

Luxembourg, 15/10/2025

Environmental and Social Data Sheet

Overview

Project Name: *LEOPARD NL BATTERY STORAGE*
 Project Number: *2023-0859*
 Country: *Netherlands*
 Project Description: *Construction and operations of 300MW of battery storage assets in the Netherlands.*

EIA required: no

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 consists of the development, construction, operation and maintenance of the first Dutch utility-scale Battery Energy Storage Systems (BESS), a lithium-ion energy storage system with a power capacity of 300 MW and energy capacity of 1,200 MWh.

The project is located in Groningen Seaports (Netherlands), on a former alloy factory site, and its Commercial Operations Date is expected in December 2027.

The project will provide capacity and system services to the national electricity grid. It will improve grid flexibility for integration of renewables and will contribute to the security of supply of the system.

Environmental Assessment

The Project is located on a site that has long been used for industrial purposes. The Project plan area is not within Natura- 2000 or NNN (Natuurnetwerk Nederland) areas.

An environmental permit was granted from Municipality of Eemsdelta on 10 October 2024. According to this, a permit under the Nature Protection Act and an environmental permit for flora and fauna are not required.

A water permit was granted from Water authority (Hunze en Aa's) on 2 July 2024 for the discharge of (possibly contaminated) rainwater to the Oosterhorn waterway.

To support the permit request several analyses have been performed:

- An assessment on protected species of plants and animals published on 5 March 2024, concluded that no protected plant species occur in the plan area. Also no (year-round) protected habitats of animals are present and the plan area is not an essential habitat for protected animal species.
- On 9 October 2023 it was completed a preliminary assessment under the Nature Protection Act: during the construction phase, noise emissions remain within current industrial park standards and no effects on birds or marine mammals due to lighting are expected.
- The emissions generated during the construction of the Project, result in no nitrogen deposition on nitrogen-sensitive habitats in Natura-2000 areas.

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, 15/10/2025

- Light emission from the Project during the construction and operation phases remains within the legal frameworks of the province of Groningen.
- An acoustic assessment was carried out on 6 June 2024 and was submitted as part of the permit application.
- The Project is located in an industrial estate zone under the Noise Pollution Act: the noise emitted by the Project is expected to be within the limits.
- A detailed risk assessment on the compliance with the PGS 37-1 requirements² was carried out: no high risks were identified. A fire safety plan for BESS has been prepared, dated 19 March 2024, describing how the fire safety requirements of the environmental permit are met: the battery management system of the Tesla Megapack 2XL regulates and monitors at the battery cell level, this makes it possible to shut it down immediately and issue an alarm indication in case of an anomaly (faster than smoke-based detection). Further requirements are set in the permit for the emergency plan, like incident scenario descriptions, alarming, access to the premises and response procedures.

As a result of previous assessments, the following mitigation measures have been adopted:

- Work should be carried out outside the breeding season (February 15 to August 15).
- Work should be carried out in one direction so that animals have a chance to flee the site.
- Work should be carried out between sunrise and sunset.
- It must be ensured that during work in the area no breeding birds are present. This can be done by, for example removing all trees/bushes etc. and mowing the area short.
- Supervision/monitoring by a competent ecologist is necessary for activities during the breeding season.

The province of Groningen has indicated (No. 2007-16216/24MB) that for the entire industrial site, venue of the project, there is a case of serious soil pollution due to previous activities in the area. A remediation plan has been submitted as part of the permit application.

According to the soil remediation plan from October 2023, soil reports for the area show that the soil is contaminated mainly with zinc, PCBs, mineral oil and thiocyanates and that the groundwater is contaminated mainly with mineral oil, thiocyanates and fluoride. The soil remediation plan states that the Province of Groningen requires a new soil study presented on February 2025 and an action plan for both historic (before 1987) and new contaminations submitted for approval in March 2025.

Remediation of the full site will be carried out by the contractor and is planned to be finished in September 2025.

