

Annex to the guarantee request from	
Sustainability Proofing Summary¹	
The summary ² is in line with the sustainability proofing guidance and should be presented only for direct financing.	
Identification of the project	
Project total cost (exclusive of VAT):	<input type="checkbox"/> below EUR 10 million <input checked="" type="checkbox"/> equal to or higher than EUR 10 million
If the project is exempted from screening/proofing based on the threshold, please mention this together with a short confirmation of legal compliance	
EIA Directive	
	<input type="checkbox"/> Annex I projects (EIA required) <input type="checkbox"/> Annex II projects (screening) <input checked="" type="checkbox"/> EIA required (project screened in) <input type="checkbox"/> EIA not required (project screened out) 2014 EIA Directive applicable <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Sustainability proofing process	<input checked="" type="checkbox"/> Climate <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Social
Climate Dimension	
	<p>The project falls under Annex II of the EIA Directive 2014/52/EU amending the Directive 2011/92/EU and requires an Environmental Impact Assessment (EIA). The operation was subject to an EIA in accordance with the EIA Directive.</p> <p>An assessment of climate adaptation and mitigation aspects has been carried out in accordance with the 'Technical guidance on sustainability proofing for the InvestEU Fund', using due diligence materials, EIA documentation, and NIB in-house expertise.</p> <p>The planned energy production capacity is 264 MW. This is composed of 40 wind turbines. Based on the analysis of the infrastructure type and geographic area of the project, and considering climate sensitivity, exposure, and vulnerability aspects, there are no potentially significant (medium or high), as defined in the 'Technical guidance on sustainability proofing for the InvestEU Fund', climate risks warranting detailed analysis.</p>

¹ In line with Article 8 (5) of the InvestEU Regulation and the sustainability proofing guidance ([C\(201\)2632 final](#)).

² In line with section 3.2 of the Investment Guidelines, the sustainability proofing summary shall be made public after the Investment Committee has approved the use of the EU Guarantee for a specific operation (with due regard to rules and practices regarding confidential and commercially sensitive information)

	<p>In-built mechanisms (for instance, wind turbine stopping at high wind speeds) and good operational practices help mitigate climate adaptation related risks.</p> <p>A carbon footprint assessment was performed according to International Financial Institution Framework for a Harmonised Approach to Greenhouse Gas Accounting GHG emission calculation and takes into account project’s third-party wind yield analysis (P90). The carbon footprint assessment is required as the project is classifiable under the category ‘Renewable sources of energy’ and the carbon footprint assessment shows that avoided GHG emissions are greater than 20 kt CO2e per year, reaching 205 kt of CO2e annually (based on P90 estimations).</p> <p>The monetary value of GHG savings per year equals the estimated shadow cost of carbon for the specific year (€/tCO2e) times the estimated GHG savings (tCO2e). The estimates for shadow cost of carbon are from “EC technical guidance on climate proofing of infrastructure 2021-2027” and EIB’s “Climate Bank Roadmap 2021-2025”.</p> <p>The project is compatible with EU climate neutrality targets, as it would help to avoid GHG emissions. Typical asset lifespan for wind farms 30 years, meaning that the project infrastructure might also operate beyond 2050, still providing renewable energy.</p> <p>Since the vulnerability to climate adaptation risk is assessed Low as per the ‘Technical guidance on sustainability proofing for the InvestEU Fund’, no further climate adaptation risk proofing has been performed as per the Guidance.</p>
Environmental Dimension	
	<p>The project has undergone the EIA as per requirements (screened in). The operation is not considered as a plan/programme/strategy at local, regional or national level. The operation does not fall in the scope of the Habitats and Birds Directives, the Water Framework Directive, Seveso-III directive, Industrial Emissions Directive and all necessary permits are in place.</p> <p>The assessment of environmental dimension was carried out according to the Technical guidance on sustainability proofing for the InvestEU Fund, using due diligence materials, EIA documentation, and NIB in-house expertise. During the environmental screening several relevant environmental impacts were analysed in detail as they entail residual risk, namely, biodiversity and noise & flickering.</p>

	<p>The project by its design proposes mitigation measures for noise and flickering assessment:</p> <p><u>1. Flickering</u> Technical DD report shows that some turbines could cause flickering over 30 annual hours of flickering. Therefore, shadow shut-down measures are required to be implemented.</p> <p><u>2. Noise</u> Noise level assessments concluded that no excessive noise level will be experienced due to the operation of the wind farms. The noise level outside the sanitary protection zone does not exceed 45 dBA (normative noise limit for the nighttime). 2 turbines will be operated on reduced noise mode.</p> <p><u>3. Biodiversity (birds and bats)</u> In 2021, first field observations of nesting / migrating birds and bats were carried out. EIA foresees several mitigation measures (such as installation of new nesting sites outside the Project area for birds of prey and bats, installation and maintenance of bases/platforms for white storks, etc.) and requirement to provide detailed plan for implementation of all biodiversity conservation measures to be prepared in coordination with the regional nature parks. The bird and bat monitoring program is prepared.</p> <p>To ensure risks mitigation, further regular monitoring shall be ensured. The project implementing parties will work on additional remediation measures according to the factual impact monitoring, if necessary.</p>
Social Dimension	
	<p>An assessment of social impacts was carried out according to the ‘Technical guidance on sustainability proofing for the InvestEU Fund’, using due diligence materials and NIB in-house expertise. The operation has a low risk of negative social impacts.</p> <p><u>Labour and working conditions, and occupational and public health, safety and security:</u> During the procedures of EIA and public health impact assessment, the developer has assessed that all social impacts are in line with national legal requirements and international standards. The local Environmental Protection Agency (EPA) also concluded that the construction of the wind park would meet the public health and civil safety requirements insofar as conditions listed in the EPA decision are fulfilled.</p> <p><u>Protection and inclusion of vulnerable persons and/or groups:</u> No loss of livelihood or other risks related to vulnerable people and groups is expected due to the operation.</p>

	<p><u>Gender equality:</u> We could not identify any risks related to gender equality.</p> <p><u>Land acquisition and expropriation:</u> Land lease agreements have been signed with private landowners. A consent from a land owner is required for establishing a sanitary protection zone, as it imposes some restrictions on the activities in the area (no residential or public developments are allowed). No loss of livelihood is expected due to the establishment of sanitary protection zones, as these are planned in mainly agricultural areas and will allow continuation of agricultural activities. Monetary compensations for establishing sanitary protection zones as well as necessary easements were offered to the land owners and agreed on individual basis during the individual meetings with the owners. Such consents and compensation agreements were obtained during the planning stage of the Project.</p> <p><u>Protection of cultural heritage:</u> Environmental Protection Agency (EPA) concluded that the construction of the wind park would meet the cultural heritage protection requirements.</p> <p><u>Stakeholder engagement:</u> Stakeholders and impacted community have been identified and engaged in the decision-making process (EIA stage). Proposals from public were received during the preparation of EIA program. Justified proposals were addressed during the preparation of EIA report. No official comments have been received from the public during the consultation processes established upon adoption of the EIA conclusion by the EPA as stipulated in the order of the minister of environment on the approval of the procedure for public information and participation in the environmental impact assessment process. Concerns and questions by the public were addressed during the public meeting related to the approval of EIA report.</p>
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