

Before the Hearing Panel appointed by Canterbury Regional Council

IN THE MATTER OF The Resource
Management Act 1991
AND

IN THE MATTER OF Application CRC190445
by Christchurch City
Council for a discharge
permit to discharge
stormwater into land and
to water and a coastal
permit to discharge
stormwater to coastal
water from the reticulated
stormwater network.

**SUMMARY OF SECTION 42A OFFICER REPORT OF NICK REUTHER
FOR CANTERBURY REGIONAL COUNCIL**

14 November 2018

INTRODUCTION

1. My name is Nick Reuther. My qualifications and experience are outlined in my Section 42A (s42A) report dated 1 October 2018.
2. There have been ongoing and productive discussions between the Christchurch City Council (CCC or the Applicant) and Canterbury Regional Council (CRC) staff prior to and throughout the hearing during which a number of issues have been resolved. This summary highlights the key areas of agreements reached and outlines the matters the two councils still disagree on.

CORRECTIONS TO REPORT

3. A correction was requested by Land Information New Zealand (LINZ) to Paragraph 156 of my Section 42A report. I am aware that the decision-making process on Crown owned Residential Red Zone land is still underway, and consider that the Paragraph 156 should therefore read:

*[...] **It is understood that land may** ~~Land became~~ **become** available through the decision process for the future use of the Residential Red Zone (RRZ) along the Avon River Corridor, where larger facilities **may** ~~are understood to be~~ constructed over the next few decades. [...]*

4. The recommendations to establish a Stormwater Technical Advisory Panel (Stormwater TAP) under Paragraphs 206 and 510 of my s42A report refer to such a panel undertaking an independent certification of final documents to ensure that best practice has been applied in all technical areas covered. Further, Ms Michele Stevenson in her s42A report (Paragraph 73) recommended that the Stormwater TAP audit and approve Stormwater Management Plans (SMPs). I note that the Stormwater TAP was intended to provide an independent review of, and technical input into, SMPs, as well as the investigations and feasibility studies proposed by the Applicant under Conditions 37 and 38. Certification of the submitted documents would still lie with the CRC. The Stormwater TAP is addressed further below.

KEY POINTS RAISED

Adaptive Management Approach

5. The approach under the Comprehensive Stormwater Network Discharge Consent (CSNDC) is an example of adaptive management where mitigation

options to address environmental effects can be modified based on monitoring and modelling data. Such an approach is typically used when there is a greater level of uncertainty about the impacts of a proposal, and therefore a greater reliance on monitoring, evaluation of data and feedback loops to address effects.

6. As outlined in my s42A report, I consider that for the CSNDC an Adaptive Management Approach to the management of stormwater discharges is appropriate, as the proposal meets the basic principles of adaptive management in the context of resource consents.

Definition of Stormwater Network

7. The purpose of the CSNDC sought by the CCC is to authorise all discharges within the urban limits from the CCC's reticulated stormwater network that have been accepted by the Applicant. In addition, it is understood that CCC wishes to provide a level of service to cover under the CSNDC direct discharges from individual sites to waterways (both natural and artificial), and some discharges from individual sites onto and into land.
8. There has been discussion during the course of the hearing of the appropriateness of including Christchurch's main river catchments, i.e. the Ōtākaro/Avon River, the Huritini/Halswell River, the Ōpāwaho/Heathcote River, the Ōtukaikino River and the Pūharakekenui/Styx River and their tributaries, within the definition of 'stormwater network' (refer Proposed Conditions 5 November 2018 version).
9. In my view, the concerns raised by submitters, including that the inclusion of the rivers and their tributaries could reduce the CRC's powers to prosecute polluters of the rivers, and a number of uncertainties around whether or not the receiving environment can be included as part of the network, can be addressed by:
 - a. Removing the rivers and their tributaries from the definition of 'stormwater network' under the CSNDC; and
 - b. Amending Proposed Condition (1) to reflect that with regard to discharges of stormwater to surface water the CSNDC authorises:

- i. Discharges from the stormwater network (as defined under the LWRP); and
 - ii. Direct discharges to surface water bodies (both natural and artificial) from individual sites that do not occur via the CCC's network.
10. These changes, in my view, would ensure that the Applicant is able to provide the desired level of service, which would avoid a large number of individual resource consents being required for the direct discharges of stormwater from individual sites, while being clear on the distinction between the network and receiving environment. This potential change has been discussed with CCC staff and was agreed in principle as a possible solution to the legal implications around including the river catchments within the definition of 'network'.