Pursuant to the Integrated Environmental Permit, the following key obligations apply for the project in relation to the decommissioning of Project Leopard:

- one year before decommissioning, an updated dismantling plan must be submitted to Municipality Eemsdelta detailing the dismantling costs;
- within three months upon complete or partial cessation of activities within Project Leopard, removing all substances and materials present solely because of the ceased activities in an environmentally hygienically responsible manner in consultation with Municipality Eemsdelta;
- as soon as possible upon the decommissioning of part of Project Leopard, notify Municipality Eemsdelta of such decommissioning; and
- the hazardous waste released during dismantling of the BESS must be delivered to an authorised treatment facility.

² Publication series Dangerous Goods 37-1: Lithium-ion battery energy storage systems) is a guideline to ensure safety of BESS and alignment on national level on the fire safety requirements of systems. The final version of the PGS 37-1 has been published on 22 December 2023 and is expected to be officially embedded into regulation via the Environment and Planning Act (Omgevingswet) in 2026. The guideline focuses on safe handling, fire safety, ventilation, and incident management related to these systems. It aims to minimize risks like fire, chemical reactions, environmental contamination, and health hazards associated with lithium-ion battery storage.

Luxembourg, 15/10/2025

The project has been assessed for Paris alignment and it is considered to be aligned both against low carbon and resilience goals against the policies set out in the Climate Bank Roadmap and in the EIB Energy Lending Policy.

EIB Carbon Footprint Exercise

Absolute GHG emissions of the Project in a standard year of operation are estimated at 12 kT of CO₂e/year, based on round trip efficiency losses from the BESS.

BESS provides flexibility to the system, contributing to increase the share of renewables in the energy mix, its operation will avoid the production of equivalent electricity generation from standard thermal units, avoiding relative CO₂ emissions for 119 kT of CO₂e/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 project cost.

EIB Paris Alignment for Counterparties (PATH) Framework

The Borrowers will be Financial Intermediaries, already identified or to be identify, that are deemed to be meeting PATH requirements.

Social Assessment, where applicable

The project does not entail resettlement nor affect livelihood of local population. The Project has already stipulated a lease agreements for the concerned land for a period of 50 years.

Public Consultation and Stakeholder Engagement

The permit application, the draft decision and accompanying documents were available for inspection at the Municipality of Eemsdelta for 6 weeks from July 25 until September 5, 2024.

During the period of public inspection, oral or written comments could be submitted. During that period, 2 opinions/comments were submitted. The first commenter raised the issue of flood risk and was resolved by sharing the flood risk analysis that was part of the permit application. The second commenter requested the planting of trees and shrubs in the surrounding area. The promoter has confirmed with a letter to the Municipality of Eemsdelta that green areas will be created within the Project area. These comments were taken into account and had no effect on the decision of granting the environmental permit.

Other Environmental and Social Aspects

The promoter has a proven track record in the development and operation of BESS projects.

The promoter is committed to comply with the relevant frameworks, such as the Battery Regulation 2023/1542 and the Directive 2018/851 on waste management. Furthermore, GIGA Storage complies with national regulations on reducing and managing the waste, such as the Dutch Act of Environmental Management (*Wet Milieubeheer*).

In December 2023, the promoter developed its own decommissioning policy, which is aligned with the EU Battery Regulation, ensuring maximum reuse and recycling of batteries at the end of their life. The decommissioning policy focuses on safely disposing of or recycling materials like lithium and cobalt, reducing environmental impact and supporting a circular economy.

The promoter has also obtained the SPO (Second Party Opinion) Green Framework certification, underscoring its coordination with recognized environmental and sustainability standards.

Conclusions and Recommendations

Based on the information available, and with appropriate conditions (see below), the Project is expected to be acceptable in environmental and social terms for Bank financing:

- To provide evidence of the approval from the competent authority of the final soil report and action plan for soil remediation.
- To provide confirmation of the completion of the remediation plan to the satisfaction of the competent authority.