

Critical Habitat Assessment (CHA) Report

Dama Solar PV Plant Project, Romania

Prepared by TLCommunications



Communications

CONSULTING SERVICES

Date 12 March 2026

Report reference TLC-01-2026-RESOLV ENERGY-DAMA-CHA

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Version V0.1 Draft

DOCUMENT INFORMATION

DOCUMENT TITLE	Critical Habitat Assessment (CHA) Report
PROJECT NAME	Dama Solar PV Plant Project, Romania
DOCUMENT REFERENCE	TLC-01-2026-RESOLV ENERGY-DAMA-CHA
DATE	12 March 2026
LATEST VERSION	V0.1 Draft
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CLIENT	West Power Investments SRL

ISSUE AND VERSION RECORD				
Version Number	Revision	Date	Author	Comments
0.1 draft	-	12 March 2026	Adam Teixeira Leite	Draft report for Client/Lender review and comment

SIGNATURE

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The reporting and assessment have been undertaken with due care and the utmost professionalism and constitute the author's own work. Where third-party data or information has been used, this has been referenced appropriately.

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EXECUTIVE SUMMARY

An updated Critical Habitat Assessment (CHA) was undertaken for the planned Dama Solar Photovoltaic (PV) Plant Project in Romania, to inform the Environmental and Social Impact Assessment (ESIA).

The revised CHA and new report (this document) supersedes the previous version developed by Environmental Resources Management (ERM) in 2024, and has been specifically revisited to align with the latest versions of the European Bank for Reconstruction and Development (EBRD) Environmental and Social Requirements (ESR) and updated Guidance Note regarding ESR 6 on biodiversity and ecosystems released in 2024 and 2025, respectively, and to address comments/recommendations arising from the Environmental and Social Due Diligence (ESDD) completed for the Environmental and Social Impact Assessment (ESIA) in January 2026. This essentially has necessitated a revision to the assessment and report.

The Project is seeking finance based on international project finance that includes several prospective lenders represented by the following International Financial Institutions (IFIs):

- The International Finance Corporation (IFC); and
- The European Bank for Reconstruction and Development (EBRD).

The CHA therefore considered the Critical Habitat (CH) qualifying criteria and thresholds contained in the Project's 'Applicable E&S standards' concerning biodiversity and ecosystems which include IFC PS 6 and EBRD ESR 6, as well as those relevant to defining Priority Biodiversity Features (PBF) as per EBRD ESR 6 specifically.

The key findings of the CHA are as follows:

- The Project qualifies as CH in terms only of a single physical habitat type, that being **Pannonic salt steppes and salt marshes (code 1530*)** which qualifies as CH given its regionally EN threat status and most importantly, listing as a 'priority habitat' in Annex I of the EU Habitats Directive.
- None of the species of flora and fauna considered in the assessment were found to meet the qualifying criteria and thresholds for CH.
- Numerous species of flora and fauna were identified as PBF for the Project, qualifying under multiple criteria including those related to priority species (i.e. threatened/protected species at global/regional/national levels and migratory species of birds and bats typically). A combined total of 137 species qualify as PBF, including):
 - 110 bird species
 - 4 amphibians
 - 1 reptile
 - 7 mammals
 - 5 invertebrates
 - 10 plants

For the CH qualifying physical habitat type, Pannonic salt steppes and salt marshes, the Project will need to align with the Project applicable standards (EBRD ESR6 and IFC PS6) pertaining to the management and mitigation of impacts on CH. Most important will be the avoidance (and then minimization of impacts) as far as possible and requirement to meet Net Gain (NG) of biodiversity for CH values. The strategy and approach with key actions has already been considered in a Biodiversity Action Plan (BAP) developed for the Project in 2025. A focus has already been on avoiding direct impacts to CH through revisions to the development layout plan to exclude development of solar arrays in areas that are CH.

For the PBF values (species of fauna and flora), a focus should be on avoiding and minimizing impacts where possible, in accordance with the EBRD ESR6 requirements, and a key component of this will be meeting at least No Net Loss (NNL) of biodiversity, preferably NG where possible. This has also been considered in the BAP; however, as the revised CHA (this report) has identified numerous additional species that qualify as PBF (compared to the original CHA report from 2024), it is recommended that the BAP be reviewed and updated to include these additional species and the strategy, approach, actions and interventions refined or revised as necessary to ensure NNL (or NG) can also be achieved practically for these additional species.

The findings of this updated CHA will be used to inform the necessary updates to the Biodiversity Impact Assessment (BIA) for the Project.

TABLE OF CONTENTS

1.	Introduction	10
1.1	Background	10
1.2	Purpose	12
1.3	Key Definitions	13
2.	Approach and Methods	14
2.1	Step 1: Study Area for the CHA	14
2.2	Step 2: Initial Screening of Species and Habitats	16
2.3	Step 3: Defining the EAAA	18
2.4	Step 4: Applying CH/PBF Criteria	18
2.4.1	EBRD Criteria & Thresholds	19
2.4.2	IFC Criteria & Thresholds	21
2.5	Key Data Sources	22
3.	Results	23
3.1	Initial Screening of Species and Habitats (Step 2)	23
3.2	Candidate Habitats	23
3.3	Candidate Species	27
3.4	Define EAAA (Step 3).....	29
3.5	Evaluation of CH/PBF against Criteria/Thresholds (Step 4).....	30
3.6	Threatened Ecosystems and Habitats.....	30
3.7	Priority Species: Threatened Species	32
3.8	Priority Species: Endemic and Restricted-range Species.....	37
3.9	Priority Species: Migratory and Congregatory Species.....	37
3.10	Key Evolutionary Processes.....	39
4.	Summary of the CHA	40
4.1	CH	40
4.2	PBF	40
5.	Implications for the Project	44
5.1	Requirements for CH	44
5.2	Requirements for PBF	45
6.	References.....	46
7.	Annexures	47
7.1	CH Species Screening Table.....	48
7.2	PBF Species Screening Table.....	51

7.3	Annexure C: Requirements of IFC and EBRD for CH and PBF	59
7.3.1	EBRD Requirements for CH	59
7.3.2	EBRD Requirements for PBF	59
7.3.3	IFC Requirements for CH.....	59
8.	Appendices	61
8.1	Appendix A: IBAT PS6 Report	61
8.2	Appendix B: Supplementary Field Verification Report for Critical Habitat (1530* Pannonic salt steppes and salt marshes).....	61
8.3	Appendix C: Species Screening Database	61

TABLES

Table 1	Step-wise approach to the CHA	14
Table 2	Grouping of CH Criteria	19
Table 3	EBRD Criteria and thresholds for CH and PBF	19
Table 4	IFC Criteria and thresholds for CH.....	21
Table 5	Candidate Habitat Types Screening Table	25
Table 6	Candidate Species Screening Table.....	27
Table 7	Candidate Species List	27
Table 8	CH analysis for Globally Threatened species.....	33
Table 9	CH analysis for Regionally CR/EN species	34
Table 10	CH analysis for Nationally CR/EN species	36
Table 11	CH analysis for Globally Threatened Migratory/Congregatory species	38
Table 12	List of PBF Species for the Project.....	41
Table 13	CH Species Screening Table.....	48
Table 14	PBF Species Screening Table.....	51

FIGURES

Figure 1	Project Locality Map.....	10
Figure 2	Map showing the Project in relation to Natura 2000 protected areas and the outputs of the global critical habitat screening layer	11
Figure 3	Map showing The Study Area for the CHA	16
Figure 4	Diagram showing the step-wise species screening process used in the CHA	17
Figure 5	Land Cover/Habitat Map for the CHA Study Area.....	24
Figure 6	Map showing the EAAA defined for the Project	30

ACRONYMS / ABBREVIATIONS

Acronym/Abbrev.	Full Term (Description)
Aol	Area of Influence
BAP	Biodiversity Action Plan
BMP	Biodiversity Management Plan
CH	Critical Habitat
CHA	Critical Habitat Assessment
CLC	Corine Land Cover
CR	Critical Endangered
DD	Data Deficient
E&S	Environmental and Social
EAAA	Ecologically Appropriate Area of Analysis
EBRD	European Bank for Reconstruction and Development
EEA	European Environmental Agency
EN	Endangered
EoO	Extent of Occurrence
ERM	Environmental Resources Management
ESIA	Environmental and Social Impact Assessment
ESDD	Environmental and Social Due Diligence
ESR	Environmental and Social Requirement
EU	European Union
EUNIS	European Nature Information System
GBIF	Global Biodiversity Information Facility
GN	Guidance Note
IBA	Important Bird and Biodiversity Area
IBAT	Integrated Biodiversity Assessment Tool
IFC	International Finance Corporation
IFI	International Finance Institution
IUCN	International Union for Conservation of Nature
KBA	Key Biodiversity Area
kV	Kilo Volt
LC	Least Concern
MW	Mega Watt

Acronym/Abbrev.	Full Term (Description)
NG	Net Gain
NNL	No Net Loss
NT	Near Threatened
PA	Protected Area
PBF	Priority Biodiversity Feature
PS	Performance Standard
PV	Photovoltaic
RDL	Red Data List
SPA	Special Protection Area
SCI	Site of Community Importance
VU	Vulnerable

KEY TERMS

Critical habitat: Critical habitat is typically defined as the most sensitive biodiversity features and the definition varies to a degree depending on that of the relevant International Financial Institution (IFI). Typically though, this relates to habitat important for supporting globally/regionally threatened species, endemic and/or restricted-range species, migratory and/or congregatory species, threatened or unique ecosystems/habitats and ecological / evolutionary processes. An example of the definition of the IFC is as follows: *(i) habitat of significant importance to Critically Endangered and/or Endangered species; (ii) habitat of significant importance to endemic and/or restricted-range species; (iii) habitat supporting globally significant concentrations of migratory species and/or congregatory species; (iv) highly threatened and/or unique ecosystems; and/or (v) areas associated with key evolutionary processes* (IFC, 2012).

Priority biodiversity features: This concept replaces the previous definition of natural habitat used previously by EBRD and adopts a criterion-based approach already used for definition of critical habitat. Priority in all EBRD definitions combines consideration of irreplaceability and vulnerability. Priority biodiversity features (PBF) have a high, but not the highest, degree of irreplaceability and/or vulnerability. Although a level below critical habitat in sensitivity, they still require careful consideration during project assessment and impact mitigation (EBRD ESR6, 2024).

Net Gain (NG): Net gains are additional conservation outcomes that can be achieved for the biodiversity values for which critical habitat was designated. Net gains may be achieved through the development of a biodiversity offset and/or, in instances where the client could meet the lenders requirements without a biodiversity offset, the client should achieve NG through the implementation of programs that could be implemented in situ (on-the-ground) to enhance habitat and protect and conserve biodiversity (IFC, 2012).

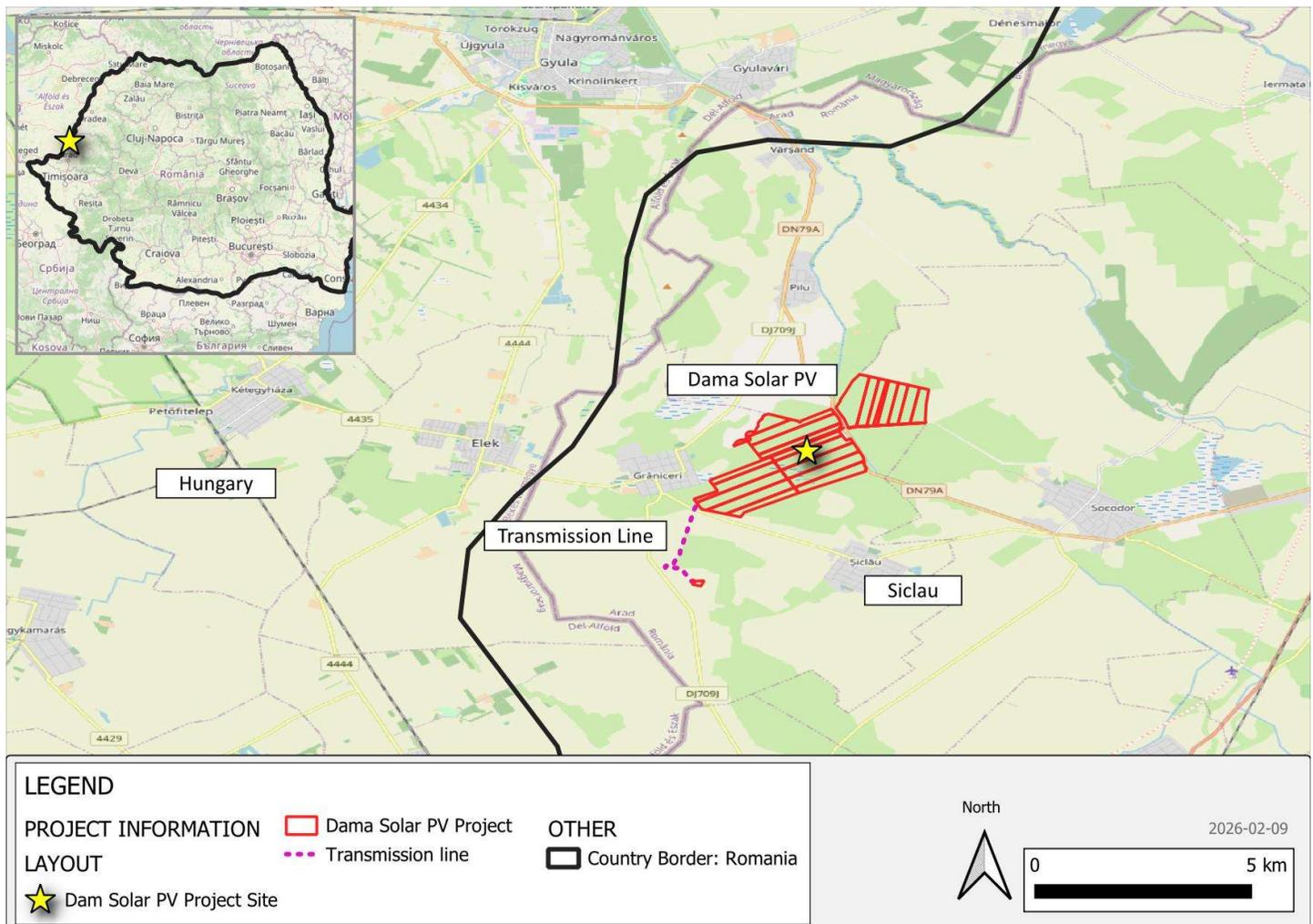
No Net Loss (NNL): No net loss is defined as the point at which project-related biodiversity losses or impacts on biodiversity are balanced by the gains resulting from measures taken to avoid and minimize these impacts, to undertake on-site restoration and finally to offset significant residual impacts, if any, on an appropriate geographic scale (e.g., local, landscape-level, national, regional) (IFC PS6, 2012). This is an approach and goal for a development project, policy, plan or activity in which the impacts on biodiversity it causes are balanced by measures taken to avoid and minimize the impacts, to restore affected areas and finally to offset the residual impacts, so that no loss remains.

1. Introduction

1.1 Background

The ‘Dama Solar Photovoltaic (PV) Plant Project is a 1,065 Megawatt (MW) solar PV power plant that is being planned in the western-most part of Romania near the border with Hungary (referred to hereafter as ‘the Project’). A locality map showing the solar PV project area (solar panel arrays and underground transmission line to substation) is provided below in **Figure 1**. Detailed Project information can be found in the relevant section of the Environmental and Social Impact Assessment (ESIA) and Biodiversity Impact Assessment (BIA) report and has not been duplicated here

FIGURE 1 PROJECT LOCALITY MAP



Information/data sources: TLCommunications, using Client-provided data and public ‘creative commons’ / ‘free-to-use’ GIS datasets, background imagery: Google Earth™ StreetMap™

The Project is seeking finance based on international project finance that includes several prospective lenders represented by the following International Financial Institutions (IFIs):

- The International Finance Corporation (IFC); and
- The European Bank for Reconstruction and Development (EBRD).

The Environmental and Social (E&S) Policy and Standards/Requirements of the EBRD and IFC have been considered as the ‘applicable standards’ for the Project. *For further information regarding applicable E&S standards, the reader is referred to the relevant chapter of the main ESIA and BIA reports.* The CHA has considered the Critical Habitat (CH) qualifying criteria and thresholds of EBRD ESR 6 and IFC PS 6 and (contained in the respective Guidance Notes), as well as those relevant to identifying Priority Biodiversity Feature (PBF) values (note that PBF is exclusive to EBRD ESR 6).

Special Note on the updated CHA and new report issued:

An updated CHA was undertaken for the Project and a new report issued (this document) that now supersedes the previous version developed by Environmental Resources Management (ERM) in 2024, and which has been specifically revisited for the following reasons:

1. In the time between the last iteration of the CHA in 2024, the EBRD released a revised set of ESR as well as an update to Guidance Note regarding ESR 6, which importantly contains revised criteria and thresholds for identifying Critical Habitat (CH) and Priority Biodiversity Features (PBF) that could possibly affect species qualification as CH/PBF and result in differences to the initial assessment;
2. The threat status of species according to the IUCN may have changed between the period when the CHA commenced in 2023 and 2026 (present day) and this has necessitated a review and updates where necessary to the species considered as part of the assessment (indeed numerous species global/EU threat status has changed upon review), which may result in changes to the assessment outcomes in terms of CH/PBF qualification; and
3. To address any other comments/recommendations arising from the Environmental and Social Due Diligence (ESDD) for the ESIA which
4. It was completed by external/independent consultants from WSP in January 2026.

According to the applicable standards and related Guidance Notes of the EBRD and IFC, Clients must assess whether their Project area includes Critical Habitat (CH) and/or Priority Biodiversity Features (PBF) and whether impacts to these features are anticipated, in order to inform mitigation planning in the ESIA stage in accordance with the specific requirements to management CH/PBF according to the respective IFI. This is particularly relevant, and in fact a mandatory requirement of both IFC and EBRD, where Projects are located within legally Protected Areas (PAs). The Project overlaps with two particular PAs forming part of the Natura 2000 network of conserved sites in Europe (see map in **Error! Not a valid bookmark self-reference.**):

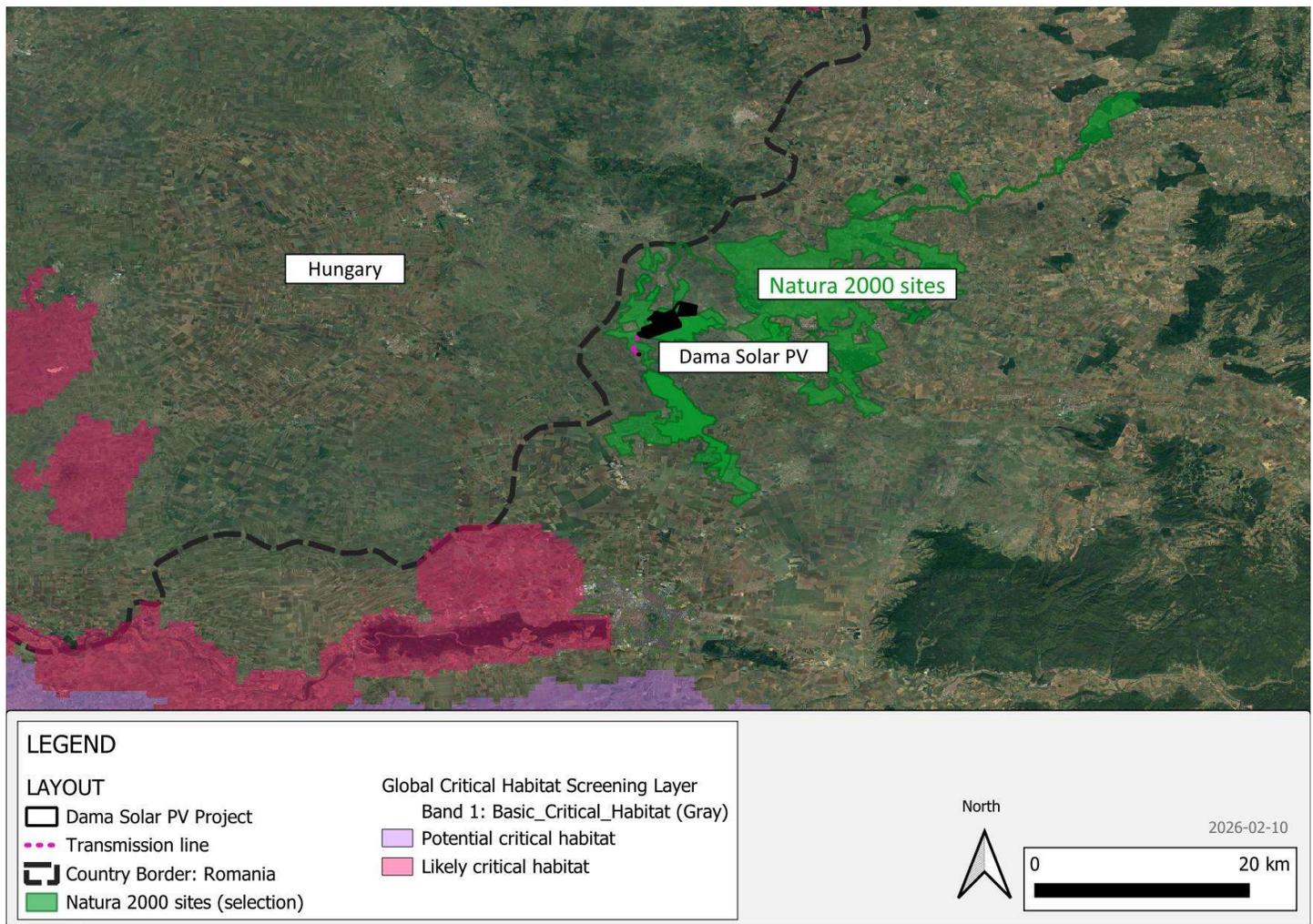
- Nădab - Socodor – Vârșad [code: ROSCI0231] - Site of Community Importance (‘SCI’); and
- Câmpia Crișului Alb și Crișului Negru [code: ROSPA0015] - Special Protection Area (‘SPA’) [also incorporates a Key Biodiversity Area or ‘KBA’ and Important Bird and Biodiversity Area or ‘IBA’].

