



Environmental and Social Data Sheet

Overview

Project Name:	Atlas Iberia RE Green Loan – Brazoinves I
Project Number:	2020-0839
Country:	Spain
Project Description:	Project Brazoinves I, a solar PV plant part of the financing of a portfolio of greenfield onshore wind and solar PV projects in Spain and Portugal

EIA required: yes (simplified)

Invest EU sustainability proofing required: yes

Project included in Carbon Footprint Exercise: yes

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

Environmental and Social Assessment

The Brazoinves I Project consists of the construction and operation of a solar photovoltaic (PV) plant with a total capacity of 40.5 MWp located near the town of Brazatortas, province of Ciudad Real, region of Castilla-La Mancha. The project scope includes the associated infrastructure for the grid interconnection.

The Project’s point of interconnection to the grid is the Brazatortas 220 kW substation owned by Red Eléctrica de España (REE), with a grid limitation of 30 MWac.

The interconnection is composed of the following:

- Approx. 1 km of 30 kV underground line from the Project area to the SE 2 Colectora 220/30 kV substation, located next to the Project area on the east side;
- The SE 2 Colectora 220/30 kV substation and the 400m 220 kV overhead line shared among six projects, to the SET Brazatortas substation owned by the grid operator REE, which is the point of connection for the Project.

Environmental Assessment

Since the installed capacity of the Project is below 50 MW, it is subject to the regional environmental procedure. According to Spanish law ‘Ley 4/2007 Evaluación Ambiental de Castilla-La Mancha’, the Project is subject to a simplified environmental assessment procedure, meaning that no screening decision by the Competent Authority in line with Directive 2014/52/EU amending the EIA Directive 2011/92/EU is required.

An Environmental Impact Study (EIS) was carried out in 2020/2021 covering PV plant and interconnection infrastructure. The Project then obtained the environmental



decision/permit (Declaración de Impacto Ambiental - DIA) on 10th December 2021, for the PV plant and its power evacuation infrastructure.

The general quality of the EIS report in terms of the impact assessment methodology, desk studies and field work conducted is considered acceptable. The EIS also includes a cumulative impact assessment considering neighbouring infrastructure, including other solar PV plants and transmission lines.

The EIS concludes that the impact of the project is acceptable during both construction and operational phases, provided that the preventive and corrective measures defined are implemented.

The Project is found not to have any significant impact on avifauna, flora and landscape, and also on soil, air quality, and the local population. The Project (including interconnection infrastructure) is not located within any protected area such as Natura 2000, and is not within an area of influence of any protected area. The closest protected area is the *Sierra Morena (Natura 2000)*, located 9 km to the south of the Project.

Mitigation measures defined in the EIS were further complemented by conditions of the environmental permit and can be summarised as follows:

- The inclusion of a vegetation display around the PV Plant perimeter, revegetation of internal areas, and installation of ecological corridors to reduce habitat fragmentation.
- Temporal ponds to be protected to support amphibian reproduction.
- Anti-collision devices on overhead lines, bird-friendly infrastructure, and measures to promote regional bird species.
- Earth movement, dust emission, noise, and light pollution should be minimized.
- Traffic within the site is limited to 20 km/h.
- Proper waste management and archaeological supervision are mandated.
- The perimeter fencing will be bird-safe, with a maximum height of 2 meters.
- Annual bird monitoring shall be performed during the first five year of operation.
- The vegetation within the PV Plant perimeter should be controlled, ideally through sheep grazing.
- All types of waste should be treated and managed according to current legislation.
- Light pollution should be minimised.

The EIS report and environmental permit cover the entire lifecycle of the Project, including the decommissioning phase, with the aim to reinstate the Project area to its original state. All remaining materials, waste, or excess soil shall be managed by an authorized waste manager appropriate for the nature of each type of waste. Restoration shall include the attempt to maintain the terrain's original topography. The soil extracted during the construction phase will be stored for later use during restoration of degraded areas. The decommissioning shall not affect the implemented vegetation screen and the planting, nor other complementary measures for birdlife habitat improvement. Disposal of all waste generated during the project life, including the decommission phase, shall be subject to the relevant Spanish legislation.

EIB Carbon Footprint Exercise



In accordance with the Bank's current Carbon Footprint methodology, it is calculated that, based on the avoidance of electricity generation from a combination of existing and new power plants in Spain (combined margin for intermittent generation), the total relative effect of the project is a net reduction in CO₂ equivalent emissions by ca. 23.8 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.

Climate Assessment

The Project substantially contributes to the climate change mitigation objective. The Project has been assessed for Paris alignment and is considered to be aligned both against low carbon and resilience goals against the policies set out in the Climate Bank Roadmap and the Bank's Energy Lending Policy. Residual risks from physical climate hazards are deemed low.

Social Assessment, where applicable

The vast majority of the land required for the Project was either leased or purchased by the promoter. The promoter also applied for the public utility declaration ("DUP / Declaración de Utilidad Pública") which is required for starting any expropriation procedure. This declaration was granted on 17/05/2023.

In Spain, the land needed for any project considered of public utility can be expropriated; the expropriation is carried out by the relevant authorities in the interest of the promoter.

Public Consultation and Stakeholder Engagement

A 30-day public consultation process was carried out as part of the regional environmental procedure ('Ley 4/2007 Evaluación Ambiental de Castilla-La Mancha'). No further stakeholders engagement activities were undertaken.

Other Environmental and Social Aspects

Recent reports are pointing out the possibility of use of forced labour in the supply chain of solar PV panels. The promoter has robust human and labour rights policies in place, rejecting the use of any form of forced or compulsory labour. Such policies also put the same obligations on suppliers and sub-suppliers.

An enhanced forced labour due diligence was carried out by the promoter on the modules' supply chain up until polysilicon level, confirming that none of the components and sub-components are manufactured in a high forced labour risk area.

The project shall also comply with the EIB Environmental and Social Standards, which foresee a zero tolerance for the use of forced labour.

Conclusions and Recommendations

The Project has obtained the required environmental permit and construction permit for the solar PV plant and its power evacuation infrastructure. The related Environmental Impact Study was carried out.



The Project is expected to have limited social and environmental impact, provided that all mitigation measures, as included in the EIS and environmental permit, are implemented.