Sustainable Finance Progress Framework

Working paper launch

18 September 2026

Agenda

1. Introducing the Sustainable Finance Progress (SFP) framework

- Diana Cardenas Monar, **I4CE**
- Michael König-Sykorova, Frankfurt School

2. Insights from country pilots

- **Brazil**: Viviane Prado & Annelise Vendramini (independent experts)
- **France**: Diana Cárdenas Monar, **I4CE**
- **Germany**: Michael König-Sykorova, Frankfurt School
- **Indonesia**: Via Azlia Widiyadi, CSIS
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3. Next steps

- Diana Cardenas Monar, **I4CE**

4. Moderated discussion and Q&A:

- Moderated by Louise Kessler, **I4CE**

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Why sustainable finance progress in G20 countries matters now

01 THE STAKES ARE RISING

Climate- and nature-related risks are already generating economic, fiscal and human costs — while timely action can strengthen resilience, energy security, health and economic opportunity.

US$2.3tn+ annual disaster-related losses

150m potential jobs in low- and middle-income countries by 2050

UNDRR (2025); World Bank (2025)

02 THE G20 HAS SYSTEMIC LEVERAGE

G20 economies have the economic and financial weight to shape policy, regulation and market practice well beyond their borders.

~85% of global GDP

80% of world trade

Bouattour et al. (2026)

03 A SYSTEM-WIDE VIEW IS NEEDED

There is a need to understand how and where countries are making progress on sustainable finance policy - to drive more rapid cycles of learning, implementation, and ambition.

4 recurring gaps identified

- **Fragmented tracking**
- **Self-assessment**
- **Limited visibility**
- **Weak feedback loops**

SFP Working Paper (2026)

As the urgency to act grows, the G20 has a critical role to play, and an integrated view is needed to understand where progress is happening, where gaps remain, and how the financial system can better support the transition.

A system-wide lens on sustainable finance progress

INTEGRATED

See the whole picture

Bring together commitments, implementation and financial outcomes across policy areas usually tracked separately.

INDEPENDENT

Add an impartial perspective

Complement self-assessment with evidence-based analysis that can support credible dialogue and learning.

The Sustainable Finance Progress (SFP)

Framework and country-level assessment methodology

GRANULAR

Go beyond policy existence

Look at policy quality, implementation and observable financial outcomes.

CONTEXT-SENSITIVE

Comparability with context

Use a common lens while recognising different institutions, transition pathways and stages of progress.

The SFP connects existing evidence and tracking efforts to provide an integrated, independent and context-sensitive view of country progress.

Advancing sustainable transitions through joint action

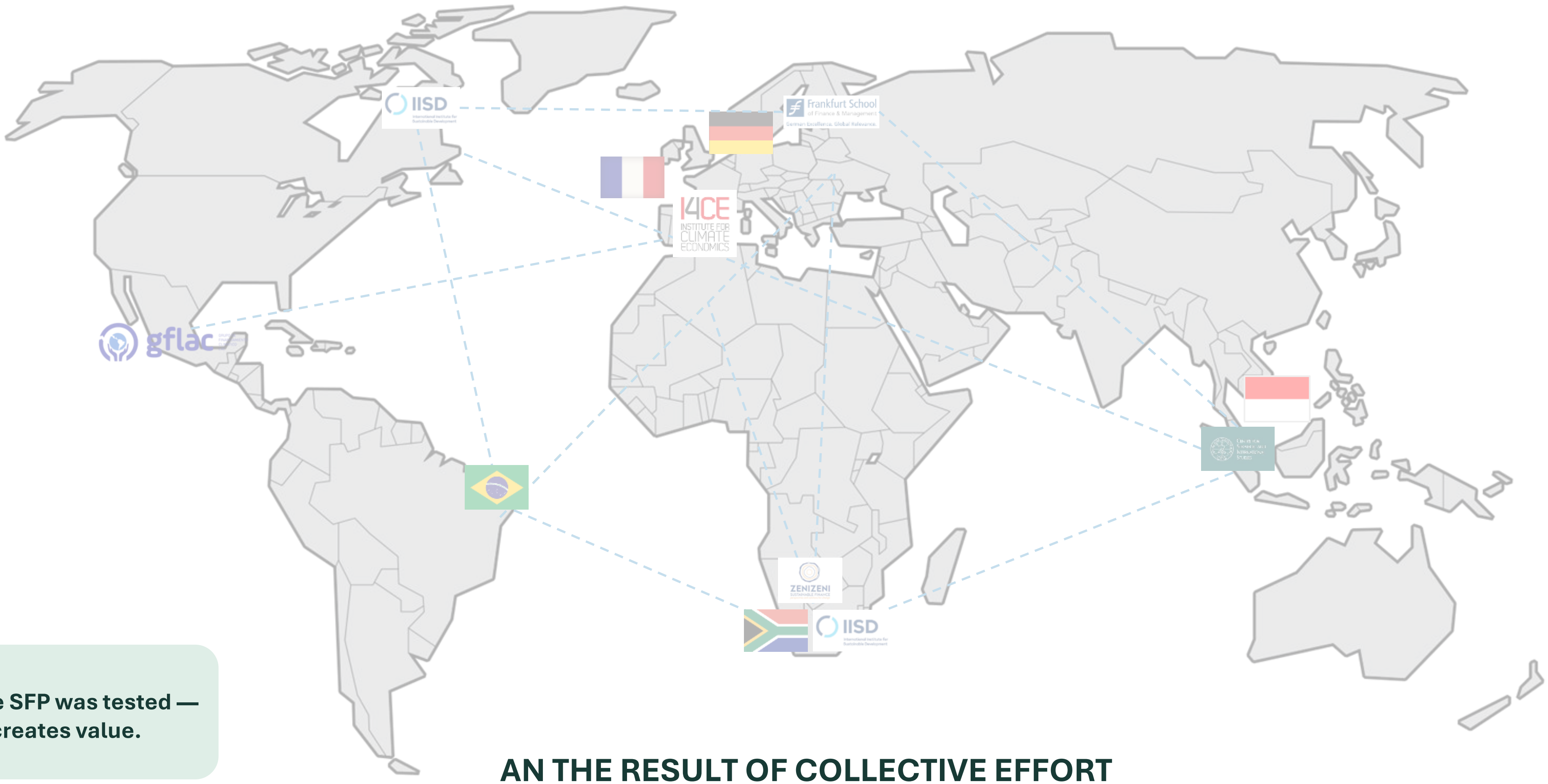
A CATALYST FOR A GLOBAL NETWORK FOR IMPLEMENTATION

