



Approach Paper

Evaluation of the EBRD's Green Economy Financing Facility (GEFF): Results and impact (2016-24)

EBRD INDEPENDENT EVALUATION DEPARTMENT •
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Abbreviations

BAT – Best Available Technology / Best Available Techniques

CSD – Climate Strategy and Delivery

DP – Donor Partnerships

EBRD – European Bank for Reconstruction and Development

EEC – Eastern Europe and the Caucasus

ESD – Environment and Sustainability Department

FI – Financial Institutions

FLRC – First Loss Risk Cover

GEFF – Green Economy Financing Facility

GET – Green Economy Transition

GTS – Green Technology Selector

IEvD – Independent Evaluation Department

IFI – International Financial Institution

ISSB – International Sustainability Standards Board

LLM – Large Language Model

MIS – Management Information System

MRV – Monitoring, Reporting, Verification

MSME – Micro, Small and Medium-sized Enterprises

PFI – Partner Financial Institution

SEE – South-Eastern Europe

SEFF – Sustainable Energy Finance Facility

SEI I & II – Sustainable Energy Initiative Phase I & II

SEMED – Southern and Eastern Mediterranean

SRI – Sustainable Resource Initiative

TC – Technical Cooperation

TCFD – Task Force on Climate-related Financial Disclosures

TI – Transition Impact

TIMS – Transition Impact Monitoring System

ToC – Theory of Change

VMS – Verification Management System

1. Introduction

1.1. Purpose of this evaluation

1. This paper outlines IEvD's approach for evaluating EBRD's Green Economy Financing Facility – a programmatic facility (“GEFF programme”).
2. As part of its 2026-28 Work Programme¹, the Independent Evaluation Department (IEvD) of the European Bank for Reconstruction and Development (EBRD) has launched a programme evaluation of the EBRD's Green Economy Financing Facility.
3. This evaluation builds on the 2015 evaluation of the EBRD's Sustainable Energy Financing Facilities (SEFFs)², which covered the period 2004-2014. A key recommendation from that earlier special study was to formalise a programmatic approach for SEFFs.³ GEFFs represent the evolution of SEFFs, adopting a programmatic approach with a broader scope and the inclusion of additional debt instruments⁴.
4. As the GEFF programme matures, it is timely to assess its efficiency, effectiveness, impact, and sustainability. This follow-on evaluation covers the GEFF programme from its inception in 2016 through 2024, with the objective of assessing the extent of its contribution to greener financial systems and the effectiveness of donor resources in supporting this goal.

1.2. Rationale of this evaluation

5. The climate crisis is intensifying, with rising greenhouse gas emissions, escalating physical risks, and insufficient progress toward Paris Agreement-aligned pathways. Current green policies in place around the world are projected to result in about 2.6 °C warming above pre-industrial levels⁵. As a multilateral development bank with a strong green transition mandate, the EBRD supports its economies in transitioning to low-carbon, climate-resilient, and resource-efficient models by scaling up green investment, mobilising private capital, and promoting enabling policies and standards.
6. GEFF programme is one of the EBRD's delivery platforms for operationalising the Green Economy Transition (GET) approach spanning both GET1.0 (2016-20) and GET2.1 (2021-25). Under GET 1.0, GEFF was framed as a scaleup green finance instrument, expanding into

¹ IEvD Work Programme 2026-28

² Special Study: EBRD's Sustainable Energy Financing Facilities (SEFFs), 2015

³ The 2015 evaluation called for formalising the programmatic approach to improve consistency and efficiency in the design, implementation, monitoring and evaluation of SEFFs. Accordingly, the IEvD recommended: (a) introducing regular programme-level evaluation; (b) systematic use of TI benchmarks and indicators; (c) adopting a common structure for project documentation; (d) ensuring a consistent approach to TC; and (e) coordinating SEFF-wide activities, including exploring the use of non-transactional TC funds to support SEFF-wide activities such as the SEFF website, annual conference and success stories dissemination.

⁴ GEFF Handbook

⁵ Climate Action Tracker (2024). Emissions pathways to 2100 - Climate Action Tracker. [online] Climateactiontracker.org. Available at: <https://climateactiontracker.org/global/emissions-pathways/>.

residential energy efficiency and using a programmatic approach to aggregate small energy and resource efficiency investments. Under GET 2.1 (2021–25), GEFF is positioned as a delivery platform that channels credit lines through partner financial institutions to expand access to low carbon technologies and deploy proven solutions, while also featuring in the wider GET toolkit as an example of a targeted, high impact green finance transaction and an integrated approach to addressing persistent market barriers.

7. As per its stated objectives, the GEFF programme aims, through local partner financial institutions, to:

- Expand access to climate finance and green technologies for households, MSMEs and corporates that would otherwise face constraints in financing climate and resource-efficiency investments.
- Strengthen local banking systems' capacity to assess, structure, and monitor green investments, embedding climate risk management and Paris-aligned strategies.
- Promote systemic greening by introducing green product lines, technology standards, classification systems, and improved reporting practices.
- Facilitate uptake of eligible green technologies by supporting manufacturers, vendors, and distributors.

8. Evaluating the GEFF programme will help understand how effectively the Bank leverages local financial sectors to deliver climate finance and investment in green technologies at scale and whether it advances systemic change in economies where the EBRD invests. A complementary line of enquiry will assess the value added of GEFF's programmatic approach in achieving these objectives. The findings will inform the next generation of GEFF programme, strengthen accountability to shareholders and donors, and support more efficient and impactful deployment of concessional and technical cooperation resources in line with the EBRD's strategic objectives.

9. As EBRD expands its mandate to Sub-Saharan Africa, the evaluation provides also an opportunity to assess the extent to which GEFF programme has delivered impact and additionality under different market conditions. Understanding how GEFF programme contributes to green investment mobilisation, technology adoption, and behavioural change in less mature markets will be particularly relevant for future operations in Sub-Saharan Africa, where demand-side constraints, affordability issues, and limited awareness of green technologies may shape outcomes. The evaluation's findings can therefore help clarify under what conditions GEFF is most likely to deliver transformational impact in new geographies.

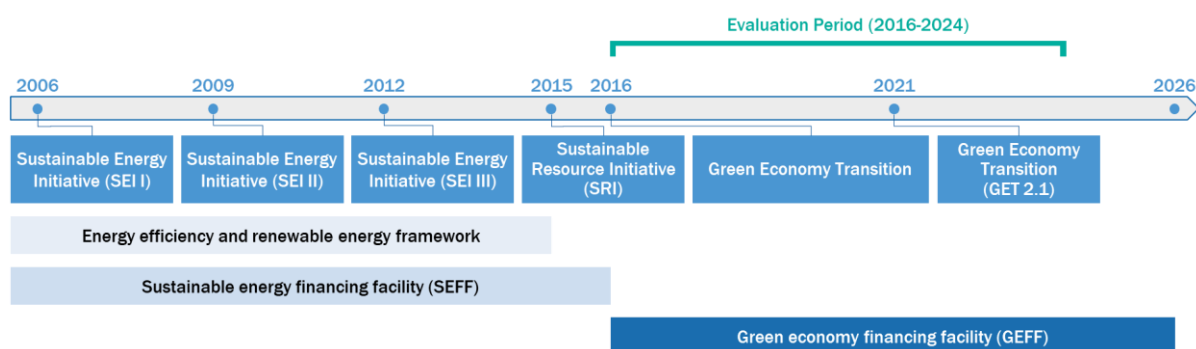
2. Unpacking the “GEFF programmatic approach”

10. The Green Economy Financing Facility (GEFF), launched in 2016, is an innovative financing programme designed to catalyse investment in climate finance and green technologies by addressing persistent barriers to green investment through local financial systems. GEFF channels EBRD financing to Partner Financial Institutions (PFIs), including local banks, microfinance institutions, and leasing companies, which on-lend to sub-borrowers investing in eligible green projects. Eligible investments span energy efficiency, renewable energy, water savings, waste reduction, circular economy, and green buildings, benefiting a wide range of end-users, from households and MSMEs to corporates, suppliers, service providers, and green technology manufacturers.

11. GEFF is described as a “programmatic facility” with a dedicated delivery architecture and governance model, alongside financing delivered through PFIs.⁶ Under this approach, GEFF is implemented through standardised documentation, eligibility rules, and processes that enable multiple eligible sub-projects to be financed under a common pillar. The programme builds on the experience of the Sustainable Energy Financing Facilities (SEFFs), introduced in 2004, which pioneered intermediary-based energy efficiency and small-scale renewable energy finance delivery in EBRD countries of operation.

12. The Independent Evaluation Department’s 2015 Special Study on SEFFs recommended a shift toward a more explicit programmatic approach, noting the need for greater consistency, clearer intervention logic, and stronger learning at the programme level. Launched in 2016, GEFF reflects this shift, with an expanded mandate aligned with the Green Economy Transition (GET) agenda and stronger focus on embedding green finance capabilities within local financial systems rather than delivering stand-alone transactions (Figure 1).

Figure 1: Timeline of SEFFs and introduction of GEFF



Source: IEVD elaboration (2026).

⁶ According to the Methodology to determine the green finance attribution of EBRD investments (2025) and the Board approval documents for GEFF facilities.

13. The GEFF programme design combines green financing with a package of accompanying support aimed to address barriers to green investment including high upfront costs, limited awareness, perceived technology and credit risk, and technical capacity gaps among both PFIs and end-borrowers. Financial incentives are deployed selectively, informed by market assessments, to support the uptake of advanced green technologies where affordability or risk perceptions remain binding constraints.

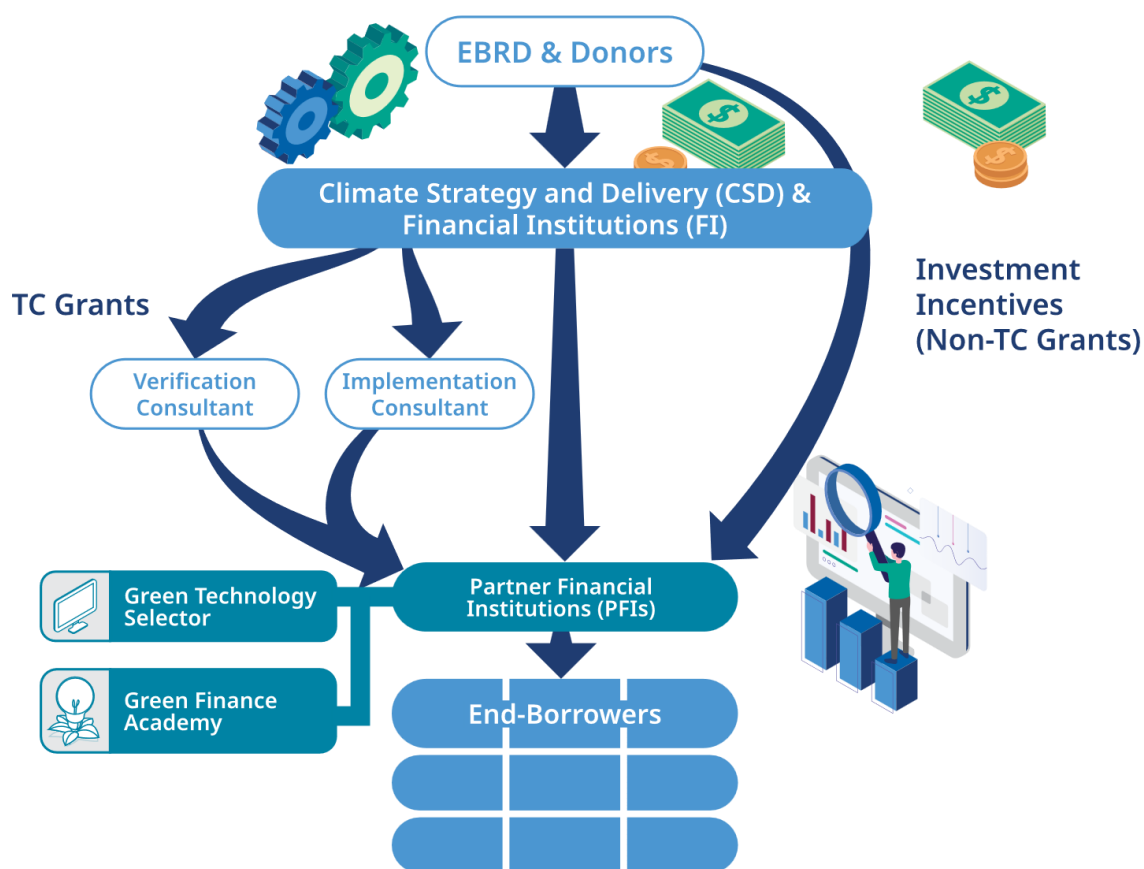
14. This financing is complemented by technical assistance delivered by Facility Consultants and international/local experts. These services support PFIs in developing and implementing green financial products, building origination and appraisal capacity, and integrating green finance into routine operations, while assisting sub-borrowers with project preparation and documentation. Delivery is further supported by a set of digital tools, including the Green Technology Selector (GTS), which provides information on eligible and high performing technologies; the Management Information System (MIS), which supports verification and incentive claims; and the Verification Management System (VMS), which is used for selected GEFF facilities only and is not available universally across the programme.

