

Luxembourg, 14th April 2025

Environmental and Social Data Sheet

Overview

Project Name: CAPARACENA ALLOCATION REPOWEREU FL
 Project Number: 2023-0900
 Country: SPAIN
 Project Description: *Financing of the Caparacena (330MWp), Tagus (379MWp), Cofrentes 1 (184MWp) and Ayora (182MWp) solar photovoltaic. Second allocation under the framework loan (FL) IBERDROLA REPOWEREU FRAMEWORK LOAN (2022-0896)*

EIA required: yes

Project included in Carbon Footprint Exercise¹: yes

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

Environmental and Social Assessment

The Project is an allocation named CAPARACENA ALLOCATION REPOWEREU FL under the operation IBERDROLA REPOWEREU FRAMEWORK LOAN (2022-0896). The Project consists of the construction and operation of four solar photovoltaic plants (Caparacena, Tagus, Ayora and Cofrentes I) and other ancillary facilities as described below, such as transmission lines, substations and access roads, for a total capacity of ca. 1075MWp.

The project has been assessed for Paris alignment and is considered to be aligned both against low carbon and resilience goals in line with the policies set out in the Climate Bank Roadmap and the Bank's Energy Lending Policy.

Environmental Assessment

CAPARACENA

Plant name	Technology	Capacity (MW _p)	Province (NUTS-3)	Municipality
Caparacena	Solar PV	329.79	Granada	Cacín, Ventas de Huelma, Chimeneas, Cijuela, Láchar, Pinos Puente, Valderrubio, Íllora y Atarfe

The scheme is located in Spain in Granada, region of Andalucía (NUTS-2).

The overhead transmission line of 20km in 220kV is in this case included under the Annex I of the EIA Directive (Directive 2014/52/EU amending the EIA Directive 2011/92/EU) therefore subject to an EIA, while the generation plant and the other facilities of the project are under Annex II. Both elements of the project were subject to EIA process under the transposed legislation and included in the same EIA process, including public consultation.

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.



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The environmental permit (*DIA: Declaración de Impacto Ambiental*) was obtained on January 2nd, 2023. The EIA report and assessment process included the solar generation facility and the following electrical infrastructure:

- Solar plant substation named “SET FV Caparacena 30/220 kV” located in the area of the PV plant, collecting the energy from the inverters of the plant.
- Transmission line 220 kV of 30.5km, 20 km of them overhead and four segments underground for a total length of 10,498 km, from “SET FV Caparacena” to “SET Promotores Caparacena 400kV”.
- Electrical substation “SET Promotores Caparacena 400kV” shared with other plants in the area.
- Transmission line at 400kV, with a length of 222,70 m between “SET Promotores Caparacena 400kV” and the connection point at the grid in an existing substation called “ST Caparacena 400kV” property of the transmission system operator.

General quality of the EIA report is considered acceptable in terms of the impact assessment methodology and the studies and fieldwork conducted. The EIA report includes a cumulative impacts assessment taking into account the neighbouring solar plants and transmission lines.

Allegations presented during the EIA process, focusing in the most important potential impacts of the project, which (apart of the usual impacts of construction works) are those referred to the affection of the plant to avifauna, in particular to areas included in the Steppe Birds Conservation and Recovery Plan. The authorities considered the allegations presented during the EIA process, addressing them with mitigation measures.

The DIA reinforces some of the measures proposed by the Promoter in the EIA report, mainly by reducing the footprint of the project and modifying the layout, to enhance the protection of bird species that could be potentially affected, and to avoid interferences with a protected area under the RENPA (Network of Protected Natural Areas of Andalucía). The closest Natura 2000 area is ca.10km and the area of the project.

The DIA excludes some areas of the plant falling under the PRAE (Steppe Bird Recovery Plan of Andalucía), setting different additional measures to protect birds like the Little Bustard (*Tetrax tetrax*) which is in Near Threatened status of conservation and the Spanish Imperial Eagle (*Aquila adalberti*), in Vulnerable status., e.g. requiring to re-establish a suitable rainfed arable crop habitat for steppe birds, requiring building underground a part of the transmission line (ca. 10km) and to improve other suitable areas (located out of the PRAE zone) for those types of birds to mitigate the use of the land by the PV plant. The DIA, among these and other measures, requires specific actions to facilitate the nestling of Spanish Imperial Eagle including tagging and radiotracking.

Regarding flora and community interest habitats, the DIA requires to avoid any affection to habitats of community interest, specifically by mapping the area 1520 Iberian gypsum vegetation (*Gypsophiletalia*) and by ensuring that the design of the plant does not overlap that habitat.

With the measures proposed in the EIA report and those required by the DIA, the scheme is expected to generate acceptable impacts during both construction and operation phases.

