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Environmental and Social Data Sheet

Overview			
Project Name:	PANNONIA SOLAR ENERGY		
Project Number:	2023-0290		
Country:	Austria		
Project Description:	Implementation and operation of 6 ground-based agri-PV installations with a total installed capacity of ca. 257 MWp and a battery energy storage system in Burgenland, Austria		
EIA required:	No		
Project included in Carbon Foot	print Exercise ¹ : yes		
(details for projects included are provided in section: "EIB Carbon Footprint Exercise")			

Environmental and Social Assessment

Environmental Assessment

The project concerns the implementation and operation of six ground-based solar PV installations with an estimated total installed capacity of ca. 257 MWp. The project also contains the implementation and operation of a containerised battery energy storage system (BESS, ca. 4.1 MW/ 8.6 MWh) at the site of project scheme Nickelsdorf II. All project schemes will be connected to existing grid connections of operating wind farms.

Installed capacity data for project schemes other than Nickelsdorf I and Nickelsdorf II are still provisional at the time of appraisal.

Project scheme	Installed capacity (MWp)	Co-utilisation of project area	
Nickelsdorf I	14.3	Co-utilisation of land in the form of sheep	
		grazing	
Nickelsdorf II	68.1	Co-utilisation of land in the form of shee	
		grazing	
Parndorf	38.7	Co-utilisation of land in the form of sheep	
		grazing	
Gattendorf	33.6	Use of solar modules with trackers,	
		Agricultural co-utilisation of land	
Mönchhof Nord	41.9	Use of solar modules with trackers,	
		Agricultural co-utilisation of land	
Mönchhof Süd 60.8 Use of s		Use of solar modules with trackers,	
		Agricultural co-utilisation of land	

At the time of appraisal, solar PV plant Nickelsdorf I has finalised construction and become fully operational whilst solar plant Nickelsdorf II has started construction. The other project schemes shall be implemented by the end of 2025.

¹ Only projects that meet the scope of the Carbon Footprint Exercise, as defined in the EIB Carbon Footprint Methodologies, are included, provided estimated emissions exceed the methodology thresholds: 20,000 tonnes CO2e/year absolute (gross) or 20,000 tonnes CO2e/year relative (net) – both increases and savings.

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In-line with Regulation EAG-Marktprämienverordnung (2022), all solar PV plants are developed as Agri-PV installations. This means, amongst others, that at least 75% of the project sites will be co-utilised for both, power generation and agricultural activity.

All project sites are located inside zones for the development of ground-based solar PV installations, as defined under the amended spatial planning act of Burgenland from 2022. The zones were identified following a Strategic Environmental Assessment in-line with SEA Directive 2001/42/EG, covering aspects such as biodiversity (flora, fauna), people, soil and land use, landscape and cultural heritage, water, air, and climate. The zoning decision obliges promoters to implement site-specific measures to mitigate environmental and land use conflicts, and to pursue environmental monitoring. For some zones (here: Gattendorf, Mönchhof Nord and Mönchhof Süd), Agri-PV in combination with crop production is mandatory. Compliance with these criteria is a precondition to obtain the final permit.

Solar PV installations fall under Annex II of the EIA Directive 2011/92/EU (as amended by Directive 2014/52/EU). It is therefore up to the Member State's competent authority to judge whether an individual project requires an EIA or not, based on criteria defined in Annex III of the EIA Directive. According to the relevant national Act (UVP Act, 2000, as amended), solar PV installations are not subject to an EIA process and as such, do not undergo an EIA screening. The project schemes connect via cables to existing grid connection infrastructure, which are already permitted. Neither the cables nor the BESS are subject to an EIA.

Each project scheme undergoes a combined authorisation process under both, the electricity act of Burgenland (Burgenländisches Elektrizitätswesengesetz) and the nature conservation act of Burgenland (Burgenländisches Naturschutz- und Landschaftspflegegesetz), respectively, with the federal administration of Burgenland being the competent authority.

Given the characteristics of the project schemes, potential environmental and social risks may in particular relate to health and safety (for humans and animals), impacts on vulnerable species as per IUCN Red List (e.g. common hamster, steppe mouse), and visual impacts.

All project schemes are located outside but in the vicinity of Natura 2000 sites. Minimum distances to nearest Natura 2000 site are shown below. Distances are estimated for four out of the six schemes, for which no permitting documentation is in place yet.

Solar PV plant	Closest Natura 2000 sites	Minimum distance in km (ca.)
Nickelsdorf I	SPA "Parndorfer Platte – Heideboden" (AT1125129)	0.2
	SCI&SAC "Nickelsdorfer Haidel" (AT11011120)	3.3
	SCI&SAC "Zurndorfer Eichenwald und Hutweide"	4.1
	(AT1102112)	
Nickelsdorf II	SPA "Parndorfer Platte – Heideboden" (AT1125129)	0.1
	SCI&SAC "Nickelsdorfer Haidel" (AT11011120)	2.8
	SCI&SAC "Zurndorfer Eichenwald und Hutweide"	3.3
	(AT1102112)	
Gattendorf	SCI&SAC "Feuchte Ebene – Leithaauen" (AT1220000)	0-1
	SCI "Burgenländische Leithaauen" (AT1127119)	0-1
	SPA "Parndorfer Platte – Heideboden" (AT1125129)	2-3
Parndorf	SPA "Parndorfer Platte – Heideboden" (AT1125129)	1-2
	SCI&SAC "Neusiedler See - Nordöstliches Leithagebirge"	1-3
	(AT1110137)	
Mönchhof Nord	SPA "Parndorfer Platte – Heideboden" (AT1125129)	1-2
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Mönchhof Süd	SPA "Parndorfer Platte – Heideboden" (AT1125129)	3-4
	SPA "Mosoni-sík" (HUFH10004)	4-6

