# Framework Biodiversity Management Plan Dobrun 174.5 MW Solar PV Project, Romania

## Contents



## 1. Introduction and Purpose

AJ Renewables Dobrun SRL (the Client) is developing the Dobrun 174.5 MW Solar Power Project located in Olt County, southern Romania. The Project comprises the development, construction, operation, and decommissioning of a utility-scale photovoltaic (PV) facility and its associated infrastructure.

As documented in the Project Non-Technical Summary (NTS) and the Environmental and Social Due Diligence (ESDD), a number of Priority Biodiversity Features (PBFs) have been identified within the Project area and its immediate area of influence. While the Project footprint is predominantly located within modified agricultural land, certain Project activities have the potential to interact with these PBFs. In accordance with EBRD Environmental and Social Requirement 6, a Biodiversity Management Plan (BMP) is required to be developed for the project to ensure that impacts to PBFs are appropriately avoided, minimized, and managed.

This document presents a Framework BMP that will guide the development of a full project-specific BMP prior to construction. It sets out the practical, biodiversity-related actions to be implemented during Project development, construction and operation, together with associated responsibilities, timeframes, monitoring requirements, and procedures. The objective of the Framework BMP is to ensure that all biodiversity-related actions forming part of the Project's mitigation strategy are clearly defined, and understood, and in place prior to the start of works.

## 2. Key Biodiversity Constraints and Risk Context

The Project is located within a predominantly modified agricultural landscape, with the proposed PV arrays sited entirely on intensively cultivated arable land characterized by low ecological complexity. Baseline surveys confirmed that the PV footprint supports common agricultural flora and fauna and does not contain natural or semi-natural habitats of conservation concern. As such, baseline biodiversity sensitivity within the PV array footprint is considered low.

The principal sensitivity biodiversity in the wider Project area relates to the Olteț River riparian corridor, which forms part of the Natura 2000 site ROSCI0266 Valea Oltețului. Sections of the Project, including Dobrun 1 and Dobrun 5, are located approximately 58 m and 10 m respectively from the Natura 2000 boundary, while the underground transmission line (UTL) crosses the river further downstream. The Natura 2000 site supports Annex I riparian habitats, including habitat types 91F0 (riparian mixed forests) and 92A0 (Salix alba and Populus alba gallery forests), which are spatially confined to the river corridor and were not recorded within the Project footprint.

A screening of habitats and species against the EBRD ESR6 Critical Habitat criteria concluded that Critical Habitat is not triggered for the Project. The detailed Critical Habitat screening and justification are provided in Annex 2. However, Priority Biodiversity Features (PBFs) relevant to the Project include the Annex I riparian habitats associated with the Natura 2000 site, riparian-dependent fauna such as European otter (*Lutra lutra*), and protected bird and bat species that may use the wider landscape for foraging or movement. Overall, biodiversity risk is spatially differentiated across the Project:

- Low within the PV array footprint on modified agricultural land;
- Moderate along sections of the UTL corridor due to temporary disturbance; and
- Higher but spatially constrained within and adjacent to the Natura 2000 riparian corridor.

## 3. Mitigation and Monitoring Framework

This section sets out the Project's mitigation (Table 1) and monitoring (Table 2) framework, defining the overarching avoidance, minimisation, restoration, and enhancement measures that will be applied across construction, and operation.

The mitigation framewok prioritises avoidance of direct and indirect impacts on the Natura 2000 riparian corridor, followed by proportionate measures to minimise construction-related disturbance, restore temporarily affected areas, and manage residual operational impacts. Measures are structured by Project component, including the riparian corridor, the underground transmission line corridor, and the PV array footprint.

During operation, the Project will result in a permanent change in land use from intensive arable agriculture to managed grassland within the PV array footprint. This change represents a residual impact that alters habitat structure and species composition, with a

reduction in arable-associated species and an increase in species adapted to low-intensity grassland and field margin habitats. Enhancement measures are therefore designed to manage this transition proactively, ensuring that the new habitat supports greater ecological function and biodiversity value relative to the pre-project baseline.

A targeted biodiversity monitoring framework must be implemented to verify the effective application of avoidance, minimization, restoration, and enhancement measures, and to ensure compliance with permit conditions and EBRD PR6 requirements (Table 2). Monitoring must focus on risk sensitive locations, particularly the Natura 2000 (ROSCI0266) riparian corridor at the Olteț River crossing and in close proximity to Dobrun 1 and Dobrun 5, HDD entry and exit areas, and sections of the UTL corridor adjacent to semi-natural habitats. Monitoring requirements also reflect the PBFs identified, particularly riparian habitats, birds, bats, and aquatic associated species, as well as reinstatement and enhancement commitments within the PV arrays.

Where monitoring identifies non-compliance, unexpected impacts, or ineffective mitigation, corrective actions must be implemented immediately under the direction of the ECoW and agreed with the Client. This may include modification of construction methods, additional controls, or targeted remedial works. Monitoring outcomes must inform adaptive management, particularly for reinstatement success and operational enhancements, supporting the Project objective of no net loss for identified Priority Biodiversity Features.

