

MINISTRY OF ENVIRONMENT, WATER AND FORESTS
County Environmental Protection Directorate - Constanța

ANMAP
National Agency for Environment and Protected Areas

ENVIRONMENTAL AGREEMENT
No. 6 of 08.04.2026

Following the application submitted by ***SOUTH WIND SRL, with its registered office in Bucharest, 4 Comana Street, 1st floor, 1st District***, registered with the Constanța Environmental Protection Agency under No. 282RP/21.01.2025, pursuant to Act No. 292/2018 on the environmental impact assessment of certain public and private projects and Government Emergency Ordinance No. 57/2007 on the regime of protected natural areas, the conservation of natural habitats, and wild flora and fauna, approved with amendments and additions by Act No. 49/2011, as subsequently amended and supplemented, pursuant to Government Decision No. 311/2025 on the organisation and functioning of the National Agency for Environment and Protected Areas and Government Emergency Ordinance No. 57/2007 on the regime of protected natural areas, the conservation of natural habitats, wild flora and fauna, approved with amendments and additions by Act No. 49/2011, as subsequently amended and supplemented, where applicable, we hereby issue this:

ENVIRONMENTAL AGREEMENT

for the project: '**48CE WIND FARM, SUBSTATIONS, ELECTRICAL CONNECTION NETWORKS, CONSTRUCTION AND MODERNISATION OF COMMUNICATION AND ACCESS ROADS**', located outside the built-up area, in the commune of Cerchezu, county of Constanta, that establishes the environmental protection conditions and measures that must be complied with for the project which stipulates:

I.1. The project falls within the provisions of Act No. 292/2018 on the environmental impact assessment of certain public and private projects, Annex 2, point 3, letter i.

- the proposed project **falls** within the scope of Act No. 292/2018 on the environmental impact assessment of certain public and private projects, as set out in Annex 2, point 3, letter i;
- The proposed project **falls** within the scope of Article 28 of Government Emergency Ordinance No. 57/2007 on the regime of protected natural areas, the conservation of natural habitats, and wild flora and fauna, approved with amendments and additions by Act No. 49/2011, as subsequently amended and supplemented. The project site is located approximately 2.8 km from the boundary of the ROSAC0071 Dumbrăveni - Urluia Valley - Vederoasa Lake site, and approximately 6.3 km from ROSPA0166 Plopeni - Chirnogeni, approximately 7.2 km from ROSPA0036 Dumbraveni, approximately 14.4 km from ROSAC0157 Hagieni Forest - Cotul-Vaii, approximately 18.6 km from ROSPA0094 Hagieni Forest, ROSPA0151 Ciobănița Osmancea, approx. 19.4 km from ROSPA0001 Aliman-Adamclisi, at a distance of approx. 410 m from the BG0000569 Kardam protected natural area and at a distance of approx. 3.64 km from the BG0000570 Izvorovo – Kraiste protected natural area;
- the proposed project **falls** within the scope of Articles 48 and 54 of Water Act No. 107/1996, as subsequently amended and supplemented,
- the project **falls** within the scope of Act No. 22 of 22 February 2001, ratifying the Convention on Environmental Impact Assessment in a Transboundary Context, adopted at Espoo on 25 February 1991, as subsequently amended and supplemented, and is classified under Annex 1, point 15;

2. Description of the project and all the characteristics of the works envisaged by the project, including the installations, equipment and natural resources used.

Location

This project involves the construction of a wind farm (wind turbines) and a wind power station, including: wind turbines, access roads and installation/maintenance platforms, electrical substations

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(own), medium and high-voltage power grid, and telecommunications network. The land on which the investment is to be carried out is situated outside the built-up area of the commune of Cerchezu, Constanța County.

The main use of the study area is agriculture; the agricultural land, currently designated as arable, covers an area of approximately 114 ha.

The area under consideration for the project's implementation includes agricultural land designated as arable land and land for special purposes – farm tracks located within the public domain of the Cerchezu commune, administered by the Cerchezu Commune Local Council, and the public domain of county interest.

SOUTH WIND SRL intends to construct and operate a wind farm equipped with 48 (46) wind turbines, each with a capacity ranging from 6.2 to 7 MW/h.

The land on which the project will be built is bordered by:

- **North:** boundary of the Independența local municipality – privately owned agricultural land;
- **South:** the border with Bulgaria;
- **East:** boundary between the Chirnogeni and Negru Vodă local municipalities – privately owned agricultural land;
- **West:** boundary between the Independența and Dumbrăveni local municipalities – privately owned agricultural land.

To feed the generated energy into the grid, the wind turbines are interconnected via an underground power lines (LES) to the two 33 kV/110 kV substations located within the study area. In order to connect the wind farm to the National Power System (SEN), an underground electrical connection will be established from the 33 kV/110 kV substations to the 110 kV/400 kV substation and subsequently to the 400 kV Deleni substation in the area.

The electrical connection network between the turbines and the 33 kV - 110kV substations, located on plots A 5/28 and A 207/11, will be buried at a depth of 1.00–1.50 m and will be laid along the developed/undeveloped service roads in the study area.

Based on TRANSGAZ SA's approval no. 34618/948/10.05.2023, two sites, the T17 and T23 power stations, were abandoned as they did not comply with the legal distances from the main pipelines identified in the approval. The resulting wind farm will consist of 46 wind turbines, each with an individual capacity ranging from 6.2 to 7 MW, totalling a final capacity of 303.6 MW.

The following works will be carried out to implement the project:

- Construction of foundations and technical platforms for the installation of wind turbines;
- Installation of wind turbines with an individual capacity ranging from 6.2 to 7 MW each, with a total capacity of approximately 316.8 MW (303.6 MW);
- Construction of agricultural access roads for heavy traffic, up to 5.5 m wide;
- Construction of two 33 kV/110 kV substations;
- Installation of 33 kV underground power lines to connect the wind turbines to the substations.

To implement the project, works will be carried out to construct the turbine foundations and improve the soil, modernise existing roads and construct new roads within the plots, construct assembly platforms, build electrical substations and connections to the turbines, construction site mobilization, install video surveillance poles, and the installation of settlement gauges to monitor the behaviour of the foundations.

Based on the feasibility study regarding the connection of the wind farm to the National Grid, the project beneficiary has decided on the connection solution, namely via underground cables laid along the roads. These connection cables between the internal substations and the connection point(s) to the National Power Grid, as well as the main substation and the necessary works to the existing ones, are not covered by this project, as they are regulated separately in terms of environmental protection under other procedures.

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The Stereo 70 coordinates of the turbines belonging to the Cerchezu Wind Farm are:

No.	Turbine name	Stereo 70 coordinates	
		X	Y
1	T1	260599.019	752012.767
2	T2	260707.001	750671.999
3	T3	259835.487	752269.785
4	T4	261197.145	751390.489
5	T5	264646.238	749691.162
6	T6	262150.001	752014.999
7	T7	261952.001	753482.999
8	T8	262714.286	752564.203
9	T9	262762.001	753715.999
10	T10	263531.999	752025.001
11	T11	264173.999	753446.001
12	T12	264090.001	751208.499
13	T13	265301.333	753471.417
14	T14	265151.100	752424.777
15	T15	264856.001	750707.999
16	T16	265247.999	750123.001
17	T17	withdrawn due to the restriction imposed by the Transgaz Notice	
18	T18	265937.827	752,799.265
19	T19	266231.999	752217.001
20	T20	265753.999	750950.001
21	T21	267572.999	754183.001

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22	T22	267318.999	753366.001
23	T23	withdrawn due to the restriction imposed by the Transgaz Notice	
24	T24	268239.002	752787.999
25	T25	267693.001	752097.001
26	T26	267999.280	751304.764
27	T27	266832.497	750,852.505
28	T28	268624.561	751945.673
29	T29	268896.999	751221.001
30	T30	268321.998	750535.004
31	T31	269066.999	749761.001
32	T32	270335.500	747726.001
33	T33	266498.001	753303.999
34	T34	267816.000	746256.001
35	T35	266886.352	745032.913
36	T36	267011.500	745651.001
37	T37	266552.771	746815.687
38	T38	265559.500	747640.001
39	T39	265007.000	748383.000
40	T40	264502.835	747360.956
41	T41	263530.000	746831.999
42	T42	262344.000	747152.999
43	T43	263300.00	746135.001
44	T44	263248.999	745343.500
45	T45	264211.500	743775.501
46	T46	265013.000	743344.001
47	T47	264628.000	742443.001

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48	T48	261159.314	750172.055
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The main stages of the project

The main stages of the project are:

- The construction phase;
- The operational phase;
- Decommissioning stages.

The main works to be carried out during the construction phase are:

- Works to set up the construction site;
- Works to build access routes, including the rehabilitation of existing service roads and the construction of new roads;
- Work to develop the technical platform specific to each wind turbine;
- Construction of wind turbine foundations;
- Excavation and laying of underground power lines connecting the turbines to the substation;
- Transport of turbine components and materials;
- Construction of 33/110 kV substations and the wind farm's command and control system;
- Installation of wind turbines;
- Site restoration works;

During the operational phase, in addition to the actual operation of the wind turbines and substations, periodic maintenance and repair activities will be carried out. The operational life of the wind farm is estimated at 40 years.

At the end of the wind farm's lifespan, decommissioning will take place, consisting of dismantling the turbines and removing them from the site, demolishing the foundations to a depth that allows agricultural activities to resume and backfilling the demolished area, unearthing underground power lines, decommissioning the transformer stations, technical platforms and access roads within the plots to allow them to be returned to agricultural use.

Physical characteristics of the project:

This project involves the construction of a wind farm (wind turbines) and a wind power station, including: wind turbines, access roads and installation/maintenance platforms, electrical substations (own), medium and high-voltage power grid, and telecommunications network. The land on which the investment is to be carried out is located outside the built-up area of Cerchezu commune, Constanța county. The wind farm site will be developed exclusively on land classified as 'arable'.

The following works will be carried out to implement the project:

- Construction of foundations and technical platforms for the installation of wind turbines;
- Installation of wind turbines, with a total capacity of approx. 316.8 MW (303.6 MW);
- Construction of agricultural access roads for heavy traffic, up to 5.5 m wide;
- Construction of two 33 kV/110 kV substations;
- Installation of 33 kV underground power lines to connect the wind turbines to the substations.

Overview of the project:

The land on which the investment covered by this documentation is to be developed consists of the plots shown in the following table:

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Components	Total ha
Foundations	14
Technical platforms	39.76
Transformer stations	3.03
Internal access road network, superimposed on existing agricultural roads, 5.5 m wide, to be gravelled	57.70
Construction site mobilization	0.9
Total area	114

The construction of the energy park will result in the occupation of land areas:

- **56 ha** for the siting of wind turbines, ancillary structures and substations
- **57.07 ha** permanently occupied by service roads and access roads.

For each plot on which wind turbines are to be installed, a request will be made for the permanent removal from agricultural use of the areas occupied by the turbine foundations, access roads to the turbines and maintenance platforms. The wind farm will result in the permanent removal from agricultural use of an area of approx. 30 ha.

The land on which the proposed project is to be located is typical of the Dobrogea plateau, with no significant variations in elevation. The land is free of any buildings.

To date, the transport routes for the components required to build the wind farm have not been finalised.

The height of the wind turbine towers will be between 155 and 165 m, measured at the yaw system axis, to which is added the yaw system, with three blades 75–85 m in length. The maximum height of 240 m will be observed, in accordance with the AACR's approval. The main components of the wind turbine are listed below:

- **Tower** (pylon) – consisting of several sections, with a height of 155–165 m (at the nacelle), is a slightly conical metal structure
- **Nacelle** – positioned at the top of the tower, comprising the following components: yaw system, gearbox, generator and transformer. A medium-intensity warning light will be installed on the nacelle, in accordance with the requirements of the Romanian Civil Aviation Authority.

The 110/33 kV internal transformer stations will be of the indoor-outdoor type, with the 110 kV equipment located outdoors and the 33 kV equipment indoors. The substations will be equipped with a 110 kV switchgear bay, 33/110 kV transformers of various capacities (e.g. 63 MVA), and the medium-voltage switchgear bays will be connected to a single, unsectioned busbar. Furthermore, the substations will be equipped with a 30/0.4 kV internal service transformer, a generator set, auxiliary installations, communications, protection and electricity metering systems, as well as anti-theft and fire protection systems.

The land allocated for the construction of the 33/110 kV substation components is 3.03 ha.

The substations will operate automatically and will not have permanent operating staff. There will be no water supply or sewerage systems within the substations.

The external LES network (connection to the National Grid) is not covered by this Presentation; it will be regulated from an environmental protection perspective through a separate procedure. However, it was considered prudent to analyse the current version of the proposed solution, as it is an essential part of the project. However, the current version is not final, given that the connection study has not been completed.

The total length of the underground interconnection lines for the turbines (internal) within the wind farm is approximately 70.0 km.

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The areas required for the underground power lines have not been included in the land use assessment as the trenches will be located along the service roads (under one side), which constitute the access routes to the farm and have already been quantified separately.

It is proposed to install 46 wind turbines with an individual capacity ranging from 6.2 to 7 MW each and a total capacity of approximately 316.8 MW (303.6 MW). The wind farm's generation capacity depends mainly on wind speed.

At present, there are no installations on the site and no technological processes are taking place. The site of the future wind farm is currently used for agricultural purposes.

The proposed wind farm will generate electricity to be supplied to the National Grid (S.E.N.). Connection cables between the internal transformer stations and the connection point(s) to the SEN are not covered by this memorandum and will be finalised at a later stage, once the Connection Solution Study has been approved.

During the construction phase of the wind farm, construction materials required for the works specified in the project will be used: various types of concrete, reinforcement for the construction of foundations, ballast, sand, crushed stone, geotextile, etc. At this stage, no information is available regarding the quantities of raw materials and fuels required during the construction phase. It should be noted that this may be subject to minor changes.

Furthermore, during the construction phase, fuel and oils necessary for the operation of the vehicles and machinery involved in the works will be used; these will be stored in the area allocated to the construction site mobilizations.

During the operational phase

The operation of wind turbines does not require the use of raw materials, but only consumables (oil and air filters) and various chemical substances and preparations (oils, lubricants, greases, paints), which must be replaced at certain intervals as part of maintenance activities. At present, the quantities of consumables required during the operational phase are not known.

Utilities

The proposed project does not involve connection to existing utility networks, including telecommunications, drinking water, sewerage, gas or electricity (other than the included power lines), either during construction or during the operation of the investment.

Upon completion of the project works, the land temporarily occupied will be restored to its original condition and, as far as possible, returned to agricultural use.

Access roads will follow the routes of existing agricultural and municipal roads, with the exception of curved sections where widening works are required to accommodate oversized vehicles, on a few private plots (contracted by the beneficiary). Widening works on bends will be carried out in all cases by utilising private properties adjacent to the road.

Foundations

The reinforced concrete foundations for the installation of wind turbines shall be cylindrical in shape with foundation piles, with a diameter ranging from 18 to 30 m and a variable depth (depending on local ground conditions). The depth and diameter of the foundation for each individual turbine will comply with the minimum requirements set by the turbine manufacturer and will be calculated based on the geological structure, which will be identified by the Geotechnical Study.

The area occupied by the wind turbine foundations is 14 ha.

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Service platforms

The service platforms for crane installation will be located near the turbines and will have average areas of between 700 and 2,000 m², comprising paved areas on which cranes used for the installation, maintenance and decommissioning of the wind turbines will be mounted. In some cases, there will be a short section of internal road, approximately 5 m wide, between the service platform and the access road at the end of the plot. The following figure shows a schematic example of a service platform proposed for the project.

The area occupied by the service platforms for the wind turbines is approximately 55.76 ha.

Wind turbines

The height of the wind turbine towers will be between 155 and 165 m, measured at the yaw system axis, to which is added the yaw system, with three blades 75–85 m in length. The maximum height of 240 m will be observed, in accordance with the AACR opinion. The main components of the wind turbine are listed below:

- **Tower (pylon)** – consisting of several sections, with a height of 155–165 m (at the nacelle), is a slightly conical metal structure
- **Nacelle** – positioned at the top of the tower, comprising the following components: yaw system, gearbox, generator and transformer. A medium-intensity warning light will be installed on the nacelle, in accordance with the requirements of the Romanian Civil Aviation Authority.

When selecting turbine locations, safety and protection distances from municipal infrastructure elements were taken into account, as specified in the 'Technical Standard on the Delimitation of Protection and Safety Zones for Energy Facilities', approved by ANRE Order No. 239/2019.

The following figure illustrates the vertical dimensions of the wind turbine.

Transformer station

The proposed wind farm will have two areas for the 33/110 kV internal substations, the location of which has been optimised based on the distances from the wind turbines they serve.

The 110/33 kV internal substations will be of the indoor-outdoor type, with the 110 kV equipment located outdoors and the 33 kV equipment indoors. The substations will be equipped with a 110 kV switchgear bay, 33/110 kV transformers of various capacities (e.g. 63 MVA), and the medium-voltage switchgear bays will be connected to a single, unsectioned busbar. The substations will also be equipped with a 30/0.4 kV internal service transformer, a generator set, auxiliary installations, communications, protection and electricity metering systems, as well as anti-theft and fire protection systems.

The land allocated for the construction of the 33/110 kV substation components is approximately 3 ha.

The substations will operate automatically and will not have permanent operating staff. There will be no water supply or drainage systems within the substations.

The proposed locations for these substations are shown on the following map.

Underground power lines

The external underground power line network (connection to the National Grid) is not covered by this Environmental Impact Report; it will be regulated from an environmental protection perspective through a separate procedure. However, it was considered prudent to analyse the current version of the proposed solution, as it is an essential part of the project. However, the current version is not final, as the connection study has not yet been completed.

The total length of the underground interconnection lines for the (internal) turbines in the wind farm is approximately 70 km.

The areas required for the underground power lines have not been included in the land use assessment as the trenches will be located along the service roads (under one side), which constitute the access routes to the farm and have already been quantified separately.

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Works required for the organisation of construction site

To carry out the proposed investments, three temporary site facilities are required on plots: A251/1/31, A367/15, A250/9. The site facilities will occupy a temporary area of approximately 3,000 m² each (total 9,000 m²).

- The following works will be required to set up the construction site:
- Demarcation and fencing of the site area;
- Preparation of the site area for the installation of the necessary facilities;
- Building the access road;
- Setting up and organising the area designated for separate waste collection;
- Placement of containers for use as storage, toilets, etc.;
- Provision of utilities – electricity, water supply and wastewater management;
- Installation of fire safety signage and signage in accordance with current legal provisions;
- Provision of site lighting;
- Installation of CCTV surveillance equipment.

The construction site will be situated on the area designated for the investment project. The areas designated for the construction site mobilization will be located on land that has already been registered and fenced off for the duration of the construction works. The site facilities and storage of materials will be situated within the project area and will not require the occupation of any additional land.

Technological organisation

In accordance with the specific requirements and execution technologies for construction and installation works, the following technical equipment will be present on site during the project's implementation:

- Track- and wheeled construction machinery, intended for various mechanised works—excavation, loading, pushing, compaction, etc.;
- Machinery for lifting, transporting and handling loads;
- Machinery and equipment for the transport and pouring of concrete;
- Motor vehicles;
- Hand tools and small-scale mechanised equipment;
- Various tools, implements and devices.

Provision of utilities on site

- Domestic water (bathrooms and toilets) – domestic water will be delivered to the construction site by tankers.
- Drinking water will be delivered in plastic containers from specialist suppliers;
- Wastewater – wastewater will be collected in watertight septic tanks, which will be emptied by a specialist firm;
- Eco-friendly toilets – these will be emptied and sanitised by a specialist company;
- Electricity – the electricity required for the operation of the construction site will be supplied by generators or, where possible, by connecting to the public electricity grid.
- Waste generated by the site operations will be sorted into bins labelled with the waste code and handed over to an authorised company for disposal/recycling.

