European Investment Bank

Luxembourg, 9th October 2023

Environmental and Social Data Sheet

Overview

Project Name:	CEDILLO ALLOCATION GREEN ENERGY FL 2022-0085
Project Number:	2023-0045
Country:	Spain
Project Description:	Financing of Cedillo (375 MW), Velilla (350 MW), Ciudad Rodrigo (304 MW), Peñaflor (136.5 MW) solar photovoltaic projects and of the Iglesias onshore wind farm (70.4 MW) in Spain. Second allocation under the framework loan (FL) 2022-0085 IBERDROLA GREEN ENERGY FRAMEWORK LOAN II

EIA required: yes

Project included in Carbon Footprint Exercise[1]: yes

(details for projects included are provided in section: "EIB Carbon Footprint Exercise")

Environmental and Social Assessment

Environmental Assessment

The project is an allocation under the operation IBERDROLA GREEN ENERGY FRAMEWORK LOAN II (2022-0085). It consists of the construction and operation of the solar photovoltaic (PV) plants Cedillo, Velilla, Ciudad Rodrigo and Peñaflor and the Iglesias onshore wind farm, including their ancillary facilities where required, such as power evacuation system or access roads. Further details on the projects are provided in the table below.

Projects	Technology	Capacity [MWp]	Province	Municipality
Cedillo	Solar PV	375	Cáceres	Cedillo, Herrera de Alcántara
Velilla	Solar PV, single axis tracker	350	Palencia	Villalba de Guardo, Mantinos, Guardo, Velilla del Río Carrión
Ciudad Rodrigo	Solar PV	304	Salamanca	Ciudad Rodrigo
Peñaflor	Solar PV, single axis tracker	136.5	Zaragoza	Alfajarín
Iglesias	Wind, onshore	70.4	Burgos	Iglesias, Hontanas, Tamarón, Los Balbases, Estépar, Rabé de las Calzadas, Tardajos, San Mamés de Burgos y Villalbilla de Burgos

[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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The solar PV plants, the wind farm and the related grid connecting infrastructures fall under Annex II of the EIA Directive 2014/52 (amending Directive 2011/92/EU) and have been screened in by the competent authority, requiring full Environmental Impact Assessment (EIA).

The EIAs are covering the entire lifecycle (construction, operation and decommissioning) of the plants and the related auxiliary facilities. Potential impacts on the physical environment (air, water, soil), flora and fauna, cultural heritage, protected areas, landscape and socio-economic environment have been assessed, taking into account also the cumulative impacts together with nearby infrastructure and/or neighbouring plants.

The assessments were carried out specifically for each project, however, there are typical impacts common to all projects. During the construction phase the main impacts are associated to earth works and removal of the vegetation cover, such as destruction of habitats, fatalities of species, soil erosion, GHG emissions, dust and noise, deterioration of ground and surface water quality or visual impact. Main impacts expected during the operation of the PV plants are the fragmentation of habitats, reduction of feeding and hunting grounds, collision and electrocution of birds or bats with the transmission lines and visual impact. In case of the wind farm, another relevant impact is the risk of bird or bat collision with the rotor. Decommissioning entails temporary negative impact, similar to the construction. Waste produced during construction and decommissioning is classified following the European List of Waste. Waste electrical and electronic equipment Directive ((Directive 2018/849 amending Directive 2012/19/EU) is transposed by national law (RD 110/2015 amended by RD 27/2021). The promoter will have to present a decommissioning plan to the competent authority in advance of the planned end of the activities.

The EIAs are based on desk studies and on-site investigations, with the study areas significantly exceeding the borders of the project areas, applying the radius as recommended by the authorities for the respective target species. The EIAs including the related field studies are considered acceptable in terms of applied methodologies and completeness.

For all projects under this allocation including their associated infrastructure, the environmental permit (Declaración de Impacto Ambiental - DIA) has been issued by the Directorate General for Quality and Environmental Assessment (under the Ministry for Ecological Transition) taking into account the technical information, the EIA report (including additional specific studies) as well as the consultations with the concerned regional authorities, NGOs and public. The DIAs are the prerequisite for the final authorisations (i.e. building and operating permits) establishing the environmental terms and conditions, the projects need to comply with, and defining all preventive, corrective and compensation measures to be implemented throughout all project phases.

