

# Gender Budget Watchdog Report of Planned and Executed Funds in the Western Balkan Investment Framework



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# 1. INTRODUCTION

## 1.1. ABOUT WESTERN BALKANS INVESTMENT FRAMEWORK

The **Western Balkans Investment Framework (WBIF)** was officially launched in 2009 as a response to the region's persistent infrastructure deficit and limited capacity to finance large-scale, strategic development priorities through domestic resources alone. WBIF was designed to **coordinate multiple financiers around a single, policy-driven investment pipeline**, ensuring that scarce grant resources are used strategically to unlock much larger volumes of lending and national co-financing. In practice, WBIF functions as a **regional financial platform** that supports socio-economic development while directly contributing to the broader political objective of **advancing EU accession priorities** by aligning investments with EU policies, standards and reforms.

WBIF's strategic relevance has increased further as it has become a core delivery channel for EU policy packages in the Western Balkans. It is explicitly linked to - and used to implement - **the Connectivity Agenda, the Economic and Investment Plan (EIP), the Energy Support Package, and the Growth Plan**. The Growth Plan is underpinned by the Reform and Growth Facility, which provides additional funding and positions WBIF as an operational mechanism to support priority investments, particularly in transport, energy, digital infrastructure and human capital development.

## 1.2. WBIF STRUCTURE AND OPERATION MODEL

WBIF operates through a **blended finance architecture**. Its core added value is not a single funding stream, but an integrated financing model that makes priority projects both financeable and implementation-ready by combining:

- **EU and bilateral donor grants,**
- **loans from Partner Financial Organisations (IFIs),** and
- **national contributions** from Western Balkan beneficiaries.

This structure enables WBIF to address a central bottleneck in the region: many priority projects are politically important and economically justified, but require grant-funded preparation, improved bankability and risk reduction before IFI lending and national budgets can support implementation.

WBIF supports the six Western Balkan beneficiaries on the EU accession path: Albania, Bosnia and Herzegovina (BiH), Kosovo, Montenegro, North Macedonia and Serbia. WBIF support typically covers three complementary layers, each corresponding to a different stage or constraint in project delivery:

**a) Public-sector investment support** - WBIF supports high-priority public infrastructure investments that generate broad socio-economic value and regional connectivity. This includes rail, road and waterborne transport, clean energy investments, water and wastewater systems, education facilities, and digital connectivity infrastructure.

**b) Private-sector blending and instruments** - To strengthen competitiveness and support firm-level investment, WBIF provides private-sector support through non-repayable investment grants and repayable instruments (e.g., interest-rate subsidies, risk-sharing mechanisms and other structured finance tools), complemented by advisory services. This allows WBIF to expand access to finance and reduce investment risk for businesses, particularly MSMEs.

**c) Technical assistance (TA) and advisory support** - WBIF finances technical assistance that is essential for turning investment concepts into bankable and implementable projects. Typical support includes feasibility studies, impact assessments, designs, procurement planning and tender dossiers, as well as capacity building and advisory services (including for private-sector instruments) to ensure effective utilisation of funds and successful project delivery.

WBIF's portfolio is structured around **six intervention areas** that define both strategic priorities and the type of investments supported:

- Sustainable transport
- Clean energy
- Environment & climate
- Digital future
- Competitiveness / private sector development
- Human capital development

These priorities translate into concrete investment categories such as transport interconnections and corridors, renewable energy and grid infrastructure, energy efficiency, waste and water management, social infrastructure (health and education), digital connectivity, and financial instruments that enable private-sector investment.

A sector snapshot for **2009-2025** illustrates the scale of WBIF-supported activity (estimated total investments / WBIF contribution):

- **Sustainable transport: €19.4bn / €2.9bn**
- **Clean energy: €8.1bn / €836m**
- **Environment & climate: €4.5bn / €448.1m**
- **Human capital: €3.4bn / €127.3m**
- **Digital future: €585.5m / €53.5m**
- **Private sector: €7.3bn / €628m**

### 1.3. PARTNER ORGANISATIONS AND WHAT THEY PROVIDE

WBIF's Partner Financial Organisations co-design, co-finance and implement projects in coordination with EU resources and national contributions. The booklet identifies core IFI partners from inception as **EIB, EBRD and CEB**, with **KfW, the World Bank and AFD** joining later. More recently, **IFC and EIF** have expanded WBIF's capacity to support private-sector instruments and risk finance.

Bilateral donors provide financial contributions through the **European Western Balkans Joint Fund** and play an active role in WBIF governance and operations, including participation in the co-chairing arrangements.



FIGURE 1: WBIF actors overview

### 1.4. GOVERNANCE AND DECISION-MAKING

WBIF governance is led by **Strategic and Operational Boards, co-chaired by the European Commission and a rotating bilateral donor country**. Membership includes the European Commission, EU Member States, Norway, and Partner Financial Organisations. Several relevant regional and EU actors participate as observers, including the European Parliament, Regional Cooperation Council (RCC), Transport Community, Energy Community, and the WB6 Chambers Investment Forum.

In operational terms, Western Balkan beneficiaries prioritise projects aligned with national strategies and EU policy objectives, while partner financiers structure and deliver the blended financing packages, combining loans with grants and ensuring implementation support under a shared pipeline logic.

## 1.5. RESULTS TO DATE

WBIF has achieved a significant scale of financial mobilisation:

- **Over €4.4bn in WBIF grants mobilised,**
- Triggering **over €36.1bn** in total investments.

This scale demonstrates WBIF's core value proposition: the ability to use limited grant resources strategically to unlock substantially larger investment volumes through lending and national co-financing.

WBIF reports **€628m** in WBIF contribution to mobilise an estimated €7.3bn in private-sector investments, primarily focused on MSME finance.

Across the 2009-2025 period, WBIF highlights the following tangible delivery outcomes:

- **1,060 km of new roads** delivered,
- **187 MW of renewable energy** installed,
- **2.4 million people** gaining access to improved drinking water,
- **96,600 students** benefiting annually from better schools,
- Support to the **Digital Agenda for the Western Balkans** as a flagship regional reform and investment area.

From January 2024 to July 2025, WBIF endorsed **17 new investments** across clean energy, sustainable transport, environment, and private sector development, with a WBIF contribution of **€547.1m** and a total estimated investment volume of **€2.2bn**. The same reporting notes that **the first projects financed by the Reform and Growth Facility were approved in 2025**, signalling WBIF's evolving role as a key operational channel for the Growth Plan.

## 2. OBJECTIVES AND METHODOLOGY

### 2.1. OVERALL OBJECTIVE AND SCOPE

The core purpose of this assignment is to produce a **Gender Budget Watchdog Report** that assesses the extent to which **gender considerations are integrated into the planning, allocation, and implementation** of climate-related public funds channeled through the Western Balkans Investment Framework (WBIF) in the Western Balkans. The analysis examines how effectively the WBIF financing model embeds **gender-responsive budgeting (GRB) principles** across the full project cycle, including project identification and design, appraisal and approval, implementation, and monitoring and reporting. The study identifies gender gaps in funding priorities, access to resources, and results, and assesses the extent to which WBIF-financed climate actions contribute to gender equality and inclusive outcomes across relevant sectors. However, it is important to note that the study's **findings are necessarily constrained by limited data availability**, because access to key WBIF/Commission documentation is subject to specific conditions - requests must be submitted via the Commission's EASE portal and, under Regulation (EC) No 1049/2001, must come from an EU Member State national or a third-country national resident in a Member State (or a legal person with a registered office in a Member State). In addition, processing is extended when documents are held by different Commission services that must be consulted (triggering deadline extensions). As a result, full documentation - including detailed financial annexes and complete environmental and social assessments - is not systematically publicly available. This creates an ironic and material transparency gap, as **Western Balkan beneficiaries - despite being the intended end users and implementers of WBIF-supported actions - face structural barriers to accessing the documentation needed to scrutinize allocations, implementation and results.**

The report strives to achieve four key analytical aims through evidence-based assessment, as shown in figure below.

#### MAPPING AND ANALYSIS

To systematically document and analyze climate-related projects supported by the WBIF

#### EVALUATION

To assess how gender equality objectives are integrated within project documentation, financial flows, and implementation results

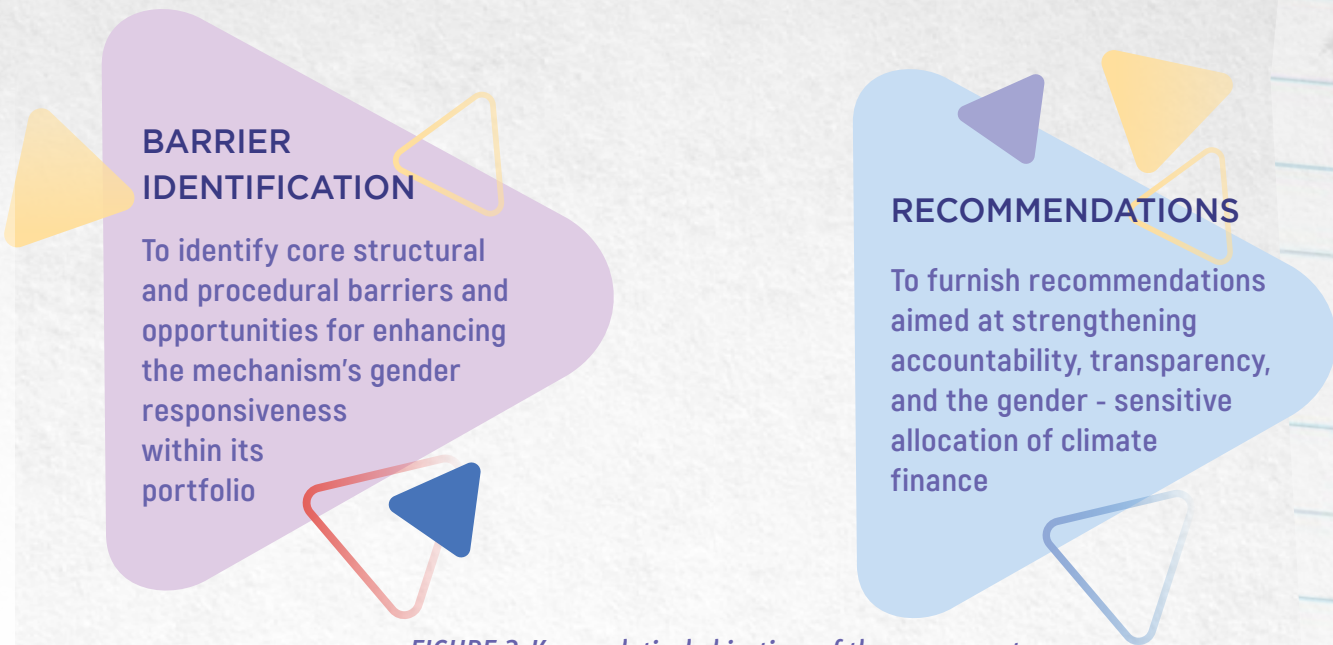


FIGURE 2: Key analytical objectives of the assessment

## 2.2. DELIVERY APPROACH AND METHODOLOGICAL FRAMEWORK

The development of this report utilizes a structured **gender - responsive budgeting (GRB) analysis approach**. The methodology involves a comprehensive desk review of documents and data, followed by analytical synthesis. The analysis applies a gender lens across three distinct levels: **Macro** (policy/strategy), **Meso** (institutional/procedural), and **Micro** (project).

The evaluation is of a summative character, employing a predominantly qualitative methodology complemented, where possible, by quantitative data insights on financial flows and results. The foundational analytical method is the GRB analysis approach, which seeks to assess whether public and international climate funds are allocated and utilized in a transparent and gender-responsive manner. Central to this is the application of **Gender Analysis/Assessment** to assess differentiated needs and access to resources for women and men.

A total of 68 documentary resources were utilized to provide the strategic, procedural and institutional context for WBIF and its partner institutions, complemented by established EU, IFI and development gender equality and GRB frameworks. The reviewed materials include EU policy communications and guidance (EIP, Green Agenda, Growth Plan), WBIF governance, application and reporting documents (guidelines, GAF templates and selected GAFs obtained through formal access request, annual reports, sector factsheets, flagship lists), and partner institutions' gender strategies and access-to-information policies, ensuring that the analysis is grounded in both the operational rules of the financing mechanism and the relevant normative standards for gender-responsive climate finance.

