



Luxembourg, MC decision 16/04/2024

Environmental and Social Data Sheet

Overview

Project Name:	BPCE ACTION POUR LE CLIMAT IV
Project Number:	2023-0461
Country:	France
Project Description:	The project consists of an intermediated lending facility in support of small to mid-sized renewable energy projects in France (onshore wind, photovoltaic, biomass and biogas).
EIA required:	Some of the projects might require an EIA
Project included in Carbon Footprint Exercise ¹ :	No

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

Environmental and Social Assessment

Environmental Assessment

The operation concerns a framework loan with Banque Populaire Caisse d'Épargne (BPCE) to finance small and medium scale renewable energy projects (primarily solar PV and onshore wind, and biomass and biogas projects) in France.

The operation will contribute to EU energy objectives by supporting investments in new renewable energy generation capacity and energy efficiency. The investments will generate environmental benefits in terms of reduction of air pollutants and GHG emissions, ultimately helping to mitigate climate change.

The Financial Intermediary (FI) is known to the EIB through three previous operations of similar characteristics and is familiar with the Bank's Environmental and Social requirements.

The FI will be contractually obliged to ensure that all investments comply with the relevant EU Environmental Directives (e.g. EIA Directive 2014/52/EU amending Directive 2011/92/EU, Habitats Directive 92/43/EEC and Birds Directive 2009/147/EC amending Directive 79/409/EEC) and the EIB's Environmental and Social Standards (where applicable).

Due to their technical characteristics, most of the investments are expected to fall under Annex II of Directive 2014/52/EU amending Environmental Impact Assessment (EIA) Directive 2011/92/EU, leaving it to the national competent authority to determine according to Annex III of the said Directive whether an EIA is required. Most of the individual schemes to be financed are likely to have limited negative environmental impacts which are expected to be mitigated appropriately. For projects that require an EIA, the Bank will require the FI to store and keep updated any documents that may be relevant for the project (including EIA screening decisions, environmental studies, environmental monitoring reports or equivalent documents) supporting the compliance with the EIA Directive and national environmental regulations. The Financial Intermediary shall upon request promptly deliver such documents to the Bank.

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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Should any scheme have a potentially significant negative impact on an area forming part of the EU Natura 2000 network (falling under Habitats Directive 92/43/EEC or Birds Directive 2009/147/EC), the FI will be required to verify that none of the schemes has a significant adverse impact on any of these sites of nature conservation importance. Written confirmation from the competent nature conservation authority, or an equivalent confirmation satisfactory to the Bank that the mentioned scheme does not have a significant negative impact on any site of nature conservation importance should be presented, as a condition of disbursement. Schemes with significant negative impacts on areas with high biodiversity value, nature conservation areas, including bird migration routes, shall not be eligible.

In the case of biofuels, bioliquids and biomass fuels used for the FI's operations, these are required to be sustainably produced and comply with the EU sustainability criteria of the revised Directive (EU) 2018/2001 and EU Taxonomy Delegated Act.

The FI shall be required to retain appropriate records evidencing that the schemes are in line with the relevant Bank's environmental and social standards and EU legislation. Such documents shall be provided to the Bank upon request.

EIB Paris Alignment for Counterparties (PATH) Framework

BPCE is in scope of the PATH procedure for financial intermediaries. It already publishes dedicated reporting in line with TCFD recommendations (the 2022 report is available in the following [link](#)), and has completed the relevant questionnaire. It is hence considered to meet the PATH requirements. No additional contractual undertakings or advisory services will be required. Furthermore, BPCE supports the targets of the Paris Agreement and is committed to achieving net-zero carbon emission by 2050.

Under these conditions, the operation is acceptable in E&S terms.

Social Assessment, where applicable

All projects need to comply with the Bank's requirements, including applicable provisions of the relevant labour standard of the Bank. The FI will be required to undertake reasonable efforts to mitigate risks of forced labour in the supply chain. This will include, on a best effort basis, enhanced due diligence also guided by the FI's human rights policy, and ensuring that appropriate contractual provisions are cascaded to contractors/suppliers of the projects.

Public Consultation and Stakeholder Engagement

As required by EU Member States' laws and regulations, the FI shall ensure that a consultation process with relevant stakeholders takes place and that an appropriate grievance mechanism is in place, including the development of a communication mechanism with external stakeholders as part of the Grievance Redress Mechanism for the underlying investments.

Other Environmental and Social Aspects

The FI has significant experience in financing renewable energy installations in France and other Member States, especially in the onshore wind and solar PV sectors, and is deemed to have adequate capacity to ensure compliance with the Bank's environmental and social requirements.

The FI applies a comprehensive ESG policy, including reporting and monitoring, following the Equator Principles and making annual reporting on sustainable activities available to the public.



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The FI has policies and procedures in place to assess environmental and social (E&S) risks in the operations it finances, and has a dedicated team to assess and monitor E&S matters.

Conclusions and Recommendations

The Bank has reviewed the E&S risks associated with the operation as well as the E&S capacity of the FI. It is considered that the environmental procedures carried out for individual schemes, verified by the FI, will appropriately address environmental issues and ensure that the schemes to be part-financed under this framework loan meet the Bank's requirements.

The operation is considered acceptable for Bank financing from an E&S perspective, with the following E&S disbursement conditions and undertakings included in the finance contract:

- For the projects eligible for EIB financing the FI shall require that they be implemented in line with the applicable national and EU legislation.
- If a scheme falls under Annex I or Annex II of the EIA Directive, the FI shall ensure that the project's promoters comply with the provisions of the EIA Directive as transposed into national law. When relevant, the FI shall deliver to the Bank the EIA report and other relevant environmental documents.
- Projects located inside Natura 2000 sites and projects with significant negative impacts on areas with high biodiversity value shall not be eligible.
- The FI will ensure that the projects do not imply any reduction / obstacle to food production on the agricultural land concerned.
- The FI will ensure that the project promoter will implement best available techniques to prevent methane leakage from biomethane production units.
- The FI will be required to undertake, on a reasonable effort basis, enhanced due diligence (supply chain mapping of the PV module manufacturers reaching the level of silicon/polysilicon suppliers and/or declarations by the PV module manufacturers concerning the origin of the components used in the PV modules, per project) also guided by the FI's human rights commitment, and ensuring that appropriate contractual provisions are cascaded to contractors/suppliers of the projects.