International ESIA for an Integrated Renewable Energy Project

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

Annex F: Construction Biodiversity Management Plan

PREPARED FOR

Net Zero Energy LLC
MCS and URECA

DATE
2 November 2026

REFERENCE
0747189



DOCUMENT DETAILS

DOCUMENT TITLE	International ESIA for an Integrated Renewable Energy Project
DOCUMENT SUBTITLE	180MW Wind Power and Battery Energy Storage System, Tsogttsetsii soum, Mongolia
PROJECT NUMBER	0747189
DATE	2 November 2026
VERSION	02
AUTHOR	ERM-Hong Kong, Limited
CLIENT NAME	Net Zero Energy LLC (MCS and URECA)

DOCUMENT HISTORY

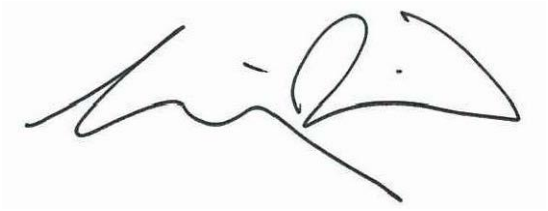
				ERM APPROVAL TO ISSUE		
VERSION	REVISION	AUTHOR	REVIEWED BY	NAME	DATE	COMMENTS
Version	01	TP	Tom Glenwright	Craig Reid	16 October 2026	Addressed IFIs' comments
Version	02	TP	Tom Glenwright	Craig Reid	2 November 2026	Addressed IFIs' comments

SIGNATURE PAGE

International ESIA for an Integrated Renewable Energy Project

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KEY DEFINITIONS

Protected Area: Legally protected areas meet the IUCN definition: "A clearly defined geographical space, recognized, dedicated and managed, through legal or other effective means, to achieve the long-term conservation of nature with associated ecosystem services and cultural values." This includes areas proposed by governments for such designation (IFC, 2012).

Natural Habitat: Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area's primary ecological functions and species composition (IFC, 2012).

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

Invasive Alien Species: An invasive species is an organism (plant or animal) that causes ecological or economic harm in a new environment. Invasive species may be alien or exotic (not native or indigenous to the particular area, geography or region).

No Net Loss (NNL): An approach and goal for a development project, policy, plan or activity in which the impacts on biodiversity it causes are balanced by measures taken to avoid and minimize the impacts, to restore affected areas and finally to offset the residual impacts, so that no loss remains. No net loss (NNL) is defined by EBRD as "The point at which project-related impacts on priority biodiversity features are reduced by avoidance, minimisation and/or reinstatement measures, and offsetting compensates fully for all significant residual impacts – that is to say, no significant net impacts on biodiversity remain" (EBRD ESR6, 2024). No net loss requirements are applicable to natural habitats (as defined by IFC PS6) and priority biodiversity features (as defined by EBRD ESR6).

Biodiversity Offset: According to EBRD ESR6 (2024), a biodiversity offset refers to "Measurable conservation outcomes resulting from actions designed to compensate for significant residual adverse biodiversity impacts" and "The goal of biodiversity offsets is to achieve "no net loss" and preferably a net gain of biodiversity on the ground". Biodiversity offsets should also be considered a last resort in any mitigation package and should only be attempted with input from credible external experts with relevant experience in their design and implementation.

Mitigation Hierarchy: A tool commonly applied in Environmental and Social Impact Assessments (ESIAs) which helps to manage biodiversity risk. The hierarchy of controls that begins with avoidance, then considers minimization or reduction of impacts, followed by restoration actions and finally compensation for biodiversity loss (e.g. through offsetting) as a last resort measure.

Rehabilitation: A management action that aims to restore a certain level of ecosystem functioning in degraded sites, to reverse negative impacts by repairing and replacing the

essential or primary ecosystem structures and functions which have been altered or eliminated by disturbance.

Restoration: The process of reclaiming habitat and ecosystem functions by restoring the lands and waters on which plants and animals depend. Differs from rehabilitation, in that the goal is to restore the ecosystem or habitat to its former state or better.

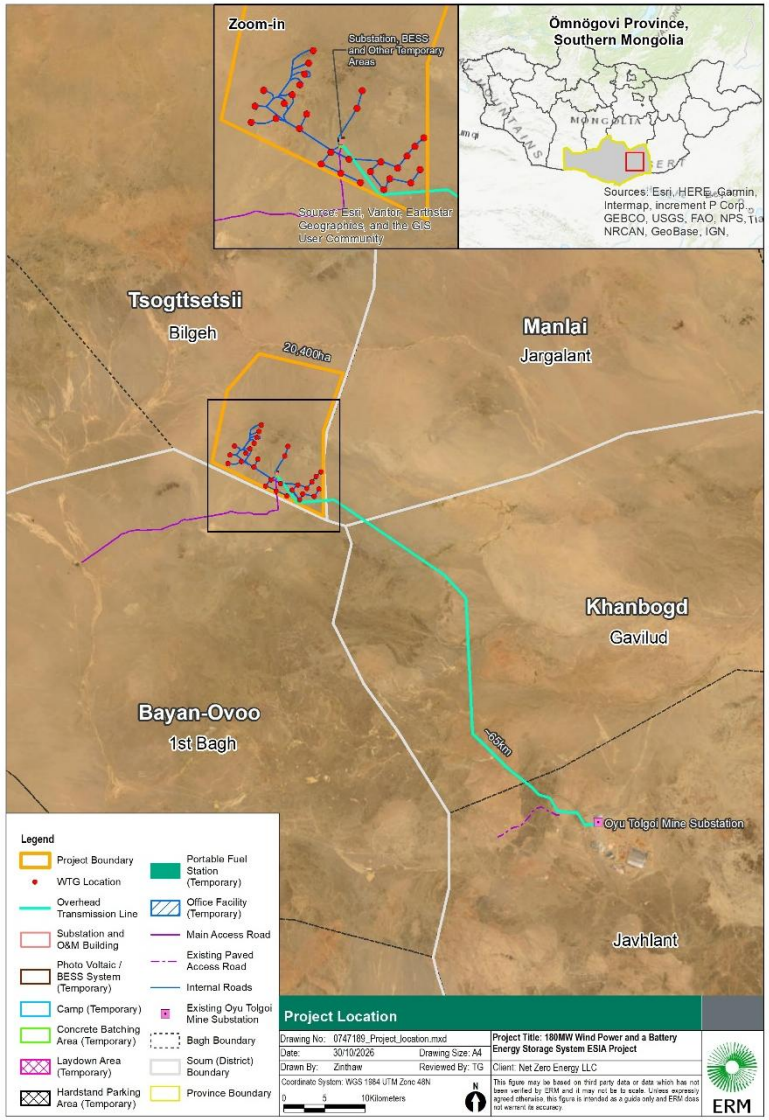
F1. INTRODUCTION

ERM-Hong Kong Ltd. (ERM) was commissioned by Net Zero Energy (NZE) to conduct an Environmental and Social Impact Assessment (ESIA) for a 180 MW onshore wind farm (the 'Project') in Tsogttsetsii Soum, Umnugobi Province, Mongolia, in accordance with the International Finance Corporation's Performance Standards (IFC PS, 2012) and the European Bank for Reconstruction and Development Environmental and Social Requirements (EBRD ESR, 2025). The findings of the ESIA and the Biodiversity Impact Assessment (BIA) have been used to inform the development of a Construction-phase Biodiversity Management Plan (BMP) for the Project.

F1.1 PROJECT BACKGROUND

The Project's wind farm is located in Tsogttsetsii soum, Umnugobi Province in southern Mongolia, approximately 60 km from the Oyu Tolgoi (OT) Mine to which the overhead transmission line will connect. The Project will consist of the components listed below and shown in ***Figure F1-1*** (refer to Chapter 3 of the ESIA 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.



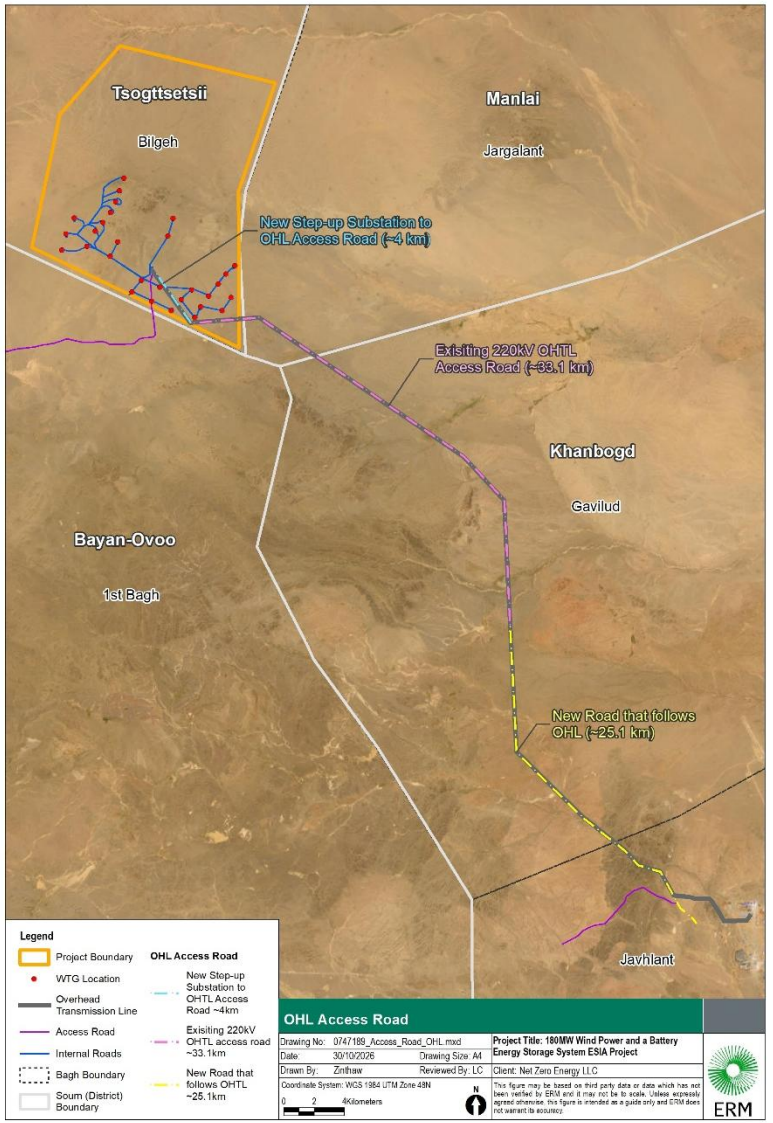


FIGURE F1-1: PROJECT LOCATION

F1.2 PURPOSE AND OBJECTIVES OF THE CONSTRUCTION BMP

This document sets out the mitigation, monitoring and management measures for addressing risks and impacts to biodiversity during the Project's construction phase, as well as roles, responsibilities, and reporting arrangements for Construction BMP implementation. It has been developed in line with the mitigation hierarchy (avoidance, minimisation, restoration/rehabilitation, and compensation/offset), as well as applicable standards including Mongolian laws and regulations, IFC PS6, EBRD ESR6, the World Bank Group Environmental, Health and Safety (WBG EHS) Guidelines, as well as Good International Industry Practice (GIIP).

