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Agenda Item 31.4

PROPOSAL FOR THE INCLUSION OF THE MAGELLANIC PLOVER *(Pluvianellus socialis)* IN APPENDIX I OF THE CONVENTION*

Summary:

The Government of Chile has submitted the attached proposal for the inclusion of the Magellanic Plover (*Pluvianellus socialis)* in Appendix I of the CMS.

Revision refers to the geographical nomenclature in accordance with the editorial directive (ST/CS/SER.A/42) UN Secretariat, 3 August 1999.

PROPOSAL FOR THE INCLUSION OF THE MAGELLANIC PLOVER *(Pluvianellus socialis)* IN APPENDIX I OF THE CONVENTION

A. PROPOSAL

Inclusion of the Magellanic Plover, *Pluvianellus socialis*, in Appendix I of the Convention on the Conservation of Migratory Species of Wild Animals

B. PROPONENT

Government of Chile, Government of Argentina

C. SUPPORTING STATEMENT

1. Taxon

1.1 Class: Aves
1.2 Order: Charadriiformes
1.3 Family: Pluvianellidae
1.4 Genus or species: (*Pluvianellus socialis*) Gray, 1846
1.5 Scientific synonyms
1.6 Name or common names in all the applicable languages used by the Convention;
English: Magellanic Plover
Spanish: Chorlo de Magallanes (CHILE); Chorlito ceniciento (ARGENTINA)
French: Pluvianelle magellanique

2. Overview

The proposal seeks to include the Magellanic Plover, (*Pluvianellus socialis*), in Appendix I of the Convention on the Conservation of Migratory Species of Wild Animals. The species is already included in Appendix II of the Convention, but its inclusion in Appendix I seeks to encourage, as a matter of urgency, new conservation measures for the species and its habitat and to strengthen binational and multi-institutional cooperation, considering its worrying population size.

The Magellanic Plover is a species restricted to southern South America, where it breeds in southern Chile (Magallanes region) and Argentina (provinces of Tierra del Fuego and Santa Cruz), wintering along the Atlantic coast as far as the Valdes Peninsula in the Province of Chubut, and regularly reaching the Province of Buenos Aires (Argentina). It has appeared as a vagrant (two individuals in 2022) in Uruguay.

The species is currently considered Near Threatened globally, with an estimated population between 1,500 and 7,000 individuals. However, the first population censuses carried out between 2022 and 2023 have suggested a population no greater than 500 individuals. There are multiple threats to this small population, including the loss of habitat and decline in habitat quality, impacts caused by disturbances and predation by introduced species, the potential impact of energy projects, degradation and desertification of the Patagonian steppe due to overgrazing, and climate change. Its global conservation status is currently being re-evaluated, and the species is already considered Endangered at the national level in Chile and Argentina.

3. Migrations

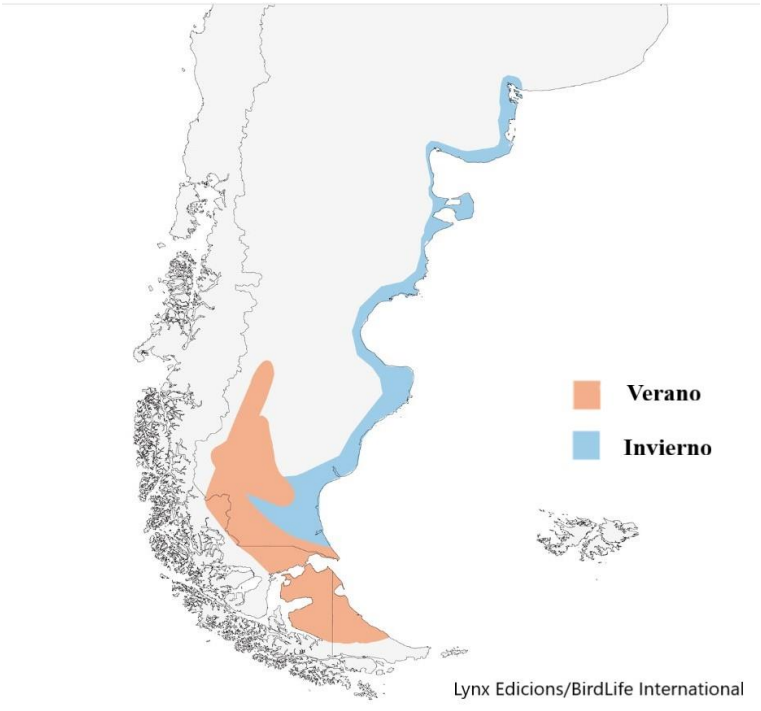
3.1 Kinds of movement, distance, the cyclical and predictable nature of the migration