Existing Environment

11. In his legal submission for the Applicant, Mr Pizzey states that the environment is to be considered as including the legacy effects of past lawful stormwater discharges as well as those being lawfully exercised under Section 124 of the RMA. Mr Pizzey further states that Council's evidence demonstrates that it is not feasible to consider the environment as if the discharges have been discontinued, and that it would be fanciful and unrealistic to assess this application as if stormwater discharges will otherwise cease to occur (refer to Paragraph 131 of Mr Pizzey's evidence).
12. I generally agree with the statement that Council is unable to 'turn off the tap' or stop the stormwater discharges to and from the network given the requirement to provide this service under the Local Government Act 2001 (LGA), as rain is going to continue to fall.
13. On this basis, I agree that the existing environment can be seen as existing at this point in time, including the effects of the existing stormwater discharges.

All Reasonably Practicable Measures

14. As outlined in Mr Pizzey's and Ms West's evidence, Council now proposes to adopt the obligation to use 'reasonably practicable measures' to achieve the objectives of the CSNDC.

15. While I generally agree with a higher hierarchy threshold for implementing measures to achieve the objectives of the CSNDC, I consider that 'all reasonably practicable measures' as a minimum requirement is more appropriate and a higher standard. This is discussed in more detail in the legal submissions by Ms Mehlhopt. However, I also note that CRC is not opposed to any higher standard (e.g. best practicable options), if the Commissioners consider this is an appropriate standard to be implemented.
16. In addition, I note that 'all reasonably practicable measures' could be defined within the definitions on the CSNDC to assist with clarity and the interpretation of the conditions.

Christchurch Contaminant Load Model

17. Discussion has occurred between CCC and CRC around the intended use of the Christchurch Contaminant Load Model (C-CLM). The C-CLM is Council's proposed method to demonstrate commitment to progressively improve stormwater discharge quality through implementation of all proposed mitigation facilities and measures. The councils have also discussed the recommendations expressed by Ms Stevenson and in my s42A report.
18. The key issues associated with the proposed C-CLM are:
 - a. The importance of provision of contaminant load reductions (CLR) at the catchment scale rather than an overall reduction across all city catchments. This is required to provide consistency with the NPS-FM to demonstrate improvement of degraded waterways. The Table 2 CLR standards currently do not provide any indication of what will be achieved at a catchment level to move towards LWRP outcomes and standards.
 - b. Flexibility within the resource consent conditions to allow the use of best modelling tools available at the time (e.g. adding more appropriate local input data) to establish more accurate contaminant load reductions in Table 2 under Proposed Condition 16 that can be achieved by the mitigation measures proposed, rather than being fixed to the use of the C-CLM for the duration of the consent;
19. The key recommendations to address these issues are:

- a. Catchment-specific CLR targets that are developed through the SMPs;
and
 - b. Investigate the use of more accurate models over the duration of the CSNDC based on local input data and improved modelling technology to improve accuracy around the expected reductions in contaminant loads and effectiveness of mitigation.
20. A recommended framework for alternative conditions of consent is as follows:
- a. The Current Table 2 CLR standards remain in the conditions as an interim solution – this is the best current method of showing the CCC’s commitment to improving the quality of stormwater discharges in accordance with Policy 4.16(e) of the LWRP.
 - b. Additional conditions should provide a clear pathway for investigating more appropriate methods to model CLRs, including the use of catchment-specific input data from monitoring. CCC is to report on the investigation and the ability to replace or amend the C-CLM and standards in Table 2. This can be achieved by either an application by CCC to change conditions of the CSNDC or can be initiated by the CRC via a clause in the condition enabling the review of the consent.
 - c. More appropriate, localised, catchment-specific contaminant reduction targets (not standards) are to be developed through the SMP process to demonstrate the improvement to discharge quality for the catchment. These targets will still allow for flexibility to prioritise works across catchments but within a context of the overall improvement standards for the whole of Christchurch. Conditions would require CCC to report on whether or not the catchment-specific targets have been met, and appropriate responses if targets are not met (e.g. similar to the conditions currently proposed for responding to breaches of the CLM targets) should require more certainty that LWRP outcomes will be met.
21. Catchment specific targets and updated modelling methods could also inform the overall targets under Table 2, which at some stage would likely need to be updated or replaced via a change of conditions.

