Critical Habitat Assessment Update for Dunarea East Wind Farm, Romania

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Acronym table

Acronym	Definition
AZE	Alliance for Zero Extinction (site)
BAP	Biodiversity Action Plan
CH	Critical Habitat
CHA	Critical Habitat Assessment
CLC	CORINE Land Cover
CR	Critically Endangered
EAAA	Ecologically Appropriate Area of Analysis
EEA	European Environment Agency
EN	Endangered
EOO	Extent of Occurrence
ESIA	Environmental and Social Impact Assessment
EBRD ESR6	European Bank for Reconstruction and Development, Environmental and Social Standard 6
GBIF	Global Biodiversity Information Facility
GN	(IFC) Guidance Note
IBA	Important Bird and Biodiversity Area
IBAT	Integrated Biodiversity Assessment Tool
IFC PS6	International Finance Corporation, Performance Standard 6
IRA	Internationally Recognised Areas
IUCN	International Union for Conservation of Nature
KBA	Key Biodiversity Area
LC	Least Concern
LPA	Legally Protected Area
NH	Natural Habitat
NNL	No Net Loss
NT	Near Threatened
MH	Modified Habitat
PA	Protected Area
POWO	Plants Of the World Online
SAC	Special Areas of Conservation
SCI	Sites of Community Importance
SPA	Special Protection Area
RR	Restricted Range

Acronym	Definition
TBC	The Biodiversity Consultancy
VU	Vulnerable
WFO	World Flora Online

1 Introduction

1.1 Purpose and context

Midmar Callatis S.R.L (the Client) has commissioned The Biodiversity Consultancy (TBC), to update an existing Rapid Critical Habitat Assessment (CHA) for the Dunarea-East Wind Farm (the Project) in County Constanta, Romania.

The Project has been approved at the national level, and the Client is current considering obtaining finance from the International Finance Corporation (IFC) and European Bank for Reconstruction and Development (EBRD). The existing Rapid CHA, written by ERM in 2023 was developed in alignment with IFC Performance Standard 6 (IFC PS6) and Guidance Note 6, EBRD Performance Requirement 6 (EBRD PR6). Furthermore, the biodiversity information relevant to the Project has been updated and new documents such as the International Environmental and Social Impact Assessment (DNV Italy, 2026) have been developed and incorporated into this updated CHA.

This CHA update incorporates the recent EBRD biodiversity requirements, specifically the transition from PR6 to ESR6 under the 2024 Environment and Social Policy, while maintaining alignment with IFC PS6. The CHA update addresses clarified expectations introduced into the recent ESR6 Guidance Note (EBRD 2025), including refinements to the delineation of the ecologically appropriate area of analysis (EAAA), with increased emphasis on aligning the spatial scope of the assessment to the ecological characteristics and impact pathways on habitats and species present within the study area.

The aim of this CHA is to identify potential Critical Habitat-qualifying species and ecosystems, based on IFC PS6, EBRD ESR6 criteria and thresholds, which will require special attention and specific mitigation planning, and to determine whether the Project is in an area of Natural or Modified Habitat. EBRD ESR6 also defines Priority Biodiversity Features (PBFs), which have also been included in this CHA.

1.2 Description of the project

The Project is one of Romania's largest onshore renewable energy developments, located in the extra-urban area of Deleni Commune, Constanța County. It forms part of the broader Dunarea Wind Farm initiative, originally conceived as a 600 MW project and later divided into Dunarea East and Dunarea West to meet Romanian permitting requirements. The Project fulfils critical national, regional and international policy objectives, namely Romania's National Integrated Energy and Climate Change Plan 2020-2030, which requires major expansion of Romania's renewable energy capacity. It will contribute to EU-wide renewable energy and de-carbonisation targets.

The Project (Dunarea East) comprises 45 wind turbines with a nominal capacity of up to 7 MW each, giving a total installed capacity of up to 315 MW. Annual generation is expected to reach

~750 GWh, contributing significantly to Romania's renewable energy targets and EU climate objectives.

Key permanent infrastructure includes:

- 45 wind turbine generators (121-128 m hub height, 162-165 m rotor diameter.
- Internal access roads (new and upgraded)
- A 33/400 kV substation (Deleni substation)
- Underground 33 kV collector cables
- Two short 400 kV overhead line connections, approximately 300 m in length (associated facilities)

The project is designed for a 30–35-year operational life, after which repowering or decommissioning is planned.

1.3 Ecological context

The Project site land is currently used for agriculture, with the intended use of arable land, pasture, and land for special purposes - road communication (service road). The Project area is located within the Pontic Steppe Ecoregion (PA0814)[1]. This region is characterized by a temperate climate with appreciable winter rain, generating characteristic European steppe vegetation, dominated by feather grasses (*Stipa* spp.) and fescues (*Festuca* spp.). The major habitats in the area are the Ponto-Sarmatic steppes and Ponto-Sarmatic deciduous thickets or oak dominated steppe woods. However, the area occupied by the Project has been progressively transformed into arable land and pastures, with a floristic composition that is strongly modified due to agriculture and cattle and sheep grazing, to a point where very little of these natural habitats are found today. And what remains is highly fragmented, occurring only in isolated pockets within the mosaic of pastures and farmland (ERM 2023a).

In ERM's Biodiversity Impact Assessment (2023c), 8 species of vascular plants were identified as listed on the National Red List, but all listed as Least Concern.

The ERM's biodiversity monitoring reports (2022-2023), indicate presence of bird species listed on Annex I of the EU Birds Directive. A total of 22 species or species groups of bats were recorded; all species are listed in Annex IV (strictly protected species), and one of them, *Miniopterus schreibersii*, is listed in Annex II of the Habitat Directive, as well as assessed as Vulnerable (VU) by IUCN Red List[2]. Mammal surveys were conducted for the Project in 2021,

[1] https://www.oneearth.org/bioregions/pontic-steppe-grasslands-pa16/

[2] https://www.iucnredlist.org/

recording three mammal species listed on Annex II and IV of Habitats Directive, and according to the IUCN these are threatened at international level.

As described in the 2023 ERM's Scoping report (ERM 2023d), the Project area partially overlaps two Natura 2000 sites: ROSCI0353 Pestera – Deleni Natural Area and ROSCI0071 Dumbraveni – Valea Urluia Natural Area - Lacul Vederoasa This overlap is through one turbine that is located within each of the above protected areas, yet both are sited in arable land with no conservation value (DNV Italy, 2026).

1.4 IFC PS6 and EBRD ESR6

The objectives of IFC PS6 and EBRD ESR6 are to protect and conserve biodiversity, adopt the mitigation hierarchy, maintain benefits from ecosystem services, and promote the sustainable management of living natural resources through the adoption of practices that integrate conservation needs and development priorities.

1.4.1 Critical Habitat, Natural Habitat and Priority Biodiversity Features

IFC PS6 requires projects to classify the area within which they operate into the following categories: Modified Habitat, Natural Habitat and Critical Habitat based on the extent of human modification of the ecosystem and the presence of high biodiversity values (Table 1).

Table 1. Summary of the PS6 scheme for classifying habitat.

		Human modification of the ecosystem	
		Not significant	Significant
High biodiversity values	Present	**Critical Habitat**	**Critical Habitat**
	Absent	**Natural Habitat**	**Modified Habitat**

Note: No universal thresholds exist for identifying natural habitat and modified habitat

As a rule of thumb, a project should favour developments in areas of modified habitat over Natural Habitat, and Natural Habitat over critical habitat. It must demonstrate the full application of the mitigation hierarchy framework to manage biodiversity impacts (avoid, minimise, restore, and when needed, offset) (CSBI & TBC 2015) in consultation with relevant stakeholders, and should achieve a no net loss of biodiversity in areas of Natural Habitat and a net gain in critical habitat.

The relevant lender standard/requirement guidance notes (IFC 2019; EBRD 2025) provide further guidance through well-defined criteria and thresholds on how to identify critical habitat, as well as guidance on identifying natural and modified habitat (IFC 2019), which are summarised in Appendix 1.

Criteria to consider when assessing the presence of critical habitat are:

1. **Globally and/or regionally threatened species** (IFC PS6 Criterion 1, EBRD ESR6 Criterion 2)
2. **Endemic and restricted range species** (IFC PS6 Criterion 2, EBRD ESR6 Criterion 3)
3. **Migratory and congregatory species** (IFC PS6 Criterion 3, EBRD ESR6 Criterion 4)
4. **Highly Threatened and/or Unique Ecosystems** (IFC PS6 Criterion 4, EBRD ESR6 Criterion 1)
5. **Key evolutionary processes** (IFC PS6 Criterion 5 and EBRD ESR6 Criterion 5)

The determination of critical habitat for the first four criteria in the above list (corresponding to IFC PS6 Criteria 1-4 and EBRD ESR6 Criteria 1 and 2) is based on quantitative thresholds, whereas the last criteria above (IFC PS6 Criterion 5) is determined through a qualitative expert-based judgement (see Appendix 1). The identification of critical habitat should be done at a landscape-level to consider the dynamics of the ecosystem beyond the project footprint. IFC PS6 and EBRD ESR6 also make provision for Legally Protected Areas (LPAs) and Internationally Recognised Areas (IRAs), which should be duly identified and mapped (see PS6 paragraph 20).

IFC PS6 defines Natural Habitat as "*areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area's primary ecological functions and species composition*". It also notes that "Project sites will often be located among a mosaic of habitats with varying levels of anthropogenic and/or natural disturbance. Clients are responsible for delineating the project site as best as possible in terms of modified and Natural Habitat. This determination is made based on the level of human-induced disturbance (for example, presence of invasive species, level of pollution, extent of habitat fragmentation, viability of existing naturally occurring species assemblages, resemblance of existing ecosystem functionality and structure to historical conditions, degree of other types of habitat degradation) and the biodiversity values of the site (for example, threatened species, ecosystems, and ecological processes necessary for maintaining nearby critical habitats). The level of anthropogenic impact should be determined with respect to the greater landscape/seascape in which the project is located."

IFC PS6 and EBRD ESR6 stipulate that critical, natural and modified habitats should be mapped within an Ecologically Appropriate Area of Analysis (EAAA) (PS6 GN26). The EAAA is identified at a landscape level, considering large-scale ecological processes where appropriate, which are often larger than the project impact area to ensures all risks are taken into consideration. The EAAA is designed to ensure that the biodiversity significance of the project landscape is appropriately evaluated; it is not a management unit and the choice of EAAA does not place any management obligations on the project.

In addition to critical habitat values, EBRD ESR6 also considers a suite of PBFs which are of lower concern, but still important for a project to consider. PBFs include: threatened ecosystems, threatened, range-restricted, migratory and congregatory species (see Appendix 1 for details) (EBRD 2025).

1.4.2 Implications of findings

Projects located within critical habitat need to pay special attention to the management of biodiversity impacts, especially on the biodiversity values that trigger critical habitat.

Where impacts do occur, lender standards require projects to fully execute the mitigation hierarchy. In critical habitat, this means that overall net gain of critical habitat-qualifying biodiversity is required. A high threshold of proof will be required to demonstrate that it is feasible to deliver these net gains.

Critical habitat determination is an assessment of the biodiversity importance of an area, based on the biodiversity values and not the potential impacts associated with a project. The presence of critical habitat does not necessarily imply an impact from the project. Table 2 shows the requirements of IFC PS6 paragraph 17 and 18, with respect to critical habitat[3]. EBRD has similar requirements.

The projects will also need to meet the IFC PS6 expectations for the management of impacts on modified and Natural Habitat. Table 3 shows the requirements of IFC PS6 paragraph 15 with respect to these.

Table 2. IFC PS6 paragraphs 17 & 18 on critical habitat.

PS6 reference	PS6 text
PS6 paragraph 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** in 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; • A robust, appropriately designed, and **long-term biodiversity monitoring and evaluation program** is integrated into the client's management program'.
PS6 paragraph 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 (BAP)** and will be designed to achieve **net gains** of those biodiversity values for which the critical habitat was designated'.

[3] IFC is generally the most stringent of the lenders in regard to critical habitat.

Table 3. IFC PS6 paragraphs related to requirements for projects in natural habitat and modified habitat that holds significant biodiversity value.

PS6 reference	PS6 text
PS6 paragraph 12	'This Performance Standard applies to those areas of modified habitat that include **significant biodiversity value**, as determined by the risks and impacts identification process required in Performance Standard 1. The client should **minimize impacts** on such biodiversity and **implement mitigation measures** as appropriate.'
PS6 paragraph 15	'In areas of natural habitat, mitigation measures will be designed to achieve **no net loss** of biodiversity where feasible.'
PS6 footnote 9	'No net loss is defined as the point at which project-related impacts on biodiversity are balanced by measures taken to avoid and minimize the project's 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).

It should be noted that, according to IFC PS6 and EBRD ESR6, areas not acceptable for financing (with the possible exception of projects specifically designed to contribute to the conservation of the area) include UNESCO World Heritage Sites and Alliance for Zero Extinction (AZE) Sites (IFC 2019; EBRD 2025).