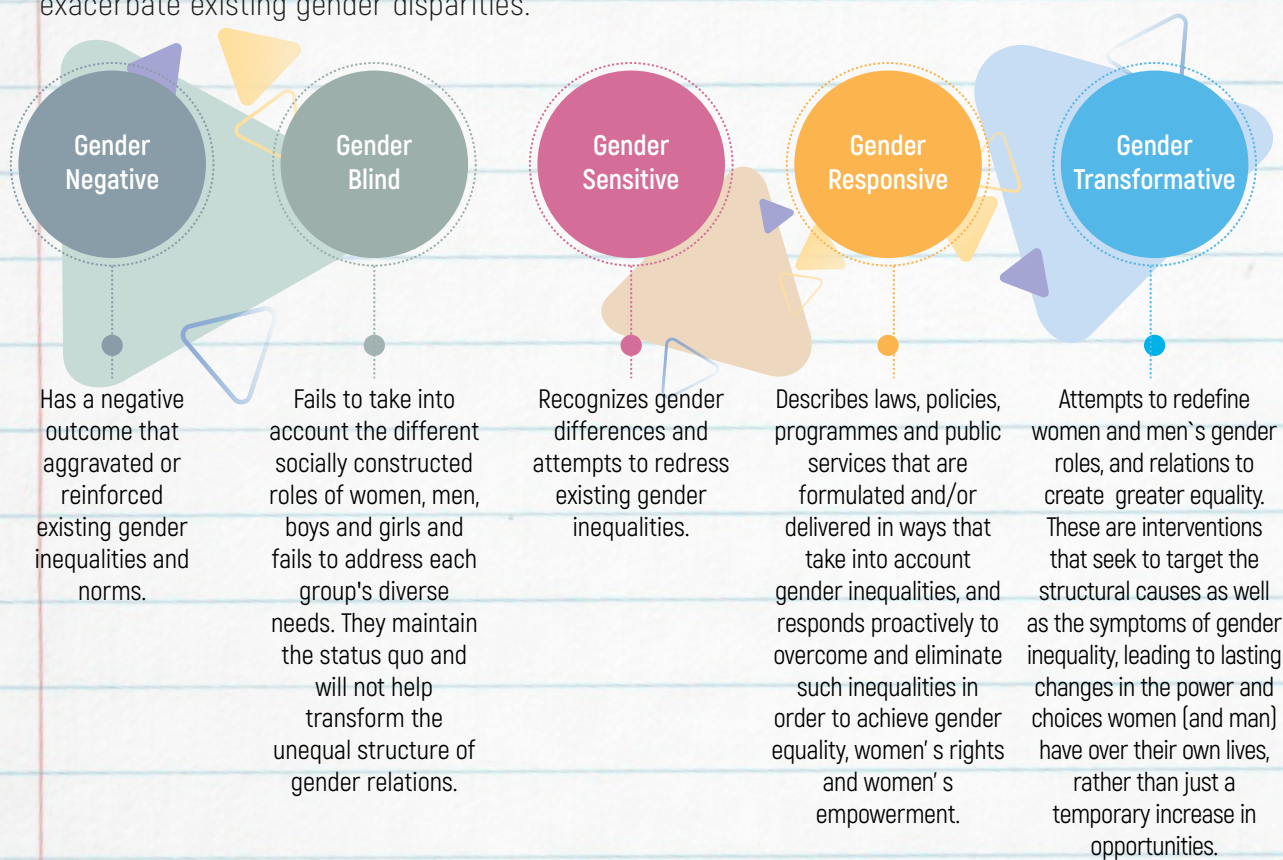
The methodological approach is structured across four primary, interconnected stages, all analyzed through a GRB lens.

**STAGE 1: Strategy and Policy Review (Macro Level)**, requires the purposeful assessment of the WBIF's strategic framework concerning the incorporation of gender equality and responsiveness to the differentiated needs of women and men. This establishes the institutional baseline for gender integration across WBIF's strategic framework and funding priorities. Methods employ a detailed Desk Review and Content Analysis of WBIF's strategic and operational documents using a GRB framework.

**STAGE 2: Analysis of WBIF and Partner Institutions Procedures (Meso Level)**, examines the extent to which GRB and equality principles are embedded within WBIF’s operational and procedural frameworks, including how project selection, appraisal, and funding mechanisms integrate gender considerations. This involves a Procedural Document Audit of operational manuals and appraisal forms and a Template and Content Analysis to assess if standard submission procedures allow applicants to meaningfully reflect gender objectives.

**STAGE 3: Project/Investment Data Analysis (Micro Level)**, conducts an in - depth GRB analysis of 10 selected WBIF projects across their full investment cycle—from planning and approval to implementation, monitoring, and reporting. This utilizes a four - step GRB Analytical Framework: Situation Analysis, Budget Analysis, Implementation and Output Tracking, and Performance and Outcome Evaluation.

The primary classification tool applied here is the **Gender Marker / Typology Assessment**, which uses the **Gender Results Effectiveness Framework (GRES)** scale. The GRES scale captures variation in the type of gender results delivered by interventions and classifies projects based on the depth of their engagement with gender inequalities. The GRES tool is instrumental in classifying selected WBIF projects to determine if their outcomes are designed to reduce or exacerbate existing gender disparities.



**FIGURE 3: Gender Results Effectiveness Framework (GRES) scale**

**STAGE 4: Identification of Barriers, Opportunities, and Recommendations (Synthesis Phase)**, this final stage consolidates findings from the policy, procedural, and project analysis components to formulate practical, action - oriented recommendations. Barriers will be categorized as policy/strategic, institutional/procedural, or project/operational.

The methodological approach therefore combines structured GRB analysis with a pragmatic interpretation of available evidence, acknowledging both the analytical depth and the limitations imposed by data accessibility.

### 3. INSTITUTIONAL ANALYSIS

This section analyses the institutional and policy frameworks that shape how gender equality considerations can (or cannot) be embedded in **climate-related public finance channelled through the Western Balkans Investment Framework (WBIF)** across the WB6. It examines the presence (or absence) of dedicated gender equality policies at the level of the funding mechanism and within the beneficiary context (sectoral, municipal, regional and state levels), and identifies which institutional mechanisms are responsible for ensuring gender equality in planning, implementation and accountability. In particular, the analysis covers: (i) whether WBIF itself includes a dedicated gender policy or relies on cross-cutting requirements; (ii) how partner International Financial Institutions (IFIs) articulate and operationalise gender equality commitments; (iii) the broader EU policy landscape that sets normative expectations for gender equality and its integration into climate and investment programming; and (iv) how these policy requirements are procedurally implemented through WBIF processes in the WB6.

In institutional terms, WBIF is a **blended finance platform** that combines EU grant resources with lending and other instruments provided through participating IFIs and financial partners. Its governance is organised through two governing bodies - the **Strategic Board and the Operational Board** - co-chaired by the European Commission and a rotating bilateral donor, with the Operational Board responsible for approving grant applications. Operationally, WBIF is implemented through a defined division of roles between Beneficiary authorities, Lead Financial Institutions (LFIs) and WBIF governing bodies, with the **Management Information System (MIS)** serving as the central procedural channel for submission, processing and documentation of grant requests.

The WBIF project financing cycle follows a structured, multi-stage process designed to ensure policy coherence and due diligence. Project proposals typically originate from Beneficiary authorities, either as a **project concept** or as an existing investment drawn from the **Single Project Pipeline (SPP)**, and are advanced in cooperation with an LFI. At the early stage, the LFI - working with the European Commission and the Project Financiers' Group - supports initial screening and structuring. Once the concept is accepted for further development, the proposal progresses into a **Full Grant Application Form (GAF)**, supported by the required technical documentation and safeguards assessments, including environmental and social analyses (where relevant). It is within this phase that formal compliance expectations - including gender equality and non-discrimination requirements - are expected to be reflected in the project rationale, safeguards approach and results logic. The Project Financiers' Group then appraises the full proposal and confirms the readiness and co-financing arrangements before a final award decision is taken by WBIF governance, initiating implementation. Monitoring and results reporting requirements established during the planning and appraisal stages then become binding throughout implementation.

This sequencing is directly relevant for gender integration because it determines **where** gender requirements are assessed (e.g., screening grids, additionality narratives and results framework provisions) and **who** must provide the evidence (primarily the Beneficiary authority and the LFI). Finally, the WBIF procedural system distinguishes between investment grant applications and technical assistance (TA) operations that support project preparation and implementation. This distinction is important for gender equality, as TA often provides the technical capacity needed to conduct gender-sensitive diagnostics, strengthen safeguards implementation and ensure that sex-disaggregated indicators and monitoring arrangements are practically feasible during delivery.

### 3.1. INSTITUTIONAL MECHANISMS AND GOVERNANCE STRUCTURE

From an institutional accountability perspective, the WBIF operating model can be described through a coherent set of interlinked layers that jointly determine how projects are prepared, screened, approved and implemented - and, by extension, where gender equality requirements can be introduced and verified. WBIF operates as a blended finance platform, combining EU grant resources (historically anchored in IPA) with lending and other financial instruments delivered through Partner Financial Organisations (IFIs), with procedures organised and documented through the WBIF Management Information System (MIS). Within this model, responsibilities are distributed across four functional layers.

First, the **beneficiary coordination and submission layer** is led by Beneficiary authorities, which are responsible for endorsing and advancing proposals through the WBIF process, confirming alignment with national priorities and ownership arrangements, and ensuring that submissions are correctly structured in the MIS. Procedurally, this function is typically coordinated through the National IPA Coordinator (NIPAC), who oversees the supervision of proposals and performs required submission steps in the MIS. This layer is also responsible for clarifying domestic implementation arrangements - such as the responsible authority, implementing entity and institutional set-up - and for describing the flow of WBIF resources down to final recipients, which becomes relevant when assessing whether gender-responsive intent can be traced through implementation structures and accountability lines.

Second, the **Lead Financial Institution (LFI) layer** is central to the credibility, bankability and implementability of the proposal. LFIs—such as EIB, EBRD, KfW and other participating financiers - formally support applications, co-design financing structures with Beneficiaries, and ensure the proposal meets due diligence expectations, including safeguard documentation and results reporting requirements. TA guidance further requires clarity on the role of the LFI and co-financiers, the existence and capacity of Project Implementation Units (PIUs), and whether additional technical assistance is needed to fill capacity gaps. In practice, the LFI also becomes the key institutional interface between WBIF requirements and the IFI's own internal standards, meaning that the depth of gender integration may vary depending on how the LFI applies its safeguard and gender policies within the WBIF framework.

Third, the **WBIF screening and approval layer** provides the formal gatekeeping function. The institutional decision chain includes technical screening and appraisal functions and culminates in WBIF governing decisions on grant awards. Within this architecture, the Project Financiers' Group (PFG) performs a critical quality-control role by agreeing whether Grant Application Forms (GAFs) are sufficiently robust for submission, should be placed on hold, or should be rejected. The final decision is then taken by the WBIF governing body responsible for approvals (Operational Board), either through meetings or written procedure. This layer is therefore the principal locus for applying WBIF-specific requirements - such as additionality justifications, eligibility rules and results reporting obligations - at the point of award decision.

Finally, the **MIS-enabled procedural layer** underpins the entire system by standardising templates, enforcing completeness checks, supporting auto-calculations and enabling document generation (including the automated production of Terms of Reference for TA actions after approval). This standardisation strengthens administrative coherence across a diverse portfolio and multiple implementing partners. At the same time, it has direct implications for gender-responsive

budgeting: what is not embedded in MIS structures - such as mandatory gender budget tagging fields or expenditure-tracking architecture - cannot be systematically required across the portfolio and becomes difficult to enforce consistently during implementation and monitoring or to verify through financial reporting.