KEY AREAS OF AGREEMENT

LWRP Policy 4.16

22. As discussed in my s42A report, a clear commitment to work towards meeting the water quality objectives, standards and targets would demonstrate consistency with LWRP Policy 4.16.
23. The concerns that the proposal may not be entirely consistent with Clauses (a) and (d) of Policy 4.16 (some sites, for which discharge permits have been granted recently for a duration in excess of the duration sought for the CSNDC, will continue to be excluded, potentially beyond the duration of the resource consent) have been addressed through the inclusion of the possibility for consent holders to surrender their discharge permits and seek to be included under the CSNDC.
24. With regard to Clauses (c) and (e) of this policy, I generally agree with Mr Pizzey's statement (Paragraph 156 of his legal submission) that the policy requires the Council to demonstrate its commitment by 2025 to progressively improve the quality of the discharge to meet specified water quality outcomes in the future (i.e. post 2025). This commitment has been provided within the CSNDC framework and is demonstrated through the C-CLM.
25. The recommended addition of catchment specific contaminant load reduction targets within each SMP will provide for a greater level of certainty required under this policy and the NPS-FM that improvements will be made on a catchment level within a specified timeframe.

LWRP Policy 4.16A

26. As discussed in my s42A report, it may be beneficial to provide a specific mechanism within the CSNDC to exclude sites that pose a particularly high risk to the environment. The possibility of such an exclusion mechanism was raised in light of the fairly limited enforcement powers currently available to the Applicant under the bylaw processes until such time that Territorial Authorities are provided with greater ability under the LGA to more easily and effectively enforce their bylaws.
27. Policy 4.16A of the LWRP is quite explicit in the expectation that network utility operators account for and are responsible for all discharge via their network. Submitters have also voiced their support for this approach to increase

certainty as to how discharges via the network are managed. Therefore, an exclusion from the CSNDC should only occur in exceptional circumstances, and for the vast majority of sites it is anticipated that CCC managing the quantity and quality of all stormwater directed to and conveyed by the reticulated stormwater system is the default.

28. Further, the exclusion of a particularly high-risk site from the CSNDC should only occur in agreement with CRC by means of certification. This has not been reflected in the Applicant's revised proposed conditions, and an amendment to conditions of consent is recommended to include this additional step required to exclude a site from the resource consent. Should there be any disagreement with a proposal by CCC to exclude a specific site, then this can be elevated to be resolved through the Water Issues Management (WIM) Group.
29. I also note that the ability to decline the acceptance of a discharge to a reticulated network, or the cancellation of an authorisation to do so, is provided for under Permitted Activity Rule 5.93 of the LWRP. Any discharge to a reticulated network that is not accepted by the network owner requires a resource consent under Rule 5.97 for a non-complying activity within the Christchurch City boundaries, or a discretionary activity outside of these boundaries (e.g. within Lyttelton or Banks Peninsula Settlements).
30. While this approach may not be entirely consistent with the intention of Policy 4.16A, it is, in my opinion, likely that the exclusion of certain sites that pose an unacceptably high risk to the environment, or the risk for a site owner/operator to face exclusion from the CSNDC, will provide for better environmental outcomes, and can support CCC in implementing measures to address these adverse effects.
31. An alternative to excluding sites from the CSNDC could possibly be the delegation of enforcement powers, but this would need to be addressed through a separate process subject to agreements yet to be reached between the two councils (e.g. through a revision of the Protocol). I understand that cross-warranting of CCC staff with RMA powers has previously occurred through the Waste Environment Management Team (WEMT), a joint CCC and CRC initiative that dealt with reducing the effects from earthquake waste disposal.

32. There is also a possibility of CRC Compliance staff to take enforcement actions against a site owner/operator. However, this may only be possible if a breach of resource consent conditions has occurred, and not if a discharge does not meet any standards or limits set for a site under a bylaw approval. I also note that CRC staff have recently started to enforce 'on-the-spot' infringement fines for sediment discharges in Christchurch to deal with poor erosion control on building sites. A similar approach would clearly be beneficial for CCC building inspection teams.

