

Luxembourg, 14 December 2022

Public

Environmental and Social Data Sheet¹

Overview			
Project Name:	HE DREIHT OFFSH	IORE WIND	
Project Number:	2022-0473		
Country:	GERMANY		
Project Description:	The project concerns a large–scale, fixed-bottom offshore wind farm with a total nominal capacity of 960 MW, comprising 64 wind turbines of 15 MW unit capacity, monopile foundations and inter-array cabling.		
EIA required:		yes	
Invest EU sustainability proofing required		yes	
Project included in Carbon Footprint Exercise ² :		yes	

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

Environmental and Social Assessment

Environmental Assessment

The offshore wind farm He Dreiht will be located in an area of 62.5 km² sea area, 90 km northwest of Borkum and about 110 km west of the island of Helgoland with \sim 38-41m water depth. It will employ 64 wind turbines of 15 MW unit size, each with hub height of 140 m above sea level and rotor diameters of 236 m.

Wind farms and their grid infrastructure fall under Annex II of Directive 2014/52/EU amending the EIA Directive 2011/92/EU. Under German law (German Federal Emission Control Act), wind farms comprising 20 or more wind turbines are screened in for an EIA. Consequently, the Project had to undergo a full EIA process.

The promoter has presented an EIA report for the wind farm to the competent Authority (BSH - The Federal Maritime and Hydrographic Agency) in February 2022 that underwent public consultation from March to June 2022, with no substantial issues raised. The final BSH permit is pending.

¹ The information contained in the document reflects the requirement related to the environmental, social and climate information to be provided to Investment Committee as required by the Invest EU Regulation and it represents the equivalent of the information required in the template of the InvestEU sustainability proofing summary

² 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 EIA report assesses potential impacts of the project on biotopes, macro zoo-benthos, fish, sea birds and migratory birds, marine mammals etc. and proposes adequate mitigation measures. The documentation also includes an appropriate assessment of the project's impact on Natura 2000 sites and cumulated impacts with existing and planned neighbouring wind farms are considered. The promoter confirms that the EIA report is in accordance to the applicable standards defined by BSH.

The EIA report concludes that the project does not have any significant environmental impacts post mitigation and that the integrity of Natura 2000 sites is not significantly impacted by the project either. During construction, the most relevant environmental impacts are expected to originate from modifications of the sea bed structure and from construction noise. During operation, most relevant environmental impacts are expected to relate to birds, and the loon ("Seetaucher") in particular. The project's permanent visual impact is considered to be non-significant because of the project's distance of at least 90 km to the closest island and because of the already existing offshore wind farms in its direct neighbourhood.

Key mitigation and monitoring measures as included in the EIA report comprise, amongst others: adapted wind farm layout to avoid additional habitat loss for the loon ("Seetaucher"); low-noise foundation installation method (vibration process); extensive noise measurements in the course of the constructions phase to ensure the protection of porpoises; extensive environmental investigation years before, during and 3 to 5 years after construction in order to protect the features of conservation interest, i.e. benthos, fish, birds and marine mammals following BSH standards.

At the time of appraisal, the Project's EIA process is still ongoing and a final integrated approval, including the assessment by the competent authority on significant effect on Natura 2000 sites, is expected to be granted by the end of 2022.

The promoter has a very good understanding of regulatory and environmental monitoring requirements, as well as relevant experience in implementing mitigating measures during construction from its previous offshore wind farms in the same area. In light of this, the promoter's environmental capacity is considered adequate.

The grid connection, comprising an offshore converter station as well as two HVDC export cables of 600 kV (DC) at a distance of over 120km subsea from the converter station to the landfall at Hilgenriedersiel and 110km underground from Hilgenriedersiel to the grid connection point Garrel/Ost near Cloppenburg, is implemented by the responsible Transmission System Operator (TSO) outside the scope of the Bank's financing. It is, however, associated infrastructure to the project.

Subsea and cable transmission lines fall under Annex II of Directive 2014/52/EU amending the EIA Directive 2011/92/EU. The TSO has prepared two separate EIA reports, separately for the onshore and onshore parts, that have undergone public consultations.

The impacts of the offshore converter station are similar to those of the windfarm and are similarly mitigated. For the offshore cable connections impacts on the seabed and benthos are assessed to be minor. At landing the cable crosses the SCI Nationalpark Niedersächsisches Wattenmeer (SiteCode: DE2306301), protected under the Habitats Directive, and the SPA Niedersächsisches Wattenmeer und angrenzendes Küstenmeer (SiteCode: DE2210401), protected under the Birds Directive. The environmental documentation includes appropriate assessments. While the impact on the SPA is considered low, impacts on the sand dunes of the SCI are mitigated by directional drilling under as well the island of Juist as the landing at Hilgenriedersiel. The documentation concludes that the cable will not have significant effect on the Natura 2000 sites.



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Impacts of the onshore cable are low and the routing is chosen to avoid Natura 2000 areas, with no effect on them.

The onshore part has received its planning permission by the Regional Authority in Lower Saxony in March 2022. The offshore part is permitted, including the assessment by the competent authority on significant effect on Natura 2000 sites, separately by the same Regional Authority in Lower Saxony for the part within the 12 nautical miles from the seashore and by BSH for the Exclusive Economic Zone outside the 12 nautical miles. These permits are pending and also expected by the end of 2022.

Climate Assessment

The project has been assessed for Paris alignment and as an offshore wind farm it 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 Paris Alignment for Counterparties (PATH) Framework

The Bank foresees two possible finance contracts with different borrowers.

The first counterparty EnBW Energie Baden-Württemberg AG is in scope and screened in to the PATH framework, as it is considered high emitting and highly vulnerable. The company's decarbonisation plans have been rated on 31 March 2021 by the Transition Pathways Initiative as 'aligned'. EnBW is in line with PATH framework low-carbon and resilience requirements.

The second counterparty is also in scope but not known for the time being. It is expected to be a financial institution and needs to meet the appropriate requirements under the PATH framework as a condition to loan signature.

EIB Carbon Footprint Exercise

The direct CO2 emissions of an offshore wind farm are deemed 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 Germany the total relative effect of the project is a net reduction in CO2 equivalent emissions by 2118 kt CO2e/a.

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.

Conclusions and Recommendations

The legal framework and procedures under the German BSH permitting procedure are considered to be comprehensive and robust to not carrying out a detailed sustainability proofing.

The Project is considered acceptable for Bank financing from an environmental perspective subject to the following conditions:

- The final BSH permit for the project, including the confirmation by the competent authority that the project will not have significant effect on the Natura 2000 sites, is to be issued and in force prior to loan signature (with electronic copy submitted to the Bank);
- The final permits, including the confirmation by the competent authority that the project will not have significant effect on the Natura 2000 sites, for the offshore parts of the grid



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connection to be issued and in force prior to loan signature (with electronic copies submitted to the Bank);

• The Bank has to complete the PATH assessment of the financial institution that will be the ultimate owner of the borrower.