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At the time of appraisal, solar PV plants Nickelsdorf I and Nickelsdorf II are fully consented. Final permits were issued in July 2022 and January 2024, respectively. Appropriate Assessments in line with 6.3 of the Habitats Directive have been conducted for both installations. The available studies conclude that the solar PV plants including their grid connections are not expected to have any adverse effects on the integrity of Natura 2000 sites. They also conclude that post mitigation, the solar PV plants don't have negative impacts on species under Annex IV of the Habitats Directive or Annex I of the Bird Directive, respectively. The final permits contain explicit statements of the authorities that confirm these findings. They are conditional to the implementation of mitigation and monitoring measures. The other solar PV plants are at earlier permitting stages. A corresponding loan condition is proposed.

A permit for the construction and operation of the BESS under both, electricity act and nature conservation act of Burgenland, was issued in February 2024. The permit is conditional to the implementation of mitigation measures. It confirms that the project has no significant residual negative impacts post mitigation but indicates that a separate consent may be required from the water authorities ("Wasserrechtliche Genehmigung"). Such consent is still pending at the time of appraisal. A corresponding loan condition is proposed.

The project has been assessed for Paris alignment and is considered to be aligned both against low carbon and resilience goals against the policies set out in the Climate Bank Roadmap and the Bank's Energy Lending Policy.

EIB Carbon Footprint Exercise

The direct CO₂ equivalent emissions of the plants under this operation are negligible.

In accordance with the Bank's current Carbon Footprint methodology it is calculated that based on the avoidance of electricity generation from a combination of existing and new power plants in Austria (combined margin for intermittent electricity generation), the total relative effect of the project is a net reduction in CO2 equivalent emissions by 60 kt CO2e/yr.

For the annual accounting purposes of the EIB Carbon Footprint, the project emissions will be prorated according to the EIB lending amount signed in that year, as a proportion of project cost.

EIB Paris Alignment for Counterparties (PATH) Framework

The borrowers are expected to be two Special Purpose Vehicles (SPVs), with one of them being fully owned by the promoter's parent company (five solar PV plants incl. BESS), and the other one (solar PV plant Gattendorf) co-owned by the promoter's parent company and a third party (minority shareholder). Co-owned SPVs are out of scope of the PATH framework.

The promoter's parent is in scope but screened out of the PATH framework, because it is neither considered high emitting nor of high vulnerability.

Public Consultation and Stakeholder Engagement

The promoter applies a pro-active communication and stakeholder engagement approach. Relevant stakeholders such as landowners and municipalities are informed and consulted early on in the project development process. Third parties can contact project managers directly as well as service staff at the head-quarters through established communication channels.

No legal appeals are pending against the project at the time of appraisal.

Other Environmental and Social Aspects

The promoter is experienced in implementing and operating wind farms in Austria. It is known to the Bank from operations PUESPOEK WIND POWER (2010-0481) and PANNONIA ONSHORE WIND (2018-0827).

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The promoter is deemed to have a good environmental and social management capacity for the implementation and operation of the present project.

Each plant is subject to environment, health and safety management and control, in-line with national law requirements.

Recent reports are pointing out the possibility of use of forced labour in the supply chain of solar PV panels. The promoter is required to make reasonable efforts to assess and address the labour risks associated with the supply of the PV panels eventually selected for the project, including throughout the supply chain, as required by the EIB E&S Standards.

For one scheme, procurement was already completed before the Bank became involved. The selected solar PV module suppliers has committed itself to ensuring that there is no forced labour in its supply chains or in any part of its business. A comprehensive set of policies and statements have been provided. For the other five schemes, suppliers have not yet been selected. The promoter has put in place a code of conduct which rejects any form of forced labour. It requires contractors to ensure that there is no use of forced labour in their supply chains and to provide supporting documentation at project level. Loan conditions have been proposed to support the ongoing supply chain due diligence of the promoter.

Conclusions and Recommendations

The project is deeme acceptable for Bank financing under environmental and social aspects. subject to the below loan conditions:

- Prior to disbursement to any individual solar PV plant, the promoter will provide to the Bank the corresponding Appropriate Assessment study (Naturschutzfachliches Gutachten) and the final permit .
- The project shall comply with the applicable provisions of the relevant labour standard of the Bank, which foresees zero tolerance for the use of forced labour.
- The promoter shall make reasonable efforts to carry out a due diligence throughout its supply chains, with the aim of avoiding the use of forced labour in the supply chains of the solar panels that will be used for the respective project to be financed by the Bank. The relevant documentation shall be delivered to the EIB prior to disbursement to the individual solar PV schemes.
- Prior to disbursement to the BESS, the promoter will provide to the Bank the corresponding approval under water law "Wasserrechtliche Genehmigung", if applicable.