15. GEFF delivery is organised around a set of standardised processes and documentation applied across countries. Eligibility criteria, monitoring and MRV requirements, and related guidance are set out in Methodology to determine the green finance attribution of EBRD investments⁷, and GEFF specific materials, such as Policy Statements, and Operations Manuals, supported by standard templates and reporting tools. These arrangements are intended to promote consistency, transparency, and efficient across facilities while allowing adaptation to country-specific contexts.

16. Implementation is guided by Action Plans agreed among PFIs, Facility Consultants, and the EBRD. Financial Institutions (FI) and Climate Strategy and Delivery (CSD) departments oversee the facility lifecycle; PFIs originate, manage and monitor sub-loans; and Facility Consultants support implementation through technical assessments, verification, and MIS related tasks (Figure 2).

⁷ [Methodology to determine the green finance attribution of EBRD investments, 2025](#)

Figure 2: GEFF programme operating model



Source: IEvD 2026

17. Donor funding plays a central role in supporting GEFF delivery. It finances technical cooperation activities such as market development, product design, PFI staff training, and project assessment and verification and, in some contexts, also supports non-TC instruments, including investment incentives, first-loss risk covers (i.e., guarantees) and concessional loans. Incentive claims are processed through consultant verification and EBRD approval before funds are transferred to PFIs for crediting to sub-borrowers. Policy dialogue activities may also be associated with GEFF in some contexts, but these are typically pursued alongside country or regional engagement rather than as a transaction-embedded component.

18. Taken together, these features position GEFF as a programme that can be deployed across countries over multiple phases, rather than as an administrative framework focused solely on deploying EBRD finance. The GEFF programme is intended to support market development and institutional learning over time, enabling green finance to move from a supported activity to a mainstream component of local financial markets.

2.1. Previous evaluation work related to Green Financial Systems

19. **The Independent Evaluation Department (IEvD) has conducted several evaluations directly or indirectly related to the Bank's green financing efforts.** In particular, the department's 2015 evaluation (SS14-080) of the EBRD's Sustainable Energy Finance Facilities (SEFFs), its 2019 evaluation of the EBRD's Climate Initiatives, and the evaluation of the EBRD's Green Economy Transition (GET) 2.1 Approach (SS25-197) all serve as a substantial foundation for this evaluation (Box 1).

Box 1 - Key evaluation insights from previous evaluation work related to Green Financial Systems.

All three evaluations found that EBRD's green finance initiatives were strategically aligned with the Bank's priorities and country needs, but their designs sometimes lacked clear logic linking interventions to intended outcomes.

- The 2015 SEFF study noted that while facility goals reflected EBRD strategies and local market assessments, Board approval documents did not always articulate how specific market barriers were addressed by the chosen design features.
- Likewise, the 2025 GET 2.1 evaluation concluded that an explicit Theory of Change (ToC) and concrete performance pathways were missing, making the "systemic change" ambition difficult to operationalise consistently.
- These programs, while ambitious and well-aligned, would have benefited from more clearly defined result frameworks (the SEFF evaluation in fact recommended formalising a programmatic approach for such facilities) and better-defined outcome metrics at entry to guide implementation and future designs.
 - The Green Economy Transition Strategy 2026-30, approved in March 2026 and aligned with the Management Action Plan (MAP) responding to the 2025 GET 2.1 evaluation, is intended to address several of these gaps. The Strategy introduces a Theory of Change that links inputs – including capital, staff resources, donor funding and partnerships - to outputs, client-level outcomes and market-level outcomes. It also envisages an integrated results management architecture, anchored in the ToC, to track the full results chain and strengthen the measurement of systemic impact.

The evaluations highlight strong delivery mechanisms that enabled these programmes to meet or exceed their immediate targets, as well as some operational weaknesses.

- SEFFs, for example, surpassed their financial and technical benchmarks, thanks to factors like effective technical cooperation, experienced consultants supporting partner banks, streamlined approval processes, and well-calibrated incentive schemes for sub-borrowers. However, the reviews also point out challenges: delivery was resource-intensive, and some partner financial institutions (PFIs) became dependent on consultant support, raising concerns about sustaining green lending once donor-funded assistance ends.
- Internally, as the GET 2.1 Strategy's headline target emphasises GET finance volume, staff incentives and project appraisal processes tended to incentives growth in overall GET

Box 1 - Key evaluation insights from previous evaluation work related to Green Financial Systems.

finance, with less emphasis on the achievement of the distinct mitigation/adaptation outcomes.

- These findings suggest that while execution was efficient, future programmes should invest in building local capacity (so that PFIs can continue green lending independently) and align internal performance metrics with long-term climate results rather than short-term volume goals.

In terms of outcomes, the three evaluations indicate that EBRD's green finance programmes delivered significant immediate benefits but have struggled to demonstrate longer-term or transformational impacts. A recurring weakness identified is the lack of effective monitoring systems and learning feedback loops to track outcomes and inform improvements.

- The SEFF evaluation showed strong positive effects, including energy savings, CO₂ reductions, greater awareness and technology adoption, with self-sustaining markets for sustainable energy finance emerging in some countries. Policy dialogue (e.g., BeSEFF, KyrSEFF) helped catalyse legal and institutional reforms for energy efficiency. However, while short-term indicators were tracked, there was no uniform system for longer-term monitoring: key outcome indicators (such as market sustainability) were defined but not measured after facilities closed, and lessons learned were not systematically captured in project documents.
- The Climate Initiatives (2019) and GET 2.1 evaluations found that, despite meeting investment targets and reinforcing EBRD's standing in climate finance, it was difficult to demonstrate actual climate impact or market change. Results data were fragmented and relied heavily on ex-ante estimates, with no systematic ex-post verification of energy savings or emissions reductions and department-level datasets that could not be reconciled. As a result, evidence of realised emissions reductions and sustained green market growth attributable to the programmes was limited.
- The GET 2.1 evaluation acknowledges progress with the new Green MRV (Monitoring, Reporting, Verification) system for projects signed since July 2022, which tracks the ex-post outcomes over time, as defined at approval in the Green Project Monitoring Plan (GPMP), which sets out the timeframe and frequency of client reporting. However, the evaluation points out that data use remains suboptimal, with green financing results often conflated with transition impact metrics, and some methodologies (e.g., private mobilisation) potentially overstating contributions.
 - In response to the GET 2.1 evaluation, the MAP sets out a number of important follow-up actions. By end-Q1 2026, Management intends to review green-related implementation modalities and to improve complementarity and internal consistency, including through clearer linkages between green assessments and transition impact. It also plans to review green metrics and recommend improvements to the collection and use of green assessment and monitoring data. In addition, by Q2 2026; Management is expected to review its approach to green private indirect mobilisation (PIM) in response to the recommendation to strengthen the effectiveness and credibility of its green mobilisation efforts.

20. Taken together, these previous evaluations provide a substantial evidence base on the strengths and recurring challenges of the Bank's green finance initiatives. In particular, the need for clearer articulation of intervention logic, more consistent and outcome-oriented monitoring systems, stronger links between market barriers and instrument design, and more robust approaches to assessing systemic change. Building on these insights, the present evaluation incorporates these lessons in shaping both its scope and core evaluation questions, ensuring that the GEFF programme evaluation builds systematically on prior findings and addresses the gaps and recommendations identified in earlier studies.

2.2. Snapshot of the “GEFF programme portfolio”

21. The GEFF programme over 2016-2024 encompasses 39 country-level GEFF facilities⁸, 212 sub-operations, across 22 countries in six EBRD regions.⁹ Cumulative EBRD GET Finance¹⁰ reached approximately €3.135 billion, channelled via 119 Partner Financial Institutions (PFIs). As of January 2026, the stock of EBRD's 2016-2024 GEFF operations amounted to approximately €3.01 billion signed with PFIs, of which 98.7% (€2.97 billion) has already been disbursed to PFIs, indicating a near complete EBRD disbursement ratio.¹¹ Grant support has totalled €209 million (7% of EBRD GET Finance), comprising €85 million for technical cooperation (TC)¹² and €125 million for non-TC incentive grants.

⁸ Investment frameworks (FWs) group multiple related transactions under a common set of parameters (e.g., eligibility criteria, documentation and approval arrangements), with individual transactions processed within the agreed parameters. Some FWs include delegated approval provisions for eligible sub-operations below a specified financing threshold. Frameworks typically set out Transition Impact (TI) arrangements and monitoring: sub-operations are monitored annually (with TI updates and indicators recorded in Monarch, where applicable), and the FW is monitored every two years through aggregated reporting at FW level (including updates at key milestones such as new approvals/renewals and, where relevant, donor reporting).

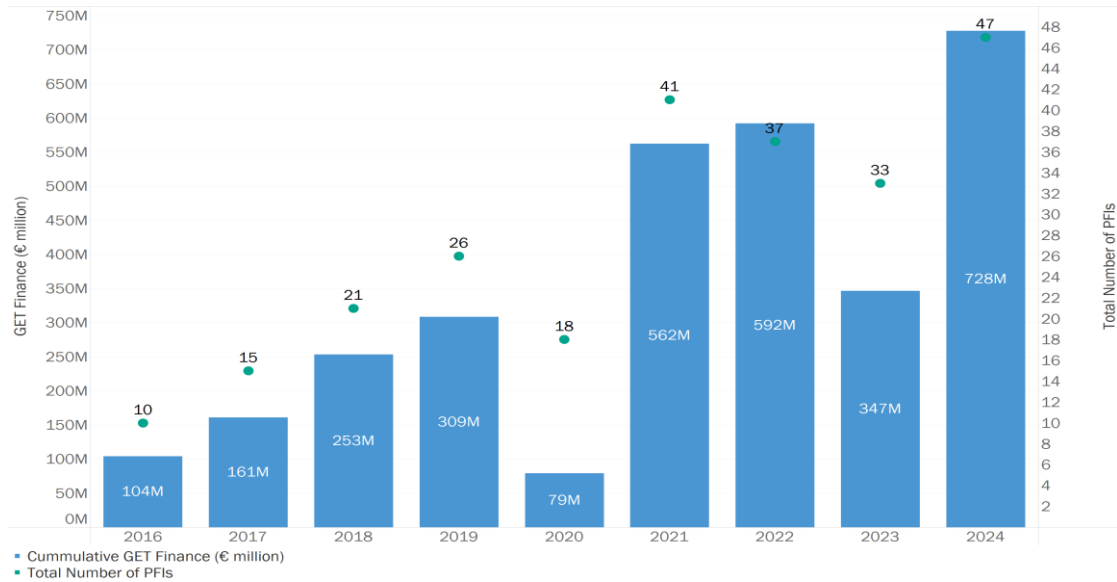
⁹ The dataset includes all GEFF facilities approved by the Board between 2016 and 2024 and covers facilities across all operational statuses and lifecycle stages - active and complete, including signed, disbursing, completed, and repaying that were signed between 2016 and 2024.

¹⁰ “GET Finance” refers to the share/amount of EBRD financing identified as qualifying for the Green Economy Transition (GET) in line with the qualifying criteria and MRV guidance set out in the GET Handbook. Under the GET 2.1 definition, GET finance covers both climate finance (as defined in line with joint MDB definitions) and EBRD-specific environmental finance. Unless otherwise stated, all figures in this paper refer to the “GEFF portfolio” as defined in this Approach Paper (i.e., the dataset covering GEFF facilities approved between 2016 and 2024 and the associated operations/facilities included in that definition).”

¹¹ The difference between GET Finance figures and the current stock of EBRD finance signed with PFIs for the 2016–2024 GEFF portfolio as defined in this Approach Paper is explained by exchange-rate fluctuations and a small number of facilities that were cancelled after signing. These cancellations have not been reflected in the GET Finance data, resulting in a divergence between the two totals.

¹² Two projects in this portfolio were approved and signed with a dual use-of-proceeds structure, covering both GEFF and Women in Business (WiB). In these cases, TC funds were approved for both purposes; however, it is not yet clear how much of the TC allocation is specifically earmarked for GEFF.

