



Transición Energética Justa EN AMÉRICA LATINA

Technical Report - ETF Project

**Navigating the Just
Energy Transition in
Latin America towards
GST2: A stakeholder
and policy analysis of
Argentina, Brazil,
Colombia, and Mexico.**

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Abstract

*This technical report was prepared as part of the project entitled: **Latin America facing GST2: strengthening its role in the transition away from fossil fuels**, executed by the energy division of Argentina 1.5. The project is based on the certainty of the region's potential for a just energy transition and calls for cooperation among countries and multiple actors to mobilize domestic and international political positions toward paths consistent with the Paris Agreement. To do this, it relies on four regional cases: Argentina, Brazil, Colombia and Mexico.*

The report involves document review and data collection of official policy documents at the national level, such as national plans, strategies, as well as international documents, National Determined Contributions (NDC), Biennial Transparency Reports (BTRs), statements and submissions elaborated by negotiating groups of LAC at the UNFCCC: AILAC and grupo SUR. Also includes a mapping exercise of key stakeholders related but not limited to the energy sector, national energy authorities, UNFCCC negotiators, and NGOs, among others was also conducted.

Key words: Just energy transition - Latin America - GST2 - Argentina - Brazil - Colombia - Mexico



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Introduction

The second Global Stocktake (GST2), set to begin in 2026, presents a crucial opportunity for the collective assessment of progress toward long-term climate goals.

A landmark outcome of the first Global Stocktake (GST1) under Decision 1/CMA.5 was the explicit recognition that a just transition is indispensable to unlocking more robust and equitable mitigation pathways. To drive this systemic shift, the global community committed to a series of historic energy mandates, including tripling renewable energy capacity globally and doubling the global average annual rate of energy efficiency improvements by 2030. Crucially, the decision establishes a clear path toward transitioning away from fossil fuels in energy systems in a just, orderly, and equitable manner to achieve net-zero by 2050, complemented by accelerated efforts toward the phase-down of unabated coal power and the development of net-zero emissions energy systems utilizing zero- and low-carbon fuels well before or by around mid-century. This transformation is to be fast-tracked by scaling up zero- and low-emission technologies, achieving a substantial reduction of non-carbon dioxide emissions globally — specifically targeting methane by 2030— and curbing emissions from road transport. Finally, on the fiscal front, the text calls for phasing out inefficient fossil fuel subsidies that fail to address energy poverty or support just transitions, thereby aligning international public finance with global climate ambition.

The celebration of GST2 coincides with a critical juncture for Latin America and the Caribbean (LAC). As one of the most vulnerable regions to devastating climate impacts, characterized by prolonged droughts and floods, LAC is simultaneously demonstra-

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ting high commitment to multilateralism, evidenced by Colombia's Presidency of the 16th Conference of the Parties of the Convention on Biological Diversity (CBD) in 2024, the Brazilian leadership of 30th Conference of the Parties of the United Nations Framework Convention on Climate Change (UNFCCC) in 2025 and the recent organization of the First Conference on Transitioning Away from Fossil Fuels held in Santa Marta.

While the LAC region has a high potential for leadership in the just energy transition, the geopolitical context has also led to setbacks. Despite the regional rhetoric surrounding a just transition, several major developments in Latin America throughout 2025 and 2026 demonstrate a persistent reliance on fossil fuel exploration and exploitation. In Argentina, the continuous expansion of the Vaca Muerta shale formation has reached record-breaking production levels, driven by the commissioning of new pipeline infrastructure and massive capital injections aimed at turning the country into a major global LNG exporter. Concurrently, Guyana has aggressively advanced its offshore oil production in the Stabroek block, approving new multi-billion-dollar drilling projects that have rapidly elevated its output, while Brazil has pushed forward with controversial plans to explore frontier oil reserves in the ecologically sensitive Equatorial Margin near the mouth of the Amazon River. Colombia has also faced internal legislative and economic pressures to maintain existing exploration contracts to secure fiscal stability and prevent energy shortages. Mexico recently presented a Gas Pipeline Plan that contemplates an investment of 140,905 million MXN pesos by 2030, with the objective of supplying 13 new electric power plants, and fracking is under evaluation.

LAC, as one of the most vulnerable regions to devastating climate impacts, is demonstrating high commitment to multilateralism.

The region has a high potential for leadership in the just energy transition.

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These actions underscore the existing tensions between international climate pledges and domestic fiscal realities, highlighting how the region's economic strategies remain anchored in hydrocarbon revenues. Across the continent, these strategic investments in new drilling infrastructure, deepwater fields, and export terminals solidify fossil fuels as a primary economic driver for the next several decades, presenting a significant setback to the ambition of establishing Latin America as a pioneer in the global energy transition.

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The report involves document review and data collection of official policy documents at the national level, such as national plans, strategies, as well as international documents, National Determined Contributions (NDC), Biennial Transparency Reports (BTRs), statements and submissions elaborated by negotiating groups of LAC at the UNFCCC: AILAC and grupo SUR. A mapping exercise of key stakeholders related but not limited to the energy sector, national energy authorities, UNFCCC negotiators, and NGOs, among others was also conducted.

The report also comprises a mapping and assessment of key stakeholders based on their institutional presence, the commitment and alignment with the energy transition agenda, the strategic influence in the process, and energy-security-stability nexus. At the same time, and taking into account the intrinsic link between vulnerability, climate risks and adaptation of the energy sector with a just transition, an assessment of mainstreaming of adaptation and vulnerability dimensions in energy positions and priorities is also a key part of the report.

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Using this criteria, prioritized stakeholders are categorized in three groups: critical allies, influential retarder/slowdowns and vulnerable partners. This classification applied to the four cases in this report and is based on the understanding that critical allies are those with influence, and commitment, while acknowledging the nuances that indicate commitment may not be uniform or may vary. An example of this is provided by actors in the executive branch. This same category also includes actors whose influence may vary but whose commitment is high; in certain cases, this can be a game-changer—for example, in the approval or rejection of a project. An example of this is civil society actors. Critical allies are the focus of our interest, insofar as they have the capacity to drive the transition—even with those nuances—or are highly committed, even if they have less influence, such as NGOs. Influential retarder/slowdowns may have influence and reach, but their commitment to and alignment with the Paris Agreement and its long-term goals is weak. Furthermore, this is less likely to change in the short or medium term, given that these actors are the ones driving fossil fuel policy in the country. Therefore, they are not the direct focus of our efforts. Finally, the vulnerable partners are sometimes the most difficult to categorize, as their influence may be low, but so is their commitment. This means they lack a strong discourse associated with the just energy transition. Thus, they constitute a relevant middle ground for our advocacy work. The full methodological approach is part of Annex I of this report.

The analysis involved a desk review of key literature and news, the creation of databases with actor information, and the execution of eight interviews during April, May and June 2026 with key representatives of civil society organizations. In order to protect the identity of the key informants, the interviews were anonymous and followed Chatham House rules.

1. Energy transition in Argentina

The National Greenhouse Gas (GHG) Emissions Inventory of Argentina¹ shows the emissions breakdown as follows: 50% Energy; 25.5% Agriculture and livestock; 12.8% Land use, land-use change and forestry (LULUCF); 5.9% Industrial processes and product use; and 5.8% Waste. In terms of evolution, emissions for the energy sector from 1990 to 2022 peaked between 2013 and 2016 (205.13 MtCO₂e), fell sharply in 2020, and rebounded over the following two years. The country's largest provinces by economic activity show similar sectoral emissions patterns to the national profile in 2022: Buenos Aires had 59% of emissions from the energy sector; Santa Fe, 51%; and Córdoba, 47%.

Regarding Argentina's NDC, a NDC 3.0 was prepared in 2025 but has not yet been submitted to the UNFCCC. The current official document remains the NDC 2.0 submitted in 2020 with an adjustment in 2021² for mitigation, which specifies that the country will not exceed net emissions of 349 MtCO₂e in 2030 (validity period: 1 Jan 2021–31 Dec 2030). Thus, Argentina maintains an absolute, unconditional target—consistent with its NDC 1.0 2016 approach—covering the entire national territory and all economic sectors, with a 2030 horizon.

*Argentina has a National Energy Transition Plan to 2030, approved in 2023. However, the country has **not committed to a fossil-fuel phase-out.***

¹ National Greenhouse Gas Emissions Inventory System of Argentina: <https://inventariogei.ambiente.gob.ar>

² Argentina NDC2 <https://unfccc.int/sites/default/files/NDC/2023-12/Argentinas%20Second%20NDC.pdf>

Although the current NDC does not include a specific pledge for the energy sector, it states that the country will advance an energy transition by 2030 and considers natural gas a transition fuel. The NDC does not adopt a narrative or direct measures specifically tied to a just energy transition; references to just transition are limited to a transversal, as well as a labor-focused approach. This is reflected in the country's first Biennial Transparency Report (BTR1)³, submitted in 2024 as expected.

Argentina has a National Energy Transition Plan to 2030, approved in 2023 (Resolution 517/2023, Ministry of Economy, Secretariat of Production⁴). The Plan reflects a national commitment to a clean, just, and sustainable energy transition, including adaptation of energy systems to climate impacts through 2030, as noted in the NDC 2.0. However, the country has not committed to a fossil-fuel phase-out.

The Plan's first guiding idea is that decarbonization effort should be proportional to Argentina's circumstances, noting its historical maximum contribution to global emissions of 0.9% in 2007, with the energy sector accounting for 0.4%. The second guiding idea is that Argentina has energy resources to transition toward a cleaner, more sustainable matrix and to support regional and global supply during the transition—resources that include hydrocarbon basins, hydropower potential, wind speeds, and solar irradiance.

Two other key points are disparities in the quality and security of reliable, affordable energy access across the country and financial and socioeconomic development constraints, including a 39.2% poverty rate in 2022. From Argentina's perspective, a just energy transition therefore requires reconciling foreign-exchange needs, macroeconomic stabilization, and sustainable development.

The Plan's foundations include using gas resources as transition fuels, expanding wind and solar renewables, developing nuclear energy, and strengthening energy efficiency.

3 Argentina. 2024 Biennial Transparency Report (BTR). BTR1. <https://unfccc.int/documents/645001>

4 Resolution 517/2023: <https://www.boletinoficial.gob.ar/detalleAviso/primera/289826/20230707>

Quantitative targets in the Plan are:

- *Not to exceed net emissions of 349 MtCO₂e economy-wide, in line with the 2021 NDC adjustment.*
- *Reduce energy demand by at least 8% through energy efficiency and responsible use.*
- *Exceed 50% renewable electricity generation, in line with Law No. 27.191 and including hydropower.*
- *Reach 2% penetration of electric vehicles in the national vehicle fleet.*
- *Achieve 1,000 MW of distributed renewable generation.*
- *Add 5,000 km of new high-voltage transmission lines.*

This means that they are not fully aligned with the results of the GST1 (Decision 1/CMA.5). Qualitative goals include fostering local value-chain development for clean energy technologies, creating new jobs in the sector, reducing energy poverty, and facilitating a just energy transition.

It is important to note that the change of government and political orientation in December 2023 has represented a significant rollback in environmental and climate policy and legislation in Argentina. While many national and international documents remain officially in place, they are no longer political priorities; the current government has expressed climate-skeptical positions.

Argentina was one of the three founding members of the ABU negotiating group in the UNFCCC in 2016, alongside Brazil and Uruguay. This group has since evolved into Grupo SUR with the addition of Ecuador and Paraguay. Although there were some divergences among members at COP30 in Brazil—raising questions about Brazil's participation—the group continues to coordinate positions to date.

Grupo SUR has been willing to support narratives on a just energy transition. In practice, however, member countries have very different transition models and starting points (energy mixes), which has prevented a unanimous group position on a fossil-fuel phase-out.

Regarding the UAE Just Transition Work Programme, Grupo SUR presented two submissions in 2025⁵. Narratively, the group stated in its February 2025 submission that a just and equitable transition encompasses pathways including energy, socioeconomic, workforce, and other dimensions. In its April 2025 submission—focused on the third dialogue under the UAE Just Transition Work Programme—the group incorporated the dimension of just adaptation, seeking stronger linkages between adaptation and just transition.

1.1 Key stakeholders for energy transition in the country

The stakeholder mapping of Argentina should not be read statically, but rather as a dynamic system of operational and narrative tensions. Since the ascension of Javier Milei to the presidency in late 2023, environmental protection frameworks and climate advocacy are framed as ideologically driven impediments to economic deregulation and free-market development. Consequently, natural resources are considered purely as vehicles for immediate fiscal stabilization, driving structural reforms designed to expand the frontier of high-impact extractivism. This includes the implementation of the “Régimen de Incentivo para Grandes Inversiones”/Incentive Scheme for Large Investments (RIGI) and attempts to dismantle foundational environmental safeguards, such as the reform of the minimum protection standards of the Glacier Law, to clear the path for multi-billion-dollar mining investments in the periglacial environment zone of the Andes.

The ideological shift has resulted in a severe institutional dismantling and a calculated retreat of the state from its climate commitments. The national environmental portfolio was stripped of

⁵ UNFCCC Submissions Portal <https://submissions.unfccc.int/>



its ministerial rank, and under subsequent re-organizations—culminating in Decree 269/2026—was downgraded to a sub-portfolio within the Secretaría de Turismo y Ambiente/Secretary of Tourism and Environment under the Chief of Cabinet's office. This restructuring systematically erased the term and domain of "climate change" from the official national organigram, severely underfunding and decimating the technical teams responsible for territorial enforcement. In the international arena, this domestic rollback translated into an unprecedented diplomatic retreat, marked by the abrupt withdrawal of the Argentine delegation from the COP29 negotiations in Baku, and the reduction of national participation to a bare minimum at subsequent UNFCCC sessions (such as the SB62, COP30 and SB64). By delegating state representation exclusively to the Ministry of Foreign Affairs (Cancillería) and isolating the remaining environmental technical staff, the executive has effectively frozen national climate diplomacy.

The mapping exercise in the case of Argentina started with the identification of 54 stakeholders, of which 40 were then prioritized, distributed as follows: national government, subnational actors, chambers, enterprises, NGOs, unions and interjurisdictional actors. These stakeholders were evaluated according to the selected criteria: institutional presence; commitment and alignment with the energy transition agenda; strategic influence in the process; energy-security-stability nexus; and vulnerability, risk and adaptation mainstreaming in energy positions and priorities. The weights of each actor were assigned according to the criterion and indicators in order to categorize each stakeholder as critical allies, influential retarder/slowdowns or vulnerable partners.

1.2 Stakeholders categories

Critical allies

These actors represent the engines of climate ambition and the enablers of territorial, legal, and technological transformation. They possess the technical rigor, legal weight, or territorial jurisdiction necessary to challenge the central status quo, which, in this case, operate as retarder/slowdowns of the transition.

Energy transition in Argentina

Stakeholders identified as critical allies include: some legislators; the Supreme Court of Justice; some provincial ministries of environment and energy, such as Santa Fe, La Pampa, Buenos Aires, and Jujuy; technological and bioenergy chambers, including Argentine Chamber of Renewable Energies (CADER), Argentine Chamber of Biofuels (CARBIO), and federal platforms and institutions, such as the Federal Investment Council (CFI), the Federal Environmental Council (COFEMA) and the Federal Electricity Council (CFEE); alongside advocacy NGOs: Fundación Ambiente y Recursos Naturales -FARN-, Observatorio Petrolero Sur -OPSur-, Centro de Estudios Legales y Sociales -CELS-, Argentina 1.5, Jóvenes por el Clima, Sustentabilidad sin Fronteras -SSF-, and Asociación Argentina de Abogados Ambientalistas, among others.

Within a fully functioning rule of law, the Supreme Court acts as a critical ally and a vital constitutional check against environmental regressions. However, under a climate-skeptic national administration, this judicial role is under intense institutional and political strain, rendering its long-term enforcement capacity an area of continuous dispute. This actor has high influence and institutional presence, to the extent that there are more cases under litigation, due to disputes between the Executive Branch, the provinces, private actors, NGOs and other actors. However, its commitment to the Paris Agreement and its long-term goals have been variable. In 2019, the Court issued a historic ruling on mining matters contradicting the request for unconstitutionality of the Glacier Law by the Barrick Gold company with the support of the province of San Juan. However, in 2026, faced with a new attack for the modification of the law that had as one of its focuses the exploitation in the periglacial environment prohibited in the law and refuted by San Juan and Barrick Gold in previous years, the Court has played a diffuse role until now.

Regarding the National Congress, Senator Terenzi, chair of the Senate's Environment Commission, could be identified as a critical ally, taking into consideration her position in key discussions as well as the projects she presented. In the context of the discussion



of the Glaciers Law reform, she voted against the proposed amendment and argued that the bill violates fundamental principles of natural resource protection, contradicts the federal system established by the National Constitution (Article 124) as well as openly conflicts with Article 41 of the National Constitution, with jurisprudence from the Supreme Court of Justice of the Nation, and with current environmental legislation ([LaVozdeChubut, 27/2/2026](#)). She also maintains a continuous presence in various national and international climate discussion forums. In 2025, she participated⁶ in the Second Summit of the Parliamentary Observatory (ECLAC), highlighting the need for a legal framework to support environmentally responsible production. Furthermore, in 2024, she participated in the PreCOP29 held in the province of Misiones, where she expressed her concern about climate change denial by certain political sectors, which hinders progress in long-term environmental decision-making ([Valor ambiental, 9/10/2024](#)). Thus, her influence, institutional presence as well as alignment with the long-term goals of the Paris Agreement and JET has been moderate to high depending on the climate discussion. In addition, her narrative links the energy transition to provincial -Chubut- sovereignty and economic stability ([El Chubut, 3/6/2024](#)).

In terms of subnational actors, the bloc identified is diverse and operates via distinct levers that require nuances. While Jujuy stands out as a critical ally—having validated its Provincial Climate Change Response Plan in 2025—its role is intrinsically tied to the extraction of transition minerals like lithium and its solar potential. The provincial administration has turned lithium extraction into a state priority through its public company J.E.M.S.E., triggering prolonged, systemic conflicts with ancestral *Kolla* and *Atacama* indigenous communities over water rights and territorial sovereignty ([FARN, 18/12/2019](#); [FARN, 28/11/2022](#)). This entails a sharp energy injustice: while the province positions itself as a global green exporter, a large part of its local rural population still lacks access to the centralized electricity grid, or relies on limited, high-cost fossil-fuel-based generators. This opacity prompted the national Supreme Court to step in, ordering Salta, Jujuy, and the National State to provide transparent environmental and permitting data ([FARN, 29/3/2023](#); [FARN, 25/2/2025](#)).

6 https://www.instagram.com/p/DNEQJ0SJoVs/?img_index=5

Energy transition in Argentina

Another subnational contradiction worth mentioning lies in the positions adopted by the province of Santa Fe. The provincial government has supported large-scale investment programs at the national level with an extractive focus, is expanding the gas pipeline network under the national paradigm of gas as a transition fuel, and seeks to position provincial companies as suppliers for the large mining projects in the Andes Mountains. At the same time, it has a high-impact policy on renewable energy and energy efficiency, including the Prosumers 4.0 Program, which promotes distributed renewable electricity generation, as well as solar parks, and incentives for households and businesses to promote the energy transition, with a narrative clearly aligned with its recently approved Climate Change Response Plan.

In turn, subnational actors maintain a medium to low institutional presence in international circuits and a medium to high presence at the national level, particularly when cases are close to or at the heart of their territories and/or interests. This latter factor influences their level of impact on decisions, which is high in those areas where they have direct control (such as mining operations) and medium to high in those where they share more responsibility with the national government (hydrocarbon extraction). This also results in their commitments and alignment with the Paris Agreement and the JET being moderate.