Duration

33. My s42A report raised concerns around the requested 25-year duration due to a number of uncertainties (i.e. potential for more than minor effects and the requirement to have regard to Policy 4.11 of the LWRP) and a number of concerns and recommendations from CRC technical experts that were still to be addressed by the Applicant.
34. With regard to the potential for more than minor effects, while these have not been eliminated (as discussed below), I am now generally comfortable with the level of adaptive response proposed by the Applicant to address any effects if these become evident through either modelling or monitoring.
35. CRC's concerns around inconsistency with Policy 4.11 of the LWRP have been addressed by the Applicant by including a review of the resource consent within five years of notification of the Christchurch West Melton Sub-regional Section. This will ensure that the CSNDC's water quality and quantity targets are in line with the outcomes and limits developed through the sub-regional section development process. I consider that in response to concerns from submitters around a longer-term duration, a ten-yearly review of SMPs will provide for an adequate level community of input through SMP development and adaptation of the stormwater management approach at a catchment level directed through the community-informed plan development process. I also note that the Applicant proposes to report in the Annual Plan on the alignment of the CSNDC with any changes in national or regional policy frameworks.
36. Further, there is general agreement between CCC and CRC technical experts on the majority of recommendations made in the respective s42A reports.

37. The Applicant's evidence has highlighted that a long-term duration is desired for the CSNDC, and that a duration of less than 25 years would create uncertainty for Council and would represent an inefficient application of council staff of time and rate payers' money.
38. I generally agree with the aspects of certainty being required and a short-term duration not being an ideal allocation of rate payers' money.
39. Overall, if the Commissioners are of a mind to grant this resource consent, I am of the opinion that a 25-year duration would be appropriate, subject to the outstanding areas of disagreement being addressed (further discussed below) and with inclusion of the recommended amendments to consent conditions.

KEY AREAS OF DISAGREEMENT

Source Control

40. The benefits of source control and the at source contaminant load reductions that can be achieved through non-infrastructure measures such as Industrial Site Audits (ISAs) and Sustainable Urban Design (SUD) have been highlighted throughout the hearing.
41. I consider that CCC has shown commitment through implementing the ISA programme and SUDs such as installation of a number of rain gardens throughout the City. I also understand Council's preference for larger scale facilities and infrastructure solutions as contaminant load reductions can be guaranteed and these measures provide for certainty. However, in my opinion it is critical for the CSNDC to also consider international best practice and more proactive measures to achieve the overall objectives of the consent as source control measures and SUD can play a much larger role in stormwater management.
42. On this basis, I recommend that at the SMP level source control and feasibility of SUD are considered in-depth and that a balance is struck between infrastructure solutions and non-infrastructure measures to address both stormwater quality and quantity.
43. With regard to the ISA programme, the CRCs asserts that at least 30 audits per year or more of sites (that are already authorised under the bylaw) should be undertaken by Council. In my opinion, ISAs are a priority source control

measure, as these effectively address the discharge of potentially significant sources of contaminants for a comparatively small cost to Council.

Minimising Flooding Effects

44. Policy 4.17 LWRP requires that:

Stormwater run-off volumes and peak flows are managed so that they do not cause or exacerbate the risk of inundation, erosion or damage to property or infrastructure downstream or risks to human safety.

45. I note that the policy does not distinguish between a residential property, a rural property, or any other property for that matter.

46. Schedule 7 of the proposed conditions currently sets constraints (for modelled catchments) of the level of effect that is expected and against which the mitigation of effects will be measured. For non-modelled catchments the schedule sets the measures that will be implemented to mitigate water quantity effects. The schedule currently does not have a Receiving Environment Objective (REO).

47. In his EiC (Paragraph 112), Mr Harrington dismisses the need for a Receiving Environment Objective (REO) in Schedule 7 of the CSNDC, as he considers that “*in an absolute sense it would be difficult to comply perfectly with [the] objective*” recommended in my s42A report. I acknowledge the difficulty of compliance with the recommended wording for a REO and do not disagree with Mr Harrington’s reasoning provided for this.

48. I note that the Proposed Condition 22 does not require CCC to meet the Schedule 7 ATLS or uses them as trigger for further mitigation measures or for requiring response from CCC. In absence of a clear Objective for Schedule 7, this introduces uncertainty as to what is required to achieve compliance with this condition and how this condition can be enforced.