Typical mitigation measures common to all projects under this allocation are:

- Applying best environmental practices during construction to avoid dust, GHG and noise emission
- Waste management in line with national law provision
- Collection and treatment of wastewater
- Construction works not to start during the reproductive season
- Overhead lines need to be marked to reduce avifauna and bat collision risk
- Minimising the removal of vegetation and topsoil (where required, the removed topsoil shall be kept and used for restoring the area after construction)
- Use of existing roads and infrastructure wherever possible
- Transformers to be equipped with oil collecting sumps
- Fencing must allow the passage of terrestrial vertebrates and must not have sharp elements

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Cedillo solar PV plant

The Cedillo PV plant has a total capacity of 375 MWp (295 MWac grid feeding capacity). The power is evacuated via a 30 kV underground network to the Cedillo PV substation, located adjacent to the project site and shared with two nearby PV plants. From there an existing HV transmission line connects to the national grid. Cedillo PV substation and transmission line are part of an existing PV plant and not subject to the present EIA.

The PV plant is located at the territories of the municipalities Cedillo and Herrera de Alcántara in Cáceres province, in a triangle between the rivers Tagus in the north and Sever in the southwest, both within the distance of about 4-5 km. The landscape is a slightly undulating plateau with steeper slopes towards the rivers, dominated by a mixture of pastures, dry farmland with some areas of classified Habitats of Community Interest (6310 Dehesas with evergreen quercus, 6220* Pseudo-steppe with grasslands and 6420 Mediterranean tall humid grasslands (around temporary ponds)). The scheme occupies a total area of 484 ha, out of which 181 ha will be directly used for the construction of the project. The final site and the lay-out of the plant were determined upon comparison of different alternatives aiming at minimising the overall environmental impact.

The plant is entirely located within two overlapping Natura 2000 sites, SAC ES4320002 Cedillo y Río Tajo Internacional under the Habitats Directive and SPA ES0000368 Rio Tajo Internacional y Riberos under the Birds Directive, and in the proximity (ca. 5 km) of the SPA/SAC PTZPE0042 Tejo Internacional, Erges e Pônsul. An Appropriate Assessment[i] was conducted and the competent authority concluded that, the project is not expected to adversely affect the integrity of the Natura 2000 sites in view of their conservation objectives, as long as adequate measures to mitigate negative environmental impacts, are in place.

The installation will take place partly on protected habitats 6130 (Dehesas with oak trees), which is a key element of the SAC, however, (according to the EIA) these habitats are already in an unfavourable conservation status, with only low density of oaks and cork oaks, often in a bad condition. To restore or compensate for the loss of habitats, relevant measures need to be implemented. In line with the EIA, healthy oak trees shall not be felled for the construction.

The project site serves as feeding or hunting ground for protected bird species, nesting in the areas along the rivers with steep slopes and denser vegetation, including Iberian Imperial Eagle (Aquila Adalberti, vulnerable (VU) acc. IUCN[2] Red List), Egyptian Vulture (Neophron Percnopterus), endangered (EN) acc. IUCN), Royal Eagle (Aquila Chrysaetos) or Black Stork (Ciconia Nigra), both classified as least concern (LC) acc. IUCN. The PV plant is not expected to affect the breeding areas; however, the reduction of the feeding ground and the barrier effect may entail a negative impact that will be compensated by creation of suitable alternatives in the surrounding and a general improvement of the conditions for the affected species.

Vulnerable bat species according to IUCN (Mediterranean Horseshoe Bat (Rhinolophus Euryale), Mehely's Horseshoe Bat (Rhinolophus Mehelyi), Schreiber's Bent-winged Bat (Miniopterus Schreibersi)), would be expected in the area, but have not been identified during the relevant survey. The situation must be further monitored during implementation and operation of the project and, if necessary, adequate measures need to be agreed with the competent authority.

The (temporary) ponds and small steams constitute important habitats for amphibians (for example European Pond (Turtle (Emys orbicularis,) or Schreibers Green Lizard (Lacerta Schreiberi), both considered as near threatened (NT) acc. IUCN) and dragonflies (incl. Gomphus graslinii, near threatened acc. IUCN). To avoid negative impact, the construction must keep strict distances from such sensitive areas.

[2] International Union for Conservation of Nature

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The DIA (Declaración Impacto Ambiental), issued on September 9th, 2022, clearly specifies the conditions for implementation including a detailed program for restoration and improvement of habitats at the project site as well as in the closer surrounding, to be implemented and managed over the lifetime of the project, in close cooperation with the competent authority and in line with the latest Management Plan of the Natura 2000 network. In addition, it defines a detailed environmental monitoring program to be established and the respective reporting requirements.