Construction site demobilization

Upon completion of the construction works for the wind farm, the construction site mobilization will be decommissioned and the land restored to its original condition, as follows;

- Removal of equipment;
- Dismantling of fencing (if applicable);
- Dismantling of the crushed stone platform;
- Re-vegetation of the site area with topsoil.

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Demolition works

Currently, there are no structures on the site under consideration that require demolition for the implementation of the project.

The construction of the wind farm does not require the decommissioning of existing buildings.

If decommissioning of the wind farm is necessary, this will mainly consist of the following activities:

- site preparation works – similar to the construction phase of the wind farm. The chosen location will be used temporarily and will be restored to its original use upon completion of the works;
- dismantling the turbines and removing them from the site;
- demolition of the foundations to a depth that allows agricultural activities to resume (approx. 1 m below ground level) and backfilling of the demolished area;
- excavation of underground power lines and their removal from the site;
- decommissioning of transformer stations – dismantling of equipment and installations and their removal from the site;
- decommissioning of technical platforms and access routes within the plots with a view to returning them to agricultural use;
- site restoration works in the affected areas.

For the decommissioning phase, it will be necessary to draw up a specialist technical design, in accordance with the regulations in force at the time. Currently, legal procedures require a Termination Notice to be obtained for this type of work, with the appropriate environmental consent procedure being followed.

Site restoration works

Upon completion of the construction works, the Contractor shall ensure the restoration of the natural environment of the areas temporarily occupied but not affected by the project works. The areas affected by the construction works shall be restored to a condition that ensures the landscape integration of the elements subject to restoration works. This work will be carried out by cleaning up the area (complete removal of waste resulting from activities specific to the work areas, including household waste), planting species of vegetation specific to the area, etc. The restoration works aim both to ensure the landscape restoration of the affected areas and to reduce the risk of invasive alien plant species entering and establishing themselves on the affected surfaces, which would endanger the areas in the vicinity of the proposed project.

II. THE REASONS AND CONSIDERATIONS UNDERLYING THE ISSUANCE OF THE ENVIRONMENTAL PERMIT

According to Town Planning Certificate No. **129/28.11.2022, issued by the Constanta County Council**, the site of the wind farm comprises agricultural land designated as arable land, extra-urban land designated for agricultural use, and land designated for a specific purpose – a service road. The technical classification of the site is as a wind energy production zone and an agricultural zone for the remaining plots not affected by the wind turbine constructions.

The project is included in the plan/programme/strategy – Decision No. 46/29.10.2025, issued by the Local Council of Cerchezu Commune, adopted by a public authority and has been subject to an environmental assessment procedure in accordance with Government Decision No. 1.076/2004 on establishing the procedure for carrying out environmental assessments for plans and programmes, as subsequently amended, which transposes Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment;

Analysis of alternatives

During the project implementation process, four alternatives were examined:

- **'Zero' alternative** – no project implementation

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- **Alternative I** – initiated in 2011 (comprising 3 wind farms) – 117 wind turbines, with a total installed capacity of 351 MW
- **Alternative II** – initiated in 2022 – 48 wind turbines, with a total installed capacity of 316.8 MW
- **Option III** – was initiated in 2023 following the granting of TRANSGAZ SA approval no. 34618/948/10.05.2023, as a result of which turbines T17 and T23 were dropped, so the new wind farm will comprise 46 wind turbines, with a total installed capacity of 303.6 MW.

In terms of location, the site was selected in 2011 based on general wind maps for Romania, which showed that Constanța County is situated in an area with very good potential, with a constant wind speed of 6.65 m/s. The Cerchezu municipality was chosen due to its flat terrain and generally favourable NNW-S orientation.

In determining the locations of the wind turbines, the following factors were taken into account:

- the ease of securing contracts for private land;
- logistical/transport accessibility;
- energy potential (calculated using the windPRO programme)
- distances to other municipalities;
- distances from the network of protected areas / Natura 2000 sites;
- proximity to the power grid.

The advantages and disadvantages of each alternative, along with the justification for selecting the optimal alternative, are presented below.

The 'zero' **alternative** was considered as a baseline against which the other alternatives are compared for the various elements of the analysed project. The main impacts associated with adopting the 'zero' alternative are:

- the loss of the opportunity to exploit the high wind potential in this area;
- the loss of job opportunities (estimated at 30–75 direct jobs during the pre-construction and construction phases);
- the loss of economic opportunities that would support the local community's socio-economic development, which would help resolve environmental issues;
- loss of interest from private investors in future industrial development projects in the region and in Romania;
- loss of support for the development of a reliable alternative for electricity generation in line with policies developed at European and national level;
- failure to meet the national targets for decarbonising the energy sector and promoting renewable energy sources to achieve a GHG-neutral Romania by 2050.

Identified and studied alternatives

Alternative I consists of the construction of three wind farms comprising 117 wind turbines of 3 MW each, with a total capacity of 351 MW, and three substations.

This option requires a total land area of 473.09 ha (in accordance with the screening stage decisions issued in 2013: DEI 14866/29.04.2013, DEI 14867/22.04.2013, DEI 14868/22.04.2013), of which 3.90 ha will be permanently occupied by buildings and 469.19 ha will be temporarily occupied by construction works. In this variant, the land currently used for agriculture – arable land – requires a change of land use category to 'technical and urban infrastructure', which involves removing 5 ha of arable land from agricultural use.

The advantage of this alternative is the total capacity of 351 MW of the three wind farms, which will replace an equivalent amount of electricity generated from fossil fuels, thereby contributing to the fulfilment of national and European commitments to decarbonise the energy system and diversify energy production sources, ensuring energy independence.

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The *disadvantage* of Alternative I is the large number of wind turbines envisaged by the project, which entails a high density of turbine siting with effects on inhabited areas through increased noise levels, intensified shadow flicker, and a cluttering of the natural landscape.

Added to this is the land area affected by the construction of new roads, foundations and platforms for the 117 wind turbines and the 3 transformer stations.

Furthermore, in 2011, when the Appropriate Assessment Study was carried out for the three wind farms around the village of Cerchezu, from which the analysed project emerged, the ROSPA0166 site had not been designated as a protected area, and the Appropriate Assessment was not based on an evaluation in relation to the conservation objectives of the Natura 2000 sites, as the specific conservation objectives had not been defined at that time. The main conclusion of this Appropriate Assessment was that the siting of wind turbines in the area of interest, an area already developed by human activity, would have an insignificant impact on the local vegetation, flora and fauna.

Alternative II consists of the construction of a wind farm comprising 48 wind turbines with a capacity of 6.6 MW per turbine, the total capacity of the farm being 316.8 MW, and 4 substations.

This option requires a total land area of 3,027.77 ha, of which 309.34 ha will be permanently occupied by structures and 2,718.43 ha will be temporarily occupied by construction works. In this option, the land currently used for agriculture – arable land – would require a change of land use category to 'technical and civil engineering facilities', which would involve removing 309.34 ha of arable land from agricultural use.

The advantage of this alternative is the significantly lower number of turbines, which minimises the disadvantages of the first variant, and the placement of the turbines at greater distances from one another.

By reducing the number of turbines envisaged in the project, the distance between the wind farms is increased to over 600 m, compared to approximately 350 m in the scenario approved in 2011, and the lower density results in a more balanced use of natural resources and reduces pressure on biodiversity both during the project's implementation phase and during the wind farm's operational period.

The *disadvantage* of Alternative II is the lower capacity of the wind farm and the incompatibility of the locations of turbines T17 and T23 with the main natural gas transmission network, which led to the emergence of Alternative III.

Alternative III consists of the construction of a wind farm comprising 46 wind turbines with an individual capacity ranging from 6.2 to 7 MW per turbine, the total capacity of the wind farm being 303.6 MW, and 2 substations.

This option requires a total land area of 3,027.77 ha, of which 292.52 ha will be permanently occupied by buildings and 2,735.25 ha temporarily occupied by construction works, as identified in the Zonal Urban Plan phase. In this option, the land currently used for agriculture – arable land – requires a change of land use category to 'technical and urban infrastructure', which involves removing approximately 30 ha of arable land from agricultural use.

The advantage of this alternative is its compatibility with the natural gas transmission network, combined with the advantages of Alternative II relating to the smaller number of wind turbines and lower density.

The disadvantage of Alternative III is the lower amount of electricity generated.

Following the analysis of the alternatives, **Alternative III** is considered optimal for the following reasons:

Compliance with BAT/BREF/conformity with BAT conclusions, applicable BREF provisions: it does not fall within the provisions of Act 278/2013 on Industrial Emissions;

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Consideration of the direct, indirect and cumulative impact with other existing activities in the area, etc./cumulative impact with the impact of other existing and/or approved projects.

Cumulative impact:

The cumulative impact assessment was carried out by following these steps:

In order to assess the cumulative impact on the environment and on protected natural areas for *the project "48 (46) wind turbines approx. 316.8 MW (303.6 MW), Substations, Connection grids, construction and modernisation of communication and access routes"*, proposed to be located in the town of Cerchezu, Constanța County, the following information was requested from the relevant environmental protection authority in Constanța via letter no. 37/10 May 2024, requesting information regarding projects and plans/strategies approved/endorsed during the period 2020–2024, as well as those currently awaiting approval, located within the territory of Cerchezu and the neighbouring municipalities (Măgura, Căscioarele, Viroaga, Chirnogeni, Negru Vodă, Olteni, Dumbrăveni, Independența, Plopeni), operators carrying out activities within the administrative territory of the municipality of Cerchezu, and the projects and plans/strategies approved/endorsed/pending approval located within the protected areas falling within the project's area of influence: ROSAC0071 (ROSCI0071), ROSPA0036, ROSPA0166, ROSPA0094, ROSAC0157 (ROSCI0157), data regarding the location of the projects/plans in relation to the boundaries of these protected areas and the areas occupied by them within the protected areas, etc.

By letter from APM Constanța No. 5836/12 June 2024, information was provided regarding projects/plans currently undergoing environmental assessment or already completed, identified as being within the area of influence of the Cerchezu wind farm.

According to the available information, the following existing/proposed projects are located in the vicinity of the proposed wind farm, both on Romanian and Bulgarian territory:

- **Existing:**
 - "WIND ENERGY PARK WITH 32 WIND TURBINES, TOTAL CAPACITY 80 MW, SUBSTATION, ELECTRICAL CONNECTION NETWORKS, CONSTRUCTION AND MODERNISATION OF COMMUNICATION AND ACCESS ROADS", located in the communes of Chirnogeni and Independența. The distance between the proposed wind farm and the existing one is approximately 1.5 km (the distance between the proposed T24 turbine and the existing T1 turbine).
 - Wind farm on Bulgarian territory, located 5.6 km from the proposed project (the distance between the proposed T3 turbine and the existing T6 turbine).
- **Proposed:**
 - Wind farm 14 CE-92.4 MW, substation, electrical connection networks, construction and modernisation of communication and access routes – outside the built-up area of Fântâna Mare, Independența commune, Constanța County
 - Wind farm 17 CE-112.2 MW, substation, electrical connection networks, construction and modernisation of communication and access routes – outside the built-up area of Independența commune and Cerchezu commune, Constanța County
 - Comana - Pecineaga Wind Farm - route for MV underground power cables and fibre-optic network
 - Construction of a wind farm including: wind turbines, access roads and installation/maintenance platforms, electrical substation (own), medium and high-voltage electrical network, telecommunications network, Independența commune, Constanța County
 - Demolition of existing structures and construction of a 3.212 MW photovoltaic power plant, connection to the National Grid, siting of the PC and PTAB, construction of internal

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- and access roads, site fencing and construction site mobilization in the village of Independența
- Construction of an underground fibre-optic network for electronic communications services in Constanța County, Independența commune, Dumbrăveni (proposed)
 - Construction of an underground fibre-optic network for electronic communications services, Negru Vodă (proposed)
 - Electricity supply to the water utility, Furnica village, Dumbrăveni commune, Constanța County (proposed)
 - Relocation of the DN 1000T1 Isaccea–Negru Vodă international natural gas transmission pipeline in the ROMCIM quarry area, Medgidia PL (proposed)
 - General Urban Plan for the commune of Independența (proposed)
 - Establishment of a smart natural gas distribution network in the commune of Independența, Constanța County (proposed)
 - Construction of a footbridge in Movila Verde, Bisericii Street, Movila Verde, Independența commune, Constanța County (proposed)
 - Asphaltting of Comana, Tătaru and Pelinu streets, phase I, Comana commune, Constanța County (proposed)
 - Construction of bridges, footbridges and paving of rainwater drainage channels in the village of Credința, Chirnogeni commune (proposed)
 - Modernisation and rehabilitation of streets in Chirnogeni commune, Constanța County (proposed)

For existing projects (Chirnogeni-Independența Wind Farm, Bulgaria Wind Farm), the cumulative impact of the operation of the wind farms during the construction period of the Cerchezu Wind Farm and the cumulative impact of the operation of the wind farms during the operational period of the proposed wind farm have been estimated.

Given the significant distance between the wind farm in Bulgaria and the Cerchezu wind farm, no cumulative impact is estimated at any stage of the project's development (construction, operation).

Given that, during operation, wind farms have no impact on environmental aspects: air, water, soil/subsoil, resource use, waste management, climate change and cultural heritage, the cumulative impact of the operation of the Chirnogeni-Independența wind farm, combined with the construction phase of the Cerchezu wind farm, is the same as that estimated during the construction phase (*insignificant negative*, with the exception of the impact on soil/subsoil, which is *significant negative*).

With regard to noise, during the construction of the Cerchezu wind farm, the noise generated by the works will be added to the noise from the operational wind farm; however, given the topography of the area, the fact that the works will be carried out in phases, and the absence of other noise sources, the cumulative impact is not expected to be greater than that estimated during the construction phase, i.e. insignificantly negative.

With regard to the landscape, the construction of the Cerchezu wind farm will not bring about a significant change to the existing landscape, as it will blend harmoniously into the existing environment, given the presence in the area of the Chirnogeni-Independența wind farm, which has been operational since 2014.

With regard to biodiversity, monitoring reports on the operation of the wind turbines within the Chirnogeni-Independența wind farm concluded that it does not constitute a significant disturbance to local fauna, particularly bird species, as no clear avoidance behaviour of the areas where the turbines are located has been observed, with the structure and composition of the birdlife being similar to those observed during comparable periods in the years prior to the project's implementation phase. Furthermore, no major changes were noted regarding the flora, with the structure and composition of the vegetation on the site and in its vicinity being similar to those observed during previous monitoring periods.

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Therefore, *the cumulative impact of the operation of the Chirnogeni-Independența wind farm, combined with the construction phase of the Cerchezu wind farm, is estimated to be insignificant.*

As regards the cumulative impact of the operation of the Chirnogeni-Independența wind farm combined with the operational phase of the Cerchezu wind farm, this is estimated as follows:

- **Impact on noise:** Wind turbines generate both mechanical and aerodynamic noise. The accumulation of several wind farms can increase noise levels in the area, affecting the quality of life of nearby residents, however, given the noise study carried out for the proposed wind farm, its location relative to the Chirnogeni-Independența wind farm (approximately 1.5 km away) and the open topography of the area, it can be estimated that the cumulative noise effect associated with the simultaneous operation of the wind farms is *insignificantly negative*.
- **Impact on the landscape:** Wind turbines are structures visible from great distances and can significantly alter the local landscape. The accumulation of several wind farms may lead to a visually cluttered perception and an impact on the natural and cultural landscape; however, given the small number of wind turbines proposed for the Cerchezu wind farm and the fact that the Chirnogeni-Independența wind farm has been operational since 2014 and is integrated into the landscape, it is estimated that the cumulative impact of the simultaneous operation of the wind farms on the landscape is *insignificantly negative*, with the new turbines ensuring visual continuity and blending harmoniously into the landscape.
- **Impact on human health:** In addition to noise, wind turbines can cause flicker effects (intermittent shadowing caused by the rotating blades). From the shadow assessment carried out for the Cerchezu wind farm, it can be estimated that the shadow-flicker effects of the two wind farms may overlap in the area where they meet, however, this area lies outside the built-up areas of the municipalities, 1.2 km away from inhabited areas, so that *the cumulative impact of the simultaneous operation of the Cerchezu wind farm and the Chirnogeni-Independența wind farm is estimated to be insignificantly negative.*
- **Impact on the electricity grid:** The addition of a new wind farm in an area with several existing and proposed wind farms may affect the stability and balance of the electricity grid. Through the projects for connection to the National Energy System (SEN), the grid's capacity to manage the energy produced and ensure efficient integration is assessed in detail, so that no *cumulative* impact is estimated from the simultaneous operation of the proposed wind farm with the Chirnogeni-Independența wind farm
- **Impact on biodiversity** In order to assess the impact on species and habitats within the Natura 2000 sites considered in the assessment, the cumulative impact of the project on these sites was analysed. In this regard, the presence of pressures and threats was analysed in the Management Plans and Standard Data Forms for the sites, as well as other projects due to be carried out or currently under implementation that have the potential to affect habitats and species of Community interest.

The management plans for the potentially affected Natura 2000 sites indicate several pressures and threats that may affect habitats and species of Community interest, the most common being urbanisation and the expansion of built-up areas. The construction of roads or motorways and road traffic are also mentioned as pressures/threats in the case of several of the sites included in the assessment.

The cumulative impact analysis for the proposed project aims to identify and describe the cause-and-effect relationships through which the project's interventions, together with other existing or foreseeable plans/projects/activities within the area of influence, may generate additive, synergistic or chain effects on environmental receptors. The approach is based on the fact that, although the direct effects of the project are generally local and specific (land take, construction site, infrastructure), for certain receptors – particularly birds and bats – the relevant area of analysis is extensive, and the cumulative impact may

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manifest itself on a larger scale than the project's footprint, including in the vicinity of neighbouring Natura 2000 sites and in a cross-border context.

