

E&S Eligibility Criteria for Onshore Wind Power sub-projects/sub-investments

The Environmental and Social (E&S) eligibility criteria herein have been prepared to assist and to support EBRD's partner Financial Intermediaries (FIs) who are considering the provision of financing to sub-borrowers/investees for onshore wind power sub-projects/sub-investments.

These criteria set out the specific environmental and social criteria for FI sub-projects/sub-investments involving onshore wind power to qualify for green finance attribution. As such, these criteria correspond to the requirement established in EBRD ESR9 for Financial Intermediaries, which states that "EBRD may require FIs to adopt and implement environmental and social requirements, depending on the nature of the FI, its business activities, and the level of environmental and social risks and impacts associated with its portfolio and sub-Projects, as applicable." Prior to approval for inclusion under EBRD proceeds, all onshore wind power sub-projects/sub-investments are subject to review by EBRD's Environment and Sustainability Department against these criteria.

In the following, the term "sub-project/sub-investment" refers to the wind power sub-projects/sub-investments considered for financing, including all of its associated facilities as defined by the EBRD 2024 Environmental and Social Policy (ESP). This typically includes – but is not limited to – access roads, temporary sites and the connection to the grid. It also includes the supply chain to the sub-project/sub-investment, as defined by ESR1 of the EBRD 2024 Environmental and Social Policy (ESP).

The "sub-project/sub-investment" includes four temporal elements: 1) planning and siting of the facility, 2) construction, 3) operation and maintenance, and 4) decommissioning. All four elements are discussed herein. This is specific to new or "greenfield" Sub-project/sub-investment and extensions to or remodelling of existing facilities.

The term "developer / sponsor" refers to the sub-borrower/investee that owns the sub-project/sub-investment and receives indirect EBRD financing.

The eligibility criteria below are organised with reference to EBRD Environmental and Social Requirements (ESRs), as defined in the EBRD 2024 Environmental and Social Policy. The key issues identified are typical of sub-projects/sub-investments and technologies used in constructing an onshore wind power sub-project/sub-investment but may not be exhaustive. Proposed sub-projects/sub-investments that use atypical construction or operation methods may require additional evaluation.

EBRD ESP 2024	Issue	Eligibility Criteria	Evidence
ESR1: Assessment and management of environmental and social risks and impacts	Wind farm developments need to be approved in the local development plan, and local zoning needs to allow for wind farm development.	- The local development plan allows for wind farm development and a strategic study has been undertaken of the area to allow wind farm development. - Public consultation will be / has been conducted in accordance with national requirements	- The developer / sponsor has undertaken a planning assessment, and the local development plan has been changed (if necessary) to allow for the construction of wind farms. - Evidence of public consultations of the change to the local development plan allowing for wind farm development - In case of encroachment or anticipated impact of the sub-project/sub-investment (the plant or its grid connection) on a Natura 2000 site, an Appropriate Assessment must be prepared in line with The Birds Directive (Directive 2009/147/EC), The Habitats Directive (Directive 92/43/EC) and The Bern Convention (June 1979).
ESR1: Assessment and management of environmental and social risks and impacts	The sub-project/sub-investment (the plant or its grid connection) may fall under the Category A list set out in Annex B of the EBRD ESP (2024). Note that large-scale wind power installations for energy production (wind farms) with significant environmental or social impact are designated as Category A under Annex B of the EBRD ESP (2024).	The developer / sponsor has assessed and demonstrated that the sub-project/sub-investment: - Is not planned to have or likely to have a perceptible impact, including cumulative impact, on sensitive locations of international, national or regional importance - Will not result in significant adverse social impacts to local communities or other sub-project/sub-investment affected parties.	- The developer / sponsor has established and maintained an Environmental and Social Management System (ESMS) appropriate and commensurate with the level of its environmental and social impacts and issues in line with Good International Practice (GIP). - If the sub-project/sub-investment falls under Category A, the developer / sponsor will conduct an Environmental and Social Impact Assessment which meets the requirements of the EBRD ESRs 1-8 and 10.