Velilla solar PV plant

The Velilla PV plant has a total capacity of 350 MWp (275 MWac grid feeding capacity) and applies single axis tracker systems. The power is evacuated via a 30 kV underground network to the Velilla PV project substation, located at the project site. This project substation is further connected via a 400 kV overhead line of about 9.63 km to the (TSO owned) grid substation at Velilla del Río Carrión. The transmission line is shared with another PV plant, the shared part was investigated under a different EIA.

The PV plant is located within the territory of the municipality Villalba de Guardo, in Palencia Province and occupies a total fenced area of 606 ha. The transmission line crosses the territories of further municipalities (Mantinos, Guardo, Velilla del Rìo Carrión). The project area is flat and characterised by agricultural use with a few rows of hedges and some small areas of non-cultivated land, constituting naturalised habitats within the project boundary. Towards the west the site is limited by a forest area; towards east it approaches the shore areas of the river Carrión. The selection of the final site, the lay-out and routing of the power evacuation line is a result of comparison of different alternatives aiming at minimising the overall environmental impact and considering the concerns expressed during the public consultation process.

Parts of the investigated project area are classified as Habitat of Community Interest under the Habitats Directive (4020* Temperate Atlantic wet heath with Erica, 4030 European dry heath, 4090 Endemic oro-Mediterranean heaths with gorse or 9230 Galicio-Portuguese oak woods). They are explicitly excluded from the installation works of the PV modules; however, they might be affected by some sections of the transmission line. The project must avoid destroying protected plants; felling of Oak trees is prohibited.

According to the avifauna study, the project site hosts some nesting steppe birds (mainly Hen Harrier (Circus Cyaneous, least concern (LC) acc. IUCN) and serves as feeding and hunting ground for birds of prey and necrophages, including protected species such as Egyptian Vulture (Neophron Percnopterus, endangered acc. IUCN), Red Kite (Milvus Milvus, near threatened acc. IUCN) Common Buzzard (Buteo Buteo, least concern acc. IUCN) or Short-toed Snake Eagle (Circaetus Gallicus, LC acc, IUCN).

Along the transmission line also Royal Eagle (Aquila Chrysaetos) and Booted Eagle (Aquila Pennata) were observed (both LC acc. IUCN). Measures to avoid bird collision at the transmission line according to current regulations are foreseen. Compensation for the lost habitat is required and will be incorporated in the promoter's Environmental and Landscape Restoration Program to be agreed with the relevant authorities.

No significant impact is expected to the bat population, nevertheless, further bat monitoring will be carried out during the first years of operation. The site also hosts various types of reptiles including protected species, which will be mainly affected during the construction phase. Protective measures must be implemented during construction (for example related to traffic management or escape ramps in open trenches).

The closest Natura 2000 sites are SAC/SPA ES4140011 Fuentes Carrionas y Fuente Cobre-Montaña Palentina, located about 2 km from the PV plant and SAC ES4140077 Riberas del Río Carrión y affluentes and about 1 km from the transmission line. The SPA ES4130003 Picos

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de Europa en Castilla y León is located within a distance of 10 km. Given the distance and nature of the project, the competent authority concluded that the project is not likely to have an impact on these sites with regard to their conservation objectives.

The DIA (Declaración Impacto Ambiental), issued on December 20th,2022, specifies the required preventive, corrective and compensation measures including a detailed environmental monitoring program and the respective reporting obligation.

Ciudad Rodrigo solar PV plant

The Ciudad Rodrigo PV plant is entirely located at the territory of the municipality of Ciudad Rodrigo in Salamanca Province. It occupies a total area of 360 ha split into four separately fenced areas (northwest, northeast, central and south). Detailed site and final configuration were determined upon an assessment of alternatives and considering objections received during the public consultation phase. In addition, the conditions and restrictions defined in the DIA, issued on January 18th ,2023, required further modifications and resulted in a slight reduction of the initial scope of the project.

The scheme has a total installed capacity of 304 MWp (265 MWac grid feeding capacity). The power is evacuated via a 30 kV underground network to the project substation (30kV/400kV), located at the north-eastern project area and further connected to Ciudad Rodrigo grid substation (owned by the TSO) via an overhead transmission line of about 1.2 km. Project substation and transmission line are part of the project and included in the EIA process.