The BMP includes receptor-specific management approaches during the construction phase for biodiversity values of higher conservation concern that are affected by the Project, including natural rangeland habitats and Priority Biodiversity Features (PBF) that must achieve No Net Loss (NNL) objectives in accordance with IFC PS6 and EBRD ESR6 requirements. The overall commitments, strategy, and management framework (with application of the mitigation hierarchy) to achieve NNL outcomes for Project-affected natural habitat and PBFs are documented in the Framework Biodiversity Action Plan (BAP). Nevertheless, specific construction-phase measures that support the implementation of the Framework BAP (and any other biodiversity-related management plans to be developed at a later date) are documented in this Construction-phase BMP.

This BMP applies to all anticipated construction activities for the Project (as described in the ESIA's Project Description in Chapter 3), including all permanent and temporary Project facilities installed and utilised during the construction phase. No construction activities shall commence in any works area until the relevant pre-construction biodiversity requirements applicable to that area have been completed and all required construction-phase biodiversity mitigation and monitoring measures have been integrated into the EPC Contractor's method statements and management plans/procedures.

It should be noted that an Operation-phase Biodiversity Management Plan is not included in this document and must be developed for the Project prior to the commencement of the operation phase, documenting all mitigation, management and monitoring measures to be carried out to address risks/impacts to biodiversity throughout the Project's operations.

The ultimate responsibility for implementation of the BMP resides with the Project Owner, Lenders, and all appointed Contractors (including any sub-contractors and third-party consultants). As a contractual requirement, the contractors, sub-contractors, and suppliers will be required to demonstrate compliance of their activities against the BMP where applicable for their individual scope of work.

F1.3 APPLICATION OF THE MITIGATION HIERARCHY

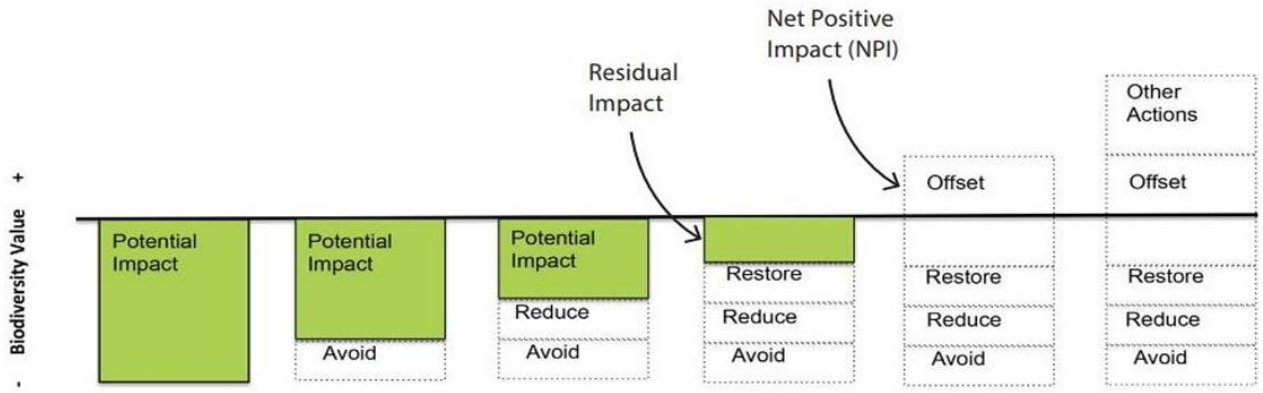
In alignment with IFC PS6 and EBRD ESR6, the protection and conservation of biodiversity and ecosystems is founded on the application of the 'mitigation hierarchy', which adopts a proactive approach toward avoiding and reducing impacts to biodiversity where possible. Sequential steps of the mitigation hierarchy are as follows:

- Identify and anticipate risks of potential adverse impacts to biodiversity through analysis and stakeholder engagement;

- Avoid potential adverse impacts by conducting an alternatives analysis (including a no-project scenario);
- Minimize or reduce the impacts;
- Restore or rehabilitate where possible; and
- Compensate or offset remaining and unavoidable impacts.

In the case of particularly sensitive ecosystems, where ecological impacts can be severe, the guiding principle should generally be "anticipate and prevent" rather than "assess and repair".

Measure	Description
Avoidance	Measures taken to prevent irreplaceable loss of biodiversity or associated ecosystem services. Alternatives include site selection, design and scheduling.
Minimisation	Reduce or minimize the duration, intensity and/or extent of any impact that are not feasibly avoidable. Alternatives include physical controls, operational controls and abatement control.
Restoration/Rehabilitation	Where disturbance to biodiversity or ecosystem services has occurred, remediation may be possible in the form of rehabilitation and restoration. Alternatives include re-establishing habitat types, biodiversity values, and ecosystem services.
Offset/Compensation	Offset or compensate for any residual impacts that cannot be avoided, minimized, or remedied on site. These could include restoration and averted loss offsets.



Adapted from Hardner et al. (2015)

FIGURE F1-2: MITIGATION HIERARCHY

F1.4 ADAPTIVE MANAGEMENT APPROACH

The early identification of key issues, risks, challenges and constraints in the implementation of the BMP (including any failures of critical actions or changes in environmental conditions) through Monitoring and Evaluation (M&E) is essential for adaptive management. This approach enables site-specific solutions to be developed and adjusted based on real-time data. Adaptive management depends on a structures process of collecting data, evaluating results, and responding accordingly to ensure biodiversity outcomes are continually optimized.

Adaptive management allows for biodiversity impacts arising throughout the operational stage to be addressed in a flexible and responsive manner to evolving conditions throughout the

Project's lifecycle. The adaptive management approach not only allows for the modification of previously planned actions within the BMP but also aims to generate new knowledge that contributes to improved biodiversity management in the future. By integrating these learnings, the approach ensures both the best short-term outcomes based on current knowledge and enhanced long-term conservation strategies.

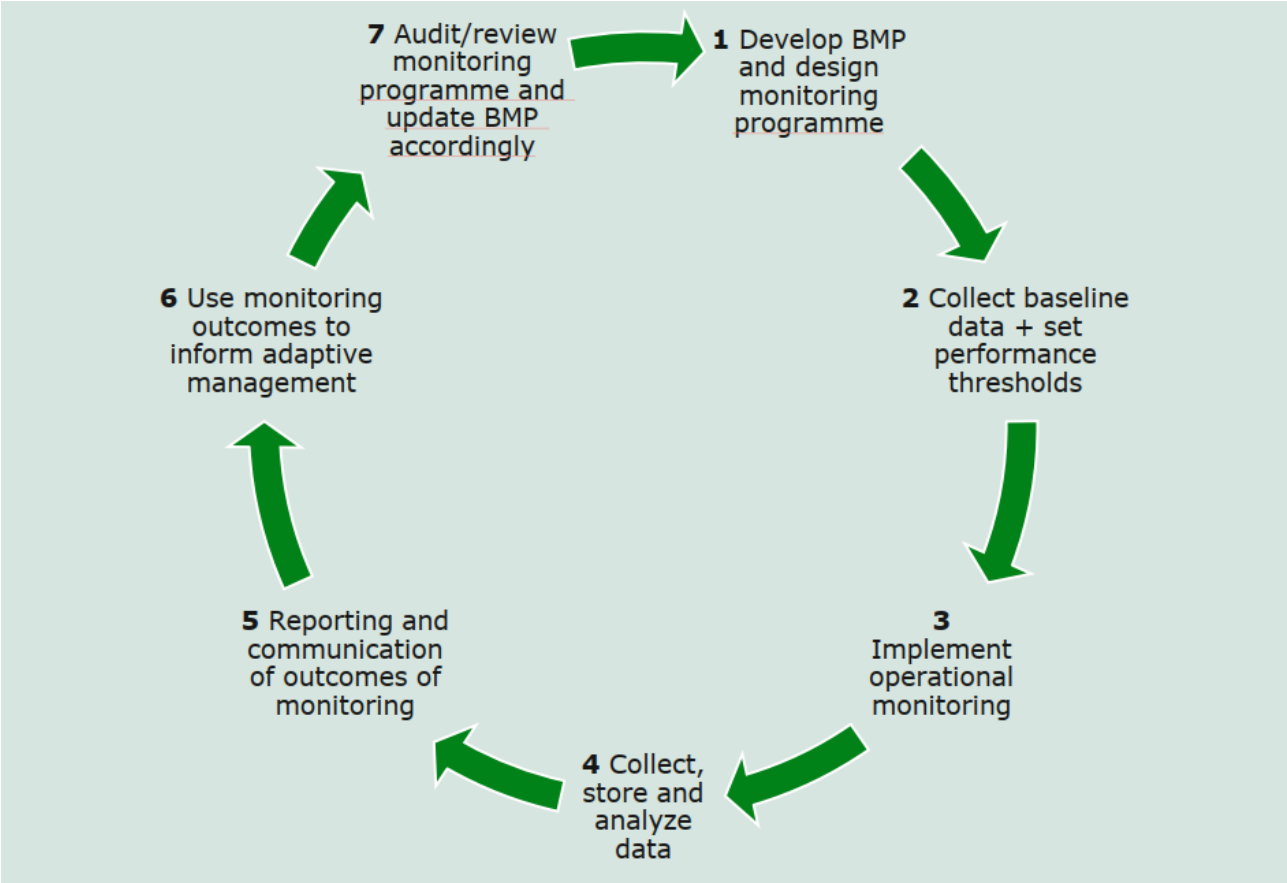


FIGURE F1-3: ADAPTIVE MANAGEMENT CYCLE

The following guidelines apply regarding implementing an adaptive approach to biodiversity management:

- **Establish Baselines and Monitoring Protocols:** Establishing baselines and a robust monitoring framework is critical in understanding the biodiversity context and tracking changes over time. This ensures that impacts are measurable and that responses can be adapted.
- **Implement the Precautionary Principle:** The precautionary principle is integral to biodiversity conservation, especially in cases of uncertainty regarding potential impacts. This approach is used to avoid irreversible damage to biodiversity and ecosystems, even when data may be incomplete.
- **Engage with Local Communities and Stakeholders:** Stakeholder engagement, including with local communities and experts, ensures biodiversity management strategies are contextually relevant and that they address both local and global biodiversity concerns, benefiting from local knowledge and support.
- **Continuous Review and Updates Based on Monitoring Results:** The principle of adaptive management involves regularly reviewing and updating biodiversity management

plans (BMPs) in response to monitoring results and new information. Flexibility in management plans is crucial to improve outcomes based on data-driven feedback.

- **Integration with the Broader Environmental and Social Management System (ESMS):** Biodiversity management should not be handled in isolation but should be integrated into the overall Environmental and Social Management System. This ensures that biodiversity considerations are aligned with broader sustainability goals of the project.
- **Regular Reviews and Audits:** Regular reviews and audits of biodiversity management practices are crucial for assessing effectiveness and identifying areas for improvement. Periodic evaluations and adjustments should be made based on these assessments, which are central to adaptive management.

