

Luxembourg, 15th April 2025

Environmental and Social Data Sheet

Overview

Project Name: *IBERDROLA WIND FARM GREECE*
 Project Number: *2024-0242*
 Country: *GREECE*
 Project Description: The project comprises the construction and operation of a 22.5MW onshore wind farm, located in the regional units of Viotia and Fthiotida, in central Greece.
 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 comprises the construction and operation of a 22.5MW onshore Wind Farm (W/F), including its ancillary infrastructure. The wind farm, namely ‘Gatza W/F’, will be located in the regional units of Fthiotida and Viotia in Greece. The project design consists of 5 wind turbine generators (WTGs) with tower height of 90m and rotor diameter of 150m. The ancillary infrastructure entails (a) ca11km of road network (2km of new roads, and upgrade of 9km of existing roads) and (b) the grid connection, i.e. the connection of the W/F via underground Medium Voltage (MV) cables to a new electricity substation (33/150kV), developed, permitted and currently under implementation by another developer. The substation will be shared with other producers. The substation will be connected via a High Voltage (HV) overhead electricity line to an existing 150kV overhead line (in a loop in-loop out connection) located less than 500m away.

The expected timeframe of implementation of the project is March 2025 to March 2026.

Environmental Assessment

Onshore wind farms fall under Annex II of Directive 2014/52/EU amending (Environmental Impact Assessment) EIA Directive 2011/92/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. The grid interconnection infrastructure is classified as follows: (a) some sections fall under Annex II of the EIA Directive (i.e. 150kV overhead lines) and (b) the new electricity substation and underground cables do not fall under neither of the aforementioned Annexes.

As required by Greek legislation, the wind farm underwent a full EIA process, which has been concluded and the corresponding EIA decision (Environmental Terms Approval (ETA)) has been issued. The permitting process for the grid interconnection infrastructure (substation and HV line) is under the responsibility of another RES producer. The infrastructure, due to its technical characteristics, did not undergo a full EIA process. The relevant environmental

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.



Luxembourg, 15th April 2025

decision, i.e. the standard environmental commitments and measures, as required for projects classified as 'category B' under Greek law, was issued in November 2023 and the required forest intervention permit was issued in April 2024.

As the original design of the W/F has been modified over time, the ETA has been subsequently modified/updated, without triggering the need for a new EIA process.

Based on the relevant EIA conclusions and given the nature and technical characteristics of the W/F, environmental impacts are not deemed significant. They mainly include noise and traffic disruption during the construction, visual impacts, topsoil destruction, impacts on biodiversity, cultural heritage and on landscape. Cumulative impacts with other projects have been considered in the EIA report (including the common infrastructure). A section of the 22.5MW W/F is located on forest land (primarily public). Relevant terms, primarily entailing a reforestation plan, have been imposed in the ETA and in the relevant Forestry Approval.

During the operational phase, impacts mainly relate to shadow flickering, noise emissions, and impacts on avifauna (bird mortality due to collision with the wind turbines). On the basis of the EIA report and the layout included therein, the closest settlement to the project site is located at ca 1.5km, with the next one at ca 4km.

Impacts on avifauna, as well as electro-magnetic radiation are also expected during operation due to the HV equipment (mainly overhead, high voltage electricity lines) connecting the W/F to the electricity grid.

The project is not located in Natura 2000 sites, Important Bird Areas (IBA), RAMSAR or other protected areas. The nearest Natura 2000 site is 'Limnes Yliki and Paralimni' (SAC, GR2410001) at ca. 2 km from the project site. The ETA states that the project does not interfere with Natura 2000 (the site is not located therein). The EIA report concludes on low, local and partially reversible impact on avifauna caused by the W/F and the overhead line during the construction phase. Fragmentation of habitats is not expected.

The EIA report proposes measures to prevent, eliminate, minimise or correct the identified negative impacts. Such measures include, but are not limited to:

- Minimisation/avoidance of dust, systematic irrigation/water spraying of the construction areas; measures to minimise dust during the transportation of materials;
- Waste management, according to national law requirements;
- In relation to the risk of collision for the transmission lines, enhanced visibility marks of overhead lines to reduce avifauna collision risk;
- Minimisation of lighting equipment for the wind turbine generators, to avoid disturbance to birds and people, maintaining flight/aviation safety requirements;
- Undergrounding of all medium voltage electricity network within the site area, to minimise related environmental impact;
- Protection of the historical and archaeological heritage, relevant supervision during the ground works;
- Forest intervention to be minimised as much as possible, with relevant works being conducted strictly in the defined intervention areas; Reforestation works, where necessary;
- Implementation of restoration and revegetation plans, suitable for the specific land use and characteristics, thus maximising the environmental benefit;
- Soil protection/rehabilitation;

The project substantially contributes to the climate change mitigation objective. It has been assessed for Paris alignment and is considered to be aligned with low carbon and resilience goals against the policies set out in the Climate Bank Roadmap and the Bank's Energy Lending Policy.



Luxembourg, 15th April 2025

EIB Carbon Footprint Exercise

The direct CO₂ equivalent emissions from wind farms are negligible.

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 Greece (combined margin for intermittent electricity generation), the total relative effect of the Project is a net reduction in CO₂ equivalent emissions by 21kt CO₂e/yr.

For the annual accounting purposes of the EIB Carbon Footprint, 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

The counterparty -as assessed at Group level-, Iberdrola S.A., is in scope and screened into the PATH framework, because it operates in a high emitting sector. The counterparty already meets the requirements of the EIB PATH framework with its existing alignment plan.

Social Assessment, where applicable

The promoter engages with landowners in order to secure voluntary agreements for the land plots required for all the project-related infrastructure. In the case of the project, the land entailed is public, thus requiring an intervention license to be issued (already available). Securing the land for the grid connection infrastructure (new substation and connection to the existing electricity grid) falls under the remit of the developer that is responsible for the permitting process of the relevant grid infrastructure works.

The promoter sets requirements for all contractors with respect to HSE, for ensuring a high level of health, safety, and environmental performance. Contractors and suppliers are required to comply with the Group's Governance and Sustainability system, the Supplier's Code of Ethics and other corporate policies.

Public Consultation and Stakeholder Engagement

Public consultation was conducted in the context of the EIA processes, as foreseen by national legislation. The promoter engages with stakeholders early in the development process, to anticipate and address any issues raised. The promoter maintains a grievance mechanism during the construction period, setting as a first point of contact the site manager -responsible for the day-to-day works on site-, with grievances escalating to the promoter's headquarters in Athens.

Other Environmental and Social Aspects

The promoter has an in-house team dedicated to the development and permitting of projects, including the oversight of environmental and social aspects. Studies that may be required in the context of permitting processes are conducted in-house or outsourced to relevant specialists and then reviewed internally by the promoter's team.

The promoter has several corporate policies to ensure the quality management of environmental and social aspects of projects, as well as an Environmental and Social Management System applicable to all their projects. The policies of the Group the promoter belongs to, are horizontally applicable to all their projects and cover Health and Safety, Climate Action, Environmental and Social Governance and other topics. The Bank has financed several projects with the aforementioned Group in other European countries. The relevant monitoring experience is good.

In conclusion, the promoter has sufficient capacity to implement the project in line with EIB's E&S requirements.



Luxembourg, 15th April 2025

Conclusions and Recommendations

Under the following conditions, the Project is acceptable in E&S terms for the Bank's financing.

- The promoter shall store and keep up to date all documents relevant for the project supporting the compliance with the provisions of EU environmental legislation, including Habitats and Birds Directives, permits and environmental and social approvals and, where required, social studies, and shall promptly upon request deliver such documents to the EIB.