## 3.2. INTEGRATION OF GENDER EQUALITY IN WBIF PROCEDURES

The evidence from WBIF guidance documents indicates that gender equality is embedded primarily as a **cross-cutting compliance and screening requirement**, rather than through a dedicated WBIF gender strategy. In practice, gender integration is operationalised through three procedural entry points:

### 3.2.1. Project justification and screening

WBIF procedures embed gender equality primarily through **formal appraisal requirements** rather than through discretionary narrative commitments. At the application stage, WBIF templates require project proponents to demonstrate the project's broader development value beyond financing - particularly through the concept of **social additionality**. Within the WBIF "additionality" narrative, applicants are explicitly asked to explain whether - and how - the proposed action will **"promote gender equality and equal opportunities."** In parallel, WBIF screening tools treat gender equality as a compliance checkpoint: the screening grid includes a dedicated criterion to assess the project's **"impact on gender equality and non-discrimination."** Where labour-market outcomes are part of the investment logic, the screening and results logic also anticipate **sex- and age-disaggregated reporting** (for example, jobs created or maintained disaggregated by sex and age). Taken together, these provisions confirm that gender is not positioned as optional or secondary content; instead, it is institutionalised within the decision architecture as a requirement to be addressed during appraisal and screening. At the same time, the practical strength of this integration depends on the quality of evidence presented by Beneficiaries and Lead Financial Institutions (LFIs), and on how far the LFI applies its own institutional standards to elevate gender responsiveness beyond minimum compliance.

This procedural embedding of gender equality within WBIF also interacts with a wider ecosystem of institutional requirements stemming from EU policy expectations and the diverse methodologies of partner financial institutions. Applicants are expected to demonstrate compliance with relevant EU policies and to show that project design responds to non-discrimination obligations and the needs of potentially disadvantaged groups. The screening framework explicitly tests whether the proposal substantively addresses gender equality issues, while the additionality narrative requires a concrete account of how grant support contributes to gender equality and equal opportunities. Importantly, the translation of these requirements into project design, safeguards and monitoring is shaped by the LFI's appraisal approach, as WBIF projects are implemented through financiers with distinct, though often complementary, gender mainstreaming systems.

Across partner institutions, formal approaches range from mandatory risk-based due diligence to outcome tagging and results tracking. The World Bank Group (WBG) embeds gender into project justification through upstream analytics and strategic engagement, and operationalises accountability at project level through mandatory gender tagging mechanisms that require (i) identification of a gender gap based on diagnostics, (ii) defined actions to address that gap, and (iii)

inclusion of indicators to track results. The European Bank for Reconstruction and Development (EBRD) integrates gender through its structured gender approach within investment appraisal, complemented by environmental and social due diligence that requires gender-sensitive baseline information and attention to gender-based risks. The European Investment Bank (EIB) Group applies a risk-and-opportunity logic framed around the protection of rights and “do no harm” safeguards, while also encouraging gender integration where clients and project conditions allow. KfW Development Bank treats gender mainstreaming as a cross-cutting principle, requiring gender-sensitive analysis from the planning phase onward to ensure project designs do not reinforce discrimination and can contribute to reducing inequalities. Agence Française de Développement (AFD) strengthens accountability through systematic application of the OECD gender equality policy marker, which requires project teams to score - and justify - the degree to which gender equality is a principal objective, a significant objective, or not targeted.

In practice, the WBIF procedural system provides clear entry points for gender equality and non-discrimination during project justification and screening. However, the depth of gender integration and the robustness of monitoring will remain contingent on (i) the analytical and implementation capacity of project promoters, (ii) the ability to generate and report credible sex-disaggregated evidence, and (iii) the extent to which the LFI’s own standards and safeguards reinforce and operationalise the WBIF requirements throughout the project lifecycle.

### 3.2.2. Results framework and monitoring requirements

WBIF monitoring requirements establish a baseline accountability expectation for gender-disaggregated reporting, particularly where project indicators measure outcomes for people. The WBIF Results Framework guidance requires that indicators pertaining to individuals should be disaggregated by **sex**, and also by **age** and **disability status**, “where relevant and possible.” This is a material procedural requirement because it creates an explicit expectation that social outcomes funded through WBIF can be assessed for differential effects across population groups, and that gender equality is not treated solely as an upstream design consideration but also as a measurable dimension of results during implementation. In practical terms, this requirement applies across WBIF grants irrespective of which Lead Financial Institution (LFI) is leading the operation, thereby providing a common minimum denominator for gender accountability at portfolio level.

At the same time, the conditional wording - “where relevant and possible” - has substantive implications for the robustness of reporting. It allows non-reporting in situations where project arrangements do not capture sex-disaggregated data, where national statistical systems do not routinely support the required breakdowns, or where implementing entities and partners do not collect (or do not disclose) disaggregated results. As a consequence, while WBIF rules create a formal monitoring expectation, actual performance depends on implementation capacity, the design of monitoring systems at project level, and the willingness and ability of implementing bodies to generate disaggregated evidence throughout delivery.

Beyond WBIF’s core Results Framework requirement, accountability is reinforced through the broader due diligence architecture applied by partner financial institutions and through the design of certain blended instruments that incorporate explicit gender objectives. WBIF’s private sector instruments - implemented through partner institutions and regional facilities - illustrate how gender objectives can be integrated into financial products via quantitative targets (for example, dedicated shares of investments or guarantees linked to women-led initiatives). Such instruments demonstrate a pathway for translating gender policy intent into measurable

investment parameters, which is particularly relevant for gender-responsive climate finance where impacts often flow through access to finance, jobs, and service delivery. However, the monitoring systems of partner institutions are not uniform, and publicly available information does not consistently allow verification of how gender indicators are defined and tracked within WBIF-supported operations. Several IFIs and financiers maintain institutional monitoring frameworks (including strategy-level targets and internal scorecards), but the level of disclosure on gender-specific indicators, templates, or reporting formats applied in the Western Balkans context varies considerably. As a result, while WBIF sets a baseline expectation for sex-disaggregated reporting at results level, the practical ability to assess gender outcomes across the portfolio remains uneven and, in some cases, constrained by limited transparency and the availability of comparable, project-level gender data in the public domain.

### 3.3. PROCEDURAL BARRIERS AND INSTITUTIONAL GAPS FOR GRB IMPLEMENTATION

The WBIF framework demonstrates **explicit procedural recognition of gender equality** through screening questions, additionality narratives, and requirements for sex-disaggregated indicators. However, the evidence also shows structural constraints that limit the feasibility of full Gender-Responsive Budgeting (GRB) implementation in practice.

**Absence of mandatory gender budget tagging in WBIF financial templates.** WBIF grant application budgeting is structured around standard infrastructure cost components (e.g., planning/design, land, TA, works, supplies, contingencies), with the MIS enforcing completeness and internal consistency (including auto-filled totals). These budget structures do not include a dedicated field or mandatory classification for tagging expenditures according to gender objectives (or tracking the share of total costs attributable to gender-related outputs). As a result, even when gender equality is referenced in additionality narratives or screening grids, the financial architecture does not systematically translate those commitments into traceable budget allocations.

**Capacity-dependence and implementation asymmetries.** The WBIF guidance anticipates that Beneficiaries may need external support to manage preparation, procurement, and implementation complexity, explicitly requesting clarity on whether additional TA is needed and whether PIUs can implement without such support. This matters for GRB because weak institutional capacity reduces the likelihood that gender analysis, gender-disaggregated monitoring, and gender-responsive financial tracking will be maintained consistently throughout implementation.

**Transparency and access-to-data constraints.** As reflected in the access-to-documents conditions, the study's findings are necessarily constrained by limitations on what project-cycle documentation and monitoring data can be accessed by non-institutional users. These limitations are particularly consequential because they can result in an "accountability inversion": WBIF beneficiaries and stakeholders - despite being the ultimate end-users of WBIF-financed investments - may face practical barriers to accessing the very information needed to assess gender responsiveness, trace spending, and validate results at national and local level.

Taken together, the institutional system contains clear **procedural hooks** for gender equality, but the lack of **financial tagging architecture** and the presence of **data-access constraints** substantially weaken the capacity to perform rigorous GRB verification and expenditure tracking across the WBIF cycle. This gap is particularly critical on the context of climate finance, where the effectiveness of investments increasingly depends on their ability to address differentiated user needs and ensure inclusive outcomes.

## 4. NEEDS ASSESSMENT

The Needs Assessment constitutes the **micro-level analysis** of how WBIF-supported interventions procedurally recognise - and, where possible, financially respond to - the differentiated needs of women, men and vulnerable groups. It reviews the mandatory requirements within the WBIF framework for identifying user needs, maps key users and stakeholders across sectors, identifies sector-specific gender considerations, and diagnoses the procedural and information gaps that limit the translation of identified needs into verifiable budget allocations and implementation measures. While WBIF guidance embeds cross-cutting requirements on **gender equality, non-discrimination and results disaggregation**, closer examination indicates recurring gaps in practice - particularly in the linkage between needs identification, budgeting structures and accessible monitoring evidence - meaning that specific beneficiary needs are not consistently visible in financial allocation and implementation documentation.

### 4.1. MAPPING USERS AND STAKEHOLDERS OF WBIF INTERVENTIONS

A robust needs assessment requires a clear delineation of **end-users (beneficiaries)** and **institutional actors (stakeholders)** across the WBIF financing cycle, in order to understand differential benefits, distributional risks, and the practical scope for accountability and advocacy coalitions. This mapping is essential for aligning project design and results logic with gender equality and non-discrimination requirements embedded in WBIF procedures and partner standards.

Users of WBIF interventions are inherently heterogeneous and can be mapped primarily by sector. In **infrastructure sectors** (transport, energy, environment), users include the general public, commuters (including public transport users), households and firms consuming energy services, and local communities directly affected by construction works, resettlement risks, service disruptions or service coverage improvements. In **private sector and finance** interventions, users include MSMEs and entrepreneurs seeking access to capital, as well as households accessing green finance products for energy efficiency and renewable energy investments - where differentiated barriers are frequently observed for women-led enterprises and, in some contexts, female-headed households. Stakeholders include the institutional actors whose mandates, incentives and compliance frameworks shape project outcomes beyond the end-user level:

- **Policy-setting stakeholders** - the European Commission (including the WBIF Secretariat function within the Commission), WBIF governing bodies (Strategic Board / Operational Board), and bilateral donors. Their institutional priorities are alignment with EU policy packages (EIP, Growth Plan and related sectoral agendas), accession-oriented reform coherence, and demonstrable compliance with cross-cutting EU policy commitments, including those relevant to gender equality.
- **Implementing stakeholders** - Beneficiary authorities (line ministries, national coordination functions such as NIPAC structures, implementing agencies and PIUs) and LFI/partner financiers. Their functional priorities are bankability, timely implementation, compliance with environmental and social requirements, and deliverable results under agreed reporting frameworks.

- **Accountability stakeholders** - civil society organisations, gender equality mechanisms (agencies/units), independent oversight actors and media. Their institutional priorities are transparency, traceability of public finance (including GRB-relevant tracking), and verifiable progress against national gender equality commitments and international norms.

## 4.2. IDENTIFYING NEEDS AND GENDER CONSIDERATIONS BY SECTOR

The GRB needs assessment focuses on how sector investments translate into differentiated outcomes for women and men, recognising that “general infrastructure” provision does not automatically deliver equitable benefits without explicit design, targeting and monitoring choices.

**TABLE 1: Needs and gender considerations by sector**

SECTOR	GENERAL NEED	GENDER CONSIDERATIONS	OBSERVED GAP
<b>Sustainable transport / infrastructure</b>	Improved connectivity, safety, service reliability, and lower travel time and costs.	Women often have more complex trip chains linked to care responsibilities and are more reliant on public transport and walkable access. Safety features (lighting, safe waiting areas, predictable schedules, accessible information, grievance mechanisms) reduce exposure to harassment and insecurity. Gender-responsive outcomes include equitable access to jobs and services and expanded opportunities for women's employment in project-related value chains.	Projects frequently prioritise technical outputs (corridor capacity, speeds, kilometres) while “service usability and safety” components and sex-disaggregated employment outcomes are less consistently specified, costed, or monitored in a manner that is traceable through standard WBIF budget structures.
<b>Clean energy / energy efficiency</b>	Energy security, emissions reduction, and lower household and firm energy costs.	Equitable access to finance and support for EE/RES measures is critical where women face constraints in collateral, financial literacy, or decision-making power, and where energy poverty creates disproportionate burdens on women's time and health. Gender-responsive delivery may require targeted outreach, eligibility design, advisory support, and skills development pathways for women in technical roles and green jobs.	Financing and TA packages are often designed around technical and financial viability, while gender-specific targeting and evidence (sex-disaggregated participation, barriers addressed, distributional outcomes) is not consistently visible or verifiable in project-cycle documentation available for external review.