The landscape is a sedimentary basin of low and undulating plains, crossed by small streams. It is characterised by mainly agricultural use (dry farmland and pastures) with some spots of oakwood, natural herbaceous and small ponds. The project area itself is expected to include small areas with Habitats of Community Interest (mainly 6220* Pseudo-steppe with grasslands, 4090 Endemic oro-Mediterranean heaths with gorse and 5330 Thermo-Mediterranean and pre-desert scrub). A detailed pre-construction survey will identify all sensitive areas, to be excluded from the construction. Should this not be possible, further measures to restore or compensate will be agreed with the environmental authority.

The northern project areas are adjacent to the Natura 2000 Sites Campo de Argañán (SAC ES4150098 and SPA ES0000218), designated mainly for the protection and recovery of the Black Stork (Ciconia Nigra, LC acc. IUCN). A one-year on-site inventory has detected various protected species in the wider surrounding, including Red Kite (Milvus Milvus, NT acc. IUCN), Black Vulture (Aegypius Monachus, NT acc. IUCN) or Lesser Kestrel (Falco Naumanni, LC acc. IUCN). However, only one specimen of Black Stork was identified in the close surrounding of the project. No caves or shelters for bats were located at the project sites. In the areas around the ponds, amphibians and reptiles, including European Pond Turtle (Emys Orbicularis, NT acc. IUCN) were found. An Appropriate Assessment was conducted, considering the detailed studies carried out int the course of the EIA. The relevant authority does not expect a significant negative impact on the integrity of the Natura 2000 sites in view of their conservation objectives.

The project entails a temporary negative impact due to nuisance and displacements during the construction works, that need to be mitigated by the application of environmental best practice, respecting distances and avoiding reproductive periods for the start of construction. During the operation phase, the loss of feeding ground is expected to be the main negative impact that must be compensated. The transmission line does not cross any classified habitat or protected area; however, it must be designed and equipped to avoid bird collision.

The landscape impact study revealed that part of the PV plant is visible from the historic complex in the old town of Ciudad Rodrigo, classified as cultural heritage. To mitigate the negative visual impact, a shield of suitable native flora will be planted along the project fence.

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Further archaeological and cultural heritage sites have been identified during the EIS. The DIA clearly defines the distances from such sites, that the project must respect.

Peñaflor solar PV plant

The Peñaflor PV plant is entirely located at the territory of Alfajarín municipality, about 8 km east of the town centre, in Zaragoza province. It occupies an area of 215 ha, located within the perimeter of the existing Campoliva II wind farm. Based on the analyses of different alternatives, this location is considered to have the lowest environmental impact. The final layout is taking into account the concerns expressed in the course of the public consultation process and specified in the environmental impact statement (DIA), issued on January 2nd, 2023.

The scheme has a total capacity of 136.5 MWp (113 MWac grid feeding capacity). The power is evacuated via a 30 kV underground network to the Alfajarín substation, which is shared with other PV plants and located adjacent to the project site. This substation is then connected via a 400 kV overhead transmission line of about 9 km to the Peñaflor grid substation, owned by the TSO. The Alfajarín substation as well as the transmission line belong to another project and are not part of the present EIA.

The landscape is a mixture of flat, dry alluvial land with rainfed farmland (winter cereals, almond trees) and dispersed non-cultivated hills with remaining natural vegetation of scrubs (for example Retama or Kermes Oak) and herbaceous. Only small patches within the project area are classified as Habitat of Community Interest under the Habitats Directive (1520* Iberian gypsum steppes, 1430 Halo-nitrophilous scrubs and 92D0 Southern riparian galleries and thickets) and are explicitly excluded from the construction works. The hills shall not be levelized for the installation of the modules.

The site is within a regional priority area for protection of steppe bird species, (such as Lesser Kestrel (Falco Naumanni, LC acc. IUCN), Great Bustard, (Otis Tarda, VU acc. IUCN), Black-bellied Sandgrouse (Pterocles orientalis, EN acc. IUCN) and Pin-tailed Sandgrouse (Pterocles alchata, LC acc. IUCN). It is located at about 2 to 5 km from the nearest Natura 2000 sites (SPA ES0000180 Estepas de Monegrillo y Pina, SPA ES0000295, Sierra de Alcubierre, Saso de Osera, SAC ES2430083, Montes de Alfajarín-Saso de Osera, SAC ES2410076, Sierras de Alcubierre y Sigena), hosting a number of protected steppe birds. However, the bird and bat survey did not identify one of key species directly at the project site,but reports important nesting areas in the proximity. It is expected that these birds are already avoiding the project site due to presence of the wind turbines.