F1.5 REVIEWS AND UPDATES TO THE BMP

The BMP, and any other associated plans/documents, are intended to be 'live' documents that should regularly reviewed and updated in response to any new changes related to the Project or its context, including (but not limited to):

- Development and/or update of any other biodiversity-related management plans (e.g. BAP) that specify additional construction-phase biodiversity mitigations;
- Any changes in the Project design, construction methodology, management procedures and/or ESIA;
- Results of monitoring activities necessitating changes in mitigation and management measures for the construction phase; and/or
- Lender comments.

Urgent updates in line with the principle of 'adaptive management' can be the responsibility of the E&S Officer Biodiversity Specialist, with support from the E&S Manager, however any material changes to intervention design, the timing of monitoring activities, etc. should be made in consultation with a qualified third-party ecology/biodiversity consultant to ensure accountability.

All changes made to the BMP will be made to the master document and revision numbers and dates provided to track version numbers as part of the Contractor's data and document management system. A summary document should also be produced that summarizes the important changes made to the document for the different version numbers and who authorized these changes.

F2. RELEVANT STANDARDS AND GUIDELINES

The Contractor is responsible for ensuring that on-site practices align with the requirements of international standards and GIIP. The following standards and guidelines detail the performance requirements and mitigation measures that are typically acceptable and considered to represent GIIP:

- IFC (International Finance Corporation) Performance Standards (2012);
- IFC PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- IFC PS6 Guidance Note (2019);

- World Bank Group (WBG) Environmental Health and Safety (EHS) Guidelines (general and sectoral guidelines for wind power);
- EBRD (European Bank for Reconstruction and Development) Environmental and Social Requirements (2024);
- EBRD Environmental and Social Policy (2024);
- EBRD Sub-sectoral Environmental and Social Guidelines (various sectors);
- EBRD ESR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- ADB Environmental and Social Framework
- ADB ESS6: Biodiversity and Sustainable Natural Resources Management
- "Good Practices for Biodiversity Inclusive Impact Assessment and Management Planning" (Hardner et al., 2015);
- "A cross-sector guide to implementing the Mitigation Hierarchy" (Ekstrom et al., 2015);
- "Mitigating biodiversity impacts associated with solar and wind energy development. Guidelines for project developers" (Bennun et al., 2021);
- Windfarms and Birds: Calculating a theoretical collision risk assuming no avoiding action. (NatureScot, 2000);
- Recommended bird survey methods to inform impact assessment of onshore wind farms. (NatureScot, 2017);
- "Post-construction Bird and Bat Monitoring for Onshore Wind Energy Facilities in Emerging Market Countries: Good Practice Handbook and Decision Support Tool" (IFC, EBRD and KfW, 2023);
- "EUROBATS No. 6: Guidelines for Consideration of bats in wind farm Projects" (Rodrigues et al., 2015); and
- "Bats and onshore wind turbines: Survey, assessment and mitigation" (NatureScot, 2021).

F3. SUMMARY OF BIODIVERSITY BASELINE CONDITIONS

Baseline studies through primary surveys and secondary desktop research have identified multiple species of conservation significance that potentially occur within the Project AoI, which is defined as a five (5) km radius from each WTG and a two (2) km buffer from the central line of the OHL and Access Road.

The Project AoI, including the WTG area and most of the OHL, is largely situated within the Eastern Gobi Desert Steppe Ecoregion, while the southern section of the transmission line where it connects to the Oyu Tolgoi substation lies within the Alashan Plateau Semi-Desert Ecoregion. The Project site also overlaps with locally protected areas, as well as located 26.4 km from the Galba Gobi Key Biodiversity Area and Important Bird and Biodiversity Area, and 36.3 km from the Small Gobi A Strictly Protected Area (from the closest point). The WTG area legally protected and internationally recognized areas of biodiversity importance.

The habitat assessment done for this Project has identified the Project's Biodiversity AoI as comprising of predominantly desert-steppe rangelands, a natural habitat constituting <99% of the total AoI. These rangelands are characterized by sparsely vegetated areas and various landscape features such as open desert steppe, mountains and hills, and dry riverbeds, with

drought-adapted shrubs and low glasses thinly distributed throughout. The extent of modified habitats in the AoI is very limited, primarily consisting of the Oyu Tolgoi mine, existing roads, a coal processing facility adjacent to the proposed main access road, and small temporary settlements of nomadic herders.

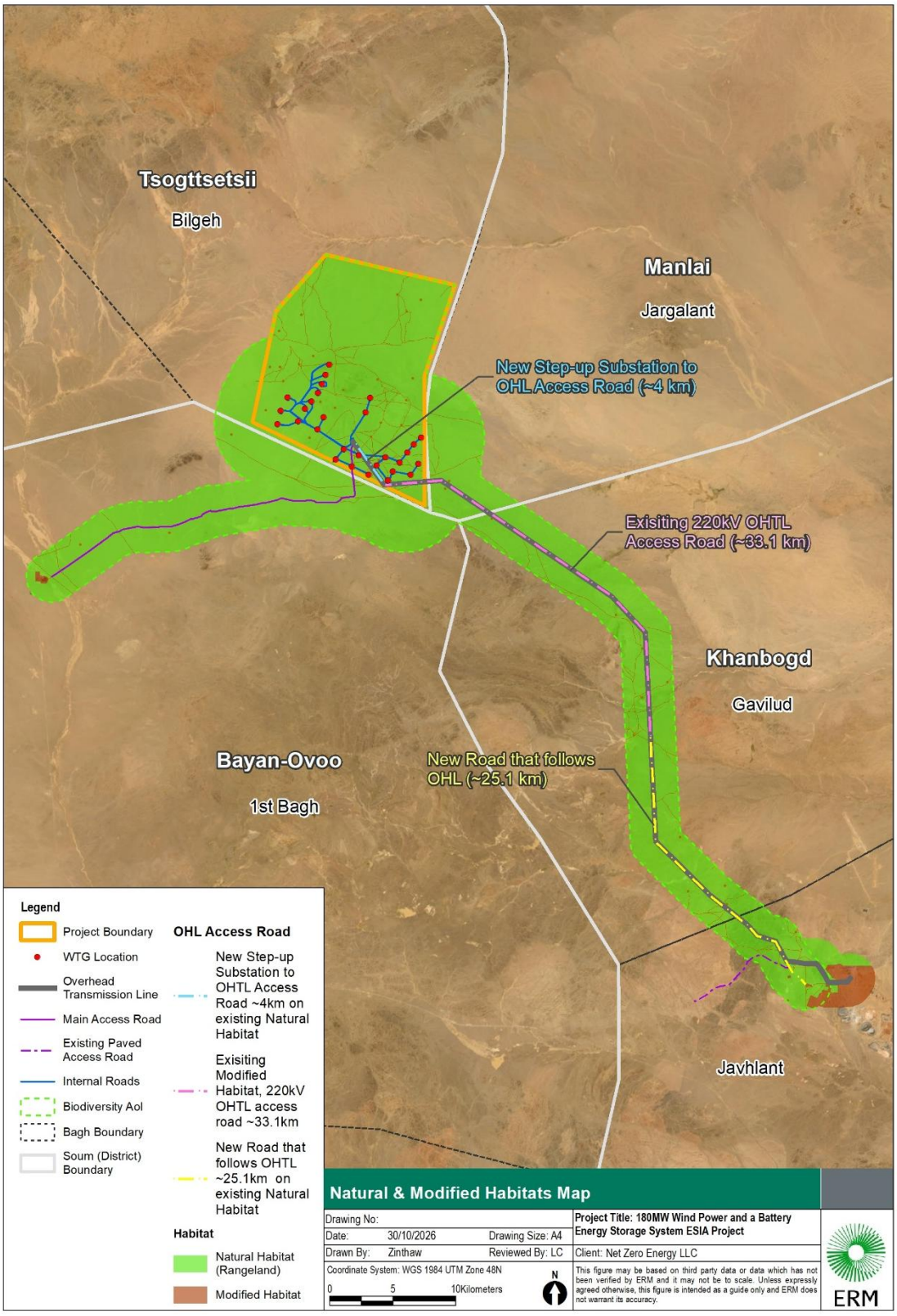


FIGURE F3-1: NATURAL AND MODIFIED HABITATS IN THE BIODIVERSITY AOI

Approximately 141.53 ha of natural and modified habitats in the Project AoI will be affected by the Project (***Table F3-1***), of which a total of 77.78 ha of natural rangeland habitat will be permanently lost due to the construction and installation of permanent Project facilities (***Table F3-2***).

TABLE F3-1: TOTAL AREA OF DISTURBANCE FROM TEMPORARY AND PERMANENT FACILITIES

Project Facility	Facility Type	Habitat Affected	Number	Unit area of foundation (m^2)	Disturbed Area (ha)
WTGs (including foundation)	Permanent	Natural	29	330	0.96
60 x 45m WTG hardstand excluding foundation	Permanent	Natural	29	2,370	6.87
OHL towers	Permanent	Natural and Modified	228	400	9.12
Substation and O&M Building	Permanent	Natural	1	49,920	4.99
Access Road to WTG area (30.9 km length, 8 m width) (only upgrades to existing road, no new construction)	Permanent	Modified	1	247,200	24.72
Internal Roads within 29 WTG area (~56.1 km length, 8 m width)	Permanent	Natural	1	448,800	44.88
Access road along OHL (65 km length, 4 m width), excluding OHL towers foundation area • New Unpaved Section: Step-up Substation to OHL Access Road ~4 km • Existing road to be upgraded: 220kV OHL access road ~33.1 km • New Unpaved Section: that follows OHL ~25.1 km	Permanent	Natural Modified Natural	1 1 1	16,000 132,400 100,400	1.60 13.24 10.04
Photo Voltaic / BESS System	Temporary	Natural	1	11,076	1.11
Camp	Temporary	Natural	1	15,222	1.52

Project Facility	Facility Type	Habitat Affected	Number	Unit area of foundation (m^2)	Disturbed Area (ha)
Concrete Batching Area	Temporary	Natural	1	15,001	1.50
Laydown Area	Temporary	Natural	1	21,030	2.10
Hardstand Parking Area	Temporary	Natural	1	3,816	0.38
Portable Fuel Station	Temporary	Natural	1	400	0.04
Office Facility	Temporary	Natural	1	1,800	0.18
60 x 105 m WTG excavation, crane hardstand and laydown areas	Temporary	Natural	29	6,300	18.27
Total (ha)			**141.53**		

TABLE F3-2: TOTAL AREA OF NATURAL HABITATS AFFECTED BY PERMANENT FACILITIES

Facility	Type	Number	Unit area of foundation (m^2)	Disturbed Area (ha)
WTGs (including foundation)	Permanent	29	330	0.96
60 x 45m WTG hardstand excluding foundation	Permanent	29	2,370	6.87
OHL towers (excluding 17 towers located in OT Mine area i.e. modified habitat)	Permanent	211	400	8.44
Substation and O&M Building	Permanent	1	49,920	4.99
Internal Roads within 29 WTG area (~56.1 km length, 8 m width)	Permanent	1	448,800	44.88
Access road along OHL (65 km length, 4 m width), excluding OHL towers foundation area* • New Unpaved Section: Step-up Substation to OHL Access Road ~4 km • New Unpaved Section: that follows OHL ~25.1 km	Permanent	1 1	16,000 100,400	1.60 10.04
Total			**77.78 ha**	

*Note that the 30.9km access road to the WTG area and 33.1km existing road to be part of the OHL access road are both existing roads that will be upgraded, therefore they are considered to be modified habitat and not included in this table.

