

Protected sites for nature in England

Submission from Wildlife and Countryside Link to the [OEP call for evidence](#)

April 2023

Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 70 organisations to use their strong joint voice for the protection of nature.

Introduction

As per the OEP's call for evidence and the England-only remit of Wildlife and Countryside Link, this submission only covers protected sites in England (SACs, SPAs, SSSIs) on land and freshwater.

An effective terrestrial protected site network is essential to recovering habitats and wildlife in the face of the [ever-declining state of nature](#) in England. A thriving and resilient ecological network of protected sites will also help achieve domestic and international environmental targets, including halting the decline of species abundance by 2030 and effectively protecting 30% of land and sea by 2030.

The terrestrial protected site network (including freshwater habitats) in England affords long-term protection mechanisms that, if used, would drive good management for many of England's important sites for nature.

Currently, however, the majority of protected terrestrial sites in England are in poor condition for nature. Only [37% of SSSIs are in favourable condition](#) for nature. While [49.8% of SSSIs are classed by Natural England as 'Unfavourable – Recovering'](#), this only means that these sites are covered by a management agreement, not that the management plan is comprehensive, being implemented, or that the habitats and wildlife on these sites are genuinely recovering. Almost [90% of SSSI units classified as 'river' in England](#) are in unfavourable condition. In reality, the condition of SSSIs is largely unknown and the true figures could be much lower, as [only 22% of SSSIs have been monitored](#) in the past six years. Protection from harm is not always secured and can be inconsistent.

Also, the terrestrial protected site network only covers 8% of England, much lower than the minimum of [16% of land that scientific evidence suggests](#) should be strictly protected and managed for nature to create a resilient ecological network in England. The protected site network does also not sufficiently cover and deliver for our most threatened species and some other taxa, including some plants and invertebrates.

Languishing in poor condition, terrestrial protected sites in England will not currently meet the Government's environmental targets, nor be able to contribute to halting the decline of nature. The Government was right to identify in the [Nature Recovery Green Paper](#) that the existing nature conservation site protections are not sufficient to restore nature, but wrong to suggest that reform is the best way to solve the problem.

To make a genuine difference for nature and ensure the terrestrial protected sites network in England is effective and fit for the future, the Government must set out proposals for more, bigger, better, and more joined up protected sites.

The existing terrestrial protected sites network in England must be strengthened, brought into good condition, and completed.

- Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) are the strongest and [most effective site protections in England](#). Previous Government reviews have found the legislation that protects them, the Conservation of Habitats and Species Regulations 2017 (also known as the Habitats Regulations) [to be fit-for-purpose](#), but its implementation should be improved to deliver better outcomes for nature and those interacting with the regulatory regime.
- Sites of Special Scientific Interest (SSSI) are designated under the Wildlife and Countryside Act 1981, but protection for these sites is [less robust and less effective](#) than protection for SACs and SPAs. If there were to be consolidation into a single designation, the new designation should be afforded the same level of strong protection that SACs and SPAs currently enjoy, as a minimum.
- Ramsar sites are currently treated as SACs/SPAs as a matter of policy – they should be put on the appropriate legal footing that they have been lacking for years.
- All protected sites in England must be brought into good condition through implementing and investing in Protected Site Strategies, delivering the actions in Site Improvement Plans, utilizing other management tools, and implementing a programme of regular monitoring. All important species must be identified on existing sites to ensure appropriate management and monitoring. To drive progress, the Government should introduce a legally-binding target that at least 75% of the SSSI network should be in favourable condition by 2042.
- The terrestrial protected sites network in England should also be completed by quickly designating new sites in order to create a connected and resilient ecological network across the country. The Government should implement Natural England's review of SSSIs and the [UK SPA Reviews](#) and set out an expedited and evidence-based process for designating sites.

The terrestrial protected sites network (SACs, SPAs, SSSIs and Ramsar sites) should contribute at least 10% to 16% or more of land to make up the core of the commitment to protect 30% of England's land by 2030. To make 30x30 meaningful, 30% of land and sea must be (1) protected for nature in the long-term and (2) well-managed for nature and regularly monitored to demonstrate good or recovering condition. Currently, the protected sites in England are only contributing [3.22% towards the 30% target](#), as of the 8% of England's land covered by SSSIs, only about a third of these sites are in favourable condition.