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Environmental component / aspect	Current situation	Effects generated by the project	Impact generated by the project	Potentially affected receptors	Project characteristics with which the analysed project may generate cumulative impact
Biodiversity	Predominantly agricultural landscape (arable land, linear agricultural features), with generally human-modified habitats; no overlap with protected areas.	During construction: clearing/excavation, traffic, noise; during operation: turbine operation (yaw system), maintenance.	Predominantly local and isolated: habitat loss/alteration (isolated), temporary disturbance; during operation, risk to flying fauna (bird collisions; bat collisions/barotrauma) and avoidance/barrier effect.	Birds, bats, reptiles and small mammals (especially during construction); biodiversity associated with linear features (valleys/canals).	Cumulative impact with other wind farms/energy projects in the region (additive risks to birds/bats), with power lines/linear infrastructure and with existing agricultural pressures (fragmentation/disturbance).
Protected natural areas / Natura 2000	The project does not intersect with Natura 2000 sites; there are sites in the vicinity, including cross-border sites (Bulgaria).	Indirect effects through species mobility (particularly birds/bats) and physical factors (noise/light) assessed in a cross-border context.	No direct impact through overlap; potential indirect impact controlled through operational measures and monitoring; requires compliance with cross-border conditions.	Nearby ROSCI/ROSAC and ROSPA sites; neighbouring Bulgarian BG sites; Natura 2000 target species (especially birds/bats).	Cumulative effects with other projects in the area of influence that may affect the same sites/species (wind power + energy/transport infrastructure), particularly during sensitive periods (migration/dispersal).
Air quality (air quality)	Typical rural area quality; current sources: agricultural activities, local traffic.	During construction: dust from earthworks/transport, exhaust fumes; during operation: insignificant emissions (only	Temporary, local, reversible (during construction); low/negligible impact during operation.	Local population (particularly near work areas), local vegetation (dust deposition).	Cumulative impact with other local construction sites/investments and seasonal agricultural activities (dust episodes),

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Environmental component / aspect	Current situation	Effects generated by the project	Impact generated by the project	Potentially affected receptors	Project characteristics with which the analysed project may generate cumulative impact
		maintenance traffic).			plus regional traffic.
Noise and vibrations	Rural background noise; current sources: low traffic, agricultural machinery.	During construction: heavy machinery, transport; during operation: aerodynamic/mechanical noise from turbines + maintenance traffic.	Construction: temporary/local; operation: permanent local, with the need to comply with limits at receptors.	Homes/neighbouring settlements, sensitive wildlife (during construction/operation), including cross-border receptors if in the vicinity.	Cumulative impact with other wind farms/industrial installations and road traffic; cross-border – need for monitoring at the border (in accordance with the conditions communicated by the Bulgarian side).
Soil and subsoil	Soils used for agricultural purposes; susceptible to local compaction caused by traffic/machinery.	Stripping, excavation, foundations, roads/platforms; risk of accidental spills; temporary storage.	Permanent (infrastructure footprints) and temporary (site layout/ditches); local accidental risk (oil spills) manageable through measures.	Agricultural soil, soil biota; landowners/agricultural uses.	Combination with other land uses/infrastructure and agricultural pressures (compaction/erosion), plus parallel construction sites.
Surface water / hydrology	Local watercourses/valleys and linear features (canals/valleys); area-specific hydrological regime.	Localised works (ditches, crossings), site runoff; risk of accidental pollution; minimal effects during operation.	Local/temporary impact during construction (particularly where crossings/discharge points exist); minimal impact during operation, subject to maintenance and water management.	Local watercourses/valleys, areas with drainage potential; fauna associated with wetland microhabitats.	Cumulative effects with agricultural works/local developments and other projects that alter runoff/erosion; diffuse agricultural pressures.
Groundwater	Local uses; vulnerability linked to	Accidental risk (fuel/oil spills) during	Under normal conditions: insignificant; in an accidental scenario: local,	Local water table, local users (if there are	Combination with other potential sources of

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Environmental component / aspect	Current situation	Effects generated by the project	Impact generated by the project	Potentially affected receptors	Project characteristics with which the analysed project may generate cumulative impact
	accidental point source pollution.	construction/maintenance; no significant operational impact.	preventable through measures (retention/sealing/kits).	abstractions in the area).	pollution (agriculture, other construction sites/developments).
Waste	Typical rural waste streams; managed by service providers/contractors.	Construction: construction waste, packaging, metal, wood, excavated soil (non-hazardous) + hazardous fractions (oils/absorbents). Operation: maintenance waste (oils/filters/packaging) + household waste.	Impact controllable through separate collection, compliant temporary storage and handover to authorised operators; risk only in the event of non-compliant management.	Soil/water (in the event of non-compliant storage), public health (odour/hygiene).	Accumulation with other sites and local waste streams if there is limited collection/transport capacity; requires logistical planning.
Landscape / visual impact	Open agricultural landscape, high visibility; existing man-made features (roads/infrastructure).	Introduction of vertical elements (turbines), stations, roads; alteration of the landscape at local and regional scale.	Permanent, visually significant (but without direct physical impact on protected habitats); may influence landscape perception.	Population, road users, tourists; cross-border observers (depending on the field of view).	Cumulative impact with other wind farms/energy facilities in Dobrogea (visual 'crowding' effect).
Intermittent shadow flicker / light	Normal rural conditions, low lighting; proximity to the border requires attention to lighting	Shadow flicker from blades; safety lighting/signalling; potential reflections if finishes are unsuitable.	Local, dependent on distance and orientation; manageable through design and operational rules; cross-border projects require a dedicated assessment of light effects and	Homes/sensitive receptors; nocturnal wildlife; receptors in nearby Bulgarian settlements (if exposed).	Cumulative effects with other wind farms (multiple light/signalling sources) and with existing lighting/infrastructure; potential cross-border

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Environmental component / aspect	Current situation	Effects generated by the project	Impact generated by the project	Potentially affected receptors	Project characteristics with which the analysed project may generate cumulative impact
	effects.		monitoring at the border.		effect.
Non-ionising radiation / interference	Typical levels for existing electrical infrastructure; perceived sensitivity at property boundaries/borders.	EMF fields from electrical equipment and connection networks; possible local interference (depending on design).	Generally low and within limits; requires verification/monitoring in accordance with the conditions imposed in a cross-border context (at the border).	Population (perception/exposure), communications equipment (if in the vicinity).	Cumulative effect with other power lines/stations in the area (field overlap), particularly in energy corridors.
Population and human health	Rural community, low density; limited current pressures (agriculture/local traffic).	Construction: dust, noise, traffic, risk of accidents; operation: noise, shadow flicker, visual perception; socio-economic benefits (jobs, taxes).	Local/temporary negative impact during construction; during operation, impact conditional on compliance with limits and management of light effects; potential positive socio-economic impact.	Residents of Cerchezu and surrounding areas; road users; cross-border recipients (depending on noise/light at the border).	Cumulative impact with other projects if there are overlaps in construction sites, traffic and noise/light pollution; cross-border – monitoring and reporting to the Bulgarian side regarding noise/radiation/light.

How it complies with health protection zones and environmental protection objectives in the area regarding air, water, soil, etc.

– health protection zones and environmental protection objectives in the area regarding air, water, soil, etc. are complied with.

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Biodiversity

Protected areas

Within 5 km of the project site, three natural areas of Community interest have been identified:

- 1 site located in Romania: ROSAC0071 (ROSCI0071) Dumbrăveni – Urluia Valley – Vederoasa Lake, at a distance of approximately 2.79 km from the project boundary;
- 2 areas located within Bulgaria – BG0000569 Kardam (Bulgaria), situated approximately 410 m from the project boundary, and BG0000570 Izvorovo – Kraishte, situated approximately 3.64 km from the project boundary.

Within the project implementation area, at distances ranging from 5 to 20 km, there are 5 protected natural areas:

- 5 protected areas for bird conservation:
 - ROSPA0166 Plopeni-Chirnogeni, 6.21 km from the project boundary
 - ROSPA0036 Dumbrăveni, located 7.07 km from the project boundary
 - ROSPA0094 Hagieni Forest, 18.39 km from the project boundary
 - ROSPA0151 Ciobănița-Osmancea, 18.55 km from the project boundary
 - ROSPA0001 Aliman – Adamclisi, 19.12 km from the project boundary
- 2 protected natural areas of Community interest:
 - ROSAC0157 Hagieni Forest – Cotul Văii, 13.81 km from the project boundary
 - BG0000130 Kraymorska Dobrudzha (Bulgaria) at a distance of 11 km from the project boundary

THE REASONS FOR THE DECISION TO INCLUDE THE PROJECT IN THE APPROPRIATE ASSESSMENT PROCEDURE ARE AS FOLLOWS:

The project site is located approximately 2.8 km from the boundary of the ROSAC0071 Dumbrăveni - Urluia Valley - Vederoasa Lake site, and approximately 6.3 km from ROSPA0166 Plopeni - Chirnogeni, approximately 7.2 km from ROSPA0036 Dumbrăveni, approximately 14.4 km from ROSAC0157 Hagieni Forest - Cotul-Văii, approximately 18.6 km from ROSPA0094 Hagieni Forest, ROSPA0151 Ciobănița Osmancea, approx. 19.4 km from ROSPA0001 Aliman-Adamclisi, at a distance of approx. 410 m from the BG0000569 Kardam protected natural area and at a distance of approx. 3.64 km from the BG0000570 Izvorovo – Kraiste protected natural area;

Through the implementation of the impact mitigation measures from the SEA at the PUZ stage, for which the regulatory procedure was completed and DJMCT Opinion No. 8/20.11.2025 was issued "the potential uncertainties identified at the time of drafting the presentation report, prepared prior to the completion of the strategic environmental assessment at the PUZ stage, have been eliminated"

The conclusions regarding the description and quantification of impacts, as well as the reasons why it is not necessary to continue the procedure by moving to the appropriate assessment study stage, according to the presentation report, are:

1. Direct loss due to the reduction in the area covered by the habitat as a result of its physical destruction

The project elements are located outside the ANPIC; therefore, there will be no such impact on habitats within protected natural areas.

2. Loss of breeding, feeding and resting habitats for species

The project elements do not overlap with protected areas. All interventions necessary for the construction/operation/decommissioning of the facility are carried out outside the ANPIC, so there will be no loss of breeding, feeding and resting areas for species within the protected areas.

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3. Alteration/degradation through deterioration of habitat quality, leading to a reduced abundance of characteristic species or to changes in the structure of the biocoenosis (species composition)

The project will not generate effects leading to the degradation and deterioration of habitats within the ANPIC, as no flora sensitive to external factors or of conservation value has been identified in the vicinity of the project or within the ANPIC.

4. Alteration/degradation through the deterioration of species' breeding, feeding and resting habitats

The implementation of the project will not lead to alteration/degradation through the deterioration of breeding habitats within the ANPIC, as all project elements are located outside the protected natural areas.

It is considered that by keeping the habitats within the protected area intact and thereby meeting the species' feeding and nesting needs, the activities within the project, on land on which the species are not dependent, will not cause changes to the species' distribution pattern within the area.

5. Disturbance due to changes in existing environmental conditions: displacement of species individuals, behavioural changes in species

During the construction period, there will be disruption to the activity of local species, and avoidance of areas in the vicinity of the work sites, but without causing the displacement of species at the ANPIC level.

6. Fragmentation through the creation of physical or behavioural barriers in habitats that are physically or functionally connected, or through their division into smaller, more isolated fragments

The area covered by the project is located outside the ANPIC, so there is no fragmentation of habitats within protected areas as a result of the project works.

7. Reduction in population numbers as a result of direct mortality caused by the PP or as a result of other forms of impact

The habitats within the area are of higher quality than those in the project site area.

8. Other indirect impacts through indirect changes to environmental quality

The probability of accidental situations occurring is extremely low and may manifest locally, at the site of the accident, within the project perimeter or along access roads, without the risk of generating effects on the surrounding areas or altering the parameters of the ANPIC conservation objectives.

9. Identified uncertainties

Through the implementation of the impact mitigation measures from the SEA at the PUZ stage, for which the regulatory procedure was completed and DJMCT Opinion No. 8/20.11.2025 was issued "the potential uncertainties identified at the time of drafting the presentation report, prepared prior to the completion of the strategic environmental assessment at the PUZ stage, have been eliminated".

The project does not involve the use of resources on which biological diversity depends, within protected natural areas of Community interest.

The impact of the project on the conservation objectives, communicated by ANANP and approved by MMAP, has been assessed through:

➤ **Decision No. 414 of 03.08.2022** on the approval of the Methodological Guidelines for the implementation of the conservation objectives in the Annex to Order No. 1577/2016 on the

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approval of the Management Plan and Regulations for the protected natural areas ROSCI0071 Dumbrăveni – Urluia Valley – Vederoasa Lake, ROSPA0036 Dumbrăveni, ROSPA0001 Aliman – Adamclisi, ROSPA0007 Vederoasa Pond, 2.361 Dumbrăveni Forest, 2.350 The limestone cliffs at Petrosani – Deleni Commune, 2.351 Aliman fossil site and IV.30 Vederoasa Lake

➤ **Decision No. 219 of 04.07.2024** approving the Methodological Guidelines for the implementation of the conservation objectives in Annex 1 to OMMAP No. 1480/2016 approving the Management Plan and Regulations for protected natural areas ROSCI0157 Hgieni-Cotul Văii Forest, ROSPA0094 Hagieni Forest and 2.360 Hgieni Forest, for the site ROSPA0094 Hagieni Forest

➤ **Decision No. 118 of 8 May 2020** approving the Methodological Guidelines for the implementation of the conservation objectives set out in the Annex to Order No. 1480/2016 of the Minister of the Environment, Water and Forests approving the Management Plan and Regulations for the protected natural areas ROSCI0157 Hagieni Forest - Cotul Văii, ROSPA0094 Hagieni Forest and 2.360 Hagieni Forest;

➤ **Decision No. 197 of 26 June 2020** amending Annex 1 and Annex 2 to **Decision No. 118 of 8 May 2020** on the approval of the Methodological Guidelines for the implementation of the conservation objectives set out in the Annex to Order No. 1480/2016 of the Minister of the Environment, Water and Forests on the approval of the Management Plan and Regulations for the protected natural areas ROSCI0157 Hagieni Forest - Cotul Văii, ROSPA0094 Hagieni Forest and 2.360 Hagieni Forest;

➤ **Decision No. 426 of 24 September 2020** amending items 62 C0* Ponto-Sarmatian steppes and 4067 Echium russicum in Annex 1 and Table "2.1. Species associated with open/agricultural land in Annex 2 to **Decision No. 197 of 26 June 2020** amending Annex 1 and Annex 2 to **Decision No. 118 of 8 May 2020** on the approval of the Methodological Guidelines for the implementation of the conservation objectives in the Annex to Order No. 1480/2016 of the Minister of the Environment, Water and Forests on the approval of the Management Plan and Regulations for the protected natural areas ROSCI0157 Hagieni Forest - Cotul Văii, ROSPA0094 Hagieni Forest and 2.360 Hagieni Forest;

➤ **Note No. 9864/BT/2053/06.04.2022** regarding the approval of the minimum set of special measures for the protection and conservation of biological diversity, as well as the conservation of natural habitats, wild flora and fauna, and the safety of the population and investments in ROSPA0151 Ciobănița-Osmancea;

➤ **Note** No. 8914/BT/1788/28.03.2022 regarding the approval of the minimum set of special measures for the protection and conservation of biological diversity, as well as the conservation of natural habitats, wild flora and fauna, and the safety of the population and investments in ROSPA0166 Plopeni-Chirnogeni.

The following provisions shall be complied with:

Conditional favourable opinion No. **81 of 17 December 2025**, issued by A.N.M.A.P. in its capacity as the authority responsible for the management of protected natural areas.

➤ The Management Plan and Regulations for the protected natural areas ROSCI0071 Dumbrăveni - Urluia Valley - Vederoasa Lake, ROSPA0036 Dumbrăveni, ROSPA0001 Aliman - Adamclisi, ROSPA0007 Vederoasa Pond, 2.361 Dumbrăveni Forest, 2.350 The limestone cliffs at Petrosani - Deleni Commune, 2.351 Aliman Fossil Site and IV.30 Vederoasa Lake, approved by Order of the Minister of the Environment, Water and Forests No. 1557/2016;

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➤ The Management Plan and Regulations for the protected natural areas ROSCI0157 Hgieni-Cotul Văii Forest, ROSPA0094 Hagieni Forest and 2.360 Hgieni Forest, approved by OMMAP No. 1480/2016;

- Government Emergency Ordinance No. 57/2007, approved with amendments and additions by Act No. 49/2011, with subsequent amendments and additions. It is prohibited, for all species, to keep, kill, hunt or capture them, as well as to disturb them during the breeding season, the rearing of young and migration;
- Government Decision No. 323/2010 establishing the system for monitoring accidental catches and killings of all bird species, as well as of strictly protected species listed in Annexes 4A and 4B to Government Emergency Ordinance No. 57/2007 on the regime of protected natural areas, the conservation of natural habitats, wild flora and fauna;
- All impact mitigation measures set out in the Appropriate Assessment Study, for which DJMCT Opinion No. 8/20.11.2025 was issued, will be complied with.

The proposed project has undergone a strategic environmental assessment for the Zonal Urban Plan, which is necessary for its development.

Assessment of potential significant environmental impacts (taking into account: cumulative impacts, assessment of alternatives, sustainable development aspects, the impact of related activities in a cross-border context with the Republic of Bulgaria for all environmental factors, including the cumulative impact with neighbouring wind farms located on Bulgarian territory, and the impact on public health) was detailed and analysed in the Appropriate Assessment Study and its annexes, in the Environmental Report and its annexes, and in the Bird Collision Study carried out for bird species.

Consequently, a series of mitigation measures have been proposed, such as:

- Conducting regular training for all personnel involved in construction/decommissioning works on general environmental issues, protected habitats and species, and measures to avoid and minimise impact. Particular attention shall be paid to aspects relating to the prohibition of collecting plants and animals or the deliberate wounding/killing of protected species.
- Construction and installation works must be planned so as to take place outside the breeding and rearing seasons of species of Community interest, regardless of the presence or absence of nests on site. The planning of activities shall take into account the biological calendar of the species concerned to prevent any negative impact on them
- Regular mowing of vegetation around the turbines to maintain a low abundance of insect species that serve as a food source for both bats and bird species
- To reduce the risk of mortality, it is proposed to limit the turbines (T47, T46, T35, T36, T34) to a wind speed of 6.5 m/s during the sensitive period (migration), from half an hour before sunset until sunrise, and bat protection systems that emit ultrasonic deterrent signals to drive bats away from the rotation area. The measure will be implemented from the first year of the wind farm's operation.
- Installation of radar systems and day and night-vision cameras (on the T8, T18, T29, T32 and T37 turbines) to detect and prevent the risk of bats colliding with wind farm structures.
- The diversion signalling system must be installed from the first year of operation of the wind farm.

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Transboundary impact

Given the nature of the project, its location and its characteristics, we consider that there is a potential for direct or indirect cross-border impacts. The distance between the project and the border between Romania and the Republic of Bulgaria is less than 100 m.

Accordingly, each environmental component likely to be affected by the construction and operation of the project has been analysed, with the information described below.

Population and human health

The wind farm is being developed within the Cerchezu local administrative area, outside its built-up area; the nearest settlements on Bulgarian territory are the village of Iovkovo, 1.56 km from turbine T3, and the village of Kraiste, 2.1 km from turbine T47.

Iovkovo and Kraiste are two villages in the municipality of General-Toshevo, Dobrich region, Southern Dobruja, Bulgaria^{38F1}.

As regards the total population of the municipality of General Toshevo as at 31 December 2023, it stands at 5,429, of whom 2,634 are male and 2,795 are female. Compared to 2011, in 2023 the female population of Ggeneral-Toșevo decreased by approximately 21%, and the male population by 22%^{39F2}. The population structure by age group and sex as at 31 December 2023 in the Dobrich region is presented in the table below:

The construction and operation of the wind farm in the outlying areas of the municipality of Cerchezu will not affect the population within Bulgarian territory. As outlined in the previous chapters, during the construction phase, noise, vibrations and dust emissions will be localised and temporary, with a limited impact. During the operational phase, the noise produced by the turbines will be below 40 dB in the receiving areas, complying with legal limits. The shadow flicker effect is insignificant, and the visual impact is subjective. During the decommissioning phase, the impact will be similar to that during the construction phase, being local and temporary.

Biodiversity

Within 5 km of the project, **two areas of Community importance in Bulgaria** have been identified: BG0000569 Kardam, located approximately 410 m from the project boundary, and BG0000570 Izvorovo – Kraishte, located approximately 3.64 km from the project boundary.

A significant negative impact is anticipated on certain species within the protected natural areas: ROSCI0071/ROSAC0071 Dumbrăveni – Urluia Valley – Vederöasa Lake, ROSCI0157/ROSAC157 Pădurea Hagieni - Cotul Văii, ROSPA0036 Dumbrăveni, ROSPA0166 Plopeni-Chirnogeni, ROSPA0094 Hagieni Forest-Cotul Văii, BG0000569 Kardam, BG0000570 Izvorovo – Kraishte. The groups likely to be significantly affected by the implementation and operation of the wind energy project will be terrestrial mammals, bats and birds.

Soil/subsoil

The northern part of Bulgaria, on the border with Romania, is relatively developed and has predominantly fertile soils. The distribution of land-use categories within the project area, on Bulgarian territory in the vicinity of the proposed project, comprises an area of arable land (predominant), with small patches of deciduous forest, predominantly agricultural land mixed with natural vegetation, discontinuous urban areas, and industrial or commercial sites.

With regard to the impact on soil and subsoil, **there is no significant impact on soil and subsoil in the neighbouring Bulgarian territory.** During the construction phase, the impact on soil is temporary and reversible, limited to the perimeter of the construction works (on Romanian territory). Any potential

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sources of pollution from vehicle and machinery operations are monitored and controlled to prevent contamination. Furthermore, wind turbines have a reduced footprint compared to other forms of energy, which limits soil erosion and compaction.