<p><b>Environment &amp; climate (water, wastewater, waste management, pollution control)</b></p>	<p>Expanded and improved access to basic services (safe water, wastewater treatment, solid waste management), reduced pollution and health risks, and stronger climate resilience of local services and infrastructure.</p>	<p>Women often bear a disproportionate unpaid care burden linked to water collection/management, household hygiene, and caregiving during illness; improved services can reduce time poverty and health impacts. Inclusive design should ensure equitable service coverage for vulnerable groups (low-income households, informal settlements, marginalised communities) and accessible information/complaint channels. Employment and procurement opportunities can be structured to support women's participation where feasible.</p>	<p>Monitoring commonly emphasises infrastructure delivery outputs (connections, network length, treatment capacity, tonnes diverted) while gendered outcomes (time savings, reduced care burden, health co-benefits, equitable service access) are rarely translated into measurable, sex-disaggregated indicators and are not easily traceable in WBIF budgeting templates that classify costs by technical categories rather than social outcomes.</p>
<p><b>Private sector / MSME finance</b></p>	<p>Improved access to finance, risk mitigation, and business support for MSMEs and households using green finance products.</p>	<p>Women-led MSMEs often face structural barriers (collateral gaps, smaller ticket access, weaker networks, limited tailored products). Needs include targeted financial products, advisory services, mentorship, and improved access conditions (including simplified requirements and outreach).</p>	<p>While regional instruments and facilities exist, monitoring and disclosure often concentrate on aggregate volumes and counts, with limited granularity on gender outcomes - especially where finance is intermediated through financial institutions and reporting relies on internal systems not consistently accessible for external verification.</p>

### 4.3. PROCEDURAL GAPS IN MEETING DIFFERENTIATED NEEDS

WBIF procedures provide formal entry points for needs recognition - through screening, additionality narratives and results expectations - but systemic gaps remain in how needs are translated into budgeted, traceable commitments. The most material constraint is that needs identification is not consistently linked to **financial allocation architecture** in a way that allows verification of whether resources were earmarked and spent to address specific gender-responsive measures.

Key procedural disconnects include: (i) variability in LFI approaches, meaning gender requirements may be applied unevenly depending on the financier's internal frameworks; (ii) the fact that WBIF budgeting templates and MIS structures primarily categorise expenditure by technical cost types (works, supplies, TA) rather than by social outcome categories, limiting the feasibility of **gender budget tagging**; and (iii) reliance on project-level safeguards and results documentation that is not always available in sufficient depth to confirm baseline needs, mitigation measures and gender-disaggregated outcomes. Consequently, the GRB agenda requires procedural reinforcement to ensure that identified gender and vulnerability needs are translated into **verifiable budget commitments**, implementation measures and accessible evidence across the project cycle.

## 4.4. PROJECT EXAMPLES DEMONSTRATING THE CHALLENGE

This analysis applies a GRB-oriented review method to selected WBIF-relevant projects and programmes, checking (i) whether mandatory procedural commitments on gender/non-discrimination are present in accessible documentation (“procedural mandate check”), and (ii) the practical barriers that prevent robust quantitative or qualitative GRB verification (“data and structural constraints”). A cross-cutting constraint is that standard GAF budgeting structures classify costs by technical categories rather than by gender/social outcomes, which limits the ability to trace financial flows dedicated to gender-responsive measures.

An infrastructure analogy helps frame this challenge: WBIF procedures can require protection and equitable treatment of users (a strong “safety manual”), but if the budget blueprint lacks dedicated “circuit mapping” for gender-responsive measures (gender budget tags), it becomes difficult to verify how much of the investment cost was specifically directed to deliver mandated equity outcomes - even where such outcomes are referenced in narratives or safeguards.

Below is the consolidated needs-assessment perspective for the ten selected examples, based on the level of detail typically available in project summaries, application documentation and public disclosure. It is important to note that the study was hampered by lack of available information and these findings should be taken with caution and as initial findings on these projects/programmes.

*Table 2: Needs assessment of ten selected example project/programmes*

PROJECT / PROGRAMME	FINDINGS
<b>Kosovo Energy Efficiency in Public Buildings Programme</b>	Demonstrates social relevance and broad public-service benefits, but the available documentation does not allow robust verification of how differentiated needs were assessed or budgeted, which limits a full GRB financial tracing exercise.
<b>Belgrade Public Transport and Traffic Infrastructure - PHASE 2</b>	Includes clear procedural expectations for compliance with social standards and for considering user needs, including safety and inclusion dimensions. In practice, independent verification is hindered when key baseline and safeguard documentation (e.g., detailed ESIA/ESAP annexes) is not publicly available in sufficient depth to assess sex-disaggregated needs and mitigation measures.
<b>Water Supply &amp; Wastewater Treatment in Medium-Sized Municipalities VI</b>	Reflects an equity logic through improvements in service coverage and access. At completion stage, reporting typically remains centred on infrastructure delivery metrics (connections, volumes, network length), while gendered outcomes - such as time savings, reduced care burden, and health co-benefits - are more difficult to capture systematically without robust sex-disaggregated monitoring.
<b>Mediterranean Corridor (R1/R2): Adriatic-Ionian Highway</b>	Safeguards requirements imply attention to social and safety risks during construction. Nonetheless, the dominant emphasis is on technical connectivity and design maturity, meaning that gender considerations are more often addressed through “do no harm” risk mitigation than through explicitly defined measures to support differentiated mobility needs or broader inclusion outcomes.

<b>Kolašin Biomass District Heating System</b>	The project highlights broader social and affordability benefits. In preparatory phases, however, the focus typically remains on technical feasibility, financial structuring and procurement readiness, while gender-responsive outputs and monitoring are not explicitly defined unless deliberately embedded in the TA scope and results framework.
<b>Regional Sanitary Landfill for Živinice, Banovići and Kladanj</b>	Has high safeguards relevance and therefore a strong need for credible baseline social profiling. The reliability of a differentiated needs assessment depends heavily on the depth and availability of baseline and monitoring information for vulnerable groups and distributional impacts over time.
<b>Bogdanci Wind Park Phase 1 Pilot Project</b>	As an early-stage or pilot-type investment, delivery priorities are typically concentrated on technical performance and operational proof of concept. As a result, gender-responsive employment and skills pathways tend to remain under-specified unless they are explicitly required through conditionalities and associated monitoring provisions.
<b>REEP Plus – KfW Programme Implementation</b>	Aligns with programme-level objectives on green finance access and inclusion. Because it operates through financial intermediaries, the ability to link a specific WBIF contribution to final gender outcomes depends heavily on intermediaries' internal reporting and data availability, which reduces traceability of GRB-relevant financial flows.
<b>Green Economy Financing Facility II (GEFF II)</b>	Requires articulation of broader benefits, including social dimensions, through additionality narratives. Granular tracking of gender outcomes remains challenging where finance is channelled through multiple intermediaries and where budgeting templates do not allow expenditures to be tagged by gender outcome categories, leaving reliance primarily on qualitative justification and intermediary-level reporting.
<b>Promotion of Investments in Energy Efficiency and Renewable Energy in the Banking Sector</b>	Seeks to expand access to green finance products and address market barriers through blending and guarantee structures. These instrument features increase complexity in tracing the specific role of the grant component for gender-specific access outcomes, and accountability often relies on high-level compliance or action plans rather than on traceable, gender-tagged spending and consistently disaggregated beneficiary evidence.

## 5. POLICY ANALYSIS

This chapter reviews the policy architecture that governs how gender equality considerations are expected to be integrated in climate-related public finance channelled through the Western Balkans Investment Framework (WBIF). It focuses on (i) the WBIF policy and procedural framework (including the MIS/GAF architecture), (ii) the policy regimes of key partner financial organisations and donors that shape safeguards and appraisal practice, and (iii) the extent to which these rules translate into verifiable gender-responsive budgeting (GRB) across the project cycle. The analysis confirms a consistent pattern: **gender equality is positioned as a mandatory “quality and compliance” dimension in screening, additionality narratives, and results frameworks, yet the WBIF system does not currently embed GRB tools that would enable systematic tracking of spending specifically allocated to gender equality outcomes.**

### 5.1. GENDER AS A CROSS-CUTTING COMPLIANCE AND QUALITY CRITERION

WBIF guidance for both investment grants and technical assistance requires applicants to demonstrate alignment with EU policy objectives and to articulate broader benefits that go beyond technical delivery. Within this structure, **gender equality and equal opportunities are explicitly referenced as cross-cutting expectations.** In the screening grid used during appraisal, gender is directly assessed through a dedicated criterion on “impact on gender equality and non-discrimination,” placing gender alongside other policy and sustainability considerations as a formal checkpoint.

At the same time, WBIF’s “additionality” logic reinforces gender as part of the justification for why a grant is needed. In technical assistance guidance, applicants are invited to describe additionality and explicitly include cross-cutting benefits such as promotion of gender equality and equal opportunities. In investment grant guidance, the additionality narrative similarly directs applicants to address cross-cutting issues, including gender equality and equal opportunities, where applicable.

These provisions confirm that gender is not treated as optional narrative content; rather, it is embedded as a **procedural expectation within justification and appraisal.**

### 5.2. RESULTS AND MONITORING POLICY

WBIF policy also creates an explicit pathway for gender accountability through its results framework. Indicators pertaining to individuals are expected to be disaggregated by sex (and, where relevant, age and disability status), “where relevant and possible.” This requirement is important because it establishes, at least in principle, the data conditions needed to assess whether results differ across women and men and whether interventions benefit vulnerable groups equitably. However, the qualification “where relevant and possible” is material. It creates space for non-reporting where implementing entities do not collect sex-disaggregated indicators, where monitoring responsibilities are not consistently enforced, or where information is not disclosed. This is consistent with WBIF’s own evaluation evidence, which notes the difficulty of tracing socio-economic impacts in the absence of relevant statistical data. The evaluation further indicates that, although gender impacts were targeted (particularly in social-sector

interventions), they were in many cases not followed up after project completion, limiting robust ex-post assessment. A related finding highlights that gender/minority issues were usually not followed up during or after implementation, constraining WBIF's ability to evidence outcomes attributable to the mechanism. Collectively, this points to a recurring gap between formal policy expectations and the consistency of monitoring practice.

### 5.3. ALIGNMENT WITH EU GENDER POLICY AND ENLARGEMENT PROGRAMMING

WBIF's gender framing is not a standalone policy regime; it reflects a broader EU external action and enlargement context where gender equality is mainstreamed across programming and financial instruments. EU external action frameworks (including the Gender Action Plan III, 2021–2025) establish gender equality as a core objective and a cross-cutting requirement for EU-funded action. This approach is reinforced by EU-level gender equality strategies that operationalise mainstreaming principles and encourage integration of gender considerations across policy domains, including climate and infrastructure-related investment programming. Within the WBIF system, this translates into gender appearing in screening criteria, additionality narratives, and results reporting expectations, rather than being implemented as a separate gender-only funding window.

### 5.4. PARTNER POLICIES AND HOW THEY SHAPE GENDER INTEGRATION IN WBIF-SUPPORTED OPERATIONS

Because WBIF investments are designed and implemented with partner financial organisations (IFIs and other financial partners), the operationalisation of gender equality is substantially mediated through IFI policy frameworks. In practice, WBIF's procedural requirements interact with IFI safeguards, due diligence standards, and monitoring systems. This "stacked" policy environment strengthens baseline social compliance, but it can also create variability across projects depending on which institution is the lead financier and which internal procedures drive appraisal and supervision.