CONNECT Bring together existing initiatives, institutions and expertise — complementing ongoing efforts.

LEARN Turn country applications into good practices and peer-learning opportunities that can travel across contexts.

MOBILISE Grow an ecosystem that can use evidence and shared learning to strengthen implementation over time.

Country partnerships are not only how the SFP was tested — they are part of how the framework creates value.



AN THE RESULT OF COLLECTIVE EFFORT

80+	trackers	50+	consultations	4	workshops	5	country pilots	450	comments

From commitments to impact: Theory of change and building blocks

COMMITMENTS

Sustainability objectives integrated in national strategies, plans and laws

IMPLEMENTATION

Action by responsible entities on (action areas):

FINANCIAL STRATEGY AND ALIGNMENT

- FISCAL POLICY AND PUBLIC FINANCE
  Responsible entity: MOF, PDB, ECA...
- MONETARY POLICY AND CENTRAL BANK OPERATIONS
  Responsible entity: Central bank
- FINANCIAL POLICY AND REGULATION
  Responsible entity: Regulators, supervisors, central banks...

OUTCOMES

State of financial flows and stocks

IMPACT

Real economy impact towards the achievement of commitments

* FOCUS FOR COUNTRY-LEVEL ASSESSMENT

From international commitments to domestic plans

Pillar 1. COMMITMENTS

Responsible entities: All government bodies with leadership from Ministries of Environment, Ministries of Foreign Affairs

Sustainable Development Goals	Paris Agreement	Global Biodiversity Framework

- Strategies, plans, and laws
- Governance/institutional arrangements
- Progress tracking/reporting

From economy-wide and sectoral planning to finance

Pillar 2. Action area 1. FINANCIAL STRATEGY & ALIGNMENT

Responsible entities: All government bodies with leadership including Ministries of Finance, Central Banks, Financial Regulators, Supervisors, and Environment Ministries

Financial strategies and plans

- Estimated spending and investment needs
- Investment and financing strategy/plans

Alignment approaches

- Principles for alignment (G20 Sustainable Finance roadmap)
- Sustainable/green finance taxonomies
- International public finance alignment

Role of Ministries of Finance and public investment vehicles

Pillar 2. Action area 2. FISCAL POLICY & PUBLIC FINANCE

Responsible entities: Finance Ministry, Treasury, Public Development Banks, other public investment vehicles and government bodies

Fiscal frameworks and fiscal rules
- Fiscal frameworks
- Fiscal rules

Budgeting
- Budget tagging and tracking
- Public investment guidance tools

Taxes and pricing instruments
- Environmental taxation
- Carbon pricing
- Use of environmental taxation and carbon pricing revenue

Subsidies and other incentives
- Fossil fuel subsidies and other incentives
- Clean energy subsidies
- Subsidies for household affordability

Domestic public investment vehicles
- Development banks
- State-owned enterprises
- Public pension funds
- Special purpose funds

Mobilisation and catalytic finance
- Sovereign bonds
- De-risking mechanisms
- Public-private investment platforms
- Carbon crediting frameworks

International public finance
- Bilateral development finance institutions
- Export credit agencies
- IFIs and MDBs

Role of central banks

Pillar 2. Action area 3. MONETARY POLICY & CENTRAL BANK OPERATIONS

Responsible entities: Central banks

Ambition and transparency

- Strategy & mandate
- Mgmt. of own operational impacts
- Climate disclosure of own balance sheet
- Transition plans of central banks
- Membership in leading industry peer groups

Credit operations

- Green discount rates on loans
- Climate-adjusted collateral frameworks
- Targeted longer-term refinancing
- Mandatory climate disclosure requirements

Securities market interventions

- Green open market operations
- Climate inflation targeting frameworks
- Green foreign exchange reserves management

