Biodiversity Management Plan for Dunarea East Wind Farm, Romania

THE BIODIVERSITY CONSULTANCY

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Citation: TBC (2026). *Biodiversity Management Plan for Dunarea East Wind Farm, Romania*. March 2026, The Biodiversity Consultancy Ltd, Cambridge.

This report was prepared for Midmar Callatis S.R.L.

Document information	
Document title	Biodiversity Management Plan for Dunarea East Wind Farm, Romania
Document subtitle	
Project No.	DUN01
Date	12/05/2026
Version	2nd Draft
Author	Iain Lednor, Lucy Murrell, Mihai Coroi, Filipe Canário, Vineet Katariya
Client name	Midmar Callatis S.R.L.

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Acronym	Definition
ANANP	National Agency for Protected Natural Areas (Agenția Națională pentru Arii Naturale Protejate)
ANMAP	National Agency for Environment and Protected Areas (Agenția Națională pentru Mediu și Arii Protejate)
ANPM	National Environment Protection Agency (Agenția Națională pentru Protecția Mediului)
AZE	Alliance for Zero Extinction
BAP	Biodiversity Action Plan
BMP	Biodiversity Management Plan
CHA	Critical Habitat Assessment
CIA	Cumulative Impact Assessment
CR	Critically Endangered
CRA	Collision Risk Assessment
CSMP	Contaminated Soil Management Plan
EAAA	Ecologically Appropriate Area of Analysis
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EN	Endangered
EPC	Engineering, Procurement, Construction
ESHS	Environmental, Social, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESR6	Environmental and Social Requirement 6
EU	European Union
E&S	Environmental and Social
GIIP	Good International Industry Practice
GWh	Gigawatt-hour
IAS	Invasive Alien Species
IBA	Important Bird Area
IFC	International Finance Corporation
IUCN	International Union for Conservation of Nature
KBA	Key Biodiversity Area

Acronym	Definition
kV	Kilovolt
LC	Least Concern
MW	Megawatt
NG	Net Gain
NNL	No Net Loss
NT	Near Threatened
O&M	Operation and Maintenance
PBF	Priority Biodiversity Feature
PPCP	Project Pollution Control Plan
PS6	Performance Standard 6
SCI	Site of Community Importance
SPA	Special Protection Area
TMP	Traffic Management Plan
VEC	Valued Environmental Component
VU	Vulnerable
WMP	Waste Management Plan

1 Introduction

1.1 Context and purpose of the BMP

This document is the Biodiversity Management Plan (BMP) for the Dunarea East Wind Farm (the Project) in County Constanta, Romania, which is being developed by Midmar Callatis S.R.L (the Client).

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 Project therefore aims for full compliance with IFC Performance 6 (PS6) (IFC 2012, 2019a) and EBRD Environmental and Social Requirement 6 (ESR6) (EBRD 2025).

This BMP has been developed to effectively manage biodiversity risks associated with the Project. It provides clear guidance on mitigating impacts to biodiversity in the Project area of influence (AoI) during both the construction and operation phases. It also sets out the approach for monitoring the implementation of these mitigation measures, with particular focus on the priority species and habitats identified for the Project.

A Critical Habitat Assessment (CHA) update has been completed for this Project (TBC 2026), which concluded that the Project area is likely to qualify as Critical Habitat under EBRD ESR6 for one species and three habitats (see Section 3.1.2). The biodiversity priorities in this BMP are those identified in the CHA, including Critical Habitat qualifying species and habitats, Priority Biodiversity Features (as per EBRD ESR6), natural habitats, and any other biodiversity features of conservation concern (Section 3.1) that are likely to be affected by the Project either permanently or temporarily.

The BMP approach is based on the mitigation hierarchy, avoiding the impacts where possible, defining and implementing mitigation measures to minimise unavoidable impacts, and restoring biodiversity features if minimisation is limited or cannot be implemented. Biodiversity offsets, other forms of compensation, and additional conservation actions are not included in this BMP. They are usually included in Biodiversity Action Plans (BAP) but a BAP has not yet been developed for the Project.

The biodiversity management and monitoring actions in this BMP will be implemented in conjunction with all other relevant management documents and plans that have been developed, or planned to be developed, for the Project (see Section 5.2.11). The parties responsible for implementing the mitigation measures in this BMP will also consult and use the other relevant management plans where more detailed or practical implementation information may be provided.

This BMP, and associated management plans, are 'living' documents that may be updated as often as necessary, for example based on the results of monitoring activities, a change in a species' IUCN status, or project design changes.

1.2 Project description

The Project (Figure 1) 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.

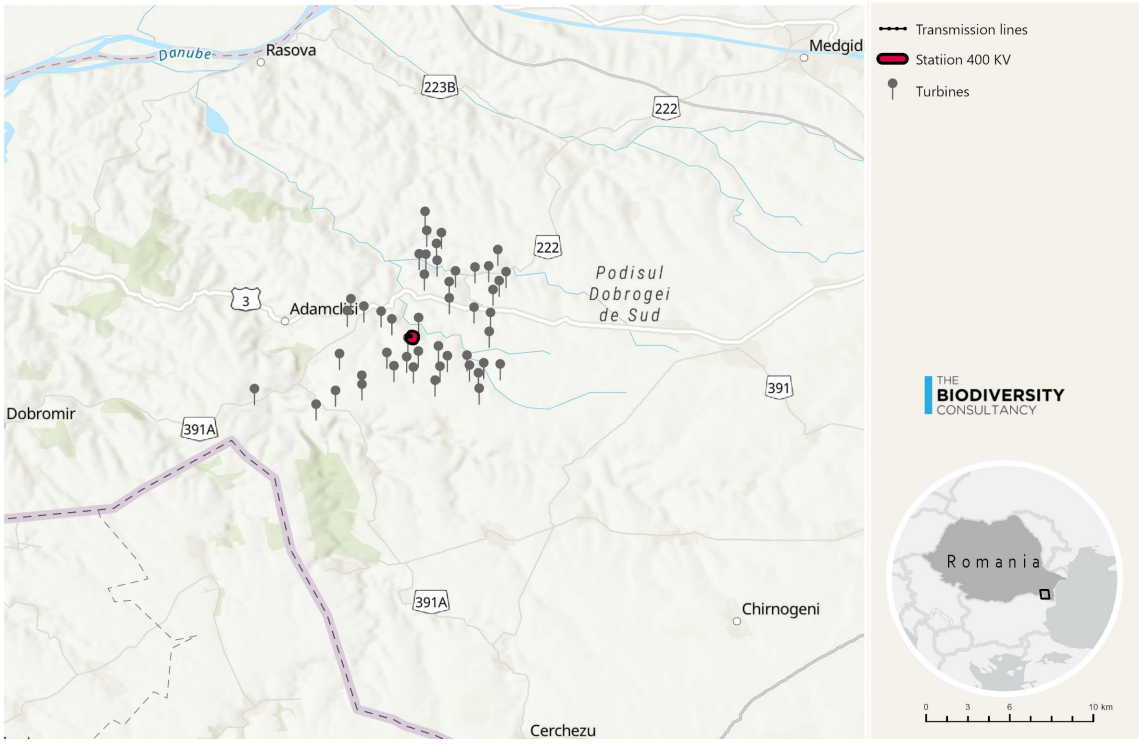

Figure 1. Location of Project infrastructure

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

2 Legal, policy and lender requirements

2.1 National legislation

The Romanian institutions and legislation presented in Table 1 below are relevant to this BMP.

Table 1. Relevant national institutions and legislation.

Institution / Legislation	Description
Ministry of Environment, Waters and Forests (Ministerul Mediului, Apelor şi Pădurilor)	Ministry of Environment, Waters and Forests implements national policy in the fields of environmental protection, green economy, biodiversity, protected natural areas and climate change. They have published national guidance on the Appropriate Assessment of potential effects of projects on Natura 2000 sites and have developed management plans for Natura 2000 sites in Romania.
National Agency for Environment and Protected Areas (Agenția Națională pentru Mediu și Arii Protejate (ANMAP))	In 2025, the National Environment Protection Agency (Agenția Națională pentru Protecția Mediului (ANPM)) merged with the National Agency for Protected Natural Areas (Agenția Națională pentru Arii Naturale Protejate (ANANP)). ANPM was the regulator in terms of environmental protection (according to art. 8 of GEO 195/2005 on environmental protection approved with amendments by Law 265/2006). ANANP was established in 2016 (by Law no. 95/2016 and operated under Government Decision no. 997/2016) for unitary and efficient administration of protected natural areas and the conservation of Natural Habitats, flora and fauna. The merging of these agencies in 2025 has resulted in the National Agency for Environment and Protected Areas (Agenția Națională pentru Mediu și Arii Protejate (ANMAP)). ANMAP has been established to strengthen administrative capacity and simplify procedures. The agency is responsible for implementing policies, strategies and national legislation in the field of environmental protection and natural protected areas. It manages natural protected areas, and proposes strategies and programmes for the conservation of these areas and protected flora and fauna species, and is responsible for environmental monitoring and issuing regulatory acts.
Law 137/1995 on Environmental Protection	The environmental legal framework in Romania contains overarching laws covering such areas as environmental protection, water, waste, nature protection, noise protection, air quality and cultural heritage, which transpose the main obligations of particular EU Directives.

Institution / Legislation	Description
Law 49/2011 validating the Emergency Ordinance of Government No. 57/2007 on the regime of protected natural areas, conservation of Natural Habitats, wild flora and fauna	Law on the regime of natural protected areas, the conservation of Natural Habitats, wild flora and fauna. It amends the previous comprehensive Government Emergency Ordinance 57/2007, published to fully align national legislation with that of the EU, taking into account the provisions of Directive 79/409/EEC on the conservation of wild birds and Directive 92/43/EEC on the conservation of Natural Habitats and of species of wild flora and fauna. The law establishes a national ecological network of protected areas.
Methodological Guide from June 14, 2023 on the appropriate assessment of the potential effects of plans or projects on protected natural areas of Community interest	This methodological guide, published by the Ministry of Environment, Waters and Forests, establishes the steps to be taken in order to carry out the Appropriate Assessment, according to the provisions of art. 28 of Government Emergency Ordinance no. 57/2007 on the regime of protected natural areas, conservation of Natural Habitats, flora and fauna.
Law 292/2018 on the assessment of the impact of certain public and private projects on the environment	This Law defines the EIA phase and includes procedures for the identification, assessment, and reporting of the environmental impacts of certain proposed projects and associated administrative procedures. It is aligned with the requirements of the EU EIA Directive 2014/52/EU.

2.2 Corporate framework and policies

Rezolv Energy, the parent company of Midmar Callatis S.R.L, has a sustainability strategy that is built on industry best practice and adheres to international standards, including the Equator Principles and the IFC's Environmental and Social Performance Standards. Rezolv Energy has developed a Group Nature Strategy that commits to achieving No Net Loss (NNL) of biodiversity and now aims to achieve a Net Positive Impact on nature for their direct operations[1].

2.3 Lender standards

The Project intends to align itself with the following lender standards:

- IFC Performance 6 (PS6) (IFC 2012, 2019a)
- EBRD Environmental and Social Requirement 6 (ESR6) (EBRD 2025)

Appendix 1 includes details on the requirements of each standard and their applicability to the Project.

3 Biodiversity context and priorities

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

[1] https://rezolv.energy/sustainability/

located within the Pontic Steppe Ecoregion (PA0814)[2]. 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 (ERM 2023b), eight 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 of EU Habitats Directive (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.

Mammal surveys were conducted for the Project in 2021, recording three non-flying mammal species listed on Annex II and IV of Habitats Directive. According to the IUCN these are threatened at international level:

- European Ground Squirrel (*Spermophilus citellus*) assessed globally as Endangered (EN)
- Romanian hamster (*Mesocricetus newtoni*) assessed globally as Near Threatened (NT)
- Common tortoise (*Testudo graeca*) assessed globally as Vulnerable (VU).

