



Luxembourg, 14 December 2022

Environmental and Social Data Sheet

Overview

Project Name:	PROJECT JUSTICE (SA)
Project Number:	20210233
Country:	FRANCE/GERMANY
Project Description:	The promoter is a listed drug discovery focused pharmaceutical company with multiple products under development either on a standalone basis or through partnerships in the areas of neuroscience, diabetes, pain and inflammation, oncology, infectious diseases, respiratory, and fibrosis. The EIB loan will support (i) the R&D efforts of the promoter and (ii) the extension of the existing pharmaceutical manufacturing plant, with the construction of a new unit dedicated to biologic production.
EIA required:	yes
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 project concerns investments in research and development activities carried out by the Promoter and its partners in existing facilities without changing their already authorised scope. The research and development activities of the project do not fall under either Annex I or Annex II of the EIA Directive 2011/92/EU amended by Directive 2014/52/EU.

In addition, the project involves also the expansion of the pharmaceutical manufacturing facility of the Promoter located in Toulouse, France, with the construction of a new unit dedicated to biological production. As this activity is covered in the Annex II of the EIA Directive 2011/92/EU amended by Directive 2014/52/EU, an Environmental Impact Assessment was prepared and submitted to the competent authority by the Promoter in the first half of 2022. The building permit was obtained on 24th August 2022 and the start of work took place on 29th August 2022.

The EIA included *inter alia* the impact of the new facility on the environment, the surroundings and the biodiversity of the site, as well as other risks such as safety and climate risks. Mitigating measures have been identified to cope with local requirements, such as on planning, water treatment, waste management, climate and atmosphere protection, etc.

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.



Luxembourg, 14 December 2022

Albeit the new construction remains below the threshold for the EIB Carbon Footprint Exercise, a greenhouse gas emissions calculation was carried out by the Promoter, following the recommendations of the MRAe (*Mission Régionale d'Autorité Environnementale*, part of the *Ministère de la Transition Écologique*). Among the different measures identified to reduce the climate impact, the Promoter is committed to produce up to approx. 700 MWh/year of electricity with photovoltaic panels and install heat recovery systems up to approx. 500 MWh/year. The additional measures identified for the facility are expected to allow the Promoter to obtain the LEED Silver certification for the construction at project completion.

The site where the new biological plant will be constructed is close to Natura 2000 sites. A biodiversity study has been carried out in the context of the EIA, and it has evidenced that the Project is not expected to generate major impacts on biodiversity.

In addition, the site is subject to flooding risk. Consequently, within the EIA the Promoter identified several mitigating measures to be implemented to reduce its exposure to such risk, notably in relation to the building layout, storage, location of utilities. Moreover, the risks of drought (relatively moderate) and landslide (following earthquake, considered low) have also been taken into account in the design of the new facility.

EIB Paris Alignment for Counterparties (PATH) Framework

The counterparty is in scope and screened out of the PATH framework, because it is not considered high emitting and having high vulnerability.

Public Consultation and Stakeholder Engagement

The EIA was subject to public consultation, which was carried out during the Summer of 2022 and it involved both local institutions as well as the general public.

The remarks that emerged during the public consultation were related to flooding and GMO contamination risks, as well as the size of retention ponds. Such concerns have been addressed by the Promoter through the design of the plant and its safety systems.

Other Environmental and Social Aspects

The Project makes a significant contribution to the realisation of UN Sustainable Development Goals (SDGs), notably SDG 3 - Ensure healthy lives and promote wellbeing for all at all ages, SDG 9 - Infrastructure and industrialisation and SDG 17 - Partnerships for the goals.

Regarding the Promoter's capacity, the Promoter will leverage on its knowledge and experience in the pharmaceutical sector, as well as on the collaborations and partnerships with other industry players, research centres and academic institutions.

Conclusions and Recommendations

The project concerns investments in research and development for which no significant impact on the environment is expected. Moreover, the project also supports the expansion of the pharmaceutical manufacturing capacity of the Promoter, notably in relation to the construction of a new plant for biologicals in France, which required an Environmental Impact Assessment



Luxembourg, 14 December 2022

The Bank has reviewed the environmental and social capacity of the Promoter, including its organisation and processes, and deemed them to be adequate and in line with industry standards. In addition, the Bank has reviewed the conclusion from the competent authority, and concur that the new manufacturing facility generates minor negative impacts adequately mitigated.

Considering the above, the project is acceptable for EIB financing from an environmental and social point of view.