Macroeconomic analysis and policy framework

- Climate-integrated inflation analysis

Own funds and other non-monetary policy portfolio

- Asset management of non-monetary policy portfolio

Role of regulators, supervisors, and financial authorities

Pillar 2. Action area 4. FINANCIAL POLICY & REGULATION

Responsible entities: Central Banks, financial regulators, supervisors, and other relevant competent authorities

Macroprudential regulation and supervision

- Stress testing and system-wide scenario analysis
- Macroprudential buffers
- Large exposure restrictions (LER) and concentration risk

Microprudential regulation and supervision

- Differentiated prudential capital requirements
- Prudential reporting requirements
- Supervision review process
- Prudential transition plans
- Capacity building & technical assistance

Disclosure and transition plans

- Mandatory climate & sustainability disclosure
- Sustainability data management
- Transition plans (risks & impacts)

Sustainable finance products and instruments

- Sustainable investment products regulation
- Guidelines for sustainable finance instruments and labelled products

Financial market regulation

- Sustainability listing requirements
- Sustainability integration in fiduciary duties
- Sustainability in stewardship codes
- Greenwashing regulation

An integrated view of policy action levers for sustainable finance

Action area		Sub-action area	Indicator — 60+ (statements)		Underlying data points
Commitments		Sustainable Development Goals Paris Agreement Convention on Biological Diversity	• Strategies, plans, and laws • Governance / institutional arrangements • Progress tracking / reporting	Financial outcomes (115)	30
Implementation	Financial strategy & alignment	Financial strategies & plans	Needs estimates | finance strategies...		35
		Alignment approaches	Sustainable finance taxonomies...		
	Fiscal policy & public finance	Fiscal tools & budget management	Budgeting | Taxes | Subsidies...		160
		Mobilisation tools & debt management	PPPs, sovereign bonds...		
		Domestic public investment vehicles	NDBs | SoEs | Pension funds...		
		International public finance	DFIs | ECAs | MDBs...		
	Monetary policy & central bank ops.	Credit operations	Discount rates | Collateral frameworks...		57
		Securities market interventions	Open market operations | FX reserves...		
		Macroeconomic analysis and policy frm.	Climate-integrated inflation analysis		
		Ambition and transparency	Mandates | Transition plans of central banks...		
		Own funds & other (non-monetary)	Non-monetary policy portfolio...		
	Financial policy & regulation	Macroprudential reg. and supervision	Stress testing | Capital adequacy requirements...		105
		Microprudential reg. and supervision	Prudential capital requirements | Transition plans...		
		Disclosure & transition plans	Reporting & disclosure | Sustainability data mgmt...		
		Sust. investment product & instr.	Guidelines for sust. financial products...		
		Financial markets regulation	Greenwashing regulation...		

Example: Assessing progress in the SFP framework

AA3. MONETARY POLICY…
3.1 Ambition and transparency
3.2 Credit operations
3.2.1 Discount rates on loans (incl. targeted refinancing)
3.2.2 Climate-aligned collateral frameworks
3.2.3 Climate-related disclosure requirements for counterparties
3.3 Securities market interventions
3.4 Macroeconomic analysis & policy framework
3.5 Own funds & other non-monetary policy portfolio

3.2.2 Indicator: The central bank incorporates climate, environmental or social considerations into its collateral frameworks by adjusting asset eligibility to reflect sustainability risks

Cascading components		
Policy existence	1. Does the central bank integrate climate, environmental or social risks in its asset pool eligibility for collateral from eligible counterparties?	Yes / No / Partial / Not applicable
Policy quality	2. Does the central bank apply eligibility or concentration limits to assets having adverse climate, environmental or social impacts under its collateral framework?	Yes / No / Partial / Not applicable
Policy outcomes	3a. Does the central bank publicly disclose information related to its climate-adjusted collateral framework including outcomes?	Yes / No / Partial / Not applicable
	3b.Share of total collateral asset pool subject to screening and eligibility requirements for climate, environmental or social risks	# / % / Not available / Not applicable

Coding and aggregation process:

Numeric code (0-1 scale): No = 0 | Partial = 0.25 / 0.5 / 0.75 | Yes = 1 Non-numeric statuses: Not available = absence of data | Not applicable = when an exemption is applied
Aggregation rule: Unweighted arithmetic mean. E.g.: Average score of cascading components = indicator score

Progress scale:

Outstanding: 81-100% | Substantial: 61-80% | Moderate: 41-60% | Emerging: 21-40% | Limited: 0-20%

Process: From theory to policy-relevant insights

Framework

- Academic and practical foundation (G20 SF Roadmap as initial reference)
- Assessment methodology

Data

- Publicly available domestic data
- Existing trackers (OECD, IISD, ASCOR, SBFN, SUSREG, etc.)

