Luxembourg, 16.12.2020

Public

Environmental and Social Data Sheet

Overview

Project Name:	*FRENCH OFFSHORE ROUND 1 - COURSEULLES-SUR-MER*
Project Number:	*2016-0002*
Country:	*France*
Project Description:	Design, build, maintain and operate a 450 MW offshore windfarm 10 km off the French coast.

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 comprises the design, construction, operation and maintenance of an offshore wind farm located 10 km off Courseulles-sur-Mer in the French region of Normandy.

By virtue of its technical characteristics, the project would fall under Annex II of Directive 2014/52/EU amending the EIA Directive 2011/92/EU. Under French law, an Environmental Impact Assessment (EIA) including public consultation is mandatory and was duly conducted in 2014 for the wind farm including its grid connection facilities and maintenance base. The grid connection facilities consist of a double-circuit 225 kV cable of ca. 39 km in length – 15 km underwater and 24 km underground – as well as the related offshore transforming substation and extension of an existing onshore substation.

The EIA report evaluated potential impacts of the project on air and water quality, climate, soil, noise (underwater and over water), safety, benthos and fish, sea mammals, avifauna, electromagnetic fields, socio-economic impacts, visual disturbance, cultural heritage and monitoring.

The EIA report identifies several potential negative environmental impacts for which they propose mitigating measures. The EIA report was reviewed by the competent authorities, on the basis of which they considered that if the mitigating measures are put in place the project will not have significant environmental or social impacts. The main project impacts, together with the proposed mitigating measures, are listed below:

[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 CO_2-e/year absolute (gross) or 20,000 tonnes CO_2-e/year relative (net) – both increases and savings.

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1. Increased underwater noise may represent a risk particularly for sea-mammals present at or near the wind farm site, for example marine porpoises, dolphins, seals and pilot whales. As a mitigation measure, the promoter will use acoustic deterrent devices and noise ramp-up procedures ("soft-start / ramp-up") during piling. In addition, the promoter will monitor the effectiveness of this measure during piling using buoys fitted with hydrophones deployed around the monopiles, and during construction and early operation using autonomous detectors or wide-band tethered hydrophones.
2. The project may affect fishing resources through noise impacts to larvae of fish and scallops present at the project site, as well as through loss of habitat and direct impact (crushing) of low-mobility benthic species. As a mitigation measure, the promoter has reduced by 35% (from 77 to 50 km^2) the surface where wind turbines will be installed, avoiding the north-western tip of the project site, where the most abundant fishing resources are located.
3. The project impacts on avifauna include the loss of habitat (feeding, resting) to the project site during construction and operation, mainly for loons (black-throated, red-throated, common), northern gannet, great skua, etc. In addition, photo-attraction and barrier effects could lead to exhaustion, disorientation or collision with wind turbine blades during operation, in particular for nocturnal migratory species such as the Manx and Balearic shearwater, European and Leach's storm petrel. The mitigation measure indicated above (reduction of project area) would reduce loss of habitat impacts, as it reduces the impacts on the main prey of birds. The measure would also reduce barrier effects – measured as the length where wind turbines are installed perpendicular to bird migratory routes – by 36% (from 12.5 to 8 km).
4. The project impacts to chiropters (bats) mainly relate to photo-attraction that could lead to exhaustion, disorientation or barotrauma. Photo-attraction can be direct for certain bat species such as the common or lesser noctules or Nathusius's pipistrelle, whereas in other cases it could be indirect due to insects being attracted to light. As a mitigation measure, the promoter will reduce site lighting at night to a strict minimum, and will use directional beams to reduce light pollution.
5. The grid connection facilities will have their main negative impacts during construction of the underground segment and expansion of the onshore substation. Even though the chosen routing follows existing infrastructures to the extent possible, its main environmental impacts relate to potential nuisance to chiropters, avifauna, amphibians and reptiles, in particular bats such as the Western barbastrelle,[2] bird species such as the hen harrier or the meadow pipit[3] (destruction of nests, eggs, individuals), the smooth newt[4] or the parsley frog[5] (habitat destruction, destruction of individuals). As a mitigation measure, the grid connection will be built only during daytime to minimise nuisance to avifauna and bats, using methods that avoid destroying trees and hedges – typical nesting habitats – along most of the routing. An ecologist will verify certain sections of the routing, which have been identified as potential hen harrier nesting sites, prior to start of works in those sections. In addition, the routing will follow agricultural terrains in proximity to the onshore substation, avoiding habitats favourable to the parsley frog. Finally, the grid connection construction activities will affect the beach of Bernières-sur-Mer, hence construction works during peak summer season (May to mid-July) will be avoided as far as possible.

For both the wind farm and the grid connection facilities, and in compliance with the relevant articles in the Habitats Directive, the project's EIA report comprises an Appropriate Assessment (AA) of the impacts on Natura 2000 sites (including marine protected areas) in the light of their respective conservation objectives. It also includes proposed measures in order to mitigate these

[2] Near threatened.
[3] Idem.
[4] Near threatened in France.
[5] Vulnerable in the region (Basse-Normandie).

impacts. The corresponding AA studies have been reviewed by the relevant Competent Authorities, which concluded that the project would not have significant effects in regards to the integrity of these sites, if the proposed mitigating measures are duly put in place.

The wind farm AA study took a tiered approach, performing first a broader assessment on the expected impacts on the habitats and species relevant to all relevant Natura 2000 sites listed in the table below. It concluded that the sites where impacts were likely were those closest to the wind farm and the interconnection facilities, i.e. the eight sites within the Seine bay (in italic, in the table below). Thereafter, the AAs performed a detailed assessment of the potential impacts on the habitats and species of the selected sites, in particular in regards to avifauna and marine mammals in the case of the wind farm, and in regards to marine and terrestrial fauna and flora, including protected habitats, marine mammals, fish, birds and bats.