2 Determination of critical habitat

2.1 Review of available information

TBC consulted the Integrated Biodiversity Assessment Tool (IBAT)[4], a source of globally authoritative biodiversity datasets including the IUCN Red List of Threatened Species, the World Database on Protected Areas, and the World Database of Key Biodiversity Areas (including Important Bird and Biodiversity Areas). IBAT was used to identify the presence of threatened, restricted-range and migratory species, protected areas, Key Biodiversity Areas (including Important Bird and Biodiversity Areas), World Heritage Sites and Alliance for Zero Extinction sites. European Environment Agency (EEA) CORINE land cover data was used to classify natural and modified habitats within the Ecologically Appropriate Areas of Analysis.

In addition to IBAT, several internationally and nationally relevant datasets and assessments were consulted, including:

- The IUCN Red List of Threatened Species (IUCN Red List of Threatened Species)
- The European Red List of Threatened Species (European Red List)

[4] Integrated Biodiversity Assessment Tool

- Romania National Red List of Plants (Oltean et al, 1994)
- Romania National Red List of Birds (Monitorul Oficial al României, 2022)
- IUCN Red List of Ecosystems (IUCN Ecosystems)
- The Global Biodiversity Information Facility (GBIF) (https://www.gbif.org/)
- eBird (http://www.ebird.org)
- BirdLife data zone (http://datazone.birdlife.org/home)
- Movebank (Movebank)
- POWO – Plants of the world online, Royal Botanic Gardens, Kew (https://powo.science.kew.org)
- WFO – The World Flora Online (http://wfoplantlist.org)

The following documents were developed for the Project and have also been consulted in the preparation of this assessment:

- International Environmental and Social Impact Assessment (ESIA) (DNV Italy 2026)
- Studiu de evaluare adecvata pentru construire parc eolican. Societatea de Cercetare a Biodiversitatii si ingineria mediului AON, Constanta, Romania (AON 2025a)
- Rapid Critical Habitat Assessment Report (ERM 2023a)
- Biodiversity Monitoring report 1: 450 MW Vis Viva Wind Farm Buzau County and 552 MW Adamdel Wind Farm Constanta County, Romania, 1 August, 2022 (ERM 2022a)
- Biodiversity Monitoring report 1: 450 MW Vis Viva Wind Farm Buzau County and 552 MW Adamdel Wind Farm Constanta County, Romania 2 November, 2022 (ERM 2022b)
- Biodiversity Monitoring report 1: 450 MW Vis Viva Wind Farm Buzau County and 552 MW Adamdel Wind Farm Constanta County, Romania 3 January, 2023 (ERM 2023b)
- Raport de progres nr. 01 – Monitorizarea biodiversității, Parc eolian Deleni, județul Constanța, February 2026 (AON 2026),

2.2 Ecologically Appropriate Area of Analysis (EAAA)

In line with IFC PS6 Guidance Note 6 (IFC 2019) and EBRD ESR6 Guidance Note (EBRD 2025), a CHA should be conducted for all the species with regular occurrence in the Project's area of influence, or ecosystem, covered by Criteria 1-4, within an Ecological Appropriate Area of Analysis (EAAA). The delineation of EAAAs was conducted in accordance with GN6, ESR6 Guidance Note and EBRD's industry briefing note on managing the risks of wind power plants to birds and bats (EBRD, 2026).

Following a pragmatic, yet precautionary, approach, two EAAAs were defined for this Project (Figure 1): a larger one for more mobile species (Avian EAAA) and a smaller one for species with less mobility, including bats and for terrestrial and aquatic habitats (Terrestrial EAAA). The Terrestrial EAAA was defined to comprise the Project area, including the full extent of the main

catchment area within which the Project infrastructure occurs, following the boundaries of Peștera-Deleni Special Protection Area (SPA) to the north and Dumbrăveni SPA to the south, connect to the west through areas of contiguous habitats. The Avian EAAA was defined using the Project area, and the boundaries of (legacy) Key Biodiversity Areas, Dumbrăveni – Plopeni to the south and Aliman-Adamclisi to the north, extending to the east to join these two protected areas. Please refer to Figure 3 and Figure 4 to see the spatial extent of the Protected Areas in relation to the Project and EAAAs.

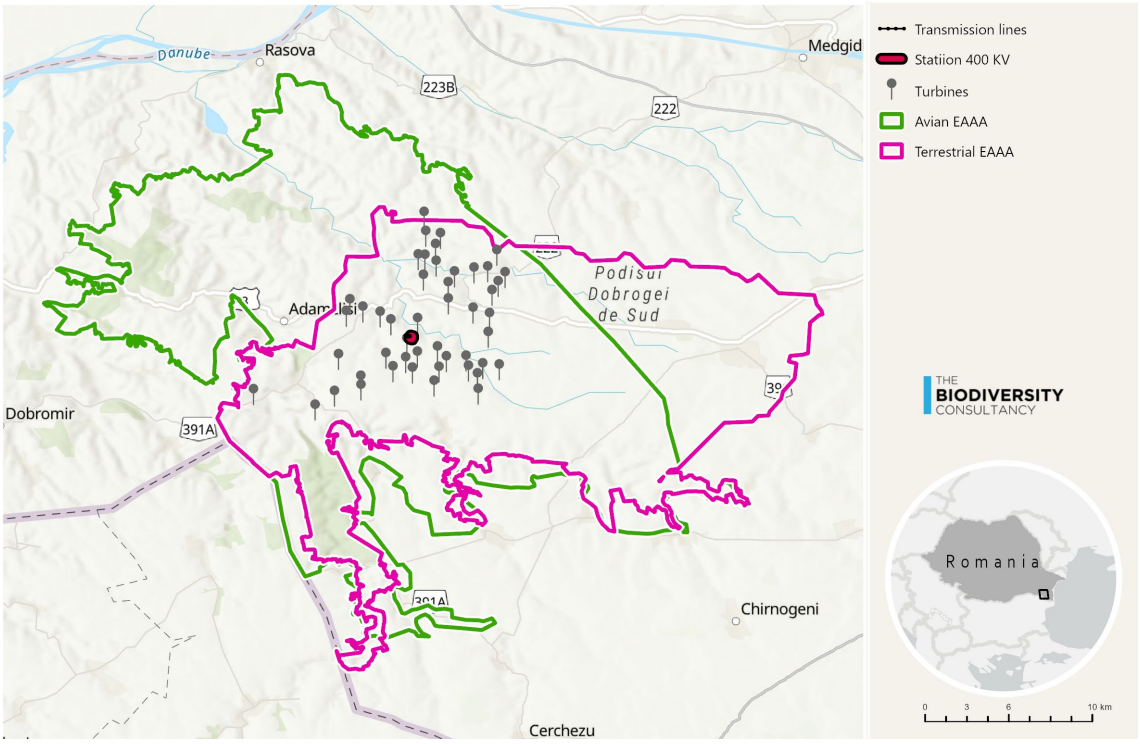

Figure 1. Map of the Avian EAAA and Terrestrial EAAA in relation to Project infrastructure

This approach allowed to determine which species could potentially exceed the defined thresholds for critical habitat (see section 2.3).

2.3 CH Determination

To support the identification of Critical Habitat- qualifying features, TBC conducted an IFC PS6/EBRD ESR6 aligned biodiversity screening, to identify a shortlist of species and ecosystems/habitats for more detailed assessment. These included:

- All globally or nationally Critically Endangered (CR), Endangered (EN) and Vulnerable (VU) species with overlap between the EAAAs and their global ranges and potential presence in the EAAAs
- All restricted range species

- Migratory and congregatory species, either i) with greater than 1% overlap between the EAAAs and their respective global ranges, or ii) recorded in the EAAAs in numbers that possibly exceed 1% of the global population
- Species triggering KBA and/or IBA criteria in the KBAs/IRAs overlapping, or in proximity to, the EAAAs.
- Habitats listed on Annex I of the EU Habitats directive especially those marked as 'priority habitat type' or Resolution 4 of the Bern Convention.
- Species listed on Annex II of the EU Habitats Directive and those marked as 'priority species', Annex I of the Birds Directive or Resolution 6 of the Bern Convention.
- Species on Regional or National Red Lists listed as CR or EN within the Projects area of impact

A long list of 1045 species that overlap with the relevant EAAAs was obtained via IBAT. These species were then screened firstly based on known presence or likelihood of presence within the EAAAs, and secondly to discount those which would clearly not meet relevant thresholds (e.g. due to the low level of range overlap, habitat unsuitability.) The subsequent shortlist of species was then assessed against the applicable CH criteria and thresholds (Appendix 1) and informed by field survey data, secondary data and expert input on their status and distribution within the terrestrial and avian EAAAs. Where population data was not available, the overlap between the species range and the EAAA was used as a proxy for the population likely to be present.

Five categories of certainty were used based on the evidence that a species qualifies as triggering Critical Habitat:

- **Confirmed –** if data demonstrate exceedance (e.g. numbers based on field surveys);
- **Likely** – if the range overlap, or other evidence, suggests the EAAA is likely to exceed the threshold, and the species' presence has been confirmed in the Project area;
- **Possible** – if the range overlap is close to the threshold, or there is the potential for the EAAA to have a higher proportion of the population than average, and the species' presence has been confirmed in the Project area;
- **Non-conclusive** - If the outcome of the assessment would have otherwise been likely/possible CH, but the species presence has not been confirmed in the Project area; and,
- **Not CH** – if available evidence is that the threshold is not exceeded.

2.4 Constraints and limitations

Potential constraints to the desktop-based analysis for this CHA include the usage of some global biodiversity datasets, which may not yet include species that could be present, but which have not yet been evaluated on the IUCN Red List.

Those species with national Red List assessments were possible to assess against Criterion 1.c (IFC 2019) but this criterion does not provide quantitative thresholds for assessment, requiring the use of expert judgement.

Additionally, the application of the quantitative Critical Habitat thresholds should be considered precautionary, due to lack of population data for some species. In some cases, lack of precise information on species distribution makes it challenging to determine whether a species is likely to meet the IFC PS6 GN6 thresholds for criteria 1-3 and equivalent criteria for EBRD ESR6.

3 Results of the CHA

A total of 1045 species were identified for Critical Habitat screening based on their potential presence in the relevant EAAAs as indicated in IUCN Red List distribution maps, other global datasets such as GBIF, eBird or BirdLife data zone, or from field survey data. See Appendix 2 for a subset of species screened (171). A total of 16 species were assessed in detail against IFC PS6 and EBRD ESR6 criteria for CH (see Table 4 for results and Appendix 1 for criteria and thresholds).

Under IFC PS6, no habitats or species were found to reach the thresholds and qualify as Critical Habitat. No species qualify as Critical Habitat under EBRD ESR6.

Three habitats, listed as priority habitats in Annex I of the EU Habitats Directive are likely to qualify as Critical Habitat under EBRD ESR6, due to their presence in the Project's Area of Impact. These are:

- **62C0* Ponto-Sarmatic steppes with *Stipion lessingianae* plant associations**
- **91I0* Euro-siberian forest-steppe with Quercus spp.**
- **40C0 Ponto-Sarmatic deciduous thickets, with *Pruno spinosae-Crataegetum* plant associations**

3.1 Critical habitat- qualifying species

3.1.1 Endangered (EN) and Critically Endangered (CR) species

A total of three globally EN or CR species were assessed in detail against Criterion 1.a. of IFC PS6 and the equivalent criteria of EBRD ESR6 (see Appendix 1). These include two mammals, the CR Common Hamster (*Cricetus cricetus*) and the EN European Ground Squirrel (*Spermophilus*

citellus), and one bird, the EN Saker Falcon (*Falco cherrug*). Of these, none of the species qualified as Critical Habitat under the aforementioned criteria.

A total of six globally VU species were assessed in detail against Criterion 1.b. of IFC PS6 and the equivalent criteria of EBRD ESR6 (see Appendix 1). These include one VU mammal, the Romanian Hamster (*Mesocricetus newtoni*), one VU reptile, the Common Tortoise (*Testudo graeca*); and four birds, the Eastern Imperial Eagle (*Aquila heliaca),* Greater Spotted Eagle (*Clanga clanga),* Red-footed Falcon (*Falco vespertinus*) and the European Turtle Dove (*Streptopelia turtur*). However, none of these species were considered possibly or likely to qualify as CH under this Criterion (see Table 4).

A total of 6 nationally or regionally (listed on the European Red List) EN or CR were assessed in detail against Criterion 1.c. of IFC PS6 and the equivalent criteria of EBRD ESR6 (see Appendix 1). These include three regionally CR/EN mammals, the European Ground Squirrel, the Romanian Hamster and Mehely's Horseshoe Bat; and three birds, two nationally EN, the Saker Falcon and Greater Spotted Eagle and one nationally CR, the Eastern Imperial Eagle. However, none of these species were considered possibly or likely to qualify as CH under this Criterion.

3.1.2 Endemic and restricted-range species

A total of two restricted-range species were assessed in detail against Criterion 2 of IFC PS6 and the equivalent criteria of EBRD ESR6 (see Appendix 1). These were the Romanian Hamster and the Pleated Snowdrop (*Galanthus plicatus*). However, neither species was considered possibly or likely to qualify as CH under this Criterion (see Table 4).

3.1.3 Migratory and congregatory species

A total of 11 migratory bird species, primarily migratory soaring birds, were assessed in detail against Criterion 3 of IFC PS6 and the equivalent criteria of EBRD ESR6. However, none of these species were considered possibly or likely to qualify as CH under this Criterion.

