Technical Appendix 7.6: Outline Nature Enhancement Management Plan

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Technical Appendix 7.6: Outline Nature Enhancement Management Plan

Contents

Introduction

Overview

This Technical Appendix details the enhancement measures that will be implemented for the Appin Wind Farm (hereafter referred to as the 'Proposed Development'). Mitigation measures that will be adopted are detailed in **Chapter 7: Ecology** and **Chapter 8: Ornithology**.

This Technical Appendix (Outline Nature Enhancement Management Plan (ONEMP)) has been prepared to accompany **Chapter 7: Ecology** and **Chapter 8: Ornithology** of the EIA Report.

This ONEMP accords with the National Planning Framework 4 (NPF4) policies as outlined herein.

The Proposed Development, together with this associated ONEMP, has been sensitively designed around areas of carbon-rich soil (and any areas of deeper peat) (refer to **Chapter 6: Geology, Hydrology and Peat**), and has not resulted in the loss of any priority peatland of possible national interest. A key focus of Policy 3 of NPF4 is biodiversity enhancement through restoration of degraded habitats and strengthening nature networks, which this ONEMP delivers. Furthermore, NPF4 Policy 5 provides significant protection for peatland and carbon-rich soils. Restoration of carbon-rich habitats is also a key component of this ONEMP.

This Technical Appendix presents outline nature enhancement management principles to be finalised in consultation with NatureScot and Dumfries and Galloway Council (DGC) following receipt of planning consent and thereafter implemented as a Nature Enhancement Management Plan (NEMP) in accordance with condition 26 of the proposed Appin Wind Farm Conditions which states, '*There shall be no Commencement of Development until a Habitat Management Plan (HMP) taking account of the Outline Nature Enhancement Management Plan (Technical Appendix **7.5** of the EIA Report)], has been submitted to, and approved in writing by the Planning Authority'*

The finalisation of the ONEMP will be completed prior to commencement of development, with the final agreed NEMP being implemented by the end of the first year of operation of the Proposed Development. The NEMP will remain in place as agreed, subject to monitoring of effectiveness, for the remaining operational lifetime of the Proposed Development as consented. A Steering Group and Review Committee (SGRC) comprising of NatureScot, DGC and the Applicant of the Proposed Development (and others as appropriate) will be set up to oversee the effectiveness of the NEMP.

The Applicant is committed to the delivery of appropriate nature enhancement during future ongoing development of the ONEMP, and subsequent NEMP.

Aims and Objectives

The purpose of the NEMP as implemented will be to ensure creation and ongoing management of habitats at the Site to enhance biodiversity in accordance with the principles outlined in NPF4, Policy 3. The intent of Policy 3 is to *'protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks', with the outcome that 'biodiversity is enhanced and better connected including through strengthened nature networks and nature-based solutions'*.

The ONEMP includes six key aims to improve and enhance biodiversity at the Site:

- ditch blocking to improve and enhance the carbon-rich soils in open habitats on Site;
- enhance fisheries and other aquatic wildlife habitats on Site through riparian tree planting;
- improve invertebrate habitat opportunities through pond creation and retention of dead-wood;
- improve nesting/roosting and foraging opportunities for birds and bats through broad-leaved planting and the deployment of bird and bat boxes;
- improve the condition of the Ancient Woodland Inventory (AWI) habitat on-Site through the restoration of native woodland; and
- control of grey squirrel (*Sciurus carolinensis*) populations

On-Site Conditions and the Proposed Development

The Site is illustrated as the red line application boundary on **Figure 7.12.**

Detailed baseline habitat descriptions of the Site are provided within **Chapter 7: Ecology**, and **Technical Appendix 7.1**. Information on the Site is also provided in EIA Report **Chapter 3: Site Description and Evolution**, **Chapter 4: Description of the Proposed Development**, and **Chapter 6: Geology, Hydrology and Peat** with respect to the peat and hydrology interest on the site.

In summary, the Site is upland in nature, hill tops are open and mostly consist of acid grassland habitats with some areas of neutral grassland. The Site is dominated by commercial forestry, mostly Sitka spruce with some larch, all at various ages of growth, ranging from some large areas of clear-fell to fully grown trees ready for felling. Within the commercial forestry are some small pockets of plantation broad-leaved trees, marshy grassland and areas of dense bracken, with more open habitats concentrated along the Appin Burn and tributaries. Heavy grazing from sheep and deer has been recorded within grassland and isolated bog habitats within the Site.