After the breeding season, populations in Chile and Argentina migrate to the Atlantic coast of Patagonia, where they can be found distributed north to the Valdés Península and occasionally further north towards the province of Buenos Aires (Wiersma and Kirwan 2020). In 2022, two juveniles of the species were recorded for the first time in Uruguay (Castelli *et al* 2022). Individuals generally begin arriving on the breeding grounds in late August or early September and leave in April/May. Towards the end of the breeding season, individuals of the species tend to congregate in flocks at a few sites by Patagonian lagoons or along the coast before migrating to their wintering grounds further north along the Atlantic coast.

3.2 Proportion of the population migrating, and why that is a significant proportion

All or almost all of the Magellanic Plover population migrates to the Atlantic coast outside the breeding season, including juveniles. Small numbers may remain in the breeding areas during the winter (Wiersma and Kirwan 2020).

Map 1: Distribution of the Magellanic Plover



4. Biological data (other than migration)

4.1 Distribution (current and historical)

The Magellanic Plover is restricted to Patagonia,where it breeds in southern Chile (Magallanes region) and Argentina (provinces of Tierra del Fuego and Santa Cruz), wintering along the Atlantic coast as far as the Valdes Peninsula in the Province of Chubut, and regularly reaching the Province of Buenos Aires (Fjeldså y Krabbe 1990, Ferrari *et al*. 2003, Matus 2018). The species occasionally reaches the Province of La Rioja (Sosa 2010) and has arrived as a vagrant in the Falkland Islands (Malvinas[1]) (Woods 2017) and Uruguay (Castelli *et al*. 2022).

1 Nomenclature in accordance with Editorial directive (ST/CS/SER.A/42), UN Secretariat, 3 August 1999

4.2 Population (estimates and trends)

The population size of this species has always been somewhat uncertain due to the lack of exhaustive population studies throughout its distribution area. The fifth edition of Waterbird Population Estimates (Wetlands International 2020) provided an estimate of 1500, citing Ferrari et al. (2008), which based its estimate on Jehl (1975), who suggested "probably fewer than 1,000," and Fjeldså and Krabbe (1990). BirdLife (2022) offers an estimate of 1,500-7,000 individuals, following R. Schlatter (in litt. to BirdLife 2002), who estimated "fewer than 10,000 individuals" without further documentation. A binational effort to estimate the population size of the species during its breeding season (December 2021) and wintering season (May 2022) resulted in a total count of approximately 300 individuals (Imberti and Matus, 2023), suggesting that the species has a meager population size that probably does not exceed 500 individuals. Initial data from the May 2023 wintering census supports a population estimate of no more than 500 individuals (G. Montero in litt. 2023).

4.3 Habitat (short description and trends)

During the breeding season, the Magellanic Plover can be found on the open shores of freshwater or brackish lakes lined with pebbles and mud, mainly of glacial origin, in the steppe of southern Patagonia (Jehl 1975, Wiersma and Kirwan 2020). They generally avoid saline areas near the coast, shallow lagoons that dry quickly during the summer, and water bodies with a lot of vegetation (Jehl 1975).

