

Resource Management Act 1991

Canterbury Regional Council

Decision of Judith Earl-Goulet (CRC General Manager – Regulatory Services) Yvette Rodrigo (CRC Principal Consent Advisor) and Philip Burge (CRC Principal Consent Advisor)

Applications by Mr P D and & Mrs P A Davies (“the applicant”) to:

Canterbury Regional Council for:

A land use (s13) consent to disturb the bed of the Hurunui River - CRC211031; and

A water permit (s14) to divert the Hurunui River - CRC211032

The Applications

1. The applications to Canterbury Regional Council are for:

***CRC211031:** A land use (s13) consent to disturb the bed of the Hurunui River*

***CRC211032:** A water permit (s14) to divert the Hurunui River*

2. The resource consents are in relation to a diversion channel within the bed of the Hurunui River at Blythe Road. The applicant wants to facilitate a secure supply of water authorised by resource consent CRC203518 by creating a diversion of water from a source braid and along an existing old channel bed of the Hurunui River. The applicant has also applied for consent to allow for on-going maintenance of the diversion channel.
3. The diversion channel is located within the Hurunui River which is a Ngāi Tahu Statutory Acknowledgement Area and within 1000m of a Nohoanga site.
4. A consent duration of 35 years is sought.

Assessment

5. In assessing the above applications, we have read the application documentation and assessment of environmental effects (AEE) and the supplementary response to the s42A recommendation. We did not undertake a site visit.
6. We have read the s42A officer’s report dated 6 October, prepared by Ms Sarangi Sabu, an employee of Pattle Delamore Partners Limited (PDP), who was commissioned by the Canterbury Regional Council to process and prepare a s42A officer’s report for these resource consent applications.
7. Pursuant to s113(3)(b) of the Resource Management Act (RMA) 1991, we generally adopt the report prepared under s42A and it should be noted that the report forms part of this decision. We have however, elaborated on the reasoning for our decision below and expanded the discussion of relevant policies, as we considered that the s42A report did not adequately address all relevant policies.
8. In considering the resource consent applications we have had regard to the matters specified in section 104 of the RMA. This requires us to have regard to a variety of matters, but of specific

relevance to this proposal are the effects and relevant policy documents as these provide the framework within which this decision is made.

Consideration of Effects (s104(1)(a) and s104(1)(ab) RMA)

9. The term **effect** is defined in section 3 of the RMA and includes:

- “(a) any positive or adverse effect; and*
- (b) any temporary or permanent effect; and*
- (c) any past, present, or future effect; and*
- (d) any cumulative effect which arises over time or in combination with other effects – regardless of the scale, intensity, duration, or frequency of the effect, and also includes –*
- (e) any potential effect of high probability; and*
- (f) any potential effect of low probability which has a high potential impact.”*

10. The adverse effects, including potential adverse effects of the proposal are considered “*minor*” by the s42A officer, and the notification decision was made on that basis.

11. Prior to finalisation of the s42A report, a site visit was undertaken by the s42A officer (Ms Sarangi Sabu), a CRC Principal Consent Planner (Mr Richard Purdon), a CRC ecologist (Mr Jarred Arthur), the applicant, their consultant, and a representative of Te Rūnanga o Kaikōura.

12. During the site visit, Mr Arthur identified potential effects on a wetland area within the proposed diversion channel that had not been previously identified and also raised concerns about the potential effects on braids further down from the diversion (as described in a technical memorandum, attached as Appendix 5 to the s42A report and discussed further below).

13. We have considered whether these issues would have changed the decision to limited notify the application or whether any other parties would have been affected. We understand from the information provided to us by the applicant and Mr Arthur that the application to divert water could improve the wetland environment. In addition, the effects on the downstream braids are an extension of the effects already assessed and considered in the application and we have not received any indication from the applicant or CRC reporting officer’s that these effects could be more than minor.

14. We therefore accept the s42A officer’s conclusion that any adverse effects of the proposal, including potential adverse effects, are likely to be ‘minor’, and that therefore public notification was not required.

Ecosystem Health, Indigenous Biodiversity and Hydrological Functioning

15. Initial technical advice from the CRC raised concerns around the potential diversion of water to exacerbate the risk of algal blooms (see paragraph 103 of the s42A report), which is already problematic in the Hurunui River.

