

Tabled at Hearing on 17 November 2015

**BEFORE THE CANTERBURY REGIONAL COUNCIL
AT TIMARU**

Under the

Resource Management Act 1991

In the Matter of

Proposed Plan Change 3 to the
Canterbury Land and Water
Regional Plan (South Canterbury
Coastal Streams)

**ORAL SUBMISSION TO THE PROPOSED PLAN CHANGE 3 TO THE
PROPOSED CANTERBURY LAND AND WATER REGIONAL PLAN**

BY THE LOWER WAITAKI RIVER MANAGEMENT SOCIETY INC

History of the Society (Presented by Ian McIlraith, Chairman)

1. The Lower Waitaki River Management Society (LWRMS) was formed from a steering group in July 2004. A community-based management plan was developed for the Lower Waitaki River using the principles of Integrated Catchment Management with participation and buy in from all river stakeholders. The process began with large public meetings facilitated by Environment Canterbury, involving individuals and organizations from right across the community with an interest in the Lower Waitaki River.
2. To ensure that the Lower Waitaki River Management plan was based on sound and up-to-date scientific information, the public meetings featured specialist speakers from a range of fields including braided river ecology, geomorphology, ecology, irrigation, weed control, as well as information on access, land tenure, ownership and existing management. In addition to scientific information, all individuals and organisations with an interest in the future management of the Lower Waitaki River were invited to provide their views. Consequently, the LWRMS was well-informed, having a clear and representative understanding of the sustainability issues facing the river and community aspirations.
3. To develop the management plan, the Steering Committee was elected by the wider community and was made up of irrigators and irrigation companies, Meridian Energy, conservationists, recreationalists, anglers, adjacent landowners, farming representatives, community representatives, and coastal farmers. The formally adopted mission statement – the guiding principle of the management strategy is:

“to protect and enhance, in a sustainable way, the lower Waitaki river system”.
4. The three goals of the strategy are:
 - The community and statutory authorities work together to prepare, monitor, update and implement the management strategy for the Lower Waitaki River which integrates the environmental, social, economic and cultural values of the community
 - To protect and enhance the natural environment for the benefit of present and future generations.
 - To provide for safe and balanced recreation.

5. There are currently sixteen members serving on the board. The wide spectrum of interests that the committee comprised at the outset remains, including several farmers and retired farmers (some with irrigation experience). The Society currently has a membership including the Waimate Rod and Gun Club and The Waitaki Riparian Enhancement Society (with representatives on the Board) which together have over 300 local members. The Society's strategy supports efficient irrigation and sustainable land use. The potential economic benefit derived from irrigation is not questioned.

Reasons for the Society's interest in South Canterbury Streams

6. While the main focus of the Society is the Lower Waitaki River, its members have a genuine interest in seeing a healthy natural environment generally in the district. The LWRMS membership also includes ratepayers and residents of the Waimate District who are directly affected and consequently impacted by the plan changes. Over and above this, the Society has the following main reasons to be submitting on this plan change.
 - If water is to be taken from the Lower Waitaki to augment streams in South Canterbury streams it should be on grounds that are demonstrably sound and sustainable
 - The potential affect of water quality standards derived in Plan Change 3 affecting other proposed water quality Plan Changes in the pipeline for catchments in the Lower Waitaki catchment.
7. In our view, this is a critical proposed plan change because, subsequent to this, we shall be concerned with the sub catchments of Northern Fan and Hakataramea, both of which affect the Waitaki River. In both cases the respective group meetings have decided to progress matters with a streamlined process using the SCCS framework as a starting point.

Society initiatives regarding Plan Change 3, SCCS prior to notification

8. In 2014, the Environmental Protection Authority (EPA) released its decision on the Tukituki Plan Change 6 and Ruataniwha Dam and the EPA's board of inquiry imposed strict conditions requiring phosphorous and nitrogen levels to be managed to limit damage to river quality. In

July that year the Society wrote to the Zone Committee asking that the same two key conditions for protecting ecological health there be adopted for the Lower Waitaki and the South Canterbury Zone.