As described in the 2023 ERM's Scoping report (ERM 2023c), the Project area partially overlaps two Natura 2000 sites: ROSCI0353 Pestera – Deleni Natural Area and ROSCI0071 Dumbraveni – Valea Urluia Natural Area - Lacul Vederoasa.

The CHA update (TBC, 2026) identified the following three EU priority habitats, located in ROSCI0071 Dumbraveni – Valea Urluia Natural Area - Lacul Vederoasa as triggering Critical Habitat due to their presence in the wider area of analysis:

- 62C0* Ponto-Sarmatic steppes with *Stipion lessingianae* plant associations
- 91I0* Euro-siberian forest-steppe with Quercus spp.

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

- 40C0* Ponto-Sarmatic deciduous thickets, with *Pruno spinosae-Crataegetum* plant associations.

One turbine is located within each of the above protected areas, yet both are sited in arable land with no conservation value (DNV Italy 2026). However, the nature of a wind farm and the associated impacts on habitats and species present mean that these habitats are provisionally classified as Likely Critical Habitat due to the fact they are listed as priority habitats in Annex I of the EU Habitats Directive.

3.1 Biodiversity priorities in this BMP

This BMP focusses on habitats and species that are of conservation importance, including Critical Habitat qualifying species and Priority Biodiversity Features that are likely to be affected by the Project. The biodiversity priorities for this BMP are presented in the following sections.

3.1.1 Legally Protected Areas and Internationally Recognized Areas

The Project has a marginal overlap with two Natura 2000 designated sites[3]:

- ROSCI0353 Pestera – Deleni Natural Area
- 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 2). The three sites are summarised below.

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

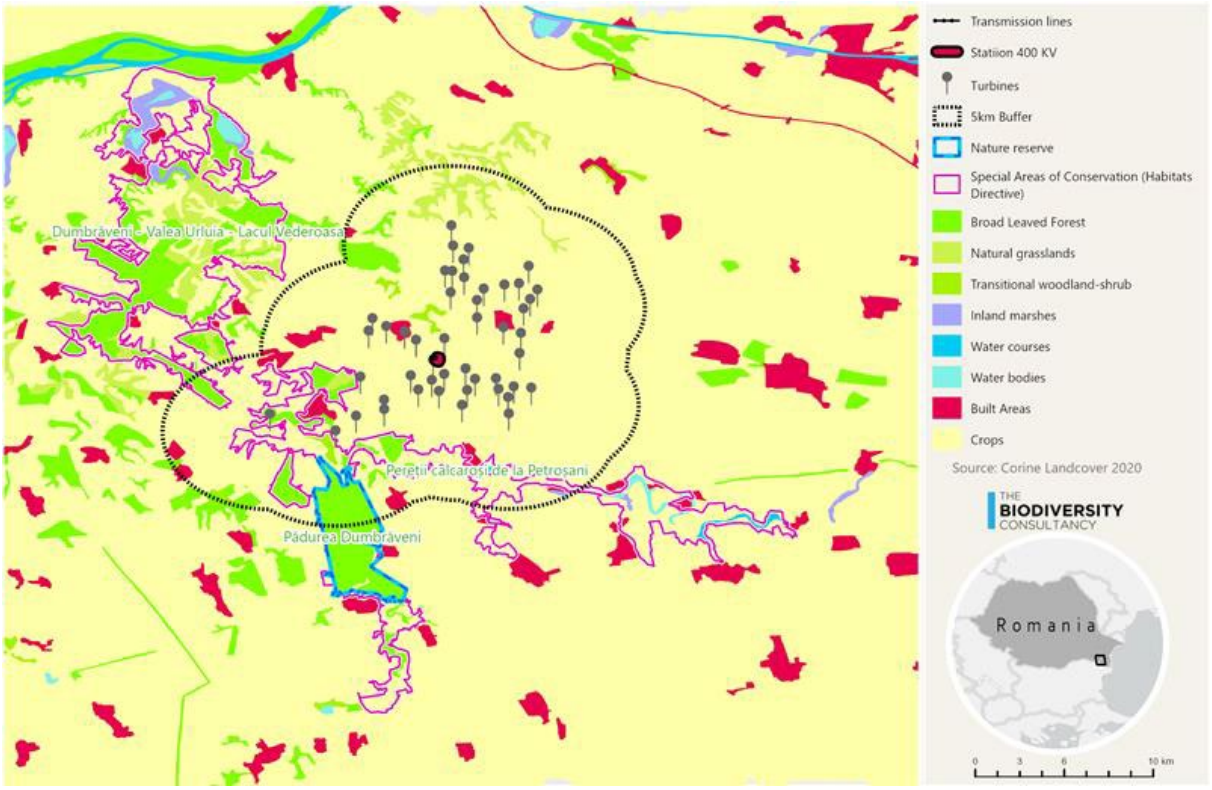

Figure 2. Habitat Map and Natura 2000 Sites in proximity to the Project

Aliman – Adamclisi Special Protection Area (SPA) (ROSPA0001[4])

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[5] (KBA) and Important Bird Area[6] (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 an IUCN management category and it is designated at a regional level. The management authority is the Agentia Nationala pentru Mediu si Arii Protejate (ANMAP)[7]. A management plan has been prepared for several Natura 2000 sites including this one.

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

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

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

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

Dumbrăveni - Valea Urluia - Lacul Vederoasa Site of Community Importance (SCI) (ROSCI0071[8])

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.

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 [9]. A management plan has been prepared for several Natura 2000 sites including this one.

Peștera - Deleni SCI (ROSCI0353[10])

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 11, but no management plan is in place.

3.1.2 Critical and Natural Habitat

The CHA (TBC, 2026) indicated that the Project is within an area that is unlikely to meet the IFC definition of Critical Habitat, as no terrestrial or aquatic high-risk species meet the thresholds for IFC PS6 criteria in the Project's Ecologically Appropriate Area of Analysis (EAAA) (TBC 2026). However, the Project is located in small areas of Critical Habitat in accordance with EBRD ESR6 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

Figure 2 shows the land use within a 5 km buffer of the Project, to take into account potential indirect impacts, whilst Table 2 shows the area of each Land Cover class within this area. European Environment Agency (EEA) CORINE land cover data was used to classify the habitats. The three aforementioned priority habitats that qualify as Critical Habitat are located within the

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

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

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

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

Natura 2000 protected area: ROSCI0071 Dumbrăveni - Valea Urluia - Lacul Vederoasa (SCI: Site of Community Importance). However, only one turbine is located within the Natura 2000 SCI mentioned above, and the turbine within the SCI is located on arable land.

Table 2. Area of CORINE Land Cover Classes within 5 km of the Project

Land Use	Area within 5 km buffer of Project (Km^2 / %)
Agricultural areas	310.57 km^2 / 86 %
Artificial surfaces	10.85 km^2 / 3 %
Forest and semi natural areas	39.40 km^2 / 10.9 %
Water bodies	0.003 km^2 / 0.007 %
Wetlands	0.28 km^2 / 0.08 %
Total	361.10 km^2

3.1.3 Priority Biodiversity Features

A total of 134 species have been identified as PBFs for the Project, in alignment with EBRD ERS6 criteria. One hundred and fifteen of these are migratory birds, as under Criterion 4.a, all migratory species regularly occurring in the area of impact that are not CH-qualifying are classified as PBFs. These 115 species have the potential to use the airspace in the AoI and are likely to use the terrestrial habitats associated with the EAAA. Thus, the avian species migrating through the Project's AoI and using associated terrestrial habitats qualify as PBFs. These are listed in Appendix 3.

Following the detailed and updated CHA (TBC 2026), a further 19 species were identified as PBFs, including eleven bird species, one reptile species, and seven mammal species (Table 3)[12].

Table 3. Priority Biodiversity Features, as per EBRD ESR6

Scientific name	Common name	Global RL status	Nat/reg RL status	PBF Criteria
Mammals				
	European Ground Squirrel	EN		Species in the area of impact listed in Annex II of Habitats Directive, Annex I of

[12] N.B. All 11 avian species assessed in detail against the CH criteria and subsequently classified as PBFs as per Table 3, 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
Spermophilus citellus			EN (Europe)	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
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

Scientific name	Common name	Global RL status	Nat/reg RL status	PBF Criteria
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
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

4 Potential impacts on biodiversity

This section provides an overview of the potential biodiversity impacts related to the Dunarea East WF site and associated transmission line for the construction and operation phases of the Project. The impacts mentioned below were identified and evaluated as part of the Project's ESIA (DNV Italy 2026) and other assessments including a Cumulative Impact Assessment (CIA) and Collision Risk Assessment (CRA) (Appendix H and Appendix K: DNV Italy 2026). Previously identified impacts have been supplemented with known biodiversity impacts of wind farm projects that are also expected to occur (Bennun *et al.* 2021).

4.1 Project impacts

4.1.1 Construction phase

Project impacts during the construction phase (Table 4) primarily arise from the loss of terrestrial habitats (including habitats for fauna) and plant species, due to earthworks and the clearing of vegetation for the turbines, transmission line and associated buildings and access roads. In this case, only modified habitat is expected to be lost under the Project footprint, assuming that appropriate avoidance measures are implemented to conserve the fragments of natural habitat surrounding the Project infrastructure (see Table 6).Degradation of habitats (including natural habitats surrounding the construction areas) is possible, due to increased human activity, dust emission, soil/water pollution, and the spread of invasive plant species. The displacement of, and disturbance to, priority fauna species, as well as barriers to their movement, are also possible during construction.

During construction, potential impacts on biodiversity are primarily associated with site preparation, civil works, road construction and turbine installation activities. The project footprint (turbines WTG 74 and WTG 133 only) partially overlaps the margins of nearby Natura 2000 sites, including ROSCI0353 Peștera–Deleni and ROSCI0071 Dumbrăveni–Valea Urluia–Lacul Vederoasa; however, works within these areas are limited, short-term and confined to already modified agricultural or ruderal habitats. As a result, habitat loss, degradation or fragmentation of protected areas (including the qualifying habitats and species) is assessed as low prior to mitigation and negligible following the application of the mitigation hierarchy, including micro-siting, minimisation of land take and full reinstatement of temporarily disturbed areas. No significant impacts on the ecological integrity or conservation objectives of protected areas are anticipated during construction (DNV Italy 2026).

Construction activities may cause temporary disturbance to PBF qualifying migratory birds through increased human presence, noise, vehicle movement and machinery operation. These effects are expected to result mainly in short-term displacement or behavioural avoidance, rather than direct mortality or habitat loss, as no key breeding sites or migratory bottlenecks are located within the active construction footprint. For small mammals, including the priority species, the European ground squirrel (*Spermophilus citellus*), impacts are limited to temporary habitat disturbance, risk of accidental injury during earthworks, and short-term avoidance of active works areas. Pre-construction checks, habitat management measures and controlled working practices reduce these risks, resulting in residual impacts assessed as low. For bats, construction-phase impacts are expected to be limited to temporary disturbance of foraging activity near field edges or linear features, with no loss of confirmed roosts. With restrictions on night-time works where necessary and retention of boundary vegetation, residual impacts on bats during construction are considered low (DNV Italy 2026).

Table 4: Project Impacts – Construction

Project component	General impacts on biodiversity
Wind farm site	Loss and degradation of priority terrestrial habitats and associated plant species, priority fauna habitats and the introduction of alien invasive species, due to clearing of vegetation for turbines and buildings, construction or upgrading of access roads, and disposal of excavation and surplus materials.
	Loss or displacement of, or disturbance to fauna species including priority mammals, migratory birds, priority reptiles and bats)due to clearance of vegetation for project infrastructure or access to infrastructure, noise, light and movement of vehicles.
	Barriers to movement for fauna due to construction of turbine hard stands and access roads.
Transmission line	Loss and degradation of priority terrestrial habitats, plant species and habitat for priority fauna species, due to clearing and stripping of vegetation within the transmission line corridor, construction or upgrading of access roads, and disposal of excavation and surplus materials.
	Loss or displacement of, or disturbance to, priority fauna species, due to clearing of vegetation for transmission pylons, construction or upgrading of access roads, and disposal of excavation and surplus materials.
	Barriers to movement for priority fauna, due to construction of the transmission line and access roads.