Within the Site, 0.64 ha of peatland (M20) has been identified, this is situated within a localised/isolated location adjacent to commercial forestry on-Site. NatureScot guidance (NatureScot, 2023) assesses M20 peatland as 'unlikely to raise issues of national interest'. Due to the degraded nature of the peatland caused by drainage issues as a result of nearby forestry, this M20 peatland is assessed as not being priority peatland. As such, no priority peatland has been identified on-site.

In a ride between conifer plantation on 'Peat Rig' in the north of the Study Area the carbon-rich soil is 50 to 60 cm deep and moist, but considered to be suffering from drainage due to the presence of the nearby forestry. However, the bog community here remains fairly healthy with frequent bog mosses including acute-leaved bog-moss and papillose bog-moss being present and frequent bog asphodel. The vegetation does show elements of the M19 *Calluna vulgaris - Eriophorum* mire, with constant acute-leaved bog-moss and red-stemmed feather moss. This suggests it may represent an impoverished M19 bog community that has been subject to burning or severe grazing. Further information is provided in **Technical Appendix 7.1**.

The Proposed Development will result in the direct permanent habitat loss of 28.25 ha; comprising coniferous woodland – plantation (8.95 ha), recently felled woodland (0.35 ha), marshy grassland/bracken mosaic (0.09 ha), acid grassland (18 ha) and existing track (0.86 ha). To facilitate the access track there will be 11.56 ha of direct permanent loss (comprising coniferous woodland – plantation, acid grassland, marshy grassland, scrub, hedgerow and dry heath). For further detail on habitat loss areas and calculations refer to **Chapter 7**.

Overview of Aims and Objectives

Approach to ONEMP

The Proposed Development has been designed to minimise potentially significant effects on sensitive ecological and ornithological features and peat reserves. A description of the Proposed Development is provided in **Chapter 4: Description of the Proposed Development**.

Opportunities for restoration and enhancement of habitats with carbon-rich soils have been identified which in turn aim to enhance the biodiversity, flood storage and carbon sequestration/storage of the Site. Further enhancement works are proposed which will include improvement in the quality of habitats on-site (with subsequent benefits for wildlife, including invertebrates), increasing nesting and foraging opportunities for wildlife, including birds and bats on-site, improving habitat connectivity through the Site, and providing benefits to aquatic wildlife through riparian tree planting. These measures will have multi-faceted benefits for biodiversity and will improve habitat connectivity and nature networks in, and through, the Site.

Impacts on protected species or neighbouring habitats will be minimised during the implementation of the NEMP, and derogation licences would be obtained from NatureScot, if necessary.

The aims, objectives and habitat management measures outlined herein will be further refined and prescribed through detailed on-Site investigation work and further consultation with NatureScot and DGC, post-consent.

Accordance with NPF4

This ONEMP, and subsequent NEMP, accords with the NPF4 policies which are relevant to development proposed on peatland, carbon-rich soils and priority peatland. As well as tangible enhancements in terms of biodiversity and woodland/tree cover.

The Proposed Development is sensitive to the location of deeper areas of peat (refer to **Figure 6.7**). A key focus of Policy 3 of NPF4 is that significant biodiversity enhancement through restoration of degraded habitats and strengthening nature networks is delivered. Furthermore, NPF4 Policy 5 provides significant regard and protection for peatland and carbon-rich soils. As such, ditch blocking to restore degraded bog habitat is proposed within the Site.

The habitat enhancement measures will also enhance biodiversity on-Site in accordance with Policy 3 of NPF4, through for example, restoring degraded habitats (including habitats with carbon-rich soils and poor-quality AWI habitat) and strengthening nature networks (such as through riparian tree planting) and connections between them.

NPF4 Policy 6 also states that "*development proposals that enhance, expand and improve woodland and tree cover will be supported*". The ONEMP will aim to enhance, improve and/or plant new trees as part of the design. Tree planting is accordingly proposed for the Proposed Development both within existing plantation woodland in the east (within an area on the AWI), and along Appin Burn in terms of riparian tree planting.

