

Luxembourg, 28/01/2025

Environmental and Social Data Sheet

Overview

Project Name: LBP EFFICACITE ENERGETIQUE

Project Number: 2023-0270 Country: France

Project Description: Financing of small- to mid-sized energy efficiency projects (including PV integrated and charging stations) undertaken by public sector and non-profit

entities in France.

EIA required: no¹

Project included in Carbon Footprint Exercise²: no

Environmental and Social Assessment

Environmental Assessment

The operation is an intermediated loan 100% dedicated to climate action and environmental sustainability investments undertaken by public entities in France. The sectors targeted include energy efficiency renovations in public buildings and Green Mobility (exclusively charging stations). In addition, heat networks for municipalities will be considered on a case by case basis.

The operation will contribute to the EU energy and climate objectives by supporting investments in energy efficiency and clean mobility and by supporting the implementation of the EU Energy Performance of Buildings Directive (EPBD) and the Energy Efficiency Directive (EED).

The projects are not expected to require an Environmental Impact Assessment (EIA). In any case, under this operation, the FI shall only finance low risk projects which do not require an EIA. The FI shall store and keep the relevant documents updated, including documents supporting the compliance with the environmental legislation. In case the EIB requires such documentation for any of the schemes included in this operation, the FI shall promptly provide all documents requested. In particular, for schemes listed under Annex II of the EIA Directive and not requiring an EIA, the FI shall deliver to the Bank the EIA screening decisions upon request.

Schemes located inside of the Natura 2000 areas and schemes located in the vicinity of Natura 2000 sites which are subject to an appropriate assessment in line with art 6(3) of the Habitats Directive shall not be eligible.

EIB Paris Alignment for Counterparties (PATH) Framework

LBP is in scope of the PATH procedure for financial intermediaries. It already publishes dedicated reporting in line with TCFD recommendations (the 2023 report is available at the following link). It is hence considered to meet the PATH requirements.

¹ On an exceptional basis, a scheme might fall under Annex II of the EIA Directive.

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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Social Assessment, where applicable

The investments will generate social benefits, in terms of alleviating energy poverty, increasing the security of supply and supporting employment generation.

Conclusions and Recommendations

The intermediary has a comprehensive Environmental and Social Management System (ESMS) in place, which comprises adequate policies (with excluded activities) and procedures to identify, assess, manage, monitor and report environmental, climate and social (ECS) risks and impact of the schemes benefiting from EIB support. The FI has integrated the ECS risk assessment into its overall risk management procedures and decision-making process, with responsibilities for implementation assigned in different departments and at top management level. Regular training is provided to employees that are tailored based on their responsibilities for the implementation and oversight of the ESMS. LBP Bank's policies are consistent with EIB's E&S requirements on labour and working conditions and occupational, health and safety.

The FI will fulfil the following undertakings:

- The FI shall ensure that schemes benefiting from EIB support comply with national and EU legislation (where applicable).
- The FI shall only finance low risk projects which do not require an EIA. For schemes
 which fall under Annex II of the EIA Directive and not requiring an EIA, the FI shall
 deliver to the Bank the EIA screening decisions upon request.
- The FI will be required to undertake reasonable efforts to ensure that the projects it finances are screened for any labour issues in the solar PV supply chain, and will endeavour where possible to cascade down similar requirements in its finance contracts. In line with this, the FI, inter alia and on reasonable efforts basis, will require the promoters to obtain, where practically achievable, supply chain mapping of the PV module manufacturers reaching the level of silicon/polysilicon suppliers and/or declarations by the PV module manufacturers concerning the origin of the components used in the PV modules, per project.

Under these conditions, the project is considered to be acceptable for Bank financing from an environmental and social compliance perspective.