Outside the breeding season, the species is found on the coast, mainly in sheltered bays, lagoons, and river estuaries, occasionally along rivers (Jehl 1975, Wiersma and Kirwan 2020). Post-reproductive concentrations have been observed at Laguna de los Palos and Bahía Lomas (both in Chile) from April to May (R. Matus in litt. 2023). Concerning altitude, the species has been recorded up to only 300 m in Chile (Jaramillo 2003) but up to at least 1,200 m in southern Argentina (Wiersma and Kirwan 2020).

4.4 Biological characteristics

The Magellanic Plover is a unique species of shorebird. Despite its common name, it is not related to the plovers (Charadriidae) and is found in its own family (Pluvianellidae). Among shorebirds, it is thought to be most closely related to Antarctic pigeons (Chionidae). It has an unimpressive dull coloration, short legs with thick tarsi and well-developed hind toes, and a small, round head (Jehl 1975). Its bill and foraging tactics more closely resemble those of a turnstone (*Arenaria*) than those of a plover, while its appearance may also bear a resemblance to that of a small pigeon (Jehl 1975, Hayman 1986).

The Magellanic Plover pecks at surface food, turns over stones, shells, and debris to find food, and sometimes scratches or digs in the sand for food using its powerful legs, a behavior apparently unique among shorebirds (Jehl 1975). While foraging, the species is highly active and can run fast.

The species can be found breeding around freshwater and brackish lagoons in inland Patagonia. The territories are heavily defended and are generally linear, over 300-500 meters in size (Jehl 1975). Several territories can be found along the shore of the same lake. Lishman and Nol (2012) found up to 14 nesting pairs in one lake; however, there are no specific characteristics that can predict the number of breeding pairs per lake. Studies by Lishman and Nol (2012) indicated low density over an extensive nesting area and low annual fecundity (Lishman 2008) with fluctuations in the number and quality of locations due to increasing desertification and climate change (Ferrari *et al*. 2008, Lishman 2008).

The nests of the Magellanic Plover are located very close to the water on wide clay or pebble shores, without vegetation, on clear or argillaceous lakes with varying water levels. The nests are simple exposed scrapes in the ground lined with stones. They usually lay one or two eggs which are incubated by both the male and female. Multiple clutches may occasionally be attempted up to three times (Ferrari *et al*. 2008), even when the first clutch is successful (Ferrari *et al*. 2008). Both parents care for the chicks, and it is the only shorebird species that actively feeds its young by regurgitating food from its well-developed crop.

4.5 Role of the taxon in its ecosystem

There are no studies in this regard, but their manner of foraging, turning over rocks, and scratching or digging in the sand probably helps to create microenvironments for invertebrates.

As a unique species with a very restricted distribution, it is a highly sought-after species by bird watchers and therefore is a key component of Patagonia's natural capital.

The Magellanic Plover is among the world's five most evolutionarily distinct shorebird species in the EDGE (Evolutionarily Distinct and Globally Endangered) analysis. The EDGE species (https://www.edgeofexistence.org/) have few close relatives on the tree of life and are often highly unusual in their appearance, lifestyle, behavior, and genetic makeup. They represent a unique and irreplaceable part of the world's natural heritage, but an alarming proportion are on the verge of extinction.

5. Conservation status and threats

5.1. IUCN Red List Assessment (if available)

The Magellanes Plover was most recently assessed for the IUCN Red List of Threatened Species in 2016, when it was categorized as Nearly Threatened (NT) under criteria C2a(i); D1. The classification as NT was due to its small population being threatened by the loss and degradation of its breeding and wintering habitat, although there is no evidence of a population decline.

BirdLife International (the Red List authority for birds) is currently undertaking a reassessment of the species' conservation status, considering the results of the recent population censuses, the possibility of significant population decline, and a better understanding of the threats facing the species. It is expected to be re-categorized as Vulnerable (VU) or Endangered (EN) at the global level.

