



Luxembourg, 25.03.2026

## Environmental and Social Data Sheet

### Overview

Project Name:	BFCM ACTION POUR LE CLIMAT II
Project Number:	2025-0056
Country:	France
Project Description:	<i>The project consists of an intermediated lending facility in support of small to mid-sized renewable energy projects in France (onshore wind, photovoltaic, geothermal, biomass and biogas).</i>
E&S Risk categorisation	<i>Medium as per paragraph 4.18 of E&amp;S Policy</i>
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

The operation is a Framework Loan (FL) with the Financial Intermediary (FI), La Banque Fédérative du Crédit Mutuel (BFCM). The loan is for an amount of up to EUR 900m to finance renewable energy projects in France focused on solar photovoltaic and onshore wind. The investment costs of the individual subprojects will be up to EUR 80m. The operation will be 100% CAES dedicated.

The operation is in line with the Bank's priority lending objectives for renewable energy (RE). The investments will generate environmental benefits in terms of reduction of air pollutants and GHG emissions, ultimately helping to mitigate climate change.

#### Environmental Assessment

Some of the investments are expected to 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 said Directive whether an environmental impact assessment is required. Most of the individual schemes to be financed are likely to have limited negative environmental impacts, which are expected to be mitigated appropriately. 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 project's compliance with the EIA Directive and national environmental regulations, and to promptly deliver such documents to the Bank upon request.

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, shall not be eligible.

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

The counterparty is a FI in-scope and screened into the PATH framework. The counterparty discloses climate-related matters based on the Task Force on Climate-related Financial Disclosures (TCFD) in its non-financial report for the first time in 2023. Therefore, the FI already meets the requirements of the EIB PATH framework with its existing alignment plans.

<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.



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### **Social assessment, where applicable**

Recent reports are pointing out the possibility of use of forced labour in the supply chain of solar PV panels. The Bank confirms that the FI has an Environmental and Social Management System (ESMS) in place, which includes a Human Rights Policy and a Code of Ethics, rejecting 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 relevant E&S standards of the Bank.

For this purpose and upon the FI's request, the FI or the underlying promoters will be required to undertake, on a best effort basis, enhanced due diligence (supply chain mapping of the 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 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.

### **Public Consultation and Stakeholder Engagement**

For projects subject to an environmental impact assessment as defined by national legislation, the FI shall ensure that public consultation is undertaken in accordance with national legislation and the EIA Directive.

### **Other Environmental and Social Aspects**

The FI has significant experience in financing renewable energy projects in France, especially solar PV and onshore wind ones, and is deemed to have adequate capacity to ensure compliance with the Bank's environmental and social requirements. The FI applies a comprehensive ESG policy, including reporting and monitoring, making available to the public annual reporting on sustainable activities.

The FI will be contractually obliged to ensure that all investments comply with the relevant EU Environmental Directives (e.g. EIA Directive 2014/52/EU amending Directive 2011/92/EU, Habitats Directive 92/43/EEC, and Birds Directive 2009/147/EC amending Directive 79/409/EEC) as well as the E&S national laws and regulations.

## **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.

Projects located inside Natura 2000 sites and projects with significant negative impacts on areas with high biodiversity value shall not be eligible.

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.