During operation, the wind farm does not generate pollutants that affect soil or subsoil quality, thereby ensuring long-term environmental protection.

Water

The nearest surface water bodies identified in the project area within Bulgaria are located south of the site boundary: BG1DJ900R1015 at a distance of approx. 1 km, BG2DO700L017 at a distance of approx. 34 km, and BG2BS000C001 at a distance of approx. 36 km, south-east of the site boundary.

The project area is situated in the vicinity of two groundwater bodies in Bulgaria (BG1G000000N049 and BG1G0000J3K051).

The construction and operation of the Cerchezu wind farm do not involve the abstraction of water from groundwater or surface water sources within the site area; therefore, there will be no impact on the hydrology of the area, nor will other activities dependent on this resource be indirectly affected.

The construction of the wind farm outside the built-up area of the municipality of Cerchezu **will not have a significant negative impact on the quality of surface or groundwater bodies in Bulgaria.**

Air

According to information published in the area of Bulgaria adjacent to the project site (Northern region), the following aspects have been highlighted:

- Sulphur dioxide (SO₂): According to reports for the fourth quarter of 2022, SO₂ limits were not exceeded.
- Nitrogen dioxide (NO₂): NO₂ levels were within permissible limits and did not show any significant exceedances.
- Fine particulate matter (PM₁₀ and PM_{2.5}): Problems relating to PM₁₀ pollution persisted, with occasional exceedances of the standards, particularly during the cold season.

As can be seen above, no significant exceedances of the limit values set by the legislation in force in Bulgaria were observed in the project implementation area.

Taking into account current activities, air quality can be considered generally good, as it is an open rural area uncluttered by urban development and without intensive industrial activity.

The construction of the wind farm outside the built-up area of the municipality of Cerchezu **will not have a significant negative impact on air quality in Bulgaria.** During the construction phase, dust emissions from excavation works, vehicle movements and the handling of construction materials, as well as emissions of pollutants specific to the combustion of fossil fuels associated with machinery and transport, represent the main sources of emissions. Erosion caused by excavation works may also affect local air quality

During the operational phase, wind turbines help reduce greenhouse gas (GHG) emissions by replacing a quantity of electricity generated from fossil fuels, thereby contributing to the mitigation of climate change and having a significant positive impact on air quality.

Noise and vibrations

During the construction phase, the transport and machinery used, as well as activities at the worksite, will generate noise and vibrations. However, given that the area is crossed by local roads and is used for agricultural purposes, the impact will be local, temporary and insignificant, **with no impact on the territory of neighbouring Bulgaria.**

During operation, the noise produced by wind turbines will increase with wind speed and the rotational speed of the blades. The modern turbine design includes nacelle insulation to prevent the transmission of mechanical noise and vibrations. The noise level varies between 92 and 107.7 dB, and noise modelling shows that in the reception areas the level will be below 40 dB.

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Thus, the construction and operation of the wind farm **will not generate significant noise and vibrations that would affect the territory of Bulgaria**. Mitigation measures, such as the strategic placement of the turbines and the use of modern technologies, will reduce noise and vibration emissions. Consequently, communities and the environment in Bulgaria will not be affected.

Cultural heritage

No data sources have been found that comprehensively list all historical monuments in Bulgaria by region, as is the case in Romania. However, the construction of the proposed wind farm will not affect Bulgarian territory, thereby ensuring the preservation of the country's cultural and historical heritage.

In accordance with Act 22/2001 on the ratification of the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the Aarhus Convention), it is essential to ensure full transparency and the involvement of the local and cross-border community at all stages of the project. This includes access to relevant information regarding environmental and health impacts and the active participation of the public in the decision-making process. Compliance with this Act ensures that all stakeholders are informed and have the opportunity to contribute to decision-making, thereby ensuring effective and equitable management of environmental impacts.

Landscape

According to the map showing the characteristic landscape types of the area where the project is proposed, it can be seen that the landscape types in the project area are similar for both countries, as follows:

- Continental landscape – this area consists of hills and arable land with sedimentary soils. It predominates across most of the project's coverage area.
- Steppe landscape – this area comprises a steppe landscape with hills and sedimentary soils.

Land fragmentation and relief are essential for understanding potential environmental impacts and for planning infrastructure projects.

Within Bulgaria, in the vicinity of the project perimeter, very low fragmentation predominates. The relief is moderately fragmented, suggesting the presence of low hills and valleys. This type of landscape can support diversified agricultural activities and exhibits moderate biodiversity.

The construction and operation of the wind farm in the outlying areas of the municipality of Cerchezu will not affect the landscape within Bulgarian territory.

Use of natural resources

The implementation of the wind farm project in the municipality of Cerchezu, Romania, offers an opportunity to harness renewable energy resources. The following quantities of resources will be used for the construction of the wind farm: topsoil from stripping (approximately 108,600 m³), natural soil from excavation (24,350 m³), crushed stone fill (114,250 m³), and insignificant quantities of water for various on-site activities.

The construction of the wind farm **will not utilise natural resources from Bulgarian territory, nor will it affect its natural resources**. All resources required for the project will be extracted and managed within Romanian territory. Thus, Bulgarian soils and subsoils will remain unaffected by activities related to the construction and operation of the wind farm in the outlying areas of the municipality of Cerchezu.

Waste management

As part of the implementation of the wind farm project in the commune of Cerchezu, Romania, appropriate waste management will be ensured through the proper collection, storage and disposal of waste. The waste generated will include construction materials, packaging and household waste, all managed in accordance with Romanian legislation. No waste will be transported to or managed within

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Bulgaria, thereby ensuring that **Bulgaria's resources and environment will not be affected by activities related to the construction and operation of the wind farm.**

Climate change

Bulgaria's national climate policy is determined, on the one hand, by the country's international commitments arising from the United Nations Framework Convention on Climate Change (UNFCCC), the Kyoto Protocol (KP) and the Paris Agreement, which provide the general framework for international efforts to address the challenges posed by climate change, and, on the other hand, by the obligations arising from the country's EU membership and from current and recently adopted European legislation in this field.

As an EU Member State, Bulgaria has committed to reducing greenhouse gas (GHG) emissions by 55% by 2030 compared to 1990 levels, as part of the EU's objective to achieve climate neutrality by 2050 40F³.

According to the National Report on the State and Protection of the Environment in Bulgaria^{41F⁴}, **major GHG emissions** for the period 1988–2021 are trending downwards. In 2021, total GHG emissions amounted to 53,917.27 Gg CO₂-eq. This means that GHG emissions have decreased by 52.55% compared to emissions in the reference year 1988.

The National Report on the State and Protection of the Environment in Bulgaria^{42F⁵} has the following characteristics regarding climate factors:

- **average annual temperature** – between 1988 and 2021, the average annual air temperature for the lower part of the country fluctuated between 10.6°C and 13.3°C, as shown in the graph below
- **average annual precipitation** – between 1988 and 2021, for regions at altitudes of up to 800 m, this ranged from 377 mm to 1,013 mm, whilst maintaining an upward trend for this indicator (+4.2 mm/year). In 2021, average annual precipitation was 741 mm, which is approximately 20% above the average for the period 1991–2020.
- **Snow** – between 1988 and 2021, no significant downward trend was recorded in fluctuations in the average maximum snow depth in areas at altitudes between 800 and 1,800 m. The figure for 2021 is 43 cm – below the average for the period 1991–2020.

Climatic phenomena – between 8 and 12 January 2021, torrential and river flooding was recorded, mainly in western and south-eastern Bulgaria, due to heavy rainfall, combined in some places with snowmelt. In the districts of Sofia, Blagoevgrad, Yambol and Burgas, the amount of rainfall over 72 hours exceeded the monthly average threefold. A state of emergency due to flooding, destroyed bridges and damaged roads was declared in eight districts. Heavy snowfall in north-western Bulgaria led to power cuts in many places.

A comprehensive analysis of the construction, operation and decommissioning phases shows that, at the border, noise, air quality, water and other environmental parameters remain consistently below the limit values permitted by European standards, meaning that the project does not pose any significant risks to the population or ecosystems of the neighbouring country.

To clarify the extent to which the operation, construction and decommissioning of the wind farm may affect the health of the population in the neighbouring country, the following paragraphs summarise the results of noise, air, water and vibration modelling, relative to internationally established safety thresholds and European legislation, as well as any associated climate benefits.

A. Noise and vibrations

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Construction / decommissioning. The SoundPLANnoise modelling shows that, at the most exposed point in the Romanian municipalities, the equivalent continuous level reaches ≈ 36 dB(A) – below the 55 dB(A) limit during the day and more than 1 km from the border; the area where 55 dB(A) might be exceeded is limited to < 5 ha, directly at the construction site and up to 300 m from it.

Operation. After commissioning, the cumulative noise from the 46 turbines is modelled at < 40 dB(A) in villages and at 27 dB(A) at the Natura 2000 site BG0000569 "Kardam" in Bulgaria, i.e. +0.2 dB above the natural background and well below the WHO guideline of 40 dB(A) at night. The calculated increase in the nearest households is only 0.008–0.016 dB – clinically imperceptible.

Thus, the potential cumulative impact of the plan on activities in the area (agriculture surrounding the plan, transport infrastructure – Road II-29 Dobrich–border – 1.5 km, and energy infrastructure – Karnobat wind farm – 5.6 km) will be low to insignificant.

Health implications. The literature cited in the report mentions cardiovascular effects at chronic exposures > 45 dB(A); the value at the border (27 dB(A)) remains ~ 18 dB below this threshold, resulting in a practically zero risk to the Bulgarian population.

B. Air quality

Construction activities produce dust and exhaust fumes, but ADMS modelling indicates a contribution below the detection limit at the boundary; locally, the background PM₁₀ level in the municipality is ~ 12 $\mu\text{g}/\text{m}^3$, i.e. less than half the European limit of 40 $\mu\text{g}/\text{m}^3$.

During operation, the turbines do not generate pollutants, and the energy produced replaces gas or coal-fired generation, reducing regional emissions.

Thus, the potential cumulative impact of the project on activities in the area (agriculture surrounding the project, transport infrastructure on Road II-29 Dobrich–border – 1.5 km, and energy infrastructure – Karnobat wind farm – 5.6 km) will be low and insignificant.

Health implications. Additional exposure to particulate matter and NO₂ is practically zero.

C. Drinking water and surface water

Construction activities do not involve process discharges; rainwater is collected in gutters and infiltrates on-site. There is no connection to transboundary water bodies, and monitoring by the Constanța Public Health Directorate shows drinking water parameters in compliance throughout the municipality of Cerchezu.

During the operational phase, maintenance work is carried out on platforms equipped with retention trays sized to fully collect any oil spills, thereby eliminating any discharge of liquid substances into the environment.

Consequently, the cumulative impact with activities in the area (agriculture surrounding the site, transport infrastructure on Road II-29 Dobrich–border – 1.5 km, and energy infrastructure – Karnobat wind farm – 5.6 km) is insignificant, as there is no transport vector for contaminants towards Bulgaria.

Health implications. The safety of drinking water sources in the neighbouring country remains unaffected.

D. Soil and seismic vibrations

During the construction phase, limited excavation and isolated foundations are carried out; the excavated soil remains on site, and machinery vibrations are temporary.

During operation, no ground works are carried out, and the vibrations generated by the turbines dissipate rapidly into the geological strata, falling below the threshold of human perception by the time they reach the border.

Cumulative potential. The sum of all sources does not exceed 0.2 mm/s at the boundary, so the effect remains insignificant.

E. Shadow flicker and visual impact

Modelling indicates 0.1–8 h/year of intermittent shadowing at the nearest Romanian households; at the boundary, the duration falls below the detection limit. The Karnobat wind farm adds an apparent angle of only 0.3–0.4°, insufficient for shadow overlap.

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Cumulative potential: even if both wind farms were to cast shadows simultaneously, the total would remain < 10 h/year, well below the international threshold of 30 h/year, resulting in a negligible cumulative visual impact.

F. Traffic and road pollution

Increased traffic on DJ 391 during the construction phase adds < 3 µg/m³ NO₂ and < 2 µg/m³ PM₁₀, levels which dissipate before reaching the neighbouring country's border.

During operation, service visits amount to only a few vans per day, and during decommissioning the flow of lorries is lower than during construction and limited in time.

Health implications. Pollutant concentrations remain below the limit values set at European level; thus, there are no exceedances of the existing values in Bulgarian communities.

G. Climate benefit, with an indirect effect on health

The installed capacity (≈ 303 MW) will avoid ~0.55 Mt CO₂ at regional level over its lifetime, reducing the risk factors associated with mortality from fine particulate matter and heatwaves

During construction and decommissioning, CO₂ emissions from machinery diesel are sporadic and small compared to the total carbon savings.

Health implications. By contributing to the decarbonisation of the regional energy mix, the project reduces the population's exposure to fossil-fuel-derived air pollutants and limits the intensity of extreme heat events; these factors, which are epidemiologically linked to the incidence of cardiovascular and respiratory diseases, are mitigated, thereby supporting increased life expectancy and reduced public health costs on both sides of the border.

A comparative assessment of the three phases shows that:

- Construction causes local and temporary disturbances (dust, noise, inert waste), but these dissipate before reaching the border; there are no recorded breaches of international standards for air quality or noise, and water works are managed through horizontal drilling and contingency plans.
- Operation exerts the least pressure: the turbines do not emit liquid or gaseous pollutants, the noise calculated at the boundary is 18 dB below the maximum permissible threshold, and the project generates a net climate benefit by avoiding the use of fossil fuels.
- Decommissioning replicates the disturbances associated with construction, but over a shorter period and with the possibility of recycling over 90% of the dismantled materials; transport and waste treatment are managed exclusively within the country, eliminating the cross-border aspect.

Consequently, for no combined environmental factor over the life cycle are the maximum permissible values at European level exceeded. The effects remain local, temporary and of low intensity, and in terms of climate and energy, the balance is positive for both countries. **Thus, the project has an insignificant cross-border impact throughout its operational life.**

A detailed analysis of the project's impact on biodiversity components for the two areas within Bulgarian territory was carried out in the Appropriate Assessment Study prepared during the Detailed Land Use Development Plan (PUZ) phase, as well as in the annexes to this study, and was submitted to the Bulgarian side as part of the environmental impact assessment procedure in the cross-border context with Bulgaria for the PUZ phase; In letter No. 99-00-268-22/26.06.2025 from the Ministry of Environment and Water of the Republic of Bulgaria, it was stated that, "*The impact assessment of the project to construct the 46 turbines near the border with Bulgaria is objective and the proposed measures are sufficient to minimise/eliminate the negative impact on biodiversity and, in particular, on the Natura 2000 protected areas.*"

The environmental impact assessment procedure in a cross-border context at the Detailed Land Use Development Plan (PUZ) stage has been concluded following the analysis of all studies and requests for clarification. The Ministry of Environment and Water of the Republic of Bulgaria, by letter No. 99.00.268-40/17.09.2025, has communicated the mandatory conditions to be included in the regulatory act to be issued by the relevant authorities in Romania for the investment in question, both during the planning and design phases and regarding the monitoring measures following the implementation of the investment proposal, i.e. after the construction of the proposed investment, namely:

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„ 1. *“Wind Farm 48 (46) wind turbines, transformer stations, electrical connection networks, construction and modernisation of communication and access roads” – shall be implemented in compliance with all the measures set out in the submitted Environmental Report, with a view to preventing, reducing and eliminating adverse effects on the environment, the living environment and public health, as a result of the project’s implementation;*

2. *Given that the energy park is located in the immediate vicinity of the border with the Republic of Bulgaria, an assessment of the impact of physical factors in a cross-border context, in particular light effects, will be carried out during the design phase. The assessment will be forwarded to the Republic of Bulgaria;*

3. *The paint used for the wind turbines (tower and yaw system) must be of the ‘absorbent’ type, so as not to create conditions for reflections of incident light;*

4. *Following the implementation of the investment proposal, controlled monitoring of noise levels, non-ionising radiation and light effects at the border with the affected Bulgarian municipalities shall be ensured. The results of the monitoring shall be forwarded to the Republic of Bulgaria.”*

The conditions imposed by the Bulgarian Government were included in Environmental Notice No. 8/20.11.2025, issued by the Constanța County Directorate for Environmental Protection, a document which was translated into Bulgarian and English and forwarded, in accordance with the procedures in force, to the Ministry of Environment and Water of the Republic of Bulgaria.

Furthermore, regarding condition No. 2 mentioned above, the Shading Study was submitted, the conclusions of which indicate that the results show a negligible impact on the analysed area, including in the case of cross-border roads and the assessed receptors, a conclusion supported by the use of a conservative modelling scenario, based on the largest turbine configuration and an extended analysis radius.

The measures and conditions for implementing the project in accordance with Water Management Notice No. 20 dated 27 March 2026, issued by the DOBROGEA LITORAL BASIN WATER ADMINISTRATION, are:

- All necessary approvals and authorisations shall be applied for and obtained in accordance with the law.
- During the execution of the works, the quality of groundwater and surface water must not be affected.
- Crossing of watercourses shall not take place during periods of high water.
- No works shall be carried out in the minor riverbeds of the Cerchezu and Măgura watercourses, which are public property of the state and administered by the National Administration of Romanian Waters.
- It is prohibited to store any type of material in the riverbeds and protection zones of the Măgura and Cerchezu watercourses.
 - During the execution of works, the stability of the banks of the watercourses must not be affected. Upon completion of the works, the site shall be cleared of any obstacles, materials or other waste, and the land shall be restored to its original condition.
- The discharge of untreated wastewater into surface and groundwater is prohibited.
- The discharge of treated wastewater into the ground is not permitted.
- Responsibility for the design of the works lies entirely with the designer and the drafter of the technical supporting documentation.
- In the event of accidental pollution occurring during the execution of the works, the beneficiary shall bear full responsibility for the decontamination of the area and for covering any associated costs.
- The beneficiary shall assume all risks and damages in the event of damage caused by storms or floods. The Dobrogea – Litoral Water Basin Administration is not obliged to bear any such damages.
- The beneficiary is obliged to notify the Dobrogea-Litoral Water Basin Administration in writing of the start date of the works, 10 days in advance, as well as the date of their completion.
- It is prohibited to destroy or damage the units and installations of the national observation network, benchmarks, hydrometric gauges or other technical or topographical markers, hydrogeological boreholes, automatic water quality monitoring stations and the like.

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- **For the crossing of watercourses with cables, power lines, etc., fees shall be charged for the use of public land administered by the National Administration 'Apele Române', in accordance with Government Emergency Ordinance No. 52/2023.**
- To allow water management staff access to the site premises for the purpose of carrying out their inspection duties, in accordance with the provisions of the Water Act No. 107/1996, as amended and supplemented.
- **Upon completion of the investment, the beneficiary is obliged to apply for and obtain a water management authorisation, based on supporting technical documentation drawn up in accordance with the provisions of Order No. 3147/2023 of the Ministry of the Environment, Water and Forests regarding the approval of the procedure for issuing the water management authorisation.**

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III. CONCLUSIONS OF THE ENVIRONMENTAL IMPACT REPORT AND MEASURES TO PREVENT, MITIGATE AND, WHERE POSSIBLE, OFFSET SIGNIFICANT ADVERSE ENVIRONMENTAL IMPACTS:

The following tables present the matrix for assessing the social and economic impact, including on public health, for the construction and operational phases.

