

# **Plan Change 3 to the Waitaki Catchment Water Allocation Regional Plan**

## **Officer's Reply to Minute 9 – hydro-electricity generation activity status**

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## Part 1 – Legal submissions<sup>1</sup>

### *Introduction*

1. In its Minute 9 dated 21 September 2015, the Hearings Panel directed the Canterbury Regional Council (the "Council") to file any report it wished to make on the subject of a controlled activity regime in respect of the taking and use of water for hydro-electricity generation and regionally significant infrastructure by Friday 16 October 2015.
2. This Report comprises:
  - a. Brief legal submissions in response to matters raised in the submissions lodged on behalf of the parties in support and in opposition to a controlled activity regime; and
  - b. A planning assessment by Mr Regnault.

### *High Court decision on controlled activity status*

3. As set out in the decision of the High Court, there is no legal impediment to a controlled activity regime in respect of the taking and use of water for hydro-electricity generation.<sup>2</sup> Accordingly, it is submitted that the activity status for the replacement of hydro-generation consents, must be assessed on its merits, in accordance with the provisions of the RMA.
4. As set out in Mr Regnault's part of this Report, he considers that controlled activity status is appropriate for those rivers where an environmental flow and level regime has been set in the Plan. However, Mr Regnault considers that where an environmental flow and level regime has not been set (being the Pūkaki River, the Lower Ōhau River and the Tekapo River (above the confluence with the Forks Stream)), restricted discretionary activity status is the most appropriate activity status for the replacement of consents for hydro-electricity generation activities.

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<sup>1</sup> This section has been prepared by Philip Maw.

<sup>2</sup> *Rangitata Diversion Race Management Limited v Canterbury Regional Council* [2015] NZHC 2174.

### *Controlled activity – consent conditions*

5. If an activity is classified as a controlled activity, a resource consent is required and must be granted by the consent authority.<sup>3</sup> The consent authority's power to impose conditions on the consent is restricted to the matters over which control is reserved in the plan.<sup>4</sup>
6. In general, a condition of consent cannot be imposed that would negate the grant of the consent.<sup>5</sup> It is submitted that it is a matter of “fact and degree” as to whether a condition imposed would be of such a nature and effect so as to negate the specific benefit for which a consent is to be granted.<sup>6</sup>
7. In respect of the Pūkaki River, the Lower Ōhau River and the Tekapo River (above the confluence with the Forks Stream), it is submitted that conditions relating to environmental flow and level regimes may be of such a nature and effect so as to negate the grant of consent. For example, a flow that is considered appropriate for one of the rivers may restrict hydro-electricity generation activities in that river. If this activity, as proposed by Meridian or Genesis, was classified as a controlled activity, there would be no discretion to decline the consent application. It is submitted that it is arguable that such conditions could not be imposed if the activity was classified as a controlled activity, because to do so would negate the grant of consent.
8. For those rivers, it is submitted (as recommended by Mr Regnault) that restricted discretionary activity status is more appropriate as it would enable conditions to be imposed, or a consent application to be declined.

### *Scope to impose controlled activity status*

9. Counsel for the Lower Waitaki River Management Society submits that the imposition of a controlled activity regime must be done pursuant to a future publicly notified plan change.<sup>7</sup>

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<sup>3</sup> Subject to section 106 of the RMA, section 55 of the Marine and Coastal Area (Takutai Moana) Act 2011, and the provisions of sufficient information to determine that the activity is a controlled activity.

<sup>4</sup> Sections 87A and 104A of the RMA.

<sup>5</sup> *Lyttelton Port Co Ltd v Canterbury Regional Council* EnvC C008/01; *Ravensdown Growing Media Limited v Southland Regional Council* EnvC C194/2000, 5 December 2000; *Taranaki Regional Council v Willan* EnvC W150/96, 23 October 1996.

<sup>6</sup> *S & M Property Holdings Ltd v Wellington City Council* [2003] NZRMA 193 (HC).

<sup>7</sup> Legal submissions of Counsel for the Lower Waitaki River Management Society opposing controlled activity status for hydroelectricity and other major infrastructure at [33]-[34].

