POWERING INCLUSION:
HOW POLICY CAN ADVANCE EQUITABLE ENERGY ACCESS FOR DISPLACED PERSONS

A comparative energy policy analysis of Bangladesh, Ethiopia, Kenya and Uganda.

unitar
United Nations Institute for Training and Research

GPA
GLOBAL PLATFORM FOR ACTION

ACKNOWLEDGEMENTS

This policy brief was developed by the GPA Coordination Unit to inform inclusive energy policy and planning in displacement contexts, drawing on comparative analysis and stakeholder insights from Uganda, Kenya, Ethiopia, and Bangladesh. Thanks go to partners and colleagues at UNITAR, UNHCR, GIZ, the Ministry of Energy in Kenya, Uganda, Ethiopia, IUCN, RRRC Bangladesh, Mercy Corps, ECCA Ethiopia, OPM Uganda, and for contributing to the production of this policy brief.

Author: Joelle Hangi, Inclusivity Lead, GPA Coordination Unit

GPA Coordination Unit support: Paul Quigly, Mariana Soto, Mark Gibson, Aimee Jenks, Sadiq Zafrullah

Design: Emys DUPIRE, Graphic Design Specialist, UNITAR

This policy brief was developed as part of the Transforming Humanitarian Energy Access (THEA) programme that aims to build evidence on how to increase energy access in displacement settings. THEA is funded by the UK Aid from the UK government via the Transforming Energy Access platform and is delivered in partnership with Mercy Corps, Ashden, and Global Platform for Action (GPA).

THEA Partners:

Funded By:

For more information contact: energy@unitar.org

UNITAR October 2025

TABLE OF CONTENT

01. Introduction	09
02. Methodology	14
03. Research Findings	16
04. Opportunities	30
05. Recommendations	35

ABBREVIATIONS

ADB	Asian Development Bank
CRRF	Comprehensive Refugee Response Framework
EASP	Electricity Access Scale-Up Project
EETWG	Energy and Environment Technical Working Group
EU	European Union
GIZ	German Corporation for International Cooperation
	(Deutsche Gesellschaft für Internationale Zusammenarbeit)
ICRC	International Committee of the Red Cross
IDP	Internally Displaced Person
IFC	International Finance Corporation
JRP	Joint Response Plan
KKCF	Kenya Kwanza Catalyst Fund
KOSAP	Kenya Off-Grid Solar Access Project

ABBREVIATIONS

LPG	Liquefied Petroleum Gas
NDP	National Development Plan
ReHoPE	Refugee and Host Population Empowerment
RRP	Uganda Refugee Response Plan
SAFE+	Safe Access to Fuel and Energy Plus
SDG	Sustainable Development Goal
SERP	Sustainable Energy Response Plan
STA	Settlement Transformative Agenda
UECCC	Uganda Energy Credit Capitalisation Company
VAT	Value Added Tax Company
WB	World Bank Company

EXECUTIVE SUMMARY

This policy brief examines the policy and regulatory landscape shaping energy access for displaced populations across four refugee-hosting countries: Uganda, Kenya, Ethiopia, and Bangladesh.

The brief:

- Explores the degree to which national and international energy frameworks (including SDG 7) integrate forcibly displaced persons, specifically refugees and refugee settings
- Identifies systemic barriers to policy implementation and highlights promising practices in inclusive energy planning

Drawing on stakeholder interviews and comparative policy analysis, the findings show that while several progressive policies exist, such as the Sustainable Energy Response Plan (SERP), Energy Policy for Uganda 2023, and Kenya's Turkana County Energy Plan and Shirika Plan, implementation remains inconsistent due to weak institutional coordination, fragmented funding, and limited opportunities of refugee participation.

The research reveals a persistent disconnect between high-level global commitments to universal energy access and the on-the-ground realities in refugee-hosting settings. Inclusion is often hampered by donor-dependence, legal status limitations (as in Bangladesh), or the absence of operational frameworks to translate national policy into implementation.

Research findings also show that there are clear opportunities to build resilience and equity through inclusive policy systems. National policy frameworks can embed coordinated mechanisms that can then be implemented collectively by public, private and humanitarian actors. When displaced populations are recognized in energy strategies, the result is not just improved service delivery but also enhanced social cohesion and environmental sustainability.

This policy brief calls on governments, development partners, and humanitarian actors to adopt inclusive energy policies that recognize displaced persons as integral to national energy transitions, instead of peripheral to them. The inclusion of displaced persons in these policies matters, not only for moral or rights-based reasons, but also because it unlocks access to national and international resources, builds long-term infrastructure, and ensures that refugees and host communities can benefit from the same services as citizens, paving the way for improved equity and equality. Without this inclusion, displaced persons remain dependent on fragmented and short-term humanitarian support, and they are unable to contribute to or benefit from progress towards national energy and climate resilience goals.

EXECUTIVE SUMMARY

RECOMMENDATIONS FOR AN INCLUSIVE HUMANITARIAN ENERGY POLICY

Embed displacement settings, particularly refugee communities (camp-based and urban), in national and subnational energy framework:

Governments in refugee-hosting countries should adopt inclusive policies, such as moving beyond treating displacement as a temporary emergency, and instead include displaced persons in national energy policies and development strategies. Uganda's 2023 Energy Policy update sets a benchmark, explicitly including refugees as both energy consumers and contributors to national economic growth, rather than just aid recipients.

Rather than remaining the responsibility of humanitarian actors that lack the technical expertise and appropriate funding sources to address them, refugees' energy needs should be integrated into national energy policies, plans, and financing frameworks, alongside those of host communities. Governments should develop legal provisions that recognize forcibly displaced populations' right to energy and allocate budget lines within national energy programs. This includes removing administrative barriers that exclude refugees from connecting to the grid and national energy access programmes, or that restrict energy companies from accessing refugee settings.

STRENGTHEN SUBNATIONAL ENERGY GOVERNANCE:

Sub-national governments should be empowered and equipped to implement inclusive energy policies. The inclusive energy plan of Kenya's Turkana County, developed with refugee consultation, demonstrates how local authorities can lead with support from national ministries and development partners. Similarly, the ICRC's approach of partnering with government in fragile regions to develop long-term infrastructure master plans showcase another effective model for aligning immediate humanitarian action with sustained development impact, ensuring coordinated investment that balance short-term needs with long term resilience[1].

| 1. ICRC: Partnership and Innovation in DRCongo

01.