Also, the same map in **Error! Not a valid bookmark self-reference.** shows the outputs of the ‘Global Critical Habitat Screening Layer’ (UNEP-WCMC, 2025) and this shows the broad extent of ‘potential’ and ‘likely’ critical habitat modelled nearby (south

¹ “The composite ‘Critical Habitat layer’ draws on 20 global-scale datasets, of which 12 datasets support screening of Critical Habitat in the terrestrial realm and 15 datasets support screening in the marine realm” (UNEP-WCMC, 2025). A raster layer attributes 1km² grid cells as ‘likely’ or ‘potential’ Critical Habitat, or unclassified based on a classification scheme reflecting biodiversity data layer alignment with IFC-PS6 Critical Habitat criteria/scenarios and inherent degree of certainty (in terms of presence on the ground).

of the Project). It is, however, acknowledged that this is a relatively coarse resolution data set and that further analysis at a more detailed Project-level is required still. Furthermore, the results of the preliminary assessment and report generated using the Integrated Biodiversity Assessment Tool (IBAT) (see report attached as **Appendix A**), suggests that the ‘Campia Crisurilor’ Key Biodiversity Area (KBA) (which is also an IBA: Important Bird and Biodiversity Area) that overlaps the Natura 2000 site (Câmpia Crişului Alb și Crişului), be assessed for critical habitat.

FIGURE 2 MAP SHOWING THE PROJECT IN RELATION TO NATURA 2000 PROTECTED AREAS AND THE OUTPUTS OF THE GLOBAL CRITICAL HABITAT SCREENING LAYER



Information/data sources: TLCommunications, using Client-provided data and public ‘creative commons’ / ‘free-to-use’ GIS datasets, Natura 2000 sites coverage (European Environmental Agency/EAA coverage dated 2024) and Global Critical Habitat Screening Layer V2.1 (UNEP-WCMC, 2025), background imagery: Google Earth™ Satellite™.

1.2 Purpose

This report presents the CHA (updated in February 2026 for the Project, which has been prepared in support of the Project’s alignment with the applicable international standards, which include:

- EBRD Environmental and Social Requirement 6 (ESR 6): *Biodiversity Conservation and Sustainable Management of Living Natural Resources* (EBRD, 2024);

- IFC Performance Standard 6 (PS 6): *Biodiversity Conservation and Sustainable Management of Living Natural Resources* (IFC, 2012).

The purpose of the CHA, aligned with EBRD GN on ESR6 (EBRD, 2025) is to determine whether there are any ecosystems, habitats or species occurring within the study area defined for the Project, according to a standard set of evaluation criteria and thresholds. This is essentially an effort to identify conservation priorities in the study area that could be potentially affected by the Project (in terms of CH and PBF, as arguably the most important/sensitive components of biodiversity and warranting conservation focus). The CHA aims to:

- Carry out an assessment of the potential for CH and PBF based on the Project biodiversity features in accordance with the latest (as of February 2026) applicable E&S standards/requirements of EBRD and IFC and relevant Guidance Notes (GN) that cover CH and PBF;
- Identify and classify CH and PBF values for the Project, where applicable;
- Present the implications of the CHA findings for the Project (including potential for impacts, management and mitigation requirements to inform the Biodiversity Impact Assessment or BIA forming part of the overall ESIA); and
- Identify the recommended next steps for the Project (as necessary).

1.3 Key Definitions

The respective IFIs (IFC and EBRD) define CH in their respective E&S policies / performance standards / performance requirements and related GN regarding biodiversity and ecosystems and there is some variation in the definition and in particular the criteria used to determine CH and PBF. These are presented below.

1.3.1 EBRD Definitions

According to EBRD ESR6, specifically para. 14, CH is defined as the most sensitive biodiversity features which comprise one of the following:

- (i) *highly threatened or unique ecosystems;*
- (ii) *habitats of significant importance to endangered or critically endangered species;*
- (iii) *habitats of significant importance to endemic or geographically restricted species;*
- (iv) *habitats supporting globally significant migratory or congregatory species;*
- (v) *areas associated with key evolutionary processes (EBRD, 2024).*

This is very similar to the IFC definition, however the EBRD criteria for defining CH differ (include reference to EU Habitat/Birds Directives for example, which IFC does not). *CH qualifying criteria are described in detail in Section 2.4.*

EBRD also exclusively define 'Priority Biodiversity Features' (PBF) which are a sub-set of biodiversity that is considered irreplaceable or vulnerable, but at a lower priority level than CH, which include: *(i) threatened habitats; (ii) vulnerable species; (iii) significant biodiversity features identified by a broad set of stakeholders or governments; and (iv) ecological structure and functions needed to maintain the viability (EBRD, 2024). PBF qualifying criteria are described in detail in Section 2.4*

1.3.2 IFC Definitions

According to IFC PS6, specifically para. 16, CH are a subset of modified or natural habitats and are areas with high biodiversity value that include:

- (i) *habitat of significant importance to Critically Endangered and/or Endangered species;*
- (ii) *habitat of significant importance to endemic and/or restricted-range species;*

- (iii) *habitat supporting globally significant concentrations of migratory species and/or congregatory species;*
- (iv) *highly threatened and/or unique ecosystems; and/or*
- (v) *areas associated with key evolutionary processes* (IFC, 2012).

CH qualifying criteria are described in detail in Section 2.4.

Note that the IFC does not consider or define PBF in terms of terminology used (this is an exclusive term used by the EBRD).

2. Approach and Methods

The CHA employs a comprehensive approach and methodological rigor to determine the presence or likelihood of there being CH and/or PBF and follows a structured step-wise approach and methodology. To inform the approach, the guidance provided in EBRD's latest Guidance Note on ESR 6 (EBRD, November 2025) was considered, which outlines the key steps for screening the Project's biodiversity values against the CH/PBF criteria. The screening process was further informed by additional guidance provided in GN69 to GN97 of the IFC Guidance Note (GN) 6: 'Biodiversity Conservation and Sustainable Management of Living Natural Resources' (2019). See **Table 1** below for the step-wise approach.

TABLE 1 STEP-WISE APPROACH TO THE CHA

Step 1: Define Study Area for CHA	Identify an appropriate study area for the CHA.
Step 2: Initial Screening for Candidate Species and Habitats	Conduct initial screening of ecosystems/habitats and species to ascertain occurrence/potential occurrence in the study area, outputting a list of 'candidate species/habitats' for further analysis.
Step 3: Define EAAA	Define appropriate Ecological Area of Analysis (EAAA) for the candidate species/habitats identified from step 2 above.
Step 4: Apply CH/PBF Criteria and Thresholds	Apply CH/PBF qualifying criteria and thresholds for candidate species/habitats and EAAA identified under steps 2 and 3 above.
Step 5: Identify Requirements for Managing CH/PBF	Where CH/PBF are confirmed present or likely present, EBRD ESR 6 and IFC PS6 management and mitigation requirements typically apply and the implications for the Project are then examined further in terms of overlaps with the direct/indirect impact area or 'Area of Influence' (AoI) defined for the Project for biodiversity.

Information/data sources: TLCommunications, informed by EBRD ESR6 and IFC PS6 (and applicable Guidance Notes).

2.1 Step 1: Study Area for the CHA

A broad study area for the CHA was initially considered for all species potentially occurring within a 50 km radius buffer zone of the Project (as well as 10 km and 1 km buffers used by IBAT), which is typically what the IBAT assessment and report outputs in a PS 6 report format, indicating species of conservation concern (i.e. threatened species, endemics, migratory species, etc.) that have known/modelled geographical distributional ranges that overlap with this buffer area according to the International Union for Conservation of Nature (IUCN) Red Data List (RDL) for threatened species (<https://www.iucnredlist.org>). This initial list of species was then subjected to further screening as part of Step 2 (below).

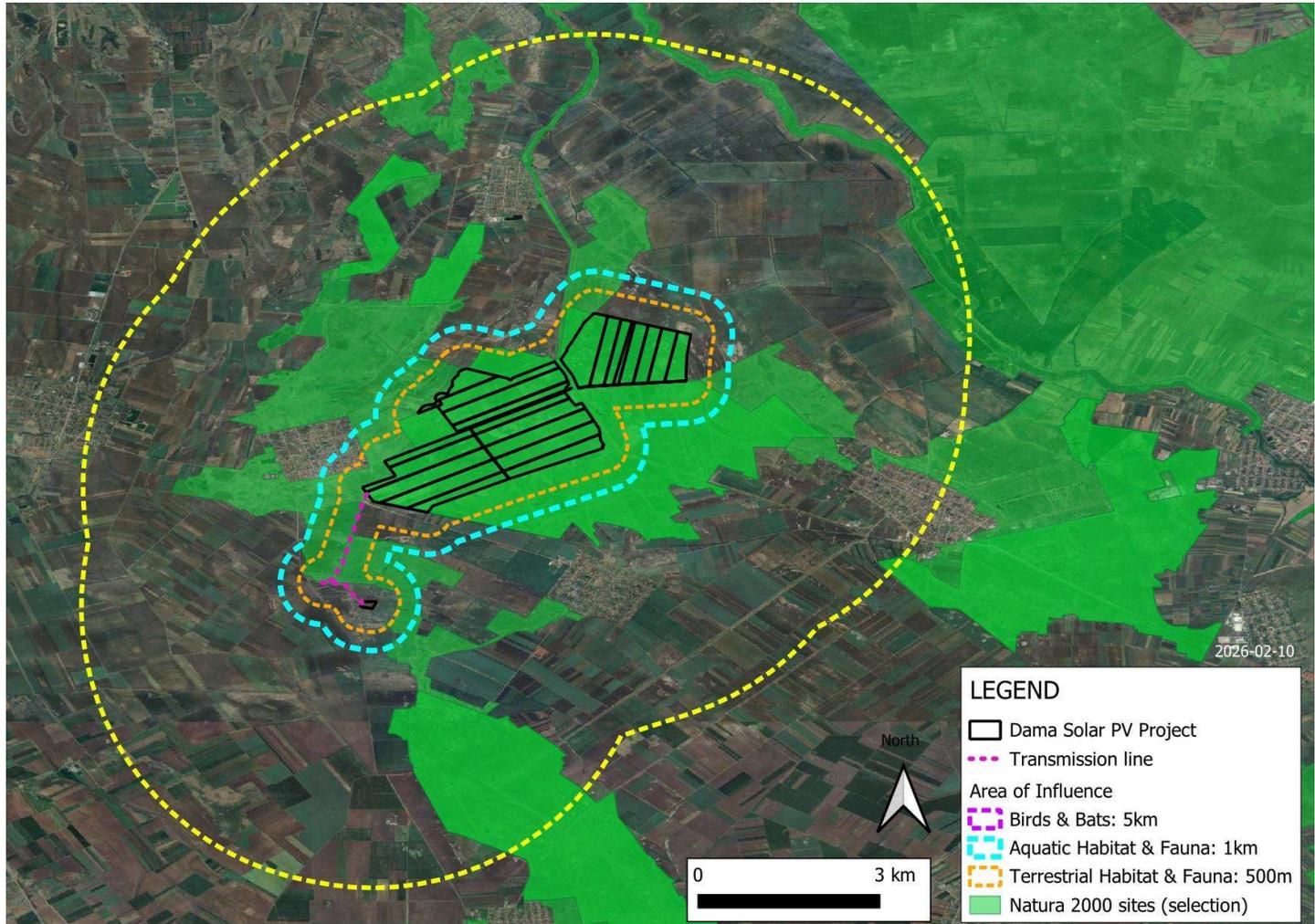
Using such a broad study area does not make practical sense for CHA, and therefore an attempt was made to define a more appropriate study area for species and habitats based on a review of information on the region's ecology and aligned with the direct and indirect Area of Influence (AoI) defined for biodiversity with reference to that described in the BIA report (avifauna, terrestrial species, terrestrial ecosystems/habitats/species, aquatic ecosystems/habitats/species) to provide an initial point of reference for identifying candidate species and habitats that could be impacted by the Project and which will be used to inform the screening of candidate species/habitats for the CHA during Step 2. The study area was determined to include the Protected Areas (PAs) that overlap with the Project area, that includes two legally PAs defined in terms of the Natura 2000 network of sites in Europe (see map in **Figure 3**):

- ROSPA0015 'Câmpia Crișului Alb și Crișului Negru' - Special Protection Area (SPA) and also KBA/IBA;
- ROSCI0231 'Nădab - Socodor – Vărșad' - Site of Community Importance (SCI).

The Aol is defined in the Biodiversity Impact Assessment (BIA) prepared for the ESIA, and includes the following (see map in **Figure 3**):

- For **avifauna (birds and bats)**, the Aol was defined conservatively to be a **5 km buffer** from the Project layout to account for local movement of highly mobile species of birds and bats moving between breeding/resting areas and foraging/hunting grounds. Protected area, KBA and IBA boundaries overlapping and in proximity to the Project were also included.
- For **terrestrial ecosystems, habitats, flora and fauna species**, the Aol was defined as a **500 m buffer**, given the highly transformed (agricultural) landscape with limited natural habitat, poor connectivity and limited natural habitat continuity, based on the estimated connectivity between remaining natural areas and ecological corridors, most notably those associated with the Natura 2000 protected areas coverage and the mosaic of steppic grassland and salt marsh habitats.
- For **aquatic ecosystems, habitats and species**, the Aol was extended to a **1 km buffer** to account for hydrological connectivity in the landscape and potential downstream impacts from the Project. This included the network of agricultural drains, canals and wetlands/salt marsh habitats in the Project area and those associated with the Natura 2000 site 'Nădab - Socodor – Vărșad'.

As the Project is not located within a known migratory corridor or key flyway for migratory bird species, the study area did not specifically consider broader migratory aspects, including those of large mammals species due to the limited connectivity and absence of species such as carnivores (wolves/bears) and threatened ungulates that typically have large ranges and migrate great distances.

FIGURE 3 MAP SHOWING THE STUDY AREA FOR THE CHA

Information/data sources: TLCommunications, using Client-provided data and public 'creative commons' / 'free-to-use' GIS datasets, Natura 2000 sites coverage (European Environmental Agency/EAA coverage dated 2024), background imagery: Google Earth™ Satellite™.

2.2 Step 2: Initial Screening of Species and Habitats

2.2.1 Initial Screening of Habitats

For habitats, initial screening relied primarily on desktop review of information concerning the different habitat types associated with the Natura 2000 sites that overlap with the Project and further validated against the field verification studies for habitat and flora completed for the Project in 2021 and 2024. Candidate habitats for the CHA were selected where these potentially fulfill the criteria for CH/PBF of EBRD and IFC (see detail under Step 4 concerning criteria and thresholds), which include:

- Habitats that are globally CR/EN according to the IUCN;
- High priority habitats for conservation in terms of regional or national conservation planning;
- Habitats listed in Annex I of the EU Habitats Directive; and
- Habitats listed in Resolution 4 of the Bern Convention.

2.2.2 Initial Screening of Species

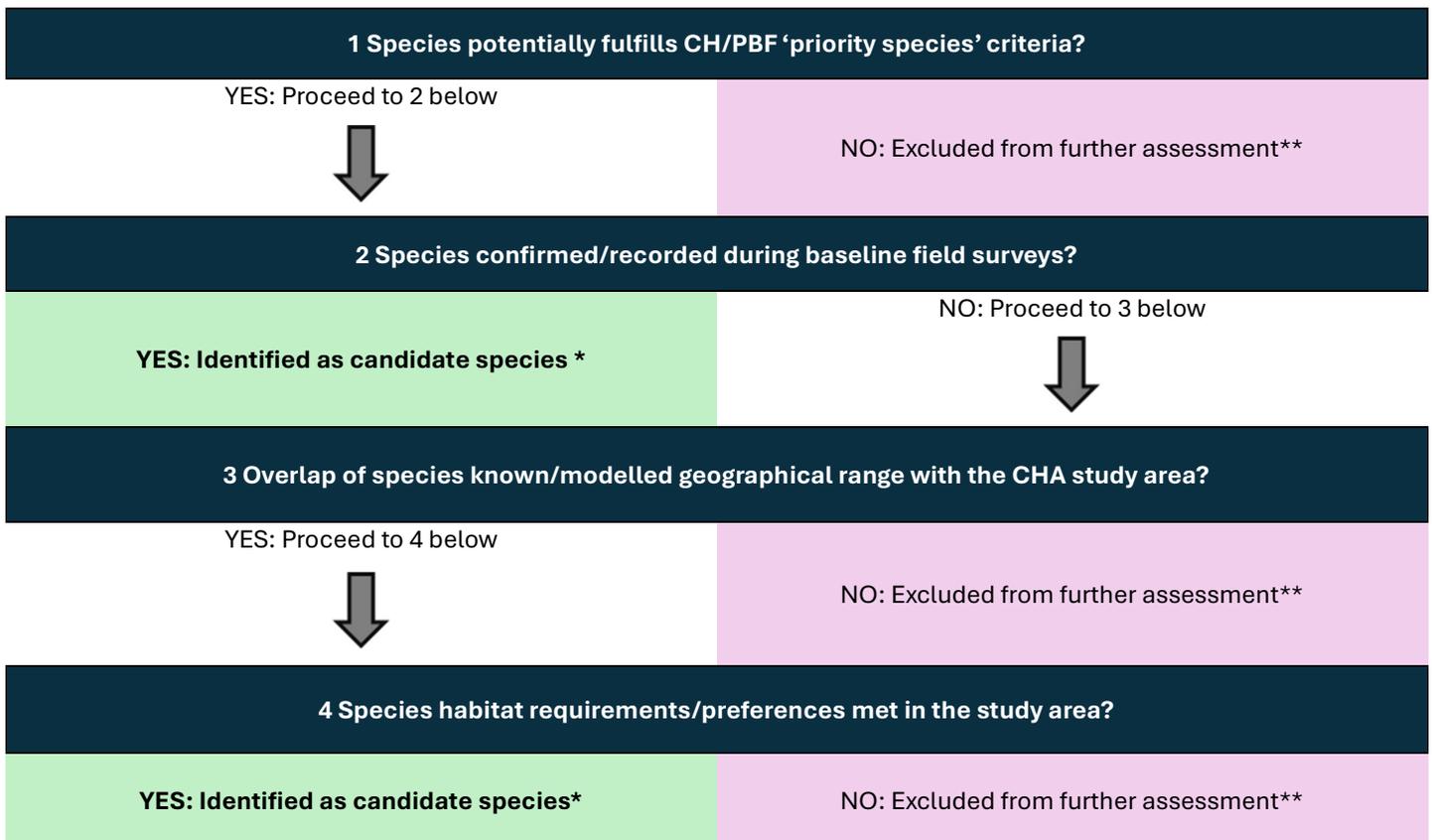
Initial screening of species considered the list of flora and fauna species of conservation concern (i.e. threatened species, endemics, migratory species, etc.) outputted using IBAT, for a 50 km buffer area as per the IUCN RDL for threatened species (in fact, separate species lists intersecting a buffer of 1km, 10 km and 50km from the Project were outputted by IBAT). This was supplemented with records of species qualifying for the overlapping Natura 2000 sites and KBA/IBA as well as available species records/observations for threatened species from the Global Biodiversity Information Facility (GBIF).