9. These were i) the maximum nitrogen concentration of 0.8mg/L and ii) that both Nitrogen and Phosphorus must be controlled to minimise the risk of periphyton (algal) growth.
10. we are aware that the Zone Committee discussed our letter at their monthly meeting in Sept 2014, however no proper response addressing our concerns was received by the Society.
11. Then in June 2015, the Society became aware quite by chance that the Hunter Downs Irrigation Scheme Trust (HDIST) had applied for a resource consent to discharge nutrients to land from the Scheme under the Canterbury Land & Water Regional Plan (pLWRP).
12. It seemed that HOIST were applying for an average nutrient loss rate that would be higher than that developed by the community during the consultation process for PC3 SCCS intended to meet sustainable management criteria. As the 43,400 ha command area of the proposed scheme would effectively include all the lowland area covered by PC3 SCCS, the conditions of the resource consent would effectively override the targets set in the Plan. The Scheme has resource consent to take water but has still to be constructed.
13. Because of the very large scale of the proposal, its high potential impact and the importance of river quality to the wider community economy and the ecological health sought in the region, the Society wrote to Ecan asking that the application be notified and to ensure it takes into account any improved understanding there is now on sustainable nutrient loads.
14. There was also concern that the flexibility cap approach may encourage farmers, currently with low-emission enterprise to become higher emitters in order to enhance their property value.
15. The reply from Mr Bill Bayfield (CEO) indicated that irrigation schemes had special conditions and didn't need to comply with the flexibility caps but that they would be carefully assessing impacts on freshwater outcomes in Tables 15(a) and (b). We can therefore assume no robust analysis or assessment is made until after the HD scheme is constructed. It still remains unclear to us how Ecan proposes to handle the consent (CRC156580) process in respect of that application. The two items of correspondence are lodged in Appendix A

Summary update of subjects raised in the LWRMS formal submission (Presented by Max Crowe)

16. Table 1 below summarizes the issues raised in the Society in their formal submission

Table 1: Update of the issues and expectations from the LWRMS formal submission

Paragraph numbers	Subject	Main issue with PC3	Current status/expectation
1 - 4	Approach to setting targets and limits	Wrong targets, fails CWMS criteria, fragments rivers and is impractical	Dr Mike Joy to address in evidence/answers to questions.
5, 6	Existing Water quality	WQ already too low in some places, fails CWMS criteria	Dr Mike Joy to address in evidence/answers to questions
7 - 9	Absolute level of targets and their application	Wrong criteria for targets, fails CWMS and NPS criteria	Dr Mike Joy to address in evidence/answers to . Discussed further in this Oral submission
10 - 13	River and lake targets	Does not adequately consider relationship between rivers, estuaries and lakes in setting limits and value of augmentation	Relying on other experts such as Schallenberg under questioning and the caucusing
14, 15	Terminology, freshwater management units and indicators of ecosystem health	Terminology that provides appropriate legal weight and consistency between planning documents.	Dr Mike Joy to address in evidence/answers to questions, Dr Hamish Rennie to consider in caucusing for the Society.
16, 17	Coastal impacts	Considering coastal/marine ecosystem health in setting freshwater limits	Relying on explicit provisions in RMA (integration), NPSFWM and NZCPS and CWMS objectives. Discussed further in this Oral submission
18	Short term	Contains insufficient	Dr Mike Joy to address in

	fluctuations	precaution and redundancy in WQ targets	evidence/answers to questions
19, 20	Contaminant pathways	Uncertainty between the modelled leaching loads and their effect on river WQ.	Relying on other experts under questioning and the caucusing.
21 - 26	Good management practice	Relies upon GMP when it is still under development and therefore not verified	No proof of performance around GMP remains major concern for the Society. Further comment is provided in this oral submission
27	Infrastructure investment	Permits investing in development before impacts are verified and thereby risks not being able to correct due to level of investment.	Relying on other experts and economic assessment. Further comment is provided in this oral submission
28 - 32	Integrated management of catchments	Has not met this requirement because it fails to identify and optimise the potential within its own catchments before looking to augmentation	No expert available. Further comment is provided in this oral submission.questions

Further comment on Absolute level of targets and their application

17. Dr Mike Joy's evidence is in keeping with our overall submission regarding the risks posed to the intrinsic value, beyond amenity, of fresh-waters in South Canterbury, without assured and highly effective mitigation methods. From this it may be reasonably inferred that other values such as biodiversity and ecosystem services will be more likely to decline if his maximum recommended thresholds are transgressed. On the basis of actual data he also supports our assertion that much of the lowland freshwater environment is already significantly degraded.