Table 4. Species assessed in detail against Critical Habitat criteria. For a longer list of species screened, refer to Table A1 of Appendix 2.

Scientific name	Common English name	Global RL status [1]	National / Regional RL status	EU Directives	Presence in EAAA [2]	Source for EAAA confirmation	Critical Habitat Criteria [3]	Conclusion [4]	Justification
Plants									
Galanthus plicatus	Pleated Snowdrop	LC	LC (Europe) VU (Romania)	N/A	Unconfirmed	N/A	Assessed against IFC PS6 C2 3 and EBRD ESR6 C3.	Not CH (PS6 or ESR6)	*Galanthus plicatus* is native to a relatively restricted range around the Black Sea, occurring in Crimea, southern Ukraine, Romania, Moldova, and northern Turkey. It grows mainly in deciduous woodland and forest edges, often on well-drained, humus-rich soils from lowlands to foothills. It has a global range of 30,674 km^2. However, it has not been recorded during any of the field surveys and there is limited suitable habitat within the Terrestrial EAAA. As such there is no evidence that the Terrestrial EAAA regularly holds ≥10% of the global population size AND ≥10 reproductive units of a species. It therefore does not qualify as Critical Habitat.
Mammals									
Spermophilus citellus	European Ground Squirrel	EN	EN (Europe)	Annex II Habitats Directive Resolution 6 of the Bern Convention	Confirmed	ERM 2022a	Assessed against IFC PS6 C1.a and EBRD ESR6 C2.	Not CH (PS6 or ESR6) PBF (ESR Criteria 2.a and 2.b)	The European Ground Squirrel is endemic to central and south-eastern Europe. It has undergone significant decline over recent generations. It is restricted to short-grass steppe and similar artificial habitats (pastures, airfields, lawns, sports fields, golf courses) on light, well-drained soils, where it can excavate its burrows. In Romania, since 2005, some 1,100 colonies have been identified, 77% of which in the eastern population. It is

Scientific name	Common English name	Global RL status [1]	National / Regional RL status	EU Directives	Presence in EAAA [2]	Source for EAAA confirmation	Critical Habitat Criteria [3]	Conclusion [4]	Justification
									most abundant in the eastern (Moldavia) and south-eastern parts (Dobruja) of the country. The vast majority of its Romanian habitats are sheep-grazed. The species was recorded during the monitoring studies for this Project, with numerous individuals and burrows recorded. The Terrestrial EAAA overlaps 0.09% of the species' mapped range suggesting it would not be present in such significant numbers to meet the threshold of IFC C1.a. However, this is a PBF species according to ESR6.
Cricetus cricetus	Common Hamster	CR	CR (Europe)	Annex II Habitats Directive	Unconfirmed	N/a	Assessed against IFC PS6 C1.a and equivalent EBRD ESR6 Criteria	Not CH (PS6 or ESR6) PBF (ESR Criterion 2.b)	The Common Hamster has a large global range; in Europe, it occurs from Belgium, the Netherlands and Eastern France (Alsace) in the West to Russia in the East, and from central Germany, Poland and Russia in the North to Bulgaria in the South. Its original habitat was fertile steppe and grassland, but it has successfully spread into a variety of anthropogenic habitats including meadows, croplands (especially cereals), and field edges, road verges and scrubby fallow areas on farms. Its global range does not overlap with the Terrestrial EAAA and it wasn't recorded during the monitoring studies for this Project. It is therefore not considered to trigger the CH thresholds for the assessed criteria. However, this is a PBF species according to ESR6.

Scientific name	Common English name	Global RL status [1]	National / Regional RL status	EU Directives	Presence in EAAA [2]	Source for EAAA confirmation	Critical Habitat Criteria [3]	Conclusion [4]	Justification
Mesocricetus newtoni	Romanian Hamster	VU	VU (Europe)	Annex II Bern Convention Annex II and IV Habitats Directive	Confirmed	2021 Survey as per ESIA. 2025	Assessed against IFC PS6 Criterion 1.b and 2.a	Not CH (PS6 or ESR6) PBF (ESR Criterion 3.a)	The Romanian Hamster is a globally VU species and its range is restricted to lowlands (up to 460 m) along the right bank of the lower Danube River in northern Bulgaria and southeastern Romania, Dobrudja. It is found in relatively dry habitats including barren, rocky steppe and steppe grassland, *Medicago*, *Taraxacum* and cereal fields, vineyards, gardens, and scrubby slopes. The terrestrial EAAA overlaps with the global range by 1.05% and it was recorded during the initial 2021 baseline surveys. The adjacent Natura 2000 SCI Pestera Deleni, is designated as such because of the presence of this species. However, current evidence does not indicate that the species exists in sufficient abundance (>10%) to trigger C2.a, nor for its loss to warrant a change in Red List Status to Endangered (EN) or Critically Endangered (CR). Therefore, it does not trigger Critical Habitat under Criterion 1.b or 2.a. Nevertheless, this is a PBF species according to ESR6.
Reptiles									
Testudo graeca	Common Tortoise	VU	NT (Europe)	Annex II Bern Convention	Confirmed	GBIF	Assessed against IFC PS6 Criterion 1.b	Not CH (PS6 or ESR6)	*Testudo graeca* is a globally VU species, occurring across the Mediterranean Basin, from southern Europe and North Africa to the Middle East and western Asia (including Turkey and Iran), with a broad but fragmented distribution. It inhabits open, dry habitats

Scientific name	Common English name	Global RL status [1]	National / Regional RL status	EU Directives	Presence in EAAA [2]	Source for EAAA confirmation	Critical Habitat Criteria [3]	Conclusion [4]	Justification
				Revised Annex I of Resolution 6				PBF (ESR6 Criterion 2.b)	in Mediterranean climates—such as scrubland, shrub steppe, open woodland, dunes, and rocky slopes—favouring well-drained soils for burrowing and nesting, from sea level to ~1,500 m. Although not recorded during Project specific field surveys, it is known to inhabit the project area, being recorded through citizen science. However, current evidence does not indicate that the species exists in sufficient abundance for its loss to warrant a change in Red List Status to Endangered (EN) or Critically Endangered (CR). Therefore, it does not trigger Critical Habitat under Criterion 1.b. However, this is a PBF species according to ESR6.
Insects									
Not applicable - no CR, EN, VU, endemic or restricted-range species identified in the study area									
Bats									
Rhinolophus mehely	Mehely's Horseshoe Bat	VU	EN (Europe)	Annex II and IV (EU Habitats Directive)	Confirmed	ERM 2022a ERM 2022b ERM 2023b	Assessed against IFC Criterion 1.b and EBRD ESR6 2.c	Not CH (IFC or EBRD) PBF (ESR Criterion 2.c)	Mehely's Horsehoe Bat (Rhinolophus mehelyi) forages in Mediterranean shrubland and woodland, in dry steppes and particularly link to water bodies. This species has a wide range in the Palaearctic, occurring from North Africa and southern Europe through south-west Asia, the Caucasus, Iran, Afghanistan, Pakistan and the Himalayas to south-eastern China, Korea, and Japan.

Scientific name	Common English name	Global RL status [1]	National / Regional RL status	EU Directives	Presence in EAAA [2]	Source for EAAA confirmation	Critical Habitat Criteria [3]	Conclusion [4]	Justification
									The species was recorded 20 times using a static detector during the Monitoring studies for this Project, suggesting the species uses the area for foraging. However, there is no evidence to suggest it is present in sufficient numbers to change the status from VU to EN/CR should the population be lost. Nor is it sufficient to be deemed an important concentration of a regional EN listed species. Therefore, this species does not qualify as Critical Habitat. Nevertheless, this is a PBF species according to ESR6.
Birds									
Falco cherrug	Saker Falcon	EN	EN (Europe) EN (Romania)	Revised Annex 1 of Resolution 6 (Bern Convention)	Confirmed	ERM 2023a	Assessed against C1.a and C3.a of IFC PS6	Not CH (PS6 or ESR6) PBF PBF (ESR Criteria 2.b and 3.a)	This migratory raptor is globally EN with an extremely large EOO of 19,100,000 km2. It typically inhabits open grassy landscapes such as desert edge, semi-desert, steppes, agricultural and arid montane areas. The global population of the species is an estimated minimum of 12,200. An artificial nest was installed circa 10 years ago for another project and two individuals were observed according to 2022-2023 monitoring studies undertaken for this Project. The Avian EAAA overlaps 0.001% of the species' mapped range and the habitat in which it occurs is not present in the Avian EAAA, indicating that the EAAA does not qualify as Critical Habitat for this species. There is no indication or evidence that this migratory species is present, and lands, in the EAAA in

Scientific name	Common English name	Global RL status [1]	National / Regional RL status	EU Directives	Presence in EAAA [2]	Source for EAAA confirmation	Critical Habitat Criteria [3]	Conclusion [4]	Justification
									concentrations of at least 0.5% (under Criterion 1.a) of the global population (i.e. >61 individuals) or ≥1% (122 individuals) to meet the threshold of Criterion 3.1 at any point. Therefore, it does not qualify as CH under Criterion 1.a or 3.a of IFC PS6 and the equivalent criteria of EBRD ESR6. This species qualifies as a Priority Biodiversity Feature under EBRD ESR6.
Ciconia ciconia	White Stork	LC	LC (Europe), VU (Romania).	Annex I of Birds Directive Revised Annex I of Resolution 6	Confirmed	ERM 2022a ERM 2022b ERM 2023b GBIF	Assessed against C3.a of IFC PS6 and the equivalent criteria of EBRD ESR6	Not CH (PS6 or ESR6) PBF (ESR Criterion 4.a)	This globally LC bird is migratory. It has a very large range spanning Europe, Africa and parts of Asia, and has a large EOO of 52,700,000 km2. The global population is estimated at a minimum of 526,000 mature individuals. The species is a known resident within the study area, inhabiting open areas during winter it is known to prefer drier habitats such as grasslands, steppe, savanna and cultivated fields. The avian EAAA overlaps with 0.002% of the species' range. The August and November 2022 monitoring studies undertaken for this Project recorded 4,443 and 3,650 individuals on migration; this equates to 0.84% and 0.69% of the global population, therefore not meeting the threshold for IFC Criterion 3.a and ESR 4.a. This species qualifies as a Priority Biodiversity Feature under EBRD ESR6.

Scientific name	Common English name	Global RL status [1]	National / Regional RL status	EU Directives	Presence in EAAA [2]	Source for EAAA confirmation	Critical Habitat Criteria [3]	Conclusion [4]	Justification
Buteo buteo	Eurasian Buzzard	LC	LC (Europe)	Annex I of Birds Directive Revised Annex I of Resolution 6	Confirmed	ERM 2022a ERM 2022b ERM 2023b	Assessed against C3.a of IFC PS6 and the equivalent criteria of EBRD ESR6	Not CH (PS6 or EBRD) PBF (ESR Criteria 4.a)	This globally LC bird is migratory. It has a very large range spanning Eurasia and parts of Africa and has a large EOO of 33,500,000 km2. The global population is estimated at a minimum of 2,000,000 mature individuals. The avian EAAA overlaps with 0.003% of the species' range, and the species inhabits a wide variety of habitats. Although the species was recorded during the field surveys for this Project, it was in low numbers, with a peak recording of 67 flights from a vantage point. It is extremely unlikely that this migratory species is present, and lands, in the EAAA in concentrations of at least 1% of the global population (i.e. >20,000 individuals) at any point. Therefore, it does not qualify as CH under Criterion 3.a of IFC PS6 and the equivalent criteria of EBRD ESR6. This species qualifies as a Priority Biodiversity Feature under EBRD ESR6.
Falco tinnunculus	Common Kestrel	LC	LC (Europe)	N/A	Yes	ERM 2022a ERM 2022b ERM 2023b GBIF	Assessed against C3.a of IFC PS6 and equivalent criteria of EBRD ESR6	Not CH (PS6 or ESR6) PBF (ESR Criteria 4.a)	The Common Kestrel is globally LC with an extremely large range spanning Eurasia and parts of Africa. It tolerates a wide range of open and forested habitats. The species is a migrant, migrating from northern Europe to winter in sub-Saharan Africa. The estimated minimum global population is 4,300,000; during the January 2023 monitoring surveys for this Project, a total of 163 individuals were recorded, it is extremely unlikely

Scientific name	Common English name	Global RL status [1]	National / Regional RL status	EU Directives	Presence in EAAA [2]	Source for EAAA confirmation	Critical Habitat Criteria [3]	Conclusion [4]	Justification
									that this migratory species is present, and lands, in the EAAA in concentrations of at least 1% of the global population (i.e. >40,000 individuals) at any point. Therefore, it does not qualify as CH under Criterion 3.a of IFC PS6 and the equivalent criteria of EBRD ESR6. This species qualifies as a Priority Biodiversity Feature under EBRD ESR6.
Circus aeruginosus	Western Marsh-harrier	LC	LC (Europe)	Annex I of Birds Directive Revised Annex I of Resolution 6	Confirmed	ERM 2022a ERM 2022b ERM 2023b GBIF	Assessed against C3.a of IFC PS6 and equivalent criteria of EBRD ESR6	Not CH (PS6 or ESR6) PBF (ESR Criteria 4.a)	This raptor, classified as LC globally, is migratory; it breeds throughout Europe and Asia and travels during the winter to southern Europe and as far as sub-Saharan Africa. The estimated minimum global population is 631,000, with 49 recorded in November 2022. The species inhabits extensive areas of dense marsh vegetation, in fresh or brackish water, generally in lowlands. These habitats are not present in the Avian EAAA and although it was recorded during the November 2022 monitoring studies for this Project, there is no evidence to suggest that this migratory species is present in sufficient numbers to meet the thresholds of 1% of the global population (i.e. >6,310 individuals) at any point. Therefore, it does not qualify as CH under Criterion 3.a of IFC PS6 and the equivalent criteria of EBRD ESR6. This species qualifies as a Priority Biodiversity Feature under EBRD ESR6.