Considering the cumulative effects arising from various planned PV plants and the existing wind farms, the environmental authorities require a particular program to restore habitats for steppe birds in the surroundings of the project area, but not directly at the wind farm site. The selection of the area and the detailed program including monitoring and must be agreed with the relevant authority. The Appropriate Assessment was concluded that, with these measures in place, the project is not expected to have significant negative impact on the integrity of the nearby Natura 2000 sites in view of their conservation objectives.

Iglesias wind farm

The Iglesias wind farm is located at the territory of Iglesias municipality; the associated transmission line extends over the municipalities of Iglesias, Hontanas, Tamarón, Los Balbases, Estépar, Rabé de las Calzadas, Tardajos, San Mamés de Burgos and Villalbilla de Burgos in the Province of Burgos.

The Wind Farm consists of 10 wind turbines with a rated power output of 6.4 MW each (170 m rotor diameter at 135 m hub height). The turbines connect via 30 kV underground cables to the

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project internal 30kV/220kV substation, which is then connected via a 20 km overhead transmission line and 460 m underground cable to the existing grid substation Villalbilla. The project substation and the power transmission line are part of the project. Further wind farms are located and/or planned within a distance of 10 km of the project site; cumulative effects have been considered in the EIA. The final site and layout of the wind farm as well as the detailed routing of the transmission line has been determined upon an analysis of different alternatives with regard to their environmental impacts.

The landscape is mainly open and slightly undulating with some valleys along the small tributaries of the Arlanzón river. The land is predominantly used for agricultural purpose with spots of natural areas along the creeks, as well as dispersed deciduous woods. The wind turbines will be located at an elevated table mainly on dry farmland; the transmission line and access roads, however, will also cross some areas with natural vegetation or forests, classified as Habitat of Community Interest.

The EIA includes an avifauna and bat study, based on desk studies and on detailed on-site inventories over one year. The study has identified various sensitive species having a high risk of collision with the wind turbines and/or the transmission line, such as Black Vulture (Aegyptius Monachus, NT acc. IUCN), Red Kite (Milvus Milvus, NT acc. IUCN), Iberian Imperial Eagle (Aquila Adalberti, VU acc. IUCN), Montagu's Harrier (Circus Pygargus, LC acc. IUCN), Common Buzzard (*Buteo Buteo, LC, acc. IUCN*) or, Eurasian Griffon Vulture (Gyps Fulvus, LC acc. IUCN). Different bat species (i.e Common Pipistrelle, LC acc. IUCN) were observed in the study area, but not at the more exposed area of the wind turbines, so that the collision risk is considered lower for the turbines but high for some sections of the transmission line. The overhead line for the transmission has been accepted only under the condition that the line is shared with nearby projects (planned to connect to the same grid substation) to limit the cumulative impact. Otherwise, the transmission line needs to be buried.

To reduce the risk of collision of birds with turbines, the DIA, issued in December 2022, requires eliminating six of the initially planned 16 turbines and specifies a number of conditions and preventive measures including an automated bird detection system at each turbine and the need to stop the turbines during the most likely periods for bat movements (July till October, around and after sunset and at favourable weather conditions). The transmission line must be equipped with bird-safer beacons and luminescent signals; the conductors shall be installed at equal hight, avoiding several levels of potential collision. Regular monitoring during construction and operation shall take place in close coordination with the authorities. In case of observed collision of species classified as vulnerable or in danger of extinction or unexpected high rate of collision of less threatened species, mitigation measures should be gradually extended, following a predefined protocol.

A further impact of the wind farm, in particular in combination with other planned and existing projects, is the loss, fragmentation and deterioration of habitat and the barrier effect that could lead to displacements and changes in behavioural patterns. A pre-construction survey will identify all sensitive areas to be excluded from the construction. If this is not possible, the promoter must inform the environmental authority and agree on establishing further measures to restore or compensate for the loss of habitat through creation of new habitats and improvement of conditions in nearby areas. The construction schedule has to respect the breeding period and needs to be agreed with the authority as well.