**TABLE 3: IFI gender policy overview**

IFI	GENDER POLICY FINDINGS
<b>World Bank Group (WBG)</b>	The WBG Gender Strategy 2024–2030 prioritises acceleration of gender equality outcomes through structured diagnostics and results frameworks, with gender gap identification and measurable results as the main accountability logic. In blended settings, this tends to emphasise outcome tracking and operational actions over expenditure tagging, aligning with WBIF's screening/results approach but not, by itself, resolving GRB traceability.
<b>International Finance Corporation (IFC)</b>	IFC's gender approach is anchored in private-sector impact logic and investment/advisory integration. In intermediated finance structures, gender monitoring and disclosure often depend on financial intermediaries' internal systems, which can reduce transparency for external reviewers and limit tracing of gender-specific financial flows at beneficiary level.

<p><b>European Bank for Reconstruction and Development (EBRD)</b></p>	<p>EBRD applies a structured framework to integrate gender into operations and monitoring through project-level measures and tagging/classification disciplines. In WBIF-supported projects led by EBRD, gender is commonly embedded via safeguards and project design features; however, the depth of implementation and the availability of publicly accessible evidence can vary by project and disclosure conditions.</p>
<p><b>European Investment Bank Group (EIB/EIF)</b></p>	<p>The EIB Group's gender strategy ("Protect, Impact, Invest") frames integration through mandatory risk and safeguards due diligence (Protect) and positive impact and investment focus areas (Impact/Invest). This supports "do no harm" compliance and enables gender-positive design, but it is generally not implemented through mandatory gender budget tagging within WBIF templates, leaving the GRB gap unresolved unless explicit project-level mechanisms are imposed.</p>
<p><b>Agence Française de Développement (AFD)</b></p>	<p>AFD's portfolio-level classification and reporting rely strongly on the OECD DAC gender marker, providing systematic tagging of whether operations target gender equality as a principal or significant objective. This is closer to GRB traceability at portfolio level, but it is not automatically translated into WBIF MIS budget lines unless WBIF itself requires comparable tagging for grant components.</p>
<p><b>Council of Europe Development Bank (CEB)</b></p>	<p>CEB's public-facing approach is most visible through its social mandate and safeguards frameworks. Where gender is addressed, it is typically via general inclusion and non-discrimination lenses rather than explicit gender budget markers comparable to OECD-based systems, which limits GRB-style expenditure tracing through publicly available documentation.</p>
<p><b>Promotion of Investments in Energy Efficiency and Renewable Energy in the Banking Sector</b></p>	<p>Seeks to expand access to green finance products and address market barriers through blending and guarantee structures. These instrument features increase complexity in tracing the specific role of the grant component for gender-specific access outcomes, and accountability often relies on high-level compliance or action plans rather than on traceable, gender-tagged spending and consistently disaggregated beneficiary evidence.</p>

## 5.5. CORE POLICY GAP

Across the WBIF ecosystem, policy requirements create a coherent compliance narrative: applicants must consider gender equality and non-discrimination, demonstrate additionality, and report results with sex-disaggregation where feasible. However, WBIF's standard financial architecture is not designed as a GRB tool. Both TA and investment guidance structure budgets through technical cost categories - planning and design, works, supplies, contingencies, and TA packages - with parts of the budget and documentation being auto-structured within MIS workflows. This structure supports procurement readiness and financial control but does not provide a mandatory field or tagging mechanism to identify which share of a grant is explicitly funding gender equality measures (e.g., gender-sensitive design audits, safety interventions, targeted outreach, dedicated training for women, or GBVH prevention and mitigation measures).

As a result, **gender is assessed and reported primarily as a policy and results requirement, while gender-related expenditure cannot be systematically traced through standard WBIF budget tables.** This limitation aligns with the evaluation evidence that gender impacts - where targeted - are often not followed up after completion and that statistical data constraints impede robust socio-

economic attribution. The implication is a structural separation between “gender compliance” and “gender financial accountability”: the system can require gender narratives and, in some cases, sex-disaggregated results, but it cannot reliably evidence what was spent to achieve those outcomes.

## 5.6. POLICY IMPLICATIONS FOR STRENGTHENING GRB WITHIN WBIF

The policy analysis indicates that moving from gender mainstreaming to full **gender-responsive budgeting (GRB)** within WBIF will require reforms at the point where WBIF has the strongest procedural leverage: the **MIS/GAF architecture** and the **standardised appraisal and monitoring templates**. WBIF already has a clear policy basis to assess whether and how gender equality is promoted through screening, additionality narratives, and results expectations; however, these mechanisms are not complemented by a financial accountability layer that would allow **consistent tracking of gender-related expenditures** and systematic linking of those expenditures to results. Without this, WBIF risks continued reliance on qualitative assertions of gender additionality and uneven post-completion evidence, rather than verifiable GRB-informed accountability.

This constraint is not unique to WBIF. Across the broader partner ecosystem, the analysis shows that the institutional partners share the same underlying challenge: strong high-level commitments to gender equality as **social compliance** are weakened in practice by the absence of **mandatory GRB financial tools**. Two policy gaps recur. First, **GRB financial accountability** remains underdeveloped because policies generally do not require a dedicated budget line, tagging system, or mandatory field that can trace spending specifically allocated to gender equality outcomes; AFD/France explicitly acknowledges the need to strengthen GRB traceability, illustrating that this is a recognised deficiency. Second, **gender evaluation and follow-up** is often insufficient: even where results frameworks focus on outcomes, they cannot reliably attribute or verify the financial effort devoted to gender equality in the absence of expenditure tagging, and this is particularly visible in institutions where explicit gender strategies are less developed.

Closing these gaps requires a coherent set of policy measures that align WBIF’s procedural requirements with financial traceability. The first priority is **to mandate GRB financial tools** within WBIF templates and partner practices - most concretely through mandatory gender budget tagging fields (or dedicated budget lines) that enable tracking of spending linked to gender outcomes. In parallel, accountability should be strengthened by adopting a consistent **gender marker/typology approach** and enforcing the integration of **sex-disaggregated data** in implementation monitoring and evaluation, so that outputs and outcomes can be assessed alongside the associated financial inputs. Beyond these core reforms, policy measures should also support higher-impact gender equality pathways that are relevant to climate finance in the Western Balkans, including scaled investment and policy dialogue on the **care economy** (notably for WBG, EBRD and EIB), a more systematic approach to **GBV/GBVH prevention and response** within project design and procurement environments (including relevant policy dialogue), and deeper **fiscal policy integration** to strengthen gender analysis in public finance management and ensure public resources are consistently prioritised toward gender equality outcomes. This would enable a transition from policy-based gender compliance toward financially accountable and measurable gender outcomes across the WBIF portfolio.

## 6. BUDGET ANALYSIS

The Budget Analysis provides an in-depth **micro-level** assessment of the financial dimension of WBIF operations through a **Gender-Responsive Budgeting (GRB)** lens. Its purpose is to determine whether the measures intended to address differentiated user needs (including those of women and vulnerable groups) are supported by **clear, traceable financial allocations**, rather than remaining only as narrative commitments. The analysis reviews the Grant Application Forms (GAFs) and related financial annexes to assess whether gender equality and non-discrimination considerations reflected in the project rationale, additionality narrative, and safeguards sections are translated into identifiable and verifiable budget provisions that can be tracked through planning, implementation, and reporting.

### 6.1. STRUCTURAL IMPEDIMENTS

The findings indicate that WBIF's mandatory budgeting architecture is **not designed to support GRB traceability**. Standard financial templates are structured around functional and technical cost categories - typically works, supplies, technical assistance, and contingencies - which are appropriate for infrastructure implementation but do not enable systematic tracking of spending linked to gender equality outcomes.

A procedural review further confirms the **absence of mandatory GRB tagging fields** within the WBIF budget structure. As a result, it is not possible to verify, from the budgeting documentation alone, what proportion of total project costs is allocated to gender-responsive measures. This creates **financial opacity**, because both "hard" gender-responsive design elements (e.g., lighting, safe access points, universal accessibility features) and "soft" measures (e.g., targeted outreach, training, inclusion actions, gender-sensitive consultations) are typically absorbed into general cost lines and become indistinguishable from core technical expenditures.

This constraint is reinforced by comparison with climate tracking practices: WBIF applies climate-related tagging approaches (e.g., **Rio Markers**) that support an explicit classification of climate relevance. An equivalent, mandatory tagging discipline is **not applied to gender or social objectives**, which means that gender equality remains visible primarily through narrative compliance and results expectations, but **not through financial reporting** - a structural limitation for GRB-informed accountability.

### 6.2. BUDGET ANALYSIS OF SELECTED PROJECTS

The application of the GRB lens to the selected sample reveals a consistent pattern of financial opacity across all project types (Investment Grants, Technical Assistance, and Financial Instruments). As observed across the analyzed projects, budget structures are consistently organized around technical and functional cost categories (e.g. feasibility studies, supervision, civil works, equipment), regardless of the presence of social, environmental, or gender-relevant objectives within the project design.

This results in a structural disconnect between project narratives (which frequently acknowledge differentiated user needs and include elements such as environmental and social assessments, affordability considerations, or inclusion measures), and the corresponding financial documentation, which does not allow these elements to be traced or quantified in budgetary terms.

The following table provides a detailed breakdown of the budgetary structure and the specific GRB findings for **all ten** analyzed projects, highlighting the disconnect between total investment figures and the untraceable nature of gender-specific allocations, as well as the broader gap between project-level social and environmental objectives and their reflection in financial planning.

**TABLE 4: Budget analysis of selected projects**

PROJECT TITLE	SECTOR / INTERVENTION AREA	TOTAL ESTIMATED INVESTMENT	WBIF GRANT CONTRIBUTION	BUDGETARY ALLOCATION STRUCTURE	GRB LENS FINDING
<b>1. Kosovo - Energy Efficiency in Public Buildings Programme</b>	Clean Energy	€ 10,700,000	€ 700,000 (TA Grant)	Combines programme-level investment financing with Technical Assistance components. The available documentation primarily reflects early-stage TA activities, while the broader investment structure is not disaggregated in a way that allows tracing of gender-related allocations.	The project demonstrates clear social relevance, particularly in improving working conditions and public service delivery in central public buildings. However, the budget is entirely structured around technical assistance activities, with no identifiable allocations for gender-responsive measures. Any potential gender-related considerations remain embedded within general technical assistance support and are not traceable within the financial structure.
<b>2. Belgrade Public Transport and Traffic Infrastructure</b>	Sustainable Transport	€ 139,800,000	€ 4,700,000 (TA Grant)	The WBIF grant finances a broad TA package, including feasibility studies, environmental and social assessments, updates to the transport master plan, and targeted capacity building and implementation support for the PMU. Budget allocations are structured around consultancy services and technical deliverables.	The budget includes supervision of works and monitoring of compliance with social standards. However, no amount is explicitly allocated or tagged to verify the cost of gender-specific supervision, safety audits, or design changes.

<b>3. Serbia - Water Supply &amp; Wastewater Treatment (Municipalities VI)</b>	Environment & Climate	€ 100,275,000	€ 2,496,000(TA Grant)	Funds are allocated across both infrastructure components (works and supply) and a detailed Technical Assistance package, including feasibility studies, environmental and social impact assessments, design, and institutional support. Budget lines are clearly structured by technical components.	The budget tracks expenditures across infrastructure and related technical assistance components. It does not track resource allocation based on social equity criteria. There are no disaggregated budget lines to verify gender-responsive allocations, making it difficult to assess how financial resources address differentiated user needs.
<b>4. Mediterranean Corridor (R1/R2): Adriatic - Ionian Highway</b>	Sustainable Transport	€ 190,652,506	€ 35,438,877 (Investment Grant)	The grant co-finances both investment components and technical assistance. Budget allocations are clearly structured across major cost categories, including works, TA for project preparation and implementation, land acquisition, communication and visibility, and contingencies.	While ESIA studies are funded, the budget does not separate the cost of gender-related analysis from general environmental and social studies. It is therefore not possible to isolate how much of the grant was spent on analyzing gendered mobility needs versus technical aspects of the project.
<b>5. Kolasin Biomass District Heating System</b>	Clean Energy	€ 2,400,000	€ 300,000 (TA Grant)	Grant allocation is for the preparation of a feasibility study in line with IFI standards, supporting the development of the investment project.	The budget focuses on assessing financial viability and affordability for end users. However, there are no traceable allocations for gender-responsive measures, and it is not possible to verify how differentiated user needs are considered within the analysis, despite the project's relevance to energy affordability and access.