Assessment

- Mapping actors
- Assessing policy existence, quality and outcomes
- Qualitative & quantitative indicators

Peer review

- Internal content-related peer review
- External peer review to ensure consistency / coherence

ITERATIVE PROCESS WITH PARTNERS IN PILOT G20 ECONOMIES

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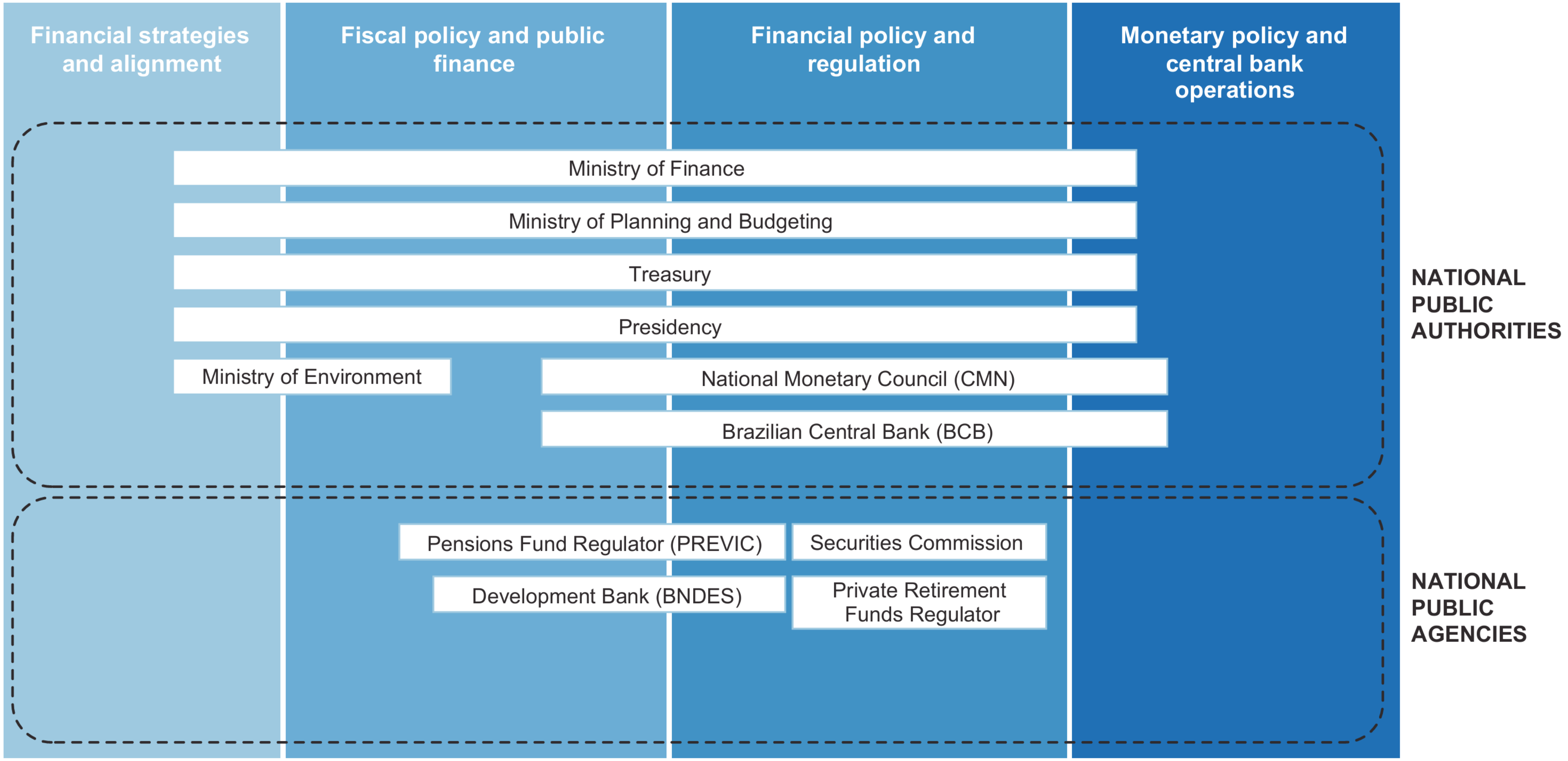
Mapping of key actors in Brazil’s sustainable finance landscape

