

Submission: Waikato Regional Council's Proposed Healthy Rivers/Wai Ora Plan Change 1 (PPC1)

Submission on a publicly notified proposed Regional Plan prepared under the Resource Management Act 1991.

Submitting On: The Waikato Regional Council's Proposed Healthy Rivers/Wai Ora Plan Change 1 (PC1)

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Submission

I have reviewed Waikato Regional Council's Proposed Healthy Rivers/Wai Ora Plan Change 1 (PPC1) and **oppose** the Plan Change in its current form.

I could not gain an advantage in trade competition through this submission. I will be directly affected by adverse effects that will result if the Proposed Waikato Regional Plan Change 1 becomes operative in its current form. These adverse effects do not relate to trade competition or the effects of trade competition as defined by the Resource Management Act 1991.

I do not wish to be heard in support of this submission.



6 March 2017

Signature

date

Thank you for the opportunity to submit on the Waikato Regional Council (WRC)'s Proposed Plan Change 1 (PPC1).

My name is Tricia Balle and I am a landowner in Pukekawa in subcatchment 9 (currently withdrawn). We have owned this 5.4-hectare 'lifestyle' block since 2004. Its topology ranges from flat (about 5 acres) to rolling to steep and has two main streams running through it.

We currently run one horse and a few sheep (< 10) on the flat areas, and about 6 heifers (weaners raised to finished) on the rest.

When we bought the block, it was grazed by sheep and cattle who had free access to the streams. Any bush remaining on the property was remnant and struggling. We immediately fenced off the majority of the streams using temporary fencing, kept the sheep away from any temporary fenced paddocks and ran small heifers only in the newly fenced areas to protect the streams and also the steeper slopes. We spent a good deal of money and time on planting out part of the now-ungrazed banks in natives.

The property is not economically viable. The funds raised from the cattle barely cover the rates. The ongoing time spent in the attempts to keep gorse, thistle, blackberry and other weeds out of the paddocks is significant. The areas that have been fenced off from grazing do not stay pristine and free of weeds. Native trees don't spontaneously grow in areas where there are no seeds in the ground. Gorse and blackberry, however, are happy to take advantage. The temporary fencing we installed over ten years ago requires constant upkeep, and paying for permanent fencing on this undulating property is an expense we cannot currently afford. I have a full-time job so all work on the property occurs in my 'free' time.

I feel we have done the right thing on this property since moving here. Our first instinct was to exclude the stock from the waterways. We have tried to keep heavy animals off steep slopes to avoid erosion. We have encouraged the regrowth of manuka and any other natives that do happen to self-seed on the hillsides. This all takes time and money. Our longer-term plan was to complete the fencing as funds allowed, gradually plant all the banks of the streams, and try to make the property easier to manage in terms of grazing the cattle. We had looked into covenanting part of the area as a wetland. (As a regular user of the Waikato River as a rower, I fully support the need for clean rivers, and in fact I have no current issues with the water quality at Mercer.)

Through PC1, the WRC will now become involved in our property's management. We will have to pay thousands of dollars to a consultant to come up with a farm plan. The direction to keep stock off steeper slopes means that we will have to somehow allocate funds for more fencing and spend yet more time and money planting slopes and fighting weed growth. This will inevitably have the effect of decreasing the value of the property since it will be hard work for any landowner. This property is our main asset and has many other pressing issues, and funding is tight. The proposed PC1 plan change is creating additional stresses and uncertainties.

I thus request that the WRC reduce the burden on such smaller lifestyle blocks with no commercial activity by reducing the requirement for a full FEP once a review has deemed the property to be a low source of discharge into any waterways. I also strongly request that the WRC change the requirement to fence off slopes over 15 degrees. Finally, if the WRC do create the mandate to fence and plant significant areas of land, I request that they provide financial support to enable landowners to do so. Without resources, areas that are fenced off and left alone will rapidly revert to gorse and weeds and both the local rural community and the region as a whole will suffer as a result.

More generally, I feel that the current blanket approach to regulation proposed in PC1 is inherently unfair and that a sub-catchment approach should be taken to identify and remedy the highest sources of discharge and pollution as a priority. Imposing large financial and commercial penalties on landowners and farmers who are a priori not a source of discharge into the waterways is entirely unjustifiable. In the medium to long term this could lead to lower and/or more expensive food production, both regionally and nationally, at a time when huge focus is being placed on the need for cheap, locally-produced and good quality food for the growing population. And finally, until the withdrawn Hauraki region is reintegrated with the whole, PC1 should be withdrawn. This is again an issue of fairness.