<b>6. BiH - Regional Sanitary Landfill (Zivinice, Banovici, Kladanj)</b>	Environment & Climate	€ 8,990,000	€ 374,400 (TA Grant)	Funds are used to support supervision of works during the implementation phase through technical assistance, including ensuring compliance with environmental and social standards.	Budget was used to support supervision and implementation activities, including environmental and social aspects. However, financial reporting does not confirm whether specific resources were allocated to address the needs of vulnerable groups. Expenditures related to social aspects are not disaggregated or tagged.
<b>7. North Macedonia - Bogdanci Wind Park Phase 1</b>	Clean Energy	€ 45,000,000	€ 400,000	Budget allocation is focused on feasibility study preparation and tender documentation.	Despite the potential for green jobs, the budget is purely technical. There are no allocations for training women technicians or ensuring gender - equitable procurement, rendering the financial plan gender - blind regarding workforce composition.
<b>8. Albania - REEP Plus (Private Sector)</b>	Clean Energy / Private Sector	€ 34,700,000	€ 4,200,000	Funds flow through Partner Financial Institutions (PFIs) to households and businesses.	Because the funds are pooled, it is impossible to isolate the WBIF grant component attached specifically to loans for women - led households. The financial reporting aggregates all beneficiaries, masking gender - specific flows.
<b>9. Regional - Green Economy Financing Facility II (GEFF II)</b>	Private Sector Development	€ 428,000,000 (Program)	€ 33,000,000 (WBIF Contribution)	The WBIF funds provide "Investment Incentives" (grants) and "Technical Cooperation" (consultant support).	The budget tracking ends at the facility level. The WBIF budget templates do not provide a line item to show how much of the EU's total contribution is specifically budgeted to offset risk for female borrowers vs. male borrowers.
<b>10. BiH - Promotion of Investments in Energy Efficiency (Banking)</b>	Private Sector Development	€ 20,000,000	€ 4,000,000	Funds used for risk sharing and investment grants to de - risk loans for SMEs.	The blending nature makes tracing impossible. There is no "Gender Window" line item in the budget to verify if the €4m grant specifically incentivized loans to women - led businesses or if it supported general portfolio growth.

### 6.3. LIMITATIONS AND TRANSPARENCY GAPS IN BUDGET ANALYSIS

A major constraint on conducting a comprehensive GRB budget analysis is the **systemic limitations in public access to complete project documentation** and the way disclosure is operationalised across the project cycle. In practice, this creates a “black box” effect: even where project narratives refer to gender equality, external reviewers – particularly civil society watchdogs – often cannot independently verify whether those intentions are reflected in concrete, traceable financial allocations.

The ability to perform a GRB-driven budget analysis is directly hampered by **missing, partial, or non-accessible documents** at project level. While the Grant Application Form (GAF) is the core instrument where budgets are presented, the **full and updated GAF package - especially detailed financial annexes with granular cost breakdowns - tends not to be publicly available** in a form that would enable external expenditure tracing. In parallel, key background materials that would substantiate differentiated needs and justify targeted allocations – such as feasibility studies (FS) and **full environmental and social documentation (e.g., ESIA/ESAP and annexes)** – are frequently disclosed only in summary form or are not disclosed at all. This produces a persistent verification gap: executive summaries may state that user needs, inclusion, or gender risks are addressed, but the **budget evidence required to confirm how (and how much)** often remains inaccessible.

This problem is compounded by the **budget architecture itself**. Where gender-responsive measures are included, they are typically embedded within untagged, aggregated lines such as “works,” “supervision,” or “technical assistance,” which means the public record often contains only high-level cost categories. As a result, the GRB question – “Are financial resources explicitly allocated to gender-related activities and outcomes?” – cannot reliably be answered from available documentation. The conclusion is therefore often **“unknown/untraceable”** rather than a verifiable “yes” or “no.” The following table summarizes the availability of key verification documents for the analyzed sample, highlighting the systemic transparency gaps that obstruct GRB auditing.

**TABLE 5: Availability of key verification documents for WBIF projects**

PROJECT NAME	GAF (FULL BUDGET) AVAILABLE?	ESIA / GENDER ANALYSIS AVAILABLE?	GENDER BUDGET TAGGING PRESENT?
<b>Kosovo Energy Efficiency</b>	NO (Restricted)	Partial (Social aspects described / no ESIA or gender analysis available)	NO
<b>Belgrade Public Transport</b>	NO (Restricted)	Partial (Strategic Environmental Assessment referenced / not publicly available in full)	NO
<b>Serbia Water Supply</b>	Partial (Factsheet)	Partial (Social aspects described / no ESIA or gender analysis available)	NO

<b>Mediterranean Corridor (Highway)</b>	NO (Restricted)	NO (Preliminary findings only)	NO
<b>Kolasin District Heating</b>	Partial (Summary)	NO (Feasibility Study internal)	NO
<b>BiH Sanitary Landfill</b>	Partial	Yes (ESIA completed – not publicly available)	NO
<b>North Macedonia Wind Park</b>	Partial	Yes (ESIA available)	NO
<b>Albania REEP Plus</b>	NO (Facility level data only)	N/A (Framework mandated)	NO
<b>Regional GEFF II</b>	NO (Confidential)	N/A (Framework mandated)	NO
<b>BiH Energy Efficiency (Banking)</b>	NO (Confidential)	N/A (Framework mandated)	NO

## 6.4. GRES ANALYSIS ACROSS FRAMEWORK

The methodology for Gender Budget Watchdog (GBW) reports emphasizes that a gender sensitive or gender responsive initiative reflects the application of gender analysis to intervention design, implementation, monitoring and evaluation. This analysis examines how the ten selected WBIF projects integrate the required tools and methods across the four key stages of the project cycle. The overall finding is that the WBIF procedural framework introduces gender-sensitive requirements for Needs Assessment and Monitoring; however, their application remains uneven and dependent on project-level documentation. The implementation and budget phases (Planning/Budgeting) are limited by missing documentation for individual projects and the structural absence of financial allocation tools (Gender Budget Tagging). The following table presents the GRES Analysis: Gender Mainstreaming Across Project Phases.

*Table 1: Needs and gender considerations by sector*

PROJECT NAME (SECTOR)	GRES CLASSIFICATION	NEEDS ASSESSMENT PHASE (APPLICATION OF GENDER ANALYSIS/ ESIA)	PLANNING PHASE (APPLICATION OF GRB/GENDER INDICATORS)	IMPLEMENTATION PHASE (APPLICATION OF EQUITABLE ACCESS/ CAPACITY BUILDING)	MONITORING AND EVALUATION (M&E) PHASE
<b>Kosovo - Energy Efficiency in Central Public Buildings (Clean Energy)</b>	GENDER SENSITIVE	Basic Social Framing: The project includes general social considerations such as improved working conditions, comfort, and equal treatment of users. However, no explicit gender analysis or use of sex-disaggregated data is identified in the available documentation.	Technical Planning: Planning is focused on feasibility studies, energy audits, and identification of cost-effective energy efficiency measures. No gender-responsive budgeting elements or gender-specific indicators are defined.	Technical Implementation: Implementation is limited to technical assistance activities (feasibility study, audits, monitoring). No specific measures are identified to address differentiated needs or outcomes for women or vulnerable groups.	Limited Social Monitoring: Monitoring focuses on technical performance and energy savings. There is no evidence of a requirement for gender-disaggregated indicators or structured gender-responsive monitoring.
<b>Serbia - Belgrade Public Transport &amp; Traffic Infrastructure – Phase 2 (Sustainable Urban Transport)</b>	GENDER BLIND	Limited Evidence: Environmental and social aspects are addressed through Strategic Environmental Assessment (SEA) and related studies. However, no evidence is available to confirm whether the initial analysis included sex-disaggregated data or gender-specific assessments.	Budget Blind: The investment is supported by loans and grant for Supervision of works. No evidence is available that explicit financial resources were allocated for gender-related activities (GRB) or specific gender indicators were set in the planning phase.	Untraceable: Technical assistance covers Supervision of works. It is not possible to verify if the supervision included specific gender mainstreaming tools or checks for equitable employment/ safety standards during implementation.	Untraceable: The M&E phase is blocked because the necessary baseline values and outcomes cannot be publicly accessed or verified.

<p><b>Serbia - Water Supply &amp; Wastewater Treatment in Medium - Sized Municipalities VI (Environment &amp; Climate)</b></p>	<p>GENDER SENSITIVE</p>	<p>Procedural Mandate: The project includes preparation of ESIA studies and socio-economic analysis, with a focus on identifying beneficiaries and assessing affordability and service access. While social aspects are considered, including risks related to gender and vulnerable groups, no explicit gender-specific analysis or use of sex-disaggregated data is identified.</p>	<p>Compliance Check: Planning is aligned with EU environmental and social standards, including general principles of gender equality. However, no specific gender-responsive budgeting elements or gender indicators are defined within the planning framework.</p>	<p>Equitable Access Mandate: The project aims to improve access to water and wastewater services and ensure affordability for end users. While institutional strengthening and capacity building are included, no specific measures are identified to address differentiated access or outcomes for women or vulnerable groups.</p>	<p>Policy Requirement (Tool): The Result Framework includes a limited reference to gender (e.g. women in decision-making positions). However, there is no evidence of a systematic requirement for disaggregated indicators by sex, age or disability. Nor a structured approach to gender-responsive monitoring.</p>
<p><b>Albania &amp; Montenegro - Mediterranean Corridor (TA) (Sustainable Transport)</b></p>	<p>GENDER BLIND</p>	<p>Functional Focus: The project is supported by feasibility studies and ESIA preparation. While early - stage project documentation typically provides limited detail on needs assessment, no explicit gender analysis is identified in the available documentation.</p>	<p>Technical Planning: The planning budget is primarily focused on technical documentation (FS, DD, ESIA). While gender equality may be referenced at the level of additionality, no specific gender-responsive budgeting elements or gender indicators are identified.</p>	<p>Implementation Scope: Implementation focuses on technical preparation and support activities, including studies and supervision. No specific measures are identified to ensure equitable access or provide targeted capacity building for women or vulnerable groups.</p>	<p>Limited Scope: M&amp;E is limited to the Outputs and Outcomes of the Action funded by the TA grant. No gender-specific indicators or disaggregated monitoring framework are identified.</p>

<p><b>Montenegro - Kolasin Biomass District Heating System (Clean Energy)</b></p>	<p>GENDER BLIND</p>	<p>Functional Focus: The TA grant funded the feasibility study. The needs assessment focused on economic and financial viability and market failure.</p>	<p>Budget Blind: The planning budget allocates funds to feasibility study and cost - benefit analysis. There is no evidence that explicit funds were planned for assessing or subsidizing equitable affordability needs.</p>	<p>Limited Scope: Implementation is limited to preparatory technical assistance activities (feasibility study), with no identified measures addressing equitable access or gender-related capacity building.</p>	<p>Limited Scope: M&amp;E is limited to technical deliverables related to the feasibility study and project preparation. There is no evidence of gender-related indicators or structured gender-responsive monitoring.</p>
<p><b>BiH - Regional Sanitary Landfill for Zivinice, Banovici and Kladanj (Environment &amp; Climate)</b></p>	<p>GENDER SENSITIVE</p>	<p>ESIA Application (Analysis Tool): The project includes an Environmental and Social Impact Assessment (ESIA) and is subject to EBRD environmental and social standards. Social aspects, including equitable access to project benefits, are considered, although no explicit gender-specific analysis is identified.</p>	<p>Compliance Planning: Planning requires adherence to the social safeguards and policies ensuring equitable access and compliance with social standards.</p>	<p>Implementation includes supervision of works and project management support. While the need for strengthening institutional capacity is recognized, no specific capacity building measures or gender-targeted actions are defined.</p>	<p>Monitoring Framework: The project includes monitoring by the PMU, beneficiary institutions and EBRD, covering environmental, social and operational performance, including compliance with relevant standards. However, no specific health indicators or gender-disaggregated monitoring framework are defined.</p>
<p><b>North Macedonia - Bogdanci Wind Park Pilot Project (Clean Energy)</b></p>	<p>GENDER BLIND</p>	<p>Assessment Approach: The needs assessment is grounded in technical and feasibility analysis, with a primary focus on energy potential and infrastructure development. While broader social relevance is acknowledged, the gender dimension is not explicitly addressed.</p>	<p>Compliance Check: Planning requires assessing social aspects and guaranteeing equitable access. The Additionality section requires demonstration of impact on gender equality.</p>	<p>Implementation Scope: Implementation of works contracts must abide by IFI rules ensuring non - discrimination. Activities remain technically oriented, without a differentiated approach to users or targeted inclusion measures.</p>	<p>Monitoring Framework: Monitoring arrangements are not elaborated in detail in the available documentation. As a result, the framework does not capture differentiated impacts or enable tracking of gender-related outcomes.</p>