109 plant species were recorded during the baseline flora surveys conducted in August 2024 and May 2025, which indicates relatively high species diversity. The majority of these species are assessed as Least Concern or Not Evaluated under the IUCN Red List (2025-2) and the Mongolian Red List (2011). 13 flora species of conservation concern have been identified, including those listed as Very Rare or Rare under the Mongolian Law on Natural Plants, or listed as EN or VU on the Mongolian Red List. No globally threatened flora species (CR, EN or VU on IUCN Red List) were observed during the baseline surveys.

A total of 16,977 birds belonging to 63 species have been identified during avifauna surveys conducted over six periods between August 2024 and May 2025, using a combination of vantage point surveys, transects and point counts, and carcass surveys. The majority of bird species identified during the baseline surveys are not globally or regionally threatened and not legally protected in Mongolia. In total, eight (8) bird species of conservation significance have been recorded in the Project area. Collision risk modelling conducted to simulate bird collision with the Project's wind turbines indicate that the predicted annual collision numbers are very low and not expected to have a significant effect on species' population stability. Cinereous Vulture (*Aegypius monachus*) and Black Kite (*Milvus migrans*) have relatively higher simulated collision rates compared to the other target species assessed in the CRM. The predicted annual collision rates are 2.73 and 2.41 individuals per year, respectively, equivalent to 0.016% and 0.00006% of their respective global populations, indicating a negligible impact. Other modelled species had lower predicted collision rates of 0.85 to 0.007 birds per year.

Potential Biological Removal (PBR) analysis was conducted for CRM target species using local/national/regional population estimates where available (and global population estimates where data gaps exist) to identify fatality thresholds for each target species, as shown in the table below.

TABLE F3-3: ANNUAL FATALITY THRESHOLDS AND PREDICTED WTG COLLISIONS

Species	Basis of threshold	Fatality threshold (birds/yr)	Predicted WTG collisions (birds/yr)
Saker Falcon (*Falco cherrug*)	Global IUCN status EN	0	0.0071 Avoidance rate = 98%
Cinereous Vulture (*Aegypius monachus*)	Declining global trend	0	2.7345 Avoidance rate = 98%
Black Kite (*Milvus migrans*)	PBR 105,326 (> 100,000)	5	2.4124 Avoidance rate = 98%
Lesser Kestrel (*Falco naumanni*)	PBR 10,583 (1,000-100,000)	3	0.2587 Avoidance rate = 98%
Upland Buzzard (*Buteo hemilasius*)	PBR 790 (< 1,000)	0	0.2049 Avoidance rate = 98%
Whooper Swan (*Cygnus cygnus*)	PBR 2,315 (1,000-100,000)	3	0.5694 Avoidance rate = 99.5%
Pallas's Sandgrouse (*Syrrhaptes paradoxus*)	PBR 474,341 (> 100,000)	5	0.8466 Avoidance rate = 98%
Horned Lark (*Eremophila alpestris*)	PBR 6,037 (1,000-100,000)	3	0.7198 Avoidance rate = 98%

Species	Basis of threshold	Fatality threshold (birds/yr)	Predicted WTG collisions (birds/yr)

Note: The default avoidance rate for birds recommended by NatureScot for onshore wind farms is 98.0%, and thus is applied to all species listed above except for Whooper Swan, which NatureScot suggests an avoidance rate of 99.5%.

Only two (2) bat species were observed during the baseline surveys, both of which were only detected through passive acoustic monitoring while no bats were recorded from transects and active search/roost inspection, suggesting very low diversity and abundance in the Project area. Both species, the Parti-coloured Bat (*Vespertilio murinus*) and Gobi Serotine (*Cnephaeus gobiensis,* are classified as LC on the IUCN Red List and Mongolian Red List. Available evidence indicates that it is unlikely for either of these species' populations to be significantly affected by collision risk due to their low abundances in the Project area and/or behavioural characteristics.

17 species of non-volant mammals were recorded during the baseline surveys. Of these, four (4) mammal species of conservation significance were identified, while the rest are considered Least Concern on the IUCN Red List and/or Mongolian Red List. Additionally, the Argali (*Ovis ammon*) (NT, IUCN) was not observed during surveys but herds were reported by interviewed locals to occur in the WTG area.

68 insect species belonging to eight (8) orders were recorded in the surveys, along with three (3) species of reptiles. None of these insects or reptiles are considered to be of conservation significance. In addition, no invasive species have been identified in the Project area during the six baseline survey events.

Lastly, the results of the Critical Habitat Assessment show that there are no Critical Habitat-qualifying biodiversity values for the Project, however there are a total of 27 species that qualify as Priority Biodiversity Features per EBRD ESR6 criteria and thresholds, as summarized below and listed in ***Table F3-4***.

- 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).
- 25 migratory species meet the thresholds for criterion 4(a), i.e. migratory species recorded in the area of impact during baseline surveys, including 21 birds and 4 mammals

considered PBFs in the EAAAs. A number of these species also meet criterion 2(b) and/or criterion 2(c), as mentioned above.[1]

TABLE F3-4: 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	*Milvus migrans*	Black Kite	LC	LC	Criterion 4(a)
8	*Falco naumanni*	Lesser Kestrel	LC	LC	Criterion 4(a)
9	*Cygnus cygnus*	Whooper Swan	LC	LC	Criterion 4(a)
10	*Buteo japonicus*	Eastern Buzzard	LC	NE	Criterion 4(a)
11	*Buteo hemilasius*	Upland Buzzard	LC	NE	Criterion 4(a)
12	*Platalea leucorodia*	Eurasian Spoonbill	LC	LC	Criterion 4(a)
13	*Aquila chrysaetos*	Golden Eagle	LC	LC	Criterion 4(a)
14	*Falco tinnunculus*	Common Kestrel	LC	LC	Criterion 4(a)
15	*Tadorna ferruginea*	Ruddy Shelduck	LC	LC	Criterion 4(a)
16	*Circus cyaneus*	Hen Harrier	LC	LC	Criterion 4(a)
17	*Falco columbarius*	Merlin	LC	LC	Criterion 4(a)
18	*Accipiter nisus*	Eurasian Sparrowhawk	LC	LC	Criterion 4(a)
19	*Falco amurensis*	Amur Falcon	LC	LC	Criterion 4(a)
20	*Pernis ptilorhynchus*	Oriental Honey-buzzard	LC	LC	Criterion 4(a)

[1] Regarding avifauna species considered PBFs under criterion 4(a), these have been identified with reference to the IUCN's guidelines (Bennun et al., 2021) on 'Mitigating Biodiversity Impacts Associated with Solar and Wind Energy Development'[1]. These guidelines identify species most vulnerable to collision with onshore wind turbines and transmission lines, which are (i) large, migratory soaring birds, (ii) species with high wing loading and thus lower manoeuvrability, and (iii) large perching birds. Examples include raptors (eagles, hawks, buzzards, kites, vultures), bustards, cranes, geese, swans, and storks. Therefore, migratory species that fall into the above categories and that were recorded during the biodiversity baseline surveys have been considered as PBFs for the Project under ESR6 criterion 4(a).

No.	Scientific Name	Common Name	IUCN Red List	Mongolian Red List	EBRD ESR6 Criteria
21	*Phalacrocorax carbo*	Great Cormorant	LC	LC	Criterion 4(a)
Mammals					
22	*Equus hemionus*	Asiatic Wild Ass	NT	EN	Criteria 2(c), 4(a)
23	*Gazella subgutturosa*	Goitered Gazelle	VU	VU	Criterion 2(b), 4(a)
24	*Procapra gutturosa*	Mongolian Gazelle	LC	EN	Criteria 2(c), 4(a)
25	*Ovis ammon*	Argali	NT	EN	Criteria 2(c), 4(a)
26	*Vespertilio murinus*	Parti-coloured Bat	LC	LC	Criterion 4(a)
Flora					
27	*Amygdalus mongolica*	-	NE	EN	Criterion 2(c)

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

F4. CONSTRUCTION BIODIVERSITY MANAGEMENT PLAN (BMP)

This Chapter presents the Biodiversity Management Plan (BMP) for the construction phase of the Project, covering mitigation and monitoring measures to address all direct and indirect impacts to habitats, species, ecosystems, and associated ecosystem services that may arise from construction activities.

The construction phase will involve significant ground disturbance and includes both permanent and temporary infrastructure development. Temporary construction components refer to structures and areas used solely during the construction period and will be removed or reinstated to their original condition upon project completion.

The construction BMP aims to ensure that all activities during construction are carried out in a manner that avoids, minimizes, and restores biodiversity impacts where possible, and applies mitigation hierarchy principles throughout. The subsequent sections outline the key risks, management measures, monitoring and reporting requirements, and define roles and responsibilities specific to the construction phase.

F4.1 SUMMARY OF IMPACTS/RISKS TO BIODIVERSITY

Construction related biodiversity impacts, related activities and infrastructure have been conceptualized and discussed in the ESIA and are summarized in the table below.

TABLE F4-1: POTENTIAL IMPACT TO BIODIVERSITY VALUES

Project Activities	Potential Impacts	Receptors
• Workforce mobilisation and presence • Land preparation (site clearance, excavation, and levelling), fencing, and civil works; • Construction of Access Road, internal roads, WTGs foundations, Substation, BESS and Control Building, and OHL; • Equipment and material transportation and supply	• Direct loss of habitat caused by construction of permanent and temporary facilities; • Indirect disturbance to or displacement of fauna caused by construction of facilities, movement of equipment and material, and presence of workforce; • Direct impacts from barrier creation by construction in the WTG Area, OHL, and facilities; • Indirect degradation of habitat from construction of facilities, and transport of equipment and material; • Direct mortality from vehicle collision, hunting, and poaching, from transport of equipment and material transport, and presence of workforce.	• Terrestrial habitats • Flora • Fauna

The ESIA report identified a total of five (5) individual biodiversity impacts associated with the construction phase of the project. These impacts were assessed with a focus on biodiversity receptors (habitats, flora, and fauna species) during the construction phase, specifically evaluating the severity of the impact and the associated risks. Impact severity ranged from minor to moderate; however, following the application of mitigation measures, residual impacts were generally regarded as negligible across all impacts, except for direct loss of terrestrial habitat which has a moderate residual impact due to permanent loss of natural rangeland habitat (see ***Table 4-1*** below).