Table Assessment of the project's impact on the socio-economic environment, including public health (overall assessment, construction phase)

Stage	Interventions / activities	Effects	Impact	Form of impact	Nature of the impact	Cumulative potential	Duration	Frequency of occurrence	Extent	Probability	Reversibility	Assessment of the significance of the impact	Justification
Execution	Construction site mobilization and operation (site preparation, temporary platforms)	Temporary land occupation, presence of machinery	Temporary inconvenience to the public	Negative	Direct	Yes	Short	Temporary	Local	Likely	Reversible	Insignificant	Three temporary construction site mobilizations are planned for the implementation of the investments, located within the project perimeter on plots already demarcated and used exclusively for the duration of the works. Land occupation is limited in terms of area and duration, without affecting neighbouring uses or property. Activities carried out within the construction sites (temporary facilities, machinery traffic, waste management, lighting) may cause minor, temporary and reversible local disruption, without the impact extending beyond

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													the site area.
Site traffic (machinery, materials, components)	Increased traffic, dust and noise emissions	Temporary impact on residents' comfort	Negative	Direct	Yes	Medium	Intermittent	Local	Probable	Reversible	Insignificant		Traffic associated with construction may lead to temporary increases in noise and air emissions, with local and short-term effects, without exceeding the permitted limits in residential areas.
Excavation works, foundations and technical platforms	Noise, vibrations, dust emissions	Public discomfort	Negative	Direct	Yes	Moderate	Intermittent	Local	Probable	Reversible	Insignificant		The impact is specific to construction works, temporary and localised, with no significant effects on public health.
Use of existing roads	Temporary increase in infrastructure use	Temporary disruption to local traffic	Negative	Indirect	Yes	Short	Occasional	Local	Unlikely	Reversible	Insignificant		Existing municipal and agricultural roads will be used without structural alterations; any disruption will be temporary and limited.
Generation and management of construction waste (non-hazardous waste, packaging,	Waste generation, temporary storage	Local inconvenience / potential risk of pollution	Negative	Indirect	Yes	Short	Intermittent	Local	Unlikely	Reversible	Insignificant		Waste generated during the construction phase is predominantly non-hazardous and will be sorted, temporarily stored in designated areas and disposed of by authorised operators, in accordance with current legislation.

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household waste)														
Construction and installation activities	Creation of temporary jobs	Local socio-economic benefits	Positive	Direct	Yes	Short	Temporary	Local	Likely	Reversible	Insignificant	The construction phase may generate an insignificant positive impact through the use of local labour and ancillary services.		

Conclusions regarding the socio-economic impact, including public health during the construction phase:

The impact generated by the project will be felt predominantly at a local level, in the area of the turbine sites, the technical platforms, the construction sites and along the access roads used **during the construction phase**. The proposed activities do not have the potential to affect existing land uses or neighbouring property, and there is no risk of the impact extending beyond the project's area of influence.

The magnitude and complexity of the negative impact are low and limited to the construction phase, occurring **temporarily and locally in the areas covered by the project or in their immediate vicinity**. Through the technical solutions adopted, the appropriate organisation of the construction site and the implementation of prevention and control measures (waste management, use of existing roads, noise monitoring), the likelihood of significant negative effects on the population and human health is minimised.

During the construction phase, the risk of negative impacts on land uses and property in the areas where the wind farm components are located is low, given the temporary and reversible nature of the works, as well as the restoration of the temporarily used areas upon completion of the works.

Due to the measures provided for in the project, the execution of works specific to the wind farm will have an **insignificant**, local and reversible negative impact on public health, strictly limited to the period during which construction activities are carried out.

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Given the specific nature of the project and the nature of the works carried out, it is estimated that, during the **decommissioning** phase, the impact generated will be of the same nature, magnitude, extent and significance as that estimated during the construction phase.

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Table Assessment of the project's impact on the socio-economic environment, including public health (overall assessment, operational phase)

Stage	Interventions / activities	Effects	Impact	Form of impact	Nature of the impact	Cumulative potential	Duration	Frequency of occurrence	Extent	Probability	Reversibility	Assessment of the significance of the impact	Justification
Operation	Operation of wind turbines	Site-specific background noise	Potential noise discomfort	Negative	Direct	Yes	Long	Continuous	Local	Unlikely	Reversible	Insignificant	The noise level generated during operation remains below the permissible limits in residential areas, given the distance from sensitive receptors and the continuous monitoring of acoustic parameters.
		Shadow flicker	Temporary impairment of visual comfort	Negative	Direct	Yes	Long	Occasional	Local	Unlikely	Reversible	Insignificant	The shadow-flicker effect is limited in duration and intensity, being controlled through operational management measures, with no significant impact on the quality of life of the population.
	Current operation of the wind farm	Visual presence of the turbines	Landscape alteration	Negative	Indirect	Yes	Long	Permanent	Local	Probable	Irreversible	Low	Visual impact is subjective and does not directly affect public health or socio-economic activities, and is therefore considered to be of low importance.
	Operational and maintenance traffic	Reduced road traffic	Minor inconvenience	Negative	Indirect	Yes	Long	Occasional	Local	Unlikely	Reversible	Insignificant	Maintenance-related traffic is low in intensity and frequency, using existing roads, without significantly disrupting local traffic.
	Operation of the wind farm	Job retention	Local socio-economic benefits	Positive	Direct	Yes	Long	Permanent	Local	Probable	Reversible	Insignificant	Operational activities provide permanent jobs and local economic contributions, with positive effects of limited scope.
	Operation of ancillary	Waste generation	Potential impact on	Negative	Indirect	Yes	Long	Occasional	Local	Unlikely	Reversible	Insignificant	The waste generated during the operational phase is limited in quantity and will be managed in accordance

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The assessment of the impact on each environmental factor indicates that the proposed project will have a minor negative impact, which will be temporary during the construction works and localised within the project site area. Given that the project involves the occupation of land areas, there will be a permanent impact on the soil.

Probability of impact

In accordance with the details presented above, provided that the project specifications and the recommendations of this study are adhered to, the probability of environmental impact is low.

Duration, frequency and reversibility of the impact

In accordance with the details presented above, it follows that the environmental impact is temporary and reversible, with the exception of the soil, where the impact is permanent and irreversible in the areas where construction will take place, and reversible in the areas occupied temporarily.

Transboundary nature of the impact

Taking into account the objectives of the proposed project, as well as EU and international legislation regarding significant environmental effects, including on health, it is considered that the proposed project will not have a transboundary impact.

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Measures during the implementation/operation of the project (to be specified for: water, air, soil, subsoil, biodiversity/natural areas, noise, vibrations, waste, health risks, landscape, cultural and historical heritage, etc.) and the effect of their implementation:

WATER

- The abandonment or disposal of waste in watercourses is prohibited.
- It is prohibited to discharge/dump waste water, liquid or solid waste, fuels or lubricants into surface water, groundwater or onto land, as well as to store such substances and waste in water resource protection zones or sanitary protection zones.
- Materials used in the works and the waste generated shall not be stored in the vicinity of watercourses.
- The storage of materials and substances used during the construction period shall take place in specially designated areas, taking into account their condition and the risks they may pose to the environment. These shall not be located near watercourses.
- Work areas and construction site mobilizations shall be equipped with emergency response kits in the event of accidental pollution.
- Excavation work shall not be carried out in extreme weather conditions (rain, strong wind).
- Regular checks shall be carried out on the technical condition of the vehicles/machinery used in the works, and they shall be properly maintained, in order to eliminate the possibility of leakage of polluting substances.
- Refuelling and maintenance of machinery/vehicles shall be carried out outside the construction site, in specially designated areas provided by authorised operators.
- Wastewater from the eco-toilets to be provided at the construction site shall be emptied and collected only by authorised operators.
- Work involving the crossing of watercourses shall be carried out during periods of low water, with constant monitoring of flow forecasts for each watercourse crossed, without endangering the operation of adjacent premises.
- The construction of launch and reception pits for the horizontal directional drilling works shall be carried out without affecting the banks of the watercourses crossed through excavation.
- For the watercourse crossing section, the condition that the upper end of the protective casing must be situated below the minimum frost depth shall be observed.
- The preparation and implementation, during the construction period, of an Accidental Pollution Prevention and Control Plan, which shall include: the identification of areas with pollution potential, types of pollutants, prevention and control measures, designated responsible persons and necessary resources.
- Avoid parking machinery not involved in the actual works on the embankment area.

During **the project's operational phase**, no measures to reduce or avoid impact are required

During **the decommissioning phase**, the same measures as during the construction phase will be observed. During the execution of the works, all measures established by the Water Management Notice issued by ABA Dobrogea Litoral will be observed.

AIR

During **the construction phase**, the required protective measures fall into the category of preventive measures, achievable through monitoring the operation of the facilities within the designed limits; in the event of a fault, rapid detection is required, followed by prompt rectification.

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To minimise the impact on air quality, the following measures are recommended:

- The use of equipment and machinery in good working order, which complies with the pollution standards imposed by current legislation;
- Regularly check machinery and vehicles for carbon monoxide and other exhaust emissions, and only put them into operation after any faults have been rectified;
- Daily cleaning of access routes to construction sites and work areas (removal of soil and sand) to prevent dust formation;
- Spraying of ground surfaces to be excavated during periods of dry and windy weather;
- Reducing the discharge height of materials generating particulate emissions into the atmosphere;
- Ensuring the optimisation of transport routes for resources required for project implementation, avoiding residential areas as far as possible – development and implementation of a Traffic Management Plan;
- Reducing the speed of heavy goods vehicles on public roads;
- Engines of machinery will be switched off during long periods of idling, and vehicle engines will be switched off during the time taken to load/unload materials.

During the decommissioning phase, conditions similar to those in the construction phase will be provided for.

No preventive measures are required **during the operational phase**, as the Cerchezu wind farm does not constitute a source of air pollution.

Measures to mitigate the effects of climate change

Mitigation measures during the implementation phase

- promoting materials and construction solutions suitable for the potential effects of climate change;
- ensuring a transport system with a high capacity for adaptation;
- creating opportunities to choose environmentally friendly modes of transport;
- identifying alternative transport routes;
- improving road infrastructure and traffic flow to reduce fuel consumption and, consequently, greenhouse gas emissions.

Mitigation measures for the operational phase

- promoting construction materials and solutions suitable for the potential effects of climate change;
- ensuring a transport system with a high capacity for adaptation;
- creating opportunities to choose environmentally friendly modes of transport;
- identifying alternative transport routes;
- improving road infrastructure and traffic flow to reduce fuel consumption and, consequently, greenhouse gas emissions.

SOIL AND SUB-SOIL

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During the construction/decommissioning phase, no additional measures are required to avoid or reduce the impact on the soil/subsoil environment, given the temporary, local and reversible nature of the works.

For this project, a series of best practice requirements for the protection of the 'soil/subsoil' environmental factor will be adopted **during the construction/decommissioning and operational phases.**

During the construction phase:

Only technically inspected vehicles and machinery in good working order will be used; no fuel will be stored on the project site. The temporary storage of materials used and waste generated will not take place directly on the ground, but in areas specifically designated for this purpose.

Implementation of a site-specific Plan for the Prevention and Control of Accidental Pollution; in the event of accidental pollution, action shall be taken in accordance with the procedures set out therein, and the site shall be equipped with means to combat accidental pollution (absorbent materials).

Appropriate management of waste generated during the project's execution period shall be ensured through separate collection in suitable containers, temporary storage solely within the park site in specially designated areas, without direct storage on the ground, followed by recovery/disposal as appropriate, through authorised partners, by handing them over on the basis of contracts concluded for this purpose.

During the operational phase:

The waste generated during the operational period will be minimal, arising solely from maintenance and repair activities; however, appropriate waste management will be ensured through separate collection in suitable containers, with temporary storage taking place only in designated areas, and subsequently recycled or disposed of, as appropriate, by authorised operators, through contracts entered into for this purpose.

During the decommissioning phase: The same measures as during the construction phase will be implemented.

BIODIVERSITY

ROSCI0071/ROSAC0071 Dumbrăveni - Urluia Valley - Vederoasa Lake

A. Habitat loss

The proposed area does not overlap with the site, and no interventions within the site are required for the construction of the project. There is no risk of losing areas of habitats favourable to species of Community interest within the site, but potential habitats of species present within the study area and also designated at the site level may be affected.

B. Habitat alteration

The proposed area does not overlap with the site, and no interventions within the site are required for the construction of the project. There is no risk of losing areas of habitats favourable to species of Community interest within the site, but potential habitats of species present within the project study area and also designated at the site level may be affected.

C. Fragmentation of specific habitats

The project is not likely to cause habitat fragmentation or disrupt connectivity for the species characteristic of this site.

D. Disturbance of wildlife

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Both during the construction and operational phases, there is a risk that the project may lead to the disturbance of species activity due to a reduction in food resources, noise and vibrations, or atmospheric emissions, particularly for the species *Spermophilus citellus* and *Miniopterus schreibersii*.

E. Reduction in population numbers

There is a possibility that the project may result in casualties during both the construction and operational phases. During the construction phase, potential casualties include individuals of the species *Spermophilus citellus*, and during the operational phase, individuals of the species *Miniopterus schreibersii*.

ROSCI0157/ROSAC157 Hagieni Forest – Cotul Văii

A. Habitat loss

The proposed area does not overlap with the site, and no interventions within the site are required for the construction of the project. There is no risk of losing areas of habitats favourable to species of Community interest within the site, but potential habitats of species present within the study area and also designated at the site level may be affected.

B. Habitat alteration

The proposed area does not overlap with the site, and no interventions within the site are required for the construction of the project. There is no risk of losing areas of habitats favourable to species of Community interest within the site, but potential habitats of species present within the study area and also designated at the site level may be affected.

C. Fragmentation of specific habitats

The project is not likely to cause habitat fragmentation or disrupt connectivity for the species characteristic of this site.

D. Disturbance of wildlife

Both during the construction and operational phases, there is a risk that the project may lead to disturbance of species activity due to a reduction in food resources, noise and vibrations, or atmospheric emissions, particularly for the species *Spermophilus citellus*, *Miniopterus schreibersii* and *Rhinolophus ferrumequinum*.

E. Reduction in population numbers

There is a possibility that the project may result in casualties during both the construction and operational phases. During the construction phase, potential casualties include individuals of the species *Spermophilus citellus*, and during the operational phase, individuals of the species *Miniopterus schreibersii* and *Rhinolophus ferrumequinum*.

ROSPA0166 Plopeni – Chirnogeni

A. Habitat loss

The proposed area does not overlap with the site, and no interventions within the site are required for the construction of the project. There is no risk of losing areas of habitats favourable to species of Community interest within the site, but potential habitats of species present within the study area and also designated at site level may be affected.

B. Habitat alteration

The proposed area does not overlap with the site, and no interventions within the site are required for the construction of the project. There is no risk of losing areas of habitats favourable to species of

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Community interest within the site, but potential habitats of species present within the study area and also designated at the site level may be affected.

C. Fragmentation of specific habitats

The project is not likely to cause habitat fragmentation or disrupt connectivity for the species characteristic of this site.

D. Disturbance of wildlife

Both during the construction and operational phases, there is a risk that the project may lead to the disturbance of species due to a reduction in food resources, noise and vibrations, or atmospheric emissions, particularly for the species *Buteo rufinus*, *Circus cyaneus*, *Falco columbarius*, *Falco vespertinus* and *Lanius minor*.

E. Reduction in population numbers

There is a possibility that the project may cause casualties during the operational phase. During the operational phase, potential casualties include the species *Buteo rufinus*, *Circus cyaneus*, *Falco columbarius*, *Falco vespertinus* and *Lanius minor*.

ROSPA0036 Dumbrăveni

A. Habitat loss

The proposed area does not overlap with the site, and no interventions within the site are required for the construction of the project. There is no risk of losing areas of habitats favourable to species of Community interest within the site, but potential habitats of species present within the study area and also designated at the site level may be affected.

B. Habitat alteration

The proposed area does not overlap with the site, and no interventions within the site are required for the construction of the project. There is no risk of losing areas of habitats favourable to species of Community interest within the site, but potential habitats of species present within the study area and also designated at the site level may be affected.

C. Fragmentation of specific habitats

The project is not likely to cause habitat fragmentation or disrupt connectivity for the species characteristic of this site.

D. Disturbance of wildlife

Both during the construction and operational phases, there is a risk that the project may lead to the disturbance of species due to a reduction in food resources, noise and vibrations, or atmospheric emissions, particularly for the species *Buteo rufinus*, *Circus cyaneus*, *Circus pygargus*, *Falco tinnunculus*, *Falco subbuteo* and *Jynx torquilla*.

E. Reduction in population numbers

There is a possibility that the project may cause casualties during the operational phase. During the operational phase, potential casualties include the species *Buteo rufinus*, *Circus cyaneus*, *Circus pygargus*, *Falco tinnunculus*, *Falco subbuteo* and *Jynx torquilla*.

ROSPA0094 Hagieni Forest

A. Habitat loss

The proposed area does not overlap with the site, and no interventions within the site are required for the construction of the project. There is no risk of losing areas of habitats favourable to species of

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Community interest within the site, but potential habitats of species present within the project study area and also designated at site level may be affected.

B. Habitat alteration

The proposed area does not overlap with the site, and no interventions within the site are required for the construction of the project. There is no risk of losing areas of habitats favourable to species of Community interest within the site, but potential habitats of species present within the study area and also designated at the site level may be affected.

C. Fragmentation of specific habitats

The project is not likely to cause habitat fragmentation or disrupt connectivity for the species characteristic of this site.

D. Disturbance of wildlife

Both during the construction and operational phases, there is a risk that the project may lead to the disturbance of species due to a reduction in food resources, noise and vibrations, or atmospheric emissions, particularly for the species *Anser albifrons*, *Buteo rufinus*, *Circus cyaneus*, *Circus pygargus*, *Falco cherrug*, *Falco columbarius*, *Falco peregrinus*, *Falco subbuteo*, *Falco tinnunculus*, *Falco vespertinus*, *Hieraaetus pennatus*, *Melanocorypha calandra*, and *Pernis apivorus*.

E. Reduction in population numbers

There is a possibility that the project may result in casualties during the operational phase. During the operational phase, potential casualties include the species *Anser albifrons*, *Buteo rufinus*, *Circus cyaneus*, *Circus pygargus*, *Falco cherrug*, *Falco columbarius*, *Falco peregrinus*, *Falco subbuteo*, *Falco tinnunculus*, *Falco vespertinus*, *Hieraaetus pennatus*, ***Melanocorypha calandra***, ***Pernis apivorus***.

For the project "Wind Farm 48 (46) wind turbines approx. 316.8 MW (303.6 MW), Substations, Connection grids, construction and modernisation of communication and access routes", located within the municipality of Cerchezu, Constanța County, was issued by the National Agency for the Environment and Protected Areas, in its capacity as the relevant authority responsible for the administration of the protected natural areas ROSAC0071 Dumbraveni - Urluia Valley – Vederoasa Lake, ROSPA0166 Plopeni-Chirnogeni, ROSAC0157 Hagieni Cotul – Vaii Forest, ROSPA0094 Hagieni Forest, ROSPA0151 Ciobanita Osmancea, ROSPA0001 Aliman-Adamclisi, Favourable Opinion No. 81/17.12.2025.

BG0000569 Kardam

A. Habitat loss

The proposed area does not overlap with the site, and no interventions within the site are required for the construction of the project. There is no risk of losing areas of habitats favourable to species of Community interest within the site, but potential habitats of species present within the study area and also designated at site level may be affected.

B. Habitat alteration

The proposed area does not overlap with the site, and no interventions within the site are required for the construction of the project. There is no risk of losing areas of habitats favourable to species of Community interest within the site, but potential habitats of species **present within the study area and also designated at the site level** may be affected.

C. Fragmentation of specific habitats

The project is not likely to cause habitat fragmentation or disrupt connectivity for the species characteristic of this site.

