

Correspondence with the World Bank concerning the 2023 SURCE implementation reports

Introduction

To enable readers to examine the basis for the observations made in our blog, we are publishing selected excerpts from correspondence between RES Foundation and the World Bank concerning the 2023 SURCE implementation reports.

The excerpts below reproduce verbatim the substantive parts of the exchange relevant to the methodology, underlying data, reported climate-mitigation results and quality assurance of the analytical findings. Salutations, signatures and other non-substantive parts of the correspondence have been omitted.

The initial inquiry was addressed by RES Foundation to the World Bank. In its response, the World Bank stated that the methodological overview it provided had been supplied by the Ministry of Mining and Energy as the implementing authority.

The correspondence is published because the issues discussed concern analytical findings from a publicly financed programme and the evidence required for those findings to be independently assessed.

Editorial note: The excerpts are reproduced verbatim. Omissions that are shown are indicated by [...]. No wording has been altered.

RES Foundation to the World Bank — 20 March 2026

Selected excerpt

We have reviewed and analysed with great interest the documents published on the project website (<https://www.cistaenergija.rs/dokumenti/>) related to the 2023 public calls.

The reports contain a significant amount of valuable data, as well as analytical findings and interpretations. We note that the analytical results are currently difficult to independently assess, as neither the underlying methodologies nor the source datasets used for the analysis have been made publicly available.

Given that these findings are likely to inform future public spending decisions in the areas of energy efficiency and climate change mitigation, we believe it is essential to ensure full transparency regarding how these results have been derived.

We were particularly interested in the findings indicating substantial climate change mitigation potential associated with the deployment of more than 2,000 natural gas boilers supported through public funding. These results appear somewhat counterintuitive when considered in the context of the existing structure of household heating in Serbia, as documented in census and other official statistics. For this reason, a clearer understanding of the assumptions and calculation methods used would be especially valuable.

In this context, we would like to kindly ask whether the World Bank could ensure the publication of:

- the methodologies and assumptions used in preparing the implementation reports; and (or)
- the underlying (e.g. Excel-based) datasets on implemented measures.

We believe that making this information publicly available and easily accessible for everyone interested would significantly contribute to evidence-based policy development and enable broader engagement. It would also support collective learning at a time when decisions on energy efficiency and energy mix are increasingly important for [security](#), energy security, poverty reduction and sustainable development.

We would greatly appreciate consideration of this request by the World Bank. We remain available for any further discussion with the World Bank colleagues.

World Bank response — 4 April 2026

Selected excerpt

Thank you for your email and for continued interest in the SURCE Project. We welcome engagement from civil society organizations working on energy efficiency and climate policy, and we appreciate the analytical attention you have given to the published implementation reports. We are sharing below an overview of the methodology applied in the Project, provided by the Ministry of Mining and Energy as the implementing authority.

Methodology

Calculations follow the Rulebook on the Methodology for Calculating Energy Savings Resulting from Implemented Energy Efficiency Measures (Official Gazette of the Republic of Serbia, No. 20/23, March 10, 2023). The Rulebook prescribes the bottom-up calculation procedure for each energy renovation measure and has been applied since January 1, 2024. Other relevant national regulations include:

- Rulebook on Conversion Factors for Final Energy into Primary Energy and Carbon Dioxide Emission Factors,
- Rulebook on the Methodology for Calculating Heating Degree Days and Cooling Degree Days
- Rulebook on the Energy Efficiency of Buildings and the Rulebook on the Conditions, Content and Method of Issuing Energy Performance Certificates for Buildings

In practical terms, inputs provided by local commissions — including the actually heated area of the household, the existing and new heat source and fuel type, and the area and type of installed insulation and windows — are entered into the prescribed formulas to estimate annual final and primary energy savings, as well as the associated reduction of CO2 emissions, for each renovated household.

Data collection and iterative improvements

Data on buildings and implemented energy renovation measures are submitted by representatives of local commissions implementing the Project at the local level. The dataset covers each building's existing condition and heating system, as well as the details of the implemented renovation, such as insulation and window area, capacity and characteristics of the new heat source, and solar panels. The Project Implementation Unit regularly collect and analyzes energy savings data and modifies the reporting requirements to increase the quality of collected data. For example, based on the data obtained from the 2023 public call, modification to data disclosure were made in the subsequent call requiring households to record the actually

heated area and submit data on actual fuel/energy consumption for three consecutive years after the EE intervention is completed.

On the findings related to natural gas boilers

We note your observation regarding the climate mitigation results associated with the deployment of natural gas boilers supported through the 2023 public calls. The CO₂ savings attributed to these installations reflect the replacement of less efficient or higher-emission solid fuel heating systems — predominantly wood and to some minor extent coal — which remain prevalent in the Serbian household heating mix. In this context, a transition to a more efficient gas boiler can yield a measurable reduction in CO₂ emissions relative to the baseline, even if natural gas remains a fossil fuel. We recognize this finding may appear counterintuitive without that baseline context, and we believe it merits clearer communication in future reporting.

On transparency and data access

We acknowledge your request for publication of the underlying methodological documentation and datasets. The methodology is based on the publicly available rulebooks, referenced above, which set out the calculation framework in full detail. With respect to the underlying project datasets, we will raise your request with the Ministry and revert to you on the feasibility and modalities of making additional information available. We are supportive of transparency measures that strengthen the evidence base for energy efficiency policy in Serbia.

RES Foundation follow-up — 4 April 2026

Selected excerpt

Thank you for your response and for sharing the additional information.

Your explanation confirms that wood-based fuels were dominant in the baseline mix, as stated: “The CO₂ savings attributed to these installations reflect the replacement of less efficient or higher-emission solid fuel heating systems, **predominantly wood and to some minor extent coal**, which remain prevalent in the Serbian household heating mix.”

In this regard, we would like to highlight that the mentioned *Rulebook on Conversion Factors for Final Energy into Primary Energy and Carbon Dioxide Emission Factors* correctly **assigns a CO₂ emission factor of zero (0) to wood-based fuels**. This is precisely why the reported scale of mitigation effects associated with the deployment of natural gas boilers appears counterintuitive and warrants further examination.

[...] To clarify our position, our inquiry is not directed toward the implementing authority, nor are we seeking any additional explanations from it. Rather, our interest lies in understanding whether and how the World Bank ensures quality assurance of the analytical outputs presented in the implementation reports.

Given the importance of these findings for informing future public spending and policy decisions, we believe that an independent quality assurance mechanism for the assessment of the project outcomes [...] is essential for ensuring robustness, credibility, and usefulness of the analytical results.

We also wish to clarify that our intention is not to request formal or informal responses, but to contribute to improving the quality of collective learning. At a time when decisions on energy efficiency and energy mix are increasingly critical for security, energy security, poverty reduction, and sustainable development, ensuring a strong and transparent evidence base is of shared interest. We hope to be able to find such evidence base together with all interested stakeholders easily accessible in the public domain