It should be noted that management of significant residual impacts on biodiversity receptors and strategies for achieving no net loss for natural habitat (rangelands) and Priority Biodiversity Features are presented in the Project's Framework BAP and not repeated here. Nevertheless, mitigation measures to be carried out during the construction stage that would contribute to the Project's no net loss commitments are still presented in this chapter.

TABLE F4-2: SIGNIFICANCE OF CONSTRUCTION-PHASE RESIDUAL IMPACTS ON BIODIVERSITY

No.	Impact	Receptor	Significance of Impact (with embedded measures)	Significance of Residual Impact (after additional mitigations)
1	Direct Loss of Terrestrial Habitat	Habitat	Moderate	Moderate
		Species	Minor	Negligible
2	Indirect Disturbance to or Displacement of Fauna	Species	Minor	Negligible
3	Direct Impacts from Barrier Creation	Species	Minor	Negligible
4	Indirect Degradation of Habitat	Habitats and Species	Negligible to Minor	Negligible
5	Direct Mortality from Vehicle Collision, Hunting and Poaching	Species	Minor	Negligible

F4.2 CONSTRUCTION-PHASE MITIGATION MEASURES

The management and mitigation measures/actions identified in the ESIA for addressing impacts during the construction phase are presented in ***Table F4-3*** and provides the following information:

- **Impact:** The specific biodiversity impact that the mitigation measure(s) relates to.
- **Management/Mitigation Measures:** A description of the management measure/action or mitigation proposed.
- **Responsibility:** The individual or team responsible for implementing the management measure/action
- **KPI (Key Performance Indicator):** A quantitative compliance indicator or qualitative acceptance criteria used to assess the effectiveness of the management measure/action.
- **Timing and Monitoring Frequency:** The timing and frequency for implementing the measure/action; and
- **Reporting Arrangements:** Reporting requirements, format, and frequency.

TABLE F4-3: CONSTRUCTION-PHASE MITIGATION MEASURES FOR BIODIVERSITY

Impact	Mitigation/Management Measure	Responsibility	KPI	Timing	Monitoring Frequency	Reporting
General Biodiversity Management	• Develop the full Biodiversity Action Plan (BAP) for the Project based on the Framework BAP to mitigate residual impacts on natural habitat and PBFs and achieve no net loss of these biodiversity values. The BAP must document all related objectives, management measures, monitoring requirements, implementation arrangements, roles and responsibilities. The BAP should also be developed in consultation with relevant stakeholders such as government entities, external experts, conservation organisations, and affected communities.	Project Proponent & Biodiversity Specialist(s)	• Completed BAP	• Prior to end of construction	• N/A	• As needed with external stakeholders and lenders
General Biodiversity Management	• Develop an Operation-phase BMP prior to the end of construction to capture all embedded controls and all additional mitigation, management, and monitoring measures listed in the ESIA, as well as document the roles and responsibilities of all parties, implementation schedule, and timeline for regular review and update.	Project Proponent & Biodiversity Specialist(s)	• Completed Operation-phase BMP	• Prior to end of construction	• N/A	• As needed with external stakeholders and lenders
Direct Loss of Terrestrial Habitat	Develop and implement a Priority Plant Conservation Plan (PPCP), which should include the following: • Conduct pre-construction surveys targeting flora species prior to the start of any site clearance, earthworks, or land preparation activities. Qualified ecologists must be engaged to carry out such flora surveys and record the presence of any species of conservation significance in areas to be cleared, i.e. globally threatened, legally protected and/or restricted-range/endemic species, including the PBF species *Amygdalus mongolica*. These surveys should be carried out within the footprint of the foundations of WTGs, OHL towers, access roads and other planned temporary and permanent Project facilities. If plant species of conservation significance are found, these individuals must be documented clearly with photographs and georeferenced locations. • Based on the results of the pre-construction flora surveys, undertake micro-siting of all areas to be cleared for access roads, OHL tower foundations, and temporary facilities to avoid removal of flora species of conservation significance that are present in the areas to be cleared, where possible. Where there is limited room for movement of pre-agreed infrastructure locations, the focus will be on identification of opportunities for micro-siting (e.g. movement of infrastructure less than 300 m). Where infrastructure is more location-flexible (e.g. temporary structures like laydown areas, camps), full opportunities will be considered for micro- and larger-scale re-siting of such infrastructure. Micro-siting should be explored fully where there are protected/threatened plant species present that cannot be easily transplanted (e.g. those with fragile root systems). Where full avoidance of areas with flora species of conservation significance is not possible, constraints that make micro-siting impossible (e.g. topography) will be clearly documented. • Where flora of conservation significance are retained on-site and will not be removed, a 50 m exclusion buffer will be established and clearly demarcated using visible signage and flags/markers (and temporary fencing if appropriate) around these individuals. For any flora of conservation significance that are not directly affected by site clearance but are located within 50 m of planned construction works areas, these will also be clearly demarcated and applied an exclusion buffer to avoid accidental clearing. Demarcation shall be maintained throughout construction and reinstated immediately if damaged or displaced. All staff will be informed on the locations of any flora exclusion buffers. • Where construction activities are undertaken near flora exclusion buffers, vehicle and anthropogenic movements must be restricted to approved access routes and stockpiling should be prohibited near buffer boundaries. • For flora of conservation significance where removal cannot be avoided, a Plant Rescue and Translocation Protocol will be developed to transplant these individuals to suitable nearby habitats that are not subject to disturbance, or to on-site areas that will be rehabilitated after construction. Any action to remove and transplant legally protected species must comply with relevant national laws and regulations, such as payment of fees and/or obtaining relevant permits or licences, and will be subject to the relevant authority/ies' decisions.	Project Proponent/ EPC Contractor & Biodiversity Specialist(s)	• Completion of PPCP prior to start of construction • Completion of pre-construction flora surveys • Completion of micro-siting • Establishment and visual inspection of exclusion buffers for flora species retained on-site • Completion of PRTP • Completion and monitoring of translocated flora species	• Prior to start of construction	• Weekly checks and progress reporting • Monthly progress reporting of PPCP implementation • Quarterly monitoring of PRTP implementation	• Priority Plant Conservation Plan • Plant Rescue and Translocation Protocol • Habitat Rehabilitation Plan • Monthly/ Quarterly HSEQ Report

Impact	Mitigation/Management Measure	Responsibility	KPI	Timing	Monitoring Frequency	Reporting
	• All individuals that are retained on-site or translocated should be monitored for survival rate for at least three years. • For flora of conservation significance where removal is unavoidable and translocation is not feasible, compensatory planting must be undertaken for cleared individuals.					
	Access restriction and demarcation: • Areas planned for vegetation clearance shall be clearly determined and demarcated to avoid accidental clearing. • Limit clearance of vegetation to the Project footprint only. Monitor habitat clearance closely during construction to minimise risk of inadvertent additional clearing. Where feasible, vegetation should be cut to ground level rather than completely stripped to preserve soil and seed banks. • Restrict all construction activities including soil stripping, vegetation clearing, earthworks, access road construction, grading, etc. to the footprint of individual facilities only and as per the approved construction plan. • Implement a procedure prohibiting vehicles to travel on unapproved routes during construction phase. • During the construction phase, movement of vehicles will be prohibited outside of 100-meter corridor from the OHL and approved routes will be strictly followed.	Project Proponent / EPC Contractor	• Regular compliance checks (site inspections and record keeping) along all demarcated boundaries, and implementation of corrective actions in cases of non-compliance. • Training records (including attendance and content). • Records of non-compliances to Project rules and protocols are to be kept and regularly updated. Corrective actions to non-compliances to be undertaken immediately.	• Before and during construction	• Daily checks of non-compliance • Immediate conduct of any necessary corrective actions • Monthly reporting during construction • Quarterly training •	• Daily Inspection Check List • Ad hoc Incident/ Corrective Actions Report • Monthly HSEQ Report
	Develop and implement a post-construction Habitat Rehabilitation Plan (HRP) for temporary areas used during construction (e.g. storage, laydown, and crane installation areas). The HRP should be prepared by qualified ecologists prior to the end of construction and integrated into the Project's Biodiversity Management Plan or developed as a standalone plan to be implemented in conjunction with the BMP. The HRP should evaluate options for passive natural recovery and/or active/assisted restoration (or a combination of the two), depending on the habitat type characteristics and known responses from literature/case-study examples. This Plan should also include all related embedded measures in the DEIA, as well as the following (at minimum): • Following the dismantling/decommissioning of temporary areas/facilities utilised during construction (e.g. temporary laydown areas, storage areas, etc.), post-construction habitat restoration and revegetation should be carried out in all disturbed areas using native flora species. All habitat restoration and planting methodologies to be used, native species to be planted, adaptive management measures, monitoring requirements, roles and responsibilities, and implementation timeline should be clearly documented in the HRP. • Compensatory planting for any flora of conservation significance that are removed to be carried out as part of habitat rehabilitation activities. • Embedded measure includes habitat rehabilitation and revegetation for "areas impacted by waste and newly created roads". Adjacent areas affected by construction works as well as areas affected by installation works during the construction phase should also be rehabilitated in accordance with the surrounding land surface and create conditions for plant growth. • Topsoil stripped from all construction areas will be temporarily stored separately from other soils and excavated materials will be used for the rehabilitation of temporary roads used during construction phase and other suitable locations. • Topsoil removed from the construction area of WTGs and OHL poles will be used for rehabilitation of nearby landscape, while lower level soils and rocks removed will be used for permanent backfill of BESS/substation. • Maintain the original soil layering and do not mix topsoil and subsoil layers. Reinstate soils in the reverse order (subsoil, then topsoil). Protect the reinstated bare soil surface with a physical barrier, such as a thin layer of mulch or geotextile/erosion control matting. • All disturbed soil surfaces will be stabilized using temporary cover crops during construction. Long-term stabilization is to occur using a mix of species native to the area and suitable to local soil and climate characteristics to stabilise disturbed	Project Proponent / EPC Contractor & Biodiversity Specialist(s)	• Completion of HRP • Monitoring of habitat rehabilitation and revegetation progress and success/failure, including regular inspections to determine plant establishment. Where plant establishment has failed, corrective action is to occur.	• During construction	• Quarterly	• Monthly/ Quarterly HSEQ Report

Impact	Mitigation/Management Measure	Responsibility	KPI	Timing	Monitoring Frequency	Reporting
	soil surfaces. All stabilized areas are to be monitored and maintained following construction activities. • Avoid compaction of soils, for example though excessive vehicle tracking, and rip soils where compacted to allow for vegetation growth. • Identify indigenous species for planting and suitable sources for seed and plants as appropriate (preferably using seed of local origin as far as possible, and only supplement with other seed where locally sourced seed is unavailable). • Temporary fencing or other appropriate barriers should be installed where necessary in the short- to medium-term to prevent entry to the area and potential livestock overgrazing, allowing for vegetation regrowth and soil stabilization.					

