

Luxembourg, 19.06.2025

Environmental and Social Data Sheet

Overview

Project Name:	ENEL COLOMBIA RENEWABLE ENERGY
Project Number:	2025-0049
Country:	Colombia
Project Description:	The operation is an investment loan concerning the construction of two solar PV projects, Guayepo III and Atlántico, in Colombia.
EIA required:	Yes
Project included in Carbon Footprint Exercise ¹ :	Yes

Environmental and Social Assessment

Guayepo III Solar and Atlántico Solar are two solar PV projects promoted by ENEL Green Power Colombia (ENEL). Guayepo III has an installed capacity of 267 MWp and occupies 688.30 hectares, while Atlántico has a capacity of 254 MWp and occupies 414.78 hectares. Both projects started their construction phase during the second half of 2024, and their full commissioning is scheduled for February (Guayepo III) and July (Atlántico) 2026.

Guayepo III is located within the municipalities of Sabanalarga and Ponedera, Atlántico Department, Colombia. It will be connected to the pre-existing Sabanalarga substation (SE), owned by ISA/Intercolombia. The associated facilities are the new SE El Uvero, a 500 kV electricity transmission line (TL) of 5.92 km, and access roads.

Atlántico is located within the municipalities of Sabanalarga and Usiacurí, Atlántico Department, Colombia. The associated facilities are a 500 kV TL of 3.47 km, the new SE Nueva Estancia, and access roads. Atlántico will also be connected to the pre-existing Sabanalarga SE.

Both projects have all the permits and authorisations that Colombia's national regulatory framework requires. The operation is in line with the EU objectives of sustainable development and Colombia's Nationally Determined Contributions (NDC). It represents 100% Climate Action (Mitigation) and is therefore fully aligned with the Paris Agreement.

Environmental Assessment

The national legislation regarding environmental assessments is based on law 99 General Environmental Law of Colombia, and its Regulations (approved by Decree N° 1076 / 2015 of the Ministry of Environment and Sustainable Development).

Guayepo III underwent an Environmental and Social Impact Assessment (ESIA), approved by Resolution No. 02627 on 2nd November 2022. The ESIA of Atlántico was approved by Resolution No. 01270 on 19th July 2021, and its modification was approved by Resolution No. 01057 on 7th June 2024. The modification of the ESIA led to some changes to the infrastructure² of the project, contemplating the addition of areas with respect to those authorised in Resolution 01270.

Neither project affects protected areas or indigenous lands. Significant impacts are related to the disturbance of habitats of local fauna, alteration of sites with archaeological value, and land

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.

² The main changes are (i) an increase in the area of intervention from 414.78 ha to 435.23 ha, (ii) the introduction of access roads and internal roads, and (iii) the introduction of new ZODME areas. The latter are areas where excess material from excavations is stored.



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leasing. Specific measures in line with the scope of these impacts have been proposed and are being implemented.

Besides this, impacts are typical of this type of intervention, such as generation of dust and noise, atmospheric emissions, third parties' land affectation, and landscape. Management measures have been developed to control such impacts.

The competent authority considered the environmental and social assessment to be in line with the relevant legal framework and thus granted final environmental clearances, permits, and authorisations.

Based on the above, the general quality of the ESIA documentation, in terms of the impact assessment methodology and studies, is considered acceptable and compatible with the requirements of the relevant EIB standards.

Biodiversity

The biotic area of influence is immersed in two life zones: tropical dry forest and tropical very dry forest. The location of Guayepo III and Atlántico does not overlap with vulnerable ecosystems or areas of importance for biodiversity conservation, such as Ramsar or IBA sites, Paramo, Tropical Dry Forest, AICAS, or Biosphere Reserves.

It is worth mentioning that most of the area covered by both projects is located in modified habitats previously used for livestock farming.

Based on studies, species exposed to a certain degree of threat inhabit the project's area of influence. Regarding flora, with Guayepo III 11 species are recognised as Endangered (EN), while with Atlántico one species is considered Endangered (EN) in accordance with the International Union for Conservation of Nature (IUCN).