16. Following the site visit, Mr Arthur drafted a technical memorandum (Appendix 5 of the s42A report) and raises several potential adverse effects that could arise if this application is granted. These include the potential for the 3-cumec diversion to:

“exacerbate drying in source braids under baseflows, and/or inhibit flushing from occurring in source braids during moderate-to-high river flows”

“reduce braided riffle habitat on the true right of the river, which is important for a range of aquatic invertebrates and fish”

Mr Arthur also notes that the ongoing, and potentially frequent, works to maintain the proposed diversion channel, which would *“exacerbate the risk to river ecology”*.

17. In their memorandum dated 20 October 2021, the applicant reiterates an argument made in their s92 response that, although the applicant has applied for a diversion of up-to-three cumecs, that that would be unlikely to occur at low-flows and that it is more likely to be around 0.5 cumec when water levels are low. The applicant argues that this should be considered in determining the significance of effects.
18. Respectfully we disagree. We must consider what has been proposed. The application in front of us does not propose any reduction from the 3-cumec diversion at periods of low flow (and in fact it is unclear how the applicant will limit the diversion to 3-cumecs given the mobility of braided rivers), and therefore we must consider the full effects of diverting 3-cumecs from the main channel as, if consent is granted, that is what could lawfully occur.
19. We also note that while the s42A officer has concluded that adverse effects are “minor”, the ‘less than minor/minor/more than minor’ tests for notification are not the same consideration that must be made at the substantive decision stage. Rather the test is whether a proposal is acceptable having had regard to adverse and positive effects (including potential effects), the direction provided by the relevant policy documents and the other matters specified in s104 of the RMA.
20. In terms of positive effects, these were identified in section 4.12 of the application as:

“4.12 Positive effects
The proposed works will result in a significant positive benefit for the applicant through a secure supply of water for the recently granted irrigation intake.”
21. We accept this positive effect is likely to accrue to the applicant if this application is granted
22. Mr Arthur also suggests in his technical memorandum that the diversion may improve flushing and water and habitat quality in the ‘backwater’ environment and improve fish passage in the dry braid. It is unclear however, whether the positive effects that might accrue to the applicant, and potential positive effects on the backwater environment are sufficient to outweigh the potential adverse effects of the proposal to the wider river environment.
23. We also note that nothing has been proposed to ensure positive effects on the environment to offset or compensate for any (residual) adverse effects resulting from the proposed diversion (per s104(1)(ab) RMA).
24. In conclusion, if granted, this proposal is likely to provide a ‘significant’ positive effect to the applicant and have potential positive effects on the backwater environment from increased flushing. The applicant has not however, provided any technical evidence to refute, or proposed any actions to remedy or mitigate the potential adverse effects on the broader river environment from algal blooms, drying in source braids and reduced habitat availability identified by CRC scientists. They have also not proposed any offsetting or environmental compensation to try and ‘make up’ for any residual adverse effect on the river environment.

25. Based on the proposal in front of us, we consider residual adverse effects on the wider river environment from a 3-cumec diversion from the current main channel are likely, including potential adverse effects on water quality from algal blooms and on ecosystems and hydrological functioning as identified by Mr Arthur.
26. These effects have the potential to result in a **loss of value**¹ as defined in the National Policy Statement for Freshwater Management 2020 (NPSFM 2020). This is important when having regard to the relevant policies of the NPSFM 2020.

Māori freshwater values

27. The application was limited notified to Te Rūnanga o Ngāi Tahu, Te Ngāi Tūāhuriri Rūnanga and Te Rūnanga o Kaikōura on 21 June. No submissions were received.
28. The applicant concludes that the absence of submissions is evidence that the rūnanga do not consider that adverse effects exist that would warrant the applicant being declined. They then state that only mana whenua can decide the significance of effects on their rūnanga.
29. We agree that mana whenua are the appropriate parties to judge the significance of effects on themselves and we accept the email from Te Rūnanga o Kaikōura as demonstrating that they have no objection with the proposal as replacing the original, pre-notification, comments.
30. We do not agree however, that that email, which represents the view of Te Rūnanga o Kaikōura, can be taken as giving the views of Te Ngāi Tūāhuriri Rūnanga, or Te Rūnanga o Ngāi Tahu. Furthermore, the absence of submissions from Te Ngāi Tūāhuriri Rūnanga, or Te Rūnanga o Ngāi Tahu, is not evidence that they have no concerns.
31. While they did not submit, the initial response from the Tangata Whenua Advisory Service (TWAS), working on behalf of Te Ngāi Tūāhuriri Rūnanga, was that the proposal is partially inconsistent with the Mahaanui Management Plan. In the absence of a submission, we have therefore had regard to the TWAS assessment in the absence of a submission as a relevant matter under s104(1)(c) of the RMA. We conclude that while Te Rūnanga o Kaikōura have no objection, adverse effects on Te Ngāi Tūāhuriri may still occur if consent is granted.