Scientific name	Common English name	Global RL status [1]	National / Regional RL status	EU Directives	Presence in EAAA [2]	Source for EAAA confirmation	Critical Habitat Criteria [3]	Conclusion [4]	Justification
Aquila heliaca	Eastern Imperial Eagle	VU	LC (Europe) CR (Romania)	EU Birds Directive Annex I	Confirmed	ERM 2022a ERM 2023b GBIF	Assessed against C1.b and C3.a of IFC PS6 and equivalent criteria of EBRD ESR6	Not CH (PS6 or ESR6) PBF (ESR Criteria 2.b and 4.a)	This globally VU migratory raptor has an estimated EOO of 12,700,000 km2. The minimum global population is estimated at 16,000 mature individuals. The avian EAAA overlaps with 0.006% of the global range and whilst it was recorded in low numbers during the monitoring studies for this Project, there is no evidence to suggest it is present in sufficient numbers to meet the thresholds of 1% of the global population (160 individuals) at any one time. Therefore, it does not qualify as CH under Criterion 3.a of IFC PS6 and the equivalent criteria of EBRD ESR6. This species qualifies as a Priority Biodiversity Feature under EBRD ESR6.
Aquila pomarina	Lesser Spotted Eagle	LC	LC (Europe)		Confirmed	ERM 2022a ERM 2022b ERM 2023b GBIF	Assessed against C3.a of IFC PS6 and equivalent criteria of EBRD ESR6	Unlikely CH (PS6 or ESR6) PBF (ESR Criterion 4.a)	This globally LC migratory raptor has an estimated EOO of 6,550,000 km2. The minimum global population is estimated at 40,000 mature individuals. It breeds near forest edges, preferring moist woodland; most nest in lowlands but it is recorded breeding up to 2,200 m in montane areas. The avian EAAA overlaps with 0.004% of the global range and whilst it was recorded in low numbers during the monitoring studies for this Project (245 in January 2023), there is no evidence to suggest it is present in sufficient numbers to meet the thresholds of 1% of the global population (400 individuals) at any one time.

Scientific name	Common English name	Global RL status [1]	National / Regional RL status	EU Directives	Presence in EAAA [2]	Source for EAAA confirmation	Critical Habitat Criteria [3]	Conclusion [4]	Justification
									Therefore, it does not qualify as CH under Criterion 3.a of IFC PS6 and the equivalent criteria of EBRD ESR6. This species qualifies as a Priority Biodiversity Feature under EBRD ESR6.
Circus pygargus	Montagu's Harrier	LC	LC (Europe) VU (Romania)	Revised Annex I of Resolution 6	Confirmed	ERM 2022a ERM 2022b ERM 2023b GBIF	Assessed against C.1b and C3.a of IFC PS6 and equivalent criteria of EBRD ESR6	Not CH (PS6 or EBRD) PBF (ESR Criteria 4.a)	This globally LC migratory raptor has an estimated EOO of 18,000,000km^2. The minimum global population is estimated at 300,000 mature individuals. It breeds near forest edges, preferring moist woodland; most nest in lowlands but it is recorded breeding up to 2,200 m in montane areas. The avian EAAA overlaps with 0.001% of the global range and it was recorded in low numbers during the monitoring studies (34 in November 2022). As such, there is no evidence to suggest it is present in sufficient numbers that if the population was lost, it's conservation status would change to EN/CR, nor to meet the thresholds of 1% of the global population (3,000 individuals) at any one time. Therefore, it does not qualify as CH under Criterion 1.b or 3.a of IFC PS6 and the equivalent criteria of EBRD ESR6. This species qualifies as a Priority Biodiversity Feature under EBRD ESR6.
Clanga clanga	Greater Spotted Eagle	VU	VU (Europe)	EU Birds Directive Annex I	Confirmed	DNV Italy (2026)	Assessed against C1.b and C3.a of IFC PS6 and	Unlikely CH (PS6 or ESR6)	The population in Europe is entirely migratory. The world population of this eagle was estimated at less than 4,000 breeding pairs. It occurs in lowland forests

Scientific name	Common English name	Global RL status [1]	National / Regional RL status	EU Directives	Presence in EAAA [2]	Source for EAAA confirmation	Critical Habitat Criteria [3]	Conclusion [4]	Justification
			EN (Romania)				equivalent criteria of EBRD ESR6	PBF (ESR Criteria 2.b and 4.a)	near wetlands, nesting in different types of (generally tall) trees, depending on local conditions. The avian EAAA overlaps with 0.001% of the global range and it was recorded in low numbers (1 individual in March-May) during the monitoring studies for this Project. As such there is no evidence to suggest it is present in sufficient numbers that if the population was lost, the conservation status would change to EN/CR, nor to meet the thresholds of 1% of the global population (40 individuals) at any one time. Therefore, it does not qualify as CH under Criterion 1.b or 3.a of IFC PS6 and the equivalent criteria of EBRD ESR6. This species qualifies as a Priority Biodiversity Feature under EBRD ESR6.
Falco vespertinus	Red-footed Falcon	VU	VU (Europe) VU (Romania)	EU Birds Directive Annex I Bern Convention Appendix II	Confirmed	ERM 2022a ERM 2022b ERM 2023b GBIF	Assessed against C1.b and C3.a of IFC PS6 and equivalent criteria of EBRD ESR6	Not CH (PS6 or ESR6) PBF (ESR Criteria 2.b and 4.a)	This globally VU raptor is migratory, with birds travelling great distances to their wintering grounds in southern Africa. The minimum global population is estimated at 287,500 mature individuals It breeds in open lowlands with trees and plenty of insects and small vertebrates, on which it feeds, including steppe and forest-steppe, open woodland, cultivation and pastureland with tall hedgerows or fringing trees, agricultural areas with shelterbelts. The avian EAAA overlaps with 0.001% of the global range and whilst it was recorded in low numbers during

Scientific name	Common English name	Global RL status [1]	National / Regional RL status	EU Directives	Presence in EAAA [2]	Source for EAAA confirmation	Critical Habitat Criteria [3]	Conclusion [4]	Justification
									the monitoring studies for this Project, there is no evidence to suggest it is present in sufficient numbers to meet the thresholds of 1% of the global population (2,875 individuals) at any one time, or the loss of such population would result in a change of the Red List status to EN or CR. Therefore, it does not qualify as CH under Criterion 1.b or 3.a of IFC PS6 and the equivalent criteria of EBRD ESR6. This species qualifies as a Priority Biodiversity Feature under EBRD ESR6.
Streptopelia turtur	European Turtle Dove	VU	VU (Europe)	EU Birds Directive Annex II	Confirmed	ERM 2022a ERM 2022b GBIF	Assessed against C1.b and C3.a of IFC PS6 and equivalent criteria of EBRD ESR6	Not CH (PS6 or EBRD) PBF (ESR Criteria 2.b and 4.a)	This globally VU species is a widespread migrant breeder across much of central and southern Europe. The species uses a wide variety of woodland types, as well as steppe and semi-desert, frequently relying on agricultural land for feeding. It may use hedges, borders of forest, groves, spinneys, coppices, young tree plantations, scrubby wasteland, woody marshes, scrub and garigue. It tolerates humans but does not breed close to towns or villages. The estimated minimum global population is 12,800,000 mature individuals. Although the species was recorded in low numbers during the monitoring studies for this Project, there is no evidence to suggest it is present in sufficient numbers to meet the thresholds of 1% of the global population (12,8000

Scientific name	Common English name	Global RL status [1]	National / Regional RL status	EU Directives	Presence in EAAA [2]	Source for EAAA confirmation	Critical Habitat Criteria [3]	Conclusion [4]	Justification
									individuals) at any one time, or the loss of such population would result in a change of the Red List status to EN or CR. Therefore, it does not qualify as CH under Criterion 1.b or 3.a of IFC PS6 and the equivalent criteria of EBRD ESR6. This species qualifies as a Priority Biodiversity Feature under EBRD ESR6.

Notes:

[1] **Red List (RL) status**: **CR** = Critically Endangered; **EN** = Endangered; **VU** = Vulnerable; **NT** = Near Threatened; **LC** = Least Concern; **DD** = Data Deficient; **NE** = Not Evaluated

[2] **Presence in EAAA**: **Confirmed** = presence confirmed through recent field surveys in the relevant EAAA; **Reported** = presence reported on publicly-available biodiversity databases (e.g., GBIF, eBird); **Unconfirmed**= presence unconfirmed but considered possible given the overlap between study area and species range and/or suitability of habitats; **Unlikely** = presence considered unlikely given the lack of suitable habitats or other evidence.

[3] A description of the IFC PS6 and EBRD ESR6 criteria is provided in Appendix 1.

[4] **Critical Habitat Result**: **Confirmed CH** = if data demonstrate exceedance of at least one threshold (e.g. numbers confirmed by field verification); **Likely CH** = if the range overlap, or other evidence (e.g. from publicly-available data or expert consultation), suggests the EAAA is likely to exceed at least one threshold, but where there is no direct field verification; **Possible CH** = if the range overlap is close to at least one threshold, or potential for the EAAA to have a higher proportion of the population than average (e.g. based on publicly-available data or expert consultation); **Unlikely CH** = if available evidence is that thresholds are unlikely to be exceeded; **Not CH** = if available evidence is that thresholds would not be exceeded.

3.2 Priority Biodiversity Features (PBFs)

A total of 134 species have been identified as PBFs for this Project, in alignment with EBRD ESR6 criteria (see Appendix 1). Based on the detailed screening and assessment described in Section 3.1, nineteen species were identified that, while not meeting the criteria for critical habitat, do qualify as PBFs. These consists of eleven bird species, one reptile species, and seven mammals. (Table 5).

As per the update of EBRD ESR6 in November 2025 and in particular, Criterion 4.a, all migratory species regularly occurring in the area of impact that are not CH-qualifying are classified as PBFs. One hundred and fifteen avian species have potential to use the airspace in the impact area of the Project and are likely to use the terrestrial habitats associated with the EAAA. Thus, the avian species migrating through the Project's Impact Area and using associated terrestrial habitats qualify as PBFs. Therefore, in addition to the 19 species detailed in Table 5, 115 avian species that qualify as PBFs are listed in Appendix 3. Therefore the total number of PBFs for the Project is 134[5].

Table 5. Species identified as Priority Biodiversity Features (PBFs) for the Project

Scientific name	Common name	Global RL status	Nat/reg RL status	PBF Criteria
Mammals				
Spermophilus citellus	European Ground Squirrel	EN	EN (Europe)	Species in the area of impact listed in Annex II of Habitats Directive, Annex I of Birds Directive or Resolution 6 of Bern Convention
				Species in the area of impact with IUCN global Red List status of VU, EN or CR
				Species in the area of impact with national or regional status of EN or CR
Cricetus cricetus	Common Hamster	CR	CR	Species in the area of impact with IUCN global Red List status of VU, EN or CR
Mesocricetus newtoni	Romanian Hamster	VU	VU (Europe)	Species in the area of impact with IUCN global Red List status of VU, EN or CR
				All range-restricted species in the area of impact

[5] N.B. All 11 avian species assessed in detail against the CH criteria and subsequently classified as PBFs as per Table 5, are migratory. These are not included in Appendix 3 to avoid double counting.