10. If the Panel considers that controlled activity status is the most appropriate, it is submitted that there is scope to impose a controlled activity regime in PC3.
11. PC3, as notified, signalled a change to the planning framework in respect of consent applications for the replacement of hydro-electricity generation activities. Proposed Rule 15A as notified sought that such consent applications be assessed as restricted discretionary activities. The availability of controlled activity status was also considered in the section 32 Report, which was made available at the time of the notification of PC3.<sup>8</sup> Any persons (subject to the trade competition provisions in the Act) were entitled to lodge a submission on proposed Rule 15A. Meridian Energy Limited and Genesis Energy Limited each lodged a submission seeking that Rule 15A be amended to provide for controlled activity status for the replacement of existing hydro-generation consents.<sup>9</sup> Persons were also given the opportunity to lodge further submissions in respect of Meridian and Genesis's submissions.
12. PC3, including proposed Rule 15A has been subject to the public hearing process set out in Schedule 1 of the RMA, which allows for public participation. There is scope in submissions for the Panel to consider controlled activity status in respect of Rule 15A. Therefore, it is submitted that imposition of a controlled activity regime is open to the Panel.

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<sup>8</sup> Section 32 Report at page 12.

<sup>9</sup> Submission points 3480 and 3228.

## Part 2 – Evaluation<sup>10</sup>

### *Introduction*

13. This evaluation has been prepared in response to Minute 9 of the Hearings Panel for Plan Change 3 to the Waitaki Catchment Water Allocation Regional Plan (the ‘Plan’). I have read the legal submissions made by those parties supporting controlled activity status<sup>11</sup> and parties opposing it.<sup>12</sup> I also recognise that as a result of the recent High Court decision, controlled activity status is legally available to the Council for the replacement of existing hydro-electricity generation consent applications, depending on the merits.
14. My previous evaluation of the appropriateness of controlled activity status for the replacement of existing hydro-electricity generation consents, undertaken before the Hearing, remains unchanged.<sup>13</sup> In summary, my position is that controlled activity status is more effective and efficient than restricted discretionary activity status for those rivers that have an environmental flow and level regime established in the Plan. However, in the Pūkaki river, the Lower Ōhau river, and the Tekapo river (above the confluence with Forks Stream), where the Plan has not established an environmental flow and level regime, I consider that restricted discretionary activity status is the most appropriate. On that basis, I recommend a split rule, with controlled activity status for the replacement of existing hydro-electricity generation consents, but with restricted discretionary activity status applying in respect of the Pūkaki river, the Lower Ōhau river, and the Tekapo river (above the confluence with Forks Stream). I have reconsidered my previously proposed drafting of such a rule, and set out recommended amended wording later in this Report.
15. Whilst I rely on my previous evaluation, in this Report I provide a further response in light of the issues raised by submitters. I comment on the draft wording for Rule 15A suggested by Meridian (the *draft rule*) and make recommendations on how I consider the drafting could be improved. I have also considered the context of the rule within the Plan.

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<sup>10</sup> This section has been prepared by Nick Regnault.

<sup>11</sup> Genesis Energy Ltd (Genesis), Meridian Energy Ltd (Meridian), and Waitaki Irrigators Collective.

<sup>12</sup> Ngāi Tahu, Lower Waitaki River Management Society (the ‘Society’), Mackenzie District Council, Alison MacTavish.

<sup>13</sup> Response to Questions of Hearing Commissioners on Expert Evidence & Council Reports, 27 May 2015, at pages 12-15.

16. The draft rule suggested by Meridian, and supported by Genesis is set out below:<sup>14</sup>

*Any activity that complies with Rules 2, 3, 6 and 7 and is the subject of an existing consent to take, dam, divert or use of water necessary for hydro-electricity generation:*

- *for the continued availability of water for hydro electricity generation output from the Waitaki Power Scheme, or*
- *to protect the assets of the Waitaki Power Scheme directly associated with hydro electricity generation output, including canals, dams and powerhouses*

*is a ~~restricted discretionary~~ controlled activity. ~~The exercise of discretion is restricted to~~*

**Control is reserved over the following matters:**

1. *In respect of flows into the Pūkaki River, the Lower Ōhau River or the Tekapo River (above the confluence with the Forks Stream), adverse effects, including effects on Ngāi Tahu culture, traditions, customary uses and relationships with land and water, unless the environmental flow and level regimes for these rivers have been reviewed after the public notification date of this rule and the outcome of the review has been made operative in accordance with the relevant provisions of the Resource Management Act;*
2. *Any mitigation measures to address adverse effects (including effects on Ngāi Tahu culture, traditions, customary uses and relationships with land and water), except for changes or alterations to environmental flow and level regimes, minimum lake levels, annual allocation to activities, or the provisions of flows into the Lower Waitaki River, set by this Plan;*
3. *Collection, recording, monitoring and provision of information concerning the exercise of consent; and,*
4. *Lapse period, duration of consent and review requirements.*

*Any application made under Rule 15A will be publicly notified.*

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<sup>14</sup> The words that are double underlined or ~~struck through~~ denote the differences from the rule as notified. Single underlining identifies words or phrases that are defined in the Plan.