| Table 1: Mitigation Hierarchy Framework | | | |
|---|---|---|---|
| **Impact/Issue** | **Receptor** | **Mitigation Category** | **Mitigation Measures and Actions** |
| **1. Construction Phase** | | | |
| **Direct disturbance to Natura 2000 riparian habitats** | Natura 2000 (ROSCI0266) | **Avoid** | Establish clearly demarcated no-go buffers along the riparian corridor prior to construction, with particular emphasis adjacent to Dobrun 1 (58 m away) and Dobrun 5 (10 m away); prohibit permanent infrastructure, construction compounds, material storage, and refuelling within the Natura 2000 (ROSCI0266) site and riparian habitats and semi-natural features through layout and routing design. |
| **Physical disturbance from river crossing works** | Natura 2000 (ROSCI0266) | **Avoid** | Use horizontal directional drilling (HDD) for the Olteț River crossing to avoid open-cut excavation; locate HDD entry and exit points outside riparian habitats and, where practicable, outside the Natura 2000 (ROSCI0266) boundary. |
| **Unnecessary land take and disturbance along the UTL corridor** | Agricultural land; Natura 2000 (ROSCI0266 and ROSCI0168) | **Avoid** | Route the UTL, where practicable, within existing disturbed corridors (e.g., field margins, tracks) and avoid encroachment into semi-natural habitats or areas adjacent to Natura 2000 (ROSCI0266 and ROSCI0168) beyond what is strictly required for installation. |
| **Habitat degradation beneath PV array** | Agricultural soils and soil biodiversity | **Minimise** | Use pile-driven or screw foundations (e.g., post support spikes) in preference to trench-fill or mass concrete foundations, where feasible, to minimize disturbance to soil structure and maintain natural soil functions, including filtering and buffering capacity, while retaining habitat value for below- and above-ground biodiversity. |
| **Pollution, sediment runoff, and accidental spills** | Natura 2000 (ROSCI0266) | **Minimise** | Implement strict spill prevention and response procedures; stabilise exposed soils promptly; manage stockpiles to prevent erosion; install temporary drainage and sediment controls where required; install and maintain sediment and erosion controls to prevent runoff toward the river which could impact aquatic species; provide secondary containment for fuels and hazardous substances; prohibit refuelling near the riparian corridor. |
| **Disturbance from noise, lighting, and construction activity** | Bats; Birds; riparian-associated fauna | **Minimise** | Minimise night-time works near the riparian corridor; use downward-directed, low-intensity lighting limited to essential areas; and manage noise through appropriate equipment selection, maintenance, and scheduling. Where elevated noise levels cannot be avoided, deploy temporary acoustic screens or sound barriers, particularly for works adjacent to sensitive riparian habitats. Where practicable, schedule construction activities in proximity to the riparian corridor to avoid sensitive periods for protected species, including bird breeding seasons and key mammal activity periods, informed by pre-construction ecological checks. |
| **Soil compaction and degradation along UTL corridor** | Agricultural land; Natura 2000 (ROSCI0266 and ROSCI0168) | **Minimise** | Do not drive or operate machinery on exposed topsoil or subsoil once it has been stripped; all vehicle movement must be restricted to designated access routes, trench bases, or protected surfaces (such as temporary mats), to prevent soil compaction and damage; avoid earthworks during periods of excessive soil moisture; sequence works to suit soil conditions. |
| **Loss of soil structure and fertility** | Agricultural land; Natura 2000 (ROSCI0266 and ROSCI0168) | **Minimise** | Strip topsoil and subsoil separately, maintaining horizon integrity; store soils in discrete, clearly marked stockpiles, with controlled height and slope to prevent compaction and erosion; maintain soil stockpiles for the shortest practicable duration. |

| | | | |
|---|---|---|---|
| **Spread of invasive alien species (IAS)** | Agricultural land; Natura 2000 (ROSCI0266 and ROSCI0168) margins | **Minimise** | Clean machinery prior to site entry and when moving between work sections to prevent the introduction and spread of invasive alien species (IAS); avoid the transfer of soil and plant material between locations; inspect soils for the presence of IAS prior to stripping where feasible, and manage soil stockpiles to prevent weed establishment through appropriate shaping and, where necessary, temporary stabilization; develop a site-specific Invasive Alien Species (IAS) management and monitoring plan, either as a stand-alone document or as part of the Biodiversity Management Plan. |
| **Temporary loss of agricultural land, vegetation and soil functions along UTL** | Agricultural land; semi-natural vegetation ; Natura 2000 (ROSCI0266 and ROSCI0168) | **Restore** | Reconstruct soil profiles horizon by horizon following cable installation; reinstate landform, drainage patterns, and field boundaries to pre-construction condition; re-establish agricultural land uses following reinstatement, allowing soil to stabilize before intensive cultivation; use native or locally appropriate vegetation mixes near Natura 2000 boundaries to prevent edge effects. |
| **Temporary disturbance at HDD entry and exit areas** | Natura 2000 (ROSCI0266) | **Restore** | Reinstate disturbed areas immediately following works; restore ground levels and vegetation structure using locally appropriate native or locally appropriate vegetation mixes where planting is required. |
| **2. Operation** | | | |
| **Maladaptive attraction to solar PV array** | Natura 2000 (ROSCI0266) associated fauna *Ophiogomphus cecilia* | **Minimise** | Photovoltaic panels can reflect horizontally polarized light that mimics the visual properties of water surfaces, which may attract aquatic and semi-aquatic insects such as dragonflies that use polarized light cues to locate waterbodies for foraging and breeding. Given the proximity of the Project to the Olteț River, which supports protected dragonfly species *O. cecilia* associated with the riparian corridor, there is a potential pathway for this species to be attracted from the river toward reflective panel surfaces during emergence and breeding periods. To minimize this risk, monitor operation and, where deemed necessary, practical and safe, consider the application of non-polarising white tape around and/or across PV panels, particularly in areas closest to the river corridor (Dobrun 1 and 5), to reduce horizontally polarized light reflection and limit the potential for attraction and ecological trapping of *O. cecilia*. |
| **Permanent change from arable cropping to managed grassland** | Bird and bat species associated with intensive cropping | **Restore/ Enhance** | Establish structurally and functionally diverse grassland beneath and between panels, incorporating a heterogeneous mix of native flowering forbs that support pollinators and native grasses that provide structural diversity, to increase invertebrate abundance and prey availability for birds and bats; implement reduced and non-uniform mowing regimes to allow flowering and seed-setting, retaining patches of taller vegetation to support bird foraging and shelter; select plant species that support nocturnal insects to enhance bat foraging opportunities and maintain movement through the site; avoid routine insecticide/herbicide use for vegetation management. |