Scientific name	Common name	Global RL status	Nat/reg RL status	PBF Criteria
Reptiles				
Testudo graeca	Common Tortoise	VU	-	Species in the area of impact with IUCN global Red List status of VU, EN or CR
Birds				
Falco cherrug	Saker Falcon	EN	EN (Europe)	Species in the area of impact with IUCN global Red List status of VU, EN or CR
				Species in the area of impact with national or regional status of EN or CR
				All migratory species in the area of impact
Buteo buteo	Eurasian Buzzard	LC	LC	All migratory species in the area of impact
Ciconia ciconia	White Stork	LC	LC (Europe), VU (Romania).	All migratory species in the area of impact
Falco tinnunculus	Common Kestrel	LC	LC (Europe)	All migratory species in the area of impact
Circus aeruginosus	Western Marsh-harrier	LC	LC (Europe)	All migratory species in the area of impact
Aquila heliaca	Eastern Imperial Eagle	VU	LC (Europe)	Species in the area of impact with IUCN global Red List status of VU, EN or CR
Aquila pomarina	Lesser Spotted Eagle	LC	LC (Europe)	All migratory species in the area of impact
Circus pygargus	Montagu's Harrier	LC	EN (Romania)	All migratory species in the area of impact
Clanga clanga	Greater Spotted Eagle	VU	VU (Europe)	Species in the area of impact with IUCN global Red List status of VU, EN or CR
				All migratory species in the area of impact
Falco vespertinus	Red-footed Falcon	VU	VU (Europe VU (Romania)	Species in the area of impact with IUCN global Red List status of VU, EN or CR
				All migratory species in the area of impact
Streptopelia turtur	European Turtle Dove	VU	VU (Europe)	Species in the area of impact with IUCN global Red List status of VU, EN or CR

Scientific name	Common name	Global RL status	Nat/reg RL status	PBF Criteria
Bats				
Nyctalus lasiopterus	Giant Noctule	VU	VU (Europe)	Species in the area of impact with IUCN global Red List status of VU, EN or CR
Miniopterus schreibersii	Schreiber's Bent-winged Bat	VU	VU (Europe)	Species in the area of impact with IUCN global Red List status of VU, EN or CR
Myotis myotis	Greater Mouse-eared Bat	LC	LC (Europe)	Species in the area of impact listed in Annex II of Habitats Directive, Annex I of Birds Directive or Resolution 6 of Bern Convention
Rhinolophus ferrumequinum	Greater Horseshoe Bat	LC	LC (Europe)	Species in the area of impact listed in Annex II of Habitats Directive, Annex I of Birds Directive or Resolution 6 of Bern Convention

3.3 Highly Threatened or Unique Ecosystems

Critical habitat Criterion 4 of IFC PS6 and Criterion 1 of EBRD ESR6 relate to highly threatened and unique ecosystems. Romania does not have a national Red List of threatened ecosystems, and the IUCN Red List of Ecosystems[6] does not include any ecosystems which are located in Romania. Therefore, Critical Habitat criteria 4.a of IFC PS6 and 1.b of EBRD ESR6, relating to IUCN CR/EN ecosystems in the EAAAs, will not be triggered. However, portions of the EAAAs include the Natura 2000 protected area: ROSCI0071 Dumbrăveni - Valea Urluia - Lacul Vederoasa (SCI: Site of Community Importance) which is designated under the EU Habitats Directive and comprises the following EU priority habitat types:

- 62C0* Ponto-Sarmatic steppes with *Stipion lessingianae* plant associations
- 91I0* Euro-siberian forest-steppe with Quercus spp.
- 40C0* Ponto-Sarmatic deciduous thickets, with *Pruno spinosae-Crataegetum* plant associations

These priority habitats are listed in Annex I of the Habitat Directive (Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora). However, only one turbine is located within the Natura 2000 SCI mentioned above, and the turbine within the SCI is located on arable land of no conservation value.. However, the nature of a wind farm and the associated impacts on habitats and species present mean that these habitats are provisionally classified as

[6] IUCN Ecosystems

Likely Critical Habitat due to the fact they are listed as priority habitats in Annex I of the EU Habitats Directive. It is recommended that additional surveys are undertaken to understand the full extent and quality of these habitat types, and the potential impacts of the Project. Please see Section 5 for further information on recommendations.

3.4 Key Evolutionary Processes

The study area is not known to contain landscape feature and/or subpopulations of species with unique evolutionary history. In fact, the study area is not characterized by a particular level of isolation, spatial heterogeneity, and wealth of environmental gradients or edaphic interfaces. Moreover, the area is not considered to be of demonstrated importance as to climate change adaptation or as biological corridor. These considerations suggest that the study area does not support any key evolutionary processes.

Therefore, no Critical Habitat is expected to be present in the Project area according to this criterion of IFC PS6.

3.5 Natural and modified habitat

The land use/habitat mapping (Figure 2) shows that much of the area within the Terrestrial EAAA is considered to be modified under agricultural activity. Table 6 presents a breakdown of the landcover classes within the two EAAAs. CORINE Land Cover is a standardised, pan European land cover and land use dataset, featuring 44 land cover classes, mapping land based on its physical land cover and functional land use.

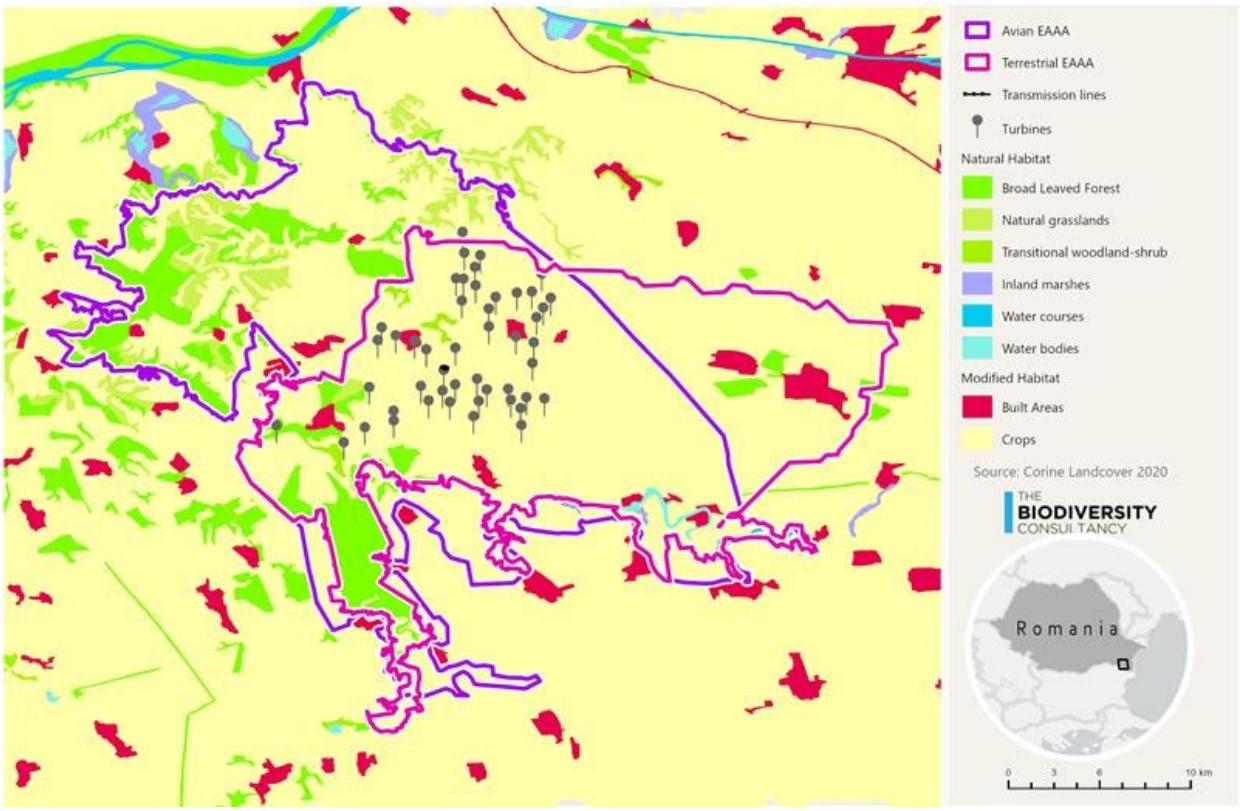

Figure 2. Map of land cover, including natural and modified habitats, across the EAAAs.

Although the Terrestrial EAAA overlaps with a Natura 2000 site supporting Annex I priority habitats, all the turbines are located within areas of agricultural land. It is important to note that the Terrestrial EAAA is substantially larger than the Project area and the areas of natural habitat are on the periphery of the Project area. In addition, where the Project footprint does overlap with the Natura 2000 site, it does so only on cultivated fields and not on the qualifying Annex I priority habitats.

The small areas of Natural Habitat occurring in both the Terrestrial EAAA and the wider Project area are not impacted by the Project.

Table 6: Land cover for the Terrestrial EAAA and Avian EAAA based on Corine Land Cover Classes.

CORINE Land Cover (CLC) Level 1	CLC Sub Class Level 3	Description	Area within Terrestrial EAAA (km^2 / %)	Area within Avian EAAA (km^2 / %)
Natural Habitat (including semi-natural habitat):				
Forest and semi natural areas	Broad-leaved forest	Vegetation formation composed principally of trees, including shrub and bush understorey, where broad-leaved species predominate.	36.07 km^2 / 9.09%	81.18 km^2 / 14.93 %

CORINE Land Cover (CLC) Level 1	CLC Sub Class Level 3	Description	Area within Terrestrial EAAA (km^2 / %)	Area within Avian EAAA (km^2 / %)
	Transitional woodland shrub	Transitional bushy and herbaceous vegetation with occasional scattered trees. Can represent woodland degradation, forest regeneration / recolonization or natural succession.	2.91 km^2 / 0.73%	2.91 km^2 / 0.53%
	Natural Grasslands	Grasslands under no or moderate human influence. Low productivity grasslands. Often situated in areas of rough, uneven ground, steep slopes; frequently including rocky areas or patches of other (semi-)natural vegetation.	1.11 km^2 / 0.28%	24.71 km^2 / 4.54%
Waterbodies	Water bodies	Natural or artificial water bodies with presence of standing water surface during most of the year.	2.21 km^2 / 0.73%	2.29 km^2 / 0.42%
	Water courses	Natural or artificial water-courses serving as water drainage channels. Includes canals. Minimum width for inclusion: 100 m.	1.25 km^2 / 0.31%	1.19 km^2 / 0.22%
Wetlands	Inland Marshes	Low-lying land usually flooded in winter, and with ground more or less saturated by fresh water all year round.	0.3 km^2 / 0.08%	0.57 km^2 / 0.10%
Total Natural Habitat			**14.62 km^2 / 11.05%**	**112.84 km^2 / 20.76%**
Modified Habitat:				
Agricultural areas	Crops	Land primarily used for crop production and livestock grazing.	338.03 km^2 / 85.17%	419.53 km^2 / 77.17%
Artificial Surfaces	Built Areas	Areas where the natural land cover has been replaced or heavily modified by human construction.	15 km^2 / 3.78%	11.27 km^2 / 2.07%
Total Modified Habitat			**353.02 km^2 / 88.95%**	**430.81 km^2 / 79.24%**

4 Legally Protected Areas and Internationally Recognised Areas

The Project has a marginal overlap with two Natura 2000 designated sites[7]:

[7] https://www.eea.europa.eu/en/datahub/datahubitem-view/6fc8ad2d-195d-40f4-bdec-576e7d1268e4

- ROSCI0353 Pestera – Deleni Natural Area and;
- ROSCI0071 Dumbraveni – Valea Urluia Natural Area - Lacul Vederoasa

One turbine is located in each SCI, though both are sited in arable land of no conservation importance. In addition, the Project is in close proximity to another Natura 2000 site, Aliman – Adamclisi Special Protection Area (SPA) (ROSPA0001) (Figure 3). The three sites are summarised below.

A detailed description of these sites is presented in the Appropriate Assessment for this Project (AON, 2025a). The Project is also in close proximity to two legacy KBA sites which were used to define the EAAAs, shown in Figure 4.

Aliman – Adamclisi Special Protection Area (SPA) (ROSPA0001[8])

This Natura 2000 site is designated under the European Union (EU) Birds Directive, as it protects 62 species of birds from the above directive. The site also supports 17 species of rare plants and rare species of mammals and herpetofauna. This area is also recognised as a Key Biodiversity Area[9] (KBA) and Important Bird Area[10] (IBA). The site comprises a mosaic of habitats dominated by arable areas and steppe grasslands interspersed with scattered patches of shale forest.

It does not have a IUCN management category and it is designated at a regional level. The management authority is the Agentia Nationala pentru Mediu si Arii Protejate (ANMAP)[11]. A management plan has been prepared for several Natura 2000 sites including this one.

Dumbrăveni - Valea Urluia - Lacul Vederoasa Site of Community Importance (SCI) (ROSCI0071[12])

This site is designated under the Habitats Directive, as it protects 23 non-bird species (including mammals, reptiles, amphibians, fish and terrestrial invertebrates) and eight habitat types from the Habitats Directive. This includes the Annex I priority habitats Ponto-Sarmatic steppes (62C0), Euro-Siberian forest-steppe with Quercus spp. (91I0) and Ponto-Sarmatic scrub (40C0). Fifty-eight species of rare plants protected at national level have been recorded on this site.

[8] https://eunis.eea.europa.eu/sites/ROSPA0001

[9] https://www.keybiodiversityareas.org/site/factsheet/24436

[10] https://datazone.birdlife.org/site/factsheet/24436-aliman-adamclisi

[11] https://www.protectedplanet.net/555540926

[12] https://eunis.eea.europa.eu/sites/ROSCI0071

It does not have a IUCN management category and it is designated at a regional level. The management authority is the Agentia Nationala pentru Mediu si Arii Protejate [13]. A management plan has been prepared for several Natura 2000 sites including this one.

Peștera - Deleni SCI (ROSCI0353[14])

This site is designated under the Habitats Directive, as it protects two mammal species of the EU nature directives (*Mesocricetus newtoni* and *Spermophilus citellus*). It does not have an IUCN management category and it is designated at a regional level. The management authority is the Agentia Nationala pentru Mediu si Arii Protejate [15], but no management plan is in place.