INTRODUCTION

Introduction

As of 2024, over 123 million people were forcibly displaced due to conflicts, climate change, and socio-political instability[2]. Of them, over 66% lived in protracted displacement situations[3]. Refugees and other displaced persons hosted in low-income countries face challenges due to fragile and limited energy infrastructure. Despite the fundamental role of energy in daily life, access remains highly inadequate for displaced persons, particularly refugees. Because energy is an enabler of essential services and opportunities, displaced persons have reduced access to quality education, healthcare, economic participation, and safety[4].

Energy is a critical enabler of both short-term humanitarian responses and longer-term development for communities. However, displaced populations often remain underserved in national energy planning, which exacerbates inequalities and restricts their ability to rebuild their lives. According to the latest State of Humanitarian Report 2022, refugees in camps only have access to basic electricity, while more than 80% still rely on biomass for cooking, contributing to environmental degradation and health risks.

WHY THE BRIEFING NOTE?

This briefing note aims to:

- Call for Increased Collaboration
- Offer Steategic Policy Recommendations
- Underscore Adverse Consequences
- Enphasize Inclusive Engery Policy
- Identify Systemic Barriers
- Advocate for Integration

2. UNHCR Global
3. UNHCR Trends
4. SeforAll-2023 Annual Report

DEFINING INCLUSIVE ENERGY POLICIES

This briefing note defines "inclusion" as the intentional recognition and integration of displaced populations within the energy policies, strategies, investments and frameworks of host nations.

Credits: © Jjumba Martin, Enter Energy Ethiopia. Caption: Nahom Mengitsu technical lead, Humanitarian Energy (HumEn)

Inclusive policies are essential to ensuring that displaced individuals are not marginalised in the pursuit of a clean energy transition. Such policies are designed to address the specific needs of displaced individuals while promoting equitable energy access in conjunction with host communities.

This approach involves:

- Deliberately incorporating displaced populations into national energy policies, regulatory frameworks, and development strategies.
- Ensuring that displaced communities derive benefits from planned energy initiatives.
- Fostering collaborative strategies that engage government entities, humanitarian organizations, development agencies, and the private sector in energy planning processes concerning displaced persons.
- Removing administrative barriers that prevent displaced populations

from accessing energy services, while also advancing interlinked policies in areas like financial inclusion and digital connectivity that are essential for delivering and effective usage of energy.

- Recognizing and promoting clean energy innovations and clean energy access initiatives led by displaced persons.

THE ROLE OF POLICY IN ENABLING ENERGY ACCESS

Policy frameworks are crucial in shaping the energy landscape and facilitating investments in sustainable energy solutions. At the global level, initiatives such as the SDG 7 Global Roadmap[5], the Clean Cooking Declaration[6] the Clean Energy Challenge, and the Global Compact on Refugees[7] underscore the necessity for inclusive energy planning. Nationally, policies such as energy access strategies, electrification master plans, and clean cooking frameworks operationalize these global ambitions by translating them into concrete programs and budget allocations. Thus, international frameworks set the agenda, national policies activate it, and coordinated implementation ensures forcibly displaced communities are not left at the margins of energy transitions. Inclusion in policy, planning and program documents is essential for formalizing refugee inclusion, providing a platform for guiding stakeholders and coordination, and demonstrating political support to unlock funding.

SYSTEMIC BARRIERS TO ENERGY ACCESS FOR DISPLACED PERSONS

REGULATORY CHALLENGES:

88% of refugees in Africa live in camps/settlements. Private sector actors often face administrative barriers to enter/operate in these camps/settlements which may either fully restrict access or increase the cost of doing so. Countries may also impose territorial or political restrictions on the development permanent infrastructure for refugees. For instance, Bangladesh and Uganda have placed restrictions on the type of housing infrastructure that can be constructed in camps or informal settlements to avoid signalling the permanence of these communities.

5. SDG7 Global Roadmap
6. The Clean Cooking Declaration: Making 2024 the Pivotal Year for Clean Cooking
7. Global Refugee Compact

LEGAL AND POLITICAL RECOGNITION:

If countries do not recognise refugee or IDP status in domestic law, these populations are excluded from national/subnational policies, including for energy. As a result, they can also face difficulties in access to infrastructure such permanent housing without formal documentation and international legal recognition. For instance, Bangladesh is not a signatory to the 1951 Refugee Convention and subsequently enforce a strict encampment policy which maintains high aid reliance and no integration into the national development system.

FUNDING GAPS:

In developing countries, humanitarian energy initiatives remain chronically underfunded and excluded from national energy programs, resulting in short-term, unsustainable projects and limited opportunities for broader investment and stakeholder engagement.

LIMITED MARKET INCENTIVES FOR PRIVATE SECTOR ACTORS:

The private sector commonly perceives areas hosting refugees as high-risk, temporary environments, which constrains the development of energy business models and investment that could increase access to energy.

LIMITED CROSS-SECTOR COLLABORATION:

The lack of coordination among humanitarian, development, and governmental entities hampers effective energy planning and implementation. Given these challenges, policy reforms are essential to ensuring displaced persons are fully integrated into energy access strategies, aligning humanitarian responses with national development priorities.