The energy-security-stability nexus appears in most of the provinces identified in relation to exploitation in their territories. This is the case of Jujuy, where lithium exploitation is considered a virtuous circle for job creation and social stability. In Santa Fe, energy transition is framed as a cornerstone of regional sovereignty and security. Its narrative argues that producing energy in rural areas (biofuels) reduces dependence on diesel imports, saving foreign currency and guaranteeing the province's economic stability.

In the case of La Pampa, the climate crisis and water management are presented in environmental narratives and documents as matters of peace and environmental justice. The historic claim to



the Atuel River is integrated into its narrative as an example of the need for interprovincial cooperation to mitigate the risks of social instability stemming from climate change. It promotes "Water Sovereignty" as an engine of stability and territorial peace, linking resource availability to the climate security of future generations in the Pampa's region.

Finally, Buenos Aires frames energy transition under the concept of environmental justice, linking social stability and the mitigation of local geopolitical risks (water and food security). The province also promotes bioenergy, biogas, and industrial energy efficiency⁷. Its narrative presents climate action as a tool for social peace, promoting international cooperation and environmental federalism as the basis for the economic stability of the province's most vulnerable communities. Furthermore, Buenos Aires is a co-founder of the Argentine Green Alliance, a network of provinces that uses international commitments as a legal basis to sustain climate action in the face of the national government's setbacks. It is interesting to note that the government of the province of Buenos Aires belongs to a party opposed to the national government, which explains why the position of the province's Minister of the Environment, Daniela Vilar, is more confrontational: "In a context where the National Government is choosing to withdraw from its role in environmental matters, it is essential to consolidate alliances between subnational governments that responsibly assume the challenges of the ecological transition" (Gobiernos de la Provincia de Buenos Aires, 17/7/2025).

It is worth noting that during the periods when the Peronist party—which governs the province of Buenos Aires—held the National Presidency (2003–2007; 2007–2015; 2019–2023), its energy policy was closely tied to energy sovereignty, as it renationalized the YFP company and committed to natural gas as a transition fuel.

The role of some of the chambers on promoting renewables and biofuels is also recognized, including the agreement promoted by CADER with the Climate Group for implementing the RE100 initiative in the country (CADER, 12/7/2024), as well as CARBIO's

⁷ Plan de Respuesta Provincial al Cambio Climático (PRCC).
<https://www.ambiente.gba.gob.ar/mitigacion/plan>

commitment to presenting biofuels as a key alternative in transition scenarios for meeting the 2050 neutrality goals, as well as the NDC. Thus, while these chambers have a moderate influence and institutional presence at the national and international arena, its compromise with the JET is more prominent. Considering the energy-security-stability nexus, CARBIO's narrative frames biofuels as a strategic pillar for energy security and economic stability. It argues that local energy production from agriculture mitigates geopolitical risks associated with fossil fuel imports and strengthens the trade balance, thus guaranteeing the stability of provincial economies. CADER has drafted an Energy Transition Bill that seeks to establish the foundations for decarbonizing Argentina's energy matrix. The proposal was presented not only as an environmental goal, but also as an opportunity for economic development. According to CADER's president Marcelo Alvarez, "We presented it to the government as a business opportunity, a way to generate employment, prevent non-tariff barriers, and promote decentralization and diversification" ([EconoJournal, 2/4/2026](#))

Regarding interjurisdictional and federal actors, their roles, influence, institutional presence, and commitments vary. The CFI is an interprovincial public body established through an agreement between the Argentine provinces. It provides resources and support for developing investment projects. Its work involves the development of a Federal Energy Strategy, currently in the diagnostic phase. As such, its influence can be high in contexts of resource need, while its commitment with JET is tangible but moderate.

COFEMA can operate in highly variable ways, acting as both a critical ally and as a retarder/slowdown, depending on the circumstances. This is because COFEMA is composed of the environmental authorities of the provinces. Therefore, as with the provinces themselves, when projects are of interest or within their jurisdiction, tensions arise between commitment to the Paris Agreement and interpretations regarding resource use and the generation of well-being and employment for their populations.



While it is acknowledged that the selected NGOs do not constitute an exhaustive picture of the universe of organizations committed to the energy transition, the ones mentioned serve as examples. They share a common focus: conducting research, developing specific products, and engaging in national and international advocacy activities that aim to advance ambition in the energy transition with a clear narrative of climate justice and compliance with international commitments, upholding the 1.5°C temperature goal under the Paris Agreement. In turn, some of these organizations focus part of their work and strategy on litigation against the state and the private sector (FARN, Asociación de Abogados Ambientalistas, OPSur, CELS). The organizations mentioned generally have a moderate institutional presence, with some focusing more on national action (OPSur, Association of Environmental Lawyers, CELS), and others on both levels (FARN, Argentina 1.5, Sustentabilidad sin Fronteras, Jóvenes por el Clima).

The narratives complement each other, taking into account the focus of work of each organization. FARN explicitly frames the energy transition as a driver for climate justice, social peace and economic stability, while OPSur argues that dependence on fossil fuels generates economic instability (debt and dependence on foreign exchange) and only decentralized and renewable energy can guarantee long-term social stability. FARN, Asociación de Abogados Ambientalistas and CELS share their focus on democracy and human rights nexus with the narrative on energy transition and socio-environmental conflicts. The narrative of Jóvenes por el Clima links the energy transition to energy sovereignty and security, arguing that reducing dependence on imports stabilizes the national economy.



Critical allies represent the engines of climate ambition and the enablers of territorial, legal, and technological transformation. They possess the technical rigor, legal weight, or territorial jurisdiction necessary to challenge the central status quo.

Sustentabilidad sin Fronteras argues that climate inaction deepens the economic and social vulnerabilities of Argentina's provinces, affecting the stability of local communities. Finally, Argentina 1.5 frames adaptation and just transition as tools for climate justice and geopolitical stability, promoting technical exchange and multilateral diplomacy as a driving force for mitigating geopolitical risks stemming from climate vulnerability, fully integrating the human security dimension into its energy policy proposals.

While many of these actors do not have the power or influence to change the current course of energy policy, this does not diminish their role as allies in promoting the transformations that the energy transition requires.

Influential retarder/slowdowns

These stakeholders are the institutional anchor of the fossil-fuel status quo. They possess veto power and regulatory development capacity on energy policies, but their alignment with the Paris Agreement is virtually non-existent, and their adaptation mainstreaming remains marginal.

This category comprises high-level executive offices (President, Secretariat of Energy), diplomacy representatives (Foreign Affairs Ministry Direction of Environmental Affairs), legislative commissions on mining and energy (Senate and Deputies), key provinces (Neuquén, Río Negro, Salta, Mendoza, Chubut), traditional energy think tanks (Instituto Mosconi), the intensive agro-industrial sector (Asociación Argentina de Productores en Siembra Directa - AAPRESID) sector-specific chambers (Chamber of the Petroleum Industry, Argentine Chamber of Mining Companies -CAEM-), and large energy and mining companies (YPF, Pan American Energy, Total Energies, Arcadium Lithium, Barrick Gold).

Their narrative prioritizes immediate supply security, the expansion of the fossil frontier under the Régimen de Incentivo para Grandes Inversiones (RIGI)⁸, and macroeconomic stabilization via LNG and oil exports.



Security is stripped of its human or climate dimensions and is defined purely as infrastructure protection, asset safety, and fiscal stability for fossil extraction. They enforce an extractivist roadmap that extends the lifespan of carbon assets and transition minerals while ignoring global 1.5°C phase-out timelines.

Within the National Executive and Energy Secretariat, fiscal retrenchment has driven a systematic state retreat from the energy transition, since the beginning of Milei's administration, with renewable energies and energy efficiency being actively relegated from national budget priorities. This has been executed through the deliberate dismantling of strategic funds, including the definitive closure of the Fund for the Distributed Generation of Renewable Energies (FODIS) in 2024, and the operational paralysis of the Fund for the Development of Renewable Energies (FODER), which only executed between 5% and 6% of its income during the first nine months of 2025, diverting public resources to generate financial yields rather than clean infrastructure (Cena Trebuq, 2026: 20). Key decentralized programs have been defunded, such as the Renewable Energy in Rural Markets project (PERMER)—vital for isolated communities—which was entirely deprived of funds in 2024 and 2025 (Cena Trebuq, 2026: 20). Efficiency initiatives in social housing suffered critical under-executions (only 21% utilization) or direct elimination, while the budget line for the "Development of Renewable Energy Promotion Initiatives" was completely erased. This resulted in a staggering 64% real drop in renewable promotion budgets in 2025 compared to 2023. Conversely, for 2025, fossil fuel subsidies were 41.5 times higher than the entire budget for renewables and efficiency. For the year 2026, the national budget allocates \$1.15 trillion ARS to hydrocarbon subsidies (\$651.6 billion ARS directly to extraction corporate supply and \$498.4 billion ARS to demand). This corporate extraction payout alone is 19.1 times superior to all renewable and efficiency allocations combined, and could cover the environmental budget 2.1 times, demonstrating that carbon is a deliberate political choice rather than a macroeconomic necessity (Cena Trebuq, 2026; Laguzzi y Mercure, 2025).

8 The Incentive Regime for Large Investments (RIGI) is a regulatory framework established under Law 27,742 (Ley Bases) that aims to attract domestic and foreign investment projects exceeding 200 million dollars. This regime grants a structured package of tax, customs, foreign exchange, and legal benefits for a 30-year period, applicable to sectors such as mining, hydrocarbons, energy, technology, and steelmaking.

Consequently, these actors share a strong institutional presence and influence, but a complete lack of commitment to and alignment with JET and the temperature goal. In fact, on several occasions, the national government came close to withdrawing from the Paris Agreement, emulating the behavior of the United States, considered a strategic and priority ally. However, there have been significant constraints on this decision, including the incompatibility between withdrawing from the Paris Agreement and the progress of the Mercosur-European Union Agreement.

Another expression of this blocking behavior lies in the positions adopted by some provinces. Governors of key oil, gas, and mineral provinces leverage their constitutional domain over natural resources to promote extractive expansion under the *Régimen de Incentivo para Grandes Inversiones* (RIGI). Neuquén's Governor operates as a critical driver for Vaca Muerta's expansion, declaring the province ready for global hydrocarbon competition ([Ambito, 30/3/2026](#)). Río Negro's Governor, Alberto Weretilneck, maintains a dual narrative; while promoting a future Green Hydrogen Strategic Plan in Sierra Grande, his immediate priority is fossil locking, successfully securing the multi-billion dollar YPF-Petronas LNG plant and the Vaca Muerta Oil Sur (VMOS) pipeline for his territory ([ANBariloche, 25/3/2026](#)). In the mining sector, Salta's Governor utilizes the Regional Lithium Committee to offer legal security to foreign capital, unlocking massive projects like Rio Tinto (Rincón Lithium) and Taca Taca (Copper), under the narrative that "Argentina possesses what the world demands," while neglecting integration of adaptation or provincial climate response plans in his agenda ([Infobae, 11/3/2026](#)). Similarly, the provinces of Mendoza and Chubut utilize their oil, gas, and mining assets to dictate national investment conditions, sidelining international climate commitments in favor of provincial fiscal security.

As for the national legislative power, there are some senators and deputies that contribute to block the progress towards a clean and just energy transition. In this regard, Senator Fama, chair of the Senate's Mining, Energy, and Fuels Committee, plays a strategic role in key discussions regarding the national energy matrix.



The influential retarder/slowdowns are the institutional anchor of the fossil-fuel status quo. They possess veto power and regulatory development capacity on energy policies, but their alignment with the Paris Agreement is virtually non-existent, and their adaptation mainstreaming remains marginal.

Although he has not participated in the UNFCCC in recent years, his institutional influence has been instrumental for enacting laws that define the course of the energy and extractive sectors. His narrative supports the exploitation of critical minerals (lithium) and the strengthening of the hydrocarbon sector, elements he frames as opportunities for national development: "Argentina cannot continue to miss the opportunity to exploit critical minerals" (Eco Medios, 16/12/2025). While he acknowledges the importance of these resources for the global transition, his approach is predominantly productivist and extractive, lacking explicit support for mitigation goals strictly aligned with the 1.5°C target. His push for the reform of the Glaciers Law seeks to eliminate "uncertainties" for investments, prioritizing the expansion of the mining frontier over the climate conservation goals of the Paris Agreement (Eco Medios, 16/12/2025).

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Additionally, Deputy Peluc, chair of the Commission on Natural Resources and Conservation of the Human Environment of the Chamber of Deputies, leads a sensitive commission with a direct impact on strategic sectors such as mining and energy for productive development and environmental policy. His narrative focuses on provincial management of natural resources as an engine of productive development, ignoring the decarbonization goals of the Paris Agreement. By defending reforms that weaken the protection of critical ecosystems (such as the Glacier Law) to favor extractive investment, his position demonstrates a lack of alignment with the 1.5°C mitigation goals and international climate commitments to reduce emissions (La Política San Juan, 16/3/2026; Diario Huarpe, 10/2/2026),

Regarding the mining corporations, such as Arcadium Lithium and Barrick Gold, and the hydrocarbon enterprises, Yacimientos Petrolíferos Fiscales (YPF), Pan American Energy (PAE) and Total Energies, their operations are fundamentally decoupled from public climate goals. The RIGI framework grants multi-billion-dollar projects 30-year fiscal stability, tariff exemptions, and international arbitration rights. This heavily incentivizes and de-risks long-term fossil transport infrastructure—such as LNG maritime terminals and pipelines—which legally binds national infrastructure to oil and gas extraction for three decades, outcompeting and crowding out clean energy grid investments.

When distinguishing these actors, it is crucial to point out that the Vaca Muerta shale formation, located in the province of Neuquén, is the second largest unconventional gas resource in the world, as well as the fourth largest unconventional oil resource. Currently, there are more than 30 investing companies, including national and international capital and joint ventures (Agencia Argentina de Inversiones y Comercio Internacional, 2026).



YPF, as a flagship national company, and Vaca Muerta, as a shale formation, are surrounded by a narrative of energy sovereignty and national pride that transcends the current administration. The so-called Vaca Muerta consensus represents one of the most significant political agreements of recent years, spanning the political spectrum from left to right. This consensus is based on its role not only in meeting domestic demand but also in transforming Argentina's traditional foreign exchange constraints by changing its export profile. In the context of RIGI, YPF recently announced an investment of USD 25,000,000,000 to accelerate the export development of Vaca Muerta ([YPF, May 2026](#)).

In addition to the role of the Vaca Muerta shale formation, it is important to consider the offshore operations in the Austral Basin (offshore in Tierra del Fuego) and its exploratory expansion into the Malvinas West Basin through the French company TotalEnergies, which operates in Argentina as Total Austral, area within the jurisdiction of the Argentine continental shelf. The company is the country's main natural gas producer and has announced that it will add either new platforms or new wells connected to the six existing subsea platforms that already operate in the Austral Basin ([Diario Rio Negro, 2026](#)).

Furthermore, lithium mining isn't framed as part of an energy transition. Instead, it's all about the availability of foreign currency and, in some cases, the supposed spillover effect on local communities, which, as with other mining projects in the country, hasn't materialized. The Andean Wetlands Alliance/Alianza de los Humedales Andinos, comprised of Indigenous communities and environmental organizations, has filed several legal complaints demonstrating the damage to the wetland linked to the Salar del Hombre Muerto salt flat. This includes the drying up of a 5-kilometer stretch of the Trapiche River floodplain and the attempts by mining companies to extract water from the Los Patos River. In 2024, the Catamarca Supreme Court recognized the damage to the river and ordered the provincial government to refrain from granting any new permits for mining activity in the Los Patos River area ([FARN, 2025](#)). However, in 2026 the Court suspended the injunction that prohibited the initiation of projects ([El Ruido, 2026](#)).

Finally, technical and agro-industrial actors reinforce the status quo as well as the narrative of gas as a transition fuel. El Instituto Argentino de la Energía “General Mosconi” (IAE) reinforces this status quo by reproducing the narrative of gas as a permanent bridge fuel and subordinating carbon reduction to traditional fossil self-sufficiency. In its analysis of the project of “Ley Bases” in 2024, the Institute stated that there should be no recoverable hydrocarbons remaining underground before the energy transition is completed. Furthermore, the analysis provided explicit support for RIGI, although it favored its focus on exportable supply rather than on supplying the domestic market ([IAE, 2024](#)).

On the agro-industrial side, while AAPRESID showcases technical alignment with soil carbon mitigation via no-till farming, it defends a high-input, corporate agro-export economic model. This model depends heavily on fossil-fuel-based fertilizers and logistics, resisting systemic transformations that would clip agro-industrial emissions or alter land-use priorities in line with strict 1.5°C pathways.

In both the case of IAE and AAPRESID, these are institutions with moderate to high influence and institutional presence. At the same time, they are vocal in their support for the Paris Agreement and sustainable practices, but their discourse actions, including lobby, are shrouded in significant ambiguity.

Unlike allies, these stakeholders often have the influence and power to both sustain or modify the energy course. However, their unwillingness and even obstruction of change make them a risk factor that must be mitigated, in particular, considering future electoral processes, particularly the 2027 national elections.

Vulnerable partners

These actors exhibit in the current scenario low influence and its commitment with the 1.5°C target fluctuates considering that they lack the institutional teeth, or legal representation needed to shift the trajectory of the core fossil bloc. This is the case of the National Undersecretary of Environment, during this administration.



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This vulnerability was structurally cemented by Decree 269/2026 (published in the Official Gazette on April 22, 2026⁹), which placed the environment area under the Chief of Cabinet (Jefatura de Gabinete) within the Secretary of Tourism and Environment. While an Undersecretary of Environment was created—controlling the national directorates of Biodiversity, Environmental Relations and Cooperation, and Environmental Evaluation and Control—the term and institutional domain of "Climate Change" was omitted from the official organigram, stripping the agenda of dedicated institutional weight at the national level.

The environmental area has not only been stripped of its hierarchical status, but has experienced severe budget under-execution and the loss of specific funds allocated for implementing existing regulations and policies, the loss of human resources, as well as the funding from international cooperation. Lacking influence and institutional presence, insofar as they do not receive the endorsement of higher authorities to convene domestic stakeholders in the Climate Change Cabinet as mandated by Law 27.520, and participate only minimally in the UNFCCC negotiations with decimated delegations, the commitment of some of their permanent technical staff is undeniable, but the institutional role is blurred.

⁹ Decreto 269/2026. 22/4/2026.
<https://www.boletinoficial.gob.ar/detalleAviso/primera/341077/20260423>

2. Energy transition in Brazil

Brazil's updated Nationally Determined Contribution (NDC 3.0) establishes a comprehensive economy-wide target to reduce net greenhouse gas emissions by 59% to 67% below 2005 levels by the year 2035. In absolute terms, this commitment corresponds to an emission level ranging from 1.05 to 0.85 Gt CO₂ eq, calculated according to the most recent national inventory data. Central to this mitigation strategy is the energy sector, which focuses on the expansion of electricity generation and a medium-to-long-term transition involving the gradual replacement of fossil fuels through electrification solutions and the utilization of advanced biofuels. Furthermore, the document highlights the strategic importance of offshore wind energy production, low-carbon hydrogen development, and the implementation of a carbon market as essential components of the national climate framework.

A defining feature of this commitment is the formal inclusion of the Just Energy Transition (JET) as one of the NDC's guiding principles. This version marks the first Brazilian NDC to explicitly address the replacement of fossil fuels, reflecting a significant shift in national policy. This transition is designed to account for the varying impacts and response capacities of different social groups, ensuring that the adoption

Brazil's NDC 3.0 the first Brazilian NDC to explicitly address the replacement of fossil fuels, reflecting a significant shift in national policy.

of greenhouse gas reduction measures considers social vulnerability and adaptation needs. By articulating sectoral mitigation strategies with broader public policies, Brazil aims to generate significant co-benefits, including biodiversity conservation, the provision of ecosystem services, and a reduction in atmospheric pollution.