TAGUS

Plant name	Technology	Capacity (MW _p)	Province (NUTS-3)	Municipality
Tagus	Solar PV	378.95	Cáceres	Alcántara

The scheme is located in Spain in Cáceres, region of Extremadura.



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The project is included in the Annex II of the EIA Directive (Directive 2014/52/EU amending the EIA Directive 2011/92/EU) and the project has followed an EIA process under the transposed legislation, including public consultation.

The environmental permit DIA was obtained on January 23rd, 2023. The EIA report and assessment process includes the solar generation facility and the following electrical infrastructure:

- Underground 30kV lines from the inverters to the existing adjacent substation "SET FV Tagus IV" 30/400kV.
- Two transformer bays 30/400kV "SET FV Tagus IV" as an extension of an existing substation shared with other promoters.

General quality of the EIA report is considered acceptable in terms of the impact assessment methodology and the studies and fieldwork conducted. The EIA report considers the cumulative impacts and synergies with other neighbouring solar plants.

No allegations were received during the public information period of the EIA process.

Environmental impacts related to construction works are mitigated with a set of measures on soils, water, flora, fauna, landscape, cultural heritage and public domain assets measures.

The most relevant potential impacts to flora and fauna of the project are those related with affection to sensitive habitats and protected species.

Regarding to flora, the EIA report gives specific attention to Habitats of Community Interest (HCI) 3170 (Mediterranean temporary ponds), 6220 (Xeric sand calcareous grasslands), 3150 (Natural eutrophic lakes with Magnopotamion or Hydrocharition-type vegetation), 6310 (Dehesas with evergreen Quercus) 5330 (Thermo-Mediterranean and pre-desert scrub).

The DIA includes several protection measures to avoid and mitigate impacts to HCI, e.g. requiring excluding the project from areas with vegetation associated to a HCI, marking out the areas, enhancing the natural development of those habitats, avoiding destruction of protected species, specific grazing rules and in the case of Quercus ilex plant double of new bushes compared to the number affected.

Regarding to fauna, the greatest potential impact comes from the reduction of habitat for different species, mainly birds (both steppe birds and birds of prey). To mitigate these potential impacts, the EIA report and the DIA establish several measures. These measures include habitat improvements, scheduling of works including biological stoppage during reproductive period to be agreed with the authority for the most sensitive areas, noise reduction, traffic measures to avoid collisions with reptiles, permeability of fences, land custody agreements for the common crane (*Grus grus*), measures to reinforce the population of the lesser kestrel (*Falco naumanni*) and roller (*Coracias garrulus*), rabbit breeding as food for birds of prey, ponds for steppe birds and black storks (*Ciconia nigra*), a 5-year research project on the sandgrouse (*Pterocles alchata* and *Pterocles orientalis*) and Eurasian thick-knee (*Burhinus oedicephalus*), camera-trapping studies of steppe birds, periodic monitoring in the project area to study and monitoring of amphibians, among others. All these species are in Least Concern status of conservation excepting the *Pterocles orientalis* which is Endangered.

According to the EIA report, the project area is located within the Natura 2000 SPA and SAC "Llanos de Alcántara y Brozas" (ES0000369). In addition, adjacent to the project, there are the Natura 2000 SAC "Cedillo and Río Tajo Internacional" (ES4320002) and the SPA "Río Tajo Internacional y Riberos" (ES0000368), whose area partially overlaps with the Tajo Internacional Natural Park which is in the vicinity.

The EIA report includes an assessment of the impact on Natura 2000 sites, concluding that with the mitigation measures foreseen the project is compatible and is not affecting negatively to the protected areas. The competent authority issued the DIA on that basis, considering that the project is compatible and in line with the conservation plans of the sites, provided that the mitigation measures proposed in the studies and other additional measures are met (as required in the DIA):

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specific agri-environmental measures for the preservation of Little Bustard (*Tetrax tetrax*, in Vulnerable status of conservation) and other steppe birds, measures in favour of Montagu's Harrier (*Circus pygargus*, in Least Concern status of conservation), and specific authorization requirements for new roads.

With the measures proposed in the EIA report and those required by the DIA, the project is expected to generate acceptable impacts during both construction and operation phases.

COFRENTES I

Plant name	Technology	Capacity (MW _p)	Province (NUTS-3)	Municipality
Cofrentes I	Solar PV	184.27	Valencia	Ayora, Zarra, Jarafuel, Jalance y Cofrentes

The scheme is located in Spain in Valencia, Comunidad Valenciana (NUTS-2).

