We support the use of GCF grant financing to develop policies and standards (MRV, legal reform) around re-risking EE retrofits in Armenia and as incentive financing to allow poorer families affected by high heating costs to gain access to affordable finance for retrofitting their single family homes and multi-family apartment buildings. While focus group is good, the proposed interventions include switching from (inefficient) electricity heating to natural gas in public buildings again, some concerns with this. The project should avoid direct financing for what will be a lock-in of fossil-fuel approaches for another 20 years in the project area.

On gender: did not see the details of the project gender action plan, but women are supposed to be trained in MRV data collection and have recognized roles in project implementation; however, the project, while highlighting that 37% of potential beneficiaries live in female-headed households amongst the poorest households, does not seem to make any special provisions to prioritize their access to the program. Likewise, the proposed monitoring framework and indicators does not seem to provide for sex-disaggregated data collection.