The table below gives the details for the specific provisions of the proposal that this submission relates to and the decisions it seeks from Council. The outcomes sought and the wordings used are suggestions only; where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan, including Objectives, Policies, or other rules, or the restructuring of the Plan, or parts thereof, to give effect to the relief sought.

No.	Section number of the Proposed Plan Change 1	Support/ Oppose	Submission	Decision sought
3.11.2 Objectives				
4.1	Objective 1 Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	Support with amendments	<p>Support the intention of Objective 1.</p> <p>Oppose the attribute targets set in Table 3.11-1. The attribute targets are too prescriptive and should align with the National Policy Statement for Freshwater Management (NPS-FM) and Waikato River Authority's (WRA) Vision and Strategy.</p> <p>Objective 1:</p> <ul style="list-style-type: none"> • Does not consider all contaminant sources holistically • Includes flood/high flow conditions in water quality target data which should be considered outliers • Does not take into consideration the variability associated with sub-catchments, i.e., climate and soil type 	<p>Retain the long-term restoration and protection of water quality for the Waikato and Waipa rivers.</p> <p>Amend PC1 to be holistic and include all sources influencing the health and wellbeing of the Waikato River and its catchments, for example, koi carp, point source discharges, and hydro-dams.</p> <p>Remove flood/high flow conditions from water quality target data.</p> <p>Address contaminants on a sub-catchment basis, to enable targeting of the highest omitting sub-catchments.</p>
4.2	Objective 2 Social, economic and cultural wellbeing is maintained in the long term	Support with amendments	<p>Support maintaining the long-term social, economic and cultural wellbeing; this must be a foundation objective in PC1.</p> <p>However, PC1 does not achieve Objective 2 because:</p> <ul style="list-style-type: none"> • The section 32 analysis is incomplete due to the withdrawal of the Hauraki iwi area. • Inadequate social modelling conducted. • Compliance costs alone are likely to cost us over \$5000. • WRC have stated they currently have no known means of robustly measuring social, economic or cultural wellbeing. 	<p>Retain the maintenance of long-term social, economic and cultural wellbeing in the Waikato and Waipa catchment communities.</p> <p>Withdraw PC1 until the Hauraki Iwi area and the WRA's Vision and Strategy has been amended. Then conduct a section 32 analysis to investigate the revised impact PC1 could have on society and economy.</p> <p>Amend rules in PC1 to remove NRP to align with intention of Objective 2.</p> <p>Enable appropriate mitigation strategies to be adopted in the context of</p>

				<p>water quality gains to be made, through a tailored Farm Environment Plan (FEP) to align with intention of Objective 2.</p> <p>Address contaminants on a sub-catchment basis, to enable targeting of the highest omitting sub-catchments to align with intention of Objective 2.</p> <p>Develop robust indicators to measure social, economic and cultural wellbeing.</p>
4.3	<p>Objective 3 Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit</p>	Support with amendments	<p>Support reducing the diffuse discharges in the short-term by 10% of the overall long-term 80-year water quality targets.</p> <p>However, there is a lack of scientific data to support PC1 to achieve Objective 3. For example, PC1 incentives high emitters.</p> <p>This appears to promote the opposite effect of what PC1 should be aiming to achieve to improve the health and wellbeing of the Waikato and Waipa rivers.</p>	<p>Retain a 10% achievement of the long-term water quality targets set out in PC1 by 2026.</p> <p>Amend rules in PC1 to remove the NRP.</p> <p>Adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.</p> <p>Enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP.</p>
4.4	<p>Objective 4 People and community resilience</p>	Support with amendments	<p>Support people and community resilience – this must be a cornerstone objective in PC1.</p> <p>However, currently PC1 does not meet the requirements of Objective 4. The proposed rules undermine community resilience in the rural communities of the Waikato and Waipa catchments and will adversely impact on social and economic wellbeing in both the short term and long term. The NRP, associated farm devaluation and loss of flexibility, coupled with substantial compliance and mitigation costs on many farms, is unsustainable, as</p>	<p>Retain the staged approach.</p> <p>Amend rules in PC1 to remove the NRP and land use change restriction.</p> <p>Adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.</p> <p>Enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP.</p>