Beyond environmental outcomes, the NDC emphasizes socio-economic development through the generation of employment and income, the reduction of social and regional inequalities, and the promotion of food, energy, and water security. Crucially, the policy framework includes guarantees for the rights of traditional peoples, local communities, and indigenous peoples throughout the transition process. To operationalize these goals, Brazil will elaborate specific National Adaptation and Mitigation Strategies, which include sixteen sectoral plans dedicated to adaptation and seven focused on mitigation, alongside various cross-cutting initiatives to ensure cohesive implementation.

According to Brazil's Biennial Transparency Report (BTR), the current iteration of the Nationally Determined Contribution (NDC) reinforces a structured pathway toward decarbonization by establishing specific emissions ceilings for the coming decade. The country has committed to an emissions limit of 1.32 Gt CO₂ eq and 1.20 Gt CO₂ eq by 2025 by 2030, utilizing the Global Warming Potential values from the Fifth Assessment Report (GWP-AR5) across all economic sectors. These targets represent a significant reduction of 48.4% and 53.1%, respectively, when measured against the 2005 baseline. This progression is grounded in the most recent national greenhouse gas inventory data, which serves as the statistical foundation for assessing Brazil's compliance with its international climate obligations.

Regarding the energy sector, the BTR highlights an initiative to achieve an estimated 45% share of renewable energies within the total energy matrix by 2030. While this objective remains a cornerstone of the national strategy, it is framed within a historical continuity that traces back to the country's first NDC submitted in 2016. The persistence of this target underscores the long-term



The 2026 Sectoral Energy Plan serves as a cornerstone of the broader Plano Clima Mitigação, functioning as a primary instrument under the umbrella of Brazil's National Climate Change Plan (Plano Clima). This institutional architecture organizes the national climate response into two main pillars: a mitigation axis and the National Adaptation Strategy. While the mitigation component focuses on decarbonization trajectories, the adaptation branch is supported by sixteen sectoral and thematic plans, complemented by five cross-cutting strategies, addressing Just Transition and Climate Justice among others.

nature of Brazil's energy planning, though it also invites critical analysis regarding the evolution of ambition in light of newer technological advancements and global climate demands.

Furthermore, the BTR emphasizes the integration of social equity through the lens of a Just Transition, specifically aiming to mitigate potential negative impacts on vulnerable populations during the transformation of the energy system. This social dimension is inextricably linked to national adaptation strategies, particularly concerning the hydroelectric sector. Given the country's heavy reliance on water resources for power generation, the report identifies specific vulnerabilities within hydroelectric systems and stresses the necessity of robust adaptation measures. By addressing these climate-induced risks, Brazil seeks to ensure energy security while simultaneously protecting the rights and resilience of those social groups most susceptible to the systemic shifts required by the global energy transition.



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In terms of mitigation ambition, the Sectoral Energy Plan evaluates the impact of Brazil's NDC 3.0 by comparing two distinct scenarios—a baseline and a more ambitious pathway—to assess their respective repercussions on emission trajectories through 2035. A central element of this strategy is the replacement of fossil fuels, which the plan explicitly categorizes as an "impactful action" due to its role as a direct intervention in both the national energy matrix and industrial production processes. This transition is framed within a specific definition of a "Just and Inclusive Energy Transition," which seeks to align technical decarbonization with social equity. Furthermore, the plan identifies that these mitigation interventions generate significant co-benefits that enhance overall resilience and adaptation capacity.

The synergy between these efforts is codified in the National Adaptation Strategy, where the energy sector is assigned specific socio-economic mandates. A primary target within this framework is the guarantee of energy security, stipulated to be achieved in a sustainable and accessible manner. By integrating the technical requirements of fossil fuel replacement with the social imperative of accessibility, the 2026 policy cycle attempts to bridge the gap between greenhouse gas reduction and the protection of energy systems against climate-induced vulnerabilities.

Energy transition in Brazil

Since 2023, following a government administration that was openly dismissive of climate change, Lula Da Silva's agenda has been focused on restoring Brazil's role as a climate leader, given that the country was set to host the G20 in 2024, the BRICS Forum and the COP in 2025. However, there are persistent conflicting positions within the government regarding the expansion of the country's oil frontier, particularly in highly sensitive areas. These contradictions have also been reflected in the government's group participation in the UNFCCC.

Like Argentina and Uruguay, Brazil was one of the founding countries of the ABU group in 2016, a space that evolved into Grupo SUR, encompassing Ecuador and Paraguay. As stated before, Grupo SUR has been willing to support narratives on a just energy transition, however, each country has different transition models and starting points, preventing a unanimous group position on a fossil-fuel phase-out.

In the previous section, on Argentina, mention has already been made of the submissions prepared by Grupo SUR regarding the Work Programme on Just Transition. Additionally, Brazil presented a submission to the JTWP in 2026, focusing on that the JTWP must now evolve from a phase focused on high-level dialogues to a phase oriented toward implementation, by enabling substantive engagement on its mandate, governance, functions and potential workstreams. The text focuses on the recently established just transition mechanism and on international cooperation. There is a clear omission regarding the phase-out of fossil fuels, a contentious issue in the work programme.



2.1. Key stakeholders for energy transition in the country

In line with the patterns noted in other cases in this report, Brazil displays a diverse range of stakeholders regarding their commitment to a just energy transition. On this basis, the analysis identifies stakeholders engaged in initiatives that aim to facilitate a just energy transition and actors which challenge progress along this path. Furthermore, the analysis outlines stakeholders who are committed to a just energy transition but lack sufficient institutional resources to advance in this regard.

Initially, 95 actors were identified from the National Executive Branch, the National Legislative Branch, subnational entities, academia, banks, joint ventures, the private sector, NGOs, and universities. This identification was also based on the work carried out in 2025 in a technical report by the Argentina 1.5 team, which mapped actors to understand their influence on shaping domestic narratives related to the energy transition ([Bueno et.al, 2025](#)). While the conclusions of this mapping may be applicable in some cases, the criteria used are not exactly the same. The 2025 report focused on the correlation between influence and commitment, whereas this study has expanded to five criteria with a greater number of indicators. Therefore, the identification of stakeholders remains relevant but is also more diverse.

Subsequently, 40 stakeholders were prioritized distributed between the national governmental, subnationals, private actors and chambers, NGOs, banks and other key stakeholders.

In the Brazilian case, the widespread involvement of actors within the national executive branch in the energy transition is particularly noteworthy. This is evident in the fact that half of the actors in the extensive mapping are affiliated with this branch of government.

Ministries such as finance, energy, environment, development, foreign affairs, and others have a significant presence on this agenda and, in turn, each contain a considerable number of agencies that respond with varying levels of interest, influence, commitment and alignment with the Paris Agreement and its long-term goals.

2.2 Stakeholders categories

Critical Allies

Within the executive branch, a group of key allies for a just energy transition was identified. These allies are actors who demonstrate a strong institutional presence and advocacy capacity, as well as a high degree of alignment with the commitments of the Paris Agreement and an understanding of the importance of adaptation.

President Luiz Inácio Lula da Silva has played a key role in promoting Brazil's leadership in domestic and international climate policy, including the momentum from the UNFCCC COP30 Presidency and its focus on the Amazon. However, this allegiance is not without nuances. Lula has made it clear that fossil fuels must finance the energy transition, including references to climate justice and a just energy transition in his speeches. He assigns a special role to the state-owned company Petrobras in this framework, from a perspective of sovereignty and autonomy in resource use, affirming that Petrobras' oil revenues are essential for the development of biofuels, ethanol, green hydrogen and other sustainable sources ([Mercopress, 2025](#)).



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This helps explain why Lula has supported new drilling and auctions of new exploration blocks in the Brazilian pre-salt and in the Amazon region ([Agência Brasil, 2025](#)), as well as the fact that in 2024, incentives for gas and fossil fuels reached \$81,5 million ([Arayara, 2026](#)).

In addition to President Lula, the Civil House is a noteworthy landmark. This office, which functions as the chief of staff's office, is responsible for coordinating all statements and actions of individuals within the Executive Branch. In view of this, Casa Civil plays a pivotal role in the design and implementation of energy transition policies, yet they are confronted with challenges that extend beyond the conventional scope of the environmental and energy sectors. Moreover, there are specific decision-making and bureaucratic entities that are institutionally entrusted with the design and implementation of initiatives aimed at the energy transition. The commitment of these actors to the cause of the transition was evident in various multilateral forums as well as in the domestic arena. On the international stage, these actors played a leading role, aiming to establish Brazil as a leader in the field of the energy transition. As highlighted in the technical report prepared by Argentina 1.5 ([Bueno et al., 2025](#)), the involvement of this body was key to Brazil's pursuit of leadership on a just energy transition within the framework of multilateral forums such as G20, BRICS and COP30.

Particularly noteworthy is the role of the Ministry of Environment and especially of Minister Marina Silva, whose narrative and focus on environmental issues in general and climate in particular are emblematic and have earned her disagreements within the cabinet itself. Silva refers to the fossil fuel phase out and the need for a national and international roadmap as an answer to the scientific knowledge and as an ethical response to the climate crisis ([The Guardian, 2025](#)). This has contrasted with the narrative of the Minister of Mines and Energy, Alexandre Silveira ([Apublica, 2025](#)) who proposes the extension of a hydrocarbon mix beyond the middle of the century.

Beyond the disagreements between portfolios in Brazil regarding the transition, various cabinet members and the president have been very vocal about the importance of generating financial mechanisms that can support and promote the transition.

Energy transition in Brazil

Lula referred to an Energy Transition Fund using the oil and gas revenues as part of the national roadmap. The Brazilian model showcases a portfolio of financial solutions, including the National Climate Change Fund as a direct allocation mechanism, a state fund financed with oil profits that summarizes what Lula stated, as well as innovative mechanisms including sustainable sovereign bonds and the Eco-Invest Brazil program to attract private capital. All these mechanisms are mainly led by the Ministry of Finance (Ministério da Fazenda, 2025).

Special attention should also be given to the National Secretariat for Climate Change (SMC) which is tasked with promoting ambitious and urgent climate policies and actions. Its goal is to ensure the decarbonization of the economy, foster sustainable socioeconomic development, ensure a just transition, and strengthen resilience to the impacts of climate change. The implementation of these responsibilities falls under the five departments that make up the SMC. This category also includes the Secretariat for Climate, Energy, and the Environment (SCEM) of the Ministry of Foreign Affairs (Itamaraty), which is responsible for negotiating Brazil's international environmental and energy agenda.

As analyzed in the aforementioned technical report on the energy transition in Brazil prepared by Argentina 1.5, Itamaraty plays a key role in JET policies as the ministry responsible for leading the country's foreign policy on climate and environmental issues. This was particularly evident during Brazil's rotating presidencies of the G20, BRICS and COP30 (Bueno et al., 2025).

This brief overview highlights the diffusion of roles and power given by the numerous ministries involved in developing and implementing climate policies related to the energy transition in Brazil. In addition to those already mentioned, other ministries should be included, such as the Ministry of Development, Industry, Commerce and Services (MDIC), the Ministry of Agriculture and Livestock (MAPA), the Ministry of Cities, the Ministry of Labor and Employment, and the Ministry of Science, Technology and Innovation, among others. While its institutional presence and influence may sometimes be moderate compared to other ministries, a thorough analysis would require evaluating not only all

portfolios but also the departments and areas linked to the JET within each ministry.

Critical allies for initiatives promoting a just energy transition can also be found among members of the legislative branch. The support provided by members of parliament is primarily channelled through the committees involved in the initial phase of law-making on environmental issues, with a particular focus on those related to the energy transition.

According to Farol Verde, an initiative launched by Instituto Democracia e Sustentabilidade (IDS) in partnership with numerous civil society organisations to assess the level of commitment to environmental issues among members of the Brazilian Congress, the legislative branch reports a low compromise with environmental issues in general¹⁰. Nevertheless, it is both possible and necessary to highlight certain institutional and individual efforts that serve to identify key allies in the cause of climate action and a just energy transition. Based on the Farol Verde reports, the political parties in Congress with the strongest commitment to the environment are Partido Socialismo e Liberdade (PSOL), Partido Comunista do Brasil (PCdB), Rede Sustentabilidade or simply (REDE) and Partido dos Trabalhadores (PT). Key figures from these and other parties are involved in the Frente Parlamentar Ambientalista, a multi-party front which was established in February 2007 by federal deputies and senators committed to tackling the growing socio-environmental challenges affecting Brazil and the world. At the individual level, key allies in the Representative Chamber include Nilton Tatto (PT-Sao Paulo), who chairs the aforementioned Parliamentary Front, Fernando Mineiro (PT-RN), author of Bill 4386/24, which establishes environmental safeguards for the installation of wind and solar farms and Duda Salabert (PDT-MG), who chaired the COP30 Special Sub-Committee. Among the senators, Fabiano Contarato (PT-ES) President of the Environment Committee, and Leila Barros (PDT-DF), vice-president of the aforementioned committee and author of the law on the carbon market, are particularly noteworthy.

10 In the latest Total Environmental Convergence Index (ICAt) reported by Farol Verde (2025) for the 57th legislative term of the Federal Chamber of Deputies, calculated for the period from January 2023 to October 2024, the score was 29.10 per cent. This is classified as a 'poor' rating according to the Farol Verde classification system.



Brazil shows a diffusion of roles and power given by the numerous ministries involved in developing and implementing climate policies related to the energy transition.

In the institutional framework of the Representative Chamber, the role of the Environment and Sustainable Development Commission (CMADS) is of particular significance. This commission is responsible for formulating legislation on environmental policy at the federal level, as well as assessing the socio-environmental impact of activities and projects. Since March 2026, the committee has been chaired by Valdir Vital Cobalchini from the Movimento Democrático Brasileiro (MDB). Previously, it was chaired by Elcione Barbalho, also from the same party. During the presidency of Barbalho, the commission adopted a proactive stance in an effort to enhance Brazil's reputation as a climate leader in the pathway of COP30. However, this momentum gradually decreased after the conclusion of the COP and the commencement of the election race this year. The fact that the remaining officials have not yet been appointed serves as proof that the aforementioned statement is true. While it is true that a significant proportion of the committee members demonstrate a moderate to high level of commitment to environmental issues, particularly climate change, it is important to note that the committee also includes members who advocate a transition agenda characterised by obstructionism or denialism.

Despite its comparatively lesser institutional presence and influence, the role of the Special Commission for Energy Transition and Green Hydrogen Production also merits particular attention in view of its specific mandate. This commission has been presided by Arnaldo Jardim (Cidadania-SP) who was the rapporteur for the legal framework on green hydrogen (now Law 14.948/24) and author of the bill that led to the Energy Transition Acceleration Programme (PATEN).

In the wider context of the Senate, it is essential to recognise the crucial role of the Environment Committee (CMA). As previously

stated, this committee is chaired by Senator Contarato, from the PT. The committee is composed of 17 regular senators and 17 alternate senators. The Environment Committee is responsible for issuing opinions on matters pertaining to environmental protection, particularly: environmental protection, pollution control, nature conservation, and the protection of soil, natural and genetic resources, forests, wildlife, fisheries, fauna, flora, and water resources; national environmental policy and system; among others.

At the subnational level, certain critical allies can also be identified based on their institutional presence and the development of significant plans aimed at a just energy transition. However, in each of these cases, actors can also be found working to slow down the transition. The categorization of subnational states relies mostly on their productive structure, which is heavily influenced by the role of the oil and mining sectors in each region. Regarding the dynamic terms, Minas Gerais has established itself as a national leader in the energy transition, with a strong focus on solar energy. This state serves as a central hub for decarbonization, driven by solar energy, biofuels, and sustainable mining.

In addition, the states of Paraná and Rio Grande do Sul can be included in this category. Other states in northeastern Brazil—such as Bahia and Rio Grande do Norte—could also be considered critical allies, given their contribution to the country's energy transition through their significant wind power production. However, this categorization is somewhat qualified by the importance of oil production from mature wells. A similar situation can be observed in other northern states that had historically developed plans and initiatives aimed at the transition but have gradually scaled back their commitments in recent years as a result of the growing exploration and exploitation of new oil fields. In light of this, it would be more appropriate to place these states among the vulnerable allies, a categorization that will be developed further below.

Within the business sector, key partners have also been identified. Specifically, these are companies operating in sectors that are driving the just energy transition in Brazil. In this context, the



following companies stand out: Axia Energy; Engie; CPFL Renovais and Serena. At this juncture, it is relevant to note that Axia Energy (formerly ELECTROBRAS) presents itself as the largest renewable energy company in the southern hemisphere.

With regard to business associations, it should be noted that the Brazilian Wind Energy Association (ABEEólica) and the Brazilian Biofuels Producers Association (APROBIO) score highly on the variables assessed. Alongside these specialized sectoral chambers, the work of the Brazilian Business Council for Sustainable Development (CEBDS), which brings companies from different industries together, should be recognized.

In the sphere of think tanks and action tanks, a variety of critical allies can be identified: the aforementioned Instituto Democracia e Sustentabilidade (IDS), Centro Brasileiro de Relações Internacionais (CEBRI), Instituto Clima e Sociedade (iCS), Talanoa Institute, and Observatorio do Clima that operates as a network of more than 120 organizations. In this regard, it is worth highlighting the active role of Brazilian civil society in climate issues, traditionally focused on mitigation, which, since the tragedy of the floods in Rio Grande do Sul in 2024, has awakened to the importance of maintaining a balanced agenda that includes adaptation. Given the historical activism of NGOs, it is difficult to identify a small number of organizations; some are mentioned below, such as Instituto Brasileiro de Transição Energética (INTE), Instituto de Estudos Socioeconômicos (Inesc), Centro Soberania e Clima (S&C) and E+ Energy Transition Institute (E+é). While these organizations possess a considerable voice in both domestic and international arenas, and its commitment and alignment are undeniable, their capacity to influence decision-making processes at national and sub-national levels concerning the transition remains constrained.

The role of the Getulio Vargas Foundation (FGV) should also be highlighted. In August 2025, FGV Clima entered into a Technical Cooperation Agreement (ACT) with the Ministry of Energy and Mines. As a partner, FGV Clima supports the development and implementation of the PNTE by providing methodological support for the National Energy Transition Plan (Plante) and the National Energy Transition Forum (Fonte).

The Alberto Luiz Coimbra Institute for Graduate Studies and Research in Engineering of the Federal University of Rio de Janeiro (Coppe/UFRJ) plays a key role in projects relating to a just energy transition in Brazil. It provides technical communication channels between various stakeholders involved in JET (national, federal and local authorities, and private sector agents).

Among the academic and research institutions analyzed, the Observatório Interdisciplinar das Mudanças Climáticas (OIMC) at UERJ and the Energy Transition Research Center (ETRC) at UNICAMP operate as allies in accelerating Brazil's energy transition. While they approach the issue from different methodological standpoints, both institutions exhibit a high institutional commitment to the overarching benchmarks of the Paris Agreement. OIMC provides critical qualitative data on climate governance, power dynamics, and social impacts, offering the foundational socio-political evidence required by civil society to champion a truly inclusive and equitable transition. Concurrently, UNICAMP's ETRC functions as a high-influence technological ally, driving applied innovation in green hydrogen, advanced biofuels, and grid decarbonization. Together, these institutions act as enablers, delivering the dual engine of social critique and technological viability necessary to push national climate ambition forward.

