

Date: 29 February 2024
Our ref: DCO Material Change Pre-application Consultation



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BY EMAIL ONLY

Dear

Hinkley Point C Development Consent Order: Material Change Pre-application Consultation

Thank you for seeking our advice on the above Material Change Pre-application Consultation dated 09 February 2024. We understand that NNB Generation Company (HPC) Limited ('the Company') is intending to submit an application for a material change to the approved Development Consent Order (DCO) for the Hinkley Point C nuclear power station, which is currently under construction. The proposed material change application consists of six on-site changes to elements of the power station design; together with a number of off-site measures to compensate for the removal of an Acoustic Fish Deterrent (AFD).

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Since September 2022 we have engaged with the Company, in partnership with Natural Resources Wales and the Environment Agency, to provide pre-application advice on the provision of compensatory measures to meet the requirements of Regulation 68 of the Conservation of Habitats and Species Regulations 2017 (as amended) ('the Habitats Regulations'). This advice remains relevant and includes guidance on the principles of compensatory measure provision provided in March 2023 (Annex C); and advice on the Company's draft Compensation Package Proposal provided in June 2023 (Annex D). We have welcomed this opportunity for early engagement but note that agreement is still to be reached on a number of key principles underpinning the Company's proposed approach, including agreeing a Statement of Assessed Harm and Pathway to Mutual Understanding document. Therefore, the advice within this letter is provided without prejudice to this agreement; or any subsequent advice provided by Natural England relating to the DCO material change application.

The following documents have been provided by the Company as part of the Pre-application Consultation:

- Consultation Overview Document;
- Preliminary Environmental Information Report (PEIR): draft substantive chapters and

appendices;

- Shadow Habitats Regulations Assessments (HRA): Evidence Report and appendices.

Natural England has reviewed these documents and provided our headline comments and a corresponding summary of key comments and recommendations below. Please refer to the following Annexes for further detailed advice:

- Annex A – Natural England’s high-level technical comments on substantive PEIR chapters, Shadow HRA Evidence Report and accompanying appendices.
- Annex B – Summary of Natural England’s pre-application engagement with the Company to date.
- Annex C – Copy of advice provided by Natural England, Natural Resources Wales and the Environment Agency on the principles of compensatory measure provision under the Conservation of Species and Habitats Regulations 2017 (as amended) for the Hinkley Point C nuclear power station (March 2023).
- Annex D – Copy of advice provided by Natural England on draft HPC Compensation Package Proposal (June 2023).

Natural England’s headline comments

1. The draft PEIR chapters and Shadow Habitats Regulations Assessment (HRA) are currently lacking sufficient detail and quantitative assessment to support many of the statements being made.
2. On the basis of the information provided in the PEIR, we do not object to the proposed changes to structures associated with the Hinkley Point C terrestrial construction site: (1) the redesign of the Interim Spent Fuel Store to facilitate dry storage of spent fuel and the replacement of the associated Access Control Building with an Equipment Storage Building; (2) the redesign and relocation of the Meteorological Mast; (3) the retention of the Hinkley Point Substation as a permanent feature; and (4) the construction of four new structures to house sluice gates and lifting beams.
3. There remains uncertainty around the predicted impacts of HPC upon Annex II migratory fish and the assemblage of fish species, together with a lack of clarity on the approach to assessment. There is a need to consider new evidence that suggests the risk to protected species (e.g. shad) is higher than predicted and counter to key assumptions made in the impact assessment.
4. It is Natural England’s view that the creation of saltmarsh, seagrass, kelp forests and native oyster reef to increase fish productivity is appropriate in principle, but the proposed scale of these measures is currently insufficient to offset predicted impacts. Further work is also required to provide sufficient confidence that these measures can be secured and delivered successfully.
5. We welcome the proposal to develop a robust Adaptive Monitoring and Management Plan (AMMP) but note that further work is required to identify and agree appropriate indicators, targets and success criteria.