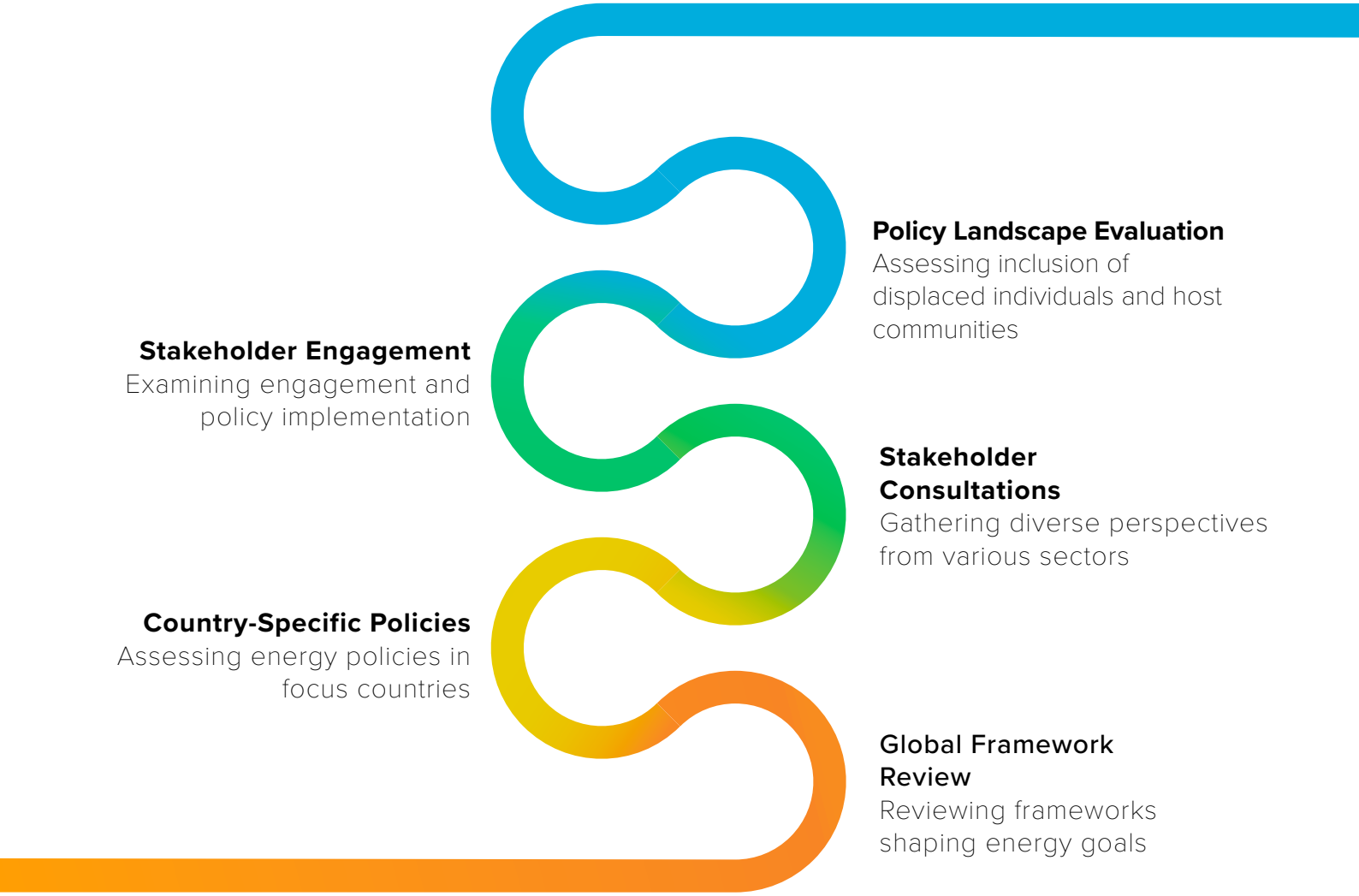
02.

METHODOLOGY

Methodology

The methodology used in this analysis combined an in-depth examination of global, regional, and country-level energy frameworks with interviews of key stakeholders in the humanitarian energy sector and national governments in the four target countries to assess the extent to which displaced people were integrated into national energy policies and strategies.

COMPREHENSIVE ANALYSIS METHODOLOGY



03.

RESEARCH FINDINGS

Credits: © Mercy Corps. **Caption:** Energy Ethiopia

Research Findings

POLICIES NEED ENGINES: DATA, FINANCE, COORDINATION AND INCLUSION

Policies are the foundation of progress, but they remain words on paper without implementation supported by data, funding, and coordination. Data is essential for identifying access gaps, developing targeted interventions, and measuring impact. Without it, national planning efforts risk overlooking displaced persons. Moreover, financing to energy access initiatives for displaced persons is most impactful when aligned with national policy goals. Such alignment is essential for scaling up infrastructure and delivery mechanisms beyond short-term humanitarian projects. Additionally, inter-agency coordination and political momentum ensure that policies move from paper to practice, uniting ministries, donors, and implementing partners around a shared framework. The strength of an energy policy lies in its ability to provide authoritative guidance that shapes programmes, funding, and partnerships, by legitimizing government actions, aligning stakeholders, and signalling long-term priorities, even if it is not legally binding.

In **Uganda**, the current energy policies in place, including the Sustainable Energy Response Plan for Refugees and Host Communities (SERP), are particularly influential because they are embedded within national development frameworks, such as National Development Plan III (NDP III), which specifically include refugees in objectives and actions. These documents not only acknowledge displaced persons but also provide a coordinated roadmap for government, humanitarian, and private sector actors to jointly deliver energy goods and services in areas hosting refugees. The influence of these policies is evident in the expansion of solar mini-grids, clean cooking initiatives, and cross-sectoral planning mechanisms in these communities. These inclusive policies and plans have supported the mobilisation of significant donor financing from the World Bank, German Corporation for International Cooperation (GIZ), and European Union (EU) to expand energy access nationally through programmes that include refugees.

In **Kenya**, national frameworks like the Energy Act (2019) create crucial pathways for refugee inclusion by empowering subnational governments to lead energy planning, even without explicitly mentioning refugees. Subnational authorities are leveraging this mandate, as demonstrated by the development of the Turkana County Energy Plan, which has been shaped by direct refugee consultation and local innovation.

County-level initiatives are fuelled by a strong political will to include refugees in planning processes. This decentralized, bottom-up approach is now influencing national policy design. Both the draft Energy Bill and the Kenya National Energy Compact reflect a commitment to reaching vulnerable and marginalized communities, a category that inherently includes refugees. These layered and mutually reinforcing governance structures ensure refugees are systematically integrated into the national energy transition.

Ethiopia's most recent influential policy documents include the Multi-Actor Cooking Energy Strategy (2022–2030) and the forthcoming refugee-inclusive national energy policy. Although not yet legally binding, these frameworks shape donor investments and signal the government's willingness to align with global commitments to support displaced people. However, their practical influence is currently constrained by limited availability of funding and technical expertise.