Influential retarder/slowdowns

In parallel with the critical allies, the research identified actors with a strong institutional presence and capacity to influence national policy but moderate or low commitments to the Paris Agreement goals. These stakeholders exert considerable influence over the decision-making process and, as a result, have the capacity to either promote or impede the advancement of policies and initiatives targeting the energy transition.

It is important to note that not all stakeholders necessarily oppose or neglect energy transition policies; rather, most of them make transition plans contingent upon the achievement of other socio-economic goals. In this regard, it is noteworthy that within this category, actors can be situated along a spectrum ranging from those who exhibit a moderate commitment to the objectives of the



Paris Agreement to those who demonstrate a lesser degree of commitment. The players who report moderate commitments to Paris Agreement goals acknowledge the significance of transitioning towards a just energy transition, albeit making it contingent on advancements in other economic and social domains. Conversely, actors with limited involvement in the Paris Agreement commitments tend to demonstrate a stronger commitment to sectors associated with a carbon-intensive socioeconomic structure.

In the political economy of Brazil's energy transition, the Ministry of Finance (Fazenda) operates as a critical structural decelerator, creating an institutional drag on the pace and social equity of decarbonization. While not an ideological retarder/slowdown, the Ministry's primary mandate to ensure macroeconomic stability, balance of payments, and fiscal discipline establishes an inherent reliance on the fossil fuel sector. Petroleum exports—particularly from the Pre-salt reserves—constitute an important source of direct fiscal revenues and hard currency. Consequently, the Ministry of Finance routinely stretches the timeline for phasing out indirect fossil fuel subsidies and extending oil exploration frontiers, such as the Equatorial Margin. From its technocratic perspective, maximizing the oil rent in the short-to-medium term is prioritized over an accelerated phase-out, effectively anchoring Brazil's macroeconomic architecture to carbon-intensive revenues to meet stringent fiscal targets.

Furthermore, this fiscal conservatism actively hampers the just dimension of the transition, which inherently requires substantial public expenditure for labor retraining, regional diversification, and targeted energy subsidies for vulnerable populations. Operating

In the political economy of Brazil's energy transition, the Ministry of Finance (Fazenda) operates as a critical structural decelerator, creating an institutional drag on the pace and social equity of decarbonization.

under tight expenditure frameworks, such as the fiscal framework, the Ministry treats social compensation mechanisms for transition-affected sectors as inflationary risks rather than necessary investments. This dynamic is replicated in its governance role over Petrobras, where Finance consistently advocates for maximizing short-term dividend distributions to the National Treasury to curb deficit targets, competing directly with the capital allocation needed for green reinvestment. By favoring market-driven financial instruments—such as sovereign green bonds and carbon markets—over state-led social safeguards, the Ministry of Finance institutionalizes a technocratic transition that prioritizes international competitiveness while defunding the socio-economic buffers essential for a truly just transition.

This does not change the fact that the Ministry of Finance also drives the Ecological Transformation Plan, based on the transition to a low-carbon economy, including six pillars: sustainable finance, energy transition, technological densification, circular economy, bioeconomy and agri-food systems, new green infrastructure and adaptation. The pillar on energy transition involves the expansion of renewable energy at a competitive cost; incentivise and promote technologies for biofuels; expand wind and solar energy in the northeast; ensuring access to electric energy in isolated areas; promote urban bus electrification; develop targets for emission reduction and incentives for sustainable aviation fuels (SAF) and biobunker for maritime transport.

In 2023, Brazil passed a Tax Reform (EC 132/2023) replacing cascading taxes with a unified Value-Added Tax and allowing for additional selective taxation on products harmful to health or the environment with the Ministry of Finance acting as main architect and driver. The reform also introduces a cashback mechanism focusing on low-income households and granting exemptions for essential goods such as food and medicine. Even when environmental protection is a key principle of this reform, some authors assume the reform has left some carbon-intensive goods tax-exempt, such as food and milk, which lead to project an increase in GHG emissions from household consumption (Bicego & Carvalho Pereda, 2026). However, this could be offset by implementing a selective tax on other carbon-intensive goods.



The Ministry of Finance includes the Special Secretariat for the Carbon Market (SEMC), which was officially established on October 16, 2025, via Decree No. 12,677. The Secretariat has been entrusted with the responsibility of developing the regulatory and institutional framework for the Brazilian Greenhouse Gas Emissions Trading System (SBCE), which is Brazil's prospective emissions trading scheme. This system, instituted by Law No. 15.042/2024, establishes an emissions cap, sets emissions limits, and allows trading of carbon credits, imposing compliance obligations on emitters over 25,000 tCO₂e per year, and reporting obligations on emitters over 10,000 tCO₂e per year. This system applies to all sectors but agriculture and it is identified as a key tool for complying with Brazil national and international pledges and goals.

The Ministry of Mines and Energy also plays a pivotal role in the development of the just energy transition plans. In this regard, it is imperative to underscore the ministry's pivotal role in the design and implementation of the National Energy Transition Plan which envisages an energy mix with a strong hydrocarbon presence until 2055 (Observatorio do Clima, 2026). Besides, the Ministry leads the Energy Transition Atlas which involves a detailed mapping of state initiatives in the matter, at the level of activities, guidelines, plans, programs and projects (Ministerio de Minas e Energia, 2025). However, this ministry simultaneously pursues policies and rhetoric that are rooted in the status quo of the oil and gas sector. Consequently, this ministry should not be regarded as a monolithic entity, but rather as a conglomerate of political and bureaucratic players whose interests and actions may not be entirely aligned.

In the context of the legislative branch, the Chamber of Deputies' Committee on Mines and Energy (CME) can be classified under this construct. In consideration of its institutional attributes, the CME debates and votes on the following topics: a) Brazilian mineral and energy policies and models; b) the institutional structure and role of stakeholders in the mineral and energy sectors; c) conventional and alternative energy sources; d) research and exploration of mineral and energy resources; e) forms of access to mineral resources; mining companies; f) energy resource pricing policy and structure; among others. The Committee is chaired by Joaquim Passarinho (PL/PA). It usually acts as an institutional forum for stakeholders in the oil and mining sectors.

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In general terms, the Frente Parlamentar da Agropecuária (FPA) (which comprises almost 300 deputies and 50 senators) is chaired by Pedro Lupion (Republicanos-PR) and functions as a powerful lobby group against environmental issues. During the final months of 2025 and the initial months of 2026, this political front advocated a series of anti-environmental initiatives. The regressive nature of the package has led the Observatorio do Clima to characterise it as the "destruction package". These initiatives included Bill 2564/2025 (which restricts the use of satellite surveillance for environmental injunctions) and Bill 5900/2025 (which grants the Ministry of Agriculture the power to veto environmental regulations). In 2025, Congress passed two pieces of legislation of particular significance in relation to environmental policy: the Environmental Licensing Act (15.190/2025) and the Special Environmental Licence (15.300/2025). These legislative acts have been the subject of criticism from various socio-environmental organisations, which have described them as a significant erosion of environmental safeguards over a 40-year period.

A significant number of subnational governments fall into this category of influential retarder/slowdowns. In general, these are States where energy transition projects and initiatives overlap with economic structures based on the oil and heavy industries. Notable examples of this include São Paulo and Rio de Janeiro. These states, which hold the greatest political and economic clout in the country, have developed robust energy transition plans in recent years, along with a complex institutional bureaucracy to support them. In this context, certain northern states can be highlighted as well, as they have initiated ambitious transition programs promoting the generation of renewable energy (Pará and Piauí, for example). However, the recent discovery of oil fields in the Amazon coastal basin has prompted a reevaluation of existing climate commitments.

It is essential to acknowledge the role of the actors from the productive sector, especially those connected to the oil and gas subsectors, in the ability to impede decisions related to transitions. In this context, Petrobras is a notable player.



Petrobras is implementing President Lula's narrative focused on financing decarbonization through oil revenues, including crude from pre-salt oil fields that involve some of the lowest operational emission intensities in the world.

Even though Petrobras is driving a transformation in its operations and energy use, moving towards the goal of achieving net-zero greenhouse gas (GHG) emissions from its activities, it assumes that it is possible to combine leadership in a just energy transition with the responsible exploration and production of oil and gas in the country. The company is implementing President Lula's narrative focused on financing decarbonization through oil revenues, including crude from pre-salt oil fields that involve some of the lowest operational emission intensities in the world. Furthermore, it is leading the concept of ensuring energy security and inclusive social development as key mechanisms for a just transition. This narrative is also shared by the Ministry of Mines and Energy, with which Petrobras has a direct link.

Vulnerable allies

In the political economy of Brazil's energy transition, the category of vulnerable actors encompasses stakeholders who are structurally tied to the fossil-fuel economy and possess a low active commitment to the Paris Agreement, yet do not act as ideological retarder/slowdowns.

Among these cases, particular mention should be made of those actors who operate within broader institutional environments or frameworks that are characterized by blocking or retarders positions, thereby impeding the progress of these initiatives. Among these, the National Secretariat for Energy Transition and Planning (SNTEP) at the Ministry of Mines and Energy, the Secretariat for the Green Economy, Decarbonisation and Bioindustry (SEV) at the Ministry of Development, Industry, Trade and Services (MDIC), and



the Under-Secretariat for Ecological Transformation at the Ministry of Finance are particularly noteworthy. Thus, and being under the orbit of another agency, the influence of these stakeholders is relative and their commitment is subject to the narrative assumed by the agency in which they are incorporated, even when their positions could be more progressive regarding JET.

Another example includes the municipal governments of the carbon-mining regions in Santa Catarina—such as Criciúma and Treviso—alongside independent freight transport operators (caminhoneiros). For these subnational and small-scale economic actors, international climate targets represent an existential threat to local fiscal survival and immediate livelihoods rather than a strategic opportunity. Lacking the budgetary flexibility, technical capacity, and access to subsidized credit lines necessary to finance economic diversification or fleet renewal, their institutional alignment with decarbonization mandates remains low. They operate under a survival-oriented framework where the immediate costs of a phase-out—such as the loss of local coal royalties or rising diesel prices—far outweigh the distant benefits of a green economy, rendering them structurally unable to adopt climate priorities without facing socio-economic collapse.

Similarly, some labor organizations within the fossil fuel value chain, such as factions of the United Oil Workers Federation (FUP) and the National Federation of Oil Workers (FNP), exhibit a defensive and material-driven vulnerability. While these groups rarely oppose renewable energy on ideological grounds, their commitment to the Paris goals is severely constrained by the immediate imperatives of job security and energy affordability. For labor unions, the rapid de-escalation of Petrobras's refining and offshore operations triggers a rational resistance rooted in the fear of structural unemployment and the precarization of labor, as renewable energy sectors in Brazil currently lack comparable union protections and wage standards.

The postgraduate program “Energy Transition: New Businesses and the Future of Energy” (Pontificia Universidade Catolica de Minas Gerais (PUC-Minas) and Pontificia Universidade Catolica do Paraná (PUCPR); Mack Integridade's Energy, Sustainability, and Economy Center (Mackenzie Presbyterian University) fall into the category of



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vulnerable partners. While these entities are not ideological retarder/slowdowns—as they actively embrace the inevitability of the green economy—their alignment with the deeper socio-distributive goals of the Paris Agreement is structurally constrained by market logic and regulatory compliance. They approach the transition through a profit-driven lens focused on commercial viability and corporate asset restructuring, meaning its commitment to climate action is contingent upon capital returns and market opportunities.



Some vulnerable partners approach the transition through a profit-driven lens focused on commercial viability and corporate asset restructuring, meaning their commitment to climate action is contingent upon capital returns and market opportunities.

3. Energy transition in Colombia

Colombia's updated Nationally Determined Contribution (NDC 3.0) sets a definitive mitigation ceiling for the year 2035. Under this pledge, the nation commits to a maximum emission level of between 155 and 161 Mt CO₂ eq. A critical component of this mitigation strategy involves the reduction of black carbon emissions, which are targeted to reach between 6,130 and 8,873 tons by 2035 when compared to the 2014 baseline, notably excluding the variables associated with forest fires (p. 21). These objectives are deeply embedded within the energy sector, where the mining-energy industry is prioritized as a cornerstone of the NDC's implementation. A defining feature of this approach is the Just Energy Transition (JET), which operates as a guiding principle and a central axis for the sector, particularly regarding its structural linkage to fossil fuels (p. 6).

Beyond mitigation, the NDC 3.0 integrates energy dynamics into its adaptation agenda, specifically through Priority 9, which focuses on energy sovereignty and democratization (p. 63). This priority is systematically aligned with the targets of the Global Goal on Adaptation (GGA) and the strategic "bets" formulated within Colombia's Long-Term Strategy (LTS), ensuring that the transition fosters not only environmental sustainability but also social equity and systemic resilience within the global climate governance regime (p. 66).

Colombia's NDC 3.0 shows that climate action is not only about reducing emissions but also about creating a fair and resilient energy transition that benefits both people and the environment.

Colombia's first BTR submitted in 2024 establishes a technical roadmap that reinforces the nation's commitment to mid-century carbon neutrality. Central to this strategy is a mitigation pledge to limit emissions to a maximum of 169.44 Mt CO₂ eq by 2030, a target that represents a 51% reduction relative to the baseline projection. This commitment anticipates a structural shift in the national emission profile, initiating a definitive downward trajectory between 2027 and 2030 to align with long-term climate goals. Furthermore, the BTR details specific targets for short-lived climate pollutants, aiming for a 40% reduction in black carbon emissions by 2030 compared to 2014 levels. In the energy sector, the report outlines an ambitious expansion of non-conventional energy sources with a target of reaching 6 GW of capacity. This expansion is inextricably linked to the framework of a JET, which is designed to ensure labor and productive diversification throughout the decarbonization process. The JET is categorized as a vital component of the broader socio-ecological transition portfolio, serving as a facilitator for the shift toward clean energy and maintaining consistency with both the National Development Plan 2022-2026 and specialized national JET strategies.

Regarding climate resilience, the BTR utilizes the Integral Sectoral Climate Change Management Plans (PIGCCS) to identify and address specific sectoral effects, risks, and threats. This adaptation framework is supported by a monitoring of the adaptation priorities originally established in the 2020 NDC. Specifically, the report provides a detailed follow-up on adaptation measures within the mining and energy sectors towards a sustainable energy matrix.

The 2025 Roadmap for a JET in Colombia introduces the policy landscape characterized by a notable divergence between domestic energy action commitments and the formal pledges outlined in the nation's most recent NDC. While the document maintains a normative connection to global climate governance by citing the commitments of the Paris Agreement and the scientific recommendations of the Intergovernmental Panel on Climate Change (IPCC), it reveals a lack of functional alignment with the specific mitigation targets established in the NDC.



Furthermore, the Roadmap stops short of a definitive commitment to the phase-out of fossil fuels, reflecting the structural challenges and economic complexities inherent in the country's energy matrix. Instead, it emphasizes the importance of fuel replacement specifically within the residential sector, suggesting a localized rather than a systemic mandate for decarbonization in the short term. The conceptual framework of the JET is integrated into this roadmap; however, the definition of national vulnerability is linked to external variables, specifically the country's dependence on international scenarios and global market fluctuations.

This perspective indicates that Colombia's transition trajectory remains highly sensitive to exogenous geopolitical and economic shifts, which complicates the internal synchronization of energy planning and climate ambition within the multilateral climate regime.

Within the multilateral climate regime, Colombia maintains a highly vocal presence through AILAC, specifically within the Just Transition Work Programme (JTWP) and the Mitigation Work Programme (MWP). The Independent Association of Latin America and the Caribbean (AILAC, for its Spanish acronym) is a group of seven countries that share interests and positions on climate change at the UNFCCC since 2012.

The collective submissions put forward by AILAC in 2025 and 2026 underscore a common position regarding the transitioning away from fossil fuels in energy systems, advocating for a process that is fundamentally just, orderly, and equitable. These submissions critically highlight a perceived gap in the international dialogue, noting that while the Mitigation Work Programme has progressed, the most crucial topic—the systemic shift from fossil fuel dependence—has remained largely unaddressed within the remaining Global Dialogues.



The narrative strategically intertwines this mitigation priority with essential means of implementation, particularly climate finance, while also addressing energy security and the broader outcomes of the GST. Furthermore, the discourse incorporates significant cross-cutting issues such as public health and the legal weight of the International Court of Justice's (ICJ) Advisory Opinion, thereby reinforcing the intersection between international law and climate governance. Notably, these specific submissions within the MWP framework omit direct references to adaptation or vulnerability, focusing instead on the technical and political mechanics of decarbonization. AILAC's stance is further bolstered by Colombia's 2026 individual submission, in which the country explicitly advocates for the inclusion of the transition away from fossil fuels as a priority topic. This individual action signals an assertive diplomatic effort to accelerate mitigation ambition and ensure that the transition remains a central pillar of the UNFCCC's operational agenda.

The submissions put forward by AILAC in 2025 and 2026 regarding the JTWP reflect the imperative to transition away from fossil fuels within energy systems. According to the group's position, the JTWP holds both the institutional responsibility and the strategic opportunity to ensure these themes are integrated into a coherent normative framework. AILAC argues that for the work programme to remain effective, it must move beyond abstract definitions and address the material realities of decarbonization. In this context, the group introduces critical considerations regarding vulnerability, specifically linking the concept to the socio-economic and technical impacts resulting from the rapid transformation of energy systems. By identifying the transition itself as a potential source of vulnerability, AILAC emphasizes the need for a protective and inclusive approach that mitigates the adverse effects on developing economies, thereby ensuring that the shift toward a low-carbon future does not exacerbate existing systemic inequalities within the multilateral regime.

Across the opening plenaries of COPs 29 and 30, AILAC has maintained a consistent position regarding the global energy transition, arguing that a just transition demands clarity of direction, integrity, and total transparency. The group underscores that justice must be underpinned by an effective redistribution of resources toward communities, workers, and the clean economies of the future.

Energy transition in Colombia

While AILAC celebrates the adoption of a Mechanism for just transitions, it continues to raise essential questions regarding its governance and the elements necessary to ensure its effectiveness and credibility. Therefore, AILAC laments the continued absence of an acceptable text regarding the MWP, a space that has failed to function according to its central purpose of urgently scaling up ambition and implementation during this critical decade.

Finally, AILAC has expressed profound concern that the results regarding the GGA do not reflect the magnitude of current challenges or the positions of the most vulnerable Parties. The group reaffirms its constructive disposition but highlights that the developing world cannot assume the rising costs of adaptation alone; the Global Goal requires adequate means of implementation to move beyond a mere aspiration. The group has increasingly linked these efforts to the International Court of Justice's Advisory Opinion, as a critical path for clarifying State obligations regarding fossil fuels and climate protection. Furthermore, the group asserts that climate action must be accompanied by sustainable development policies that strengthen energy security, ensuring that the transition supports rather than undermines national stability. This approach aligns with the mandates of the GST, particularly regarding the promotion of inclusive and balanced strategies between mitigation and adaptation. However, significant challenges remain in the multilateral process.

3.1. Key stakeholders for energy transition in the country

The stakeholder mapping exercise for the Colombian case began with the identification of 83 national, subnational, companies, banks, trade associations, NGOs, and universities. 40 of these were prioritized, organized into national, subnational, private sector - divided into companies and chambers of commerce-, NGOs, unions, and banks. Of these 40 stakeholders, 20 critical allies, 10 influential retarder/slowdowns, and 10 vulnerable partners. Critical Allies constitute the largest group — reflecting both the breadth of Colombia's institutional architecture on climate and the significant mobilization of civil society and technical expertise around the JET agenda. However, the numerical predominance of allies should not obscure a structural asymmetry: the 10 Influential retarder/slowdowns concentrate disproportionate regulatory, fiscal, and economic power over the energy system.