Relevant Provisions of Planning Documents (s104(1)(b) RMA)

32. We note that the relevant regional planning documents are the Canterbury Regional Policy Statement (CRPS), the Canterbury Land and Water Regional Plan (CLWRP) and the Hurunui Waiau Rivers Regional Plan (HWRRP).
33. These documents were developed with significant community input and reference to the relevant higher order documents in place at the time and proceeded through a public planning process. They therefore should be accorded significant weight. As the HWRRP and LWRP were written to give effect to the CRPS, we deem it appropriate, considering the principle arising from *Davidson*² around resorting to Part 2 of the RMA when there are competently prepared planning documents, to focus on the provisions of these planning documents except where they do not give effect to the higher order documents.

¹ The NPSFM 2020 defines **loss of value** in sub-part 3.21

² *R J Davidson Family Trust v Marlborough District Council* [2018] NZCA 316, [2018] 3 NZLR 283

34. In terms of the relevant regional planning documents, we note that the s42A officer has not addressed the relevant regional plan policies and that the applicant has only touched on these lightly in Sections 6.1 and 6.2 of the AEE.

Comment on the relevance of the existing take of water and the planning framework

35. The applicant makes the point that the take forms part of the existing consented environment, under CRC203518, and is consistent with the allocation regime in the HWRRP, and that granting this proposal means:

“the diversion will allow the applicant to meet the economic needs and be an active part of the community”³.

36. We accept that the take forms part of the consented environment and is consistent with the HWRRP allocation regime. For clarity however, we are not reconsidering the effects of that take⁴ and the existing water permit to take and use water (CRC203518) will continue whether this proposal is granted or not. That the take and use permit exists is not material to considering the effects of the proposal currently before us, other than to acknowledge that it is the reason for the proposal. This becomes relevant again further in this discussion.

Hurunui Waiau Rivers Regional Plan

37. The HWRRP manages the take, use, damming and diversion of water in the Hurunui and Waiau catchments. The relevant policies for this proposal are grouped in Part 2.2 of the HWRRP which addresses environmental flows.

38. Most of those policies are regarding the take, damming and use of water, but policy 2.3 seeks to ensure that takes and diversions from the mainstem are managed to ensure minimum flows are met. We have concluded that while this activity will divert water from the main channel, it will not divert water from the mainstem of the Hurunui River which, as a braided river, occupies different parts of its bed at different times. Given this, the diversion does not need to be subject to pro-rata reductions or a minimum flow in accordance with that policy.

39. Policy 2.6 of the HWRRP is more general in its application and is to ensure that the mauri of the Hurunui River is protected from any new “*take, dam, diversion, or discharge*” (emphasis added).

40. Neither the applicant nor the s42A officer appear to have directly assessed policy 2A.4 in the HWRRP, although it was addressed indirectly via a request for further information around functional need and the response to that request.

41. Policy 2A.4 was inserted into the HWRRP (without a Schedule 1 RMA process) by direction of the National Policy Statement for Freshwater Management 2020 (NPSFM 2020). It relates to avoiding the loss of river extent and values except where there is a functional need. Where there is a functional need, the effects management hierarchy should be applied.

42. We will return to this policy later, as it is particularly relevant to this proposal.

³ Response to S92 Request - CRC211031 & CRC211032, P D & P A Davies

⁴ While not considering the effects of the take (CRC203518), we do note that that application indicated water was likely to be taken from a gallery rather than via a waterhole and diversion as is now proposed. No information has been provided to indicate that that option is not viable.