Summary of key comments and recommendations

1. General approach: PEIR and Shadow Habitats Regulations Assessment (HRA)

- 1.1.1 Natural England welcomes the opportunity to review and provide comment on the draft PEIR

chapters and shadow HRA. However, we have concerns around the information provided in these documents – particularly with respect to the proposed package of compensatory measures. The quality and content of the documents, particularly the shadow HRA, is lacking sufficient detail, quantitative assessment and evidence to support the statements being made. Consequently, we have been unable to provide an informed view on the sufficiency of these measures in offsetting the predicted impacts of HPC; and protecting the overall coherence of the National Site Network as required under Regulation 68 of the Habitats Regulations. We expect these deficiencies to be addressed before formal submission of the documents as part of the DCO material change application.

2. Screening and assessment: Terrestrial ecology

2.1 Overview of The Baseline Environment

- 2.1.1 Predictions of changes that may occur in the future are vague and speculative and consideration of this period does not add value to the analysis. Although there is little temporal difference between the current and the future baseline, as defined, the predictions of possible changes in the future tend towards considering possible long-term shifts, i.e. beyond the date when HPC becomes operational from 2029 to 2031 (according to information released by the Company in January 2024).
- 2.1.2 Information presented on the current baseline for marine mammals is generalised and does not include any records of mammals observed in the vicinity of the HPC marine infrastructure sites, or in the River Parrett and its estuary since the 2013 DCO HRA.
- 2.1.3 For marine ornithology, it would be helpful if for all relevant species the likelihood of being present in the vicinity of HPC marine infrastructure could be presented clearly.
- 2.1.4 For terrestrial and freshwater ecology, the current baseline does not mention any of the changes observed or habitats created or enhanced since 2013. EDF's annual ecological monitoring reports are not mentioned.

2.2 HRA Stage 1: Screening

- 2.2.1 Relevant European/Ramsar sites: The approach taken to screening for a Likely Significant Effect (LSE) includes many sites where there cannot be a pathway between a project to a qualifying feature. This includes sites notified for bat species, otter, habitats, bird species and assemblages. Some for example involve “habitat SACs”, such as the Dorset Heaths and the Peak District Dales, where there can be no possibility of a pathway between the proposed projects and receptors. Others involve SACs where some sites where qualifying features may be affected when their ranges coincide with impacts caused by the proposed projects, but other sites more distant will not be, for example “otter” SACs. Some seabird sites can be filtered out by assessing the maximum foraging range of species in relation to distance from HPC marine infrastructure.
- 2.2.2 Conservation Objectives: Natural England's new high level conservation objectives have been selected incorrectly for the Severn Estuary SAC and SPA. Both Natural England and Natural Resources Wales continue to use the Regulation 33 (now 37) advice package¹ as Supplementary Advice on the European Site Conservation Objectives for the Severn Estuary

¹ Natural England and the Countryside Council for Wales (CCW) (2009). The Severn Estuary Special Protection Area European Marine Site English Nature & the Countryside Council for Wales" advice for the Severn Estuary Special Protection Area given under Regulation 33(2) of the Conservation (Natural Habitats &c.) Regulations 1994). Please note that the 1994 Regulations have been superseded by the Conservation of Habitats and Species Regulations 2017 and the Regulation 33 has become Regulation 37.

European Marine Site (SAC, SPA & Ramsar Site). Natural England's new high level conservation objectives for European Sites do not replace the detailed advice provided in the Regulation 33 (37) advice package for the Severn Estuary suite of European Sites. Its continued use is approved by Natural England and Natural Resources Wales.

3. Screening and assessment: fish species

3.1 Screening of Annex II fish species and typical fish assemblages

3.1.1 Natural England agrees with the screening-in of the Severn Estuary SAC, Severn Estuary Ramsar site, River Usk SAC, River Wye SAC and River Tywi SAC for the relevant Annex II migratory fish species and fish assemblages. New telemetry evidence collected by Swansea University has identified a risk of the HPC intakes to adult shad tagged in the River Tywi, Carmarthen Bay and Estuaries, and Pembrokeshire Marine SACs. Therefore, we support the inclusion of these sites – as identified within the Company's identified Zone of Influence (ZOI).

3.1.2 It is unclear how impacts upon European eel (*Anguilla anguilla*) have been considered, given that this species has continued to decline since the DCO was granted in 2013. European eel form part of the Severn Estuary SAC Assemblage of fish species and the Severn Estuary Ramsar Assemblage of migratory species. On this basis, Natural England recommends that impacts to eel are included in the Appropriate Assessment and represented in the compensation package.