5.2 Equivalent information relevant to conservation status

Argentina

In Argentina, the species has been categorized as Endangered (EN) at the national level (Ministry of Environment and Sustainable Development and Birds Argentina, 2017) due to its small breeding population and the existing evidence of a decline in the quality of breeding habitat, as it is almost entirely devoted to cattle farming and water bodies are used as watering holes. For the national analysis (conducted in 2015), it was assumed that the breeding population in Argentina could be small, with fewer than 2,500 mature individuals and a continuous decline (C2a(i)b) applicable for the category Endangered.

Based on different assumptions, Lishman (2008) projected a scenario in which the population could be close to extinction in less than 30 years, at a rate of 20% per year, based on survival estimates and other demographic measures, which he obtained from his study in the province of Santa Cruz (assuming a population of 1,000 individuals, according to Jehl (1975) and a finite population growth rate with a value of $\lambda = 0.8$). However, he believes that there are several aspects of the estimation of λ that are questionable, although data to improve the

confidence of this value were lacking up to that point.

Chile

According to Decree 16/2020 of the Ministry of Environment, the Magellanic Plover is considered Endangered (EN) C2a(i) given its small population (fewer than 2,500 mature individuals), a continued decline estimated from habitat destruction due to the drying up of lagoons and the fact that no sub-population is estimated to consist of more than 250 mature individuals. This analysis was conducted using the global Lisa Roja criteria applied at the national level. The evaluation committee emphasized that the Argentine population is in the same condition as that of Chile, its populations face the same threats, and the conservation category assigned by the Argentine state is Endangered.

5.3 Threats to the population (factors, intensity)

The direct threats to the population include the trampling of nests by livestock, disturbance by dogs, and the use of off-road vehicles on the shores of Patagonian lagoons (Ferrari *et al*. 2003, 2008; Lishman, 2008).

Indirect anthropogenic effects include degradation and desertification of the Patagonian steppe due to overgrazing and climate change, factors that may influence the stability of the semi-arid ecosystem and the chemistry of the lagoons that the species uses as a nesting habitat (Lishman 2008). The decreases in annual rainfall attributed to climate change may negatively affect the annual reproductive output of this species (Lishman 2008). In addition, there is a decrease in the quality of wintering habitat in the main area identified so far (Gallegos and Chico River estuary), where an increase in the number of people in the surrounding city (Rio Gallegos), potential contamination by urban effluent disposal, and the increase in the number of dogs in sensitive areas have been detected (Ferrari *et al*. 2008, Garzón and Ferrari 2014).

The Patagonian inland lagoons are temporary or semi-permanent wetlands whose flooding dynamics are determined by seasonal rainfall and snowmelt (Deil et al. 2011). They are generated by the undulating topography of the steppe, which leads to depressions that are flooded with fresh water. They are located in the landscape of the Argentine and Chilean steppe. These ecosystems are currently undergoing drastic changes in their water systems and experiencing droughts, which could affect the life cycle of the species in the short term. Proof of this is that during January 2023 and via Exempt Resolution No. 12, the Chilean Minister of Agriculture declared: The "agricultural emergency situation" is due to the water deficit experienced by the Region of Magallanes and the Chilean Antarctic. A similar situation is being observed in Argentina, particularly in Santa Cruz, where according to the 2019 National Agro and Climate Change Plan, an emergency has been declared throughout the territory at least once between 2004 and 2017, with a maximum of six times in the Deseado Department. This scenario is currently repeated, reflected in Resolution No. 066 of February this year, which declares a State of Emergency or Agricultural Disaster Zone throughout the provincial territory (Presidency of the Provincial Agrarian Council, declared ad-referendum of this Executive Branch).

5.4 Threats connected especially with migration

Patagonia has attracted the interest of companies seeking to generate e-fuels and ammonia using renewable energy, particularly green hydrogen. Hydrogen fuel does not produce carbon when burned, but it requires a lot of energy to generate it, and the powerful Patagonian winds could provide that energy. Multiple companies are investing in the construction of large-scale wind farms, hydrogen generation plants, and transportation technologies to produce Green Hydrogen in the southern tip of South America.