Actors such as Ecopetrol, ANH, CREG, World Bank and the Colombian Oil and Gas Association retain the capacity to condition, delay, or reframe the pace of decarbonization regardless of the political will expressed by allied actors. It is therefore essential not to reduce this mapping to a simple majority calculation, but to read it through the lens of power: who controls the rules of the game, who allocates resources, and who defines what counts as a transition in practice.

The disagreements observed among these actors do not concern the energy transition itself. Indeed, virtually no major stakeholder openly contests the need for some form of energy transformation. Rather, the main divide lies in questions of distribution and governance: who benefits from the transition, at what pace it should unfold, under what conditions, and at whose cost.

Critical Allies converge around a vision of just transition that combines climate ambition with social equity and territorial rights. Influential retarder/slowdowns, by contrast, tend to support a more technocratic or market-oriented transition that preserves the centrality of hydrocarbon revenues while placing distributional concerns in a secondary position. Vulnerable Partners broadly share the orientation of the allies but lack the institutional leverage or the strong commitment required to shape the process according to that vision.

This distinction is important because support for the energy transition should not automatically be equated with support for a just transition. Failing to recognize this difference may underestimate the influence of actors who endorse decarbonization in principle while resisting its redistributive and territorial implications.

It is also worth noting the implications of the recent electoral process that led to the victory of conservative candidate Abelardo de la Espriella. Although the inauguration is scheduled for August, the transition process is marked by significant tensions with the outgoing administration of Gustavo Petro. This administration can point to one of its achievements as having increased the share of renewable energy in the energy mix from 2% to 10–12% in recent years, including its promotion of the energy community model and phasing out gasoline subsidies (EL País, 2025).

As part of his platform and election campaign, De la Espriella denounced the delays in meeting objectives related to electrical infrastructure, as well as the loss of self-sufficiency in hydrocarbons, including setbacks in natural gas and oil production. To that end, he has emphasized the importance of the Caribbean's role in attracting capital, defending Ecopetrol, and revitalizing various energy sources—including the rehabilitation of the electricity grid through solar, wind, and hydroelectric power in La Guajira—as well as the hydrocarbon sector, which he has no intention of abandoning prematurely. Among the arguments—and as seen in the case of President Lula—De la Espriella has highlighted the importance of financing clean energy sources with revenue from hydrocarbons. Regarding fracking, no outright ban has been proposed; rather, the possibility has been raised of launching pilot projects with safeguards related to the projects' social acceptance, the protection of water reserves, transparent information, environmental baselines, and the preservation of protected areas and zones protected by indigenous rights ([Infobae, 2026](#); [El País, 2026](#); [Bloomberg Línea, 2026](#)).

3.1.1. Stakeholders categories

Critical Allies

Critical Allies concentrate the highest scores across the five criteria analyzed — institutional presence, commitment to the Paris Agreement, strategic influence, link to security/peace, and integration of adaptation — and form the core of Colombia's climate ambition around a just energy transition.



Colombia's energy transition is broadly supported across stakeholders, but its implementation is shaped by power imbalances and competing visions over governance, distribution of benefits, and the continued role of hydrocarbons, with recent political changes likely reinforcing a more gradual, market-oriented transition.



At the governmental level, current President, Gustavo Petro, operates as the guiding axis of the transition process, having incorporated the Just Energy Transition (JET) as a structural pillar of the National Development Plan 2022–2026. Its link to security and peace is explicit: Gustavo Petro has framed the transition as a condition for overcoming war economies and extractive dependencies. The Minister of Environment and Sustainable Development, Irene Velez Torres, and the Office of International Affairs fall within the same line, responsible for national climate policy and representation before the United Nations Framework Convention on Climate Change (UNFCCC), promoting the integration of adaptation in the Nationally Determined Contribution (NDC), Biennial Transparency Report (BTR), and National Adaptation Plan (NAP). The Ministry of Foreign Affairs achieves the maximum score by articulating the energy transition with geopolitical stability, climate justice, and international cooperation. The Inter-Sectoral Commission on Climate Change (ICCC) is the main interministerial coordination body on climate matters: despite a weak link to the security, stability, and peace narrative, its full integration of adaptation and its role in articulating instruments such as the NDC and BTR position it as a critical ally in domestic climate governance. Along the same lines, the Just Energy Transition Working Group of the National International Cooperation System stands out as a formal articulation space between the Foreign Ministry, National Planning Department (NPD), and Presidential Agency of International Cooperation (PAC-Colombia), channeling technical and financial cooperation with high commitment and influence over the country's international positioning.

The Ministry of Mines and Energy joins this category as an actor with an ambivalent position. Its institutional presence and strategic influence are high — it coordinates energy policy, the National Energy Plan, and sector regulatory frameworks, and its participation in national delegations to the UNFCCC places it as a key interlocutor in the transition agenda. Its moderate commitment reflects the tension between the government's climate objectives and the continued exploitation of hydrocarbons as a pillar of state financing. However, according to interviews with informed sources close to the process, the Ministry of Mines and Energy and the Ministry of Environment and Sustainable Development have developed two different roadmap proposals for the phase-out of fossil fuels, indicating not merely a difference in pace but a deeper disagreement over the direction and terms of the transition within the executive branch itself.

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This inter-ministerial competition extends beyond the phase-out debate: overlapping mandates, jurisdictional disputes over energy-climate governance, and significant disarticulation in the interpretation and implementation of the NDCs across ministries point to a fragmented institutional architecture that weakens Colombia's capacity to translate its climate ambitions into coherent policy. Rather than representing a unified governmental position, the energy transition agenda is therefore better understood as a contested terrain within the state — one in which the Ministry of Mines and Energy remains the critical ally with the greatest potential for deepening, but also the actor whose internal tensions most directly condition the advancement of Colombia's JET commitments ([Ministerio de Minas y Energía, 2025](#)).

The Fifth Committees of the Senate and House of Representatives hold direct jurisdiction over energy, mining, environment, and climate change: their strong influence over the sector's regulatory framework is indisputable, although their moderate commitment also reveals gradualist logic conditioned by sectoral and territorial interests. Therefore, while they exhibit ambiguities in their actions, they are critical allies with the greatest potential for deepening if they advance in alignment with the NDCs and in mainstreaming adaptation into their respective agendas.

The Constitutional Court also joins this bloc due to its capacity to consolidate environmental jurisprudence that has incorporated principles of environmental protection, collective rights, and, in some cases, sustainability and climate change approaches.

In the private sector, Interconexión Eléctrica S.A. (ISA) and Ente Nazionale per l'Energia Elettrica (ENEL) Colombia are the actors with the highest overall scores. Both companies present maximum levels across all five dimensions: high institutional presence and influence in electrical infrastructure and transmission networks, high climate commitment to decarbonization, and solid integration of adaptation in their operational resilience strategies and critical infrastructure. It should be noted that their adaptation score is partly driven by operational continuity needs, rather than community-based adaptation or territorial justice approaches.



Within the industry associations bloc, the Colombian Association of Public Services and the Association of Renewable Energies (SER Colombia) show high commitment and strong influence in sectoral regulatory design, though with less integration of adaptation. It has been an active and vocal advocate for renewable deployment and publicly framing renewables as a tool for energy sovereignty. Its president has argued that wind and solar make Colombia "less dependent on importing gas and diesel" (Semana, 2026)—positioning renewables as an enabler of a cleaner system rather than as a direct challenge to fossil fuels. Notably, the association has not taken an explicit public stance on fossil fuel phase-out, organizing its advocacy around energy security and source complementarity rather than decarbonization timelines.

The Antioquia Governorate joins this group for qualitative reasons: it is a subnational actor with high technical and institutional capacity, leadership in renewable energy and hydropower, and active articulation with national energy planning. Its strategic relevance to the Colombian electricity system justifies its classification as a critical ally.

The Caribbean and Island Regional Node combines moderate to high commitment with medium strategic influence, positioning it as an actor with allied vocation but still limited capacity for direct influence on the national regulatory architecture. Its relevance lies in its role of territorial articulation in a region highly vulnerable to climate change and central to wind and solar deployment.

Friedrich-Ebert-Stiftung Colombia (FES) and Stockholm Environment Institute (SEI) Latam are stakeholders with the greatest potential for technical contribution. FES explicitly articulates the links between just transition, social cohesion, and democratic stability, while SEI stands out for its integration of adaptation and its production of scientific evidence used in global climate negotiations. Both organizations operate primarily as knowledge generators and consensus builders, with moderate strategic influence compared to regulatory or corporate actors.

Celsia is positioned as a vulnerable partner in the private sector considering its high climate commitment and growing investment in renewables, but medium strategic influence compared to ISA or ENEL Colombia, and adaptation not yet fully mainstreamed in its business model.

Colombia's Critical Allies are a diverse coalition of government institutions, companies, civil society, and international organizations that strongly support a just energy transition, although internal governmental fragmentation and differing views on the role and phase-out of hydrocarbons continue to constrain coherent implementation.

CAF occupies a particular position in this group, despite its moderate to high commitment and growing involvement in climate finance and adaptation, its portfolio continues to include infrastructure projects of varying climate compatibility, such as natural gas. At the same time, its direct influence over energy policy places it closer to both the category of ally and retarder/slowdown (CAF, 2026; 2024). Its role as a bridge actor, with potential for reorientation toward a more robust mitigation-adaptation agenda, is one of the most relevant nuances of the Colombian stakeholder mapping.

In the civil society and think tank sector, this bloc includes World Resources Institute (WRI) Colombia, Transforma, Polen Transiciones Justas, Natural Resource Governance Institute (NRGI) Colombia, Censat Agua Viva, and the Colombia Free of Fracking Alliance. These actors combine high international presence at the UNFCCC, production of technical evidence aligned with 1.5°C, and a narrative that explicitly links the transition with territorial stability, reduction of conflicts stemming from extractivism, and climate justice. WRI also stands out for their strong integration of adaptation in vulnerability analysis models and resilient energy planning.

Influential retarder/slowdowns

Influential retarder/slowdowns exhibit a high institutional presence and strategic influence over national energy policy, but show low commitment to the Paris Agreement objectives and limited integration of adaptation and the security, peace, and stability dimensions.



Their power of influence is not incidental: these are actors with the direct capacity to define regulatory frameworks, assign concessions, structure fiscal incentives, and slow down — or condition — the pace of the transition.

The clearest blocking bloc is made up of the National Hydrocarbons Agency (ANH) and the Colombian Oil and Gas Association, both with minimum scores in commitment and adaptation. Both prioritize the expansion and exploitation of hydrocarbons as a pillar of macroeconomic stability and energy sovereignty, with no alignment toward a transition away from fossil fuels and no integration of climate risks in their sectoral planning.

The Energy and Gas Regulatory Commission (CREG) forms the regulatory core of this bloc. Although it acknowledges the need to incorporate renewables, its transition narrative remains strongly tied to supply security, economic competitiveness, and short-term system stability, without clear objectives for accelerated decarbonization or robust mainstreaming of adaptation.

In the private sector, Ecopetrol is the central actor of this group. While it has a high institutional presence and influence over national energy policy, its commitment reflects a transition conditioned by hydrocarbon expansion as the guiding logic, with renewables and hydrogen projects as a medium-term bet that does not displace the current fossil exploitation rationale. It should be noted, however, that not all actors within this company are monolithic in their positioning. According to interviews with informed sources, the Ecopetrol workers' union (USO) is internally divided between a harder line defending hydrocarbon expansion and a faction more open to renewable energy integration.

The National Business Association of Colombia operates with a similar logic: high influence in public policy and regulation, but moderate climate alignment and adaptation instrumentalized according to economic competitiveness criteria. Frontera Energy, with moderate presence and commitment, low integration of adaptation, and no climate security narrative, sits at the far end of the blocking spectrum.

The Cesar Governorate joins this bloc due to its high dependence on the coal economy and its ambivalent stance toward the transition: high territorial influence and institutional presence, but moderate commitment and no effective integration of adaptation in its subnational planning.

Energy transition in Colombia

The World Bank occupies a position that may be or not analogous to CAF in this mapping considering that significant climate finance instruments in Colombia coexist with a global portfolio that has not broken from fossil fuel financing. Its 2025 "all of the above" policy shift — explicitly reintroducing gas lending — places it structurally closer to the bridge actor profile than to that of a Critical Ally for just transition ([Reuters, 2025](#)). However, it is included as a retarder/slowdown insofar as it has recently experienced a significant regression in its climate policies, especially with the arrival of Donald Trump to the Presidency of the United States.

Finally, the Centro Regional de Estudios de Energía (CREE) Colombia represents a distinct type of retarder/slowdown: a think tank whose technical influence shapes the boundaries of the policy debate. Its director has publicly argued that Colombia cannot stop producing hydrocarbons while demand exists and has consistently framed gas as a transition fuel and energy security as the organizing principle of the transition ([ACP, 2023](#)). Regularly cited by fossil fuel industry associations and with a strong media presence, CREE's influence derives not from regulatory authority but from epistemic legitimacy — normalizing continued hydrocarbon production under the guise of analytical rigor.

Vulnerable Partners

Vulnerable Partners show low or moderate levels of climate commitment and alignment with the JET, combined with institutional or strategic influence limitations that reduce their capacity to directly influence decisions within the energy system.

The Medellín Mayor's Office reflects this situation, its institutional presence and subnational influence could be moderate to high, but its climate commitment has been conditioned by its articulation with business sectors and traditional energy infrastructures. Although it drives innovation and urban electrification projects, its position regarding the regional energy model is tied to Antioquia's economic dynamics, which limits its margin for action as an agent of autonomous structural transformation.



The La Guajira Governorate presents the peculiarity of combining high territorial influence in one of the epicenters of Colombia's energy transition with moderate to low commitment and limited adaptation. Its position is key to the viability of the JET in the Colombian Caribbean, but is conditioned by social tensions, territorial disputes, and institutional gaps that weaken its capacity for effective climate leadership.

The National Union of Energy Sector Workers (SINTRAELECOL) joins this group with a narrative of labor justice and just transition and high sectoral influence, though with moderate climate commitment and no link to adaptation policies.

Although grassroots communities and organizations were not analyzed, it is worth noting that during the interview process—particularly with the Natural Resource Governance Institute (NRGI)—the heterogeneity of these communities and organizations was highlighted when discussing energy transition. Communities in the states of Cesar and La Guajira initially supported Petro's policies but have become increasingly disillusioned with the process. The study of these communities and organizations may be a factor worth further analysis, along with their connection to the recent electoral process.

Colombia's Vulnerable Partners generally support the just energy transition but have limited influence, uneven climate commitment, and significant territorial, institutional, and social constraints that reduce their ability to shape its implementation.

4. Energy transition in Mexico

According to the third NDC submitted by Mexico in 2025, the country commits to achieving net emissions reductions of between 364 and 404 Mt CO₂ eq by 2035 unconditionally, and between 332 and 363 MtCO₂e conditionally, contingent upon the mobilization of financing, technology transfer, and capacity building through international cooperation. The conditional and unconditional format corresponds to the type of pledge that Mexico has been presenting since its INDC in 2015. This commitment is based on the country's capacity to maintain and increase carbon sequestration in natural sinks, estimated at least 200 Mt CO₂ by 2030.

The black carbon target is also reformulated based on absolute emission ranges for 2035, with an unconditional target of between 35,800 and 39,700 tons, and a conditional target of between 32,600 and 35,799 tons.

Achieving this roadmap means reaching the target of a 35% reduction in GHG emissions by 2030 compared to the business-as-usual scenario established in NDC 2.0, which is equivalent to emitting a maximum of 644 MtCO₂e in gross emissions by that year. This target is reflected in the National Development Plan 2025–2030.

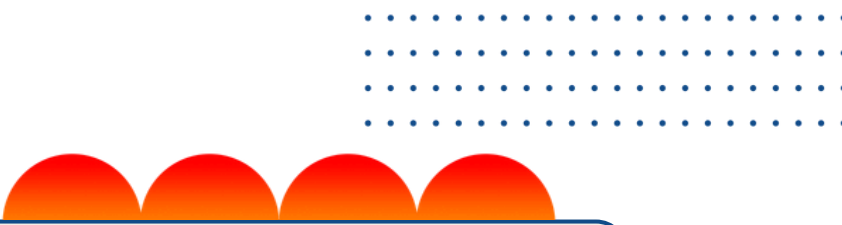
Mexico's 2025 NDC establishes updated conditional and unconditional emissions reduction targets for 2035, aligning its climate commitments with national development priorities and international support mechanisms.

Even though the 2035 mitigation target is presented without sectoral allocations. According to Mexico's National Inventory of Emissions of Greenhouse Gases and Compounds (INEGYCEI) 1990-2023, the energy sector remains the largest, accounting for around 60% of emissions. The “Mexico Plan” (Plan Mexico) establishes thirteen goals for 2030, including investment in clean energy with backup systems. Reference is made to the most significant sectors associated with a just energy transition.

For the transport sector, responsible for 23% of emissions, actions are proposed related to replacing the passenger bus and freight truck fleet with low-emission, electric vehicles powered by biodiesel, EURO-VI diesel, or higher emissions standards. In the aviation and maritime subsectors, the use of low-carbon fuels is proposed, although natural gas is also mentioned. Other measures include the electrification of transport, modal shift, and the development and modernization of infrastructure associated with active mobility; replacing gasoline-powered motorcycles with electric ones; and implementing the National Railway Program through the operation of existing railway lines and the development of new rail and multimodal infrastructure based on clean energy. It is not always clear what is meant by clean energy, which in some cases could refer to gas.

Electricity generation accounted for 19% of the country's total emissions in 2024, associated with the use of fossil fuels such as gas and fuel oil in power plants. According to the national narrative, this is one of the sectors with the greatest potential for decarbonization, in line with JET, by reducing energy poverty, which disproportionately affects women and girls in the country.

The Electricity Sector Development Plan (PLADESE) 2025–2039, published by the Ministry of Energy, outlines three main lines of action to meet the commitments established in the NDC, in conjunction with private sector: clean energy in electricity generation; the replacement of high-carbon fuels with gas in high-efficiency power plants; and the reduction of technical losses in the electricity grid.



Mexico's mitigation pathway prioritizes decarbonizing the transport, electricity, and industrial sectors through clean energy deployment, electrification, and industrial modernization, while its continued use of natural gas illustrates the ongoing tension between climate ambition, economic development, and energy security within the just energy transition.

Furthermore, the PLADESE establishes that the electricity sector will reach its peak emissions in 2027 and that the share of clean energy sources in electricity generation will be around 38.5% in 2030 and 43.3% in 2035. According to the Binding Program for the Installation and Retirement of Power Plants (PVIRCE), approximately 70% of the new capacity installed between 2025 and 2030 will correspond to clean energy sources, primarily solar photovoltaic and wind power. It also includes measures to promote distributed generation and decentralized access to energy, fostering community participation and local development.

The industrial sector accounted for 18% of the country's total emissions in 2024, due to its reliance on fossil fuels in the production of steel, cement, glass, chemicals, and paper. The Mexico 2030 Plan anticipates growth in the sector, with the construction of twelve hubs of well-being in nine strategic sectors and one hundred new industrial parks, which necessitates exploring decoupling alternatives. Among the solutions in the plan are technological modernization, energy efficiency, circularity of materials, the use of clean and renewable energy, the substitution of fossil fuels with biogenic sources and alternative fuels, the electrification of industrial processes, the elimination of the use of substances with high global warming potential in refrigerants, solvents, foams, and electrical systems, and the transition of the cement and iron industries toward low emissions, among others.

The NDC refers to the JET particularly in the context of one of the cross-cutting measures associated with intersectoral and interinstitutional governance that allows the integration of gender, human rights and intersectionality dimensions into mitigation policies, aligning efforts from the national to the local level, and promoting community and participatory governance schemes that foster a just energy transition led by the community.