If strengthened for nature, large portions of protected landscapes (National Parks and Areas of Outstanding Natural Beauty), could also contribute to 30x30. Currently, only those parts of protected landscapes that are protected and managed for nature (currently, only the parts of these landscapes that are also designated as SSSIs and that are in good or recovering condition) should count towards 30x30. As recognised by Government in the Nature Recovery Green Paper, reform to the protected landscape designations will be required to deliver the changes needed to support large portions of National Parks and AONBs to be included in 30x30. Other Effective area-based Conservation Measures (OECMs) that are well-managed and subject to regular monitoring that demonstrate good biodiversity outcomes could also count towards the 30% target.

The 30x30 commitment should effectively protect the most valuable sites for nature in England to create a resilient, thriving connected ecological network, connected and buffered by the wider Nature Recovery Network on land, and supported by the integration of nature across the country.

A well-managed and effective protected sites network at the heart of meaningful delivery of 30x30 will be essential to help achieve Government's legally-binding target to halt the decline of species abundance by 2030.

This evidence submission covers:

- Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) designated under the Conservation of Habitats and Species Regulations 2017 and Ramsar sites (treated as SACs/SPAs as a matter of policy)
- Sites of Special Scientific Interest (SSSIs) designated for flora and / or fauna under the Wildlife and Countryside Act 1981
- Management and monitoring of terrestrial protected sites
- Designation of protected sites and completing the terrestrial protected sites network
- Other comments

Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)

Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), designated under the Conservation of Habitats and Species Regulations 2017 (also known as the Habitats Regulations), offer the most robust and effective protection to hundreds of important nature sites, including lakes, rivers and streams, in England. The Habitats Regulations cover the sites of greatest significance and international importance for nature, for which the UK has a special responsibility: breeding and resting sites for rare and threatened species, plus precious natural habitats that are at risk. SACs provide protection to a variety of special species and habitats and SPAs provide protection for rare and vulnerable birds and their habitats. These protections also extend to internationally important wetland Ramsar sites as a matter of policy.

SACs and SPAs are afforded a [higher level of legal protection](#) than Sites of Special Scientific Interest (SSSIs), with a legal requirement to assess potential impacts on protected sites (Habitats Regulations Assessment or HRA), a requirement to drive the improvement of nature within these sites or maintain the integrity of the UK protected site network, and legal protection from the risk of significant harm, except in cases of imperative and overriding public interest, and only then if no less damaging alternatives are possible and proper compensation is in place. By contrast, SSSIs are afforded legal protection through the Wildlife and Countryside Act 1981, which does not clearly cover offsite or cumulative impacts and which still allows development which is likely to have an adverse effect on an SSSI to proceed if the development's benefits are considered to outweigh the adverse effects on the SSSI.

There is robust evidence that SACs and SPAs are the most effective site protections. A [recent RSPB study](#) found that numbers of threatened birds are higher both within and in a 5km buffer zone around a protected area and a [British Trust for Ornithology \(BTO\) study](#) found that study sites with a greater proportion of protected land are home to higher numbers and more species of birds.

Multiple Government reviews have also found the Habitats Regulations, including the site protection rules for SACs and SPAs, to be fit-for-purpose. [Defra's 2012 review](#) (as well as the two previous reviews) concluded that 'in the large majority of cases the implementation of the Directives is working well, allowing both development of key infrastructure and ensuring that a high level of environmental protection is maintained.' Where costs and delays for developers do arise, the review points to these issues as stemming from implementation.

SACs and SPAs laws are fit-for-purpose, but could be better implemented. The legislation should be retained, strengthened and better implemented to improve their effectiveness for nature, people, and those interacting with the regulatory regime.¹

Essential aspects to retain:

The essential aspects of the legislation that provide the robust and effective protection for SACs and SPAs and that must be retained are:

- The duty (Regulation 9) for relevant authorities to establish conservation measures necessary to avoid deterioration of nature sites and to avoid disturbance to listed species.
- Robust site protection rules, including:
 - A requirement to maintain the integrity of the protected sites network and need to achieve all the network objectives;
 - The ability to require site management and improvement, and
 - A requirement to assess impacts on protected sites with a Habitats Regulations Assessment.
- A legal framework to assess impacts to protected sites, which must include:
 - The precautionary principle;
 - An assessment of indirect effects (the consideration of harm generated outside of the site in development applications);
 - An assessment of in combination/cumulative effects;
 - An assessment of a proposal's effect on the site's integrity, as well as the site's conservation objectives
 - A requirement to seek less damaging alternative solutions, and if there are none...
 - A bottom line/backstop for nature, i.e., projects should not be allowed to proceed if there are adverse effects, except for 'imperative reasons of overriding public interest' (IROPI), and
 - Legal requirements to secure compensatory measures where harm takes place.
- Favourable Conservation Status (FCS) must be retained as a legal concept and the goal of protection and management measures for sites (and species), with FCS being determined at local and regional, as well as national scales.
- The ability to drive strategic solutions to pressures on environmental limits and a framework to identify less-damaging solutions must be retained.

Opportunities to strengthen the Habitats Regulations:

The laws protecting SACs and SPAs could be better implemented, and improved for nature, people and those interacting with the regime, by:

- There should be better application of (a) checks for combined effects to assess whether combinations of projects or proposals would together have a significant effect on nature; and (b) of the precautionary principle.
- The Government should set out specific thresholds for risks of environmental harm that must not be exceeded in or around a protected site, such as levels of nutrient pollution, as a result of new developments. This would help to limit the number of inappropriate proposals that come forward and help reduce the need for costly assessment of plans that are clearly damaging.
- There should be strict limits on the types of development that can qualify for an exemption through the derogation process for 'imperative reasons of overriding public interest' (IROPI).

¹ The recommendations below include some for the Habitats Regulations Assessment (HRA), which was excluded from the scope of the call for evidence, but also wider site protection rules and their implementation.

For example, while flood defence might need to be considered, housing, transportation and leisure developments should not.

- The mitigation hierarchy should be reinforced in law to support its early consideration and the highest standard of implementation to ensure nature's recovery. Currently the mitigation hierarchy is present in guidance on appropriate assessment and in policy in the National Planning Policy Framework (NPPF), but it should be strengthened by being made a legal requirement.
- Increased funding and ecological expertise is urgently needed for all competent authorities (e.g., Local Planning Authorities) and statutory nature conservation bodies in order to properly and confidently review and conclude environmental assessments and decisions. The Regulation 9 duty for relevant authorities to establish conservation measures to avoid deterioration of nature sites and to avoid disturbance to listed species must be fully funded and supported.
- The quality, availability and comparability of environmental data, necessary to underpin good decision-making, should be improved. Data collected through the environmental assessment process should be shared and made available and usable for other purposes in accordance with the FAIR data principles to improve the existing environmental evidence base, which can then be mobilised for future environment assessments and inform best practice.

Ramsar sites:

Ramsar sites are currently treated as SACs/SPAs as a matter of policy – they should be put on the appropriate legal footing that they have been lacking for years.

Sites of Special Scientific Interest (SSSIs)

Sites of Special Scientific Interest (SSSIs) are designated under the Wildlife and Countryside Act 1981 (as amended) and offer protection to nationally designated sites for nature conservation. While the majority of the SSSI network has greater protection by also being designated as an SAC or SPA, the SSSI designation lacks the robust and effective legal protection of an SAC or SPA designation.

SSSIs are afforded legal protection through the Wildlife and Countryside Act 1981, [which does not clearly cover](#) offsite or cumulative impacts and which still allows development which is likely to have an adverse effect on an SSSI to proceed if the development's benefits are considered to outweigh the adverse effects on the SSSI. By contrast, SACs and SPAs are protected from the risk of significant harm, except in cases of imperative and overriding public interest, and only then if no less damaging alternatives are possible and proper compensation is in place. As well, in comparison to SACs and SPAs, [SSSIs lack a legal requirement](#) to assess potential impacts on protected sites (Habitats Regulations Assessment or HRA) and a requirement to drive the improvement of nature within these sites or maintain the integrity of the UK protected site network and protection against harm.

If there were to be consolidation into a single designation, the new designation should be afforded the same level of strong protection that SACs and SPAs currently enjoy, as a minimum. As outlined above, the legislation that protects SACs and SPAs should be better implemented in order to deliver better outcomes for nature – this should also be applied to SSSIs, if raised up to SAC/SPA level.