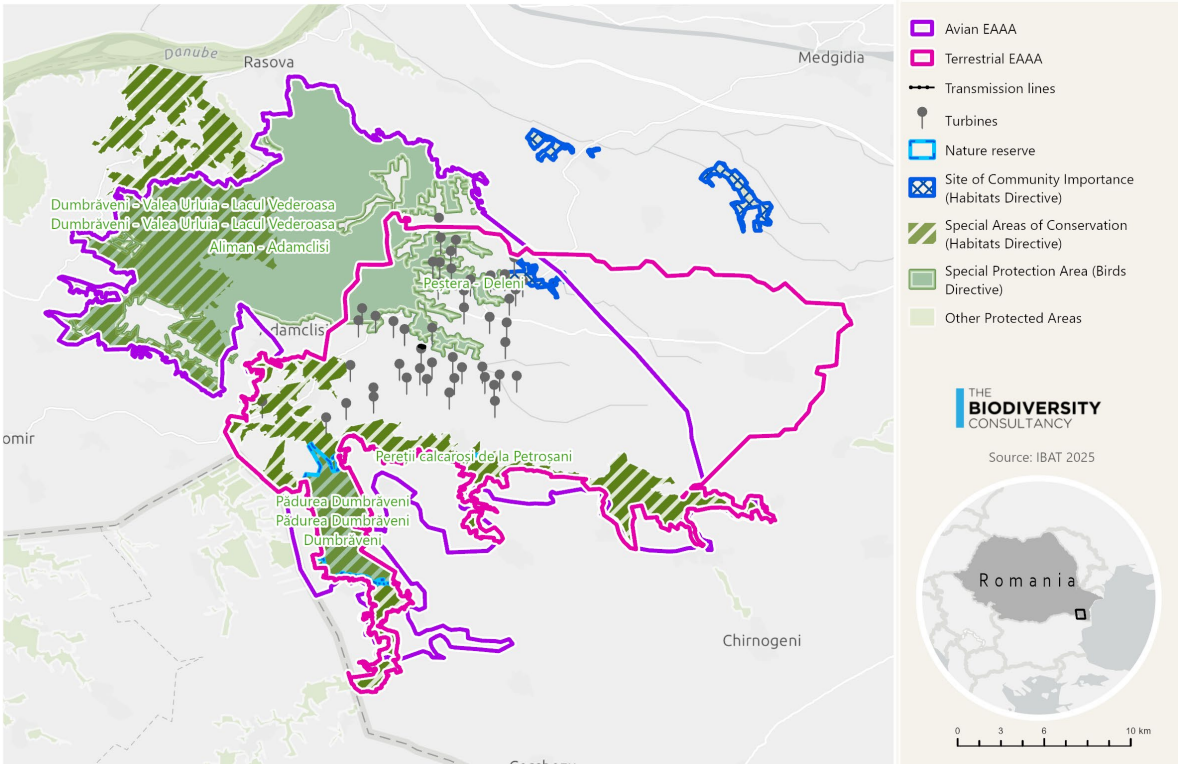

Figure 3 Project Area in relation to Natura 2000 and Other Protected Areas

[13] https://www.protectedplanet.net/555789420

[14] https://eunis.eea.europa.eu/sites/ROSCI0353

[15] https://www.protectedplanet.net/555578992

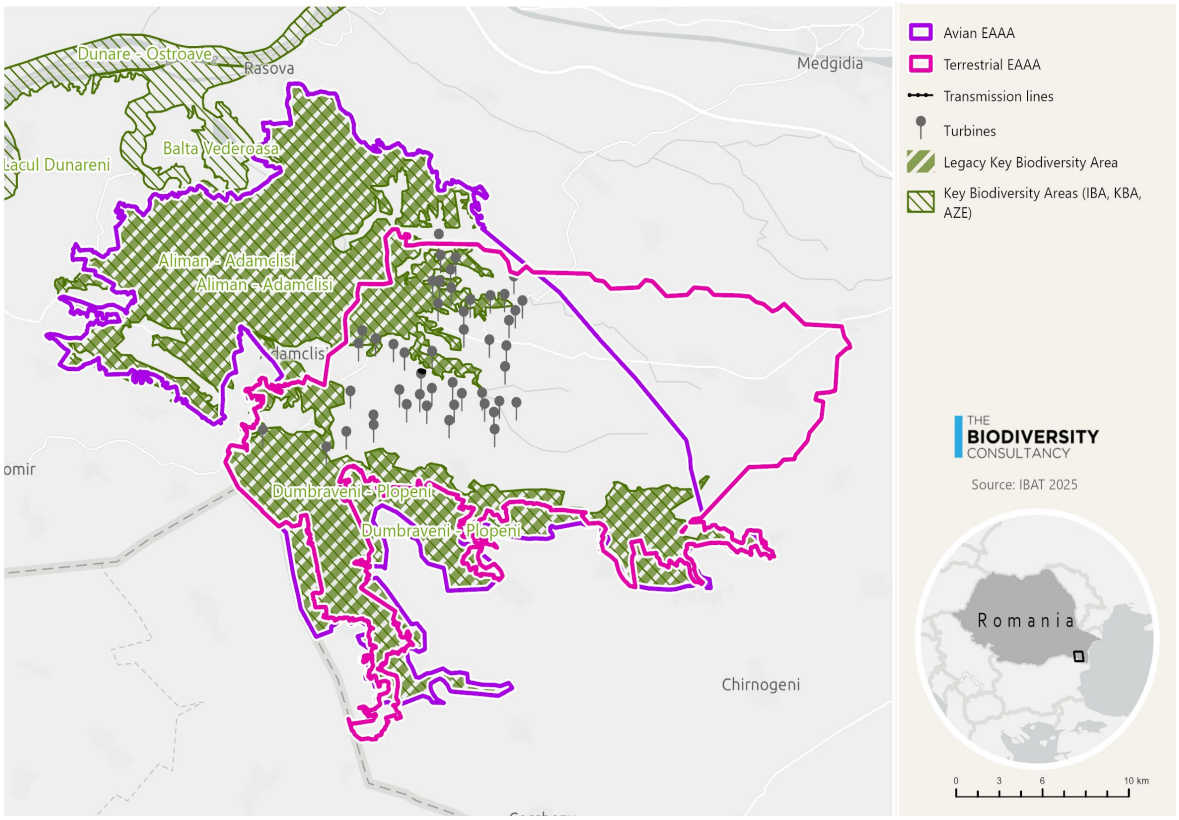

Figure 4 Project Area and Legacy Key Biodiversity Areas

5 Conclusion and recommendations

This assessment finds that the Project is located in areas of largely modified habitat, but the EAAAs include small areas of Critical Natural Habitat as follows:

- Three habitats qualify as Critical Habitat under EBRD ESR6 due to being listed as priority habitats in Annex I of the EU Habitats Directive:
  - 62C0* Ponto-Sarmatic steppes with *Stipion lessingianae* plant associations
  - 91I0* Euro-siberian forest-steppe with Quercus spp.
  - 40C0* Ponto-Sarmatic deciduous thickets, with *Pruno spinosae-Crataegetum* plant associations

The surveys to date have been conducted to inform the ESIA and Appropriate Assessment, but are limited, specifically in relation to the extent and condition the three priority habitats mentioned above.. We therefore recommend targeted habitat surveys to confirm distribution and quality of the three priority habitats listed above, in order to fully understand the extent and magnitude of potential Project impacts and inform mitigation.

For PBFs identified by the Project, the requirements of EBRD ESR6 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

Additionally, a pre-construction walk-over assessment should be conducted 2-3 months prior to construction, by suitably trained and qualified biodiversity specialists with local experience. This should focus on identifying PBFs as per this CHA.

The Project is in an area of largely modified habitat but the EAAAs do support small areas of natural habitat that qualifies as Critical Habitat. It also supports a large number of PBFs. Therefore, the development of a Biodiversity Action Plan (BAP) is necessary to ensure that Net Gain and No Net Loss are achieved for the relevant biodiversity values, in line with IFC PS6 and EBRD ESR6.

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Appendix 1 Critical habitat criteria and thresholds

Table A1. Lenders' criteria and thresholds for Critical Habitat used for this Critical Habitat Assessment (CHA), according to IFC PS6[16] and EBRD ESR6[17].

	IFC PS6	EBRD ESR6
Globally and regionally threatened species		
Criteria	**Criterion 1:** Species threatened with global extinction and listed as CR and EN on the IUCN Red List of Threatened Species Species that are listed nationally/regionally as CR or EN in countries that adhere to IUCN guidance shall be determined on a project-by-project basis	**Criterion 2:** Threatened species (a) Species and their habitats listed in EU Habitats Directive and Birds Directive (EU members only) or Bern Convention (signatory nations only) (b) IUCN Red List EN or CR species (c) IUCN Red List VU species (d) Nationally or regionally (for example, Europe) listed EN or CR species
Critical Habitat Thresholds	(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 Vulnerable (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 important concentrations of a nationally or regionally listed EN or CR species	(a) EAAA for species and their habitats listed in Annex IV of the Habitats Directive (see EU restrictions) (b) EAAA supports ≥ 0.5 per cent of the global population AND ≥ 5 reproductive units of a CR or EN species (c) EAAA supports globally significant population of VU species necessary to prevent a change of IUCN Red List status to EN or CR, and satisfies threshold (b) (d) EAAA for important concentrations of a nationally or regionally listed EN or CR species
Priority Feature Threshold	-	(a) EAAA for species and their habitats listed in Annex II of Habitats Directive, Annex I of Birds Directive, or Resolution 6 of Bern Convention (b) EAAA supports < 0.5 per cent of global population OR < 5 reproductive units of a CR or EN species. (c) EAAA supports VU species

[16] (IFC 2019)

[17] (EBRD 2023)

	IFC PS6	EBRD ESR6
		(d) EAAA for regularly occurring nationally or regionally listed EN or CR species
Endemic and restricted range species		
Criteria	**Criterion 2:** For terrestrial vertebrates and plants, restricted-range species are defined as those species that have an Extent of occurrence (EOO) less than 50,000 square kilometers (km^2). For marine systems, restricted-range species are provisionally being considered those with an EOO of less than 100,000 km^2. For coastal, riverine, and other aquatic species in habitats that do not exceed 200 km width at any point (for example, rivers), restricted range is defined as having a global range of less than or equal to 500 km linear geographic span (i.e., the distance between occupied locations furthest apart).	**Criterion 2:** Range-restricted species
Critical Habitat Thresholds	Areas that regularly hold ≥10% of the global population size AND ≥10 reproductive units (the minimum number and combination of mature individuals necessary to trigger a successful reproductive event) of a species.	(a) EAAA regularly holds ≥ 10 per cent of global population AND ≥ 10 reproductive units of the species
Priority Feature Threshold	-	(a) EAAA for regularly occurring range restricted species
Migratory and congregatory species		
Criteria	**Criterion 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 Congregatory species are defined as species whose individuals gather in large groups on a cyclical or otherwise regular and/or predictable basis.	**Criterion 2:** Migratory and congregatory species
Critical Habitat Thresholds	(a) Areas known to sustain, on a cyclical or otherwise regular basis, ≥ 1 percent of the global population of a migratory or congregatory species at any point of the species' lifecycle (b) Areas that predictably support ≥10 percent of the global population of a species during periods of environmental stress	(a) EAAA sustains, on a cyclical or otherwise regular basis, ≥ 1 per cent of the global population at any point of the species' lifecycle (b) EAAA predictably supports ≥ 10 per cent of global population during periods of environmental stress

	IFC PS6	EBRD ESR6
Priority Feature Threshold	-	(a) EAAA identified, as per recognised national or international process, as important for migratory birds (especially wetlands)
Highly Threatened or Unique Ecosystems		
Criteria	**Criterion 4:** The IUCN is developing a Red List of Ecosystems, this should be used where formal IUCN assessments have been performed. Where formal IUCN assessments have not been performed, make assessments using systematic methods at the national/regional level.	**Criterion 1:** (a) Habitats listed in Annex 1 of EU Habitats Directive (EU members only) or Resolution 4 of Bern Convention (signatory nations only) (b) IUCN Red List EN or CR ecosystems (c) Ecosystems/habitats listed in national systematic conservation planning
Critical Habitat Thresholds	a) Areas representing ≥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.	(a) Habitat type listed in Annex 1 of EU Habitats Directive marked as "priority habitat type" (b) EAAA ≥ 5 per cent of global extent of an ecosystem type with IUCN status of CR or EN (c) EAAA is ecosystem determined to be of high priority for conservation by national systematic conservation planning
Priority Feature Threshold	-	(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
Key Evolutionary Processes		
Criteria	**Criterion 5:** The structural attributes of a region can influence the evolutionary processes that give rise to regional configurations of species and ecological properties. For illustrative purposes, some potential examples of spatial features associated with evolutionary processes are as follows: • Landscapes with high spatial *heterogeneity*. • *Environmental gradients*, also known as *ecotones*. • *Edaphic interfaces* are specific juxtapositions of soil types (for example, serpentine outcrops, limestone, and gypsum deposits). • *Connectivity* between habitats (for example, biological corridors). • Sites of demonstrated importance to *climate change adaptation* for either species or ecosystems are also included within this criterion.	