In **Bangladesh**, the Joint Response Plan (JRP) serves as the de facto primary policy document guiding humanitarian response, including energy interventions. It was developed by humanitarian organisations with government endorsement, but it is not an official state policy. While the JRP aligns sectoral coordination and donor investments in Cox's Bazar with government priorities, it excludes refugees from long-term national energy strategies. Crucial refugee energy and environment programmes, such as Safe Access to Fuel and Energy Plus (SAFE+) (2019-2022) and SAFE+2 (2022-2025), which have provided LPG for cooking to close to 200,000 households and rehabilitated degraded ecosystems, owe their existence to this framework. However, its effectiveness in guaranteeing long-term energy access is limited by its focus on short-term, humanitarian assistance. Additionally, it lacks enforcement power and is separate from the country's national energy strategy.

POLICY AND REGULATORY ENVIRONMENT

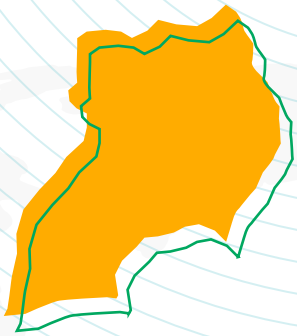
Closing the Gap in Inclusive Energy Policy Among International and National Actors

This study reveals a lack of a clear global and national policy commitment to meaningful energy inclusion. What is available are fragmented policies, some of which are symbolic in nature, and in some settings, like Bangladesh, with no inclusive policies at all. Even where there is some progress on inclusivity, a significant disconnect persists between high-level frameworks and local-level implementation. In many contexts, policies referencing universal energy access or vulnerable populations fail to explicitly include displaced and refugee persons or provide operational mechanisms for implementation. For example, while Ethiopia has signed onto global compacts and pledged reforms, key actors report that national energy policies are outdated, fragmented, and their translation into energy plans and their delivery are underfunded. Critically, these policies do not provide clear operational pathways or budgetary provisions to extend access to displaced communities. As a result, refugee settlements/camps continue to rely on parallel humanitarian energy interventions, disconnected from national energy access efforts, illustrating how policy gaps at the national level translate into exclusion on the ground.

In Bangladesh, the lack of legal recognition for refugees has limited their integration into national systems, with energy initiatives for displaced communities relying on project-based humanitarian delivery rather than inclusion in national energy policy and programs. Even in Uganda, widely seen as advanced in inclusion, stakeholders noted that *"no robust tracking system exists to monitor energy outcomes for refugees"* which undermines accountability, and that there has been no budget to implement the SERP. This misalignment results in program inefficiencies, and a failure to scale innovations beyond the feasibility study phase largely due to poorly planned projects, constrained project timelines and budget cycles, and humanitarian organisations piloting projects which do not align with national programs and development approaches. Bridging this gap requires strengthening and decentralizing implementation capacity at the local levels, investing in inclusive monitoring systems, and ensuring displaced communities have a voice in decision-making processes. In Kenya, for instance, despite the devolution of ministerial authority to the county level which has had positive impacts, a lack of a commensurate transfer of funding or technical expertise for energy policy design and implementation has markedly constrained refugees' access to modern energy services.

Table 1: Cross-Country Comparison

UGANDA



Policy Overview

Uganda demonstrates a strong policy commitment to refugee inclusion in several national and sectoral energy initiatives. The Energy Policy for Uganda (2022 & 2023) is particularly notable for explicitly integrating refugee-specific energy provisions. This policy outlines national priorities for universal access and renewable energy, signalling a deliberate effort to include displaced populations in the country's energy transition. The SERP was developed to align with energy policies, NDP and the Uganda Refugee Response Plan (RRP). These policies directly target energy access improvements for refugees and host communities, emphasizing protection, sustainability, and resilience. Similarly, the Refugee and Host Population Empowerment (ReHoPE) strategy and the Settlement Transformative Agenda II (STA II 2022–2027) prioritize inclusive energy interventions as a means of enhancing self-reliance and development outcomes in displacement settings.

Further reinforcing these efforts is Uganda's adoption of the Comprehensive Refugee Response Framework (CRRF), which promotes the integration of refugees into national services, including energy infrastructure. The National Development Plan III (NDPIII) also articulates intentions to strengthen refugee protection and migration management under its governance and security program.

Some of Uganda's energy frameworks, while important for national development, fall short in explicitly addressing refugee needs. The Renewable Energy Policy (2007) encourages rural and off-grid energy solutions, which may indirectly benefit refugee-hosting regions.

Similarly, the Uganda Energy Transition Plan (2023) outlines the country's path toward clean energy expansion but lacks indicative refugee or displacement context targets given their unique challenges. Although the plan's goals align with sustainable development principles, the absence of refugee-specific language or mechanisms limits its relevance to displaced populations.

Other key energy initiatives include the Electricity Access Scale-Up Project (EASP) and Uganda's 100% Renewable Energy Roadmap, which aim to boost energy access nationally, including in underserved rural areas and sets specific targets for refugee-hosting districts (RHDs) with companies receiving higher incentives for sales made in those RHDs than in other, easier to reach regions. These initiatives reflect the government's commitment to sustainable energy development and Uganda sets an exemplary policy practice in this regard.

BARRIERS

- Many policies' implementation plans and strategies remain silent on refugees' challenges due to funding gaps and implementation impracticalities.
- Energy infrastructure expansion in refugee-hosting areas and other remote areas of Uganda is under-resourced, despite policy objectives.
- No robust tracking system exists to measure energy access outcomes for refugees or their integration into the national data systems.
- Lack of dedicated budget to facilitate and coordinate planning implementation and evaluation of policy recommendations and their impacts.
- The government has allocated budgets for policy development; however, external funding and technical support are limited.

ENABLERS

- NDPIII, Sustainable Energy Response Plan (SERP), ReHoPE, STA II, and CRRF ensure policy and implementation alignment for displaced and host communities.
- WB supports MEMD and UECCC in allocating $120 million to increase energy access in Refugee Hosting Districts through the Energy Access Scale up Project.
- Government concern over environmental impact and SDG 7 goals and a need to address emerging conflict between refugees and host community over shared resources such as wood.
- Pressure from refugee inflows (Uganda hosts Africa's largest refugee population), including sudden refugee influxes (South Sudan, DRC crises), moved the country to shift from emergency response to mainstreaming refugee needs into national energy plans.