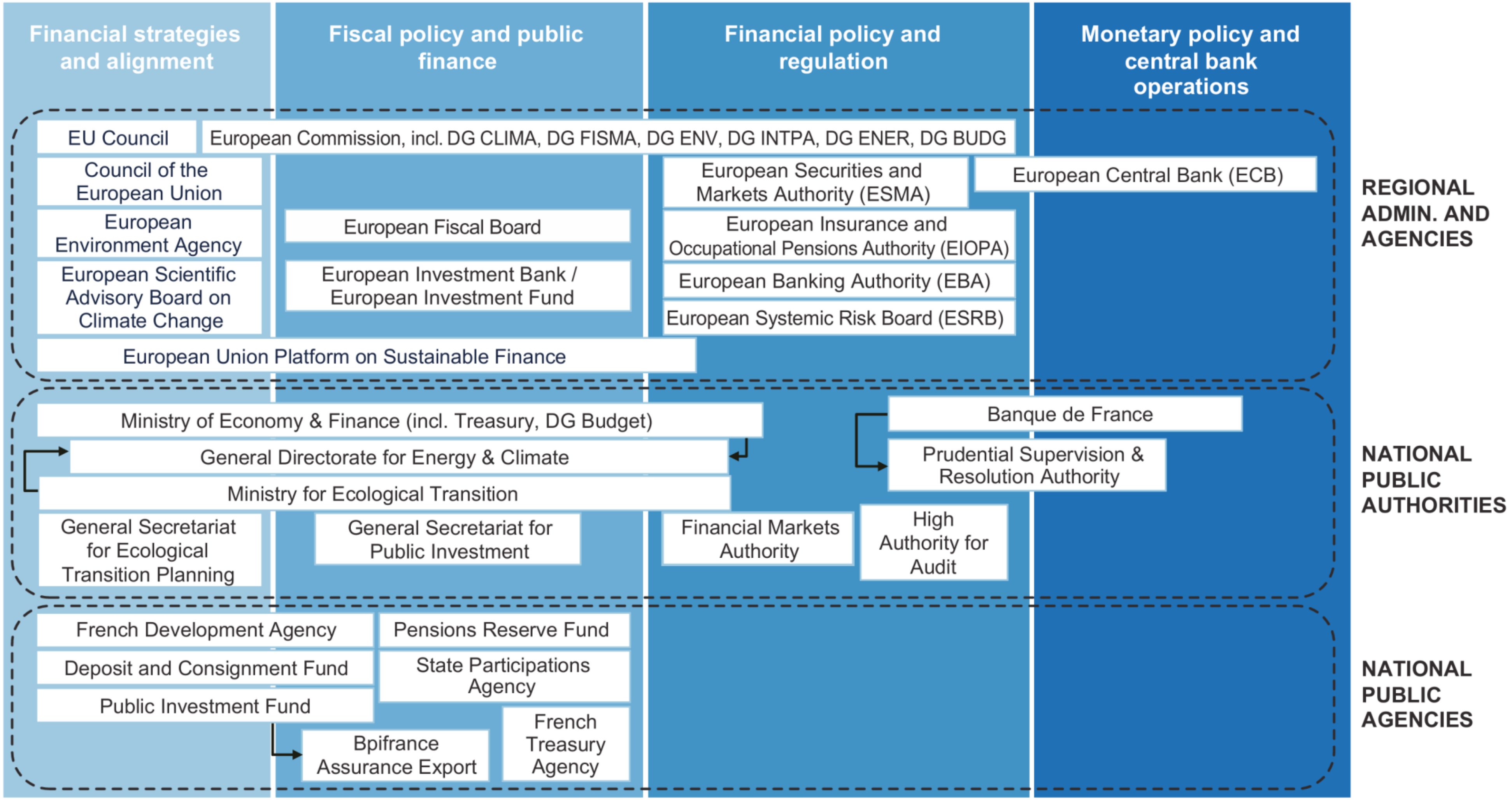


Note: Own illustration. Non-exhaustive. Official names of institutions may change. The pilot tests ended in April 2026, changes that occurred after this date are not included.

Clear ambition and policy advances, but implementation and predictability remain challenges

	GOOD PRACTICES	AREAS FOR IMPROVEMENT
FINANCIAL STRATEGY AND ALIGNMENT	Sustainable finance architecture advancing	Incomplete, time-bound estimates of climate and SDG financing needs and continued debate on fossil fuel phase-out
FISCAL	Issuance of sovereign green bonds and creation of dedicated public–private investment platforms by ministries and public banks, de-risking	Climate and sustainability goals in the tax rules. Carbon market regulation not yet fully operationalised
MONETARY	Progress in greening reserve management → integration of green, social and sustainability bonds into international reserves, supported by public reporting	Limited disclosure of quantitative climate-related exposures in balance sheet operations. No published forward-looking transition plan
FINANCIAL	Integration of climate and environmental risks into prudential *supervision*. Brazil first to mandate ISSB S1 and S2 adoption via securities regulation	No explicit climate-adjusted risk weights or capital buffer differentiation in macroprudential requirements

