

Luxembourg, 24th September 2025

Environmental and Social Data Sheet

Overview

Project Name: *Breakwater Genoa*
 Project Number: *20230776*
 Country: *Italy*
 Project Description: *Major allocation under Framework Loan (2020-0263) to finance the expansion and redesign of the exterior Breakwater at the Port of Genoa.*

EIA required: yes
 Project included in Carbon Footprint Exercise¹: no

Environmental and Social Assessment

The Promoter is “*Autorità di Sistema Portuale del Mar Ligure Occidentale*” (AdSP MLO), a public port authority responsible for the coordination and management of the Western Ligurian port system, including several ports such as Genoa, Savona and Vado Ligure.

The project covers the expansion and redesign of the existing exterior breakwater at the Port of Genoa in order to allow larger vessels to berth in more efficient and safe manoeuvrability conditions. It includes the construction of new sections, the demolition of existing sections and the reinforcement of other already existing sections. The configuration of the new breakwater will guarantee a new manoeuvring circle with a 800 m diameter in front of “*Bacino Sampierdarena*”, a new access channel with 2,800 m length and 300 m width to that same area and an internal channel in front of “*Bacino Sampierdarena*” with 400 m width.

The construction works of Phase A of the project will include the construction of approximately 4,010 m of new breakwater sections, the scour protection reinforcement of approximately 765 m of existing breakwater sections and the demolition of approximately 2,200 m of existing breakwater sections. The deepest sections of the new breakwater structure will go up to 50 m depth. The top level of the caissons lays at 3.40 m m.s.l. (7.00 m including crest wall).

Environmental Assessment

The project falls under Annex I of the Directive 2011/92/EU (as amended by the Directive 2014/52/EU) on the assessment of the effects of certain public and private projects on the environment (EIA Directive). The environmental Competent Authority for EIA purposes is the Ministry of Ecological Transition.

An Environmental Impact Assessment (EIA - VIA) was initiated in September 2021 and after a public consultation and integration of comments a Decision was issued on 04th May 2022 by the Ministry of Ecological Transition (now Ministry of Environment and Energy Safety – MASE) in coordination with the Ministry of Culture (Decreto DM_2022-0000045) on the basis of the positive opinion issued by the CT VIA (“*Commissione Tecnica di Verifica dell’impatto ambientale VIA e VAS*”), on 28th March 2022.

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.



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In March 2024, after changes in the technical design of the project, the Promoter submitted a modified project to the Competent Authority to check whether a new EIA procedure would be required. On 30th December 2024, after the integration of additional documents by the Promoter, the Competent Authority issued a Decision (Decreto DM 2024-0000509) confirming that the modification did not require a new EIA procedure.

According to the Environmental Impact Assessment Report and the related Decision, the main environmental impacts can be divided in temporary impacts during the construction and permanent impacts during operation. The ones qualified as significant before the implementation of any mitigation measures include the following: water turbidity; vibration and noise during construction; and limited changes to the sedimentation dynamics in the shoreline.

The main mitigation measures detailed in the EIA Report and the corresponding environmental Decision include: use of adequate equipment and techniques to reduce marine sediments dispersion in the project area; use of adequate equipment and techniques to reduce noise and vibrations that negatively impact marine mammals; transplantation of organisms and biocenoses surveyed in the underwater analyses, including possible restoration actions for any impact on neighbouring valuable biocenoses; countermeasures and rebalancing measures for the potential displacement of cetaceans and damage to mammal eco-location systems caused by the project; rebalancing measures for possible disturbances on cetacean food supply due to disturbance factors caused by the change in hydrodynamic conditions during operation of the project as defined by simulations and modelling studies; and several monitoring plans and exercises. Additionally, in line with circular economy principles, materials resulting from demolition and dredging works are expected to be re-used in different elements of the new breakwater, including for instance: as filling material for the caissons or for the related embankments.