4.1.2 Operation phase

Project impacts during the operational phase (Table 5) primarily arise from mortality of birds and bats due to collisions with the wind turbines. Other impacts include mortality of birds from electrocutions and collisions with the transmission line and pylons, along with disturbance to susceptible fauna due to light, vehicle traffic and vegetation maintenance activities, and as well as barriers to the movement of fauna.

During operation, the wind farm is expected to have negligible long-term impacts on protected areas, as permanent land take is small, spatially discrete and restricted mainly to two turbine bases, access tracks and the on-site substation, all located within an intensively farmed landscape. The presence of turbines and associated infrastructure does not result in measurable habitat fragmentation within Natura 2000 sites, and indirect effects such as noise and human activity are low and highly localised. Consequently, residual operational impacts on protected areas and their conservation objectives are assessed as negligible.

A collision risk assessment (CRA) for birds within the overall Dunarea Wind Farm array was undertaken by ERM in 2023 (ERM, 2023d) to quantify the potential mortality of 29 bird species from turbine collisions. The species were selected from a total of 60 recorded from Project field surveys, and the species chosen were based on the local SPA qualifying status, flight activity,

sensitivity to collision risk and IUCN European Red List categorisation and/or inclusion on Annex I of the EU Birds Directive.

The CRA followed the NatureScot model (NatureScot, 2000) with species-specific avoidance rates applied to account for behaviour avoidance. For full details on the methodology, please refer to the Project CRA (ERM, 2023d). The model estimated annual collision mortalities with SNH avoidance rates applied. The highest estimated mortalities were for the following species, which are all PBF species as migratory species per EBRD ESR6:

- *Ciconia ciconia* (White Stork): 4.78 birds/year
- *Buteo buteo* (Common Buzzard): 2.01 birds/year
- *Sturnus vulgaris* (Common Starling): 1.28 birds/year

The CRA and ESIA supported a conclusion that impacts to avifauna species from collision will be low-to-moderate during operation due to the turbines sitting away from major flyways and roosting areas.

Small mammals, including *Spermophilus citellus*, may exhibit localised avoidance of turbine bases and access roads; however, habitat availability and landscape connectivity at the population level remain unaffected due to the limited spatial footprint and continued agricultural land use. For bats, operational impacts primarily relate to collision risk during low wind speed conditions, particularly for high-flying and migratory species. The implementation of operational curtailment, adaptive management and long-term bat mortality monitoring significantly reduces this risk, resulting in residual impacts assessed as low.

Overall, with mitigation in place, the operational phase is not expected to give rise to significant adverse effects on priority biodiversity.

Table 5: Project Impacts – Operation

Project component	General impacts on biodiversity
Wind farm site	Loss and degradation of terrestrial habitat and plant species, fauna habitats and the introduction of alien invasive species, due to the maintenance of vegetation around turbines, buildings and associated infrastructure.
	Increased mortality of priority bird and priority bat collisions with turbines.
	Barrier and fragmentation effects for priority bird and priority bat movements.
	Disturbance to susceptible birds, reptiles and terrestrial mammals due to light, vehicle traffic and maintenance activities.
Transmission line	Loss and degradation of terrestrial ecosystems, plant species, fauna habitats and introduction of alien invasive species, due to the maintenance of vegetation in the transmission line right-of-way.
	Increased mortality due to bird collisions (particularly large priority raptors) and electrocutions with transmission line and/or pylons (both birds and bats).

Project component	General impacts on biodiversity
	Barrier and fragmentation effects for priority bird and priority bat movements.
	Disturbance to susceptible birds, reptiles and terrestrial mammals due to vehicle traffic and maintenance activities.

4.2 Cumulative impacts

A Cumulative Impact Assessment (CIA) study has been undertaken for the Project in line with IFC's Cumulative Impact Assessment and Management Good Practice Handbook (IFC 2013; Appendix K: DNV Italy 2026). The study examined whether the Project's incremental effects, when added to other regional developments, could influence the condition, trends, or resilience of specific Valued Environmental Components (VECs). It was determined that the Project is not expected to be a major driver of cumulative impacts in the region. However, certain VECs require precautionary management due to uncertainty or overlapping development footprints. Below is a summary of the biodiversity-related results:

VEC 1 – Birds and Bats

- *Habitat loss:* Regional land conversion does not currently indicate a risk of functional habitat loss, though limited thresholds and future land-use uncertainties justify precautionary habitat management.

- *Collision risk:* Existing assessments predict low mortality levels. Population-level effects are unlikely, but uncertainties for certain species warrant continued monitoring and possible operational adjustments.

The mitigation proposed for the Project was considered sufficient to keep its cumulative contribution at low or negligible levels. The CIA highlights additional regional or cross-project actions that, while not the sole responsibility of the Project, would strengthen cumulative impact management, including coordinated habitat enhancement and data sharing for birds and bats, and participation in regional renewable energy and biodiversity planning initiatives. These actions would be considered and developed in the BAP for this Project.

5 Mitigation approach for biodiversity management

5.1 Mitigation principles

The mitigation measures adopted by the Project will follow the mitigation hierarchy: avoid, minimise, restore, and compensate/offset (Figure 3). Avoidance entails 'designing out' an impact or risk (e.g., through relocating a project component, avoiding a harmful activity, employing alternative technology), preventing their expected impacts on biodiversity. Minimisation reduces the severity of impacts on biodiversity by controlling or limiting the source of that impact. Such actions reduce the likelihood or magnitude of biodiversity impacts, but do not completely prevent them. Development projects tend to focus on minimisation, but often impact reduction is less significant than anticipated, so avoidance is preferable. Restoration seeks to recreate the original (pre-project) habitat type or to actively enhance the rate of recovery of degraded habitats on the actual Project site, with a focus on areas affected temporarily during construction. Where significant residual impacts remain, compensation/offset actions to achieve an overall NNL for natural habitat, where feasible, and NG for critical habitat-qualifying features will need to be developed as appropriate[13].

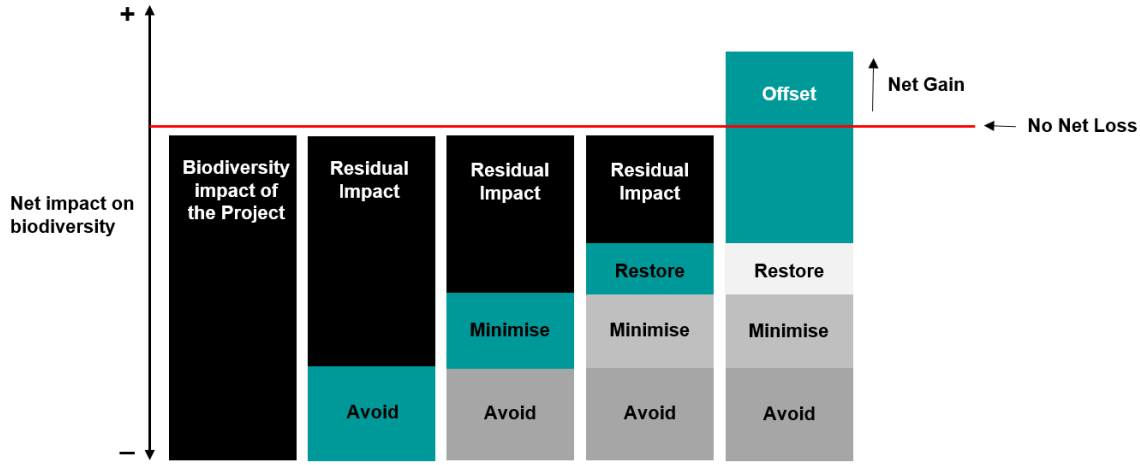

Figure 3: The Mitigation Hierarchy and delivery of net positive impact on biodiversity.

5.2 Mitigation actions

This section includes a description of the mitigation actions (avoidance, minimization, on-site restoration) that the Project will implement to address the impacts that construction and operation activities are most likely to cause.

The BMP does not present a full suite of actions to address NNL or NG targets for these components (this will be further detailed in a BAP). The BMP provides an overview of the general

[13] Residual impacts will be calculated, and offsets discussed, in a Biodiversity Action Plan (BAP).

actions and supporting documents required to mitigate impacts, which will help to achieve NNL and NG targets, with a clear indication of implementation responsibilities.

5.2.1 Associated management plans

The biodiversity management actions in this BMP will be implemented in conjunction with the following relevant management documents and plans that are expected to be developed and implemented for the Project, as mentioned in the ESIA (DNV Italy 2026), which must be consulted for details of the mitigation measures (as well as any additional relevant Project plans that are developed but not mentioned in this BMP):

- Waste Management Plan (WMP)
- Project Pollution Control Plan (PPCP)
- Contaminated Soil Management Plan (CSMP)
- Spill Prevention and Emergency Response Plan
- Traffic Management Plan (TMP)
- Invasive alien plant species (IAS) control plan and programme
- Post-construction Habitat Restoration Plan

A brief description of the most relevant management plans is presented below.

Waste Management Plan (WMP)

A comprehensive Waste Management Plan (WMP) will be developed and implemented for the entire project lifecycle, including construction, operational, and decommissioning (DNV Italy 2026). The WMP will outline key strategies for efficient waste management and compliance with legal requirements, focusing on minimising environmental impacts.

The plan will include:

- Identification of Waste: A thorough identification of all waste streams generated during each phase of the project.
- Waste Minimization: Strategies to reduce waste generation at the source, focusing on efficiency and resource conservation.
- Reuse and Recycling: Maximizing the reuse and recycling of materials to reduce landfill disposal and promote sustainable practices.
- Disposal: Ensuring that non-recyclable or non-reusable waste is disposed of in an environmentally responsible manner, following Romanian regulations.

The WMP will be continuously updated and adapted as the project progresses, ensuring that waste is managed efficiently, with a focus on reducing environmental impact at every stage of the project.

Project Pollution Control Plan (PPCP)

A Project Pollution Control Plan (PPCP) will be developed and implemented (DNV Italy 2026) which will detail the soil protection and erosion control measures, including dust suppression, temporary soil stabilisation, and storm-water and sediment management during construction. It

should also include details of hazardous substance storage and transport, as well as wastewater treatment, and monitoring protocols (DNV Italy 2026).

Contaminated Soil Management Plan (CSMP)

A Contaminated Soil Management Plan (CSMP) will be also developed and implemented for appropriate handling, treatment and disposal of any contamination of soil (DNV Italy 2026).

Spill Prevention and Emergency Response Plan

A Spill Prevention and Emergency Response Plan will be developed and for the construction phase. This plan will establish procedures for reducing spill risks and procedures for intervention in the event of a spill (Societatea De Cercetare A Biodiversitatii Si Ingineria Mediului 2025).

Traffic Management Plan (TMP)

A Traffic Management Plan (TMP) will be developed and implemented, defining routing, scheduling and transport hours, speed limits, signage and safety procedures for all construction and maintenance traffic (DNV Italy 2026).

Invasive alien plant species control plan and programme

A suitable invasive alien plant species (IAS) control plan and programme will be developed and implemented before the start of construction to manage IAS within the control of the development (DNV Italy 2026). This plan should outline strategies and actions for prevention, eradication, control, early detection, rapid response, and habitat restoration. The plan should list the IAS species already present and those prioritized for management. The importance of preventing the introduction of new species to the area should be emphasized, as well as of eradicating species in the early stages of establishment. Early detection of IAS should be highlighted as crucial for effective management when prevention is not possible.

Post-construction Habitat Restoration Plan

A post-construction habitat restoration plan will be developed and implemented (DNV Italy 2026). This should detail the restoration and revegetation measures for the cleared and disturbed areas due to construction, including the removal of temporary structures, regrading of disturbed land to match original contours, seeding or planting with native vegetation (the plan should detail technical aspects critical for successful revegetation, such as timings, site preparation, tree species and seedlings selection, transportation of seedlings, protection of the revegetation site etc.), installing permanent erosion control structures where required, and ensuring no residual pollution or material spread remains in the environment.