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		- Will not involve significant involuntary resettlement or economic displacement. - Will not result in significant cumulative impacts in combination with impacts from other existing facilities, reasonably foreseeable developments and/or unplanned but predictable activities enabled by sub-project/sub-investment that may occur later or at a different location.	Under EBRD ESR9, FI financing of any Category A Sub-project/sub-investment is subject to referral to EBRD.
ESR1: Assessment and management of environmental and social risks and impacts	Many wind farms are developed without due consideration of cumulative impacts resulting from existing developments.	- Each new wind farm has to take into account the local conditions and baseline data, including already constructed, under construction and permitted wind farms developed by other developer / sponsors. - An assessment must be made of the cumulative impact of the existing and planned wind farms in the area.	The developer / sponsor can demonstrate the overall cumulative impact of wind farms in the region and what is the carrying capacity of wind turbines in terms of environmental, social and infrastructure impacts.
ESR1: Assessment and management of environmental and social risks and impacts	<i>Regulatory Compliance:</i> Turbines construction may be (or may have been) permitted to proceed without the required studies and permits.	The facility will comply / complies with the requirements of national environment, health and safety and labour laws and, in case of category A, with applicable EBRD Environmental and Social Requirements 1-8 and 10.	- The developer / sponsor has undertaken a full Environmental and Social Impact Assessment (ESIA) where required by national authorities, EBRD Category A Project requirements or under EU EIA Directive (Directive 2014/52/EU), and that ESIA has been disclosed to the public in accordance with national, relevant EU requirements and EBRD ESR10. - The developer / sponsor has undertaken any other studies as required by national or local authorities.

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			The developer / sponsor has obtained the required licences/consents and permits to build and operate the facility.
ESR2: Labour and working conditions	Sub-project/sub-investment workers may not be employed in line with national legal requirements, treated fairly or adequately protected.	- An assessment of labour and working conditions has been conducted, including human resources policies, labour management plans, equal opportunity, terms and conditions of employment, and grievance mechanisms. - These aspects should be considered for all sub-project/sub-investment workers, including staff of the developer / sponsor and staff of contractors, sub-contractors, intermediaries and service providers.	- The assessment of human resource and labour management processes for the Sub-project/sub-investment has found no significant gaps. - Processes are in place to identify any emerging or ongoing issues, and to monitor if management measures are effective.
ESR2: Labour and working conditions	<i>Labour management procedures:</i> The developer / sponsor must establish labour management procedures which are contractually binding on sub-project/sub-investment contractors and sub-contractors, ensuring that all sub-project/sub-investment workers receive written employment documentation, and have access to an effective grievance mechanism.	- The sub-project/sub-investment implements labour management procedures that ensure compliance with national labour and employment laws, social security laws and any collective agreements to which employing actors on the sub-project/sub-investment (developer / sponsor, contractor, sub-contractor) are a party. - Contractors and sub-contractors are contractually bound to comply with the sub-project/sub-investment's labour management procedures, national labour and employment laws, social security laws and any	Human resources and labour management requirements have been identified through an assessment process, human resource and labour management policies, plans and processes are in place that address all labour management planning components, including those of contractors, subcontractors, and intermediaries, with no significant gaps.