The Project is to be implemented in the vicinity of six Natura 2000 sites. The project site is more than 2,000 m away from the closest Natura 2000 site. The integrity of the sites is not expected to be negatively affected by the project:

- SAC IT1332576 "Fondali Boccadasse – Nervi" (maritime);
- SAC IT1332575 "Fondali Nervi - Sori" (maritime);
- SAC IT1332477 "Fondali Arenzano – Punta Ivrea" (maritime);
- SAC IT1312392 "Tutela del Tursiope Mar Ligure" (maritime);
- SAC IT1331615 "Monte Gazzo" (land based);
- SAC IT1331606 "Torre Quezzi" (land based).

Within the context of the EIA an Appropriate Assessment (V.Inc.A) was done and concluded that the Project impacts generate slight interferences on habitats/species, which do not affect the integrity of the sites and do not compromise its resilience. The conservation state of the habitat or species does not undergo significant variations.

The EIA report includes an analysis of the water bodies quality. The impacted water bodies are the Genova Bisagno (IT07CW_01001015) and Genova Polcevera (IT07CW_01001014_1) and the related impacts are considered as negligible or non-significant. It is concluded that the Project will not interfere with the objectives of the relevant river basin management plan and complies with the requirements of the Water Framework Directive 2000/60/EC and aligns with the Marine Strategy Directive 2008/56/EC objectives.

The Project is expected to contribute to Climate Action (CA) Mitigation by enhancing the Port infrastructure. The Project will thus support a modal shift to less carbon intensive transport modes as they allow scale increase and enhance interoperability between transport modes and hence are expected to reduce the generalised cost of multimodal transport. The Project components can hence be considered as general port infrastructure where modal shift can be demonstrated and supporting intermodality within the transport network.



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According to the Promoter and the available technical design documents, risk assessments and statistical considerations on sea level rise, currents, waves and other meteocean data are incorporated in the final maritime structures design, as required by best engineering practices and enhancing the infrastructure climate resilience. Therefore, the Project also contributes for the CA Adaptation objectives.

Port infrastructure projects are considered to be aligned with the Paris Agreements as per the Climate Bank Roadmap. The port infrastructure is in general compatible with any vessel, independent from its propulsion system.

Public Consultation and Stakeholder Engagement

A public consultation was held during the EIA procedure undertaken in 2021. After the first round of consultation held for 30 days after publication of the related notification (17th September 2021), specific integrations to the EIA were requested by the Competent Authority on the basis of the comments received. After the integrations were implemented, a second round of public consultation was held. The consultations included:

- Publication of the technical project related documents and environmental impact assessment report on the Competent Authority website.
- Submission (by public and/or local authorities/associations) of observations on the Project. These observations were also made available to the public and summarized in the final environmental decision issued by the environmental competent authority (Ministry of Environment) jointly the Ministry of Culture.
- Involvement of local government authorities/Port stakeholders to collect their observations and advice.

Other Environmental and Social Aspects

The Promoter is an experienced port authority responsible for the implementation of several comparable projects in a similar maritime context. The preparation of all the documents related to environmental studies was carried out with the support of external consultants supervised by the Promoter. It is also foreseen that all the environmental monitoring activities required during construction will be undertaken under a similar arrangement.

As per the Promoter's information, the carbon emissions associated to the construction phase are being offset through a Carbon-credit system (under the supervision of both the MASE and an independent certification body).

Conclusions and Recommendations

In this context, the following conditions and undertakings have been defined and shall be applied:

Undertakings:

- The Promoter shall ensure that adequate environmental, social and health and safety management plans, defined according to the legal requirements, are implemented and monitored during the construction of the Project. Additionally, the Promoter shall ensure that the environmental and social mitigation measures will be implemented in accordance with the relevant studies and the corresponding environmental decision. The Promoter will notify the Bank of any unexpected environmental impact or incident during implementation of the Project.



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- The Promoter shall ensure that all the conditions indicated in the environmental decision issued by the environmental competent authority are complied with before, during and after the construction works, as appropriate. For that, the Promoter will seek the required validation ("Verifica di Ottemperanza") from the competent authorities.

Subject to the compliance of the above conditions, the Project is considered acceptable for EIB financing. Overall, residual impacts are considered to be manageable and acceptable.