In a study conducted by the Chilean Ministry of Energy in 2021 to identify and quantify the wind potential for the development of green hydrogen in the Magallanes and Antarctic Region of Chile, it was estimated that 13% of the world's H2v could be produced with wind energy, reaching a potential of 126 GW. In territorial terms, developing this potential would imply implementing an estimated 13,000 km^2 of wind turbines, which could cause significant interference to the local movements and migratory routes of this species, hindering flight patterns and particularly affecting reproduction, feeding, and resting.

Changes in the landscape of the Magellanic steppe and inland Patagonian lagoon environments resulting from the installation of extensive wind farms for green hydrogen production could severely affect the life cycle of the Magellanic Plover and other species such as the Red Knot (*Calidris canutus rufa*), and the Ruddy-headed Goose (*Chloephaga rubidiceps*), both migratory species listed in Appendix I.

5.5 National and international utilization

The Magellanic Plover is not used as a resource. It is only a species of interest for science and research and the avitourism market, attracting tourists who wish to observe the species.

6. Protection status and species management

6.1 National protection status

Chile

In Chile, the species is categorized as Endangered (Regulation for the Classification of Wild Species of the Ministry of Environment), according to the latest assessment carried out in 2019.

Law No. 19,473 and its Regulations (Supreme Decree No. 5 of 1998 and its amendments) prohibit the hunting and capture of the species throughout the national territory.

Argentina

In Argentina, the species is considered Endangered (Ministry of Environment and Sustainable Development and Birds, Argentina 2017)

The Magellanic Plover is considered a Provincial Natural Monument in Santa Cruz Province, enacted by Law No. 086 by the Honorable Chamber of Deputies of Santa Cruz in June 2014. Provincial Law No. 3373, of June 12, 2014, states, "Any activity to be undertaken within the habitat of the species mentioned in the previous article, which implies any modification of the same, must have the prior authorization of the Application Authority. Article 3.- The Provincial Agrarian Council shall create a program for the protection and monitoring of this species and for awareness-raising among neighboring communities within the distribution area of the Cenicienta Plover in the province of Santa Cruz.

In 2010, the Provincial Law for the Conservation of Migratory Shorebirds No. 3163 and their habitats was approved, with the following objectives:

- Ensure the functionality and diversity of those environments that represent sites of importance for conserving migratory shorebirds within the provincial territory;
- Conserve the values, functions, and environmental services of the wetlands and areas of influence (water supply, aquifer recharge, protection against coastal and soil erosion, retention of toxic substances, retention and generation of nutrients, and others);

- Generate public dissemination actions to contribute towards protecting the environment by generating awareness and a sense of identity with the local environment

The law prohibits the modification of wetlands that represent important sites for the conservation of migratory shorebirds throughout the Province of Santa Cruz, except those works or tasks that are part of conservation projects and/or management plans for protected areas.

6.2 International protection status

The Magellanic Plover is listed in CMS Appendix II (originally included as part of the Scolopacidae family).

6.3 Management measures

Chile

In January 2022, the Chilean Ministry of Environment officially announced, through Exempt Resolution No. 50 of January 19, 2022, the National Strategy for the Conservation of Birds (ENCA) 2021-2030, an initiative that seeks to generate conditions for the effective conservation of Chile's native birds by mitigating and reducing threats.

Shorebirds are a sub-object of conservation in the ENCA. Hence, the Ministry of Environment, together with Manomet Inc. and the Chilean Bird and Wildlife Watchers Network, facilitated a process between 2021 and 2023 to develop the first "Action Plan for the Conservation of Shorebirds in Chile" with the participation of academics, researchers, non-governmental organizations, municipalities and other public institutions related to the conservation of these birds and their habitats in Chile. The Magellanic Plover is included in the list of focal species of the Chilean Plan. The Ministry of the Environment is expected to issue a resolution formalizing the document for its implementation during the second half of 2023.