17. In my opinion, the draft rule suggested by Meridian is not sufficiently clear as to achieve the certainty required of a rule. A lack of certainty in drafting will create difficulties in implementation. The draft rule also differs in its extent from that notified, and it is that matter I address first.

#### *Extent of the Rule*

18. The draft rule suggested by Meridian is more constrained in its application than the notified rule, in that it limits itself to the *Waitaki Power Scheme* only. Replacement of any consents that are not part of the Scheme would not be covered by the draft rule. I am aware of one example; a consent held by Clarkesfield Holdings Ltd for hydro-electricity generation.<sup>15</sup> This consent would not be captured by the draft rule, and would fall to be considered as either discretionary or non-complying on replacement.<sup>16</sup>
19. Notwithstanding the general principle that it is undesirable to treat the same activities differently in a Plan, it is reasonable to do so in this case because of the contribution that the Waitaki Power Scheme makes to New Zealand's electricity system.<sup>17</sup> In addition I note that the Zone Committee Implementation Programme refers to the national and regional importance of the Waitaki hydro-electricity scheme.<sup>18</sup> The word *scheme* implies generation from the Waitaki Power Scheme rather than the activity of hydro-electricity generation generally. I support constraining the extent of the rule to the Waitaki Power Scheme, but because of the inherent uncertainty associated with this phrase, which I discuss below, I prefer that the rule refer to a Schedule of the relevant consents. I have recommended appropriate drafting below.

#### *Lack of drafting clarity*

20. There is an ambiguity in the use of the word *necessary* in the draft rule. *Necessary* could be read to mean that the activities covered by the existing consent are necessary to the purposes stated, or it could mean that the scale of the activity that is granted by the existing consent is necessary to the purposes stated. The latter interpretation poses difficulties for clause 1 to the notified rule if it enables applicants

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<sup>15</sup> CRC050566 (Clarkesfield Holdings Ltd). Consent was granted in 2011 and expires in 2045. Currently recorded in the CRC Consent database as inactive with a lapse date May 2020.

<sup>16</sup> Rules 15 and 16.

<sup>17</sup> Policy 12(d) recognises the importance of Lakes Tekapo, Pūkaki, Ōhau, Ruataniwha, Benmore, Aviemore and Waitaki and their associated infrastructure.

<sup>18</sup> Lower Waitaki South Coastal Zone Implementation Programme, page 15.

to argue that the scale of the activity cannot be reduced in a replacement consent. Clause 1 to the rule (as notified) contemplates flow releases in the listed rivers<sup>19</sup> as a way of addressing adverse effects.

21. Further, if *necessary* is taken to refer to the scale of the consented activity, it could be inferred that hydro-electricity generation activity is more important than other relevant matters that should be considered in an application for consent. By way of illustration, the iconic nature of Lakes Tekapo, Pūkaki and Ōhau,<sup>20</sup> and the role of flows in Tekapo, Pūkaki and Ōhau rivers<sup>21</sup> are two important matters that must be considered in making a decision on an application and it is inappropriate for the rule to emphasise the weighting of one matter over others. It is the role of policy to provide guidance as to appropriate weighting when consent applications are considered.
22. Nor is the draft rule clear about the activities that form part of the *Waitaki Power Scheme*. Nothing in the suggested drafting, nor elsewhere in the Plan provides a definition or description of the *Waitaki Power Scheme* that gives certainty about the activities that are, or are not, included in the draft rule. Nor has Meridian or Genesis suggested defining the *Waitaki Power Scheme* as a way of providing clarity to their draft rule. A definition, if there is submission scope for one to be included, would need to provide the certainty required by a rule, and be able to accommodate changes to the Scheme itself as assets are added or decommissioned. A clear and unambiguous rule should be able to be interpreted on the drafting of the rule itself.
23. The lack of clarity about what constitutes the *Waitaki Power Scheme* also results in uncertainty in the second bullet point of the draft rule about which assets are directly associated with generation output. The examples of a canal, dam and powerhouse are given in the draft rule, but use of the preceding term *including*, implies this is not an exhaustive list. Other unlisted assets may also be considered to be directly associated with the Scheme.
24. The inclusion of a powerhouse as an asset directly associated with hydro-electricity generation is certain. What is less certain is why a canal has been included, but not other parts of the Scheme that convey water. For example, the Tekapo river between the Tekapo Dam and Lake George Scott conveys water to a canal. Why is

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<sup>19</sup> Subject to the proviso that no environmental flow regime for the listed rivers has been introduced to the Plan after the rule is made operative.