3.2 Approach to assessment: entrapment effects on fish

3.2.1 Natural England encountered a number of difficulties in interpreting the quantitative assessment, which has undergone small, unexpected alterations since previous iterations. Broadly the entrapment values remain similar to those provided to Natural England in summer 2023, which we collectively agreed may inform initial compensation discussions. It is imperative that the impingement numbers, the compensation sufficiency estimates, and the supporting calculations for all quantitative assessments are assessed and agreed with the SNCBs and clearly presented in the documentation prior to the DCO material change application being submitted.

3.2.2 Natural England disagrees with the assertion that fish entrapment is a temporary impact. Given the expected lifetime of the project, we consider these to be lasting or generational impacts that will result in potentially adverse effects due to the long-term deterioration of qualifying features/sub-features. This remains consistent with the position taken by Natural England for offshore wind farms. Furthermore, it should be noted that many of the Annex II qualifying features are currently deemed to be in unfavourable condition. Therefore, there is an additional risk that such lasting impacts could reduce fish populations to a level from which they are unable to recover at the end of the project's lifetime.

3.2.3 Natural England remains concerned over the high level of uncertainty in the entrapment assessment. For example, the underpinning datasets contain high uncertainty/variability, which was well documented in the Hinkley Point C Public Inquiry held in June 2021. This variability/uncertainty is further evidenced by the difference between the CIMP1 and CIMP2 datasets. It is our view that this inaccuracy means that underestimation or overestimation of the predicted harm to the fish assemblage and Annex II migratory species is likely. We recommend that the risk of underestimating this harm is addressed by scaling up the package of compensatory measures accordingly.

3.2.4 The approach to assessment also contains high uncertainty. For example, new telemetry

evidence for twaite shad has shown that the differences between HPB and HPC intakes are more pronounced than estimated in the impact assessment. The risk to adult shad is much higher than predicted as they spend much more time near the intake locations than assumed. This position remains consistent with the findings of the Hinkley Point C Public Inquiry held in June 2021. For example, in his Report to the Secretary of State for Environment, Food and Rural Affairs², the Inspector noted that: *“This has significant implications in terms of the modelled numbers from the quantitative assessment”* (Para. 11.106, p.168). These omissions have yet to be addressed within the assessment. It is likely that this is also true for other species. Therefore, we recommend that the quantitative assessment is adjusted to take account of this increased risk and clearly presented in the documents.

3.2.5 It is Natural England's view that the uncertainty highlighted above is further compounded by an underestimation of the importance of Bridgwater Bay itself. The assessment includes a necessary assumption that fish are distributed evenly across the protected sites, when in fact there is a likelihood that protected species will be clustered in the areas of higher risk (near the HPC intakes). For example, studies have shown increased growth rates for species including juvenile twaite shad in areas such as Bridgwater Bay – highlighting its importance for feeding (e.g. Claridge & Gardner, 1978³). More recently, acoustic telemetry data and tracking studies conducted since 2018 and shared with the Company and Cefas have shown the ecological importance of Bridgwater Bay for adult Annex II twaite shad; with significant proportions of the individuals tagged and tracked from the River Severn, River Wye and River Tywi present in Bridgwater Bay for up to 11 months of the year for feeding, and significant proportions detected around and at the depths of the Hinkley C intake structures (Clarke et al., 2023⁴⁵).

3.2.6 In addition to the above, it should be noted that the proposed mitigation methods (the Low Velocity Side Entry (LVSE) system in particular) are novel and untested, which further increases uncertainty in the assessment. We would therefore expect to see this uncertainty clarified and addressed prior to the DCO material change application being submitted.

3.3 Shadow Appropriate Assessment: Entrapment effects on fish

3.3.1 We agree with the conclusions of the shadow Appropriate Assessment that it is not possible to exclude beyond reasonable scientific doubt that the operation of the project could lead to an adverse effect on the integrity of the Severn Estuary SAC and Ramsar site, River Usk SAC and River Wye SAC, via the fish entrapment pathway (linked to the marine design element) of the project.