Within this ONEMP, those watercourses to be targeted for riparian tree and woodland planting (as stated above), aim to improve aquatic conditions for wildlife, as well as providing shelter and foraging opportunities for bird species (like black grouse *Lyrurus tetrix*) and improving habitat connectivity for foraging and commuting bats. Riparian planting also helps to slow waterflows to support flood risk management and can improve water body status, as stated by Scottish Forestry[1].

Buglife Partnership

The Applicant has a partnership with UK charity Buglife, a conservation trust focusing on the protection and enhancement of invertebrates in the UK. Invertebrates are key to healthy ecosystems. From pollination, dispersing seeds, providing food for wildlife, recycling nutrients and cleaning water, insects and pollinators play a critical role in life on our planet; without them whole ecosystems would collapse. In a UK wide study, it was found that the UK's flying insect population has decreased by as much as 58.5 % in the last 20 years (Ball *et al*., 2022), this decline could potentially be fatal for habitats and ecosystems across the UK as well as many ecosystem services we rely on. Resources available, as well as the extent of habitat restoration areas provided, mean that renewable energy projects can play a pivotal role in halting this dramatic decline. The partnership between the Applicant and Buglife allows bespoke habitat management measures to be incorporated into this ONEMP (and subsequent NEMP, if the Proposed Development is consented), helping achieve sustainable populations of invertebrates locally and, in light of NPF4 Policy 3, support in delivering biodiversity enhancement within, and improving habitat connectivity through, the Site.

Aim 1: Ditch blocking to improve and enhance the carbon rich soils in open habitats on Site

Objective 1: Enhance carbon rich soils

This objective will complement the Outline Peat Management Plan (**Technical Appendix 6.3**) and mitigation commitments made in **Chapter 6: Geology, Hydrology and Peat**. It is proposed that ditches will be blocked to promote re-wetting (where this is appropriate and will not interfere with estate management or operational activities of the Proposed Development).

Blocking existing drains to retain rainwater will allow the water table to re-stabilise and peat-forming *Sphagnum* species to colonise areas that have dried or been affected by commercial forestry, peat cutting or milling. It is proposed that 22.96 ha of rewetting is feasible due to ditch blocking.

Within the Site, 0.64 ha of peatland (M20) has been identified, this is situated within a localised/isolated location adjacent to commercial forestry on-Site. NatureScot guidance (NatureScot, 2023) assesses M20 peatland as 'unlikely to raise issues of national interest'. Due to the degraded nature of the peatland caused by drainage issues as a result of nearby forestry, this M20 peatland is assessed as not being priority peatland and no priority peatland has been identified on-site.

Aim 2: Enhance fisheries and other aquatic wildlife habitats on Site through riparian tree planting

Objective 1: Management of bank-side vegetation

Fish habitat surveys identified Appin Burn as suitable to support juvenile fish fauna, salmonids and non-migratory fish. All other watercourses surveyed were either negligible or unsuitable for fish (refer to see **Technical Appendix 7.4**).

Liaison with Buglife highlighted that riparian planting can help mitigate increasing temperatures of water due to climate change and therefore improve habitat suitability for species such as riverflies.

Native riparian tree planting can deliver benefits for fisheries and invertebrates, including the casting of shade, maintenance of cool water temperatures, provision of cover and sources of food from in-falling litter and insects. The cooling of water temperature is particularly key given the increasingly warming climate, and the negative impact this is likely to have on aquatic wildlife.

Areas for appraising for riparian tree planting proposed is shown as 'Riparian Woodland Planting (Mainly Native Broadleaved Woodland)' in **Figure 7.12** and will be up to 5,505.96 m along Appin Burn.

Based on a review of aerial imagery, Appin Burn appears to be largely devoid of tree cover, at the upstream stretches. It is considered unlikely that the whole 5,505.96 m length will be planted, and the specific areas will be agreed through consultation at the detailed design stage.

[1] Scottish Forestry (2024). Scottish Forestry Open Data. Target Woodlands for Riparain Planting. Available at: https://open-data-scottishforestry.hub.arcgis.com/datasets/96f7766709644e669de11d01b472bf40/explore.(Accessed 26/02/2025).

Riparian planting will have multi-faceted benefits for biodiversity. As well as providing shelter, feeding and roosting opportunities for wildlife (including black grouse), riparian planting will increase habitat connectivity through parts of the Site (whilst being sensitive to the locations of proposed turbines). Watercourses are also an appropriate distance from proposed turbines to ensure the mortality risk to bats from collisions is not increased.