			evidenced by case studies. Water quality already meets attribute targets in the majority of these sub-catchments. Despite this, no benefit is awarded to low emitters who may be forced off their land through unsustainable financial impacts imposed by PC1. This will in turn undermine the rural communities of the Waikato and Waipa catchments, as detailed in Objective 2.	
3.11.3 Policy				
4.7	Policy 1 Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	Support with amendments	<p>Support managing water quality on a sub-catchment basis because it considers soil suitability and climate conditions.</p> <p>Support stock exclusion, however, only where it is practical to do so and is relevant to water quality benefit gains.</p> <p>Support enabling low intensity land uses.</p> <p>Support moderate to high producers of contaminant discharges to reduce their discharges by appropriate mitigation strategies through a tailored FEP.</p> <p>However, the rules in PC1 do not reflect Policy 1 and 9.</p> <p>Oppose mandatory fencing in areas where slopes are over 15°. This requirement is unjustified, does not align with proposed amendments to the NPS-FM, and is financially unsustainable for the majority. Increased erosion risk and sediment loading in water-bodies would result from constructing fences over 15°.</p> <p>Request that funding is provided to assist landowners to implement any mandated fencing or planting as a result of the requirements to manage discharges.</p>	<p>Retain managing diffuse discharges and water quality on a sub-catchment basis.</p> <p>Enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP.</p> <p>Amend rules in PC1 to reflect Policy 1 and 9.</p> <p>Amend Policy 1 in PC1 to state (changes are red): c. Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs. d. Requiring farming activities on slopes exceeding 15 degrees (where break feeding does not occur) to manage contaminant discharges to water bodies through mitigation actions that specifically target critical source areas.</p> <p>Require clarification on how slope is measured given the ranges of topography experienced within each paddock and adjoining watercourses.</p> <p>Provide subsidies to farmers (especially smaller</p>

				noncommercial landowners) to implement costly changes such as FEPs, fencing and plantings, as well as ongoing weed control.
4.8	Policy 2 Tailored approach to reducing diffuse discharges from farming activities	Support with amendments	<p>Support a tailored, risk based FEP, allowing appropriate and tailored mitigations to reduce diffuse discharges.</p> <p>Support the reduction of diffuse discharges throughout all sub-catchments, but only where applicable, i.e., if the sub-catchment is well below all attribute targets then maintenance would be appropriate.</p> <p>Oppose an NRP because an uncertain, estimated number based upon nitrogen only should not govern land management. An FEP (if appropriate) would provide transparency and confidence to Waikato Regional Council, and the wider community, that the property is reducing, or maintaining where applicable, its diffuse discharges relative to all four contaminants.</p>	<p>Retain appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP.</p> <p>Amend PC1 to reflect Policy 1 in adopting a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.</p> <p>Amend rules in PC1 to remove the NRP.</p>
4.9	Policy 4 Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	Support with amendments	<p>Support enabling low intensity land uses.</p> <p>However, I consider the uncertainty surrounding 'future mitigation actions' to be unacceptable. The level of capital expenditure required to meet the 10-year plan without assurance of future compliance for many farmers is prohibitive and counterproductive. If best practice is being adopted, then future certainty should be provided.</p>	<p>Retain provisions allowing for low intensity land uses to continue and establish.</p> <p>Remove any signalling of future mitigation action requirements from Policy 4 in PC1</p>
4.10	Policy 5 Staged approach	Support with amendments	<p>Support an 80-year staged approach to achieve the long-term water quality targets.</p> <p>However, Policy 5 does not support Objective 2, 4 and 5 because it does not:</p> <ul style="list-style-type: none"> Minimise social disruption 	<p>Retain the staged approach.</p> <p>Amend rules in PC1 to remove the NRP.</p> <p>Adopt a sub-catchment management approach to</p>

			<ul style="list-style-type: none"> Allow for innovation and new practices to develop Support prosperous communities <p>There is little scientific evidence that PC1 will reduce diffuse discharges to achieve the long-term water quality targets.</p>	<p>ensure collaborative and fair management of resources within each sub-catchment.</p> <p>Enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP where appropriate.</p>
4.11	Policy 6 Restricting land use change	Oppose	<p>Oppose restricting land use change based on the type of land use, as it is a blunt tool. This Policy, and related rule (3.11.5.7), will inhibit growth and innovation within the Waikato region and nationally because farmers will be unable to adapt to market demands/changes. Land use flexibility is key to running sustainable business operations. Therefore, Policy 6 conflicts with Objective 2, 4, 5 and Policy 5.</p> <p>Where a sub-catchment is of high priority (in terms of water quality), land use change should be a restricted discretionary activity status. However, where a sub-catchment is of low priority, land use change should be a permitted activity.</p>	<p>Amend PC1 to state high priority sub-catchments, in relation to water quality, and create a Restricted Discretionary activity status. Low priority sub-catchments to have a Permitted activity status.</p> <p>Amend PC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment. Then enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP</p>
4.12	Policy 7 Preparing for allocation in the future	Support with amendments	<p>Support as it takes into account land suitability regarding diffuse discharge reductions.</p> <p>However, PC1 is severely restricting growth and innovation on my property and in my community while taking more time to gain scientific data to appropriately implement this Policy in the future.</p> <p>WRC needs to work collaboratively with stakeholder groups to develop a sub-catchment management approach and enable appropriate mitigation strategies through a tailored FEP.</p>	<p>Retain reducing diffuse discharges while considering land suitability.</p> <p>Enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP.</p> <p>WRC to work collaboratively with stakeholder groups to develop sub-catchment management approach.</p>
4.13	Policy 8 Prioritised	Support	Support prioritising sub-catchments and implementing	Retain as proposed.