Indirect Disturbance to or Displacement of Fauna	• Pre-clearance surveys targeting fauna (including birds, bats, non-volant mammals, and herpetofauna) should be undertaken prior to any vegetation clearance, earthworks or ground disturbance. Surveys must include checks for active nests, burrows, roosts, breeding activity, and presence of any PBF fauna species and/or species of conservation significance. Any individuals found should be gently relocated to nearby suitable habitat to ensure their protection from construction-related impacts, in accordance with a Wildlife Shepherding Protocol (see ***Appendix A***).
	• Vegetation clearance and ground disturbance activities will be planned to avoid sensitive breeding, nesting and roosting periods, whenever feasible.
	• During the construction phase, movement of vehicles will be prohibited outside of 100 m corridor from the OHL and approved routes will be strictly followed.
	• Vehicle noise levels will not exceed the level specified under Mongolian standards for noise and vibration. Low-noise emitting motorized equipment (for construction) will be selected. Other mitigation measures related to noise as detailed should be followed.
	• In case working night shifts is needed, work will be planned to comply with night-time noise level limits, and vehicle movement/operation should be restricted during nighttime to limit risk of impact to fauna due to visibility issues.
	• Construction vehicles and equipment will be registered, permitted and meet emission standard established as per regulation requirements.
	• Where possible, lighting should not be active during nighttime. Where lighting is required, it should not be directed towards areas likely to contain native fauna.
	• Use appropriate lighting that minimizes ecological effects on wildlife and limits attraction of insects, e.g. using long wavelength light (warm white, orange, red, and infra-red) and low intensity lights where possible.
	• Invasive species have the potential to enter or exit the Project Site via transportation of equipment, and materials. In order to avoid/minimize the introduction of invasive fauna species, a suitable Invasive Species Management Plan (ISMP) should be prepared to prevent the introduction of invasive species and to respond accordingly if such introduction occurs. The plan should include (but not be limited to) the following mitigations:
	  ○ Source goods and materials locally where possible (including topsoil removed as part of construction works);
	  ○ Prohibit the general access of vehicles, construction workers and machinery and storing of soils to rangelands outside of the construction zone and approved access routes to avoid the dispersion of invasive alien species within these habitats;
	  ○ Clean boots prior to entering the Project site, and use vehicle pressure-wash down procedures to reduce the transmission of invasive species into and from the Project Site, including washing of vehicle tires and underbody to remove seeds of invasive plants;
	  ○ Use only certified pest-free stock where possible; and
	  ○ Control any small infestations early and appropriately, to avoid spreading infestation.
		EPC Contractor & Biodiversity Specialist(s)	• Site inspections and record keeping to monitor implementation of mitigation measures
			• Completion and monitoring of Invasive Species Mangement Plan (ISMP)
				• Pre-clearance surveys to be done before construction
				• Visual inspections of other mitigations to be done during construction
					• Monthly monitoring of all mitigation measures
					• Monitoring frequency for invasive species to be defined in ISMP
						• Monthly HSEQ

Impact	Mitigation/Management Measure	Responsibility	KPI	Timing	Monitoring Frequency	Reporting
Indirect Degradation of Habitat	• Dust management measures are the same as those outlined for 'Air (Fugitive Dust Emissions)' in ESIA Chapter 11 (ESMP), particularly that all machinery and handheld equipment must comply with required air emission standards. • Management measures for release of contaminants are the same as those outlined for 'Water Resources (Potential Impact on Water Quality)' and 'Soil (Potential Impact to Soil)' in ESIA Chapter 11 (ESMP). • Leak and spillage mitigation measures for avoiding accidental leaks are the same as those for 'Unplanned Events' in ESIA Chapter 11 (ESMP).	EPC Contractor	• Monitoring as defined by each respective section.	• During construction	• Frequency as defined by each respective section.	• Monthly/ Quarterly HSEQ
Direct Impacts from Barrier Creation	Implement all mitigations listed above and the following additional measure: • All temporary construction features, such as excavations, fencing, and stockpiles of soil or materials, must be fully removed upon completion of construction to enable natural habitat recovery and reduce long-term barriers to species movement. • Utilize native flora as natural fencing instead of artificial barriers, where possible.	EPC Contractor & Biodiversity Specialist(s)	• Visual inspection of implementation • Temporary barriers removed after end of construction	• Post-construction	• Quarterly	• Monthly/ Quarterly HSEQ Report
Direct Mortality Impacts from Vehicle Collision, Hunting, and Poaching	• All vehicles are to maintain a speed of a maximum of 30 km/hr within construction work areas to reduce the risk of fauna strikes. The speed limit may be revised upon further review with a wildlife expert, as necessary. • All off-road driving and use of any non-approved access roads are strictly prohibited. • Prior to starting construction work, the area will be checked for presence of fauna along tracks and in work areas, to reduce the likelihood of vehicle collision. • Provide training to staff and workers on biodiversity awareness (including on fauna species of conservation significance in the Project area), as well as all rules, regulations and information concerning prohibitions on hunting, poaching, and collection of species, and the punishment that can be expected if any staff or worker or other person associated with the Project violates rules and regulations. • Install wildlife warning signs at regular intervals along all internal roads and access roads.	EPC Contractor	• Site inspections and record keeping to monitor implementation of mitigation measures • Site inspections and record keeping of incidents related to fauna. • Training records (including attendance and content). • Records of non-compliances to Project rules and protocols are to be kept and regularly updated. Corrective actions to non-compliances to be undertaken immediately.	• During construction	• Monthly monitoring of all mitigation measures • Quarterly training • Daily checks of non-compliance	• Daily Inspection Check List • Ad hoc Incident/ Corrective Actions Report • Monthly/ Quarterly HSEQ Report

F4.3 CONSTRUCTION-PHASE MONITORING

Table F4-4 outlines the monitoring plan and program for monitoring of the implementation of the biodiversity management and mitigation measures in ***Table F4-3***, for the construction phase. This excludes the operational phase which will be included in the Operation-phase BMP to be developed prior to the end of construction.

The purpose of these monitoring activities is to ensure that residual impacts are controlled and that the mitigation measures/actions have been effective in terms of their implementation and to advise on any changes or adaptive measures necessary.

For each monitoring activity listed, the table provides the following information:

- **Impact:** The specific biodiversity impact that the mitigation measure(s) relates to.
- **Monitoring measure**: The monitoring activity and measure used to quantify that the KPI / target has been achieved.
- **Monitoring parameters:** Regulatory limit values or qualitative acceptance criteria to be met, and measurement metrics.
- **Timeline/Frequency**: When monitoring will take place and how often will the monitoring activity take place.
- **Responsibility:** The person or team responsible for conducting the monitoring activity.

TABLE F4-4: CONSTRUCTION-PHASE MONITORING REQUIREMENTS FOR BIODIVERSITY

Impact	Monitoring Measure	Monitoring Parameters	Timeline/Frequency	Responsibility
Direct Loss of Terrestrial Habitat	• Completion of all pre-construction flora and fauna surveys prior to start of construction works. • Regular (weekly) checks and progress reporting for Priority Plant Conservation Plan (PPCP) and micro-siting activities. • Completion of species-specific translocation prior to vegetation clearance. • All construction works areas are demarcated and flora exclusion buffers established.	• Records of number of surveys completed. • Records of plants retained-onsite, plants transplanted, and species planted for habitat rehabilitation. • Percentage of works areas and flora exclusion buffers demarcated prior to construction	• Before construction	• NZE/ EPC Contractor / Biodiversity Specialist(s)
Direct Loss of Terrestrial Habitat	• Regular (weekly) checks during construction are to occur along all construction site boundaries to ensure compliance with clearing within marked boundaries. • Records of non-compliance and corrective actions are to be kept and regularly reviewed (quarterly) for implementation of all specified mitigations and the workforce training program for fauna/flora awareness. • Quarterly monitoring of Priority Plant Conservation Plan, including regular inspections of survival rate of all species retained on-site by competent ecologists. Implement corrective actions as necessary. • Quarterly monitoring of Plant Rescue and Translocation Protocol (PRTP), including regular	• Records of non-compliances • Records of training sessions (number of attendees and content). • Implementation progress of PPCP, PRTP, and HRP. • Records of species planted for habitat rehabilitation. • Plant establishment and survival rate of retained/ rehabilitated/ revegetated areas and transplanted individuals.	• During construction	• NZE/ EPC Contractor / Biodiversity Specialist(s)

Impact	Monitoring Measure	Monitoring Parameters	Timeline/Frequency	Responsibility
	inspections of survival rate of all relocated species by competent ecologists to determine plant establishment. Implement corrective actions if survival rates fall below a minimum threshold (to be defined in PRTP). • Quarterly monitoring of Habitat Rehabilitation Plan, including regular inspections by competent ecologists of rehabilitation success/failure and survival rate of planted species. Implement corrective actions if survival rates fall below a minimum threshold (to be defined in HRP).			
Direct Loss of Terrestrial Habitat	• 100% of temporary works areas and facilities have been decommissioned and removed following end of construction. • Post-construction habitat reinstatement completed to a suitable standard (e.g. surfaces stabilized with no evidence of erosion).	• Extent (area) of temporary works removed • Soil/slope stabilization and percentage vegetation cover	• Once, after completion of construction • Once, within 2 months of completion of construction	• NZE/EPC Contractor
Direct Loss of Terrestrial Habitat	• 100% native plant species used for habitat restoration • Success of habitat restoration sites	• Percentage of native plant species compared to exotic/introduced species in restored areas • Species survival and colonization rates (%) and habitat quality/condition post-restoration compared to baseline	• After completion of construction, semi-annually for 3 years	• NZE/EPC Contractor/ Biodiversity Specialists
Indirect Disturbance to or Displacement of Fauna	• Monthly monitoring of implementation of mitigation measures related to this aspect. • Invasive species monitoring.	• Records of non-compliances. • Presence and extent of invasive species.	• During construction	• NZE/EPC Contractor

Impact	Monitoring Measure	Monitoring Parameters	Timeline/Frequency	Responsibility
Direct Impacts from Barrier Creation	• Quarterly faunal monitoring surveys and visual assessment of open areas	• Fauna species' abundance and distribution in the Project AoI. • Documentation of extent of barrier creation effect.	• Quarterly during construction	• NZE/ Biodiversity Specialist(s)
Indirect Degradation of Habitat	• Quarterly monitoring of flora species and vegetation cover, and fauna. • Invasive species monitoring.	• Flora and fauna species' abundance, diversity, and distribution in the Project AoI. • Presence and extent of invasive species.	• Quarterly during construction	• NZE/EPC Contractor/ Biodiversity Specialist(s)
Direct Mortality Impacts from Vehicle Collision, Hunting and Poaching	Visual inspection and reporting of fauna-related hunting, poaching, and collision incidents and accidents.	• Fauna incidence register, including date, species number of individuals, nature of event, and nature of injuries/fatalities.	• Document immediately upon reported incidents. • Compile reports and update register monthly.	• NZE/EPC Contractor

F4.4 ROLES AND RESPONSIBILITIES

The ultimate responsibility for implementing the construction phase BMP rests with the developer, however specific technical tasks and measures will be delegated to the EPC Contractor and any relevant subcontractors, as well as independent experts likely to be involved in BMP implementation and monitoring. Key roles and responsibilities are outlined in the able below for the construction phase.

