

## Conclusions

**Framework Operation #59 for the Sustainability Guarantee Product – Portugal  
InvestEU Member State Compartment (capped and/or uncapped Guarantee)**  
INVEU-ICR-0084-2025 - SME Policy Window; Sustainable Infrastructure Policy Window  
(SMEW; SIW)

### Short description of the financing or investment operation and its objectives

Type of Financial - Intermediaries	Financial Intermediaries such as financial institutions providing debt financing directly or indirectly to final recipients meeting at least one of the product eligibility criteria from the Sustainability Guarantee.
Type of the final recipients	Mid-Caps (Small Mid-Caps); SMES; Individuals; Other (housing associations)
Countries of Implementation	Portugal
Implementing Partner	European Investment Fund (EIF)

The Sustainability Guarantee shall contribute to the green and sustainable transformation of the local economy by supporting access to debt financing for eligible final recipients. The purpose of the Sustainability Guarantee shall be to address Portugal's current challenges in supporting investments in green transitioning, energy efficiency and renewable energy production. This Framework Operation is expected to contribute to the objectives set out in Portuguese Recovery and Resilience Plan (RRP), in particular by incentivising private investment and improve access to finance providing financial support via debt financing through intermediaries for the competitiveness of SMEs, and possibly also to support (i) private investments from Small Mid-Caps and individuals and (ii) firms' competitiveness in particular (but not exclusively) by means of investments in the innovation, digitization and/or greening of their activities.

### Global Assessment and rationale for approval

The Investment Committee of the InvestEU Fund approved the use of the InvestEU guarantee on 16 September 2025 for the above-mentioned operation.

### Additionality

Additionality shall be deemed to be met via each Sub-Project as long as financial intermediaries originate final recipient transactions, which carry a higher risk profile than the risk generally deemed acceptable by such intermediary, inter alia:

- In the form of targeting final recipients of lower creditworthiness; or
- Implementing financing solution in line with the enhanced access to finance measures

EIF expects to support financial intermediaries in originating final recipient debt transactions, which meet the enhanced access to finance measures, as described in the InvestEU Call for Expression of Interest published on EIF's website. These measures ensure that the debt financing support provided to target final recipients is made on more favourable terms, compared to the standard credit and collection policies of financial intermediaries. The

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measures include, but are not limited to, improvement in financing tenor, pricing conditions or collateral requirements.

### **Market gap**

The identified main market failures, preventing energy efficiency investments, include notably:

- High commercial interest rates
- Small project sizes resulting in high project development and transaction costs
- Grant dependency - beneficiaries prefer to delay investments waiting for grants to become available
- Low awareness among financial institutions to invest in energy efficiency.

Green lending by financial intermediaries to SMEs and individuals is still at an incipient stage, particularly in Portugal, and is perceived as riskier. Green technologies are typically more expensive and capex intensive (e.g., renewable energies, industrial energy efficiency, etc.) and typically require longer periods of repayment. In addition, green financing comes with additional complexities in terms of assessments and requirements for both the financial intermediaries and final recipients. Consequently, the origination of green financing comes with additional intricacies and therefore is less attractive than financing more established activities.