Management and monitoring of terrestrial protected sites

All protected sites in England must be brought into good condition through implementing and investing in Protected Site Strategies, delivering the actions in Site Improvement Plans, utilizing other management tools, and implementing a programme of regular monitoring. All important species must be identified on existing sites for appropriate management and monitoring.

Targets:

We welcome the SSSI condition targets in the Environmental Improvement Plan for all SSSIs to have an up-to-date condition assessment and for 50% of SSSIs to have actions on track to achieve favourable condition by 31 January 2028, but these interim targets set out in the EIP are no substitute for legally-binding targets. The Government should set a target that at least 75% of the SSSI network should be in favourable condition by 2042. This should be set as a legally binding target for the condition of terrestrial protected areas should be set [under the Environment Act powers](#) as a matter of urgency to ensure that these sites are able to drive nature's recovery.

Site Improvement Plans and Protected Site Strategies:

Site Improvement Plans (SIPs) could play an important role in driving the recovery of protected sites but their implementation has been limited. Where SIPs exist and offer a quality assessment of the actions needed to restore sites and species, the SIP actions should be incorporated into Protected Site Strategies created by the Environment Act 2021 and delivered.

Protected Site Strategies should also identify critical thresholds for adverse effects in order to help screen out more plans and projects, set proactive management measures needed to get sites and species into good condition and aid effective mitigation of impacts and incorporate more Supplementary Conservation Objectives Advice.

There should be a statutory obligation on public bodies to deliver, and report on progress against, the SIP actions as well as compliance with Protected Site Strategies.

Species:

Protected sites are not always delivering for species, at least for some taxa. All relevant protected sites should be used for species recovery, but there can be a disconnect between the sites objectives and the habitat management delivered.

Not all relevant SSSIs have been notified for relevant interest features, which can result in a species not being included for monitoring and appropriate management. Site documentation often do not list all the relevant interest features or outline the detail necessary to monitor the species, impeding good monitoring and appropriate management. For example, many reptiles and amphibians are not notified on individual SSSIs although they might be relevant species. This can lead to inappropriate management and can lead to declines, and in some cases such as the adder, even extinction, in some units or protected sites.

Management tools:

Sites in the terrestrial protected site network must be brought into good condition by better applying existing management tools. The existing strong obligations for good management for habitats and species in the Habitats Regulations should be retained. The management tools in the Wildlife and Countryside Act 1981, such as powers for conservation agencies to refuse consent for damaging activities on SSSIs and the introduction of management notices to combat neglect on SSSIs, should be considered and applied to bring sites into good or recovering condition.

Duties for public bodies:

Public bodies (known as Section 28G authorities under the Wildlife and Countryside Act) are required to ensure they take reasonable steps to further the conservation and enhancement of SSSIs. However, there are no adverse consequences for such bodies if they fail to meet their obligations and no mechanism to hold them to account, nor is there any reward or recognition where such bodies are meeting their responsibilities with regard to SSSIs. Addressing these issues will require strong direction from Central Government and a redirection of resources to ensure that

public bodies are able to prioritise long-term nature recovery over short-term commercial interests. Changes are also needed to prevent the statutory undertakers from carrying out damaging activities within protected areas.

Environmental Land Management scheme:

While a targeted, robust and well-funded Environmental Land Management (ELM) scheme could play an important role in contributing to the positive management of land for nature, the recent rollback of the scheme, the reduced funding pot for the higher tier schemes, and the lack of long-term contracts means ELM is unlikely to make a significant contribution to managing land for nature's recovery, including in combination with other site designations. This must be addressed if the Government is to have any hope of meeting its 30 by 30 commitment and EIP target for SSSI recovery to favourable condition.

Other management tools:

There are a variety of other management tools available to promote and ensure good condition of protected areas in England, as identified in the call for evidence. In general, these tools are not well or sufficiently used. Since 31 January 2021, [Natural England has used the statutory powers](#) provided by management schemes under section 28J of the Wildlife and Countryside Act 1981 on nine occasions; management notices under section 28K of the Act on one occasion; and compulsory purchase under section 28N and byelaws under section 28R of the Act have not been used.