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		applicable collective agreements, as well as the requirement for a worker grievance mechanism. Worker grievance procedures are documented and tracked.	
ESR2: Labour and working conditions	<i>Supply chain:</i> The wind turbine supply chain, which includes component and turbine manufacturing, may be associated with risks such as forced labour, child labour, and harm to workers.	- Developer / sponsor requires Tier 1 supplier (turbine vendor) to indicate sources of key turbine components that are produced / will be produced for the sub-project/sub-investment. - Developer / sponsor requires Tier 1 supplier (turbine vendor) to specify if key turbine components are fully traceable or not. - Developer / sponsor requires Tier 1 suppliers to implement a Code of Conduct including commitment to zero tolerance of forced labour and child labour, with requirement to cascade to sub-suppliers.	- Developer / sponsor provides all requisite documentation for FI review; FI provides sub-project/sub-investment supply chain documentation for EBRD review. - Developer / sponsor has adequately detailed supply chain mapping and overview of key component supply chain traceability - Developer / sponsor commits to traceability protocols as they become available over time and adopts a supply chain management system (SCMS). - Code of Conduct is adopted by Tier 1 suppliers, with requirement to cascade to sub-suppliers
ESR3: Resource efficiency and pollution prevention and control	The sub-project/sub-investment may, both directly and indirectly, increase local and regional economic activity which can generate increased levels of pollution to air, water, and land, and consume finite resources in a manner that may threaten people and the environment at the local, regional, and global levels.	- The developer / sponsor will adopt technically and financially feasible and cost-effective measures for minimising its consumption and improving efficiency in its use of energy, water and other resources and material inputs and recovering and re-utilising waste materials. - The developer / sponsor will integrate resource efficiency measures and the principles of	- The developer / sponsor has conducted an evaluation of consumables and wastes and has developed a strategy to minimize energy usage and to re-use/recycle waste materials. - The developer / sponsor has anticipated the volumes of wastes he will have to manage, and has a strategy to manage wastes through authorised companies. - The developer / sponsor has anticipated the impacts associated with sub-project/sub-investment construction and

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		cleaner production into product design and production processes.	has identified required mitigation including dust abatement, appropriate excavation material disposal and fertile soil conservation as applicable.
ESR4: Health, safety and security	<i>Workforce Health and Safety:</i> Occupational health and safety hazards specific to onshore wind energy facilities and activities primarily include working at height, working in remote locations and lifting operations. There are also risks relating to inadequate worker accommodation.	• Workforce health and safety assessment includes all sub-project/sub-investment workers, including staff of the developer / sponsor and staff of contractors, sub-contractors, intermediaries, suppliers and service providers. • The sub-project/sub-investment ensures compliance with statutory and collectively agreed occupational health and safety requirements. • The developer / sponsor recognises their primary responsibility to provide safe and healthy working environments for sub-project/sub-investment workers and informing, instructing, training, supervising and consulting sub-project/sub-investment workers on health and safety.	• An assessment has been undertaken of sub-project/sub-investment workforce health and safety issues, risks, and management measures, including risks of inadequate or unsafe worker accommodation, with no significant gaps. • A sub-project/sub-investment specific OSH plan is in place; where appropriate, the OSH plan is integrated into the sub-project/sub-investment ESMS. • Processes are or will be in place to identify any emerging or ongoing sub-project/sub-investment workforce health and safety issues and risks, and to monitor if management measures are effective. • The developer / sponsor has, or will have, a procurement system in place that ensures that contractors abide by the provisions of their health and safety programme and national law.
ESR4: Health, safety and security	<i>Gender-based violence and harassment:</i> Female community members and workers may be at heightened risk of gender-based violence and harassment (GBVH). Risks are heightened at sub-projects/sub-investments situated in remote areas or where there is a significant workforce influx.	• The developer / sponsor will assess sub-project/sub-investment related risks of gender-based violence and harassment (GBVH) to sub-project/sub-investment-affected persons and communities. • Where appropriate, the sub-project/sub-investment has clear	• The assessment of GBVH safeguarding processes for the sub-project/sub-investment has found no significant gaps. • Processes are in place to identify any emerging or ongoing GBVH related issues, and to monitor if safeguarding measures are effective.

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		GBVH safeguarding processes in place, including the provision of confidential channels for reporting incidents and providing support. Where required, the developer / sponsor has relied on work conducted by qualified and experienced specialists to identify and assess GBVH risks.	All site-specific GBVH risk assessment and mitigation strategies have been implemented by recognized GBVH experts.
ESR4: Health, safety and security	<i>Community Health and Safety:</i> Where turbines are sited in close proximity to people there maybe a number of nuisance and public safety issues associated with, for example, shadow flicker and blade glint, noise and ice thrown from blades.	- Turbines will be / have been designed and sited to avoid impacts on local residences, schools, hospitals, businesses and taking into account the safety of those in proximity to turbines. - Generally wind turbines should be over 700 m from the nearest residential area.	- Any affected local communities have been consulted on the location of turbines. - Develop and implement plans and procedures to protect public health, safety and security eg. Traffic management plan, noise, emergency plans and measures to prevent unauthorised access during construction (gates, fencing and signage). - Turbines are sited at sufficient distance from sensitive receptors to avoid any noise or visual impacts. - If turbines must be located close to sensitive receptors: - Turbines meet national requirements and international good practice for acoustic design. - Turbines have been designed and are orientated to avoid shadow flicker. - Turbines have been painted with a non-reflective coating.
ESR5: Land acquisition, restrictions on land use	The sub-project/sub-investment (the plant or its grid connection) may result in	The developer / sponsor will identify if land acquisition and/or restrictions	An assessment of the resettlement implications of the sub-project/sub-