Areas for riparian tree planting will remain sensitive to the potential for exacerbating potential impacts on sensitive species (e.g. avoiding tree planting on more sensitive habitats in terms of peat). Areas of planted trees will be protected from grazing pressure, likely through the construction of marked fencing. Once installed, fencing will be monitored as part of the NEMP to appraise grazing pressure, and to establish if/when fencing can be removed.

Prescriptive measures for inclusion within this ONEMP will be agreed with NatureScot, DGC, Nith District Salmon Fishery Board and Buglife.

Aim 3: Improve invertebrate habitat opportunities through pond creation and retention of dead wood

Objective 1: Enhance habitat for aquatic invertebrates

It is proposed a pond will be created in Borrow Pit 3 once the Proposed Development becomes operational. Ponds are a priority habitat in the UK Biodiversity Action Plan (BAP), therefore, creating a pond can contribute to the national Pond Habitat Action Plan (HAP). Ponds also provide habitats for a variety of BAP priority species.

Many species, particularly invertebrates are largely restricted to ponds. Therefore, ponds represent an important freshwater resource for invertebrates.

Pond design and creation will be agreed with NatureScot, DGC and Buglife. The key design principles of creating a pond to provide habitat for the widest range of freshwater wildlife (Freshwater Habitats Trust, 2022) are listed below:

- pond complexes;
- shape, size, permanence, depth;
- shallow edges;
- undulations and broad drawdown zone; and
- leave ponds rough.

Objective 2: Enhance habitat for terrestrial invertebrates (deadwood)

To facilitate the Proposed Development 22.03 ha of permanent woodland loss is anticipated. Some timber and brash from felling will be retained on-site and used to enhance habitats for invertebrates. Any excess of felled timber will be stored to be used and deployed during the monitoring regime to further enhance and maintain favourable habitats for invertebrates.

Deadwood piles will be created from brash and felled timber. Old and diseased timber can also be used as they are often the most important providers of habitat for invertebrate species. Piles of deadwood will be exposed to a range of sunshine and shade, dry and damp conditions to increase the range of micro-habitats available for saproxylic species[2].

Another specialist dead-wood habitat is that of submerged and semi-submerged timber. Selected areas which are boggy in nature will be managed to ensure that timber enters the system (hence the requirement to store and use excess timber during monitoring). When felling in such locations, some fallen timber of a variety of sizes will be left in the water. Additionally, semi-submerged logs in streams are important for hoverflies and other species such as craneflies. They will be retained and not cleared out of waterbodies and ditches. The larvae of caddisfly species also live or feed on submerged wood.

Prescriptive measure for the locations of created deadwood piles and submerged deadwood will be agreed with NatureScot, DGC and Buglife. A deadwood plan within the Site will be designed by a suitably competent ecologist for incorporation into the NEMP.

Objective 3: Enhance habitat for terrestrial invertebrates (bug hotels)

Bug hotels are constructions that encourage pollinators and offer shelter for invertebrates, either to hibernate, breed or live.

Bug hotels can be constructed from natural (i.e. sticks, dry leaves, hollow stems, straw/hay, stones and bark) and/or artificial (i.e. corrugated card, tiles, bricks, rubble) material. Natural materials are preferred and will be prioritised

[2] Species that rely on dead or decaying wood for at least part of their life cycle.

on-site. Locations of bug hotels will seek to combine sun and shade. For bees the south-facing side of the bug hotel will be situated in full sun (Buglife, 2019).

Prescriptive measure for the locations of bug hotels will be agreed with NatureScot, DGC and Buglife. A bug hotel plan within the Site will be designed by a suitably competent ecologist for incorporation into the NEMP.