For example, Natural England recently consulted on its approach to using byelaw powers under section 28R, with the aim of improving its capability to exercise the powers available to protect SSSIs. As a result, a set of operational principles and Defra-approved model byelaws were developed ready for use.

Where monitoring shows the condition of one or more features to be static or declining, Natural England should take steps to address this through a management agreement or use of other powers.

A whole-site approach to site management and selection:

We support a whole-site approach to site selection and management for terrestrial sites, but only in addition to the existing features-based approach. Given that England is one of the most nature-depleted countries in the world, in many cases sites represent one of a few remaining strongholds of a particular habitat or species – we must therefore do everything to support the persistence and recovery of such key features.

The current features-based approach is valuable in directing management, evaluation and assessment of damaging activities, but whole-site approaches offer the potential to improve overall management and ecological function of a site and more flexible management to deliver benefits to many species and habitats. Expanding the number of features for different sites and applying a whole-site approach in addition to a features-based approach will enable better connectivity and resilience of protected nature sites, especially in the face of climate change. While we accept that some features may be lost to climate change impacts, this flexibility must only be used in those circumstances where it can be proven that climate change and/or extreme events have caused the loss of a feature from a particular site and that it is not used where a site has deteriorated or been lost due to lack of management or neglect. And where this is the case, other measures must be taken (for example elsewhere in the protected sites network) to ensure that the Favourable Condition of the feature is not affected, and that no species is 'left behind' as a result of such action.

Improved monitoring:

The current SSSI monitoring system does not adequately assess recovery. Sites that are classified as 'Unfavourable – Recovering' are usually done so based on the fact that there is a management agreement in place which is thought will deliver favourable condition. However, management agreements are not always implemented, and even when implemented, can fail to achieve favourable condition.

It is important that species are not overlooked in monitoring. Some taxa of species are often overlooked for monitoring, and as a result, the protected site network is less likely to work for these species if there are any issues facing a species on a site or if the habitat management on the site is not appropriate for these species.

Natural England should consider and consult on proposals for an approach to management and monitoring that would result in more accurate condition assessments and actually put sites on a trajectory towards recovery.

Regular programme of monitoring:

At present, 78% of SSSIs have not been monitored in the last six years. Regular and appropriate monitoring of sites to assess their condition and ensure the implementation and effectiveness of management measures is essential for putting sites on a path to recovery. Resources and expertise are crucial for statutory bodies and landowners to deliver the management measures that are required to get protected sites into good condition for nature.

Compliance and enforcement of protected sites law:

A recent [Natural England report](#) on their enforcement activity from 2018 – 2022 reveals that on 4100 SSSIs in England, 21 offences were recorded – 9 of which were minor and were concluded using warning letters and 12 of which were served with civil sanctions. Of these, only 8 enforcement undertakings were agreed (a proposal to take steps that would make amends for non-compliance and its effects) and no criminal proceedings were brought in 2021 – 2022.

Over the reporting period, the number of civil sanctions during this time however has increased, with peaks of 15 and 12 in 2020/21 and 2021/22, indicating an overall decline in enforcement action in relation to SSSI's but a small rise in the severity of offences and resulting use of civil sanctions. This indicates a decline in NE's capacity to carry out enforcement with respect to SSSIs.

Resources and expertise for Natural England and other public bodies:

Unfortunately, years of under-resourcing of Natural England has left it lacking the sufficient resources, capacity, and expertise to fulfil its statutory functions. From 2010 to 2019, NE's funding saw a [decline of 72%](#).

NE has not been able to properly fulfill its statutory duties such as the monitoring of SSSIs ([78% of SSSIs have not been monitored in the last 6 years](#)) and exercising its regulatory tools to secure the good management of SSSIs (these tools have been used [on 9 occasions in the last 20 years, covering 0.2% of SSSIs](#)).

Increased funding and ecological expertise are urgently needed for Natural England and all competent authorities (e.g., Local Planning Authorities) and statutory nature conservation bodies in order to properly and confidently apply and enforce environmental regulations and site protection rules.

The Regulation 9 duty for relevant authorities to establish conservation measures to avoid deterioration of nature sites and to avoid disturbance to listed species must be fully funded and supported.