| Table 2: Biodiversity Monitoring Framework, Roles and Responsibilities, and Reporting Requirements | | | | | |
|---|---|---|---|---|---|
| **Monitoring Component** | **Phase** | **Scope and Method** | **Frequency** | **Responsibility** | **Reporting** |
| ECoW oversight | Construction | On-site ecological supervision during works in or adjacent to sensitive areas, including Natura 2000 boundary, riparian corridor, HDD works, and reinstatement activities. Authority to stop works if non-compliance or risk to PBFs is identified. | Continuous presence during high-risk works; ad hoc otherwise | ECoW (appointed by Client) | Included in monthly ecological reports; immediate incident notification where required |
| Sensitive area checks | Construction | Visual inspections of riparian buffers, Natura 2000 boundaries, HDD compounds, and adjacent habitats to confirm no encroachment, pollution, or unauthorised activities. | Weekly during active works | ECoW | Monthly ecological report |
| HDD monitoring | Construction | Monitoring of HDD entry and exit pits, drilling fluids, spoil management, and groundwater protection measures to ensure no leakage or disturbance to riparian habitats. | Continuous during HDD works | EPC Contractor (implementation); ECoW (verification) | HDD-specific compliance notes within monthly report |
| Pollution prevention and pumping checks | Construction | Inspection of fuel storage, secondary containment, refuelling areas, sediment controls, and any dewatering or pumping activities near watercourses. | Weekly; daily during HDD or dewatering | EPC Contractor; verified by ECoW | Monthly ecological report; immediate incident reporting |
| Bird and bat disturbance checks | Construction | Pre-works and ongoing checks in riparian-adjacent works areas to confirm absence of active nests or roosts prior to works during sensitive periods; verification of lighting and noise controls. | Pre-works; ad hoc during sensitive seasons | ECoW | Monthly report; pre-works clearance notes |
| IAS monitoring | Construction and early operation | Visual inspection of soil stockpiles, reinstated areas, and disturbed ground for invasive alien plant species; verification of machinery hygiene measures. | Monthly during construction; once post-reinstatement | EPC Contractor; verified by ECoW | Monthly ecological report; post-construction summary |
| Reinstatement checks (UTL and HDD areas) | Construction and post-construction | Verification that soils are reinstated horizon by horizon, landform and drainage restored, and vegetation establishment aligns with agreed restoration principles, particularly near Natura 2000 boundaries. | At completion of each reinstated section; post-construction | EPC Contractor; verified by ECoW | Reinstatement completion notes; included in final construction report |
| PV array enhancement verification | Operation | Confirmation of establishment of managed grassland, pollinator friendly vegetation, reduced mowing regime, and absence of insecticide use, linked to enhancement commitments for birds and bats. | Annually for first 2 years | Client or O&M Contractor | Annual operational biodiversity report |

## Annex 1. Consolidated Baseline Summary

Biodiversity baseline surveys were conducted in May, June and August 2022 targeting flora, mammals, amphibians, reptiles, and birds. The results confirmed that the project area is dominated by intensive agricultural systems with low ecological complexity, consisting of common agricultural weeds and ruderal vegetation, with no rare or protected plant species identified.

For terrestrial fauna, the surveys only recorded common species typical of open plains, such as the European Hare (*Lepus europaeus*) and Roe Deer (*Capreolus capreolus*). Other mammals included a bat fauna dominated by Kuhl's pipistrelle (*Pipistrellus kuhlii*), Common Noctule (*Nyctalus noctula*), Nathusius' pipistrelle (*Pipistrellus nathusii*) and Soprano pipistrelle (*Pipistrellus pygmaeus*). European ground squirrel (*Spermophilus citellus*) was not confirmed during baseline surveys. Only one amphibian (*Pelophylax* sp.) and two reptile species (*Lacerta viridis* and *Lacerta agilis*) were observed during the baseline surveys while avifauna surveys recorded 34 species.

The primary biodiversity sensitivity associated with the Project arises from its proximity to the Natura 2000 site ROSCI0266 Valea Oltețului, which follows the Olteț River and its associated riparian corridor (Figure 1). The underground transmission line (UTL), approximately 24 km in length, undercrosses the Olteț River within the Natura 2000 site using horizontal directional drilling (HDD). The UTL also comes within 20 m of the Natura 2000 site ROSCI0168 Pădurea Sarului (Figure 1). Parts of the Dobrun 1 (58 m proximity) and Dobrun 5 (10 m proximity) PV cluster boundaries are located close to the Natura 2000 site, while the remaining PV clusters are located at greater distances, generally within 2 km of the river corridor. Ecologically, Valea Oltețului comprises a linear riparian system within an otherwise intensively farmed landscape and functions as an important ecological corridor for protected species. Pădurea Sarului comprises of oak forests.

Within ROSCI0266 Valea Oltețului, two habitat types (both non-priority) listed under Annex I of the EU Habitats Directive are present: 91F0 riparian mixed forests and 92A0 *Salix alba* and *Populus alba* gallery forests. These habitats are confined to the river corridor and were not recorded within the PV footprint. The Natura 2000 site also protects 10 species such as the European Otter (*Lutra lutra*), the Lesser Horseshoe Bat (*Rhinolophus hipposideros*), and protected fish like the Balkan Golden Loach (*Sabanejewia balcanica*), but these were not recorded within the project during baseline surveys due to the lack of aquatic habitats and mature forest cover. Similarly, the Fire-bellied Toad (*Bombina bombina*) and the Great Crested Newt (*Triturus cristatus*[1]), as well as the dragonfly *Ophiogomphus cecilia*, were absent from the dry, cultivated land. Due to their dependence on intact hydrological

[1] Possible confusion with the closely related species *Triturus dobrogicus* which occurs in southern Romania.

conditions and their role in supporting fauna, riparian habitats are considered sensitive to construction-related disturbance, pollution, and changes in water quality.