Aim 4: Improve nesting/roosting and foraging opportunities for birds and bats through broad-leaved planting and the deployment of bird and bat boxes

Objective 1: Enhance habitat for birds

No black grouse were recorded during the baseline surveys undertaken (refer to **Technical Appendix 8.1**) however some (isolated) suitable habitat to support black grouse is present on-Site (open habitats on the Site's periphery, and potentially along open rides and clearings). Tree planting (including riparian planting) has potential to benefit black grouse (as well as other bird species). Riparian planting will include both continuous and discontinuous shrub and tree dominated planting. Discontinuous areas of planting will ensure that extensive shading of existing food plants (e.g. grasses, heathers and bilberry (*Vaccininum myrtillus*), where present) for black grouse does not occur, with tree and shrub species planted selected for their preference by black grouse such as (amongst others) birch (*Betula spp*.), juniper (*Juniperus communis*), willow (*Salix* species), and rowan (*Sorbus aucuparia*). Such plant species provide additional food sources for black grouse in the spring and winter, together with suitable cover from predation for both adults and broods. The riparian planting will be >500 m from the proposed turbines so that effects on any black grouse encouraged by the planting will not be adversely affected by the operation of the Proposed Development.

The creation of linear habitat features like riparian treelines will provide opportunities for a variety of bird species. Scrub and tree species of local provenance (prioritising fruit-producing species and black grouse forage species; see above) which will provide nesting and foraging resources for many bird species will be chosen.

Additionally, Aim 3 will also benefit birds; invertebrates in upland moorland or bog habitats are an essential component of the diet of many bird species; cranefly larvae and adults have been shown to be important food for grouse chicks. Adult grouse may also eat craneflies to supplement their diet of heather shoots (Buglife, 2019).

Managing habitats to benefit these invertebrates is thus likely to have a significant impact on the success of bird species.

Objective 2: Enhance breeding and foraging habitat for ground-nesting birds

Improving condition of habitats with carbon-rich soils on-site will benefit ground-nesting birds, particularly wading species. Waders will benefit from areas of peatland being 're-wetted' as this will increase the foraging potential (invertebrate prey in the soil) and make the ground softer for wader's bills to probe. There are likely to be areas which are on slightly higher ground/mounds such as tussocks which will remain dry for nesting, and accordingly there will be benefits to both breeding and foraging birds, which will both be important for breeding success.

Objective 3: Improve commuting and foraging corridors for bats

Bats will benefit from the creation of treelines along riparian corridors and this will improve foraging and commuting opportunities for bats through the Site (noting that no planting will be undertaken within an appropriate 'bat buffer' (minimum 96 m) from proposed turbines to minimise collision risks to bats). Tree planting will also benefit a host of other wildlife and will improve habitat connectivity and habitat networks in and through the Site.

Additionally, Aim 3 will also benefit bat species; invertebrates are prey for bats, therefore managing habitats to support invertebrate populations will also benefit foraging opportunities for the local bat population.

Objective 4: Deploy wildlife boxes to increase opportunities for nesting and/or roosting species

Measures for improving and/or creating opportunities for other nesting birds will comprise the installation of nest boxes, suitable for a range of species.

It is proposed that cavity-nesting boxes and open-nesting boxes will be installed within the Site and fixed to mature (but not commercial coniferous) trees. Opportunities for roosting bats will also be increased on Site through the installation of bat boxes fixed to appropriate trees (these will be offset from operational turbines).

A bird nest box and bat roost box plan for the Site will be designed by a suitably competent ecologist for incorporation into the NEMP, with the final number, type and location of boxes confirmed in consultation with NatureScot, to be most relevant to the species assemblage present, and local priorities.

Aim 5: Improve the quality and condition of the woodland habitat on Site

Objective 1: Restore condition of AWI

The aim of ancient woodland restoration is to maximise the ecological integrity of the AWI. Ecosystems with greater ecological integrity are richer and more resilient. They are characteristic of their locality and more self-regulating.

Restoration of AWI will be undertaken in agreement with the landowners, NatureScot and DGC. An action plan and programme will be agreed upon with the above listed stakeholders. This will include survey and assessment of remnant features, associated threats and how to prioritise action and ongoing monitoring of the AWI to determine the key site-specific principles to achieve the best restoration outcomes. Some examples of key principles of AWI restoration are listed below (but not limited to):

- restoration thinning;
- thinning for regeneration and complexity;
- vegetative regeneration;
- understorey management; and
- gradual restoration and longer-term retention on non-native trees.

Objective 2: 'Feather' commercial forestry

Edge feathering is the process of re-creating a transitional zone between two different habitat types. It is proposed to 'feather' commercial forestry edges, where appropriate, including areas west in the Site south of Lamgarroch, and north of Blackcraig Hill.

