International ESIA for an Integrated Renewable Energy Project

180MW Wind Power and Battery Energy Storage System, Tsogttsetsii soum, Mongolia

Annex B: Critical Habitat Assessment

PREPARED FOR

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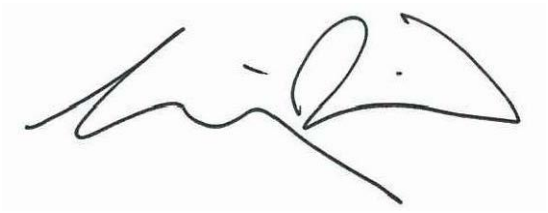
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ACRONYMS AND ABBREVIATIONS

Acronym	Description
AoI	Area of Influence
BAP	Biodiversity Action Plan
CHA	Critical Habitat Assessment
CR	Critically Endangered
DD	Data Deficient
DEIA	Detailed Environmental Impact Assessment
EAAA	Ecologically Appropriate Area(s) of Analysis
EN	Endangered
EOO	Extent of Occurrence
ESIA	Environmental and Social Impact assessment
GN	Guidance Note
IBA	Important Bird and Biodiversity Area
IBAT	Integrated Biodiversity Assessment Tool
IFC	International Finance Corporation
IFC PS6	International Finance Corporation: Performance Standard 6 (Biodiversity Conservation and Sustainable Management of Living Natural Resources)

Acronym	Description
IUCN	International Union for Conservation of Nature
KBA	Key Biodiversity Area
LC	Least Concern
MW	Mega Watt
NE	Not Evaluated
NT	Near Threatened
PS	Performance Standards
SPA	Strictly Protected Area
VU	Vulnerable
WWF	World Wildlife Fund

B1. INTRODUCTION

ERM-Hong Kong Ltd. (ERM) has been commissioned by Net Zero Energy (NZE) to conduct a Critical Habitat Assessment (CHA) for a 180 MW onshore wind farm (the "Project") in Tsogttsetsii Soum, Umnugobi Province, Mongolia (the "Site"), as part of the preparation of the Environmental and Social Impact Assessment (ESIA). This CHA has been conducted in accordance with the International Finance Corporation's (IFC) Performance Standard (PS) 6 on Biodiversity Conservation and Sustainable Management of Living Natural Resources (2012) and the European Bank for Reconstruction and Development (EBRD) Environmental and Social Requirement 6 (ESR6). The purpose of the CHA is to determine the presence of Critical Habitat *(CH)-qualifying biodiversity features and/or Priority Biodiversity Features (PBFs), which will* warrant more specific mitigation planning under IFC PS6 and EBRD ESR6.

An initial Critical Habitat (CH) screening exercise was carried out as part of the Scoping process for the ESIA. This Critical Habitat Assessment (CHA) was completed considering all species screened during the process and the results of six baseline surveys conducted between August 2024 and May 2025.

The key objectives of this CHA are as follows:

- Assess the presence of any CH-qualifying biodiversity values and/or PBFs associated with the Project based on a review of Project information, available data and scientific literature, and primary data collected from field assessments conducted for the Project;
- Present the results and implications of the CHA findings for the Project; and
- Identify the recommended next steps to meet the requirements of IFC PS6 and EBRD ESR6.

B1.1 PROJECT DESCRIPTION

The area in which the Project's wind turbine generators are located is in Umnugobi (also written as Ömnögovi, and Mongolian: Өмнөговь) Province in southern Mongolia, in the district (Mongolian: soum) of Tsogttsetsii (Mongolian: Цогтцэций) and is approximately 60 km from the Oyu Tolgoi (OT) Mine to which the overhead transmission line will connect.

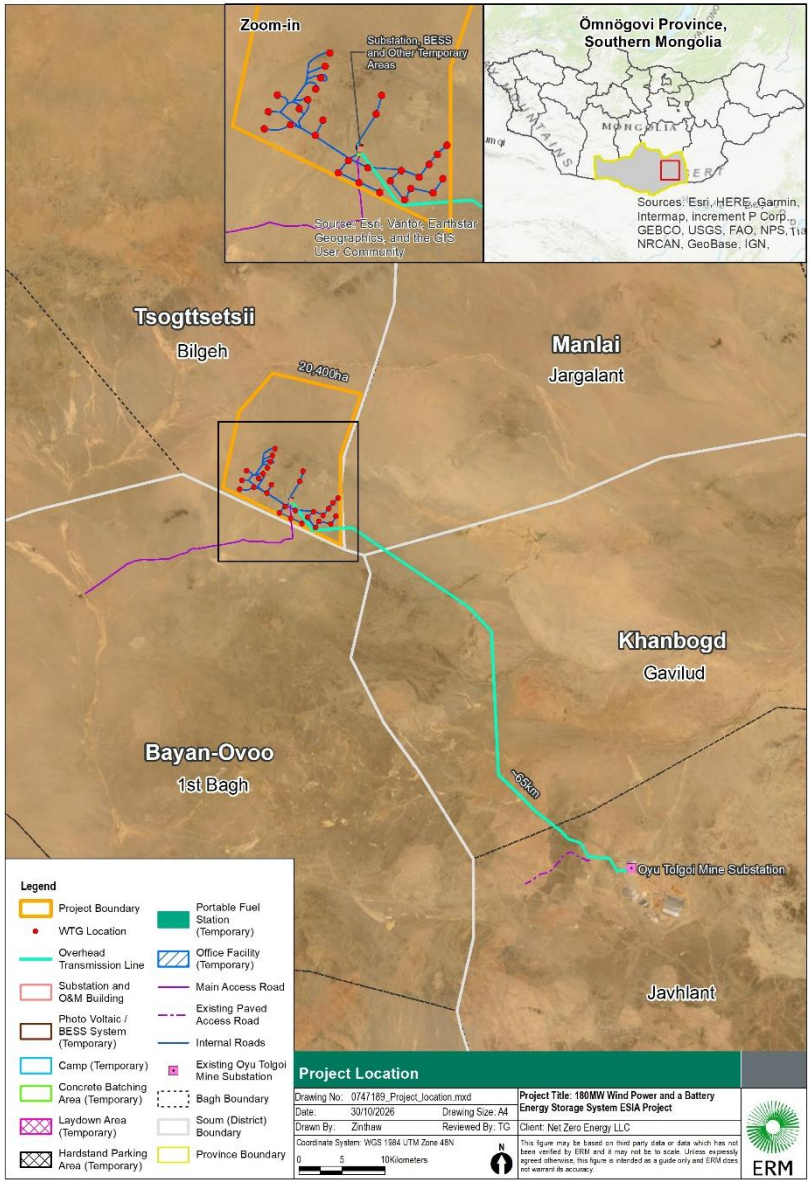
The Project will consist of the following components (refer to ***Chapter 3*** for more details):

- 29 Wind Turbine Generators (WTG);
- Substation consisting of 2x120 MVA power transformers located near the WTG area and the substation will be equipped with a Control Room;
- A Battery Energy Storage System of 50MW and 100 MWh (BESS);
- A ~65 km double-circuit 220 kV Overhead Transmission Line (OHL) connecting in a southeast direction from the Wind Farm Site to the Oyu Tolgoi Mine's central substation (Option 1) or Zes Oyu 220 kV switching station (Option 2);
- A ~30.9 km improved/unpaved road connecting the existing heavy duty coal transport Road to the WTG Area;
- About ~56 km of internal roads within the WTG Area connecting the different facilities;
- An OHL Access Road of total length about 62.2 km which will support construction and operation of OHL;

- Temporary facilities including workers' accommodation camp, offices, laydown (storage and stockpile) areas, concrete batching plant and onsite solar power generation area (Photo Voltaic array and BESS) and turbine installation areas for WTG assembly.

Project components are shown in ***Figure B1-1***. For ease of readability and clarity, a list of definitions used in this report is provided as follows:

- 'Project' is used to refer collectively to the facilities listed above.
- 'WTG Area' refers to the area for which the Project obtained a Land Possession and Land Possession Certificate for the installation of the WTGs.
- 'Project Site' refers to the land area that will be permanently occupied by the Project and its facilities.



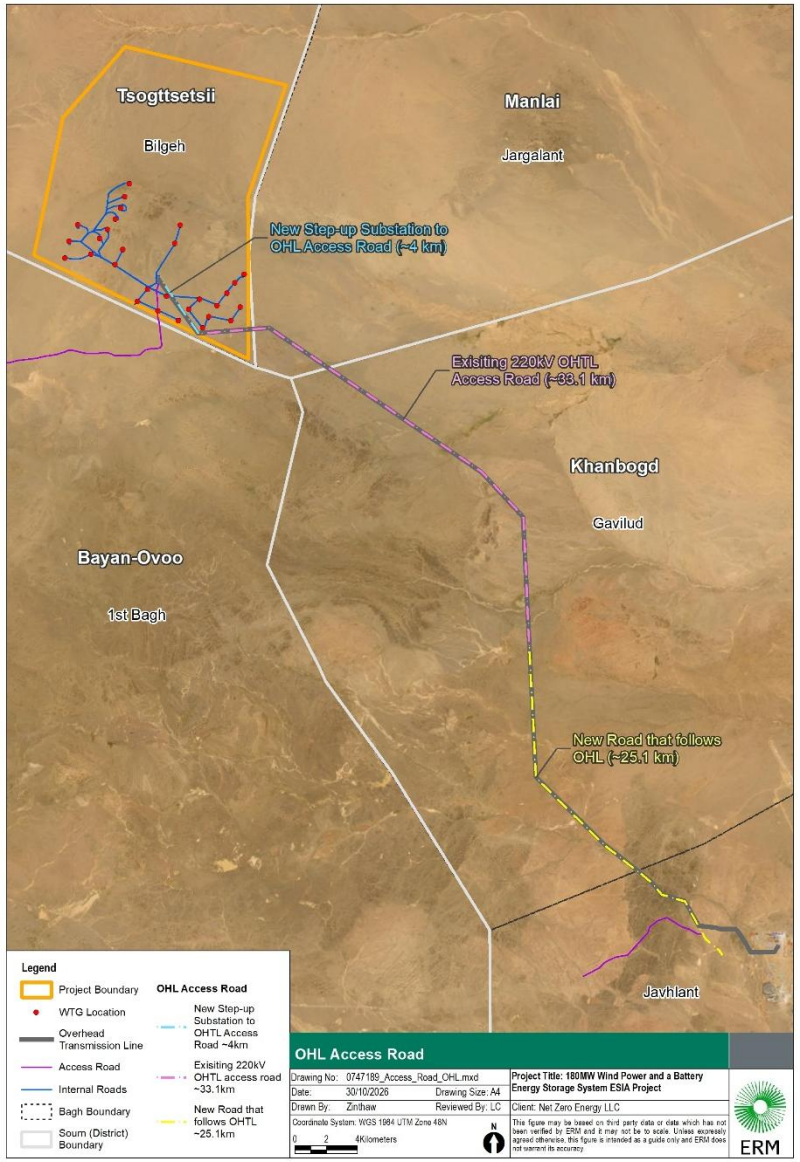


FIGURE B1-1: PROJECT LOCATION

B2. APPROACH AND METHODOLOGY

B2.1 OVERVIEW OF CRITICAL HABITAT ASSESSMENT METHOD

Critical Habitats are areas that include at least one or more of the five high biodiversity value criteria[1] defined in the IFC PS6 and elaborated in the associated IFC PS6 Guidance Note (2019) paragraphs GN69 to 97 (see ***Table B2-1*** for details on the CH criteria). Critical Habitats may not be limited to pristine natural areas, but rather may include modified as well as natural habitats that support high biodiversity that values that meet the defined. i.e. Critical Habitats can be a subset of both modified habitats and natural habitats. It is important to determine whether a project affects Critical Habitat to assist with its planning and the requirements for mitigation. The approach to carrying out this CHA is outlined below.

B2.2 LITERATURE REVIEW AND CRITICAL HABITAT SCREENING

A desktop review of available literature and secondary data was conducted to obtain an initial understanding of the biodiversity values with potential occurrence in the Project AoI. This was carried out using the following key data sources:

- Online databases on protected and internationally recognised areas of biodiversity importance, including the Key Biodiversity Area ("KBA") Partnership, Important Bird and Biodiversity Area ("IBA") Factsheets by BirdLife, Alliance for Zero Extinction Sites, UNESCO World Heritage Site, and Protected Planet by the United Nations Environment Programme World Conservation Monitoring Centre (UNEP-WCMC).
- Online databases on species, including the IUCN Red List of Threatened Species version 2025-2 ("IUCN" or "IUCN Red List"), Global Biodiversity Information Facility ("GBIF"), iNaturalist, BirdLife DataZone, eBird, and Avibase.
- Site-specific Integrated Biodiversity Assessment Tool ("IBAT") report generated for the Project;
- Mongolian Red Book (published in 1987 with latest revision in 2014);
- Mongolian Red Lists part of the Regional Red List Series, including:
  - Mongolian Red List of Mammals (2006),
  - Mongolian Red List of Reptiles and Amphibians (2011),
  - Mongolian Red List of Birds (2011); and
  - Mongolian Red List of Plants (2012).
- Convention on International Trade in Endangered Species of Wild Fauna and Flora[2];
- Convention on the Conservation of Migratory Species of Wild Animals (CMS);
- Publicly available data and scientific literature[3];
- Information made available by the client, including the Project's Detailed Environmental Impact Assessment (DEIA), which was conducted in compliance with Mongolian laws and regulations and included preliminary and limited biodiversity field surveys; and

[1] GN53. IFC Guidance Note (2019) of PS6 (2012).
[2] Convention on International Trade in Endangered Species of Wild Fauna and Flora. Appendices I, II and III valid from 7 February 2025. Available at: https://cites.org/sites/default/files/eng/app/2025/E-Appendices-2025-02-07.pdf
[3] Convention on the Conservation of Migratory Species of Wild Animals (CMS). Appendices I and II effective 17 May 2024. Available at: https://www.cms.int/sites/default/files/uploads/revised-appendices_cop14_e.pdf

- Monitoring reports and data provided from the Oyu Tolgoi (OT) Mine project.

This review informed the initial Critical Habitat Screening exercise conducted as part of the ESIA Scoping Study. The Project-specific IBAT report was used to identify high biodiversity values that may occur within a 50 km radius from the Project site and that could potentially meet the thresholds for CH criteria 1, 2, and 3. In addition, the review of available data (as bulletted above) was used to identify additional ecological sensitivities and develop the checklist of potential species of conservation significance. The Critical Habitat (CH) screening applied a precautionary approach in cases where there was uncertainty about whether a species met the CH criteria thresholds.

Among terrestrial species, there were at least 243 species with possible occurrence in the Project Site and its immediate surroundings. Of these, preliminary results showed the possible occurrence of 110 CH candidate species within a 50 km radius from the Project Site, that are endemic and/or restricted range species, CR and EN species, and/or migratory and congregatory species. These include one (1) CR, five (5) EN, nine (9) VU, ten (10) NT, and three (3) Data Deficient (DD) species. The remaining species are classified as LC but may be endemic and/or congregatory.

With regards to flora species, the results of the IBAT report did not identify any potential CH-qualifying flora species within a 50 km radius from the Project Site. Therefore, review of scientific literature, previous ESIAs and monitoring reports conducted for nearby projects (such as the Oyu Tolgoi mine), and Mongolian Red List assessments of plant species in the East Gobi region of southern Mongolia were reviewed to identify a preliminary list of eight (8) flora species of conservation concern that may be present within the Project AoI.

B2.3 PRIMARY DATA COLLECTION AND VERIFICATION OF AVAILABLE INFORMATION

Six (6) field surveys for terrestrial biodiversity were carried out between August 2024 and May 2025 to verify the initial desktop review and CH screening, collect primary data to establish the existing baseline conditions in the Project AoI, and to inform the Biodiversity Impact Assessment and Critical Habitat Assessment. The surveys conducted during this period include those listed below, while ***Chapter 6 Baseline*** provides further details about the methodologies of each survey conducted.

Dates of surveys conducted:

- Surveys conducted by target taxa:
  - Terrestrial flora and vegetation communities (quadrats, transects, and site walkovers);
  - Birds (vantage point surveys, transects and point-counts, nest search surveys, carcass surveys with 2x3 km transects, targeted transects for Asian Houbara);
  - Large mammals (transects, camera traps, interviews with locals, targeting Asiatic Wild Ass, Goitered Goitered Gazelle, Argali Sheep, and Snow Leopard);
  - Small mammals (transects and live traps);
  - Herpetofauna i.e. reptiles and amphibians (transects and active search); and
  - Bats (passive acoustic monitoring surveys, mist netting, roost search).
- Dates of the six (6) baseline surveys:
  - 24 August – 3 September 2024

- 20 September – 3 October 2024
- 1-14 November 2024
- 3-16 January 2025
- 2-15 April 2025
- 7-20 May 2025

B2.4 CRITICAL HABITAT DETERMINATION

The Critical Habitat Assessment is based on the criteria and thresholds defined by IFC PS6 and EBRD ESR6, as shown in ***Table B2-1*** and ***Table B2-2****,* respectively. IFC PS6 Critical Habitat Criteria 1-3 are based on the criteria and thresholds also used in the IUCN Key Biodiversity Area (KBA) Standard.[4] Quantitative and qualitative thresholds (qualifying requirements) are available for IFC PS6 CH Criteria 1 to 4 and EBRD ESR6 CH Criteria 1-4, IFC PS6 CH Criterion 5 is determined based on qualitative expert judgment. ERM specialists have reviewed and analysed the data collected during the first two steps outlined above to determine whether the Project is situated within any Critical Habitat and, if present, for which specific high biodiversity values.

If any one of the criteria are met for the ecologically appropriate area of analysis (EAAA), it will be considered Critical Habitat irrespective of failing to meet any other criterion, i.e. each criterion is applied separately and not in combination, meaning that the scores are not cumulative. Equally, more than one criterion may be applicable (e.g., an endangered species that is also endemic or range-restricted).

The relevant IFC PS6 and EBRD ESR6 guidance notes provide further guidance through well-defined criteria and thresholds on how to identify CH. Note that, as Mongolia is not a European Union (EU) member state and is not a signatory nation of the Bern Convention, some EBRD ESR6 and EIB ESS4 criteria for CH do not apply to this project, namely those relating to the EU Habitats Directive, the EU Birds Directive and the Bern Convention.

TABLE B2-1: IFC PS6 CRITERIA AND THRESHOLDS FOR CRITICAL HABITAT

Criteria	IFC PS6 Thresholds
Criterion 1: Critically Endangered (CR)/Endangered (EN) species	(a) Areas that support globally important concentrations of an IUCN Red-listed EN or CR species ($\geqslant$ 0.5% of the global population AND $\geqslant$ 5 reproductive units of a CR or EN species). (b) Areas that support globally important concentrations of an IUCN Red-listed Vulnerable (VU) species, the loss of which would result in the change of the IUCN Red List status to EN or CR and meet the thresholds in (a). (c) As appropriate, areas containing important concentrations of a nationally or regionally listed EN or CR species.
Criterion 2: Habitat of significant importance to endemic and/or restricted-range species	(a) Areas that regularly hold $\geqslant$ 10% of the global population size AND $\geqslant$ 10 reproductive units of a species.

[4] IUCN, "A Global Standard for the Identification of Key Biodiversity Areas", 2016. Available at: https://portals.iucn.org/library/node/46259.

Criteria	IFC PS6 Thresholds
Criterion 3: Habitat supporting globally significant concentrations of migratory species and/or congregatory species	(a) Areas known to sustain, on a cyclical or otherwise regular basis, ≥ 1% of the global population of a migratory or congregatory species at any point of the species' lifecycle. (b) Areas that predictably support ≥ 10% of the global population of a species during periods of environmental stress.
Criterion 4: Highly threatened and/or unique ecosystems	(a) Areas representing ≥ 5% of the global extent of an ecosystem type meeting the criteria for IUCN status of CR or EN. (b) Other areas not yet assessed by IUCN but determined to be of high priority for conservation by regional or national systematic conservation planning.
Criterion 5: Areas associated with key evolutionary processes	No set quantitative thresholds and determined on a case-by-case basis. Examples of spatial features associated with evolutionary processes include landscapes with high spatial *heterogeneity* are a driving force in speciation; *Connectivity* between habitats (for example, biological corridors) ensures species migration and gene flow, which is especially important in fragmented habitats and for the conservation of metapopulations.

Notes:

Endemic/Restricted-range Species = Defined as: (i) terrestrial vertebrates and plants with an Extent of Occurrence (EOO) of less than 50,000 km2; (ii) marine species with an EOO of less than 100,000 km2; and (iii) coastal, riverine, and other aquatic species in habitats that do not exceed 200 km width at any point (for example, rivers) and with a global range of less than or equal to 500 km linear geographic span (i.e., the distance between occupied locations furthest apart).

Migratory species = Any species of which a significant proportion of its members cyclically and predictably move from one geographical area to another (including within the same ecosystem).

Congregatory Species = Species whose individuals gather in large groups on a cyclical or otherwise regular and/or predictable basis.

Reproductive Unit = The minimum number and combination of mature individuals necessary to meet the thresholds for a successful reproductive event at a site Examples of five reproductive units include five pairs, five reproducing females in one harem, and five reproductive individuals of a plant species.

Source: IFC Guidance Note 6, updated 27 June 2019.

TABLE B2-2: EBRD ESR6 CRITERIA AND THRESHOLDS FOR CRITICAL HABITAT

Criterion	Critical Habitat
Priority Ecosystems	
1. Threatened ecosystems/habitats a. Habitats listed in Annex 1 of EU Habitats Directive (EU members only) or Resolution 4 of Bern Convention (signatory nations only)* b. IUCN Red List EN or CR ecosystems c. Ecosystem/habitats listed in national systematic conservation planning	ESR 6 paragraph 14 (i) a. Habitat type listed in Annex 1 of EU Habitats Directive marked as "priority habitat type" b. EAAA ≥5% of global extent of an ecosystem type with IUCN status of CR or EN c. EAAA for ecosystem/habitat determined to be of high priority for conservation by national systemic conservation planning
Priority species and their habitats	

Criterion	Critical Habitat
2. Threatened species a. Species and their habitats listed in EU Habitats Directive and Birds Directive (EU members only) or Bern Convention (signatory nations only)* b. IUCN global Red List VU, EN or CR species c. IUCN national or regional (for example, Europe) Red List EN or CR species (or analogous national listing)	ESR 6 paragraph 14 (ii) a. EAAA supports species listed in Annex II of Habitats Directive marked as "priority species" b. EAAA supports ≥0.5% of the global population AND ≥5 reproductive units of a CR or EN species, or EAAA supports globally significant population of VU species necessary to prevent a change of IUCN Red List status to EN or CR. c. EAAA for important concentrations of species with national or regional status of EN or CR.
3. Range-restricted species a. All range-restricted species	ESR 6 paragraph 14 (iii) a. EAAA regularly holds ≥10% of global population AND ≥10 reproductive units of the species
4. Migratory and congregatory species b. All migratory species c. All congregatory species	ESR 6 paragraph 14 (iv) a. EAAA sustains, on a cyclical or otherwise regular basis, ≥1% of the global population at any point of the species' lifecycle. b. EAAA predictably supports ≥10% of global population during periods of environmental stress
*Note: Mongolia is not an EU member nor a signatory of the Bern Convention.	

B2.5 PRIORITY BIODIVERSITY FEATURES DETERMINATION

In addition to CH values, EBRD ESR6 requires consideration of PBFs, which are a subset of biodiversity that are irreplaceable or vulnerable, but at a lower priority level than critical habitats. PBFs include:

- Threatened habitats;
- Vulnerable species;
- Significant biodiversity features identified by a broad set of stakeholders or governments; and
- Ecological structure and functions needed to maintain the viability of the aforementioned priority biodiversity features.

Though PBFs are considered less sensitive (and warranting less stringent mitigation and management actions) than critical habitats, they still require assessment as part of the ESIA process. The criteria and thresholds for determination of PBFs are defined in the EBRD ESR6 Guidance Note (2025) and presented in ***Table B2-3***.

TABLE B2-3: EBRD ESR6 CRITERIA AND THRESHOLDS FOR PRIORITY BIODIVERSITY FEATURES

Criterion	Priority Biodiversity Feature
Priority Ecosystems	
1. Threatened ecosystems/habitats d. Habitats listed in Annex 1 of EU Habitats Directive (EU members only) or	ESR 6 paragraph 12 (i)

Criterion	Priority Biodiversity Feature
Resolution 4 of Bern Convention (signatory nations only)* e. IUCN Red List EN or CR ecosystems f. Ecosystem/habitats listed in national systematic conservation planning	a. Habitat type listed in Annex 1 of EU Habitats Directive or Resolution 4 of Bern Convention b. Ecosystem type with IUCN status of EN or CR
Priority Species and their Habitats	
2. Threatened species d. Species and their habitats listed in EU Habitats Directive and Birds Directive (EU members only) or Bern Convention (signatory nations only)* e. IUCN global Red List VU, EN or CR species f. IUCN national or regional (for example, Europe) Red List EN or CR species (or analogous national listing)	ESR 6 paragraph 12 (ii) a. Species in the area of impact listed in Annex II of Habitats Directive, Annex I of Birds Directive or Resolution 6 of Bern Convention b. Species in the area of impact** with IUCN global Red List status of VU, EN or CR c. Species in the area of impact with national or regional status of EN or CR
3. Range-restricted species d. All range-restricted species	ESR 6 paragraph 12 (ii) 1 All range-restricted species in the area of impact**
4. Migratory and congregatory species e. All migratory species f. All congregatory species	ESR 6 paragraph 12 (ii) c. All migratory species in the area of impact**
*Mongolia is not an EU member nor a signatory of the Bern Convention. **Area of impact is defined in footnote 39 of the EBRD ESR6 Guidance Note (2025) as "the total area likely to be affected by the onsite and offsite impacts of a project's activities. This includes direct, indirect (induced) and cumulative effects."	

B2.6 CLARIFICATION ON IFC PS6 CRITERION 1(C) AND EBRD ESR6 CRITERION 2(C)

IFC PS6 CH Criterion 1(c) and EBRD ESR6 CH Criterion 2(c) require consideration of regionally or nationally listed CR and EN species. IFC PS6 footnote 11 states:

- "The determination of critical habitat based on other listings is as follows: (i) If the species is listed nationally / regionally as critically endangered or endangered, in countries that have adhered to IUCN guidance, the critical habitat determination will be made on a project by project basis in consultation with competent professionals; and (ii) in instances where nationally or regionally listed species' categorizations do not correspond well to those of the IUCN (e.g., some countries more generally list species as "protected" or "restricted"), an assessment will be conducted to determine the rationale and purpose of the listing. In this case, the critical habitat determination will be based on such an assessment."

No additional information is provided in the EBRD ESR6 Guidance Note on the interpretation of "analogous national listing", however it is clear that an "IUCN national or regional Red List EN or CR species" refers to any country- or region-specific Red Lists developed in line with the global IUCN Red List criteria and guidelines.

For all species discussed, their global conservation status is determined based on the IUCN Red List, while their regional conservation status is based on the Mongolian Red List. Both of these use the nine-category classification system as illustrated in *Figure B2-1*.The Mongolian Red List categorization is considered to adhere to IUCN guidance,

therefore species listed as Critically Endangered (CR) and Endangered (EN) on the Mongolian Red List are considered to be applicable for CH Criterion 1(c) regarding "areas containing important concentrations of a nationally or regionally listed EN or CR species".

With regards to national species' categorizations established under Mongolian legislation, the Mongolian government provides the legal basis for the protection of flora and fauna under the following:

- Law on Flora of 1995 and its associated List of Rare Plants (Appendix to Mongolian Government Resolution No. 153)
- Law on Fauna of 2000 and its 2001 revision (Mongolian Government Resolution No. 264); and
- Mongolian Red Book of 1987 and revised in 1997 and 2011 by the Mongolian Ministry of Environment and Climate Change.

These laws and their associated resolutions categorize flora and fauna into 'Very Rare' and 'Rare' species, the definitions for which are described below.

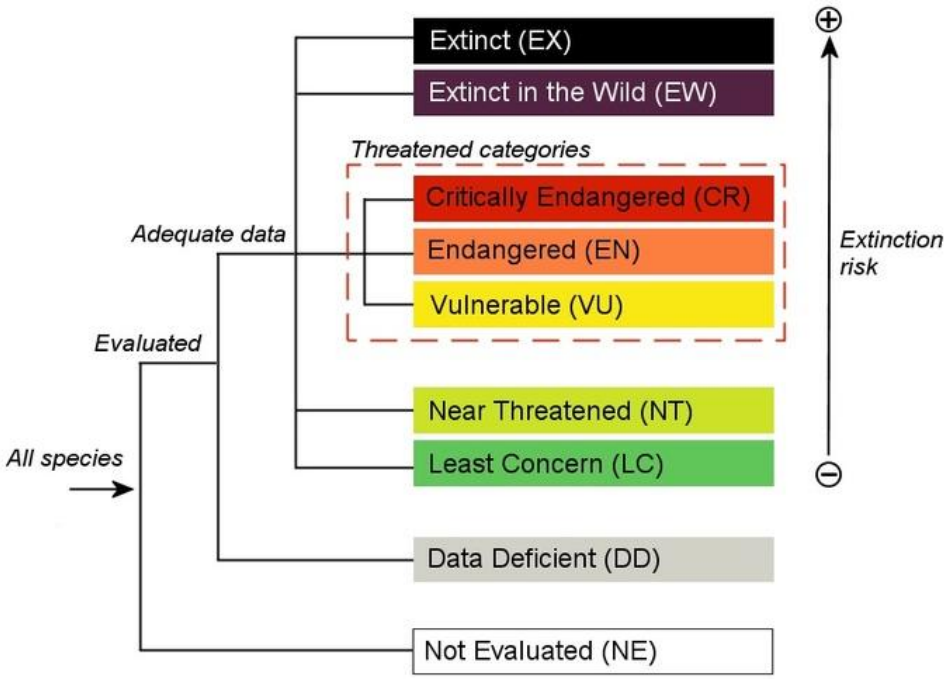
- Very Rare (Law on Fauna) – "Wildlife species that have a restricted capacity to recover, a limited distribution, no usable reserves and are in danger of extinction."[5]
- Very Rare (Law on Natural Flora) – "Plant species with no natural regeneration capacity, very restricted distribution and no usable reserves, and that are in danger of extinction (this classification applies to the plants listed in the Appendix to this Law).[6]
- Rare (Law on Fauna) – "Fauna which have a limited capacity to recover, limited distribution, have a small population and are potentially in danger of extinction."
- Rare (Law on Natural Flora) – "Plant species with limited natural regeneration capacities and limited distribution and reserves, and that potentially are at risk of extinction."

Designation of legal protection to species under this regulatory framework only extends legal protection to species listed as 'Very Rare' or 'Rare', such that any non-listed species are therefore not protected.

Overall, the Mongolian regulatory framework for species' legal protection as described above does not align with the more robust nine-category classification system used by the IUCN to evaluate conservation status, nor does it correspond with the guidelines for applying the IUCN Red List criteria at national or regional levels.[7] Therefore, species that are classified as Very Rare or Rare are not applicable for IFC PS6 CH Criterion 1(c) nor EBRD ESR6 Criterion 2(c) and its associated PBF and CH thresholds, unless these species are also listed as EN or CR on the Mongolian Red List.