<sup>20</sup> Policy 12(c) of the Plan.

<sup>21</sup> Policies 38 and 39.

the canal directly associated with hydro-electricity generation but the length of the Tekapo river between the dam and the canal is not? Perhaps the delineation is intended to be one of construction, whereby assets are constructed. That could explain why a canal is included and a modified watercourse is not. But this raises a difficulty about an artificial lake such as Lake Ruataniwha which has come about through construction of the Scheme. Should it be considered an asset? The intended extent of the draft rule is not clear.

25. In their submissions, Meridian and Genesis consider Rule 15A should address only *core*<sup>22</sup> s14 RMA consents. They have listed *Generation* and *Safety* related consents to be core but not *Mitigation* or *Operation* related. This may result in debate at consenting stage about this categorisation, particularly as the categorisation provided in these submissions will have no bearing on the interpretation of the draft rule. By way of illustration, *Mitigation* consents could be considered to meet the terms of Rule 15A as they may be argued by applicants as necessary to give effect to conditions imposed on a *Generation* or *Safety* consent.
26. Rule 15A must clearly identify the replacement consents that are subject of the rule and those that are not. The most certain way is to include a list of the replacement consents, similar to that proposed in Rule 2(4). The alternative is to draft an unambiguous rule, but the difficulty in determining what the rule is intended to cover will mean any rule that does not list the consents could be open to further unintended interpretations.
27. Meridian and Genesis oppose the inclusion of a list of consents on the basis that additional consents that should fall under Rule 15A may be obtained in the future and promulgating a plan change to include them would be unduly onerous. Circumstances in which additional consents could be required are:
  - a. the replacement of consents that are on the list, leading to a different consent number to that listed;
  - b. changes to listed consents such as a change of ownership or change to a condition;
  - c. consents for new assets as yet unconsented (and their subsequent replacement);
  - d. consents for activities associated with the Waitaki Power Scheme that have not as yet been identified as needing consent;

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<sup>22</sup> Refer Meridian submission, paragraph 5; Genesis submission, paragraph 8.

- e. consents that arise through a change to the planning regime.
28. Replacement consents for hydro-electricity generation are likely to have a duration that exceeds the ten year life of a plan. Consequently, the list can be updated through a plan review. There is also the opportunity for private or Council initiated plan changes, although this would be onerous if the only purpose of the change was to update the list.
29. Changes to listed consents that occur between plan reviews can be addressed through use of similar wording to that proposed in Schedule 3. This provides for derivatives of listed consents; a derivative being *any consent that arises as a consequence of changes to a consent listed in the Schedule*. I have proposed wording that I consider is appropriate.
30. Rule 15A is not intended to cover hydro-electricity generation assets that are not currently consented. Should any new projects (for example, another power station) be granted consent after the rule becomes operative, the consent granted would not be listed in the Schedule. However I don't consider this to be an impediment to inclusion of a list in the Plan, because a consent for new hydro-electricity generation would likely be of sufficient duration to span at least one review of the Plan, during which there is the opportunity to add new consents to the list.
31. The fourth circumstance of additional consents for existing activities (i.e. activities that need consent, but the consent has not been obtained) seems to me to be very unlikely. Generation activities in the Waitaki catchment have been in existence for decades. It is difficult to see that there could be *key operating* activities or *core s14* activities that are not already consented under the current planning regime.
32. Finally, should there be a change to the planning regime introducing additional consenting requirements, then as noted above, any new consents obtained are likely to be of a duration that would be longer than the next review of the Plan so there would be opportunity to update the list before the consents need to be replaced.
33. Addressing the concern of the Panel that the rule should be limited in its application can be achieved through listing the relevant consents. Listing the consents that are covered by Rule 15A provides the certainty required of a rule while enabling a simple rule construction. Inclusion of the drafting about derivatives in the Schedule provides for changes in consent numbers during the life of the Plan without need to amend the Plan.