The species list is exhaustive and there are many species that can be screened-out of the CHA simply on the basis of not meeting CH/PBF criteria and/or not being present in the study area. This initial screening was therefore done to refine the list of species for further assessment. Using the species distribution and ecological data found on the IUCN online database (<https://www.iucnredlist.org>), potential presence and identification of candidate species for further assessment was done following a simple, logical step-wise process that considered the following criteria (shown graphically below in **Figure 4**):

- Overlap of the known/modelled geographical range/distribution and altitudinal range of species with the CHA study area;
- Presence of suitable habitat and ecological conditions in the study area to meet species requirements/preferences;
- Confirmed presence as a result of field verification surveys / GBIF records and observations;
- Potentially fulfilling the ‘priority species’ criteria for CH/PBF qualification of the EBRD and IFC (see detail under Step 4 concerning criteria and thresholds), that includes: globally/regionally/nationally threatened species (CR, EN, VU), species listed in Annex II of the EU Habitats Directive, Annex I of the EU Birds Directive or Resolution 6 of the Bern Convention, endemic and restricted-range species, migratory species and congregatory species.

Essentially, where the particular species potentially fulfills one or more of the priority species criteria for CH/PBF qualification and is potentially present (or recorded and confirmed present during field surveys), then this qualified the species as a candidate species for further assessment following steps 3 and 4 that follow below. If none of these criteria are met, the species was excluded from further analysis as it is deemed not to qualify as CH/PBF or highly unlikely to.

FIGURE 4 DIAGRAM SHOWING THE STEP-WISE SPECIES SCREENING PROCESS USED IN THE CHA



* Species identified as 'candidate species' for further assessment under steps 3 and 4

** Species not a candidate species for further assessment under steps 3 and 4

Source: TLCommunications, unpublished

2.3 Step 3: Defining the EAAA

For the candidate species and habitats identified under Step 2 (above), the assessment proceeded further to determine an Ecologically Appropriate Area of Analysis (EAAA) to inform the further analysis against criteria and thresholds (step 4). Essentially, the EAAA is used to test the criteria/thresholds to determine if these areas qualify as CH.

The study area for the CHA and EAAAs for species can therefore typically extend well beyond a Project's physical footprint and are usually anticipated to be greater than the Area of Influence (AoI) while taking into account individual species ecology. *It is nevertheless permissible to have a study area that captures a number of species or to have a series of areas depending on ecosystem or ecological factors.*

This followed the guidelines contained in EBRD GN ESR 6 (EBRD, 2025) and IFC PS 6 GN 6 (IFC, 2019), which were used to inform the EAAA definition and mapping:

- EAAA are ecologically determined and defined based on the ecology of the ecosystem or species, encompassing wider distributions of potentially affected biodiversity features and the ecological patterns, processes, connectivity and functions that are necessary for maintaining them throughout this distribution.
- EAAA will have a clear boundary within which the character of the habitats, biological communities and/or management uses have more in common with each other than those of adjacent areas (EBRD, 2025).
- Importantly, where there is already a protected area or KBA designed for species/habitats of concern, the EAAA should share those boundaries, unless there is strong evidence supporting an adjustment (EBRD, 2025).
- For large landscape areas, an EAAA can also be defined within that large landscape based on geographic sub-boundaries, such as watersheds and using topographical or artificial boundaries that break connectivity between ecosystems and habitats.
- EBRD (2025) also mention that "*where it can be shown that multiple values have largely overlapping ecological requirements and distributions, a common or aggregated EAAA may be appropriate*". IFC GN6 (2019) also has a similar approach mentioned. This may be the case for species that use the same habitats or where habitats overlap and a single aggregated EAAA can be used.
- Non-contiguous small patchy habitats can also be grouped into a single EAAA or divided into multiple EAAAs considering proximity and connectivity.

2.4 Step 4: Applying CH/PBF Criteria

Each candidate species potentially occurring, or confirmed occurring, in the study area and EAAA (following steps 2 and 3 above), was then tested or evaluated for qualification as CH and PBF using the relevant criteria and thresholds of the IFC and EBRD, collectively. These are globally accepted scientific criteria and thresholds developed from the IUCN's KBA (Key Biodiversity Area) standard, with those of EBRD being generally consistent with the IFCs. As the Project has adopted the E&S standards/requirements of two different IFIs (IFC and EBRD) as the 'applicable standards' for the Project, which each having their own unique set of criteria and thresholds for screening CH, these have been grouped into categories that align with the criteria of each IFI, as per **Table 2** below, in order to simplify the assessment and presentation of findings/results.

TABLE 2 GROUPING OF CH CRITERIA

#	Criteria grouping	CH Criteria of Selected IFIs	
		EBRD	IFC
1	Threatened / Unique Ecosystems and Habitats	Criterion 1 (a), (b), (c)	Criterion 4
2	Priority Species: Threatened Species	Criterion 2 (a), (b), (c)	Criterion 1
3	Priority Species: Endemic and restricted-range species	Criterion 3 (a)	Criterion 2
4	Priority Species: Migratory and/or congregatory species	Criterion 4 (a), (b)	Criterion 3
5	Key Evolutionary Processes	<i>n/a</i>	Criterion 5

Source: TLCommunications, informed by IFC (2019) and EBRD (2024)

2.4.1 EBRD Criteria & Thresholds

The EBRD criteria are as follows:

Criterion 1. Priority ecosystems/habitats

- Threatened ecosystems/habitats
 - (a) Habitats listed in Annex 1 of EU Habitats Directive or Resolution 4 of Bern Convention
 - (b) IUCN Red-List EN or CR ecosystems
 - (c) Ecosystem/habitats listed in national systematic conservation planning

Criterion 2. Priority species and their habitats

- Threatened species
 - (a) Species and their habitats listed in EU Habitats Directive and Birds Directive or Bern Convention
 - (b) IUCN Red List VU, EN or CR species
 - (c) IUCN national or regional (e.g., Europe) Red List EN or CR species (or analogous national listing)
- Range-restricted species
- Migratory and congregatory species

The EBRD thresholds for CH differ quite markedly to those of IFC, however, in that they include species/habitats listed in terms of the EU Habitats Directive and EU Birds Directive for example, and thresholds also exist for the determination of PBF. These are presented below in **Table 3**.

TABLE 3 EBRD CRITERIA AND THRESHOLDS FOR CH AND PBF

Criterion	Priority Biodiversity Feature (PBF)	Critical Habitat (CH)
Criterion 1: Priority ecosystems		
1 Threatened ecosystems/habitats		

Criterion	Priority Biodiversity Feature (PBF)	Critical Habitat (CH)
(a) Habitats listed in Annex 1 of EU Habitats Directive* or Resolution 4 of Bern Convention** (b) IUCN Red-List EN or CR ecosystems (c) Ecosystem/habitats listed in national systematic conservation planning	(a) Habitat type listed in Annex 1 of EU Habitats Directive* or Resolution 4 of Bern Convention** (b) Ecosystem type with IUCN status of EN or CR	(a) Habitat type listed in Annex 1 of EU Habitats Directive marked as “priority habitat type” * (b) EAAA ≥ 5% of global extent of an ecosystem type with IUCN status of CR or EN (c) EAAA for ecosystem/habitat determined to be of high priority for conservation by national systematic conservation planning
Criterion 2: Priority Species and their Habitats		
2 Threatened Species		
(a) Species and their habitats listed in EU Habitats Directive and Birds Directive* or Bern Convention** (b) IUCN Red List VU, EN or CR species (c) IUCN national or regional (e.g., Europe) Red List EN or CR species (or analogous national listing)	(a) Species in the area of impact listed in Annex II of Habitats Directive, Annex I of Birds Directive* or Resolution 6 of Bern Convention ** (b) Species in the area of impact with IUCN global Red List status of VU, EN or CR. (c) Species in the area of impact with national or regional status of EN or CR	(a) EAAA supports species listed in Annex II of Habitats Directive marked as “priority species” * (b) EAAA supports ≥ 0.5% of the global population AND ≥ 5 reproductive units of a CR or EN species, or EAAA supports globally significant population of VU species necessary to prevent a change of IUCN Red List status to EN or CR (c) EAAA for important concentrations of species with national or regional status of EN or CR
3 Range-restricted species		
(a) All range-restricted species	(a) All range-restricted species in the area of impact	(a) EAAA regularly holds ≥ 10% of global population AND ≥ 10 reproductive units of the species
4 Migratory and congregatory species		
(a) All migratory species (b) All congregatory species	(a) All migratory species in the area of impact	(a) EAAA sustains, on a cyclical or otherwise regular basis, ≥ 1 percent of the global population at any point of the species’ lifecycle (b) EAAA predictably supports ≥10 percent of global population during periods of environmental stress

*Applies to EU Member States only (candidates for EU membership also included)

**Applies to BERN Convention signatory nations only

Source: adapted from EBRD (November 2025) – updated Guidance Note 6 regarding PR 6

Note on applicability of EU Directives: The updated GN for ESR 6 (EBRD, 2025) specifies that the criteria and thresholds regarding certain species and habitats listed in terms of the EU Directives (EU Habitats Directive, EU Birds Directive and the Bern Convention) apply to EU member states and also to candidate countries for membership in the EU. This is a departure from the previous guidance which excluded EU non-member states and candidate countries. Countries outside of the EU (non-members and non-candidates for membership to the EU) and countries that are not Bern Convention Signatories will not be required by ERBRD to refer to the EU Directives or Bern Convention on the Conservation of European Wildlife and Natural Habitats (Annexes) when identifying CH or PBF.

2.4.2 IFC Criteria & Thresholds

Five qualifying criteria for CH are considered in terms of IFC PS 6 GN 6 (IFC, 2019), as follows:

- **Criterion 1:** Habitat of significant importance to Critically Endangered (CR) and/or Endangered (EN) species.
- **Criterion 2:** Habitat of significant importance to endemic and/or restricted range species.
- **Criterion 3:** Habitat supporting globally significant concentrations of migratory species and/or congregatory species.
- **Criterion 4:** Highly threatened and/or unique ecosystems.
- **Criterion 5:** Areas associated with key evolutionary processes.

These five criteria are essentially ‘triggers’ in that if an area of habitat meets any one of the qualifying criteria and is within the defined thresholds described in **Table 4** (Error! Reference source not found.), it will be considered CH irrespective of failing to meet any other criterion. The CH criteria therefore have two distinctive characteristics:

- firstly, components of biodiversity are essentially assigned to only two levels of conservation significance, those that trigger Critical Habitat and those that do not; and
- secondly, each criterion is applied separately and not in combination, meaning that the scores are not cumulative, such that a species may be screened in more than one criterion [e.g. a Critically Endangered (CR) species that is also endemic or restricted in terms of range].

TABLE 4 IFC CRITERIA AND THRESHOLDS FOR CH

Criteria	Thresholds
Criterion 1: <i>Habitat of significant importance to Critically Endangered (CR) and/or Endangered (EN) species.</i>	(a) Areas that support globally-important concentrations of an IUCN Red-listed EN or CR species (0.5 % of the global population AND 5 reproductive units of a CR or EN species); (b) Areas that support globally-important concentrations of an IUCN Red-listed VU species, the loss of which would result in the change of the IUCN Red List status to EN or CR and meet the thresholds in (a). (c) As appropriate, areas containing nationally/regionally-important concentrations of an IUCN Red-listed EN or CR species.
Criterion 2: <i>Habitat of significant importance to endemic² and/or restricted-range species.</i>	(a) Areas that regularly hold ≥ 10 % of the global population size AND ≥ 10 reproductive units of a species.
Criterion 3: <i>Habitat supporting globally significant concentrations of migratory³ species and/or congregatory⁴ species.</i>	(a) Areas known to sustain, on a cyclical or otherwise regular basis, ≥ 1 % of the global population of a migratory or congregatory species at any point of the species’ lifecycle. (b) Areas that predictably support ≥ 10 % of the global population of a species during periods of environmental stress.

² In terms of IFC PS6 GN6 (2019), the term ‘endemic’ is defined as restricted-range, which refers to a limited extent of occurrence (EOO) for a particular species. For terrestrial vertebrates and plants, restricted-range species are defined as those species that have an EOO less than 50,000 km² (IFC, 2019).

³ Migratory species are defined as any species of which a significant proportion of its members cyclically and predictably move from one geographical area to another (including within the same ecosystem) (IFC, 2019).

⁴ Congregatory species are defined as species whose individuals gather in large groups on a cyclical or otherwise regular and/or predictable basis (IFC, 2019).

Criteria	Thresholds
Criterion 4: <i>Highly threatened and/or unique ecosystems</i> ⁵ .	(a) Areas representing $\geq 5\%$ of the global extent of an ecosystem type meeting the criteria for IUCN status of CR or EN. (b) Other areas, not yet assessed by IUCN, but determined to be of high priority for conservation by regional or national systematic conservation planning.
Criterion 5: <i>Areas associated with key evolutionary processes</i> ⁶ .	No set thresholds.

Source: adapted from IFC (2019) - Guidance Note 6 regarding PS 6

Note regarding the use of population surrogates / proxies: In the absence of precise or reliable population data, proxies such as the proportion of a species' distribution in the area, have been used to inform the CH determination for criteria that consider species. Appropriate population surrogates including Extent of Occurrence (EOO), range, or known sites of occurrence (mainly derived from the IUCN Red List data), were used to determine significance with respect to the global population (see IFC, 2019: Guidance Note 77). Where there is uncertainty about the population, range, and distribution of potentially occurring biodiversity features within the study area, a precautionary approach has been applied, and the feature is retained for further assessment.

2.5 Key Data Sources

Data sources used to inform the CHA included:

- IBAT PS6 Report (with species list) – See **Appendix A** (section 8.1) of the CHA report, unpublished
- IUCN Red List of Threatened Species (online database), online at: <https://www.iucnredlist.org/>
- Observations/records of threatened species available on the Global Biodiversity information Facility (GBIF) online resource at: https://www.gbif.org/occurrence/map?occurrence_status=present
- Information on Natura 2000 sites from the European Environmental Agency (EAA) 'Natura 2000 Webviewer' online resource: <https://natura2000.eea.europa.eu/>
- Information from the Key Biodiversity Areas (KBA) online resource: <https://www.keybiodiversityareas.org/site/factsheet/24357/site>
- IBA factsheet information from the BirdLife International online resource: <https://datazone.birdlife.org/site/factsheet/24357-c%C3%A2mpia-cri%C5%9Furilor>
- Corine Land Cover (CLC) 2018 dataset, online at: <https://land.copernicus.eu/en/products/corine-land-cover>
- EUNIS (European Nature Information System) Habitat Classification System and Crosswalks (European Environmental Agency, EAA, 2022), online at: <https://www.eea.europa.eu/en/datahub/>
- Global Critical Habitat Screening Layer V2.1 (UNEP-WCMC, 2025), online at: <https://www.unep-wcmc.org/en/news/unep-wcmc-updates-the-global-critical-habitat-screening-layer>
- Report on the Supplementary field verification of priority (Pannonic steppe/salt marsh) habitats for the Project (Wilderness Research and Consultancy, 2024), unpublished
- Client data on the latest development layout for the Project, unpublished

⁵ Unique ecosystems encompass those natural systems and environments that are considered to be rare or one-of-a-kind and therefore not widely represented (depending on what scale these are assessed) and therefore may be considered to be of inherently great conservation importance and high irreplaceability value. What makes an ecosystem unique is somewhat open to interpretation, but typically requires a multi-faceted assessment of several supporting criteria (IFC, 2019).

⁶ Key evolutionary processes that give rise to regional configurations of species and ecological properties can be influenced by the structural attributes of a region, such as its topography, geology, soil, temperature, and vegetation, and combinations of these variables (IFC, 2019).

3. Results

3.1 Initial Screening of Species and Habitats (Step 2)

3.2 Candidate Habitats

Potential candidate habitats were identified and screened based on mapping and land use/habitat in the CHA study area based on Corine Land Cover (CLC) data from 2018, which was translated to the comparative EUNIS (European Nature Information System) habitat types and Annex I types (EU Habitats Directive) using the 'EUNIS habitat classification and cross-walks (tabular data)' published online by the European Environmental Agency (EEA). The CLA types are shown on the map in **Figure 5** and the corresponding EUNIS/Annex I types are listed in **Table 5**.

The land use/habitat mapping shows that much of the areas is considered to be modified under agricultural activity, with dominated of heavily modified arable land and untransformed pastures where livestock grazing takes place. Natural forest habitat is notably lacking (apart from some small patches in the east within the broader Natura 2000 site). Wetlands and aquatic ecosystems are represented in the terms of the CLC dataset which is relatively coarse and high-level, with a few watercourses associated with drainage lines, streams and river that drain to the north of the Project site.