'Feathering' introduces a diverse vertical structure which can provide shelter, cover and can improve opportunities (for example foraging, roosting and nesting) for a variety of wildlife. The precise locations of the 'feathering' (and most appropriate approach) will be the focus of on-Site investigation to ensure the most suitable localities are chosen without compromising other key features, such as any areas of deeper peat and ground-nesting wader habitat (as well as avoiding potentially increased 'edge-effects' on for example ground-nesting waders).

Aim 6: Control of grey squirrel population

Objective 1: Control grey squirrel population

The Site is located on the periphery of the Nith Valley Priority Area for Red Squirrel Conservation (PARC). PARCs are landscapes where grey squirrel control networks are present, and which aim to provide coordinated and sustained protection of the resident red squirrels. The Site also lies within a Scottish Forestry designated priority area for grey squirrel control, which itself has spatial overlap with the PARC.

To support PARC and Scottish Forestry, it is proposed that a monitoring (of red squirrel (*Sciurus vulgaris*)) and/or control (of grey squirrel) programme is established. A collaborative approach to agree on an appropriate programme will result in the protection of red squirrel populations. Measures to control grey squirrel may include (but not limited to):

- live trapping;
- tunnel traps; and
- shooting.

Prescriptive measures will be agreed with PARC and Scottish Forestry.

Steering Group and Review Committee (SGRC)

A SGRC will be established to oversee the effectiveness of the NEMP.

For the first five years of implementation, the SGRC will meet or correspond at least annually.

The following bodies will be invited to form part of the SGRC:

- the Applicant of the Proposed Development;
- the Landowners (or their representatives);
- independent ecologist appointed by the Applicant;
- DGC;
- NatureScot;
- Scottish Environment Protection Agency (SEPA);
- Buglife; and
- Nith District Fishery Board.

Monitoring

Monitoring is proposed as part of the NEMP in operational years 1, 2, 3, 5, 10 and 15 of the Proposed Development. The requirement for additional monitoring after year 15 will be determined by the monitoring results in year 15. Monitoring will consist of checks of the habitat enhancement measures detailed in the NEMP. The Applicant will provide a summary of the NEMP activities and monitoring results to the SGRC each year of monitoring.

A monitoring programme to include compliance checking of the implementation of prescriptive measures along with the monitoring of the effectiveness of such measures will be established and agreed in consultation with NatureScot and DGC. This will allow the success of measures outlined in the NEMP to be determined, and any requirement for remedial measures to be adopted. This will likely include measures to monitor tree planting to ensure any failed stock can be identified and readily replaced, monitoring the status of deadwood and using any stored excess deadwood to 'top-up' where required. The success of the carbon-rich soil enhancement and improvement activities will be monitored (as stated above) for an ongoing period during the operational phase of the Proposed Development. This will also include identifying evidence of deer grazing and whether deer management as undertaken on the Site is appropriate for enhancing biodiversity, or whether changes to the deer control are required (for example, increased culling). Any alterations required to deer management would be discussed with the landowner. The details will be included in the final NEMP to be agreed by a suitable planning condition.

It is proposed that pond monitoring and management will be undertaken, it is anticipated that some work may be required in the first few years to ensure success. The scope of the pond management and monitoring will be agreed within NatureScot, DGC and Buglife.

It is proposed that ornithological monitoring will be undertaken as part of the monitoring programme, including breeding bird surveys. The focus of the survey will be within 1 km of the Proposed Development. The frequency and scope of surveys will be agreed with NatureScot, and the results of the survey will be shared with NatureScot and DGC.

It is proposed that monitoring of the success of AWI restoration will be undertaken, it is anticipated that on-going management will be required within the first few years to ensure measures implemented are contributing to successful restoration.

Appropriate measures for monitoring for red squirrel conservation will be agreed with PARC and Scottish Forestry.

The requirement for any updated baseline surveys to act as 'Year 0' for monitoring purposes will also be identified and undertaken at the appropriate time (such as, within the first year of operation of the Proposed Development and during the main growing/breeding season March to August, inclusive).

The NEMP is intended to remain a live document which will be updated and amended as necessary, based on results of the Site investigation works and monitoring. The SGRC will be kept informed of any proposed changes to the NEMP and their agreement sought as necessary, given the SGRC will oversee the effectiveness of the NEMP.

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