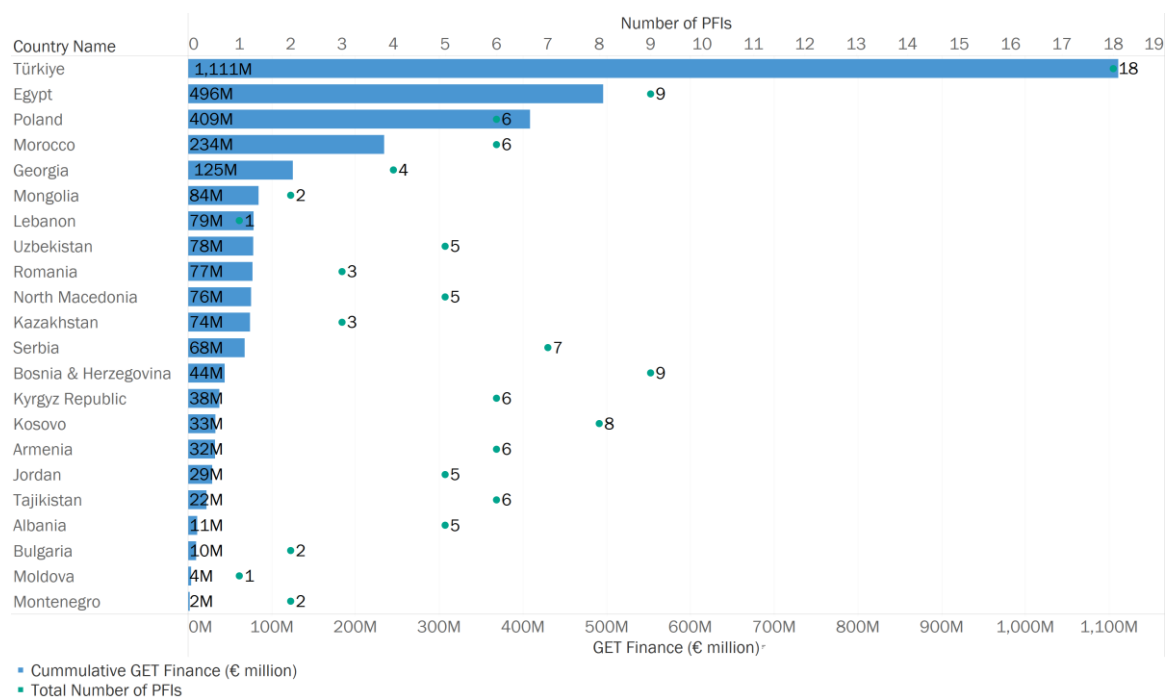
Figure 3: GEFF Facilities, EBRD GET Finance (€ million), 2016-2024



Source: EBRD internal reports; **Note:** Annual GET Finance figures reflect the transactions (i.e., facility or tranche level) that were signed in that given year (Fac Signed Date).

22. Despite its wide geographic footprint, the portfolio is highly concentrated. Türkiye alone accounts for €1.111 billion in GET Finance, i.e., about one-third of the total GET Finance. Egypt (€496 million), Poland (€409 million), Morocco (€234 million), and Georgia (€125 million) follow, with the top five countries comprising roughly 76% of the total portfolio. The remaining 17 countries each represent smaller shares (Figure 4).

Figure 4: GEFF Facilities, Geographic Concentration, 2016-2024

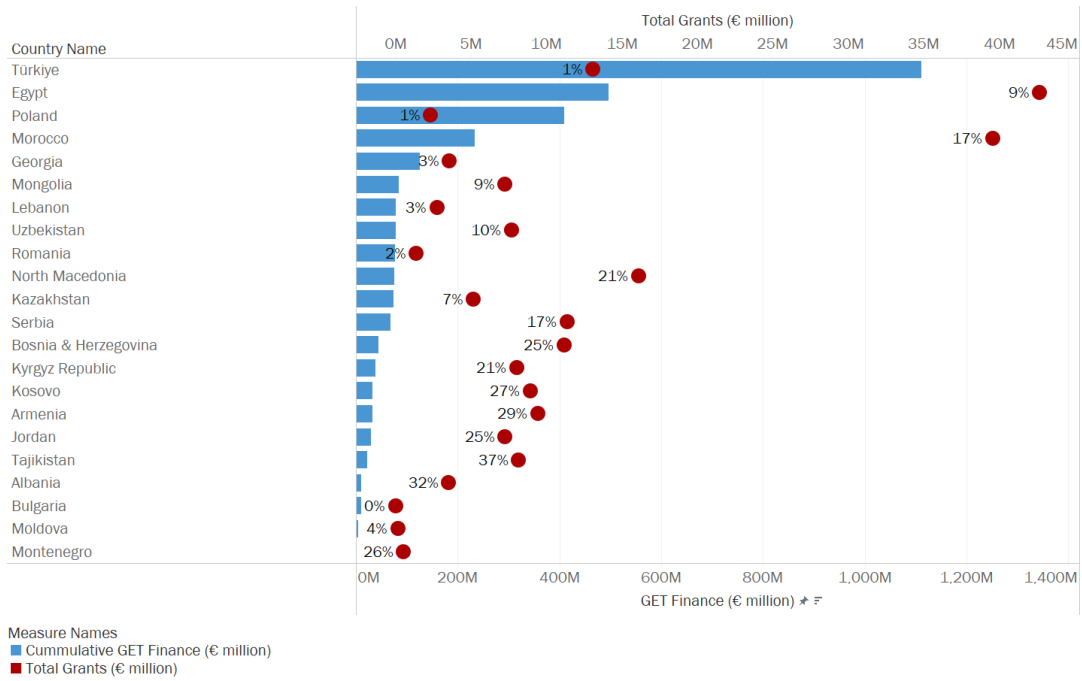


Source: EBRD internal reports.

23. **Donor funding is used in GEFFs to support technical assistance, sub-borrower incentives, guarantees and concessional loans.** The average grant intensity (i.e., including TC and non-TC grant components, and excluding concessional loans and guarantees) is 15% with variation across facilities. For example, Poland's and Türkiye's GEFF shows lower levels (1%) of grant support, while Tajikistan's GCF backed GEFF exhibits grant intensity of 37%. Regional facilities in SEE, EEC and SEMED record grant intensity ratios in the range of 17–29% (Figure 5).

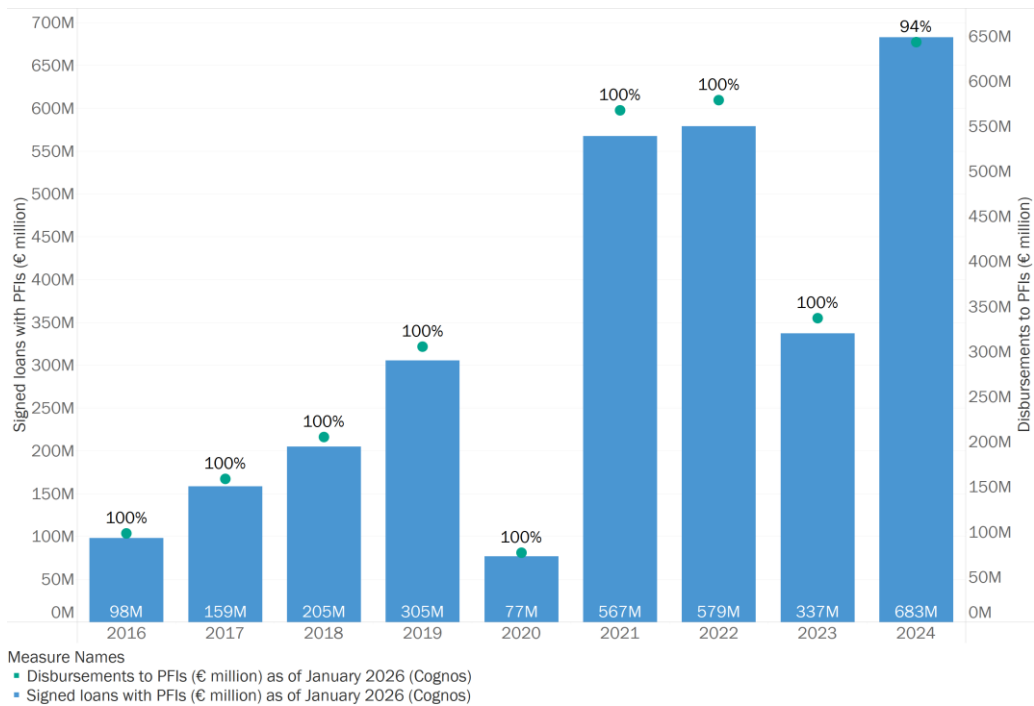
24. **By January 2026, nearly all approved GEFF facilities have been signed and disbursed to PFIs.** While this indicates effective intermediary-level uptake, it does not guarantee full on-lending to end-borrowers. Some late-2024 facilities were still in early implementation, and sub-loan data will be reviewed separately (Figure 6).

Figure 5: GEFF Facilities, % of Grant Intensity, 2016-2024



Source: EBRD internal reports. Note: Total Grants reflect TC and non-TC grant components (i.e., incentives). % Grant intensity, therefore, excludes concessional loans and guarantees.

Figure 6: GEFF Facilities, Signed and Disbursed Loans with PFIs (€ million), 2016-2024






Source: EBRD internal reports. Note: Figures reflect the transactions (facility level) that were signed in that given year (Fac Signed Date)

3. Evaluation scope and methods

3.1. Objective and scope

25. **The overarching objective of this evaluation is to assess the extent to which GEFFs have contributed to greener financial systems in EBRD economies, and how effectively donor resources – including concessional finance and technical cooperation – have supported this contribution (Table 1).**

Table 1: Objective of the evaluation of GEFF

|  Greening of financial systems |  Sustainability beyond the GEFF programme |  Role of donor resources |
|---|--|---|
| <ul style="list-style-type: none"> • Expansion of green lending beyond business-as-usual trends. • Demonstration effects and influence on market development. | <ul style="list-style-type: none"> • Continuation of expansion of green products, volumes, and institutional capabilities after programme completion. | <ul style="list-style-type: none"> • Contribution of grant incentives, technical cooperation, and verification functions to outcomes |

26. **This objectives anchors the evaluation on GEFF's core value proposition: expanding and institutionalising green lending by providing financing to and developing the capacity of PFIs, using a programmatic delivery model.** GEFF facilities are expected to deliver market outcomes such as expanded access to green finance and greening of financial systems, creating an enabling environment where partner financial institutions embed sustainability into their core operations and accelerate the transition to a low-carbon economy. This is where any “systemic change”, if it occurs, would be expected to materialise.

27. **Accordingly, the evaluation will use triangulated evidence to assess whether and how GEFF facilities plausibly contributed to market-level outcomes** by expanding access to green finance, embedding green finance capabilities within PFIs, and supporting the broader greening of financial systems. The GEFF programme reaches businesses and households by working through PFIs and their market ecosystems, to connect climate finance and investment in green technologies with local demand, while strengthening financial institutions' capacity and supporting awareness and uptake in

local markets. Complementing the focus on PFIs, the evaluation will therefore examine the portfolio composition (e.g., MSMEs, households, priority sectors/regions) and changes over time.

28. While GEFF-supported sub-loans generate estimates of energy savings and CO₂ reductions, the evaluation will not assess high-level (economy/country level) green transition impact, such as climate mitigation and associated reductions in CO₂ emissions. Data available is based on ex-ante estimates that may not be representative of real impact, and calculating actual (ex-post) data would require resources that go beyond those available for this evaluation. In addition, this assessment would have limited value beyond a strict accounting exercise. Indeed, such outcomes emerge from the interaction of multiple factors, including national climate policies, regulatory frameworks, technology costs, broader market dynamics, and the actions of multiple public and private actors. They are therefore better assessed against national climate objectives and long-term decarbonisation pathways, rather than within the boundaries of a single EBRD funded instrument programme.

29. The evaluation scope covers sub-operations, transactional and non-transactional TCs (e.g., GEFF linked transition plans and corporate climate governance), donor funds, the Green Technology Selector, Green Finance Academy, and policy engagement activities associated with GEFF programme from its inception through 2016–2024.

30. The evaluation will apply a dual lens:

- **Results:** the evaluation will assess, where evidence permits, emerging market and system-wide effects associated with GEFF facilities (Annex 3). This will include consideration of changes in the structure and composition of green lending, the diffusion of green products and standards beyond PFIs, the evolution of regulatory and supervisory expectations on climate and environmental risk, and the extent to which key segments such as MSMEs, corporates and households are being reached and supported in the transition.
- **Delivery model:** complementing the results focus, the evaluation will assess the extent to which GEFF's programmatic approach has proven fit for purpose as an operational modality. i.e., whether the GEFF programme operating model and delivery architecture (including standardised processes and tools, implementation/verification arrangements, and associated support functions) have supported effective programme delivery across contexts. This includes assessing the role and use of donor resources within different GEFF facilities.

31. As outlined in Section 2.2, given the geographical distribution of the GEFF facilities, it is not feasible to assess market and system-wide effects across all programme regions. Therefore, IEvD has preliminary selected three country case studies that reflect different stages of transition, and levels of donor engagement. The criteria and process for selecting countries for in-depth case studies are detailed in Section 3.3.