<p><b>Albania - REEP Plus - KfW Programme Implementation (Clean Energy)</b></p>	<p>GENDER SENSITIVE</p>	<p>Sectoral Needs Analysis: REEP policy addresses the need for energy efficiency and renewable energy sources. Support for facilities like healthcare buildings and education addresses practical needs that disproportionately affect women.</p>	<p>Policy Alignment: Planning ensures alignment with the EU pre - accession strategy and Green Agenda objectives.</p>	<p>Intermediated Implementation: Funds are channeled through Partner Financial Institutions (PFIs) (KfW, EBRD). Limitation: The WBIF documentation does not disclose the specific operational tools used by the banks to ensure equitable access.</p>	<p>Mandatory Data: The Result Framework requires indicators to be disaggregated by sex. Limitation: The M&amp;E data is aggregated at the facility level, obscuring the project - specific allocation.</p>
<p><b>Regional - Green Economy Financing Facility II (GEFF II) (Private sector)</b></p>	<p>GENDER RESPONSIVE</p>	<p>Needs Analysis (Gap Identified): The context analysis informed the design of the Growth4All Guarantee Facility to target underserved segments.</p>	<p>GENDER RESPONSIVE Strategy: The planning is driven by the policy objective of financial inclusion and explicitly targets women - led MSMEs.</p>	<p>Targeted Implementation: Implementation involves direct support and technical assistance for capacity building to PFIs to increase finance to targeted segments.</p>	<p>Targeted M&amp;E: The facility is required to track whether it reaches the women - led MSMEs segment. Results must be disaggregated by sex.</p>
<p><b>BiH - Promotion of Investments in EE and RE - Eco Loans Phase I/II (Private sector)</b></p>	<p>GENDER SENSITIVE</p>	<p>Procedural Mandate: The GAF requires justifying the grant amount by considering affordability concerns.</p>	<p>Compliance Planning: Planning ensures compliance with social standards and includes grant components to reduce the cost burden.</p>	<p>Benefit Inclusion: Implementation mechanisms (loans with grant component) ensure equitable access and affordability.</p>	<p>Mandatory Data: M&amp;E must include indicators disaggregated by sex. Limitation: The budget analysis (Cost Breakdown) is GENDER BLIND; there is no evidence of specific tracking of the grant component dedicated to social subsidies.</p>

A The GRES analysis confirms that the WBIF framework effectively results in a maximum classification of **GENDER RESPONSIVE (G2)** across most projects, with **GENDER TRANSFORMATIVE status being highly constrained** due to structural limitations in the financial and procedural policy structure.

*Table 7: GRES classification of WBIF projects*

PROJECT PHASE	GRES SCORE	JUSTIFICATION / GRB FINDING
<b>PHASE 1: Design &amp; Screening</b>	GENDER SENSITIVE	The WBIF Screening Grid and Additionality Justification encourage projects to acknowledge gender differences and inequalities. Most projects successfully identify women as a distinct beneficiary group at this stage.
<b>PHASE 2: Budgeting &amp; Allocation</b>	GENDER BLIND	The GAF Budget templates do not require or allow for gender budget tagging. Resources for gender - specific actions are not separated from general technical costs, rendering the budget blind to the differential impact of spending.
<b>PHASE 3: Implementation</b>	GENDER RESPONSIVE (Potential)	Depending on the IFI (e.g., EBRD's gender mandates), implementation may actively address inequalities (e.g., through internships or safety audits). However, this is outcome - driven, not budget - driven.
<b>PHASE 4: Monitoring &amp; Evaluation</b>	GENDER RESPONSIVE (Limited)	The Results Framework may include sex - disaggregated data for individuals, where relevant. This allows gender-related results to be tracked in some cases, even if the budget was not.
<b>Overall Classification</b>	GENDER RESPONSIVE (Ceiling)	The system addresses inequalities and may track results (Responsive), but lacks the financial architecture to challenge root causes or power structures (Transformative).

The analysis identifies a set of structural constraints that effectively limit the extent to which WBIF-supported actions can be evidenced as **gender-transformative**. While gender equality is referenced through screening, safeguards, and additionality narratives, the WBIF project-cycle architecture does not consistently provide the **financial traceability** and **documentary completeness** required to demonstrate that gender objectives are resourced, implemented, and audited in a GRB-compliant manner. Key limitations include:

- **Absence of a GRB financial policy field (gender budget tagging).**

Achieving a **gender-transformative** standard under GRB-oriented approaches requires verifiable evidence that budget allocations are earmarked for gender outcomes. In WBIF practice, the **GAF budget structure does not include mandatory fields for gender budget tagging**, meaning there is no standardised way to identify or quantify gender-related expenditure at source.

- **Financial opacity within standard cost categories.**

Even where projects include **gender-responsive** elements (e.g., safer public space design, targeted training, outreach, inclusive consultations), related costs are typically absorbed within aggregated lines such as “works” or “technical assistance for project implementation.” This makes the flow of resources to gender measures **untraceable** from available budget documentation and prevents reliable expenditure-based verification.

- **Inconsistent documentation and transparency gaps.**

Independent GRB verification is constrained by the **limited public availability** of key project documents, particularly detailed financial annexes and full safeguard documentation. As a result, external reviewers often cannot substantiate whether gender-related measures were fully designed, costed, and implemented beyond high-level statements.

The same procedural and financial gaps also undermine the execution of gender mainstreaming tools across the WBIF project cycle:

- **PHASE 1 - Needs assessment tools are conditional on document availability.**

Robust gender analysis depends on preparatory documentation (e.g., feasibility studies, ESIA/ESAP and annexes). Where these are missing, incomplete, or inaccessible, the needs assessment is **blocked or reduced to non-verifiable assumptions**.

- **PHASE 2 - Planning tools are weakened by the absence of GRB.**

The most material planning-level constraint is the lack of **Gender-Responsive Budgeting (GRB)** functionality in WBIF budgeting templates. This prevents the systematic translation of identified gender needs into **explicit budget commitments**.

- **PHASE 3 - Implementation tools lack cost traceability.**

Tools such as **gender-sensitive procurement**, contractual requirements, and targeted implementation measures cannot be reliably financially audited because associated costs are typically embedded within untagged “works” or broad supervision/TA categories. This limits accountability for whether implementation choices were resourced and delivered as intended.

- **PHASE 4 - Monitoring and evaluation tools cannot be financially validated.**

While results frameworks may require sex-disaggregated indicators “where relevant and possible,” the absence of transparent budget tagging means financial auditing of gender effectiveness is not feasible. In effect, gender results monitoring operates without a verifiable link to **gender-coded expenditure**, limiting the strength of GRB-informed evaluation.

## 7. IDENTIFIED BARRIERS AND OPPORTUNITIES

### 7.1. POLICY/STRATEGIC BARRIERS TO GRB IMPLEMENTATION

WBIF approaches gender equality as a cross-cutting compliance issue (e.g. through screening criteria and narrative requirements) rather than via a standalone gender strategy. While high-level commitments to gender equality exist, **they have not been translated into mandatory Gender-Responsive Budgeting tools**. The analysis found that WBIF's system does not include a consistent requirement for gender budget tagging or dedicated budget lines to track spending on gender outcomes. This gap is mirrored across its partner institutions: strong policy commitments are **weakened in practice by the absence of obligatory GRB financial tools**, a challenge acknowledged even by leading donors. Two recurring policy-level gaps emerge - **first**, policies do not require the tagging or earmarking of expenditures for gender equality, leaving gender-related activities financially invisible; **second, gender-focused evaluation and follow-up** is often insufficient, making it hard to attribute or verify outcomes due to the lack of expenditure tracking. In essence, WBIF can demand gender narratives and some sex-disaggregated results, but it **cannot reliably evidence what was spent to achieve those outcomes**, creating a structural disconnect between gender policy compliance and actual financial accountability. This disconnect is reflected in the Gender Results Effectiveness Scale (GRES) assessment: WBIF's portfolio generally achieves a **"Gender Responsive"** rating at best - addressing inequalities and tracking results - but falls short of being "Gender Transformative" because the financial architecture to target root causes is missing. Without reform at the policy level, WBIF's gender ambitions risk remaining largely rhetorical, unsupported by the budgeting discipline needed for true GRB. A persistent gap therefore remains between policy-level ambition and budget-level implementation, limiting the credibility of gender commitments.

### 7.2. INSTITUTIONAL/PROCEDURAL BARRIERS

At the procedural level, WBIF's templates and information systems do not systematically include built-in mechanisms to plan or monitor gender-related spending. The Management Information System (MIS) and Grant Application Form (GAF) templates do not include a **mandatory gender budget field or tagging system**. WBIF budgets are structured around broad technical categories - works, supplies, technical assistance, contingencies - which are appropriate for financial control, but **not designed for GRB traceability**. Because there is **no dedicated marker or field to identify the share of a grant funding gender measures**, any resources for gender-responsive actions (e.g. safe design features, outreach to women, training or GBV prevention) are **submerged within general cost lines**. This leads to **financial opacity**: even when projects include gender elements, those costs are indistinguishable from core expenditures and thus untraceable in the budget. By comparison, WBIF does apply climate-related budget tagging (the Rio Markers for climate finance), showing that explicit classification of thematic spending is feasible; however, no

equivalent tagging discipline exists for gender, leaving gender equality visible mainly in narrative reports rather than in financial reporting. This also limits the ability of decision-makers to assess whether gender-related objectives are adequately resourced or to adjust allocations during implementation.

The procedural gap in budgeting is compounded by inconsistent documentation and disclosure practices. Key project documents – detailed budgets, environmental and social assessments, monitoring reports – are often **not publicly available**, which severely constrains independent GRB verification. External stakeholders (including civil society and gender watchdog groups) face **barriers to accessing information needed to trace gender-related spending or results**, an “accountability inversion” that undermines transparency at the national/local level. Internally, WBIF relies on a layered implementation structure involving national authorities and Lead Financial Institutions (LFIs). In practice, the **depth of gender integration varies by LFI** – some partners like the World Bank and EBRD apply robust gender standards or tagging in their own processes, while others do the minimum required. Without a unified WBIF mandate for GRB, these variations mean gender requirements might be treated as a check-box in some projects and more proactively pursued in others. Moreover, what is not explicitly embedded in WBIF’s MIS and templates **cannot be systematically required across the portfolio**, making it difficult to enforce gender budgeting consistently during implementation and monitoring. In sum, WBIF’s institutional procedures currently provide **clear entry points for gender in theory (screening questions, additionality narratives, sex-disaggregated indicators)**, but they lack **the operational hooks – like tagging fields and transparent reporting – to turn those commitments into accountable budgetary action. This limits the extent to which gender commitments can be translated into measurable and accountable outcomes at project level.**

### 7.3. OPERATIONAL (PROJECT-LEVEL) BARRIERS

On the ground, the ability to implement GRB is often constrained by **uneven capacities and practices at the project level**. Many WBIF beneficiary institutions and Project Implementation Units (PIUs) may have limited experience with gender analysis or budgeting. WBIF’s own guidance flags that additional technical assistance may be needed to support project preparation and implementation; **without such support, weaker institutional capacity reduces the likelihood that gender analysis, sex-disaggregated monitoring, or gender-responsive budget tracking will be sustained through implementation**. The result is an asymmetry in execution: projects depend on individual champions or LFI-driven measures for gender inclusiveness, rather than a systematic approach. For example, in infrastructure projects, technical outputs (kilometers of road, megawatts of power, etc.) tend to dominate, while **“service usability and safety”** components that particularly benefit women (like improved lighting) are often under-specified, not separately costed, or not rigorously monitored. Even where a project’s design acknowledges gender disparities or includes promising actions, the **lack of tracking tools means these actions may not receive dedicated funding or follow-up**.