5.2.2 Construction phase

The mitigation measures to be implemented during the construction phase are described in Table 6 and Table 7. The mitigations measures cover a range of temporary and permanent impacts that are expected to occur from the construction of the wind farm site and associated

transmission line. A range of good-practice mitigation actions were included in the Project's ESIA (DNV Italy 2026), along with other Project documents such as the environmental permit (ANANP 2025), and are summarised in Table 6 and Table 7. Additional measures were provided by TBC where necessary, incorporating GIIP mitigation actions, including those from the World Bank Group Environmental, Health, and Safety (EHS) General Guidelines, and EHS Guidelines for Wind Energy (World Bank Group 2007, 2015), and the guidelines for mitigating biodiversity impacts associated with solar and wind energy development (Bennun *et al.* 2021). The ultimate implementation and oversight of the measures are under the responsibility of the Engineering, Procurement, Construction (EPC) Contractor.

The priority habitats and species referred to in the following tables are those identified in Section 3.1 above.

Table 6: Mitigation measures to be implemented during construction of the wind farm

Item no.	Requirement	Priority features and relevant mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[14]
BMP 01	Minimise earthworks and the clearing, stripping and/or removal of vegetation	• **Priority habitats and fauna species**: Restrict earthworks and the removal of vegetation to agricultural and pasture habitats only (i.e. modified habitat), and to the areas strictly necessary for the execution of the works. Avoid the removal of any trees or shrubs. • **Priority habitats:** Although the Project footprint does not directly overlap with any priority habitats listed in Annex I of the EU Habitats Directive, some of these habitats are in close proximity to the site. These areas should be mapped and protected by employing appropriate barrier fencing and/or other forms of demarcations, within which any access or work is prohibited. Habitats for protection include: ○ 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. • **Priority habitats:** Demarcate the construction zone on a map and on the ground clearly using high visibility tape for instance, to avoid impacting on sensitive areas outside of the permitted construction area.	Starting prior to the start of works, continuing throughout construction	EPC contractor (all excluding vegetation management) Biodiversity Manager (vegetation management)	Percentage of vegetation identified for retention actually retained, using the change in area of planned vegetation retention within the wind farm site. Barriers defined around priority habitats listed in Annex I of the EU Habitats Directive. Barrier fencing (or other forms of demarcation) to be verified in the field. Number of staff and contractors trained in environmentally-appropriate procedures,	100% of planned vegetation retained Barriers defined around all priority habitats prior to the start of works 100% of staff receive training with biodiversity component in	Monthly monitoring during construction Monthly monitoring during construction Monthly monitoring

[14] According to the Project environmental permit (ANANP 2025), a biodiversity monitoring report shall be submitted to ANANP (now ANMAP as of March 2026) every six months, within 10 working days of the end of the working half-year.

Item no.	Requirement	Priority features and relevant mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[14]
		• **Priority habitats:** Promote awareness-raising among workers not to harvest or damage plant specimens and address the ecological value of flora, vegetation and natural habitats and train them in environmentally-appropriate procedures to be followed on site. • **Priority habitats:** Vegetation clearing and stripping, and exposure of bare soil should, where possible, be reduced during periods when heavy rainfall is most likely to occur to minimise erosion. • **Priority habitats:** Work should not be carried out when the ground is waterlogged (i.e. during periods of heavy rainfall and immediately after rainfall, until the ground has dried out), as per the Project environmental permit (ANANP 2025). • **Priority habitats:** Where possible, employ manual methods (e.g. hoeing or hand-pulling) to clear the ground of vegetation to limit soil and fauna disturbance. • **Priority habitats:** Use existing access roads or upgrade existing roads wherever possible before considering new access road construction. Prohibit travel on unauthorised roads/land to protect existing vegetation and minimise soil inversion.			using biodiversity-awareness training records.	the last 6 months	during construction
BMP 02	Restore cleared / stripped / removed vegetation	• **Priority habitats:** Prepare and implement a Landscape Restoration Plan (DNV Italy 2026) that includes the use of native, site-specific and non-invasive species. This plan will outline the timing of restoration activities, methods to be employed, responsible parties, and monitoring protocols to assess restoration success.	Throughout construction, continuing to operations (see Table 8)	EPC contractor with oversight by the Biodiversity Manager	Quality of habitat in the restoration areas of the wind farm site, from results of restoration monitoring.	Increase in habitat quality compared to baseline measured at the beginning of restoration	At the end of construction (to be continued during operation (see Table 8))

Item no.	Requirement	Priority features and relevant mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[14]
		• **Priority habitats:** Prior to earthmoving works, topsoil should be removed and stockpiled for later re-use in areas affected by the works. • **Priority habitats:** After the works, adequate decompaction of soils that have been compacted by the movement of machinery and vehicles is necessary, thus facilitating the recovery of habitats. • **Priority habitats:** Carry out landscape restoration, using native vegetation, as soon as possible after the end of construction on temporarily-impacted land and other areas that have been affected by the work (e.g., construction site area, substation surroundings). The timing of restoration should be ecologically informed and should follow the suggested timings in the Landscape Restoration Plan. • **Priority habitats:** Use soil, mulch and vegetation debris (that contains natural seed stock) to facilitate natural revegetation of disturbed areas where reasonably practicable. • **Priority habitats:** Develop maintenance actions in the areas under restoration to ensure that conditions are created for the normal development of natural habitats. • **Priority habitats:** As per the Project environmental permit (ANANP 2025), in the unlikely event of accidents or interventions that cause damage to conservation measures or the integrity of the protected natural area, Peștera - Deleni SCI (ROSCI0353), Aliman – Adamclisi Special Protection Area (SPA) (ROSPA0001) or Dumbrăveni - Valea Urluia - Lacul Vederoasa Site of Community Importance (SCI) (ROSCI0071), the ANMAP shall be notified within					

Item no.	Requirement	Priority features and relevant mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[14]
		a maximum of 24 hours, and approved restoration shall be carried out.					
BMP 03	Minimise emissions of dust	• **Priority habitats and fauna species:** Vegetation clearing and earthworks should be minimised as much as possible and limited to the strictly needed areas. • **Priority habitats:** All the unpaved surfaces where vehicle movement is to be expected should be kept moist (e.g., through a water sprinkler truck), in particular during dry and windy conditions, to minimize the dust emitted by vehicle entrainment. • **Priority habitats and fauna species:** Speed limits for construction heavy vehicles should not exceed 30 km/h. • **Priority habitats:** Trucks transporting granular/dusty construction materials should not be loaded to full capacity, and should have the load adequately covered. • **Priority habitats:** Stockpiles of granular materials should be protected with a waterproof cover, or alternatively regularly sprinkled with water.	Continuously during construction	EPC contractor	Number of non-compliances reported from the Project plans and documents	No non-compliances reported	Weekly monitoring during construction
BMP 04	Avoid pollution and contamination of soil and water	• **Priority habitats:** Implement the Waste Management Plan and the respective minimisation measures contained therein. • **Priority habitats:** Ensure the correct temporary storage and disposal of the waste produced, according to its typology and in accordance with the legislation in force. Provision must be made for the containment/retention of any run-off/spillages. It is not	Continuously during construction	EPC contractor	Number of non-compliances reported from the Project plans and documents	No non-compliances reported	Weekly monitoring during construction

Item no.	Requirement	Priority features and relevant mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[14]
		permissible to deposit waste, even temporarily, on the banks, beds of water lines and areas of maximum infiltration. • **Priority habitats and fauna species:** Implement the control, containment, and clean-up protocols for any spills of hazardous materials or other pollutants as defined in the Spill Prevention and Emergency Response Plan. Whenever a chemical spill occurs on the ground, the contaminated soil should be collected, stored and sent for final disposal or collection by a licensed operator. • **Priority habitats:** Adequate portable sanitation facilities serving all workers should be provided at construction sites. • **Priority habitats:** The storage of fuels and/or other polluting substances is only permitted in labelled, secured and watertight containers, within the site area prepared for that purpose. • **Priority habitats:** Maintenance and washing of machinery and vehicles should not be carried out in the project area. If indispensable, conditions must be created to ensure that the soil is not contaminated. • **Priority habitats:** Follow all requirements in the Project Pollution Control Plan (PPCP), Spill Prevention and Emergency Response Plan and Contaminated Soil Management Plan (CSMP).					
BMP 05	Minimise direct impacts to, and disturbance of,	• **Priority migratory birds and priority mammals:** Vegetation clearing areas will be scouted in advance of construction by a suitably trained professional with the aim of locating animals or roosting and nesting sites close to the construction area. If any animal is identified, it should be removed and relocated under	Starting prior to the start of works, continuing	EPC contractor with oversight by the Biodiversity Manager and	Number of non-compliances reported from the Project plans and documents	No non-compliances reported	Weekly monitoring during construction

Item no.	Requirement	Priority features and relevant mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[14]
	priority fauna species	licence outside the area to be disturbed, unless they are nesting, in which case a 300-meter buffer zone around nests near project structures will be established in which construction is banned between March 15–August 15, as per the Project environmental permit issued in February 2025 (ANANP 2025; DNV Italy 2026). Prepare a detailed Wildlife Rescue Protocol before the start of the works which focuses on the priority species identified for this Project. See Appendix 2 for further details. • **Priority fauna:** As stated in the Project environmental permit, works will be carried out primarily outside the breeding and rearing seasons for the species of terrestrial fauna for which the Natura 2000 sites have been designated (ANANP 2025). This requirement should also be extended to other less-mobile priority species included in this BMP (see Section 3.1). A good understanding of the seasonal patterns and ecology of the priority species is required to identify key periods and areas to avoid, therefore, collaboration with biodiversity specialists is required. Sensitivity/exclusion maps should be developed for these species, informed by pre-clearance surveys (see Appendix 2). • **Priority fauna:** Minimise impacts by concentrating works in time, especially those that cause the greatest disruption, and avoid conducting construction activities in the evening and at night (i.e. after 22:00). • **Priority fauna:** Implement noise control measures at the source, such as the use of temporary noise barriers and deflectors. Structural and construction solutions for bodies and buildings, and installation of soundproofing systems for equipment or buildings housing the noisiest equipment, should be adopted to ensure compliance with the limits set out in the IFC standards.	throughout construction	input by local ecologists	Number of wildlife collisions with vehicles, using collision incident records. Number of incidents of hunting, poisoning, trapping or harassment of wildlife, using Wildlife hunting / harassment incidents. Number of staff and contractors trained in environmentally-appropriate procedures, using biodiversity-awareness training records.	No wildlife collisions with vehicles No incidents of hunting, poisoning, trapping or harassment of wildlife 100% of staff receive training with biodiversity component in the last 6 months A fauna monitoring	Monthly monitoring during construction Monthly monitoring during construction Monthly monitoring during construction

Item no.	Requirement	Priority features and relevant mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[14]
		• **Priority fauna:** Perform noise monitoring campaigns, conducted by trained specialists, during the construction phase. See World Bank Group (2007) for guidance on acceptable noise levels. • **Priority small mammals and reptiles:** Limit the use of security fencing to laydown areas and site offices only, to limit barriers to movement of the priority mammals and reptile. Avoid placing impermeable fences that could interfere with species movement. Use fences with regular passages (e.g. culverts) or larger mesh sizes, and a ground clearance under the fence that will allow the small priority mammals and reptile to pass. • **Priority small mammals:** As per the Project environmental permit (ANANP 2025), barracks, containers, tanks, eco-toilets, etc. shall be placed on metal beams, wooden planks, bricks, etc., to allow the free movement of small priority mammals and reptiles; and these facilities should be locked when workers are absent to prevent animals from seeking shelter inside them. • **Priority bat species:** Limit illumination in the construction areas as much as practical. Appropriate types of lighting are to be used to avoid attracting insects, and hence, bats. • **Priority raptors:** Avoid attracting birds to predictable food sources, such as on-site or off-site waste disposal areas, or landfills; this is especially relevant for the priority raptors. • **Priority habitats and fauna:** Train staff and contractors in environmentally-appropriate procedures to be followed on site. • **Priority fauna:** Enforce good behaviour by construction workers, including prohibition of hunting, poisoning, trapping and general			Status of fauna monitoring program for construction	program for construction is defined prior to the start of works and is implemented throughout construction	Monthly monitoring during construction