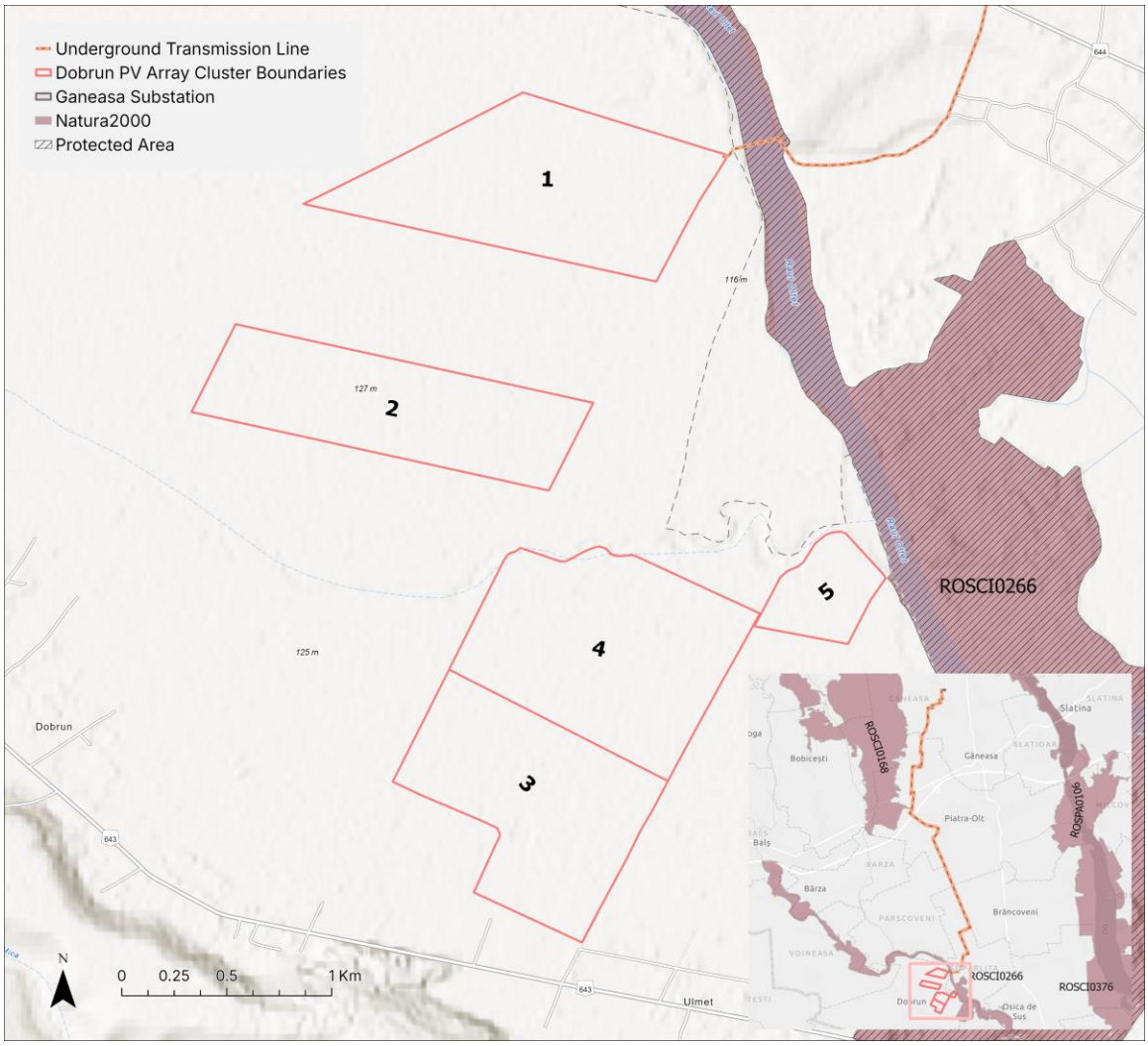


**Figure 1: Project Location, Components, and Layout in relation to Natura 2000 sites.**

Overall, the PV footprint is characterized by low-sensitivity modified agricultural habitat and does not qualify as natural habitat under EBRD ESR6. However, the site and surrounding riparian habitat support potential Priority Biodiversity Features (PBFs). Therefore, permanent habitat loss associated with the Project is limited to agricultural land within the PV footprint and does not involve Annex I habitats or habitats supporting Priority Biodiversity Features. Temporary habitat loss is primarily associated with construction-phase activities along the UTL corridor and at HDD entry and exit points. These impacts are expected to be short-term and fully reversible through appropriate pollution prevention, and reinstatement measures. With the application of HDD beneath the riparian corridor and post-construction restoration, no permanent loss of Natura 2000 habitats or Priority Biodiversity Features is anticipated.

## Annex 2. Updated Critical Habitat Screening

A summary-level Critical Habitat (CH) screening in accordance with EBRD ESR6 is presented below, drawing on the baseline surveys, review of biodiversity databases (IUCN Red List, GBIF), the ESDD findings, and the proximity of the Project to designated Natura 2000 sites. Because no EAAA has been developed for each biodiversity feature at this stage, this screening considers all species and habitats within 5 km of the PV arrays.

This distance was selected as a precautionary and proportionate screening scale that captures the project site, its immediate zone of influence, and the key ecological features that may support priority biodiversity values, notably the Olteț River channel and associated riparian habitats. The 5 km screening radius is also consistent with the typical foraging and movement ranges of many species groups potentially present in the landscape, including farmland and riparian birds, bats, and semi-aquatic and terrestrial fauna. While species-specific ecological areas of analysis may extend beyond or fall within this distance depending on individual life-history traits, a 5 km radius is considered appropriate at this stage to capture areas that could plausibly be used regularly for foraging, commuting, or dispersal by species associated with the project landscape.

The EAAA encompasses a predominantly agricultural matrix interspersed with small settlements, fragmented woodland patches, hedgerows, field margins, and linear riparian habitats. These features provide potential habitat, movement corridors, and foraging areas for a range of taxa, including birds, bats, amphibians, reptiles, and semi-aquatic species.

### 1. Priority ecosystems

No ecosystems classified as Critically Endangered or Endangered under the IUCN Red List of Ecosystems were identified within the EAAA. The PV array footprint comprises modified agricultural habitat that does not correspond to any threatened ecosystem category at national, European, or global scale.

A Natura 2000 site (ROSCI0266 Valea Oltețului) is located north and east of the PV Arrays, within 500 m to 2 km depending on the location within the project footprint (Figure 1). It protects two habitat types: 91F0 (Riparian mixed forests) and 92A0 (*Salix alba* and *Populus alba* gallery forests). Both are non-priority habitats listed on Annex I of the EU Habitats Directive types and are spatially confined to the riparian corridor of the Olteț River. These habitats were not recorded within the Project footprint, which is located entirely within intensively cultivated agricultural land. The underground transmission line crosses the Olteț River using horizontal directional drilling, and further north, comes within 20 m of Natura 2000 site ROSCI0168 Pădurea Sarului (Figure 1). This site protects non-priority Pannonian-Balkanic turkey oak –sessile oak forests (91M0).

Given that the EAAA does not encompass priority Annex I habitats, the riparian habitats undercrossed (91F0 and 92A0) are considered to qualify as Priority Biodiversity Features under ESR6. **No ecosystems/habitats in the EAAA meet the criteria for Critical Habitat**.

## 1.2 Priority Species and their Habitats

### *1.2.1 Threatened Species*

Species listed under the EU Habitats Directive (Annex II or Annex IV), EU Birds Directive (Annex I), and the Bern Convention (Resolution 6), as well as species listed as Endangered, Critically Endangered, or Vulnerable on the IUCN Red List (or equivalent Regional/National List), were screened within the EAAA (i.e. a radius of 5 km around the PV arrays). This resulted in a total of 105 species (Annex 6). This longlist does not imply confirmed presence, regular occurrence, or functional importance of the EAAA for all listed species.