Mapping of key actors in France’s sustainable finance landscape



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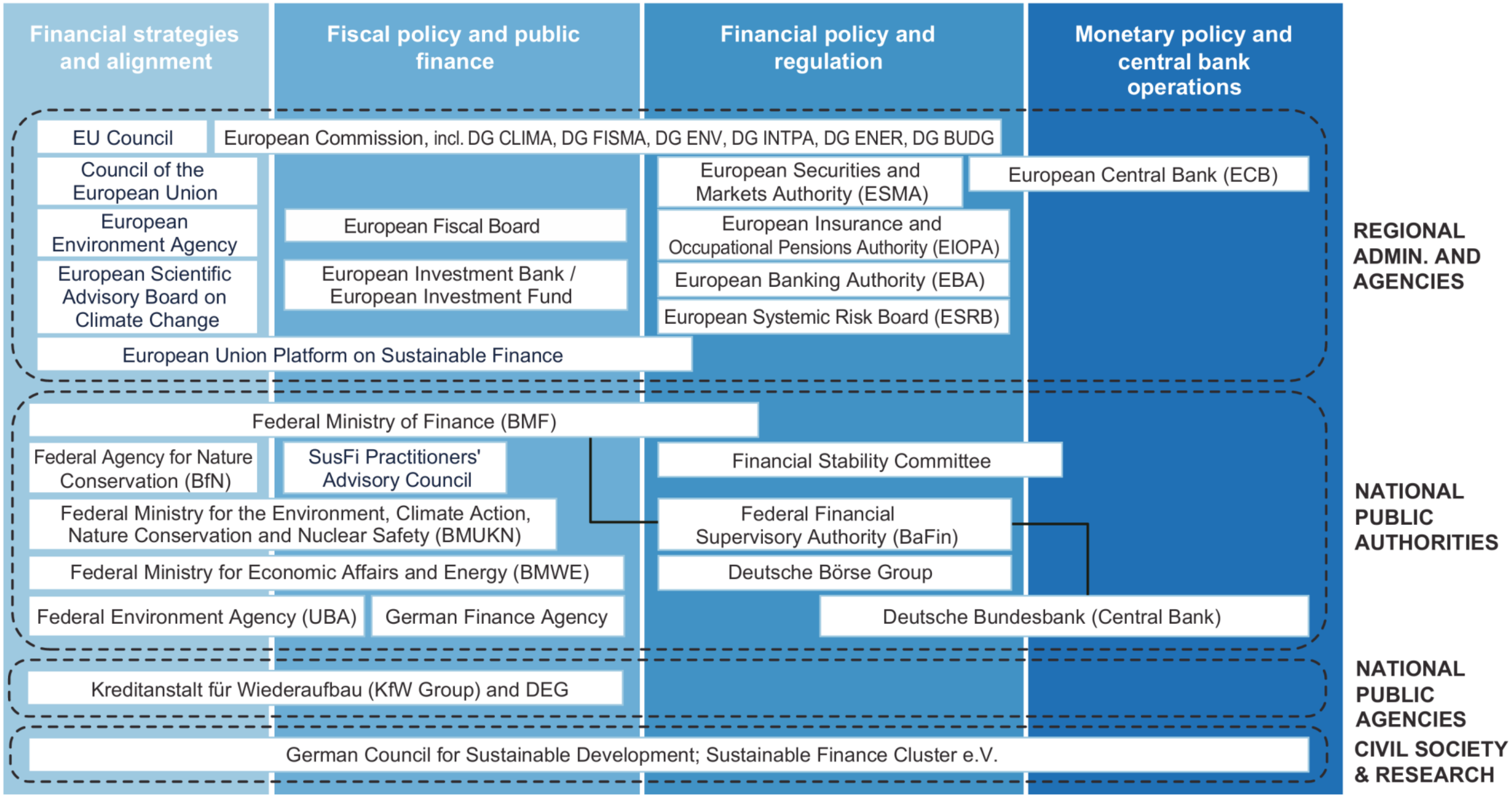
Strong strategic and regulatory progress, but uneven use of fiscal and monetary levers

	GOOD PRACTICES	AREAS FOR IMPROVEMENT
FINANCIAL STRATEGY AND ALIGNMENT	Adopting a multi-year transition financing strategy → *SGPE under prime minister*	The climate investment gap, strategy not binding → *EUR 102B in 2024 (–5% vs 2023)* → *EUR 87B gap relative to needs*
FISCAL	Addressing the affordability of the transition for households → €7.4bn in budgetary and extra-budgetary support in 2023	Improving medium-term visibility to support private sector crowd-in → *Stop and go approach, frailty of policies*
MONETARY	Banque de France's non-monetary portfolios → *1.5°C alignment targets (achieved for equity), fossil-fuel exclusions, biodiversity fund*	Updating central bank's transition plan → *Banque de France's current plan runs only to 2025, need for long-term view (2050 targets).*
FINANCIAL	Climate and nature risk stress tests → *Including with a focus on insurance (ACPR, BdF, ECB)*	Double materiality not yet integrated into the prudential framework → Material financial risks only