Designation of protected sites and completing the terrestrial protected sites network

Currently, the terrestrial protected site network only covers 8% of England, much lower than the minimum of [16% of land that scientific evidence suggests](#) should be strictly protected and managed for nature to create a resilient ecological network in England. These protected sites [should cover at least 10% to 16% or more of land](#) to make up the core of the 30x30 commitment.

The evidence suggests that the current protected area portfolio does not sufficiently cover our most threatened species and that many protected areas are only managed for their designated features, rather than for all priority species found on site.

The terrestrial protected site network should be completed by implementing Natural England's review of SSSIs and the UK SPA Reviews and by setting out an expedited process for designating sites.

The recommendations from the UK SPA Review in 2016 have still not been published or implemented. To make matters worse, many of the recommendations from the previous review in 2011 have also not been implemented. These reviews, carried out by a working group of leading experts, have found critical gaps in England's protected sites network for many of our most vulnerable species including curlews, hen harriers and puffins.

There are many other important sites for nature that have been identified but not designated, such as ancient woodland, important wetlands sites, including new potential Ramsar sites, Important Invertebrate Areas and Important Plant Areas. There should also be a targeted review of protected sites for taxa with inadequate coverage and representation, such as invertebrates, lichens and fungi.

Other important considerations in the expansion and creation of a [resilient protected site network](#) are connectivity, climate change and systematic conservation planning.

All sites identified as meeting the criteria for SSSI should be considered for designation, rather than just a representative sample. The law currently states that any area of land which is of special interest by reason of its flora, fauna, geological, geomorphological, or physiographical features should be designated and the JNCC guidelines identify the need to designate all that remains of rare and endangered habitats and species as well as a representative sample of widespread and common types. The partially completed Natural England review of the SSSI network should be completed and implemented. We welcome the revision of the SSSI site selection guidelines for a range of species and habitats, which updates, in some circumstances, guidance produced in 1989.

A whole-site approach to site selection:

We support a whole-site approach to site selection for terrestrial sites, but only in addition to the existing features-based approach. Given that England is one of the most nature-depleted countries in the world, in many cases sites represent one of a few remaining strongholds of a particular habitat or species – we must therefore do everything to support the persistence and recovery of such key features.

Expanding the number of features for different sites and applying a whole-site approach in addition to a features-based approach will enable better connectivity and resilience of protected nature sites, especially in the face of climate change. While we accept that some features may be lost to climate

change impacts, this flexibility must only be used in those circumstances where it can be proven that climate change and/or extreme events have caused the loss of a feature from a particular site and that it is not used where a site has deteriorated or been lost due to lack of management or neglect. And where this is the case, other measures must be taken (for example elsewhere in the protected sites network) to ensure that the Favourable Condition of the feature is not affected, and that no species is 'left behind' as a result of such action.

Improved incorporation of species in site designation:

All new site designations should take account of the range of habitats used by species, where possible. New single species interest features identified as part of the revision of the SSSI selection guidelines (for example, common toad and adder) need to be included, especially where there are sites which are known to be important for the species.

On existing sites, all appropriate species should be designated as interest features. There should be a significant data gathering effort for all relevant interest features on protected sites as part of a programme of regular monitoring, to inform appropriate habitat management.

An expedited site designation process:

Part of the reason for the incompleteness of the protected site network is the time and cost involved in designations. The Government should invest in and streamline the process for designation of SACs, SPAs, and SSSIs to rapidly complete the network, safeguarding the remaining fragments of priority habitats and important places for wildlife around the country.

The current evidence-based approach to designation, where statutory agencies have a duty to identify sites that meet the clear objective criteria based on scientific evidence, which are not influenced by political drivers, and the consultation process where experts can input on site designation, must be retained.

Other comments (see full list on OEP call for evidence [here](#))

There is a lack of clarity around how the protected sites network (SACs, SPAs, and SSSIs) integrate with other initiatives, including around species recovery. It is unclear what the role of the protected site network is in delivering overall outcomes for species. There could be better integration of sites and species policy and other policy areas, for example, fisheries policy.

In general, there is a lack of appropriate and up-to-date environmental data in England, including to evaluate the effectiveness of protected sites for habitats and species recovery in England. These gaps have been highlighted recently by the OEP's 2022 report '[Taking stock: protecting, restoring and improving the environment in England.](#)'

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