	IFC PS6	EBRD ESR6
Critical Habitat Thresholds	The significance of structural attributes in a landscape that may influence evolutionary processes will be determined on a case-by-case basis, and the determination of Critical Habitat will be heavily reliant on scientific knowledge.	Expert Judgement required, no fixed thresholds
Priority Feature Threshold		Expert Judgement required, no fixed thresholds

Internationally recognized areas

IFC PS6 Guidance Note (GN) 54 (IFC 2019) also states that certain internationally recognized areas of high biodiversity value may be recognized as Critical Habitat and should be given special attention during assessments. Examples include the following:

- Areas that meet the criteria of the IUCN's Protected Areas Categories Ia, Ib and II (Dudley 2008);
- Key Biodiversity Areas (KBAs), which encompass Important Bird and Biodiversity Areas (IBAs)

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Appendix 2 Species screened as part of the CHA

Table A2. A subset of species initially considered for Critical Habitat screening within the relevant EAAA boundary derived from the IUCN Red List of Threatened Species spatial data accessed via IBAT, and supplemented with species recorded during Project surveys. Least Concern and Near Threatened species (that are not nationally or regionally EN/CR) are not shown although were assessed for C2. Species without evidence of migration on the IUCN Red List are not shown.

Scientific Name	Common Name	Class	IUCN Red List Category	Reg/Nat Red List Category	Migratory
Accipiter brevipes	Levant Sparrowhawk	AVES	LC	-	Full Migrant
Accipiter nisus	Eurasian Sparrowhawk	AVES	LC	-	Full Migrant
Acrocephalus melanopogon	Moustached Warbler	AVES	LC	NT	Full Migrant
Acrocephalus palustris	Marsh Warbler	AVES	LC	-	Full Migrant
Acrocephalus scirpaceus	Common Reed-warbler	AVES	LC	LC	Full Migrant
Alauda arvensis	Eurasian Skylark	AVES	LC	-	Full Migrant
Alcedo atthis	Common Kingfisher	AVES	LC	NT	Full Migrant
Anas crecca	Common Teal	AVES	LC	-	Full Migrant
Anthropoides virgo	Demoiselle Crane	AVES	LC	-	Full Migrant
Anthus campestris	Tawny Pipit	AVES	LC	LC	Full Migrant
Anthus pratensis	Meadow Pipit	AVES	LC	-	Full Migrant
Anthus spinoletta	Water Pipit	AVES	LC	-	Full Migrant
Anthus trivialis	Tree Pipit	AVES	LC	-	Full Migrant
Aquila chrysaetos	Golden Eagle	AVES	LC	VU	Full Migrant
Ardea alba	Great White Egret	AVES	LC	-	Full Migrant
Ardea cinerea	Grey Heron	AVES	LC	NT	Full Migrant
Ardea purpurea	Purple Heron	AVES	LC	NT	Full Migrant
Ardeola ralloides	Squacco Heron	AVES	LC	LC	Full Migrant
Arenaria interpres	Ruddy Turnstone	AVES	NT	-	Full Migrant
Aythya ferina	Common Pochard	AVES	NT	VU	Full Migrant
Asio flammeus	Short-eared Owl	AVES	LC	NT	Full Migrant
Burhinus oedicnemus	Eurasian Thick-knee	AVES	LC	LC	Full Migrant
Buteo rufinus	Long-legged Buzzard	AVES	LC	LC	Full Migrant
Branta ruficollis	Red-breasted goose	AVES	LC	VU	Full Migrant
Calandrella brachydactyla	Greater Short-toed Lark	AVES	LC	LC	Full Migrant
Calidris alba	Sanderling	AVES	LC	LC	Full Migrant
Calidris alpina	Dunlin	AVES	NT	-	Full Migrant
Calidris canutus	Red Knot	AVES	NT	-	Full Migrant
Calidris falcinellus	Broad-billed Sandpiper	AVES	VU	-	Full Migrant
Calidris ferruginea	Curlew Sandpiper	AVES	VU	-	Full Migrant
Carduelis carduelis	European Goldfinch	AVES	LC	EN	Full Migrant
Cecropis daurica	Red-rumped Swallow	AVES	LC	LC	Full Migrant
Cercotrichas galactotes	Rufous-tailed Scrub-robin	AVES	LC	-	Full Migrant

Scientific Name	Common Name	Class	IUCN Red List Category	Reg/Nat Red List Category	Migratory
Charadrius alexandrinus	Kentish Plover	AVES	LC	VU	Full Migrant
Chlidonias niger	Black Tern	AVES	LC	VU	Full Migrant
Chlidonias niger	White-winged Tern	AVES	LC	VU	Full Migrant
Chloris chloris	European Greenfinch	AVES	LC	-	Full Migrant
Ciconia ciconia	White Stork	AVES	LC	NT	Full Migrant
Ciconia nigra	Black Stork	AVES	LC	-	Full Migrant
Circaetus gallicus	Short-toed Snake-eagle	AVES	LC	VU	Full Migrant
Circus aeruginosus	Western Marsh-harrier	AVES	LC	NT	Full Migrant
Circus cyaneus	Hen Harrier	AVES	LC	-	Full Migrant
Circus macrourus	Pallid Harrier	AVES	NT	-	Full Migrant
Circus pygargus	Montagu's Harrier	AVES	LC	-	Full Migrant
Clanga clanga	Greater Spotted Eagle	AVES	VU	-	Full Migrant
Clanga pomarina	Lesser Spotted Eagle	AVES	LC	-	Full Migrant
Coccothraustes coccothraustes	Hawfinch	AVES	LC	-	Full Migrant
Columba livia	Rock Dove	AVES	LC	-	Full Migrant
Coracias garrulus	European Roller	AVES	LC	NT	Full Migrant
Corvus corone	Carrion Crow	AVES	LC	LC	Full Migrant
Corvus monedula	Eurasian Jackdaw	AVES	LC	LC	Full Migrant
Coturnix coturnix	Common Quail	AVES	LC	LC	Full Migrant
Cuculus canorus	Common Cuckoo	AVES	LC	NT	Full Migrant
Curruca cantillans	Subalpine Warbler	AVES	LC	-	Full Migrant
Curruca communis	Common Whitethroat	AVES	LC	-	Full Migrant
Curruca conspicillata	Spectacled Warbler	AVES	LC	-	Full Migrant
Curruca curruca	Lesser Whitethroat	AVES	LC	LC	Full Migrant
Crex crex	Corncrake	AVES	LC	VU	Full Migrant
Egretta garzetta	Little Egret	AVES	LC	LC	Full Migrant
Emberiza calandra	Corn Bunting	AVES	LC	LC	Full Migrant
Emberiza cia	Rock Bunting	AVES	LC	LC	Full Migrant
Emberiza cirlus	Cirl Bunting	AVES	NT	LC	Not a Migrant
Emberiza citrinella	Yellowhammer	AVES	LC	-	Full Migrant
Erithacus rubecula	European Robin	AVES	LC	-	Full Migrant
Falco columbarius	Merlin	AVES	LC	-	Full Migrant
Falco peregrinus	Peregrine Falcon	AVES	LC	EN	Full Migrant
Falco subbuteo	Eurasian Hobby	AVES	LC	-	Full Migrant
Ficedula albicollis	Collared Flycatcher	AVES	LC	-	Full Migrant
Ficedula parva	Red-breasted Flycatcher	AVES	LC	-	Full Migrant
Fringilla montifringilla	Brambling	AVES	LC	-	Full Migrant
Fulica atra	Eurasian Coot	AVES	LC	LC	Full Migrant
Galerida cristata	Crested Lark	AVES	LC	LC	Full Migrant
Gallinago gallinago	Common Snipe	AVES	LC	VU	Full Migrant
Glareola pratincola	Collared Pratincole	AVES	LC	VU	Full Migrant
Hieraaetus pennatus	Booted Eagle	AVES	LC	-	Full Migrant

Scientific Name	Common Name	Class	IUCN Red List Category	Reg/Nat Red List Category	Migratory
Himantopus himantopus	Black-winged Stilt	AVES	LC	LC	Full Migrant
Hirundo rustica	Barn Swallow	AVES	LC	-	Full Migrant
Iduna pallida	Eastern Olivaceous Warbler	AVES	LC	-	Full Migrant
Ixobrychus minutus	Common Little Bittern	AVES	LC	LC	Full Migrant
Lanius minor	Lesser Grey Shrike	AVES	LC	VU	Full Migrant
Larus armenicus	Armenian Gull	AVES	LC	-	Full Migrant
Larus cachinnans	Caspian Gull	AVES	LC	-	Full Migrant
Larus canus	Mew Gull	AVES	LC	-	Full Migrant
Larus fuscus	Lesser Black-backed Gull	AVES	LC	-	Full Migrant
Larus genei	Slender-billed Gull	AVES	LC	LC	Full Migrant
Larus ichthyaetus	Pallas's Gull	AVES	LC	EN-	Full Migrant
Larus melanocephalus	Mediterranean Gull	AVES	LC	EN	Full Migrant
Larus ridibundus	Black-headed Gull	AVES	LC	-	Full Migrant
Limosa limosa	Black-tailed Godwit	AVES	NT	VU	Full Migrant
Linaria cannabina	Common Linnet	AVES	LC	VU	Full Migrant
Locustella fluviatilis	River Warbler	AVES	LC	-	Full Migrant
Lullula arborea	Woodlark	AVES	LC	LC	Full Migrant
Luscinia svecica	Bluethroat	AVES	LC	-	Full Migrant
Melanocorypha calandra	Calandra Lark	AVES	LC	EN	Full Migrant
Merops apiaster	European Bee-eater	AVES	LC	-	Full Migrant
Milvus migrans	Black Kite	AVES	LC	CR	Full Migrant
Motacilla alba	White Wagtail	AVES	LC	-	Full Migrant
Motacilla cinerea	Grey Wagtail	AVES	LC	NT	Full Migrant
Motacilla flava	Western Yellow Wagtail	AVES	LC	-	Full Migrant
Muscicapa striata	Spotted Flycatcher	AVES	LC	LC	Full Migrant
Neophron percnopterus	Egyptian Vulture	AVES	EN	VU	Full Migrant
Numenius arquata	Eurasian Curlew	AVES	NT	-	Full Migrant
Oenanthe cypriaca	Cyprus Wheatear	AVES	LC	-	Full Migrant
Oenanthe deserti	Desert Wheatear	AVES	LC	LC	Full Migrant
Oenanthe finschii	Finsch's Wheatear	AVES	LC	LC	Full Migrant
Oenanthe hispanica	Black-eared Wheatear	AVES	LC	EN	Full Migrant
Oenanthe oenanthe	Northern Wheatear	AVES	LC	LC	Full Migrant
Otis tarda	Great Bustard	LC	LC	CR	Full Migrant
Otus scops	Eurasian Scops-owl	AVES	LC	LC	Full Migrant
Oxyura leucocephala	White-headed Duck	AVES	EN	EN	Full Migrant
Pandion haliaetus	Osprey	AVES	LC	LC	Full Migrant
Passer hispaniolensis	Spanish Sparrow	AVES	LC	LC	Full Migrant
Passer montanus	Eurasian Tree Sparrow	AVES	LC	LC	Full Migrant
Pelecanus onocrotalus	Great White Pelican	AVES	LC	-VU	Full Migrant
Pelecanus crispus	Dalmatian Pelican	AVES	LC	-VU	Full Migrant
Pernis apivorus	European Honey-buzzard	AVES	LC	-	Full Migrant
Phoenicurus ochruros	Black Redstart	AVES	LC	NT	Full Migrant

