

Luxembourg, 22.05.2025

## Environmental and Social Data Sheet

### Overview

Project Name: ARKEA RENEWABLE ENERGY II FL  
 Project Number: 2024-0563  
 Country: France  
 Project Description: The project consists of an intermediated loan in support of small to mid-sized renewable energy projects in France, carried out by private entities.  
 EIA required: Some of the underlying schemes will require an EIA.

Project included in Carbon Footprint Exercise<sup>1</sup>: no  
 (details for projects included are provided in section: “EIB Carbon Footprint Exercise”)

### Environmental and Social Assessment

#### Environmental Assessment

The proposed operation consists of a Framework Loan (FL) to Crédit Mutuel Arkéa (“Arkéa”) as Financial Intermediary (FI). The loan is for an amount of up to EUR 300m to support private promoters of small and mid-sized photovoltaic and onshore wind projects (but possibly also energy storage), in their development and implementation in France.

The project is in line with the Bank’s priority lending objectives for renewable energy (RE) and energy efficiency (EE) and supports the Climate Action objective (100%). The operation would contribute to EU energy objectives.

For all schemes included under this operation, the FI applies a comprehensive ESG policy, including reporting and monitoring, making available to the public annual reporting on sustainable activities. The capacity of the FI to carry out environmental and social assessment of projects in line with the Bank’s requirements and the national legislation has been appraised and is deemed satisfactory. Most of the RE individual schemes to be financed are likely to have limited negative environmental impacts / temporary inconveniences due to construction works (dust, noise), which are expected to be mitigated appropriately.

Due to their technical characteristics, some of the renewable energy investments may fall under Annex II of Directive 2011/92/EU as amended by EIA Directive 2014/52/EU, leaving it to the national competent authority to determine according to Annex III of the said Directive whether an environmental impact assessment is required. In this case the projects would be required to comply with applicable Environmental Legislation (national, EU and International), including SEA and EIA legislation, where appropriate.

In case an EIA is required, the Bank will require the Financial Intermediary (FI) to store and keep updated any documents that may be relevant for the project (including EIA screening decisions, environmental studies, environmental monitoring reports or equivalent documents) supporting the compliance with the EIA Directive and national environmental regulations, and to promptly deliver such documents to the Bank upon request.

<sup>1</sup> 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 CO<sub>2</sub>e/year absolute (gross) or 20,000 tonnes CO<sub>2</sub>e/year relative (net) – both increases and savings.



Luxembourg, 22.05.2025

The FI, which is known to the EIB from previous operations, will be required to ensure the compliance of all schemes with relevant EU Directives as transposed into national legislation. The FI will be required to verify that none of the schemes has a significant adverse impact on any site forming part of the EU Natura 2000 network (falling under Habitats Directive 92/43/EEC or Birds Directive 2009/147/EC). Schemes with significant negative impacts on areas with high biodiversity value, nature conservation areas, including bird migration routes, shall not be eligible.

### **EIB Paris Alignment for Counterparties (PATH) Framework**

Arkea is in-scope (bank) and screened-in for PATH. Arkea's reporting is in line with TCFD recommendations ([RAPPORT CLIMAT TCFD 2022](#)). Credit Mutuel Arkea is considered to meet the PATH requirements and no additional contractual undertakings are foreseen to be required at this stage.

### **Social Assessment, where applicable**

The FI will be required to undertake reasonable efforts in case of concern to mitigate against the risk of forced labour in the solar PV supply chain. This will include enhanced due diligence where practically achievable and ensuring that relevant obligations are passed on in supplier contracts

## **Conclusions and Recommendations**

The FI is considered to have the expertise and the capabilities to verify the environmental procedures carried out for individual schemes, appropriately addressing environmental issues and ensuring that the schemes to be part-financed under this framework loan comply with national and EU legislation.

- If a scheme falls under Annex I or Annex II of the EIA Directive, the FI shall ensure that the sub-project's promoters comply with the provisions of the EIA Directive as transposed into national law. When relevant, the FI shall deliver to the Bank the EIA report and other relevant environmental documents. For each scheme that may have an impact on a nature conservation site, the Financial Intermediary shall obtain confirmation from the competent nature conservation authority, or an equivalent assessment satisfactory to the Bank, that the scheme does not have a significant negative impact on any site of nature conservation importance.
- The FI will be required to undertake, on a best effort basis, to perform enhanced due diligence of the supply chain of the solar PV module manufacturers (supply chain mapping of the solar 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 sub-project), also guided by the FI's human rights commitment, and ensuring that appropriate contractual provisions are cascaded to contractors/suppliers of the sub-projects.

Under these conditions, the operation is acceptable to the Bank in E&S terms.