The scheme falls in this case under the Annex II of the EIA Directive (Directive 2014/52/EU amending the EIA Directive 2011/92/EU) and have been screened in based on thresholds under the national legislation, related to the area occupied by the project, therefore have been subject to an EIA process, including public consultation. The environmental permit DIA was obtained on December 28th, 2022. The EIA report and assessment process covered the solar generation facility and the following electrical infrastructure:

- Solar plant substation named "ST La Oliva" 30/132 kV located in the area of the PV plant, collecting the energy from the inverters of the plant.
- Transmission line 132 kV of ca. 21 km in total, from "ST La Oliva" to "ST ICE Cofrentes" also named "ST Cofrentes Renovables", 132/400 kV kV.
- Electrical substation "ST ICE Cofrentes" 123/400 kV.
- Transmission line at 400kV, with a length of ca. 0.9 km between "ST ICE Cofrentes" and the connection point at the grid in an existing substation called "SE Cofrentes 400kV" property of the transmission system operator.

General quality of the EIA report is considered acceptable in terms of the impact assessment methodology and the studies and fieldwork conducted. The EIA report includes a cumulative impact assessment considering the neighbouring solar plants.

The competent authority considered the allegations presented during the EIA process, in line with the relevant legal framework, that were addressed mainly through the modification of the path of the transmission lines in 132kV and 400kV.

The transmission line in 400kV (ca. 0.9 km), the SET Cofrentes Renovables and 7km of the transmission line in 132kV are inside the SPA ES0000212 "Sierra de Martés - Muela de Cortes". From those 7km of the transmission line in 132 kV, 6km are also overlapped over the SAC ES5233012 «Valle de Ayora y Sierra del Boquerón».

The SAC ES5233012 Valle de Ayora and Sierra del Boquerón, has presence of Iberian gypsum vegetation (*Gypsophiletalia*) (HCI 1520*) and the presence of endemic plant species (*Limonium cofrentanum*, *L. lobetanicum*, *L. sucronicum*) along with pine forests and different types of basophilic scrub.

The SPA ES0000212 Sierra de Martés - Muela de Cortes, has populations of birds of prey as the Short-toed snake-eagle (*Circaetus gallicus*), Golden eagle (*Aquila chrysaetos*), Bonelli's eagle (*Aquila fasciata*), Booted eagle (Booted eagle), Peregrine falcon (*Falco peregrinus*) and Eurasian eagle owl (*Bubo bubo*). There is also presence of European roller (*Coracias garrulus*), Black wheatear (*Oenanthe leucura*) and Red-billed chough (*Pyrrhocorax pyrrhocorax*). All those species are in Least Concern status of conservation.

The area of the solar plant does not overlap any Natura 2000 area.

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In addition to general mitigation measures and conditions of the EIA report and DIA on soil, landscape, water and heritage, in order to protect flora, the main measures required are related to the avoidance of the HCI 1520* in design phase and during construction period by identifying and signalling those areas. In addition, new suitable areas must be prepared in a proportion 1:2 to those inevitably affected.

Regarding fauna, the main measures and conditions are aimed to avoid construction activities during reproductive period (March to June), to ensure permeability of the fenced plant, to build underground the transmission line 132kV between towers 33 to 44, to create eight new fenced vegetation islands of 100m² each promoting propagation of native species and to create five ponds to shelter amphibious.

The DIA considers that with the measures of the environmental reports and those new required, the transmission line will not generate significant negative effects as it is affecting only a very small portion (less than 0.025%) of the total extension of this habitat in the SAC ES5233012.

Regarding the SPA ES0000212, the potential impacts from the overlap between the line and the SPA, especially regarding the breeding areas of Golden eagle and Bonelli's eagle, are mitigated by the proposed measures in the EIA report and those measures additionally required by the DIA, especially by building underground a part of the transmission line.

With the measures proposed in the EIA report and those required by the DIA, the project is expected to generate acceptable impacts during both construction and operation phases and will not be affecting the integrity of the Natura 2000 areas.

AYORA

Plant name	Technology	Capacity (MW _p)	Province (NUTS-3)	Municipality
Ayora 1	Solar PV	181.9	Valencia	Ayora

The scheme is located in Spain in Valencia, region of Comunidad Valenciana (NUTS-2).

The scheme fall under the Annex II of the EIA Directive (Directive 2014/52/EU amending the EIA Directive 2011/92/EU) and based on thresholds under the national legislation, related to the area occupied by the project, have been screened in, therefore being subject to an EIA under the transposed legislation, including public consultation.

The environmental permit DIA (Declaración de Impacto Ambiental) was obtained on January 10th, 2023. The EIA report and assessment process includes the following infrastructure:

- The solar PV generation facility called "Ayora 1" with a medium voltage underground line 30 kV to the substation "Oliva 30/132 kV"
- Modification of the substation "Oliva 30/132 kV" to receive the energy from the plant

All the other electrical infrastructures required to connect this plant to the grid are included and assessed under the EIA process for project Cofrentes I, which shares with Ayora the following common elements: part of substation Oliva, transmission line in 132 kV from Oliva to "SET Cofrentes renovables" substation, substation "SET Cofrentes renovables" and transmission line in 400kV from "SET Cofrentes renovables" to the interconnection point in an existing substation owned by the system operator.