18. In our submission we refer to various planning provisions with which PC3 would be in conflict if there were loss of such freshwater

attributes. We therefore submit that if it is to comply with such planning provisions the plan must incorporate Dr Joy's provision, among others, to control the risk of periphyton (algal) growth.

19. On plain reading, we consider Objectives A1 and A2 in the NPSFWM are clear on the requirement to "safeguard life-supporting capacity, ecosystem processes..." and therefore that defaulting to the National Values will not comply if it means that these attributes are at risk.
20. As indicated in our submission, the Society considers that the limit setting process Ecan have adopted requiring water quality targets and limits for individual catchments or river reaches as being more complex than is necessary, wise or possibly legitimate. Adoption of Dr Joy's nitrogen value of 0.8mg/L DIN as a general limit would simplify the limit setting process and later make compliance monitoring more practical.
21. It would also remove some of the burden that volunteer groups shoulder trying to provide a voice for instream values over and over again. All most NZers want is clean attractive rivers that they can enjoy and from Mr Joy's evidence the bottom line to achieve that is similar for all rivers.

Further comment on Coastal impacts

22. It is mandatory that regional plans give effect to the New Zealand Coastal Policy Statement (NZCPS). Under s.67(3)(b) of the Act, this includes plan variations such as PC3. Objective 1 of the NZCPS seeks to safeguard coastal environments by maintaining and enhancing natural biological and physical processes through appreciating "their dynamic, complex and interdependent nature".
23. Largely as a result of the production of artificial nitrogen, at a global scale we are producing far in excess of what the environment can safely assimilate on land and in oceans (Steffen *et al.* 2015). Phosphorus is similarly in excess and is a finite resource. Excess nutrient tends to migrate to the coast and ocean and therefore its ecological health can not be managed without taking into account the impacts of land-based activities. We therefore submit that this excess nutrient environment should be the underlying context for nutrient planning and management at all levels.

24. To create plans that meet sustainable nutrient management criteria there are therefore two primary paths. One is to mitigate nutrient use, the other is to minimise the use of artificial nutrient supplements. The Plan does attempt to address the former but not directly the latter.
25. The Society therefore ask that provisions be made to require and incentivise landuse pattern and landuse practice that minimises the need for supplementary nutrient input and maximises nutrient capture and recycling. Less nutrient use by individuals will have the benefit of extending the safe available allocation.

Further comment on good management practice (GMP)

26. Proposed PC3 acknowledges heavy reliance on GMP practice as an intervention in mitigating nutrient and other contaminant effects. However, we have not been able to find any empirical evidence that gives us confidence that the GMP listed in Schedule 24b will result in the targets being reached. The society feels that the Council's reliance on these unproven mitigation strategies is unnecessarily risky and is at odds with the cautionary principle stated within the CWMS.
27. Furthermore, the Matrix of Good Management (MGM) project is still underway, and there does not appear to be any provision for introducing updated GMP to the plan as they are developed. We are pleased to see reference to this issue in Minute 2 from the commissioners (9 November 2015), and agree that there needs to be more thought given to how the currently evolving MGM process can best be incorporated into the Plan.

Wainono augmentation provision

28. The plan change relies on the augmentation of the Wainono lagoon which is not yet confirmed. Indeed the Zone Implementation Programme states that "augmentation is critical".
29. The Society has specific concern over this allocation for augmentation as it will directly impact the flows within the Waitaki River and there has been no convincing evidence that augmentation will allow the targets to be reached. Several expert witnesses, notably Dr Gerbeaux in his evidence for the Department of Conservation, have criticised this provision as being inadvisable and unproven, and that the proposed

augmentation may even exacerbate the current situation of high turbidity.