The Plan identifies twelve major threats to shorebirds in Chile and prioritizes ten conservation targets to reduce or mitigate them, describing actions and goals along five strategic lines: 1) Strengthen governance and mechanisms for conservation; 2) Empower and engage the community and stakeholders; 3) Promote research and monitoring; 4) Protect and manage sites; 5) Encourage good practices in environmental impact assessment and productive activities.

Argentina

The "National Plan for the Conservation of Shorebirds in Argentina" was developed in 2019 through a participatory process involving more than fifty participants from 30 governmental, scientific, and civil society organizations. This process was carried out jointly by the Ministry of Environment and Sustainable Development, Manomet/WHSRN, Aves Argentinas, and Wetlands International. This Plan was approved by the Ministry of Environment and Sustainable Development through Resolution 409/2020, approved on November 12, 2020, and published in the National Gazette on November 16, 2020. The Magellanic Plover is one of the focal species of the national plan.

The National Plan for the Conservation of Shorebirds in Argentina defines five strategic objectives: i) Increase and incorporate knowledge about shorebirds and their socio-ecological systems as input for management. ii) Conserve important sites for shorebird populations iii) Promote the implementation of good practices in developing productive and recreational activities. iv) Strengthen management and good governance, and v) Generate appreciation and changes in attitudes about the importance of shorebirds and the conservation of their

environments.

Binational

Binational actions have been developed, such as the "*Pluvianellus* Project," which began in 2021, implemented by the Centro de Rehabilitación de Aves Leñadura (CRAL), in Punta Arenas, Chile, and the Asociación Ambiente Sur in Argentina. This initiative has governmental support in both countries, at the provincial level in Argentina and the regional level in Chile. It also has the international support of Manomet Inc., the International Conservation Fund of Canada, and Neotropical Birding and Conservation-NBC. Conservation, research, and awareness-raising activities are underway within this framework. Conservation actions include the registration and reduction of threats through the presence of guards and the protection of nests, and research actions include population monitoring through direct observation and the use of satellite devices. Finally, awareness-raising activities include the development of marketing strategies, communication campaigns, and dialogue roundtables.

6.4 Habitat conservation

Chile

In Chile, most of the lagoons that serve as habitat during the species' breeding season are located on private cattle ranches, both in the continental sector (the communes of Laguna Blanca, Rio Verde, and San Gregorio) and Tierra del Fuego (the communes of Cerro Primavera and Porvenir).

The sites where the Magellanic Plover is present that have some form of protection are the following: Laguna de los Cisnes (Natural Monument), Bahía Lomas (Nature Sanctuary) both in Tierra del Fuego. In the commune of Río Verde (continental sector), there are at least two lagoons on the Entrevientos ranch (belonging to the Ministry of National Assets and under the administration of the Chilean Army); however, because it is a military training camp, it does not have any protection. Regardless of being located on private land, the bodies of water are considered Public Use Assets; however, not all have the levels of access that would allow monitoring. The number of sites with Magellanic Plover that have some form of protection in Chile is low and probably represents less than 1% of the total area.

Argentina

As is the case in Chile, most of the lagoons that serve as habitats during the reproductive period of this species are located on private cattle ranches

Currently, the Gallegos and Chico River estuary has different levels of protection and recognition at the national and international level:

<u>Urban Coastal Reserve</u>

On September 16, 2004, the city of Río Gallegos (Santa Cruz) declared its first municipal protected area, called the Urban Coastal Reserve (UCR), which was established by Ordinance of the HDC (Honorable Deliberating Council) promulgated under number 5356/04 and regulated by Decree No. 3478/06 of the Municipal Executive Branch. The creation of the UCR was prompted by the results of studies carried out in the coastal area of the city, which identified its high biological value (mainly because it is the habitat of thousands of migratory shorebirds and the Ruddy-headed Goose) and the existence of sectors that were severely degraded by the expansion of the city on the coast, making it necessary to protect the critical areas that still maintained signs of their natural wealth (Management Plan for the Río Gallegos Urban Coastal Reserve, 2011).