To manage impacts on flora, the Promoter is implementing a Flora Management Plan that includes enrichment and silvicultural management, rescue and relocation of endemic and endangered flora species found in the intervention areas, and suitable for relocation to equivalent ecosystems. To date, the survival rate of relocated plants is 90% for seedling and sapling species and 70% for vascular epiphytes.

Regarding fauna, according to the Red Book of Reptiles of Colombia (Morales-Betancourt et al., 2015) and Resolution 1912 of 2017 (MADS, 2017), with Guayepo III one reptile species is considered EN, and one reptile is critically endangered (CR). With Atlántico two species are critically endangered (CR). Among the bird species with probable distribution, with Guayepo III one species is considered CR and one species is EN according to the national lists. With Atlántico no species is considered EN or CR. Regarding mammals, with Guayepo III one species is listed as CR according to the IUCN. With Atlántico, no species is considered EN or CR.

In this regard, the Promoter is implementing a Habitat and Fauna Population Management Plan, which includes repelling, rescuing, and relocating fauna exposed to some degree of threat.

In addition, a Biodiversity Offset Management Plan is being implemented on 557.42 hectares for Guayepo III and 490.02 hectares for Atlántico, ensuring no net loss and expecting net gain in biodiversity. Most areas where offsets are being implemented are located outside the project's footprint but within the project's area of influence. In contrast, a minority of areas are located within the land leased in the form of exclusion areas that work as ecological corridors.

Mitigation and compensation measures effectively address the impacts on biodiversity. No residual impacts are expected to result from the projects.

Environment, Health, and Safety

The primary sources of air pollution for Guayepo III and Atlántico are associated with (i) the emission of dust (particulate matter) for earth-removing and the use of rural access roads, and (ii) air emissions generated by the use of vehicles and equipment engines. During the construction phase, water tankers water the roads and work areas to minimise dust and



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emissions in the air. This water is transported from Malambo Atlántico, where it is extracted from the Magdalena River and treated according to the local regulations and permissions.

During the operation phase, a water-cleaning system will be used to clean solar panels. Water will be purchased only from authorised third parties with an environmental licence.

Additional measures to minimise air emissions include periodic mechanical inspections of vehicles, speed limits (up to 20 km) within the project's footprint, and the requirement that the vehicles be no more than six years old.

Noise emission levels are expected to increase due to the use of machinery and vehicular traffic during the construction phase. However, according to noise modelling, the maximum permissible limits are not expected to be exceeded. To mitigate noise emissions, the use of horns is prohibited, and construction activities are only conducted during daytime.

The Promoter has an Integrated Health, Safety, Environment, Quality, and Energy Policy that establishes general guidelines for the projects. The OHS plans are aimed at workers and contractor companies. The accident control registers show zero fatal accidents and zero accidents with lost hours for both projects, demonstrating good safety management performance.

EIB Carbon Footprint Exercise

Guayepo III and Atlántico Solar will not generate significant CO₂ emissions. The estimated net reduction of CO₂ equivalent emissions for both projects is 344 ktCO₂/year. 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 the project cost.

Social Assessment

Guayepo III is located in the Department of Atlántico, in the municipalities of Sabanalarga and Ponedera, while Atlántico is located in the Sabanalarga and Usiacurí municipalities. Guayepo III is near El Martillo, Cascajal, and Santa Rita towns; the nearest town is located 1.5 km away. On the other hand, Atlántico is near Isabel Lopez and Sabanalarga, with the nearest town being 1 km away. Therefore, the risk of dust and noise affecting the population is not significant.

Both projects identified and took photo records of all the dwellings that could be impacted by noise, particulate matter, and increased vehicle traffic to propose remedial measures in case of being affected. To date, there has been no need to activate these measures.

It is anticipated that the workforce will peak at 1,500 for Guayepo III and 900 for Atlántico during the construction phase. The Promoter aims to recruit skilled workers and suppliers from the areas influenced by both projects, while ensuring that all unskilled labour is sourced locally.

Guayepo III's footprint spans six plots leased to a private livestock farming company at market rates, with a 30-year lease expiring in 2054 and an extension option. The farm administrator and his family, the only residents, were relocated to another nearby farm owned by the same company, the former retaining his job.