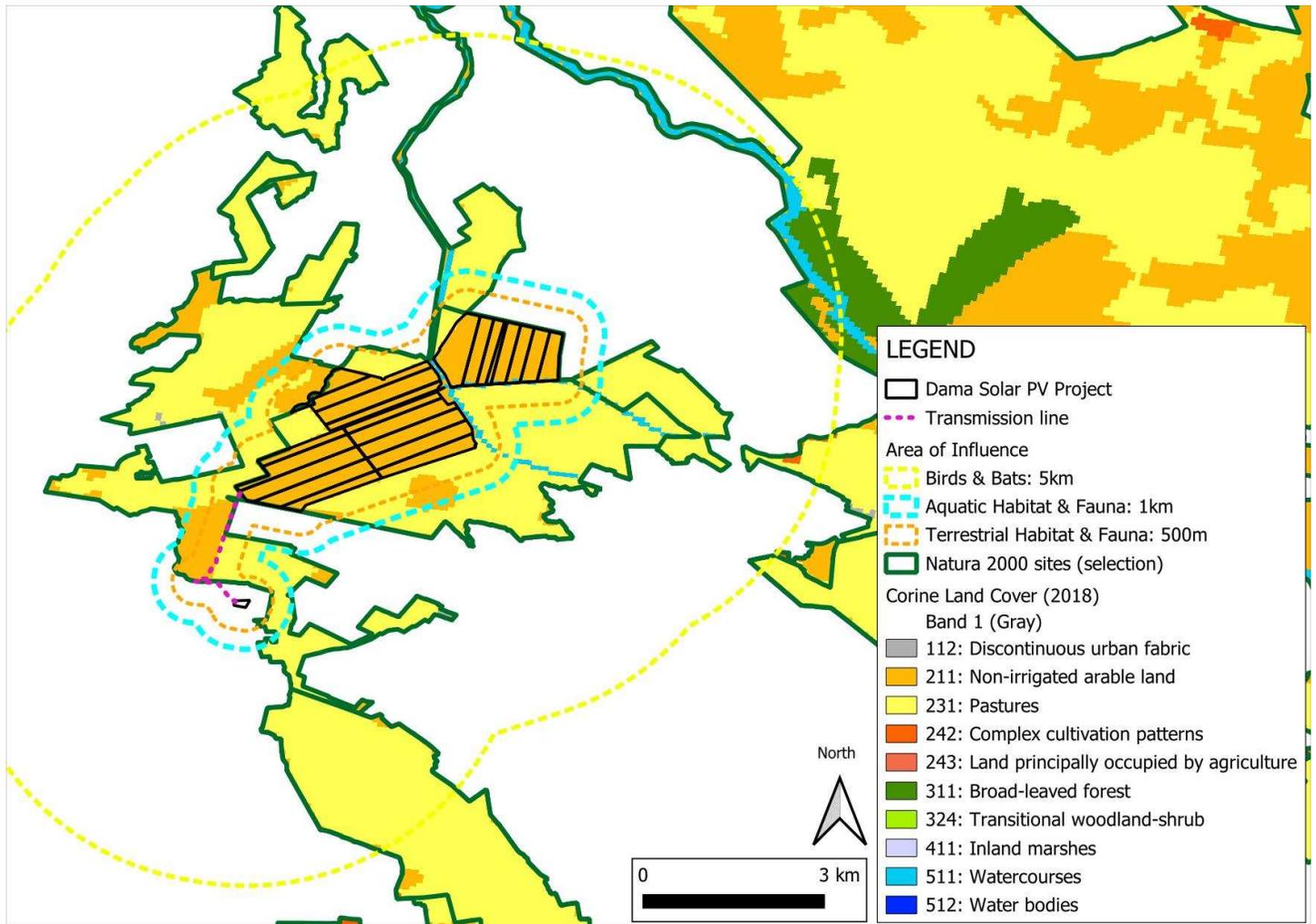
Two Annex I habitat types listed in the EU Habitats Directive (protected habitats) are classified and are qualifying/conserved values for the Natura 2000 site (ROSCI0231: Nădab - Socodor – Vârșad) that overlaps with the Project:

- 1530* Pannonic salt steppes and salt marshes *(priority habitat type)
- 6440 Alluvial meadows of river valleys of the *Cnidion dubii*

The corresponding EUNIS/Annex I types listed for the study area (**Table 5** and **Figure 5**) were rapidly screened against the EBRD/IFC criteria in terms of whether these are considered regionally threatened (CR/EN) according to the European Red List of threatened habitats (EU, 2016) conservation threat status as well as listing in Annex I of the EU Habitats Directive. This process identified the following Annex I habitats that potentially qualify as CH/PBF and which were included as candidates for further analysis under steps 3 and 4:

- 1340 Inland salt meadows
- 1310 Salicornia and other annuals colonizing mud and sand
- 1530* Pannonic salt steppes and salt marshes (***priority habitat type**), Endangered threat status regionally (Europe)
- 6270 Fennoscandian lowland species-rich dry to mesic grasslands
- 6440 Alluvial meadows of river valleys of the *Cnidion dubii*

FIGURE 5 LAND COVER/HABITAT MAP FOR THE CHA STUDY AREA



Information/data sources: TLCommunications, using Client-provided data and public 'creative commons' / 'free-to-use' GIS datasets, Natura 2000 sites coverage (European Environmental Agency/EAA coverage dated 2024), Corine Land Cover (CLC), 2018.

TABLE 5 CANDIDATE HABITAT TYPES SCREENING TABLE

Corine Land Cover Class (2018)	Corresponding EU Habitat Type		
	EUNIS habitat class (2021)	EU Red List habitat type with Threat Status (2016)	Annex I habitat type (EU Habitats Directive)
112: Discontinuous urban fabric	n/a	n/a	n/a
211: Non-irrigated arable land	V11: Intensive unmixed crops	n/a	n/a
	V12: Mixed crops of market gardens and horticulture		
	V15: Bare tilled, fallow or recently abandoned arable land		
231: Pastures	R21: Mesic permanent pasture of lowlands and mountains	E2.1a: Mesic permanent pasture of lowlands and mountains (VU)	6270 Fennoscandian lowland species-rich dry to mesic grasslands
	V34: Trampled xeric grasslands with annuals	n/a	n/a
	V35: Trampled mesophilous grasslands with annuals		
242: Complex cultivation patterns	V21: Large-scale ornamental garden areas	n/a	n/a
	V22: Small-scale ornamental and domestic garden areas		
	V23: Recently abandoned garden areas		
243: Land principally occupied by agriculture with significant natural vegetation	V37: Annual anthropogenic herbaceous vegetation	n/a	n/a
	V38: Dry perennial anthropogenic herbaceous vegetation		
	V39: Mesic perennial anthropogenic herbaceous vegetation		
324: Transitional woodland/shrub	R51 Thermophilous forest fringe of base-rich soils	E5.2a: Thermophilous woodland fringe of base-rich soils (LC)	n/a
	R52 Forest fringe of acidic nutrient-poor soils	E5.2b: Thermophilous woodland fringe of acidic soils (LC)	
	R53 Macaronesian thermophilous forest fring	E5.2c: Macaronesian thermophilous woodland fringe (NT)	
	R57 Herbaceous forest clearing vegetation	n/a	

Corine Land Cover Class (2018)	Corresponding EU Habitat Type		
	EUNIS habitat class (2021)	EU Red List habitat type with Threat Status (2016)	Annex I habitat type (EU Habitats Directive)
	V63 Lines of planted trees		
	V64 Small deciduous broadleaved planted other wooded land		
	V65 Small evergreen broadleaved planted other wooded land		
	V66 Small coniferous planted other wooded land		
411: Inland marshes	R63: Temperate inland salt marsh	E6.3: Temperate inland salt marsh (EN)	1340 Inland salt meadows 1310 Salicornia and other annuals colonizing mud and sand 1530 * Pannonic salt steppes and salt marshes
511: Watercourses	-	-	6440 Alluvial meadows of river valleys of the <i>Cnidion dubii</i>

Source of data/information: Corine Land Cover Dataset, EU Red List of Terrestrial habitats, EUNIS classification, EU Habitats Directive (Annex I), EUNIS classification and cross-walks (EEA, 2022)

3.3 Candidate Species

Based on the IUCN species list returned in the IBAT assessment that could potentially occur within a 50 km range of the Project (based on known/modelled distribution and ranges for species), there are a total of 923 species that could potentially occur. The large majority (796 species) are species of LC globally. This is a massive dataset to screen in terms of CH/PBF, and therefore the approach rapidly refined this species list further based on the 10 km buffer included in the IBAT assessment, which returned a refined list of 319 species that could possibly be present in the CHA study area, including fauna (mammals, herpetofauna, birds, invertebrates, fish and plants/fungi). These species were subject to initial screening (as per the approach in Chapter 2) which resulted in further refinement of this large dataset and the identification of 'candidate species' that could potentially be present and qualify as CH/PBF based on:

- Possibility of meeting CH/PBF criteria (based on species threat and protection status globally, regionally and nationally)
- Overlapping known/modelled distribution and ranges (geographical and altitudinal)
- Presence of suitable habitat within the study area for supporting key species
- Actual records/observations based on field surveys
- Actual observations/records of threatened from GBIF (records of threatened/near-threatened mammals and birds included *Spermophilus citellus*, *Numenius arquata*, *Vanellus vanellus*, *Falco vespertinus*)

The refined list of candidate species amounted to 140 species in total, including mostly bird species but also amphibians, reptiles, mammals (including bats) and plants. Fish species were screened out completely due to status as regionally extinct, no overlap with the study area or habitat requirements not being met.

137 of these would likely qualify as PBF, with 33 that could potentially qualify as CH and which were subject to further screening under Steps 3 and 4 that follow. See the details in **Table 6** below.

TABLE 6 CANDIDATE SPECIES SCREENING TABLE

Species Group/Class	# Species Screened	# Candidate Species	# Excluded Species	# Qualifying as PBF?	# Potentially qualifying as CH?
Amphibians	8	4	4	4	-
Reptiles	3	1	2	1	-
Mammals	31	7	24	7	5
Birds	131	110	21	110	15
Invertebrates	99	7	92	5	4
Fish	9	-	9	-	-
Plants and fungi	38	11	27	10	9
Totals	319	140	179	137	33

Source of information/data: TLCommunications, based on species screening informed by IBAT and IUCN database

The list of candidate species of fauna and flora considered for further assessment is presented in **Table 7** below, with the complete list with details on threat status/protection status of candidate species considered in the CHA, for CH and PBF screening, included as **Annexure A** (section 7.1) and **Annexure B** (section 7.2) of this report, respectively.

TABLE 7 CANDIDATE SPECIES LIST

Scientific Name	Common Name
Herpetofauna: amphibians and reptiles	
<i>Bombina bombina</i>	European fire-bellied toad
<i>Pelobates fuscus</i>	Common Spadefoot

Scientific Name	Common Name
<i>Triturus cristatus</i>	Great Crested Newt
<i>Triturus dobrogicus</i>	Danube Crested Newt
<i>Emys orbicularis</i>	European Pond Turtle

Scientific Name	Common Name
Mammals (including bats)	
<i>Cricetus cricetus</i>	Common Hamster
<i>Eptesicus serotinus</i>	Eurasian Serotine
<i>Lutra lutra</i>	Eurasian Otter
<i>Miniopterus schreibersii</i>	Schreiber's Bent-winged Bat
<i>Mustela eversmanii</i>	Steppe Polecat
<i>Myotis dasycneme</i>	Pond Bat
<i>Spermophilus citellus</i>	European Ground Squirrel
Birds	
<i>Accipiter nisus</i>	Eurasian Sparrowhawk
<i>Acrocephalus arundinaceus</i>	Great Reed-warbler
<i>Acrocephalus melanopogon</i>	Moustached Warbler
<i>Acrocephalus paludicola</i>	Aquatic Warbler
<i>Acrocephalus schoenobaenus</i>	Sedge Warbler
<i>Acrocephalus scirpaceus</i>	Common Reed-warbler
<i>Alauda arvensis</i>	Eurasian Skylark
<i>Alcedo atthis</i>	Common Kingfisher
<i>Anas acuta</i>	Northern Pintail
<i>Anas clypeata</i>	Northern Shoveler
<i>Anas crecca</i>	Common Teal
<i>Anas penelope</i>	Eurasian Wigeon
<i>Anas platyrhynchos</i>	Mallard
<i>Anas querquedula</i>	Garganey
<i>Anas strepera</i>	Gadwall
<i>Anser albifrons</i>	Greater White-fronted Goose
<i>Anser erythropus</i>	Lesser White-fronted Goose
<i>Anthus campestris</i>	Tawny Pipit
<i>Anthus cervinus</i>	Red-Thorated Pipit
<i>Anthus pratensis</i>	Meadow Pipit
<i>Apus apus</i>	Common Swift
<i>Aquila heliaca</i>	Eastern Imperial Eagle
<i>Ardea alba</i>	Great White Egret
<i>Ardea cinerea</i>	Grey Heron
<i>Ardea purpurea</i>	Purple Heron
<i>Asio flammeus</i>	Short-eared Owl
<i>Asio otus</i>	Northern Long-Eared Owl
<i>Aythya ferina</i>	Common Pochard
<i>Aythya nyroca</i>	Ferruginous Duck
<i>Botaurus stellaris</i>	Eurasian Bittern
<i>Buteo buteo</i>	Eurasian Buzzard
<i>Buteo lagopus</i>	Rough-Legged Buzzard
<i>Calidris alpina</i>	Dunlin
<i>Calidris falcinellus</i>	Broad-billed Sandpiper
<i>Calidris ferruginea</i>	Curlew Sandpiper
<i>Calidris pugnax</i>	Ruff
<i>Calidris pugnax</i>	Ruff

Scientific Name	Common Name
<i>Carduelis carduelis</i>	European Goldfinch
<i>Charadrius dubius</i>	Little Ringed Plover
<i>Chlidonias hybridus</i>	Whiskered Tern
<i>Chroicocephalus ridibundus</i>	Black-headed Gull
<i>Ciconia ciconia</i>	White Stork
<i>Ciconia nigra</i>	Black Stork
<i>Circaetus gallicus</i>	Short-tailed Snake-eagle
<i>Circus aeruginosus</i>	Western Marsh-Harrier
<i>Circus cyaneus</i>	Hen Harrier
<i>Circus macrourus</i>	Pallid Harrier
<i>Circus pygargus</i>	Montagu's Harrier
<i>Columba palumbus</i>	Common Woodpigeon
<i>Corvus frugilegus</i>	Rook
<i>Corvus monedula</i>	Eurasian jackdaw
<i>Coturnix coturnix</i>	Common Quail
<i>Crex crex</i>	Corncrake
<i>Cuculus canorus</i>	Common Cuckoo
<i>Cygnus olor</i>	Mute Swan
<i>Delichon urbicum</i>	Northern House Martin
<i>Egretta alba</i>	Great White Egret
<i>Egretta garzetta</i>	Little Egret
<i>Emberiza schoeniclus</i>	Reed Bunting
<i>Falco cherrug</i>	Saker Falcon
<i>Falco columbarius</i>	Mertlin
<i>Falco peregrinus</i>	Peregrine Falcon
<i>Falco tinnunculus</i>	Common Kestrel
<i>Falco vespertinus</i>	Red-footed Falcon
<i>Fulica atra</i>	Common Coot
<i>Gallinago gallinago</i>	Common Snipe
<i>Gallinula chloropus</i>	Common Moorhen
<i>Grus grus</i>	Common Crane
<i>Haliaeetus albicilla</i>	White-tailed Sea-eagle
<i>Himantopus himantopus</i>	Black-winged Stilt
<i>Hirundo rustica</i>	Barn Swallow
<i>Ixobrychus minutus</i>	Common Little Bittern
<i>Lanius minor</i>	Lesser Grey Shrike
<i>Larus cachinnans/michahellis</i>	Caspian Gull
<i>Larus ridibundus</i>	Black-headed Gull
<i>Limosa limosa</i>	Black-Tailed Godwit
<i>Locustella fluviatilis</i>	River Warbler
<i>Locustella luscinioides</i>	Savi's Warbler
<i>Locustella naevia</i>	Common Grasshopper-warbler
<i>Luscinia megarhynchos</i>	Common Nightingale
<i>Luscinia svecica</i>	Bluethroat
<i>Mareca penelope</i>	Eurasian Wigeon
<i>Merops apiaster</i>	Eurasian Bee-eater

Scientific Name	Common Name
<i>Milvus migrans</i>	Black Kite
<i>Motacilla alba</i>	White Wagtail
<i>Motacilla flava</i>	Western Yellow Wagtail
<i>Numenius arquata</i>	Eurasian Curlew
<i>Numenius phaeopus</i>	Whimbrel
<i>Nycticorax nycticorax</i>	Black-crowned Night-heron
<i>Oenanthe oenanthe</i>	Northern Wheatear
<i>Pandion haliaetus</i>	Osprey
<i>Pernis apivorus</i>	Eurasian Honey-buzzard
<i>Phoenicurus ochruros</i>	Black Redstart
<i>Platalea leucorodia</i>	Eurasian Spoonbill
<i>Pluvialis apricaria</i>	Eurasian Golden Plover
<i>Pluvialis squatarola</i>	Grey Plover
<i>Recurvirostra avosetta</i>	Pied Avocet
<i>Riparia riparia</i>	Collared Sand Martin
<i>Spatula clypeata</i>	Northern Shoveler
<i>Sterna hirundo</i>	Common Tern
<i>Sylvia nisoria</i>	Barred Warbler
<i>Tachybaptus ruficollis</i>	Little Grebe
<i>Tadorna tadorna</i>	Common Shelduck
<i>Tringa erythropus</i>	Spotted Redshank
<i>Tringa totanus</i>	Common Redshank
<i>Troglodytes troglodytes</i>	Northern Wren
<i>Turdus iliacus</i>	Redwing

Scientific Name	Common Name
<i>Turdus pilaris</i>	Fieldfare
<i>Upupa epops</i>	Common Hoopoe
<i>Vanellus vanellus</i>	Northern Lapwing
Invertebrates	
<i>Anisus vorticulus</i>	Lesser Ramshorn Snail
<i>Euglesa pseudosphaerium</i>	False-orb Pea Mussel
<i>Leptophyes discoidalis</i>	Blackwing Speckled Bush-cricket
<i>Lycaena dispar</i>	Large Copper
<i>Myrmecophilus nonveilleri</i>	Serbian Ant-cricket
<i>Nomada errans</i>	Zwartbuikwespbij
<i>Sphaerium nucleus</i>	Swamp Orb Mussel
Plants	
<i>Alisma gramineum</i>	Ribbon-leaved Water-plantain
<i>Bovista paludosa</i>	Fen Puffball
<i>Cirsium brachycephalum</i>	
<i>Elatine alsinastrum</i>	
<i>Galeopsis segetum</i>	Downy Hemp-nettle
<i>Gastrosporium simplex</i>	Steppentrüffel
<i>Hygrocybe aurantiosplendens</i>	Orange Waxcap
<i>Marsilea quadrifolia</i>	Water Shamrock
<i>Picipes rhizophilus</i>	Steppengras-Schwarzfußporlin
<i>Tozzia carpathica</i>	Carpathian Tozzia
<i>Utricularia bremii</i>	New Forest Bladderwort

Source of information/data: TLCommunications, based on species screening informed by IBAT and IUCN database

Note that the full list of 319 species subject to initial screening (which contains also the excluded species that were not identified as candidates for further analysis) has not been included in the report due to the sheer number of species; however, a separate MS Excel Sheet has been developed that contains all the screening information for these species and which should be referred to as a key reference included as **Appendix C**.

3.4 Define EAAA (Step 3)

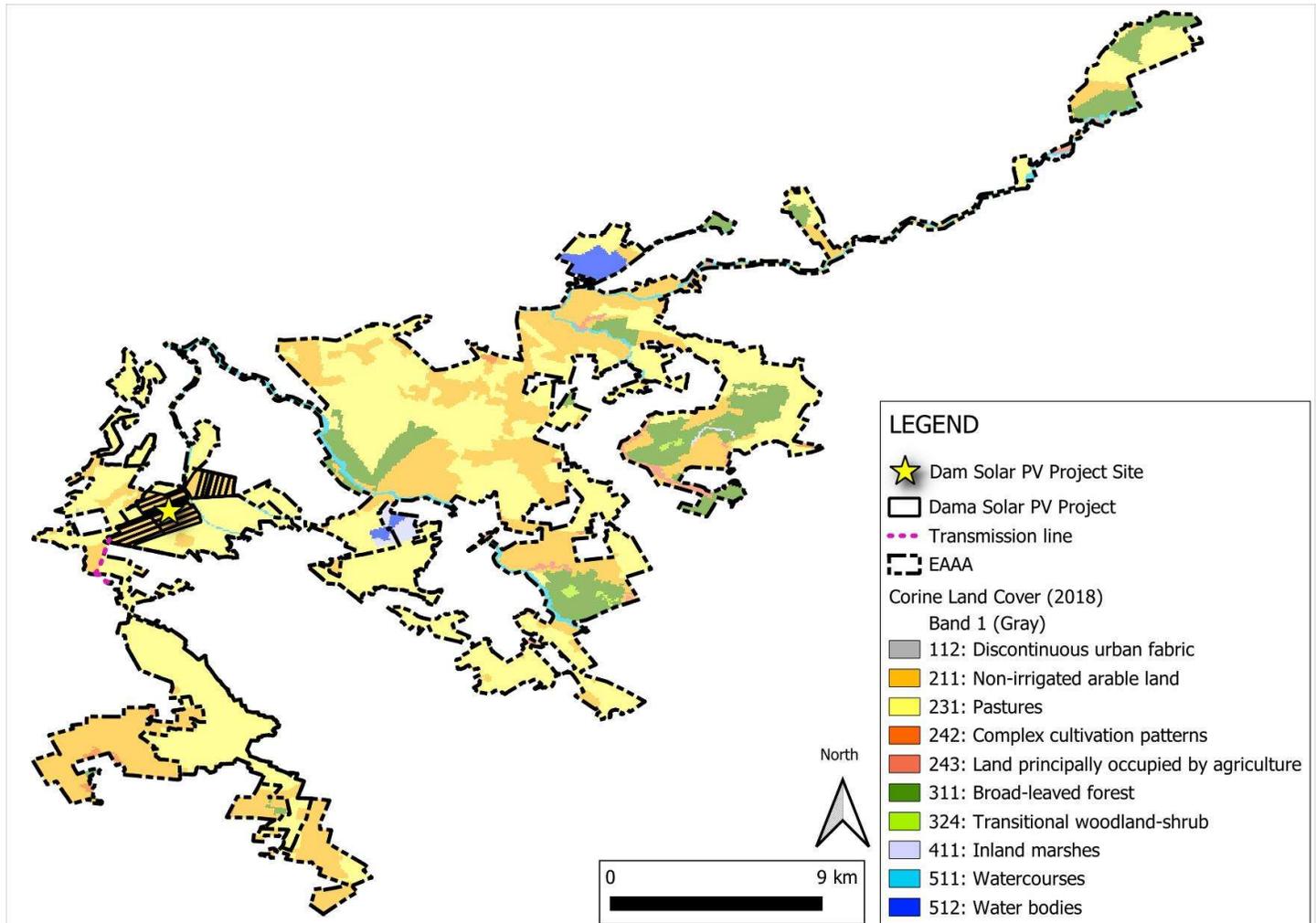
Typically, an EAAA is defined for each candidate species requiring screening against the CH criteria and thresholds (not necessarily relevant to PBF (which qualify based on presence and threat/protection status listing in EU Directives alone with no specific thresholds). For candidate species that may qualify as CH and where further analysis is required, this included 33 species, most being birds and mammals as well as flora (plants, fungi).