Mexico presented its first BTR in 2024, which details the progress of its NDC 2.0 submitted in 2022. This NDC raised the ambition from NDC 1.0 to reduce emissions to 30% by 2030 relative to its national baseline, unconditionally, a figure that could be increased to 35-40% with international support. Mexico's baseline is a BAU scenario to 2030 based on gross emissions (i.e., without considering removals). In this scenario, 991,000 kt CO₂e were projected for 2030, making the reduction target for 2030 694,000 kt CO₂e. The BTR also refers to the unconditional target of reducing black carbon emissions by 51% by 2030, and by 70% conditionally.

Regarding the country's assessment of its performance in meeting its commitments, it assumes that the mitigation measures included in the NDC are yielding results and that emissions growth is slowing. However, a drastic increase in efforts is required to achieve net-zero emissions. As of May 2024, the actions included in the 2021-2024 Special Program on Climate Change have reached 58.7% completion and the cumulative progress toward the GHG emissions reduction target is greater than expected according to the BTR.

There are at least 3 references to the just transition in the BTR, but none of them provide specificity about its meaning applied to the precise measures. National energy policy documents such as the Sectoral Energy Programme 2025-2030 (2025) also do not address the just energy transition beyond a mention of the sustainable energy transition and another of the comprehensive, just and sustainable energy transition.

Mexico is not a member of AILAC or the Grupo SUR, but rather belongs to the Environmental Integrity Group (EIG), formed in 2000, along with countries such as Liechtenstein, Monaco, the Republic of Korea, Switzerland, and Georgia. This group is not the subject of analysis in this technical report, as Mexico is the only Latin American and Caribbean (LAC) country which belongs to EIG.

4.1. Key stakeholders for energy transition in the country

Mexico's energy transition stakeholder analysis highlights a widely heterogeneous governance landscape in which institutional presence and political influence do not necessarily translate into strong commitments to an integrated and just energy transition.



Energy transition in Mexico

The mapping exercise began with the identification of 80 stakeholders, including: national government, legislative power, subnationals, universities, banks, private actors, joint ventures and NGOs. Subsequently, 38 stakeholders were prioritized: (6) national government, (2) national legislature, (5) subnational governments, (5) private chambers, (5) private and multinational companies, (10) NGOs, (1) university, and (4) alliances, observatories, and other relevant stakeholders.

The distribution between allies, retarder/slowdowns and vulnerable actors highlights the fragmented nature of Mexico's energy transition governance. On the one hand, some actors with the highest levels of institutional influence and strategic influence continue to prioritize energy sovereignty, fossil fuel continuity, and macroeconomic stability, often relegating adaptation and, consequently, supporting fossil fuels expansion. On the other hand, actors promoting more ambitious and socially inclusive transition pathways frequently possess limited structural leverage over strategic decision-making processes. This does not preclude the possibility, in our study, that these actors could be considered strategic allies.

Across almost all categories analyzed, one of the most significant findings is the persistence of weak or medium levels of articulation between energy, security, and adaptation agendas, particularly regarding the mainstreaming of climate adaptation. This suggests that, despite the growing relevance of climate and energy transition debates in Mexico, adaptation and climate security concerns remain only partially incorporated into institutional and organizational frameworks.

Ultimately, the Mexican case demonstrates that advancing toward a more resilient, equitable, and climate-consistent energy transition will require more than expanding renewable energy infrastructure. It will depend on the ability to strengthen the integration of adaptation across all levels of governance, while also enhancing coordination between governmental institutions, academia, civil society organizations, and territorial actors capable of broadening the transition beyond purely economic and technological objectives.



4.1.1. Stakeholders categories

Critical allies

These actors are key for climate ambition since they possess institutional presence, commitment and alignment with the Paris Agreement and the temperature goal, as well as strategic influence. Adaptation integration and linkage with security and stability agendas differ from actor to actor. This does not preclude acknowledging the nuances we have identified in other cases analyzed, in particular associated with commitment in actors of very high political relevance.

First, we will discuss the case of the national government, specifically the Presidency. At the beginning of her term, president Claudia Sheinbaum presented the document “100 Steps for Transformation,” which outlines the strategic guidelines of her 2024–2030 administration. Within this plan, energy sovereignty for sustainable development is identified as a priority pillar. The document proposes accelerating the transition to clean energy while maintaining continuity of supply and price affordability, as well as strengthening electrical infrastructure to integrate new renewable sources. She also chairs the Interministerial Commission on Climate Change (CICC) and has been an IPCC author. During her administration, the level of commitment is reflected in the political endorsement of the climate targets contained in the current NDC, as well as in the continuity or adjustment of national energy policy. A prioritization of energy sovereignty and the strengthening of state-owned enterprises has been observed, which has generated tensions with decarbonization objectives aligned with the Paris Agreement. Nevertheless, Mexico has submitted all the documents required to the UNFCCC and political statements have included references to the energy transition, although with an emphasis on a gradual transition under state control.

Sheinbaum’s administration has promoted regulatory changes in the energy sector that have favored state-owned enterprises such as Comisión Federal de Electricidad and Petróleos Mexicanos. She has also influenced the cancellation or revision of private energy projects, as well as the direction of public investment in energy infrastructure. Her authority to appoint heads of key agencies reinforces her control over the implementation of energy and climate policy with a clear focus on the role of the state.

Energy transition in Mexico

The administration has linked energy policy to national security, prioritizing energy self-sufficiency as a mechanism to ensure economic stability. Likewise, the government's approach has sought to mitigate social conflicts related to energy projects through state control and centralized decision-making. However, some projects have generated territorial tensions.

Adaptation efforts have been primarily channeled through existing instruments such as the National Climate Change Strategy and sectoral programs¹¹. The President has supported the continuity of these instruments, although the explicit integration of adaptation into energy policy has been limited. Programs related to risk management and resilience have been maintained, but with less political visibility compared to the energy agenda from a mitigation perspective. Inter-institutional coordination has enabled some incorporation of adaptation into public policies, although without a central role in the presidential discourse.

In the same vein, the Secretariat of the Environment and Natural Resources (SEMARNAT) and the Ministry of Foreign Affairs—particularly the Secretariat of Foreign Affairs—stand out, having received high and moderate scores on nearly all criteria. SEMARNAT played a key role in Claudia Sheinbaum's rise to the presidency. These actors represent the segment of the Mexican state most closely aligned with international climate governance frameworks and Paris Agreement objectives. Their relevance lies not only in their institutional presence but also in their ability to connect diplomatic, environmental, and technical dimensions of climate governance.

Mexico's energy transition is shaped by a fragmented stakeholder landscape in which the most influential actors often prioritize energy sovereignty and fossil fuel continuity, while advancing a just and climate-resilient transition will require stronger integration of adaptation and greater coordination across government, civil society, academia, and territorial actors.

¹¹ Adaptation component of Mexico climate policy can be considered in SEMARNAT webpage <https://cambioclimatico.gob.mx/adaptacion-al-cambio-climatico/>

Both agencies played a key role in the preparation and submission of NDC 3.0, as well as in the BTR1, particularly SEMARNAT, which, at the national level, has articulated climate policy through programs such as the National Climate Change Strategy and the Special Climate Change Program. Meanwhile, the Ministry of Foreign Affairs leads climate negotiations and bilateral relations. It is worth noting that, as part of Mexico's participation in the EIG group, it has largely served as the group's spokesperson on adaptation issues. This does not mean, however, that the interconnections between the discourse on energy transition and that on adaptation are no longer compartmentalized. Since COP30, Mexico has been moving closer to AILAC, including through greater informal coordination of positions.

Regarding the linkages between the security and the energy agendas, both agencies have different approaches. SEMARNAT has addressed climate change as a socio-environmental risk factor, incorporating vulnerability analyses into its policy instruments, and promoted actions aimed at reducing impacts on communities and ecosystems, particularly in contexts of environmental degradation. The Ministry of Foreign Affairs has incorporated climate change into the foreign policy agenda as a relevant factor for global stability. It has promoted international cooperation to address climate risks and has participated in multilateral initiatives that link climate and security. Its approach helps position climate change as a matter of global governance.

The Energy Commission of the Senate and the Energy Commission of the Chamber of Deputies maintain a high-level institutional presence and serve as pillars of national energy policy. They are directly involved in the development of key documents such as the Strategy for Transition to Promote the Use of Cleaner Technologies and Fuels. At the international level, representatives from these commissions are often part of the national delegation to the COPs. The Senate, by virtue of its authority in foreign policy, plays a more prominent role in treaty ratification, while the Chamber of Deputies leads the national programmatic agenda. However, the level of alignment and commitment is moderate, as well as strongly influenced by the narrative of energy sovereignty. Although legal instruments reference the Paris Agreement and the NDCs, the recent legislative agenda has prioritized strengthening state-owned enterprises—particularly Comisión Federal de Electricidad and Petróleos Mexicanos—often favoring natural gas as a transition fuel (Mexico, 2026).

In terms of strategic influence, the Senate comprises decision-makers with the power to approve laws governing the energy matrix, as well as to ratify appointments of regulators, while the Chamber of Deputies build the basis of executive decrees, and coordinate forums to inform energy legislation. During the current administration, both commissions strongly link and consider energy policy through the lens of energy security as national sovereignty and economic stability.

Despite the vulnerability of energy infrastructure to climate events, the work of these commissions has focused almost exclusively on mitigation and power generation. There is a notable disconnect between energy and adaptation planning. Legislative discussions rarely integrate physical climate risks to the power grid or refineries as investment priorities. Consequently, these commissions can work both as allies or retarder/slowdowns depending on the case. Their positions reflect the broader ambivalence of Mexico's energy governance framework, where support for renewable energy expansion coexists with strong political and regulatory support for fossil fuel development and energy nationalism.

A similar pattern emerges among subnational actors. The Renewable Energy Agency of Nuevo León, the Secretariat for Energy Development of Tamaulipas, the General Directorate of Energy of Sonora, the Directorate for Alternative and Renewable Energy of Oaxaca, and the State Energy Commission of Baja California all demonstrate high institutional presence and influence, as well as significant support for renewable energy initiatives. However, adaptation and climate security dimensions are only weakly integrated into their policy frameworks. This suggests that, even in territories where renewable energy deployment is advancing rapidly, the transition is still primarily understood through economic modernization and investment attraction perspectives rather than through broader resilience-oriented approaches. Nevertheless, it is important to note that a division can be observed between states more involved in the just energy transition — for example, through the development of solar energy projects — and other states, such as the oil-producing states of the Gulf of Mexico that could be tagged as influential retarder/slowdowns.



For example, Tamaulipas is Mexico's wind energy hub, and Sonoras has a leading national actor thanks to the Plan Sonora, serving as the cornerstone of the current federal government's energy transition policy, with strong international projection. Both Oaxaca and Baja California play a significant role in wind energy development, in the first case, it coordinates the lithium industry and leads the electromobility efforts; while the latter plays a key role mediating socio-environmental conflicts with indigenous territories¹².

Within the private sector, organizations such as the Asociación Mexicana de Energía Eólica (AMDEE), the Asociación Mexicana de Energía Solar (ASOLMEX), and several electromobility and renewable energy associations demonstrate strong support for clean energy development. They have both visibility and high institutional presence, as well as commitment with the Paris Agreement and its temperature goal. Thus, they fully committed to decarbonization, as well as electrification and net zero target. They also have a moderate lobby capacity for passing legislation and supporting public policies aligned with energy transition. However, it can be argued that these two business conglomerates - AMDEE and ASOLMEX-, have not played an active role in opposing the fossil fuel narrative; rather, they have remained on the sidelines. Neither have they acted as advocates of a "no to fracking" position. At the same time, AMDEE and ASOLMEX have moderate integration of vulnerability and adaptation considerations. While the first one considers the resilience of wind infrastructure to hurricanes, integrating physical risks into its sustainability reports, the latest focuses on grid decentralization as a resilience measure against systemic failures caused by extreme weather.

Likewise, companies such as Engie México, Enel, and Iberdrola exhibit medium-to-high levels of climate commitment, as well as high institutional presence at the national arena. Nevertheless, their influence over strategic national energy decisions remains comparatively limited, and adaptation and climate security concerns are only partially incorporated into their agendas.

¹² Information on renewable energy production across Mexican states is available on the ASOLMEX website: <https://asolmex.org/>

Energy transition in Mexico

Mexico's Critical Allies include government institutions, subnational actors, the private sector, NGOs, and academia that broadly support the energy transition. However, despite strong climate ambition among civil society and technical actors, the transition remains largely driven by state priorities of energy sovereignty and fossil fuel continuity, revealing a gap between climate commitment and decision-making power.

The nuances in the private sector is key, since in some cases the same actors play as retarder/slowdowns. For example, Engie Mexico promoted gas as a transition fuel, while, at the same time, supported large-scale renewable projects. Plataforma Mexicana de Carbono (Mexico2) not only has a high institutional presence, but it is also instrumental to achieve México 's NDC. It is also very influential within the industrial sector; establishing market mechanisms for companies to reduce their emissions.

The NGO sector represents one of the most climate-consistent segments of the mapping exercise. Organizations such as Iniciativa Climática de México (ICM), Instituto de Desarrollo, Energía y Ambiente (IDEA), Centro Mexicano de Derecho Ambiental (CEMDA), World Resources Institute (WRI) México, and Greenpeace México display strong alignment with the Paris Agreement, adaptation-related concerns, and climate justice principles. Their work frequently integrates perspectives associated with social vulnerability, environmental justice, gender equality, Indigenous rights, and citizen participation. Some of these organizations are central to technical analysis in the context of limited institutional capacities, having moderate to high institutional presence. Between the 10 NGOs and centers identified, not all have the same influential power that may vary from case to case, including the areas of their expertise: climate finance and budget (GFLAC, Fundar), climate litigation (Nuestro Futuro AC, CEMDA), infrastructure (IDEA), among others.

The Alianza Mexicana contra el Fracking is a coalition of more than 40 NGOs and grass root organizations, and since 2013 has sought to ban the use of hydraulic fracturing (fracking) in defense of water and territory. It is fully and publicly committed to the phase-out of unconventional fossil fuels, and it has succeeded in placing the issue of banning fracking on the agenda of the federal Executive, local legislatures and public in general. Its influence derives from coalition-building, technical analysis, public advocacy, and sustained pressure campaigns directed at Congress, federal agencies, and the executive branch.

The Asamblea de los Pueblos Indígenas del Istmo en Defensa de la Tierra y el Territorio (APIIDTT) is a grassroots community-based organization, however, its presence has extended beyond the local level, participating in international human rights forums and has brought its claims before UN bodies and the Inter-American Commission on Human Rights. The organization is composed of Indigenous assemblies, agrarian authorities, resistance movements, and cooperatives from Zapotec, Ikoote, Mixe, Zoque, and Chontal communities. APIIDTT emerged in response to the expansion of wind-energy megaprojects and has become one of the most visible Indigenous territorial defense organizations in southern Mexico. It is committed to a JET and advocates against large-scale “green” mega projects, supporting decentralized renewable systems, energy autonomy, food sovereignty, and community control over resources.

Universidad Nacional Autónoma de México (UNAM¹³), as another critical ally, constitute the core group most closely aligned with a climate-consistent and justice-oriented transition. Its agenda demonstrates comparatively stronger incorporation of climate justice, territorial resilience, social vulnerability, and international cooperation perspectives, positioning them as important normative and technical bridges between global climate governance and domestic policymaking. Likewise, although UNAM possesses significant scientific legitimacy and agenda-setting capacity, its direct influence over strategic energy decisions remains limited. This reveals a broader structural feature of the Mexican case: actors with the strongest climate commitments and most comprehensive transition narratives do not necessarily possess decisive control over the national energy matrix.

¹³ It is interesting to note that the UNAM was a leading voice in the country regarding the principles of energy justice. With the rise of the new government, that narrative was co-opted.

Influential retarder/slowdowns

The category of influential retarder/slowdown represents the principal space of tension within Mexico's energy governance system. Within the executive branch, both the Secretary of Energy (SENER) as well as Instituto Mexicano del Petróleo fall into this category. Although they display high institutional presence, political influence, and, in some cases, medium or even high levels of climate commitment, their approach to the transition remains strongly conditioned by objectives related to energy sovereignty, macroeconomic stability, and the strengthening of state-owned fossil fuel industries. Consequently, climate mitigation goals coexist with policies aimed at preserving hydrocarbon extraction and reinforcing the strategic role of public energy companies. SENER has maintained clean energy participation targets but has prioritized strengthening fossil fuel-based generation through state-owned enterprises. This has created a gap between Mexico's international commitments and sectoral implementation. In terms of adaptation, SENER has only limitedly incorporated climate risk analysis into energy planning. Some instruments acknowledge the vulnerability of energy infrastructure to climate events, but the integration of resilience measures has not been systematic.

The Instituto Mexicano del Petróleo is a public research center dedicated to research, technological development, and innovation for the oil industry. As such, its work is oriented to optimizing fossil fuel production and exerts influence through technological development and advisory support to Petróleos Mexicanos.

The Asociación Mexicana de Energía (AME) represents the largest private power generators in Mexico and serves as a constant interlocutor with the Ministry of Energy and Congress. However, even supporting energy transition, it has defended the role of natural gas as a backup source, slowing down efforts. It has moderate to high lobby power, in particular in the legislative arena, and its focus on security refers to price stability for industry.

The category of influential retarder/slowdowns also includes strategic energy actors such as the Comisión Federal de Electricidad (CFE) and Petróleos Mexicanos (Pemex). Both institutions possess substantial structural influence over the national energy matrix, yet demonstrate only medium or low levels of climate commitment and relatively weak incorporation of adaptation and climate security considerations. Their understanding of energy security continues to be grounded primarily in traditional notions of self-sufficiency, state control over strategic resources, and geopolitical autonomy. As a result, they embody one of the central contradictions of the Mexican energy transition: some of the actors with the greatest capacity to transform the energy system are simultaneously those most resistant to adopting a fully integrated vision of climate resilience, adaptation, and justice-oriented transition pathways.

CFE is a key player in the development of national electricity policy and maintains a technical presence in international organizations. It is a central state-owned enterprise directly responsible for the operation and development of Mexico's electricity sector. It is legally mandated to carry out the constitutional role of the Mexican state in controlling and developing the national electric industry, including generation, transmission, and distribution of electricity. The CFE operates under the coordination of SENER and is governed by a board composed of high-level government representatives, indicating deep integration into national policy-making structures. It has supported specific renewable projects (e.g., Puerto Peñasco), but its narrative defends the use of coal and gas for system reliability, delaying full alignment with the 1.5°C target. Policy direction associated with the CFE has also emphasized maintaining state dominance and continued use of fossil-based generation (e.g., natural gas and legacy plants), rather than a rapid decarbonization pathway. It frames energy in terms of national security, sovereignty, and economic stability.

PEMEX, as a key decision-maker and executor of fossil fuel energy policy, prioritizes the expansion of fossil fuels and sovereignty based on hydrocarbons as key parts of its narrative; consequently, transition targets are secondary to crude oil production. It links energy strictly to national sovereignty and the stability of public finances. Its focus on adaptation is minimal.

The Observatorio Ciudadano de la Energía (OCE) is another case that can be identified as having medium influence and low to medium commitment. However, its presence in this category refers to its position advocating for gas as a transition fuel including through specific proposals for SENER.

It is worth mentioning the cases of oil-producing states, particularly those in the Gulf of Mexico, such as Campeche, Veracruz, Tabasco, and Chiapas, among others. In the first case, the Campeche State Energy Agency has been an active player in promoting large-scale projects (photovoltaics and plasma gasification). However, it has also been vocal in supporting a gradual transition, considering the development of its own portfolio, which includes both renewable energy projects and the strengthening of the region's traditional hydrocarbon sector. The Veracruz State Energy Agency can also be considered in this category as a technical body with strong ties to the national energy industry, although it maintains a strong narrative focused on energy security based on the exploitation of fossil fuels and natural gas, with a very gradual transition¹⁴.