34. There remains the question of the activities that should be included in the list. In their submissions, Meridian and Genesis propose that *Generation* and *Safety* consents are the key operating consents that should be included. These consents cover the use of water for generation, taking or diverting of water into canals, diversion of the natural flows of rivers away from canals, and damming of water. Collectively these total 40 consents.<sup>23</sup>
35. The National Policy Statement for Renewable Electricity Generation 2011 (NPSREG) defines *renewable electricity generation* as *generation of electricity from solar, wind, hydro-electricity, geothermal, biomass, tidal, wave, or ocean current energy sources*. Rule 15A addresses taking, damming, diverting and use of water for hydro-electricity generation. A literal application of that definition to the phrase hydro-electricity generation in the rule would be to restrict the rule to the generation activity only. There are 9 consents that are for generation activity.<sup>24</sup>
36. However Policy Ba of the NPSREG refers also to maintenance of generation output:  
*"Maintenance of the generation output of existing renewable electricity generation activities can require protection of the assets, operational capacity and continued availability of the renewable energy resource."*
37. The phrase *maintenance of generation output* supports inclusion of activities that supply water to the powerhouse. An example is the taking or diverting of water into canals as canals convey water to the power stations. Similarly the function of dams is to store water so that generation output can be maintained when demand requires it. For this reason, consents that provide for taking or diverting of water into canals, and damming of water should be included in the Schedule.
38. Diversion of natural flows away from canals is not a generation activity. Meridian and Genesis suggest this activity has the purpose of protecting the canals. Policy Ba does not specify the assets to be protected, nor the things from which they require protection. There is no definition of assets provided in the NPSREG. However, as the canals are part of maintaining generation output, I consider that it is appropriate to include consents that divert natural flows away from the canals as this activity protects an asset needed for the maintenance of generation output. Therefore, I consider that the consents related to the taking of water into canals, or diverting of water into, or away from canals should be included in the Schedule.

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<sup>23</sup> Meridian has 22 consents and Genesis has 18.

<sup>24</sup> Meridian (CRC905333.1, CRC905339.1, CRC905340.1, CRC905345.1, CRC905352.1, CRC905361.3), Genesis (CRC905302.3, CRC905305.2, CRC905319.2).

## Other matters

39. I have considered further whether the proposed rule appropriately implements Plan Policy, in light of the submissions by Genesis<sup>25</sup> and Mackenzie District Council.<sup>26</sup> I understand the legal position to be that for a restricted discretionary activity, Council may only consider policy and Part 2 matters that are relevant to the matters over which discretion is reserved. If the Panel confirms there should be a single rule with restricted discretionary activity status, then in my view the notified rule does not provide for consideration of the positive effects and benefits of hydro-electricity generation, which I consider is necessary in order to implement the Plan.<sup>27</sup> This can be rectified by adding *positive effects* as a matter of consideration.<sup>28</sup> I recommend that this is added to any restricted discretionary rule, but not to a rule specifying controlled activity, on the basis that a controlled activity recognises that positive effects will have been considered in the setting of the environmental flow and level regime (and the classification of the rule as controlled). The proposed restricted discretionary activity rule contemplates a situation where the environmental flow and level regime has not been settled and it is in this situation that effects of the activity (to the extent that discretion has been reserved) must be considered. If the Panel decide that controlled activity status is appropriate, I consider that referring to positive effects in the rule is unnecessary because the matters to be considered go to the conditions to be imposed, rather than the merits of the activity proceeding.
40. The Society has identified that *PC3 and now proposed controlled activity status reflect an ongoing side-lining of Waitaha*.<sup>29</sup> I have considered whether Rule 15A should refer to tangata whenua rather than Ngāi Tahu, however the Plan has a definition of *Ngāi Tahu* that includes Waitaha as one of the hapu that comprises Ngāi Tahu. While I understand that does not accord with Waitaha's understanding of itself in relation to Ngāi Tahu, the drafting of Rule 15A provides for consideration of the interests of all hapu, including Waitaha.

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<sup>25</sup> Genesis submission point 3229 in the Summary of Decisions Requested Report.

<sup>26</sup> Submissions of Counsel for MacKenzie District Council on Controlled Activity Status, dated 9 October 2015, paragraphs 7 – 13.

<sup>27</sup> Refer Objective 3, Policies 11, 12(d).

<sup>28</sup> See submission on notified Rule 15A by Meridian seeking that (inter alia) the benefits of the continued operation of the Waitaki Power Scheme be recognised (53960).

<sup>29</sup> Submissions of Counsel for the Lower Waitaki River Management Society Opposing Controlled Activity Status for Hydroelectricity and Other Major Infrastructure, undated, paragraph 29.

