FP025: Sustainable Energy Financing Facilities (SEFF) (EBRD), Multiple Countries

CSO comments on the project given as intervention during the 14^{th} GCF Board Meeting, October 2016

- In general, we welcome the fact that the GCF is looking to target significant resources to end-use energy efficiency, and that it is seeking ways to direct funding to small-to-medium sized enterprises. We also think the focus on improving the efficient use of water can be an important strategy to improve resilience. However, we also have a number of concerns regarding this proposal.
- The EBRD program intends to operate in 13 countries, but, according to the submitted proposal, 5 countries have not yet provided "no objection" letters. This should have happened before the proposal came to the Board. This goes against the spirit of country ownership.
- Category A sub-projects should be disfavored, and come back to the GCF Board for prior approval. The proposal is rated as medium risk (intermediation 2), but as a program on-lending through financial intermediaries, it is possible that a minority of sub-projects could be high risk.
- Despite very precise-seeming estimates on emissions reduction potential, only an "indicative" list of technologies is provided. A more focused list of priorities and sub-projects should be provided. In particular, it should be made explicit that the program cannot support fossil fuel power plant retrofits.
- We have some concerns about the funding of hydropower projects through the program, including as regards consultations, and would urge the prioritization of solar and wind projects in the renewable energy component of the project.
- To ensure transparency, there should be online disclosure of all sub-projects supported by the proposal (not just a selection of case studies).
- The existence of a detailed gender action plan is welcome, including the commitment to knowledge generation and distribution of "gender lessons learned." We would like to see the gender ambition improved, however -- for example, for partner financial institution staff to receive gender training and articulation of a gender approach in the partner institutions (currently only expected for 10%) should be made to ensure that gender barriers to finance for women entrepreneurs are addressed in each of the countries the SEFF is going to operate in.