



## Environmental and Social Data Sheet

### Overview

Project Name:	Atlas Iberia RE Green Loan – Manztierra
Project Number:	2020-0839
Country:	Spain
Project Description:	Project Manztierra, a solar PV plant part of the financing of a portfolio of greenfield onshore wind and solar PV projects in Spain and Portugal

EIA required: yes (simplified)

Invest EU sustainability proofing required yes

Project included in Carbon Footprint Exercise: yes

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

### Environmental and Social Assessment

The Manztierra 1 Project consists of the construction and operation of a solar photovoltaic (PV) plant with a total capacity of 40.5 MWp located near the town of Manzanares, province of Ciudad Real, region of Castilla-La Mancha. The project scope includes the associated infrastructure for the grid interconnection.

The Project’s point of interconnection to the grid is the Manzanares 400 kW substation owned by Red Eléctrica de España (REE), with a grid limitation of 30 MWac.

The interconnection is composed of the following:

- 30 kV underground line from the Project area to the SE Rotonda 132/30 kV substation, located approx. 700m north of the site;
- 4 km of 132 kV overhead line to the SE 2 Manzanares substation. The 132 kV line is shared between the Project and a nearby PV plant;
- SE 2 Manzanares substation (400/132/30 kV) and approx. 200m of 400 kV overhead line shared among 10 projects, to the 400 kV Manzanares substation owned by the grid operator REE.

### Environmental Assessment

Since the installed capacity of the Project is below 50 MW, it is subject to the regional environmental procedure. According to Spanish law ‘Ley 4/2007 Evaluación Ambiental de Castilla-La Mancha’, the Project is subject to a simplified environmental assessment procedure, meaning that no screening decision by the Competent Authority in line with Directive 2014/52/EU amending the EIA Directive 2011/92/EU is required.

An Environmental Impact Study (EIS) was carried out in 2020/2021 covering PV plant and interconnection infrastructure. The Project then obtained the environmental



decision/permit (Declaración de Impacto Ambiental - DIA) on 16<sup>th</sup> December 2021, for the PV plant and its power evacuation infrastructure.

The general quality of the EIS report in terms of the impact assessment methodology, desk studies and field work conducted is considered acceptable. The EIS also includes a cumulative impact assessment considering neighbouring infrastructure, including other solar PV plants and transmission lines.

The EIS concludes that the impact of the project is acceptable during both construction and operational phases, provided that the preventive and corrective measures defined are implemented.

The project is found not to have any significant impact on avifauna, flora and landscape, and also on soil, air quality, and the local population. The Project (including interconnection infrastructure) is not located within any protected area such as Natura 2000, and is not within an area of influence of any protected area. The closest protected area is the *Microrreserva Albardinales de Membrilla-La Solana*, located 6.8 km to the south of the Project.

Mitigation measures defined in the EIS were further complemented by conditions of the environmental permit and can be summarised as follows:

- During construction, the project must adhere to extensive environmental and ecological preservation measures, including the protection of natural vegetation and habitats crucial for threatened bird species, and the creation of ecological corridors to reduce habitat fragmentation. Efforts to minimize environmental impact involve controlled excavations, dust, noise, and light pollution management, and strict waste and water resource handling protocols. Additional provisions include the installation of safety and surveillance systems, use of bird-friendly infrastructure on overhead lines, and the maintenance of nearby public paths and archaeological sites throughout the project's development and operation.
- During operation, the project requires ongoing monitoring for at least five years post-commissioning, focusing on avifauna and vegetation management. Maintenance of bird habitats and pollution control measures, including rainwater treatment and light pollution reduction, are mandated. Waste must be managed per Spanish legal requirements.

The EIS report and environmental permit cover the entire lifecycle of the Project, including the decommissioning phase, with the aim to reinstate the Project area to its original state. All remaining materials, waste, or excess soil shall be managed by an authorized waste manager appropriate for the nature of each type of waste. Restoration shall include the attempt to maintain the terrain's original topography. The soil extracted during the construction phase will be stored for later use during restoration of degraded areas. The decommissioning shall not affect the implemented vegetation screen and the planting, nor other complementary measures for birdlife habitat improvement. Disposal of all waste generated during the project life, including the decommission phase, shall be subject to the relevant Spanish legislation.

## **EIB Carbon Footprint Exercise**



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 Spain (combined margin for intermittent generation), the total relative effect of the project is a net reduction in CO<sub>2</sub> equivalent emissions by ca. 24.1 kt CO<sub>2</sub>-eq/yr.

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

### **Climate Assessment**

The Project substantially contributes to the climate change mitigation objective. 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. Residual risks from physical climate hazards are deemed low.

### **Social Assessment, where applicable**

The vast majority of the land required for the Project was either leased or purchased by the promoter. The promoter also applied for the public utility declaration ("DUP / Declaración de Utilidad Pública") which is required for starting any expropriation procedure. This declaration was issued on 15/02/2023.

In Spain, all projects considered of public utility, can be subject to expropriation, to be carried out by the relevant authorities in the interest of the promoter.

### **Public Consultation and Stakeholder Engagement**

A 30-day public consultation process was carried out as part of the regional environmental procedure ('Ley 4/2007 Evaluación Ambiental de Castilla-La Mancha'). No further stakeholders engagement activities were undertaken.

### **Other Environmental and Social Aspects**

Recent reports are pointing out the possibility of use of forced labour in the supply chain of solar PV panels. The promoter has robust human and labour rights policies in place, rejecting the use of any form of forced or compulsory labour. Such policies also put the same obligations on suppliers and sub-suppliers.

An enhanced forced labour due diligence was carried out by the promoter on the modules' supply chain up until polysilicon level, confirming that none of the components and sub-components are manufactured in a high forced labour risk area.

The project shall also comply with the EIB Environmental and Social Standards, which foresee a zero tolerance for the use of forced labour.

## **Conclusions and Recommendations**

The Project has obtained the required environmental and construction permits for the solar PV plant and its power evacuation infrastructure. The related Environmental Impact Study was carried out.

The Project is expected to have limited social and environmental impact, provided that all mitigation measures, as included in the EIS and environmental permit, are implemented.