<u>Provincial Migratory Bird Reserve (RPAM)</u>

This was created on June 28, 2001, by Law No. 2583/01 of the Honorable Chamber of Deputies of Santa Cruz, following the legal framework established by Law No. 786, on fiscal lands in the coastal sector between 51° 37'S-69" 01'W and 51° 41'S-69" 09'W; and enacted by Regulatory Decree No. 1520/01 of the Provincial Executive Power. It covered an approximate area of 2,300 ha. This protected area, together with the Río Gallegos Urban Coastal Reserve, forms part of the Gallegos River estuary ecosystem, and together they cover approximately 4,300 hectares. It stands out as the habitat of thousands of migratory shorebirds, both Nearctic and neotropical, including the Magellanic Plover, *Pluvianellus socialis.*

Work is currently being carried out jointly by the government and local and regional organizations to establish comprehensive protection for the Calafate Wetland (El Calafate, Province of Santa Cruz, Argentina), where 70 hectares will be protected, including the Laguna Nimez Municipal Reserve, the Calafate stream, and the Bahía Redonda of Lake Argentino. This important wetland is the nesting site of the Magellanic Plover and protects a system of connected bodies of water, sheltering a large amount of local flora and fauna.

International recognition

In October 2005, the Gallegos River estuary, including the Provincial Migratory Shorebird Reserve and the Río Gallegos Urban Coastal Reserve, was declared a Site of International Importance according to the criteria of the Western Hemisphere Shorebird Reserve Network (WHSRN), thus giving the estuary worldwide recognition (Ferrari *et al.* 2008*)*. The categorization given to the estuary was based primarily on it being home to more than 10% of the world's population of the Magellanic Plover (www.whsrn.org).

Other sites of importance to the Magellanic Plover have also been designated as part of WHSRN, including Bahía Lomas (site of hemispheric importance) and Valdés Peninsula (site of regional importance). Several important sites for the species have been designated as IBCAs (Important Bird Conservation Areas) by Birdlife International (2023).

6.5 Population monitoring

The main population monitoring effort is being carried out through the "*Pluvianellus* Project" led by the Centro de Rehabilitación de Aves Leñadura (CRAL), Asociación Ambiente Sur, and Manomet, Inc. with government support in both countries, at the provincial level in Argentina and regional level in Chile. So far, two binational population censuses have been conducted during the winter (2022 and 2023) and one during the breeding season (2022-23). Local movement and migratory movements of four individuals are also being monitored using satellite transmitters (plans to follow other individuals were halted due to the avian influenza health situation in both countries).

At the site level, the nesting population is monitored at the Los Palos Lagoon in Chile and the winter population in the Gallegos River estuary, Argentina.

7 Effects of the proposed amendment

7.1 Anticipated benefits of the amendment

The incorporation of the Magellanic Plover in Appendix I of the CMS is intended to encourage binational collaboration between Chile and Argentina, including:

- The creation of a binational coalition for the conservation of the species (between ministries, regional governments, municipalities, NGOs, specialists, universities and research centers, communities, and the private sector);
- The creation of an international scientific working group to research the species;

- Creation and implementation of a binational recovery plan for the species;
- Creation of guidelines to evaluate the environmental impact of energy projects on those areas of influence with respect the critical habitats for the species;
- Design and implementation of a binational monitoring program/system;
- Declaration and management of new protected areas that allow the management of critical habitats;
- Establishment of other forms of public-private administration and management aimed at protecting habitats and critical sites of importance for the species;
- Creation and protection of a binational migratory corridor for the species.

7.2 Potential risks of the amendment

None

7.3 Intention of the proponent concerning development of an Agreement or Concerted Action

8. Range states

CHILE; ARGENTINA; (URUGUAY)

9. Consultations

The Chilean Ministry of Foreign Affairs has consulted with third countries in the region, who have expressed interest in supporting this proposal, which, for logistical reasons, could be formalized after the deadline.

10. Additional remarks

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