## Recommended amendments

41. I recommend Rule 15A is amended, (by the inclusion of proposed Rule 15A and Rule 15B) and a new Schedule 4 be introduced into the Plan. The words that are double underlined or ~~struck through~~ denote the differences from the rule as notified. Single underlining identifies words or phrases that are defined in the Plan:

### Rule 15A

Any activity ~~that complies with Rules 2, 3, 6 and 7 and is the subject of an existing consent~~ the subject of an application to renew a resource consent referred to in Schedule 4, to take, dam, divert or use water for ~~hydro-electricity~~ generation is a controlled ~~restricted discretionary activity~~, provided that the activity:

- i. complies with Rules 2, 3, 6 and 7; and
- ii. does not affect the flow of the Pūkaki River, the Lower Ōhau River or the Tekapo River (above the confluence with the Forks Stream), except where the environmental flow and level regimes for these rivers has been reviewed and made operative.

The ~~exercise of discretion is~~ matters of control are restricted to the following matters:

- ~~1.~~ 1. In respect of flows into the Pūkaki River, the Lower Ōhau River or the Tekapo River (above the confluence with the Forks Stream), ~~adverse effects, including effects on Ngāi Tahu culture, traditions, customary uses and relationships with land and water, unless the environmental flow and level regimes for these rivers have been reviewed after the public notification date of this rule and the outcome of the review has been made operative in accordance with the relevant provisions of the Resource Management Act;~~
- ~~2.~~ a. Any mitigation measures to address adverse effects (including effects on Ngāi Tahu culture, traditions, customary uses and relationships with land and water), except for changes or alterations to environmental flow and level regimes, minimum lake levels, annual allocation to activities, or the provisions of flows into the Lower Waitaki River, set by this Plan;
- ~~3.~~ b. Collection, recording, monitoring and provision of information concerning the exercise of consent; and,

4. c. Lapse period, duration of consent and review requirements.

Any application made under Rule 15A will be publicly notified.

**Rule 15B**

Any activity the subject of an application to renew a resource consent referred to in Schedule 4, to take, dam, divert or use water that complies with Rules 2, 3, 6 and 7 but does not comply with condition (ii) of Rule 15A is a restricted discretionary activity. The exercise of discretion is restricted to the following matters:

- a. Positive effects;
- b. Adverse effects (including effects on Ngāi Tahu culture, traditions, customary uses and relationships with land and water);
- c. Collection, recording, monitoring and provision of information concerning the exercise of consent; and
- d. Lapse period, duration of consent and review requirements.

Any application made under Rule 15B will be publicly notified.

**Schedule 4: Hydro-electricity generation consents referred to in Rule 15A and Rule 15B.**

The following consents, including their derivatives, relate to the taking, damming, diverting or use of water associated with the Waitaki Power Scheme. A derivative is any consent that arises as a consequence of changes to a consent (provided that the change does not increase the scale, intensity or character of the activity) listed in this Schedule, whether the change arises through a change to conditions, a transfer, or a consent issued in replacement of one listed in the Schedule.

<u>CRC905321.7</u>	<u>CRC905337.1</u>	<u>CRC905360.1</u>	<u>CRC905312.2</u>
<u>CRC905324.1</u>	<u>CRC905338.1</u>	<u>CRC905361.3</u>	<u>CRC905313.2</u>
<u>CRC905326.1</u>	<u>CRC905339.1</u>	<u>CRC905301.4</u>	<u>CRC905314.2</u>
<u>CRC905327.1</u>	<u>CRC905340.1</u>	<u>CRC905302.3</u>	<u>CRC905315.2</u>
<u>CRC905328.1</u>	<u>CRC905342.1</u>	<u>CRC905305.2</u>	<u>CRC905316.2</u>
<u>CRC905329.1</u>	<u>CRC154049</u>	<u>CRC905306.3</u>	<u>CRC905317.2</u>
<u>CRC905330.3</u>	<u>CRC905344.4</u>	<u>CRC905307.2</u>	<u>CRC905318.2</u>
<u>CRC905331.1</u>	<u>CRC905345.1</u>	<u>CRC905308.2</u>	<u>CRC905319.2</u>
<u>CRC905333.1</u>	<u>CRC905351.3</u>	<u>CRC905310.2</u>	<u>CRC083496.1</u>
<u>CRC905335.3</u>	<u>CRC905352.1</u>	<u>CRC905311.2</u>	<u>CRC111767</u>