49. Instead of including a REO in Schedule 7, I consider that certainty could be achieved by changing the wording of Condition 22 to require that the effects of the stormwater discharges on water quantity are minimised to an acceptable level. An ‘acceptable level’ would be the level identified through the SMP process and described in Schedule 7 of the proposed conditions. The ATLS would provide a means of measuring the extent of water quantity effects within

each catchment. In my view, this would ensure that the level of effect that the CSNDC allows is acceptable and that the proposal is not inconsistent with Policy 4.17.

Technical Advisory Panel

50. As highlighted by Dr Bolton-Ritchie's and Ms Stevenson's expert evidence, the CSNDC application does not include the detailed information that would typically be required for a resource consent application to discharge stormwater to water from an individual site. It is at the catchment SMP level that the details are provided, and specific receiving environment effects are addressed. On this basis, the finalised draft of each new SMP should be scrutinised to a level of detail beyond what could be achieved by a peer review.
51. Therefore, the Stormwater TAP is recommended to provide certainty that the adaptive management approach adopted for the CSNDC will incorporate technical best practice throughout the duration of the consent. This would complete the SMP process by reviewing the final draft document to ensure that best practice has been applied in all technical areas covered.
52. The Stormwater TAP could provide independent, scientific and technical information, guidance and advice on:
 - a. Catchment SMP development and review;
 - b. Investigations and feasibility studies to be conducted under the CSNDC; and
 - c. Actions as a result of investigations/feasibility studies and the development of the scope of works for further actions if they are deemed to be worthwhile.
53. The importance of involvement of Ngā Rūnanga in the processes under the CSNDC has been highlighted in Mr Pauling's evidence, and for this reason Papatipu Rūnanga are proposed to be consulted with throughout the development of the SMPs and during development of mitigation measures. Given the involvement of Papatipu Rūnanga, I consider that it may be beneficial for a Ngā Rūnanga representative to also being part of the Stormwater TAP.

54. The Stormwater TAP is not intended take away Council's function of making a decision on the final SMP version to be submitted to the CRC for certification but will ensure the SMP development and review processes are robust and transparent, and provide the certainty required for the adaptive management approach. If there are any areas of disagreement that cannot be resolved at the operational staff level, then these can be elevated to WIM to find a resolution. CRC would still certify the final SMP submitted.
55. A peer review, as proposed by the Applicant under the revised proposed conditions is more of a retrospective review by an individual reviewer, rather than the proactive approach that the Stormwater TAP offers by providing a small forum to discuss the SMP at a near-completion stage. The Stormwater TAP could also be called upon earlier in the SMP development process to provide technical input.
56. Draft conditions that provide the Stormwater TAP framework are attached to this summary as Attachment 1.

More than Minor Effects on Water Quality

57. Although the existing environment can, in the case of the CSNDC, be seen as the state of the receiving environment at this point in time, stormwater discharges could still be considered as having more than minor adverse effects the receiving waters. Submitters, in specific the Avon Ōtākaro Network, have raised concerns about discharging to an already polluted environment being seen as unproblematic as the receiving environment is already polluted.
58. There are areas throughout the City where the LWRP Table 1 Outcomes are not being met currently and possibly will not be met during the duration of the resource consent. While I acknowledge that Council's approach demonstrates commitment to address this by continually improving the discharge quality, there is insufficient certainty provided to confirm that the effects are no more than minor.
59. While an overall contaminant load reduction is proposed through the conditions of consent (Proposed Condition 16), and although treatment is proposed for new developments, I note that there will be additional contaminant loads entering the receiving environment from new development and intensification

over the duration of the CSNDC. These additional loads will have an effect on the receiving water bodies, although the net effect over time will decrease.

60. I do not entirely disagree with Mr Pizzey's statement that the Council's evidence demonstrates that the proposed conditions and monitoring will ensure that the effects on water quality are no more than minor. I consider that the effects on receiving waters will likely decrease over time, and the adaptive management approach is well placed to deal with effects arising from the discharges. However, I am of the opinion that there is not sufficient certainty that the effects will reduce to a level that is minor across all catchments over the duration of the CSNDC (if granted). This is especially in areas where retrofitting is not feasible or where high contaminant loads cannot be reduced to levels that are sustainable for receiving water bodies. I also note that reducing the effects of the stormwater discharges is tied to available funding secured through the Long Term Plan processes, which in itself provides uncertainty.