TABLE F4-5: ROLES AND RESPONSIBILITIES FOR CONSTRUCTION-PHASE BIODIVERSITY MANAGEMENT

Role	Overall Responsibilities	Specific Responsibilities
Construction Site Manager	• Ensure qualified personnel and resources are allocated for the implementation of the Construction Phase BMP. • Approve sub-plans, procedures, and contractor selections related to biodiversity management.	• Final approval of the Construction Phase BMP and relevant subcontractor plans. • Act on major non-conformities based on Health and Safety • Manager / Environmental Solution Partner input and monitoring outcomes. • Oversee implementation of corrective actions when needed.
Health and Safety Manager	• Ensuring that the BMP is kept up to date and appropriate to the nature and scale of the Project • Ensuring that the BMP is implemented effectively. • Collecting, organizing and reviewing monitoring data and performance monitoring reports provided by the specialized contractor(s) and providing summary results of such reports to Management, to stakeholders and to the Lenders.	• Ensuring that action/measures and monitoring activities directly under NZE responsibilities are carried out timely and adequately according to this Management Plan requirements. • Addressing Non-Conformances through the definition of Preventive/Corrective actions proposing to Management, if necessary, amendments and/or updates to this Management Plan and issuing plan revisions. • Bringing major Non-Conformances immediately to the attention of Management.
EPC Contractor and Subcontractors	• Effective execution of the specific tasks assigned in conformity with the BMP and with contractual arrangements. • Respect of EHS requirements. • Agree with the timing and logistics of the monitoring activities.	• Provide relevant monitoring data and monitoring reports to as indicated in this plan. • May propose changes and integrations to the monitoring activities included in the Management Plan. The proposed changes shall be evaluated and approved by HSE and Sustainability Manager and by Management.
All Employees and Contractors	• Comply with environmental management requirements. • Report any activities which are causing unnecessary biodiversity issues.	• Give evidence that the relevant mitigation measures identified in the current biodiversity management plan are being properly considered, implemented and monitored during execution of the works.

Role	Overall Responsibilities	Specific Responsibilities
Biodiversity Specialists	• Consulted/engaged on an ad hoc basis as required to assist with implementing key measures of BMP.	• Support with implementing plans and programs according to the BMP. • Assist with developing supporting plans and protocols. • Onsite training and implementation of the BMP and supporting plans and protocols. • Ad hoc support on-site or remotely as necessary.

F4.5 COMPLIANCE AND REVIEW

The Corporate Biodiversity Specialist (CBS) leads all on-site biodiversity activities (monitoring, mitigation, protection) with the contracted Biodiversity Consultant. During construction, the Consultant submits monthly progress reports to the CBS. The Biodiversity Management Plan (BMP) is adaptive and will be updated by the CBS based on site findings. Where required, a Biodiversity Action Plan (BAP) will be prepared and, once issued, it will also be updated adaptively.

All near misses, incidents and non-compliances are entered in the Biodiversity Incident and Action Log within the adaptive BMP. Required measures are defined using the controls and methods already set out in the BMP and—if issued—the BAP; responsibilities and target dates are recorded. The CBS verifies implementation and may require temporary suspension of relevant activities until controls are effective. Once closed, the BMP/BAP is updated and re-issued.

TABLE F4-6: COMPLIANCE REVIEW TASKS

Task	Description
Site Inspections	• The Biodiversity Consultant conducts routine inspections and monitoring in line with the BMP and keeps written records on site and in the project archive. • Daily visual checks are undertaken on active work areas to confirm the integrity of no-go areas/buffers and the effectiveness of biodiversity controls specified in the BMP. • Monthly CBS reviews are carried out during construction to evaluate monitoring results against the KPIs in Section 4.4 and to issue BMP/BAP updates where needed.
Biodiversity Compliance	The following definitions shall apply in relation to the classification of Biodiversity Occurrences during construction phase: • **Biodiversity Near Miss**: An occurrence that, if not controlled, could affect • protected/priority species or habitats. • **Biodiversity Incident**: An occurrence that results in actual impact on protected/priority species or habitats. • **Biodiversity Non-Compliance**: A deviation from BMP/BAP requirements or approved ecological methods.
Auditing	• Internal monthly audits and external bi-monthly audits are undertaken during construction. • Audits follow protocols aligned with the BMP and include field verification and review of monitoring data. Findings are communicated to Project management. • A final close-out audit is conducted within one month of completing construction activities. Any required updates are incorporated into the BMP/BAP.

F4.5.1 REPORTING REQUIREMENTS

The following reporting requirements apply for the EPC Contractor:

- Incident reporting;
- Emergency response reporting;
- Records of annual emergency response training exercises;
- Biannual reports on KPIs and performance trends;
- Monthly reports of relevant training activities completed and attendance registers to be maintained;
- Daily/Weekly/Monthly reports of site inspection activities;
- Audit reports; and
- Inspection logs and status of non-compliances.

F4.5.2 RECORD KEEPING AND DOCUMENT CONTROL

A record-keeping system shall be used to control all records and documents so that they are:

- Easy to retrieve and identify and are maintained in an orderly fashion;
- Current, accurate, legible, and dated, and that the dates should include revision dates when appropriate;
- Relevant/applicable and satisfy regulatory and/or legislative requirements; and
- Retained for a specified time period – Retention of records may be regulated by legislative or regulatory policies.

Records are to be kept of all required activities and incidents, which must be readily available for inspection at any time and which are to include the following:

- All permits and licenses;
- Register of relevant environmental legislation;
- Register of relevant environmental consents;
- All incidents reported;
- Internal and external audit reports and corrective action plans;
- Site inspection reports;
- Monitoring reports;
- Records of successful and unsuccessful implementation of mitigation measures;
- Site inductions;
- Training records;
- Tool box meetings and other training records of attendance; and
- MSDS (Material Safety Data Sheets).

The construction BMP will be regularly reviewed and updated by the E&S Officer/CBS after any change in the context in which the Project operates during the construction phase. Urgent updates in line with the principle of 'adaptive management' can be the responsibility of the E&S Officer/CBS, however any material changes to intervention design, the timing of monitoring activities, etc. should be made in consultation with a third-party consultant to ensure accountability.

Any and all changes made to the BMP will be made in the master document and revision numbers and dates provided to track version numbers as part of the EPC Contractor's data and document management system. A summary document should also be produced that summarizes the important changes made to the document for the different version numbers and who authorized these changes. A copy of the documents / folders shall be kept at the Site offices for the duration of the works and will be available at all times for review.

F5. SUPPLEMENTARY/COMPLEMENTARY PLANS

The Construction BMP has highlighted a number of complementary and supplementary plans or programs required to implement the necessary management actions for the construction phase. Specifically, these are identified in ***Table F5-1***.

The plans and programs are indicated in ***Table F5-1***, together with recommended timeframes to develop these.

TABLE F5-1: SUPPLEMENTARY PLANS

No.	Plan/Programme	Relevance	Project Phase	Status	Timeframe for Development
Supplementary Plans to Construction BMP					
2	Priority Plant Conservation Plan, including Pre-construction Flora Survey Programme and Plant Rescue and Translocation Protocol	Plan to manage/conserve flora of conservation significance (PBF species *Amygdalus mongolica* and any other conservation-important flora identified during pre-construction surveys).	Pre-construction and Construction	Not yet developed	To be completed before start of construction.
3	Pre-Construction Wildlife Survey Programme	Programme and schedule to inform pre-clearance fauna surveys.	Pre-construction	Not yet developed	To be completed before start of construction.
4	Invasive Species Management Plan	Control and management of potential introduction or proliferation of invasive alien species.	Construction	Not yet developed	To be completed before start of construction.
5	Monitoring Protocols for Species	Protocols to monitor species and populations during and after construction to inform adaptive management	Construction	Not yet developed	To be completed before start of construction.
6	Habitat Rehabilitation Plan	Plan to inform on-site habitat restoration post-construction.	Post-construction	Not yet developed	During construction, to be completed prior to end of construction.
Complementary Plans					
7	Operation-phase BMP, including Bird and Bat Adaptive Management, Post-Construction Fatality Monitoring (PCFM)	BMP documenting all operation-phase mitigation, management and monitoring measures along with roles and responsibilities. Monitoring and adaptive	Operation	Not yet developed	To be completed prior to end of construction.

No.	Plan/Programme	Relevance	Project Phase	Status	Timeframe for Development
	Programme and Shutdown on Demand (SDOD) Protocol	management for avifauna (birds) and bats during operation, including fatality threshold setting, PCFM programme and schedule, and adaptive measures.			
8	Biodiversity Offset Feasibility Study	Investigate feasibility of offsets and identify potential offset sites. Document overall strategy to achieve NNL of natural habitats and PBFs.	Post-construction	Not yet developed	To be completed prior to end of construction.
9	Biodiversity Offset Management Plan (BOMP)	Biodiversity offset implementation plan, including management and monitoring requirements.	Post-construction	Not yet developed	To be completed prior to end of construction.
11	Full Biodiversity Action Plan	Full BAP to be developed based on Framework BAP, results of Offset Feasibility Study, BOMP and BBAMP. Can be regularly updated as key deliverables informing the BAP are completed.	Post-Construction	Not yet developed	To be completed prior to end of construction.

APPENDIX A WILDLIFE SHEPHERDING PROTOCOL

The main purpose of this protocol is to assist with the handling and shepherding of wildlife that may interact with the construction site during the construction phase of the wind power plant project. There are many situations where it may be necessary to restrain and handle wildlife by hand and many species of animals are capable of inflicting serious injury to themselves or those handling them, therefore it is of the utmost importance that handlers be familiar with the correct handling and restraint techniques during the transfer of animals away from the construction site, where necessary.

This protocol has been based largely on the following documents:

- Ottawa, 2015. Protocol for wildlife protection during construction. August 2015. Available online at: Protocol for Wildlife Protection during Construction (ottawa.ca)
- WCS, 2021. Guidelines for the safe handling of wildlife and wildlife products during counter-wildlife trafficking enforcement operations in Asia. January 2021. Available online at: Microsoft Word - Enforcement operations wildlife safety guidelines 20.11.2021.docx (cites.org)
- WWF, 2021. Translocations and animal handling. September 2021. Available online at: network standard en translocations animal handling vsep2021.pdf (panda.org)
- CH2M Hill Engineers Inc., 2017. Wildlife Handling Guidelines. December 2017. Available online at: wildlife handling guidelines.pdf (ca.gov)
- Department of Biodiversity, Conservation and Attractions, 2017. Standard Operating Procedure: Hand restraint of wildlife. Government of Western Australia. Version 1.1. October 2017. Available online at: https://www.dbca.wa.gov.au/

General Guidelines on Wildlife Encounters

- Do not harm any wildlife.
- Stop work immediately if any protected or threatened species are seen in or near the work site. Take a photograph, if possible, to confirm the sighting, and contact the E&S Officer/CBS (biologist/ecologist).
- Make sure to maintain a safe distance from the animal and encourage it to move away from the work area with loud noises, arm waving, clapping, or a push broom. Contact the E&S Officer/CBS or a veterinarian for assistance if needed.
- Construction staff should refrain from handling or attempting to contain wildlife unless the animal is in immediate danger or injured and cannot be rescued by trained personnel.
- However, it is probable that wildlife will be encountered during the construction process at some stage. After dark, the wildlife may come back to the area in search of the habitat that once existed. By managing the site correctly, it will lessen the likelihood of wild animals re-entering, and daily checks of the site before commencing any activity will reduce the possibility of injury to any creatures that have strayed in during the night.
- Animals should always be approached in a calm and quiet manner.