For example, 12 out of 13 flora species of conservation concern recorded during the baseline surveys are designated as Rare or Very Rare. However, 11 of these Rare/Very Rare species are not evaluated on the IUCN Red List and also not listed as CR or EN on the Mongolian Red List of Plants (with conservation statuses ranging from NE to LC, NT and VU); therefore, these 11 species have been screened out as PBFs and CH values under EBRD ESR6 as well as CH values under IFC PS6.

[5] Mongolian Law on Fauna, 2000. Ulaanbaatar. https://faolex.fao.org/docs/pdf/mon77263E.pdf
[6] Mongolian Law on Natural Flora, 1995. Ulaanbaatar. https://faolex.fao.org/docs/pdf/mon77264E.pdf
[7] IUCN, 2012. Guidelines for application of IUCN Red List criteria at regional and national levels: Version 4.0. Available at https://portals.iucn.org/library/node/10336



Source: IUCN

FIGURE B2-1: NINE-CATEGORY CONSERVATION CLASSIFICATION SYSTEM

B2.7 EXPERT CONSULTATIONS

Subject Matter Experts (SMEs) with local biodiversity knowledge were consulted to support the assessment of Critical Habitat-qualifying values, focusing on those preliminarily identified as CH values, the results of which have been integrated into the CHA. Information on these experts are provided in the table below.

TABLE B2-4: BIODIVERSITY EXPERTS CONSULTED

No.	Name	Specialism	Position and Experience	Date
1	Dr. Magsar Urgamal	Flora	Dr. Magsar Urgamal is an expert on Mongolian flora and Head of Laboratory of the Plant Systematics and Phylogenetics Department of the Botanic Garden and Research Institute (Mongolian Academy of Sciences). He has published research articles and checklists of native and endemic flora, covering all of Mongolia including the southern and eastern Gobi regions. He was consulted on the plant species *Amygdalus mongolica*.	28 April 2026
2	Dr. Buuveibaatar Bayarbaatar	Ungulates	Dr. Buuveibaatar Bayarbaatar is a Senior Conservation Scientist at the Wildlife Conservation Society's (WCS) Mongolia Program, specializing in population dynamics, movement ecology, behaviour, habitat use of endangered nomadic ungulates, and the	29 April 2026

No.	Name	Specialism	Position and Experience	Date
			effects of anthropogenic degradation and fragmentation of ungulate habitats in Mongolia. He has published numerous research articles on species including the Asiatic Wild Ass (*Equus hemionus*), Goitered Gazelle (*Gazella subgutturosa*), Saiga Antelope (*Saiga tatarica*), and Mongolian Gazelle (*Procapra gutturosa*). He was consulted on the Asiatic Wild Ass.	
3	Gombobaatar Sundev	Avifauna	Gombobaatar Sundev is a Professor at the National University of Mongolia in Ulanbaatar, President of the Mongolian Ornithological Society, and co-author of the Mongolian Red List of Birds (2011), Princeton Field Guide to the Birds of Mongolia (2019), and numerous research articles on Mongolian avifauna. He was consulted on two (2) species – the Great Bustard (*Otis tarda*) and the Houbara Bustard (*Chlamydotis macqueenii*).	29 April 2026

B3. BIODIVERSITY VALUES SUMMARY

This section summarizes information from the biodiversity baseline assessment presented in ***Chapter 6: Environmental & Social Baseline***, including review of secondary data and primary data collected from field surveys undertaken for the Project. This information, in conjunction with further investigation of CH candidates, is used to evaluate biodiversity values taken forward in this Critical Habitat Assessment.

B3.1 ECOREGION DESCRIPTION

The Project is situated within the Eastern Gobi Desert Steppe ecoregion and to the west and north of the Alashan Plateau Semi-Desert (see ***Figure B3-1***).[8] There are no clear distinctions that differentiate these two ecoregions, but rather delineates the approximate boundaries between the more steppe-like grassland ecosystems to the north and more arid, desert-like ecosystems to the south.

The region is characterised by very cold winters and very limited precipitation, which falls geographically unpredictably. Resident large herbivores with nomadic migratory patterns are characteristic of this ecosystem, including the Asiatic Wild Ass (*Equus hemionus*) and the Goitered Gazelle (*Gazella subgutturosa*), which make very extensive semi-migratory movements throughout the year in response to change in pasture quality, weather conditions, and water availability.

The South Gobi is not noted for its endemism, as the distributions of most species known from this region extend far through arid areas to the west (particularly to western Mongolia and northwest China). The main global biodiversity value of the South Gobi region lies in its relative lack of anthropogenic disturbance to date. Traditional extensive nomadic pastoralism has had only a limited impact on natural ecosystems due to relatively limited permanent settlements and a relatively small human population, though impacts from livestock overgrazing and large-scale developments in the region have increased in the past decades. Nevertheless, the historically low level of disturbance has helped to maintain the large ungulate assemblage mentioned above, which has disappeared across most of its former range outside of Mongolia.

Vegetation in this ecoregion is considered homogenous across large areas and consists of drought-adapted shrubs and thinly distributed low grasses. Species characteristics of this ecoregion include the Asiatic Wild Ass (*Equus hemionus*), Goitered Gazelle (*Gazella subgutturosa*), Mongolian Gazelle (*Procapra gutturosa*), Asian Houbara Bustard (*Chlamydotis undulata*), Cinereous Vulture (*Aegypius monachus*), Saker Falcon (*Falco cherrug*), Pallas's Sandgrouse (*Syrrhaptes paradoxus*), Mongolian Ground Jay (*Podoces hendersoni*), as well as other birds and jerboa species.

[8] WWF Terrestrial Ecoregions, based on Olson, D. *et al*. 2001. Terrestrial ecoregions of the world: a new map of life on Earth. Bioscience 51(11):933-938. https://doi.org/10.1641/0006-3568(2001)051[0933:TEOTWA]2.0.CO;2

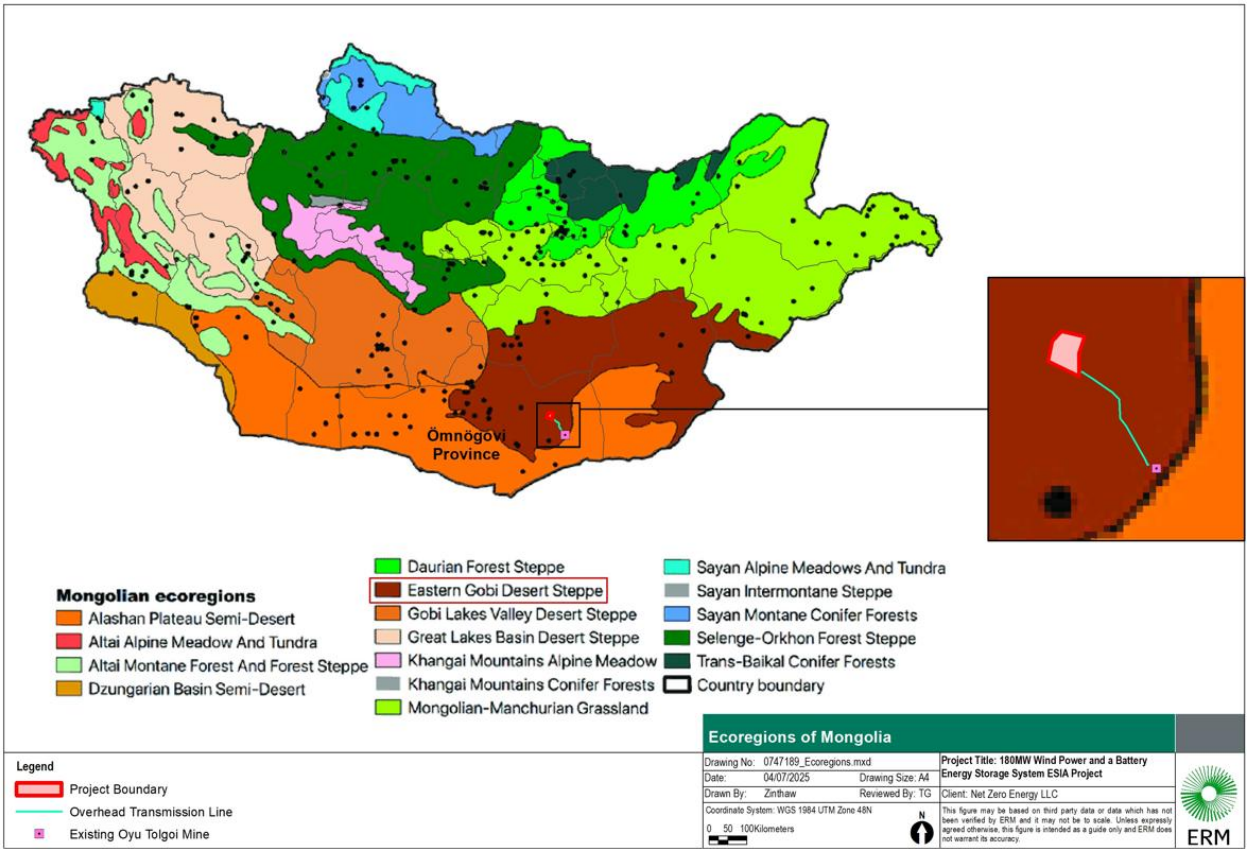


FIGURE B3-1: ECOREGIONS IN MONGOLIA

B3.2 LEGALLY PROTECTED AND INTERNATIONALLY RECOGNISED BIODIVERSITY AREAS

A total of five (5) biodiversity areas of significance have been identified within 50 km of the Project, including three (3) Locally Protected Areas, one (1) Strictly Protected Area, and one (1) KBA/IBA. ***Figure B3-2*** maps these five areas with respect to the Project boundaries and ***Table B3-1*** summarises key information about these areas. Definitions of Locally Protected Areas, Strictly Protected Areas, KBAs, and IBAs, as well as details on each area listed below, are provided in subsequent sections.

TABLE B3-1: LIST OF PROTECTED AND INTERNATIONALLY RECOGNISED AREAS WITHIN 50 KM FROM THE PROJECT SITE

No.	Biodiversity Area	Type	Closest Linear Distance from Project Site (km)
1	Gurvan gavluud, Har deliin tolgod	Locally Protected Area	Overlaps with the Project's TL
2	Ih baga luus	Locally Protected Area	Overlaps with the Project's Access Road
3	Tulugtiin tal	Locally Protected Area	1.6 km
4	Galba Gobi	KBA and IBA	26.4 km
5	Small Gobi A Strictly Protected Area	Strictly Protected Area	36.3 km from southern end of OHL, 75-85 km from WTG area

Galba Gobi[9]

The Galba Gobi KBA and IBA has a total area of 828,328 ha and is characterized by a 100 km-long desert valley, with rolling hills, sand dunes and dry riverbeds with elm and saxaul trees. Some rocky hills and oases are found in the area. Poaching of the Near Threatened (NT) Asiatic Wild Ass (*Equus hemionus*) and other wildlife species has increased in recent years. Pastures utilized by the Asiatic Wild Ass populations in southern Mongolia also overlap with grazing areas for livestock, resulting in competition for food and water. The site is bisected by an existing road linking mines in Omnogobi aimag with the Chinese border. The area was listed as an IBA as it hosts globally threatened species and supports biome-restricted assemblages, with IBA qualifying species including the Vulnerable (VU) Asian Houbara (*Chlamydotis macqueenii*), Least Concern (LC) Mongolian Ground Jay (*Podoces hendersoni*), LC Pallas's Sandgrouse (*Syrrhaptes paradoxus*), and LC Saxaul Sparrow (*Passer ammodendri*).[10] Other species of conservation concern found in the Galba Gobi include globally threatened and migratory birds such as the Endangered (EN, IUCN) Saker Falcon (*Falco cherrug*), Near Threatened (NT) Cinereous Vulture (*Aegypius monachus*), LC Short-toed Snake Eagle (*Circaetus gallicus*), LC Booted Eagle (*Hieraaetus pennatus*), and LC Amur Falcon (*Falco amurensis*), which also breed at the site. Non-bird species that occur in the Galba Gobi include the EN Asiatic Wild Ass (*Equus hemionus*), VU Goitered Gazelle (*Gazella subgutturosa*), NT Argali (*Ovis ammon*), NT Siberian Ibex (*Capra sibirica*), and LC Long-eared Jerboa (*Euchoreutes naso*).[11]

Small Gobi A Strictly Protected Area (SPA)

Located in southeastern Mongolia in part of the Gobi Desert, the Small Gobi SPA (also known as the "Gobiin Baga") was established in 1975 and remained in the category of an SPA under the Law on Special Protected Areas (1994). It was designated as a SPA preserve the distinctive natural habitats of the southeastern Gobi of Mongolia, which had relatively low levels of disturbance from grazing and hunting at the time of designation. It is also categorized as an IUCN Category Ib Protected Area. The total SPA spans an area of approximately 18,304 km^2 and is composed of two separate units—Small Gobi "A" covering 11,478 km^2, and Small Gobi "B" covering 6,826 km^2.[12] Of the two areas, only Small Gobi A is located within a 50 km radius from the Project.

The Small Gobi SPA is characterized by an arid landscape of desert steppe, semi-desert, flat and rolling terrain, grasslands, sand dunes, dry riverbeds, and rocky outcrops that plays a crucial role in transboundary wildlife conservation, particularly for wide-ranging and migratory ungulates like the Asiatic Wild Ass (*Equus hemionus*), Goitered Gazelle (*Gazella subgutturosa)*, Siberian Ibex (*Capra sibirica*) and Argali (*Ovis ammon*). Other species of conservation

9 BirdLife International (2025). Site factsheet: Galba Gobi. Available at: https://datazone.birdlife.org/site/factsheet/galba-gobi
10 Ibid.
11 Key Biodiversity Areas Partnership (2025) Key Biodiversity Areas factsheet: Galba Gobi. Extracted from the World Database of Key Biodiversity Areas. Available at: https://www.keybiodiversityareas.org/site/factsheet/28296/assessment
12 UNEP-WCMC (2025). Protected Area Profile for Gobiin baga /A/ from the World Database on Protected Areas, November 2025. Available at: https://www.protectedplanet.net/124309

importance that have been recorded in the SPA (with rarity) include the Eurasian Lynx (*Lynx lynx*) and Snow Leopard (*Panthera uncia*).[13]

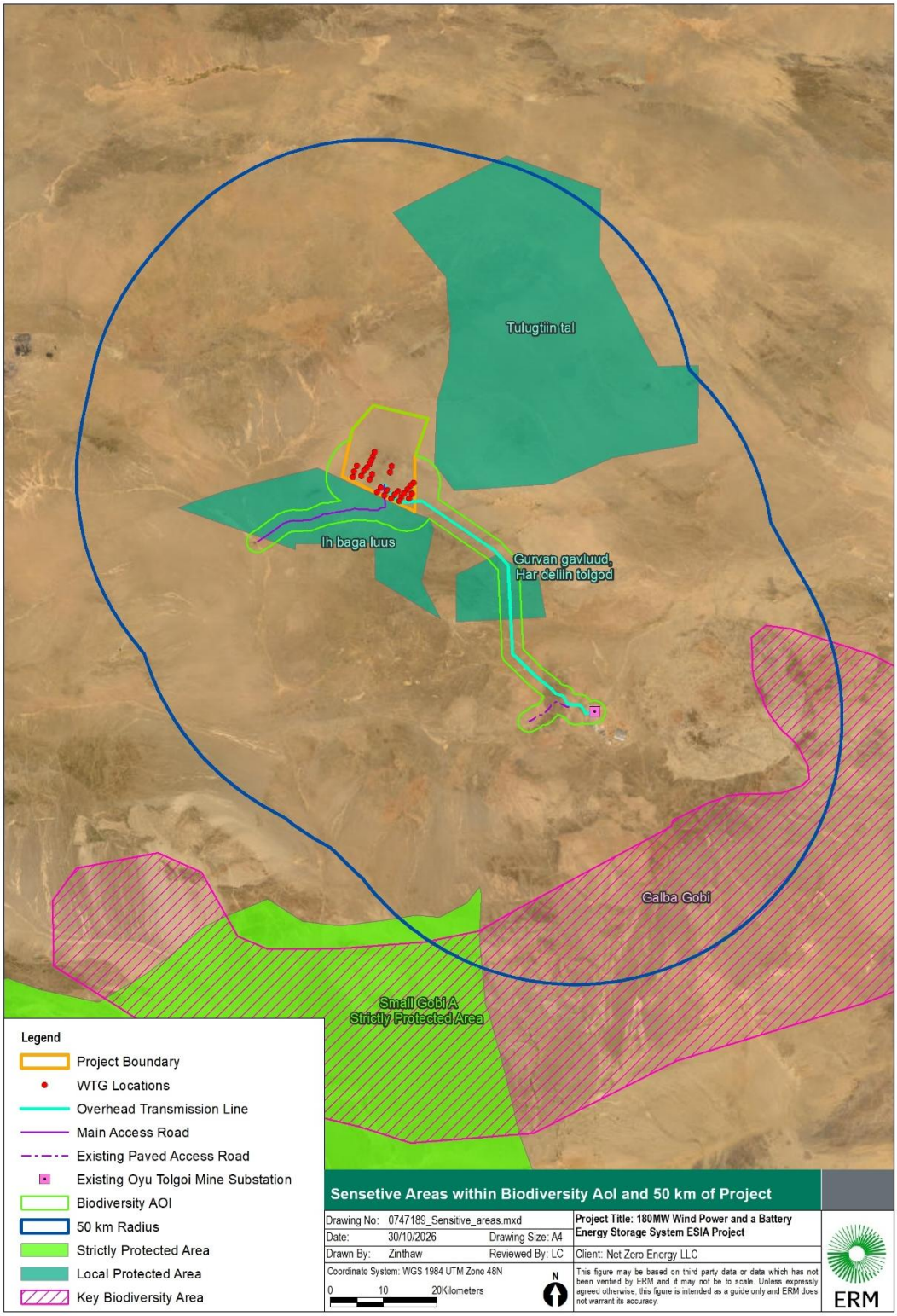


FIGURE B3-2: SENSITIVE BIODIVERSITY AREAS WITHIN 50 KM OF THE PROJECT SITE

13 Augugliaro, C., Paniccia, C., Janchivlamdan, C., Monti, I. E>, Boldbaatar, T., and Munkhtsog, B. 2019. Mammal inventory in the Mongolian Gobi, with the southeasternmost documented record of the Snow Leopard, Panthera uncia (Schreber, 1775), in the country. Check List 15(4): 565-578. https://doi.org/10.15560/15.4.565

Migratory Flyways

The Project area is located at the convergence of three (3) global flyways for migratory birds, namely the East Asian-Australasian Flyway, Central Asian Flyway and West Asian-East African Flyway, as depicted in the figure below. Although flyways have very loosely defined boundaries, it likely the Project falls within the EAAF and possibly the CAF. Migration seasons will differ between bird species, but for the Project it is generally considered that spring migration occurs around mid-March to early June, while autumn migration occurs from around August to early October, peaking in mid-September. Breeding seasons also vary according to particular species.

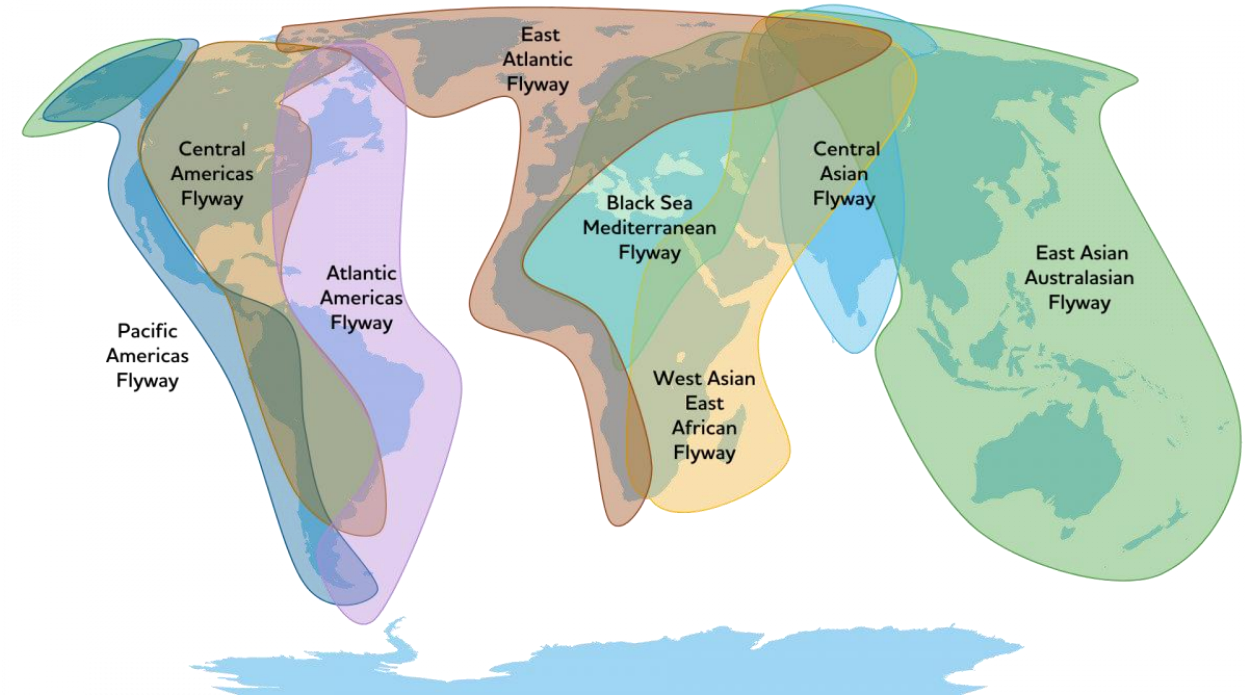


FIGURE B3-3: MIGRATORY FLYWAYS

B3.2.1NATURAL VS. MODIFIED HABITAT

The Project is situated within a dry, desert steppe environment where no standing or flowing surface water bodies or features have been identified within the AoI. Initial habitat analysis referred to available secondary data, satellite imagery, and observations from the scoping site visit conducted by ERM in September 2024, which was then refined through ground-truthing during the six baseline surveys.

Overall, the Project landscape is primarily characterized by flat and slightly undulating desert steppe, hills and hillocks, mountains and valleys, and dry natural drainage channels and riverbeds. Flora primarily consist of cold temperature- and drought-adapted low grasses and shrubs growing on sandy, gravelly/rubble soils that are widely distributed across the open plains. These vegetation patches are important for sustaining local biodiversity by providing shaded area (resting areas for mammals) and nesting microhabitats for avian species. Trees and other larger plant species are very limited in the Project area.

Habitats within the AoI have been delineated based on natural landscape and topographical features, vegetation communities, and degree of anthropogenic pressure present. As shown in

Figure B3-4 and ***Table B3-2*** below, the Project area is predominantly composed of natural habitats with minimal modified habitats. Human disturbances from activities such as herding, grazing by cattle species, and nomadic movements are present throughout the area, but they are not considered substantial enough to significantly alter or degrade these habitats, such that the entire area can be categorized as modified habitat. Subsequent sections provide more information on the natural and modified habitats present in the AoI.

TABLE B3-2: NATURAL AND MODIFIED HABITATS WITHIN THE BIODIVERSITY AOI

Habitat	Area (ha)	Percentage of Total Area
Natural	64,242	>99% (~99.63%)
Modified	240	<1% ~(0.37%)
Total	**64,482**	**100%**

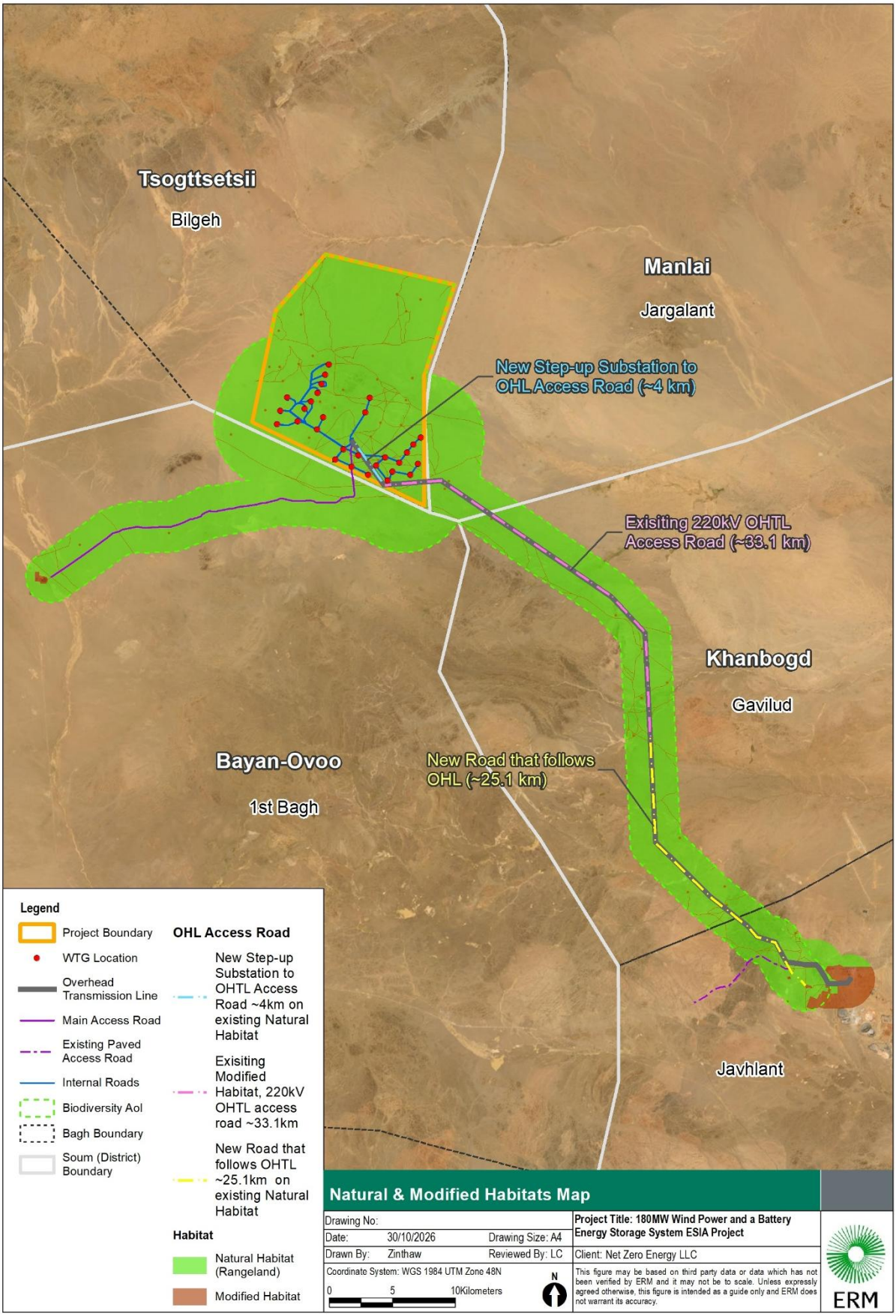


FIGURE B3-4: NATURAL AND MODIFIED HABITATS WITHIN THE BIODIVERSITY AOI

B4. ECOLOGICALLY APPROPRIATE AREA OF ANALYSIS

A review of the region's ecology was carried out as part of ***Chapter 6*** and summarized in ***Section B2.5*** to inform the delineation of the Project's Ecologically Appropriate Area of Analysis (EAAA), so as to determine the presence of species or ecosystems present in the Project's AoI that may qualify as critical habitat.

Delineating an EAAA requires considerations of: (i) the likely geographic area or extent of anticipated project activities and impacts; (ii) the full extent of ecosystems that might be affected in any way; and (iii) any additional areas that have a functional role in supporting those ecosystems or their associated biodiversity. As specified in the IFC PS Guidance Note, the spatial scope should be ecologically determined and defined, accounting for the distribution of species or ecosystems and the ecological patterns, processes, features, and functions that are necessary for maintaining them, such as catchments, large rivers, or geological features (IFC PS6 GN59). EAAAs typically extend well beyond a Project's physical footprint and are usually anticipated to be greater than the AoI, while considering individual species' ecology. It is nevertheless permissible to have an EAAA that captures several species or to have a series of EAAAs depending on ecosystem or ecological factors.

The Project area is primarily characterized by an arid desert steppe and semi-desert ecosystem with flat and rolling terrain, as well as hills and hillocks, valleys and dry riverbeds distributed across vast open desert steppe and semi-desert habitats. A central feature of this landscape is the absence of distinct topographical, hydrological, or geological features that may act as natural barriers to wildlife movement, boundaries between wildlife corridors, or bottleneck sites through which migrating species may be "funnelled" during passage. The presence of flora and fauna species characteristic of Eurasian desert steppe environments (such as drought and cold-tolerant low grasses and shrubs, desert-adapted small mammals, etc.), which also share mostly similar ecological and habitat preferences with one another, are indicative of the relative homogeneity of the area's landscapes and habitats. Therefore, due to the lack of highly distinct natural boundaries or differences in species' ecological requirements, the approach employed for EAAA determination has focused on the Project's Area of Influence and habitat contiguity.

Moreover, for wind farm developments, identifying the AoI and EAAA can be particularly challenging as the primary impacts arise from mortality or displacement of mainly volant species (e.g. birds) that interact with the collision risk zone, created by the rotation of the turbine blades. This may be further complicated by the presence of long-range migratory species, as encompassing the full geographic range of such species would result in extremely large population extrapolations when assessing against the CH criteria quantitative thresholds. Therefore, for some wide-ranging species like migratory birds and ungulates, important areas of aggregation, recruitment, species' home ranges, and other habitat features were also considered where data was available, per IFC PS6 GN59.

Overall, two EAAAs have been delineated for the Project as presented below and mapped in ***Figure B4-1***.

- EAAA for mobile and wide-ranging species (e.g. volant fauna and migratory ungulates) is defined as a 20 km buffer from each WTG and a 10 km buffer from the centreline of the OHL and main access road. The total size of this EAAA is 3,021 km^2 (or 302,076 ha).

- EAAA for other flora and fauna species is defined as a 10 km buffer around each WTG and a 5 km buffer from the centreline of the OHL and main access road. The total size of this EAAA is 1,350 km^2 (or 134,969 ha).