The wind turbines are not located inside a Natura 2000 site; only, the transmission line crosses the SAC ES4120072 Riberas de Rio Arlanzón y Afluentes (consisting of small stripes along the riverbeds), with the classified Habitats of Community Interest 92A0* (Riparian forests of the Mediterranean with willows and poplar) and 3260 (Watercourses of plain to montane levels, with submerged or floating vegetation). An Appropriate Assessment was conducted, concluding that that the project is not expected to adversely affect the integrity of the Natura 2000 site as long as mitigation measures are in place. (The towers need to be outside the SAC and high enough to avoid damage to the vegetation by the line.)

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Noise levels, resulting from the operation of the turbines were calculated, demonstrating that the limits as per national law for the closest residential building will be respected. During construction, a temporary increase of noise is expected, and a noise monitoring plan will be implemented.

EIB Carbon Footprint Exercise

The direct CO_2 equivalent emissions of this investment programme are negligible.

In accordance with the Bank's current Carbon Footprint methodology, it is calculated that based on the avoidance of electricity generation of existing and new power plants in Spain (combined margin for intermittent generation) the total relative effect of the project is a net reduction in CO2 equivalent emissions by roughly 690 ktCO2eq/yr.

For the annual accounting purposes of the EIB Carbon Footprint, the programme 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

As assessed under the framework loan (FL) 2022-0085 IBERDROLA GREEN ENERGY FRAMEWORK LOAN II, the counterparty is not involved in incompatible activities, and it meets the requirements of the EIB PATH framework with its existing alignment plan.

Social Assessment

The promoter is engaging with the landowners in order to secure voluntary agreements for the lands required by all project infrastructures, either in the form of leases with annual payments or of surface rights or rights of way with single payments. If voluntary agreements cannot be reached (which is sometimes the case for small portions of the transmission line), the promoter intends to require expropriation, in line with Spanish legislation. In Spain, all projects required for the implementation of the different activities within the electricity sector, including generation, promoted by public or private companies, are considered public utility, and are subject to urgent forced expropriation to be carried out by the authority in the interest of the promoters.

To date no expropriation is foreseen for any of the projects, although the promoter has requested the DUP (Declaración de Utilidad Pública) for Cedillo. Velilla project is entirely located in public land plots (Montes de Utilidad Pública) as well as a substantial portion of the transmission line. For the Cedillo project, the promoter has secured 100% of the land by means of bilateral agreements. Similarly, Ciudad Rodrigo Project has secured 100% of the land plots of the solar PV plant and the transmission line is mostly secured. Iglesias wind farm has secured 100% of the land plots of plant and 75% of the transmission line.

Recent reports are pointing out the possibility of use of forced labour in the supply chain of PV modules. The promoter has performed a supply chain mapping exercise with its suppliers, concluding that there is no evidence that the factories involved in this project are using forced labour. The promoter is committed to continue its engagement with the PV module manufacturers and their sub-suppliers and review their practices to avoid the use of forced labour in the supply chain.

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The project will have to comply with the EIB E&S standards, which foresees a zero tolerance of forced labour and require promoters to make reasonable efforts to assess if there are labour risks associated with the primary suppliers of goods and materials essential to core functions of the project.

Public Consultation and Stakeholder Engagement

For all projects, public consultations were carried out as part of the EIA process as required by EU, national and regional legislation. Lists of consulted stakeholders are attached to the DIAs, including concerned local and regional authorities (concerning environment, forest, agriculture, hydrographic, spatial planning or tourism) relevant NGOs and the public. Comments and objections have been considered in the DIA.

Other Environmental and Social Aspects

The Promoter is known to the Bank from previous operations and has sufficient E&S capacity to implement the project. The promoter has a solid organisational structure and has certified its management systems (ISO 14001).

Conclusions and Recommendations

The individual projects are expected to entail negative environmental impacts, which need to be mitigated or compensated by adequate measures.

The promoter undertakes to:

- Confirm at project completion that all required mitigation, correction and compensation measures, including related monitoring program, were effectively put in place during construction and operation for all projects
- 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 will be delivered to and reviewed by the EIB prior to allocation of any funds to the respective programme scheme.

Under these conditions the operation is acceptable for EIB's financing in E&S terms.

[i] Appropriate Assessment in accordance with the EU Directives 92/43/EC (Habitat Directive and 2009/147/EC (Bird Directive)