3.3.2 Natural England encountered a number of difficulties in discerning the full justification behind each of the shadow Appropriate Assessment conclusions, due to the large amount of contradictory information provided in the explanations, lack of clear quantifiable data and evidence to support statements made. We recommend that the assessment conclusions and

² <https://www.gov.uk/government/publications/environmental-permit-appeal-removal-of-acoustic-fish-deterrent-conditions-from-water-discharge-activity-wda-permit>

³ Claridge, P. N., & Gardner, D. C. (1978). Growth and movements of the twaite shad, *Alosa fallax* (Lacépède), in the Severn Estuary. *Journal of Fish Biology*. 12, 203-211. <https://onlinelibrary.wiley.com/doi/10.1111/j.1095-8649.1978.tb04166.x>

⁴ Clarke, D. et al. (2023). *Empirical data versus expert opinion and environmental impact assessment– a case study of twaite shad (Alosa fallax) migration in the Bristol Channel*. First International Fish Impingement and Entrainment Conference, Institute of Fisheries Management July 2023. <https://ifm.org.uk/wp-content/uploads/2023/11/D-Clarke.pdf>

⁵ Clarke, D. et al. (2023). *Twaite Shad Movements Near Hinkley Point C Abstraction*. Report prepared for Environment Agency UK. 6th October 2023.

justifications are presented in a more streamlined manner. For example, the assessment includes lengthy counterarguments against the precautionary nature of the assessment, as mandated by the Habitats Regulations and supported by the Inspector's Report to the Secretary of State for Environment, Food and Rural Affairs² following the Hinkley Point C Public Inquiry held in June 2021.

4. Proposed compensatory measures

4.1 Summary of engagement to date

4.1.1 In September 2022, the Company approached Natural England, Natural Resources Wales and the Environment Agency to provide non-statutory advice on the provision of compensatory measures to meet the requirements of Regulation 68 of the Habitats Regulations. Engagement to date has taken the form of three face-to-face workshops, regular progress catch-up calls, and the provision of ad-hoc written advice. A detailed summary of engagement is provided in Annex B.

4.2 Alternative solutions and Imperative Reasons of Overriding Public Interest (IROPI)

4.2.1 We note that the shadow HRA provides an assessment of alternative solutions and IROPI pursuant to Regulation 64 of the Habitats Regulations. The competent authority (who we understand in this case to be the relevant Secretary of State) makes the decision as to whether there are no alternative solutions, and it is the role of the project proponent to supply sufficient information and justification to them to prove that this is the case. Natural England's role is to advise the competent authority on the acceptability of any alternative solutions.

4.2.2 It is not a requirement of the Habitats Regulations that a competent authority must seek the advice of the statutory nature conservation body when it is considering the case for IROPI for a potentially damaging plan or project. However, there may be circumstances where Natural England's advice is sought at this stage of the HRA.

4.2.3 For the reasons outlined above, Natural England has not provided specific pre-application advice to the Company on alternative solutions or the case for IROPI, or reviewed the assessment provided within the shadow HRA. However, it remains our view that the competent authority should conduct a thorough assessment of alternatives which takes account of best available technology pertaining to the design and maintenance of AFDs and other mitigation measures.

4.3 Sufficiency of proposed compensatory measures

4.3.1 **Role of the Secretary of State:** The Secretary of State, having regard to any advice from the SNCBs (and others as necessary) and ideally before authorisation is granted must be confident that the proposed compensatory measures will be sufficient to offset the predicted adverse effects in a way that protects the coherence of the National Site Network. The determination of sufficiency can be complex; particularly where uncertainty exists around the harm that is predicted to occur and the efficacy of proposed measures to offset this harm – as is the case with HPC. Natural England has considered this uncertainty when reviewing the scope and scale of the compensatory measures proposed in the shadow HRA.

4.3.2 **Assemblage of fish species:** The assemblage of fish species is a sub-feature of the Severn Estuary SAC 'Estuaries' qualifying feature. While it is correct that compensatory measures do not have to negate the precise nature of the risk to site integrity, we consider the assemblage to

be an integral attribute of the Estuaries feature that contributes to its Favourable Conservation Status. (FCS). Achieving FCS is the guiding principle for securing the conservation objectives of European Sites and the wider National Site Network. This position remains consistent with the findings of the Hinkley Point C Public Inquiry held in June 2021. For example, in his Report to the Secretary of State for Environment, Food and Rural Affairs², the Inspector noted that *“The ‘health’ of the estuary feature can only realistically be assessed through the maintenance or restoration of its habitats, which are a function of that geomorphology, and its ecology, of which a notable sub-feature is identified as the assemblage of typical species, many of whom are uniquely suited as migratory or marine species to this particular environment”* (Para. 11.33, p.153).