30. Furthermore, the Society is also concerned by provision (15.4.8), which makes availability of flexibility caps for farms within the Waihao-Wainono Area contingent on augmentation having occurred within the previous calendar year. The Society is unconvinced that a calendar year will be sufficient to ascertain the effectiveness of the augmentation program.

Further comment on Infrastructure Investment

31. The plan anticipates that achieving the permitted loading rates will result in the targeted outcomes for water quality. What will be done in the situation where all farms are Overseer-compliant and abiding by GMP, and yet monitoring shows that targets are not being met?

32. For these situations the society perceives two options:

- lower environmental outcomes are accepted.
- farmers are required to modify their operations, which could be economically prohibitive.

What would the legality be around these options?

33. Furthermore, if targets are not being met, will current monitoring arrangements enable non-compliant operators to be identified, or would Overseer be relied on for a definitive decision in such circumstances?

Further comment on Integrated management of catchments

34. Policy C1 in the NPSFM states "By every regional council managing fresh water and land use and development in catchments in an integrated and sustainable way, so as to avoid, remedy or mitigate adverse effects, including cumulative effects".

35. The Society consider this to be a very clear statement about the requirement for fully integrated resource management. The term appears in many plans but its importance probably not yet fully appreciated or acted upon.

36. If it is accepted that instream ecological values must be retained then according to our expert evidence the targets will need to be changed.

All other things being equal this is likely to have implications for the maximum intensity of landuse in the area.

37. However the nutrient load that a given catchment can safely assimilate and discharge is a function of the proportion of the precipitation that can be captured, the seasonal release profile and the extent to which nutrient can be retained within the root zone. The potential to influence these favourably has not been explored in this plan change process yet it is clearly an element of integrated resource management.
38. Moreover, catchment management and sustainable land and water management are key development areas which present opportunities to achieve water security, ecological stability, climate adaptation and (to the extent that the process enhances carbon sequestration), climate mitigation (meets NPSFWM Policy B1)
39. Thus, avoiding overallocation of nutrients need not prevent development. Rather, it may lead to more robust landuse systems, better suited to the more extreme weather patterns that the IPCC predicts we should expect.

Planning Considerations

40. The Society has become aware of a case regarding the granting of the resource consent for the Ruataniwha Dam, which has subsequently been clarified by the Environment Court's March 2015 decision. This is seen to be of relevance to PC3.
41. It relates to section 30(1)(c)(ii) of the RMA, which requires regional council's to uphold the function of the maintenance and enhancement of the quality of water in water bodies and coastal water. The definition "water body" is interpolated from its definition in s.2 of the Act as: ...fresh water or geothermal water in a river, lake, pond, wetland, or aquifer, or any part thereof, that is not located within the coastal marine area.
42. In its March 2015 decision the Environment Court ruled that: 'This function is not optional - it is something a regional council is required

to do, whether it be difficult or easy. (Decision of 27 March 2015. Ngati Kahungunu Iwi Inc. v Hawkes Bay Regional Council. At Para 29).

43. Although this decision related to objectives in a RPS, it raises questions as to whether this also applies to rules, given that these are the primary means for control of land use. The Society is therefore interested to know if this decision is relevant here.
44. The Society, in considering the Ruataniwha decision, believe that members of the Zone Committee and of the Council would have acted differently in preparing the plan change if this understanding of the planning regime were emphasised more.
45. It is entirely probable, that had the Council and the Zone Committee been acting under a correct understanding of the planning regime, the plan would be significantly different and the provisions that allow for a decrease in water quality and the gambling of that quality on the basis of improvements whose effectiveness is highly questionable would have been based on a more cautionary approach (in accordance with the cautionary requirement in the vision and principles of the CWMS). In addition, the precautionary approach is apparent in s.3 of the RMA, which requires decision makers to take into account "any potential effects of high probability; and any potential effect of low probability which has a high potential impact".
46. If this is the case then the plan change has been prepared in the context of a misinterpretation of the law, and the misinterpretation would be fundamental to the entire plan.
47. It is the Society's submission that the extent that the plan allows a decrease in water quality cannot be seen as representing a community plan or view relevant to the requirements of the RMA, or even the relevant discourses, even if we were to concede that at any stage it represented a community view.
48. This understanding in part, derives from the Environment Canterbury Act 2010 (Ecan Act), which specifies the visions and principles of the CWMS under Schedule 1. At the regional level, planning of natural

water use is prioritised by first and second order considerations. Here, it clearly states that the environment takes primacy over irrigation, renewable electricity generation, recreation, tourism and amenity.