Table 1: Cross-Country Comparison

KENYA

Policy Overview

Kenya's energy sector is shaped by the National Energy Policy (2018), which aims for universal, sustainable access through renewables, and the Energy Act (2019), which consolidates energy laws and promotes mini-grids, decentralization, and private sector involvement. This has enabled the National Energy Policy 2025-2034 which captures marginalised groups, the recent Kenya Energy Compact, and the draft Energy Bill to reflect a strong, refugee-inclusive policy design.

The Feed-in Tariff (FiT) Policy supports investment in renewables, and the Kenya Off-Grid Solar Access Project (KOSAP) brings off-grid solutions to underserved areas,thereby indirectly benefiting refugee settlements. These inclusive approaches are rooted in the broader policy shift following the 2010 devolution, which recognized refugees as part of the county's population. However, the development of the country's energy policies, particularly in areas where refugees are based, has been significantly hindered by funding constraints. This situation leaves refugees behind in terms of energy access and clean energy transition. Though refugees are not explicitly prioritized, the Kenya Refugees Act (2021), CRRF framework, Shirika Plan, and county-level energy plans support broader inclusion goals.

BARRIERS

- Absence of explicit refugee inclusion in national energy policies.
- Reliance on county-level interpretation; limited alignment between energy and refugee response sectors.
- Private sector risk perception limits investment in refugee areas.
- The government has allocated budgets for policy development, however external funding and technical support for implementation are limited.

ENABLERS

- CRRF, Refugees Act 2021, KOSAP, the Energy Act (2019), the National Energy Policy 2025-2034 which captures marginalised groups, the recent Kenya Energy Compact, and the draft Energy Bill and devolved energy mandates to counties to create room for inclusive practices.
- Devolved energy mandates to counties create room for context-specific and inclusive practices.
- The adoption of inclusive governance is facilitating the creation of public-private financial mechanisms, such as the Kenya Kwanza Catalyst Fund (KKCF) in partnership with the International Finance Corporation (IFC), which are designed to channel investment toward marginalized and refugee communities.

Table 1: Cross-Country Comparison

ETHIOPIA

Policy Overview

Ethiopia currently lacks a comprehensive national policy that specifically addresses energy access for displaced populations. However, efforts are underway to draft a new policy to address this critical issue. In place of national policies, currently stakeholders rely on pledges (e.g., inclusion, climate action, private sector engagement) under the Global Refugee Compact (2018). These pledges aim to integrate refugees into national systems (e.g., right to work, access to services).

The current policy review process brings hope of a more inclusive agenda: Ethiopia's revised National Energy Policy 2018 emphasizes clean energy access for all, including displaced populations. The Growth and Transformation Plan III and the 10-Year Development Plan (2021-2030) focus on renewable energy expansion and universal electricity access. The Multi-Actor Cooking Energy Strategy for Refugees and Host Communities (2022-2030) directly targets energy inclusion.

The Melkadida Refugee Compact (2024-2027) integrates renewable energy into resilience programming.

BARRIERS

- While newer strategies are more inclusive, historical lack of refugee focus hinders implementation.
- Coordination between humanitarian and government actors is evolving but uneven; energy distribution in remote refugee areas remains weak.
- Regulatory barriers (such as licensing, taxation) hinder project scalability.
- The Environmental Protection Policy (28 years old) is under review but does not currently include displaced populations.
- The government has allocated budgets for policy development, however external funding and technical support for implementation are limited.

ENABLERS

- Government collaboration with GIZ national cooking strategy and Melkadida Compact demonstrate multi-stakeholder commitment.
- An emphasis on sustainability and energy equity is growing.

Table 1: Cross-Country Comparison

BANGLADESH

Policy Overview

Bangladesh's energy framework includes the National Energy Policy (2004), Renewable Energy Policy (2008), and the Integrated Energy and Power Master Plan (2023), which collectively emphasize expanding renewable energy and infrastructure development. While these policies do not specifically mention refugees, the Energy and Environment Technical Working Group (EETWG) guides energy efforts in Rohingya camps. The EETWG is separate from national policies and programs, and energy initiatives in Cox's Bazar are addressed through the humanitarian response mechanisms. The SAFEPlus and SAFE+2 projects provide LPG and solar energy in Cox's Bazar, supported by the Joint Response Plans (JRP). These efforts, while impactful, are driven by humanitarian actors rather than integrated national energy policy frameworks.

Projects which are perceived as permanent, such as national grid connections or more robust shelters, are not permitted by the government. Further, all aspects of these projects are completely reliant on humanitarian funding and actors, which now face serious cuts. Access to reliable, affordable energy would enable displaced populations to engage in productive activities and contribute to the wider economy. However, without the right to work and earn an income, refugees cannot afford energy services, perpetuating a cycle of dependency.

BARRIERS

- Energy policy frameworks lack explicit provisions for refugee inclusion.
- EETWG and humanitarian-led projects operate in isolation to national government policies that support host communities.
- The government stance is that refugees are considered temporary. This government approach impacts overall policy formulation and implementation, including energy access policies framewor- Reliance on donor projects limits scalability.
- The government does not allocate budgets for policy development and external funding, and technical support are undergoing significant reductions.

ENABLERS

- Despite lack of support through national policy and frameworks, humanitarian coordination platforms (EETWG) and annual JRPs have enabled energy access programs to develop using humanitarian funding and grants from ADB and WB.
- Projects like SAFEPlus have scaled up energy access in refugee camps; LPG provision and solar initiatives reduce environmental harm and improve well-being.
- Government interest in tackling environmental crises explains partly why they approved the LPG project and other environmental projects.

STAKEHOLDER INSIGHTS

The section below presents some insights from stakeholders across the humanitarian response that were interviewed for this policy brief. Representatives of UN agencies, government departments on energy, INGOs, NGOs and policy makers across the humanitarian energy response spectrum.

In **Uganda**, stakeholders, including the Ministry of Energy and NGOs like Mercy Corps, emphasize a collaborative approach to energy policy in displacement contexts. This reflects structured inclusivity, though implementation gaps persist due to bureaucratic delays and weak monitoring systems, and lack of resources and budget for the SERP implementation. "SERP was not effectively implemented due to a lack of baseline data and monitoring system", a member of the SERP steering committee emphasises.

In **Kenya**, there is subnational innovation amidst policy gaps. While Kenya's national energy policies lack explicit refugee inclusion, Turkana County has pioneered localized solutions. A development organisation advisor noted: "Refugees helped shape the Turkana Energy Plan, we ensured their needs were reflected." However, financial constraints hinder progress, with Turkana's energy team stating: "We need 3 million KES just to pass the energy bill, yet our annual sector budget is 12 billion KES across all departments."