Vulnerable partners

This category is diffused, given the diverse ways of understanding vulnerability associated with energy transition. This is not unique to the Mexican case. In other words, a vulnerable actor can be one with only little influence, or, as in this case, one whose influence is limited but also whose position in the energy transition is poorly defined. The latter has been our main focus.

Some possible vulnerable stakeholders to mention are subnational actors of carbon and oil regions such as the Carbon Region of Coahuila -Sabinas and San Juan de Sabinas- and local actors highly dependent on oil and with no meaningful influence in the transition process, such as Paraíso or Minatitlán, among others. Although, like other subnational actors, their influence may be debatable, in this case, their dependence on fossil fuels makes them more vulnerable.

¹⁴ State-level data on hydrocarbon production in Mexico are available on the Data México platform: <https://www.economia.gob.mx/datamexico/en/profile/industry/oil-and-gas-extraction-2111>



The case of unions is also interesting to highlight. The Sindicato Único de Trabajadores Electricistas de la República Mexicana (SUTERM)—specifically its branches associated with thermoelectric and coal-fired power plants—and the Sindicato de Trabajadores Petroleros de la República Mexicana (STPRM), while historically wielding significant organizational clout, now have their influence subordinated to the directives of the general management of PEMEX and CFE. They do not participate in the design of the national energy transition or in the planning of the JET. At the same time, their compromise with the Paris Agreement goals has been very low.

Finally, some micro and middle enterprises in the manufacturing and light industrial sector could also be under this category. It includes industrial workshops, small textile mills, and local food processing plants grouped into smaller chambers or grassroots sectors of CONCAMIN or CANACINTRA. They lack the influence to negotiate preferential electricity rates or private power purchase agreements (PPAs). They are required to purchase electricity from the CFE grid (which has a high carbon footprint due to the use of fuel oil and natural gas) and to pay the regulated rates set by the government, with no ability to influence the rules of the wholesale electricity market. Nor do they demonstrate any commitment to the Paris Agreement and its goals.



The Mexican case demonstrates that vulnerability extends beyond limited institutional influence to include deep economic dependence on carbon-intensive sectors. Without targeted support for affected workers, local economies, and small businesses, the energy transition risks reinforcing existing territorial and social inequalities rather than delivering a genuinely just transition.



5. Assessment of integration of climate vulnerability dimensions in energy positions and priorities

A just energy transition transcends the mere decarbonization of energy supply, becoming a paradigm shift that couples emissions reduction with socioeconomic development and territorial equity. Under this approach, the relevance of adaptation and vulnerability is initially evident in the very configuration of energy systems, since the shift towards a low-carbon economy implies a greater share of renewable sources, inherently increasing the energy mix's dependency on climate variability.



Given that each region has unique institutional and financial conditions, the sector's vulnerability must be assessed on a site-specific basis. A generation system that does not account for the physical climate risks of its region compromises energy security and the long-term viability of investments. In turn, the development of renewable energies is conditioned by the risks and impacts of climate change, which directly affect the availability and quality of energy resources depending on the source. For example, the operational performance of a photovoltaic solar park exhibits a specific thermal sensitivity, as the frequency and intensity of heatwaves increase, the conversion efficiency of the modules decreases, reducing the electricity generation associated with this technology.

The transition must be people-centered to avoid exacerbating structural inequalities in regions like Latin America and the Caribbean. In this sense, a just energy transition goes beyond decarbonizing the energy mix, seeking to guarantee universal access to reliable, modern, and affordable energy services. Given that socioeconomic vulnerabilities condition the adaptive capacity of each social group, energy equity is a transversal principle to ensure the integrity of this process.





Likewise, the impacts of climate change, such as the increased frequency and intensity of heatwaves, exacerbate energy demand for thermal comfort, stressing grid infrastructure and increasing the risk of supply disruptions that disproportionately affect the most vulnerable sectors. Consequently, access to resilient energy services is a fundamental pillar of social cohesion, since mitigating energy poverty must integrate not only expanding coverage but also guaranteeing continuity and quality of service to address existing gender and class disparities.

Additionally, for this process to be cohesive, infrastructure planning and the design of new markets must integrate climate projections and National Adaptation Plans (NAPs) systemically. Ignoring these scenarios in the design of a low-carbon economy carries the risk of implementing maladaptive solutions, where mitigation measures end up increasing systemic vulnerability to extreme events. In this sense, a just transition should be understood as a set of structural and behavioral changes that promote the rational use of energy and resilient local development, ensuring that the installed infrastructure remains operational and capable of protecting the population over time.



Despite its significance, the intersection of just transition and climate adaptation remains a largely nascent political frontier, with few nations effectively integrating this nexus within their NDCs and long-term strategies (LTS). It is imperative that countries move beyond fragmented approaches, recognizing that climate action must transition from a collection of isolated efforts into a cohesive, multisectoral strategy. Fostering this strategic alignment is essential to ensuring that decarbonization does not inadvertently compromise resilience. Only by unifying mitigation, adaptation, and social development can we guarantee that infrastructure remains operational, that markets function equitably, and that the transition, beyond achieving low-emission targets, is fundamentally resilient and capable of safeguarding populations against the escalating challenges of climate change.

5.1. Climate vulnerability and adaptation in the energy transition of Argentina, Brazil, Colombia and Mexico



The analyzed NDCs reveal a heterogeneous approach to integrating adaptation and vulnerability into energy systems, despite a clear trend toward convergence. Comparatively, the most recent NDCs from Brazil, Colombia, and Mexico (2024–2025) incorporate the adaptation dimension into the energy sector. These countries go beyond system resilience by linking adaptation to social and territorial factors. Specifically, Brazil introduces protections for vulnerable groups within the energy transition; Colombia advances the link between adaptation, energy democratization, and sectoral planning; and Mexico emphasizes equitable energy access for vulnerable populations, particularly women and children. In contrast, Argentina's 2021 NDC update does not explicitly address the resilience of the energy system, though it mentions the future implementation of sector-specific adaptation instruments. This gap likely reflects the timing of the document's drafting, which predates the more comprehensive approaches, linking energy, adaptation, and social dimensions, seen in the more recent NDCs/NDC 3.0 of its regional peers.



Regarding the BTRs under the Paris Agreement's Enhanced Transparency Framework (ETF), the simultaneous submission of BTR1s in late 2024 provides a consistent baseline for comparison. However, a cross-sectional analysis reveals differences that align with the NDC findings. Argentina remains the only case that does not explicitly embed energy system vulnerability and adaptation into its BTR, relying instead on indirect references by systematizing measures from other instruments, such as its Second Adaptation Communication (ADCOM) and NAP. Conversely, Brazil and Colombia show deeper integration: Brazil focuses on hydroelectric resilience, reflecting its power matrix's structural dependence, while Colombia demonstrates greater mainstreaming of adaptation across its mining and energy sector climate planning.

National energy policy instruments across the region integrate power system vulnerability into their strategic pillars, though a limited coupling with specific climate adaptation targets remains. While Mexico prioritizes the vulnerability of local communities and the rural sector, Colombia exhibits the highest degree of adaptation mainstreaming within its sectoral planning, centering its strategy on mitigating risks associated with international climate variability scenarios.



Argentina and Brazil, conversely, do not explicitly incorporate climate adaptation into its standalone energy policies. However, Argentina ensures strategic alignment between its energy transition roadmap and the objectives defined in the National Climate Change Adaptation and Mitigation Plan (PNayMCC). This approach prioritizes grid resilience from a supply-side security perspective.

Concurrently, the NAP of the analyzed countries explicitly integrate energy sector resilience into their diagnostic frameworks and strategic goals. These documents primarily address the enhancement of operational reliability and energy access under projected climate change scenarios. In conclusion, the adaptation of energy systems is largely framed within the context of energy security and equity, although certain frameworks, such as Argentina's, also emphasize supply diversification and the development of domestic technological capabilities. Within the transition toward a low-carbon economy, the expansion of natural gas infrastructure is incorporated as a strategic line of action in Argentina. While its inclusion in a climate plan may be considered controversial due to the continued reliance on hydrocarbons, the displacement of liquid fuels by natural gas results in a net reduction of the sector's greenhouse gas (GHG) emission intensity.



Mexico has not yet enacted a formal National Adaptation Plan (NAP), but they have a National Strategy on Climate Change including an adaptation component, as well as an Special Programme on Climate Change that incorporates vulnerability and adaptation objectives. The Strategy involves a vulnerability assessment, the identification of strategic axes and actions and a prioritization, all key parts of a NAP.

5.2. Climate vulnerability and adaptation in submissions and statements from AILAC and Grupo SUR regarding the energy transition

While the energy transition encompasses more than the mere substitution of high-emission energy sources with low-carbon alternatives, national submissions and regional statements often overlook the specific vulnerability and adaptation requirements of local energy systems. Nevertheless, certain high-level interventions, such as the 2025 MWP Submission and the AILAC-Grupo SUR Opening Statement at COP30, do incorporate adaptation-centric arguments.



These include energy access and energy security, both of which are fundamental to enhancing a population's adaptive capacity against climate-induced impacts. This disconnect underscores a persistent fragmentation within the international negotiation agenda: climate action is seldom treated as a cohesive strategy centered on the energy transition; instead, mitigation and adaptation continue to be addressed through distinct, siloed frameworks.

5.3. Reflections on climate adaptation and vulnerability dimensions of just energy transition

While climate change adaptation is not typically the overarching focus of national energy planning in the analyzed jurisdictions, an implicit integration of adaptation measures is observed through the enhancement of systemic resilience. Specifically, strategic objectives such as universalizing energy access, ensuring the operational reliability of supply sources, and maintaining grid stability are intrinsically linked to the sector's adaptive capacity. Although this correlation is seldom formalized in policy frameworks, the assessment of local energy matrix vulnerabilities fundamentally underpins the formulation of national strategies. Nevertheless, there remains a critical opportunity to formalize this synergy, ensuring that decarbonization pathways designed from a mitigation perspective are optimized to yield broader adaptation co-benefits.



Ultimately, the implementation of a unified climate strategy, where mitigation and adaptation measures converge systemically, ensures long-term infrastructure sustainability aligned with local technological capabilities and socioeconomic constraints. Promoting this alignment goes beyond mere regulatory compliance, it is a technical necessity to ensure that infrastructure and planning remain resilient in the face of the increasingly volatile climate scenarios projected for the region.

Conclusions and policy recommendations

The GST2 starting in 2026 highlights a mismatch between the international climate diplomacy of Latin American nations and their domestic fiscal-economic realities. While the region showcases highly visible multilateral leadership, evidenced by Colombia's Presidency of CBD COP16 and the organization of the First Conference on Transitioning Away from Fossil Fuels in Santa Marta, and Brazil's hosting of UNFCCC COP30, the macroeconomic strategies of these and other LAC countries remain deeply anchored in fossil fuel lock-in. Strategic state investments throughout 2025 and 2026, such as Argentina's massive expansion of the unconventional Vaca Muerta shale formation through the RIGI framework, Guyana's offshore Stabroek block development, Brazil's push into frontier oil exploration in the Equatorial Margin, and Mexico's expansive Gas Pipeline Plan to fuel new thermal power plants, demonstrate that regional economic security is systematically prioritized over decarbonization targets. Furthermore, this cannot be separated from a global geopolitical scenario characterized by the "drill, baby drill" discourse inaugurated by US President Donald Trump, which goes far beyond rhetoric, including interventions in Venezuela and Iran, both linked to the exploitation and control of hydrocarbon production.

At the same time, national-level policy architectures face severe operational instability, heavily influenced by shifting electoral cycles and ideological swings. This is most prominently observed in Argentina, where the post-2023 administration has actively dismantled environmental portfolios and legislation, stripped the climate change architecture, including national organigrams (culminating in Decree 269/2026), dramatically defunded renewable energy promotion tools (such as FODER and FODIS), and jeopardized participation in multilateral environmental processes.

For 2026, the political decision to sustain carbon assets is underscored by the fact that fossil fuel subsidies in Argentina are 41.5 times higher than the entire federal budget allocated to renewables and efficiency. This institutional degradation freezes climate diplomacy and creates long-term path dependencies that crowd out clean grid infrastructure investments.

Similarly, Colombia could find itself mirroring Argentina in the short term following the change of government, and the elections in Brazil also pose a risk in terms of a possible new shift to the right. These processes highlight that, at least in recent times, regional progressivism, even with its nuances, has felt more compelled to recognize that the transition is an imperative and that the active role of the state can promote a fairer and more equitable process than one completely left to the market.

To understand the meaning and implications of the energy transition in the four countries analyzed, we evaluated their main national energy policy documents, as well as those submitted to the UNFCCC (NDCs and BTRs) and their submissions as negotiating groups -AILAC and Grupo SUR-. We also sought to understand the extent to which the energy transition incorporates the dimensions of vulnerability and adaptation, as well as each country's interpretations of the energy-security nexus. This analysis was complemented by an inquiry into the role of the relevant stakeholders in each country. To this end, a significant number of stakeholders were identified, categorized by actor type, and evaluated based on five criteria: institutional presence, commitment to and alignment with the Paris Agreement and its long-term goals, strategic influence on the transition, integration of the adaptation dimension, and the energy-security nexus. As a result of prioritization by country, stakeholders were categorized as allies, retarder/slowdowns, and vulnerable partners. This classification is not rigid and certainly allows for multiple caveats. Its purpose is to identify key partners to promote a just energy transition in the country, while acknowledging the nuances. This means that the main focus of political action ultimately lies with allies and vulnerable partners in the short and medium term.

A recurring debate in Brazil, Colombia, and Mexico concerns the role of presidents who have both favored the energy transition and a continued reliance on fossil fuels, which some explain as a means of financing the transition. This has led to the decision to categorize them as allies, even while acknowledging this nuance.



National ministries often experience internal disputes, especially between environment and energy, which only serve to reinforce tensions between economic models and conceptions of the transition. In this process, energy ministries often prevail over environmental and climate rationality in alliance with finance ministries. National, regional, and international banks often favor resolving the conflict in favor of fossil fuels, since, beyond the discourse of sustainability, financial flows continue to fund fossil fuels and its subsidies. This has been further exacerbated in cases such as the World Bank and the International Monetary Fund due to the regressive environmental and climate policies of major donors, particularly the United States.

Subnational actors (provinces, states, and municipalities) are key drivers of both progress and resistance. The situation of these actors is highly heterogeneous, depending on two key factors: whether they are territories with hydrocarbon reserves or renewable energy projects; and their form of political organization—federal or unitary—which grants them greater or lesser autonomy from the central government. For instance, Jujuy serves as a critical ally due to its solar and lithium export potential, yet its operations have triggered deep human rights and environmental conflicts over water and indigenous sovereignty, revealing severe "green extractivism" injustices. In turn, in the face of climate change-denying governments like that of Argentina, some provinces and cities serve as the anchor for climate ambition.



The volatility of interests and alignments is also evident in the private sector, largely guided by its investment and opportunity interests, accompanied by the main energy and hydrocarbon chambers, sponsored think tanks, and the emblematic national companies that spearhead the sovereignist discourse associated with fossil fuels -YPF, Petrobras, Ecopetrol y Pemex-. A discourse exacerbated in the current geopolitical context and the need to cope with the fluctuations in oil supply and price. Consequently, these coalitions finally frame energy security mainly around immediate supply stability and resource-rent maximization.

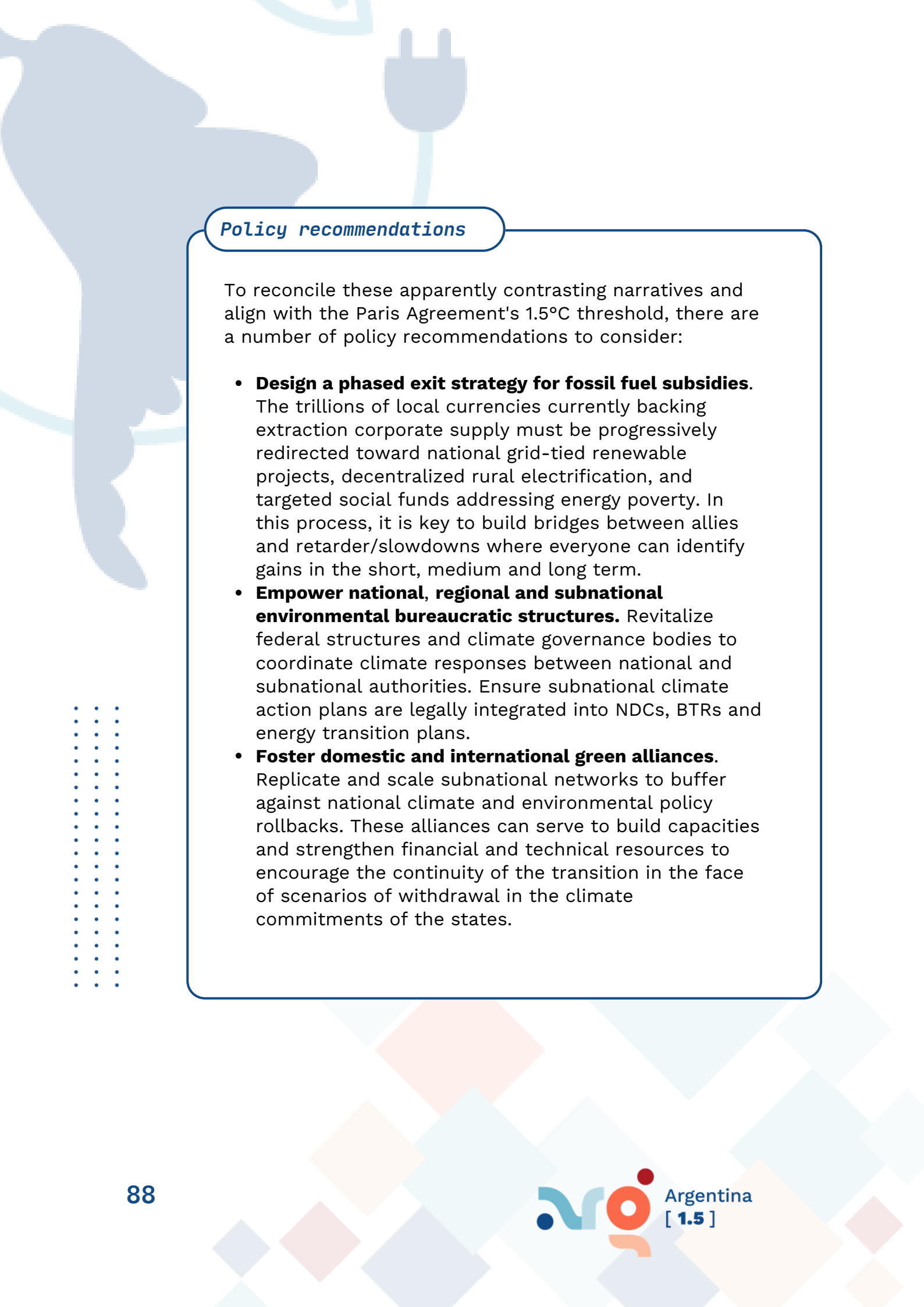
Unions, which often have climate-active units or groups, are frequently categorized as vulnerable because their workers are negatively impacted by a transition process that, to be fair, should focus particularly on creating new jobs and preparing labour forces.



