



Environmental and Social Data Sheet

Overview

Project Name:	Atlas Iberia RE Green Loan – Trevago 1
Project Number:	2020-0839
Country:	Spain
Project Description:	Project Trevago 1, 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 Trevago 1 Project consists of the construction and operation of a solar photovoltaic (PV) plant with a total capacity of 31 MWp located near the town of Matalebreras, province of Soria, region of Castilla y Leon. The project scope includes the associated infrastructure for the grid connection.

The Project’s point of interconnection to the grid is the Trevago 220 kV substation owned by Red Eléctrica de España (REE), with a grid limitation of 24.5 MWac.

The interconnection is composed of the following:

- 30 kV underground line from the Project area to the Trevago Promotores 220/30 kV substation, located less than 1 km from the Project area;
- The Trevago Promotores 220/30 kV substation and the 4 km long 220 kV overhead line shared among six projects, to the Trevago 220 kV 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 the regional law of Castilla y Leon ‘*Decreto Legislativo 01/2015*’, dated 12 November, the Project is subject to a simplified environmental impact 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. However, the promoter decided to undergo the ordinary environmental impact assessment procedure.



An Environmental Impact Study (EIS) was carried out in 2020 covering PV plant and interconnection infrastructure, and the Project obtained the environmental permit (Declaración de Impacto Ambiental - DIA) on 5th April 2022, 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, corrective and compensatory measures defined are implemented.

The Project (including interconnection infrastructure) is not located within a protected area such as Natura 2000. The closest protected area is the *Quejigares y encinares de la Sierra del Madero (Natura 2000)*, located over 3 km away of the PV plant area. No material impact is anticipated on such protected area.

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

Preventive and corrective measures:

- Complete undergrounding of the 30 kV overhead line from the PV Plant up to Trevago Promotores 220/30 kV substation.
- The works will be carried out at periods when farmers and stockbreeders are least affected by works.
- Anti-collision devices for birds (white rectangular plates) shall be installed on all fencing, at least one per span, when the distance between posts is 3m or less.
- Prior to the start of the work, a search will be carried out to detect the presence of fauna within the Project site.
- If nesting sites or refuges are detected during the wildlife research, the works shall begin outside the breeding period of the species identified, when these are included in the Catalogue of Protected Species.
- Nesting boxes for raptors should be installed in suitable locations in and around the Project site.
- Sponsor shall define and implement a compensatory measures plan, in coordination with the environmental body, which shall be approved by the administration prior to the start of construction (see below).
- Works shall be avoided between 1st April and 31st July to avoid coinciding with the breeding period of the *Circus pygargus*.
- If work begins before 1st April (PV Plant early works started prior this date), *Circus pygargus* will not yet be established in the study area, therefore, the impact on this specie will be practically negligible.
- Planting of the following tree species: 27 *Quercus ilex* and 23 *Crataegus*.
- Planting of 3.5 ha of vegetation consisting of blackthorn, *lavandulifolia* sage, gorse and wild rose.
- Two “majanos” (stone piles refuges) will be created.
- Five platforms will be installed to encourage the breeding and rearing of the *Falco tinnunculus*.



- Fencing shall allow the passage of small animals.
- An environmental monitoring plan (*Plano de Vigilancia Ambiental*) shall take place at all stages of the project.

Corrective measures:

- Restoration of fishermen's refuge on the Abión River.
- Tri-annual support for the breeding of *Circus pygargus* and *Circus cyaneus* avoiding mortality.
- Environmental improvement and fencing of wood in the "Fuencaliente" pit.
- Acquisition of 2 complete boats for monitoring, control and sampling of species in rivers and reservoirs in the province of Soria.
- Forestry treatments for the improvement and conditioning of public woodland in nearby areas.
- Actions to disseminate and publicise the Protected Natural Areas of Castilla y León.
- Creation of a water point for fires in Suellacabras.
- Preliminary clearing, profiling with motor grader and compacting with roller for the repair of 18 km of forest tracks.

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 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. 17.8 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.

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 20/09/2023.

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 public consultation process was carried out as part of the regional environmental procedure (*Decreto Legislativo 01/2015* de Castilla y Leon). 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 and construction permits 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.