Item no.	Requirement	Priority features and relevant mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[14]
		harassment of wild animals. In the event of the capture of killing of specimens of protected wildlife species, the ANMAP and the competent environmental protection authorities shall be notified immediately (ANANP 2025). • **Priority fauna:** Vehicle traffic in pre-approved construction routes and at low speed (20km/h) in the Project site to reduce the likelihood of road kills of fauna (and to minimise noise disturbance). • **Priority habitats and fauna:** Burning of any green or dry vegetation, stubble, or pasture is prohibited year-round during construction. • **Priority fauna:** No stray dogs will be sheltered at the site, as they may disturb or harm priority mammal species. • **Priority habitats and fauna:** Define a monitoring program during construction, focusing on the priority species for this Project.					
BMP 06	Avoid and minimise the introduction and spread of Invasive Alien Species (IAS)	• **Priority habitats:** Develop an Invasive Species Management Plan, as recommended in the ESIA (DNV Italy 2026) that outlines how to identify, prevent, control, and monitor IAS in the construction area. • **Priority habitats:** Forbid vegetation disturbance outside the set boundaries for each construction site. Limit vegetation clearance to the construction footprint. Avoid clearing any further vegetation in the project boundary as far as possible.	IAS MP developed prior to the start of works, implemented throughout construction	EPC contractor with oversight by the Biodiversity Manager and specialist input by local ecologists	Number of new IAS, using results of IAS monitoring. Number of staff and workers capable of	No new IAS compared to previous quarterly monitoring	Quarterly monitoring during construction Annual monitoring

Item no.	Requirement	Priority features and relevant mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[14]
		• **Priority habitats:** Restrict people and vehicle movements outside project accesses, especially in natural habitat areas. • **Priority habitats:** Limit non-Project vehicles entrance in the construction area to avoid invasive and ruderal species dispersion. • **Priority habitats:** Wash vehicles before they enter site. • **Priority habitats:** Whenever possible, new and temporary access points should be created based in existent access points/routes. • **Priority habitats:** Ensure awareness of staff and workers regarding invasive flora species. • **Priority habitats:** Regularly monitor (at least quarterly) the presence and expansion of invasive flora species in the Project area during construction. This monitoring should be conducted by a qualified local botanist. In case of detection of invasive species, they will be removed mechanically or by hand. • **Priority habitats:** Update relevant plans (e.g. Invasive alien plant species control plan and programme) if IAS are found to be a problem in the Project area.			identifying IAS and reporting new IAS, using staff/worker training records.	>80% of staff capable of identifying IAS and reporting new IAS	during construction
BMP 07	Minimise collision of priority bird species	• **Priority avifauna:** Adequate spacing between wind turbines and bird-sensitive zones (feeding, nesting, migration routes) must be maintained to reduce activity disruption and collision risk. • **Priority avifauna:** Install a camera system to allow for automated Shut-down-on-Demand, such as Identiflight®, to minimise bird	Before the end of construction	Biodiversity Manager with support by specialist contractor	Status of camera system units, using installation records and field verification.	All camera system units signed off as fully operational before the end of construction	Quarterly monitoring during construction

Item no.	Requirement	Priority features and relevant mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[14]
		collisions during operations. Refer to the ESIA (DNV Italy 2026) for recommended specifications of the system.					
BMP 08	Minimise collision of priority bat species	• **Priority bat species:** Install acoustic deterrents on turbines, such as NRG Systems' Bat Deterrent Systems or similar, to minimise bat collisions during operations.	Before the end of construction	EPC contractor with oversight by the Biodiversity Manager	Percentage of turbines that have acoustic deterrents installed, using installation records and field verification.	Acoustic deterrents installed on all turbines by the end of construction	Quarterly monitoring during construction

Table 7. Mitigation measures to be implemented during construction of the transmission line

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[15]
BMP 09	Minimise earthworks and the clearing,	• **Priority habitats and fauna:** Restrict earthworks and the removal of vegetation to agricultural and pasture habitats only (i.e. modified	Starting prior to the start of works,	EPC contractor (all excluding	Percentage of vegetation identified for retention actually retained, using the	100% of planned	Monthly monitoring

[15] According to the Project environmental permit (ANANP 2025), a biodiversity monitoring report shall be submitted to ANANP (now ANMAP as of March 2026) every six months, within 10 working days of the end of the working half-year.

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[15]
	stripping and/or removal of vegetation	habitat), and to the areas strictly necessary for the execution of the works. Avoid the removal of any trees or shrubs. • **Priority habitats:** Although the Project footprint does not directly overlap with any priority habitats listed in Annex I of the EU Habitats Directive, some of these habitats are in close proximity to the site. These areas should be mapped and protected by employing appropriate barrier fencing and/or other forms of demarcations, within which any access or work is prohibited. Habitats for protection include: ○ 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. • **Priority habitats:** Demarcate the servitude for the transmission line on a map and on the ground clearly using high visibility tape for instance, to avoid impacting areas outside of the permitted construction area. • **Priority habitats:** Promote awareness-raising among workers not to harvest or damage plant specimens and address the ecological value of flora, vegetation and natural habitats and train them in environmentally-appropriate procedures to be followed on site. • **Priority habitats:** Vegetation clearing and stripping, and exposure of bare soil should, where possible, be reduced during periods when heavy rainfall is most likely to occur to minimise erosion. • **Priority habitats:** Work should not be carried out when the ground is waterlogged (i.e. during periods of heavy rainfall and immediately	continuing throughout construction	vegetation management) Biodiversity Manager (vegetation management)	change in area of planned vegetation retention in the area of the transmission line. Barriers defined around priority habitats listed in Annex I of the EU Habitats Directive. Barrier fencing (or other forms of demarcation) to be verified in the field. Number of staff and contractors trained in environmentally-appropriate procedures, using biodiversity-awareness training records.	vegetation retained Barriers defined around all priority habitats prior to the start of works 100% of staff receive training with biodiversity component in the last 6 months	during construction Monthly monitoring during construction Monthly monitoring during construction

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[15]
		after rainfall, until the ground has dried out), as per the Project environmental permit (ANANP 2025). • **Priority habitats:** Where possible, employ manual methods (e.g. hoeing or hand-pulling) to clear the ground of vegetation to limit soil and fauna disturbance.					
BMP 10	Restore cleared / stripped / removed vegetation	• **Priority habitats:** Due to the very short length of the transmission line, a dedicated restoration plan is not required. Any impacts to non-arable habitats would be considered in an overall restoration plan (see Section 5.2.1). • **Priority habitats:** Prior to earthmoving works, topsoil should be removed and stockpiled for later re-use in areas affected by the works. • **Priority habitats:** After the works, adequate decompaction of soils that have been compacted by the movement of machinery and vehicles is necessary, thus facilitating the recovery of habitats. • **Priority habitats:** Carry out any landscape restoration necessary, using native vegetation, as soon as possible after the end of construction on temporarily-impacted land and other areas that have been affected by the work (e.g., construction site area, substation surroundings). • **Priority habitats:** Use soil, mulch and vegetation debris (that contains natural seed stock) to facilitate natural revegetation of disturbed areas where reasonably practicable.	Throughout construction, continuing to operations (see Table 9)	EPC contractor with oversight by the Biodiversity Manager	Quality of habitat in any restoration areas of the transmission line, from results of restoration monitoring.	Increase in habitat quality compared to baseline measured at the beginning of restoration	At the end of construction (to be continued during operation (see Table 9)

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[15]
		• **Priority habitats:** Develop maintenance actions in any areas under restoration to ensure that conditions are created for the normal development of natural habitats. • **Priority habitats:** As per the Project environmental permit (ANANP 2025), in the unlikely event of accidents or interventions that cause damage to conservation measures or the integrity of the protected natural area, Peștera - Deleni SCI (ROSCI0353), Aliman – Adamclisi Special Protection Area (SPA) (ROSPA0001) or Dumbrăveni - Valea Urluia - Lacul Vederoasa Site of Community Importance (SCI) (ROSCI0071), the ANMAP shall be notified within a maximum of 24 hours, and approved restoration shall be carried out.					
BMP 11	Minimise emissions of dust	• **Priority habitats:** Vegetation clearing and earthworks should be minimised as much as possible and limited to the strictly needed areas. • **Priority habitats:** All the unpaved surfaces where vehicle movement is to be expected should be kept moist (e.g., through a water sprinkler truck), in particular during dry and windy conditions, to minimize the dust emitted by vehicle entrainment. • **Priority habitats and fauna:** Speed limits for construction heavy vehicles should not exceed 30 km/h. • **Priority habitats:** Trucks transporting granular/dusty construction materials should not be loaded to full capacity, and should have the load adequately covered.	Continuously during construction	EPC contractor	Number of non-compliances reported from the Project plans and documents	No non-compliances reported	Weekly monitoring during construction

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[15]
		• **Priority habitats:** Stockpiles of granular materials should be protected with a waterproof cover, or alternatively regularly sprinkled with water.					
BMP 12	Avoid pollution and contamination of soil and water	• **Priority habitats and fauna:** Implement the Waste Management Plan and the respective minimisation measures contained therein. • **Priority habitats:** Ensure the correct temporary storage and disposal of the waste produced, according to its typology and in accordance with the legislation in force. Provision must be made for the containment/retention of any run-off/spillages. It is not permissible to deposit waste, even temporarily, on the banks, beds of water lines and areas of maximum infiltration. • **Priority habitats and fauna:** Implement the control, containment, and clean-up protocols for any spills of hazardous materials or other pollutants as defined in the Spill Prevention and Emergency Response Plan. Whenever a chemical spill occurs on the ground, the contaminated soil should be collected, stored and sent for final disposal or collection by a licensed operator. • **Priority habitats:** Adequate portable sanitation facilities serving all workers should be provided at construction sites. • **Priority habitats:** The storage of fuels and/or other polluting substances is only permitted in labelled, secured and watertight containers, within the site area prepared for that purpose. • **Priority habitats:** Maintenance and washing of machinery and vehicles should not be carried out in the project area. If indispensable,	Continuously during construction	EPC contractor	Number of non-compliances reported from the Project plans and documents	No non-compliances reported	Weekly monitoring during construction

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[15]
		conditions must be created to ensure that the soil is not contaminated. • **Priority habitats and fauna:** Follow all requirements in the Project Pollution Control Plan (PPCP), Spill Prevention and Emergency Response Plan and Contaminated Soil Management Plan (CSMP).					
BMP 13	Minimise direct impacts to, and disturbance of, priority fauna species	• **Priority habitats and priority fauna:** Vegetation clearing areas will be scouted in advance of construction by a suitably trained professional with the aim of locating animals or roosting and nesting sites close to the construction area. If any animal is identified, it should be removed and relocated under licence outside the area to be disturbed, unless they are nesting, in which case a 300-meter buffer zone around nests near project structures will be established in which construction is banned between March 15–August 15, as per the Project environmental permit issued in February 2025 (ANANP 2025; DNV Italy 2026). Prepare a detailed Wildlife Rescue Protocol before the start of the works which focuses on the priority species identified for this Project. See Appendix 2 for further details. • **Priority fauna:** As stated in the Project environmental permit, works will be carried out primarily outside the breeding and rearing seasons for the species of terrestrial fauna for which the Natura 2000 sites have been designated (ANANP 2025). This requirement should also be extended to other less-mobile priority species included in this BMP (see Section 3.1). A good understanding of the seasonal patterns and ecology of the priority species is required to identify key periods and areas to avoid, therefore, collaboration with biodiversity specialists is required. Sensitivity/exclusion maps should be developed for these species, informed by pre-clearance surveys (see Appendix 2).	Starting prior to the start of works, continuing throughout construction	EPC contractor with oversight by the Biodiversity Manager and input by local ecologists	Number of non-compliances reported from the Project plans and documents Number of wildlife collisions with vehicles, using collision incident records. Number of incidents of hunting, poisoning, trapping or harassment of wildlife, using Wildlife hunting / harassment incidents.	No non-compliances reported No wildlife collisions with vehicles No incidents of hunting, poisoning, trapping or harassment of wildlife	Weekly monitoring during construction Monthly monitoring during construction Monthly monitoring during construction