Defining separate EAAAs for each species would be challenging and time-consuming, and therefore a more efficient and practical approach was taken, informed by the guidance of the IFC and EBRD Guidance Notes, which indicate that “where it can be shown that multiple values have largely overlapping ecological requirements and distributions, a common or aggregated EAAA may be appropriate” (EBRD, 2025). In this case, species of waterbirds and terrestrial bird species, terrestrial and semi-aquatic mammals and herpetofauna as well as terrestrial and semi-aquatic plants and invertebrates were identified as candidate species for CH. These share common habitat requirements that include the salt marsh/wetlands, drier steppe grassland, pastures and cultivated areas in the CHA study area and those represented within the overlapping Natura 2000

sites, KBA and IBA. Therefore, a single EAAA has been defined that incorporates the boundaries of the Natura 2000 sites that intersect the Project (entire protected area boundary included), and which includes mainly agricultural land, pastures, salt marshes, watercourses (streams, rivers) and a few wooded patches (forest, woodland, shrubland mosaic).

This is indicated on the EAAA map below in **Figure 6**, with the EAAA being relatively large and having a total estimated extent of 46,940 hectares (ha) [equates to 469.4 km²].

FIGURE 6 MAP SHOWING THE EAAA DEFINED FOR THE PROJECT



Information/data sources: TLCommunications, using Client-provided data and public 'creative commons' / 'free-to-use' GIS datasets, Natura 2000 sites coverage (European Environmental Agency/EAA coverage dated 2024), Corine Land Cover (CLC), 2018.

3.5 Evaluation of CH/PBF against Criteria/Thresholds (Step 4)

3.6 Threatened Ecosystems and Habitats

The following Annex I habitats potentially qualify as CH/PBF and were included as candidates for further analysis:

- 1530* Pannonic salt steppes and salt marshes *(priority habitat type, regionally EN) – would qualify as CH
- 1340 Inland salt meadows – would be PBF
- 1310 Salicornia and other annuals colonizing mud and sand – would be PBF

- 6270 Fennoscandian lowland species-rich dry to mesic grasslands – would be PBF
- 6440 Alluvial meadows of river valleys of the *Cnidion dubii* – would be PBF

Based on the habitat surveys completed for the Project as part of the baseline assessment (based on the field surveys by Wildlife Management Consulting srl, 2021⁷), the following findings are of particular relevance:

- Sampled plots within the development footprint and immediately adjacent areas were found to be agricultural land (arable land) that were either entirely cultivated, partly cultivated or uncultivated (ploughed/bare) at the time of surveys. These habitats were dominated almost exclusively by two key native species of plants: *Hordeum geniculatum* (Geniculate Barley, LC) and *Puccinella limosa* (n.a.) which are typical indicator species of a disturbance regime with characteristic ruderal habitat typical of cultivated lands and areas subject to livestock grazing such as pastures.
- Salt-tolerant (halophilic) species were also recorded that are characteristic of salt steppe habitats in the Pannonic region. An example of one of the dominant halophytes found at the site is *Bolboschoenus maritimus* (Sea-club Rush, LC), a species belonging to the sedge family (Cyperaceae) and which typically grows on the margins of permanent or semi-permanent waters, brackish and salt water lagoons, back mangroves and margins of salt marshes as well as freshwater habitats (according to the IUCN description). This suggests that saline wetlands habitats are likely to be present, at least within areas adjacent to the cultivated fields on the development site. Indeed, the characteristic Annex I habitat type for the Project area is 'Pannonic salt steppes and salt marshes' (code 1530) which is a priority habitat type conserved within the Natura 2000 site that overlaps the Project area.
- The area has also been subjected to intensive modification through artificial drainage of the wet areas as a result of drainage canals constricted to lower the water table and efficiently drain water from the site to support dryland farming and grazing. There are no natural rivers/streams, with canalization and straightening of drainage lines having taken place.
- Wooded habitat associated with forest, woodland or shrubland vegetation communities were notably absent from the site, with the exception of a few artificial/planted linear hedgerows in places.

The local Romania consulting firm, Wilderness Research and Consultancy, conducted a follow-up survey of the site in September 2024 to field verify the location and boundaries of habitat in the Project area and surrounds that potentially qualifies as CH (Pannonic salt steppes and salt marshes type). A combination of visual assessment, drone surveys and vegetation sample plots that considered vegetation structure and composition were used to validate the habitat types. The findings of this survey and supplementary assessment are contained in the report by Wilderness Research and Consultancy and ERM (2024) which is included as **Appendix B** (section 8.2) of this CHA report, which confirmed the location and extent of Pannonic salt steppes and salt marshes (CH) and resulted in a refined and detailed mapping of these areas in relation to the Project layout. This was ultimately used to revise the development boundary to avoid locating infrastructure and activities within these areas of critical habitat.

Conclusion regarding CH:

The findings of the baseline surveys support the classification of habitats as either modified arable lands, which would not qualify as CH or PBF and **Pannonic salt steppes and salt marshes (code 1530*) which qualifies as CH given its regionally EN threat status and most importantly, listing as a priority habitat in Annex I of the EU Habitats Directive.**

PBF: No habitats qualify as PBF (Pannonic salt steppes and salt marshes already qualify as CH).

⁷ Wildlife Management Consulting srl, 2021. *Final report on the potential impact of the implementation of the "Grăniceri-Pilu Photovoltaic Park" project on biodiversity*. Final, July 2021. [Machine Translated from Romanian to English using Google Translate™].

3.7 Priority Species: Threatened Species

The list of candidate species screening into the CHA was subject to further assessment against the criteria and thresholds for CH identification/determination. A total of 33 candidate species that may qualify as CH were subjected to further assessment. For PBF, a significantly larger number of species (137) qualify.

Note that the following abbreviations are used through the CHA for species threat status aligned with the IUCN:

- CR = Critically Endangered
- EN = Endangered
- VU = Vulnerable
- NT = Near Threatened
- DD = Data Deficient
- LC = Least Concern
- N.A.= Not Assessed / Not Evaluated

Species listed in Annex II of the EU Habitats Directive

Whilst several species screened for the Project are listed as regionally protected in Europe in terms of Annex II of the EU Habitat Directive, only one is considered a “priority species” in terms of Annex II listing, that being the CR European Mink (*Mustela lutreola*) and this species was screened out of the CHA on the basis of it being regionally extinct. Therefore, there are no species for the Project and EAAA that could qualify as CH in terms of criterion 2 (a) “EAAA supports species listed in Annex II of Habitats Directive marked as “priority species”.

Globally threatened species

For criterion 2, several globally threatened species were considered as part of the more detailed analysis against the criterion thresholds, including birds, invertebrates, mammals and plants. Several were recorded during field surveys and others are known from the EAAA as they are conserved in the corresponding Natura 2000 site(s). These are indicated in **Table 8** by an asterisk * (field records) and ^N for Natura 2000 qualifying/conserved species. A couple were screened into the assessment at a desktop-level based on their potential to occur in the EAAA based on IBAT/IUCN data.

In terms of globally threatened (CR, EN, VU) species, available population data (minimum size) for the Natura 2000 site/KBA/IBA (which essentially forms the EAAA for the Project) was compared against available data concerning minimum global population estimates to provide an indication of the percentage of the global population potentially supported by the EAAA to compare against CH criteria threshold for criterion 2 (b) “EAAA supports $\geq 0.5\%$ of the global population AND ≥ 5 reproductive units of a CR or EN species, or EAAA supports globally significant population of VU species necessary to prevent a change of IUCN Red List status to EN or CR”. In the absence of available or reliable population data for species, area/extent was used as a proxy, with the extent of the EAAA (469.4 km²) compared against the estimated global Extent of Occurrence (EoO) based on available estimated from IUCN/BirdLife data.

The results are shown below in **Table 8**. What this proxy analysis suggests is that whilst for several species the number of reproductive units (e.g. breeding pairs) would likely meet the “ ≥ 5 reproductive units” threshold, the “ $\geq 0.5\%$ of the global population” threshold would not be exceeded in all instances where data was available for analysis, with the analysis indicating percentage values between 0.002 – 0.2% of the global population (or occurrence extent based on using EAAA extent as a proxy measures against the species EoO). Both parts of the EBRD criterion 2 (b) threshold (global population and number of reproductive units) need to be met for the species to qualify as CH, therefore none of the species assessed are considered to qualify as CH based on this global criterion. Also, the populations within the EAAA are unlikely to be of a significant enough size to affect a change in threat status from VU to EN/CR status.

For plant species, where data concerning population size and EoO were generally not available, an analysis is not possible. However, these species are typically widely distributed globally and throughout Europe (large EoO’s possible) based on

information from the IUCN database, so a very rudimentary qualitative assessment would probably indicate that the EAAA would not qualify as CH for these species, especially since optimal habitats supporting this flora are not extensive within the EAAA.

TABLE 8 CH ANALYSIS FOR GLOBALLY THREATENED SPECIES

Species Name	Common Name	Global Threat Status (IUCN)	Global minimum population size estimate (IUCN)	Local population estimate for EAAA (Natura 2000 / IBA)	EAAA population as percentage of global population	Global estimated Extent of Occurrence (EoO) in km ² (IUCN)	EAAA extent as percentage of global EoO
Birds							
<i>Acrocephalus paludicola</i>	Aquatic Warbler	VU	18,300	No data	-	580,000	0.090 %
<i>Anser erythropus</i> *	Lesser White-fronted Goose	VU	24,000	No data	*	7,060,000	0.007 %
<i>Aquila heliaca</i> * ^N	Eastern Imperial Eagle	VU	16,000	1	0.006 %	12,700,000	0.004 %
<i>Aythya ferina</i> ^N	Common Pochard	VU	760,000	2000	0.263 %	5,950,000	0.008 %
<i>Calidris falcinellus</i>	Broad-billed Sandpiper	VU	96,000	No data	-	6,100,000	0.008 %
<i>Calidris ferruginea</i>	Curlew Sandpiper	VU	420,000	No data	-	3,000,000	0.016 %
<i>Falco cherrug</i> * ^N	Saker Falcon	EN	12,200	2	0.0164 %	19,100,000	0.002 %
<i>Falco vespertinus</i> *	Red-footed Falcon	VU	287,500	200	0.069 %	3,360,000	0.014 %
<i>Pluvialis squatarola</i>	Grey Plover	VU	1,000,000	2000	0.200 %	19,000,000	0.002 %
Invertebrates							
<i>Euglesa pseudosphaerium</i>	False-orb Pea Mussel	VU	No data	No data	-	3,508,517	0.013 %
<i>Leptophyes discoidalis</i>	Blackwing Speckled Bush-cricket	VU	No data	No data	-	288,382	0.160 %
<i>Nomada errans</i>	Zwartbuikwespbij	EN	No data	No data	-	5,200,000	0.009 %
Mammals							
<i>Cricetus cricetus</i>	Common Hamster	CR	No data	No data	-	8,426,035	0.006 %
<i>Miniopterus schreibersii</i> *	Schreiber's Bent-winged Bat	VU	No data	No data	-	19,946,710	0.002 %
<i>Spermophilus citellus</i> * ^N	European Ground Squirrel	EN	No data	80	-	No data	-
Plants / Fungi							
<i>Bovista paludosa</i>	Fen Puffball	VU	No data	No data	-	No data	-
<i>Hygrocybe aurantiosplendens</i>	Orange Waxcap	VU	No data	No data	-	No data	-
<i>Picipes rhizophilus</i>	Steppengras-Schwarzfußporlin	VU	No data	No data	-	No data	-

*Species were recorded during field surveys of the Project area as part of the baseline

^NSpecies occurring in the EAAA that are conserved in the corresponding Natura 2000 site

Source of information/data: TLCommunications, based on species screening informed by IBAT and IUCN database, species information and population data from the Natura 2000 factsheet, IBA database (BirdLife) or Romania Red Data List of Birds (2022)

European Ground Squirrel

For the globally and regionally endangered European Ground Squirrel (*Spermophilus citellus*), a separate analysis has been undertaken given the absence of global population or extent data on the IUCN database covering this species.

S. citellus occurs across central and south-eastern Europe, with its distributional range divided by the Carpathian mountains. The species distribution in Romania is concentrated mainly in the south, east, north-east and in the north-west along the border with Hungary (species range extends across much of the adjacent Hungarian territory). The species is currently in serious decline, including in Romania, due to habitat destruction and fragmentation due to its very specific habitat requirements that include short-grass steppe and similar artificial habitats, such as pastures, lawns and golf courses. Roadsides and riverbanks are very important habitats, where they are the last remaining grassland habitats, and it generally avoids cultivated land (however, there are examples known from projects in the region of where this highly adaptive species has developed colonies in modified habitats within or adjacent to arable lands).

An estimate of the global range extent is roughly 432,583 km², such that at the level of the EAAA (using extent as a proxy), even if the entire EAAA was considered as potentially supporting this species (469.4 km²), this would account for around 0.1% of the global range. Furthermore, given that *S. citellus* is known to also utilize similar artificial habitats to natural steppe (e.g. meadows, pastures, lawns, etc.), the actual habitat for this species is likely to be larger than simply the steppic habitat extent within central and south-eastern Europe's Natura 2000 sites, such that any small fragmented patches of drier grassland at the Project site (where this species was observed) are considered unlikely to qualify as critical habitat. Finally, the species has been shown to be highly adaptable, even utilizing low-intensity agricultural lands and modified habitats where the original steppe grassland has been transformed, such that the actual habitat for this species may be extended beyond only natural steppe. On this basis, according to EBRD criterion 2b (exceeding 0.5% of global population), it is unlikely that the EAAA qualifies as critical habitat for *S. citellus* for this globally EN species. Further discussion on the regional/European context for this species is also included below.

Regionally CR/EN species

For CR/EN species at the regional level (Europe) and/or listed as such in terms of the Romania RDL/Red Data Book, an assessment was undertaken against CH criteria threshold for criterion 2 (c) "EAAA for important concentrations of species with national or regional status of EN or CR" and this was accomplished by comparing the local population sizes (or extent of the EAAA against the regional/national EoO) based on data available for Europe/Romania, in a similar fashion to what was done for the globally threatened species above. The analysis results are indicated below in **Table 9** at the regional level (Europe) and suggests a similar outputs to the global assessment, with the percentage values for the EAAA contribution to regional populations being between 0.01 – 0.2% (or using EAAA extent as a proxy measures against the species EoO). This is considered to be a small proportion of the regional population of these CR/EN species and is not considered to be an important concentration of these species.

TABLE 9 CH ANALYSIS FOR REGIONALLY CR/EN SPECIES

Species Name	Common Name	Regional Threat Status for Europe (IUCN)	European minimum population size estimate (IUCN)	Local population estimate for EAAA (Natura 2000 / IBA)	EAAA population as percentage of regional population	European estimated Extent of Occurrence (EoO) in km ² (IUCN)	EAAA extent as percentage of regional EoO
Birds							
<i>Falco cherrug</i> * ^N	Saker Falcon	EN	860	2	0.23 %	1,970,000	0.02 %
Invertebrates							
<i>Nomada errans</i>	Zwartbuikwespbij	EN	No data	No data	-	4,685,629	0.01 %
Mammals							

Species Name	Common Name	Regional Threat Status for Europe (IUCN)	European minimum population size estimate (IUCN)	Local population estimate for EAAA (Natura 2000 / IBA)	EAAA population as percentage of regional population	European estimated Extent of Occurrence (EoO) in km ² (IUCN)	EAAA extent as percentage of regional EoO
<i>Cricetus cricetus</i>	Common Hamster	CR	No data	No data	-	1,821,801	0.03 %
<i>Mustela eversmanii</i> ^N	Steppe Polecat	EN	2000	2	0.1 %	No data	-
<i>Spermophilus citellus</i> ^{*N}	European Ground Squirrel	EN	No data	80	-	No data	-

*Species were recorded during field surveys of the Project area as part of the baseline

^NSpecies occurring in the EAAA that are conserved in the corresponding Natura 2000 site

Source of information/data: TLCommunications, based on species screening informed by IBAT and IUCN database, species information and population data from the Natura 2000 factsheet, IBA database (BirdLife) or Romania Red Data List of Birds (2022)

European Ground Squirrel

For the globally and regionally endangered European Ground Squirrel (*Spermophilus citellus*), the approach taken for the assessment at the global level (above) is considered also appropriate for the assessment at the regional / European level. There is limited information on the regional and national populations of *S. citellus*, even from IUCN, with only a few dated Romanian studies (e.g. Baltag *et al.*, 2014), which makes it inherently difficult to evaluate the potential significance of the site in terms of regionally/nationally significant populations. At the regional level, there are 15,858 km² of Pannonian steppe (shared between four countries), and 7,210 km² of Steppic habitat which is all contained within Romania (European Commission, 2009). This amounts to a total of ~23,000 km² of optimal/suitable steppic habitat for supporting this species. In the context of the EAAA, even if the entire EAAA was considered as potentially supporting this species (469.4 km²), this would account for around 2% of the European range, but in reality this will be far less as the EAAA comprises well below 50% of optimal steppe grassland for this species, with most of the abundant salt-steppe/marsh probably being too wet for this species to colonize these sites (*based on recent Project experience in Romania and Hungary, the species avoids wet/marshy areas which are difficult to construct burrows and favors adjacent drier steppe in raised areas where the water table is lower as well as artificial habitats along roads and associated with quarries and disused borrow pits, for example*). The reality is that the optimal habitat for *S. citellus* within the EAAA is likely to be well below 1 % of the EU extent for this species (also with only 80 individuals estimated for the Natura 2000 site which translates to the EAAA for the Project, and only a small number recorded during field surveys along the outer perimeter of the Project footprint), which should not be considered regionally significant and would not qualify the species as CH in terms of criterion 2 (c) at the regional level.

Nationally CR/EN species

At the national level, there is very little data available to make an informed analysis, apart from population estimates for several bird species from the Romanian Red Book of Birds (2022). This indicates typically that the concentrations of CR/EN species are unlikely to be significant, with the exception being Eastern Imperial Eagle, *Aquila heliaca* (one individual for the EAAA could account for an estimated 20% of the national population based on available population data from the Red Book of Birds for Romania, 2022). However, to put this into context, according to recent reports from the national bird conservation organization and NGO 'Milvus Group' in Romania from 2024⁸, the number of nesting eagles in Romania has been on the increase lately, with nine territories identified in the north-western parts of the country occupied by the species and with several successful breeding pairs identified (increase from three occupied territories identified in previous years), with over 220 nesting pairs in adjacent Hungary, with the large numbers of pairs due to conservation programs implemented over the

⁸ Source of information: <https://milvus.ro/en/the-number-of-nesting-eastern-imperial-eagles-is-rising-in-romania/>

last ~20 years and mainly in Hungary. This suggests that there are likely to be far more than the five individuals reported nationally according to the Red Data Book of Birds for Romania (2022), and the 20 % estimate is likely to be a gross over-estimate. Given this additional context, it is considered unlikely that a single record of this species would qualify the EAAA as CH at the national level.