3.2. Evaluation questions

The evaluation will seek to address **one overarching question**:

To what extent has the GEFF programme contributed to greener financial systems, and how effectively have donor resources supported its implementation and outcomes?

32. To answer the overarching question, the evaluation team has identified three specific questions and sub-question to guide this evaluation.

EQ1: To what extent has GEFF programme expanded access to green finance and supported the greening of local financial systems?

33. The evaluation will combine programme-level portfolio evidence from PFIs with country-level market signals to determine whether GEFF has increased green finance beyond business-as-usual and contributed to wider system greening.

34. At the programme level, the evaluation will assess effectiveness by determining whether GEFF increased the absolute volumes of green finance – such as the EUR amount of green lending (origination and/or outstanding, where available) and the number of green sub-loans – and whether it also increased relative measures, including the share of green lending in PFIs' total portfolios, compared to a baseline period. The analysis will use year-by-year trends to compare (i) changes in absolute green lending volumes and counts with (ii) changes in overall lending volumes and will also track how the green lending ratio evolves over time to distinguish genuine expansion from portfolio re-labelling or shifts driven by changes in total lending. This assessment will rely primarily on internal monitoring data and scorecards, facility implementation progress reports, and verification/implementation consultant reports, complemented by PFI portfolio data to reconstruct baseline vs during/after GEFF trajectories.

35. To assess whether access expanded to intended client groups, the evaluation will analyse changes in portfolio composition (e.g., MSMEs, households, priority sectors/regions) by examining the distribution of GEFF sub-loans and identifying whether GEFF enabled entry into new PFIs and new segments. These quantitative findings will be triangulated with surveys and semi-structured interviews to test the plausibility of the causal pathway (for example, whether increases reflect new origination and product development rather than re-labelling of pre-existing green lending).

36. At the country level, the evaluation will test whether green finance is spreading beyond GEFF participants by examining whether non-GEFF institutions began offering green products during GEFF implementation and whether GEFF-type practices (product structures, eligibility/taxonomy language, disclosure) are replicated. This assessment will be supported by sector-wide banking datasets (e.g., Orbis/Bankscope, S&P Sustainability Data Suite) to compare GEFF partner financial institutions (PFIs) with non-participating banks and to characterise changes in sectoral lending patterns. It will also draw on a structured review of public disclosures (e.g., transition plans, sustainability reports, Pillar 3 climate

risk reporting, and TCFD/ISSB disclosures). Using LLM-assisted web scraping¹³, the evaluation team will identify potential convergence toward GEFF-like eligibility criteria, product offerings, and risk/disclosure practices. To triangulate whether any observed diffusion is plausibly linked to GEFF influence, rather than to unrelated regulatory shifts or parallel initiatives, the evaluation team will also analyse policy dialogue and regulatory documents, central bank publications, and interviews with regulators, banking associations, donors/IFIs, and PFIs.

37. The evaluation will review and analyse changes over time in the eligible technologies approved under the Green Technology Selector, using these changes as an indicator of whether the eligible green technology offer evolved in line with broader market-level supply-side developments. The analysis will also reflect the underlying process whereby candidate technologies are assessed by consultants and then reviewed and approved by the relevant team in ESD.

38. Finally, the evaluation will assess the extent to which GEFF's programmatic approach has proven fit for purpose as an operational modality in supporting the outcomes listed above. This will cover both external and internal implementation matters, including the fit for purpose of GEFF's delivery architecture, implementation and verification arrangements, and the internal systems, tools, and processes that support delivery, monitoring, and reporting. In particular, the analysis will consider whether arrangements related to grant and consultant management, donor reporting, and systems such as the GEFF MIS have enabled uptake and delivery across facilities or introduced operational constraints and risks.

39. Key sub-question to address EQ1 include:

- *To what extent did the GEFF programme expand the volume and share of green lending beyond business-as-usual compared to pre-programme trends, including through potential demonstration effect?*
- *To what extent was the GEFF programme, including its governance, standardisation, and donor instrument mix, fit for purpose as a replicable, multi-phase delivery model across countries with differing levels of market maturity?*

EQ2: Are GEFF programme-supported green products and lending volumes sustained once funded instruments and subsidies end, and to what extent have PFIs institutionalised green finance capabilities within their core operations?

40. The evaluation will assess whether GEFF's results are durable once funded instruments, subsidies/incentives, and external consultants are withdrawn, and whether PFIs have institutionalised the capabilities required to sustain green finance as routine business. At the outcomes level, sustainability will be judged by whether PFIs continue to offer and actively market the green products

¹³ Structured extraction of information from publicly available disclosures and related published materials to identify possible convergence toward GEFF-like practices. In this evaluation, such analysis will be treated as supporting evidence only. Because public disclosures vary in depth, terminology, comparability, and timing, and may also reflect regulatory factors, they cannot on their own support strong inferences about GEFF-specific institutionalisation. IEvD will therefore use structured extraction methods and triangulate findings with interviews, document review, and other external evidence.

introduced under GEFF and whether post-programme trends in green lending volumes and portfolio shares are stable or growing in the 2–3 years following the last disbursement or incentive payment. The evaluation team will also test whether green lending is increasingly financed through PFIs' own balance sheets or commercial sources rather than ongoing reliance on IFI/donor support, as this is a key indicator of mainstreaming and post-programme viability. This analysis will draw on internal monitoring data, and facility monitoring data, consultant reports and donor reports, combined with PFI portfolio data to track post-GEFF trajectories; interviews and surveys will be used to interpret inflection points and contextual drivers; for example, whether changes reflect shifts in underlying demand.

41. Institutionalisation will be assessed through evidence that green finance has been embedded in internal processes, risk management, governance, and staff capability. Specifically, the evaluation team will review PFI credit manuals, risk guidelines, and internal procedures (where feasible) to assess the integration of climate/environmental criteria into credit and risk systems. It will also assess operational indicators such as the relative time and cost of processing green loans versus conventional lending, and portfolio quality metrics (e.g., NPL ratios for the green portfolio compared with the overall portfolio, before versus during/after the GEFF programme). Governance embedding will be assessed through document review and interviews across credit, risk, sustainability, and IT functions, focusing on whether GEFF eligibility criteria, technology lists, and screening tools have been integrated into standard systems, and whether formal ESG and climate policies, transition plans have been approved at the appropriate governance level. Finally, the evaluation team will assess whether PFIs have retained and reproduced internal know-how by verifying, through interviews and surveys, whether tools and processes are being used without external consultant support. Sustained volumes without institutionalisation may signal temporary market conditions, whereas institutionalisation without volumes may point to external constraints – this question is designed to diagnose both.

42. Finally, the evaluation will assess whether GEFF's programmatic approach, anchored in tools and activities such as the Green Technology Selector, the Green Finance Academy, and PFI-level Transition Plan policy dialogue, supported by standardised processes and delivery arrangements, has been fit for purpose in supporting sustainability beyond the programme. It will examine in particular whether these features have embedded the capabilities required for PFIs to maintain green financing once funded instruments, subsidies/incentives, and external consultants are withdrawn.

43. Key sub-question to address EQ2 may include:

- *Are green products and origination maintained or expanded post programme without incentives/consultants? When incentives stopped, how did origination volumes, ticket sizes and pricing adjust?*
- *To what extent were policies, risk tools, MRV and disclosure institutionalised within PFIs?*
- *To what extent did GEFF delivery arrangements, including technical assistance, tools, and capacity-building support, factor in exit strategies to support institutionalisation of PFI capabilities?*

EQ3: How effective and efficient are different donor funding models and levels of concessionality within GEFF programme?

44. **The evaluation will assess donor support and levels of concessionality across GEFFs to determine whether resources were appropriately matched to market barriers and whether they generated strong additionality.** The first judgement focuses on alignment: the evaluation team will assess whether the selected blend of instruments (investment grants, interest rate incentives, guarantees, implementation/verification consultants, and policy dialogue) is explicitly linked to the binding market failures in each context – such as affordability constraints, perceived technology risk, capacity gaps in origination/MRV, or regulatory/disclosure gaps – and whether differences in donor intensity correspond to differences in market maturity and needs. This will draw on donor funding agreements, policy statements and market assessments, supplemented by internal interviews (Donor Partnerships, and relevant operational counterparts) and external interviews with donors and PFIs. The evaluation team will also undertake facility- and portfolio-level mapping of inputs against outputs/outcomes (e.g., which facilities had higher TC intensity, stronger incentive components, more consultant involvement) and compare performance across these models using consistent outcome measures such as origination, portfolio growth, MRV quality proxies and evidence of institutionalisation.

45. **The second judgement focuses on additionality; both financial and non-financial.** Financial additionality will be assessed through metrics such as leverage and changes in funding structures, while non-financial additionality will be assessed through structured evidence on whether financed projects would have been smaller, delayed, or not undertaken absent GEFF programme. Non-financial additionality will be captured through evidence of innovation enabled (new technologies, new client segments, or riskier sectors) and capability gains attributable to donor-supported functions (e.g., verification, and tool deployment). These findings will be triangulated through interviews with PFIs, donors and internal stakeholders and through review of additionality assessments and market evidence. The overall intent is to move from “how much donor support was provided” to “which combinations of donor instruments are most efficient and effective under which market conditions,” producing usable benchmarks for when additional donor funds are justified and how concessionality should be calibrated.

46. **The evaluation will assess whether GEFF concessionality has been appropriately calibrated to avoid long-term market distortion while supporting market creation and deepening.** This includes assessing whether incentive levels decline as markets mature, whether exit pathways from concessional support are clearly articulated and implemented, and whether GEFFs encourage the gradual crowd-in of private finance rather than prolonged reliance on donor resources. The analysis will draw on cross-country comparisons, time-series evidence where available, and qualitative insights from PFIs and donors on how concessionality has evolved and whether it has supported sustainable, self-standing green finance markets.

47. **The evaluation will also assess whether GEFF's programmatic approach has been fit for purpose as part of the donor-supported delivery “package”, focusing on how donor resources are structured and used within GEFFs.**

48. **Key sub-question to address EQ3 may include:**

- *How do different intensities and mixes of donor support (TC, incentives, implementation/verification consultants, policy dialogue) affect GEFF programme performance (origination, MRV quality, institutionalisation) across countries/regions?*
- *Was the programmatic approach applied to the allocation of donor funds? What benchmarks/criteria guide where additional donor funds are required (e.g. market maturity, regulatory gap, affordability, inclusion, technology risk)?*

3.3. Selection of case countries

49. **The proposed countries for the in-depth country cases were identified purposively, based on a structured screening of the GEFF programme portfolio rather than statistical representativeness.** The aim was to identify GEFF facilities at country-level that are information-rich for the evaluation questions and that reflect the diversity of GEFF operating contexts.

50. The selection process was guided by two considerations:

1. **Transition diversity** – the sample explicitly spans both more advanced and less advanced transition countries. It draws on the Bank's transition classifications to capture variation in stages of market development, regulatory maturity, and the depth of local financial sectors.
2. **Portfolio-level differentiation (refer to Annex 2)** – portfolio data were used to differentiate GEFF facilities along the following quantitative dimensions:
 - **Facility scale (EBRD GET finance amount) and number of participating PFIs in the GEFF programme** – larger facilities and a higher number of participating PFIs may signal broader market coverage and a higher potential for systemic impact.
 - **Intensity of TC and non-TC (incentives) grants** – level of donor funding (TC and incentives) relative to EBRD Finance (GET Finance), distinguishing “light-touch” donor involvement from facilities with substantial grant funding. This is critical for understanding how donor funds influence affordability, uptake, and market transformation.

51. **Applying these dimensions, IEvD selected three illustrative country case studies that reflect differences in transition classification, donor intensity, and market coverage (Table 2). These countries are Türkiye, North Macedonia, and Egypt.** If visits to the primary countries are not feasible, an alternative set of countries will be used that maintains comparability across the same screening dimensions; transition classification, facility scale/market coverage, and grant intensity, ensuring that evaluative insights remain robust even if visit locations change.