4.3.3 On the basis of the above, Natural England remains to be convinced that compensatory measures which benefit the Estuaries feature but fail to fully offset the harm to the assemblage of fish species will protect the overall coherence of the National Site Network. Case law⁶ states that in order to determine the nature of any compensatory measures, the damage to the site must be precisely identified. The operation of HPC will result in precise impacts upon fish species via entrapment, and in our view, measures should be targeted at compensating for that precisely identified damage in order to provide assurance that network coherence will be protected. We consider this approach to be consistent with the underpinning principles of a ‘compensation hierarchy’ – whereby measures should seek to address the same impact at the same location in the first instance.

4.3.4 For the assemblage of fish species, it is Natural England’s view that the creation and enhancement of saltmarsh are appropriate methods of compensation to consider, and we support further development of this approach. It is necessary to distinguish between the creation of saltmarsh at Pawlett Hams and the enhancement of saltmarsh at ‘the Island’; as the latter has an existing ecological function which will need to be considered when calculating its contribution to the compensation package. Furthermore, it will be necessary to take into account the uncertainty associated with implementing these measures, with respect to:

- the timescale for compensatory habitats to become ecologically functional, and the resultant contribution of these habitats in offsetting the predicted harm;
- the potential time-lag between impacts occurring and compensatory habitats becoming ecologically functional; and
- the long-term sustainability of created/enhanced habitats with respect to natural processes, climate change and sea level rise.

4.3.5 Based on the information provided, the proposed creation and enhancement of saltmarsh at Pawlett Hams and the Island could offset up to 31.4% of total fish production losses (based on CIMP1 data) and up to 79.8% (based on CIMP2 data). However, applying a conservative production to biomass ratio reduces this figure to between 15.7% (CIMP1) and 31.4% (CIMP2). It is important to note that the CIMP1 and CIMP2 datasets represent a snapshot in time, and the difference between them highlights the uncertainty around predicting harm to the assemblage of fish species. It is also important to acknowledge the proximity of Pawlett Hams and the Island to the HPC intakes, which could influence the effectiveness of these sites in offsetting losses. For this reason, Natural England recommends that a conservative production to biomass ratio is applied. However, irrespective of the approach used, we consider the **scale of compensatory habitat creation/enhancement to be insufficient to offset the total harm of the project.**

⁶ See Commission of the European Communities v Italian Republic (C-304/05) [83]

Therefore, we strongly recommend that the Company considers incorporating additional proposals in their package. These could include alternative sites for saltmarsh creation previously identified by the Company, together with options identified on the initial 'long-list' of compensatory measures (see paragraph 4.3.8).

4.3.6 Conservation value of proposed managed realignment sites: Pawlett Hams and the Island are wholly/partially located within the Severn Estuary SAC, Severn Estuary SPA/Ramsar site and the Bridgwater Bay SSSI; and thus the creation or enhancement of saltmarsh at these sites will result in impacts upon existing flora and fauna. We note that such impacts upon European sites have been considered within the shadow HRA but recommend that a similar exercise is conducted for the Bridgwater Bay SSSI, priority habitats and Protected Species which may be present on the site. For example, Pawlett Hams is noted for its freshwater ditch network and associated invertebrate assemblage (a qualifying feature of the SSSI); and is an important site for breeding lapwing. It is Natural England's position that additional mitigation and offsetting will be required to ensure that proposed compensatory measures do not result in a net loss of existing biodiversity and legislative requirements for nature are met.

4.3.7 Scope of proposed compensation: Natural England is supportive, in principle, of the proposal to compensate impacts upon the fish assemblage using a mosaic of habitat types. This approach offers the potential to benefit a greater range of fish species at different life stages, across a wider range of locations within the estuary or the species' natural range. An additional benefit of this mosaic approach is that some measures will take less time to implement than others – potentially reducing the time lag between impacts occurring and compensatory measures becoming ecologically functional. However, the information provided remains undeveloped and lacking in detail (particularly for seagrass, kelp and native oyster creation/enhancement) with respect to location, extent, proposed methodology and feasibility of success; timescale and resultant productivity. Consequently, **Natural England is currently unable to provide an informed view on the relative sufficiency of these compensatory measures with respect to offsetting the predicted impacts of HPC.** More broadly, we consider that there is greater uncertainty associated with the implementation, success and productivity of seagrass, kelp and native oyster reef compared to saltmarsh.