Mapping of key actors in Germany’s sustainable finance landscape



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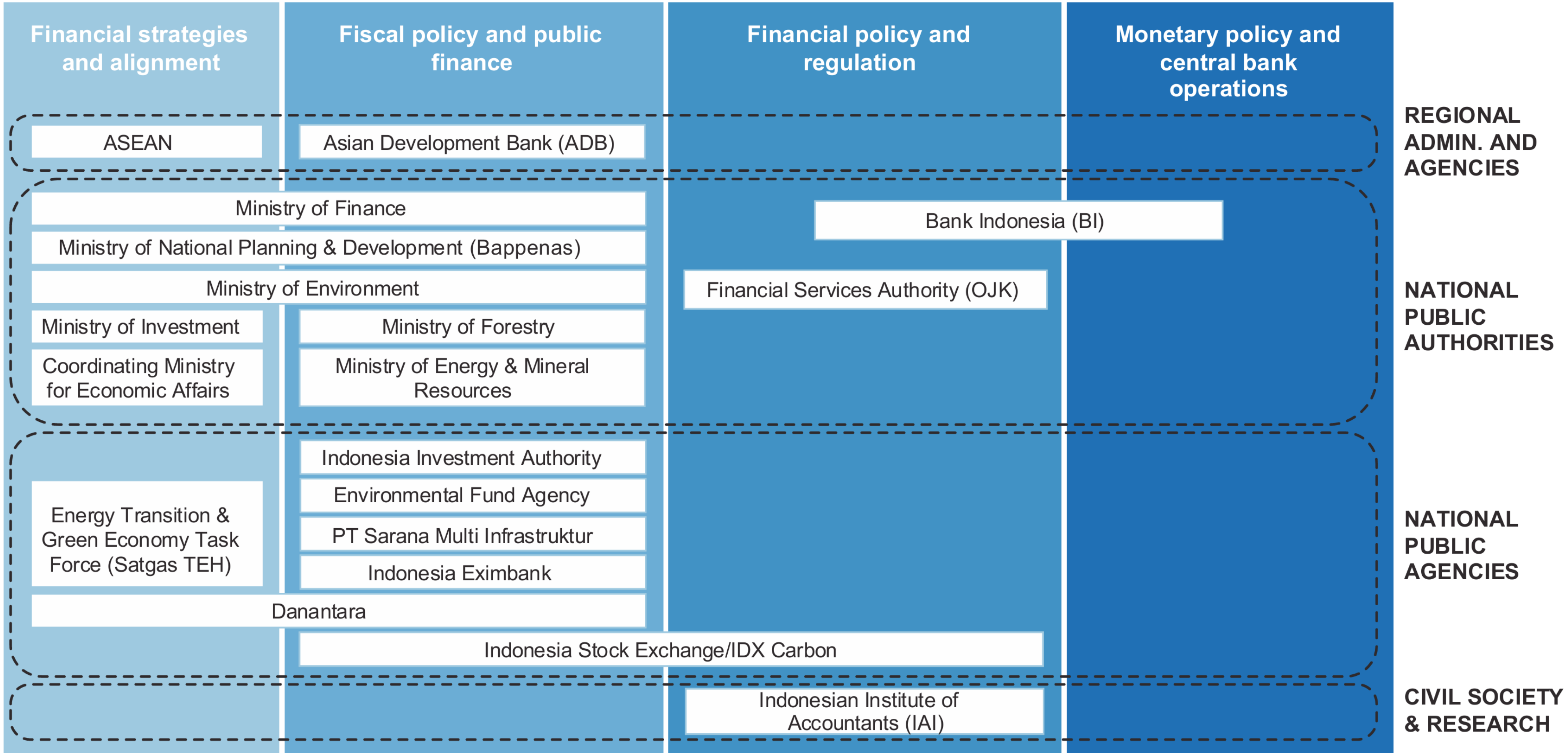
Substantial progress in the creation of an enabling environment

GERMANY

	GOOD PRACTICES	AREAS FOR IMPROVEMENT
FINANCIAL STRATEGY AND ALIGNMENT	Introduction of the German Sustainable Finance Strategy → *Set directions, assign expectations by actor group*	Reduce ambiguity in investment needs → *Estimates for SDG, climate, adaptation, biodiversity*
FISCAL	Driving public sust. Investment → *Climate and Transformation Fund (EUR 212B, 2024-27)*	Improve transparency and tracking of expenses → *CTF to introduce project list and procurement plan*
MONETARY	Bundesbank sustainable investment strategy → *Covering 100% of its non-monetary portfolios, tilting*	Strengthen sustainability criteria in monetary policy: → *Adopt eligibility criteria in collateral frameworks*
FINANCIAL	Guidelines for sustainable investment products → *MoF published a Green Bond Framework in 2020*	Incorporate sustainability risks in prudential frameworks → *Establish concentration limits for harmful sectors*

Mapping of key actors in Indonesia’s sustainable finance landscape



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Strong commitment in place, but limited enforcement and complex institutional arrangements hinder progress

	GOOD PRACTICES	AREAS FOR IMPROVEMENT
FINANCIAL STRATEGY AND ALIGNMENT	Estimated financing needs aligned with intl. standards: *Foundation for SF supported by strong commitments and coherent strategies*	Clearer disclosure on financial needs: *For adaptation; current figures only estimate climate losses*
FISCAL	Climate budget and carbon pricing instruments: Govt climate spending reached USD 31.74B in 2018–2024; Pres. Reg. 110/2025 provides natl. framework for carbon pricing	Better utilization of tax and fiscal incentives: *No env. taxation, carbon tax still in early stage; fiscal incentives rely more on regulatory measures than direct subsidies*
MONETARY	Promote green financing: *BoI has embedded sust. in mandate through NGFS membership, commitment to NDC and TCFD, climate risk stress testing*	Improvement on transparency and public accountability: *Info. regarding central bank's climate commitment progress/implementation is not publicly available*
FINANCIAL	Comprehensive SF guidelines: *OJK has issued guidelines, conducted pilot climate risk stress tests, and required FIs to prepare transition plans and disclose ESG information*	Early-stage implementation: *Microprudential and macroprudential policy is still in the developing stage with limited implementation industry-wide*