Civil society organizations and think tanks have become a tireless and essential force in the struggle, building evidence with sectors of Latin American academia to demonstrate not only the benefits of the transition, but also the opportunities associated with more inclusive processes based on community resilience. A just energy transition cannot be restricted to mitigation or emission reduction metrics. Vulnerability, water management, and adaptation dimensions are intrinsically linked to socioeconomic stability. Structural challenges like prolonged droughts directly affect hydropower-dependent grids, while water scarcity creates territorial conflicts in fragile mining regions (e.g., lithium extraction in the Salar del Hombre Muerto). Progressive narratives of different stakeholders, having civil society at the center, are framing the transition around food security, climate justice, economic well-being, democracy stability, human security and water sovereignty as safeguards against social conflict and local geopolitical risks.

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Policy recommendations

To reconcile these apparently contrasting narratives and align with the Paris Agreement's 1.5°C threshold, there are a number of policy recommendations to consider:

- **Design a phased exit strategy for fossil fuel subsidies.** The trillions of local currencies currently backing extraction corporate supply must be progressively redirected toward national grid-tied renewable projects, decentralized rural electrification, and targeted social funds addressing energy poverty. In this process, it is key to build bridges between allies and retarder/slowdowns where everyone can identify gains in the short, medium and long term.
- **Empower national, regional and subnational environmental bureaucratic structures.** Revitalize federal structures and climate governance bodies to coordinate climate responses between national and subnational authorities. Ensure subnational climate action plans are legally integrated into NDCs, BTRs and energy transition plans.
- **Foster domestic and international green alliances.** Replicate and scale subnational networks to buffer against national climate and environmental policy rollbacks. These alliances can serve to build capacities and strengthen financial and technical resources to encourage the continuity of the transition in the face of scenarios of withdrawal in the climate commitments of the states.

- **Explore and encourage the use of new financial instruments and channels to accelerate the JET.**

Subnational governments should utilize international bilateral lines of credit and direct multilateral funding to bypass national-level institutional stagnation. Regional banks play a key role in financing just energy transitions and stop promoting false solutions such as gas as a transition fuel.

- **Nationally-tailored and democratic Country Platforms.**

Strengthen democratic governance mechanisms in which critical allies can participate in the design and implementation of Country Platforms -including subnational actors, academia, think and action tanks, NGOs-, understood as a non-exclusive but relevant tool to strengthen access to climate finance for the just energy transition. These tools should not be used as a mechanism to condition international financing for developing countries.

- **Incorporate Escazú Agreement standards.** Mandate prior, free, and informed consent for all critical mineral extraction projects (lithium, copper) and utility-scale solar and wind farms. This is vital to prevent water-rights violations and land conflicts with indigenous communities.

- **Preserve ecological safeguards.** Build national and regional alliances to oppose legislative reforms that seek to weaken key environmental laws to clear the path for mining and oil expansion. To deepen the litigation strategy when other resources have failed, recognizing that it has become an increasingly relevant resource to prevent the dismantling of environmental protection in territories.

- 
- **Align regional negotiating blocs.** Grupo SUR and AILAC negotiators should formulate a united front in the UNFCCC's UAE Just Transition Work Programme, demanding that just adaptation and international finance reparations be explicitly coupled with mitigation mandates. Critical allies play a key role in supporting the efforts of the groups from position building to communication processes during COPs.
 - **Standardize just transition reporting in BTRs.** Integrate qualitative and quantitative indicators on labor transitions, gender equality, energy access, and socio-environmental impacts in BTR2, as well as in the reform of the Modalities, Procedures and Guidelines of BTRs to be delivered in 2028 as a message of GST2. This will shift the narrative from simple emission counting to comprehensive socio-economic equity.
 - **Promote the integration of energy considerations in NAPs.** Mainstreaming adaptation-energy nexus in all phases of NAPs and in all the stages of energy projects is imperative, from risk, vulnerability, and impact assessments to action prioritization and progress monitoring.



Glossary of acronyms

AAPRESID - Asociación Argentina de Productores en Siembra Directa (Argentine No-Till Farmers Association)

ABU - Argentina, Brazil, and Uruguay Negotiating Group

AILAC - Independent Association of Latin America and the Caribbean

ARS - Argentine peso

BTR / BTR1 - Biennial Transparency Report / First Biennial Transparency Report

CADER - Cámara Argentina de Energías Renovables (Argentine Chamber of Renewable Energies)

CAEM - Cámara Argentina de Empresarios Mineros (Argentine Chamber of Mining Companies)

CARBIO - Cámara Argentina de Biocombustibles (Argentine Biofuels Chamber)

CBD - Convention on Biological Diversity

CELS - Centro de Estudios Legales y Sociales (Center for Legal and Social Studies)

CFEE - Consejo Federal de la Energía Eléctrica (Federal Electricity Council)

CFI - Consejo Federal de Inversiones (Federal Investment Council)

CMA - Conference of the Parties serving as the meeting of the Parties to the Paris Agreement

COFEMA - Consejo Federal de Medio Ambiente (Federal Environmental Council)

COP / COP16 / COP29 / COP30 - Conference of the Parties (under the UNFCCC) / 16th, 29th, and 30th sessions

CP - Country Platforms (Plataformas País)

EIT - Energy Transition Index

FARN - Fundación Ambiente y Recursos Naturales (Environment and Natural Resources Foundation)

FODER - Fondo para el Desarrollo de Energías Renovables (Fund for the Development of Renewable Energies)

FODIS - Fondo para la Generación Distribuida de Energías Renovables (Fund for the Distributed Generation of Renewable Energies)

GDP - Gross Domestic Product

GHG / GEI - Greenhouse Gas / Gases de Efecto Invernadero

GST / GST1 / GST2 - Global Stocktake / First and Second Global Stocktake

IAE - Instituto Argentino de la Energía "General Mosconi" (Argentine Energy Institute)

IBT - Informe Bienal de Transparencia (Spanish for BTR)

INGEI - Inventario Nacional de Gases de Efecto Invernadero (National GHG Inventory)

J.E.M.S.E. - Jujuy Energía y Minería Sociedad del Estado

JET / TEJ - Just Energy Transition / Transición Energética Justa

JETP - Just Energy Transition Partnership

LAC - Latin America and the Caribbean

LNG / GNL - Liquefied Natural Gas / Gas Natural Licuado

LULUCF - Land Use, Land-Use Change, and Forestry

MXN - Mexican peso

NDC - Nationally Determined Contribution

NGO / ONG - Non-Governmental Organization / Organización No Gubernamental

OPSur - Observatorio Petrolero Sur (Southern Petroleum Observatory)

PERMER - Proyecto de Energías Renovables en Mercados Rurales (Renewable Energy in Rural Markets Project)

RIGI - Régimen de Incentivo para Grandes Inversiones (Incentive Scheme for Large Investments)

SB62 / SB64 - Subsidiary Bodies of the UNFCCC (62nd and 64th sessions)

SSF - Sustentabilidad sin Fronteras (Sustainability without Borders)

UAE - United Arab Emirates (UAE Just Transition Work Programme)

UNFCCC - United Nations Framework Convention on Climate Change

WEF - World Economic Forum

YPF - Yacimientos Petrolíferos Fiscales

Methodological annex

1. Stakeholders mapping and assessment

Key stakeholder mapping is a type of sociogram used to identify actors associated with a specific territory and time, seeking to understand their actions and objectives. Actors are not conceived in isolation, but rather within social networks composed of social relationships and institutions. Actors in these networks occupy positions or roles according to their values, beliefs, and behaviors, which also constitute a power structure.

For the purposes of this report, a social actor is understood to be any person, group, or organization that intervenes in a situation with greater or lesser influence on a given outcome, which is linked to their access to information, resources, and experience, among other aspects.

This methodology identifies social actors in 4 countries of interest located in Latin America: Argentina, Brazil, Colombia and Mexico. Given the team's previous research effort identifying stakeholders linked to the energy transition in Brazil in 2024 and 2025, a similar approach is applied in order to achieve comparability. At the same time, the analysis was refined in order to implement the specific objectives of the project:

- A. Map the stakeholders associated with the energy transition in each country. This means identifying those involved in the development and implementation of the respective national policy, as well as in representing the country's energy positions in relevant forums such as the UNFCCC.
- B. Categorize the stakeholders based on their commitment to the objectives of the energy transition and their influence on national policy and/or external positioning.
- C. Analyze the energy policy priorities, transition stances, and security linkages found in the actors' narratives.
- D. Evaluate the dimensions of vulnerability and adaptation involved in their positions and priorities.

This determines a set of indicators for analysis:

- 1. Number and type of stakeholders involved in the development and implementation of the national and international energy policy;
- 2. Level of commitment to the objective of the energy transition and linkage with Paris Agreements objectives;
- 3. Level of influence in national and/or international energy policy;
- 4. Linkage between energy transition and international peace, economic stability, or geopolitical risk mitigation (security, stability, peace, sovereignty);
- 5. Level of adaptation mainstreaming in energy policies and priorities;

A multi-criteria evaluation analysis matrix is developed, as a tool to assess qualitative narratives and identify which stakeholders could operate as critical allies, influential retarder/slowdowns, or vulnerable partners.

Multi-criteria evaluation matrix: Energy Transition & Diplomacy

Criterion	Key Indicators
Institutional presence	Number & Type: Based on mapping in national policy and UNFCCC representation.
Commitment & Alignment	1.5°C/Paris Linkage: Explicit support for fossil fuel phase-out, NDCs, and Net Zero targets.
Strategic Influence	Policy Weight: Institutional authority to shape domestic laws or international climate positioning.
Security & Stability	Narrative Linkage: Framing energy as a tool for peace, economic stability, or sovereignty.
Adaptation Integration	Mainstreaming: Integration of adaptation dimension in energy policies.

Scoring guide for the matrix:

1. Institutional Presence (Number & Type)

- 1 (Low): Isolated local actor; no involvement in national policy or international forums.
- 3 (Medium): Involved in national implementation (e.g., local or provincial government) with occasional national presence.
- 5 (High): Key developer of national policy; frequent representative at UNFCCC.

Main sources of institutional presence:

- At the UNFCCC NGOs: observer status, submissions, participation in recent COPs and SBs (social media, web page).
- At the UNFCCC private: participation in recent COPs and SBs, participation in side events (social media, web page, press release).
- At the UNFCCC governmental actors: participation in recent COPs and SBs, part of national delegation (negotiates or not), participation in side events.
- In national policy for all: participation in the development of national energy policy documents (institutionalized or ad hoc governance will determine)



2. Level of Commitment (Paris Agreement Linkage)

- 1 (Low): Narrative supports fossil fuel expansion without transition dates; ignores Paris Agreement goals.
- 3 (Medium): Supports transition fuels (natural gas) or gradual downsizing but lacks clear 1.5°C alignment.
- 5 (High): High commitment to green hydrogen, bioenergy, or renewables; explicit support for 1.5°C-aligned mitigation.

Main sources of institutional presence:

-At the UNFCCC NGOs: narrative and proposals in submissions, documents elaborated by the NGO including JET in a UNFCCC context (1.5, Paris Agreement, etc), social media and press releases related to JET and UNFCCC process. Use of the Paris Agreement as a legal basis for domestic claims against the State for inaction.

-At the UNFCCC private: Formal adherence to science-based targets initiatives to achieve Net Zero (Race to Zero). Voluntary or mandatory disclosure of climate-related financial risks according to international standards.

-At the UNFCCC governmental actors: use the database to determine commitment based on NDC pledges and BTR implementation, alignment between national policy and NDC pledge, and details on JET.

-In national policy for NGOs: accountability reports, social media and press releases related to JET.

-In national policy for governmental: Ratio of national budget allocated to energy transition vs. fossil fuel subsidies (Indice Finanzas Sostenibles GFLAC). NDC alignment with national policy. National policy demonstrates commitment to JET (our database).

-In national policy for private: Information on investment in renewable energy and carbon assets. Voluntary or mandatory disclosure of climate-related financial risks according to international standards.

3. Level of Influence

- 1 (Low): Consultative role; no veto power or legislative influence.
- 3 (Medium): Technical advisor or influential NGO that shapes public opinion.
- 5 (High): Decision-maker (ministry, agency) or stakeholder with direct impact on national energy policy, matrix and/or external positioning.

Main sources to assess the level of influence:

-At the UNFCCC NGOs: part of ENGO, collective and individual submissions, press releases and press conferences at COP and SBs, integrated in national delegation as advisor or negotiator, integrated in negotiation group as advisor or negotiator, organization of side events in COP and SB with the participation of key national or international representatives.



-At the UNFCCC private: part of BINGO. Investment announcements in COP or SBs. Sponsor of pavilions. Press releases in COP and SBs.

-At the UNFCCC governmental actors: role in national delegation at COP and SB (HoD, negotiator, advisor...), actor's participation in key interventions (speaker, drafting role in interventions or providing inputs...)

-In national policy for NGOs: Implementation agreements where the country delegates the execution of a program to the NGO. Court rulings: Judgments in favor of the NGO in climate litigation (e.g., Supreme Court). Their reports are cited as an official source in the NDC or energy laws. Press Impact: Editorials or columns in leading national newspapers, and campaigns in social media.

-In national policy for the government: Decrees and laws signed by the actor. Allocation of specific funds for energy infrastructure under their control. Technical author or coordinator of key national energy reports or energy related.

-In national policy for private: Documents awarding wind farms, solar farms, etc. Records of meetings with the executive. Sustainability reports.

4. Security, Stability, and Peace Linkage

- 1 (Low): Energy viewed purely as a commodity; no mention of geopolitical risk or peace.
- 3 (Medium): Links energy to national sovereignty or economic stability but lacks a peace/cooperation focus.
- 5 (High): Explicitly frames energy transition as a driver for international peace, geopolitical risk mitigation, and climate justice.

Main sources to assess linkages:

-At the UNFCCC NGOs: collective and individual submissions, social media and press releases, documents elaborated by the NGO including JET in a UNFCCC context (1.5, Paris Agreement).

-At the UNFCCC private: Documents submitted in the context of international pledges such as Race to Zero. Voluntary or mandatory disclosure of climate-related financial risks according to international standards.

-At the UNFCCC governmental actors: use database (NDC, BTR, submissions and statements)

-In national policy for NGOs: reports, social media and press releases related to JET.

-In national policy for the government: use database (national instruments)

-In national policy for private: press releases and voluntary or mandatory disclosures of climate-related financial risks according to international standards.

5. Adaptation Mainstreaming

- 1 (Low): Energy policy focused solely on mitigation/generation; ignores climate risks to infrastructure.
- 3 (Medium): Some references to adaptation but not fully linked to energy policies.
- 5 (High): Full integration of adaptation into energy priorities; uses NAPs and BTRs as core steering tools.

Main sources to assess adaptation mainstreaming:

- At the UNFCCC NGOs: reports related to the UNFCCC process, submissions, press releases and social media, press conferences.
- At the UNFCCC private: Adherence to Raze to Resilience and documents submitted. Voluntary or mandatory disclosure of climate-related financial risks according to international standards with any linkage to resilience, adaptation.
- At the UNFCCC governmental actors: use database (BTRs, NDC, if possible NAP)
- In national policy for NGOs: reports, social media and press releases including adaptation and/or vulnerability dimensions of JET.
- In national policy for the government: use database (national policy instruments, NAP)
- In national policy for private: press releases. Voluntary or mandatory disclosure of climate-related financial risks according to international standards with any linkage to resilience, adaptation.

Stakeholder categories:

- Critical allies: Those with the highest scores across -at least- the first 3 criteria.
- Influential retarder/slowdowns: Those with high influence and institutional presence, but low commitment, weak linkage between security and energy agendas, and limited mainstreaming of adaptation.
- Vulnerable partners: Those with medium or low influence, institutional presence, as well as commitment, and may or may not generate a connection with security, and may or may not have a linkage between security and energy agendas, and mainstreaming of adaptation.

2.2. Methodology for developing the database



The database is built upon the identification and systematization of key current documents related to the national energy policies of the four project countries. It also includes the identification and systematization of the latest Nationally Determined Contributions (NDCs) (4) and the first Biennial Transparency Reports (BTR1) of the four countries (4), national energy policy plans by country (4); 2025 and 2026 submissions from AILAC and SUR on related topics (MWP related to energy and JTWP), and 2024-2025 statements from both groups over the last two years in COPs that may contain relevant sections related to the energy transition and the Just Transition.

The following categories are assessed through questions including in a table for reference:

NDC/BTR

- What is the country's mitigation pledge?
- Does the country have a pledge and/or measures for the energy sector?
- Does the document include references to the JET?
- Is there any reference to the vulnerability and adaptation of energy systems?

National Energy Policy Documents

- Is there alignment between the national energy action commitment and the pledge of the latest NDC?
- Does the country have a commitment to phasing out fossil fuels?
- If there is a commitment to phasing out fossil fuels, is it possible to identify any associated narrative (e.g., energy security, sovereignty, sustainability, etc.)?
- Does it include references to the JET?
- Is there any reference to the vulnerability and adaptation of energy systems?

Submissions, Statements

- Has the group shown a common position regarding the phase out of fossil fuels, identifiable in the documents?
- Is it possible to identify any narrative associated with this in these documents (e.g., energy security, sovereignty, sustainability, etc.)?
- Is there any reference to the vulnerability and adaptation of energy systems?

This information will be included in a table for each country.



NDCs/BTR by country (Arg - Brasil - Colombia - Mexico)

Guiding Questions	Clarifications	To complete the sheet
1. What is the country's mitigation pledge?	Based on the ICTU	Provide no more than 200 words as justification of each answer. Include pages of key documents (main page of the pdf file).
2. Does the country have a pledge and/or measures for the energy sector?	Provide, when possible, quantitative and qualitative information, including mitigation, adaptation components and co-benefits)	
3. Does the document include references to the JET?	If there is any inclusion, inform and detail to which sector is connected: energy transition, socio-economic transition, job transition, adaptation, etc.	
4. Is there any reference to the vulnerability and adaptation of energy systems?	If there is, inform the main focus of the adaptation (infrastructure changes to prevent strong weather - resilience-; demand side adaptation - energy efficiency-; generation and distribution - diversification-).	

National Energy Policy Documents (by country)

Guiding Questions	Clarifications	To complete the sheet
1. Is there alignment between the national energy action commitment and the pledge of the latest NDC?	Yes/No To what extent the national commitment allows the international pledge to be achieved.	Provide no more than 200 words as justification of each answer. Include pages of key documents (main page of the pdf file).
2. Does the country have a commitment to phasing out fossil fuels?	Yes/No Provide: target; timeline; differentiation by fuel type, legal instruments, financial indicators such as subsidies, carbon pricing, carbon markets. Narrative	
3. Does it include references to the JET?	Inform and detail to which sector is connected: energy transition, socio-economic transition, job transition, etc.	
4. Is there any reference to the vulnerability and adaptation of energy systems?	Inform the main focus of the adaptation (infrastructure changes to prevent strong weather -resilience-; demand side adaptation -energy efficiency-; generation and distribution - diversification-). Identify areas, regions or cities prioritized.	



Submissions, Statements (AILAC - Grupo Sur)

Guiding Questions	Clarifications	To complete the sheet
1. Has the group shown a common position regarding the phase out of fossil fuels, identifiable in the documents?	Yes/No Period/Year	Provide no more than 200 words as justification of each answer. Include pages of key documents (main page of the pdf file).
2. (related question 1) Is it possible to identify any narrative associated with this in these documents (e.g., energy security, sovereignty, sustainability, etc.)?	Identify if the narrative linked to: - TAFF related to energy security; - TAFF related to sovereignty; - TAFF related to sustainability	
3. Is there any reference to the vulnerability and adaptation of energy systems?	Identify the main focus of the adaptation (infrastructure changes to prevent strong weather -resilience-; demand side adaptation -energy efficiency-; generation and distribution - diversification-). Identify areas, regions or cities prioritized.	



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