



European Investment Bank (EIB)

Luxembourg, 23/12/2022

Environmental and Social Completion Sheet (ESCS)¹

Overview

Project Name:	ENEDIS ADVANCED METERING
Project Number:	20150516
Country:	FRANCE
Project Description:	ENEDIS' investments in advanced metering infrastructure during the period 2016-2020.

Summary of Environmental and Social Assessment at Completion

EIB notes the following Environmental and Social performance and key outcomes at Project Completion.

The Project was implemented with a non-material change in the project scope. Initial approval in November 2016 was encompassing only the deployment to be undertaken over the period 2016-2019. However, the rollout of advanced meters by ENEDIS continued until the end of 2021 and therefore an additional senior debt facility was granted to finance part of the capital expenditures incurred in 2020 (not included in the original period) in relation to the same project (c. EUR 744m corresponding to the installation of 6.8 million additional electricity meters).

The project was not subject to an Environmental Impact Assessment per Directive 2011/92/EU. The telecommunication system uses PLC2 protocols for the communication between meters and concentrators and GPRS3 networks for the communication between concentrators and IT systems. The project is in line with the national and EU standards.

The main impacts of the project relate to electromagnetic radiation and to the disposal of the old meters being substituted by this project. Tests carried out by the promoter indicate that the PLC communication of the Linky meters does not increase the public exposure to electromagnetic radiation.

Three independent public bodies have issued reports and opinions on the levels of electromagnetic fields created by Linky meters: ANFR, ANSES and CSTB. Their publications have confirmed the very low impact of the Linky meter on the electromagnetic environment, with exposure levels well below the maximum thresholds authorized by the standards in force.

1) National Frequency Agency (ANFR)

The ANFR carried out several studies confirming that exposure levels to electromagnetic radiation from Linky meters are very low and remain well below regulatory limits and ICNIRP reference levels.

- Technical report on the levels of electromagnetic fields created by Linky meters [2016]:
- Analysis of measurements of public exposure to radio frequency waves from Linky meters carried out between June and December 2018" [October 2019]:
- Study of public exposure to radio waves: "Analysis of the results of measurements of public exposure to radio frequency waves from Linky meters carried out in 2020 as part of the national monitoring system".

¹ The template is for ILs and FLs



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All ANFR publications relating to Linky meters are available at the following link:
<https://www.anfr.fr/controle-des-frequences/exposition-du-public-aux-ondes/compteurs-communicants/measures-linky/>

2) French Agency for Food, Environmental and Occupational Health & Safety (ANSES)

The ANSES confirmed and published further assessment as foreseen in the ESDS. Opinion "Exposure of the population to electromagnetic fields emitted by 'smart meters'" [June 2017, revised version of the version of the opinion of December 2016]:
<https://www.anses.fr/fr/system/files/AP2015SA0210Ra.pdf>

3) Scientific and Technical Building Center (CSTB)

It CSTB issued a report "Assessment of the exposure of the population to electromagnetic fields emitted in housing by Linky electricity communicators" [January 2017]:
<https://www.anses.fr/fr/system/files/AP2015SA0210Ra-Anx1.pdf>

Several associations and organisations lodged an appeal to the French highest Court for administrative justice – Conseil d'Etat – against the ministerial Order dated 04/01/2012 on electricity advanced metering systems. One of the subjects of the claims was the exposure to radio waves produced by advanced meters and potential risks to health.

Regarding data privacy issues, the French data privacy authority – CNIL – published a set of recommendations 12 in November 2012. These recommendations were taken into account by the promoter to develop the Linky programme. In November 2015, CNIL issued a positive opinion on the processing of load curve data.

Litigation before the administrative courts continued during the implementation period but fell substantially in 2021. In 2021, cases in summary proceedings have however still been brought before the courts following appeals brought by Enedis against municipal decisions refusing the deployment of meters: in addition to litigation in progress, several appeals and interventions have been initiated by Enedis. At the same time, the volume of these anti-Linky municipal acts decreased significantly in 2021: very few new decrees or deliberations were adopted by local authorities in the past year.

Finally, and in general, the case law can be considered as stabilized since two decisions of the Council of State of 2019 ("municipality of Bovel" and "municipality of Cast"), the administrative judge almost systematically giving reason to Enedis (few rejections were due to invalid deliberations).

The promoter is certified to meet ISO 9001 and 14001. The promoter has developed an environmental management plan and has established an action plan to follow up its implementation.

Summary opinion of Environmental and Social aspects at completion:

EIB is of the opinion based on reports from the promoter, that the Project has been implemented in line with EIB Environmental and Social Standards, applicable at the time of appraisal.