D. Disturbance of wildlife

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During the construction period, there is a risk that the project may lead to the disturbance of species due to a reduction in food resources, noise and vibrations, or atmospheric emissions, particularly for *the species Spermophilus citellus, Mesocricetus newtoni, Mustela eversmanii and Vormela peregusna.*

E. Reduction in population numbers

There is a possibility that the project may result in casualties during the construction phase. During the construction phase, potential casualties include the species *Spermophilus citellus, Mesocricetus newtoni, Mustela eversmanii and Vormela peregusna.*

BG0000570 Izvorovo – Kraishte

A. Habitat loss

The proposed area does not overlap with the site, and no interventions within the site are required for the construction of the project. There is no risk of losing areas of habitats favourable to species of Community interest within the site, but potential habitats of species present within the study area and also designated at the site level may be affected.

B. Habitat alteration

The proposed area does not overlap with the site, and no interventions within the site are required for the construction of the project. There is no risk of losing areas of habitats favourable to species of Community interest within the site, but potential habitats of species present within the study area and also designated at the site level may be affected.

C. Fragmentation of specific habitats

The project is not likely to cause habitat fragmentation or disrupt connectivity for the species characteristic of this site.

D. Disturbance of wildlife activity

Both during the construction and operational phases, there is a risk that the project may disrupt the activity of species due to a reduction in food resources, noise and vibrations, or atmospheric emissions, particularly for the species *Spermophilus citellus, Mesocricetus newtoni, Mustela eversmanii, Vormela peregusna, Canis lupus (only if its presence is confirmed), and Rhinolophus mehelyi.*

E. Reduction in population numbers

There is a possibility that the project may result in casualties during both the construction and operational phases. During the construction phase, potential casualties include individuals of the species *Spermophilus citellus, Mesocricetus newtoni, Mustela eversmanii, Vormela peregusna, Canis lupus (only if their presence is confirmed), and during the operational phase, individuals of the species Rhinolophus mehelyi.*

Measures to avoid and reduce impact

The environmental impact assessment was carried out separately for each factor on which the implementation of the investment may have potential effects. The assessment considered the impacts associated with the construction phase, the operational phase, and the decommissioning phase, where relevant, and identified those effects for which avoidance, mitigation and control measures are required.

The consistent application of the proposed measures (technical and operational preconditions) leads to a reduction in the intensity, duration and/or extent of the initially estimated effects, resulting in a decrease in the level of impact assessed in the 'no measures' scenario. Effects that may persist after the full implementation of avoidance and mitigation measures are expressed as residual impact; at the

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documentation stage under review, this can only be estimated, based on operational scenarios, field data and available modelling.

Verifying the effectiveness of the measures and confirming the level of residual impact are essential elements of the project's environmental management and require the implementation of an appropriate monitoring programme, carried out both during construction and post-construction, with intensity and duration tailored to the components analysed (particularly for sensitive biological receptors, such as birds and bats) and with clear mechanisms for adjusting the measures should monitoring results indicate the need for further interventions.

LANDSCAPE

During the construction and decommissioning phases of the project, protective measures must include those falling under the category of preventive measures. To minimise the impact on the landscape, the following measures are recommended.

- Ensuring cleanliness in access areas on site during the project's construction phase.

No measures are required during the **operational** phase

During the **decommissioning** phase, measures similar to those in the construction phase must be implemented.

POPULATION, SOCIAL AND ECONOMIC ENVIRONMENT,

No measures to avoid or reduce impact are required during **the construction period**.

During the construction phase, no additional measures to avoid or reduce impact are required, given the temporary, local and reversible nature of the interventions.

During the operational phase, to mitigate the potential impact on the social and economic environment, including on public health, preventive measures and best practices specific to the operation of wind farms will be applied. The operation of the installations will be carried out in accordance with the manufacturer's technical requirements and the provisions of the legislation in force, so that noise levels, vibrations and other effects associated with operation are kept within permissible limits. Operation and maintenance activities will be organised in such a way as to limit potential discomfort to the population, and the associated traffic will be reduced and utilised predominantly on the existing road infrastructure. The operation of the equipment will be monitored periodically to prevent the occurrence of situations that could cause discomfort or risks to neighbouring communities.

During the decommissioning phase, the same measures will be implemented as during the construction phase.

CULTURAL HERITAGE

During the construction phase, to protect cultural heritage, preventive measures must be applied to avoid or minimise the potential effects of the project's implementation. Thus, should any elements or remains of archaeological significance be identified during the course of the works, activities will be suspended in the relevant area, and the relevant authorities will be informed so that the necessary expert assessments can be carried out and appropriate solutions determined. Any archaeological excavation work will be carried out in accordance with the legislation in force and the requirements of the National Archaeological Commission.

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The operational phase does not require additional measures to avoid or reduce the impact on cultural heritage, as it does not involve any intervention on the ground or on protected elements.

During the decommissioning phase, measures similar to those used during the construction phase will be applied.

NOISE AND VIBRATIONS

For this project, a series of best practice requirements to reduce noise and vibration levels will be adopted during the construction/decommissioning and operational phases; no measures to avoid or reduce impact are necessary.

The best practice requirements adopted for the project during **the construction phase** and the conditions for their implementation are:

- The construction site mobilization shall be located, as a priority, outside inhabited areas and, mandatorily, outside the boundaries of protected areas.
- Noise- and vibration-generating works shall be carried out only during daylight hours.
- Periodic inspection of machinery and transport vehicles, with operation permitted only after any faults have been rectified.
- A Traffic Management Plan shall be drawn up and implemented to ensure that construction machinery traffic in the vicinity of residential areas is kept to a minimum.

During **the decommissioning phase**, conditions similar to those in the construction phase will be provided for.

WASTE

During **the project's construction phase**, the following categories of waste will be generated:

- Construction waste: metal waste (ferrous and non-ferrous), excavated soil, concrete waste, electrical cable waste, wood waste, plastics, ballast waste;
- Packaging waste: paper/cardboard, plastics, packaging containing residues or contaminated with hazardous substances;
- Waste oils resulting from machinery/equipment used in carrying out the works (other engine, transmission and lubricating oils);
- Used tyres;
- Used batteries and accumulators;
- Household waste resulting from the social activities of staff involved in carrying out the works.

Waste will be collected separately on site in suitable containers, with particular attention paid to hazardous waste, which must not be mixed with non-hazardous waste. Temporary storage of waste directly on the ground will be avoided as far as possible.

The layer of topsoil left uncovered during construction works shall be stored in separate piles and shall be reused primarily for the rehabilitation of areas temporarily affected by the works. For surplus excavated soil, locations where it can be transported shall be identified in consultation with local authorities, or attempts shall be made to identify construction sites requiring this type of material; where this is not possible, the soil may be transported to landfill sites that use this material as a cover layer. The remaining construction waste will be handed over to authorised contractors for recovery or disposal. Recyclable waste will be collected separately and delivered for recycling. Waste oil from machinery will be collected in sealed metal containers, depending on the type of waste oil generated, in specially designated areas (not directly on the ground).

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During **the operational phase** of the wind farm, the following categories of waste will be generated:

- Waste oils (hydraulic oils, transmission and lubricating oils, insulating oils – present in various turbine components, as well as in the transformers within the substation, which must be changed or topped up at specific intervals);
- Filter materials (air filters), polishing materials;
- Packaging waste from substances and components used in maintenance operations;
- Household waste generated by staff involved in maintenance work.

This waste will be generated during maintenance and repair work. The majority of household waste will arise from maintenance and repair work, as the electrical substation is designed in such a way that it does not require permanent operational staff.

Staff carrying out operational and maintenance tasks will be responsible for managing the waste resulting from those tasks. They will be required to hand over the waste to authorised operators according to category, so that it can be recovered and/or disposed of. In addition, the companies responsible for the management and maintenance of the wind farm must comply with the environmental protection requirements established by the wind farm operator.

Used oils, the main type of waste generated by maintenance activities, will be collected in sealed metal containers and handed over to authorised operators for recovery.

During **the decommissioning phase**, significant quantities of waste will be produced, including waste from electrical and electronic equipment, as well as equipment from the substation and wind turbine components. Furthermore, there will be substantially more concrete rubble, metal waste and electrical cable waste than there was during the construction phase. This is largely due to the partial decommissioning of the turbine foundations and the removal of underground power lines. The presence of hazardous fluids in the site equipment will require special attention during the decommissioning phase.

An estimated summary of the quantities of waste generated during the construction and operation phases of the project is presented in the following table.

Waste estimated to be generated during the construction and operation phases

Waste type	Estimated quantity (tonnes)	Physical state	Waste code	Management method
Stage of execution				
Mixed municipal waste	41.48	S	20 03 01	Specially designated areas equipped with wheelie bins will be provided. These will be collected periodically by authorised operators and transported to waste disposal sites.
Plastic waste from construction	0.12	S	17 02 03	These will be collected separately in specially designated temporary storage areas within the construction site mobilization and at the work

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Waste type	Estimated quantity (tonnes)	Physical state	Waste code	Management method
				areas. They will be collected periodically by authorised operators and transported for recovery.
Paper and cardboard packaging	0.84	S	15 01 01	These shall be collected separately in specially designated temporary storage areas within the construction site mobilization and at the work areas. They shall be collected periodically by authorised operators and transported for recovery.
Plastic packaging	0.50	S	15 01 02	
Wood waste from construction	0.88	S	17 02 01	
Metal mixtures	259.25	S	17 04 07	
Concrete	32.93	S	17 01 01	
Ballast waste	20.74	S	17 05 08	
Electrical wires	0.027	S	17 04 11	
Excavated material	48.53	S	17 05 04	Stored in the work area and subsequently reused as fill material.
Packaging containing residues / contaminated with hazardous substances	0.77	S	15 01 10*	These will be collected and stored separately for transport to disposal facilities by authorised operators. An exception is made for packaging returned to the manufacturer (e.g. IBCs).
Used oils (engine/transmission/lubricating oils)	1.30	L	13 02 08*	They will be collected in closed, labelled containers and stored in an enclosed area with a concrete floor. They will be handed over to authorised facilities for collection and recovery.
Oil filters	0.15	S	16 01 07*	They will be collected in sealed bags/metal containers, stored in specially designated areas and handed over to authorised operators for disposal.

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Waste type	Estimated quantity (tonnes)	Physical state	Waste code	Management method
Worn tyres	0.77	S	16 01 03	They will be collected on concrete platforms at construction sites and handed over to authorised facilities.
Batteries and accumulators	0.50	S	16 06 05	They will be collected in metal containers and stored in specially designated areas, and handed over to authorised operators for recovery.
Operational phase				
Non-chlorinated mineral hydraulic oils (hydraulic brake system oil)	0.35	L	13 10* 01	These shall be collected in metal containers and stored in specially designated areas, and shall be handed over to authorised operators for disposal.
Non-chlorinated mineral oils for engines, transmissions and lubrication (emergency lubrication system)	n.a.	L	13 05* 02	They will be collected in metal containers and stored in specially designated areas, and will be handed over to authorised operators for disposal.
Synthetic engine, transmission and lubricating oils (transmission system, return system)	2.30	L	13 06* 02	They will be collected in metal containers and stored in specially designated areas, and will be handed over to authorised operators for disposal.
Non-chlorinated mineral heat-insulating and heat-transfer oils	23.00	L	13 07* 03	They will be collected in metal containers and stored in specially designated areas, and will be handed over to authorised operators for disposal.
Packaging waste containing residues / contaminated with hazardous substances	0.19	S	15 10* 01	They will be collected and stored separately for transport to disposal facilities by authorised operators. An exception is made for packaging returned to the manufacturer (e.g. wet IBCs).

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Waste type	Estimated quantity (tonnes)	Physical state	Waste code	Management method
Plastic packaging waste	0.176	S	15 01 02	They will be collected separately in specially designated temporary storage areas within the construction site mobilization and at the work areas. They will be collected periodically by authorised operators and transported for recovery.
Filter materials (air filters)	0.176	S	15 02 03	They shall be collected separately in specially designated temporary storage areas within the construction site mobilization and at the work areas. They shall be collected periodically by authorised operators and transported for recovery.
Filter materials (oil filters, polishing materials)	n.a.	S	15 02 02*	They shall be collected in sealed bags/metal containers and stored in specially designated areas, and shall be handed over to authorised operators for disposal.
Electrical and electronic waste	n.a.	S	16 02 14	They will be collected in metal containers and stored in specially designated areas and handed over to authorised operators.

* *Physical state: Solid-S, Liquid-L, Semi-solid-SS.*

** *In accordance with the List of Wastes set out in European Commission Decision 2014/955/EU and in Annex 2 of Government Decision No. 856/2002 on waste management records and for the approval of the list of wastes, including hazardous wastes, as subsequently amended and supplemented.*

At all stages of the project, contracts will be concluded with authorised companies to ensure the disposal/recovery of all types of waste generated. All waste generated as a result of the project, at all stages thereof, shall be stored temporarily only on specially designated areas, on concrete platforms, under appropriate conditions, so as not to interfere with the conduct of activities on site.

The temporary storage of waste is carried out in accordance with the relevant legislation in force, as follows:

- on concrete platforms, both covered and uncovered;
- specially designated areas;
- in transportable containers, metal drums;
- in enclosed and covered areas.

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At all stages of the project, waste management records shall be maintained in accordance with Government Emergency Ordinance No. 92/2021 on waste management, as subsequently amended and supplemented, Government Decision No. 856/2002 and Act No. 249/2015 on the management of packaging and packaging waste, as subsequently amended and supplemented. All persons involved in both the construction and decommissioning, as well as the operation of the project, will be trained in waste handling and how to sort waste into categories, using the containers specifically provided for each waste category.

In the case of hazardous waste, special management measures shall be taken (by storing it separately only on impermeable surfaces) to prevent contamination of other waste or the soil. Within the construction site, the contractor shall set up platforms specifically designed for the collection and management of all types of waste resulting from the execution of the works, equipped with bins, containers and receptacles specifically intended for the temporary storage of waste. The areas shall be arranged in such a way as to allow authorised contractors to handle the waste safely. Temporary waste storage shall be carried out separately for each type of waste, with each container or receptacle intended for storage labelled with the corresponding waste code, in accordance with Government Decision 856/2002, as subsequently amended and supplemented.

The company shall maintain a waste management plan for waste generated on site, specifying the name of the waste produced, the waste code, the quantity produced, the quantity recovered, the destination of the waste, and the stock remaining at the end of the year. Pollution resulting from waste generation is considered to be insignificant. During both the construction and operational phases, the company will take all necessary measures to ensure that the disposal and recovery of waste are carried out in a controlled manner, without causing environmental pollution; consequently, no direct and significant impact on environmental factors is anticipated, only an indirect impact through the disposal of such waste by specialist firms. In the case of WEEE (Waste Electrical and Electronic Equipment) – electrical and electronic tools, the company is obliged to recycle them in accordance with Government Decision 448/2005 on waste electrical and electronic equipment. WEEE will be collected separately, and its temporary storage will take place in a specially designated, waterproof area, marked appropriately. The collection of hazardous waste (used transmission and hydraulic oil) will be carried out by a specialised/authorised company in accordance with the contract for the exchange/disposal of used oils generated on site

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CLIMATE CHANGE:

Identification of options for adapting to climate change

For climate risks identified as moderate and high, adaptation measures have been proposed, with the primary objective of reducing the project's vulnerability and ensuring long-term operational continuity. These measures have been taken into account since the design stage and are integrated into the project's technical solutions through the selection of equipment suitable for future climatic conditions, the appropriate sizing of infrastructure, and the adoption of design standards resilient to extreme weather events.

At the same time, measures specific to the operational phase – including those relating to monitoring, adaptive maintenance, emergency management and staff training – will be implemented throughout the project's operational life, in accordance with applicable operational procedures and management plans. Through this integrated approach, the project ensures proactive management of climate risks, limiting potential impacts on assets, staff and overall performance, both under current climate conditions and in future climate scenarios.

Climate change mitigation (climate neutrality)

Wind farms themselves are not included among the categories of projects that have an explicit obligation to calculate and report their carbon footprint, in accordance with Romanian national legislation or standard European environmental regulations (e.g. EIA Directive 2011/92/EU, as amended by 2014/52/EU).

Wind farms contribute directly and significantly to climate change mitigation by generating electricity from renewable sources, with very low greenhouse gas (GHG) emissions during the operational phase. Wind energy replaces electricity generation from conventional fossil fuel-based sources, thereby contributing to the reduction of CO₂ emissions and other atmospheric pollutants at the energy system level.

Although there are emissions associated with the wind farm's life cycle, mainly during the turbine manufacturing, transport, construction and decommissioning phases, these emissions are offset within a relatively short period of time (carbon payback), typically estimated at 1–2 years of operation, depending on the project's technical characteristics and the national energy mix. Over the entire lifetime of the project, the net emissions balance is strongly positive, contributing to the decarbonisation of the energy sector.

By generating renewable electricity on a large scale, wind farms support an increase in the share of renewable energy in the national energy mix and reduce dependence on fossil fuel power stations, including those used to meet peak demand. This reduces both direct GHG emissions and indirect emissions associated with the extraction, transport and combustion of fossil fuels.

Emissions avoided as a result of the wind farm's operation refer to the quantity of GHG emissions (expressed in tCO₂e) that are no longer generated because the electricity produced from wind sources replaces high-carbon energy in the energy system. The level of avoided emissions depends on the wind farm's estimated annual output and the emission factor of the electricity being replaced.

Climate change adaptation measures

Climate hazard	Probability	Severity	Risk	Risk level	Associated risk area	Design and construction measures	Operational and maintenance measures
Flooding / Heavy rainfall	2	3	6	low	RA1, RA5	<p>Installation of underground cable protection systems, including conduits and mechanical protection layers, as well as erosion protection solutions, so that the electrical infrastructure is protected against the effects of water, soil scouring and friction caused by surface runoff.</p> <p>Implementation of land stabilisation measures on sloping surfaces, such as terracing, the use of anti-erosion mats, slope reinforcement and the installation of drainage systems, with the aim of reducing the risk of erosion and landslides during periods of heavy rainfall.</p> <p>Implementation of environmentally friendly erosion protection solutions for onshore wind turbine foundations, including vegetation restoration, the use of permeable materials and nature-based solutions, to ensure the long-term stability of the</p>	Monitoring the drainage levels of surfaces within the site

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Climate hazard	Probability	Severity	Risk	Risk level	Associated risk area	Design and construction measures	Operational and maintenance measures
						foundations and their integration into the surrounding environment.	
Fire Vegetation	3	4	12	high	RA1, RA2, RA3, RA6	Use of appropriate insulation materials and solutions for the electricity transmission infrastructure, including cables and equipment rated for extreme weather conditions, in order to limit losses, protect against thermal stresses and increase the system's resilience to temperature variations and severe weather events.	Carrying out regular vegetation management and maintenance works in the vicinity of the turbine sites and along the routes of associated infrastructure, with the aim of reducing the risk of wildfires, ensuring operational access and preventing damage to equipment. Application of the principle of graded protection of installations, by configuring electrical systems so that wind turbines can be selectively and controllably disconnected from the grid, in order to prevent overvoltages and limit risks associated with electrical faults or extreme weather

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Climate hazard	Probability	Severity	Risk	Risk level	Associated risk area	Design and construction measures	Operational and maintenance measures
							events.
Extreme wind (including storm, lightning, hurricane, tornado)	3	3	9	moderate	RA1, RA5, RA2,	<p>The use of wind turbine blades with flexible structural characteristics and increased strength, designed to withstand high wind speeds and extreme dynamic loads, reducing the risk of structural damage and extending the service life of the turbines.</p> <p>The design and construction of robust foundations, adapted to local conditions and extreme climatic stresses, including appropriate sizing for wind loads, freeze-thaw cycles and variations in soil properties, to ensure the long-term stability of the turbines.</p> <p>Implementation of lightning protection systems, dedicated current-carrying routes and appropriately dimensioned earthing systems, in accordance with applicable technical standards, to prevent damage</p>	<p>Taking out appropriate insurance policies to cover the costs associated with damage caused by extreme weather events (strong winds, storms, lightning), thereby helping to reduce financial risk and ensure the operational continuity of the project.</p>

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Climate hazard	Probability	Severity	Risk	Risk level	Associated risk area	Design and construction measures	Operational and maintenance measures
						to turbines, electrical equipment and transmission infrastructure	
Heatwave	5	3	15	high	RA2, RA5 RA1,	Selecting wind turbines certified for operation in hot climates, by choosing models tested and designed to operate efficiently at high ambient temperatures (above 40°C), in order to ensure reliability and maintain operational performance.	<p>Planning operational and maintenance activities outside peak heat periods, scheduling work in the early morning or evening hours to reduce staff exposure to heat stress and improve workplace safety.</p> <p>Implementation of adaptive SCADA systems capable of dynamically adjusting turbine operating parameters (including output power, speed and blade angle) according to thermal conditions and anticipated thermal stress, in order to protect equipment and optimise its service life.</p>

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Climate hazard	Probability	Severity	Risk	Risk level	Associated risk area	Design and construction measures	Operational and maintenance measures
							The creation and maintenance of green areas with vegetation adapted to drought conditions, in the vicinity of the project infrastructure, as a complementary measure to reduce the heat island effect and improve the local microclimate
Temperature variations	4	3	12	high	RA1, RA2	Optimisation of blade geometry and operating parameters (including tip speed ratio) in response to variations in air density associated with high temperatures, to maintain aerodynamic efficiency and energy performance under extreme climatic conditions.	Increasing the frequency of preventive maintenance and cleaning activities, including the removal of dust, particles and atmospheric pollutants from blades and exposed components, to reduce aerodynamic losses, accelerated wear and the risk of failure during periods of drought and high winds.