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and involuntary resettlement	physical displacement (relocation or loss of shelter) and/or economic displacement (loss of assets or resources, and/or loss of access to assets or resources that leads to loss of income sources or means of livelihood) as a result of Sub-project/sub-investment-related land acquisition and/or restrictions on land use.	on land use for the sub-project/sub-investment, its components or any associated facilities¹ will result in physical displacement, economic displacement or loss of access to assets or resources. - If the sub-project/sub-investment will result in will result in physical or economic displacement, a Resettlement Action Plan (RAP) and/or compensation plan is required. Where applicable, the sub-project/sub-investment applies a “mitigation hierarchy” as required by the EBRD ESP, as follows: - Avoid displacement and, where this is not possible, implement additional measures to minimise, mitigate and, as a last resort, compensate for potential residual adverse impacts - Forced evictions are prohibited, in line with international law - Unavoidable residual displacement impacts have to be mitigated by (i) timely compensation at full replacement cost and (ii) ensuring meaningful consultation in	investment is undertaken early in the sub-project/sub-investment preparation stage (covering the plant and its grid connection). - An alternatives analysis has been conducted to identify alternative sites and transmission routings. - Where applicable, a Resettlement Action Plan and associated processes are developed in a timely manner for sub-project/sub-investment implementation and operation. - Monitoring is undertaken of implementation of the resettlement plans, and to verify that commitments made to resettles and host communities have been delivered and are effective, and to identify any ongoing or emerging issues.

¹ Facilities and sub-project/sub-investments developed by separate legal entities whose viability and existence are determined by or depend exclusively on the sub-project/sub-investment and are essential for the successful operation of the sub-project/sub-investment. This may include e.g. powerlines to connect the sub-project/sub-investment to the grid where these are not part of the sub-project/sub-investment.

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		Livelihoods have to be improved or, at a minimum, restored.	
ESR6: Biodiversity conservation and sustainable management of living natural resources	<i>Landscape and Visual Impacts:</i> Landscape and visual impacts are among the most far-reaching effects of wind farms and are generally of greatest concern to the public. Appropriate baseline data needs to be provided to allow for an assessment of flora and fauna. This assessment should include use of vantage points to assess flyways and potential impacts on wildlife.	- Turbines do not create significant changes in the landscape fabric, character and quality as a result of development. - Turbines and any ancillary structures are constructed so as to minimise visual impacts. - Turbines do not significantly alter the appearance of the landscapes (where the turbine can be seen) and negatively affect people, or people's use of that landscape.	- The landscape itself has not been significantly altered or damaged through clearance, excavation or construction. - Features of the landscape such as trees or hedgerows have not been removed in such numbers as to significantly change the nature of the landscape. - Public access to surrounding areas is not hindered by the turbines. - If bats are detected in area put in cut in speeds of 6/ms - Use the EBRD/IFC/KfW guidance on post construction monitoring to monitor for carcasses after construction of the wind farm² - The visual impact of turbines has been considered from all relevant viewing angles when considering location. - The number of ancillary structures which have a visual impact has been minimised. - Public consultations have been designed to take into account the people affected by the landscape impacts of the wind farm.
ESR6: Biodiversity conservation and sustainable	<i>Designated Areas:</i> Designated areas (e.g. a national park, IBA (Important Bird Areas), a NATURA 2000 site/Emerald site (both official and shadow lists) and "Ramsar"	Turbines do not have a negative impact on designated or potentially designed sensitive areas. In particular, with regards to flight paths	The developer / sponsor has undertaken research on the proposed location of the turbine(s) and either avoided siting within a designated location or received the

² www.ifc.org/en/insights-reports/2023/bird-bat-fatality-monitoring-onshore-wind-energy-facilities

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management of living natural resources	sites) are typically listed as such because they contain threatened, rare, or sensitive fauna and flora and the construction and operation of turbines in such areas may be detrimental to those species.	and potential migration routes for both birds and bats.	appropriate permissions from the authorities to do so. Turbines have been sited without causing unacceptable disturbance or damage. Where impacts cannot be avoided, the developer / sponsor has developed a mitigation strategy to limit the effect of the development national or international protected areas and a full ESIA has been conducted as per Category A (see ESR1)
ESR6: Biodiversity conservation and sustainable management of living natural resources	<i>Impacts on Fauna and Flora:</i> Operating wind turbines may result in collisions of birds and bats with rotor blades and / or with towers. Turbines may also alter the habitat around the sub-project/sub-investment site so changing the type and number of perching sites or the type and quantity of prey available to certain species. Likewise, the siting of turbines may have an impact on other species particular when considering those species of conservation value, located outside of designated areas. Develop mitigation measures to address biodiversity risks and impacts.	- Turbines will be / are sited, designed and configured to minimise impacts on migrating and / or nesting and feeding birds and bats. - Turbines will be / are sited, designed and configured to minimise impacts on other fauna and flora, notably any species of conservation value.	- A baseline study, of appropriate nature, has been undertaken with sufficient ornithological data to cover both migratory and breeding seasons. - Site selection will take / has taken account of known migration pathways or areas where birds and bats are highly concentrated. - Site selection will take / has taken account of any other fauna and flora located on site particularly any species of conservation value. - Turbines will be / have been configured to avoid potential avian mortality. - Use cut in speeds (6 m/s) if a risk to bats has been identified. - Develop shut down on demand protocols and measures, inclusive of use AI camera systems to shut down turbines as necessary. - Site will be / has been designed to avoid creating attractions for feeding or nesting

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			birds e.g. integration of storm water management measures to avoid creation of small ponds which might attract birds. The developer / sponsor to implement a monitoring program for bird and bats (loss of habitat, mortality, migration and behaviour) for at least 3 years.
ESR6: Biodiversity conservation and sustainable management of living natural resources	<i>Auxiliary Facilities:</i> Auxiliary facilities such as roadways to access turbines, and equipment for the transmission of electricity can, both during the construction and operational phases, create impacts on fauna and flora and people.	- Access roads, the site(s) and facilities for distribution of electricity are designed, constructed and operated so as to avoid, and where this is not possible mitigate, adverse environmental impacts. - Potential biodiversity risks of OHV power lines that connect the plant to the substation must be assessed. This assessment should inform how identified risks are mitigated.	- Auxiliary facilities have undergone appropriate impact assessment and any significant environmental or community impacts have been identified. - Any such impacts have been taken into account during siting decisions to preferably avoid, or where this is not possible, mitigate those impacts. Grid connections must be undergrounded or rerouted to avoid the impacts to the extent possible, and bird flight diverters must be installed to mitigate residual impacts. - Evidence of public consultations for the associated infrastructure.
ESR6: Biodiversity conservation and sustainable management of living natural resources	<i>Supply chain:</i> Mining of materials needed for wind turbines (such as neodymium for permanent magnets in wind turbines) can have significant biodiversity impacts where these minerals are mined in sensitive areas. Intensification of balsa logging – where balsa is used in blade construction – is also associated with deforestation.	- Developer / sponsor requires Tier 1 supplier (turbine vendor) to indicate country-level sources of most relevant raw materials to verify country of origin - Developer / sponsor requires Tier 1 supplier (turbine vendor) to specify if turbine components are fully traceable or not - Developer / sponsor requires Tier 1 suppliers to implement a Code of	- Developer / sponsor provides all requisite documentation for FI review; FI provides sub-project/sub-investment supply chain documentation for EBRD review. - Developer / sponsor has adequately detailed supply chain mapping and overview of component supply chain traceability - Code of Conduct is adopted by Tier 1 suppliers, with requirement to cascade to sub-suppliers

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		Conduct including commitment to zero deforestation	
ESR8: Cultural heritage	Sub-project/sub-investment construction may cause damage or disturbance to irreplaceable sites (areas of archaeological or historic interest to local communities), features, or practices of tangible or intangible cultural heritage value.	- The sub-project/sub-investment must avoid impacts to cultural heritage assets to the greatest extent possible. - The sub-project/sub-investment complies with applicable national laws on cultural heritage, antiquities, planning and building permits, conservation areas, protected areas, and other laws and regulations governing the built heritage. - The developer / sponsor has identified any potential tangible and intangible heritage that may be affected by the proposed development in accordance with national legislation and international treaties and obtained clearance for the Sub-project/sub-investment from the relevant authority. - The developer / sponsor has relied on work (e.g. archaeological surveys as appropriate) conducted by qualified and experienced specialists to identify and assess heritage that may be affected.	- The sub-project/sub-investment avoids impacts to cultural heritage assets wherever possible. - Where impacts cannot be avoided, the developer / sponsor has developed a mitigation strategy, including a chance finds procedure, to limit the effect of the development on heritage. - All site-specific cultural studies and mitigation strategies have been implemented by recognized archaeologists or cultural historians in accordance with international standards.
ESR10: Stakeholder engagement	Identification of and engagement with stakeholders is an integral part of a sub-project/sub-investment's preparation, environmental and social assessment and	The sub-project/sub-investment has a systematic approach to stakeholder engagement that will help the developer / sponsor build and	The affected community has been identified, notified and consulted prior to the development of the facility

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	management. The scope and depth of the required stakeholder engagement and information disclosure is proportionate to the sub-project/sub-investment's environmental and social risks and impacts. Stakeholder engagement activities should be used to inform the contextual risks associated with the sub-project/sub-investment and the sub-project's/sub-investment's social licence to operate.	maintain a constructive relationship with their stakeholders • The sub-project/sub-investment provides the means for effective and inclusive engagement with Sub-project/sub-investment stakeholders throughout the Sub-project/sub-investment cycle • The sub-project/sub-investment ensures that appropriate E&S information is disclosed and meaningful consultation is held with the sub-project/sub-investment's stakeholders and where appropriate, and that feedback provided through the consultation is taken into consideration • The sub-project/sub-investment ensures that grievances from stakeholders are responded to and managed appropriately. • The sub-project/sub-investment develops a Non-Technical Summary (NTS) outlining project impacts and monitoring to allow for meaningful stakeholder engagement, communication and provision of information on project assessment and mitigation measures.	• For higher-risk projects involving large-scale land acquisition, or with significant community concerns or complex issues, a stakeholder engagement and community liaison function is established by the developer / sponsor, with dedicated personnel. • Information on monitoring results should be provided to local stakeholders if necessary, or as part of the annual sustainability reporting. • The developer publishes an NTS for the sub-project/sub-investment and makes it available to the local community. • The sub-project/sub-investment has implemented a Stakeholder Engagement Plan (SEP) or equivalent documented process proportionate to the nature and scale or the risks, impacts and development stage of the sub-project/sub-investment ensuring data protection and confidentiality, non-reprisal, establishing processes for information disclosure, meaningful consultation, feedback on consultation and documentation and access to the Sub-project/sub-investment grievance mechanism. • An effective grievance mechanism has been developed and implemented by the developer / sponsor as early as possible in the sub-project/sub-investment cycle, to cover both the construction and operational phases of the Sub-project/sub-

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			investment. The mechanism is publicised and disclosed in a format and language that is readily understandable to the affected stakeholders. Monitoring of grievances is undertaken on a periodic basis against clear indicators. Contractors' roles and responsibilities for receiving grievances, supporting the investigation and resolution of grievances and abiding by the sub-project/sub-investment grievance mechanism are clearly set out in the grievance procedure and stipulated in the contractor's contract.