETPs hold significant potential to advance both emissions reductions and social equity. Yet without robust safeguards, these initiatives risk reinforcing existing inequalities, eroding public trust in climate action, and failing to deliver the promised benefits to marginalised communities. The illustrations from South Africa, Indonesia and Vietnam presented in this report provide valuable insights into areas where JETP governance can be strengthened to promote transparency, accountability and public participation in the energy transition process.

Strong anti-corruption measures are critical to achieving a just energy transition via JETPs. The key findings from this report highlight the urgent need for a more comprehensive integrity framework and enhanced

oversight mechanisms within JETPs. There is also pressing need for greater transparency and deeper stakeholder and public engagement. Governments, donors, private-sector actors and financiers must commit to these principles. Only through a firm commitment to anti-corruption standards and the promotion of participatory, accountable practices can JETPs ensure no one is left behind.

The international community now has a unique opportunity to build proactively on the experiences of South Africa, Indonesia and Vietnam to improve both current and future JETP agreements. By integrating lessons learned and strengthening governance frameworks, JETPs can become a model for climate finance that prioritises justice, integrity and fairness. The recommendations in this report chart a course for realising these goals, laying the groundwork for a more equitable and transparent global energy transition.







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