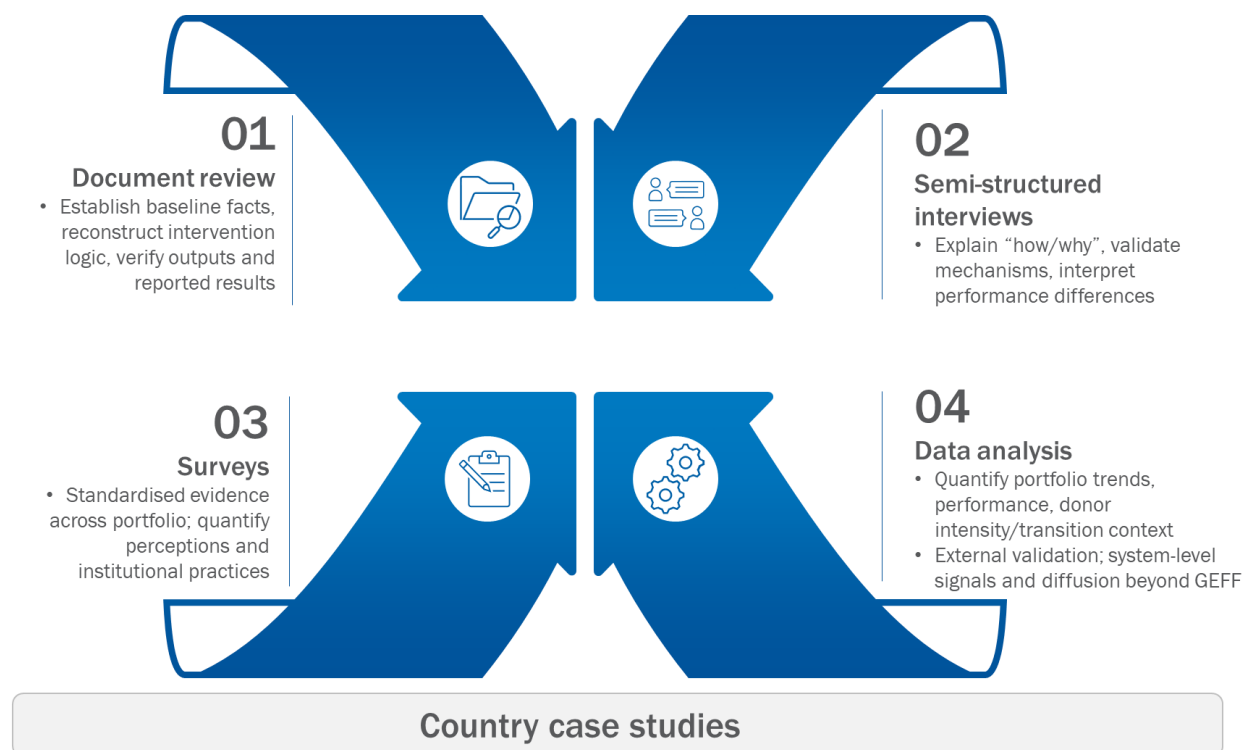
Table 2: Primary country case studies

| GEFF Countries | Rationale |
|-----------------|---|
| Türkiye | Türkiye represents an advanced transition context and, across its GEFF facilities, the largest scale in the screened GEFF programme portfolio (€1.111 billion in GET Finance and 18 participating PFIs), while maintaining very low grant intensity (1%) and a TC-only profile, making it a strong benchmark for examining GEFF delivery in a more mature market with limited concessionality. In addition, with COP31 scheduled to take place in Antalya, Türkiye, in November 2026, a Türkiye case study offers timely, high-visibility evidence on what works (and what constrains delivery) in scaling green finance through financial intermediaries, helping ensure the evaluation's findings and practical lessons can potentially inform wider policy and market discussions. |
| North Macedonia | North Macedonia represents a less advanced transition context, with smaller scale GEFF facilities. The programme includes €75 million in GET Finance through 5 participating PFIs, with high grant intensity (21%) and incentives component (16%). This provides a useful basis for assessing how donor resources affect affordability and demand for green finance, and whether incentives and accompanying TC support contribute to market development and longer-term transformation in an evolving regulatory and financial-sector environment. |
| Egypt | Egypt comprises a large-scale GEFF facilities in a less advanced transition context, with €496 million in GET Finance and 9 participating PFIs, supported by material donor support (6% TC intensity) and a significant incentives component (5%), allowing analysis of how donor resources operate at scale in a less mature market setting. |

3.4. Methods

52. **The evaluation will apply a mixed-methods design, combining qualitative and quantitative approaches (Figure 7).** Evidence from different sources will be systematically cross-checked and triangulated to enhance the robustness and reliability of findings. The data collection and analysis methods are aligned with the evaluation matrix (Annex 1) to ensure that each evaluation question is addressed with appropriate evidence. In line with IEvD standards, the evaluation team will use internal and external evidence on a needs basis and will crosscheck findings across multiple sources to enhance credibility and reduce single source bias.

Figure 7: Mixed-methods design



Source: IEvD

3.4.1. Documentation review

53. **The evaluation team will undertake a structured documentation review to establish the core factual evidence base for the evaluation.** This review will underpin the reconstruction of GEFF’s intervention logic and the articulation of plausible causal mechanisms. Specifically, the documentation review will be used to:

- verify programme design features, funding and delivery models, and intended outcomes;
- compile and synthesise reported outputs and results;
- identify data gaps, inconsistencies, and questions to be followed up through semi-structured interviews and the survey; and

- inform the development of ex post Theories of Change for the selected case studies.

Table 3: Indicative documents

| Documentation Cluster | Indicative documents | How the evaluation team will use the evidence |
|--|--|--|
| Project documentation (sub-operations and facilities) | Board approval documents; operational documentation; facility agreements and design notes; policy statements; credit terms with PFIs | Confirm stated objectives, target segments, instrument mix, and implementation arrangements; establish the intended delivery model and accountability lines. |
| Donor and concessional finance related documents | Donor agreements; TC/incentive/grant arrangements; conditions, reporting requirements, and disbursement rules | Characterise the donor model (including intensity and modality of support); identify intended barriers to be addressed and the implied logic for concessionality and leverage. |
| Monitoring, results, and progress reporting | Credit, TIMS, PMM, ESD documentation; operational tracking reports; internal monitoring data, scorecards; facility progress reports; GEFF MIS outputs (sub-loan data, incentives, eligibility, verification); semi-annual/annual donor reports; consultant progress reports and deliverables | Verify reported portfolio outputs and outcomes (e.g., sub-loan volumes, uptake, environmental results); assess the origination pipeline and implementation constraints; appraise MRV processes and data quality; review capacity-building outputs and delivery issues. |
| Market diagnostics and contextual evidence | Market assessments; country strategies and diagnostics; policy notes | Identify binding constraints (e.g., affordability, risk, capacity) and assess whether the instrument mix and support package are aligned with these constraints in different contexts. |

3.4.2. Semi-structured interviews (Internal & External)

54. **The evaluation team will conduct semi structured interviews to complement documentary evidence, fill critical gaps, test emerging hypotheses, and understand implementation dynamics that are not fully captured in reporting.** Interviews will also support interpretation of quantitative results and strengthen causal reasoning (including the plausibility of contribution pathways).

55. **Interview guides will be tailored by stakeholder type and mapped to the evaluation questions.** The evaluation team will triangulate interview findings against documentary and portfolio evidence, and will treat perceptions as evidence to be corroborated rather than as standalone proof.

Table 4: Stakeholder groups (indicative)

| Stakeholder groups | Stakeholders (indicative) |
|---|---|
| Internal stakeholders (EBRD / programme delivery and oversight) may include, as relevant: | GEFF programme management and operational teams (FI and CSD teams) |
| | Other banking teams involved in origination and supervision (RO bankers) |
| | Technical teams supporting eligibility, and MRV processes (ESD) |
| | Donor management / grants administration and reporting functions (FI Donor Management and Donor Partnerships) |
| | Relevant sector, climate, and policy teams involved in strategic alignment |
| External stakeholders (implementation ecosystem and system-level perspectives) may include, as relevant: | Partner Financial Institutions (PFIs): management, sustainability/green finance teams, risk, and reporting functions (where applicable) |
| | End-borrowers, and technology suppliers/vendors |
| | Implementation and Verification Consultants |
| | Other MDBs, DFIs and co-financiers (where applicable) |
| | Donors and partner institutions supporting concessional finance and technical cooperation |
| | Regulators, banking associations, or market actors who can comment on institutionalisation and broader trends |

3.4.3. Survey

56. **The evaluation team will carry out a structured survey targeting Partner Financial Institutions (PFIs) involved in the GEFF programme over the evaluation period.** Survey implementation will be coordinated with the GCF-GEFF evaluation survey, with a view to ensuring complementarity, minimising respondent burden, and identifying opportunities for alignment where this is methodologically appropriate.

57. The value-added of the survey lies in assessing the extent to which green financing practices under the GEFF programme have been institutionalised within partner financial institutions in a consistent and comparable manner. While semi-structured interviews are well suited to exploring causal narratives, they do not readily allow for systematic comparison across PFIs or aggregation of evidence on embedded processes, governance arrangements, and staff capabilities. The survey will therefore focus primarily on EQ2-related dimensions, such as the integration of green finance into credit and risk processes, governance and accountability structures, staff training and retention, and continued use of GEFF tools without external consultant support, where standardised responses across institutions materially strengthen the robustness of findings.

58. In this context, the survey is intended to complement – not duplicate– interviews and document review by providing structured, comparable evidence across a larger number of PFIs and facilities. It will enable the evaluation team to test whether patterns observed in selected interviews (e.g. claims of institutionalisation, independence from consultants, or changes in internal processes) are representative across the broader GEFF portfolio, or whether they are confined to specific facility types, countries, or donor models. This cross-facility comparability is essential for drawing credible programme-level conclusions on sustainability and institutional embedding.

59. The survey will be tightly scoped, targeted, and proportionate, focusing on a select number of respondents per PFI with direct operational knowledge of GEFF implementation (e.g. green finance/product owners, risk or reporting focal points). It is not intended to generate new quantitative portfolio data for EQ1, nor to substitute for document review and interviews under EQ3, but rather to provide structured validation of institutionalisation that cannot be reliably inferred from monitoring systems alone. Survey design will be streamlined, aligned directly with the evaluation matrix, and used selectively where it demonstrably strengthens triangulation and reduces reliance on anecdotal evidence.

3.4.4. Portfolio analysis and analysis of banks' public disclosures

60. The evaluation team will integrate internal portfolio datasets with external validation sources to support robust outcome measurement and structured comparison across donor models and intensities. Quantitative analysis will be used to describe uptake and portfolio characteristics, test patterns consistent with the Theory of Change, and identify differences across facility types and contexts. Qualitative evidence from documents, interviews, and the survey will be used to interpret results and assess plausibility of contribution pathways.

61. To strengthen external validity, particularly for system level change and institutionalisation, the evaluation team will not rely on public disclosures alone (which are likely to be limited) and will therefore review available published materials and request internal data from PFIs to identify observable signals beyond internal reporting.

62. Where feasible, the evaluation team will apply structured content extraction (LLM based web-scraping) to identify convergence in terminology and practices (e.g., eligibility approaches, taxonomy references, risk frameworks, and governance arrangements). These findings will be triangulated with interview evidence (e.g., from regulators, associations, and where feasible non-GEFF banks) to reduce

the risk of misattributing disclosure trends driven primarily by external regulatory or market-wide changes.

3.4.5. Country case studies

63. The evaluation will apply a dual lens, combining programme/facility-level analysis with country/system-level assessment where evidence permits. Given the geographical distribution of GEFF facilities, IEvD will not attempt to assess market and system-wide effects across all programme regions through in-depth country work. Instead, the evaluation will use three country case studies selected purposively to reflect differences in transition classification, donor engagement, and market coverage. These case studies are designed as an additional layer on top of the four evidence sources in the mixed-methods design; they do not constitute the geographic scope of the evaluation.

64. The articulation between the programme-level perspective (portfolio-wide synthesis) and the country perspective (country-level triangulation) will be as follows. First, the evaluation team will build a programme-level evidence base through documentation review, semi-structured interviews, survey evidence, and portfolio/disclosure analysis, aligned with the evaluation matrix and triangulated to reduce single-source bias. Second, the country cases will use the same sources to reconstruct and test the country-specific contribution pathway, examining how the GEFF operating model, delivery roles (PFIs, consultants, and EBRD teams), and donor support models interact with market constraints and enabling conditions. Third, country evidence will be used to interpret programme-level patterns, explain variation across contexts, and assess the plausibility of system-level change mechanisms.

65. IEvD will develop ex post Theories of Change for each country during the desk-based phase, drawing on project documentation, relevant strategic documents and discussions with colleagues to clarify anticipated causal mechanisms. This ensures the evaluation captures heterogeneity across the GEFF portfolio and produces lessons relevant to both more advanced and less advanced transition contexts, including on how donor engagement and leverage mechanisms influence uptake, institutionalisation and sustainability.

3.5. Limitations

66. The evaluation team anticipates the following limitations. For each limitation, the evaluation team clarifies its implications for the analysis and outlines mitigation measures through design choices, triangulation, and transparent reporting.