Canterbury Land and Water Regional Plan

43. The LWRP is the relevant plan managing the excavation and disturbance of the riverbed needed to facilitate and maintain the diversion. Policies 4.85A through 4.92 are relevant to the proposed earthworks. We consider that described works are generally consistent with those policies.
44. Policy 2A.4 of the LWRP is identical to the policy of the same number in the HWRRP. As per the HWRRP it was not directly addressed but is relevant to this proposal. As noted, we will return to this later.

National Policy Statement for Freshwater Management 2020

45. Barring the inserted policy 2A.4 in the HWRRP and the LWRP, the objectives and policies of the CRPS, LWRP and HWRRP pre-date the NPSFM 2020. This means that those planning documents were prepared without reference to this national direction. Given that, we cannot rely on the CRPS, HWRRP and LWRP as having 'given effect' to the direction of the NPSFM 2020, including the hierarchy of obligations in the NPSFM's sole objective and definition of Te Mana o te Wai. Given this, we consider it appropriate to carefully have regard to its provisions as we cannot be confident that the lower-order documents give effect to this NPS.
46. In particular, the hierarchy of obligations in the NPS Objective requires the health and well-being of the waterbody and its ecosystem to be put first. The applicant's argument, provided in response to a request for further information, is that

"While the NPS sets a hierarchy of obligations, it does not remove all weight from the second and third order priorities, nor does it make such activities relating to second and third order priorities of lesser validity. This is further emphasised in Policy 15 (Policy 15: Communities are enable to provide for their social, economic and cultural wellbeing in a way that is consistent with this National Policy Statement) and in Appendix 1B – other values that must be considered."

47. A **hierarchy** (in context) is defined as:

*"an arrangement or classification of things according to relative importance or inclusiveness."*⁵.

Given this, to be consistent with this objective we must first ensure that the health and wellbeing of the waterbody and its freshwater ecosystem is achieved. Once that is achieved, it is appropriate to consider whether the health needs of people are met. Only then, once both of those priorities are achieved, should the ability of people and communities to provide for social, economic, and cultural well-beings be considered.

48. The applicant's s92 response implies that applying weight to the second and third priorities, prior to having ensured the first, is consistent with Policy 15 of the NPSFM 2020. We disagree. Policies give effect to their associated objective and Policy 15 of the NPSFM 2020 provides for communities

"...to provide for their social, economic and cultural wellbeing in a way that is consistent with this National Policy Statement" (emphasis added)

⁵ <https://www.lexico.com/definition/hierarchy>

In applying Policy 15 it is therefore appropriate to provide for social, economic, and cultural well-beings, but only once a decision maker is satisfied that first two matters in the hierarchy expressed in the objective are achieved.

49. In this instance, the proposed diversion, almost 52 times larger than the consented take of water, would reduce flows in the main channel of up to 3-cumecs, including at periods of low-flow. The applicant argues that this will not happen most of the time, and that the diversion is more likely to be 0.5 cumecs at low flows. While this may be the case, the applicant has not proposed to reduce the size of diversion at periods of low-flow to address potential adverse effects on the river and we must consider the potential impact of diverting the full 3-cumecs, which is consistent with the hydrological assessment provided.
50. The applicant also notes that most of the diverted water (i.e. excepting the c. 57 L/s taken for irrigation) will remain within the mainstem of the river. While we accept that the diversion will not deprive the mainstem of the river of the entire 3-cumecs sought to be diverted, it will still reduce flows in a c. 560m long reach of the main source channel while it is occurring. As noted above, Mr Arthur's technical advice also highlights other potential adverse effects of this proposed diversion on the wider river environment including increased risk of algal blooms, drying in source braids and reduced habitat availability.
51. In Ms Sabu's s42A report, she compares the applicant's assessment of hydrological flows to risk assessment guidelines (Draft Guidelines for the Selection of Methods to Determine Ecological Flows and Water Levels, Ministry for the Environment, 2008). The assessment indicates that flows less than 15-cumecs could result in a "moderate risk" to fish species such as the torrentfish. Mr Jarred in his technical memorandum has also identified that the riffle habitats on the true right of the river are important for a range of aquatic invertebrates and fish species including the torrentfish (which has a – threatened classification of 'At risk – declining).
52. The applicant's response to the s42A report argues that there will be no loss of river values resulting from the proposal. The assertion appears to be based (at least in part) on the statement that 3-cumecs is unlikely to be diverted at all flows, and that effects will therefore be less than suggested by Mr Arthur's technical advice. As noted however, we must consider the effects of what is *proposed*, i.e. the effects of diverting 3-cumecs, not what might happen.
53. The applicant has not provided any expert evidence to rebut the advice from Mr Arthur around the potential adverse effects of diverting 3-cumecs from the main channel. We therefore accept Mr Arthur's advice that adverse effects may occur as a result of the diversion. While those effects may be of a "minor" level as concluded by the s42A officer, that is not the same as no effects, or *de minimis*, effects.
54. Policy 7 of the NPSFM 2020 directs that "*loss of river extent and values is avoided to the extent practicable*".
55. **Loss of value**⁶, in relation to a river, is specifically defined in the NPSFM 2020 as the river:

"...being less able to provide for the following existing or potential values:

 - "(a) any value identified for it under the NOF process; or*
 - (b) any of the following, whether or not they are identified under the NOF process:*

⁶ NPSFM 2020 sub-part 3.21

- (i) *ecosystem health*
- (ii) *indigenous biodiversity*
- (iii) *hydrological functioning*
- (iv) *Māori freshwater values*
- (v) *amenity*"

56. While what is practicable is undefined in the NPSFM 2020, the NPSFM 2020 also required policies to be inserted into regional plans – specifically what that has become policy 2A.4 in the HWRRP and the LWRP.

57. Policy 2A.4 of the HWRRP (and LWRP) states:

“Policy 2A.4

The loss of river extent and values is avoided, unless the council is satisfied:

(a) that there is a functional need for the activity in that location; and

(b) the effects of the activity are managed by applying the effects management hierarchy.”

58. These policies refine how Policy 7 should be applied and, as they were required to be inserted into regional plans by the NSPFM 2020, must be intended to ‘give effect’ to that national direction. Therefore, unless there is a functional need, then loss of river extent and values should be avoided in the first instance.

59. **Functional need** is defined in the NPSFM 2020 as:

“the need for a proposal or activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment.” [emphasis added]

60. The Environment Court in *Te Rūnanga o Ngāti Awa v Bay of Plenty Regional Council*⁷, recognised that while a functional need is often obvious for infrastructure, it can be complex when dealing with other activities where there is a less sharply defined functional versus operational requirement. In practice, whether there is a functional or operational need for an activity will depend on the specifics of the proposal including why the project is being undertaken at that location. Where it is technically possible that an activity can occur elsewhere, but technical, logistic or operational reasons mean it is preferred for the activity to occur at the location (e.g. issues of cost, land ownership), there is no functional need. Rather, these are operational matters.

61. In this instance, the reason for the proposed diversion is to provide water for the take and use permit (CRC203518). For there to be a functional need for this diversion, we must therefore consider whether this is the only means of providing water to that consent.

62. While policy 2A.4 of the HWRRP (and LWRP) was not directly addressed by either the applicant or s42A officer, we do note that the applicant was requested to assess functional need for this diversion, as part of the s92 request for further information. The response is summarised in paragraph 182(b) of the s42A report. The applicant concludes that no other location was suitable for the proposed activity due to a preference to have the point of take (which the proposed diversion would feed) as close as possible to the irrigation area and due to potential

⁷ *Te Rūnanga o Ngāti Awa v Bay of Plenty Regional Council* [2019] NZEnvC 196

access issues. The s42A officer concludes that these are likely to be operational requirements rather than functional requirements.

63. We note that Rule 2.3 of the HWRRP, the applicable rule to the diversion, has consideration of alternative sources of water as a matter of discretion. The applicant has concluded that no other source of water is available. In the context of this proposal however, the purpose of the diversion is to provide water for an unexercised take and use consent (CRC203518). The 'source of water' is where the water supply for existing take and use permit could be derived. In this instance, the existing channel, from which the diversion is to be made is one possible 'source'. Other sources could include a gallery, as was proposed by the original application for CRC203518, or an alternative take point (for CRC203518) to which no diversion is required. These alternatives have been brought to our attention as part of the s42A report and associated appendices but there appears to have been no comprehensive assessment from the applicant to demonstrate why these are not viable alternatives, and therefore why this diversion is 'functionally' required (as opposed to operationally preferred).
64. We are also not convinced that the size of the proposed diversion, relative to the c. 57 L/s take, is justified. The argument provided by the applicant that we should consider that the diversion is more likely to be around 0.5-cumecs at lower flows (and that therefore the adverse effects are likely to be less than assessed) appears to undermine the requirement for a 3-cumec diversion, as it indicates that a lower flow may be adequate to provide for the take and to maintain fish passage down the re-watered braid.
65. As we are unable to conclude that the proposed diversion is functionally required, the first arm of policy 2A.4 of the HWRRP and LWRP is not met, and loss of river (extent and) values should simply be avoided. The Supreme Court has emphasised the importance of language and identified that the term avoid is a strong directive⁸ to prevent something from occurring.
66. In the absence of a demonstrated functional need the second arm of policy 2A.4 (where consideration is given to the effects management hierarchy, including how effects can be remedied, mitigated or offset) is not triggered.