Cultural Values

61. CCC and Ngā Rūnanga have reached an agreement regarding the proposal and a letter on non-opposition was provided to the CRC.
62. Mr Craig Pauling on behalf of the Applicant states in his Evidence in Chief (EiC – Paragraph 41) that:
- While the agreement does not necessarily deal with all the issues that Rūnanga have raised within CIAs and through the engagement process, including concerns around the uncertainty of effects on catchments where SMPs and CIAs have not yet been undertaken, it has dealt with the majority of these and demonstrates a pragmatic approach by Papatipu Rūnanga to finding solutions to concerns around cultural effects.*
63. Mr Pauling further considers that the agreement provides evidence that Rūnanga are satisfied with the Mana Whenua Values Monitoring approach and ongoing collaboration (Paragraph 43 EiC).
64. Based on the fact that Ngā Rūnanga are no longer opposing the proposal, it can be assumed that:
- a. The proposed cultural health Receiving Environment Objectives and Targets are not opposed by Ngā Rūnanga;

- b. Ngā Rūnanga is not concerned about the absence of Receiving Environment Objectives or Targets for groundwater quality and quantity and springs;
 - c. Ngā Rūnanga has accepted to undertake the cultural health monitoring with the Applicant; and
 - d. Any ongoing collaboration as specified in proposed consent conditions has been agreed between the parties.
65. While the agreement between the Applicant and Ngā Rūnanga provides certainty that the parties are willing to work together on the matters relating cultural values, the Applicant has pointed out that the letter of non-opposition does not constitute a written approval. In absence of a written approval, or a statement from Ngā Rūnanga that the effects of the proposal on cultural values are acceptable, I am unable to conclude on whether the effects on cultural values are minor.
66. I am, however, confident that the proposed approach will enable ongoing collaboration and resolution of future issues between Ngā Rūnanga and Council.

Section 104D Gateway Test

67. As outlined above, there is uncertainty that the effects on surface water quality are no more than minor. Further, I am unable to conclude what the effects are on cultural values. On this basis, there is uncertainty if the proposal is able to pass the first Section 104D gateway test.
68. However, as outlined in my s42A report, I am of the opinion that the proposal will not be contrary to the objectives and policies of the relevant regional plans.

RECOMMENDED ADDITIONAL CHANGES

69. A number of minor changes to wording of the proposed resource consent conditions are recommended. These will be provided after further discussions have occurred between the two councils around the appropriateness of these recommendations.



Nick Reuther
15 November 2018

ATTACHMENT 1 – STORMWATER TAP DRAFT CONDITIONS

Stormwater Technical Advisory Panel

1. The Consent Holder shall establish, at its own cost, a Stormwater Technical Advisory Panel (Stormwater TAP), which is to:
 - a. Review each Draft SMP, including those being reviewed as required under Condition 4 of this resource consent, and provide technical advice to the Consent Holder as to whether it is fit for purpose and meets the requirements under Conditions (5) and (6) of this resource consent; and
 - b. Provide technical advice on the scope of the feasibility studies and investigations proposed in Tables 3 and 4 of this resource consent and review the outcomes the feasibility studies and investigations to ensure that actions arising from them incorporate best practice technical knowledge.

Advice Note: The technical advice under (b) shall be provided by the relevant experts from the TAP and not the whole panel.
2. The Stormwater TAP shall be established within six months of commencement of this resource consent.
3. The Stormwater TAP shall only meet to examine and provide scientific and technical advice on the matters outlined in Condition (1) (a) and (b).
4. The Stormwater TAP shall comprise no more than six members as detailed below.
5. The Consent Holder shall offer Tangata Whenua the opportunity to appoint one member with expertise in Mātauranga Māori and mahinga kai, and freshwater and coastal ecology and/or water quality.
6. The Consent Holder may appoint up to five independent Stormwater TAP members consisting of the following expertise:
 - a. Stormwater engineering and hydrological/flood modelling;
 - b. Freshwater and coastal water quality and ecology;
 - c. Hydrogeology;
 - d. Contaminated site/land management; and
 - e. Erosion and sediment control.
7. Where the Stormwater TAP does not have the expertise in any of the areas on which it is required to report on, it may engage the services of a suitably qualified expert to advise on any matter required to be reported on.
8. The Consent Holder shall provide any administrative support necessary for the TAP to carry out its functions.