4.3.8 Additional compensation options: As stated in our previous advice letter of 08 June 2023 (Appendix C), we recommend that consideration is given to complementing habitat creation with alternative measures that seek to reduce pressures and/or increase protection for species within the assemblage. A number of these measures were included on the long-list of options drafted by the Company. We recognise that such measures may be outside of the Company's control but could be considered as viable compensatory measures by the Secretary of State – who has a statutory duty to secure any necessary compensatory measures. Examples include:

- the reduction of commercial fishing pressure in the Bristol Channel and its approaches;
- SAC extension/designation to protect fish species;
- protection of areas identified as essential fish habitat for species of concern.

4.3.9 Migratory fish: For the Annex II migratory fish species, it is Natural England's view that improving fish passage is an appropriate method of compensation to consider, although full barrier removal will deliver greater benefit than barrier easement. **While it is feasible that the removal/easement of three weirs (across a combination of the rivers Severn, Usk and Wye – or its tributaries) could be sufficient to protect network coherence, we are unable to advise on this aspect based on the information currently provided.** Further detail is

required to quantify the benefits of these measures with respect to the predicted impacts of HPC, within the context of an existing baseline. However, given the uncertainty associated with the predicted harm to migratory species, delivery timescales and functionality of these measures, we strongly recommend that the removal or easement of barriers is scaled up to account for this uncertainty.

4.4 Adaptive Monitoring and Management Plan (AMMP)

4.4.1 Natural England supports the proposal to implement a long-term Adaptive Monitoring and Management Plan (AMMP) to:

- measure the operational impacts of HPC against the conclusions of the assessment; and
- monitor the effectiveness of the compensatory measures against both the project objectives and site conservation objectives.

We acknowledge that fish populations are influenced by numerous environmental variables which will need to be carefully considered during the design of the AMMP.

4.4.2 While the implementation of a robust AMMP can address some of the residual uncertainty around predicted impacts and the efficacy of compensatory measures, we advise that this uncertainty is addressed as far as possible by ensuring the scale of compensation proposed is sufficient. The AMMP must not be used to address the current deficiency in scale of the proposed package.

4.4.3 The AMMP should be agreed and form part of a legally enforceable framework of post-consent action, which includes:

- timely reporting on the delivery and completion of measures;
- assessment of the operational impacts on fish species; and
- a periodic review of whether the ecological objectives are being met.

This review process will enable adjustments to the compensatory measures if required; either to improve the effectiveness of measures, provide additional compensation or potentially to avoid unnecessary over-compensation.

4.4.4 Natural England has previously provided advice to the Company on the structure and governance of the AMMP and welcomes the opportunity to continue contributing to its development and implementation. We support the initial proposal to establish an AMMP Advisory Group that is independently chaired, representative of key regulators/stakeholders and informed by an independent group of scientists.

5. Concluding remarks

In summary, Natural England agrees with the conclusion that it is not possible to exclude beyond reasonable scientific doubt that the operation of this project could lead to an adverse effect on the integrity of the Severn Estuary SAC and Ramsar site, River Usk SAC and River Wye SAC. On this basis, the competent authority may agree to this project if they are satisfied that there are no alternative solutions; imperative reasons of overriding public interest (IROPI); and compensatory measures can be secured to ensure that the overall coherence of the National Site Network is protected.

We have not commented on the assessment of alternatives and IROPI, as this duty lies with the

competent authority, but have reviewed the proposed package of compensatory measures. It is our view that the scope of these measures is appropriate, in principle, but the scale of delivery is insufficient to offset the total predicted harm of the project. Further work is required to demonstrate that the compensation package is sufficient, can be secured and delivered successfully.

I trust that this advice is helpful and would be happy to provide further guidance on any of the points raised in this response. We recognise that this pre-application consultation represents the preliminary stage of your DCO material change application and welcome the opportunity for continued engagement in this process.

Kind regards