TABLE 10 CH ANALYSIS FOR NATIONALLY CR/EN SPECIES

Species Name	Common Name	National RDL/Red Book Status (Romania)	National minimum population estimate	Local population estimate for EAAA (Natura 2000 / IBA)	EAAA population as percentage of national population	National estimated Extent of Occurrence (EoO) (IUCN)	EAAA extent as percentage of national EoO
Birds							
<i>Acrocephalus paludicola</i>	Aquatic Warbler	CR	No data	No data	-	No data	-
<i>Anser erythropus</i> *	Lesser White-fronted Goose	EN	21	No data	-	No data	-
<i>Aquila heliaca</i> * ^N	Eastern Imperial Eagle	EN	5	1	20 %	No data	-
<i>Aythya nyroca</i>	Ferruginous Duck	EN	10,000	70	0.7 %	No data	-
<i>Circus macrourus</i>	Pallid Harrier	EN	400	No data	-	No data	-
<i>Falco cherrug</i> * ^N	Saker Falcon	EN	50	2	4 %	No data	-
Invertebrates							
<i>Anisus vorticulus</i>	Lesser Ramshorn Snail	EN	No data	No data	-	No data	-
Mammals							
<i>Cricetus cricetus</i>	Common Hamster	EN	No data	No data	-	No data	-
<i>Miniopterus schreibersii</i> *	Schreiber's Bent-winged Bat	CR	No data	No data	-	No data	-
<i>Myotis dasycneme</i>	Pond Bat	EN	No data	No data	-	No data	-
Plants / Fungi							
<i>Bovista paludosa</i>	Fen Puffball	EN	No data	No data	-	No data	-
<i>Elatine alsinastrum</i>		CR	No data	No data	-	No data	-
<i>Galeopsis segetum</i>	Downy Hemp-nettle	EN	No data	No data	-	No data	-
<i>Gastrosporium simplex</i>	Steppentrüffel	EN	No data	No data	-	No data	-
<i>Marsilea quadrifolia</i> ^N	Water Shamrock	EN	No data	5,000	-	No data	-
<i>Tozzia carpathica</i>	Carpathian Tozzia	EN	No data	No data	-	No data	-
<i>Utricularia breinii</i>	New Forest Bladderwort	CR	No data	No data	-	No data	-

*Species were recorded during field surveys of the Project area as part of the baseline

^NSpecies occurring in the EAAA that are conserved in the corresponding Natura 2000 site

Source of information/data: TLCommunications, based on species screening informed by IBAT and IUCN database, species information and population data from the Natura 2000 factsheet, IBA database (BirdLife) or Romania Red Data List of Birds (2022)

For other species, there is insufficient data on population sizes or distributions to enable any judgement around whether these species are present and at numbers that could qualify as CH. However, based on their broad distributional ranges according to the IUCN, these extend in most cases across the entire country (and most of Europe in several instances) such that it is considered unlikely that the EAAA would qualify as CH for these species even at the national level.

Conclusion regarding CH: None of the candidate species assessed in terms of criterion 2 (a, b, c) for threatened species at the global, regional and national level were found to qualify as CH.

PBF: Under criterion 2 (a, b, c) species occurring in the area of impact (AoI) that are listed in Annex II of the EU Habitats Directive, Annex I of the EU Birds Directive, IUCN globally threatened species (CR, EN, VU) and nationally/regionally CR/EN species qualify as PBF. This includes a total of 77 species, with the majority being birds (51 species) as well as plants (10), amphibians (4), reptiles (1), mammals (6) and invertebrates (5).

See the screening table with the complete list of PBF species identified for the Project in **Annexure B** (Section 7.1).

3.8 Priority Species: Endemic and Restricted-range Species

Whilst the initial list of species screening for the CHA included several (five in total) invertebrate species that are endemic to Romania and also qualify as restricted-range species⁹, none of these were considered potentially occurring in the CHA study area and EAAA, based on their restricted distribution ranges and unique habitat requirements (e.g. montane springs, underground areas) which are not supported:

Conclusion regarding CH and PBF: Criterion 3 and the thresholds relevant to endemics/restricted-range species do not apply as endemics/RR species are absent from the study area and EAAA.

3.9 Priority Species: Migratory and Congregatory Species

The reptiles, amphibians and invertebrate species considered as candidate species in the CHA are not migratory or congregatory species. In terms of mammals, there are no known significant concentrations or land mammals (such as bears, wolves, etc.) with large ranges that migrate over large areas identified for the CHA study area and EAAA. The exception is the two species of bats recorded during field surveys that are migratory and congregatory, including *Eptesicus serotinus* and *Miniopterus schreibersii*.

The large majority of migratory and congregatory species considered in the assessment are the candidate bird species, which includes numerous waterbird species that could qualify as CH under this criterion. The majority are species of global/regional or national Least Concern (LC) with large populations at the global level and which are highly unlikely to meet or exceed the thresholds set in terms of percentage of the global population (several species were checked and the contribution of the EAAA for supporting global populations of species of LC, based on population estimates from the Natura 2000 site/IBA/KBA is generally considered to be well below 1% and insignificant at the global level).

Therefore, species of LC with large global populations and extensive ranges were excluded from further analysis under this criterion, with the focus shifting to the globally/regionally threatened species (CR, EN, VU), which considered the bird and bat species listed in **Table 11** below. This was informed by the estimated contribution of the EAAA towards global population minimum estimates, as per the results presented in **Table 9**, which were compared against a 1% global migratory population threshold. This suggests that for all bird species and the single bat considered, the contribution of the EAAA towards supporting global migratory populations is well below 1% and therefore it is unlikely to qualify any species as CH under criterion 4 (a) "EAAA sustains, on a cyclical or otherwise regular basis, ≥ 1 percent of the global population at any point of the

⁹ Endemic and restricted-range invertebrates screened-out of the CHA include: *Bythiospeum leruthi*, *Bythiospeum transsylvanicum*, *Cheilosia griseifacies*, *Cochlodina marisi*, *Melanopsis parreyssii*.

species' lifecycle" or criterion 4 (b) "EAAA predictably supports ≥ 10 percent of global population during periods of environmental stress".

TABLE 11 CH ANALYSIS FOR GLOBALLY THREATENED MIGRATORY/CONGREGATORY SPECIES

Species Name	Common Name	Regional Threat Status for Europe (IUCN)	Potential contribution of EAAA to global population (from Table 9)	1% global threshold population exceeded?
Birds				
<i>Acrocephalus paludicola</i>	Aquatic Warbler	VU	0.09 %	No
<i>Anser erythropus</i> * ^N	Lesser White-fronted Goose	VU	0.007 %	No
<i>Aquila heliaca</i> * ^N	Eastern Imperial Eagle	VU	0.006 %	No
<i>Aythya ferina</i> ^N	Common Pochard	VU	0.26 %	No
<i>Calidris falcinellus</i>	Broad-billed Sandpiper	VU	0.008 %	No
<i>Calidris ferruginea</i>	Curlew Sandpiper	VU	0.016 %	No
<i>Falco cherrug</i> * ^N	Saker Falcon	EN	0.002 %	No
<i>Falco vespertinus</i> *	Red-footed Falcon	VU	0.069 %	No
<i>Pluvialis squatarola</i>	Grey Plover	VU	0.2 %	No
Bats				
<i>Miniopterus schreibersii</i> *	Schreiber's Bent-winged Bat	VU	0.002 %	No

*Species were recorded during field surveys of the Project area as part of the baseline

^NSpecies occurring in the EAAA that are conserved in the corresponding Natura 2000 site

Source of information/data: TLCommunications, based on species screening informed by IBAT and IUCN database, Natura 2000 factsheet, IBA database (BirdLife)

Conclusion regarding CH: None of the migratory bird and bat species considered in the assessment are considered to qualify as CH, with global thresholds not being met or exceeded.

PBF: All candidate migratory species of bats and birds in the CHA study area (area of impact, Aol) would qualify as PBF, and this includes a total of 110 species, the two bat species, *Eptesicus serotinus* and *Miniopterus schreibersii* as well as 108 bird species.

Note that many of these species are also threatened/protected species that qualify as PBF under criterion 2 (section 3.3.2) and are therefore not necessarily additional PBFs to those in section 3.3.2 but already qualify under criterion 2 (50 species), The balance (60 species) are not threatened/protected but qualify as PBF purely based on their migratory status.

This brings the total number of PBF identified for the Project to 137 species. These are listed in the summary contained in Chapter 4. 86 species were confirmed through field surveys (36 of these being species conserved within the Natura 2000 site), with an additional 30 species occurring within the EAAA based on data for the corresponding Natura 2000 site (qualifying species) but which were not confirmed by field surveys. The balance of 21 species could potentially occur based on the species screening but were not confirmed through field surveys of the Project, and precautionarily these have also been included as PBF.

See the screening table with the complete list of PBF species identified for the Project in **Annexure B** (Section 7.1).

3.10 Key Evolutionary Processes

Values considered relate to the landscape, ecosystems and habitats supporting

- high levels of species/genetic diversity;
- unique species assemblages/plant communities;
- important wildlife/species corridors; and
- climate adaptation.

CH is not triggered as the study area and EAAA is not considered to be of particularly high value in terms of scientific/research value or in terms of supporting key evolutionary processes. The landscape is not considered to support particularly high levels of species diversity. Important ecotones and unique assemblages of plant and animal species have not been identified, nor are there important corridors identified for fauna (not a key migratory flyway or route for birds, not identified as an important macro-ecological corridor for mammals such as bears/wolves that have large ranges and migrate over large distances). The site is also not considered to be of particular importance in terms of climate adaptation.

of critical habitat. These are shown on the map in **Error! Reference source not found..**

Conclusion regarding CH:

Project does not qualify as CH in terms of this criterion concerning key evolutionary processes.

PBF: Not applicable to this criterion.

4. Summary of the CHA

4.1 CH

Habitats

The Project qualifies as CH in terms only of a single physical habitat type, that being **Pannonic salt steppes and salt marshes (code 1530*)** which qualifies as CH given its regionally EN threat status and most importantly, listing as a ‘priority habitat’ in Annex I of the EU Habitats Directive, thus qualifying in terms of criterion 1 (a) of the EBRD criteria. Following a field survey in 2024 (by the consulting firm: Wilderness Research and Consultancy) the location and extent of CH pertaining to the Pannonic salt steppes and salt marshes type was further ground-truthed, examined and the boundaries of patches representative of this habitat type were described and mapped to inform the CHA and development planning/layout revisions.

Species

Following the screening and assessment of numerous species of flora and fauna, none were found to meet or exceed the thresholds of the qualifying criteria in terms of priority species (i.e. threatened/protected species at global/regional/national levels, endemic/restricted-range species and migratory/congregatory species). No endemic or restricted-range species were identified for the EAAA and Project area.

4.2 PBF

Habitats

No additional physical habitats qualify as PBF, with the Pannonic salt steppes and salt marshes already being CH.

Species

Numerous species of flora and fauna were identified as PBF for the Project, qualifying under multiple criteria including those related to priority species (i.e. threatened/protected species at global/regional/national levels and migratory species of birds and bats typically). A combined total of 137 species qualify as PBF, including (see **Table 12** below):

- 110 bird species
- 4 amphibians
- 1 reptile
- 7 mammals
- 5 invertebrates
- 10 plants

Of the 137 species, 86 species (~62%) were recorded at the Project site during field surveys in 2021, with a further 30 species (additional 21%) being conserved within the overlapping Natura 2000 site and assumed to be relevant to the Project given their occurrence within the EAAA and with suitable habitat in the Project area and AoI for supporting these species. Thus, a total of 116 species (of the 137 or 85% of the PBF species) are likely to be present in the AoI and could be impacted by the Project. For the remaining species of PBF identified (15% or 21 species), these could potentially be present based on the datasets considered in the CHA species screening process, but not confirmed, and in the face of scientific uncertainty regarding the presence of these species, the ‘precautionary principle’ has been applied and a risk-averse approach considered that includes these as PBF, conservatively and precautionary.

TABLE 12 LIST OF PBF SPECIES FOR THE PROJECT

Scientific Name	Common Name	Status of Natura 2000 conserved species	Field confirmed?
Herpetofauna (amphibians, reptiles)			
<i>Bombina bombina</i>	European fire-bellied toad		Yes
<i>Pelobates fuscus</i>	Common Spadefoot		Yes
<i>Triturus cristatus</i>	Great Crested Newt		No
<i>Triturus dobrogicus</i>	Danube Crested Newt		No
<i>Emys orbicularis</i>	European Pond Turtle		Yes
Birds			
<i>Accipiter nisus</i>	Eurasian Sparrowhawk		Yes
<i>Acrocephalus arundinaceus</i>	Great Reed-warbler		Yes
<i>Acrocephalus melanopogon</i>	Moustached Warbler	Breeding	No
<i>Acrocephalus paludicola</i>	Aquatic Warbler		No
<i>Acrocephalus schoenobaenus</i>	Sedge Warbler		Yes
<i>Acrocephalus scirpaceus</i>	Common Reed-warbler		Yes
<i>Alauda arvensis</i>	Eurasian Skylark		Yes
<i>Alcedo atthis</i>	Common Kingfisher	Breeding	Yes
<i>Anas acuta</i>	Northern Pintail	Concentration	Yes
<i>Anas clypeata</i>	Northern Shoveler	Concentration	No
<i>Anas crecca</i>	Common Teal	Concentration	Yes
<i>Anas penelope</i>	Eurasian Wigeon	Concentration	No
<i>Anas platyrhynchos</i>	Mallard	Concentration	Yes
<i>Anas querquedula</i>	Garganey	Concentration	Yes
<i>Anas strepera</i>	Gadwall	Breeding, Concentration	No
<i>Anser albifrons</i>	Greater White-fronted Goose	Wintering	Yes
<i>Anser erythropus</i>	Lesser White-fronted Goose		Yes
<i>Anthus campestris</i>	Tawny Pipit	Breeding	Yes
<i>Anthus cervinus</i>	Red-Thorated Pipit		Yes
<i>Anthus pratensis</i>	Meadow Pipit		Yes
<i>Apus apus</i>	Common Swift		Yes
<i>Aquila heliaca</i>	Eastern Imperial Eagle	Concentration	Yes

Scientific Name	Common Name	Status of Natura 2000 conserved species	Field confirmed?
<i>Ardea alba</i>	Great White Egret		Yes
<i>Ardea cinerea</i>	Grey Heron	Breeding, Concentration	Yes
<i>Ardea purpurea</i>	Purple Heron	Breeding, Concentration	Yes
<i>Asio flammeus</i>	Short-eared Owl	Breeding, Wintering	No
<i>Asio otus</i>	Northern Long-Eared Owl		Yes
<i>Aythya ferina</i>	Common Pochard	Breeding, Concentration	No
<i>Aythya nyroca</i>	Ferruginous Duck	Breeding, Concentration	No
<i>Botaurus stellaris</i>	Eurasian Bittern		Yes
<i>Buteo buteo</i>	Eurasian Buzzard		Yes
<i>Buteo lagopus</i>	Rough-Legged Buzzard		Yes
<i>Calidris alpina</i>	Dunlin	Concentration	No
<i>Calidris falcinellus</i>	Broad-billed Sandpiper		No
<i>Calidris ferruginea</i>	Curlew Sandpiper		No
<i>Calidris pugnax</i>	Ruff	Concentration	No
<i>Calidris pugnax</i>	Ruff		Yes
<i>Carduelis carduelis</i>	European Goldfinch		Yes
<i>Charadrius dubius</i>	Little Ringed Plover	Breeding, Concentration	No
<i>Chlidonias hybridus</i>	Whiskered Tern	Breeding	Yes
<i>Chroicocephalus ridibundus</i>	Black-headed Gull		Yes
<i>Ciconia ciconia</i>	White Stork	Breeding	Yes
<i>Ciconia nigra</i>	Black Stork	Breeding, Concentration	Yes
<i>Circaetus gallicus</i>	Short-tailed Snake-eagle	Breeding	No
<i>Circus aeruginosus</i>	Western Marsh-Harrier	Breeding	Yes
<i>Circus cyaneus</i>	Hen Harrier		Yes
<i>Circus macrourus</i>	Pallid Harrier		No
<i>Circus pygargus</i>	Montagu's Harrier	Breeding	Yes

Scientific Name	Common Name	Status of Natura 2000 conserved species	Field confirmed?
<i>Columba palumbus</i>	Common Woodpigeon		Yes
<i>Corvus frugilegus</i>	Rook	Breeding	Yes
<i>Corvus monedula</i>	Eurasian jackdaw		Yes
<i>Coturnix coturnix</i>	Common Quail		Yes
<i>Crex crex</i>	Corncrake	Breeding	No
<i>Cuculus canorus</i>	Common Cuckoo		Yes
<i>Cygnus olor</i>	Mute Swan		Yes
<i>Delichon urbicum</i>	Northern House Martin		Yes
<i>Egretta alba</i>	Great White Egret	Concentration	No
<i>Egretta garzetta</i>	Little Egret	Breeding	Yes
<i>Emberiza schoeniclus</i>	Reed Bunting		Yes
<i>Falco cherrug</i>	Saker Falcon	Concentration	Yes
<i>Falco columbarius</i>	Merlin	Wintering	No
<i>Falco peregrinus</i>	Peregrine Falcon	Wintering	Yes
<i>Falco tinnunculus</i>	Common Kestrel	Wintering	Yes
<i>Falco vespertinus</i>	Red-footed Falcon		Yes
<i>Fulica atra</i>	Common Coot	Breeding, Concentration	Yes
<i>Gallinago gallinago</i>	Common Snipe	Breeding, Concentration	Yes
<i>Gallinula chloropus</i>	Common Moorhen		Yes
<i>Grus grus</i>	Common Crane		Yes
<i>Haliaeetus albicilla</i>	White-tailed Sea-eagle	Resident, Wintering	Yes
<i>Himantopus himantopus</i>	Black-winged Stilt	Breeding	Yes
<i>Hirundo rustica</i>	Barn Swallow		Yes
<i>Ixobrychus minutus</i>	Common Little Bittern	Breeding	No
<i>Lanius minor</i>	Lesser Grey Shrike	Breeding	No
<i>Larus cachinnans/michahellis</i>	Caspian Gull		Yes
<i>Larus ridibundus</i>	Black-headed Gull	Concentration	No
<i>Limosa limosa</i>	Black-Tailed Godwit	Breeding, Concentration	Yes

Scientific Name	Common Name	Status of Natura 2000 conserved species	Field confirmed?
<i>Locustella fluviatilis</i>	River Warbler	Breeding	No
<i>Locustella luscinioides</i>	Savi's Warbler		Yes
<i>Locustella naevia</i>	Common Grasshopper-warbler	Breeding	No
<i>Luscinia megarhynchos</i>	Common Nightingale		Yes
<i>Luscinia svecica</i>	Bluethroat	Breeding	No
<i>Mareca penelope</i>	Eurasian Wigeon		Yes
<i>Merops apiaster</i>	Eurasian Bee-eater		Yes
<i>Milvus migrans</i>	Black Kite	Breeding	No
<i>Motacilla alba</i>	White Wagtail		Yes
<i>Motacilla flava</i>	Western Yellow Wagtail		Yes
<i>Numenius arquata</i>	Eurasian Curlew	Concentration	Yes
<i>Numenius phaeopus</i>	Whimbrel	Concentration	No
<i>Nycticorax nycticorax</i>	Black-crowned Night-heron	Breeding	Yes
<i>Oenanthe oenanthe</i>	Northern Wheatear		Yes
<i>Pandion haliaetus</i>	Osprey	Concentration	No
<i>Pernis apivorus</i>	Eurasian Honey-buzzard		Yes
<i>Phoenicurus ochruros</i>	Black Redstart		Yes
<i>Platalea leucorodia</i>	Eurasian Spoonbill	Breeding, Concentration	Yes
<i>Pluvialis apricaria</i>	Eurasian Golder Plover	Concentration	Yes
<i>Pluvialis squatarola</i>	Grey Plover		No
<i>Recurvirostra avosetta</i>	Pied Avocet	Breeding, Concentration	Yes
<i>Riparia riparia</i>	Collared Sand Martin		Yes
<i>Spatula clypeata</i>	Northern Shoveler		Yes
<i>Sterna hirundo</i>	Common Tern	Breeding, Concentration	No
<i>Sylvia nisoria</i>	Barred Warbler	Breeding	No
<i>Tachybaptus ruficollis</i>	Little Grebe	Breeding, Concentration	Yes
<i>Tadorna tadorna</i>	Common Shelduck		Yes
<i>Tringa erythropus</i>	Spotted Redshank	Concentration	No
<i>Tringa totanus</i>	Common Redshank	Concentration	Yes

Scientific Name	Common Name	Status of Natura 2000 conserved species	Field confirmed?
<i>Troglodytes troglodytes</i>	Northern Wren		Yes
<i>Turdus iliacus</i>	Redwing		No
<i>Turdus pilaris</i>	Fieldfare		Yes
<i>Upupa epops</i>	Common Hoopoe		Yes
<i>Vanellus vanellus</i>	Northern Lapwing	Breeding, Concentration	Yes
Invertebrates			
<i>Anisus vorticulus</i>	Lesser Ramshorn Snail		No
<i>Euglesa pseudosphaerium</i>	False-orb Pea Mussel		No
<i>Leptophyes discoidalis</i>	Blackwing Speckled Bush-cricket		No
<i>Lycaena dispar</i>	Large Copper		Yes
<i>Nomada errans</i>	Zwartbuikwespij		No
Mammals			
<i>Cricetus cricetus</i>	Common Hamster		No
<i>Eptesicus serotinus</i>	Eurasian Serotine		Yes
<i>Lutra lutra</i>	Eurasian Otter		Yes
<i>Miniopterus schreibersii</i>	Schreiber's Bent-winged Bat		Yes
<i>Mustela eversmanii</i>	Steppe Polecat		No
<i>Myotis dasycneme</i>	Pond Bat		No
<i>Spermophilus citellus</i>	European Ground Squirrel		Yes
Plants			
<i>Alisma gramineum</i>	Ribbon-leaved Water-plantain		No
<i>Bovista paludosa</i>	Fen Puffball		No
<i>Cirsium brachycephalum</i>			No
<i>Elatine alsinastrum</i>			No
<i>Galeopsis segetum</i>	Downy Hemp-nettle		No
<i>Gastrosporium simplex</i>	Steppentrüffel		No
<i>Hygrocybe aurantiosplendens</i>	Orange Waxcap		No
<i>Marsilea quadrifolia</i>	Water Shamrock		No
<i>Picipes rhizophilus</i>	Steppengras-Schwarzfußporlin		No
<i>Tozzia carpathica</i>	Carpathian Tozzia		No

5. Implications for the Project

The ESIA considers the possibility of the Project impacting on the CH and PBF values identified, as part of the Biodiversity Impact Assessment, and considers viable options for avoidance and minimization of impacts, aligned with the mitigation hierarchy, before considering restoration or compensation measures such as biodiversity offsets.