This longlist was evaluated by determining whether each species could reasonably be expected to occur regularly or predictably within the EAAA and whether the EAAA supports habitat of functional importance to those species, such as foraging, movement, breeding, roosting, or other key life-cycle requirements. High-level desktop screening of the 105 species was undertaken with reference to species' habitat requirements (derived from the IUCN Red List), ecological traits, known distribution patterns, and the availability, extent, and condition of suitable habitat within the EAAA.

The majority of species on the longlist are associated with habitat types that are absent or highly limited within the EAAA, including mature or old-growth forest, extensive wetlands, natural grasslands, steppe habitats, or undisturbed riverine systems. For these species, the intensively cultivated agricultural matrix that dominates the EAAA does not provide suitable conditions to support regular occurrence or functional habitat use. These species were therefore screened out from further consideration.

A subset of species was identified as potentially relevant at a precautionary level, based on plausible regular occurrence within the EAAA (i.e. recorded during baseline surveys) and association with habitat features present in the EAAA. These species include:

- Bird species that may utilise open agricultural landscapes, field margins, or linear features for foraging or movement, particularly in proximity to the Olteț River corridor;
- Semi-aquatic and riparian mammals, notably *Lutra lutra*, associated with the Olteț River channel and riparian habitats within the EAAA;
- Bat species for which regular occurrence within the EAAA is considered likely due to the presence of linear commuting and foraging features such as the river corridor, hedgerows, woodland edges, arable crops, and settlements offering potential roosting opportunities.

For these species, the EAAA was subsequently screened against the Critical Habitat criteria set out in PR6 paragraph 14. Based on habitat availability, spatial extent, landscape context, and degree of fragmentation, the EAAA is not considered capable of supporting threatened species at population sizes, densities, or functional importance that would plausibly qualify it as Critical Habitat. In particular, there is no evidence to suggest that the EAAA supports:

- Significant proportions of global or national populations;
- Important concentrations of threatened species;
- Habitats (breeding sites, maternity or hibernation roosts) essential to the persistence of threatened species populations; or
- Areas that would qualify as habitats of significant importance under PR6.

Accordingly, while Critical Habitat is not triggered for any of the threatened species screened, the species identified above are retained as Priority Biodiversity Features (PBFs), on the basis that regular occurrence within the EAAA is plausible and that the wider landscape may support routine foraging, movement, or dispersal (Table 3). Accordingly, **the EAAA is unlikely to qualify as Critical Habitat for threatened species**.

### *1.2.2 Range-restricted species*

The EAAA does not support regularly occurring species with restricted global ranges, nor does it meet thresholds for holding a significant proportion of the global population of any such species. Therefore, ***range-restricted species criteria for Critical Habitat are not triggered***.

### *1.2.3 Migratory and congregational species*

Migratory bird species were recorded during baseline surveys; however, the EAAA is not identified as an important migration bottleneck, staging area, or congregation site. The intensively managed agricultural landscape does not provide wetland, roosting, or aggregation features capable of sustaining one percent or more of a global population at any point in the species' lifecycle. Accordingly, ***the EAAA does not meet the criteria for Critical Habitat in relation to migratory or congregatory species***.

**Table 3: List of Biodiversity Features Recorded at Dobrun PV Subprojects, and Natura 2000 (ROSCI0266 Valea Oltețului) habitats that quality of Priority Biodiversity Features.**

| 1. Priority ecosystems | | |
|---|---|---|
| **Code** | **Name** | **Criteria Trigger** |
| ***91F0*** | Riparian mixed forests of *Quercus robur*, *Ulmus laevis* and *Ulmus minor*, *Fraxinus excelsior* or *Fraxinus angustifolia*, along the great rivers (Ulmenion minoris) | Annex 1 of EU Habitats Directive, Resolution 4 of Bern Convention |
| **92A0** | *Salix alba* and *Populus alba* galleries | Annex 1 of EU Habitats Directive, Resolution 4 of Bern Convention |

| 2. Priority species and their habitats | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Scientific name** | **Common name** | **Recorded during Baseline Surveys** | **IUCN Global Status** | **RedList Status (Europe)** | **RedList Status (EU28)** | **National Status** | **Criteria Trigger** |
| ***Anthus campestris*** | Tawny Pipit | Yes | LC | LC | LC | LC | Annex I of Birds Directive, Resolution 6 of Bern Convention |
| ***Ciconia ciconia*** | White Stork | Yes | LC | LC | LC | LC | Annex I of Birds Directive, Resolution 6 of Bern Convention |
| ***Coracias garrulus*** | European Roller | Yes | LC | LC | LC | LC | Annex I of Birds Directive, Resolution 6 of Bern Convention |
| ***Corvus frugilegus*** | Rook | Yes | LC | VU | LC | LC | EAAA supports VU species |
| ***Emberiza hortulana*** | Ortolan Bunting | Yes | LC | LC | NT | - | Annex I of Birds Directive, Resolution 6 of Bern Convention |
| ***Lanius collurio*** | Red-backed Shrike | Yes | LC | LC | LC | LC | Annex I of Birds Directive, Resolution 6 of Bern Convention |
| ***Lanius minor*** | Lesser Grey Shrike | Yes | LC | LC | LC | LC | Annex I of Birds Directive, Resolution 6 of Bern Convention |
| ***Phasianus colchicus*** | Common Pheasant | Yes | LC | LC | EN | - | Nationally or regionally (for example, Europe) listed EN or CR species |
| ***Vanellus vanellus*** | Northern Lapwing | Yes | NT | VU | VU | LC | EAAA supports VU species |
| ***Lutra lutra*** | Eurasian Otter | No | NT | NT | NT | - | Annex II of Habitats Directive, Resolution 6 of Bern Convention |
| ***Pipistrellus kuhlii*** | Kuhl's pipistrelle | Yes | LC | LC | | - | Annex IV of the Habitats Directive |
| **Nyctalus noctula** | Common noctule | Yes | LC | LC | | - | Annex IV of the Habitats Directive |
| **Pipistrellus nathusii** | Nathusius' pipistrelle | Yes | LC | LC | | - | Annex IV of the Habitats Directive |
| **Pipistrellus pygmaeus** | Soprano pipistrelle | Yes | LC | LC | | - | Annex IV of the Habitats Directive |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Pipistrellus pipistrellus** | Common pipistrelle | Yes | LC | LC | | - | Annex IV of the Habitats Directive |
| **Myotis daubentonii** | Daubenton's bat | Yes | LC | LC | | - | Annex IV of the Habitats Directive |
| **Eptesicus serotinus** | Serotine bat | Yes | LC | LC | | - | Annex IV of the Habitats Directive |
| **Vespertilio murinus** | Parti-coloured bat | Yes | LC | LC | | - | Annex IV of the Habitats Directive |
| **Rhinolophus hipposideros** | Lesser horseshoe bat | No | LC | LC | | - | Annex II of Habitats Directive, Resolution 6 of Bern Convention, Annex IV of the Habitats Directive |

