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07/07/2023

Environmental and Social Data Sheet

Overview	
Project Name:	COMO WATER INVESTMENTS
Project Number:	2021 0698
Country:	Italy
Project Description:	Investments in water and wastewater infrastructure in the Province of Como (Lombardy Region) during the period 2023 - 2026.
EIA required:	no
Project included in Carbon	Footprint Exercise ¹ : no

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

Environmental and Social Assessment

Environmental Assessment

The proposed Project concerns the 2023-2026 water and wastewater investment programme Como Acqua S.p.A., a public owned utility providing Integrated Water Services ("IWS") to ca. 500,000 persons in the service area (referred to ATO), covering 147 municipalities in the provinces of Como in the Lombardy region. Como Acqua is managing the services under a concession agreement that will last until end 2045.

The activities of Como Acqua are under the supervision of the conference of mayors (Autorità d'Ambito dell'ATO 2) and the national economic regulator ("ARERA"). In terms of environmental regulation, the Regional Agency for Environmental Protection and Prevention of Lombardia (ARPA Lombardia) is mainly responsible for monitoring the quality of water bodies. The Health Authority is responsible for monitoring compliance with the drinking water quality standards.

The works to be funded fall within the concession's contractual investment programme (Piano d'Ambito) and includes a wide variety of investments: upgrades and extensions of water abstraction and treatment facilities, water distribution networks, sewage collection networks and sewage treatment facilities. An important feature in this investment plan is the mapping activities due to the recent mergers and the necessity of having an accurate information database of the managed assets and their operating status. The Piano d'Ambito has been approved by EGA, the regional authority, and by ARERA at national level.

The Promoter concludes that the Project will deliver substantial environmental quality improvements in the form of a higher ecological quality of surface and ground water resources and a more rational use of water resources that outweigh the negative impacts, which occur mainly during construction (e.g. noise, dust, traffic). The Project will ensure compliance with regional environmental law, and the Urban Wastewater Treatment Directive 91/271/EEC in the Promoter's service area.

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.



As of now, the Promoter has informed that there is no scheme that falls under Annex I or Annex II of the Environmental Impact Assessment ("EIA") Directive 2014/52/EU amending the EIA Directive 2011/92/EU. If a future scheme were to fall under Annex II, the decision whether an EIA is required is left to the Competent Authority (the Region of Lazio), on the basis of the criteria defined in Annex III of the EIA Directive.

For the time being, three schemes might need an appropriate assessment as they impact some Natura 2000 sites. The assessments or their respective links will be published on EIB website when approved by the competent authorities.

Finally, the Project is "Paris aligned" as it is coherent with a low carbon and resilience objective and will contribute to Climate Adaptation and Mitigation by supporting investments that increase resilience to climate related risks and reduced GHG emissions.

EIB Paris Alignment for Counterparties (PATH) Framework

The counterparty Como Acqua is in scope and screened out of the PATH framework because it does not operate in high emitting sectors and its vulnerability to physical risks is not High.

Social Assessment

By increasing the quality and reliability of water and wastewater collection and treatment services, the Promoter concludes that the Project is expected to bring substantial health advantages and environmental quality improvements to the affected population, thereby increasing the quality of life in the Project area. Social negative impacts would be only temporary (e.g. occupation of public and private space, safety hazards during construction, traffic, noise) and will be addressed as part of the planning for the implementation of each scheme.

Public Consultation and Stakeholder Engagement

The Promoter will be requested to ensure compliance with national and European environmental legislation, notably to facilitate public access to environmental information and guarantee public consultation during the environmental decision making process, where relevant, in accordance with the Aarhus Convention.

Other Environmental and Social Aspects

During the Project's due diligence, the Promoter has demonstrated sound practices with respect to environmental, health and safety management. In addition to procedures to meet regulatory requirements, the Promoter has a comprehensive environmental management system which is applied to new Projects and monitors ongoing operations. The Promoter has the following certifications: ISO 9001 (Quality Certification), ISO 14001 (Environmental Certification), OHSAS 18001 (Occupational Health and Safety), and ISO 50001 (Energy Management certification).

Conclusions and Recommendations

The Project is driven by the requirement to ensure compliance with relevant EU environmental directives and it will also contribute towards improved climate resilience and emissions reductions. All schemes under the Project will be subject to the Promoter's compliance with the following requirements:

1. The Promoter undertakes not to allocate Bank funds to programme components that require a full EIA until the EIA and/or the necessary nature assessment have been finalised and approved by the relevant competent authority. Once any EIA is available,





the Promoter will provide the Bank with an electronic copy of the EIA, for publication on the EIB website.

- 2. The Promoter shall not commit any EIB funds against any scheme that impacts nature conservation sites, without receiving from the relevant competent authorities the declaration under Art. 6(3) of the Habitats Directive that there are no significant effects and informing the Bank of such declaration having been obtained.
- 3. The Promoter undertakes to provide to the Bank, if requested, any decision and subsequent justification that screen out Project components from the requirement of a full EIA as well as the decisions issued by the competent authorities regarding the Habitats and Birds Directives.

Under these conditions, the operation is acceptable for EIB financing in environmental and social terms.