49. In deciphering the significance of this information, we suggest that PC3 does not align in full with either current interpretations of the Act or the entirety of community views. Accordingly, the Society consider that the process has been hindered and needs thorough review or to be started again from a baseline of the *Ngati Kahungunu Iwi Inc. v Hawkes Bay Regional Council Decision (Ruataniwha Dam)*.

Recommendations for additional caucusing

50. Contaminant pathways: There appears to be significant uncertainty between the modelling of the loading rates, the actual loads and their relationship to the water quality targets. This is a crucial part of achieving a reliable plan and we submit, should be included in caucusing.

51. In-catchment water optimization: In order to meet the requirements of developing the catchments in a integrated and sustainable way (NPSFM 2014, Policy C1), the Society requests that caucusing be extended to include how best to enhance water infiltration and aquifer recharge within the zone catchments across the landscape.

52. Planning Interpretation: Review plan development process in the light of the *Ngati Kahungunu Iwi Inc. v Hawkes Bay Regional Council decision* regarding the interpretation of RMA s30.

Ian McIlraith (Chairperson, LWRMS)

Max Crowe (Board Member, LWRMS)

References

Steffen W. et al, Planetary boundaries: Guiding human development on a changing planet, *Scienceexpress*. Published online 15 January 2015; 10.1126/science.1259855

APPENDIX A: Correspondence with the South Coastal and Canterbury and Lower Waitaki Zone Committee concerning proposed Plan Change 3 to the Land Water Plan

LOWER WAITAKI RIVER
Management Society Incorporated



Secretary
Francis Whitlock
Lower Waitaki River Management Society Inc
RD6H
Oamaru 9493

16 July 2014

Chairman and Committee Members
Lower Waitaki South Coastal Canterbury Zone Committee
Canterbury Regional Council

Dear Sirs,

Water quality management in the Lower Waitaki and South Canterbury Zone

The Environmental Protection Authority (EPA) released its decision on the Tukituki Plan Change 6 and Ruataniwha Dam which gave consent for the scheme and set water quality measures for the catchment.

The EPA's board of inquiry imposed strict conditions requiring phosphorous and nitrogen levels to be managed to limit damage to river quality. These included two key conditions:

1. The maximum Nitrogen concentration in the river to protect its health is to be 0.8mg/L even though specific "toxicity" levels for most fish are significantly higher (e.g. perhaps 3mg/L or higher)
2. Both Nitrogen and Phosphorus must be controlled to minimise the risk of periphyton (algal) growth, not just Phosphorus as the applicants wanted.

It was reported on 4 July 2014 that the Hawke's Bay Regional Council would not be appealing the decision. Council Chairman Fenton Wilson was reported as saying that the Council believed the Tukituki River will be protected and the EPA's decision struck a balance between environmental and economic interests.

Given that this decision was based on extensive evidence, it appears to the LWRMS that these conditions are principles that should apply to other NZ rivers subject to nutrient contamination if they are to keep them healthy including those in Lower Waitaki and South Canterbury Zone.

Is it therefore the intention for the South Canterbury and Coastal Zone Committee to adopt these same two key conditions for rivers in their zone? If not, could the Zone committee explain the reasons for not doing so, including the ecological basis?

Yours

Ian McIlraith
Chairman

LOWER WAITAKI RIVER Management Society Incorporated



Mr Bill Bayfield
Chief Executive
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Christchurch.
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18 June 2015

Dear Sir,

HUNTER DOWNS IRRIGATION SCHEME TRUST - APPLICATION FOR DISCHARGE CONSENT

We have become aware that the Hunter Downs Irrigation Scheme Trust (HOIST) have applied for a resource consent discharge of nutrients (along with associated land use) from the Scheme under the Canterbury Land & Water Regional Plan (pLWRP). Hoist was formally known as the South Canterbury Irrigation Trust and, with Meridian Energy Limited, jointly holds resource consent CRC142804 in relation to the take and use of water for the HDI.