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[15]
		• **Priority fauna:** Minimise impacts by concentrating works in time, especially those that cause the greatest disruption, and avoid conducting construction activities in the evening and at night (i.e. after 22:00). • **Priority fauna:** Implement noise control measures at the source, such as the use of temporary noise barriers and deflectors. Structural and construction solutions for bodies and buildings, and installation of soundproofing systems for equipment or buildings housing the noisiest equipment, should be adopted to ensure compliance with the limits set out in the IFC standards. • **Priority fauna:** Perform noise monitoring campaigns, conducted by trained specialists, during the construction phase. See World Bank Group (2007) for guidance on acceptable noise levels. • **Priority small mammals and herpetofauna:** Limit the use of security fencing to the essential areas only, to limit barriers to movement of the priority mammals and reptile. Avoid placing impermeable fences that could interfere with species movement. Use fences with regular passages (e.g. culverts) or larger mesh sizes, and a ground clearance under the fence that will allow the small priority mammals and reptile to pass. • **Priority small mammals and herpetofauna:** As per the Project environmental permit (ANANP 2025), barracks, containers, tanks, eco-toilets, etc. should be situated on metal beams, wooden planks, bricks, etc., to allow the free movement of small priority mammals and reptile; and these facilities should be locked when workers are absent to prevent animals from seeking shelter inside them.			Number of staff and contractors trained in environmentally-appropriate procedures, using biodiversity-awareness training records. Status of fauna monitoring program for construction	100% of staff receive training with biodiversity component in the last 6 months A fauna monitoring program for construction is defined prior to the start of works and is implemented throughout construction	Monthly monitoring during construction Monthly monitoring during construction

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[15]
		• **Priority bat species:** Limit illumination in the construction areas as much as practical. Appropriate types of lighting are to be used to avoid attracting insects, and hence, bats. • **Priority raptors:** Avoid attracting birds to predictable food sources, such as on-site or off-site waste disposal areas, or landfills; this is especially relevant for the priority raptors. • **Priority habitats and fauna:** Train staff and contractors in environmentally-appropriate procedures to be followed on site. • **Priority fauna:** Enforce good behaviour by construction workers, including prohibition of hunting, poisoning, trapping and general harassment of wild animals. In the event of the capture of killing of specimens of protected wildlife species, the ANMAP and the competent environmental protection authorities shall be notified immediately (ANANP 2025). • **Priority fauna:** Vehicle traffic in pre-approved construction routes and at low speed (20km/h) in the Project site to reduce the likelihood of road kills of fauna (and to minimise noise disturbance). • **Priority habitats and fauna:** Burning of any green or dry vegetation, stubble, or pasture is prohibited year-round during construction. • **Priority fauna:** No stray dogs will be sheltered at the site, as they may disturb or harm priority mammal species. • **Priority habitats and fauna:** Define a monitoring program during construction, focusing on the priority species for this Project.					

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[15]
BMP 14	Avoid and minimise the introduction and spread of Invasive Alien Species (IAS)	• **Priority habitats:** Develop an Invasive Species Management Plan, as recommended in the ESIA (DNV Italy 2026) that outlines how to identify, prevent, control, and monitor IAS in the construction area. • **Priority habitats:** Forbid vegetation disturbance outside the set boundaries for each construction site. Limit vegetation clearance to the construction footprint. Avoid clearing any further vegetation in the project boundary as far as possible. • **Priority habitats:** Restrict people and vehicle movements outside project accesses, especially in natural habitat areas. • **Priority habitats:** Limit non-Project vehicles entrance in the construction area to avoid invasive and ruderal species dispersion. • **Priority habitats:** Wash vehicles before they enter site. • **Priority habitats:** Whenever possible, new and temporary access points should be created based in existent access points/routes. • **Priority habitats:** Ensure awareness of staff and workers regarding invasive flora species. • **Priority habitats:** Regularly monitor (at least quarterly) the presence and expansion of invasive flora species in the transmission line route during construction. This monitoring should be conducted by a qualified local botanist. In case of detection of invasive species, they will be removed mechanically or by hand.	IAS MP developed prior to the start of works, implemented throughout construction	EPC contractor with oversight by the Biodiversity Manager and specialist input by local ecologists	Number of new IAS, using results of IAS monitoring. Number of staff and workers capable of identifying IAS and reporting new IAS, using staff/worker training records.	No new IAS compared to previous quarterly monitoring >80% of staff capable of identifying IAS and reporting new IAS	Quarterly monitoring during construction Annual monitoring during construction

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[15]
		• **Priority habitats:** Update relevant plans (e.g. Invasive alien plant species control plan and programme) if IAS are found to be a problem in transmission line route.					
BMP 15	Minimise collision of priority bird species	• **Priority avifauna:** Bird flight diverters (BFDs) should be installed on all the overhead line sections for the full span length and on guyed meteorological masts according to the applicable International Best Practice standards at the time (e.g., Martín Martín *et al.* 2022; McGowan 2024; IFC & EBRD 2026). • **Priority avifauna:** Underground cabling should be used as much as is practically possible, to minimise risk of powerline collisions.	Throughout construction	EPC contractor with oversight by the Biodiversity Manager	Extent of bird flight diverter installation, , using installation records and field verification. Extent of underground cabling used, using cabling installation records and field verification.	Bird flight diverters installed on the full length of all OHTL by end of construction. Underground cabling used where	Quarterly monitoring during construction Quarterly monitoring during construction
BMP 16	Minimise electrocution of priority bird species	• **Priority avifauna:** If the use of Overhead Transmission Lines (OHTLs) is unavoidable due to technical reasons, the Avifaunal Specialist must be consulted timeously to ensure that a raptor friendly pole design is used (e.g. Martín Martín et al. 2022), and that appropriate mitigation is implemented pro-actively for complicated pole structures. The final design must be approved by an avian specialist. • **Priority avifauna** The OHTL must be insulated to avoid bird electrocution. Insulating materials will be installed near supports and conductors on poles to reduce electrocution risk.	Throughout construction	EPC contractor with oversight by the Biodiversity Manager and input by local ecologists	Raptor friendly pole design used, using design records with verification by Biodiversity Manager. OHTL and supports/conductors are insulated, using insulation records and field verification.	Raptor friendly pole design used, and appropriate mitigation implemented for complicated pole structures OHTL and supports/conductors are fully insulated by the end of construction	Quarterly monitoring during construction Quarterly monitoring during construction

5.2.3 Operation phase

The mitigation measures to be implemented during the operations phase are described in Table 8 and Table 9. The mitigations measures cover a range of temporary and permanent impacts that are expected to occur from the operation of the wind farm site and associated transmission line. A range of good-practice mitigation actions were included in the Project's ESIA (DNV Italy 2026), along with other Project documents such as the environmental permit (ANANP 2025), and are summarised in Table 8 and 9. Additional measures were provided by TBC where necessary, incorporating GIIP mitigation actions, including those from the World Bank Group Environmental, Health, and Safety (EHS) General Guidelines, and EHS Guidelines for Wind Energy (World Bank Group 2007, 2015), and the guidelines for mitigating biodiversity impacts associated with solar and wind energy development (Bennun *et al.* 2021). The ultimate implementation and oversight of the measures are under the responsibility of the Operation and Maintenance (O&M) Contractor.

The priority habitats and species referred to in the following tables are those identified in Section 3.1 above.

Table 8: Mitigation measures to be implemented during operation of the wind farm

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[16]
BMP 17	Restore cleared, stripped, removed or degraded vegetation	• **Priority habitats:** Any post-construction restoration of affected areas should be continued into operation. Implement restoration according to the Landscape Restoration Plan, and using native, site-specific and non-invasive species. • **Priority habitats:** Develop maintenance and monitoring actions in any areas under restoration to ensure that conditions are created for the normal development of natural habitats.	Throughout operations	O&M contractor with oversight by the Biodiversity Manager	Quality of habitat in the restoration areas of the wind farm site, from results of restoration monitoring.	Increase in habitat quality compared to baseline measured at the beginning of restoration	Once per year in the first 5 years of operation (in mid-spring), then every 3 years until year 20
BMP 18	Minimise further clearing, stripping, removal and/or degradation of vegetation	• **Priority habitats and fauna:** Limit the removal of additional vegetation to the designated maintenance areas, and avoid vegetation removal or disturbance in areas of natural habitat. • **Priority habitats:** Promote awareness-raising among workers not to harvest or damage plant specimens and address the ecological value of flora, vegetation and natural habitats and train them in environmentally-appropriate procedures to be followed on site.	Throughout operations	Biodiversity Manager (vegetation management) O&M contractor (worker training)	Percentage of vegetation identified for retention actually retained, using the change in area of planned vegetation retention within the wind farm site. Number of staff and contractors trained in environmentally-appropriate procedures,	100% of planned vegetation retained 100% of staff receive training with biodiversity component in the last 6 months	Once per year for first 3 years of operation, and every 3 years thereafter Monthly monitoring during operation

[16] According to the Project environmental permit (ANANP 2025), a biodiversity monitoring report shall be submitted to ANANP (now ANMAP as of March 2026) every six months, within 10 working days of the end of the working half-year.

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[16]
					using biodiversity-awareness training records.		
BMP 19	Avoid pollution and contamination of soil and water	• **Priority habitats and fauna:** Ensure the correct temporary storage and disposal of the any waste produced during maintenance activities, according to its typology and in accordance with the legislation in force. Provision must be made for the containment/retention of any run-off/spillages. • **Priority habitats and fauna:** Implement the control, containment, and clean-up protocols for any spills of hazardous materials or other pollutants as defined in the Spill Prevention and Emergency Response Plan. Whenever a chemical spill occurs on the ground, the contaminated soil should be collected, stored and sent for final disposal or collection by a licensed operator. • **Priority habitats:** Adequate portable sanitation facilities serving all workers should be provided at maintenance sites. • **Priority habitats:** The storage of fuels and/or other polluting substances is only permitted in labelled, secured and watertight containers, within the site area prepared for that purpose. • **Priority habitats:** Maintenance and washing of machinery and vehicles should not be carried out in the project area. If indispensable, conditions must be created to ensure that the soil is not contaminated.	Continuously throughout operations	O&M contractor	Number of non-compliances reported from the Project plans and documents	No non-compliances reported	Monthly monitoring during operation

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[16]
		• **Priority habitats and fauna:** Follow all requirements in the Project Pollution Control Plan (PPCP), Spill Prevention and Emergency Response Plan and Contaminated Soil Management Plan (CSMP).					
BMP 20	Avoid and minimise the introduction and spread of Invasive Alien Species (IAS)	• **Priority habitats:** Forbid vegetation disturbance outside the designated maintenance boundary. • **Priority habitats:** Restrict people and vehicle movements outside project accesses, and forbid movement in areas of natural habitat. • **Priority habitats:** Limit non-Project vehicles entrance into the site, through the use of signage, to avoid invasive and ruderal species dispersion. • **Priority habitats:** Whenever possible, new and temporary access points should be created based in existent access points/routes. • **Priority habitats:** Existing access roads will be used as much as possible to avoid additional vegetation disturbance. • **Priority habitats:** Ensure awareness of staff and workers regarding invasive flora species. • **Priority habitats:** Update the Invasive alien plant species control plan and programme if invasive species are found to be a problem in the Project area. Regularly monitor the presence and expansion of invasive flora species in the Project	Continuously throughout operations	O&M contractor with oversight by the Biodiversity Manager and specialist input by local ecologists	Number of new IAS, using results of IAS monitoring. Number of maintenance workers capable of identifying IAS and reporting new IAS, using staff/worker training records.	No new IAS compared to previous quarterly monitoring >80% of staff capable of identifying IAS and reporting new IAS	Every six months in first 3 years, then once per year thereafter Once per year during operations