## 1.3 Screening for *Spermophilus citellus* as a potential Critical Habitat trigger

### *1.3.1 Conservation and policy context*

*Spermophilus citellus* is a species of conservation concern in the EU and is associated with Natura 2000 designations in the region. It is listed as Endangered both globally and in Europe, with a decreasing population. A Natura 2000 site (ROSCI0376 Râul Olt între Mărunței și Turnu Măgurele) located approximately 5 km west of the EAAA lists *S. citellus* among its protected features. In addition, occurrence data in the GBIF database indicate the closest known record is approximately 9 km northeast of the EAAA. These records indicate that the species is present in the wider landscape and therefore warrants focused screening under PR6.

### *1.3.2 Habitat suitability screening within the EAAA*

The European Ground Squirrel is strongly associated with open habitats characterised by short vegetation structure and suitable burrowing soils, typically including steppe and semi-natural grasslands, heavily grazed pastures, airfields, mown lawns, and other short sward habitats, including some artificial open habitats. The species generally avoids persistently tall vegetation and is sensitive to abandonment or vegetation encroachment over multiple seasons.

Within the EAAA, land cover is dominated by intensively managed agricultural land with scattered settlements, fragmented woodland patches, hedgerows, field margins, and a riparian corridor associated with the Olteț River. Within the Project footprint, land use is dominated by intensively managed arable fields cultivated with corn, rapeseed, sunflower, and cereals. These crop types result in tall vegetation for much of the growing season and involve regular deep soil disturbance, conditions that are incompatible with the long-term persistence of *S. citellus* colonies. As such, the Project footprint does not contain extensive areas of semi-natural short grassland, heavily grazed pasture, or other open habitats with persistent short sward structure that are typically required to support ground squirrel colonies. Field margins and linear grassy features may be present but are expected to be narrow, fragmented, and subject to frequent disturbance, which may allow transient use but is unlikely to support colony establishment.

The species was not recorded during baseline surveys. While the survey window was limited and non-detection cannot be treated as confirmation of absence, the absence of obvious habitat indicators of colony presence (for example burrow systems in suitable open grassland) within the Project footprint, together with the predominance of intensive cultivation, suggests that suitable habitat is limited within the footprint and likely occurs, if at all, only in small, localised patches within the wider EAAA.

### *1.3.3 Critical Habitat trigger assessment*

Given the proximity of Natura 2000 sites listing the species and GBIF records in the wider area, *S. citellus* cannot be ruled out from the broader landscape. However, Critical Habitat under PR6 is associated with habitats of significant importance for the species, typically

reflected by areas supporting important concentrations, breeding colonies, or habitat essential to population persistence. On the basis of habitat availability, spatial extent, and fragmentation within the EAAA, it is not currently considered plausible that the EAAA supports colony-level presence or population concentrations of *S. citellus* at a scale that would meet PR6 Critical Habitat criteria. Accordingly:

- Suitable habitat within the Project footprint is considered unlikely, due to intensive cultivation and lack of extensive short-sward grassland.
- Suitable habitat within the wider EAAA is considered limited and patchy, potentially restricted to localised short grass features such as managed grass strips, road verges, or other open areas where soil and sward conditions are appropriate.

**Critical Habitat for *S. citellus* is therefore not considered likely based on currently available information.**

## Annex 3. Pre-Construction Survey Requirements

To confirm baseline assumptions and ensure that mitigation measures are appropriately targeted, a programme of pre-construction ecological surveys and checks must be undertaken prior to commencement of works. These surveys are intended to close identified information gaps, refine mitigation measures where necessary, and confirm the absence of sensitive features within areas subject to construction disturbance. Survey effort must be focused on locations where potential interactions with Priority Biodiversity Features or Natura 2000 qualifying features may occur. The survey results must be used to finalise the project-specific Biodiversity Management Plan and associated method statements prior to the start of construction.

### 1.1 Riparian breeding bird surveys

Targeted breeding bird surveys must be undertaken in areas adjacent to the Natura 2000 (ROSCI0266) riparian corridor, with particular focus on sections closest to Dobrun 1 and Dobrun 5, and along HDD entry and exit areas. Surveys must be conducted during the appropriate breeding season to confirm the presence or absence of nesting activity (i.e. summer) and to inform the need for seasonal restrictions or micro-siting of works.

### 1.2 Otter (*Lutra lutra*) activity checks

Pre-construction otter checks must be undertaken along the Olteț River in the vicinity of HDD works and any areas of potential disturbance to confirm the presence of resting sites, holts, or regular activity. Checks must be undertaken immediately prior to construction to ensure up-to-date information is available to guide avoidance measures.

### 1.3 Annex I habitat boundary confirmation

The boundaries of Annex I riparian habitats (91F0 and 92A0) must be confirmed prior to construction, particularly in proximity to HDD works and along sections of the UTL corridor

near the Natura 2000 (ROSCI0266) site. This will ensure that no-go buffers and avoidance measures are accurately demarcated on the ground.

### 1.4 HDD entry and exit pre-works checks

Pre-works ecological checks must be undertaken at HDD entry and exit locations to confirm the absence of nesting birds, otter resting sites, or other sensitive features immediately prior to commencement of drilling activities. Findings must be used to confirm or adjust construction timing and protective measures.

### 1.5 Habitat suitability screening for European ground squirrel (*S. citellus*)

A targeted habitat suitability screening must be undertaken along the UTL corridor and within other areas of temporary disturbance to assess the potential presence of suitable habitat for *Spermophilus citellus*. This screening should focus on vegetation structure, soil conditions, and land use. A detailed colony survey is needed only if suitable habitat is identified during this screening, in line with a precautionary but proportionate approach.

### 1.6 Invasive alien species (IAS) checks

Pre-construction inspections must be undertaken to identify the presence of invasive alien plant species within construction corridors, working areas, and soil stripping locations. Findings must inform the implementation of IAS avoidance, control, and monitoring measures set out in the Biodiversity Management Plan.