As the scheme plans to command the vast majority of the flat land between Waimate and just short of Timaru (some 43,400ha) it also happens to coincide with a large part of that agricultural land proposed to be managed under Variation 3. See Figures 1 and 2 appended to this letter.

It also appears as if the nutrient loading rates proposed in the discharge application are higher than those identified by the community and proposed in Variation 3. The covering letter states:

"Under the resource consent sought, it is proposed that the maximum rate at which nitrate- nitrogen may be lost by scheme shareholders shall not exceed a total of 1,120T/yr. This is based on the consented command area and the average nutrient loss for of 26.5kg/ha/yr".

This average nutrient loss per hectare appear to exceed those proposed in Table 15(m) in the Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan which sets out the allocable nitrogen loss rate for different areas (see table 15(m) below).

We note too that in addition to complying with the loading rates, the freshwater outcomes in Tables 15(a) and 15(b) must also be met by 2030.

HOIST wish to pre-empt the Variation by having the application processed non-notified before the Variation is formally considered. It argues that the potential effects of the loading rates were already considered and accepted under its Resource Consent to take and use water from the Waitaki for the Hunter Downs irrigation scheme.

As you will be aware, the Lower Waitaki and South Coastal Canterbury Zone Committee, with Environment Canterbury support, has facilitated an intensive consultation process in South Canterbury to develop loading thresholds that are intended to be sustainable. If this application goes through as proposed, it will make a mockery of that process and put at risk all the tributaries within the irrigation command. This would not represent sustainable management of natural and physical resources.

As submitters to Variation 3, our Society wishes to express its deepest concern about this situation. Construction of the Hunter Downs scheme has not yet started, so any implications of reduced nutrient loading rates can be taken into account.

We expect that Council will take into account the better understanding there is on what are sustainable nutrient loads for that area of South Canterbury in any new application for discharge. And because of the scale of the proposal, its potential impact and the importance of river quality to the economy and ecological health sought in the region, we also consider notification of this application would be automatic.

Yours sincerely

Ian McIlraith
(Chairperson)

Figure 1: The area under consideration for nutrient load limits and targets under Variation 3

Map 1: South Coastal Canterbury Areas Boundary

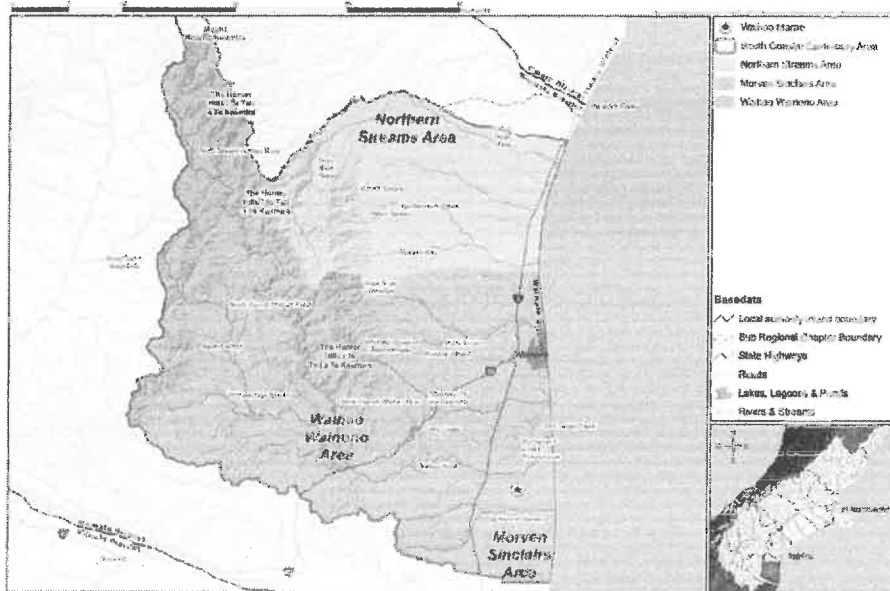


Figure 2: Proposed irrigation command area for the Hunter Downs irrigation scheme