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[16]
		area during operation. This monitoring should be conducted by a qualified local botanist.					
BMP 21	Minimise direct impacts to, and disturbance of, priority fauna species	• **Priority fauna:** Avoid conducting maintenance activities in the evening and at night (i.e. after 22:00). • **Priority bat species:** Lighting of wind turbines should be reduced to the minimum recommended for aviation safety. Appropriate types of lighting are to be used to avoid attracting insects, and hence, bats. • **Priority raptor species:** Avoid attracting birds to predictable food sources, such as on-site or off-site waste disposal areas, or landfills; this is especially relevant for the priority raptors. • **Priority habitats and fauna:** Train maintenance staff and contractors in environmentally-appropriate procedures to be followed on site. • **Priority fauna:** Enforcing good behaviour by maintenance workers, including prohibition of hunting, poisoning, trapping and general harassment of wild animals. In the event of the capture of killing of specimens of protected wildlife species, the ANMAP and the competent environmental protection authorities shall be notified immediately (ANANP 2025). • **Priority fauna:** Vehicle traffic in pre-approved maintenance routes and at low speed (20km/h) in the Project site to reduce the likelihood of road kills of fauna (and to minimise noise disturbance).	Continuously throughout operations	O&M contractor with oversight by the Biodiversity Manager	Number of non-compliances reported from the Project plans and documents Number of wildlife collisions with vehicles, using collision incident records. Number of incidents of hunting, poisoning, trapping or harassment of wildlife, using Wildlife hunting / harassment incidents. Number of maintenance workers trained in environmentally-appropriate procedures, using biodiversity-awareness training records.	No non-compliances reported No wildlife collisions with vehicles No incidents of hunting, poisoning, trapping or harassment of wildlife 100% of staff receive training with biodiversity component in the last 6 months	Monthly monitoring during operation Monthly monitoring during operation Monthly monitoring during operation Monthly monitoring during operation

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[16]
		• **Priority habitats and fauna:** Burning of any green or dry vegetation, stubble, or pasture is prohibited year-round throughout operations.					
BMP 22	Minimise collision of priority bird species	• **Priority avifauna:** Lighting of wind turbines should be reduced to the minimum recommended for aviation safety to avoid attracting birds. • **Priority avifauna:** Implement an Automated Shut-down-on-Demand (SDoD) system for turbines using the camera system, such as IdentiFflight®. Refer to the ESIA (DNV Italy 2026) for recommended specifications of the system. • **Priority avifauna:** All wind turbines should have one blade painted according to a local civil aviation authority approved pattern (if available), recognising that evidence of blade painting as an effective collision minimisation measure is limited. • **Priority avifauna:** Implement bird Post-construction Fatality Monitoring (PCFM) throughout entire lifetime of the Project. • **Priority avifauna:** An adaptive management process should be implemented.	Continuously throughout operations	O&M contractor with oversight by the Biodiversity Manager and support from specialist contractor	Success of bird fatality mitigation, as indicated by the number of fatalities per priority bird species due to collision with turbines, from the PCFM results.	No fatalities above the thresholds established for each priority bird species (thresholds to be defined in a Biodiversity Action Plan)	PCFM, including frequency of data collection, will follow the process described in the PCFM Good Practice Handbook launched in 2023 (IFC et al. 2023).
BMP 23	Minimise collision of priority bat species	• **Priority bat species:** Lighting of wind turbines should be reduced to the minimum recommended for aviation safety to avoid attracting bats. Minimise other light sources as far as possible.	Continuously throughout operations	O&M contractor with oversight by the Biodiversity Manager and	Success of bat fatality mitigation, as indicated by the number of fatalities per priority bat species due to	No fatalities above the thresholds established for each priority bat species (thresholds to be defined in a	PCFM, including frequency of data collection, will follow the process described in the PCFM Good

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[16]
		• **Priority bat species:** Use appropriate types of lighting to avoid attracting insects, and hence bats. • **Priority bat species:** All wind turbines are to be subjected to standard blade feathering, throughout the lifespan of the project. • **Priority bat species:** Turbines will be shut down during periods of low wind speeds (<6 m/s) and high bat activity (spring migration, juvenile emergence, fall migration), as per the Project environmental permit issued in February 2025. • **Priority bat species:** Conduct bat activity monitoring in the wind farm site at least once every five years, using acoustic detection devices installed on the turbines. • **Priority bat species:** Implement bat Post-construction Fatality Monitoring (PCFM) throughout entire lifetime of the Project. • **Priority bat species:** An adaptive management process should be implemented.		input by local ecologists	collision with turbines, from the PCFM results.	Biodiversity Action Plan)	Practice Handbook launched in 2023 (IFC et al. 2023).

Table 9. Mitigation measures to be implemented during operation of the transmission line

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[17]
BMP 24	Restore cleared, stripped, removed or degraded vegetation	• **Priority habitats:** Any post-construction restoration of affected areas should be continued into operation. Implement restoration according to the Landscape Restoration Plan, and using native, site-specific and non-invasive species. • **Priority habitats:** Develop maintenance and monitoring actions in any areas under restoration to ensure that conditions are created for the normal development of natural habitats.	Throughout operations	O&M contractor with oversight by the Biodiversity Manager	Quality of habitat in the restoration areas of the transmission line route, from results of restoration monitoring.	Increase in habitat quality compared to baseline measured at the beginning of restoration	Once per year in the first 5 years of operation (in mid-spring), then every 3 years until year 20
BMP 25	Minimise further clearing, stripping, removal and/or degradation of vegetation	• **Priority habitats and fauna:** Limit the removal of additional vegetation to the designated maintenance areas (i.e. the transmission line right-of-way (RoW)), and avoid vegetation removal or disturbance in areas of natural habitat. • **Priority habitats:** Promote awareness-raising among workers not to harvest or damage plant specimens and address the ecological value of flora, vegetation and natural habitats and train them in environmentally-appropriate procedures to be followed on site.	Throughout operations	Biodiversity Manager (vegetation management) O&M contractor (worker training)	Percentage of vegetation identified for retention actually retained, using the change in area of planned vegetation retention within the wind farm site. Number of staff and contractors trained in environmentally-appropriate procedures, using biodiversity-	100% of planned vegetation retained 100% of staff receive training with biodiversity component in the last 6 months	Once per year for first 3 years of operation, and every 3 years thereafter Monthly monitoring during operation

[17] According to the Project environmental permit (ANANP 2025), a biodiversity monitoring report shall be submitted to ANANP (now ANMAP as of March 2026) every six months, within 10 working days of the end of the working half-year.

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[17]
					awareness training records.		
BMP 26	Avoid pollution and contamination of soil and water	• **Priority habitats and fauna:** Ensure the correct temporary storage and disposal of the any waste produced during maintenance activities, according to its typology and in accordance with the legislation in force. Provision must be made for the containment/retention of any run-off/spillages. • **Priority habitats and fauna:** Implement the control, containment, and clean-up protocols for any spills of hazardous materials or other pollutants as defined in the Spill Prevention and Emergency Response Plan. Whenever a chemical spill occurs on the ground, the contaminated soil should be collected, stored and sent for final disposal or collection by a licensed operator. • **Priority habitats:** Adequate portable sanitation facilities serving all workers should be provided at maintenance sites. • **Priority habitats:** The storage of fuels and/or other polluting substances is only permitted in labelled, secured and watertight containers, within the site area prepared for that purpose. • **Priority habitats:** Maintenance and washing of machinery and vehicles should not be carried out in the project area. If indispensable, conditions must be created to ensure that the soil is not contaminated. • **Priority habitats and fauna:** Follow all requirements in the Project Pollution Control Plan (PPCP), Spill Prevention and	Continuously throughout operations	O&M contractor	Number of non-compliances reported from the Project plans and documents	No non-compliances reported	Monthly monitoring during operation

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[17]
		Emergency Response Plan and Contaminated Soil Management Plan (CSMP).					
BMP 27	Avoid and minimise the introduction and spread of Invasive Alien Species (IAS)	• **Priority habitats:** Forbid vegetation disturbance outside the designated maintenance boundary (i.e. the transmission line RoW). • **Priority habitats:** Restrict people and vehicle movements outside project accesses, and forbid movement in areas of natural habitat. • **Priority habitats:** Limit non-Project vehicles entrance into the site, through the use of signage, to avoid invasive and ruderal species dispersion. • **Priority habitats:** Whenever possible, new and temporary access points should be created based in existent access points/routes. • **Priority habitats:** Existing access roads will be used as much as possible to avoid additional vegetation disturbance. • **Priority habitats:** Ensure awareness of staff and workers regarding invasive flora species. • **Priority habitats:** Update the Invasive alien plant species control plan and programme if invasive species are found to be a problem in the Project area. Regularly monitor the presence and expansion of invasive flora species in the Project area during operation. This monitoring should be conducted by a qualified local botanist.	Continuously throughout operations	O&M contractor with oversight by the Biodiversity Manager and specialist input by local ecologists	Number of new IAS, using results of IAS monitoring. Number of maintenance workers capable of identifying IAS and reporting new IAS, using staff/worker training records.	No new IAS compared to previous quarterly monitoring >80% of staff capable of identifying IAS and reporting new IAS	Every six months in first 3 years, then once per year thereafter Once per year during operations

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[17]
BMP 28	Minimise direct impacts to, and disturbance of, priority fauna species	• **Priority fauna:** Avoid conducting maintenance activities in the evening and at night (i.e. after 22:00). • **Priority habitats and fauna:** Train maintenance staff and contractors in environmentally-appropriate procedures to be followed on site. • **Priority fauna:** Enforcing good behaviour by maintenance workers, including prohibition of hunting, poisoning, trapping and general harassment of wild animals. In the event of the capture of killing of specimens of protected wildlife species, the ANMAP and the competent environmental protection authorities shall be notified immediately (ANANP 2025). • **Priority fauna:** Vehicle traffic in pre-approved maintenance routes and at low speed (20km/h) in the Project site to reduce the likelihood of road kills of fauna (and to minimise noise disturbance). • **Priority habitat and fauna:** Burning of any green or dry vegetation, stubble, or pasture is prohibited year-round throughout operations.	Continuously throughout operations	O&M contractor with oversight by the Biodiversity Manager	Number of non-compliances reported from the Project plans and documents Number of incidents of hunting, poisoning, trapping or harassment of wildlife, using Wildlife hunting / harassment incidents. Number of maintenance workers trained in environmentally-appropriate procedures, using biodiversity-awareness training records. Number of wildlife collisions with vehicles, using collision incident records.	No non-compliances reported No incidents of hunting, poisoning, trapping or harassment of wildlife 100% of staff receive training with biodiversity component in the last 6 months No wildlife collisions with vehicles	Monthly monitoring during operation Monthly monitoring during operation Monthly monitoring during operation Monthly monitoring during operation
BMP 29	Minimise collision of priority bird species	• **Priority avifauna:** Bird flight diverters (BFDs) should be checked and replaced, if needed, throughout the entire lifetime of the Project.	BFD installation prior to the start of operations, PCFM	O&M contractor with oversight by the Biodiversity Manager and	Success of bird fatality mitigation, as indicated by the number of fatalities per priority bird species due to collision with the	No fatalities above the thresholds established for each priority bird species (thresholds to be defined in a	PCFM, including frequency of data collection will follow the process described in the PCFM Good Practice Handbook

Item no.	Requirement	Mitigation measure(s)	Timing	Responsibility	Monitoring measure / KPI and information required	Target	Monitoring / data collection frequency[17]
		• **Priority avifauna:** Implement bird Post-construction Fatality Monitoring (PCFM) throughout the entire lifetime of the Project.	throughout operations	input by local ecologists	transmission line, from the PCFM results.	Biodiversity Action Plan)	launched in 2023 (IFC et al. 2023).
BMP 30	Minimise electrocution of priority bird species	• **Priority avifauna:** Implement bird Post-construction Fatality Monitoring (PCFM) throughout the entire lifetime of the Project.	Device / material installation prior to the start of operations, PCFM throughout operations	O&M contractor with oversight by the Biodiversity Manager and input by local ecologists	Success of bird fatality mitigation, as indicated by the number of fatalities per priority bird species due to electrocution from the transmission line, from the PCFM results.	No fatalities above the thresholds established for each priority bird species (thresholds to be defined in a Biodiversity Action Plan)	PCFM, including frequency of data collection will follow the process described in the PCFM Good Practice Handbook launched in 2023 (IFC et al. 2023).