## Annex 5. High-level Loss-Gain Summary

In accordance with EBRD ESR6, the Project applies a No Net Loss (NNL) objective for identified Priority Biodiversity Features (PBFs), including Natura 2000 qualifying habitats and species protected under EU and national legislation (birds and bats). The loss–gain framework presented here is qualitative and high-level, and is intended to contextualize the mitigation hierarchy rather than to provide a quantitative biodiversity accounting.

For PBFs associated with the Natura 2000 riparian corridor (ROSCI0266 Valea Oltețului), including Annex I habitats (91F0 and 92A0) and riparian-dependent species such as *Lutra lutra* and protected birds and bats, the Project is designed to avoid direct habitat loss through the use of no-go buffers and horizontal directional drilling at the river crossing. As a result, no permanent loss of Annex I riparian habitats is anticipated, and potential losses are limited to temporary, indirect disturbance risks during construction, which are addressed through avoidance, minimization and restoration measures and hence unlikely to compromise the NNL objective for these features.

Temporary losses affecting PBF species using the wider landscape are expected along the UTL working corridor and HDD working areas due to short-term vegetation clearance, soil disturbance, and construction activity. These losses are temporary in nature and will be

addressed through full reinstatement of soil profiles, landform, and vegetation, with the objective of restoring habitat function to pre-construction condition. Therefore, the UTL is unlikely to lead to long-term residual impacts on Priority Biodiversity Features , subject to effective implementation of reinstatement and monitoring measures.

Within the PV array footprint, the permanent change from intensive arable cultivation to managed grassland beneath solar panels represents a residual operational impact for PBF bird and bat species associated with agricultural landscapes for nesting and foraging. This land-use change could result in a shift in species composition, with some arable-associated PBF species potentially declining locally, while other species adapted to low-intensity grassland, field margins, and structurally diverse habitats may increase. Direct mortality of threatened birds and bats is unlikely. As such, the change does not constitute a loss of PBF habitat, but rather a modification in habitat structure and management. Enhancement measures, including establishment of structurally diverse grassland, reduced and non-uniform mowing, promotion of pollinator resources, and avoidance of routine insecticide use, are designed to manage this transition proactively, improve ecological function relative to the pre-project baseline, and support the No Net Loss (NNL) objective for identified PBF species. These measures are implemented as on-site enhancements addressing residual operational impacts and are not intended as biodiversity offsets.

## Annex 6. Species Long-List for CH Screening

| Species with IUCN distribution ranges overlapping the area within 5 km of the Dobrun PV arrays (EAAA) that are also listed under one or more relevant legal instruments for the determination of Critical Habitat under EBRD criteria. | | | | | |
|---|---|---|---|---|---|
| **#** | **Scientific name** | **Common name** | **IUCN Red List category (global)** | **Group** | **Legal instrument** |
| **1** | *Acipenser gueldenstaedtii* | Russian Sturgeon | CR | Fishes | EU Habitats Directive Annex IV |
| **2** | *Cricetus cricetus* | Common Hamster | CR | Mammals | EU Habitats Directive Annex IV |
| **3** | *Spermophilus citellus* | European Ground Squirrel | EN | Mammals | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **4** | *Theodoxus transversalis* | Striped Nerite | EN | Invertebrates | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **5** | *Unio crassus* | Thick Shelled River Mussel | EN | Invertebrates | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **6** | *Falco cherrug* | Saker Falcon | EN | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **7** | *Nyctalus lasiopterus* | Giant Noctule | VU | Mammals | EU Habitats Directive Annex IV |
| **8** | *Umbra krameri* | European Mudminnow | VU | Fishes | Bern Convention R6; EU Habitats Directive Annex II |
| **9** | *Acrocephalus paludicola* | Aquatic Warbler | VU | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **10** | *Anser erythropus* | Lesser White-fronted Goose | VU | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **11** | *Miniopterus schreibersii* | Schreiber's Bent-winged Bat | VU | Mammals | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **12** | *Aquila heliaca* | Eastern Imperial Eagle | VU | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **13** | *Falco vespertinus* | Red-footed Falcon | VU | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **14** | *Lutra lutra* | Eurasian Otter | NT | Mammals | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **15** | *Myotis bechsteinii* | Bechstein's Bat | NT | Mammals | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **16** | *Rhinolophus euryale* | Mediterranean Horseshoe Bat | NT | Mammals | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **17** | *Plecotus austriacus* | Grey Long-eared Bat | NT | Mammals | EU Habitats Directive Annex IV |
| **18** | *Aythya nyroca* | Ferruginous Duck | NT | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **19** | *Circus macrourus* | Pallid Harrier | NT | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **20** | *Gallinago media* | Great Snipe | NT | Birds | Bern Convention R6; EU Birds Directive Annex I |

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| **21** | *Limosa lapponica* | Bar-tailed Godwit | NT | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **22** | *Emys orbicularis* | European pond terrapin | NT | Reptiles | Bern Convention R6; EU Habitats Directive Annex II |
| **23** | *Vanellus vanellus* | Northern Lapwing | NT | Birds | |
| **24** | *Accipiter brevipes* | Levant Sparrowhawk | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **25** | *Alcedo atthis* | Common Kingfisher | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **26** | *Anthus campestris* | Tawny Pipit | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **27** | *Ardea alba* | Great White Egret | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **28** | *Ardea purpurea* | Purple Heron | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **29** | *Ardeola ralloides* | Squacco Heron | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **30** | *Alosa immaculata* | Pontic Shad | LC | Fishes | Bern Convention R6; EU Habitats Directive Annex II |
| **31** | *Leuciscus aspius* | Eurasian Asp | LC | Fishes | Bern Convention R6; EU Habitats Directive Annex II |
| **32** | *Bombina bombina* | Fire-bellied Toad | LC | Amphibians | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **33** | *Dryomys nitedula* | Forest Dormouse | LC | Mammals | EU Habitats Directive Annex IV |
| **34** | *Eudontomyzon vladykovi* | Vladykov's Lamprey | LC | Fishes | Bern Convention R6; EU Habitats Directive Annex II |
| **35** | *Romanogobio uranoscopus* | Stone Gudgeon | LC | Fishes | Bern Convention R6; EU Habitats Directive Annex II |
| **36** | *Gymnocephalus schraetser* | Striped Ruffe | LC | Fishes | Bern Convention R6; EU Habitats Directive Annex II |
| **37** | *Gymnocephalus baloni* | Balon's Ruffe | LC | Fishes | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **38** | *Muscardinus avellanarius* | Hazel Dormouse | LC | Mammals | EU Habitats Directive Annex IV |
| **39** | *Myotis blythii* | Lesser Mouse-eared Myotis | LC | Mammals | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **40** | *Myotis emarginatus* | Geoffroy's Bat | LC | Mammals | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **41** | *Myotis myotis* | Greater Mouse-eared Bat | LC | Mammals | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **42** | *Myotis mystacinus* | Whiskered Bat | LC | Mammals | EU Habitats Directive Annex IV |
| **43** | *Nyctalus leisleri* | Leisler's Bat | LC | Mammals | EU Habitats Directive Annex IV |
| **44** | *Nyctalus noctula* | Common Noctule | LC | Mammals | EU Habitats Directive Annex IV |
| **45** | *Ophiogomphus cecilia* | Green Snaketail | LC | Invertebrates | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **46** | *Pipistrellus kuhlii* | Kuhl's Pipistrelle | LC | Mammals | EU Habitats Directive Annex IV |