5.1 Requirements for CH

Critical habitat is triggered only for the priority habitat type 'Pannonic salt steppes and salt marshes' (code 1530*). Species of flora/fauna were found not to qualify for CH (but do qualify as PBF – see below).

For the CH qualifying physical habitat type, the Project will need to align with the Project applicable standards (EBRD ESR 6 and IFC PS 6) pertaining to the management and mitigation of impacts on CH. These vary slightly depending on the IFI (EBRD vs IFC) and the requirements as per the relevant lender's standards/performance requirement are contained in Annexure C (Section 7.3) at the back of this CHA report. Generally, there is considerable overlap between the EBRD and IFC, such that the following typically applies to the Project:

- Consideration of Project alternatives located in habitats of lesser biodiversity value (modified or natural habitats that are not CH) where feasible, aligned with the mitigation hierarchy (avoidance first, then consider minimization);
- The Project needs to show that it does not lead to measurable adverse impacts on CH values;
- The Project needs to show that it does not lead to a net reduction in the global/regional/national population of any CR/EN species;
- The Project must align with the mitigation hierarchy, with a focus on avoiding and minimizing impacts before considering restoration and offset options;
- The mitigation strategy for the Project must be described in a Biodiversity Action Plan (BAP) and/or Biodiversity Management Plan (BMP) as relevant to Project impacts on CH (where identified);
- The Project must be designed, constructed and implemented/operated to achieve positive conservation outcomes (i.e. Net Gain (NG) / Net Positive Impact in terms of biodiversity) for the relevant CH values;
- A robust, long-term biodiversity monitoring and evaluation program (BMEP) with a focus on CH values must be integrated into the Project's adaptive management program;
- Relevant stakeholders are to be consulted; and
- The Project is to be permitted under applicable environmental laws.

It should be noted here that a BAP and construction-phase BMP have already been developed for the Project, based on the outcomes of the previous CHA report dated 2024 (now redundant). Ideally, these should be reviewed and updated to reflect any changes in the current version of the CHA (2026); however since the findings concerning CH have not changed, this requirement is not considered necessary.

Also, following on from the field verification and refinement of the extent/boundary of mapped CH (Pannonic salt steppes and salt marshes) by Wilderness Research and Consultancy and ER in 2024, the Client has revised the development layout to exclude development within the CH areas for the solar PV arrays portion of the development, aligned with the IFC/EBRD requirements mentioned above considering avoidance. The underground transmission line will still be located in portions of CH but since this will be buried there are opportunities to reinstate/restore and even potentially improve the status of these

habitats post-construction, towards meeting a NG requirement. According to the BAP (The Biodiversity Company, 2025), the Project is also considering implementing a biodiversity offset and range of conservation measures and interventions aimed at achieving NG for CH concerned. The details are outlined further in the BAP, BMP and Biodiversity Impact Assessment (BIA) report for the Project, which are also in the process of being updated/ revised to different extents at the time of writing this CHA report.

5.2 Requirements for PBF

For PBF values (flora and fauna species) identified for the Project, the requirements of EBRD ESR6 are relevant and include:

- Consideration of Project alternatives where feasible, aligned with the mitigation hierarchy;
- The Project must implement the mitigation hierarchy to ensure at least No Net Loss (NNL) and preferably Net Gain (NG) of PBFs;
- Relevant stakeholders are to be consulted; and
- The Project is permitted under applicable environmental laws.

Most important is the NNL strategy for PBF values, which has also been addressed in the BAP already developed for the Project, which outlines the overall strategy and approach towards meeting at least NNL (preferably NG) for PBF together with a suite of actionable interventions and species conservation actions. Since the update to the CHA (this assessment and report) has identified numerous additional species that also qualify as PBF, it is recommended that the BAP be reviewed and updated to include these additional species and the strategy, approach, actions and interventions refined or revised as necessary to ensure NNL (or NG) can also be achieved practically for these additional species.

6. References

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Additional:

Romania's Red Data Book of Threatened Species (Red Book or 'Cartea Roșie a speciilor din România' in Romanian) is in the form of a multi-volume national reference, with each volume having its own formal citation, with the most widely used editions published by the Romania Academy and the Institute of Biology in Bucharest. These are as follows:

- *Red Data Book of Birds*: Munteanu, D., Papadopol, A., & Weber, P., 2002 *Cartea Roșie a Aveselor din România*. Editura Muzeului Național de Istorie Naturală "Grigore Antipa", București.
- *Red Data Book of Vertebrates*: Botnariuc, N. & Tatole, V. (eds.) 2005. *Cartea Roșie a Vertebratelor din România*. Editura Academiei Române, București.
- *Red Data Book of Invertebrates*: Various authors, Romanian Academy series (multiple volumes, 1994–2000). *Cartea Roșie a Nevertebratelor din România*. Editura Academiei Române, București.
- *Red Data Book of Vascular Plants*: Dihoru, G. & Negrean, G. 2009. *Cartea Roșie a Plantelor Vasculare din România*. Editura Academiei Române, București.
- *Red Data Book of Plants*: Anastasiu, P., Sârbu, I., Oprea, A., *et al.* (eds.) 2015–2021. *Cartea Roșie a Plantelor din România*. Seria Nouă. Institutul de Biologie al Academiei Române, București.

7. Annexures

See pages that follow.

7.1 CH Species Screening Table

Key to EBRD’s CH criteria and thresholds:

2 (a)	EAAA supports species listed in Annex II of Habitats Directive marked as “priority species
2 (b)	EAAA supports ≥ 0.5% of the global population AND ≥ 5 reproductive units of a CR or EN species, or EAAA supports globally significant population of VU species necessary to prevent a change of IUCN Red List status to EN or CR
2 (c)	EAAA for important concentrations of species with national or regional status of EN or CR
3 (a)	EAAA regularly holds ≥ 10% of global population AND ≥ 10 reproductive units of the species
4 (a)	EAAA sustains, on a cyclical or otherwise regular basis, ≥ 1 percent of the global population at any point of the species’ lifecycle
4 (b)	EAAA predictably supports ≥10 percent of global population during periods of environmental stress

TABLE 13 CH SPECIES SCREENING TABLE

Scientific Name	Common Name	Type	IUCN Threat Status (global)	IUCN Threat Status (Europe)	Romanian RDL	Data Source	POC	Migratory Status	Endemic	Restricted-Range?	Congregatory?	Annex II EU Habitats Directive	Annex I EU Birds Directive	Resolution 6 of Bern Convention	CH Criteria					
															2a	2b	2c	3a	4a	4b
Birds																				
<i>Acrocephalus paludicola</i>	Aquatic Warbler	Birds	VU	VU	CR	IBAT/IUCN	Possible	Full migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6						
<i>Anser erythropus</i>	Lesser White-fronted Goose	Birds	VU	VU	EN	IBAT/IUCN	Possible	Full migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6						
<i>Aquila heliaca</i>	Eastern Imperial Eagle	Birds	VU	LC	EN	Field survey	Confirmed	Resident	No	No	Yes		Yes	Revised Annex I of Resolution 6						
<i>Aythya ferina</i>	Common Pochard	Birds	VU	VU	VU	Natura 2000	Possible	Full migrant	No	No	Yes									
<i>Aythya nyroca</i>	Ferruginous Duck	Birds	NT	LC	EN	Natura 2000	Possible	Full migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6						
<i>Calidris alpina</i>	Dunlin	Birds	NT	LC	LC	Natura 2000	Possible	Full migrant	No	No	Yes		Yes							
<i>Calidris falcinellus</i>	Broad-billed Sandpiper	Birds	VU	VU	LC		Possible	Full migrant	No	No	Yes									
<i>Calidris ferruginea</i>	Curllew Sandpiper	Birds	VU	VU	LC		Possible	Full migrant	No	No	Yes									
<i>Circus macrourus</i>	Pallid Harrier	Birds	NT	LC	EN	IBAT/IUCN	Possible	Full migrant	No	No	No		Yes	Revised Annex I of						

Scientific Name	Common Name	Type	IUCN Threat Status (global)	IUCN Threat Status (Europe)	Romanian RDL	Data Source	POC	Migration Status	Endemic	Restricted-Range?	Congregatory?	Annex II EU Habitats Directive	Annex I EU Birds Directive	Resolution 6 of Bern Convention	CH Criteria					
															2a	2b	2c	3a	4a	4b
														Resolution 6						
<i>Falco cherrug</i>	Saker Falcon	Birds	EN	EN	EN	Field survey	Confirmed	Passage migrant	No	No	No		Yes	Revised Annex I of Resolution 6						
<i>Falco vespertinus</i>	Red-footed Falcon	Birds	VU	VU	VU	Field survey	Confirmed	Full migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6						
<i>Limosa limosa</i>	Black-Tailed Godwit	Birds	NT	NT	NT	Field survey	Confirmed	Full migrant	No	No	Yes									
<i>Numenius arquata</i>	Eurasian Curlew	Birds	NT	NT	NT	Field survey	Confirmed	Passage migrant	No	No	Yes									
<i>Pluvialis squatarola</i>	Grey Plover	Birds	VU	LC	LC		Possible	Full migrant	No	No	Yes									
<i>Vanellus vanellus</i>	Northern Lapwing	Birds	NT	VU	NT	Field survey	Confirmed	Passage migrant	No	No	Yes									
Invertebrates																				
<i>Anisus vorticulus</i>	Lesser Ramshorn Snail	Invertebrates	DD	NT	EN	IBAT/IUCN	Possible	Resident	No	No	No	Annex II		Revised Annex I of Resolution 6						
<i>Euglesa pseudosphaerium</i>	False-orb Pea Mussel	Invertebrates	VU	VU	N.A.		Possible	Resident	No	No	No									
<i>Leptophyes discoidalis</i>	Blackwing Speckled Bush-cricket	Invertebrates	VU	VU	N.A.	IBAT/IUCN	Possible	Resident	No	No	No									
<i>Nomada errans</i>	Zwartbuikwespbij	Invertebrates	EN	EN	N.A.	IBAT/IUCN	Possible	Resident	No	No	No									
Mammals																				
<i>Cricetus cricetus</i>	Common Hamster	Mammals	CR	CR	CR	IBAT/IUCN	Possible	Resident	No	No	No									
<i>Miniopterus schreibersii</i>	Schreiber's Bent-winged Bat	Mammals	VU	VU	EN	Field survey	Confirmed	Full migrant	No	No	Yes	Annex II		Revised Annex I of Resolution 6						
<i>Mustela eversmanii</i>	Steppe Polecat	Mammals	LC	EN	VU	Natura 2000	Possible	Resident	No	No	No	Annex II		Revised Annex I of Resolution 6						
<i>Myotis dasycneme</i>	Pond Bat	Mammals	NT	VU	EN	IBAT/IUCN	Possible	Resident	No	No	No	Annex II		Revised Annex I of Resolution 6						
<i>Spermophilus citellus</i>	European Ground Squirrel	Mammals	EN	EN	VU	Field survey	Confirmed	Resident	No	No	No	Annex II		Revised Annex I of Resolution 6						
Flora (plants, fungi)																				

Scientific Name	Common Name	Type	IUCN Threat Status (global)	IUCN Threat Status (Europe)	Romanian RDL	Data Source	POC	Migration Status	Endemic	Restricted-Range?	Congregatory?	Annex II EU Habitats Directive	Annex I EU Birds Directive	Resolution 6 of Bern Convention	CH Criteria					
															2a	2b	2c	3a	4a	4b
<i>Alisma gramineum</i>	Ribbon-leaved Waterplantain	Plants	DD	LC	EN	IBAT/IUCN	Possible	Resident	No	No	No									
<i>Bovista paludosa</i>	Fen Puffball	Plants	VU	N.A.	EN	IBAT/IUCN	Possible	Resident	No	No	No									
<i>Elatine alsinastrum</i>		Plants	NT	NT	CR	IBAT/IUCN	Possible	Resident	No	No	No									
<i>Galeopsis segetum</i>	Downy Hemp-nettle	Plants	DD	DD	EN	IBAT/IUCN	Possible	Resident	No	No	No									
<i>Gastrosporium simplex</i>	Steppentrüffel	Plants	NT	NT	EN	IBAT/IUCN	Possible	Resident	No	No	No									
<i>Hygrocybe aurantiosplendens</i>	Orange Waxcap	Plants	VU	N.A.	VU	IBAT/IUCN	Possible	Resident	No	No	No									
<i>Marsilea quadrifolia</i>	Water Shamrock	Plants	LC	VU	EN	Natura 2000	Possible	Resident	No	No	No	Annex II		Revised Annex I of Resolution 6						
<i>Picipes rhizophilus</i>	Steppengras-Schwarzfußporlin	Plants	VU	N.A.	N.A.	IBAT/IUCN	Possible	Resident	No	No	No									
<i>Tozzia carpathica</i>	Carpathian Tozzia	Plants	DD	DD	EN	IBAT/IUCN	Possible	Resident	No	No	No	Annex II		Revised Annex I of Resolution 6						

7.2 PBF Species Screening Table

Key to EBRD's PBF criteria:

2 (a)	Species in the area of impact listed in Annex II of Habitats Directive, Annex I of Birds Directive or Resolution 6 of Bern Convention
2 (b)	Species in the area of impact with IUCN global Red List status of VU, EN or CR
2 (c)	Species in the area of impact with national or regional status of EN or CR
3 (a)	All range-restricted species in the area of impact
4 (a)	All migratory species in the area of impact

TABLE 14 PBF SPECIES SCREENING TABLE

Scientific Name	Common Name	Type	IUCN Threat Status (global)	IUCN Threat Status (Europe)	Romanian RDL	Data Source	POC	Migratory Status	Endemic	Restricted-Range?	Congregatory?	Annex II EU Habitats Directive	Annex I EU Birds Directive	Resolution 6 of Bern Convention	PBF Criteria Triggered				
															2a	2b	2c	3a	4a
Herpetofauna (amphibians & reptiles)																			
<i>Bombina bombina</i>	European fire-bellied toad	Amphibians	LC	LC	VU	Field survey	Confirmed	Resident	No	No	No	Annex II		Revised Annex I of Resolution 6					
<i>Pelobates fuscus</i>	Common Spadefoot	Amphibians	LC	LC	NT	Field survey	Confirmed	Resident	No	No	No	Annex II							
<i>Triturus cristatus</i>	Great Crested Newt	Amphibians	LC	LC	VU	Natura 2000	Possible	Resident	No	No	No	Annex II		Revised Annex I of Resolution 6					
<i>Triturus dobrogicus</i>	Danube Crested Newt	Amphibians	LC	LC	VU	IBAT/IUCN	Possible	Resident	No	No	No	Annex II		Revised Annex I of Resolution 6					
<i>Emys orbicularis</i>	European Pond Turtle	Reptiles	NT	NT	VU	Field survey	Confirmed	Resident	No	No	No	Annex II		Revised Annex I of Resolution 6					
Birds																			
<i>Accipiter nisus</i>	Eurasian Sparrowhawk	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	No								
<i>Acrocephalus arundinaceus</i>	Great Reed-warbler	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	No								
<i>Acrocephalus melanopogon</i>	Moustached Warbler	Birds	LC	LC	VU	Natura 2000	Possible	Passage migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Acrocephalus paludicola</i>	Aquatic Warbler	Birds	VU	VU	CR	IBAT/IUCN	Possible	Full migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6					
<i>Acrocephalus schoenobaenus</i>	Sedge Warbler	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	No								

Scientific Name	Common Name	Type	IUCN Threat Status (Global)	IUCN Threat Status (Europe)	Romanian RDL	Data Source	POC	Migration Status	Endemic	Restricted-Range?	Congregatory?	Annex II EU Habitats Directive	Annex I EU Birds Directive	Resolution 6 of Bern Convention	PBF Criteria Triggered				
															2a	2b	2c	3a	4a
<i>Acrocephalus scirpaceus</i>	Common Reed-warbler	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	No								
<i>Alauda arvensis</i>	Eurasian Skylark	Birds	LC	LC	NT	Field survey	Confirmed	Passage migrant	No	No	No								
<i>Alcedo atthis</i>	Common Kingfisher	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Anas acuta</i>	Northern Pintail	Birds	LC	VU	LC	Field survey	Confirmed	Full migrant	No	No	Yes								
<i>Anas clypeata</i>	Northern Shoveler	Birds	LC	LC	LC	Natura 2000	Possible	Full migrant	No	No	Yes								
<i>Anas crecca</i>	Common Teal	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	Yes								
<i>Anas penelope</i>	Eurasian Wigeon	Birds	LC	LC	LC	Natura 2000	Possible	Full migrant	No	No	Yes								
<i>Anas platyrhynchos</i>	Mallard	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	Yes								
<i>Anas querquedula</i>	Garganey	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	Yes								
<i>Anas strepera</i>	Gadwall	Birds	LC	LC	LC	Natura 2000	Possible	Full migrant	No	No	Yes								
<i>Anser albifrons</i>	Greater White-fronted Goose	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	Yes								
<i>Anser erythropus</i>	Lesser White-fronted Goose	Birds	VU	VU	EN	IBAT/IUCN	Possible	Full migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6					
<i>Anthus campestris</i>	Tawny Pipit	Birds	LC	LC	NT	Field survey	Confirmed	Full migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Anthus cervinus</i>	Red-Throated Pipit	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	No								
<i>Anthus pratensis</i>	Meadow Pipit	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	No								
<i>Apus apus</i>	Common Swift	Birds	LC	NT	LC	Field survey	Confirmed	Full migrant	No	No	No								
<i>Aquila heliaca</i>	Eastern Imperial Eagle	Birds	VU	LC	EN	Field survey	Confirmed	Resident	No	No	Yes		Yes	Revised Annex I of Resolution 6					
<i>Ardea alba</i>	Great White Egret	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	Yes								
<i>Ardea cinerea</i>	Grey Heron	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	Yes								
<i>Ardea purpurea</i>	Purple Heron	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6					