The competent authority considered the allegations presented during the EIA process, in line with the relevant legal framework. General quality of the EIA report is considered acceptable in terms of the impact assessment methodology and the studies and fieldwork conducted. The EIA report includes a cumulative impacts assessment taking into account the neighbouring solar plants and transmission lines.



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In addition to the general measures proposed in the EIA report and required by the DIA on soil, landscape, water and heritage, the most important mitigation requirements regarding flora and fauna are those enhancing the protection of bird species that could be potentially affected by the project. These measures exclude one of the zones proposed for the project (the part overlapping SPA ES0000452 "Meca-Mugrón-San Benito") and in particular, require considering the area around each colony (500m radius) of Lesser kestrel (*Falco Naumanni*) located closer than 4km from the plant. If a colony is inside the perimeter of the plant, that area must be free of solar trackers. The available suitable area for feeding those colonies must be studied and quantified, so the cumulated area of the project in relation to the area of feeding habitat for this species is not above 5%. If this limit is exceeded, the promoter must create new suitable feeding areas for the exceeded amount according to the prescriptions of the DIA. The fulfilment of this requirement must be monitored over time and adjusted if necessary.

Additional measures and conditions are imposed by the DIA, among others, the execution of an equivalent forest plantation of the affected areas of Aleppo pine, holm oak and Juniper, the creation of a semi extensive breeding centre for wild rabbit and pigeon, as food for Bonelli's eagle and for Western marsh-harrier (*Circus aeruginosus*), perform a five-years monitoring study of the objective species of the SPA (i.e. Lesser kestrel, Little bustard, Black bellied sandgrouse (*Pterocles orientalis*) and Great Bustard (*Otis tarda*)) including the location of individuals, feeding and nestling areas, and the preparation in certain conditions of new areas as useful habitat for breeding of Lesser Kestrel. The DIA also requires performing a communication program about renewable energy and the SPA «Meca-Mugrón-San Benito» that must be implemented during five years.

With the measures and conditions proposed in the EIA report and required by the DIA, the project is not expected to damage or harm the integrity of the SPA and it is expected to generate acceptable impacts during both construction and operation phases.

EIB Carbon Footprint Exercise

In accordance with the Bank's current Carbon Footprint methodology, the total relative effect of the project is a net reduction in CO2 equivalent emissions by ca. 539 kt CO2-eq/yr.

For the annual accounting purposes, the project emissions will be prorated according to the EIB lending amount signed in that year, as a proportion of project cost.

EIB Paris Alignment for Counterparties (PATH) Framework

As assessed under the framework loan *IBERDROLA REPOWEREU FRAMEWORK LOAN 2022-0896*, the counterparty is not involved in incompatible activities, and it already meets the requirements of the EIB PATH framework with its existing alignment plan.

Social Assessment, where applicable

Reports are pointing out the possibility of use of forced labour in the supply chain of PV modules. The promoter has a Policy on Respect for Human Rights rejecting the use of any form of forced or compulsory labour and has reinforced its assessment process on supply chain sustainability, including on key aspects like forced labour and ethical practices.

The promoter shall make reasonable efforts to assess and address the labour risks associated with the solar PV panels used in the project, including throughout the supply chain, as required by the applicable provisions of the relevant labour standard of the Bank.

The promoter has made reasonable efforts to perform such due diligence for the modules used for Tagus and Caparecena. For Cofrentes and Ayora, the modules have not been purchased yet



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and the due diligence, to be performed, will be reported to and reviewed by the Bank.

For Caparacena PV project, the Promoter has reached agreements with all the owners of the necessary lands for the plant, while in the case of the transmission line, not all the needed lands are already contracted by mutual agreements and some expropriations may be required.

All the land rights required for Tagus PV and most of the land rights required for Cofrentes and Ayora and their ancillary infrastructure have been agreed with the owners.

Public Consultation and Stakeholder Engagement

Public consultations have been carried out and the allegations have been addressed under the EIA process.

The Promoter has open channels in place to contact on sustainability and environmental matters (www.iberdrola.com/contact and medioambiente@iberdrola.es).

Conclusions and Recommendations

The operation is acceptable in Environmental, Climate and Social terms under the following conditions which supplement those already defined for the Framework loan as a whole:

- The promoter undertakes to only resort to launching expropriation procedures in the case where a voluntary agreement cannot be reached with landowners.
- Regarding Ayora and Cofrentes, the promoter shall make reasonable efforts to carry out a due diligence throughout their supply chains, with the aim of avoiding the use of forced labour in the supply chains of the solar panels that will be used for the respective projects to be financed by the Bank. The relevant documentation shall be delivered to the EIB for its review.