In **Ethiopia**, aspirational policies often face implementation delays. Ethiopia's government has engaged displaced communities in policy discussions – confirmed by a Ministry official. Yet, strategies like the Multi-Actor Cooking Energy Strategy remain unimplemented due to funding shortages and macroeconomic barriers, including value added tax and import restrictions that stifle private sector participation.

Credits: © Jjumba Martin, Enter Energy Ethiopia; Caption: A technician rolls cables for a new house connection in Sheder refugee Camp, northeastern Fafan Zone in the Somali region of Ethiopia.

In **Bangladesh**, the energy policy landscape is characterized by an exclusionary policy framework. In Bangladesh, refugee energy access is constrained by their legal status as refugees, as they are referred to as *"temporarily displaced."* An NGO representative noted: *"We align through guidelines, but national policy conversations do not include us."* Projects rely on short-term humanitarian funding, with another NGO reporting: *"Funding cuts forced some refugees to sell their solar kits to buy food."* This exclusion undermines long-term energy access sustainability and SDG 7 progress.

Structural, Legal, and Operational Hurdles: Despite progress in some settings, stakeholders across all four countries emphasised persistent barriers to designing and implementing inclusive energy policies. A significant challenge is the resource-constrained environment in which both governments and humanitarian agencies operate. In Ethiopia, the Ministry of Energy acknowledged: *"High upfront costs for solar and mini-grid systems deter both public and private sector investment in refugee settings."* Similarly, in Bangladesh, multiple NGOs described funding delays, rigid approval procedures, and a lack of predictable financing, noting: *"Most refugee energy projects are approved on an ad hoc basis through Refugee Relief and Repatriation Commission (RRRC), not as part of national planning."*

Another cross-cutting issue is the limited inclusion of refugees in policy-making processes. While Uganda and Kenya have made progress, Ethiopia and Bangladesh continue to rely on intermediary representation rather than direct refugee consultation. A refugee in Ethiopia, observed: *"Solar systems are installed in NGO offices, not our homes, because our needs weren't part of the policy dialogue."*

The protracted nature of displacement further complicates energy planning. Governments are reluctant to make long-term infrastructure commitments for populations deemed temporary. As a UN Agency in Bangladesh noted, *"Refugees are denied grid connectivity to avoid signalling permanence, even though they've been here for years."* Lastly, the energy needs of host communities are often equally pressing, placing additional strain on already limited resources. This tension was highlighted by Turkana County representatives in Kenya: *"We must serve both hosts and refugees, but funding and policy don't scale equally for both."*

04.

OPPORTUNITIES

When refugees are included, everyone wins.

Despite these challenges, several examples show that inclusive energy planning yields widespread socio-economic benefits. In **Uganda**, the Ministry reported: *"Including refugees in our energy policies allowed us to attract World Bank blended finance, which benefited both refugee and host communities."* This has created new market opportunities, spurred clean energy entrepreneurship, and extended the national electrification agenda.

In **Kenya**, refugee-led initiatives demonstrate what is possible with the right policy environment. A GIZ representative noted: *"Okapi Green Energy, a refugee-owned solar mini-grid operator in Kakuma, was enabled by the Turkana County Energy Plan. This is local inclusion in action."* These models show that displaced populations can be energy providers, not just beneficiaries, if given the conducive regulatory space.

Social cohesion is also strengthened when energy access is equitable. Uganda's ReHoPE framework and Kenya's Shirika Plan have both emphasised integrated service delivery, reducing tensions between the displaced and the host communities, and building resilience. As a Ugandan government official stated, *"When refugees and hosts benefit from the same infrastructure, it promotes long-term stability."*

BRIDGING HUMANITARIAN AND DEVELOPMENT APPROACHES

Beyond short-term relief: Toward durable solutions.

One of the most consistent themes across stakeholder responses was the need to transition from parallel humanitarian delivery systems to integrated national planning. In Uganda, this shift is already underway. *"We've moved from emergency response to mainstreaming refugees into national energy plans,"* said a Ministry official. SERP (Sustainable Energy Refugee Response Plan) exemplifies this effort, aligning humanitarian interventions with development goals and budgetary cycles.

In contrast, Bangladesh remains reliant in a humanitarian model. UNHCR noted: *"All energy interventions*

are project-based, with no national budget allocation or integration into energy targets." This model lacks scalability and undermines long-term sustainability.

The solution could lie in hybrid planning mechanisms as seen in Kenya, where Turkana County aligns donor-funded mini-grid projects with national energy laws. Ethiopia is attempting to coordinate similar efforts through its Environmental Working Group and a draft inclusive policy framework, but implementation remains limited by capacity gaps and donor dependency. The implication of this is that to meet SDG7 and resilience goals, **governments must embed energy programs in displacement hosting regions into national strategies and sector plans**, supported by joint financing mechanisms and policy alignment tools.

Examples of best practices

ETHIOPIA'S MULTI-ACTOR COOKING STRATEGY A DONOR-BACKED FRAMEWORK

Ethiopia's 2022–2030 cooking energy strategy, developed with GIZ and Clean Cooking Alliance, targets displaced populations and host communities with clean fuel access goals. While well-formulated, its implementation remains hindered by weak funding and low government prioritization.

"The strategy is strong on paper, now it needs a budget."- Clean Cooking Alliance Ethiopia

UGANDA'S SERP – POLICY-DRIVEN INCLUSION

Uganda's Sustainable Energy Response Plan (SERP) is a government-led initiative that integrates refugee energy access into the national energy sector strategy. Enabled by high-level political commitment and World Bank support, SERP coordinates public institutions, donors, and private actors to deliver off-grid solar and clean cooking solutions in refugee-hosting districts.

"Refugees are now part of the national electrification agenda, not an afterthought." - Ministry of Energy, Uganda

The SERP sets a very good inclusive energy policy initiative that other countries could borrow from if they are to be meaningfully inclusive in humanitarian energy policy planning.