With Atlántico the land was leased to two families. One family, engaged in extensive livestock farming for export, leased half of their land while retaining enough to continue operations. No workers resided on the leased land. The other family's farm was inactive, with no residents at the time of negotiation. This lease also spans 30 years, expiring in 2053. Consequently, neither project causes physical or economic displacement despite the cessation of livestock activities.

It is worth mentioning that no indigenous people or other vulnerable groups are in the Guayepo III and Atlántico areas of influence.

Regarding patrimonial heritage, a total of 34 sites with archaeological value have been identified within the footprints of both projects. To manage this impact, the Promoter has been implementing an Archaeological Management Plan. Consequently, archaeological materials, primarily ceramic fragments and stone tools, have been recovered from Guayepo III and



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Atlántico. Additionally, over 100 findings have been registered for both projects through the chance-finding procedure

The Promoter has a Human Rights Policy and a Code of Ethics in place. The latter rejects the use of any form of forced or compulsory labour, applicable inter alia to the supply chain of the underlying solar PV projects, in compliance with the applicable provisions of the Bank's relevant E&S standards (including Standard 8 – Labour – of the EIB's E&S Standards).

For this purpose, the Promoter performed supply chain due diligence to mitigate the risk of forced labour in the PV supply chain of the projects. As part of this due diligence, the Promoter obtained a complete mapping of the supply chain of the PV module manufacturers, reaching the level of silicon/polysilicon suppliers, confirming that the component factories of the relevant PV modules are not located in regions with allegations of forced labour. The Promoter is committed to continuing its engagement with the solar PV module manufacturers and their sub-suppliers and reviewing their practices to avoid forced labour in the supply chain.

The Promoter will have to comply with the EIB's E&S Standards, which foresee zero tolerance of forced labour and require Promoters to make reasonable efforts to assess whether labour risks are associated with the primary suppliers of goods and materials essential to both projects' core functions.

Public Consultation and Stakeholder Engagement

Stakeholder engagement began before the start of the construction phase. The public consultation and participation processes were part of the ESIA. The public participation process included public hearings, which took place in three stages during the preparation and approval of the environmental studies.

During the construction phase, the Promoter conducts several engagement activities such as (i) monthly meetings with local authorities and leaders, (ii) implementation of a community grievance mechanism, (iii) installation of an information office, located in Santa Rita for Guayepo III and in Isabel Lopez for Atlántico, (iv) distribution of printed information material, videos and podcasts, (v) use of WhatsApp groups with local organisations, (vi) installation of mobile citizen information points, and (vii) installation of information panels and complaint boxes. The primary concerns raised pertain to employment opportunities and information requirements. No opposition to the projects has been recorded.

As part of its Corporate Social Responsibility, the Promoter supports the communities living in the vicinity of the Projects through capacity-building programmes.

Other Environmental and Social Aspects

The Promoter has an integrated management system through which external bodies audit the proper implementation of ENEL Group's E&S Policy and the relevant management systems. Thus, the Group has obtained and maintained the ISO 9001, ISO 14001, and ISO 45001 certifications. According to the Promoter, both projects will be managed under the framework of the acquired certifications.

Conclusions and Recommendations

Based on the information available, and with appropriate conditions (see below) and monitoring in place, the Guayepo III and Atlántico projects are expected to be acceptable for Bank financing in environmental and social terms:

- The Promoter undertakes to present and make available for publication an Environmental and Social Management Plan (ESMP) for the Atlántico and Guayepo III projects. The ESMP will describe all the mitigation and compensation measures planned for the environmental and social impacts of the project along its lifetime.



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- The Promoter undertakes to prepare and implement an Action Plan for each project, which should provide specific measures to minimise the impacts on sensitive fauna species and ensure net gain in biodiversity.
- The Promoter undertakes to prepare a Cumulative Impact Assessment (CIA) that incorporates the Guayepo I, II, III PV solar and the Atlántico PV solar projects, as an overall cluster. If negative impacts are identified as a result of the CIA, mitigation measures will have to be proposed as part of the ESMP of each individual project.