WBIF’s results framework does require sex-disaggregated data for people-centric indicators, but it does so **“where relevant and possible,”** a qualifier that significantly weakens enforcement. In practice, this conditional language creates space for non-reporting – implementing agencies might omit gender-disaggregated data if their own systems are weak, if it’s not mandated by the

lead financier, or if it's deemed too difficult. Indeed, past evaluations note that although some projects aimed for gender impacts, **many did not follow up on these after completion**, making ex-post assessment of gender results unreliable. This indicates a recurring gap between formal requirements and on-the-ground monitoring practice. Without consistent data, even potentially gender-responsive projects cannot demonstrate tangible outcomes for women versus men. Additionally, local stakeholders have limited avenues to hold implementers accountable due to the **scarcity of accessible project-level gender data and reports**. Overall, these operational barriers mean that **gender-responsive intentions often dissipate during execution**: measures may be planned on paper but not budgeted or monitored in a way that ensures they are delivered and effective. The absence of GRB tracking at project level thus undercuts the **feedback loop** needed to learn from successes or address shortcomings in real time. This also reduces the ability to systematically compare project performance or scale up effective gender-responsive practices across the WBIF portfolio. In practice, this weakens the link between planned measures and actual outcomes, reducing the ability to evaluate impact or replicate effective approaches.

## 7.4. KEY OPPORTUNITIES TO STRENGTHEN GRB IN WBIF

Despite these challenges, the WBIF context also offers clear opportunities to embed gender-responsive budgeting more firmly into its processes. Building on policy alignment, procedural improvements, and emerging best practices, WBIF can strengthen GRB as follows:

### • Leverage EU Policy Alignment and Commitments

WBIF operates within the EU's external investment agenda, which increasingly prioritizes gender equality. The EU's **Gender Action Plan III (2020-2025)** sets a target for **85% of all new external actions to contribute to gender equality by 2025**. Aligning WBIF's approach with these commitments provides both impetus and political support for stronger GRB. This means treating gender equality as a core objective in WBIF's climate and infrastructure investments, in line with EU strategies. The new **EU Growth Plan for the Western Balkans** - under which WBIF has become a key channel - also opens a window to mainstream gender from the outset. Notably, WBIF approved the first projects under the **Reform and Growth Facility** in 2025 as part of this Growth Plan. This is a strategic moment to **integrate GRB criteria into project selection, design and reporting** for these new investments, ensuring that the promised economic growth and reform are inclusive. By visibly aligning WBIF's procedures with EU gender policy goals (such as GAP III and the EU's own gender equality strategy), the platform can enhance its credibility and meet donor expectations for gender-responsive outcomes.

### • Institutionalize GRB Tools and Tracking Mechanisms

A top priority is to **embed concrete GRB instruments into WBIF's standard procedures**, closing the procedural gaps identified. This starts with introducing mandatory gender budget tagging or dedicated budget lines in the WBIF application and MIS templates. Just as climate finance in WBIF is tagged and tracked (using the Rio Marker model), a comparable gender marker system should be adopted. In fact, WBIF's partners provide ready models: for instance, the World Bank requires a gender tag in projects (identifying gender gaps, actions, and indicators), and AFD applies the OECD-DAC Gender Equality Policy Marker to score each operation. **Replicating these tools across the WBIF portfolio** would enable

systematic classification of projects by their gender objective (e.g. significant or principal), and tracking of resources allocated to gender results. Strengthening the MIS to include a dropdown or field for "Gender-related Expenditure" would enforce compliance by design - **what gets measured (and required in forms) gets done**. In parallel, WBIF should enforce the integration of **sex-disaggregated data and gender indicators** in monitoring reports for all projects, moving beyond the "where possible" loophole. A consistent GRB tracking and results framework would allow WBIF to link outputs and outcomes with their associated financial inputs, creating true accountability. Over time, these measures would likely raise WBIF's GRES rating ceiling: with financial inputs tagged and monitored, projects could progress from merely gender-responsive towards more **gender-transformative** impact. Importantly, institutionalizing GRB tools does not require starting from scratch - it means **harmonizing existing best practices into WBIF's own system**, thereby standardizing what some progressive financiers already do and uplifting the rest.

#### • Scale Up Promising Practices and Strengthen Gender Integration

The analysis indicates that gender considerations are currently most visible at the level of safeguards, compliance requirements, and general social framing, rather than through explicitly designed, budgeted, and monitored gender interventions. This suggests that opportunities for gender integration exist but remain underutilized.

Going forward, WBIF can strengthen this dimension by ensuring that **gender-relevant measures**, such as inclusive access design, targeted outreach, or safety considerations, **are explicitly defined, costed, and tracked within project documentation**. One practical approach would be the introduction of a concise "gender action plan" section within project proposals, linked to clearly identified resources and indicators.

WBIF's climate-focused investments also offer a dual opportunity to enhance both effectiveness and inclusiveness. Addressing gender gaps has the potential to improve project effectiveness, uptake and sustainability (for example, energy efficiency programs reach more end-users when they address women's access barriers). Successful pilots and practices can be replicated region-wide - if a particular outreach model or safeguard measure worked well in one country, it should be documented and promoted in new WBIF calls. Additionally, **high-impact thematic initiatives** could be pursued by WBIF in alignment with EU priorities: for instance, investing in the **care economy** (e.g. childcare infrastructure or services) can enable women's greater workforce participation in the green economy, and incorporating **GBV/harassment prevention measures** in project procurement and worksites can ensure safer, more inclusive project environments. Emphasizing such gender-smart approaches in WBIF's operational guidelines would help shift the focus from compliance to proactive empowerment and structured gender integration. Finally, collaboration with national gender mechanisms and civil society in the Western Balkans can be an opportunity to strengthen oversight and **build local capacity for GRB**. This would complement WBIF's internal reforms by fostering an external demand for accountability - closing the loop from policy to budgeting to results on the ground.

By addressing above identified systemic, institutional and operational dimensions, WBIF can evolve from its current gender-mainstreaming approach toward a fully **gender-responsive budgeting framework**. The barriers identified - lack of tagging, opaque budgets, uneven capacity, and patchy data - are significant but surmountable. Through policy alignment with the EU's gender equality objectives, procedural enhancements like mandatory gender budget tags and markers,

and the amplification of emerging practices and approaches, the Western Balkans Investment Framework can strengthen its contribution to gender equality. Such changes would help ensure that **gender-responsive commitments are translated into measurable, financed and verifiable outcomes**, making WBIF not only a catalyst for climate and infrastructure development, but also a driver of inclusive and equitable growth in the region.

Overall, these opportunities highlight that the main constraint is not the absence of gender commitments, but the lack of mechanisms to operationalize and finance them consistently.

## 8. CALL TO ACTION FOR CSOS AND DONORS: TURNING WBIF GENDER COMMITMENTS INTO FINANCIAL ACCOUNTABILITY

The analysis demonstrates a consistent structural gap in WBIF's gender architecture: gender equality is treated primarily as a policy and results requirement, while gender-related expenditure remains largely invisible in standard budgeting and reporting. This creates a disconnect between "gender compliance" and "gender financial accountability," because stakeholders cannot reliably verify what financial resources were allocated to achieve gender outcomes when expenditures are absorbed within aggregated lines such as "works" or "technical assistance." This limitation is compounded by uneven disclosure of preparatory and monitoring documentation, which constrains independent verification and weakens accountability across the project cycle. At the same time, the report confirms that WBIF has the technical precedent to fix this gap: climate-related tagging approaches (Rio Markers) already demonstrate that quantifiable classification of thematic spending is feasible, yet no equivalent discipline exists for gender. This structural gap is consistently observed across the analyzed project sample, where gender considerations are present in narrative form but not traceable in financial documentation.

The implication for civil society and donors is clear: **without procedural reforms at the level of the MIS/GAF architecture and monitoring templates, WBIF will remain functionally capped at "gender responsive," while "gender transformative" impact will remain institutionally out of reach.**

### A JOINT AGENDA FOR CSOS AND DONORS

- **Demand mandatory Gender Budget Tagging as the non-negotiable reform**

CSOs and donors should align around one primary ask: amend WBIF Grant Application Form (GAF) budget templates to include a mandatory, quantifiable field that identifies the share of grant resources explicitly allocated to gender equality results. This is the single reform that converts narrative commitments into traceable financial commitments, enabling systematic verification of whether resources were earmarked and spent for gender-responsive measures.

**How donors can act:** embed this requirement as a funding expectation and implementation standard in their WBIF governance engagement and partner dialogue.

**How CSOs can act:** advocate for a "gender marker" equivalent to existing climate tracking practice, and treat the presence/absence of tagging as the key benchmark in public watchdog reporting.

- **Shift "gender additionality" from narrative to quantified commitments**

Where WBIF currently relies on screening questions and narrative justifications, CSOs and donors should jointly insist that gender equality "additionality" be expressed through measurable targets tied to the intervention logic (for example, quantified access outcomes, service usability/safety outcomes, or reductions in time poverty). This strengthens credibility and reduces the space for minimal risk-mitigation interpretations of gender equality.

**How donors can act:** require minimum thresholds for gender outcome indicators in results frameworks for actions classified as gender significant/principal, and expect post-completion follow-up to be systematic rather than optional.

**How CSOs can act:** track whether projects articulate gender outcomes beyond output counts, and publish concise “additionality checks” comparing stated gender claims against measurable indicators and available evidence.

• **Use transparency as an accountability lever: publish what is needed to verify GRB**

Independent GRB verification is currently constrained by limited public availability of detailed budgets, safeguard documentation and monitoring reports. CSOs and donors should treat disclosure as a minimum standard for accountability, not a voluntary good practice.

**How donors can act:** make disclosure of key project documents and financial annexes a standard expectation in partner reporting and oversight.

**How CSOs can act:** institutionalize routine information requests and public transparency scorecards, focusing on whether baseline needs, safeguards, and reporting are available in sufficient depth to verify gender-sensitive claims.

• **Invest in local GRB capability so implementation does not depend on “champions”**

Operational performance is uneven because many beneficiary institutions and PIUs have limited experience with gender analysis and budgeting; projects often depend on individual champions rather than a systematic approach. Donors and CSOs should jointly push for targeted use of technical assistance resources to build sustained GRB competence at implementation level, including practical capacity for sex-disaggregated monitoring and management of high-risk social issues in works contracts.

**How donors can act:** prioritize and fund GRB capacity building through TA windows, tied to clear learning outputs and implementation responsibilities.

**How CSOs can act:** partner with national gender mechanisms and local institutions to support oversight, demand capability-building commitments, and strengthen domestic accountability ecosystems.

## WHY THIS CALL TO ACTION MATTERS?

If CSOs and donors collectively prioritize tagging, quantification, disclosure and capacity, WBIF can “raise its GRES rating ceiling” by making financial inputs traceable and monitorable - enabling projects to move from gender-responsive compliance toward more gender-transformative impact.

This is not a request for an entirely new system; it is a targeted push to harmonize and institutionalize what already works in parts of the WBIF ecosystem and what WBIF already does for climate tracking - so that gender equality commitments are backed by resources, evidence, and verifiable results across the full portfolio.

Ultimately, strengthening gender-responsive budgeting within WBIF is not only a matter of compliance with policy commitments, but also of improving the effectiveness, credibility, and accountability of public investment. Without clear financial traceability, gender equality risks remaining a declarative objective rather than an operational reality across the project portfolio.

*By implementing these procedural and financial reforms, particularly mandatory Gender Budget Tagging, the WBIF can ensure that every Euro allocated is transparently traceable and actively contributes to measurable social equity, thereby fulfilling the strategic mandate to foster a more equitable, safer, and socially cohesive Western Balkans.*

# Gender Budget Watchdog Report of Planned and Executed Funds in the Western Balkan Investment Framework