Table 5: Limitations

| Potential Limitation | Likelihood | Impact | Why it matters for this evaluation | Mitigation |
|---|-----------------------|---------------|--|--|
| Data availability, completeness, and consistency across systems | <i>Almost certain</i> | <i>High</i> | The evaluation will rely substantially on internal monitoring systems and reporting (e.g., portfolio datasets, consultant deliverables, and donor reporting). These sources may be incomplete, use different definitions across facilities/countries, or vary in update frequency and quality, particularly for sub-loan level data, incentive utilisation, and verification status. The team also notes that existing Bank-wide monitoring approaches used for green finance limited in capturing system-level change and reflect “use-of-proceeds” accounting rather than institutionalisation outcomes. | The evaluation team will: (i) apply structured data cleaning and consistency checks; (ii) triangulate reported figures across different systems and reports; and (iii) use carefully defined proxy indicators where direct measures are not available, while clearly stating associated limitations. |
| Attribution and counterfactual constraints for system-level change | <i>Likely</i> | <i>Medium</i> | Assessing “greening of financial systems” and institutionalisation outcomes raises inherent attribution challenges: observed changes in bank practices, product offerings, or disclosures may be influenced by broader regulatory developments, market trends, and parallel donor programmes. This limits the evaluation’s ability to make strong causal | The evaluation team will apply contribution analysis logic (rather than strict attribution), assess plausibility of causal pathways using ex post Theories of Change, and triangulate evidence from document review, interviews, and external signals. |

| Potential Limitation | Likelihood | Impact | Why it matters for this evaluation | Mitigation |
|---|-----------------|------------|--|---|
| | | | attribution claims solely on the basis of observed trends. | |
| Interview and survey response bias / uneven stakeholder access | <i>Possible</i> | <i>Low</i> | Semi-structured interviews and surveys may be subject to response bias (e.g., strategic responses, or over-representation of more engaged stakeholders). Access constraints; time availability of PFIs, consultants, donors, and regulators, may also limit coverage. | The evaluation team will: (i) use standardised interview guides aligned with evaluation questions; (ii) seek balanced coverage across stakeholder types and facility models; (iii) verify perception-based evidence with qualitative and quantitative data; and (iv) report transparently on achieved interview sample sizes. |
| Limitations of public disclosure analysis as an external validation source | <i>Possible</i> | <i>Low</i> | Analysis of banks' public disclosures can strengthen external validity but has limitations. Disclosures may be influenced by regulatory compliance cycles, evolving reporting standards, and reputational incentives; they may also differ widely in depth, terminology, and comparability across markets. This can limit the strength of inferences about GEFF-specific institutionalisation. | The evaluation team will treat disclosure review as supporting evidence, apply structured extraction methods to improve consistency, and triangulate observed disclosure patterns with interviews to reduce misattribution to GEFF where broader drivers are dominant. |

4. Evaluation team and timeline

67. The evaluation team is led by Bilgehan Kayalar, Principal II Evaluation Manager at IEvD, and includes Alper Dincer, Principal II Evaluation Manager; Theo Sands, Associate Director, Senior Evaluation Manager; Piril Ozgercin and Nikolina Balta, Associates; with support from Martin Schunk, Analyst, who will support web scraping and analysis. The team will also be supported by a consultant with extensive experience in sustainable finance, ranging from policy development to the supervision of financial institutions to advance the green finance market. Samer Hachem, Director of Sector, Country and Project Evaluations will provide overall guidance on the evaluation, in close coordination with the Chief Evaluator. The internal peer reviewer is Oskar Andruszkiewicz, Associate Director, Senior Evaluation Manager. An independent external peer reviewer will be identified at a later stage.

68. The key management counterparts for this evaluation are the Financial Institutions (FI) and the Climate Strategy and Delivery Department (CSD) at EBRD. Within FI, the primary focal points will be the Head of FI Operations & Portfolio. Within CSD, the relevant counterpart will be Director, Green Financial Systems.

69. Given their role across GEFF processes – such as verifying the GET ratio, and eligible green technologies, and assessing Annual Environmental and Social Reports – the Environment and Sustainability Department (ESD) is also a key management counterpart. The IEvD team will additionally engage with its focal points in the Impact Department, which oversees the impact methodology for Green TQ.

70. Finally, considering the extensive concessionality of certain GEFF programmes, the team will consult with relevant groups across Banking and Donor Partnerships to ensure comprehensive coverage of financial and donor-related aspects.

71. The indicated timeline and dissemination plan for the evaluation is as follows (Table 6):

Table 6: Evaluation timeline

| Milestone | Delivery Date |
|--|-------------------|
| Evaluation kick-off and conceptualisation meeting | November 2025 |
| Approach paper finalised | March 2026 |
| Consultants recruited | March 2026 |
| Desk-based analysis: data collection, documentation review, and portfolio review completed | April 2026 |
| Field work: internal and external interviews completed | May 2026 |

| Milestone | Delivery Date |
|---|-----------------------------|
| Draft evaluation report circulated to peer reviewers | August 2026 |
| Draft report cleared by Chief Evaluator | September 2026 |
| Draft evaluation distributed to Management | October 2026 |
| Evaluation note (Türkiye Case Study) | October 2026 |
| Final report circulated and presented to the ARC | November 2026 |
| External publication of the report | December 2026 |
| Communication of evaluation results across networks and through social media | January 2027 onwards |

72. **The main deliverable from this evaluation will be an interim evaluation note on Türkiye case study, and the main evaluation report circa 35 pages long document including insights, key findings, and recommendations.** This evaluation will include some dissemination deliverables targeted at various internal and external stakeholders.

73. **First Output (October 2026): Evaluation note – Türkiye case study (COP31-facing).** This note will take the form of a Türkiye country case study, prepared specifically to support the Bank's positioning and learning ahead of COP31 in Antalya, Türkiye (9–20 November 2026). The note will be shared with Management for comment, recognising that findings are preliminary and will be validated and expanded in the final evaluation report.

74. **Second Evaluation Output (November 2026):** Final GEFF evaluation report. The final report will provide the comprehensive assessment of GEFF's performance, results and impacts, incorporating deeper portfolio and outcome analysis and the full set of country case studies. It will be delivered through the usual IEvD process and will be designed to inform strategic decision-making on GEFF's next iteration (e.g., operating model, donor engagement, and scalability in differing transition contexts).

End of the document

ANNEXES

Annex 1. Evaluation Matrix

| OECD-DAC criteria | Evaluation Questions | Judgement criteria | Indicators | Methods and Sources of Data |
|-----------------------------|---|---|--|--|
| IMPACT EFFECTIVENESS | EQ1: To what extent has GEFF programme expanded access to green finance and supported the greening of local financial systems? | <i>1.1 GEFF programme increase the volume and share of green finance in PFIs' portfolios.</i> | <ul style="list-style-type: none"> ▪ Total volume and number of GEFF-supported sub-loans by year and country. ▪ Share of green lending in total lending portfolio of PFIs (before vs during/after GEFF). ▪ Growth rate of green lending vs overall lending. ▪ Mapping of key green credit lines available in the country (apart from GEFF) | <ul style="list-style-type: none"> ▪ Documentation review: Board approval/operational documents; facility agreements/design notes; donor agreements & reporting; facility progress reports; IVC deliverables; internal monitoring data/ scorecards; GEFF MIS outputs (sub-loan, eligibility/verification, incentives); relevant TIMS/PMM/ESD documentation ▪ Portfolio analysis: GEFF MIS (sub-loan volumes/results) + internal monitoring data extracts; PFI credit portfolio (baseline vs during/after GEFF) and key portfolio splits where available. ▪ Survey: structured survey to validate portfolio changes and attribution pathways. ▪ Semi-structured interviews: PFIs (product/green finance, risk/credit, reporting); EBRD FI/CSD/ESD; FI Donor Management/Donor Partnerships, Operation Leaders. ▪ Country case studies. |

| OECD-DAC criteria | Evaluation Questions | Judgement criteria | Indicators | Methods and Sources of Data |
|-------------------|----------------------|--|---|--|
| | | <p>1.2 Access to green finance is expanded to targeted client groups (e.g. SMEs, households, specific sectors/regions)</p> | <ul style="list-style-type: none"> ▪ Growth in green lending portfolios of PFIs in GEFFs (volume, number of loans, share of total portfolio). ▪ Share of GEFF sub-loans to priority client groups identified (e.g. MSMEs, corporates and, households). ▪ Number of new PFIs and new client segments/sectors reached through GEFFs. | <ul style="list-style-type: none"> ▪ Documentation review: facility design notes; country strategies/diagnostics; market assessments/baselines; framework documentation/policy statements specifying target segments and eligibility; donor reporting; IVC reports; GEFF MIS extracts for sub-loan segment fields and use-of-proceeds. ▪ Portfolio analysis: sub-loan distribution by client group/sector/region (GEFF MIS) + PFI portfolio segmentation (where accessible). ▪ Survey: standardised questions on outreach, new segments, product design, and barriers. ▪ Semi-structured interviews: PFIs (management, green finance/product, risk/credit, reporting); EBRD FI/CSD; IVCs (pipeline/eligibility bottlenecks). ▪ Country case studies. |
| | | <p>1.3 GEFF programme contribute to the greening of local financial systems beyond direct PFI beneficiaries.</p> | <ul style="list-style-type: none"> ▪ Number of non-GEFF financial institutions started offering green products during GEFF programme implementation at the country-level. ▪ Introduction and replication of green products by PFIs (including products not directly supported by GEFF TC). | <ul style="list-style-type: none"> ▪ Portfolio analysis: Orbis/Bankscope (BvD) system-wide bank data to characterise sectoral lending patterns and compare GEFF PFIs vs non-GEFF banks (where feasible). ▪ Public disclosures analysis (supplementary): review of banks' public disclosures (transition plans, sustainability reports, Pillar 3 climate risk reports, TCFD/ISSB IFRS S1 & S2); structured extraction / LLM-assisted web-scraping (where feasible) to detect observable signals (governance, risk frameworks, |

| OECD-DAC criteria | Evaluation Questions | Judgement criteria | Indicators | Methods and Sources of Data |
|-------------------------------|--|--|---|---|
| | | | <ul style="list-style-type: none"> ▪ Evidence of replication or scaling by market peers/evidence that non-participating FIs develop similar green products following GEFF roll-out at the country-level. ▪ Adoption of green lending guidelines, changes in organisational structure or disclosure practices by PFIs, regulators and banking associations where EBRD has policy dialogue as part of GEFF programme. | <p>product offerings, taxonomy/eligibility language convergence).</p> <ul style="list-style-type: none"> ▪ Documentation review: policy dialogue outputs; regulatory documents; central bank/regulator publications; banking association guidelines; relevant EBRD Green Finance Academy/training/outreach data. ▪ Semi-structured interviews: regulators, banking associations, donors/IFIs, PFIs, and (where feasible) non-GEFF banks to triangulate diffusion/institutionalisation and control for regulatory/market-wide drivers. ▪ Survey: questions on replication, market signalling, and broader adoption (validated against disclosures/interviews). ▪ Country case studies. |
| SUSTAINABILITY, IMPACT | EQ2: Are GEFF programme-supported green products and lending volumes sustained once funded instruments and subsidies end, and to what extent have PFIs institutionalised green finance capabilities | <i>2.1 PFIs continue and scale green lending after funded instruments and incentive schemes end.</i> | <ul style="list-style-type: none"> ▪ Existence and active marketing of green products introduced under GEFF, two to three years after the last disbursement or incentive payment. ▪ Trend in green lending volumes and share of portfolio post-GEFF programme (growing, stable, declining). | <ul style="list-style-type: none"> ▪ Documentation review: facility closing/disbursement timelines; donor/incentive rules; progress and donor reports; internal monitoring data/ scorecards; IVC deliverables; any ex-post facility monitoring notes. Public materials (as available): product pages/marketing materials and public reports. ▪ Portfolio analysis: trends in green lending volumes/shares post-GEFF using PFI portfolio data (baseline vs during/after; post-end period) |

| OECD-DAC criteria | Evaluation Questions | Judgement criteria | Indicators | Methods and Sources of Data |
|-------------------|--------------------------------------|--|--|---|
| | <i>within their core operations?</i> | | <ul style="list-style-type: none"> ▪ Share of green lending financed from PFI own balance sheet or commercial sources vs IFI/donor lines. | <ul style="list-style-type: none"> ▪ Survey: continued product marketing, funding sources, pipeline, and financing mix (own balance sheet vs IFI/donor). ▪ Semi-structured interviews: PFIs (management/product/risk/reporting) to validate sustainability claims and financing substitution; |
| | | <i>2.2 GEFF programme improve PFIs' processes and risk management for green lending.</i> | <ul style="list-style-type: none"> ▪ Integration of environmental/climate risk criteria into credit appraisal and risk systems. ▪ Time and cost of processing green loans vs conventional loans. ▪ NPL ratios of green portfolio vs overall portfolio (before vs during/after GEFF programme) | <ul style="list-style-type: none"> ▪ Documentation review: PFI credit manuals and risk guidelines (where available and shared); MRV/eligibility process documentation; IVC reports on appraisal/verification; relevant TIMS/PMM/ESD documentation. ▪ Portfolio analysis: PFI key financial indicators (incl. NPL ratios where accessible), processing time/cost proxies where data exist, green vs overall portfolio performance trends (triangulated, acknowledging comparability limits). ▪ Survey: process changes, costs/time, risk tools adoption, perceived efficiency gains. ▪ Semi-structured interviews: PFI risk/credit staff + reporting/IT/MIS focal points to validate policy/process changes and constraints. |
| | | <i>2.3 Green finance is embedded in PFIs' policies, procedures and governance.</i> | <ul style="list-style-type: none"> ▪ Integration of GEFF eligibility criteria, technology lists and screening tools into standard credit appraisal and risk systems. ▪ Presence of formal green/ESG/climate policies | <ul style="list-style-type: none"> ▪ Documentation review: PFI green finance policies; governance documents/committee terms; integration of GEFF eligibility criteria/technology lists/screening tools into standard procedures (where accessible). ▪ Survey: formalisation of governance, policy adoption, and integration into standard appraisal flows. |

