

Luxembourg, 11th December 2023

Environmental and Social Completion Sheet (ESCS)

Overview

Project Name:	<i>HERRERA ALLOCATION GREEN ENERGY FL</i>
Project Number:	<i>20200895</i>
Country:	<i>SPAIN</i>
Project Description:	<i>Financing of the Herrera on-shore wind project (63 MW) in the Spanish region of Castilla y León. Allocation under the Framework Loan (FL) 2019-0811 IBERDROLA SPAIN GREEN ENERGY FRAMEWORK LOAN</i>

Summary of Environmental and Social Assessment at Completion

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

The project concerns the construction and operation of the Herrera wind complex, which consists of three wind farms for a total of ca. 63 MW (Huesa with 18 MW, Orbaneja with 31.5 MW and Valdesantos with 13.5 MW), and the associated infrastructure. It is located in the province of Burgos (region of Castilla y Leon), in the municipalities of Estépar, Cabia, Hornillos del Camino, Rabé de las Calzadas, Isar, Frandovínez. The project is using a total of 14 Wind Turbines Generators (WTG) of 4.5 MW each: 4 WTGs for Huesa, 7 WTGs for Orbaneja and 3 WTGs for Valdesantos. Huesa and Orbaneja are located less than 2km from each other, while Valdesantos is located at around 6km south of Huesa and Orbaneja.

An EIA was performed for each wind farm, including public consultation, and the competent authority granted the environmental consents (“Declaracion de Impacto Ambiental” or “DIA”) in June 2007 for Valdesantos and Huesa, and in April 2015 for Orbaneja. The EIAs were however for a larger number of smaller turbines, for a total of 66 WTGs and 116 MW installed capacity. The environmental studies were further updated to accommodate for a smaller number of larger turbines, in line with the development of wind turbine technology in recent years. Those modifications were screened out of EIA process by the competent authority. Nevertheless, the competent authority submitted the modification of the Orbaneja project to a public consultation in June 2019, including a cumulative impact assessment covering also Huesa and Valdesantos. All the environmental consents were updated accordingly in November 2019.

The project started construction in the summer 2020, with commissioning starting in the summer 2021. The project was substantially completed at the end of 2021.

The three windfarms were subject to continuous monitoring programs, as part of the environmental management plans, which included surveys of mortalities during the operational phase.

The DIA of Valdesantos included a condition on the sealing and relocation to a more suitable area of the nearby animal midden located in the municipality of Estépar (to the south of the project), considering the risk that it represented to attract avifauna, as it was set up for feeding necrophagous birds.



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However, by the time the project started the commissioning phase, the midden was still open as no alternative location was defined. Following the field surveys of the Valdesantos project, a high mortality rate was observed during the initial months of (pre)operations. Notably, several fatalities of *Gyps fulvus* (Griffon Vulture – Least Concern as per the IUCN Red List) were found, as well as one fatality of Red Kite (*Milvus Milvus* – Least Concern). The detected fatalities were higher than the rates observed for other windfarms in the same region and deemed to be due to the proximity of the Valdesantos WTGs with the animal midden. Consequently, in March 2022, the competent authority ordered to shut down the three WTGs of the Valdesantos project. It also proposed to close down the animal midden and prohibit its use to dispose rests of animal bodies by the farmers. As mortalities were also observed by the promoter in Huesa and Orbaneja, although at lower rates, the promoter is self-imposing a restriction since November 2022, shutting down the WTGs under certain conditions. The monitoring reports for the second half of 2022 indicate that no collision was detected in November and December 2022.

After the shutdown order, corrective measures were discussed with the competent authority and the farmers, including the installation of closed container bins in the animal midden and agreement with farmers for the management of their animal wastes and bodies by specialized companies to avoid uncontrolled animal rests, which gather birds close to the wind turbines. In October 2023, the promoter reported the finalisation of the sealing of the midden, including the cleaning of the area, the collection of the dead animal rests, and the plantation of trees suitable for the local climate. The objectives are to avoid the attraction of scavenger birds and increase the biodiversity in the region.

At the time of writing this report, the promoter has submitted reports to the competent authority on the implementation of those corrective actions, including the sealing of the midden, which are being reviewed by the authority. The promoter expects that, having implemented the agreed measures, Valdesantos will be able to restart operations by the end of 2023 and expects similarly to lift the self-imposed restriction for Huesa and Orbaneja. The confirmation from the competent authority is pending.

The promoter was requested to demonstrate that the measures foreseen in the environmental management plans, including measures to avoid, reduce and mitigate the impact, as well as monitoring indicators, were put in place during the construction and operational phases. The promoter reported that the measures have been implemented and shared the monitoring reports presenting the implementation of the measures. During the implementation phase and the first year of operation, no significant environmental or social issues were noted besides the high mortality rate mentioned above, which will be monitored by the Bank in the course of 2024 (including regarding the confirmation of the competent authority to restart the Valdesantos project).

Summary opinion of Environmental and Social aspects at completion:

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