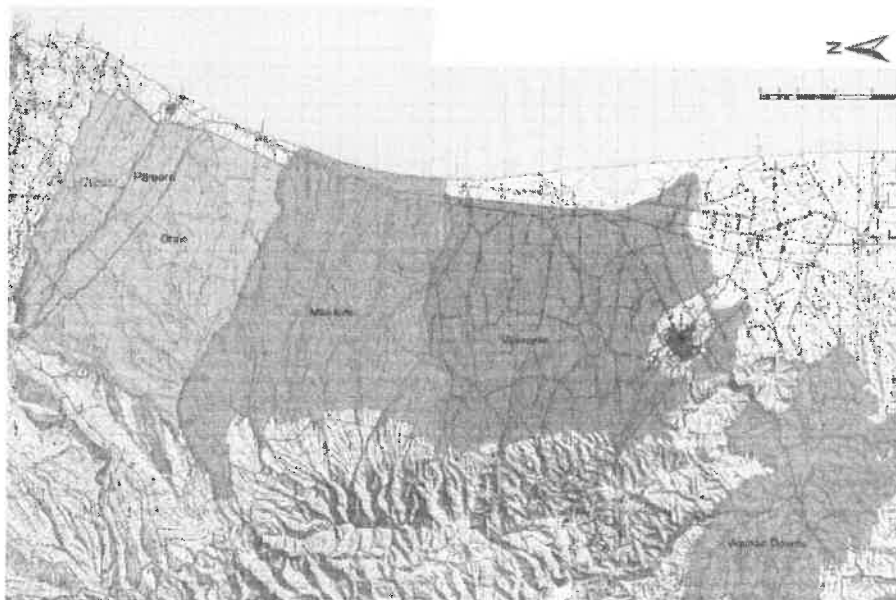


Table 15(m): Nitrogen Flexibility cap limits for the Northern Streams and Waihao-Wainono Areas

	Waihao-Wainono Area				Northern Streams Area		
	Waihao-Wainono Plains			Waihao-Wainono Hill	Northern Streams Plains		Northern Streams Hill
	A	B	C	D	E	F	G
	From 01 May 2015 and when augmentation has not occurred in the preceding calendar year	When augmentation has occurred in the preceding calendar year	When augmentation has occurred in the preceding calendar year and after 01 January 2030*	From 01 May 2015	From 01 May 2015	After 01 January 2030*	From 01 May 2015
Flexibility Cap (kg/N/ha/yr)	10	15	17	5	15	17	5

* Freshwater outcomes in Tables 15(a) and 15(b) must also be met.

30 June 2015



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Ian McIlraith
Chairperson
Lower Waitaki River Management Society Incorporated

via email: <mailto:ian.mcilraith@gmail.com>

Dear Mr McIlraith

Consent CRC156580 Hunter Downs Irrigation Scheme Trust

Thank you for your letter of 19 June 2015 outlining your concerns in regard to the Hunter Downs Irrigation Scheme Trust (HDIST) discharge permit, CRC156580.

I can advise that currently no decision has been made about notification.

As stated in your letter, HDIST has applied for a total scheme load of 1,120 tonnes per year, based on the consented command area and the average nutrient loss of 26.5kg/ha/yr. They have indicated, within the proposed consent conditions, that they intend to apportion the load via catchments, and individual farms will comply with the maximum caps specified in Table 15(n) of proposed Variation 3.

While I note your concern that they are not proposing to comply with the flexibility caps in Table 15(m), the policy and rule framework within Variation 3 does not make this necessary for irrigation schemes.

In saying that, however, we will be carefully assessing the effects of the proposal on the environment, including the impacts on the freshwater outcomes in Tables 15(a) and (b).

Environment Canterbury staff have had discussions with staff from HDIST throughout the development of proposed Variation 3. These discussions were specifically on how to achieve the outcomes sought by the community while enabling the granted HDIST consent (CRC142804). Consequently, allowing HDIST to apply for a change in consent while also giving effect to a community consulted document(s).

I appreciate you contacting us with your concerns, and we will keep you informed as the consent progresses.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Bill Bayfield', written over a white background.

Bill Bayfield
Chief Executive

Our ref: CRC142804; CRC156580
Your ref:
Contact:

