Bridging the Gap: Unlocking Subnational Climate Action in the MENA Region

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Introduction

The first Global Stocktake (GST) revealed that the world is not on track to limit global warming to 1.5°C, nor are we adequately prepared to adapt to the impacts of climate change. While national governments are central to policymaking, subnational actors like states, regions, and cities have become critical for designing and implementing effective climate strategies as they are on the frontline of climate impacts. The MENA region is not immune to this reality. It is highly vulnerable to climate change while contributing significantly to global greenhouse gas emissions due to energy-intensive economies and fossil fuel dependence, subnational actors are crucial for translating national climate goals into concrete local action. Although the Nationally Determined Contributions (NDCs) of countries such as Tunisia[1], Morocco[2], Jordan[3], Egypt[4], and the UAE's[5] *new NDC 3.0* increasingly recognize the role of subnational actors particularly cities/municipalities in designing and implementing local climate policies, these local bodies still facing significant barriers, including insufficient budgets, weak technical capacities, and regulatory hurdles, which limit their ability to meet ambitious climate targets.

Local Climate Action Plans: Progress Made, Challenges Remain

By using innovative and participatory tools such as Local Climate Action Plans (LCAPs), MENA subnational actors are increasingly taking proactive steps to address climate change through energy efficiency measures, the deployment of renewable energy, the promotion of sustainable transport, and the enhancement of urban resilience. Local Climate Action Plans (LCAPs) serve as a valuable first step, providing a structured framework to translate national climate commitments into concrete local mitigation actions. These plans provide municipalities with a structured approach to mitigation and adaptation measures, integrating renewable energy, energy efficiency, and climate-resilient urban planning, thereby aligning local actions with national climate objectives.

Local Climate Action Plans (LCAPs) in the MENA region are often known by different names depending on their focus, scope, or the approach of supporting donors and programs. For example, initiatives may be branded as sustainable energy action plan6, Municipal Climate Action Plans, Local Mitigation and Adaptation Strategies, Urban Resilience Plans, or Green City Action Plans, depending on whether the emphasis is on mitigation, adaptation, or integrated urban sustainability. While the names vary, their core purpose remains similar: to provide subnational actors with a structured framework to plan, prioritize, and implement climate actions, often aligned with national NDCs and supported by international donors or technical partners. For example: As part of its activities, Clima-Med[7] has supported the development of 69 Sustainable Energy Access and Climate Action Plans (SEACAPs)8, covering 97 local authorities across six MENA countries: Egypt, Jordan, Morocco, Tunisia, Lebanon and Palestine.

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[1] https://unfccc.int/sites/default/files/NDC/2022-08/CDN%20-%20Updated%20-english%20version.pdf
[2] https://unfccc.int/sites/default/files/NDC/2022-06/Moroccan%20updated%20NDC%202021%20_Fr.pdf
[3] https://unfccc.int/sites/default/files/NDC/2022-06/UPDATED%20SUBMISSION%20OF%20JORDANS.pdf
[4] https://unfccc.int/sites/default/files/NDC/2023-06/Egypts%20Updated%20First%20Nationally%20Determined%20Contribution%202030%20%28Second%20Update%29.pdf
[5] https://unfccc.int/sites/default/files/2024-11/UAE-NDC3.0.pdf
[6] https://www.climamed.eu/project-documents/ces-med-seaps/
[7] https://www.climamed.eu/project/what-is-clima-med/
[8] https://www.climamed.eu/project-documents/seacaps/

After analyzing several local climate plans across the MENA region, it can be affirmed that, in terms of planning, the subnational level—particularly large regions and municipalities—has reached a notable level of maturity and demonstrates strong alignment with national climate strategies. Many municipalities now develop structured plans that integrate mitigation measures such as renewable energy deployment, energy efficiency, sustainable transport, and waste management, while also considering adaptation priorities where feasible. Initiatives like Clima-Med and other donor-supported programs have played a key role in strengthening technical capacities and providing frameworks for local action. However, despite this planning maturity, significant challenges still hinder the implementation.

Challenges in Subnational Climate Action in the MENA countries

Despite their critical role, subnational governments face a myriad of challenges in implementing climate change strategies. These hurdles often impede their capacity to act effectively and can undermine the overall coherence of national climate efforts.

Limited Governance powers and institutional barriers often impede swift and decisive climate action. Formal administrative structures, bureaucratic hurdles, and complex approval processes can slow down the implementation of climate policies. Ambiguity in the division of responsibilities between national and subnational governments can also create confusion and hinder effective multi-level governance. In addition, in many MENA countries, local and regional governments have restricted authority over key policy areas critical to climate action. Even when sectoral strategies are designed with a bottom-up approach, they are typically tailored at the national level, and their implementation is carried out by national ministries and their deconcentrated administrative units rather than by local or subnational authorities. This centralization of decision-making and execution limits the ability of municipalities and regional governments to develop and implement context-specific climate strategies, adapt interventions to local needs, or mobilize local resources effectively, creating a gap between planning and tangible local action.

For example, in the case of large-scale renewable energy projects, all major decisions—including project planning, site selection, financing, and technical specifications—are determined at the national level. Subnational authorities, such as municipalities or regional governments, often play a limited role, primarily restricted to issuing necessary permits or providing administrative support. As a result, the potential for subnational authorities to tailor renewable energy interventions to local needs, maximize co-benefits, or actively contribute to the national mitigation agenda is severely constrained, illustrating the broader limitations of decentralized climate action in the region.

Limited financial resources: Subnational governments, particularly municipalities in MENA countries frequently operate with constrained budgets, often have limited fiscal powers, heavily rely on grants and national government funding and have limited capacity to self-generate revenues. This financial dependency often extends to reliance on national transfers, which is insufficient, inconsistent, or tied to specific, sometimes inflexible, mandates. The lack of adequate and predictable funding hampers their ability to invest in necessary infrastructure, technology, and human capital for climate action.

In addition, in many MENA countries, subnational authorities are not allowed to directly engage with private banks, international donors or access climate finance mechanisms without approval from central government authorities. This restriction limits their ability to mobilize resources for local climate initiatives, develop innovative projects tailored to local needs, or respond quickly to emerging climate risks.

To overcome these financial Barriers, municipalities in many countries are attempting to engage with international project proposal calls and access **funds specifically dedicated to cities**. (*for example: municipalities of Nabeul and Sfax from Tunisia, Great Irbid Municipality in Jordan, have mobilized finance from The C4C programme*[9] *which aims to contribute to sustainable human development by promoting a transition towards greener and climate-resilient cities)*. **However, these opportunities remain limited in scope, budget and are often accessible only to a small number of highly skilled municipalities, leaving many local governments unable to benefit fully from available climate finance.**

Lack of technical capacities: Many subnational entities may not possess the specialized expertise, skilled personnel, or advanced infrastructure required to design, implement, and monitor complex climate change projects. This can manifest as a shortage of urban planners with climate expertise, or engineers capable of developing resilient infrastructure[10].

Data collection and availability at the local level: Designing any local climate change strategy requires, as a first step, the development of a local greenhouse gas (GHG) emissions inventory for mitigation strategies and a climate risk assessment for adaptation measures. Both of these steps demand large volumes of detailed data from multiple local sectors—such as energy, transport, and waste—that are often outside the direct supervision of municipalities. Collecting, verifying, and integrating this information requires extensive coordination among various local and central stakeholders/ sectors. Moreover, in many cases, data is missing or unavailable, or because of sectoral silos, it is not communicated across departments and remains confined within a single sector. This high demand for technical capacity, combined with fragmented or incomplete data, often constitutes a major barrier for local authorities in the MENA region when developing robust and actionable climate strategies.

Same problem is encountered in the implementation phase and presents significant obstacles to assessing progress and ensuring accountability. Without reliable data, it is hard to identify successful strategies, learn from failures, and adapt approaches effectively[11]

Fragmentation and Lack of Coordination: Climate action at the subnational level can often be fragmented, with different cities, regions, or municipalities pursuing independent strategies without sufficient inter-jurisdictional collaboration. This fragmentation can lead to duplicated efforts, inefficient resource allocation, and missed opportunities to leverage synergistic actions that would generate greater collective impact. For example, municipal Landfill gas energy generation are economically viable when approached through inter-municipal collaboration. In Tunisia, although the local authorities code[12] theoretically encourages cooperation between municipalities, numerous administrative, technical, and even mental barriers prevent effective collaboration, thereby limiting the implementation of these high-impact climate mitigation projects.

Conclusion

The fight against climate change is a complex, multi-scalar endeavor that demands the active participation of all levels of government. The subnational level, with its unique proximity to local realities and capacity for innovation, is not merely a supporting actor but a critical driver of climate action. While challenges such as limited financial resources, technical capacity gaps, and governance complexities

[9] https://www.climamed.eu/c4c/
[10] https://www.pnnl.gov/projects/subnational-climate-action-leaders-exchange-scale
[11] https://www.sciencedirect.com/science/article/abs/pii/S2590332224004895
[12] http://www.collectiviteslocales.gov.tn/fr/code-des-collectivites-locales-2/

persist, the opportunities presented by subnational engagement—including tailored solutions, enhanced public participation, and economic development—are immense.

Unlocking the full potential of subnational climate action requires a concerted effort to overcome these challenges through strategic support, strengthening governance which should be the priority to improve the implementation of climate and energy projects at the local level. This includes enhancing vertical collaboration between national, regional, and Local/municipal authorities to clarify mandates, streamline regulatory procedures, and ensure alignment with national climate strategies, as well as fostering horizontal collaboration among municipalities to share knowledge, pool resources, and coordinate multi-jurisdictional projects. Complementing governance, capacity building through technical training, knowledge exchange, and access to specialized tools is essential for subnational actors to design, implement, and monitor complex projects. Developing a diversified local climate project portfolio—covering renewable energy, energy efficiency, sustainable transport, and waste management—can improve project readiness and attractiveness to investors. Reforming local fiscal frameworks to provide predictable revenues and financial autonomy will support long-term climate investments. Finally, facilitating public–private partnerships (PPPs) across multiple sectors can mobilize additional finance, technical expertise, and operational capacity, enabling subnational to scale up climate action effectively.