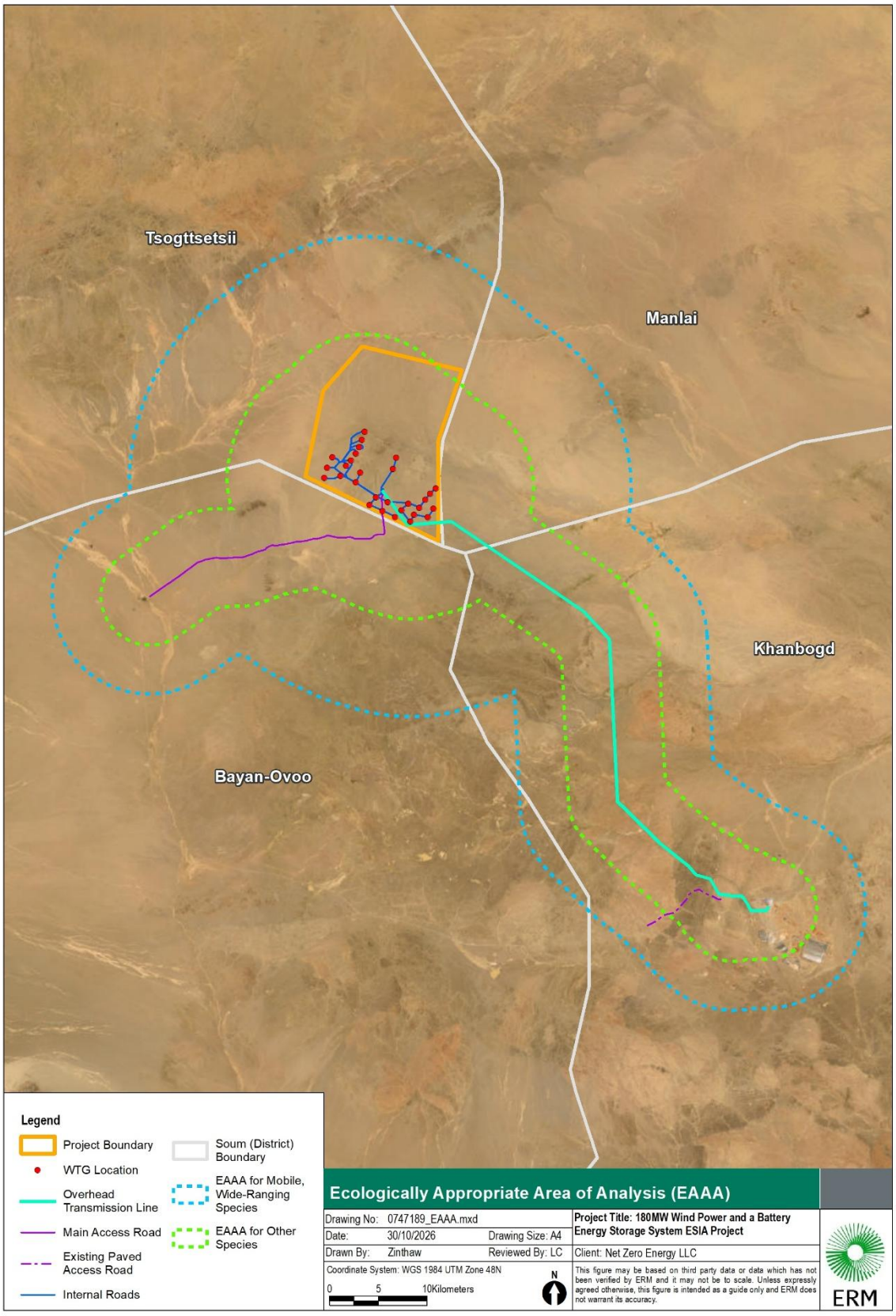


FIGURE B4-1: ECOLOGICALLY APPROPRIATE AREA OF ANALYSIS FOR THE PROJECT

B5. FINDINGS OF THE CRITICAL HABITAT ASSESSMENT

In total, 21 birds, 6 mammals, and 1 plant species were CH candidates for taking forward in this full Critical Habitat Assessment. This CHA, which forms part of the ESIA Report, provides further analysis of these 28 species based on desktop research, primary data collected during the August 2024 – May 2025 baseline surveys, and expert consultations, as set out in the following sections.

B5.1 PS6 CRITERIA 1-3 AND ESR6 CRITERIA 2-4

Initially, species' potential occurrence (or likelihood of occurrence) was assessed at a desktop level based on available information and the Critical Habitat Screening conducted for the Project and supplemented by the findings of the biodiversity baseline assessment (refer to ***Chapter 6 Baseline***). The desk-based Critical Habitat Screening applied a precautionary approach where there was uncertainty regarding whether a species meets CH Criteria 1-3, and as stated previously, 118 species were considered as CH candidates. Species recorded during the baseline surveys were subsequently cross-referenced with the CH screening to further develop the checklist of CH candidate species.

The ecological requirements and habitat preferences of each CH candidate were further examined based on available literature and was then compared against the known species distribution and habitat types documented in the Project area and EAAA in order to estimate the potential occurrence of each priority species identified, using the matrix shown in ***Table B5-1***. Additional species were screened out through this process, including those with geographic ranges that do not overlap with the EAAA, species with suitable and/or preferred habitats that are not present in the EAAA, species that have been locally extirpated and are no longer found in the area, and species whose conservation status may have changed as part of the IUCN Red List's version 2025-2 update. After the screening process, a total of 28 remaining candidates were assessed as part of this CHA.

TABLE B5-1: GENERIC MATRIX USED TO ESTIMATE SPECIES' POTENTIAL OCCURRNECE BASED ON DOCUMENTED HABITAT PRESENCES AND KNOWN DISTRIBUTION

		Species Habitat Requirements / Preferences		
		Fully met	**Largely met**	**Not met / Unsuitable**
Species' Distribution	Habitat occurs within documented species' geographical and/or altitudinal range	Highly likely	Likely	Unlikely
	Habitat occurs on the edge of documented species' geographical and/or altitudinal range	Possible	Possible	Unlikely
	Habitat occurs outside of documented species' geographical and/or altitudinal range	Unlikely	Unlikely	Highly unlikely / Improbably

Of all 28 CH candidates assessed, **no species met the thresholds for critical habitat under PS6 CH Criteria 1-3 and ESR6 CH Criteria 2-4**. Full assessments for CH candidates that do not meet the thresholds for any of the five CH criteria are presented in ***Appendix A.***

B5.2 PS6 CRITERION 4 AND ESR6 CRITERION 1: THREATENED AND/OR UNIQUE ECOSYSTEMS

Highly threatened or unique ecosystems are defined by a combination of factors such as long-term trends, rarity, ecological condition, and major threats. IFC PS6 describes the thresholds of Criterion 4 to include the following:

- The ecosystem is at risk of significantly decreasing in area or quality;
- Has a small spatial extent; and/or
- Contains unique assemblages of species including assemblages or concentrations of biome-restricted species.

The habitats within the EAAA have not been subject to an assessment by the IUCN in accordance with PS6 Criterion 4(a) and ESR6 Criterion 1(b), and hence has not been classified for the purposes of assessing this criterion.

With respect to PS6 Criterion 4(b) and ESR6 Criterion 1(c), the EAAA also does not contain areas that have been assessed in relation to a regional or national systematic conservation assessment. Whilst protected areas and KBAs do occur within a 50 km radius of the Project, these are not considered to meet the definition of a systematic conservation assessment of ecosystem threat. Furthermore, the desert steppe and semi-desert ecosystems present in the EAAA are widespread throughout the Gobi Desert, including southern Mongolia from the Trans-Altai Gobi in the west and eastward to the Alashan Gobi and Eastern Gobi, as well as sections of the Gobi in inner Mongolia, northern China. Therefore, the thresholds for critical habitat under Criterion 4 are not considered to be met.

B5.3 PS6 CRITERION 5: KEY EVOLUTIONARY PROCESSES

IFC PS6 describes the thresholds of Criterion 5 as follows:

- The physical features of a landscape that might be associated with particular evolutionary processes (for example, isolated areas, areas of high endemism, spatial heterogeneity, environmental gradients, edaphic interfaces, biological corridors or sites of demonstrated importance to climate change adaptation); and/or
- Subpopulations of species that are phylogenetically or morphogenetically distinct and may be of special conservation concern given their distinct evolutionary history. The latter includes evolutionarily significant units and evolutionarily distinct and globally endangered species.

No quantitative thresholds exist for Criterion 5, therefore determination of any critical habitat-qualifying values under this criterion requires expert opinion and qualitative value judgment. There are no physical features within the EAAA that are known to be associated with evolutionary processes that are distinct from the wider landscape of the East Gobi Desert Steppe ecoregion. Given the sparse vegetation, composed mainly of widespread steppe and desert plant species with limited evidence of local endemism (or range restriction), as well as the presence of wide-ranging fauna and low density of animal species overall, it is very unlikely that any key evolutionary processes could occur in the Project area. As a result, it is not considered that the EAAA meets the thresholds for CH Criterion 5.

B6. FINDINGS OF PRIORITY BIODIVERSITY FEATURES ASSESSMENT

Overall, a total of 62 species qualify as PBFs per EBRD ESR6 criteria and thresholds, as summarized below and listed in ***Table B6-1***.

- Four (4) species meet the thresholds for criterion 2(b), i.e. species recorded in the Project's area of impact during baseline surveys that are classified as VU, EN or CR on the IUCN Red List. These include the Saker Falcon (*Falco cherrug*), Steppe Eagle (*Aquila nipalensis*), Great Bustard (*Otis tarda*), and Goitered Gazelle (*Gazella subgutturosa*). Note that these four species also qualify as PBFs under criterion 4(a).
- Five (5) species meet the thresholds for criterion 2(c), i.e. species recorded in the area of impact during baseline surveys that are EN or CR on the Mongolian Red List. These include the Short-toed Snake Eagle (*Circaetus gallicus*), Asiatic Wild Ass (*Equus hemionus*), Mongolian Gazelle (*Procapra gutturosa*), Argali (*Ovis ammon*), and *Amygdalus mongolica*. Note that the Short-toed Snake Eagle, Asiatic Wild Ass, Mongolian Gazelle, and Argali also qualify as PBFs under criterion 4(a).
- 61 migratory species meet the thresholds for criterion 4(a), i.e. migratory species recorded in the area of impact during baseline surveys, including 56 birds and 5 mammals considered PBFs in the EAAAs. A number of these species also meet criterion 2(b) and/or criterion 2(c), as mentioned above.

TABLE B6-1: SPECIES QUALIFYING AS PRIORITY BIODIVERSITY FEATURES (EBRD ESR6)

No.	Scientific Name	Common Name	IUCN Red List	Mongolian Red List	EBRD ESR6 Criteria
Avifauna					
1	*Falco cherrug*	Saker Falcon	EN	VU	Criteria 2(b), 4(a)
2	*Aquila nipalensis*	Steppe Eagle	EN	LC	Criteria 2(b), 4(a)
3	*Otis tarda*	Great Bustard	EN	VU	Criteria 2(b), 4(a)
4	*Circaetus gallicus*	Short-toed Snake Eagle	LC	EN	Criteria 2(c), 4(a)
5	*Aegypius monachus*	Cinereous Vulture	NT	LC	Criterion 4(a)
6	*Gyps himalayensis*	Himalayan Griffon	NT	LC	Criterion 4(a)
7	*Accipiter nisus*	Eurasian Sparrowhawk	LC	LC	Criterion 4(a)
8	*Alauda arvensis*	Eurasian Skylark	LC	LC	Criterion 4(a)
9	*Anthus hodgsoni*	Olive-backed Pipit	LC	LC	Criterion 4(a)
10	*Aquila chrysaetos*	Golden Eagle	LC	LC	Criterion 4(a)
11	*Buteo hemilasius*	Upland Buzzard	LC	NE	Criterion 4(a)
12	*Buteo japonicus*	Eastern Buzzard	LC	NE	Criterion 4(a)

No.	Scientific Name	Common Name	IUCN Red List	Mongolian Red List	EBRD ESR6 Criteria
13	*Calcarius lapponicus*	Lapland Longspur	LC	LC	Criterion 4(a)
14	*Calliope calliope*	Siberian Rubythroat	LC	LC	Criterion 4(a)
15	*Carpodacus erythrinus*	Common Rosefinch	LC	LC	Criterion 4(a)
16	*Charadrius leschenaultii*	Greater Sandplover	LC	LC	Criterion 4(a)
17	*Circus cyaneus*	Hen Harrier	LC	LC	Criterion 4(a)
18	*Corvus dauuricus*	Daurian Jackdaw	LC	LC	Criterion 4(a)
19	*Cuculus canorus*	Common Cuckoo	LC	LC	Criterion 4(a)
20	*Cuculus saturatus*	Oriental Cuckoo	LC	LC	Criterion 4(a)
21	*Curruca nana*	Asian Desert Warbler	LC	LC	Criterion 4(a)
22	*Cygnus cygnus*	Whooper Swan	LC	LC	Criterion 4(a)
23	*Emberiza pallasi*	Pallas's Bunting	LC	LC	Criterion 4(a)
24	*Emberiza pusilla*	Little Bunting	LC	LC	Criterion 4(a)
25	*Eremophila alpestris*	Horned Lark	LC	LC	Criterion 4(a)
26	*Falco amurensis*	Amur Falcon	LC	LC	Criterion 4(a)
27	*Falco columbarius*	Merlin	LC	LC	Criterion 4(a)
28	*Falco naumanni*	Lesser Kestrel	LC	LC	Criterion 4(a)
29	*Falco tinnunculus*	Common Kestrel	LC	LC	Criterion 4(a)
30	*Ficedula albicilla*	Red-throated Flycatcher	LC	LC	Criterion 4(a)
31	*Geokichla sibirica*	Siberian Thrush	LC	LC	Criterion 4(a)
32	*Jynx torquilla*	Eurasian Wryneck	LC	LC	Criterion 4(a)
33	*Lanius cristatus*	Brown Shrike	LC	LC	Criterion 4(a)
34	*Lanius excubitor*	Great Grey Shrike	LC	LC	Criterion 4(a)
35	*Lanius isabellinus*	Isabelline Shrike	LC	LC	Criterion 4(a)
36	*Melanocorypha mongolica*	Mongolian Lark	LC	LC	Criterion 4(a)
37	*Milvus migrans*	Black Kite	LC	LC	Criterion 4(a)
38	*Motacilla alba*	White Wagtail	LC	LC	Criterion 4(a)
39	*Motacilla cinerea*	Grey Wagtail	LC	LC	Criterion 4(a)
40	*Motacilla citreola*	Citrine Wagtail	LC	LC	Criterion 4(a)

No.	Scientific Name	Common Name	IUCN Red List	Mongolian Red List	EBRD ESR6 Criteria
41	*Muscicapa dauurica*	Asian Brown Flycatcher	LC	LC	Criterion 4(a)
42	*Oenanthe deserti*	Desert Wheatear	LC	LC	Criterion 4(a)
43	*Oenanthe oenanthe*	Northern Wheatear	LC	LC	Criterion 4(a)
44	*Oenanthe pleschanka*	Pied Wheatear	LC	LC	Criterion 4(a)
45	*Pernis ptilorhynchus*	Oriental Honey-buzzard	LC	LC	Criterion 4(a)
46	*Phalacrocorax carbo*	Great Cormorant	LC	LC	Criterion 4(a)
47	*Phoenicurus auroreus*	Daurian Redstart	LC	LC	Criterion 4(a)
48	*Phylloscopus proregulus*	Pallas's Leaf Warbler	LC	LC	Criterion 4(a)
49	*Phylloscopus trochiloides*	Greenish Warbler	LC	LC	Criterion 4(a)
50	*Platalea leucorodia*	Eurasian Spoonbill	LC	LC	Criterion 4(a)
51	*Syrrhaptes paradoxus*	Pallas's Sandgrouse	LC	LC	Criterion 4(a)
52	*Tadorna ferruginea*	Ruddy Shelduck	LC	LC	Criterion 4(a)
53	*Turdus eunomus*	Dusky Thrush	LC	LC	Criterion 4(a)
54	*Turdus ruficollis*	Red-throated Thrush	LC	LC	Criterion 4(a)
55	*Upupa epops*	Eurasian Hoopoe	LC	LC	Criterion 4(a)
56	*Zoothera aurea*	White's Thrush	LC	LC	Criterion 4(a)
Mammals					
57	*Equus hemionus*	Asiatic Wild Ass	NT	EN	Criteria 2(c), 4(a)
58	*Gazella subgutturosa*	Goitered Gazelle	VU	VU	Criterion 2(b), 4(a)
59	*Procapra gutturosa*	Mongolian Gazelle	LC	EN	Criteria 2(c), 4(a)
60	*Ovis ammon*	Argali	NT	EN	Criteria 2(c), 4(a)
61	*Vespertilio murinus*	Parti-coloured Bat	LC	LC	Criterion 4(a)
Flora					
62	*Amygdalus mongolica*	-	NE	EN	Criterion 2(c)

Note: EN – Endangered; VU – Vulnerable; NT – Near Threatened; DD – Data Deficient; LC – Least Concern; NE – Not Evaluated.

B7. CONCLUSION AND IMPLICATIONS FOR THE PROJECT

B7.1 NO NET LOSS FOR NATURAL HABITATS AND PRIORITY BIODIVERSITY FEATURES

The findings indicate that the Project is situated within predominantly natural habitat (desert-steppe rangelands), which make up <99% of the Biodiversity AoI. IFC PS6 paragraph 14 requires that the Project does not significantly convert or degrade natural habitats[15], unless all of the following are demonstrated:

- No other viable alternatives within the region exist for development of the project on modified habitat;
- Consultation has established the views of stakeholders, including Affected Communities, with respect to the extent of conversion and degradation; and
- Any conversion or degradation is mitigated according to the mitigation hierarchy.

In addition, per IFC PS6 paragraph 15, in areas of natural habitat, mitigation measures will be designed to achieve no net loss[16] of biodiversity where feasible. Appropriate actions include:

- Avoiding impacts on biodiversity through the identification and protection of set-asides[17];
- Implementing measures to minimize habitat fragmentation, such as biological corridors;
- Restoring habitats during operations and/or after operations; and
- Implementing biodiversity offsets.

Similarly, EBRD ESR6 also sets out requirements for Projects where Priority Biodiversity Features are affected, including the following:

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

In accordance with IFC PS6 and EBRD ESR6 guidelines, as well as consultations with IFC and EBRD in September 2026, it is recommended that a Biodiversity Action Plan (BAP) is developed for the Project, documenting the objectives, strategy, and management measures to mitigate residual impacts to achieve no net loss of natural habitats and Priority Biodiversity Features affected by the Project or critical habitat. Each objective should outline a series of actions and

[15] IFC PS6 footnote 7: Significant conversion or degradation is (i) the elimination or severe diminution of the integrity of a habitat caused by a major and/or long-term change in land or water use; or (ii) a modification that substantially minimizes the habitat's ability to maintain viable populations of its native species.
[16] IFC 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).
[17] IFC PS6 footnote 10: Set-asides are land areas within the project site, or areas over which the client has management control, that are excluded from development and are targeted for the implementation of conservation enhancement measures. Set-asides will likely contain significant biodiversity values and/or provide ecosystem services of significance at the local, national and/or regional level. Set-asides should be defined using internationally recognized approaches or methodologies (e.g., High Conservation Value, systematic conservation planning).

include completion indicators or monitoring targets, the responsible party and a timeframe. A Biodiversity Management Plan (BMP) should also be developed in conjunction with the BAP to capture all biodiversity-related commitments, as well as mitigation and monitoring measures for the construction and operation phases of the Project.

B7.2 NET GAIN FOR CRITICAL HABITATS

As shown in this Critical Habitat Assessment, no biodiversity values found in the Project area qualify the EAAAs as critical habitat, therefore no further steps are required with regards to CH and net gain requirements under IFC PS6 and EBRD ESR6.

APPENDIX A SPECIES NOT QUALIFYING FOR CRITICAL HABITAT

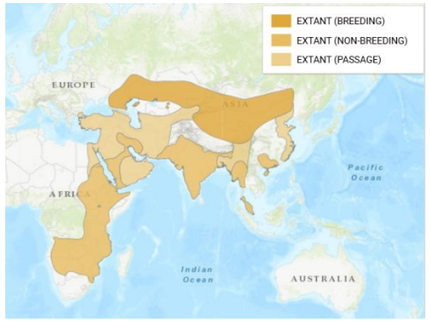
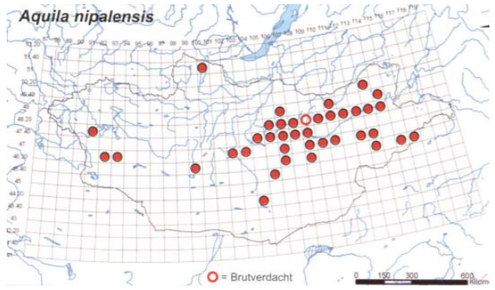
The following section presents the full critical habitat assessments for species that do not meet the thresholds for any of the five CH criteria, with assessments provided in ***Table B-7-1*** and ***Table B-7-2*** for avifauna and mammals, respectively. Each assessment includes the conservation status for each species at the global level (IUCN Red List), regional level (Mongolian Red List for Birds, Mammals, and Plants), and national level (legal protection status of Very rare or Rare as designated under Mongolian legislation and the Mongolian Red Book).

TABLE B-7-1: CRITICAL HABITAT ASSESSMENT OF AVIFAUNA

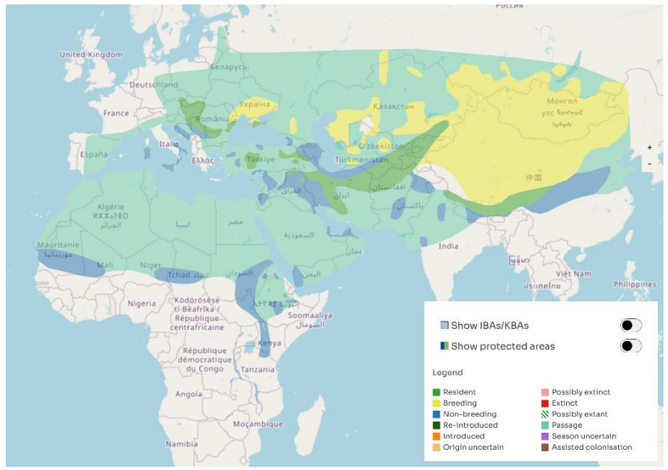
Abbreviations: CR – Critically Endangered, EN – Endangered, VU – Vulnerable, NT – Near Threatened, LC – Least Concern Very Rare – VR, Rare – R, EOO – Extent of Occurrence, AOO – Area of Occupancy.

No	***Scientific Name*** **Common Name**	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
1	*Aquila nipalensis* Steppe Eagle	EN	LC	-	✓	-	✓	The Steppe Eagle is a migratory species that breeds across European Russia and eastward to Kazakhstan, Kyrgyzstan, China, and Mongolia, and winter in the Middle East, South Asia, and southern Africa. The species' global EOO is estimated at 12,600,000 km^2 and its area of occupancy has not been quantified. The global population size is estimated at 78,000 – 110,000 individuals (or 52,000 – 73,500 mature individuals and likely less than 37,000 breeding pairs). The most important breeding populations are in western Kazakhstan (12,000 breeding pairs), eastern Kazakhstan (9,000 breeding pairs), Western Mongolia/Russia (3,000 breeding pairs, with the majority in the Altai-Sayan region of Russia), and Central Mongolia (4,000 breeding pairs).[18] Steppe Eagles have also been recorded in southern Mongolia including in the Gobi-Altai Mountain Range (less than 2,500 m above sea level) and Northern Gobi. However, it very rarely breeds in the Trans-Altai Gobi and the Eastern Gobi Depression regions in which the Project is situated and primarily migrates through these areas.[19] Breeding season occurs between mid-April or early-May to July, after which they migrate to their wintering grounds between August and November. Scientific literature indicates that breeding is not typically observed in southern Mongolia (particularly in the Eastern Gobi Desert)[20, 21, 22], therefore this species' status within the Project's EAAA is likely as a passage migrant as they head to their wintering grounds. This species typically occurs in steppe and semi-desert habitats.[23] They build nests as large platforms on the ground, although recent habitat alterations have appeared to shift nests a few metres higher on natural (e.g. trees, cliffs, rock columns, etc.) and artificial/man-made substrates (e.g. poles, roof of deserted buildings, waste sites, etc.). It feeds primarily on small mammals, as well as occasionally on small birds.[24] The species' population is decreasing due to habitat destruction (particularly conversion of steppe into agricultural lands), persecution, and collisions with power lines. It was assessed as Endangered on the IUCN Red List in 2020 due to an extremely rapid population decline within its European range. The majority of its range lies outside Europe where it was previously not thought to be declining at a	Overall, the Project's EAAA of 3,020.76 km^2 is negligible (<0.03%) compared to the species' EOO (12,600,000 km^2). Available data indicates that the Steppe Eagle rarely occurs in the Eastern Gobi region and when it does, it is primarily a passage migrant travelling between its breeding and wintering grounds, therefore no breeding activity has been documented from the East Gobi region, nor observed during the baseline survey period. Furthermore, only three (3) individuals were observed during the September 2024 surveys, while no individuals were recorded throughout the rest of the survey period (August and November 2024, and January, April and May 2025). This level of occurrence is lower than expected for the autumn migration season, potentially due to the Steppe Eagle's preference for mountain tops when on migration, whereas a large portion of the biodiversity study area consists of low hills, valleys and depressions in open areas. Based on this, it is considered unlikely that Project's EAAA supports ≥ 0.5% of the global population (at least 390 to 550 individuals) and ≥ 5 reproductive units (at least 5 breeding pairs). **The Steppe Eagle does not meet the**	No

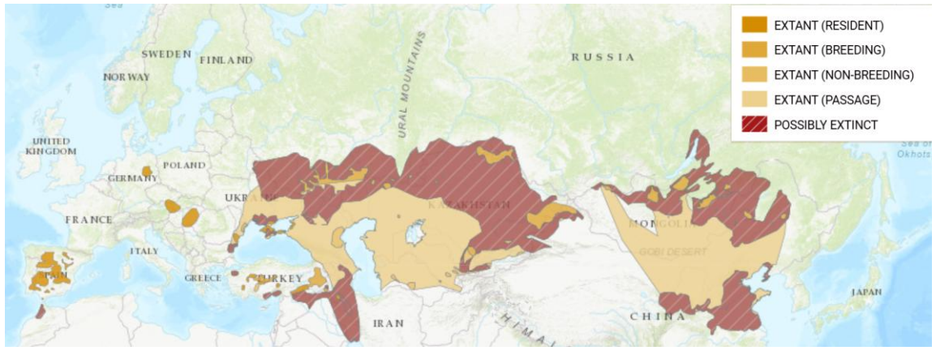
[18] BirdLife International. 2021. Aquila nipalensis. The IUCN Red List of Threatened Species 2021: e.T22696038A205452572. https://dx.doi.org/10.2305/IUCN.UK.2021-3.RLTS.T22696038A205452572.en.
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[23] Ibid.
[24] Gombobaatar, S. et al. 2012. Breeding Ecology of the Steppe Eagle (*Aquila nipalensis*) in Mongolia. Ornis Mongolica, 1(1):13-19. https://www.researchgate.net/publication/258278480_Breeding_Ecology_of_the_Steppe_Eagle_Aquila_nipalensis_in_Mongolia

No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
								sufficiently rapid rate to approach the threshold for Vulnerable, though it is currently suspected that the population outside Europe may be exposed to greater threats than had been expected. The Mongolian Red List assessment from 2009 listed the Steppe Eagle as regionally Least Concern, however this may now be outdated given recent evidence suggesting declines outside Europe. During the baseline surveys, three (3) Steppe Eagles were recorded over 2 observations in the WTG area during the September 2024 surveys, which coincides with its migration period. No breeding activity or nests were recorded from the surveys. Three observations within the EAAA boundary were reported on the citizen science databases eBird and iNaturalist in May 2019, October 2019, and October 2020.  Global distribution range of the Steppe Eagle (IUCN Red List).  Potential breeding areas of the Steppe Eagle in Mongolia (Stubbe *et al.*, 2010)	**thresholds for Critical Habitat under PS6 Criterion 1(a) and ESR6 Criterion 2(b).** Similarly, the EAAA is also not considered to sustain ≥ 1% of the global population (on a cyclical or otherwise regular basis) or ≥ 10% during periods of environmental stress. **The Steppe Eagle does not meet the thresholds for Critical Habitat under PS6 Criterion 3 or ESR6 Criterion 4.**	
2	*Falco cherrug* Saker Falcon	EN	VU	-	✓	-	✓	The Saker Falcon is an endangered migratory species that is a partial migrant and resident breeder in Mongolia. The species' EOO is estimated at 19,100,000 km^2 and the AOO has not been quantified. The global population size is estimated at 12,200 – 29,800 mature individuals (or 6,100 – 14,900 breeding pairs), of which approximately 4,000 – 10,000 mature individuals (2,000 – 5,000) pairs occur in Mongolia. Therefore, the country hosts around 33% of the global population (or 4,026 – 9,834 individuals).[25] The species' density in the eastern Gobi of Mongolia is estimated at 0.13 breeding pairs per 100 km^2.[26] It is known to breed in the Eastern Gobi Depression and the Trans-Altai Gobi, but can also be found across all of Mongolia in a variety of habitats, except for wetlands, taiga forests, deep forests, sand dunes, and areas that lack nesting substrates in the Gobi Desert. [27] Fledgling falcons migrate to their wintering grounds in north and northwest China while some adults remain in Mongolia depending on food availability and winter conditions. Migratory Saker Falcons arrive back in their breeding grounds around March.[28] Thus, in the context of the EAAA, this species is indeed a resident breeder and partial migrant. Outside of Mongolia, the species' breeding range extends across Central Asia and	Overall, the Project's EAAA of 3,020.76 km^2 is negligible (<0.02%) compared to the species' EOO (19,100,000 km^2). Only nine (9) individuals were observed over 8 observations (average of 1.1 individuals seen per record) in the Project area during the August 2024 and January, April and May 2025 baseline surveys, while no occurrences were observed in September and November 2024. Given an approximate density of 0.13 breeding pairs per 100 km^2 (according to available estimates)—which equates to a density of 3.93 breeding pairs in EAAA or around 8 individuals within the EAAA, the baseline survey results align with scientific literature on Saker Falcon abundance in the East Gobi region.	No

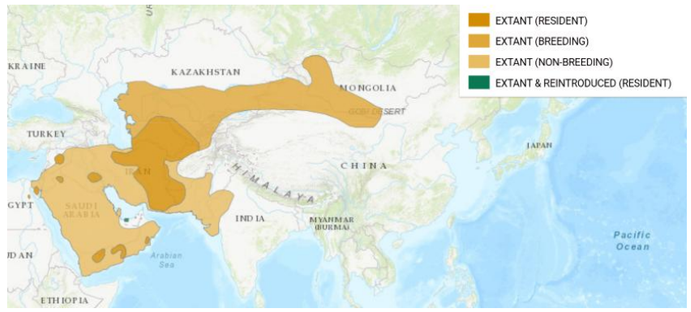
[25] Ibid.
[26] Dixon, A., Ming, M., and Batbayar, N. 2015. Importance of the Qinghai-Tibetan plateau for the Endangered Saker Falcon *Falco cherrug*. Forktail 31(2015): 37-42. https://static1.squarespace.com/static/5c1a9e03f407b482a158da87/t/5d39d6b0a8b7f60001b046c8/1564071601475/Saker-Falcon.pdf
[27] Gombobaatar, S. and Monks, E.M. (compilers), Seidler, R., Sumiya, D., Tseveenmyadag, N., Bayarkhuu, S., Baillie, J. E. M., Boldbaatar, Sh., Uuganbayar, Ch. (editors) (2011). Regional Red List Series Vol 7. Birds. Zoological Society of London, National University of Mongolia and Mongolian Ornithological Society.
[28] Ibid.