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Climate hazard	Probability	Severity	Risk	Risk level	Associated risk area	Design and construction measures	Operational and maintenance measures
Drought	4	2	8	Moderate	RA3, RA6, RA1,	Application of strict design criteria for earthing systems, including appropriate sizing of earth electrodes and selection of suitable materials, so as to ensure the safe operation of installations under variable climatic conditions and extreme electrical events.	Regular monitoring of soil earth resistance and implementation of necessary corrective measures (e.g. improving soil conductivity, extending the earth electrode network), should measured values exceed permissible limits. Implementation and maintenance of vegetation cover along the turbine corridors and associated infrastructure, as a measure to reduce excessive soil drying and erosion processes, whilst also contributing to land stability and the landscape integration of the project.

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IV. CONDITIONS TO BE COMPLIED WITH

1. During the implementation of the project:

Technical conditions required by the provisions of specific regulatory acts

- In accordance with Government Emergency Ordinance No. 92/2021, the holder of a building/demolition permit issued by a local or central public administration authority, or by institutions authorised to approve specialised construction works, is required to have a waste management plan for construction and/or demolition activities, where applicable, establishing sorting systems for waste arising from construction and demolition activities, at least for wood, mineral materials – concrete, brick, tiles and ceramics, stone, metal, glass, plastic and plaster – for their on-site recycling/reuse, insofar as this is economically feasible, does not affect the environment or construction safety, as well as to take measures to promote selective demolition to enable the safe disposal and handling of hazardous substances in order to facilitate high-quality reuse and recycling by removing non-recyclable materials.
- Holders on whose names building and/or demolition permits have been issued, and producers and holders of waste oils, must report annually to the Environmental Protection Agency (APM) by 30 April of the year following the reporting year, on compliance with Article 17(7) (7) and the measures adopted pursuant to Article 31(1), in accordance with the provisions of Government Emergency Ordinance No. 92/2021, as subsequently amended and supplemented;
- In accordance with Government Emergency Ordinance No. 92/2021, as amended and supplemented, waste management must be carried out without endangering public health and without harming the environment, in particular:
 - a) without creating risks of contamination to air, water, soil, fauna or flora;
 - b) without causing discomfort due to noise or odours; and
 - c) without adversely affecting the landscape or areas of special interest.
- repair and maintenance work on motor vehicles is prohibited within the construction site; such work shall be carried out in authorised and suitably equipped facilities;
- hygiene standards and recommendations regarding the living environment of the population, approved by Order of the Minister of Health No. 119/2014, shall be observed;
- It is prohibited to cause any form of disturbance to the neighbourhoods surrounding the site under consideration;
- in accordance with the provisions of Act No. 226/2013 approving Government Emergency Ordinance No. 164/2008 amending and supplementing Government Emergency Ordinance No. 195/2005 on environmental protection, Article 15(2)(a), the holder is obliged to notify the relevant environmental protection authority if new elements arise, unknown at the time of the issuance of the regulatory acts, as well as changes to the conditions on which the issuance of the regulatory acts was based, prior to implementing the modification. Until a decision is adopted by the relevant authority, it is prohibited to carry out the project that would result from the changes covered by the notification (in accordance with Article 16(5) of Government Emergency Ordinance No 195/2005 on environmental protection, approved with amendments and additions by Act No 226/2013).

Conditions imposed by the Bulgarian Government:

Conditions set by the Bulgarian Government in letter No. 99-00-268-46-32 of 23 March 2026, in the cross-border procedure:

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1. 'Wind farm 48(46)CE, transformer stations, electricity connection networks, construction and modernisation of communication and access routes' – shall be implemented in compliance with all measures set out in the Environmental Impact Assessment Report, with a view to preventing, reducing and eliminating adverse effects on the environment, the living environment and public health, as a result of the project's implementation;
2. The paint used for the wind turbines (tower and yaw system) must be of the 'absorbent' type, so as not to create conditions for reflections of incident light;
3. Following the implementation of the investment proposal, controlled monitoring of noise levels, non-ionising radiation and light effects at the border with the affected Bulgarian municipalities shall be ensured. The results of the monitoring shall be transmitted to the Republic of Bulgaria."

Conditions to be met during construction site mobilization

- the construction site will be located on a carefully planned area of land, so that the affected land is kept to a minimum, without affecting the surrounding areas;
- the site perimeter shall be fenced off and appropriate signage provided, ensuring an overall pleasing visual appearance; vehicle repair and maintenance work is prohibited within the site; such work shall be carried out at authorised and suitably equipped facilities; Vehicle wheels shall be cleaned on appropriate platforms to prevent soil being carried onto public roads;
- washing of vehicles within the construction site is prohibited;
- it is mandatory that access for machinery, vehicles and any heavy transport be carried out with measures to protect and/or bypass residential areas;
- care shall be taken to ensure short transport distances for the necessary materials, using transport routes that do not affect residential areas through excessive traffic; the transport of powdery materials shall be carried out only using covered vehicles; if residential areas cannot be bypassed, a reduction in speed shall be ensured;
- the necessary utilities shall be provided to ensure the works are carried out in good conditions (drinking water supply, sanitary facilities, including eco-toilets for staff);
- the equipment and machinery to be used shall be in a satisfactory technical condition, confirmed by the relevant authorities in accordance with the relevant legislation, so as to prevent soil or road pollution with oil or fuel;
- construction techniques and technologies that ensure the safety of environmental factors shall be used;
- the materials required for the execution of the proposed works shall be stored in designated, suitably equipped areas to prevent soil/subsoil contamination;
- the risk of dust emissions arising during the execution of the works shall be reduced by continuously spraying the work areas;
- noise protection measures shall be taken in the worksite's working area to comply with SR 10009/2017 – Acoustics – Permissible limits for ambient noise levels, in accordance with Article 16(1) of the Annex to Order No. 119/2014 approving the Public Health and Hygiene Standards concerning the living environment of the population;
- measures shall be taken to reduce dust emissions within the construction site by wetting the work area, in order to comply with STAS 12574/1987 – Air quality in protected areas;
- upon completion of the works, the contractor is obliged to clear the affected areas of all materials and residues, and to restore the soil in areas where it has been affected by excavation

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works, storage of materials, and the positioning of machinery, with a view to returning the land to its original category of use.

- the provisions of Government Emergency Ordinance 57/2007 on the regime of protected natural areas, the conservation of natural habitats, and wild flora and fauna, as subsequently amended and supplemented, shall be complied with;.

1. During operation:

The provisions of the following legislative acts shall be complied with:

- ✓ Government Emergency Ordinance No. 195/2005 on environmental protection, approved by Act No. 265/2006, as subsequently amended and supplemented;
- ✓ STAS 12574/1987 on air quality conditions in protected areas;
- ✓ Act No. 104/2011 on ambient air quality, as subsequently amended and supplemented, and Order No. 462/1993 approving the Technical Conditions for the Protection of the Atmosphere and the Methodological Rules for the Determination of Atmospheric Pollutant Emissions from Stationary Sources;
- ✓ MAPPM Order No. 756/1997 approving the Regulations on the assessment of environmental pollution, as subsequently amended and supplemented;
- ✓ Water Act No. 107/1996, as subsequently amended and supplemented;
- ✓ Government Decision No. 352/2005 amending and supplementing Government Decision No. 188/2002 approving certain rules on the conditions for the discharge of waste water into the aquatic environment;
- ✓ Government Emergency Ordinance No. 92/2021 on waste management, as amended and supplemented;
- ✓ Act No. 249/2015 on the management of packaging and packaging waste and Order No. 794/2012 on the reporting procedure;
- ✓ Government Emergency Ordinance No. 196/2005 – on the Environment Fund, approved by Act No. 105/2006;
- ✓ Government Decision No. 878/2005 – on public access to environmental information, as subsequently amended and supplemented;
- ✓ Government Emergency Ordinance No. 68/2007 on environmental liability with regard to the prevention and remediation of environmental damage, approved by Act No. 19/2008, as subsequently amended and supplemented;
- ✓ SR 10009/2017 – Acoustics. Permissible limits for ambient noise levels;
- ✓ Order of the Minister of Health No. 119/2014 – hygiene standards and recommendations concerning the living environment of the population;
- ✓ The values of the wastewater quality parameters to be discharged into the sewerage network of S.C. RAJA S.A. Constanta shall be in accordance with the provisions of Government Decision 188/2002 approving the Regulations on the conditions for the discharge of wastewater into local sewerage networks, as amended and supplemented by Government Decision 352/2005, NTPA 002.
- ✓ The conditions set out in the water management notice shall be complied with;
- ✓ Government Emergency Ordinance 57/2007 on the regime of protected natural areas, the conservation of natural habitats, and wild flora and fauna, as subsequently amended and supplemented;

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- ✓ Government Decision 323/2010 establishing the system for monitoring the incidental capture and killing of all bird species, as well as strictly protected species listed in Annexes 4A and 4B to Government Emergency Ordinance No. 57/2007 on the regime of protected natural areas, the conservation of natural habitats, wild flora and fauna.
- ✓ Management plan for protected natural areas ROSPA0019 Cheile Dobrogei, ROSCI0215 Cheia Jurassic Reefs, 2.362 Cheia Jurassic Reefs Nature Reserve, 2.356 La Adam Cave Nature Reserve, 2.357 Gura Dobrogei Cave Nature Reserve, B.2 Gura Dobrogei Nature Reserve, H.G 323/2010 on the establishment of a monitoring system for incidental catches and killings of all bird species, as well as strictly protected species listed in Annexes 4A and 4B to Government Emergency Ordinance No. 57/2007 on the regime of protected natural areas, the conservation of natural habitats, wild flora and fauna.
- ✓ The provisions of the Conditional Notice issued by ANANP/ST Constanta No. 22 of 14 May 2024 and the Conditional Notice issued by ARBDD No. 271 of 16 May 2024 shall be complied with.

2. During closure, demolition, decommissioning, environmental restoration and post-closure

a.) the conditions to be met upon closure/demolition/decommissioning;

- ✓ compliance with the provisions of Article 10 of Government Emergency Ordinance No. 195/2005 on environmental protection, as subsequently amended and supplemented, regarding the fulfilment of environmental obligations in the event of procedures for the sale of a majority stake, sale of assets, merger, division, concession or in other situations involving a change of ownership of the business, as well as in the event of dissolution followed by liquidation, liquidation, bankruptcy or cessation of business;
- ✓ for decommissioning, a decommissioning plan shall be drawn up, which shall provide for at least the following:
 - the collection, by category, of waste generated on site from the decommissioning activity and its disposal in accordance with the provisions of Government Emergency Ordinance No. 92/2021, as amended and supplemented;
 - demolition of structures, in accordance with the provisions of the decommissioning plan approved in accordance with the law;
 - compliance with the conditions imposed by the approving authorities in the regulatory documents issued;
 - restoration of the land by returning it to its original condition or to a condition that allows for its subsequent use;

b) conditions for restoring the site to its original condition/rehabilitation with a view to its subsequent use;

Following the completion of decommissioning and the removal of all components of the wind farm, environmental rehabilitation activities shall be carried out, which shall include:

- excavation and removal of the wind farm's components – foundations and underground electrical cable networks, etc., and clearing the site of any remaining construction materials and waste;
- backfilling the excavations with soil of a similar quality to that in the area surrounding the excavations;

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- rehabilitating the land so as to allow the initial activities to be carried out on the rehabilitated land.

All impact mitigation measures from the Environmental Impact Assessment (-) for which DJMCT Opinion No. 8/20.11.2025 was obtained and issued shall be complied with.

V. INFORMATION REGARDING THE CONSULTATION PROCESS WITH AUTHORITIES RESPONSIBLE FOR ENVIRONMENTAL PROTECTION (MEMBERS OF THE TECHNICAL REVIEW COMMITTEES)

The authorities with responsibilities in the field of environmental protection were consulted and expressed their views during the meetings of the Technical Analysis Committee on 26 November 2025, during the scoping stage, and of the Technical Analysis Committee on 25 March 2026 - the stage of analysing the quality of the environmental impact report and the final decision.

VI. INFORMATION REGARDING PUBLIC PARTICIPATION IN THE PROCEDURE:

-The citizens was informed at all stages of the procedure through notices on the APM/DJM website and in local newspapers: submission of the application for environmental consent – 9 May 2025 (Ziua de Constanta newspaper), scoping stage – 28 November 2025 (Cuget Liber newspaper), submission of the Environmental Impact Report and announcement regarding the organisation of the public debate – 14 January 2026 (Cuget Liber newspaper), public announcement regarding the issuance of the environmental permit – 27 March 2026 (Cuget Liber newspaper);

-The Environmental Impact Report was prepared by the environmental assessor: Ramboll South East Europe SRL – drafting team, certification certificate Series RGX No. 333/ 25 November 2025, issued by the Romanian Environmental Association for the preparation of environmental protection studies;

-The interested public was able to express their views during the public consultation meeting held on 13 February 2026;

VII. CONCLUSIONS OF THE CROSS-BORDER CONSULTATIONS

Pursuant to the provisions of Act No. 22 of 22 February 2001, ratifying the Convention on Environmental Impact Assessment in a Transboundary Context, adopted in Espoo on 25 February 1991, as subsequently amended and supplemented, and falling within Annex 1, point 15, by letter from DJM Constanta No. 1275/25.09.2025, a request was made to forward the Notification to the affected party regarding a proposed activity pursuant to Article 3 of the Convention, in Romanian, English and Bulgarian. Correspondence with MMAP – letter from DJM No. 1275/25.09.2025, regarding the need to initiate the transboundary procedure; letter from MMAP No. DGEIPSC4964/04.02.2026, notifying the decision by the Bulgarian Government to participate in the transboundary procedure; letter from DJM Constanta No. 1838/27.11.2025, forwarding the requested documents, namely the Environmental Impact Report and the 'Shadow Flicker Assessment' study; email from the Ministry of the Environment and Water (MM) dated 23 March 2026, forwarding the letter regarding the completion of the cross-border procedure by the Bulgarian Government; MMAP letter No. 13751/27 March 2026, registered with the Constanta Regional Directorate of the Ministry of the Environment and Water (DJM) under No.

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6185/25 March 2026, regarding the completion of the cross-border procedure by the Bulgarian Government;

Conditions set by the Bulgarian Government in letter No. 99-00-268-46-32 of 23 March 2026, in the cross-border procedure:

1. *"Wind Farm 48(46)CE, transformer stations, electrical connection networks, construction and modernisation of communication and access routes" – shall be implemented in compliance with all measures set out in the Environmental Impact Report, with a view to preventing, reducing and eliminating adverse effects on the environment, the living environment and public health, as a result of the project's implementation;*
2. *The paint used for the wind turbines (tower and yaw system) must be of the 'absorbent' type, so as not to create conditions for reflections of incident light;*
3. *Following the implementation of the investment proposal, controlled monitoring of noise levels, non-ionising radiation and light effects at the border with the affected Bulgarian municipalities shall be ensured. The results of the monitoring shall be transmitted to the Republic of Bulgaria."*

VIII. ENVIRONMENTAL MONITORING PLAN, SPECIFYING THE ENVIRONMENTAL COMPONENTS TO BE MONITORED, THE FREQUENCY, THE PARAMETERS AND THE LOCATION CHOSEN FOR MONITORING EACH FACTOR:

During construction, operation and decommissioning:

Environmental factor	Objectives	Indicators	Frequency
AIR	Improvement of ambient air quality; maintenance of air quality standards Reducing the impact of traffic on the project areas (regular checks on machinery and vehicles to ensure they are in good working order and do not generate pollutants above permitted limits)	- particulate matter, settleable dust - noise level (dB)	half-yearly
SOIL - SUB-SOIL	Exploitation of resources at the limit of carrying capacity Ensuring soil quality	- soil quality parameters in accordance with Order 756/1997	at the request of the environmental authority
WASTE MANAGEMENT	Drawing up an environmental management/waste management plan	- assessment of the quantity of waste generated and transported; - status of facilities for waste collection and transport	annually
Protection of human settlements	Maintaining the quality of environmental factors	Carrying out noise measurements at the boundary of the project	at the request of the environmental authority

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		site, in the vicinity of the locality	
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- we note that monitoring during construction must be carried out throughout the entire construction/operation/decommissioning period;
- the annual report, which will include the results of the monitoring of the parameters set out above, will be submitted to the Constanta County Directorate of Youth and Sports;
- taking into account the conditions set by the Bulgarian Government in letter no. 99-00-268-46-32 of 23 March 2026, as part of the cross-border procedure, namely: *'Following the implementation of the investment proposal, controlled monitoring of noise levels, non-ionising radiation and light effects shall be ensured at the border with the affected Bulgarian municipalities. The monitoring results will be forwarded to the Republic of Bulgaria.'* The requested parameters will be monitored throughout the wind farm's operational period, and the monitoring results will be submitted to DJM Constanta for forwarding to the Bulgarian Government, in accordance with the provisions of the applicable legislation.

BIODIVERSITY MONITORING

The monitoring of the impact generated by the construction and operation of the project serves to objectively verify the estimates made prior to implementation (including the level of residual impact), to quantify the effectiveness of the avoidance and mitigation measures already applied, and to identify, where necessary, the need for additional measures or adjustments to existing ones. The monitoring programme is designed to cover both the construction and operational phases (and, where applicable, the decommissioning phase), with a focus on the identified sensitive receptors.

The monitoring results will be integrated into a single database, which will enable the tracking of indicator trends over time, comparison with applicable reference values/limits, and the substantiation of decisions regarding the implementation of additional measures or the expansion/optimisation of monitoring locations and methods, so as to reflect the actual situation at the site and in the area of influence, including in the vicinity of the border.

Irrespective of the monitoring programme, the operator is obliged to report, in accordance with the legislation in force, any case of accidental killing of bird species and strictly protected species, including those listed in the relevant annexes to Government Emergency Ordinance No. 57/2007, as well as any incident with the potential to affect the environment associated with the project's activities.

Within the project documentation, the analysis was structured around each environmental component likely to be affected, taking into account the potential impacts associated with the construction phase, the operational phase and, where applicable, the decommissioning phase, and for the effects identified as relevant, specific avoidance, mitigation and control measures were established, applicable from the first year of the wind farm's operation. The measures applicable to minimize the effects on biodiversity (including technical and operational conditions) are set out in the Environmental Impact Monitoring Programme, which includes components/sub-components, indicators, monitoring locations, minimum durations, minimum campaign frequencies and reporting frequencies.