5.3 Roles and responsibilities

Table 10 indicates the key roles and responsibilities expected for the implementation of the BMP during the construction and operation phases. As the Project developer, Midmar Callatis will have the overall responsibility of implementing this BMP. However, the primary responsibility of implementing the BMP mitigation measures and monitoring lies with Engineering, Procurement, Construction (EPC) Contractor during the construction phase and with the Operation and Maintenance (O&M) Contractor during the operation phase.

The EPC and O&M Contractors will have suitably qualified staff with sufficient biodiversity knowledge to be able to understand and implement the measures in this BMP. Where appropriate, external biodiversity specialists will be used to help with the implementation of some mitigation and monitoring measures, and with the analysis and interpretation of biodiversity data.

Table 10: Roles and responsibilities

Role	Responsibility
Midmar Callatis	• Employ a Biodiversity Manager with a strong ecology background and experience in managing wind-wildlife programs and reporting results. Allocate sufficient resources to achieve effective implementation of the BMP. • During the construction phase, oversee Contractor programs for monitoring and audits as specified in this BMP, generate the appropriate reports and oversee any corrective actions. • Coordinate biodiversity-related activities in response to routine or emerging issues during the construction phase of the Project. • Collect Contractor monitoring reports promptly during the construction phase of the Project. • Call in specialists to consult on special problems or to conduct third-party audits as needed during the construction phase of the Project. • Ensure that training programs informing workers of the species and habitats of concern are held.
EPC Contractor (during construction only)	• Undertake the planning, implementation and monitoring of all mitigation measures in the BMP and any associated or complementary plans during the construction phase of the Project. • Employ dedicated biodiversity resource to oversee the terrestrial works. The biodiversity resource may coincide with the EPC's Environmental Manager role where biodiversity/ecology qualifications and experience can be demonstrated. • Ensure sufficient resources are allocated to achieve effective implementation of this Plan. • Prepare survey/monitoring reports during construction as required by this BMP.
O&M Contractor (during operation only)	• Undertake the planning, implementation and monitoring of all mitigation measures in the BMP and any associated or complementary plans during the operation phase of the Project. • Ensure sufficient resources are allocated to achieve effective implementation of this Plan. • Prepare monitoring reports during operation as required by this BMP.

Role	Responsibility
Biodiversity Manager (BM)	• Oversee the correct implementation of all mitigation measures for the construction and operation phases which are detailed in the BMP (see Table 6-9), and in any associated plans (see Section 5.2.1). • Oversee and ensure the high standard of work and the timely submission of deliverables assigned to the EPC and O&M Contractor's biodiversity resource. • Review the outcomes of the pre-clearance surveys (refer to Appendix 2). • Ensure high-value conservation habitats are marked to avoid clearance (refer to Table 6 and 7). • Oversee rescue and relocation of potentially impacted species (refer to Appendix 2). • Oversee site clearance activities within agreed development footprint (including demarcation of sensitive sites). • Oversee ecological requirements for the construction, operation and decommissioning of temporary construction facilities. • Oversee habitat restoration and rehabilitation. • Ensure that vegetation control (e.g. invasive plants) does not occur outside the designated maintenance boundary. • Undertake periodic reviews of the BMP and related plans (including the BAP) based on monitoring results and adaptive management needs. • Oversee the preparation and submission of the six-monthly biodiversity monitoring report to Agentia Nationala pentru Mediu si Arii Protejate (ANMAP) within 10 working days from the end of each half-year, in compliance with the Project environmental permit (ANANP, 2025).

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Appendix 1 Lender Standards

The objectives of IFC PS6 and EBRD ESR6 are to protect and conserve biodiversity, 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. IFC PS6 requirements depend on the classification of Project area in three classes based on condition and significance for biodiversity. These three classes are:

- Modified Habitat
- Natural Habitat
- Critical Habitat

IFC PS6 defines Natural Habitats 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". Monoculture plantations, intensive agricultural areas and urban areas show substantial modification and are classified as Modified Habitat.

Areas of "high biodiversity value" are termed Critical Habitat by IFC. Such a designation is based on the presence and/or quantity of significant types of biodiversity (e.g. threatened species, highly threatened ecosystems etc) and is independent of the condition of the habitat.

EBRD ESR6 also requires assessment of Critical Habitat. The criteria to consider when assessing the presence of Critical Habitat, according to IFC PS6 (IFC 2019b) and EBRD ESR6 (EBRD 2025), 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)

The criteria for defining Critical Habitat under IFC PS6 are slightly different to the criteria under EBRD PR6 (EBRD 2025). For example, ESR6 includes habitats listed under Annex I of the EU Habitats Directive (European Union 1992) or Resolution 4 of the Bern Convention (Council of Europe 1979), as well as species listed in Annex II of Habitats Directive (European Union 1992), whereas IFC PS6 does not.

In addition, IFC PS6 states that certain internationally recognised areas of high biodiversity value are likely to be classified as Critical Habitat.

IFC PS6 compliant projects must achieve No Net Loss (NNL) for Natural Habitats and Net Gain (NG) for Critical Habitat values. IFC PS6 also requires projects in Protected Areas and internationally recognized areas to be developed in line with any government recognized management plans, be legally permitted, and implement additional programs to promote and enhance the conservation aims and effective management of the area.

In addition to Critical Habitat values, EBRD ESR6 also considers a suite of Priority Biodiversity Features (PBFs) which are of lower concern, but still important for a project to consider. PBFs include: threatened ecosystems, threatened species, range-restricted species, and migratory species (EBRD 2025). It is good practice for Projects to aim for NNL of PBFs. The requirements of EBRD ESR6 when a project may have adverse impacts on PBFs are shown in Table A.4.

The presence of critical habitat does not necessarily imply an impact from the project. Table A.1 shows the requirements of IFC PS6 paragraph 17 and 18, with respect to critical habitat[1]. EBRD has similar requirements shown in Table A.2.

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

Table A.1. 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'.

Table A.2. EBRD ESR6 paragraph 15 on critical habitat.

ESR6 reference	PS6 text
ESR6 paragraph 15	Critical habitat will not be further fragmented, converted or degraded to the extent that its ecological integrity or biodiversity importance is compromised. Consequently, in areas of critical habitat, the client will not implement any project activities unless the following conditions are met:

[1] IFC is generally the most stringent of the lenders in regard to Critical Habitat.

	• **no other viable alternatives** within the region exist for development of the project in habitats of lesser biodiversity value • stakeholders are consulted in accordance with ESR 10 • the project is permitted under applicable environmental laws, recognising the priority biodiversity features • the project **does not lead to measurable adverse impacts**[87] on those biodiversity features for which the critical habitat was designated, as outlined in paragraph 14 • the project is designed to **deliver net gains for the critical habitat** impacted by the project, with monitoring systems to demonstrate them • the project **is not anticipated to lead to a net reduction** in the population of any endangered or critically endangered species, over a reasonable time period • a robust and appropriately designed**, long-term biodiversity monitoring and evaluation programme** aimed at assessing the status of critical habitat is integrated into the client's adaptive management programme.
ESR6 paragraph 16	In cases where a client is able to meet the requirements set out in paragraph 15, the project's mitigation strategy, **including net gain**, will be described in a **biodiversity management plan and/or biodiversity action**
Footnote 87	Measurable adverse impacts mean the project's direct and indirect impacts will jeopardise the persistence within the study area of any biodiversity value that triggers a critical habitat designation.

Table A.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).

Table A.4. EBRD PSR6 requirements where the project may have adverse impact on Priority Biodiversity Features

PS6 reference	PS6 text
ESR6 paragraph 13	Where the assessment has identified that the project could have significant, adverse and irreversible impacts on priority biodiversity features, the client will not implement any project-related activities unless: • The client can demonstrate that there are no technically and economically feasible alternatives. • Stakeholders are consulted in accordance with ESR 10. • The project is permitted under applicable environmental laws, recognizing the priority biodiversity features. • Appropriate mitigation measures are put in place, in accordance with the mitigation hierarchy, to ensure no net loss[85] and preferably a net gain of priority biodiversity features and the habitats and ecological functions that support them over the long term to achieve measurable conservation outcomes.
Footnote 85	"No net loss" is defined as the point at which project-related biodiversity losses are balanced by gains resulting from measures taken to avoid and minimise these impacts, to undertake on-site restoration and to offset significant residual impacts, if any, on an appropriate geographic scale.

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).

Appendix 2 Pre-clearance Survey

Pre-clearance surveys should be performed immediately prior to any on-site activity starting, no more than 6 months before clearing. The key objective of these surveys will be to validate the Project's baseline data and to identify and map relevant biodiversity features within the Project footprint, including permanent and temporary occupation areas. Particular attention must be given to detecting the presence of any priority species within the Project footprint, including any priority bird species nesting, and priority bat species roosting, in the Project area (see section 3.1).

The pre-clearance surveys should be performed by suitably trained and qualified biodiversity specialists with local experience and experience of conducting breeding bird surveys. The Biodiversity Manager should also be present during the surveys. Where possible, the pre-clearance surveys should be performed during the main breeding season for the priority bird species to maximise chances of observing nests. The location of all active nests for priority bird species should be recorded. Any potential bat roosts, such as old buildings or trees, should be inspected for the presence of bats, including the species identification and counting of detected individuals. The location of any burrows of priority mammals or reptiles should also be recorded.

If any animal is identified, it should be removed and relocated under licence[1] outside the area to be disturbed, unless they are breeding/nesting, in which case a 300-meter buffer zone around nests near project structures will be established in which construction is banned between March 15–August 15, as per the Project environmental permit issued in February 2025 (ANANP 2025; DNV Italy 2026). The EPC contractor should prepare a detailed Wildlife Rescue Protocol before the start of the works, which focuses on the priority species identified for this Project.

The pre-clearance survey will allow confirmation on the following:

- Type of vegetation/habitats located within the Project footprint (wind farm site and associated infrastructure). The extant to be cleared should be mapped.
- Identification and mapping of species of interest, including any evidence of the presence, location and activity of priority species for the Project, particularly any breeding/nesting or roosting priority species.
- Areas of priority habitats to be avoided (these should be clearly mapped).

Main results from pre-clearance surveys are expected to be:

- Detailed cartographic information of the Project footprint

[1] According to OUG 57/2007, the unlicenced handling of animals is forbidden for species included in annexes of EU Habitats/Birds Directives or protected in Romania (Annexes 4A and 4B of OUG 57/2007). Licenses can be obtained in advance of animal relocations, specifying species and numbers.

- Identification and mapping of:
    - Invasive Alien Species (IAS) (if found);
    - vegetation and specific land uses;
    - erosion areas.
- Identification and locations of any priority species present within the Project footprint

In addition to the above, these site visits will allow (1) the evaluation of potential micro-siting and project refinement (if needed) and (2) implementation of operational and long-term monitoring.

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
Linaria cannabina	Common Linnet	LC	All migratory species in the area of impact

Scientific name	Common name	Global RL status	PBF Criteria
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
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

Scientific name	Common name	Global RL status	PBF Criteria
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
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

Scientific name	Common name	Global RL status	PBF Criteria
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
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

Scientific name	Common name	Global RL status	PBF Criteria
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
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

Scientific name	Common name	Global RL status	PBF Criteria
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
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

Scientific name	Common name	Global RL status	PBF Criteria
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