CATALYZING MULTI-SECTORAL COLLABORATION: SHARED OWNERSHIP FOR SHARED OUTCOMES

Collaborative governance emerged as a key enabler of inclusive policy success. In **Uganda**, a government official emphasised: *"The most effective energy projects were driven by coalitions: GIZ, World Bank, UNHCR, and government co-designed and co-implemented activities."* Mercy Corps reinforced this: *"We work through advocacy and introduce programs, but real change happens when all actors align."*

Kenya's model of devolved energy planning, supported by GIZ and refugee-owned enterprises, shows the power of public-private-humanitarian partnerships. Turkana County's stakeholder review processes and MOUs signed between the government and NGOs are helping harmonize program delivery.

In **Ethiopia**, collaboration is emerging, but gaps remain. UNHCR reported improved coordination under the Energy and Environment Working Group yet noted: *"NGOs still operate independently of central frameworks."*

Bangladesh faces the most severe fragmentation, with NGO Forum stating: *"There's no coordination platform for long-term policy, only short-term project alignment."* Institutionalized platforms for dialogue, planning, and data sharing, such as multi-stakeholder working groups and technical steering committees, are essential for durable and inclusive energy planning in displacement contexts.

STRATEGIES TO INTEGRATE DISPLACED PERSONS INTO NATIONAL ENERGY PLANNING AND IMPLEMENTATION

Develop inclusive planning tools and data systems: Governments and energy planners must adopt tools that capture and reflect the energy needs of refugees, such as **disaggregated and granular energy access data**, geospatial energy planning tools that include camps and settlements, and joint planning units (e.g. Uganda's Energy/Environment Refugee Secretariat). Without these tools and data, refugees remain invisible in access to energy targets and investment planning.

Institutionalize refugee participation in policy design: Stakeholders need to go beyond consultations and embed displaced persons and refugee-led initiatives into energy planning processes. Kenya's inclusion of refugee entrepreneurs in technical steering committees for Turkana County's policy development illustrates how displaced persons can contribute both insights and innovations.

Bridge humanitarian and development delivery systems: Strategies must prioritize the transition from humanitarian energy delivery models to sustainable, market-based, and government-led systems. This requires integrating refugee energy programs into national electrification and clean cooking plans, supported by national funding and financing frameworks. Ethiopia's draft inclusive energy policy and Uganda's SERP demonstrate the value of bridging systems, but both require long-term financing to succeed.

05.

RECOMMENDATIONS

Credits: © Ezra Millstein/Mercy Corps. **Caption:** Mercy Corps' Rural Resilience Activity (RRA) programme has been implementing irrigation systems on farms across Adamawa state to support dry season farmers, including this solar-powered system.

Recommendations

Mainstream displacement settings within national and subnational energy planning. Refugee-hosting governments should adopt inclusive policies and development strategies that frame displacement as a long-term development opportunity. This approach is critical to break the cycle of humanitarian dependency and unlock significant economic and social benefits for both host communities and displaced populations. Integrating energy needs into national systems enables governments to attract larger-scale development financing, build resilient infrastructure that serves everyone, and leverage the potential of displaced persons as contributors to the national economy. Following Uganda's example, where the 2023 Energy Policy explicitly includes refugees as economic contributors, not just aid recipients, demonstrates this transformative approach.

Advocate for legal recognition of energy as a basic right. Humanitarian actors should systematically advocate for the formal recognition of energy access as a fundamental right for displaced populations, particularly in restrictive policy environments like Bangladesh and Ethiopia. By leveraging empirical data from newly introduced projects, environmental risk assessments, and displacement-impact analyses, advocates can demonstrate the necessity of inclusive energy frameworks. Alignment with global commitments such as SDG 7 and national climate pledges can further legitimize these efforts, encouraging governments to integrate displaced communities into energy policies as rights-holders rather than temporary beneficiaries.

Promote market-based approaches in energy policy planning. To sustainably expand energy access, policymakers and donors should promote market-based approaches that engage displaced communities as active participants. Refugee-led enterprises, such as Okapi Green Energy in Kenya and Live in Green in Uganda, illustrate the potential of inclusive energy markets when supported through co-investment, technical assistance, and risk-sharing mechanisms. Concurrently, governments must address regulatory barriers such as Ethiopia's restrictive VAT policies on renewable energy imports to unlock private sector investment in displacement settings and beyond. These measures can transform refugees from aid recipients into entrepreneurs and customers within local energy economies.

Shift to multi-year, policy-aligned financing. The persistent reliance on short-term humanitarian funding undermines the scalability of energy solutions in displacement contexts. Donors should adopt multi-year financing mechanisms aligned with national policy cycles, as demonstrated by Uganda's World Bank-supported programs. Funding should prioritize durable infrastructure, robust monitoring systems, and market-based solutions while remaining adaptable to protracted displacement and host community needs. Predictable financing is critical to transitioning from fragmented projects to systemic, long-term energy access strategies.

Establish multi-stakeholder governance platforms. Inclusive energy planning requires institutionalized platforms that bring together governments, NGOs, donors, the private sector, and displaced communities. Proven models such as Uganda's Energy Working Group or Ethiopia's cross-ministerial coordination mechanisms can help resolve policy bottlenecks, harmonize interventions, and ensure accountability. Crucially, these platforms should include meaningful representation from displaced populations to ground decisions in local realities. By fostering collaborative governance, such platforms can bridge the gap between policy intent and implementation, ensuring energy solutions are equitable and sustainable.

01

GOVERNMENT ACTIONS

Revise policies to include displaced persons in energy planning and implementation. Eliminate access barriers and ensure budget allocations reach refugee-hosting areas.

02

DONOR ACTIONS

Support multi-year, flexible, and nationally aligned energy programs.
Catalyze systemic policy change beyond pilot models.

03

HUMANITARIAN ACTIONS

Advocate for policy integration and support refugee-led innovation.
Build joint platforms with energy ministries and private sector.

04

DISPLACED POPULATION

Displaced populations must have a voice in shaping the energy systems they rely on. Treat them as partners.

A CALL TO ACTION

THE URGENT NEED TO PRIORITISE INCLUSION IN ENERGY POLICIES.

The time for incremental progress is over. With over 120 million people forcibly displaced globally and the impacts of climate change deepening energy poverty, governments, donors, humanitarian actors, and development partners are required to act decisively to embed displacement into the core of national energy planning and implementation.

Governments should revise and enforce policies that legally and operationally include refugees and internally displaced persons in energy targets, financing strategies, and infrastructure planning. This includes eliminating access barriers, such as ID requirements for grid connection, and ensuring that budget allocations reach refugee-hosting areas.

Donors and development agencies must go beyond short-term projects to support multi-year, flexible, and nationally aligned energy programs that serve both displaced and host populations. Humanitarian actors must also leverage their frontline presence to advocate for policy integration, support refugee-led innovation, and build joint platforms with energy ministries, regulators, and private sector actors. This means reframing humanitarian energy work not as a parallel response but as a foundation for inclusive development. Above all, displaced persons themselves must have a voice in shaping the energy systems they rely on.

An inclusive energy policy is not just a moral imperative. It is a smart investment for resilience, for sustainability, and for a shared future where no one is left behind.

REFERENCES

[1] ICRC (2022) Partnerships, finance solution boost water access in DR.Congo. https://www.icrc.org/en/document/partnerships-financing-solutions-boost-water-access-dr-congo

[2] IRENA. (2015). *Africa 2030: Roadmap for a Renewable Energy Future*. International Renewable Energy Agency. https://www.irena.org/publications/2015/Oct/Africa-2030-Roadmap-for-a-Renewable-Energy-Future

[3] Women's Refugee Commission & Mercy Corps. (2020). *Inclusive Energy Access Handbook*. https://www.womensrefugeecommission.org/wp-content/uploads/2020/10/Inclusive-Energy-Access-Handbook-2020.pdf

[4] World Bank. (2022). *Leaving No One Behind: Rethinking Energy Access Programs in Displacement Settings*. Energy Sector Management Assistance Program (ESMAP). https://documents1.worldbank.org/curated/en/099530012072237207/pdf/P17514905315bf0a40b3d4071242447e86c.pdf

[5] UNHCR. (2023). *Clean Energy Case Studies: Kenya*. https://www.unhcr.org/sites/default/files/2023-07/clean_energy_case_studies_kenya.pdf

[6] UNHCR. (2018). *Uganda's CRRF Roadmap: National Action Plan to Implement the Global Compact on Refugees*. https://data.unhcr.org/en/documents/download/64290

[7] Global Compact on Refugees. (2018). *Comprehensive Refugee Response Framework*. https://www.unhcr.org/about-unhcr/overview/global-compact-refugees

[8] Ministry of Energy and Mineral Development [Uganda]. (2023). *Energy Policy for Uganda*. https://nrep.ug/document/energy-policy-for-uganda-2023/

[9] Ministry of Energy and Mineral Development [Uganda]. (2023). *Uganda Energy Transition Plan*. https://memd.go.ug/wp-content/uploads/2020/07/UgandaEnergyTransitionPlan-2023.pdf

[10] National Planning Authority [Uganda]. (2020). *Third National Development Plan (NDP III) 2020/21–2024/25*. https://www.npa.go.ug/wp-content/uploads/2023/09/NDP-III-English.pdf

[11] WWF Uganda. (2023). *100% Renewable Energy Policy Roadmap for Uganda*. https://wwfint.awsassets.panda.org/downloads/uganda_100re_policy_roadmap_report_2023.pdf

[12] Office of the Prime Minister [Uganda]. (2022). *Settlement Transformative Agenda (STA II) 2022–2027*. https://opm.go.ug/wpfd_file/sta-ii-2022-2027/

[13] Uganda Energy Credit Capitalisation Company (UECCC). *Electricity Access Scale-Up Project (EASP)*. https://www.ueccc.or.ug/project/electricity-access-scale-up-project-easp/

[14] Government of Kenya. (2018). *Kenya National Energy Policy*. https://policy.asiapacificenergy.org/sites/default/files/National%20Energy%20Policy%202018.pdf

[15] Government of Kenya. (2019). *Energy Act No. 1 of 2019*. https://kenyalaw.org/kl/fileadmin/pdfdownloads/Acts/2019/EnergyAct__No.1of2019.PDF

[16] Kenya Ministry of Energy. (2017). *Kenya Off-Grid Solar Access Project (KOSAP) – Marginalised Groups Framework*. https://documents1.worldbank.org/curated/en/750411490353382619/pdf/SFG3188-V1-IPP-P160009-Box402897B-PUBLIC-Disclosed-3-23-2017.pdf

REFERENCES

[17] GIZ & Ministry of Water and Energy [Ethiopia]. (2022). *Multi-Actor Cooking Energy Strategy for Refugees and Host Communities in Ethiopia (2022–2030)*. https://data.unhcr.org/en/documents/details/98109

[18] Ministry of Water and Energy [Ethiopia]. (2018). *Revised National Energy Policy of Ethiopia*. https://faolex.fao.org/docs/pdf/swa203987.pdf

[19] Ministry of Planning and Development [Ethiopia]. (2020). *Ten-Year Development Plan (2021–2030)*. https://www.mopd.gov.et/media/ten-year-document/ten_year_development_plan.pdf

[20] UNHCR & Government of Ethiopia. (2024). *Melkadida Refugee Compact (2024–2027)*. https://data.unhcr.org/en/documents/details/107301

[21] Ministry of Power, Energy and Mineral Resources [Bangladesh]. (2004). *National Energy Policy (NEP) 2004*. https://emrd.portal.gov.bd/sites/default/files/files/emrd.portal.gov.bd/law/b3868d02_274c_4f1a_bd2c_d81c5b4d7c32/NEP_2004_fulldoc.pdf

[22] Power Division [Bangladesh]. (2023). *Integrated Energy and Power Master Plan (IEPMP)*. https://powerdivision.portal.gov.bd/

[23] Sustainable and Renewable Energy Development Authority (SREDA) [Bangladesh]. (2022). *National Energy Balance 2021–22*. https://sreda.portal.gov.bd/sites/default/files/files/sreda.portal.gov.bd/page/639366d4_9e29_4fcd_975a_b0f345a49cff/2024-04-30-06-11-1eefba07a-c5af703bac17abc09d72a42.pdf

[24] Energy and Environment Technical Working Group (EETWG) [Bangladesh]. (2022). *Strategy for Energy and Environmental Sustainability in Cox's Bazar*. https://odihpn.org/publication/environmental-coordination-in-humanitarian-settings-case-study-of-the-energy-and-environment-technical-working-group-in-coxs-bazar-bangladesh/

energy@unitar.org
unitar.org