Mapping of key actors in South Africa’s sustainable finance landscape

<table>
<tr><th>Financial strategies and alignment</th><th>Fiscal policy and public finance</th><th>Financial policy and regulation</th><th>Monetary policy and central bank operations</th><th></th></tr>
<tr><td>The Presidency</td><td colspan="3">National Treasury</td><td rowspan="6">NATIONAL PUBLIC AUTHORITIES</td></tr>
<tr><td>Presidential Climate Commission</td><td>South African Revenue Service</td><td colspan="2">South African Reserve Bank (SARB)</td></tr>
<tr><td>Dept. of Forestry, Fisheries & Environment</td><td>Financial and Fiscal Commission</td><td>Financial Sector Conduct Authority (FSCA)</td><td></td></tr>
<tr><td>Dept. of Trade, Industry and Competition</td><td></td><td>Financial Intelligence Centre</td><td></td></tr>
<tr><td>Dept. of Electricity and Energy</td><td></td><td></td><td></td></tr>
<tr><td>Dept. of Mineral and Petroleum Resources</td><td></td><td></td><td></td></tr>
<tr><td>Sustainable Finance Initiative</td><td>Development Bank of Southern Africa (DBSA)</td><td></td><td></td><td rowspan="4">NATIONAL PUBLIC AGENCIES AND ENTERPRISES</td></tr>
<tr><td></td><td>Industrial Development Corporation (IDC)</td><td></td><td></td></tr>
<tr><td></td><td>Export Credit Insurance Company</td><td></td><td></td></tr>
<tr><td></td><td>Government Employees Pension Fund</td><td></td><td></td></tr>
<tr><td>Johannesburg Stock Exchange (JSE)</td><td></td><td></td><td></td><td rowspan="3">PRIVATE SECTOR, CIVIL SOCIETY & RESEARCH</td></tr>
<tr><td>National Business Initiative (NBI)</td><td></td><td></td><td></td></tr>
<tr><td>The King Comission</td><td></td><td></td><td></td></tr>
</table>

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Climate: strong commitments but uneven maturity of policies and slow implementation

	GOOD PRACTICES	AREAS FOR IMPROVEMENT
FINANCIAL STRATEGY AND ALIGNMENT	Climate Change Act of 2024 Green Finance Taxonomy	Insufficient finance to fully implement NDC
FISCAL	Public-private investment platforms and Special purpose funds	No plan in place to phase out fossil fuel subsidies
MONETARY	Climate-integrated macroeconomic analysis *Macroeconomic analysis & policy framework*	No climate policy governing central bank's own credit operations
FINANCIAL	Climate-related prudential guidance for banks and insurers Mitigation plan regulations under development	Comprehensive transition plans for financial and non-financial firms are not mandatory

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Working Paper September 2026

THE SUSTAINABLE FINANCE PROGRESS (SFP) FRAMEWORK:
AN INTEGRATED APPROACH TO TRACK EFFORTS IN G20 ECONOMIES

PILOT APPLICATIONS IN BRAZIL, FRANCE, GERMANY, INDONESIA AND SOUTH AFRICA

About this publication: This working paper was developed by an international consortium co-led by the Institute for Climate Economics (I4CE) and Frankfurt School of Finance & Management (Frankfurt School). It presents the Sustainable Finance Progress (SFP) framework and methodology developed and tested through five country pilots covering Brazil, France, Germany, Indonesia, and South Africa. The country pilots were undertaken by I4CE for France; Frankfurt School for Germany; the Centre for Strategic and International Studies (CSIS) for Indonesia; International Institute for Sustainable Development (IISD) and ZeniZeni Sustainable Finance for South Africa; and individual experts for Brazil.

Lead Authors: Diana CÁRDENAS MONAR (I4CE), Michael KÖNIG-SYKOROVA (Frankfurt School), Mathias Herbert GRIMM BERTELLO (Frankfurt School)

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Lessons learned so far and the path ahead

01 **DIVERGING LANDSCAPES**

Different pathways, shared questions

Sustainable finance landscapes differ in institutions, policy mixes and starting points — creating challenges for comparability, but also opportunities for good-practice identification and peer learning.

02 **METHODOLOGICAL JUDGEMENT**

Refine without oversimplifying

Scoring, aggregation, attribution and causality require careful methodological choices. The pilots help identify where common approaches are possible — and where context must remain visible.

03 **THE POLICY–FINANCE BRIDGE**

Move from policy to outcomes and impact

A central challenge is understanding whether and how policy implementation translates into financial outcomes and real economy impact. Persistent data gaps constrain this assessment.

Testing the framework across different country contexts has highlighted both the complexity of tracking progress and where the SFP can add value.

Next steps for the SFP initiative

2026

- Expand country pilots: 5 countries
  Australia, China, South Korea, Türkiye and UK
- Reinforce project infrastructure (data partners, reviewers, country partnerships)
- Consult & plan a communications approach

2027

- Refine country-level assessment methodology
- Roll out assessment to all G20 members
- Deploy communications and media approach in the context of the UK G20

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Guiding questions

- Having seen the SFP approach and pilot experience, what stands out to you as particularly valuable or promising?
- Where do you see the main challenges in applying an integrated approach to tracking sustainable finance progress?
- Where could the SFP add the most value going forward?
- What should we explore or improve as we take the SFP into its next phase?

Thank you

Louise Kessler, I4CE
Diana Cardenas Monar, I4CE
Michael König-Sykorova, FS
Bathandwa Vazi , IISD

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