Scientific Name	Common Name	Class	IUCN Red List Category	Reg/Nat Red List Category	Migratory
Phoenicurus phoenicurus	Common Redstart	AVES	LC	NT	Full Migrant
Phylloscopus collybita	Common Chiffchaff	AVES	LC	-	Full Migrant
Phylloscopus trochilus	Willow Warbler	AVES	LC	-	Full Migrant
Pluvialis apricaria	Eurasian Golden Plover	AVES	LC		Full Migrant
Pluvialis squatarola	Grey Plover	AVES	VU	-	Full Migrant
Prunella modularis	Dunnock	AVES	LC	-	Full Migrant
Ptyonoprogne rupestris	Eurasian Crag Martin	AVES	LC	LC	Full Migrant
Ramphocoris clotbey	Thick-billed Lark	AVES	LC	-	Nomadic
Recurvirostra avosetta	Pied Avocet	AVES	LC	NT	Full Migrant
Remiz pendulinus	Eurasian Penduline-tit	AVES	LC	DD	Full Migrant
Saxicola rubetra	Whinchat	AVES	LC	-	Full Migrant
Saxicola torquatus	Common Stonechat	AVES	LC	LC	Full Migrant
Sturnus vulgaris	Common Starling	AVES	LC	LC	Full Migrant
Sylvia atricapilla	Eurasian Blackcap	AVES	LC	LC	Full Migrant
Sylvia borin	Garden Warbler	AVES	LC	-	Full Migrant
Tachymarptis melba	Alpine Swift	AVES	LC	LC	Full Migrant
Tetrax tetrax	Little Bustard	AVES	NT	-	Full Migrant
Thalasseus sandvicensis	Sandwich Tern	AVES	LC	LC	Full Migrant
Tringa totanus	Common Redshank	AVES	LC	-	Full Migrant
Troglodytes troglodytes	Northern Wren	AVES	LC	LC	Full Migrant
Turdus iliacus	Redwing	AVES	NT	-	Full Migrant
Turdus merula	Eurasian Blackbird	AVES	LC	LC	Full Migrant
Turdus philomelos	Song Thrush	AVES	LC	-	Full Migrant
Vanellus vanellus	Northern Lapwing	AVES	LC	VU	
Zapornia pusilla	Baillon's Crake	AVES	LC	VU	Full Migrant
Ammobates melectoides		INSECTA	EN	-	
Bradyporus macrogaster	Big-Bellied Glandular Bush-Cricket	INSECTA	EN	-	Not a Migrant
Ampedus quadrisignatus		INSECTA	EN		
Limoniscus violaceus	Violet Click Beetle	INSECTA	EN	-	
Ropalopus ungaricus		INSECTA	VU	-	
Anisarthron barbipes		INSECTA	VU	-	
Bradyporus macrogaster	Big-Bellied Glandular Bush-Cricket	INSECTA	EN	-	Not a Migrant
Crepidophorus mutilatus		INSECTA	VU	-	
Zeuneriana amplipennis	Danube Wide-winged Bush-cricket	INSECTA	EN	-	
Rhinolophus euryale	Mediterranean Horseshoe Bat	MAMMALIA	NT	EN	
Rhinolophus ferrumequinum	Greater Horseshoe Bat	MAMMALIA	LC	EN	
Rhinopoma microphyllum	Greater Mouse-tailed Bat	MAMMALIA	LC	EN	Full Migrant
Nyctalus leisleri	Leisler's Bat	MAMMALIA	LC		
Myotis brandtii	Brandt's Bat	MAMMALIA	LC		
Pipistrellus nathusii	Nathusius' Pipistrelle	MAMMALIA	LC		

Scientific Name	Common Name	Class	IUCN Red List Category	Reg/Nat Red List Category	Migratory
Myotis daubentoniid	Daubenton's Bat	MAMMALIA	LC		
Nyctalus noctule	Common Noctule	MAMMALIA	LC		
Pipistrellus pipistrellus	Common Pipistrelle	MAMMALIA	LC		
Vespertilio murinus	Parti-coloured Bat	MAMMALIA	LC		
Eptesicus serotinus	Serotine	MAMMALIA	LC		
Vormela peregusna	Marbled Polecat	MAMMALIA	VU	VU	
Neotinea tridentata	three-toothed orchid	Plantae	LC	VU	
Orchis morio	Green winged orchid	Plantae	NT	VU	
Paliurus spina-christi		Plantae	NE	VU	
Silene exaltata		Plantae	NE		
Echinops ritro	Globe thistle	Plantae	NE	Rare	
Caragana frutex	Siberian pea shrub	Plantae	NE	Rare	
Centaurea thirkei		Plantae	NE	Rare	
Minuartia mesogitana subsp. bilykiana		Plantae	NE	Rare	

Appendix 3 Migratory Bird Species Qualifying as PBFs under EBRD ESR6

Scientific name	Common name	Global RL status	PBF Criteria
Emberiza melanocephala	Black-headed Bunting	LC	All migratory species in the area of impact
Regulus ignicapilla	Common Firecrest	LC	All migratory species in the area of impact
Milvus milvus	Red Kite	LC	All migratory species in the area of impact
Phylloscopus orientalis	Eastern Bonelli's Warbler	LC	All migratory species in the area of impact
Melanocorypha calandra	Calandra Lark	LC	All migratory species in the area of impact
Accipiter brevipes	Levant Sparrowhawk	LC	All migratory species in the area of impact
Acrocephalus melanopogon	Moustached Warbler	LC	All migratory species in the area of impact
Lullula arborea	Woodlark	LC	All migratory species in the area of impact
Prunella modularis	Dunnock	LC	All migratory species in the area of impact
Lanius minor	Lesser Grey Shrike	LC	All migratory species in the area of impact
Emberiza hortulana	Ortolan Bunting	LC	All migratory species in the area of impact
Chloris chloris	European Greenfinch	LC	All migratory species in the area of impact
Oenanthe pleschanka	Pied Wheatear	LC	All migratory species in the area of impact
Clanga pomarina	Lesser Spotted Eagle	LC	All migratory species in the area of impact
Ptyonoprogne rupestris	Eurasian Crag Martin	LC	All migratory species in the area of impact
Erithacus rubecula	European Robin	LC	All migratory species in the area of impact

Scientific name	Common name	Global RL status	PBF Criteria
Linaria cannabina	Common Linnet	LC	All migratory species in the area of impact
Turdus merula	Eurasian Blackbird	LC	All migratory species in the area of impact
Turdus torquatus	Ring Ouzel	LC	All migratory species in the area of impact
Corvus monedula	Eurasian Jackdaw	LC	All migratory species in the area of impact
Turdus iliacus	Redwing	LC	All migratory species in the area of impact
Coccothraustes coccothraustes	Hawfinch	LC	All migratory species in the area of impact
Spinus spinus	Eurasian Siskin	LC	All migratory species in the area of impact
Passer hispaniolensis	Spanish Sparrow	LC	All migratory species in the area of impact
Emberiza citrinella	Yellowhammer	LC	All migratory species in the area of impact
Anthus pratensis	Meadow Pipit	LC	All migratory species in the area of impact
Pastor roseus	Rosy Starling	LC	All migratory species in the area of impact
Columba oenas	Stock Dove	LC	All migratory species in the area of impact
Emberiza calandra	Corn Bunting	LC	All migratory species in the area of impact
Regulus regulus	Goldcrest	LC	All migratory species in the area of impact
Anthus spinoletta	Water Pipit	LC	All migratory species in the area of impact
Turdus philomelos	Song Thrush	LC	All migratory species in the area of impact
Troglodytes troglodytes	Northern Wren	LC	All migratory species in the area of impact
Ficedula parva	Red-breasted Flycatcher	LC	All migratory species in the area of impact

Scientific name	Common name	Global RL status	PBF Criteria
Iduna pallida	Eastern Olivaceous Warbler	LC	All migratory species in the area of impact
Turdus pilaris	Fieldfare	LC	All migratory species in the area of impact
Buteo rufinus	Long-legged Buzzard	LC	All migratory species in the area of impact
Sylvia atricapilla	Eurasian Blackcap	LC	All migratory species in the area of impact
Columba palumbus	Common Woodpigeon	LC	All migratory species in the area of impact
Luscinia megarhynchos	Common Nightingale	LC	All migratory species in the area of impact
Corvus frugilegus	Rook	LC	All migratory species in the area of impact
Cecropis daurica	Red-rumped Swallow	LC	All migratory species in the area of impact
Ficedula albicollis	Collared Flycatcher	LC	All migratory species in the area of impact
Pyrrhula pyrrhula	Eurasian Bullfinch	LC	All migratory species in the area of impact
Galerida cristata	Crested Lark	LC	All migratory species in the area of impact
Fringilla montifringilla	Brambling	LC	All migratory species in the area of impact
Remiz pendulinus	Eurasian Penduline-tit	LC	All migratory species in the area of impact
Oenanthe hispanica	Black-eared Wheatear	LC	All migratory species in the area of impact
Otus scops	Eurasian Scops-owl	LC	All migratory species in the area of impact
Circaetus gallicus	Short-toed Snake-eagle	LC	All migratory species in the area of impact
Calandrella brachydactyla	Greater Short-toed Lark	LC	All migratory species in the area of impact
Lanius collurio	Red-backed Shrike	LC	All migratory species in the area of impact

Scientific name	Common name	Global RL status	PBF Criteria
Plectrophenax nivalis	Snow Bunting	LC	All migratory species in the area of impact
Hieraaetus pennatus	Booted Eagle	LC	All migratory species in the area of impact
Caprimulgus europaeus	European Nightjar	LC	All migratory species in the area of impact
Hippolais icterina	Icterine Warbler	LC	All migratory species in the area of impact
Phylloscopus sibilatrix	Wood Warbler	LC	All migratory species in the area of impact
Locustella fluviatilis	River Warbler	LC	All migratory species in the area of impact
Jynx torquilla	Eurasian Wryneck	LC	All migratory species in the area of impact
Carduelis carduelis	European Goldfinch	LC	All migratory species in the area of impact
Otis tarda	Great Bustard	LC	All migratory species in the area of impact
Motacilla cinerea	Grey Wagtail	LC	All migratory species in the area of impact
Oriolus oriolus	Eurasian Golden Oriole	LC	All migratory species in the area of impact
Corvus corone	Carrion Crow	LC	All migratory species in the area of impact
Bombycilla garrulus	Bohemian Waxwing	LC	All migratory species in the area of impact
Coturnix coturnix	Common Quail	LC	All migratory species in the area of impact
Asio otus	Long-eared Owl	LC	All migratory species in the area of impact
Pernis apivorus	European Honey-buzzard	LC	All migratory species in the area of impact
Lanius excubitor	Great Grey Shrike	LC	All migratory species in the area of impact
Phylloscopus collybita	Common Chiffchaff	LC	All migratory species in the area of impact

Scientific name	Common name	Global RL status	PBF Criteria
Acrocephalus arundinaceus	Great Reed-warbler	LC	All migratory species in the area of impact
Anthus campestris	Tawny Pipit	LC	All migratory species in the area of impact
Curruca curruca	Lesser Whitethroat	LC	All migratory species in the area of impact
Circus cyaneus	Hen Harrier	LC	All migratory species in the area of impact
Tachymarptis melba	Alpine Swift	LC	All migratory species in the area of impact
Buteo lagopus	Rough-legged Buzzard	LC	All migratory species in the area of impact
Curruca nisoria	Barred Warbler	LC	All migratory species in the area of impact
Circus aeruginosus	Western Marsh-harrier	LC	All migratory species in the area of impact
Delichon urbicum	Northern House Martin	LC	All migratory species in the area of impact
Fringilla coelebs	Common Chaffinch	LC	All migratory species in the area of impact
Oenanthe oenanthe	Northern Wheatear	LC	All migratory species in the area of impact
Curruca communis	Common Whitethroat	LC	All migratory species in the area of impact
Apus apus	Common Swift	LC	All migratory species in the area of impact
Circus macrourus	Pallid Harrier	NT	All migratory species in the area of impact
Monticola saxatilis	Rufous-tailed Rock-thrush	LC	All migratory species in the area of impact
Falco columbarius	Merlin	LC	All migratory species in the area of impact
Cuculus canorus	Common Cuckoo	LC	All migratory species in the area of impact
Phoenicurus phoenicurus	Common Redstart	LC	All migratory species in the area of impact

Scientific name	Common name	Global RL status	PBF Criteria
Accipiter nisus	Eurasian Sparrowhawk	LC	All migratory species in the area of impact
Anthus trivialis	Tree Pipit	LC	All migratory species in the area of impact
Falco subbuteo	Eurasian Hobby	LC	All migratory species in the area of impact
Falco tinnunculus	Common Kestrel	LC	All migratory species in the area of impact
Phylloscopus trochilus	Willow Warbler	LC	All migratory species in the area of impact
Asio flammeus	Short-eared Owl	LC	All migratory species in the area of impact
Upupa epops	Common Hoopoe	LC	All migratory species in the area of impact
Saxicola torquatus	Common Stonechat	LC	All migratory species in the area of impact
Alauda arvensis	Eurasian Skylark	LC	All migratory species in the area of impact
Acrocephalus schoenobaenus	Sedge Warbler	LC	All migratory species in the area of impact
Milvus migrans	Black Kite	LC	All migratory species in the area of impact
Lanius senator	Woodchat Shrike	NT	All migratory species in the area of impact
Sturnus vulgaris	Common Starling	LC	All migratory species in the area of impact
Phoenicurus ochruros	Black Redstart	LC	All migratory species in the area of impact
Sylvia borin	Garden Warbler	LC	All migratory species in the area of impact
Falco peregrinus	Peregrine Falcon	LC	All migratory species in the area of impact
Hippolais olivetorum	Olive-tree Warbler	LC	All migratory species in the area of impact
Muscicapa striata	Spotted Flycatcher	LC	All migratory species in the area of impact

Scientific name	Common name	Global RL status	PBF Criteria
Accipiter gentilis	Northern Goshawk	LC	All migratory species in the area of impact
Motacilla flava	Western Yellow Wagtail	LC	All migratory species in the area of impact
Luscinia svecica	Bluethroat	LC	All migratory species in the area of impact
Emberiza schoeniclus	Reed Bunting	LC	All migratory species in the area of impact
Motacilla alba	White Wagtail	LC	All migratory species in the area of impact
Locustella luscinioides	Savi's Warbler	LC	All migratory species in the area of impact
Hirundo rustica	Barn Swallow	LC	All migratory species in the area of impact
Luscinia luscinia	Thrush Nightingale	LC	All migratory species in the area of impact
Ficedula semitorquata	Semi-collared Flycatcher	LC	All migratory species in the area of impact
Riparia riparia	Collared Sand Martin	LC	All migratory species in the area of impact