Conclusions

67. While we note the applicant's argument that the take and use of water (CRC203518) proposed to be supplied by this diversion is already granted, this proposal for a diversion and works in a riverbed must be considered on its own merits.
68. We acknowledge that the current operative plans, the HWRRP and LWRP, were developed with community input and gave effect to the NPSFM 2011 and NPSFM 2014 respectively. They do not give effect to the NPSFM 2020 hierarchy of obligations, except for the incorporation of Policy 2A.4 of both the HWRRP and LWRP, which states that loss of extent and values should be avoided unless there is a functional need for the activity.
69. As a later-in-time piece of national direction with a hierarchy of obligations, we have given significant weight to the NPSFM 2020. While it must be 'given effect' to in the next generation of regional council land and water plans, we must have regard to the hierarchy of obligations, which put the health and wellbeing of the waterbody first, now. Only once that, and human health, are provided for should social, economic, and cultural well-beings reliant on freshwater

⁸ *Environmental Defence Society of New Zealand v The New Zealand King Salmon Company Ltd* [2014] NZSC 38

be considered. The directive policies inserted into the operative HWRRP and LWRP to avoid loss of extent and values except where there is a functional need are consistent with achieving that hierarchy.

70. As discussed above, we are not convinced that there is a functional need for the proposed diversion. The limited discussion of functional need in the applicant's s92 response provided operational not functional reasons for the choice. We note from the publicly available application for CRC203518 that a gallery was originally proposed as the source of that take and we note that this was also suggested to the applicant as an alternative to the diversion by CRC staff. No evidence has been provided to demonstrate why that (or any other) alternative to supply the take is not viable. As noted above, whatever decision is reached on this application will not change the existing take and use consent, and that alternative means of providing water to that take are likely to be available, albeit perhaps at a greater cost.
71. The scale of the proposed diversion relative to the size of the take has not been justified. In fact, the applicant argues in some of their further information that it would be more appropriate to consider the effects of a smaller diversion of 0.5 cumecs (at low flows) as this is more likely to occur. This implies that a smaller diversion than applied for may be sufficient to supply the water required, but we have not been presented with information on that point. Regardless, contrary to the applicant's suggestion that we could consider the effects of a smaller diversion, we are required to consider the effects of the 3-cumec diversion proposed. Furthermore, even if we were to impose conditions limiting the size of the diversion at low flows, we consider these would be impracticable to implement given the changeable nature of a braided river system.
72. Ultimately, on that basis of the evidence before us, we are satisfied that:
 - a. While positive effects may accrue to the applicant (and possibly to the backwater environment) if granted;
 - b. the residual adverse effects (including potential adverse effects), and associated loss of river values, of the proposed diversion of 3-cumecs and associated excavation and disturbance of the bed on the wider Hurunui river (as outlined in Mr Arthur's uncontested technical advice) will not be avoided; and
 - c. granting this application would therefore be contrary to the policy direction of NPSFM 2020, and its objective to put the health and well-being of waterbodies (the first priority) before economic, cultural and social considerations (the third priority) as there is no demonstrated functional need for the activity to occur in the manner proposed.

Decision

73. it is our decision, under delegated authority on behalf of the Canterbury Regional Council pursuant to section 104, to **REFUSE** Mr P D and & Mrs P A Davies the following resource consents:
 - I. Land Use
 - II. Water permit

Dated at Christchurch this day of 10 November 2021

Decision-makers



Judith Earl-Goulet

General Manager – Regulatory Services



Yvette Rodrigo

Principal Consents Advisor



Philip Burge

Principal Consents Advisor

Appendix: