

EolMed – Gruissan, Floating Offshore Windfarm

Non-technical Summary – Human Rights Impact Analysis

Technical Note (TN)

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Non-technical Summary – Human Rights Impact Analysis

Through its activities, the Qair Group and Eolmed have been fully committed to ensuring the respect, and protection of Human rights across all aspects of its business and undertakings.

With a view towards ensuring compliance with the Equator Principles IV a review of the human rights risks was undertaken for the project, a summary table of the risks is found below.

France’s strong engagement on the matters of Human rights, coupled with local laws and controls it is argued that the local context poses little risk to the human rights of employees and community stakeholders. Further, the absence of vulnerable groups in the proximity of the site lessens the possibility of significant human rights breaches.

It should be noted that the European, national, and regional legal safeguards provided by the context of the project being built, installed, and operated in the Aude region in the south of France result in the severity of impacts posed by, and resulting from the Eolmed project are minimal.

Furthermore, Qair Groupe, Eolmed, and its key contractors’ engagements, policies and processes regarding supply chain human rights risks further limit the likelihood of negative impact with regards to stakeholders’ human rights.

As a result, it can be concluded that the initial scan the Project confirms that it is of a lower risk and the identified human rights risk can be managed through existing internal controls and that no further consultation or in-depth review is required.

Key Factors

Rights category	Human Rights issue	Impact Severity on Eolmed Project
Labour	Child Labour	N/A
	Collective bargaining and Freedom of association	Low
	Modern Slavery (Forced Labour/Human Trafficking)	Low
	Grievance Mechanism and Remedy	Medium
	Job Security/Right to Work	Low
	Non-discrimination	Low
	Occupational health and safety	Medium
	Wages (pay equity, standard of living)	Low
	Working Hours	Low
Civil and Political	Freedom of expression	Low
	Right to life and security of person	N/A
	Privacy	Low
Economic, Social, and Cultural	Right to education	N/A
	Right to health	Low
	Right to participate in the cultural life of the community	N/A
	Right to Water	N/A
	Social Insurance	Low

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Group Rights/ 'Heightened Risk of Vulnerability'	Children's Rights	N/A
	Disability Rights	Low
	Indigenous Peoples	N/A
	Migrants Rights	N/A
	Women's Rights	Low

Key Controls

Through various phases of the development of the Project consultation was undertaken with the external stakeholders and as a result;

- A scientific consultation committee was put in to place to provide regular monitoring of the environmental impact of the project,
- Regular engagement with local fishermen has been undertaken and is scheduled to liaise with the most significantly affected portion of the local population.

Given the context of Human Rights in France and the limited scope of the Eolmed project the initial scan identified no significant impact on the Human Rights of stakeholders to the Eolmed Project.

Only two areas of medium impact severity were identified and these are discussed below:

1. Labour Rights – Grievance Mechanism and Remedy

It is proposed that Eolmed proceed with the implementation of its grievance mechanism which, once established will in the due course of the projects development, appropriately monitor any residual impact on the human rights of the project's stakeholders and employees and allow a mechanism of communication and monitoring for any eventual issue requiring remedy.

1.1 Remedy - Economic Impact and Compensation to Local Fishermen

It bears mentioning that as part of the impact studies undertaken in the preliminary phases of the development of the project there was an economic impact identified from the reduction in available exploitable waters as a result of the creation of a maritime exclusion zone for the project. There is a program of compensation (both financial and other) which has been put in place as a result and which is being monitored through the environmental management plan.

2. Labour Rights – Occupational Health and Safety

While the labour right of Occupational Health and Safety was identified as having a potential medium impact severity, the controls in place both through local labour laws; project design, and the OHS systems put in place both by Eolmed; and its key contractors, it is believed to be appropriately managed through existing controls and no further mitigation measures are proposed.