The grid connection AA study performs a separate analysis of seven Natura 2000 sites (listed in the table below), six of which were already identified in the wind farm AA. This analysis follows the same tiered approach: first, a preliminary analysis of impacts on all listed sites, to assess whether the likelihood of the project having significant impacts on said sites warrants a detailed analysis. The preliminary analysis phase showed that the project is unlikely to have a significant impact on any of the neighbouring Natura 2000 sites.

The table below lists the Natura 2000 sites located within 50 km of at least one of the two project components. The closest Natura 2000 sites are all located in the vicinity of the grid connection: SCI[6]/SAC[7] "Anciennes carrières de la Vallée de la Mue" (2 km), "Marais arrière littoraux du Bessin" and SPA[8] "Estuaire de l'Orne", (both c. 3 km). The Natura 2000 site closest to the wind farm is SCI/SAC "Baie de Seine orientale", at c. 5 km distance.

Site type	Site Code	Site name	Project component	Distance (km)
SCI/SAC	FR2502004	Anciennes carrières de la Vallée de la Mue	Grid connection	1.9
SCI/SAC	*FR2502021*	*Baie de Seine orientale*	Wind farm	5.5
			Grid connection	6.2
SCI/SAC	*FR2500090*	*Marais arrière littoraux du Bessin*	Wind farm	10.1
			Grid connection	2.6
SPA	FR2510059	Estuaire de l'Orne	Wind farm	17.7
			Grid connection	2.8
SPA	FR2512001	Littoral Augeron	Wind farm	14.7
			Grid connection	14.4
SCI/SAC	*FR2502020*	*Baie de Seine occidentale*	Wind farm	21.2
SPA	*FR2510047*			
SPA	FR2510099	Falaise du Bessin Occidental	Wind farm	23.9
SCI/SAC	*FR2500088*	*Marais du Cotentin et du Bessin ; Baie des Veys*	Wind farm	34.2
SCI/SAC	*FR2300121*	*Estuaire de la Seine*	Wind farm	34.6
			Grid connection	36.9

[6] Sites of Community Importance
[7] Special Areas of Conservation
[8] Special Protection Areas

SPA	FR2310044	Estuaire et marais de la Basse Seine	Wind farm	34.9
			Grid connection	36.9
SPA	FR2510046	Basses vallées du Cotentin et Baie des Veys	Wind farm	36.9
SCI/SAC	*FR2300139*	*Littoral Cauchois*	Wind farm	37.8
SCI/SAC	*FR2500085*	*Récifs et marais arrière littoraux du Cap Lévi à la Pointe de Saire*	Wind farm	42.8
SCI/SAC	*FR2500086*	*Tatihou - Saint Vaast-la-Hougue*	Wind farm	46

Table 1: List of Natura 2000 sites analysed in the AAs

EIB Carbon Footprint Exercise

The project will not generate absolute CO_2 emissions. 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 France (combined margin for intermittent generation), the total relative effect of the project is a net annual reduction in CO_2 equivalent emissions by 186 kt CO_2-e per annum.

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.

Public Consultation and Stakeholder Engagement

The project has followed extensive public consultations with local populations and the relevant authorities, in line with the requirements of national law. These consultations were undertaken in three broad phases: (1) voluntary informal consultation during project development; (2) public debate and (3) formal public consultation – the last two as required by the tender documents and by the national environmental law. The duration of the formal public consultation is determined by the competent authority, and cannot by law be shorter than 30 days, or longer than two months.

The voluntary informal consultation process began in January 2007, and its goal was to ensure adequate stakeholder engagement. This process also included two information meetings in May 2015, where between 70 to 80 people attended. The National Commission for Public Debate (Commission Nationale du Débat Public, CNDP) organised the public debate from March to July 2013, set up a dedicated website, and issued its conclusions in September 2013. During the debate, the CNDP noted that the promoter needed to perform additional studies, in particular in regards to avifauna and the visual impact of the wind farm. Around 2000 people attended the debate, and more than 21 000 visited the website. Finally, the project underwent a formal public consultation process between 10 August and 28 October 2015. The competent authority issued the environmental permit in April 2016.

Other Environmental and Social Aspects

The legality of the project's concession agreement and the award and operating licence have been challenged in court by local associations. The arguments put forward in all these challenges are wide-ranging and very similar for all of them. They pertain to the form of the permitting process (e.g. the length of the public consultation) and to its content (e.g. the ESIA not taking into account in sufficient detail risks such as one or several wind turbines collapsing). All the challenges have been rejected in the relevant courts, including the French highest administrative jurisdiction (Conseil d'Etat).

As part of the permitting process, the promoter will perform a thorough and overarching monitoring programme to assess the actual impact of the project on the environment. This monitoring programme will cover impacts on seawater quality, benthic species, fish stocks, marine mammals, avifauna, etc. during the periods relevant to each impact.

The promoter has a sound environmental management capability, a good understanding of regulatory and environmental monitoring requirements, as well as adequate knowledge of the mitigating measures to be performed during construction, notably in light of the detailed studies undertaken on the subject. In view of this, the promoter's environmental capacity is considered adequate.

Conclusions and Recommendations

The project's EIA and AA concluded that with adequate precautionary measures, the impacts on fauna and flora, including on local and migrating birds, marine mammals, benthos and invertebrates, were considered to be non-significant.

The Bank will require the promoter to submit electronic copies of summary reports submitted to the competent authorities, concerning any environmental monitoring that is undertaken during the construction and operation phases.

On this basis, the overall environmental impact of the project is considered to be acceptable to the Bank.