



18.03.26

Environmental and Social Data Sheet

Overview

Project Name:	TECH-EU ENI BIOREFINERY SANNAZZARO
Project Number:	2025-0665
Country:	Italy
Project Description:	The Project concerns the conversion of existing plants, part of the refinery located in Sannazzaro de' Burgondi (Italy) into a biorefinery to produce sustainable aviation fuel (SAF), as well as HVO diesel, HVO naphtha and HVO LPG from similar non-food feedstocks.

E&S Risk categorisation High

Project included in Carbon Footprint Exercise¹: yes

(Details for projects included are provided in section: "EIB Carbon Footprint Exercise".)

Environmental and Social Assessment

The E&S risk categorisation has been assessed as High, in line with the EIB E&S policy, because the Project falls under the scope of the Annex I of the Environmental Impact Assessment Directive (2011/92/EU, as amended by 2014/52/EU). As such the Project required the preparation of an EIA study.

Environmental Assessment

The Project involves the construction and operation of a Sustainable Aviation Fuel (SAF) production facility within the existing Sannazzaro de' Burgondi refinery in the Lombardy region, Italy. It will repurpose part of the refinery's infrastructure to develop new biofuel production units.

The facility will utilise the proprietary Hydrogenated Vegetable Oil (HVO) technology "Ecofining", developed by the Promoter in partnership with Honeywell UOP. The unit will have a nominal processing capacity of 550,000 tonnes per annum of certified biomass feedstock, including used cooking oils, animal fats, oily industry residues, and other non-food competing fatty materials. All feedstock will be certified under EU-recognised voluntary schemes in compliance with the sustainability criteria of the Renewable Energy Directive (EU/2023/2413). The SAF produced will contribute to the decarbonisation of the aviation sector and support the objectives of the ReFuelEU Aviation Regulation, notably the increase in SAF production needed to meet mandatory blending targets.

The Project falls under the scope of the Annex I of the Environmental Impact Assessment Directive (2011/92/EU, as amended by 2014/52/EU) and the Industrial Emissions Directive (2010/75/EU). Consequently, its environmental and social (E&S) risk classification is high under the EIB E&S Policy. The Project is also subject to the Seveso Directive, as the Sannazzaro

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.



refinery is classified as a Seveso installation; existing safety measures will therefore apply to the new biorefinery.

Under Italian environmental legislation, the Project is undergoing the Valutazione di Impatto Ambientale (VIA) procedure pursuant to Article 19 of Legislative Decree 152/2006. The competent authority, the Ministry for the Environment and Energy Security, received the environmental permit application on 26 June 2025 and validated it for processability on 18 September 2025. The assessment is ongoing, and a formal decision is expected by the end of the first quarter of 2027.

The Project site is located within an industrial area and outside any biodiversity-sensitive zones, including Natura 2000 sites. A Natura 2000 screening study has nevertheless been submitted as part of the permitting documentation. No significant impacts on nearby biodiversity sites are anticipated, given their distance from the refinery.

Overall, the Project is expected to generate significant positive indirect environmental impacts. By producing substantial quantities of SAF, it will enable considerable GHG emission reductions compared to conventional jet fuel. In addition, the Project supports the circular economy by valorising fatty residues, such as used cooking oils, into high-quality, low-carbon biofuels, encouraging their collection and recovery instead of disposal.

EIB Carbon Footprint Exercise

The Project's absolute annual emissions in a standard year of operation are estimated at 1,510 kt CO₂e/year, including Scope 1 emissions (direct process emissions), Scope 2 emissions (indirect emissions from feedstock logistics and energy consumption), and Scope 3 emissions (associated with the energy required to compensate for the biomass feedstock used in the facility, which could otherwise be burned directly for energy recovery). When compared to the baseline scenario—defined as the production of an equivalent volume of fossil-based fuels (SAF, LPG, and naphtha)—the Project is expected to yield substantial CO₂e emission reductions.

Based on the Bank's carbon footprint methodology, the Project is estimated to deliver annual emission savings of approximately 977 kt CO₂e. For the purposes of the EIB Carbon Footprint exercise, the Project's emissions will be prorated according to the share of EIB financing signed in the given year relative to total Project cost.

EIB Paris Alignment for Counterparties (PATH) Framework

The counterparty ENI is in scope and screened in the EIB PATH framework as it is active in a high-emitting sector.

The counterparty is engaged in activities that are considered incompatible with the Paris Agreement in the PATH framework. Because the counterparty seeks financing for renewable energy projects in support of the REPowerEU Plan and does not plan new greenfield investments in coal power plants or mines, it can be supported by the EIB.

The counterparty already meets the requirements of the EIB PATH framework with its existing alignment plans.

Social Assessment, where applicable

The Project is located in Italy, and therefore it will comply with all the applicable labour and social legislation of the country, as well as international conventions and charters, in line with EU standards.

Public Consultation and Stakeholder Engagement

A public consultation was conducted as part of the VIA environmental permitting procedure, starting on 18 September 2025, the date on which the EIA documentation was published on the Ministry's website, and remaining open for 30 days. All submissions from the public and



institutional stakeholders were made publicly available on the Ministry's website. No observations were received from the general public; however, several comments were submitted by local and national institutional stakeholders, including the Lombardy Region and the Istituto Superiore di Sanità (ISS). The Promoter is currently addressing these comments, which include, inter alia, the preparation of a public health impact assessment (VIS – Valutazione di Impatto Sanitario) as requested by the ISS.

Other Environmental and Social Aspects

The Promoter has an established integrated health, safety, environmental and quality (HSEQ) management system. This includes relevant set of certifications in relation to reduction of energy (ISO 50 001), environmental (14 001), quality (ISO 9 001), health & safety (ISO 45 001) management, ISO17025: GHG emissions verification and an Eco-Management and Audit Scheme (EMAS).

Conclusions and Recommendations

Undertakings

The Promoter shall:

- Provide to the Bank the environmental permit issued by the competent authority as soon as this is available.
- During Project implementation, notify the Bank of any modification, extension, or change to the Project that may trigger an EIA or IED permitting process pursuant to Directive 2014/52/EU (amending Directive 2011/92/EU) and Directive 2010/75/EU, and shall submit the corresponding environmental assessment documentation to the satisfaction of the Bank.

Subject to fulfilment of the above contractual conditions, the Project is deemed acceptable for Bank financing from an environmental and social perspective.