Scientific Name	Common Name	Type	IUCN Threat Status (global)	IUCN Threat Status (Europe)	Romanian RDL	Data Source	POC	Migration Status	Endemic	Restricted-Range?	Congregatory?	Annex II EU Habitats Directive	Annex I EU Birds Directive	Resolution 6 of Bern Convention	PBF Criteria Triggered				
															2a	2b	2c	3a	4a
<i>Asio flammeus</i>	Short-eared Owl	Birds	LC	LC	VU	Natura 2000	Possible	Passage migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Asio otus</i>	Northern Long-Eared Owl	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	No								
<i>Aythya ferina</i>	Common Pochard	Birds	VU	VU	VU	Natura 2000	Possible	Full migrant	No	No	Yes								
<i>Aythya nyroca</i>	Ferruginous Duck	Birds	NT	LC	EN	Natura 2000	Possible	Full migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6					
<i>Botaurus stellaris</i>	Eurasian Bittern	Birds	LC	LC	VU	Field survey	Confirmed	Passage migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Buteo buteo</i>	Eurasian Buzzard	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	No								
<i>Buteo lagopus</i>	Rough-Legged Buzzard	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	No								
<i>Calidris alpina</i>	Dunlin	Birds	NT	LC	LC	Natura 2000	Possible	Full migrant	No	No	Yes		Yes						
<i>Calidris falcinellus</i>	Broad-billed Sandpiper	Birds	VU	VU	LC	IBAT/IUCN	Possible	Full migrant	No	No	Yes								
<i>Calidris ferruginea</i>	Curlew Sandpiper	Birds	VU	VU	LC	IBAT/IUCN	Possible	Full migrant	No	No	Yes								
<i>Calidris pugnax</i>	Ruff	Birds	LC	NT	LC	Natura 2000	Possible	Full migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6					
<i>Calidris pugnax</i>	Ruff	Birds	LC	NT	LC	Field survey	Confirmed	Full migrant	No	No	No		Yes						
<i>Carduelis carduelis</i>	European Goldfinch	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	No								
<i>Charadrius dubius</i>	Little Ringed Plover	Birds	LC	LC	LC	Natura 2000	Possible	Passage migrant	No	No	No								
<i>Chlidonias hybridus</i>	Whiskered Tern	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6					
<i>Chroicocephalus ridibundus</i>	Black-headed Gull	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	Yes								
<i>Ciconia ciconia</i>	White Stork	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6					
<i>Ciconia nigra</i>	Black Stork	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Circaetus gallicus</i>	Short-tailed Snake-eagle	Birds	LC	LC	VU	Natura 2000	Possible	Full migrant	No	No	No		Yes	Revised Annex I of Resolution 6					

Scientific Name	Common Name	Type	IUCN Threat Status (global)	IUCN Threat Status (Europe)	Romanian RDL	Data Source	POC	Migration Status	Endemic	Restricted-Range?	Congregatory?	Annex II EU Habitats Directive	Annex I EU Birds Directive	Resolution 6 of Bern Convention	PBF Criteria Triggered				
															2a	2b	2c	3a	4a
<i>Circus aeruginosus</i>	Western Marsh-Harrier	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Circus cyaneus</i>	Hen Harrier	Birds	LC	LC	NT	Field survey	Confirmed	Full migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Circus macrourus</i>	Pallid Harrier	Birds	NT	LC	EN	IBAT/IUCN	Possible	Full migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Circus pygargus</i>	Montagu's Harrier	Birds	LC	LC	NT	Field survey	Confirmed	Full migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Columba palumbus</i>	Common Woodpigeon	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	No			Revised Annex I of Resolution 6					
<i>Corvus frugilegus</i>	Rook	Birds	LC	VU	LC	Field survey	Confirmed	Passage migrant	No	No	Yes								
<i>Corvus monedula</i>	Eurasian jackdaw	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	Yes								
<i>Coturnix coturnix</i>	Common Quail	Birds	LC	NT	NT	Field survey	Confirmed	Full migrant	No	No	No								
<i>Crex crex</i>	Corncrake	Birds	LC	LC	VU	Natura 2000	Possible	Full migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Cuculus canorus</i>	Common Cuckoo	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	No								
<i>Cygnus olor</i>	Mute Swan	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	Yes								
<i>Delichon urbicum</i>	Northern House Martin	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	Yes								
<i>Egretta alba</i>	Great White Egret	Birds	LC	LC	LC	Natura 2000	Possible	Passage migrant	No	No	Yes		Yes						
<i>Egretta garzetta</i>	Little Egret	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6					
<i>Emberiza schoeniclus</i>	Reed Bunting	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	No								
<i>Falco cherrug</i>	Saker Falcon	Birds	EN	EN	EN	Field survey	Confirmed	Passage migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Falco columbarius</i>	Merlin	Birds	LC	VU	NT	Natura 2000	Possible	Full migrant	No	No	No		Yes	Revised Annex I of Resolution 6					

Scientific Name	Common Name	Type	IUCN Threat Status (global)	IUCN Threat Status (Europe)	Romanian RDL	Data Source	POC	Migration Status	Endemic	Restricted-Range?	Congregatory?	Annex II EU Habitats Directive	Annex I EU Birds Directive	Resolution 6 of Bern Convention	PBF Criteria Triggered				
															2a	2b	2c	3a	4a
<i>Falco peregrinus</i>	Peregrine Falcon	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Falco tinnunculus</i>	Common Kestrel	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	No								
<i>Falco vespertinus</i>	Red-footed Falcon	Birds	VU	VU	VU	Field survey	Confirmed	Full migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6					
<i>Fulica atra</i>	Common Coot	Birds	LC	NT	LC	Field survey	Confirmed	Passage migrant	No	No	Yes								
<i>Gallinago gallinago</i>	Common Snipe	Birds	LC	VU	VU	Field survey	Confirmed	Full migrant	No	No	No								
<i>Gallinula chloropus</i>	Common Moorhen	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	No								
<i>Grus grus</i>	Common Crane	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6					
<i>Haliaeetus albicilla</i>	White-tailed Sea-eagle	Birds	LC	LC	VU	Field survey	Confirmed	Passage migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Himantopus himantopus</i>	Black-winged Stilt	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6					
<i>Hirundo rustica</i>	Barn Swallow	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	No			Revised Annex I of Resolution 6					
<i>Ixobrychus minutus</i>	Common Little Bittern	Birds	LC	LC	NT	Natura 2000	Possible	Full migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Lanius minor</i>	Lesser Grey Shrike	Birds	LC	LC	VU	Natura 2000	Possible	Full migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Larus cachinnans/michahellis</i>	Caspian Gull	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	Yes								
<i>Larus ridibundus</i>	Black-headed Gull	Birds	LC	LC	LC	Natura 2000	Possible	Passage migrant	No	No	Yes								
<i>Limosa limosa</i>	Black-Tailed Godwit	Birds	NT	NT	NT	Field survey	Confirmed	Full migrant	No	No	Yes								
<i>Locustella fluviatilis</i>	River Warbler	Birds	LC	LC	LC	Natura 2000	Possible	Full migrant	No	No	No								
<i>Locustella luscinioides</i>	Savi's Warbler	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	No								
<i>Locustella naevia</i>	Common Grasshopper-warbler	Birds	LC	LC	LC	Natura 2000	Possible	Full migrant	No	No	No								
<i>Luscinia megarhynchos</i>	Common Nightingale	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	No								

															PBF Criteria Triggered				
Scientific Name	Common Name	Type	IUCN Threat Status (global)	IUCN Threat Status (Europe)	Romanian RDL	Data Source	POC	Migratory Status	Endemic	Restricted-Range?	Congregatory?	Annex II EU Habitats Directive	Annex I EU Birds Directive	Resolution 6 of Bern Convention	2a	2b	2c	3a	4a
<i>Luscinia svecica</i>	Bluethroat	Birds	LC	LC	LC	Natura 2000	Possible	Full migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Mareca penelope</i>	Eurasian Wigeon	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	Yes								
<i>Merops apiaster</i>	Eurasian Bee-eater	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	No								
<i>Milvus migrans</i>	Black Kite	Birds	LC	LC	NT	Natura 2000	Possible	Passage migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Motacilla alba</i>	White Wagtail	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	No								
<i>Motacilla flava</i>	Western Yellow Wagtail	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	No								
<i>Numenius arquata</i>	Eurasian Curlew	Birds	NT	NT	NT	Field survey	Confirmed	Passage migrant	No	No	Yes								
<i>Numenius phaeopus</i>	Whimbrel	Birds	LC	LC	LC	Natura 2000	Possible	Full migrant	No	No	Yes								
<i>Nycticorax nycticorax</i>	Black-crowned Night-heron	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6					
<i>Oenanthe oenanthe</i>	Northern Wheatear	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	No			Revised Annex I of Resolution 6					
<i>Pandion haliaetus</i>	Osprey	Birds	LC	LC	NT	Natura 2000	Possible	Full migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Pernis apivorus</i>	Eurasian Honey-buzzard	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Phoenicurus ochruros</i>	Black Redstart	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	No								
<i>Platalea leucorodia</i>	Eurasian Spoonbill	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6					
<i>Pluvialis apricaria</i>	Eurasian Golden Plover	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6					
<i>Pluvialis squatarola</i>	Grey Plover	Birds	VU	LC	LC	IBAT/IUCN	Possible	Full migrant	No	No	Yes								
<i>Recurvirostra avosetta</i>	Pied Avocet	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6					
<i>Riparia riparia</i>	Collared Sand Martin	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	Yes								

Scientific Name	Common Name	Type	IUCN Threat Status (global)	IUCN Threat Status (Europe)	Romanian RDL	Data Source	POC	Migration Status	Endemic	Restricted-Range?	Congregatory?	Annex II EU Habitats Directive	Annex I EU Birds Directive	Resolution 6 of Bern Convention	PBF Criteria Triggered				
															2a	2b	2c	3a	4a
<i>Spatula clypeata</i>	Northern Shoveler	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	Yes								
<i>Sterna hirundo</i>	Common Tern	Birds	LC	LC	LC	Natura 2000	Possible	Full migrant	No	No	Yes		Yes	Revised Annex I of Resolution 6					
<i>Sylvia nisoria</i>	Barred Warbler	Birds	LC	LC	NT	Natura 2000	Possible	Full migrant	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Tachybaptus ruficollis</i>	Little Grebe	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	No								
<i>Tadorna tadorna</i>	Common Shelduck	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	Yes								
<i>Tringa erythropus</i>	Spotted Redshank	Birds	LC	LC	LC	Natura 2000	Possible	Full migrant	No	No	Yes								
<i>Tringa totanus</i>	Common Redshank	Birds	LC	VU	LC	Field survey	Confirmed	Passage migrant	No	No	Yes								
<i>Troglodytes troglodytes</i>	Northern Wren	Birds	LC	LC	LC	Field survey	Confirmed	Resident	No	No	No		Yes	Revised Annex I of Resolution 6					
<i>Turdus iliacus</i>	Redwing	Birds	LC	LC	LC	IBAT/IUCN	Possible	Full migrant	No	No	No								
<i>Turdus pilaris</i>	Fieldfare	Birds	LC	LC	LC	Field survey	Confirmed	Passage migrant	No	No	Yes								
<i>Upupa epops</i>	Common Hoopoe	Birds	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	No								
<i>Vanellus vanellus</i>	Northern Lapwing	Birds	NT	VU	NT	Field survey	Confirmed	Passage migrant	No	No	Yes								
Invertebrates																			
<i>Anisus vorticulus</i>	Lesser Ramshorn Snail	Invertebrates	DD	NT	EN	IBAT/IUCN	Possible	Resident	No	No	No	Annex II		Revised Annex I of Resolution 6					
<i>Euglesa pseudosphaerium</i>	False-orb Pea Mussel	Invertebrates	VU	VU	N.A.		Possible	Resident	No	No	No								
<i>Leptophyes discoidalis</i>	Blackwing Speckled Bush-cricket	Invertebrates	VU	VU	N.A.	IBAT/IUCN	Possible	Resident	No	No	No								
<i>Lycaena dispar</i>	Large Copper	Invertebrates	NT	LC	VU	Field survey	Confirmed	Resident	No	No	No	Annex II		Revised Annex I of Resolution 6					
<i>Nomada errans</i>	Zwartbuikwespbij	Invertebrates	EN	EN	N.A.	IBAT/IUCN	Possible	Resident	No	No	No								
Mammals																			
<i>Cricetus cricetus</i>	Common Hamster	Mammals	CR	CR	CR	IBAT/IUCN	Possible	Resident	No	No	No								
<i>Eptesicus serotinus</i>	Eurasian Serotine	Mammals	LC	LC	LC	Field survey	Confirmed	Full migrant	No	No	Yes								

															PBF Criteria Triggered				
Scientific Name	Common Name	Type	IUCN Threat Status (global)	IUCN Threat Status (Europe)	Romanian RDL	Data Source	POC	Migratory Status	Endemic	Restricted-Range?	Congregatory?	Annex II EU Habitats Directive	Annex I EU Birds Directive	Resolution 6 of Bern Convention	2a	2b	2c	3a	4a
<i>Lutra lutra</i>	Eurasian Otter	Mammals	NT	NT	NT	Field survey	Confirmed	Resident	No	No	No	Annex II		Revised Annex I of Resolution 6					
<i>Miniopterus schreibersii</i>	Schreiber's Bent-winged Bat	Mammals	VU	VU	EN	Field survey	Confirmed	Full migrant	No	No	Yes	Annex II		Revised Annex I of Resolution 6					
<i>Mustela eversmanii</i>	Steppe Polecat	Mammals	LC	EN	VU	Natura 2000	Possible	Resident	No	No	No	Annex II		Revised Annex I of Resolution 6					
<i>Myotis dasycneme</i>	Pond Bat	Mammals	NT	VU	EN	IBAT/IUCN	Possible	Resident	No	No	No	Annex II		Revised Annex I of Resolution 6					
<i>Spermophilus citellus</i>	European Ground Squirrel	Mammals	EN	EN	VU	Field survey	Confirmed	Resident	No	No	No	Annex II		Revised Annex I of Resolution 6					
Flora (plants, fungi)																			
<i>Alisma gramineum</i>	Ribbon-leaved Waterplantain	Plants	DD	LC	EN	IBAT/IUCN	Possible	Resident	No	No	No								
<i>Bovista paludosa</i>	Fen Puffball	Plants	VU	N.A.	EN	IBAT/IUCN	Possible	Resident	No	No	No								
<i>Cirsium brachycephalum</i>		Plants	LC	LC	VU	Natura 2000	Possible	Resident	No	No	No	Annex II		Revised Annex I of Resolution 6					
<i>Elatine alsinastrum</i>		Plants	NT	NT	CR	IBAT/IUCN	Possible	Resident	No	No	No								
<i>Galeopsis segetum</i>	Downy Hemp-nettle	Plants	DD	DD	EN	IBAT/IUCN	Possible	Resident	No	No	No								
<i>Gastrosporium simplex</i>	Steppentüffel	Plants	NT	NT	EN	IBAT/IUCN	Possible	Resident	No	No	No								
<i>Hygrocybe aurantiosplendens</i>	Orange Waxcap	Plants	VU	N.A.	VU	IBAT/IUCN	Possible	Resident	No	No	No								
<i>Marsilea quadrifolia</i>	Water Shamrock	Plants	LC	VU	EN	Natura 2000	Possible	Resident	No	No	No	Annex II		Revised Annex I of Resolution 6					
<i>Picipes rhizophilus</i>	Steppengras-Schwarzfußporlin	Plants	VU	N.A.	N.A.	IBAT/IUCN	Possible	Resident	No	No	No								
<i>Tozzia carpathica</i>	Carpathian Tozzia	Plants	DD	DD	EN	IBAT/IUCN	Possible	Resident	No	No	No	Annex II		Revised Annex I of Resolution 6					

7.3 Annexure C: Requirements of IFC and EBRD for CH and PBF

7.3.1 EBRD Requirements for CH

Paragraph 15 and 16 of EBRD ESR6 provides the requirements for the management of critical habitat, as follows:

15. Critical habitat will not be further fragmented, converted or degraded to the extent that its ecological integrity or biodiversity importance is compromised. Consequently, in areas of critical habitat, the client will not implement any project activities unless the following conditions are met:

- no other viable alternatives within the region exist for development of the project in habitats of lesser biodiversity value;
- stakeholders are consulted in accordance with ESR 10;
- the project is permitted under applicable environmental laws, recognising the priority biodiversity features;
- the project does not lead to measurable adverse impacts on those biodiversity features for which the critical habitat was designated as outlined in paragraph 14;
- the project is designed to deliver net gains for critical habitat impacted by the project, with monitoring systems to demonstrate them;
- the project is not anticipated to lead to a net reduction in the population of any endangered or critically endangered species, over a reasonable time period; and
- a robust and appropriately designed, long-term biodiversity monitoring and evaluation program aimed at assessing the status of critical habitat is integrated into the client's adaptive management program.

16. In such cases where a client is able to meet these requirements, the project's mitigation strategy will be described in a biodiversity management plan or biodiversity action plan, wherever appropriate.

Source: EBRD ESR6 (2024).

7.3.2 EBRD Requirements for PBF

Paragraph 13 of EBRD ESR6 provides the requirements for the management of PBF, as follows:

13. Where the assessment has identified that the project could have significant, adverse and irreversible impacts on priority biodiversity features, the client will not implement any project related activities unless:

- the client can demonstrate that there are no technically and economically feasible alternatives;
- stakeholders are consulted in accordance with ESR 10;
- the project is permitted under applicable environmental laws, recognising the priority biodiversity features; and
- appropriate mitigation measures are put in place, in accordance with the mitigation hierarchy, to ensure no net loss and preferably a net gain of priority biodiversity features and the habitats and ecological functions that support them over the long term to achieve measurable conservation outcomes.

Source: EBRD ESR6 (2024)

7.3.3 IFC Requirements for CH

Paragraphs 17 and 18 of IFC PS6 provides the requirements for the management of critical habitat, as follows:

17. In areas of critical habitat, the client will not implement any project activities unless all of the following are demonstrated:

- No other viable alternatives within the region exist for development of the project on modified or natural habitats that are not critical;

- The project does not lead to measurable adverse impacts on those biodiversity values for which the critical habitat was designated, and on the ecological processes supporting those biodiversity values;
- The project does not lead to a net reduction in the global and/or national/regional population of any Critically Endangered or Endangered species over a reasonable period of time; and
- A robust, appropriately designed, and long-term biodiversity monitoring and evaluation program is integrated into the client's management program.

18. In such cases where a client is able to meet the requirements defined in paragraph 17, the project's mitigation strategy will be described in a Biodiversity Action Plan and will be designed to achieve net gains of those biodiversity values for which the critical habitat was designated.

Source: IFC PS6 (2012).

8. Appendices

8.1 Appendix A: IBAT PS6 Report

See separate PDF attachment (IBAT, 2026)

[File name: 'Appendix A_IBAT Report_Dama Solar PV_10.02.2026'.pdf']

8.2 Appendix B: Supplementary Field Verification Report for Critical Habitat (1530* Pannonic salt steppes and salt marshes)

See separate PDF attachment (Wilderness Research and Consultancy and ERM, 2024)

[File name: 'Appendix B_Dama Arad Solar PV_Report on critical habitat verification_V1_14Oct2024.pdf']

8.3 Appendix C: Species Screening Database

See separate Microsoft Excel™ spreadsheet (TLCommunications, 2026)

[File name: 'Appendix C_Dama Solar PV_CHA Species List_V2_12.02.2026.xls']