- If an animal is entrapped, measures shall be taken to free the animal if feasible or work with construction crews to free the animal while complying with Project safety regulations, and released a safe distance away from the Project into appropriate habitat.
- If injured or orphaned wildlife are encountered and cannot be handled safely by construction staff or ecologists, cases should immediately be reported to the relevant authorities.

Handling Wildlife

- If the animal cannot be easily freed, or the animal is too large or dangerous for monitors to handle, construction staff shall contact and work with animal control or other qualified party to obtain assistance for the animal as soon as possible.
- Entrapped and/or released wildlife shall be documented in daily monitoring reports.
- Hand restraint is stressful for animals and so it is essential that handling time is kept to a minimum. Animals should be transferred into holding bags as soon as possible.
- The handler must know where and how to grasp the animal. When restraining an animal by hand, the force applied and technique should be appropriate for the species in question. The animal needs to be grasped firmly enough to prevent struggling, but gently enough to avoid the risk of suffocation or damaging limbs.
- Handling animals does not always go as planned so it is necessary to be sensitive, responsive and adaptable. Prolonged, stressful restraint should not be performed and signs of stress should be considered (see ***Table A-1***). Other forms of restraint (e.g. anaesthesia) may then become more suitable to help prevent injury to the animal and handler.

TABLE FA-1: TYPICAL SIGNS OF ANIMAL STRESS

Taxa	Signs of Stress
Birds	Vocalisation, excessive struggling, defecation, increase in heart rate, and panting/heat stress.
Reptiles and Amphibians	Excessive struggling, gaping of the mouth, "swimming" in the air, panting/heat stress and self-biting.
Mammals	Vocalisation, clenching of teeth, self-biting, attempts to escape, increase in heart rate, panting/heat stress, animal is limp or closes its eyes, aggression, urination or defecation, excessive struggling, and cyanosis (bluing) of the noise/lips.

- When capturing/relocating animals, cover larger animals with a towel or blanket and place in a cardboard box and/or hessian bag, place smaller animals in a cotton bag, tied at the top.
- After removal of the individuals from the construction zone, the area that will be disturbed adjacent to natural habitats during construction and at project specific locations should be fenced off appropriately to exclude re-entry by wildlife.
- Where encountered, reptiles and amphibians will be collected prior to construction and moved to a suitable natural habitat outside of the construction area by suitably trained and experience staff, far enough away from the construction zone to limit the chance of them immediately re-entering the construction area.

- When provoked, snakes typically will seek refuge or attempt to flee, only resorting to defending themselves when they have no other option. If a snake is found in the work area, it should be gently herded out to a safe location. Species considered to be dangerous or poisonous/venomous (such as snakes) are to be handled by experienced and trained professionals only.
- Where encountered, reptiles and amphibians will be collected prior to construction and moved to a suitable natural habitat outside of the construction area by suitably trained and experience staff, far enough away from the construction zone to limit the chance of them immediately re-entering the construction area.
- When provoked, snakes typically will seek refuge or attempt to flee, only resorting to defending themselves when they have no other option. If a snake is found in the work area, it should be gently herded out to a safe location. Species considered to be dangerous or poisonous/venomous (such as snakes) are to be handled by experienced and trained professionals only.
- Assess the animal to determine the most suitable hand restraint method (see table 6 2). Determining the most suitable hand restraint method for a species will depend on a number of factors.
- A post-clearing report from the ecologist must be compiled that records the details of key actions taken and details of the species, sex, age, general health and numbers removed/relocated, the date, the relocation areas selected and estimated effectiveness and success of rescue and relocation efforts as well as any complications and further recommendations.
- Approved methods to be used include:
    - **One-handed hold**, which is suitable for small birds, amphibians, small to medium lizards, small bats, small rodents and small mammals. It involves the whole animal being restrained in a single hand, using the thumb and index finger to restrain the head.
    - **Two-handed hold**, which is most suitable for any medium-sized animal. Both hands are used to hold the animal, usually one to restrain the head and the other to support the body and control the legs/tail. The head is held away from the body, and particularly the face, of the handler.
    - **Three-finger hold**, suitable for small to medium mammals, reptiles and birds. It is used to restrain the head of an animal and can be useful for poisonous/venomous snakes for example. The thumb and middle finger are placed on either side of the head and the index finger placed on top of the head.
    - **Pistol grip**, is a variation of the three finger hold and is suitable for small to medium mammals and is useful for pacifying agitated animals. The ring and little fingers are placed under the chin, with the middle and index finger going over the head to cover the eyes and the thumb going behind the head to restrict head movement. This is best done while the animal is still in the bag and then exposing the head once the animal is restrained. For smaller animals, just the index finger over the head is adequate to cover the eyes.
    - **Tail grab**, suitable for macropods, snakes (caution is required with certain venomous and large muscular snakes), large lizards (with caution to avoid tails breaking off) and

medium/large mammals. It involves grabbing the base of the tail where it is thick and muscular and lifting the animal off the ground directing the legs away from the handler. The animal can then be placed into an appropriate handling bag. The animal should not be restrained in this manner for extended periods of time without supporting the body. Care should be taken to minimise the risk of spinal injury when using this technique. DO NOT use this hold for rodents as it may cause detachment of the tail sheath.

- **Scruffing**, is suitable for small to medium rodents and small mammals. Using the thumb and index finger, the loose skin on the scruff of the neck is grasped. For medium sized animals the other hand is required to support the body. This technique is not suitable for species with delicate skin.
- **Cupping**, is suitable for most small birds, amphibians, small to medium lizards, small bats and small rodents. It involves the whole animal being enclosed in one or two hands. Not suitable for species that may bite, sting or scratch hands.
- **Ringers hold**, is suitable for small birds and can also be used on small rodents and mammals. This is generally a one-handed bird restraint method which involves the animal being caged in the fingers with the head protruding between the thumb and index finger or between the index finger and middle finger. The non-dominant hand is usually used to hold the animal.
- **Reverse ringers hold**, is suitable for small birds, but only for those that do not have sharp beaks as the head is not properly restrained. It is a one-handed bird restraint method in which the bird is grasped with its back and closed wings against the palm of the hand, with the head facing downward towards the handler's wrist.

TABLE FA-2: SUITABLE WILDLIFE HANDLING METHODS

Animal Group	One-handed hold	Two-handed hold	Three-finger hold	Pistol grip	Tail grab	Scruffing	Cupping	Ringers hold	Reverse ringers hold
Birds	✓(small)	✓(medium to large)	✓	X	X	X	✓(small)	✓(small)	✓(small)
Amphibians	✓	✓	X	X	X	X	✓	X	X
Snakes	X	✓	✓	X	✓	X	X	X	X
Lizards	✓ (small to medium)	✓	✓(small to medium)	X	✓(large)	X	✓(small)	X	X
Crocodiles	X	✓	X	X	✓	X	X	X	X
Turtles	X	✓	X	X	X	X	X	X	X
Bats	✓(small)	✓(medium to large)	✓	X	X	X	✓(small)	X	X
Macropods	X	✓	✓(small to medium)	✓(small to medium)	✓	X	X	X	X
Rodents	✓(small)	✓	✓(small to medium)	X	X	✓(small, 2nd hand to support with large)	✓(small)	✓(small)	X
Mammals	✓(small to medium)	✓(small to medium)	✓(small to medium)	✓(small to medium)	✓(medium to large)	X	✓(small)	✓(small)	X

Avoiding Injury and Disease

- Injuries caused by animals, either domestic or wild, can lead to severe infections and can even spread diseases.

- It is essential to receive medical care right away if you have been attacked or harmed by a wild or domesticated animal.
- Many animals have defence mechanisms or delicate structures which need to be considered when handling them. Some guidance on avoiding injuries:
- Skin: Skin is an important organ. Damage to the skin of an animal leaves it susceptible to possible bleeding and infection. Some species such as the secrete a toxic substance from their skin whilst other amphibians have very delicate skin that is permeable enough to allow the absorption of chemicals therefore clean, moist hands are required when handling.
- Tail: The tail of some reptiles can cause injury if not restrained. A defence mechanism of some reptiles (e.g. skinks, geckoes) is tail autonomy which involves the dropping and later regrowing of the tail. The loss of the tail in some species results in a loss of the animal's fat reserves and therefore decreases their chance of survival. Some rodents have fragile tails that can be broken or the skin sheath removed if roughly handled or handled by the tail.
- Feathers: Damage to, severe loss or disruption of the feathers may impact the bird after release and reduce the ability to fly as well as its ability to regulate its temperature.
- Teeth/Beak: Any animal with teeth and/or the ability to open its mouth widely is capable of inflicting a bite. Many species will try and bite to defend themselves and it is therefore important to have control of the head at all times.
- Wings: Some species of bird have wings which they may use as defence (e.g. swans, pelicans) and if a handler is hit, injury can result.
- Talons/Claws: For species whose claws/talons are their main defence (e.g. birds of prey), it is important to have control of these first.
- Legs: Some species utilise their powerful legs in response to being handled. Legs cannot only cause injury to the handler but also to the animal if not controlled properly.
- Venom glands: Some species are venomous and use their venom to protect themselves (e.g. venomous snakes, toads, invertebrates).
- Always carry a first aid kit in your vehicle and be aware of your own safety and the safety of others as well as the animals when handling.
- Maintaining hygiene is very important and precautions must be taken to prevent the risk of cross infection between animals and from animals to humans. Sick or injured animals require higher hygiene considerations due to the possibility of zoonosis.
- Personnel must take precautions to minimise the risk of disease transmission to protect themselves, their families and the public"
- All materials and equipment used in the capture, holding transport and manipulation of animals must be cleaned and maintained in a way that minimises the assessed risk of disease transmission.
- Contaminated equipment must be disinfected between animals and between locations where the equipment is used.
- All dead animals will be handled only while wearing gloves.

Useful Equipment

- Personal protection equipment (PPE):
  - Work gloves;

- Long sleeve clothing to reduce the risk of cuts and scratches to the arms and legs
- Goggles/face mask/safety glasses to protect eyes from animals with long beaks or animals which secrete substances
- Gloves (leather) can be useful for animals with sharp claws, teeth and spines or venom glands. Their use is a personal choice as they can decrease tactile sensation.
- If the animal is venomous, additional PPE is required for removal.

- Push broom for gently redirecting small mammals, reptiles, or amphibians;
- Clean (uncontaminated) towels or blankets and containers such as plastic boxes, cat carriers, and a large bin or garbage can for capturing and transporting injured or orphaned wildlife.

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