| OECD-DAC criteria | Evaluation Questions | Judgement criteria | Indicators | Methods and Sources of Data |
|----------------------------------|---|--|---|--|
| | | | approved by PFI governance following GEFF support. | <ul style="list-style-type: none"> ▪ Semi-structured interviews: PFIs (risk, sustainability/green finance, IT/MIS) to validate institutionalisation and actual use (triangulated against documents). ▪ Public disclosures (where relevant): sustainability/TCFD/ISSB reports for validation of governance and policy statements. |
| | | <i>2.4 PFIs retain and further develop internal technical capacity for green finance.</i> | <ul style="list-style-type: none"> ▪ Number and proportion of staff trained in green finance who remain in relevant positions. ▪ Frequency and quality of refresher trainings or onboarding modules on green products. - Use of tools (e.g. technology selector, screening checklists) without external consultant support. | <ul style="list-style-type: none"> ▪ Documentation review: training records/HR data (where available); Green Finance Academy / TC training outputs; IVC deliverables relating to capacity building, tools, and handover. ▪ Survey: training coverage, retention, and continued use of tools without external support. ▪ Semi-structured interviews: loan officers, credit analysts, specialists, product owners to assess capability retention and practical application (triangulated). |
| EFFICIENCY, EFFECTIVENESS | EQ3: How effective and efficient are different donor funding models and levels of concessionality within GEFF programme? | <i>3.1 Donor funding models and levels of concessionality are aligned with market barriers and country/sector needs.</i> | <ul style="list-style-type: none"> ▪ Clear linkage between identified market failures (e.g. affordability, risk perception, capacity gaps) and the chosen blend of instruments (TC, investment grants, interest rate incentives, guarantees). | <ul style="list-style-type: none"> ▪ Documentation review: market assessments/baselines; country diagnostics; donor funding agreements and disbursement rules; facility design notes and instrument rationale (TC, grants, incentives, guarantees); policy statements and policy dialogue documentation where relevant. ▪ Portfolio analysis: uptake and performance patterns across facilities/countries by donor model/intensity using GEFF MIS + internal monitoring data extracts . |

| OECD-DAC criteria | Evaluation Questions | Judgement criteria | Indicators | Methods and Sources of Data |
|-------------------|----------------------|---|---|---|
| | | | <ul style="list-style-type: none"> Differences in uptake/impact across countries/segments with different funding models. | <p>Additionality assessments / portfolio mapping: sub-operation/facility-level additionality analysis including instrument-blend mapping against identified barriers (documented and triangulated).</p> <ul style="list-style-type: none"> Semi-structured interviews: donors, PFIs, EBRD Donor Partnerships/FI Donor Management, CSD, and relevant operational leads to test alignment logic and implementation feasibility. |
| | | <p>3.2 Donor resources generate strong financial and non-financial additionality.</p> | <ul style="list-style-type: none"> Leverage ratio: private finance mobilised per unit of donor concessional finance. Share of financed projects assessed as “would not have happened / would have been smaller ticket size” without EBRD GEFF programme. Instances of innovation enabled (new technologies, client segments, riskier sectors). | <ul style="list-style-type: none"> Documentation review: donor agreements; reporting requirements; market assessments; facility progress/donor reports; project/facility additionality narratives. Portfolio analysis: leverage calculations using GEFF MIS / facility monitoring and donor funding data (with assumptions clearly stated); comparative patterns by instrument blend. Additionality assessments: project/facility-level additionality analysis (incl. counterfactual plausibility statements “would not have happened / would have been smaller”). Semi-structured interviews: donors, PFIs, FI regional heads/GFS regional head, Donor Partnerships, operation/portfolio leaders to confirm and validate innovation instances and causal contribution. |

Annex 2. Country case selection

Table 7: Portfolio screening of GEFF Facilities at country-level for country case selection (aggregated EBRD GET finance and donor funding intensity).

| GEFF Facility (country-level) ^{14,15} | Country Group | Advanced/Less Advanced Transition ¹⁶ | EBRD GET Finance (€ million) | Total TC (€ million) | Total non-TC (€ million) | Total Donor Funds (Grants) (€ million) | Grants Intensity (%) | Number of PFIs |
|--|------------------------------------|---|------------------------------|----------------------|--------------------------|--|----------------------|----------------|
| Türkiye | Türkiye | Advanced | 1,110.85 | 13.08 | 0.00 | 13.08 | 1% | 18 |
| Egypt | Southern and Eastern Mediterranean | Less Advanced | 496.02 | 14.82 | 27.86 | 42.68 | 9% | 9 |
| Poland | Central Europe and Baltics | Advanced | 408.62 | 2.33 | 0.00 | 2.33 | 1% | 6 |
| Morocco | Southern and Eastern Mediterranean | Less Advanced | 234.21 | 8.42 | 31.15 | 39.57 | 17% | 6 |
| Georgia | Eastern Europe and Caucasus | Less Advanced | 125.42 | 3.57 | 0.00 | 3.57 | 3% | 4 |
| Mongolia | Central Asia | Less Advanced | 84.34 | 7.23 | 0.00 | 7.23 | 9% | 2 |
| Lebanon | Southern and Eastern Mediterranean | Less Advanced | 78.59 | 2.73 | 0.00 | 2.73 | 3% | 1 |
| Uzbekistan | Central Asia | Less Advanced | 77.85 | 4.35 | 3.32 | 7.67 | 10% | 5 |
| Romania | South-Eastern Europe | Advanced | 76.96 | 1.37 | 0.00 | 1.37 | 2% | 3 |
| North Macedonia | South-Eastern Europe | Less Advanced | 75.50 | 4.26 | 11.85 | 16.11 | 21% | 5 |

¹⁴ Sub-operations of GEFF Facilities (including some SEFF and Energy Efficiency facilities) Board Approved during the 2016–2024 period, at signed, completed, and repaying stages.

¹⁵ The initial portfolio screening grouped countries and regional clusters by two principles: ensuring transition diversity by including both advanced and less advanced countries to capture differences in market development and regulatory maturity and applying portfolio-level differentiation based on three dimensions; (1) grant intensity (extent of TC and Non-TC grants), (2) facility scale (EBRD Finance amount). For countries with multiple GEFF facilities, metrics reflect aggregated performance.

¹⁶ EBRD SCF 2026-30 – Annex (by average ATQ ranking)

Evaluation of the EBRD's Green Economy Financing Facility (GEFF): Results and impact (2016-24)

| GEFF Facility (country-level) ¹⁴¹⁵ | Country Group | Advanced/Less Advanced Transition ¹⁶ | EBRD GET Finance (€ million) | Total TC (€ million) | Total non-TC (€ million) | Total Donor Funds (Grants) (€ million) | Grants Intensity (%) | Number of PFIs |
|---|------------------------------------|---|------------------------------|----------------------|--------------------------|--|----------------------|----------------|
| Kazakhstan | Central Asia | Less Advanced | 74.07 | 2.14 | 3.02 | 5.16 | 7% | 3 |
| Serbia | South-Eastern Europe | Less Advanced | 67.89 | 2.87 | 8.49 | 11.36 | 17% | 7 |
| Bosnia And Herzegovina | South-Eastern Europe | Less Advanced | 44.00 | 2.30 | 8.88 | 11.17 | 25% | 9 |
| Kyrgyz Republic | Central Asia | Less Advanced | 37.69 | 3.28 | 4.74 | 8.02 | 21% | 6 |
| Kosovo | South-Eastern Europe | Less Advanced | 33.00 | 2.05 | 6.86 | 8.91 | 27% | 8 |
| Armenia | Eastern Europe and Caucasus | Less Advanced | 32.36 | 3.75 | 5.68 | 9.43 | 29% | 6 |
| Jordan | Southern and Eastern Mediterranean | Less Advanced | 28.93 | 2.86 | 4.39 | 7.25 | 25% | 5 |
| Tajikistan | Central Asia | Less Advanced | 22.04 | 3.15 | 5.00 | 8.15 | 37% | 6 |
| Albania | South-Eastern Europe | Less Advanced | 11.00 | 0.64 | 2.87 | 3.51 | 32% | 5 |
| Bulgaria | South-Eastern Europe | Advanced | 10.00 | 0.00 | 0.00 | 0.00 | 0% | 2 |
| Moldova | Eastern Europe and Caucasus | Less Advanced | 3.75 | 0.14 | 0.00 | 0.14 | 4% | 1 |
| Montenegro | South-Eastern Europe | Less Advanced | 2.00 | 0.12 | 0.41 | 0.53 | 26% | 2 |

Annex 3. What is systemic change?

75. Systemic change refers to fundamental changes to structures, behaviours, or relationships by market participants. Driving systemic change often involves changing the underlying roles, norms, structures, and incentives within a market system rather than focusing on the outputs from an individual project. There can be a substantial time lag between project delivery and systemic changes, which creates challenges both with respect for monitoring and evaluating whether interventions have contributed towards systemic changes. Systemic changes are difficult to measure and attribute, given the complexity of market systems, the wide range of actors, the context-specific factors, and the long timeframes that can be needed for them to materialise. As a result, monitoring frameworks frequently do not collect data on how projects have contributed towards systemic change.

76. Development organisations focus on systemic change for two principal reasons: scale and sustainability. Through catalysing systemic change, development finance institutions (DFIs) can effectively leverage and scale up the impact from their own financing. Systemic change can also improve the sustainability of results by changing norms, behaviours, and relationships to embed results rather than relying upon temporary development or concessional financing.

77. IEvD's evaluation synthesis of the EBRD's approach to transition impact (TI)¹⁷, provides a comprehensive overview of how systemic change is treated under the Bank's current TI monitoring systems, and the interrelation between systemic change and project-level outcomes.

¹⁷ [The long journey of the EBRD's Transition Impact: Evaluation Synthesis of the EBRD's approach to Transition Impact \(2017-23\)](#)

Annex 4. Previous evaluation work related to Green Financial Systems

Special Study on the IEvD evaluation of the EBRD's Sustainable Energy Finance Facilities (2015); SS14-080

78. Since 2004, the EBRD has supported the development of energy efficiency and renewable energy financing markets through Sustainable Energy Finance Facilities (SEFFs). These facilities have channelled credit lines via Partner Financial Intermediaries (PFIs), complemented by grant-funded technical assistance and, in many cases, incentive payments to end beneficiaries such as SMEs and households. The approach aimed to address four major market barriers, financial, technical, awareness, and legal, to foster sustainable energy investment. Between 2004 and 2013, 27 SEFFs (including extensions) were approved across 20 countries. While most projects (93%) were in the residential sector, the industrial sector received the bulk of funding (85%), with residential accounting for 12% and municipal projects only 2%.

79. This special study by the Evaluation Department reviewed the design, implementation, and impact of SEFFs over the period, providing an aggregate view of their evolution, scope, and alignment with regional energy markets and EBRD's strategic framework. Rather than rating individual facilities, the study focused on extracting lessons and operational recommendations to inform future SEFF design and enhance institutional learning.

Main findings

80. The evaluation revealed significant achievements and challenges:

Design –

- SEFF objectives were found to be consistent with EBRD sector policies and strategic frameworks. SEFFs have been shaped by EBRD's policies and strategies and in turn these have been informed by SEFF experience. The use and targeting of incentive payments within SEFFs has followed the EBRD's principles and criteria, contributing in some cases to changing behaviour patterns and lowering the start-up costs for financial intermediaries targeting lending products at small businesses.
- SEFF objectives were found to be consistent with the needs of the countries. Each SEFF is informed by a market demand study and may be influenced by other factors such as donor priorities. But while SEFF designs have generally been consistent with the barriers identified in those market studies, there are some inconsistencies in the extent to which the logical connections between market barriers and the specific SEFF features chosen are stated in Board documents.
- The EBRD tracks SEFF objectives against quantitative targets or 'transition impact monitoring benchmarks' set at the design stage. Overall EBRD has been flexible in setting the targets to local circumstances. However, some benchmarks were based on assumptions of allocation

and carbon emission factors that can lead to difficulties in achieving targets if assumptions are shown to be imperfect or market conditions change. There is a tacit intervention logic for SEFFs that is generally understood, but there has been little consistency in how this intervention logic has been translated into relevant performance indicators. As a consequence, the choice of benchmarks has varied widely between SEFFs without any clearly stated rationale. There has also been a tendency to adopt benchmarks relating to the long-term impact of creating a self-sustaining market for energy efficiency and renewable energy financing, but at present there is no mechanism for continuing to monitor these indicators once a SEFF has finished.