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The proposed monitoring programme for the project:

Measure	Species/ Habitat affected	Parameter to which it applies measure	Impact is addresse d measure	Timetable for the implementation of the measures												Responsible	Budget	
				1	2	3	4	5	6	7	8	9	10	11	12			
General measures																		
M1	Conduct regular training for all staff involved in construction/decommissioning works on general environmental issues, protected habitats and species, and measures to avoid and reduce impacts. Particular attention shall be paid to aspects relating to the prohibition of collecting plants and animals or the deliberate wounding/killing of protected species.	All bird species* potentially affected and bats** from ROSCI0071, ROSCI0157, ROSPA0166, ROSPA0036, ROSPA0094, BG0000569, BG0000570	Population size Population trends for each species Habitat area	All forms of impact	X	X	X	X	X	X	X	X	X	X	X	X	Builder	No extra costs

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Measure	Species/ Habitat affected	Parameter to which it applies measure	Impact is addresse d measure	Timetable for the implementation of the measures												Responsible	Budget	
				1	2	3	4	5	6	7	8	9	10	11	12			
M2	Installation of low-glare lighting systems with light directed exclusively towards the ground (excluding incandescent bulbs that generate heat)	All bird species* potentially affected and bats** from ROSCI0071, ROSCI0157, ROSPA0166, ROSPA0036, ROSPA0094, BG0000569, BG0000570	Population trends for each species Habitat area	PAS, REP	X	X	X	X	X	X	X	X	X	X	X	X	Builder	No extra costs
M3	Compliance with the proposed work schedule, as well as compliance with the timeframe set out in this project.	All bird species* potentially affected and bats** from ROSCI0071, ROSCI0157, ROSPA0166,	Population trends for each species Habitat area	PAS	X	X	X	X	X	X	X	X	X	X	X	X	Builder	No extra costs

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Measure	Species/ Habitat affected	Parameter to which it applies measure	Impact is addresse d measure	Timetable for the implementation of the measures												Responsible	Budget	
				1	2	3	4	5	6	7	8	9	10	11	12			
	ROSPA0036, ROSPA0094, BG0000569, BG0000570																	
M4	Compliance with the perimeter of the proposed construction site mobilization to be located in the immediate vicinity of the work area.	All bird species* potentially affected, as well as bats** and mammals* from ROSCI0071, ROSCI0157, ROSPA0166, ROSPA0036, ROSPA0094, BG0000569, BG0000570	Population trends for each species Habitat area	PAS	X	X	X	X	X	X	X	X	X	X	X	X	Builder	No extra costs

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Measure	Species/ Habitat affected	Parameter to which it applies measure	Impact is addresse d measure	Timetable for the implementation of the measures												Responsible	Budget	
				1	2	3	4	5	6	7	8	9	10	11	12			
M5	Carrying out activities within the perimeter on the strictly necessary areas.	All bird species* potentially affected, as well as bats** and mammals*** from ROSCI0071, ROSCI0157, ROSPA0166, ROSPA0036, ROSPA0094, BG0000569, BG0000570	Population trends for each species Habitat area	AH, PAS	X	X	X	X	X	X	X	X	X	X	X	X	Builder	No extra costs
M6	Construction materials shall be stored only in the areas designated in the project within the construction site mobilization and work areas, without affecting	All bird species* potentially affected, as well as bats** and mammals***	Population trends for each species Habitat area	AH, PAS	X	X	X	X	X	X	X	X	X	X	X	X	Builder	No extra costs

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Measure	Species/ Habitat affected	Parameter to which it applies measure	Impact is addresse d measure	Timetable for the implementation of the measures												Responsible	Budget	
				1	2	3	4	5	6	7	8	9	10	11	12			
	neighbouring areas.	from ROSCI0071, ROSCI0157, ROSPA0166, ROSPA0036, ROSPA0094, BG0000569, BG0000570																
M7	Prevention of any spills onto the ground of liquid fuels, oils, paints, etc. In the event of accidental spills, these will be removed by applying absorbent materials and cleared from the site by contracting specialist companies for the management of such hazardous waste.	All bird species* potentially affected, as well as bats** and mammals*** from ROSCI0071, ROSCI0157, ROSPA0166, ROSPA0036,	Population trends for each species Habitat area	AH, PAS	X	X	X	X	X	X	X	X	X	X	X	X	Builder	No extra costs

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Measure	Species/ Habitat affected	Parameter to which it applies measure	Impact is addresse d measure	Timetable for the implementation of the measures												Responsible	Budget	
				1	2	3	4	5	6	7	8	9	10	11	12			
	ROSPA0094, BG0000569, BG0000570																	
M8	Ensuring proper waste management with regular disposal without the use of intermediate or non-compliant storage sites. It is prohibited to abandon waste in the immediate vicinity of the construction site and beyond.	All bird species* potentially affected, as well as bats** and mammals*** from ROSCI0071, ROSCI0157, ROSPA0166, ROSPA0036, ROSPA0094, BG0000569, BG0000570	Population trends for each species Habitat area	AH, PAS	X	X	X	X	X	X	X	X	X	X	X	X	Builder	No extra costs

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Measure	Species/ Habitat affected	Parameter to which it applies measure	Impact is addresse d measure	Timetable for the implementation of the measures												Responsible	Budget	
				1	2	3	4	5	6	7	8	9	10	11	12			
M9	Access to the work sites will be via existing access routes so as not to affect additional areas of land.	All bird species* potentially affected, as well as bats** and mammals*** from ROSCI0071, ROSCI0157, ROSPA0166, ROSPA0036, ROSPA0094, BG0000569, BG0000570	Population trends for each species Habitat area	AH, PAS	X	X	X	X	X	X	X	X	X	X	X	X	Builder	No additional costs
M10	Use of machinery and equipment for carrying out the works that produce a minimum level of noise and vibration, are high-performance, low-polluting and quiet, so that wildlife is not	All bird species* potentially affected, as well as bats** and mammals***	Population trends for each species Habitat area	PAS	X	X	X	X	X	X	X	X	X	X	X	X	Builder	No extra costs

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Measure	Species/ Habitat affected	Parameter to which it applies measure	Impact is addresse d measure	Timetable for the implementation of the measures												Responsible	Budget	
				1	2	3	4	5	6	7	8	9	10	11	12			
	affected.	from ROSCI0071, ROSCI0157, ROSPA0166, ROSPA0036, ROSPA0094, BG0000569, BG0000570																
M11	Topsoil or fertile soil resulting from excavations will be properly stored and protected, then reused. Restoration of the topsoil layer in temporarily occupied areas.	potentially affected, as well as bats** and mammals*** in ROSCI0071, ROSCI0157, ROSPA0166, ROSPA0036, ROSPA0094,	Population trends for each Habitat area	AH, PAS	X	X	X	X	X	X	X	X	X	X	X	X	Builder	No additional costs

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Measure	Species/ Habitat affected	Parameter to which it applies measure	Impact is addresse d measure	Timetable for the implementation of the measures												Responsible	Budget
				1	2	3	4	5	6	7	8	9	10	11	12		
	BG0000569, BG0000570																
Specific dimensions																	
M12	Construction and installation works must be planned so that they take place outside the breeding and rearing seasons of species of Community interest, regardless of the presence or absence of nests on site. The planning of activities must take into account the biological calendar of the species concerned, so as to prevent any negative impact on them.	All components Natura 2000 sites associated with the protected natural areas ROSCI0071, ROSCI0157, ROSPA0166, ROSPA0036, ROSPA0094, BG0000569,	Population size Population trends for each species	REP	X	X	X	X	X	X	X	X	X	X	X	X	No extra costs

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Measure	Species/ Habitat affected	Parameter to which it applies measure	Impact is addresse d measure	Timetable for the implementation of the measures												Responsible	Budget	
				1	2	3	4	5	6	7	8	9	10	11	12			
		BG0000570																
M13	Turbines must be marked at night with flashing lights, with long intervals between two consecutive flashes. These turbines are more easily recognised by birds when flashing lights are used instead of continuous ones.	potentially affected and bats** from ROSCI0071, ROSCI0157, ROSPA0166, ROSPA0036, ROSPA0094, BG0000569, BG0000570	Population size Population trends for each species	REP	X	X	X	X	X	X	X	X	X	X	X	X	Builder	No extra costs
M14	Regular mowing of vegetation around the turbines to keep the amount of insect species low, as these serve as a food source for both bat species	All bird species* potentially affected and bats** in	Population size Population trends for each species	REP				X	X	X	X	X	X	X			Builder	€10,000 per year

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Measure	Species/ Habitat affected	Parameter to which it applies measure	Impact is addresse d measure	Timetable for the implementation of the measures												Responsible	Budget	
				1	2	3	4	5	6	7	8	9	10	11	12			
	and bird species.	ROSCI0071, ROSCI0157, ROSPA0166, ROSPA0036, ROSPA0094, BG0000569, BG0000570																
137 51/ 27. 03. 202 6M1 5	Installation of a conditional activation lighting system (Aircraft Detection Lighting System – ADLS) for the T47, T46, T35, T36 and T34 turbines to reduce the risk of mortality among species sensitive to artificial light (birds and bats). The measure will be implemented from the first year of the project's	potentially affected and bats** in ROSCI0071, ROSCI0157, ROSPA0166, ROSPA0036, ROSPA0094, BG0000569, BG0000570	Population size Population trends for each species REP	X	X	X	X	X	X	X	X	X	X	X	X	X	Contractors/Certified and experienced experts in biodiversity monitoring	Approximately €100,000

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Measure	Species/ Habitat affected	Parameter to which it applies measure	Impact is addresse d measure	Timetable for the implementation of the measures												Responsible	Budget	
				1	2	3	4	5	6	7	8	9	10	11	12			
operation																		
M16	To reduce the risk of mortality, the following are proposed: limiting the entry into operation of the turbines (T47, T46, T35, T36, T34) to a wind speed of 6.5 m/s, during the sensitive period (migration), from half an hour before sunset until sunrise, and bat protection systems emitting ultrasonic deterrent signals to	All bird species* potentially affected and bats** from ROSCI0071, ROSCI0157, ROSPA0166, ROSPA0036, ROSPA0094, BG0000569, BG0000570	Population size Population trends for each species	REP	X	X	X	X	X	X	X	X	X	X	X	X	Park owner/Certified and experienced experts in biodiversity monitoring	No additional costs

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Measure	Species/ Habitat affected	Parameter to which it applies measure	Impact is addresse d measure	Timetable for the implementation of the measures												Responsible	Budget	
				1	2	3	4	5	6	7	8	9	10	11	12			
	drive bats away from the rotation area. The measure will be implemented from the first year of the wind farm's operation.																	
M17	The installation of collision risk prevention systems will be implemented from the first year of the wind farm's operation. An automatic system for shutting down or reducing the operating speed of turbines (e.g. DTBird, IdentiFlight, Robin Radar Max, STRIX BirdTrack). The system will target bird species for which a significant potential impact has been identified and will be applied from the first year of operation.	All bird species* potentially affected and from ROSPA0166, ROSPA0036, ROSPA0094	Population size Population trends for each species REP			X	X	X					X	X	X		Park owner / Certified and experienced experts in biodiversity monitoring	Approxim ately €150,000

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Measure	Species/ Habitat affected	Parameter to which it applies measure	Impact is addresse d measure	Timetable for the implementation of the measures												Responsible	Budget	
				1	2	3	4	5	6	7	8	9	10	11	12			
M18	<p>Installation of a video monitoring system for bird detection on turbines T8, T18, T29, T32 and T37. High-resolution camera systems will be installed. The bird deterrent system must be installed from the first year of the wind farm's operation.</p> <p>The video monitoring system detects birds from a distance of up to 600 m and emits deterrent sounds. If the bird continues to approach the turbine, after 300 metres the blades begin to slow down to a speed of 3 rpm, which eliminates the risk of collision</p>	<p>All bird species* potentially affected in</p> <p>ROSPA0166, ROSPA0036, ROSPA0094</p>	<p>Population size Population trends for each species</p>	REP	X	X	X	X	X	X	X	X	X	X	X	X	<p>Park owner / Certified and experienced experts in biodiversity monitoring</p>	<p>Approxim ately €200,000</p>

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Measure	Species/ Habitat affected	Parameter to which it applies measure	Impact is addresse d measure	Timetable for the implementation of the measures												Responsible	Budget	
				1	2	3	4	5	6	7	8	9	10	11	12			
M19	<p>The installation of radar systems and day and night-vision cameras (on the T8, T18, T29, T32 and T37 turbines) to detect and prevent the risk of bats colliding with the wind farm's structures.</p> <p>The collision avoidance signalling system must be installed from the first year of the wind farm's operation.</p>	<p>All bat species* potentially affected in</p> <p>ROSCI0071, ROSCI0157, BG0000569, BG0000570</p>	<p>Population size Population trends for each species</p> <p>REP</p>					X	X	X	X	X	X	X			<p>Park owner / Certified and experienced experts in biodiversity monitoring</p>	<p>Approxim ately €200,000</p>

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The documentation on which the environmental consent was based includes:

- The notification registered with the Constanta Environmental Protection Agency (APM) under no. 282RP/21.01.2025, and its annexes: proof of payment of the fee, Stereo 70 coordinates, land lease agreements, Zoning Plan, Site Plan;
- Decision of the initial assessment stage No. 54/07.02.2025;
- Presentation registered with the Constanta Environmental Protection Agency (APM) under no. 1535/15.05.2025, with subsequent additions;
- Guidance on environmental issues sent by DJM Constanta via letter No. 1932/09.12.2025 to the project owner;
- Screening Stage Decision No. 477/24.12.2025 issued by DJM Constanta;
- The Environmental Impact Report;
- The views expressed by CAT members during the procedure;
- Letter from the Ministry of Environment and Water of the Republic of Bulgaria No. 99.00.268-40/17.09.2025, setting out the mandatory conditions, following the completion of the cross-border impact assessment procedure, which must be included in the Environmental Notice for the PUZ phase;
- Shadow Flicker Assessment, carried out following a request from the Bulgarian side to assess the impact of physical factors in a cross-border context, in particular light effects;
- Favourable opinion No. 81/17.12.2025 issued by the National Agency for the Environment and Protected Areas, in its capacity as the relevant authority responsible for the management of the protected natural areas ROSAC0071 Dumbraveni - Urluia Valley – Vederoasa Lake, ROSPA0166 Plopeni-Chirnogeni, ROSAC0157 Hagieni Cotul – Vaii Forest, ROSPA0094 Hagieni Forest, ROSPA0151 Ciobanita Osmancea, ROSPA0001 Aliman-Adamclisi for the project "Wind energy park comprising 48 (46) wind turbines approx. 316.8 MW (303.6 MW), transformer stations, electricity connection networks, construction and modernisation of communication and access routes", located within the municipality of Cerchezu, Constanța County;
 - o the provisions of the Management Plan and Regulations for the protected natural areas ROSCI0071 Dumbrăveni - Urluia Valley - Vederoasa Lake, ROSPA0036 Dumbrăveni, ROSPA0001 Aliman - Adamclisi, ROSPA0007 Vederoasa Pond, 2.361 Dumbrăveni Forest, 2.350 Limestone Cliffs at Petroșani - Deleni Commune, 2.351 Aliman Fossil Site and IV.30 Vederoasa Lake, approved by Order of the Minister of the Environment, Water and Forests No. 1557/2016.
 - o the provisions of the Management Plan and Regulations for the protected natural areas RSOCI0157 Hagieni Forest - Cotul Văii, ROSPA0094 Hagieni Forest and 2.360 Hagieni Forest, approved by Order of the Minister of the Environment, Water and Forests No. 1480/2016.
 - o - The provisions of the Management Plan and Regulations for the protected natural areas ROSCI0157 Hagieni-Cotul Văii Forest, ROSPA0094 Hagieni Forest and 2.360 Hagieni Forest ROSCI0157/ROSAC157 Hagieni Forest approved by Order No. 1480/2016 on the approval of the Management Plan
 - o - ROSPA0166 Plopeni-Chirnogeni - Note No. 8914/BT/ 28 March 2022
 - o Provisions of the Management Plan and the Regulations for Protected Natural Areas ROSCI0157 Hagieni Forest-Cotul Văii, ROSPA0094 Hagieni Forest and 2.360 Hagieni Forest ROSPA0094 Hagieni Forest approved by Order No. 1480/2016 on the approval of the Management Plan

Approvals and documents issued by other authorities:

- Planning Certificate No. 129/28.11.2022, with extended validity;

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- Health and Public Comfort Impact Assessment Study No. 111/06.03.2024, prepared by SC Vest Medical Impact SRL Timisoara;
- Notification – specialist public health assistance No. IMA 13375R/25.03.2024, issued by the Constanta County Public Health Directorate;
- Water Management Notice No. 20/2026 issued by the Dobrogea Litoral Basin Administration;
- Approval issued by the Constanta County Directorate of Culture No. 1226/09.12.2025
- Approval issued by E-distributie Dobrogea No. 26112448/27.02.2025
- Approval issued by the Forest District No. 1822/05.09.2023
- Forest Guard No. 8494/29.09.2023
- Approval issued by IRIDEX Salubritate No. 2005/28 March 2025
- Approval issued by the Ministry of National Defence – Defence Staff No. DT/15518/18 December 2025
- Approval issued by Digi Romania No. 3037621255/11 August 2025
- Approval issued by the SRI No. N743788/26 November 2025
- Approval issued by the Special Telecommunications Service (STS) No. 18989/18 August 2023
- Telekom Orange Communication/Orange Romania No. AFO741720/25 April 2024
- Approval issued by CNTEE Transelectrica SA Constanta Branch No. 11454/14 September 2023
- Approval issued by the Romanian Civil Aviation Authority No. 22055/18 August 2025
- Approval issued by MADR – Constanta County Directorate for Agriculture (removal from agricultural use) No. 15528/25.11.2025 and No. 17046/27.11.2025"
- Approval issued by the National Agency for Land Improvement – Dobrogea Regional Branch No. A266/25.11.2025.

Upon completion of the works, the holder is obliged to:

Notify DJM Constanta for the purpose of verifying compliance with all conditions imposed by the environmental agreement, in accordance with the provisions of Annex V - Procedure for the environmental impact assessment of certain public and private projects, Article 43(3) and (4) of Act No. 292/2018 on the environmental impact assessment of certain public and private projects;

This environmental agreement shall remain valid for the entire duration of the project; should new circumstances arise that were unknown at the time of the agreement's issuance, or should the conditions on which its issuance was based change, the project owner shall be obliged to notify the relevant issuing authority.

Failure to comply with the provisions of this agreement shall result in its suspension and cancellation, as appropriate.

This agreement may be challenged in accordance with the provisions of Act No. 292/2018 on the environmental impact assessment of certain public and private projects and of the Administrative Litigation Act No. 554/2004, as subsequently amended and supplemented.

**Director,
 Celzin LATIF**

Surname and First Name	Position	Date	Signature
Approved by: Lavinia-Monica ZECA	Head of Regulatory Services	08.04.2026	
Drafted by: Simona SIMA	Advisor	08.04.2026	

This agreement comprises 89 pages and is issued in 3 copies.

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Subsemnata, XENOFONT MAGDA, interpret și traducător autorizat pentru limba străină Engleză, în temeiul autorizației nr. 4151/2000, eliberată de Ministrul Justiției din România, certific exactitatea traducerii efectuate din limba română în limba engleză, că textul prezentat a fost tradus complet, fără omisiuni, și că, prin traducere, înscrisului nu i-a fost denaturat conținutul și sensul.

I, the undersigned XENOFONT MAGDA, authorized interpreter and translator for English language, according to Authorization no. 4151/2000, delivered by the Ministry of Justice of Romania, hereby certify the exactness of the translation from Romanian language into English language, that the text presented to me was entirely translated, without omissions, and that, by means of translation, the document did not incur any modification in terms of content and sense.

Interpret și traducător autorizat
Authorized interpreter and translator,



✓