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| **47** | *Pipistrellus nathusii* | Nathusius' Pipistrelle | LC | Mammals | EU Habitats Directive Annex IV |
| **48** | *Rhinolophus hipposideros* | Lesser Horseshoe Bat | LC | Mammals | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **49** | *Triturus dobrogicus* | Danube Crested Newt | LC | Amphibians | Bern Convention R6; EU Habitats Directive Annex II |
| **50** | *Vespertilio murinus* | Parti-coloured Bat | LC | Mammals | EU Habitats Directive Annex IV |
| **51** | *Zingel streber* | Danube Streber | LC | Fishes | Bern Convention R6; EU Habitats Directive Annex II |
| **52** | *Zingel zingel* | Zingel | LC | Fishes | Bern Convention R6 |
| **53** | *Mustela eversmanii* | Steppe Polecat | LC | Mammals | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **54** | *Misgurnus fossilis* | European Weatherfish | LC | Fishes | Bern Convention R6; EU Habitats Directive Annex II |
| **55** | *Cobitis elongatoides* | Danubian Spined Loach | LC | Fishes | Bern Convention R6; EU Habitats Directive Annex II |
| **56** | *Rhodeus amarus* | European Bitterling | LC | Fishes | Bern Convention R6; EU Habitats Directive Annex II |
| **57** | *Natrix tessellata* | Dice Snake | LC | Reptiles | EU Habitats Directive Annex IV |
| **58** | *Lacerta agilis* | Sand Lizard | LC | Reptiles | EU Habitats Directive Annex IV |
| **59** | *Eleocharis carniolica* | | LC | Flowering Plants | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **60** | *Marsilea quadrifolia* | Water Shamrock | LC | Ferns | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **61** | *Liparis loeselii* | Fen Orchid | LC | Flowering Plants | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **62** | *Cirsium brachycephalum* | | LC | Flowering Plants | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **63** | *Lindernia procumbens* | Lindernie couchée | LC | Flowering Plants | EU Habitats Directive Annex IV |
| **64** | *Caldesia parnassifolia* | | LC | Flowering Plants | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **65** | *Asio flammeus* | Short-eared Owl | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **66** | *Burhinus oedicnemus* | Eurasian Thick-knee | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **67** | *Chlidonias hybrida* | Whiskered Tern | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **68** | *Chlidonias niger* | Black Tern | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **69** | *Ciconia ciconia* | White Stork | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **70** | *Ciconia nigra* | Black Stork | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **71** | *Circus aeruginosus* | Western Marsh-harrier | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |

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|---|---|---|---|---|---|
| **72** | *Circus cyaneus* | Hen Harrier | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **73** | *Circus pygargus* | Montagu's Harrier | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **74** | *Coracias garrulus* | European Roller | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **75** | *Crex crex* | Corncrake | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **76** | *Dendrocopos syriacus* | Syrian Woodpecker | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **77** | *Emberiza hortulana* | Ortolan Bunting | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **78** | *Falco columbarius* | Merlin | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **79** | *Falco peregrinus* | Peregrine Falcon | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **80** | *Ficedula albicollis* | Collared Flycatcher | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **81** | *Ficedula parva* | Red-breasted Flycatcher | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **82** | *Himantopus himantopus* | Black-winged Stilt | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **83** | *Ixobrychus minutus* | Common Little Bittern | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **84** | *Lanius collurio* | Red-backed Shrike | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **85** | *Lanius minor* | Lesser Grey Shrike | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **86** | *Lullula arborea* | Woodlark | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **87** | *Luscinia svecica* | Bluethroat | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **88** | *Milvus migrans* | Black Kite | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **89** | *Milvus milvus* | Red Kite | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **90** | *Pandion haliaetus* | Osprey | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **91** | *Pernis apivorus* | European Honey-buzzard | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **92** | *Picus canus* | Grey-faced Woodpecker | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |
| **93** | *Lissotriton vulgaris* | Smooth Newt | LC | Amphibians | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **94** | *Pipistrellus pipistrellus* | Common Pipistrelle | LC | Mammals | EU Habitats Directive Annex IV |
| **95** | *Myotis daubentonii* | Daubenton's Bat | LC | Mammals | EU Habitats Directive Annex IV |
| **96** | *Plecotus auritus* | Brown Long-eared Bat | LC | Mammals | EU Habitats Directive Annex IV |
| **97** | *Myotis brandtii* | Brandt's Bat | LC | Mammals | EU Habitats Directive Annex IV |
| **98** | *Felis silvestris* | European Wildcat | LC | Mammals | EU Habitats Directive Annex IV |
| **99** | *Recurvirostra avosetta* | Pied Avocet | LC | Birds | Bern Convention R6; EU Birds Directive Annex I |

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|---|---|---|---|---|---|
| **100** | *Bufotes viridis* | Green Toad | LC | Amphibians | EU Habitats Directive Annex IV |
| **101** | *Pelobates fuscus* | Common Spadefoot | LC | Amphibians | Bern Convention R6; EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **102** | *Elaphe sauromates* | Eastern Four-Lined Ratsnake | LC | Reptiles | EU Habitats Directive Annex II; EU Habitats Directive Annex IV |
| **103** | *Cottus gobio* | European Bullhead | LC | Fishes | Bern Convention R6; EU Habitats Directive Annex II |
| **104** | *Phasianus colchicus* | Common Pheasant | LC | Birds | |
| **105** | *Corvus frugilegus* | Rook | LC | Birds | |