- Key success factors were identified as the effectiveness of project consultants; simple procedures and fast credit decision making process; commitment of the PFIs; bundling of loan funds with donor-funded TC and (in some cases) incentive payments and 'smart' incentives linked to energy savings or CO2 reductions to deliver higher standards. There is evidence of an evolution in SEFF design based on good practices informed by lessons, but these lessons are not well documented in project or strategic documents.

Implementation –

- At the implementation level, SEFFs were found successful in achieving their financial and technical benchmarks, with TC playing a major role in achieving these results. Based on case studies and previous evaluations, the achievement of quantitative objectives is considered very good, with completed SEFFs achieving almost all of their targets and even exceeding in some cases.
- Regarding effectiveness of technical cooperation, there is a strong consensus among the main stakeholders that the project consultants were critical to the achievement of objectives. The main added value of TC was in raising the awareness of environmental, social and safety issues in PFIs, and in exposing them to the opportunities offered by a new market segment. Although the TC provided has been effective and highly valued, some PFIs felt that when the SEFF comes to an end, they might lack sufficient capabilities to continue sustainable energy lending without the technical support of the project consultants
- Where incentive payments have been used, these were found to be appropriate for overcoming specific types of market barriers and the levels at which incentives were set have been as low as possible while still retaining efficacy. They can focus attention and motivate action where the level of prioritisation given to sustainable energy investments is low even though such investments are cost-effective. Incentives also encourage the use of higher standards or better performing technologies, hence leading to more substantial 'deeper' interventions. There has been a clear trend of increasing "smartness" in incentives to sub-borrowers (i.e. linking to quantitative aspects of project performance) and phasing out PFI incentives in countries where there has been a succession of facilities.
- The efficiency of SEFF management has been good and EBRD reporting requirements were not found to be overly burdensome. The management of SEFFs has benefited from over 10 years of learning experience and can be considered as best-practice for an initiative operating in such a wide geographical area. The lack of a uniform monitoring system is an area needing

improvement though some should be seen with the launch of a new Management Information System.

Impact –

- In terms of results and transition impacts, evidence suggests that the SEFFs have had a positive impact on investment in energy efficiency and renewable energy. The main impacts appear to be increased awareness of energy efficiency and renewable energy opportunities; transfer of skills to PFIs and sponsors; demonstration effects (particularly in the residential sector); and the use of better technologies than those commonly used on the market. Where it has been a relevant objective, SEFFs have positively influenced the ability of countries to comply with EU requirements on energy policies. The impacts on institutions, laws and policies that promote market function have been successful in countries where there has been a direct policy dialogue component. Although indicators relating to direct energy and CO2 savings are a convenient way to measure the technical achievements of sub-projects, they are of secondary importance to the indicators relating to the creation of a self-sustaining market for investments.
- Policy dialogue has been an important component of the Bank's work alongside SEFFs and enhances leverage and long-term impact. There has, however, been a lack of reporting and recognition of the work done except when it is included as a transition impact benchmark. Two examples of some success are BelSEFF, where the process of drafting legal instruments key to the success of the SEFF was accelerated, and KyrSEFF, where a long process of preparatory policy dialogue between EBRD and the government in energy efficiency in buildings preceded a successful launch.
- Regarding SEFFs' sustainability, few examples exist of continued energy efficiency and renewable energy lending by PFIs beyond or outside of the SEFFs. There has been a clear trend towards a greater focus on long-term sustainability in SEFF design, such as the use of lower and more precisely targeted incentives, inclusion of policy dialogue and efforts to develop the local consultancy sector. Benchmarks relating to long-term sustainability are also becoming more widely used, such as the volume of lending from alternative non IFI sources and the number of local engineering firms receiving training. In this respect, there has been an evolution of the SEFF model towards ensuring that SEFFs leave a legacy of a strengthened project consultancy sector.

Recommendations

81. The evaluation proposed the following recommendations:

- Formalise the programmatic approach – while the success of the SEFFs led to a clear plan to replicate the SEFF model in the region, there remains a tendency to regard each facility as a stand-alone project. Formalising the SEFFs as a programmatic approach has the potential to improve consistency and efficiency in the design, implementation, monitoring and evaluation of SEFFs. Areas where a programmatic approach could yield benefits include: (a) introduction

of regular programme-level evaluation; (b) systematic use of TI benchmarks and indicators; (c) adoption of a common structure for project documentation; (d) consistent approach to TC; and (e) coordination of SEFF-wide activities. The potential should be explored to use non-transactional TC funds to support SEFF-wide activities such as the SEFF website, annual conference and success stories dissemination.

- Make explicit an intervention logic and use consistent and relevant TI benchmarks – while all SEFFs have the same long-term objective of stimulating the creation of a self-sustaining market for energy efficiency and renewable energy investments through broadly similar means, there is a lack of consistency in the indicators used to monitor performance and to link those indicators with transition impacts. A programme-wide intervention logic for SEFFs should be defined that specifies: (a) the outcomes expected from the range of typical SEFF outputs and when subsidies/incentive payments are used clarity on the objectives of these; (b) the connection between these outcomes and the desired impacts; and (c) the assumptions and risks implicit in each of the links in the intervention logic. At least some of the outcome indicators should be capable of aggregation across multiple SEFFS. Now that country strategies have results frameworks, baselines should be established, and targets set, monitored and reported at the country level. Individual SEFFs would then establish their contribution to meeting these targets.
- Broaden the benefits to the local consulting sector – consortia of consultants supporting the SEFFs have included local firms and have thereby developed the local consulting sector, although the benefits have tended to be confined to a relatively narrow group of local firms or experts. To develop a fully functioning sustainable energy market, capacity building should be broadened to encompass local firms and experts outside of the project consultants' consortium. Any subsequent phases of a facility should explore more creative uses of TC funds, such as a local consulting firm accessing SEFF TC support to originate and develop SEFF sub-projects.

Special Study on Climate Initiatives (2019); SS18-115

82. In 2019, IEvD carried out an evaluation of EBRD's Climate Initiatives, covering the Sustainable Energy Initiative (SEI), approved in 2006; the Sustainable Resource Initiative (SRI), introduced in 2013; and the Green Economy Transition (GET) initiative, approved in 2015. The review assessed the performance of the Climate Initiatives (CI) programme against its stated objectives, examining which financing and policy dialogue activities proved most effective and efficient in achieving those objectives, as well as identifying key operational constraints and risks.

Main findings

83. The evaluation revealed significant achievements and challenges:

- Programme design, objectives, and relevance – EBRD has leveraged its energy efficiency expertise to become a leading MDB in global climate action, expanded CI's scope to include climate change and adaptation, secured critical external resources, and introduced SRI for broader GET classification, though quantitative climate targets like carbon emissions avoided have been dropped.
- Key financial points – CI met all financial and TI targets with strong portfolio performance, but heavy foreign currency (FCY) exposure poses mismatch risks and potentially higher lifetime project costs.
- Metrics, evidence and data adequacy –
 - When it comes to verification and reporting, there is no systematic process for verifying forecasts or reporting actual results; monitoring relies on ex ante estimates, and while some sampling occurs, it lacks formal documentation and a structured ex post reporting system.
 - Although some departments (e.g., ESD and EPG) collect ex post data, it is fragmented and not verifiable against ex ante estimates, resulting in an inability to demonstrate tangible climate impacts or progress on adaptation beyond basic transaction counts.
 - Data systems are incomplete and definitions unclear, making it difficult to trace how metrics are constructed or assess the cost-effectiveness and impact of concessional finance across departments.
 - Additionality claims cannot be substantiated due to the absence of counterfactual analysis (e.g., control groups) and insufficient linkage between transaction targets and country-level needs, limiting the credibility of impact reporting.
- Internal incentives – While project preparation methods incentivise achieving the 40% ABI GET target and access to concessional finance, the performance management framework, staff incentives, and resourcing are not aligned with delivering actual climate mitigation or adaptation results at operational or programmatic level.
- Use of TC –

- TC funds are primarily directed to project preparation, while support for policy dialogue, capacity building, and climate strategy development has grown since SEI3. However, project-level data on TC and Non-TC finance is inconsistent, unreconcilable with DCF Annual Reports, and largely missing from systems (e.g., no TC data in TCRS since 2016; Non-TC data only from 2014).
- Renewable Energy and Industrial EE deliver nearly three times more GHG savings per EUR Non-TC than SEFFs and MEI EE, yet the latter receive disproportionate support.
- At the country level, governments lack reliable data on adaptation needs, carbon budgets, baselines, and targets, and Nationally Determined Contributions (NDCs)-aligned plans are absent. Funding for policy advice is not prioritised by expected GHG impact, and market studies/action plans often focus narrowly on EE goals without informing EBRD country reporting.

Recommendations

84. The evaluation proposed the following recommendations:

- Strengthen and clarify the broader strategic context and objectives of the climate related components of GET – the objective should be clear alignment with the Paris Agreement, using selective programmatic approaches in line with low carbon pathways and taking account of NDCs.
- Intensify private mobilisation - strengthen creditworthiness of project designs to private partners by strengthening the focus on project designs that derive acceptable risk return profiles for private sector financiers by making innovative use of unfunded and funded instruments to strengthen project risk profiles and target mobilization in total, rather than ABI.
- Strengthen institutional arrangements for concessional Climate Funds – Provide E2C2 with a mandate to manage the portfolio of concessional climate funds, with an overarching objective to mitigate climate change effects by reducing GHG emissions in its COOs and reducing vulnerability to CC; maximise potential for private co-finance to achieve this objective; and regularly report to the Board on the achievement of physical climate change objectives.
- Increase capacity to use LCY finance – direct resources to Treasury to improve foreign access to local capital markets; country strategies should assess LCY finance options and main constraints; LCY should feature specifically in country strategies and Bank Scorecards.
- Strengthen management information system – the Technical Cooperation Reporting System (TCRS) or some equivalent urgently needs to be made operational to capture project level TC data. CI databases need to be integrated, and ex ante and ex post data collected at the country and project level on variables such as COO vulnerability and carbon budgets, baselines and targets for net and gross emissions, expected lifetime emissions savings, scoring for improvements in resilience, sources of co-finance, and unit costs of outputs and outcomes.

- Management report to the Board – Management should submit a report to the Board within no more than 12 months providing a detailed discussion of implementation of these recommendations, including explicitly identifying resources, responsibilities and timelines.

Evaluation of Green Economy Transition (GET) Approach 2.1 (2025); SS25-197

85. The Green Economy Transition (GET) 2021-25 is the Bank's approach for helping EBRD's countries of operation (COOs) build green, low carbon and resilient economies. This evaluation aimed to assess the strategic design of GET 2.1, how it was operationalised, and what it has delivered to provide useful insights and recommendations for the next iteration of the strategy.

Main findings

- GET 2.1 has been a transformative success story for EBRD. Despite challenging conditions, the Bank met GET 2.1's central target: 50% of financing was green every year of the strategy's implementation, and in 2024, the EBRD went even further, with the GET ratio reaching 58%.
- The design of GET 2.1 was ambitious but lacked clear, actionable pathways and robust performance metrics to support the shift towards taking a systemic approach. Without a Theory of Change and a performance dashboard which integrated systemic components, implementation of the systemic approach endorsed within GET 2.1 was uneven.
- There was significant progress in strengthening operationalisation but poor use of data and conflation of GET and transition impact remain ongoing issues. The Green Monitoring, Reporting and Verification system (MRV) is a big step forward but will take time to deliver results. The division between GET and Green ETI remains unclear, and the methodology for green PIM, despite adopting a joint MDB agreed methodology, leads to significant overestimates.
- From a financing perspective, GET 2.1 has been successful. What is less clear is what that financing means for CO2 emission reductions or systemic change.

Recommendations

86. The IEvD made 5 recommendations:

- To improve the quality of the EBRD's green finance, the EBRD should strengthen how systemic change is embedded within the GET strategy.
- To increase the quantity of its adaptation and environmental financing, the Bank should clearly outline the challenges it has faced in these areas, articulate the role that the EBRD should play, and improve internal incentives.

- In order to improve both the quantity and quality of its green finance, the Bank's engagement in the financial sector should be centred around whether the EBRD is contributing to expanding green finance, not around use-of-proceeds.
- To improve the effectiveness and the credibility of its GET finance results, the Bank should strengthen the use of GET data to support investment decision-making, performance management and learning.
- To improve the effectiveness and the credibility of its GET finance results, the Bank should strengthen the process and methodology for estimating GET PIM, given the central role of mobilisation in both the SCF and the new GET.