No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
								Eastern Europe while its wintering grounds range from southern Asia, North and East Africa, and Southern Europe.[29]  This migratory raptor typically inhabits open grassy landscapes such as desert edges, semi-desert steppes, and agricultural and arid montane areas. They exhibit preference for flat or rolling terrain with sparse vegetation—similar to the open plains of desert steppe present in the EAAA—which facilitate hunting. This species nests on cliffs, in tree hollows, and may use the nests of other medium to large-sized birds. It forages in grassy landscapes including steppes, semi-desert, desert edges, agricultural fields, and montane areas.[30] Saker Falcons primarily hunt for mid-sized terrestrial rodents, especially *Spermophilus spp.* (ground squirrels), and thus have physically adapted to hunting close to the ground in open terrain with rapid acceleration and high manoeuvrability. The species' population is declining due to collision and electrocution on power lines, habitat loss and degradation as well as decreased prey availability due to conversion to agricultural lands, persecution (e.g. shooting and poisoning by pigeon keepers), secondary poisoning from agrochemicals, and hunting /trapping for the falconry trade. Nine (9) Saker Falcons were recorded during the baseline surveys, including three in August 2024, one in January 2025, four in April 2025, and one in May 2025. [redacted] Within the context of the EAAA, this species is considered a resident breeder. The Saker Falcon was also recorded in and around the Oyu Tolgoi Mine and Khanbumbat Airport area as part of monitoring surveys conducted in 2022 and 2024 for the mine project, though the number of individuals observed is not specified.[31]	Based on the available evidence, it is considered unlikely that Project's EAAA supports ≥ 0.5% of the global population (at least 61 to 149 individuals) and ≥ 5 reproductive units (at least 5 breeding pairs). **The Saker Falcon does not meet the thresholds for Critical Habitat under PS6 Criterion 1(a) and ESR6 Criterion 2(b).** Similarly, the EAAA is also not considered to sustain ≥ 1% of the global population (on a cyclical or otherwise regular basis) or ≥ 10% during periods of environmental stress. **The Saker Falcon does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	
3	*Otis tarda* Great Bustard	EN	VU	R	✓	-	✓	The Great Bustard is a large migratory bird species with a widespread geographic distribution and a large EOO estimated to be 14,400,000 km^2.[32] The global population size is estimated at 29,600 – 33,000 individuals. The eastern subspecies (*O. t. dybowskii*), which breeds in western Mongolia, eastern Russia, and northeast China, is fully migratory and consists of around 1,300 – 2,200 individuals. The population in Mongolia has been quantified and revised several times between 2003	Overall, the Project's EAAA of 3,020.76 km^2 is negligible (<0.02%) compared to the species' EOO (14,400,000 km^2). Only four (4) individuals were observed over 4 observations in the Project area during the November 2024 surveys, and	No

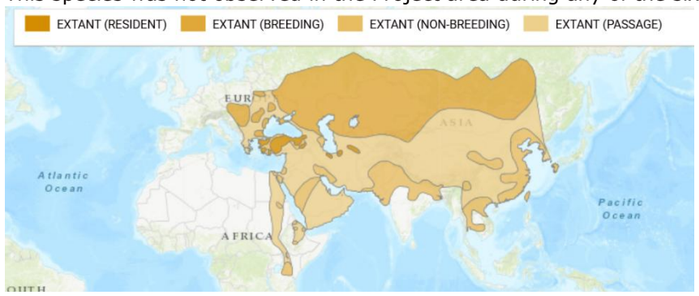
[29] BirdLife International. 2021. Falco cherrug. The IUCN Red List of Threatened Species 2021: e.T22696495A204182473. https://dx.doi.org/10.2305/IUCN.UK.2021-3.RLTS.T22696495A204182473.en.
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[31] 2022 and 2024 Environmental Management Plan Implementation Report for Oyu Tolgoi Copper-Gold Mining Project located in Khanbogd Soum, Umnogovi Province. 2022 Report available at: https://admin.ot.mn/wp-content/uploads/AER_2022.pdf. 2024 Report made available through communication with Oyu Tolgoi Mine and facilitated by the Client.
[32] BirdLife International. 2023. Otis tarda. The IUCN Red List of Threatened Species 2023: e.T22691900A226280431. https://dx.doi.org/10.2305/IUCN.UK.2023-1.RLTS.T22691900A226280431.en.

No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
								and 2017, with most recent estimates of 1,000 mature adults in 2011 and less than 1,000 individuals in 2017.[33] The Great Bustard is a partial migrant and breeding visitor in Mongolia, where it breeds in the country's northern, eastern, northeastern, and western regions (where only isolated populations remain), as well as eastern Russia and northeast China, between May – July (occasionally September), then migrates to its wintering grounds (previously extending to the Korean Peninsula and central China but more birds now winter in northern China).[34, 35] The Great Bustard also passes through southeastern Mongolia (including the Northern Gobi and western portion of the Eastern Gobi) to reach their wintering grounds in China.[36] This species can be found in open steppe habitats dominated by sagebrush (*Artemisia* spp.) and *Stipa* spp., forest steppe, mountain foothills, and semi-desert habitats during its migration. The eastern subspecies can also be found in wetter habitats such as river islands, river valleys, forest edges, and moist meadows. It has undergone rapid population decline across most of its range due to habitat loss, degradation, and fragmentation due to agricultural and industrial expansion (including energy development and linear infrastructure), illegal killing and hunting, and climate change-inducted hazards such as extreme weather events and wildfires.[37] During the baseline surveys, four (4) individuals were observed in the WTG area in November 2024. No breeding activities or nests were observed during the surveys. The Great Bustard was also reported in the Oyu Tolgoi mine area in 2024 during monitoring surveys conducted for the mine project, however the number of individuals observed was not specified.[38] Three observations were recorded on the GBIF database, all of which are located within the Small Gobi A Strictly Protected Area and over 100 km from the Project site. Available scientific literature indicate that the species does not breed in the Project's EAAA, as it only breeds in the northern regions of Mongolia.[39] Baseline surveys also found no evidence of any nesting or breeding activity. 	were not recorded during any of the other five baseline surveys, which indicates very low abundance and occurrence in the Project area. Furthermore, the species is a passage migrant and does not breed in the East Gobi region of southern Mongolia where the Project is situated, neither were breeding activities or nests observed during surveys. Expert consultation conducted with a Mongolian ornithologist also confirmed that Great Bustards only appear in the EAAA while on passage and likely by accident as it typically prefers migrating through open plains and mountain valleys rather than hilly, rocky outcrops and rolling slopes found throughout the EAAA. Therefore, it is considered unlikely that the Project's EAAA supports ≥ 0.5% of the global population (at least 148 to 165) and ≥ 5 reproductive units (at least 5 breeding pairs). **The Great Bustard does not meet the thresholds for Critical Habitat under PS6 Criterion 1 and ESR6 Criterion 2.** Similarly, the EAAA is also not considered to sustain ≥ 1% of the global population (on a cyclical or otherwise regular basis) or ≥ 10% during periods of environmental stress. **The Great Bustard does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	

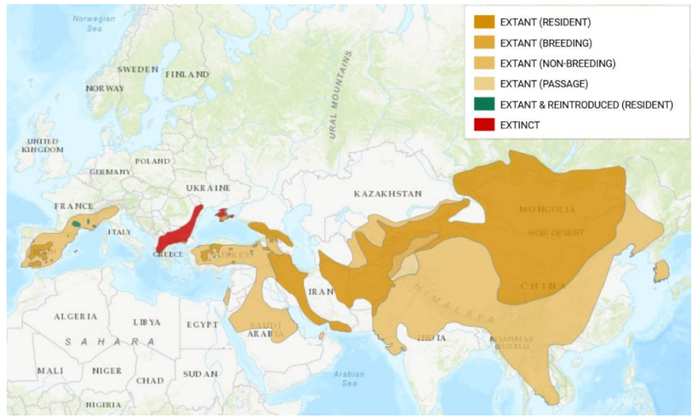
[33] Purev-Ochir, G., Erdenechimeg, B., Battsengel, T., Gungaa, A., and Guo, Y. 2025. Distribution Modelling and Habitat Use of the Eastern Great Bustard (*Otis tarda dybowskii*) in Eastern Mongolia. Mongolian Journal of Biological Sciences 23(1): 21-30. DOI:10.22353/mjbs.2025.23.04
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No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
4	*Chlamydotis macqueenii* Asian Houbara	VU	VU	VR	✓	-	✓	The Asian Houbara is a migratory species with a geographic distribution spanning the Arabian Peninsula to Western and Central Asia (including western and southern Mongolia). The global population size is estimated to be around 33,000 – 67,000 mature individuals, out of which the majority of breeding individuals (49,000 birds) are estimated to occur in Kazakhstan. The species' EOO is an estimated 13,200,000 km^2 and the AOO has not been quantified.[40] In Mongolia, the population density ranged approximately from a maximum of 0.22 birds per km^2 during June to a minimum of 0.03 birds per km^2 in April in the Galba Gobi. It was estimated in 2001 that the total Mongolian population was less than 200 – 300 individuals.[41] The Asian Houbara arrives at breeding sites in Mongolia by early May and remain until September before migrating to their wintering grounds. They inhabit sparsely vegetated semi-desert and desert steppe areas with hard, gravelly soil, and prefer open areas in the Trans-Altai (western Mongolia) and Alashani Gobi (southern-central Mongolia) with shrubs and bushes of Saxaul (*Haloxylon ammodendron*), *Ephedra* spp., *Sympegma regelii, Artemisia spp., Zygophylium xanthoxylon, Amygdalus mongolica, Nitraria sibirica, Reaumuria soongorica,* and *Eurotia seratoides.*[42] This species is assessed to be globally and regionally Vulnerable by the Mongolian Red List of Birds, as well as Very Rare species under the Mongolian Law on Fauna 2012. It is also one of the species that qualifies the Galba Gobi as an Important Bird and Biodiversity Area (IBA). Major threats include hunting and trapping (including legal and illegal activities), egg collection, and habitat loss and degradation due to industrial activities (particularly the petroleum and mining industries), livestock grazing, and conversion of habitats to croplands. No individuals were recorded from the August 2024 – May 2025 baseline surveys, including during specialist surveys carried out to target this species, and interviewed local herders had also not observed any within the study area. It was also not recorded in the vicinity of the Oyu Tolgoi Mine or Khanbumbat Airport during monitoring surveys conducted in 2024.[43] 	The Project's EAAA is negligible (<0.05%) compared to the species' EOO (13,200,000 km^2). In addition, while secondary data sources have recorded this species in the vicinity of the Oyu Tolgoi mine in 2022 (and thus near the end of the Project's overhead transmission line), it was not recorded in and around the mine in 2024 nor throughout the ESIA survey period. This is likely due to the absence of their preferred breeding habitats and the presence of local herders and livestock in the Project area, the disturbances from which may disrupt nesting success.[44] Expert consultation conducted with a Mongolian ornithologist also indicate that the species only appears in very low densities in the Project's EAAA as the area does not contain suitable or preferred habitats for the species, and field surveys conducted in and around Tsogtsettsi and Khanbogd in recent years have not found any observations of the species. Based on available evidence, it is considered unlikely that the Project's EAAA supports globally important concentrations of this VU species, the loss of which would result in the change of the species' IUCN Red List status from VU to EN or CR. **The Asian Houbara does not meet the thresholds for Critical Habitat under PS6 Criterion 1 and ESR6 Criterion 2.** Similarly, the Project's EAAA is not considered to sustain ≥ 1% of the global population (on a cyclical or otherwise regular basis) or ≥ 10% during periods of environmental stress. **The Asian Houbara does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	No
5	*Aquila heliaca*	VU	VU	R	✓	-	✓	The Eastern Imperial Eagle is a migratory species with a widespread geographic distribution. Eastern populations of the species are noted to breed in natural steppe and agricultural habitats. In Mongolia,	The EAAA is considered negligible (<0.02%) compared to the species' EOO, and no individuals	No

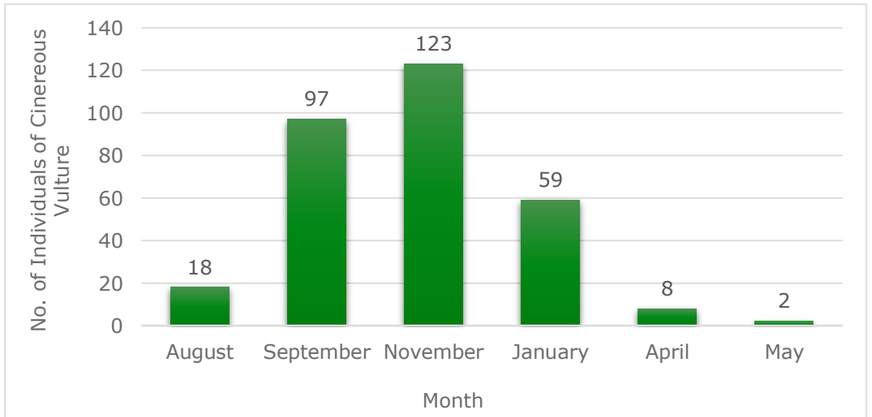
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[42] Ibid.
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No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
	Eastern Imperial Eagle							the species breeds in the Hentii and Hövsgöl Mountain Ranges in northern Mongolia, arriving by May, and typically inhabiting taiga forests, river valleys, and forest steppe. Both juveniles and adults migrate to their wintering grounds between September and November from East and South Asia to the Middle East, the Arabian peninsula, and eastern Africa. It has also been recorded overwintering as far north as Mongolia though this is not known to be common. Preferred habitats in its wintering range include open grasslands, plains, semi-desert areas, and wetlands.[45] The global population size is estimated to be 3,750 – 15,000 individuals and the species' EOO (including its global breeding, passage, and resident ranges) is estimated at between 14,900,000 km^2 (according to IUCN) to 15,400,000 km^2 (according to BirdLife).[46, 47] The population is expected to be declining due to habitat loss and degradation (including logging and land conversion), prey depletion, nest robbing, as well as adult mortality as a result of persecution and collision with powerlines. This species was not observed in the Project area during any of the six ESIA baseline surveys, neither were they recorded in the Oyu Tolgoi Mine monitoring reports. No individuals have been reported in the EAAA on databases such as iNaturalist, eBird and GBIF, with the nearest recorded occurrence being 125 km from the EAAA. 	of this species were observed during the baseline surveys nor recorded within the EAAA in secondary data. Therefore, it is considered unlikely that the Project's EAAA supports globally important concentrations of this VU species, the loss of which would result in the change of the species' IUCN Red List status from VU to EN or CR. **The Eastern Imperial Eagle does not meet the thresholds for Critical Habitat under PS6 Criterion 1 and ESR6 Criterion 2.** Similarly, the Project's EAAA is not considered to sustain ≥ 1% of the global population (on a cyclical or otherwise regular basis) or ≥ 10% during periods of environmental stress. **The Eastern Imperial Eagle does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	

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No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
6	Cinereous Vulture *Aegypius monachus*	NT	LC	-	-	-	✓	The Cinereous Vulture is a migratory species with a widespread geographic distribution spanning Central Asia, the Caucasus and Middle East, and southern Europe for its breeding range while its wintering range extends from East and South Asia to the Middle East and the Arabian Peninsula. The species' extent of occurrence (EOO) is estimated to be 22,400,000 km^2. The global population size is estimated at 16,800 – 22,800 mature individuals (which equates to 25,200 – 34,200 individuals and 8,400 – 11,400 breeding pairs). Of these, 5,500 – 8,000 pairs are located in Asia (or 65 – 70% of the total population), while the rest are in Europe.[48] Mongolia supports the largest wild population of Cinereous Vultures in the world, accounting for almost 50% of the global population.[49] The species is considered widespread throughout the country, hence its LC status on the Mongolian Red List and lack of legal protection under the Law on Fauna. The population trend is thought to be increasing in its European range, though the larger Asian population is likely decreasing, therefore the global population trend is suspected to be undergoing a slow to moderate decline.  Cinereous Vultures high elevations in Asia compared to its European range, occurring in scrub and arid and semi-arid alpine steppe and grasslands up to 4,500 m above sea level. It forages over a variety of open terrain including forests, bare mountains, steppes, and open grasslands. Vultures feed on the carcasses of medium-sized or large mammal carcasses and rarely take live prey. The species is considered a resident breeder and partial migrant within the context of Mongolia (and the EAAA), as resident breeding adults winter in Mongolia while juveniles migrate to other wintering grounds in South Korea, Nepal, and possibly North Korea and China.[50] It breeds in high mountains, forest steppe, steppe, desert steppe and the Gobi Desert in the western, northern, central, and southern regions of Mongolia, including the Eastern Gobi. During breeding season, pairs typically build nests of twigs, dried *Caragana* spp., and other bushes in trees (e.g. elm, poplar and birch) or on cliffs, rocks, and mountain peaks and slopes.[51] Cinereous Vultures' nesting locations and success are positively correlated with the numbers and locations of nomadic herders' livestock throughout the country.[52] While most adult birds remain in Mongolia year-round (with movement patterns not correlated with seasonal variation but rather proximity to nesting areas and food availability), most juveniles migrate	The Cinereous Vulture is present throughout Mongolia, where 50% of the global population can be found. Considering a global population of 16,800 to 22,800 mature individuals, a 1% threshold of the global population—as required by CH Criterion 3(a)—is estimated at 168 to 228 mature individuals. Even when accounting for the global population including non-adults (fledglings or juveniles), 1% of the global population (25,200 to 34,200 individuals) would equate to 252 to 342 birds. Though there were a total of 307 individuals seen over 96 separate observations (some of which may be double-counts) during the baseline surveys, the average number of individuals documented was only 3.19 individuals per observation, with the highest number of individuals recorded in a single observation being 22 vultures. The highest number of observations occurred in November (123 individuals), September (97 individuals) and January (59 individuals). While it was not possible to determine the age of observed individuals for the vast majority of observations, given the seasonal variation in survey results and known patterns in adult/juvenile behaviour, it is likely that most September and November observations are of migrating juveniles (along with some resident adult vultures), while January observations are likely dominated by resident mature birds. Observations of migrating birds are more likely to represent unique individuals while observations of resident birds may include reoccurrence of the same individuals that may be seen on different days or months (and thus overestimation of the local population). Therefore, it is unlikely that the actual total number of individuals in the EAAA	No

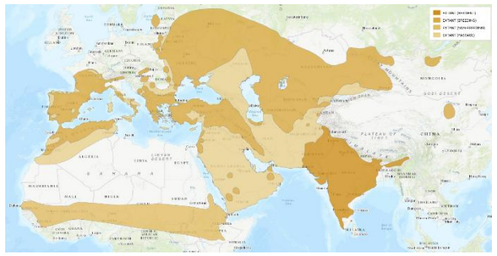
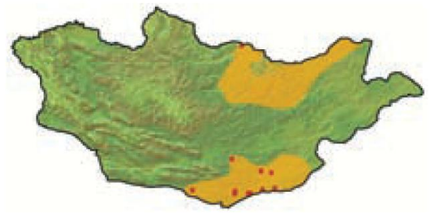
[48] BirdLife International. 2021. Aegypius monachus. The IUCN Red List of Threatened Species 2021: e.T22695231A154915043. https://dx.doi.org/10.2305/IUCN.UK.2021-3.RLTS.T22695231A154915043.en.
[49] Andevski, J., Tavares, J., Williams, N. P., Moreno-Opo, R., Botha, A. and Renell, J. 2017. Flyway Action Plan for the Conservation of the Cinereous Vulture (2017). CMS Raptors MOU Technical Publication No. 6. Coordinating Unit of the CMS Raptors MOU, Abu Dhabi, United Arab Emirates.
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[51] Ibid.
[52] Andevski, J., Tavares, J., Williams, N. P., Moreno-Opo, R., Botha, A. and Renell, J. 2017. Flyway Action Plan for the Conservation of the Cinereous Vulture (2017). CMS Raptors MOU Technical Publication No. 6. Coordinating Unit of the CMS Raptors MOU, Abu Dhabi, United Arab Emirates.

No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
								to their wintering grounds in late-September to November, arriving back in Mongolia during spring migration by April to May.[53, 54, 55] Primary threats to the Cinereous Vulture include direct mortality due to humans (e.g. shooting, poisoning, destruction of nests) as well as decreased availability of food due to changing agricultural practices that reduce the number of domestic livestock in its range. Wind farms and transmission lines have also been found to contribute to population reductions due to electrocution and collision mortality. During the biodiversity baseline surveys, a total of 307 individuals of the Cinereous Vulture were seen over 96 separate observations in the Project area, with the average number of individuals recorded equating to 3.19 individuals per observation. It should be noted that some of these may be double-counts of the same individuals given the Cinereous Vulture is a resident in the EAAA. No nests or nesting activities were documented during the baseline surveys. The maximum number of individuals recorded in a single observation is 22 Cinereous Vultures in September 2024, followed by 17 individuals also documented in the same survey period. The highest number of observations occurred in November (123 individuals), September (97 individuals) and January (59 individuals), as shown in the figure below. Notably, the number of Cinereous Vultures observed in spring are significantly lower than autumn (8 and 2 individuals in April and May, respectively), potentially due to adults moving out of the Project area to their preferred nesting grounds (as none were observed during surveys) and juveniles migrating back to Mongolia through other routes that do not pass through the Project area.  In addition, numerous observations of the Cinereous Vulture have been recorded in the EAAA on the eBird[56] and GBIF[57] databases, with many of these observations concentrated within the Galba Gobi (south of the EAAA), while fewer observations are documented in the wind farm area. The species	meets the quantitative threshold of 252 – 342 birds. Furthermore, in accordance with the 2023 EBRD technical memorandum on 'Determining Biodiversity Management Requirements Related to Airspace around Wind Energy Facilities', a CHA for wind power projects vis-à-vis large, soaring, and/or migratory birds should be conducted with respect to airspace where there is an associated important terrestrial area. This may include airspace above terrestrial/aquatic habitats of importance utilized by birds, airspace linking such habitats, and airspace associated with topographical or physical features that result in a 'bottleneck' where bird occurrences become concentrated. Desert steppe habitats utilized by Cinereous Vultures are common and widespread across the region, and thus the habitats within the EAAA are not of global significance to the species. The EAAA also does not contain any important terrestrial features that constitutes a bottleneck causing significant concentrations of migrating vultures (e.g. a mountain range, as the EAAA consists of rolling hills and flat plateaus). Given the above, it is therefore considered that the Project's EAAA does not sustain ⩾ 1% of the global population on a cyclical or otherwise regular basis. **The Cinereous Vulture does not meet the threshold for Critical Habitat under PS6 Criterion 3(a) and ESR6 Criterion 4(a).**	

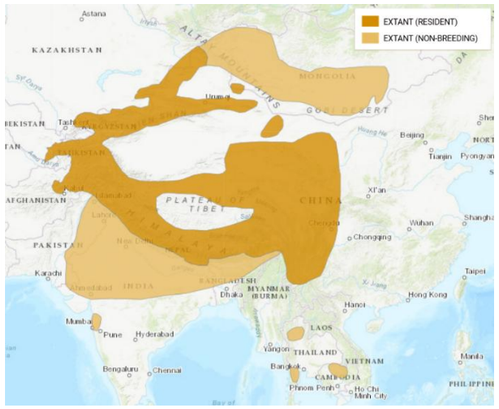
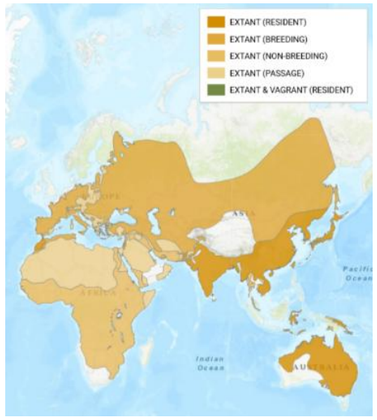
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[55] Batbayar, N., Reading, R., Kenny, D., Natsagdorj, T. and Won Kee, P. 2008. Migration and movement patterns of Cinereous Vultures in Mongolia. Falco, 32: 5–7.
[56] eBird. 2025. Observations of the Cinereous Vulture. Available at: https://ebird.org/map/cinvul1?neg=true&env.minX=102.35126306741766&env.minY=42.14915536823372&env.maxX=109.33856775491766&env.maxY=44.5885155689617&zh=true&gp=false&ev=Z&excludeExX=false&excludeExAll=false&mr=1-12&bmo=1&emo=12&yr=all&byr=1900&eyr=2025
[57] Global Biodiversity Information Facility. 2025. Observations of the Cinereous Vulture. Available at: https://www.gbif.org/occurrence/map?q=cinereous%20vulture&has_coordinate=true&has_geospatial_issue=false&taxon_key=5229165

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								was also recorded in and around the Oyu Tolgoi Mine and Khanbumbat Airport areas (which overlap with the EAAA) as part of monitoring surveys conducted in 2022 and 2024 for the mine project, though the number of individuals observed is not specified.[58]		
7	*Circaetus gallicus* Short-toed Snake Eagle	LC	EN	VR	✓	-	✓	The Short-toed Snake Eagle is a migratory raptor that breeds in the Palearctic region and winters in tropical North Africa and South Asia, with resident populations also on the Indian subcontinent. The species' EOO is 48,800,000 km^2 and its global population size is estimated at 58,200 – 93,800 mature individuals. This species is a breeding migrant in Mongolia that arrives in the country by May and remains until September when it leaves for its wintering grounds (with the exact timing dependent on food availability and weather conditions). Few breeding birds and/or nests have been documented in southern Mongolia from Tsogt-Ovoo soum (approximately 110 km from the Project), as well as 16 other observations in locations across Omnogobi Province (Shutegiin Bayangol, Ooshiin Gobi, Noyon soum, and Galbyn Gobi), as well as in northern Mongolia (Selenge river valley and Khentii). Breeding pairs build stick nests in elm trees in the Gobi Desert. On migration, individuals occur singly or in small flocks of 3-4 individuals, traversing through areas of open forest steppe, steppe, and the Gobi Desert.[59] The Short-toed Snake Eagle is not considered globally threatened (classified as LC on the IUCN Red List), but is assessed to be regionally endangered by the Mongolian Red List of Birds (2011) and listed as Very Rare under the Mongolian Law on Fauna and Red Book. It was assessed as regionally endangered in 2009 due to the population in Mongolia being estimated at less than 250 mature individuals. However, more recent estimates of the Mongolian population size are not available, and it should be noted that the Mongolian Red List assessment is now outdated and requires an updated examination. The species' main threats in Mongolia include habitat loss and degradation from livestock overgrazing (particularly in/near breeding sites), mining operations, infrastructure development, tourism, harvesting, and mortalities from hunting and collision with transmission lines. During the baseline surveys, one (1) individual was observed in the transmission line area in August 2024. No other observations were made during any of the other five survey months. Monitoring surveys conducted in September 2024 for the Oyu Tolgoi mine project recorded 8 individuals of the Short-toed Snake Eagle in and around the mine compound and Khanbumbat Airport.[60] In addition, the Oyu Tolgoi mine's 2024 monitoring report concluded that the number of breeding pairs in the mine area has not changed over the past 10 years.[61]	As the Short-toed Snake Eagle is classified as Least Concern on the IUCN Red List, it does not meet Criteria 1(a) and 1(b) as it is on a CR, EN or VU species. However, as it is Endangered on the Mongolian Red List and categorized as Very Rare under the Law on Fauna, it will be assessed against CH Criterion 1(c). Overall, the species' Mongolian range is poorly known and there is limited available evidence of a particularly large or high-density populations in southern Mongolia. Furthermore, the regional population estimate of less than 250 mature individuals has not been updated for 14 years and thus is likely inaccurate. However, even given this estimate, the number of individuals documented in the Project area still accounts for less than 5% of the regional population in Mongolia. Additionally, the EAAA likely constitutes less than 1% of the species' documented extent of occurrence in Mongolia (including southeastern and northern Mongolia, equating to at least 350,000 km^2). Therefore, it is considered unlikely that the Project's EAAA contains important concentrations of this regionally listed EN species. **The Short-toed Snake Eagle does not meet the thresholds for Critical Habitat under PS6 Criterion 1(c) and ESR6 Criterion 2(c).** Similarly, the Project's EAAA is also not considered to sustain ≥ 1% of the global population (on a cyclical or otherwise regular basis) or ≥ 10% during periods of environmental stress. **The Short-toed Snake Eagle does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	No

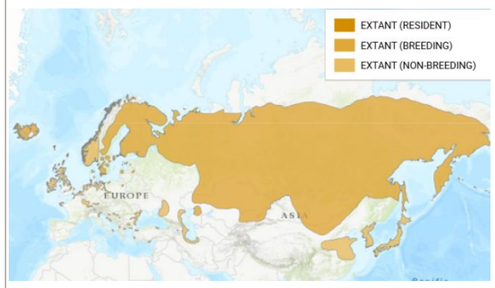
[58] 2022 and 2024 Environmental Management Plan Implementation Report for Oyu Tolgoi Copper-Gold Mining Project located in Khanbogd Soum, Umnogovi Province. 2022 Report available at: https://admin.ot.mn/wp-content/uploads/AER_2022.pdf. 2024 Report made available through communication with Oyu Tolgoi Mine and facilitated by the Client.
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[60] 2024 Environmental Management Plan Implementation Report for Oyu Tolgoi Copper-Gold Mining Project located in Khanbogd Soum, Umnogovi Province. Made available through communication with Oyu Tolgoi Mine and facilitated by the Client.
[61] Oyu Tolgoi Mine's Independent Environmental and Social Consultant Compliance Monitoring Report of May 2025. Available at: https://admin.ot.mn/wp-content/uploads/EN-Oyu-tolgoi-IESC-Audit-Report-May-2025.pdf

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								 Global Distribution (IUCN Red List)  Distribution in Mongolia (Mongolian Red List)		
8	*Gyps himalayensis* Himalayan Griffon	NT	LC	-	-	-	✓	This species is distributed from western China, Kazakhstan, Uzbekistan, Kyrgyzstan, Tajikistan, Afghanistan and Pakistan, east through the Himalayan Mountain range in India, Nepal and Bhutan, to central China and Mongolia. The species is regarded as common in the Qinghai-Tibetan Plateau, China and parts of Himachal Pradesh, India (especially in Sainj Valley). It is regarded as a widespread altitudinal migrant in Nepal. It appears to be relatively common in Omnogovi province, especially in Gobi Gurvansaikhan National Park (central-southern Mongolia approximately 390 km from the Project) and some adjacent massifs. The species' EOO is estimated at 6,220,000 km^2. The Himalayan Griffon inhabits mountainous areas, mostly at 1,200 - 5,500 m above sea level, but has been recorded up to 6,000 m.[62] Overall, the IUCN Red List estimates a total population of 100,000 - 499,999 individuals (or 66,000-334,000 mature individuals). The population in the Tibetan Plateau, which consists of around 80% of the breeding population, has been estimated at around 230,000 individuals, equating to approximately 153,000 mature individuals.[63] In Mongolia, the species' is a summer visitor and passage migrant that arrives in summering areas by late April or early May, then leaves its breeding sites for wintering grounds by late August or early September. This species possibly breeds in high mountain regions in Mongolia, but breeding activities have not yet been confirmed in the country. Like other vultures, the Himalayan Griffon is a scavenger and primarily feeds on animal carcasses, which it finds by soaring over open areas and mountains. It often joins with Cinereous Vultures and Eurasian Vultures, feeding together in gregarious groups of 3-42 individuals in the Mongolian steppe.[64]	The Himalayan Griffon has a widespread geographic distribution and a relatively large population size. The Project's EAAA is negligible (<0.05%) compared to the species' EOO (6,220,000 km^2). Given the limited sightings of the species in the EAAA during the six baseline surveys (only 1 individual recorded) and from online databases, as well as the presence of other areas across Mongolia where the species is reported to be more common (e.g. Gobi Gurvansaikhan National Park), it is considered unlikely that the Project's EAAA sustains ≥ 1% of the global population on a cyclical or otherwise regular basis (at least 660 to 1,530 mature individuals) or ≥ 10% during periods of environmental stress. **The Himalayan Griffon does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	No

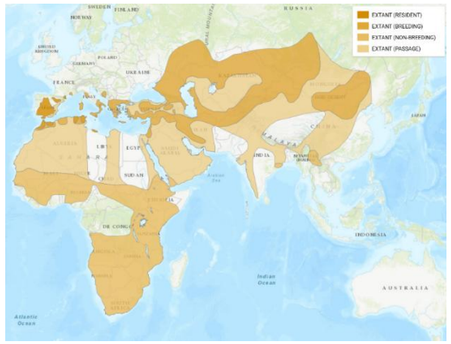
[62] BirdLife International. 2021. Gyps himalayensis. The IUCN Red List of Threatened Species 2021: e.T22695215A204643889. https://dx.doi.org/10.2305/IUCN.UK.2021-3.RLTS.T22695215A204643889.en.
[63] Ibid.
[64] Gombobaatar, S. and Monks, E. M. (Compilers). Seidler, R., Sumiya, D., Tseveenmyadag, N., Bayarkhuu, S., Baillie, J. E. M., Boldbaatar, Sh., Uuganbayar, Ch. (Editors). 2011. Regional Red List Series Vol. 7. Birds. Zoological Society of London, National University of Mongolia and Mongolian Ornithological Society.

No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
								The most serious potential threat to this species is thought to be mortality caused through ingestion of diclofenac and other vulture-toxic non-steroidal anti-inflammatory drugs (NSAIDs) widely used in livestock, particularly in South Asia. Other potential threats include habitat degradation and a shortage of suitable nesting sites, as well as the ingestion of herbicides, insecticides and fungicides. On the Qinghai-Tibet plateau the main threats appear to be chemical control for pika (Ochotona spp.) and the removal of livestock carcasses. Electrocution or collision with energy infrastructure is likely to be a threat across much of the range, however there is currently little documented evidence.[65]  Only one individual was observed during the baseline surveys. No congregatory activities or nests were found during the surveys. Three (3) research-grade observations of the Himalayan Griffon are recorded on iNaturalist[66] from August 2013, July 2019 and May 2021 in and near the Oyu Tolgoi mine area, as well as one observation near the WTG area (May 2019) and at least 10 observations between 2014-2024 in and around Khanbogd and Tsogtsol Sume (around 40-50 km from the EAAA at the nearest point) recorded on eBird.[67]		
9	*Milvus migrans* Black Kite	LC	LC	-	-	-	✓	The Black Kite is a migratory species with an extremely widespread distribution, with breeding birds ranging from western Europe to Central and North Asia to Siberia and wintering in sub-Saharan Africa and South Asia. It is also typically a resident at lower latitudes including regions of Southeast Asia and Australia. It has an estimated EOO of 115,653,659 km^2 and a global population size of approximately 4,000,000 - 5,700,000 mature individuals.  This species is considered one of the most common raptors in the world, found ubiquitously throughout most habitats, including deserts, forests (though avoids dense woodlands), shrublands, grasslands, inland wetlands, coastal habitats, agricultural lands, urban areas, and other human-dominated environments. The population outside of Europe (including Mongolia) is considered overall stable, though some population decline is suspected due to poisoning, hunting, pollution, and land conversion.[68] A total of 141 individuals were recorded over 87 observations during the baseline surveys.	Though the species was recorded in higher numbers (141 individuals) during the baseline surveys, in terms of area, the EAAA is negligible (<0.003%) compared to the EOO of the species. Given the species' extremely large distribution range and large, common and stable global population, it is considered unlikely that the Project's EAAA sustains ≥ 1% of the global population on a cyclical or otherwise regular basis (at least 40,000 – 57,000 individuals) or ≥ 10% during periods of environmental stress. **Therefore, the Black Kite does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	No

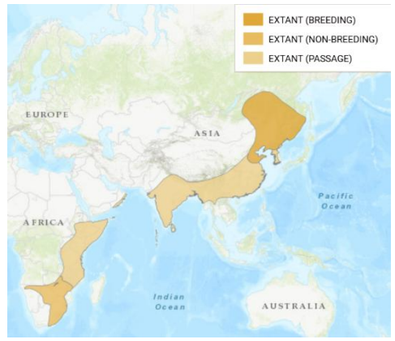
[65] BirdLife International. 2021. Gyps himalayensis. The IUCN Red List of Threatened Species 2021: e.T22695215A204643889. https://dx.doi.org/10.2305/IUCN.UK.2021-3.RLTS.T22695215A204643889.en.
[66] iNaturalist. 2025. Observations of the Himalayan Griffon (*Gyps himalayensis*). Available at: https://www.inaturalist.org/observations?nelat=44.16729772737166&nelng=108.33786385506399&subview=map&swlat=42.41216856051201&swlng=104.84421151131399&taxon_id=5367
[67] eBird. 2025. Observations of the Himalayan Griffon (*Gyps himalayensis*). Available at: https://ebird.org/map/himgri1?neg=true&env.minX=102.35126306741766&env.minY=42.14915536823375&env.maxX=109.33856775491766&env.maxY=44.588515568961725&zh=true&gp=false&ev=Z&excludeExX=false&excludeExAll=false&mr=1-12&bmo=1&emo=12&yr=all&byr=1900&eyr=2025
[68] BirdLife International (2021). Species factsheet: Black Kite Milvus migrans. Downloaded from https://datazone.birdlife.org/species/factsheet/black-kite-milvus-migrans

No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
10	*Cygnus cygnus* Whooper Swan	LC	LC	C	-	-	✓	The Whooper Swan is a migratory species with a widespread distribution ranging from western Europe to Central and North Asia, Siberia and Japan. It has an estimated EOO of 29,500,000, km^2 and a global population size of over 100,000 individuals. The overall population trend is uncertain, as some populations are decreasing, while others are increasing, stable or have unknown trends. It typically breeds near shallow freshwater pools, lakes, slow-flowing rivers, and other inland wetlands with abundant emergent vegetation in taiga zones, and shrub/forest tundra, while non-breeders prefer sheltered coasts on estuaries, lagoons, shallow bays, and inland wetlands.[69] The species is threatened by habitat degradation and loss (such as the reclamation of coastal and inland wetlands), agricultural expansion, wetland drainage for irrigation, industrial and infrastructural developments (e.g. construction of roads and hydroelectric dams), pollution (particularly from oil exploration and spills), collisions with overhead transmission lines and wind turbines, poisoning, hunting, and natural disasters.  A study carried out at a wintering site in Denmark found that large wind turbines (towers 68 m high with blades 66 m in diameter, blades sweeping the heights of 35-101 m) pose less of a collision risk to the species than wind turbines of a medium height (towers 45 m high with blades 48 m in diameter, blades sweeping the heights of 21-69 m). One flock of 40 individuals was observed during the baseline surveys.	Though the species was recorded during the baseline surveys, in terms of area, the EAAA is negligible (<0.01%) compared to the EOO of the species. Considering the species' wide distribution range and large global population size, as well as no observations of large-scale breeding or congregation, it is considered unlikely that the Project's EAAA sustains ≥ 1% of the global population (at least 1,000 individuals) on a cyclical or otherwise regular basis or ≥ 10% during periods of environmental stress. **Therefore, the Whooper Swan does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	No
11	*Charadrius leschenaultia* Greater Sandplover	LC	LC	C	-	-	✓	The Greater Sandplover is a migratory species with an extremely widespread distribution, breeding in Central and North Asia (including Mongolia) then migrating to its wintering grounds from the coast of Northern and Eastern Africa to Central and Northern Asia, South and Southeast Asia, and Australia. It has an estimated EOO of 9,590,000 km^2 and a global population size of approximately 150,000 – 340,000 individuals (or 100,000 – 225,000 mature individuals). During the breeding season, this species is predominantly found in open, dry, treeless, uncultivated areas up to 3,000 m, including rocky plains near mountains in desert or semi-desert. The species usually breeds near water, but in rare cases it will nest up to 20 km away from water bodies. The Greater Sandplover is assessed as Least Concern on the IUCN and Mongolian Red Lists due to its large geographic range and population size. Major threats to this species are predominantly in its non-breeding range due habitat loss and degradation from land reclamation and conversion, though some parts of its breeding range (primarily Turkey) is threatened by the destruction of wetlands and bordering fallow steppe due to drainage and water extraction for irrigation.[70] 	Though a small number of Greater Sandplovers were recorded during baseline surveys, in terms of area, the EAAA is negligible (<0.03%) compared to the EOO of the species. Considering the species' widespread distribution and large global population size, as well as lack of large-scale breeding or congregation activities observed in the Project area, it is considered unlikely that the Project's EAAA sustains ≥ 1% of the global population (at least 1,500 to 3,400 individuals) on a cyclical or otherwise regular basis or ≥ 10% during periods of environmental stress. **Therefore, the Greater Sandplover does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	No

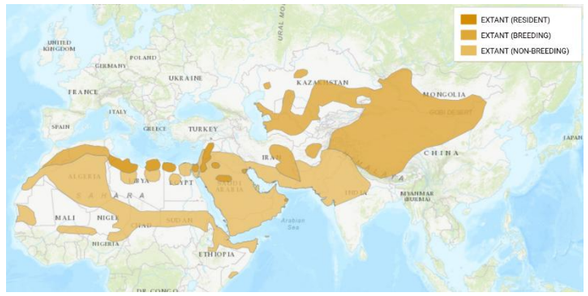
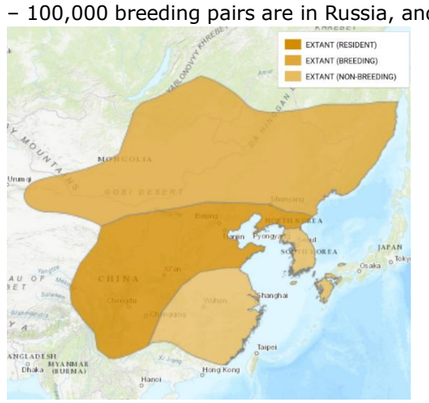
[69] BirdLife International. 2016. Cygnus cygnus. The IUCN Red List of Threatened Species 2016: e.T22679856A85965262. https://dx.doi.org/10.2305/IUCN.UK.2016-3.RLTS.T22679856A85965262.en.
[70] BirdLife International (2019). Species factsheet: Greater Sandplover Charadrius leschenaultii. Downloaded from https://datazone.birdlife.org/species/factsheet/greater-sandplover-charadrius-leschenaultii

No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
								Seven (7) individuals were recorded over 4 observations during the baseline surveys in May 2025, including 5 in the WTG area and 2 in the TL area.		
12	*Falco naumanni* Lesser Kestrel	LC	LC	C	-	-	✓	 The Lesser Kestrel is a migratory raptor that breeds in the northern part of its range (including Mongolia, China, Russia, the Middle East, and western Europe) and winters in Sub-Saharan Africa, particularly South Africa. The majority of the breeding population (approximately 33,000 – 43,000 pairs) occurs in Europe (with half of these in Spain), while Central Asia hosts several thousand breeding pairs. It has an estimated EOO of 24,800,000 km^2 and a global population size of 120,000 – 200,000 individuals (or 80,000 – 134,000 mature individuals). This species is a breeding visitor in Mongolia, arriving in May and leaving for its wintering grounds in September. It is a colonial breeder that utilizes holes and natural cavities of cliffs and rocks, trees, cracks of deserted buildings and manmade substrates, or the deserted nests of other birds. Its breeding habitats include open arid areas in forest steppe, mountain steppe, steppe, desert steppe, and the Gobi Desert.[71] Major threats to this species include habitat loss and degradation (including overgrazing by livestock), agricultural intensification (particularly in South Africa), pesticide use and accidental poisoning. Other threats include climate change-related impacts, collision with overhead transmission lines and wind turbines, and hunting / persecution. This species was assessed as Vulnerable on the IUCN Red List between 2000 – 2008 due to rapid declines in its western European, South African and Asian ranges, but has been recategorized as Least Concern in 2011 – 2021 based on recent evidence indicating stable or slightly positive population trends over the past three generations.[72] A total of 80 Lesser Kestrels were recorded over 48 observations during the baseline surveys, including 41 in the TL area and 39 in the WTG area, in August and September 2024 and January and May 2025.	Though the species was recorded during baseline surveys, in terms of area, the EAAA is negligible (<0.02%) compared to the EOO of the species. Considering the species' widespread distribution and large global population size, it is considered unlikely that the Project's EAAA sustains ≥ 1% of the global population (1,200 – 2,000 individuals) on a cyclical or otherwise regular basis or ≥ 10% during periods of environmental stress. **Therefore, the Lesser Kestrel does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	No

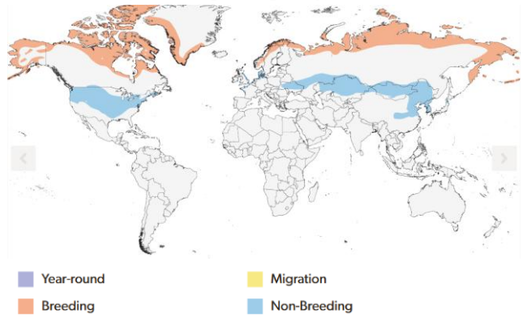
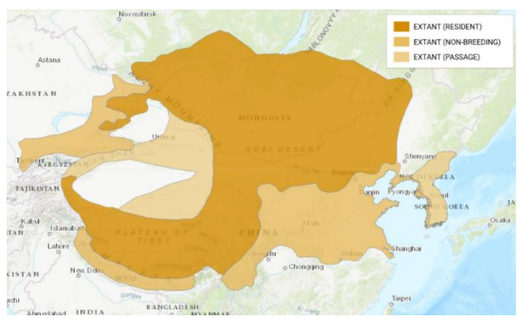
[71] Gombobaatar, S. and Monks, E.M. (compilers), Seidler, R., Sumiya, D., Tseveenmyadag, N., Bayarkhuu, S., Baillie, J. E. M., Boldbaatar, Sh., Uuganbayar, Ch. (editors) (2011). Regional Red List Series Vol 7. Birds. Zoological Society of London, National University of Mongolia and Mongolian Ornithological Society.
[72] BirdLife International. 2021. Falco naumanni. The IUCN Red List of Threatened Species 2021: e.T22696357A205768513. https://dx.doi.org/10.2305/IUCN.UK.2021-3.RLTS.T22696357A205768513.en.

No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
13	*Falco amurensis* Amur Falcon	LC	LC	C	-	-	✓	The Amur Falcon is a migratory species that breeds in eastern Russia, Mongolia and northeast China and winters in southern China, South Asia, and Sub-Saharan Africa. It has an estimated EOO of 3,450,000 km^2 and a global population size of 300,000 – 1 million individuals (or 200,000 – 667,000 mature individuals). This species is a breeding visitor in Mongolia, arriving in May and departing for its wintering grounds in September. In its breeding range, Amur Falcons nest in willow, pine, larch, poplar, elm, and birch trees in forest, forest steppe, forested river valleys, and patchy forest in the steppe, and trees in the Gobi Desert. On migration, individuals or groups of 4-30 individuals occur in open steppe areas, lakes, and river valleys. Overgrazing by livestock at breeding sites in Mongolia contribute to habitat degradation (including drought) that affect the availability of prey species as well as recruitment of Siberian Elm (*Ulmus pumila*) stands used for breeding and sheltering. It is also vulnerable to persecution along its migration route (particularly at the key migratory stopover site of Nagaland India), though no hunting has occurred in this area since 2013 due to international conservation efforts.[73] The species is overall assessed as Least Concern on the IUCN and Mongolian Red Lists. Two (2) individuals were recorded over 2 observations during the September 2024 baseline surveys in the WTG area. In addition, no records have been reported in the EAAA on online databases such as iNaturalist, eBird and GBIF, though multiple observations have been reported in the vicinity of Khanbogd and Tsogtsol Sume (at least 30-40 km away from the southern end of OHL / Oyu Tolgoi). 	Although two Amur Falcons were recorded during baseline surveys, given the species' very large global population size and widespread distribution, it is considered unlikely that the Project's EAAA sustains ≥ 1% of the global population (at least 3,000 – 10,000 individuals) on a cyclical or otherwise regular basis or ≥ 10% during periods of environmental stress. **Therefore, the Amur Falcon does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	No

[73] BirdLife International (2021). Species factsheet: Amur Falcon Falco amurensis. Downloaded from https://datazone.birdlife.org/species/factsheet/amur-falcon-falco-amurensis

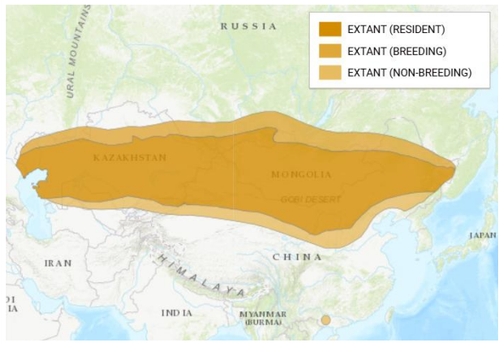
No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
14	*Oenanthe deserti* Desert Wheatear	LC	LC	C	-	-	✓	The Desert Wheatear is a small migratory passerine bird with an extremely large geographic distribution, breeding in Central and Western Asia (including Mongolia) as well as parts of northwestern Africa, and overwintering in North Africa, the Middle East, and Southwest Asia. It has an estimated EOO of 21,400,000 km^2. Though the global population size has not been quantified, it is estimated that the population in Europe (which makes up less than 5% of the species' global range) is approximately 220 – 2,200, therefore it is possible that the global population size is 44,000 – 440,000 (though this requires confirmation). Its population trend is stable due to lack of evidence of any declines or substantial threats to the species. In Mongolia, this species is a breeding visitor, preferring dry open sandy habitats with scattered bushes, young Saxaul trees, sparsely vegetated areas, and rocks and cliffs with bushes in desert steppe, the Gobi Desert, mountain valleys, and herder camps and settlements in lake and river valleys. On migration, the species traverses open areas of the desert steppe and the Gobi Desert as individuals, pairs, or small groups. Current threats to the species that are not considered sufficiently substantial include habitat loss and degradation due to drought, mining, overgrazing by livestock, and human disturbances.  A total of 147 individuals were recorded over 116 observations during the baseline surveys, including 55 in the TL area and 92 in the WTG area, in August and September 2024 as well as April and May 2025.	Though the Desert Wheatear was recorded in large numbers during the baseline surveys, in terms of area, the EAAA is negligible (<0.02%) compared to the EOO of the species. Moreover, given the species' suspected large and stable global population size and trend, as well as its widespread distribution, it is considered unlikely that the Project's EAAA sustains ≥ 1% of the global population on a cyclical or otherwise regular basis (at least 440 – 4,400 individuals) or ≥ 10% during periods of environmental stress. **Therefore, the Desert Wheatear does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	No
15	*Corvus dauuricus* Daurian Jackdaw	LC	LC	C	-	-	✓	The Daurian Jackdaw is a migratory bird in the crow family that breeds in eastern and southern Mongolia, north and northeast China, and parts of Russia, then overwinters in China and the Korean peninsula. It has an estimated EOO of 5,450,000 km^2. Though the global population size has not been quantified, this species is noted to be locally common. It is estimated that China hosts 10,000 – 100,000 breeding pairs and an additional 50 – 1,000 wintering individuals, while an additional 10,000 – 100,000 breeding pairs are in Russia, and 10,000 pairs are in Korea. Due to its stable population trend and lack of evidence indicating any substantial threats, the Daurian Jackdaw is assessed as Least Concern on the IUCN Red List.[74]  In Mongolia, this species is considered a breeding visitor and partial migrant that typically inhabits old deciduous and mixed forests at the edges of mountain taiga forests, forest steppe, mountain steppe, and river valleys. During autumn migration, the species forms flocks of 200 – 500 birds that traverse open habitats in forest steppe, open steppe, and river valleys. They are not noted to occur in desert or desert steppe habitats.[75]	Though the species was recorded during baseline surveys, in terms of area, the EAAA is negligible (<0.06%) compared to the EOO of the species. Considering the species has a suspected large and stable global population size and trend, as well as its widespread distribution, it is considered unlikely that the Project's EAAA sustains ≥ 1% of the global population (at least 600 – 4,200 individuals based on available national population estimates) on a cyclical or otherwise regular basis or ≥ 10% during periods of environmental stress. **Therefore, the Daurian Jackdaw does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	No

[74] BirdLife International. 2024. Corvus dauuricus. The IUCN Red List of Threatened Species 2024: e.T22705935A263818969. https://dx.doi.org/10.2305/IUCN.UK.2024-2.RLTS.T22705935A263818969.en.
[75] Gombobaatar, S. and Monks, E.M. (compilers), Seidler, R., Sumiya, D., Tseveenmyadag, N., Bayarkhuu, S., Baillie, J. E. M., Boldbaatar, Sh., Uuganbayar, Ch. (editors) (2011). Regional Red List Series Vol 7. Birds. Zoological Society of London, National University of Mongolia and Mongolian Ornithological Society.

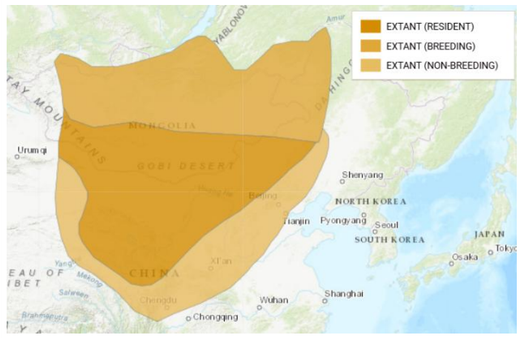
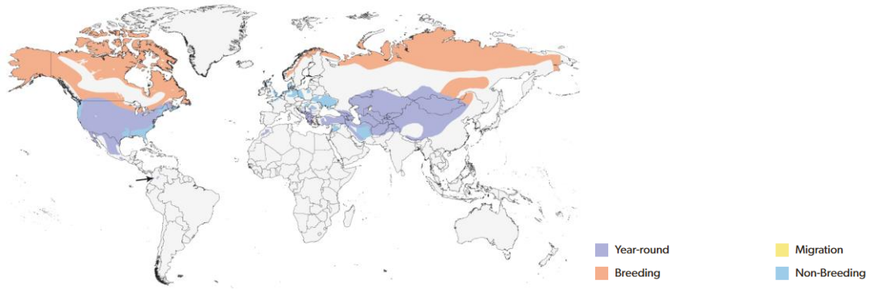
No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
								A total of 50 individuals (2 flocks made up of 25 birds each) were observed during the September 2024 baseline surveys in the TL area.		
16	*Calcarius lapponicus* Lapland Longspur	LC	LC	C	-	-	✓	The Lapland Longspur is an abundant migratory bird species with a breeding range encompassing areas in the Arctic including northern Canada, Alaska, Greenland, and northern Russia, and winters in Central Asia (including Mongolia), northeastern China, and continental United States.[76] It has an estimated EOO of 38,900,000 km^2, an extremely large global population size of approximately 71 – 169 million mature individuals, and a stable, slightly increasing population trend, hence its classification as Least Concern on the IUCN and Mongolian Red Lists.[77] A total of 475 birds were observed over 35 observations during the November 2024 and January 2025 baseline surveys, the majority of which (429 individuals) were recorded in the WTG area. 	Considering the species' extremely large global population size and geographic range, it is considered unlikely that the Project's EAAA sustains ≥ 1% of the global population (at least 710,000 – 1,690,000 individuals) on a cyclical or otherwise regular basis or ≥ 10% during periods of environmental stress. **Therefore, the Lapland Longspur does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	No
17	*Buteo hemilasius* Upland Buzzard	LC	LC	C	-	-	✓	The Upland Buzzard is a migratory bird of prey with a breeding range that includes Mongolia, Russia, the Gobi Desert and the Tibetan Plateau, and a non-breeding range encompassing northern China, the Korean peninsula, Bhutan, Nepal, northern India, western Kazakhstan, and Kyrgyzstan. It has an estimated EOO of 7,990,000 km^2. Its global population size has not been quantified, though it is estimated to exceed 10,000 mature individuals. The species is also noted to be infrequent or rare throughout most of its range. The population trend is suspected to be stable due to lack of evidence of substantial threats, though it may fluctuate based on the availability of prey species (e.g. vole 	Though the species was recorded during baseline surveys, in terms of area, the EAAA is negligible (<0.04%) compared to the EOO of the species. Considering the species' widespread distribution, relatively large population in comparison to the number of individuals recorded in the Project area, stable population trend and absence of evidence indicating any major threats to the species, it is considered unlikely that the Project's EAAA sustains ≥ 1% of the global population (at least 100 individuals) on a cyclical or otherwise regular basis or ≥ 10% during periods of environmental stress. **Therefore, the Upland Buzzard does not meet the thresholds for**	No

[76] Hussell, D. J. T. and R. Montgomerie (2024). Lapland Longspur (Calcarius lapponicus), version 1.1. In Birds of the World (S. M. Billerman, B. K. Keeney, P. G. Rodewald, and T. S. Schulenberg, Editors). Cornell Lab of Ornithology, Ithaca, NY, USA. https://doi.org/10.2173/bow.laplon.01.1

[77] BirdLife International. 2017. Calcarius lapponicus (amended version of 2016 assessment). The IUCN Red List of Threatened Species 2017: e.T22721033A111138693. https://dx.doi.org/10.2305/IUCN.UK.2017-1.RLTS.T22721033A111138693.en.

No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
								populations).[78] The Upland Buzzard is a common resident breeder in Mongolia, typically building nests on natural (cliffs, rocks, ground, trees) and manmade substrates (abandoned buildings, cattle shelters, poles, pylons) in river valleys as well as forest steppe, mountain steppe, and desert steppe habitats. Field studies conducted in Mongolia suggest that Upland Buzzards may utilize artificial nest platforms (e.g. poles and pylons of high-voltage electric lines) at higher rates if the area exhibits higher abundance of prey species.[79] Some threats to this species include habitat loss and degradation, collision and electrocution on transmission lines, and overgrazing of pastureland by livestock. A total of 13 individuals were recorded over 13 observations during the August and September 2024 as well as April and May 2025 surveys, eight of which were observed in the WTG area and five in the TL area.	**Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	
18	*Syrrhaptes paradoxus* Pallas's Sandgrouse	LC	LC	C	-	-	✓	The Pallas's Sandgrouse is a partial migrant that occurs across Central Asia, including Mongolia and Kazakhstan. It typically inhabits flat areas, hilly terrain and mountain valleys across steppe, semi-desert, and Gobi desert habitats with low, sparse vegetation of grasses or shrubs. It is also suspected to favour clay and sandy or stony soils. In Mongolia, this species is a resident breeder that stays in the country year-round. It has an estimated EOO of 8,750,000 km^2.[80] The global population size has not been quantified, though one study in 2005 suggests the population in Mongolia (excluding the Trans-Altai Gobi population) is approximately 3 million.[81] A 2009 study estimated the population in China at 100 – 10,000 breeding pairs and 50 – 1,000 wintering individuals. the population trend suspected to be stable due to absence of any evidence for any declines or major threats, hence the Least Concern classification on the IUCN and Mongolian Red Lists.  A total of 610 birds were observed over 99 observations during every baseline survey event conducted between August 2024 and May 2025, of which the majority were found in the WTG area.	Though the species was recorded in large numbers during baseline surveys, given the species' widespread distribution, its stable population size and trend (at least 3 million birds in Mongolia alone and excluding the Trans-Altai Gobi), and absence of evidence indicating any major threats to the species, it is considered unlikely that the Project's EAAA sustains ≥ 1% of the global population (at least 30,000 individuals) on a cyclical or otherwise regular basis or ≥ 10% during periods of environmental stress. **Therefore, the Pallas's Sandgrouse does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	No

[78] BirdLife International (2021). Species factsheet: Upland Buzzard Buteo hemilasius. Downloaded from https://datazone.birdlife.org/species/factsheet/upland-buzzard-buteo-hemilasius
[79] Gombobaatar, S. and Monks, E.M. (compilers), Seidler, R., Sumiya, D., Tseveenmyadag, N., Bayarkhuu, S., Baillie, J. E. M., Boldbaatar, Sh., Uuganbayar, Ch. (editors) (2011). Regional Red List Series Vol 7. Birds. Zoological Society of London, National University of Mongolia and Mongolian Ornithological Society.
[80] BirdLife International. 2024. *Syrrhaptes paradoxus*. *The IUCN Red List of Threatened Species* 2024: e.T22692980A263662143. https://dx.doi.org/10.2305/IUCN.UK.2024-2.RLTS.T22692980A263662143.en.
[81] Gombobaatar, S. and Monks, E.M. (compilers), Seidler, R., Sumiya, D., Tseveenmyadag, N., Bayarkhuu, S., Baillie, J. E. M., Boldbaatar, Sh., Uuganbayar, Ch. (editors) (2011). Regional Red List Series Vol 7. Birds. Zoological Society of London, National University of Mongolia and Mongolian Ornithological Society.

No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
19	*Melanocorypha mongolica* Mongolian Lark	LC	LC	C	-	-	✓	 The Mongolian Lark is a small migratory bird species with a geographic range from southern Russia to Mongolia and central China and an estimated EOO of 3,840,000 km^2. In Mongolia, the species is a resident breeder that prefers nesting sites in sparsely vegetated, open, dry habitats with patchy tall grass, dry lake and river valleys with tall grasses, and mountain valleys in steppe habitats.[82] It is considered an avian indicator species for Mongolian steppe ecosystems.[83] The global population size has not been quantified, though a 2009 study estimates the population in China at 1,000 – 10,000 migrating birds, 10,000 – 100,000 breeding pairs, and 50 – 10,000 wintering individuals. Due to lack of evidence for any population declines or substantial threats to the species, the population trend of the Mongolian Lark is suspected to be stable, hence the Least Concern classification on the IUCN and Mongolian Red Lists.[84] Therefore, it is also assumed that the current global population is no lower than A total of 233 birds were recorded over 34 observations during all avifauna baseline survey events except for August 2024, with all (except 10 individuals) recorded in the WTG area.	Though the species was recorded in large numbers during baseline surveys, in terms of area, the EAAA is negligible (<0.05%) compared to the EOO of the species. Considering the species' widespread distribution, its stable population trend and absence of evidence indicating any major threats to the species, it is considered unlikely that the Project's EAAA sustains ≥ 1% of the global population (at least) on a cyclical or otherwise regular basis or ≥ 10% during periods of environmental stress. **Therefore, this species does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	No
20	*Eremophila alpestris* Horned Lark	LC	LC	-	-	-	✓	The Horned Lark is a migratory species with an extremely large geographic range distributed across North America, Eurasia, and northern Russia, with an estimated EOO of 45,400,000 km^2 and an estimated global population size of 140 million individuals.[85] In Mongolia, this species is a resident breeder that inhabits a wide range of habitats including open areas in high mountains (such as sub-alpine meadows and rocky mountains), plains, forest steppe, desert steppe, mountain valleys, rivers, and lakes. A total of 14,215 Horned Larks were recorded over 2,316 observations during all survey months between August 2024 and May 2025. 	Though the species was recorded in very large numbers during baseline surveys, in terms of area, the EAAA is negligible (<0.006%) compared to the EOO of the species. Considering the species' extremely large global population size (140 million individuals) and range, it is considered unlikely that the Project's EAAA sustains ≥ 1% of the global population (at least 1.4 million individuals) on a cyclical or otherwise regular basis or ≥ 10% during periods of environmental stress. **Therefore, this species does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	No

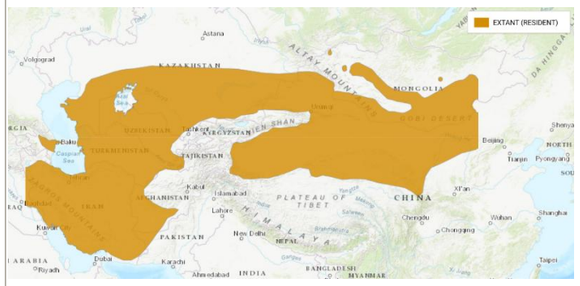
[82] Ibid.
[83] Han, Zheng & Yang, Xi & Zhao, Xueqi & Tryjanowski, Piotr & Wang, Haitao. 2023. Mongolian Lark as an indicator of taxonomic, functional and phylogenetic diversity of steppe birds. Avian Research. 14. 100124. 10.1016/j.avrs.2023.100124.
[84] BirdLife International (2024). Species factsheet: Mongolian Lark Melanocorypha mongolica. Downloaded from https://datazone.birdlife.org/species/factsheet/mongolian-lark-melanocorypha-mongolica
[85] BirdLife International. 2019. Eremophila alpestris. The IUCN Red List of Threatened Species 2019: e.T22717434A137693170. https://dx.doi.org/10.2305/IUCN.UK.2019-3.RLTS.T22717434A137693170.en.

No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
21	*Ficedula albicilla* Red-throated Flycatcher	LC	LC	-	-	-	✓	 The Red-throated Flycatcher is a migratory species that breeds in northern Eurasia and Russia, and winters in South and Southeast Asia. It is a resident breeder in Mongolia, typically inhabiting forests, plantations, and rural gardens and building nests near 14,400,000 km^2. The global population size has not been quantified, though its population trend is suspected to be declining due to the species' medium dependency on forest habitats and given the rate of tree cover loss across its breeding and non-breeding ranges.[86] Nevertheless, it is assessed as Least Concern on the IUCN Red List as its global population size is expected to exceed 10,000 mature individuals and due to its extremely widespread geographic distribution. A total of 13 individuals were recorded over 10 observations during the August 2024 and May 2025 baseline surveys, and they were not recorded during the other four survey months.	Though the species was recorded during baseline surveys, in terms of area, the EAAA is negligible (<0.02%) compared to the EOO of the Red-throated Flycatcher. In addition, only 13 individuals were observed in the Project area during the baseline surveys. Considering the species' relatively low numbers recorded from surveys, widespread distribution, slow rate of population decline, absence of substantial threats—hence its classification as Least Concern on both the IUCN and Mongolian Red Lists—it is considered unlikely that the Project's EAAA sustains ≥ 1% of the global population (at least 30,000 individuals) on a cyclical or otherwise regular basis or ≥ 10% during periods of environmental stress. **Therefore, this species does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	No

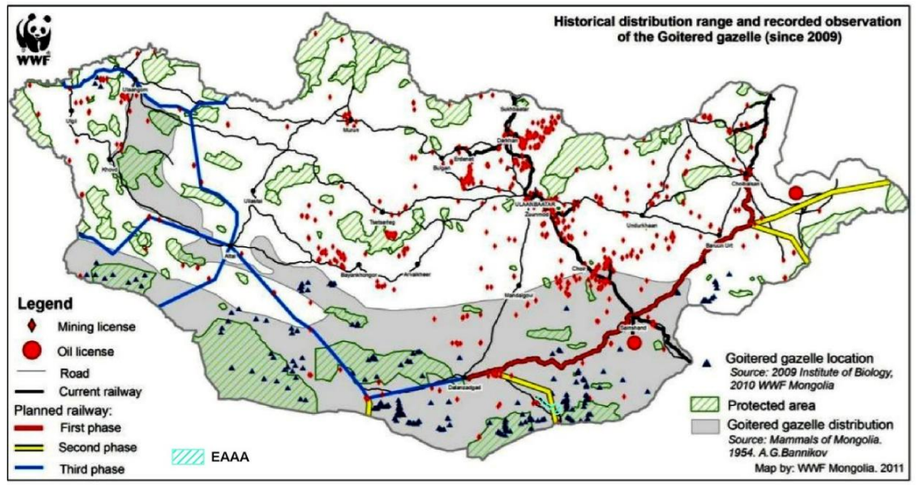
[86] BirdLife International (2024). Species factsheet: Red-throated Flycatcher Ficedula albicilla. Downloaded from https://datazone.birdlife.org/species/factsheet/red-throated-flycatcher-ficedula-albicilla

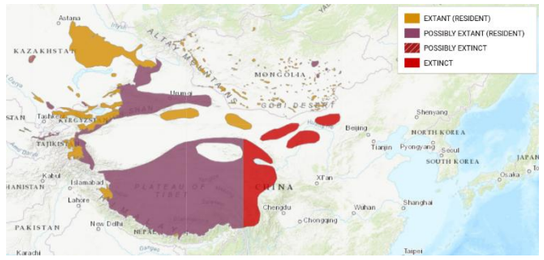
TABLE B-7-2: CRITICAL HABITAT ASSESSMENT OF MAMMAL SPECIES

Abbreviations: CR – Critically Endangered, EN – Endangered, VU – Vulnerable, NT – Near Threatened, LC – Least Concern Very Rare – VR, Rare – R, EOO – Extent of Occurrence, AOO – Area of Occupancy.

No	***Scientific Name*** **Common Name**	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
1	Goitered Gazelle *Gazella subgutturosa*	VU	VU	R	✓	-	✓	The Goitered Gazelle is a nomadic migratory species listed as VU under IUCN Global Red List and the Mongolian Red List. This species inhabits a wide range of desert, desert steppe, and semi-desert habitats in arid regions of Central Asia, and up to elevations of 2,700 m in Mongolia. Suitable habitats include the Gobi and low desert mountain foothills, rolling hills, mountainous valleys, around marshy depressions and ponds, and flat plains.[87] Such habitats are spread across the Project's EAAA. Goitered Gazelles also make seasonal movements in search of pasture and, in northern parts of its range, to avoid areas of heavy snow in winter.  The species has a widespread geographic distribution from Mongolia and northwest China to Central Asia (Kazakhstan, Turkmenistan, Uzbekistan, and marginally in Tajikistan and Kyrgyzstan) and West Asia including Iran, Afghanistan and Pakistan, and the south Caucasus. The Goitered Gazelle remains widespread in Mongolia, the Tarim Basin region of Xinjiang, China, and parts of Kazakhstan, with a substantial proportion of the known global population in Mongolia. However, heavy poaching has extirpated almost all the large herds and reduced the Mongolian population by over 50%. Overall, major threats such as hunting and poaching, competition with livestock, habitat fragmentation and barrier effects due to linear infrastructure and fences, and habitat degradation from overgrazing and land conversion (for agricultural, industrial, and commercial development) have contracted the species' historic distribution and have contributed to an estimated population decline of over 30% in the past 14 years (three generations).[88] The global population of the species was estimated to be 120,000 - 140,000 in 2001, but populations throughout the range have decreased since then.[89] The present global population is estimated to be made up of 42,000 to 49,000 mature individuals[90]. Within Mongolia the species is mostly distributed in the provinces of Dornogobi, as well as Omnogobi where the EAAA is located, according to the WWF (see figure below). A survey carried out between 2012 and 2015 in Dornogobi and Omnogobi (98,216 km^2) indicates that the population of the species in that area fluctuates between 1,140-1,058 individuals, which is considered to be the single largest population of Goitered Gazelles.[91] The same study	Considering the Goitered Gazelle is a migratory species listed as VU on the IUCN Red List, it is assessed against CH Criterion 1(b) and Criterion 3. Project-related activities may result in temporary local displacement, but it is not expected to cause a significant decline in the local population of Goitered Gazelles, such that it could cause the species' global IUCN status to be upgraded to Endangered or Critically Endangered. **Therefore, the Goitered Gazelle does not meet the thresholds for Critical Habitat under PS6 Criterion 1 and ESR6 Criterion 2.** To meet Criterion 3(a), the Project's EAAA must sustain ⩾ 1% of the global population, or at least 420 – 490 individuals. Multiple population density estimates for the Goitered Gazelle in the Eastern Gobi are available based on a study conducted in 2017, as well as the Oyu Tolgoi (OT) mine monitoring surveys from 2022 and 2024. The latest 2024 population estimate of 0.31 to 2.37 individual/km^2, derived from the Oyu Tolgoi mine's 2024 monitoring report, is used to calculate the number of individuals that could occur in the 3,021 km^2 EAAA, which equates to 937 – 7,160 individuals. However, it is unlikely that these population estimates apply to the EAAA as density variations depend on seasonal conditions, extent of anthropogenic disturbances, as well as availability of food and water. Furthermore, only 51 individuals were observed in the Project area in total (even before considering resident foraging individuals/herds that may have been double counted across different survey months). Similarly, while a total of 558 and 767 individuals have been recorded in the OT mine area in 2022 and 2024 (respectively), observed individuals per month do not exceed approximately 150 individuals during peak months	No

[87] B. Lkhagvasuren, B. Chimeddorj, D. Sanjmyatav. 2011. Barrier to Migration: Case Study Mongolia. Analysing the Effects of Infrastructure on Migratory Terrestrial Mammal in Mongolia. CMS. UNEP. Available at: https://www.cms.int/sites/default/files/publication/Inf_23_Migration_Barriers_WWF_Mongolia_E.pdf
[88] IUCN SSC Antelope Specialist Group. 2017. Gazella subgutturosa. The IUCN Red List of Threatened Species 2017: e.T8976A50187422. https://dx.doi.org/10.2305/IUCN.UK.2017-2.RLTS.T8976A50187422.en.
[89] Mallon, D.P. and Kingswood, S.C. 2001. *Antelopes. Part 4: North Africa, the Middle East, and Asia. Global Survey and Regional Action Plans*. IUCN, Gland, Switzerland.
[90] IUCN SSC Antelope Specialist Group. 2017. Gazella subgutturosa. The IUCN Red List of Threatened Species 2017: e.T8976A50187422. https://dx.doi.org/10.2305/IUCN.UK.2017-2.RLTS.T8976A50187422.en.
[91] B. Buuveibaatar, S. Strindberg, P. Kaczensky, J. Payne, B. Chimeddorj, G. Naranbaatar, S. Amarsaikhan, B. Dashnyam, T. Munkhzul, T. Purevsuren, D.A. Hosack and T. K. Kuller. 2017. Mongolian Gobi supports the world's largest population of Kulan (*Equus hemionus*) and Goitered gazelles (*Gazella subgutturosa*).

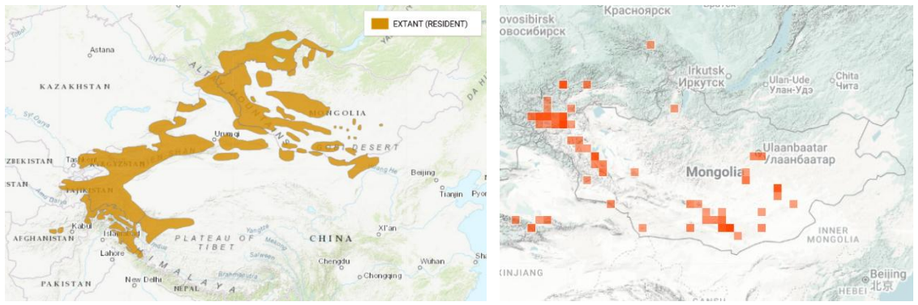
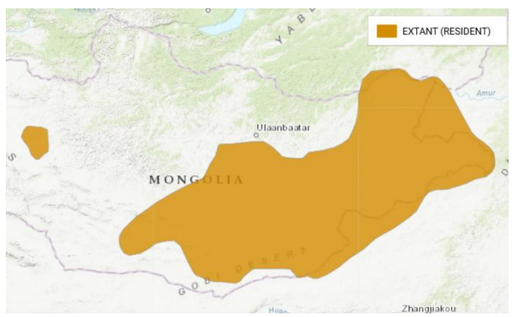
No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
								estimated population density (individual/km^2) (95% confidence interval) to vary between 0.5 (Autumn 2012) to 0.36 (Spring 2013).  *Map 6. Distribution and point locations of the Goitered gazelle after 2009.* Wildlife monitoring surveys conducted for the Oyu Tolgoi mine project (which overlaps with the EAAA) found in the mine compound a total of 558 individuals belonging to 97 herds in January – October 2022, and 767 individuals belonging to 184 herds in January – October 2024. In 2022, the number of individuals in a herd ranged from 1 to 39, with an average of 5.7 ± 0.6 gazelles per herd. Of the total observed herds 63.9% consisted of 1-5 individuals, 24.7% were herds of 6-10 individuals, and the remaining were herds of 11-33 individuals. The month during which the highest number of individuals were recorded is January 2022 with approximately 155 Goitered Gazelles. In 2024, the number of individuals in a herd ranged from 1 to 14, with an average of 4.3 ± 0.6 individuals per herd. Of the herds observed in 2024, 79% consisted of 1-5 individuals, 10% were herds of 6-10 individuals, and 11% consisted of 11-18 individuals. The highest number of gazelles seen in a single month were observed in January with 125 individuals, while the summer months showed the lowest occurrences. For both the 2022 and 2024 periods, information is not available on the average/ maximum number of individuals seen per observation. Density reported in the Oyu Tolgoi mine reports ranged from 0.23 individuals/km^2 in August 2022 to 2.46 individuals/km^2 in January 2022, as well as 0.31 (August 2024) to 2.37 (February 2024) individuals/km^2. These results align with the ESIA baseline surveys, which found higher density of individuals in January during the winter season than in August (autumn). However, the results differ in the summer months, where areas around Oyu Tolgoi mine show the lowest occurrences while the highest number of individuals recorded during surveys were observed in May 2025. As specific records of number of individuals/herds observed in each month are not well-documented in the Oyu Tolgoi mine reports due to	(January and February), therefore it is unlikely that the total observed individuals equate to the actual number of unique individuals in the local population. Overall, it is considered unlikely that the Project's EAAA sustains ⩾ 1% of the global population on a cyclical or otherwise regular basis. **Therefore, the Goitered Gazelle does not meet the thresholds for Critical Habitat under PS6 Criterion 3(a) and ESR6 Criterion 4(a).**	

No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
								absence or inconsistency, these have not been included here (other than information already presented). Satellite tracking studies conducted by the Oyu Tolgoi Mine project also tagged 58 Goitered Gazelles in 2014, 2018 and 2020. Location data for 17 of the tagged Goitered Gazelles between September 2021 and September 2022 found that these individuals migrated over an area ranging from 206 km^2 to 13,196 km^2, with an average of 1,887.5 ± 759 km^2, depending on food, water, and seasonal conditions. Location data for 16 tagged Goitered Gazelles between September 2022 and September 2023 found migration distances ranging from 210 km^2 to 23,763 km^2 of territory, with an average of 3,573 km^2.[92] During the Project's baseline surveys, a total of 51 individuals were recorded over 14 observations during the August 2024, January 2025 and May 2025 survey periods, with an average of 5.25 individuals per observation. The highest number of individuals were observed during in May (35 records) and January (10 records).		
2	*Ovis ammon* Argali	NT	R	EN	✓	-	✓	Argali is a species of wild sheep that is considered a migratory species under CMS Appendix II.[93] This species is found in Mongolia, northern China, the Altai Mountains in Russia, eastern Kazakhstan, eastern Kyrgyzstan, easter Uzbekistan, eastern Tajikistan, northern Nepal, northern India, and northeastern Afghanistan. The species' EOO is 11,825,000 km^2 while the AOO has not been quantified. The global population is estimated at 107,000 according to the CMS in 2014, but the IUCN Red List Assessment suspects the figure is substantially lower.[94]  Argali inhabit areas with rolling hills, mountains, steppe valleys, rocky outcrops, canyons, plateaus, and open desert habitats in large parts of Central Asia. In Mongolia, Argali (including subspecies *O. a. ammon* and *O. a. dawrini*) are distributed widely but patchily across a large portion of Mongolia. Large areas formerly occupied by argali in western Mongolia now lack the species. The species' current distribution includes portions of the Altai, Trans-Alai, Gobi-Altai, Khangai, Khentie, and Khovsgol Mountain ranges, as well as isolated areas in the Gobi Desert. More specifically, isolated populations exist in the mountains of the Mongolian Altai and Gobi Altai Mountains, primarily the western and southern Khangai Mountains. Other populations persist patchily in the Dzungarian Gobi, Great Gobi, Trans-Altai Gobi, Alashan Gobi, Middle Gobi, and eastern Gobi. Argali are gregarious and live in groups from 2-150 individuals.[95] In the Gobi steppe of Mongolia, Argali occupancy was shown to increase proportionally to the availability of nearby water sources as well as the amount of rocky outcrops in an area.[96]	Argali is a migratory species assessed as Endangered on the Mongolian Red List, therefore it is assessed against CH Criterion 1(c) and Criterion 3. Given an estimated population of 17,903 Argali in Mongolia, while no individuals were directly observed during the six baseline surveys and the numbers reported by interviewed local herders likely does not exceed a maximum estimate of 44 Argali in the Project area. Based on the population density of 0.0187 animals per km^2 estimated by Reading *et. al* (2020), a total of 57 individuals could occur in the EAAA of 3,021 km^2, which accounts for 0.32% of the Mongolian population and is therefore not considered to constitute an important concentration of the species. Furthermore, the species has a very widespread global and national distribution range. Even if the species is present in the Project area, the EAAA is considered unlikely to contain important concentrations of this EN-listed species. **Therefore, the Argali does not meet the thresholds for Critical Habitat under PS6 Criterion 1 or ESR6 Criterion 2.** Similarly, due to the absence of direct observations during baseline surveys and the species' low occurrence and	No

[92] 2022 and 2024 Environmental Management Plan Implementation Report for Oyu Tolgoi Copper-Gold Mining Project located in Khanbogd Soum, Umnogovi Province. 2022 Report available at: https://admin.ot.mn/wp-content/uploads/AER_2022.pdf. 2024 Report made available through communication with Oyu Tolgoi Mine and facilitated by the Client.
[93] Appendices I and II of the Convention on the Conservation of Migratory Species of Wild Animals (CMS) Effective 22nd May,2020. https://www.cms.int/sites/default/files/basic_page_documents/appendices_cop13_e_0.pdf
[94] Reading, R., Michel, S. & Amgalanbaatar, S. 2020. Ovis ammon. The IUCN Red List of Threatened Species 2020: e.T15733A22146397. https://dx.doi.org/10.2305/IUCN.UK.2020-2.RLTS.T15733A22146397.en.
[95] Ibid.
[96] Murdoch, J., Reading, R., Amgalanbaatar, S., Winigard, G., and Lkhagvasuren, B. 2017. Ecological interactions shape the distribution of a cultural ecosystem service: Argali sheep (*Ovis ammon*) in the Gobi-Steppe of Mongolia. Biological Conservation (209):315-322.

No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
								Country-wide surveys carried out by the Mongolian Academy of Sciences estimated the national population to range around 17,903 in 2009, while another study in 2009 produced an estimate of 26,155 individuals. The Mongolian Academy Sciences' study in 2001 further estimated that 10,000 – 12,000 Argali inhabited the Gobi Region of Mongolia, while 3,000 – 5,000 Argali inhabited the Altai Region (northwestern Mongolia). Population density was estimated as part of a 2009 study of Argali populations in Dundgobi, Omnogobi, and Dornogobi provinces of the South Gobi region, which found 0.0187 animals per km^2 (± 0.0054 standard error).[97] Based on available regional distribution data, it does appear that Argali continue to decline in western and central Mongolia, while populations in eastern Mongolia appear to be expanding. Argali populations in southern Mongolia (such as southeast Gobi region) appear to be relatively stable.[98] Major threats to this species include poaching for meat and horn trade (used in traditional Chinese medicine), competition and displacement by livestock (and possibly disease transmission), and habitat loss and fragmentation from anthropogenic disturbances (e.g. mining, linear infrastructure developments and international border fences). No individuals were recorded from the August 2024 – May 2025 baseline surveys, but interviews conducted with local herders indicate that groups of 3 to 11 individuals were observed at four separate locations in the Zogdor Mountains within the WTG area. It is likely that Argali seasonally migrate across areas between mountain ranges present within the Project's WTG area. One observation of the species is recorded on GBIF near Nomgon and Bayan-Ovoo, around 70 km from the EAAA at the closes point.[99]	abundance in the Project area, it is considered unlikely that the Project's EAAA sustains ≥ 1% of the global population (at least 1,070 individuals) on a cyclical or otherwise regular basis or ≥ 10% during periods of environmental stress. **Therefore, this species does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	
3	*Capra sibirica* Siberian Ibex	NT	R	NT				The Siberian Ibex is an ungulate species that inhabits the mountainous regions of Central Asia, including Mongolia (Altai, Gobi-Altai, Khangai, and Sayan Mountains), northwestern China, and southern Russia. It inhabits mountain ranges, isolated mountains, open alpine meadows, crags, and rocky outcrops from 500 m to 5,500 m above sea level. As an altitudinal migrant, it moves toward lower elevations during winter descending to lower valley bottoms toward more vegetated areas. They occur in steep habitats in a range of environment including deserts, low mountains and foothills, and high mountain ridges. The Siberian Ibex is primarily a grazer, with herbs, sub-shrubs and shrubs such as *Eurotia spp*., *Rosa spp.*, and *Ephera spp.* making up a significant portion of its diet. In Mongolia, it is noted to occur in patches across rugged terrain throughout the western part of the country, with the largest national population being found in the Altai and western Khangai mountains. They also occur in scattered populations in the small mountains in the Trans-Altai Gobi and in canyons, rocky outcrops, and other rugged terrain throughout the Gobi Desert.[100, 101] The global population size is estimated at 170,000 – 250,000 individuals (or 102,000 – 150,000 mature individuals).[102] Lkhagvasuren *et al.* (2016) estimated a total of 36,018	As the Siberian Ibex is considered an altitudinal migrant, it is assessed against CH Criterion 3. The species has not been recorded in any of the six baseline surveys nor observed by any local herders who were interviewed throughout the survey period, therefore its occurrence in the Project area has not been confirmed. Moreover, the species typically prefers rugged, rocky terrain including mountains, canyons, and rocky outcrops, while the largest subpopulation within Mongolia occurs in the western Khangai and Altai mountains more than 650 and 1,400 km from the Project site, respectively. Therefore, it is considered highly unlikely that the Project's EAAA sustains ≥ 1% of the global population (at least 1,700 – 2,500 individuals) on a cyclical or otherwise regular basis or ≥ 10% during periods of environmental stress.	No

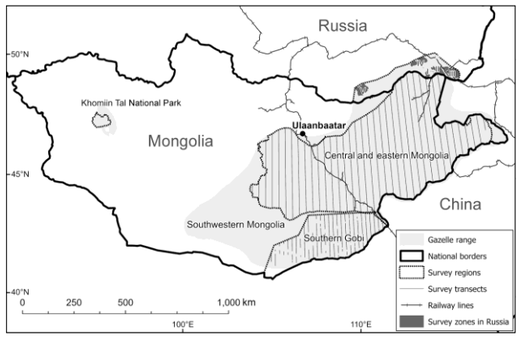
[97] Reading, R., Amgalanbaatar, S., Mix, H., and Lhagvasuren, B. 2009. Argalis *Ovis ammon* surveys in Mongolia's South Gobi. Oryx 31(4): 285-294. doi:10.1046/j.1365-3008.1997.d01-17.x
[98] Ibid.
[99] Global Biodiversity Information Faciliy. 2025. Recorded Occurrences of the Argali (*Ovis ammon).* Available at: https://www.gbif.org/occurrence/map?country=MN&has_coordinate=true&has_geospatial_issue=false&taxon_key=2441122&geometry=POLYGON((52.02850%2024.31512,133.54635%2024.31512,133.54635%2056.89343,52.02850%2056.89343,52.02850%2024.31512))&occurrence_status=present
[100] Clark, E. L., Munkhbat, J., Dulamtseren, S., Baillie, J. E. M., Batsaikhan, N., Samiya, R. and Stubbe, M. (compilers and editors) (2006). Mongolian Red List of Mammals. Regional Red List Series Vol. 1. Zoological Society of London, London.
[101] Reading, R., Michel, S., Suryawanshi, K. & Bhatnagar, Y.V. 2020. Capra sibirica. The IUCN Red List of Threatened Species 2020: e.T42398A22148720. https://dx.doi.org/10.2305/IUCN.UK.2020-2.RLTS.T42398A22148720.en.
[102] Ibid.

No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
								(13,840–43,873) animals across Mongolia, compared to 80,000 estimated in the mid-1980s.[103] Tumursukh *et al.* (2016) estimate a density of 0.75 ibex/km² or 1,051 (±196) in 1,400 km² of the Tost Mountains of South Gobi, which were later declared Tost-Tosumbumba Nature Reserve.[104] Few other rigorously derived estimates of population numbers exist for other parts of Mongolia. The Siberian Ibex is assessed as Near Threatened on the IUCN Red List due to sustained population decline that may approach a 30% population reduction over three generations, as well as low densities reported in most areas across its range. However, most data available on this species are likely lacking in reliability and area coverage. Major threats to this species include habitat loss, fragmentation and degradation, climate change-related impacts (including effects on water availability, as well as vegetation composition and phenology), land conversion, mining and other industrial activities, hunting for subsistence use, poaching and trophy hunting, overgrazing, and competition with livestock for food and habitat.[105] No individuals were recorded from the August 2024 – May 2025 baseline surveys and interviewed local herders had also not observed any within the study area. Two occurrences were reported on the iNaturalist database in Khanbogd (approximately 30 km from the EAAA) in July 2019 and May 2021.  Global distribution range from IUCN Red List (left) and occurrence map on iNaturalist (right)	**Therefore, the Siberian Ibex does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	
4	*Procapra gutturosa* Mongolian Gazelle	LC	EN	-	✓	-	✓	 The Mongolian Gazelle is a nomadic and congregatory ungulate species that occurs in eastern Mongolia and adjacent areas of Russia and north-eastern China. Populations have become fragmented in central and southern	Considering the Mongolian Gazelle is a migratory/ congregatory species listed as EN on the Mongolian Red List, it is assessed against CH Criterion 1(c) and Criterion 3. The number of Mongolian Gazelles and population density in the southern Gobi is substantially lower than that of central and eastern Mongolia, with 40,899 individuals (compared to 1,991,300 individuals) and 0.52	No

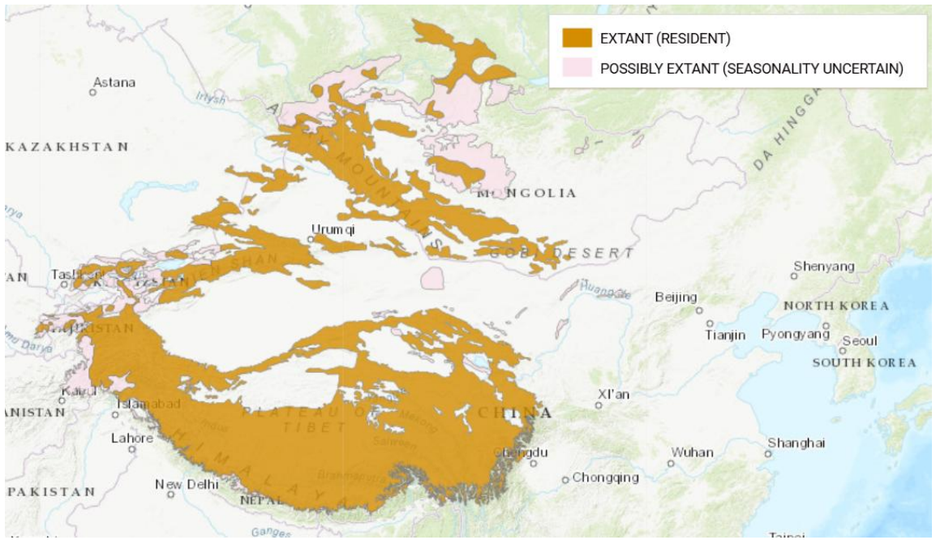
[103] Lkhagvasuren, B., Adiya, Y., Tsogtjargal, G., Amgalanbaatar, G., and Harris, R. 2016. Current Status and Conservation of Mountain Ungulates in Mongolia. Erforsch. Biol. Ress. Mongolei (Halle/Saale) 2016(13): 445-456.
[104] Tumursukh, L., Suryawanshi, K.R., Mishra, C., McCarthy, T.M., and Boldgiv, B. 2016. Status of the mountain ungulate prey of the endangered snow leopard Panthera uncia in the Tost Local Protected Area, South Gobi, Mongolia. Oryx 50(2): 214-219.
[105] Ibid.

No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
								Mongolia[106]. The species is highly nomadic[107] and is often absent from areas for extended periods of time, giving the false impression that its range is expanding or contracting. It is also listed under CMS Appendix II.[108] Preferred habitats for the Mongolian Gazelle consist of rolling plains, steppe or semi-desert. It is known to avoid irregular terrain and narrow valleys. It commonly forages on vegetation characteristic of steppe ecosystems such as *Stipa* sp*., Allium* spp. and *Artemisia* spp.[109] Suitable habitat types and vegetation species (e.g. *Allium mongolica, Stipa gobica* and *Artemisia frigida*) are present in the EAAA and recorded during the baseline surveys. The Mongolian Gazelle is listed as endangered on the Mongolian Red List due to estimated population declines of greater than 50% between 1996 and 2011, and that the species now occurs in less than a quarter of its mid-20th century range. The Mongolian population is believed to be declining primarily due to hunting and poaching, habitat loss, degradation and fragmentation (e.g. overgrazing, industrial activities, infrastructure development), competition for resources with livestock, and anthropogenic disturbances. The latest IUCN Red List assessment for the Mongolian Gazelle conducted in July 2016 estimates the current global population at 500,000 to 1,500,000 mature individuals , though population estimates over the last 10 years have ranged from 400,000 to 2,700,000.[110] Several recent authorities agree on a figure of approximately 1,000,000 in Mongolia, with most of the population occurring in the eastern Mongolian steppes while smaller populations are found in central and western Mongolia.[111, 112]	individuals/km^2 (compared to 4.72 individuals/km^2).[114] The southern Gobi population only accounts for 1.9% of the total population in Mongolia, of which the EAAA accounts for an even smaller fraction, evident from the low number of gazelles observed (220 individuals) in the Project area during the baseline surveys relative to the region. Based on this, it is considered unlikely that the Project's EAAA supports important concentrations of this species. **Therefore, the Mongolian Gazelle does not meet the thresholds for Critical Habitat under PS6 Criterion 1 and ESR6 Criterion 2.** Similarly, it is considered unlikely that the Project's EAAA sustains ≥ 1% of the global population of 2.17 million individuals (at least 21,700 individuals) on a cyclical or otherwise regular basis or ≥ 10% during periods of environmental stress. **Therefore, the Mongolian Gazelle does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	

[106] Lkhagvasuren, B., Dulamtseren, S. and Amgalan, L. (2001). Mongolia. In: D.P. Mallon and S.C. Kingswood (eds.) Antelopes. Part 4: North Africa, the Middle East and Asia. Global Survey and Regional Action Plans. IUCN/SSC Antelope Specialist Group. IUCN, Gland and Cambridge. pp. 159-167.
[107] Dulamtseren, S., Tsendjav, D. and Avirmed, D. (1989). Mammals of Mongolia. Publishing House of the Mongolian Academy of Sciences, Ulaanbaatar. 160 pp. (In Mongolian)
[108] Appendices I and II of the Convention on the Conservation of Migratory Species of Wild Animals (CMS) Effective 22nd May,2020. https://www.cms.int/sites/default/files/basic_page_documents/appendices_cop13_e_0.pdf
[109] IUCN SSC Antelope Specialist Group. 2016. *Procapra gutturosa* (errata version published in 2017). *The IUCN Red List of Threatened Species* 2016: e.T18232A115142812. https://dx.doi.org/10.2305/IUCN.UK.2016-3.RLTS.T18232A50193126.en.
[110] IUCN SSC Antelope Specialist Group. 2016. *Procapra gutturosa* (errata version published in 2017). *The IUCN Red List of Threatened Species* 2016: e.T18232A115142812. https://dx.doi.org/10.2305/IUCN.UK.2016-3.RLTS.T18232A50193126.en. Accessed on 19 November 2025.
[111] Zahler, P., Lkhagvasuren, B., Reading, R.P., Wingard, G.J., Amgalanbaatar, S., Gombobaatar, S., Barton, N. and Onon, Yo. 2004. Illegal and Unsustainable Wildlife Hunting and Trade in Mongolia. Mongolian Journal of Biological Sciences 2(1): 23-31
[112] Olson, K.A., Fuller, T.K., Schaller, G.B., Odonkhuu, D. and Murray, M.G. 2005. Estimating the population density of Mongolian gazelles Procapra gutturosa by driving long-distance transects. Oryx 39(2): 164-169.
[114] Buuveibaatar B, Strindberg S, Ariunbaatar B, et al. Assessment of the global population size of the Mongolian gazelle Procapra gutturosa. Oryx. 2024;58(6):759-768. doi:10.1017/S0030605323001515

No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
								However, Buuveibaatar *et. al* (2024) conducted surveys over an area of 433,245 km^2 across the southern Gobi and central and eastern steppe regions between 2019-2020, which estimated a population of around 2.14 million individuals in Mongolia and 30,000 individuals in Russia.[113] The encounter rate in the central and eastern steppe regions of Mongolia was substantially higher than in the southern Gobi (in which the EAAA is situated), with 0.71 compared to 0.01 groups/km^2, respectively (see figure below for map of regions surveyed).  The total population and density in the southern Gobi were estimated at 40,899 individuals and 0.52 individuals/km^2 (95% confidence interval) in the southern Gobi, compared to an overall population of 1,991,300 individuals and density of 4.72 individuals/km^2 in central and eastern Mongolia. Overall, for the purpose of this assessment, the global population is considered to be at least 2,170,000 individuals. A total of 220 individuals were recorded 9 times during the August, September, November 2024 and May 2025 baseline surveys.		
5	*Panthera uncia* Snow Leopard	VU	EN	VR	✓	-	✓	The Snow Leopard is listed as globally VU on the IUCN Red List, EN on the Mongolian Red List, and Very Rare under the Law on Fauna. Though no robust estimates are available on the species' global population size, the IUCN Red List indicates that the number of mature individuals likely ranges between 2,710 and 3,386 mature individuals (more than 2,500 but less than 10,000 mature individuals). The Snow Leopard's geographic distribution ranges from the Himalayas to the Qinghai-Tibetan Plateau and the mountains of Central Asia and southern Siberia, crossing through 12 countries including Afghanistan, Bhutan, China, India, Kazakhstan, Kyrgyzstan, Mongolia, Nepal, Pakistan, Russia, Tajikistan, and Uzbekistan. The species' EOO is estimated at 6,786,272 km^2, and the AOO has not been quantified.[115] It inhabits mountainous rangelands at elevations of 3,000 m to over 5,000 m above sea level in the Himalayan and Tibetan plateaus, but can occur as low as 500 m in the Altai (western Mongolia); therefore, it is considered an altitudinal migrant.[116] Snow Leopards may occur in relatively flat or rolling areas such as parts of Mongolia, but they prefer steep, rugged and broken terrain and rocky outcrops, mountain ridges, cliff edges, and well-defined drainage lines. Their occurrence also depends on prey availability, which primarily consists of wild caprids (e.g. Siberian Ibex *Capra sibirica* or Argali Sheep *Ovis ammon*), and occasionally small rodents and birds.[117] No individuals were observed during any of the six baseline surveys conducted in the Project area between August 2024 and May 2025, and no records have been reported on citizen science databases iNaturalist and GBIF within the EAAA. Records of the species in Mongolia	The Snow Leopard has a widespread geographic distribution and the Project's EAAA is negligible compared to its EOO (<0.05%). In addition, the EAAA does not provide suitable or preferred habitats for this species, and no individuals have been observed in the Project area during the baseline surveys. Therefore, it is considered unlikely that Project's EAAA supports ≥ 0.5% of the global population (at least 14 to 17 individuals) and ≥ 5 reproductive units. **The Snow Leopard does not meet the thresholds for Critical Habitat under PS6 Criterion 1 and ESR6 Criterion 2.** Similarly, the EAAA is also not considered to sustain ≥ 1% of the global population (on a cyclical or otherwise regular basis) or ≥ 10% during periods of environmental stress. **The Snow Leopard does not meet the thresholds for Critical Habitat under PS6 Criterion 3 and ESR6 Criterion 4.**	No

[113] Buuveibaatar B, Strindberg S, Ariunbaatar B, et al. Assessment of the global population size of the Mongolian gazelle Procapra gutturosa. Oryx. 2024;58(6):759-768. doi:10.1017/S0030605323001515
[115] McCarthy, T., Mallon, D.P., Jackson, R., Zahler, P. & McCarthy, K. 2017. Panthera uncia. The IUCN Red List of Threatened Species 2017: e.T22732A50664030. https://dx.doi.org/10.2305/IUCN.UK.2017-2.RLTS.T22732A50664030.en.
[116] Ibid.
[117] Ibid.

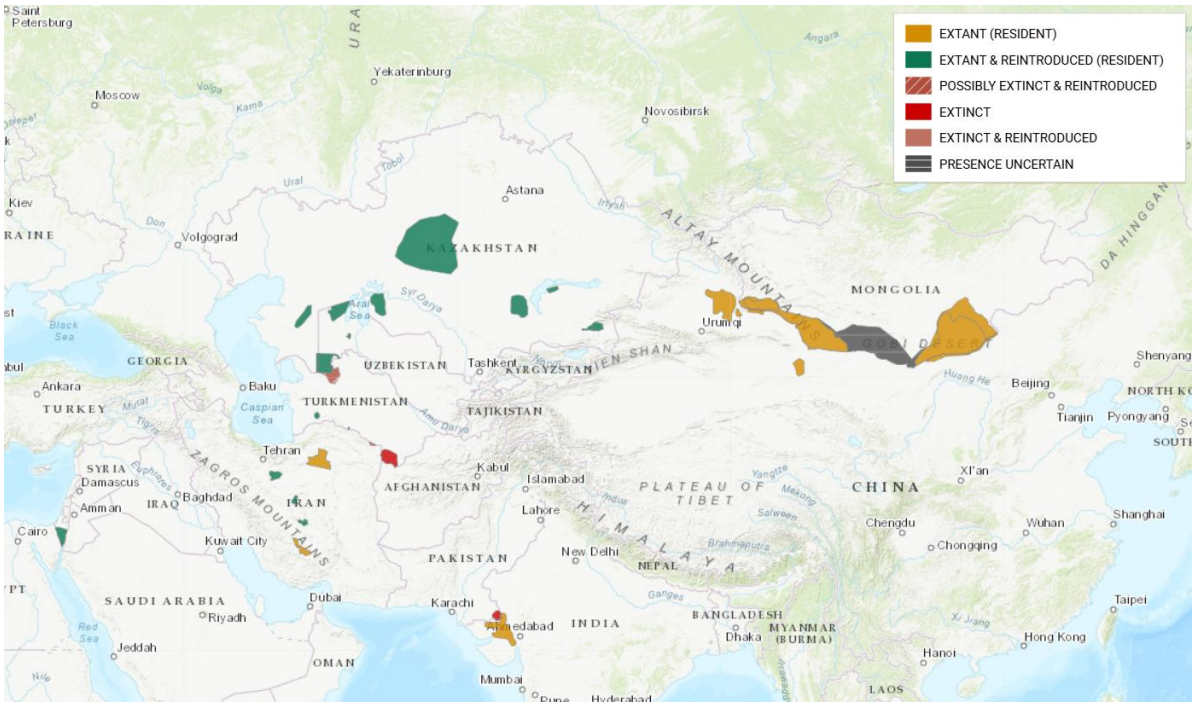
No	*Scientific Name* Common Name	IUCN Red List	Mongolian Red List	National Status	C1	C2	C3	Overall Species Information	CH Rationale	Qualified Species
								are mostly located on mountain ranges and the nearest recorded occurrence is at least 195 km away from the EAAA. The Snow Leopard's preferred prey—Siberian Ibex (*Capra sibirica*) and Argali (*Ovis ammon*)—have also not been observed during the baseline surveys (as mentioned previously).  		

ASIATIC WILD ASS (*EQUUS HEMIONUS*)

Species Information

- CH Criterion: 1(c) and 3
- IUCN Red List: NT
- Mongolian Red List: EN
- National Status (Law on Flora & Mongolian Red Book): Rare
- CITES: Appendices I and II
- CMS: Appendix II

The Asiatic Wild Ass (*Equus hemionus*) is a nomadic ungulate species with a historical distribution range spanning the steppes and desert steppes of the Russian Federation, Mongolia, northern China, northwest India, Central Asia, the Middle East, including Iran, the Arabian Peninsula and Asia Minor. Presently the single largest population of the species belongs to the Mongolian Khulan (*E. h. hemionus*) subpopulation and is spread across desert and semi desert landscape of southern Mongolia and northern China bordering Mongolia. The species' EOO is estimated at 11,262,103 km^2 while the AOO is 257,300 km^2.[118]



Source: IUCN Red List version 2025-2.

FIGURE B7-1: GLOBAL DISTRIBUTION OF THE ASIATIC WILD ASS (*EQUUS HEMIONUS*)

Currently Asiatic Wild Asses are free-roaming in eight countries and estimated to number 108,300 individuals, equating to 65,000 mature individuals. While this population size is greater than in the last assessment, this is more likely related to better data and population surveys rather than a large population increase. Data on population composition and age specific mortality rates are unavailable, and most surveys did not state if and how foals were included in the estimates. Without more robust population dynamics data, the IUCN Red List

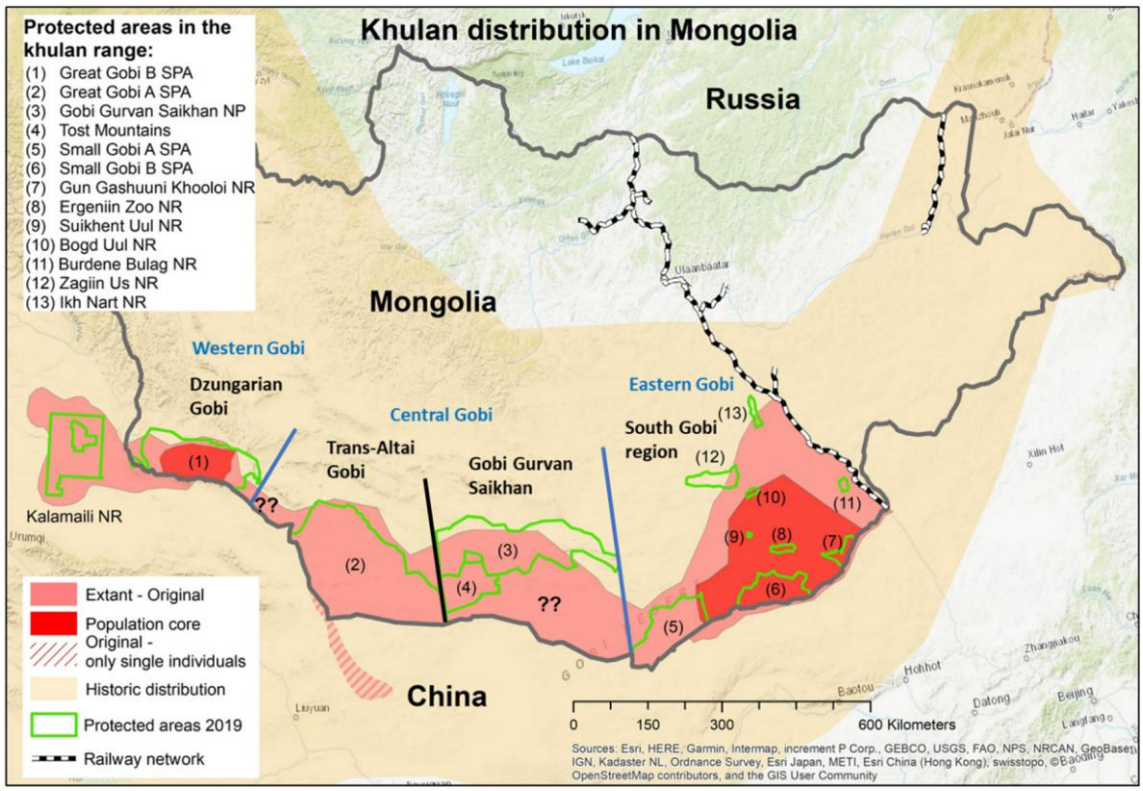
[118] Kaczensky, P., King, S.R.B., Esmaeili, S. & Moehlman, P.D. 2025. Equus hemionus. The IUCN Red List of Threatened Species 2025: e.T7951A238881740. https://dx.doi.org/10.2305/IUCN.UK.2025-1.RLTS.T7951A238881740.en.

assessment for the species estimates that the number of mature individuals roughly equals 60% of the total population, which is in line with the typical wild equid population structure (71-78% adults), as well as those of Przewalski's horses sharing a similar range with the Asiatic Wild Ass in the Gobi region (61% adults). This gives an estimate of about 65,000 mature individuals for the global population of the species.

The species' stronghold is in southern Mongolia, where an estimated 91,000 Asiatic Wild Ass out of 108,300 individuals, or about 84% of the global population, are found. All other remaining populations are much smaller and largely isolated from each other.[119]

In Mongolia, the largest global population of Asiatic Wild Ass is found in the Gobi Desert in the south of the country, with eastward range largely limited by the fenced Trans-Siberian railway and southwards by the fenced international border with China.[120] The Wildlife Conservation Society (WCS) conducted large-scale ground surveys in the South Gobi region for Oyu Tolgoi mine's biodiversity monitoring scheme in 2013, 2014, 2015, 2019, 2021, and 2023, with the most recent survey in 2023 suggesting an increasing population numbering 85,992 (59,758-123,740) Asiatic Wild Asses in the 116,000 km^2 study area. Most recent surveys in the Great Gobi B Strictly Protected Area in 2022 suggest a slightly declining population numbering 5,204 individuals (ranging between 2,121 – 12,771) over the 13,000 km^2 study area. Populations in the Great Gobi A SPA have also reportedly declined, while the species may be largely absent from the area between the Great Gobi A SPA and Small Gobi A SPA in the South Gobi Region. Movements of 100 Asiatic Wild Ass equipped with GPS collars in the South Gobi Region since 2013 have not documented any Asiatic Wild Ass to move to the west beyond Small Gobi A SPA, further indicating that movements between the Transaltai Gobi (where Great Gobi A SPA is located) and the Southeast Gobi Region (where Small Gobi A is located) may be rare (Kaczensky et al. unpubl. data).[121]

[119] Ibid.
[120] Vogler, T., Altansukh, N., Ganbaatar, O., Sukhbaatar, D., Devineau, O. and Kaczensky, P. 2023. Steppe ungulate count in Great Gobi B Strictly Protected area 2022. INN Oppdragsrapport 3-2023.
[121] Kaczensky, P., King, S.R.B., Esmaeili, S. & Moehlman, P.D. 2025. Equus hemionus. The IUCN Red List of Threatened Species 2025: e.T7951A238881740. https://dx.doi.org/10.2305/IUCN.UK.2025-1.RLTS.T7951A238881740.en.

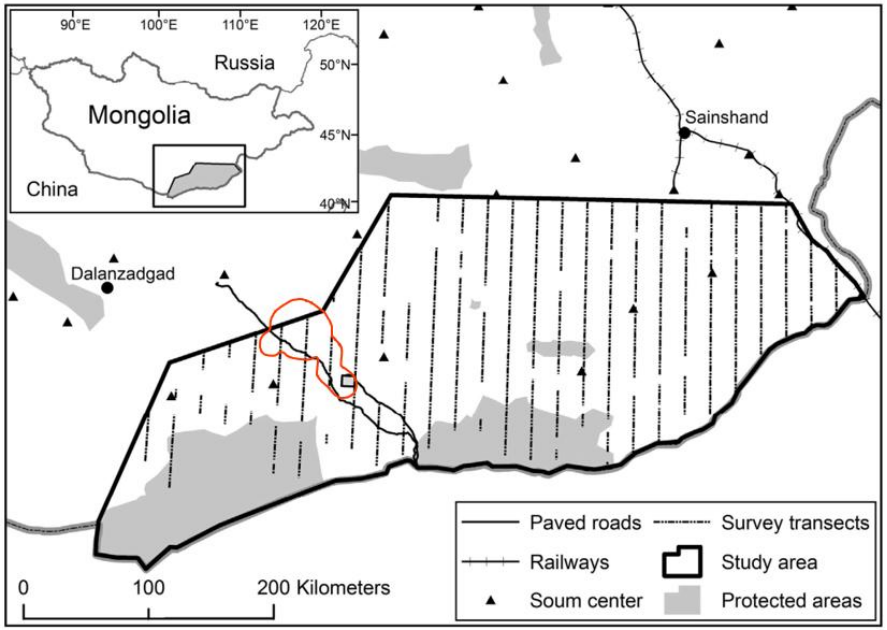


Source: Kaczensky, P. *et. al* (2020)[122]

FIGURE B7-2: MONGOLIAN DISTRIBUTION OF ASIATIC WILD ASS (*EQUUS HEMIONUS*)

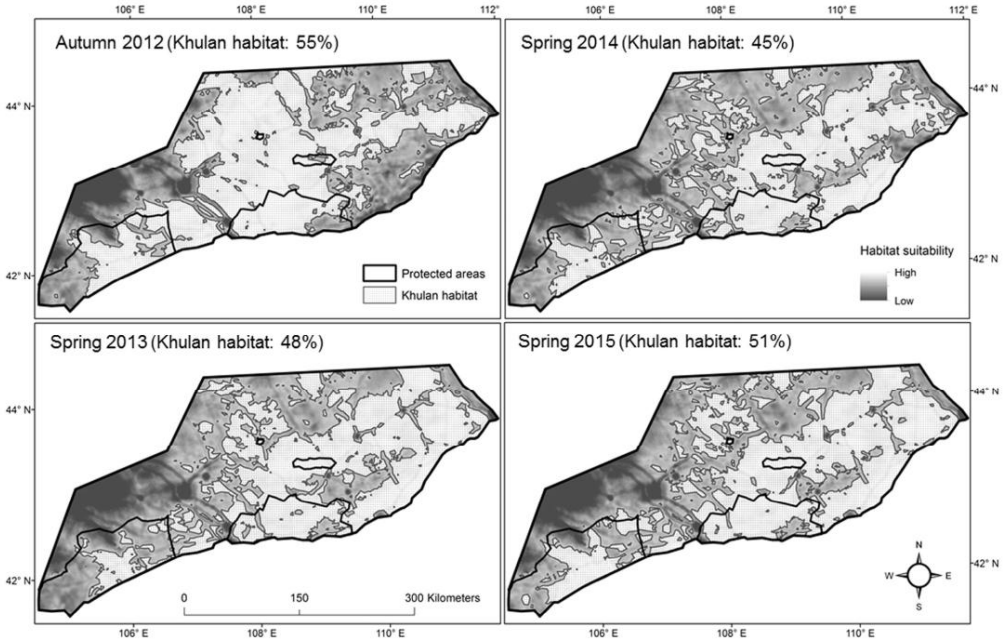
With regards to population density, Bayarbaatar et al. (2017) carried out surveys between 2012 and 2015 (funded by OT Mine's Core Biodiversity Monitoring Project) in Omnogobi and Dornogobi across a study area of 98,216 km^2, which also overlaps with the Project's EAAA.[123] Results of the study indicate that the Asiatic Wild Ass population density was estimated to vary between 0.83 (Autumn 2012) to 0.45 (Spring 2013) individuals per km^2 (95% confidence interval), yielding abundance estimates of 35,899 to 36,298 individuals in spring time in the study area. Results of the 2012-2015 surveys were also used to study factors influencing Asiatic Wild Ass distribution throughout the study area, which showed that the probability of Asiatic Wild Ass presence decreased with human disturbances and number of households, and increased with vegetation productivity (Normalized Difference Vegetation Index) and suitable elevation.[124] This data was used to generate spatially explicit model predictions of Asiatic Wild Ass habitat within the study area for the study period, which suggests low to medium habitat suitability in the Project's EAAA, with the lowest habitat suitability overlapping existing mining and transportation infrastructure.

[122] Kaczensky, P., Bayarbaatar, B., Payne, P., Strindberg, S., Walzer, C., Batsaikhan, N., Bolortsetseg, S., Victurine, R., and Olson, K. 2020. A conservation strategy for khulan in Mongolia: background and key considerations. NINA Report 1889. Norwegian Institute for Nature Research.
[123] Bayarbaatar, B., S. Strindberg, P. Kaczensky, J. Payne, B. Chimeddorj, G. Naranbaatar, S. Amarsaikhan, B. Dashnyam, T. Munkhzul, T. Purevsuren, D.A. Hosack and T. K. Kuller. 2017. Mongolian Gobi supports the world's largest population of Kulan (*Equus hemionus*) and Goitered gazelles (*Gazella subgutturosa*). Oryx 51(4):639-647. doi:10.1017/S0030605316000417
[124] Bayarbaatar, B., Mueller, T., Strindberg, S., Leimgruber, P., Kaczensky, P. and T. Fuller. 2016. Human activities negatively impact distribution of ungulates in the Mongolian Gobi. Biological Conservation. 203, 168-175. http://dx.doi.org/10.1016/j.biocon.2016.09.013



Source: Bayarbaatar, B. et al. (2016).[125] Project's EAAA overlaid in red (approximated).

FIGURE B7-3: STUDY AREA OF 2012-2015 SURVEYS

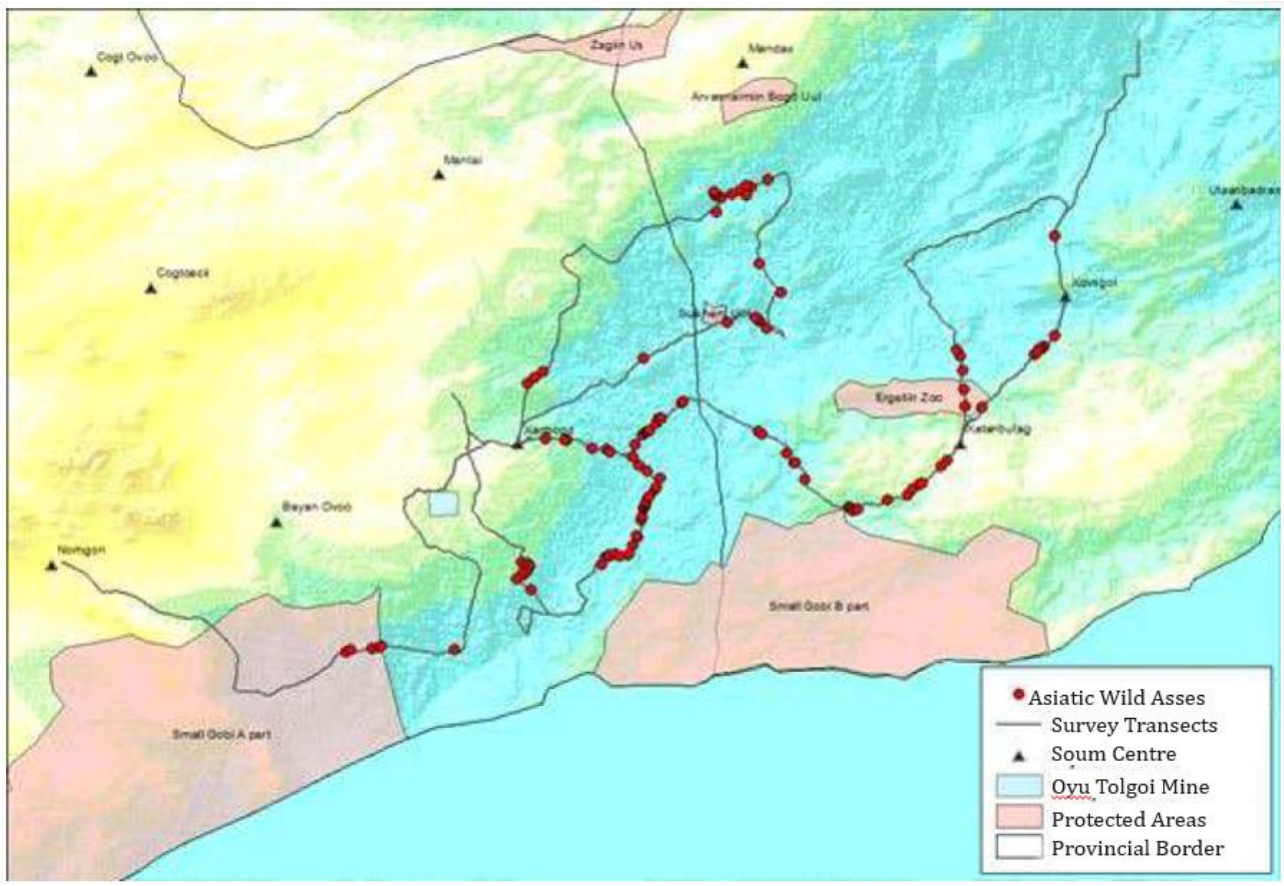


Source: Bayarbaatar, B. et al. (2016)

FIGURE B7-4: ASIATIC WILD ASS PREDICTED HABITAT SUITABILITY

[125] Bayarbaatar, B., S. Strindberg, P. Kaczensky, J. Payne, B. Chimeddorj, G. Naranbaatar, S. Amarsaikhan, B. Dashnyam, T. Munkhzul, T. Purevsuren, D.A. Hosack and T. K. Kuller. 2017. Mongolian Gobi supports the world's largest population of Kulan (*Equus hemionus*) and Goitered gazelles (*Gazella subgutturosa*). Biological Conservation 203, 168-175.

More recent wildlife monitoring surveys conducted for the OT Mine's biodiversity monitoring programme in 2022 and 2024 recorded the presence of 6 and 5 individuals feeding within the mine compound itself, respectively. OT Mine Surveys conducted across Omnogobi and Dornogobi in May and August 2022 recorded 2,215 in spring (115 herds) and 1,379 individuals in autumn (98 herds), with foals accounting for 8.5% and 14.2% of the herds. It should be noted that no transects were conducted in the EAAA north of the OT mine and thus no observations were made in the EAAA. Many of the observations were recorded in areas overlapping with the Galba Gobi KBA/IBA, and in the vicinity of the Small Gobi B SPA and the Ergeliin Zoo Nature Reserve due to higher levels of plant productivity and vegetation cover in these areas in 2022.[126]

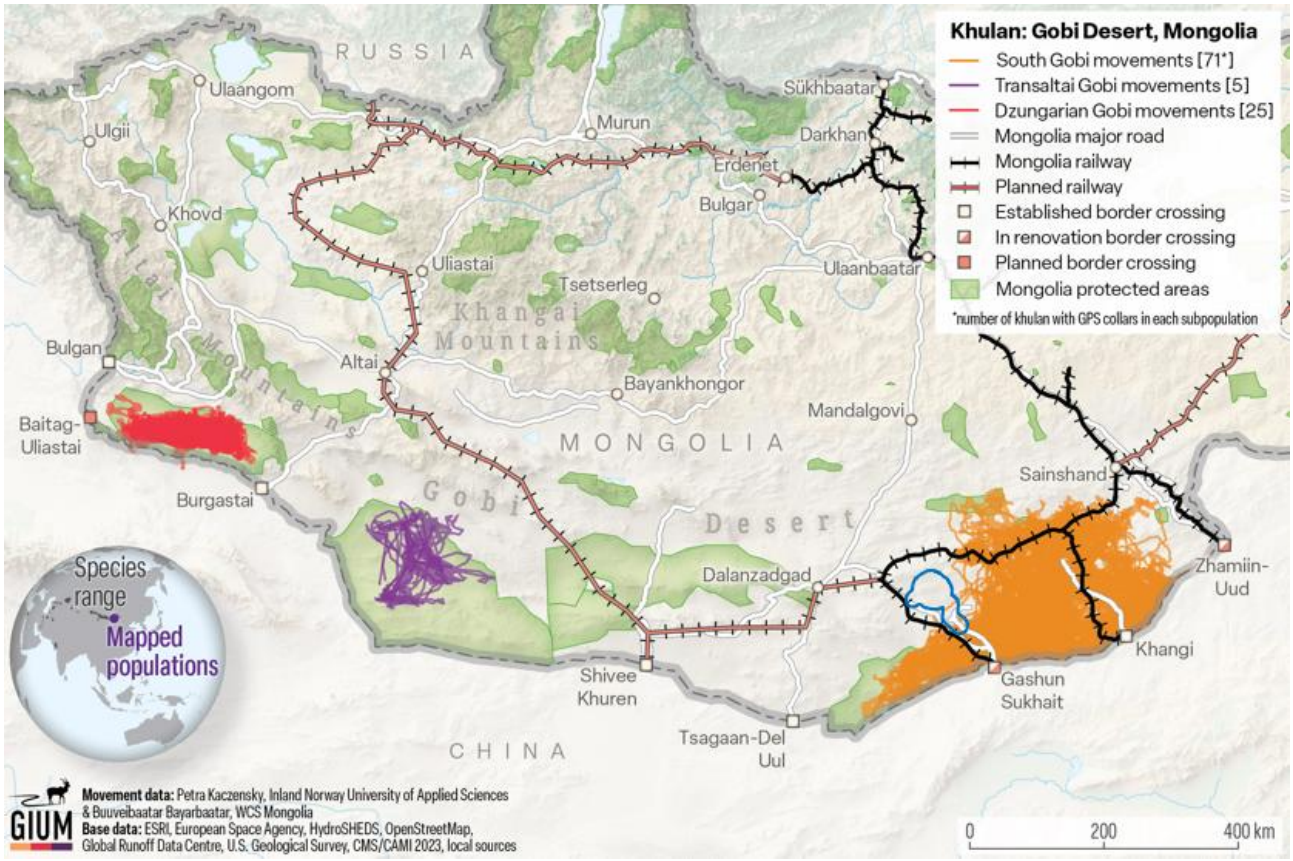


Source: OT Mine, 2022 Report

FIGURE B7-5: SURVEY TRANSECTS AND LOCATIONS OF RECORDED ASIATIC WILD ASSES FROM OYU TOLGOI 2024 MONITORING

Overall, known movement corridors of Asiatic Wild Ass populations in the Southeast Gobi region are mapped in the Convention on the Conservation of Migratory Species of Wild Animals' (CMS) Atlas of Ungulate Migration based on data aggregated from multiple studies using tracking data from a total of 71 collared individuals, as shown in the figure below.

[126] 2022 and 2024 Environmental Management Plan Implementation Report for Oyu Tolgoi Copper-Gold Mining Project located in Khanbogd Soum, Umnogovi Province. 2022 Report available at: https://admin.ot.mn/wp-content/uploads/AER_2022.pdf. 2024 Report made available through communication with OT Mine.



Source: Atlas of Ungulate Migration, CMS.[127] EAAA location outlined in blue (approximated).

FIGURE B7-6: MOVEMENT CORRIDORS OF ASIATIC WILD ASS IN MONGOLIAN GOBI

Regional distribution and movement corridors of the species is known to be dependent on accessibility of water sources (ephemeral and permanent), as they typically require 12-15 litres of water per day. Payne et. al (2020) tracked 41 Asiatic Wild Asses in southeast Mongolia over a 100,000 km^2 study area (which overlaps with the EAAA). Though the tracked individuals were collared during two different capture events two years apart, the combined range of these groups were almost identical, as well as matching the range of individuals tracked between 2012-2015 by Bayarbaatar et. al (2017), suggesting the movement patterns of sampled individuals are highly representative of the larger population in the South Gobi Region. The study identified 53 waterpoints in the study area visited by the collared animals (10 that are 'very highly' frequented and 43 that are 'highly' frequented) that are of "population-level importance" due to the high visitation rates of these sources. ***Figure B7-7*** shows the locations of waterpoints and visitation rates in the region (Payne et al.) and ***Figure B7-8*** presents the waterpoint locations with respect to the EAAA. These figures show that the EAAA only overlaps with only one waterpoint with 'very low' frequency rate located at the southern end of the OHL, while the rest of the EAAA does not contain any waterpoints identified by Payne *et al*. The ESIA baseline surveys did not find permanent water bodies in the Project area, though dry riverbeds are present where Asiatic Wild Asses may dig for water (given sufficient subsurface flow).

[127] https://www.cms.int/gium/migration-atlas

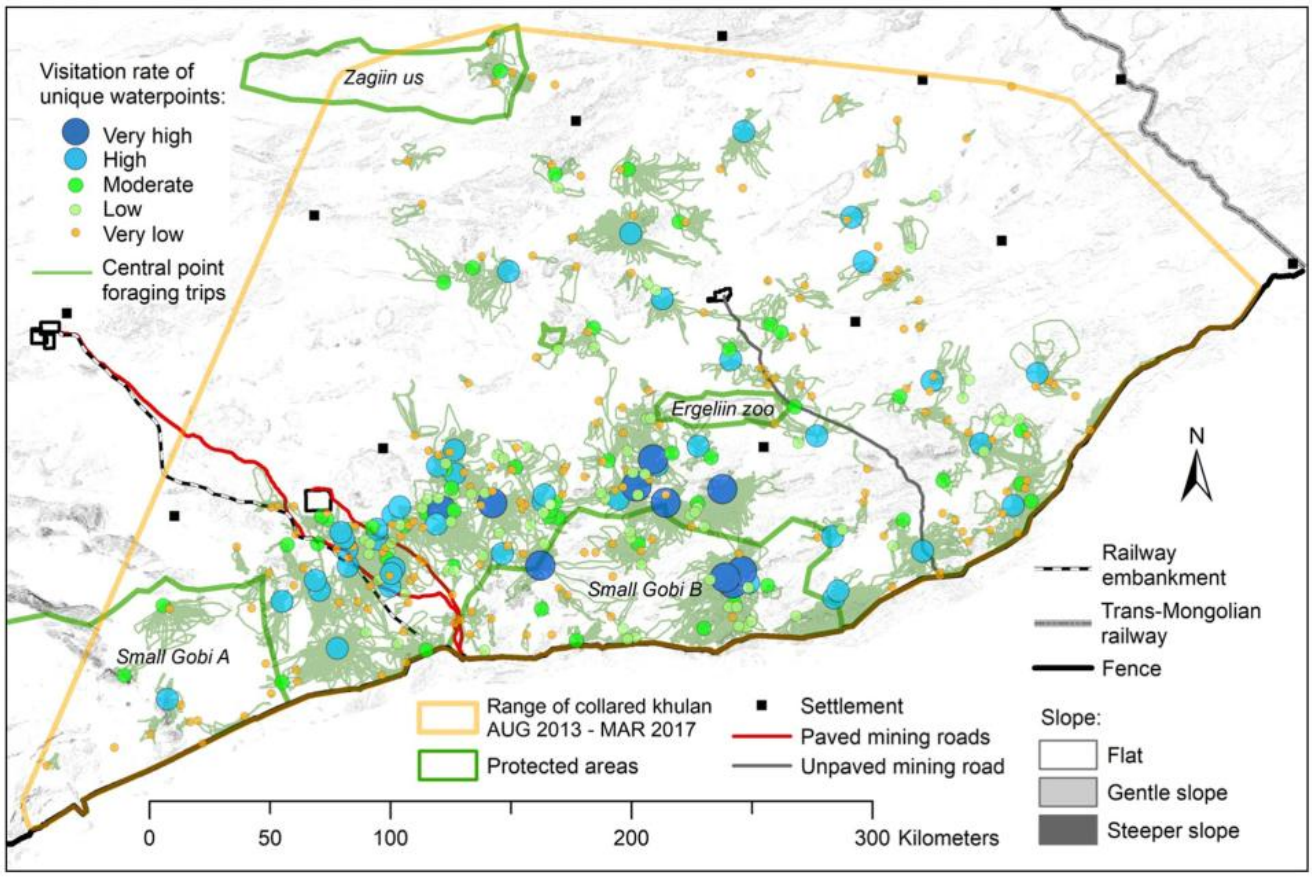
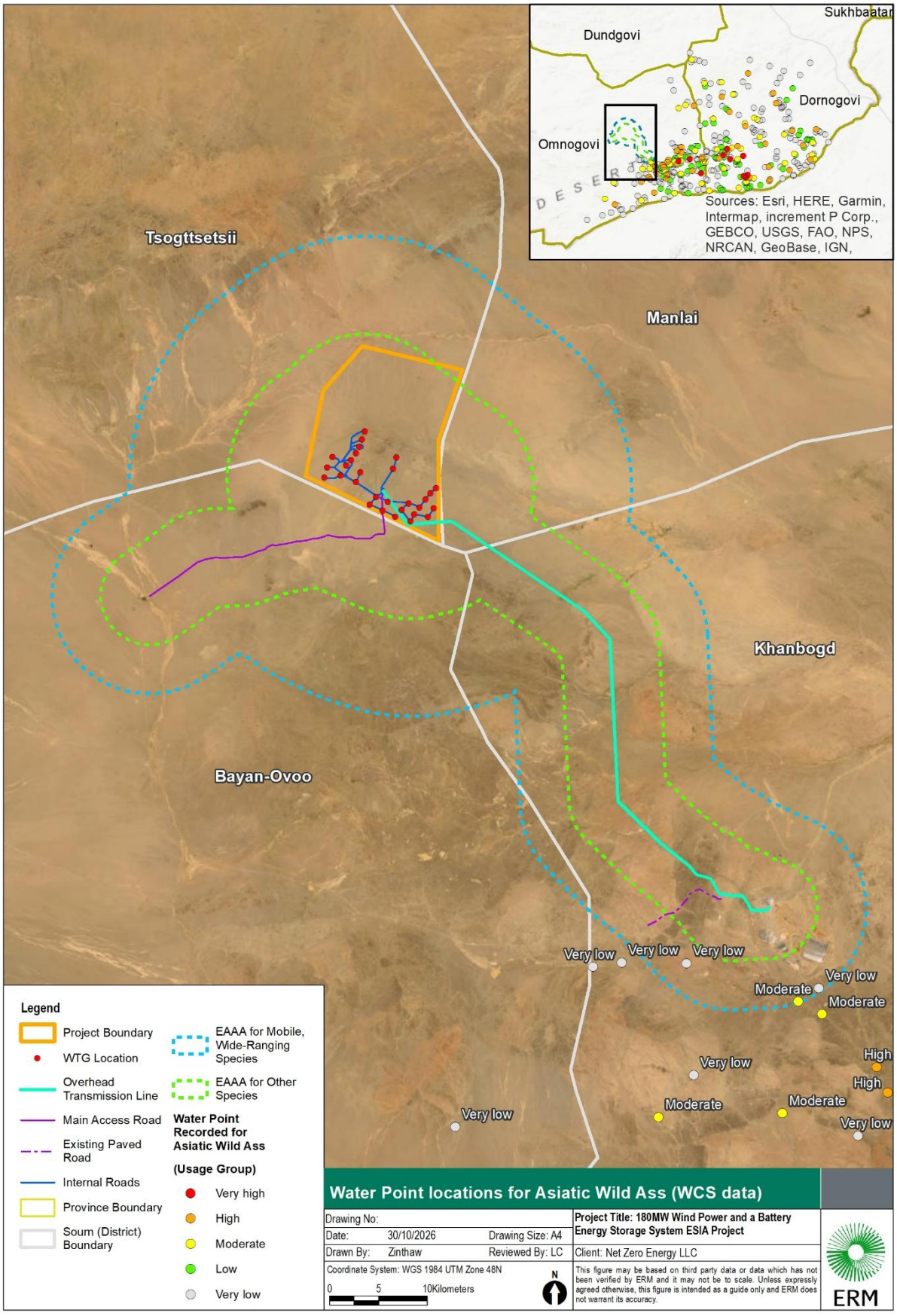


FIGURE B7-7: ASIATIC WILD ASS VISIT RATES OF WATERPOINTS IN SOUTHEAST GOBI

Record from Baseline Surveys

A total of 36 individuals were observed 13 times during all baseline surveys conducted between August 2024 and May 2025, except for November 2024. Around 80 percent of all records of the Asiatic Wild Ass were observed outside the WTG area in September and November 2024 due to opportunistic movement toward more vegetated areas. Interviews conducted with local herders in September and November 2024 indicate that herds of 200-300 individuals, 300-400 individuals, and over 100 individuals have been seen within the WTG area and north of the WTG area. The iNaturalist database includes 36 'research grade' observations in Mongolia between 2013 and 2025, only two of which overlap with the EAAA and three are located on the southern and southeastern edges of the EAAA (which aligns with data presented above).



Source: Payne et al. (2020)

FIGURE B7-8: REGIONAL WATERPOINTS WITH RESPECT TO EAAA

Critical Habitat Rationale

Considering the Asiatic Wild Ass is a migratory species listed as EN on the Mongolian Red List, it is assessed against CH Criterion 3(a) and Criterion 1(c). Regarding CH Criterion 1(c), IFC PS6 and its associated Guidance Note do not prescribe a quantitative threshold for what constitutes "important concentrations of a nationally or regionally listed EN or CR species". However, given that a globally important concentration of an EN or CR species on the IUCN Red List is ⩾ 0.5% of the global population AND ⩾ 5 reproductive units, this same quantitative threshold, i.e. ⩾ 0.5% of the national/regional population (i.e. at least 455 individuals) and ⩾ 5 reproductive units, will be applied for the purpose of this assessment. To meet Criterion 3(a), the Project's EAAA must sustain ⩾ 1% of the global population (i.e. at least 1,083 individuals), on a cyclical or otherwise regular basis.

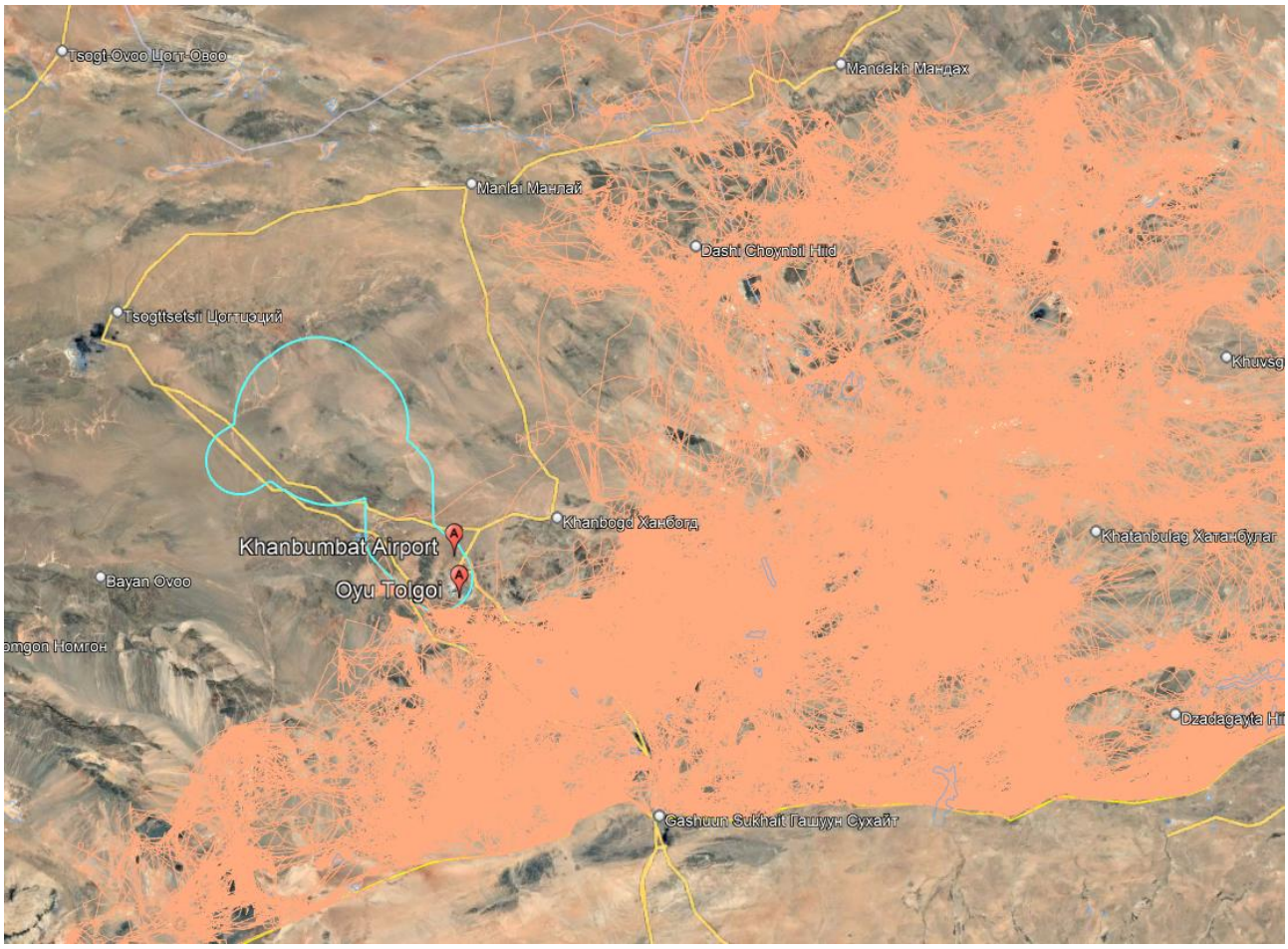
Although population density estimates for the Asiatic Wild Ass in the Southeast Gobi region is available (0.45 – 0.83 individuals per km^2), intraregional density may vary widely depending on seasonal conditions, extent of anthropogenic disturbances, as well as availability of food and water.

Consultations with Dr. Buuveibaatar Bayarbaatar, a leading expert on Mongolian nomadic ungulates and co-author of several aforementioned studies, emphasized the importance of two factors on Asiatic Wild Ass distribution in Mongolia: (i) presence of anthropogenic disturbances (particularly mining and linear infrastructure), and (ii) accessibility of waterpoints. As the species is known to move over the largest distances annually among terrestrial migrants globally[128], their high degree of nomadism makes them more susceptible to factors that disrupt or restrict movement dynamics.

As presented in the previous section, available evidence and insights from the expert consultation indicate that the Project's EAAA is located on the northern and western edges of core habitats for the Asiatic Wild Ass in the Southeast Gobi region; however, the EAAA itself likely does not support an important population of the species. The EAAA was predicted as containing habitats of low to medium suitability for the species (Bayarbaatar et. al, 2017), which corresponds with data showing that the majority of the EAAA (except the southernmost periphery) does not overlap with key movement corridors (CMS, 2026) nor important waterpoints, i.e. those with 'high' to 'very high' visitation rates (Payne et. al, 2020). It is likely that the high level of aridity, rainfall variability, and lack of permanent waterbodies in the Project area make it less attractive than areas to the south and east of the EAAA, especially given the species' daily water consumption needs. Furthermore, the presence of existing infrastructure—particularly the Khanbogd-Manlai highway—appear to constrain most (known) Asiatic Wild Ass movement west of the Khanbogd-Manlai road and north of the Oyu Tolgoi Mine and Khanbumbat Airport (see ***Figure B7-9***). Given the above, and that only 36 individuals were directly observed over six (6) survey periods in the Project area (while the validity of local herders' accounts cannot be verified), it is considered unlikely that the Project's EAAA supports ⩾ 0.5% of the national/regional population (i.e. at least 455 individuals) or ⩾ 1% of the global population (i.e. at least 1,083 individuals).

The Asiatic Wild Ass does not meet the thresholds for Critical Habitat under PS6 Criterion 3(a) and ESR6 Criterion 4(a), or PS6 Criterion 1(c) and ESR6 Criterion 2(c).

[128] Joly, K., Gurarie, E., Sorum, M.S. et al. 2019. Longest terrestrial migrations and movements around the world. Sci Rep 9, 15333. https://doi.org/10.1038/s41598-019-51884-5



Source: CMS (2026) and Google Earth Pro.

FIGURE B7-9: ASIATIC WILD ASS MOVEMENT CORRIDORS WITH RESPECT TO MAJOR REGIONAL ROAD NETWORK

CRITICAL HABITAT ASSESSMENT OF PLANT SPECIES

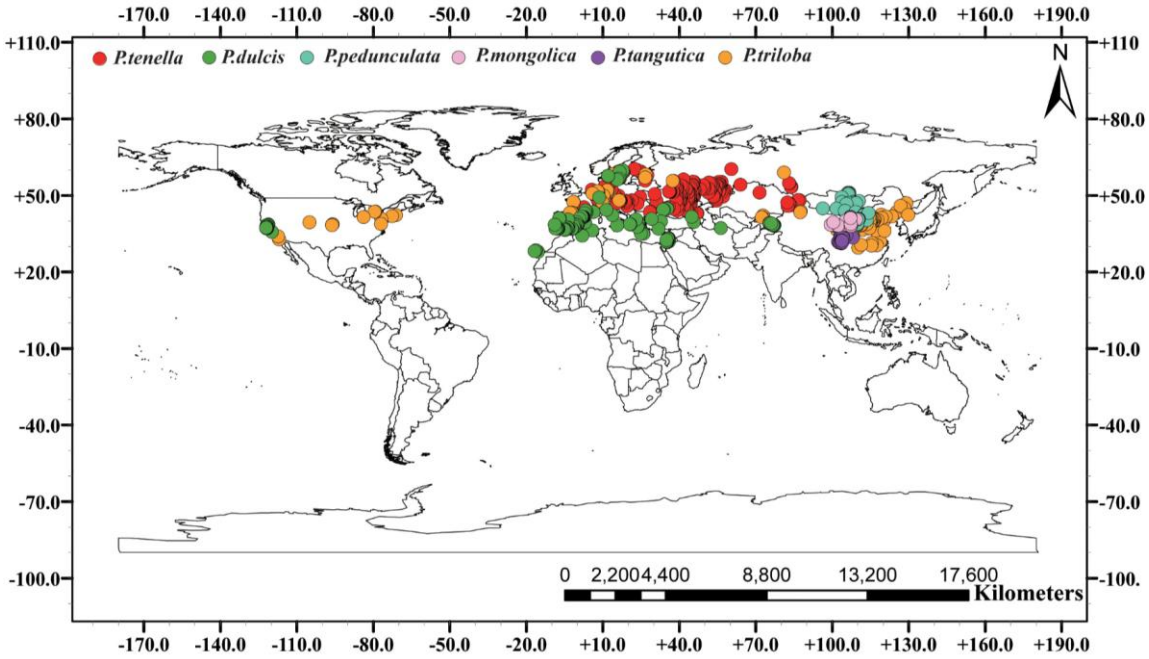
Amygdalus mongolica

- CH Criterion: 1(c)
- IUCN Red List: Not evaluated
- Mongolian Red List: Endangered
- National Status (Law on Flora & Mongolian Red Book): Rare

Amygdalus mongolica—also referred to by the taxonomic synonym *Prunus mongolica*—is present in Mongolia and China. It is known from the southern-central and southeastern Gobi regions of Mongolia[129], as well as in the Gansu, Inner Mongolia, and Ningxia regions of northern China, with a reported elevation range of 1,000 – 2,400 m.[130] Although the species' global distribution has not been quantified, given that *A. mongolica* can be found from southern Mongolia to Inner Mongolia and Ningxia, it is considered likely that the species' EOO exceeds 50,000 km^2, and thus does not meet the threshold for CH criterion 2 as a range-restricted species.

Amygdalus mongolica is considered a relict species, which means it was once widespread but has survived environmental changes and is now often found in restricted, isolated habitats, and exhibit distinct adaptations to its environment, namely its xeromorphic characteristics. This shrub species is extremely tolerant to dought and aridity[131] and therefore is widely established in the Gobi Desert, where it is found in hilly areas, stony slopes, rocky outcrops, ravines and gullies, sand dunes, and dry riverbeds of desert, semi-desert and desert steppe.[132,133] It is used for both traditional medicine as an essential woody oil crop with high oil content in its seeds that provide both nutritional and medicinal value, while it is also an important pasture species for grazing livestock in the Gobi region.[134, 135] *A. mongolica* also serves important ecological functions in the desert and desert steppe environments such as wind control, sand fixation, and soil and water conservation. The number of mature individuals, as well as the species' distribution, number of habitats, and habitat area are declining. The species' main threats include habitat loss and degradation due to anthropogenic impacts, livestock overgrazing, mining activities, as well as the impacts of climate change.[136]

[129] Urgamal, M. et al. 2018. Species Catalogue of Rare and Threatened Vascular Plants of Mongolia. Ulaanbaatar. Mongolia. Bembi San Press. 193pp. https://www.researchgate.net/publication/325248103_Species_Catalogue_of_Rare_and_Threatened_Vascular_Plants_of_Mongolia
[130] Flora of China. 2025. *Amygdalus mongolica*. Available at: http://www.efloras.org/florataxon.aspx?flora_id=2&taxon_id=200010615
[131] Wang, J.; Zheng, R.; Bai, S.; Gao, X.; Liu, M.; Yan, W. Mongolian almond (Prunus mongolica Maxim): The morpho-physiological, biochemical and transcriptomic response to drought stress. PLoS ONE 2015, 10, e0124442.
[132] Nyambayar, D., Oyuntsetseg, B. and Tungalag, R. (compilers). 2011. Jamsran, Ts., Sanchir, Ch., Bachman S., Soninkhishig, N,, Gombobaatar, S., Baillie, J.E.M., and Tsendeekhuu Ts. (editors). Regional Red List Series Vol. 9. Plants. Zoological Society of London, National University of Mongolia, Admon Press.
[133] Wang, J., Zheng, R., Bai, S., Gao, X., Liu, Min, Y. W., Chan, Z. 2015. Mongolian Almond (Prunus mongolica Maxim): The Morpho-Physiological, Biochemical and Transcriptomic Response to Drought Stress. PLOS ONE 10(4):e0124442. doi: 10.1371/journal.pone.0124442
[134] Urgamal, M., & Kwon, O. 2015. The handbook for traditional knowledge on biological resources (Vol. 1, p. 632). Ulaanbaatar: SeoHyeong Publishing Printed in the Republic of Korea. National Institute of Biological Resources (NIBR). ISBN 978-89-6811-202-7 (93470).
[135] Magsar, U., Baasansuren, E., Tovuudorj, M. E., Shijirbaatar, O., Chinbaatar, Z., Khureltsetseg, L. and Kwon, O. 2013. Medicinal plant diversity in the southern and eastern Gobi Desert region, Mongolia. Journal of Ecology and Environment 42(4): 1-13. DOI 10.1186/s41610-018-0064-5
[136] Nyambayar et al. *Op. cit.*



Source: Wang *et. al*, 2021[137]

FIGURE B7-10: GLOBAL DISTRIBUTION OF *A. MONGOLICA*

Overall, relatively limited information is available on the species' distribution and ecological requirements within Mongolia, as most scientific literature focuses on populations within China, genetic analysis, and potential medical applications. The species is classified as Endangered on the Mongolian Red List due to a regional extent of occurrence (EOO) of less than 5,000 km² and an area of occupancy of no more than 500 km^2, with regional distribution as depicted below.[138] However, it should be noted that the Mongolian Red List for Plants was published in 2012 (around 14 years ago) and thus would be superseded by more recent data.

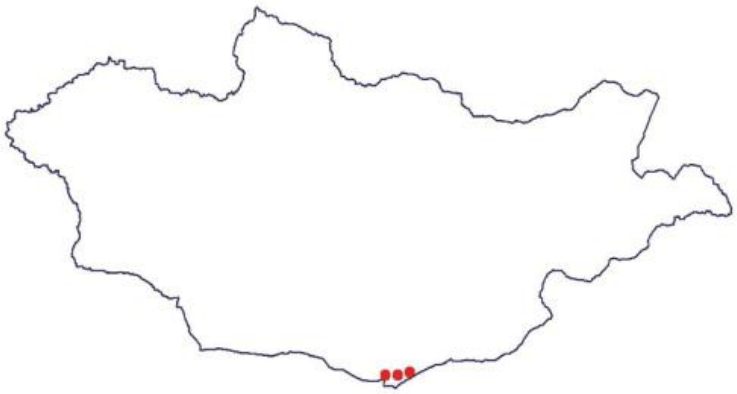


FIGURE B7-11: MONGOLIAN DISTRIBUTION OF *A. MONGOLICA* (MONGOLIAN RED LIST, 2012)

[137] Wang, W., Li, X. J., Zhang, Y. L., and X, X. Q. 2021. Current Situation, Global Potential Distribution and Evolution of Six Almond Species in China. Frontiers in Plant Science. 12. 619883. 10.3389/fpls.2021.619883.
[138] Nyambayar, D., Oyuntsetseg, B. and Tungalag, R. (compilers). 2012. Jamsran, Ts., Sanchir, Ch., Bachman S., Soninkhishig, N,, Gombobaatar, S., Baillie, J.E.M., and Tsendeekhuu Ts. (editors). Regional Red List Series Vol. 9. Plants. Zoological Society of London, National University of Mongolia, Admon Press.

Consultation with a Mongolian flora expert, Dr. Magsar Urgamal, clarified the existing availability and quality of data on *A. mongolica* as of 2026 (refer to ***Section B2.5*** for details on the Subject Matter Expert). The results revealed that there is indeed a dearth of published research/reports focused specifically on *A. mongolica's* population, distribution, habitat and ecology within Mongolia, in contrast with more readily available data on the species in China. Expert insight provided during the consultation also indicates that information on the iNaturalist database is sufficiently reliable for use in this assessment, as the platform is commonly used by Mongolian researchers and scientists to upload their records and peer-review others' observations (including the expert himself). All 87 sightings of *A. mongolica* recorded in Mongolia on iNaturalist are 'verifiable', 86 of which are also designated as 'research grade'.[139] These observations were recorded between 2015-2026, with 40% documented in 2025. Observations are scattered across the southern and eastern Gobi Desert regions of Mongolia, from the Gobi Gurvan Saikhan National Park in the west to Dornogobi Province in the east. Approximately one third of the observations were reported from areas in and around Khanbogd soum and the Oyu Tolgoi mine, likely associated with the mine's biodiversity monitoring and conservation schemes. Taking into account iNaturalist data, as well as results of the Project's baseline surveys, the national EOO of *A. mongolica* is at least 137,000 km^2, as opposed to the EOO of <5,000 km^2 stated in the Mongolian Red List for Plants.



FIGURE B7-12: MONGOLIAN DISTRIBUTION OF *A. MONGOLICA* (INATURALIST, 2026)

Record from Baseline Surveys

A. mongolica was identified in four (4) out of 19 flora sampling plots during the August 2024 surveys, two of which were located along the transmission line and two were found in the WTG area. During the May 2025 surveys, *A. mongolica* was identified in four (4) out of 43 plots, all of which were within the WTG area and different from the four plots from the August survey. Across all 8 plots in which the species was identified, it accounted for between 0.5 – 4% of the

[139] 'Verifiable' status is applied to any observation that contains a valid date, accurately georeferenced, has photos or sound, and isn't of a captive/cultivated organism. 'Research Grade' status is achieved when a 'Verifiable Observation' has been reviewed and the community is in agreement on the ID.

total vegetation cover in each plot. These results indicate relatively low density within plots as well as low abundance and occurrence across all plots in the Project area.

Critical Habitat Rationale

While this species has not been evaluated on the IUCN Red List, it has been classified as Endangered on the Mongolian Red List, therefore it is assessed against CH Criterion 1(c). IFC PS6 and its associated Guidance Note do not prescribe a quantitative threshold for what constitutes "important concentrations of a nationally or regionally listed EN or CR species". However, given that a globally important concentration of an EN or CR species on the IUCN Red List is ⩾ 0.5% of the global population AND ⩾ 5 reproductive units, this same quantitative threshold will be applied for the purpose of this assessment, i.e. ⩾ 0.5% of the regional population and ⩾ 5 reproductive units, as was done for the assessment of the Asiatic Wild Ass.

Though information in the public domain is limited for the species' population size, density, trends, or distribution in Mongolia, most recent available data suggests a national EOO of no smaller than 137,000 km^2, which contrasts with the Mongolian Red List for Plants' assessment in 2012 (EOO of <5,000 km² and AOO of <500 km^2) which corresponds with regional EN status under IUCN criteria B1ab and B2ab (see figure below).

B. Geographic range in the form of either B1 (extent of occurrence) AND/OR B2 (area of occupancy)			
	Critically Endangered	Endangered	Vulnerable
B1. Extent of occurrence (EOO)	< 100 km²	< 5,000 km²	< 20,000 km²
B2. Area of occupancy (AOO)	< 10 km²	< 500 km²	< 2,000 km²
AND at least 2 of the following 3 conditions:			
(a) Severely fragmented **OR** Number of locations	= 1	≤ 5	≤ 10
(b) Continuing decline observed, estimated, inferred or projected in any of: **(i)** extent of occurrence; **(ii)** area of occupancy; **(iii)** area, extent and/or quality of habitat; **(iv)** number of locations or subpopulations; **(v)** number of mature individuals			
(c) Extreme fluctuations in any of: **(i)** extent of occurrence; **(ii)** area of occupancy; **(iii)** number of locations or subpopulations; **(iv)** number of mature individuals			

Source: Guidelines for Using the IUCN Red list Categories and Criteria (2024)

FIGURE B7-13: IUCN CRITERIA B FOR THREATENED CATEGORY EVALUATION

Based on iNaturalist and baseline survey data, *A. mongolica* has a wider geographic range than is formally documented in the Mongolian Red List for Plants. Furthermore, it is likely that there are additional locations throughout the region that may contain this species given that suitable habitats (arid desert and desert steppe habitats with rocky hill slopes at 1,000-2,400 m elevations) can be found throughout the southern and eastern Gobi regions of Mongolia. Therefore, it is highly likely that a re-assessment of *A. mongolica* would reclassify the species into a non-threatened status (i.e., not CR, EN or VU). Expert opinion obtained from the consulted Mongolian flora specialist also indicates that, based on extensive field experience throughout the Gobi Desert regions of Mongolia, *A. mongolica* is more concentrated in areas located farther south from the Project's EAAA rather than within the EAAA itself, which is consistent with documented observations of patchy distribution and isolation within highly preferable habitats (reflecting its status as a relict species) rather than continuous distribution across a given landscape. Overall, it is considered unlikely that the Project's EAAA for plants holds ⩾ 0.5% of the national/regional population and ⩾ 5 reproductive units.

***Amygdalus mongolica* does not meet the thresholds for Critical Habitat under PS6 Criterion 1(c) or ESR6 Criterion 2(c).**

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