	implementation		at different stages.	
4.14	Policy 9 Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	Support with amendments	Support managing water quality at a sub-catchment level. However, the rules in PC1 should give effect to this Policy and enable appropriate mitigation strategies through a tailored FEP.	Retain managing water quality on a sub-catchment level. Amend the rules in PC1 to reflect Policy 1 and 9. Enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP.
4.15	Policy 10 Provide for point source discharges of regional significance	Support with amendments	Support considering the regional significance of infrastructure and industry because there are certain point source discharges that are vital to human health and wellbeing. However, point source discharges should be taken into consideration for achieving the short and long-term water quality targets, through a sub-catchment approach.	Retain the consideration of regional significance of point source discharges infrastructure and industry. Amend PC1 to be holistic and include all sources influencing the health and wellbeing of the Waikato River and its catchments, including koi carp, point sources, and hydro-dams. Adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.
4.16	Policy 11 Application of Best Practicable Options and mitigation or offset of effects to point source discharges	Support with amendments	Support applying Best Practicable Options. However, there is no one set of Best Practicable Options applicable to all stakeholders, and there are no specific rules to reflect this Policy in PC1.	Retain applying Best Practicable Options but amend to include all stakeholders, e.g., through FEP. Provide clarification for what is a "significant toxic adverse effect". Amend rules to reflect Policy 11.
4.17	Policy 12 Additional considerations for point source discharges in relation to water quality targets.	Support with amendments	Support considering past technology upgrades and costs associated with upgrading. However, this consideration is not consistent with the options open to all other landowners such as us. Point source dischargers can stage future mitigations to spread innovation costs over time to allow for a return in investment. This is not the	Retain considering past technology upgrades and costs associated with upgrading. Adopt a sub-catchment management approach to ensure collaborative and fair management of resources within the region. Amend PC1 to allow these considerations to occur across all sources

			<p>case for me as a landowner.</p> <p>There is also no regard to cumulative effects from point source discharges.</p>	<p>influencing the health and wellbeing of the Waikato and Waipa rivers. This could be achieved by enabling appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP.</p>
4.18	Policy 13 Point sources consent duration	Support with amendments	<p>Support considering the magnitude and significance of the investment made.</p> <p>However, landowners should be provided the same consideration when applying for consent under rule 3.11.5.4, 3.11.5.5, 3.11.5.6 and 3.11.5.7 in PC1.</p>	<p>Retain consideration of the consent duration in relation to the magnitude and significance of the investment made.</p> <p>Adopt to include all property owners and enterprises within the Waikato and Waipa Catchments.</p>
4.22	Policy 17 Considering the wider context of the Vision and Strategy	Support with amendments	<p>Support applying policies and methods based on the Vision and Strategy.</p> <p>However, the WRA's Vision and Strategy is currently under review; therefore, PC1 may end up inadequately reflecting the Vision and Strategy.</p>	<p>Retain applying policies and methods based on the Vision and Strategy.</p> <p>Withdraw PC1 until the Hauraki Iwi area and the WRA's Vision and Strategy has been amended.</p>
3.11.4 Implementation Methods				
4.23	3.11.4.1 Working with others	Support	Support working with stakeholders to ensure PC1 is implemented effectively.	Retain as proposed.
4.25	3.11.4.3 Farm Environment Plans	Support with amendments	<p>Support a tailored, risk based FEP for a business to improve, or maintain where applicable, environmental standards in a desired timeframe negotiated between the Farm Environmental Planner and the landowner.</p> <p>However, I do not support the requirement for a Farm Environmental Plan in circumstances such as my own where the block of land, though over 4 hectares, is uneconomic and low-stocked. It makes no sense that we have to pay a consultant thousands of dollars while our neighbour with 3.8 hectares does not. Where properties are not commercially run and are clearly not a significant source of discharge into the waterways, a lower-cost alternative should be provided.</p>	<p>Retain a tailored, risk based FEP for larger properties and those sustaining commercial activities.</p> <p>Provide a means for smaller lifestyle blocks (over 4 hectares but commercially unviable) to be inspected then possibly excluded from the need to develop an expensive FEP.</p>

			I understand there could be a shortage of Certified Farm Environment Planners. As an alternative, I suggest that landowners with smaller lifestyle blocks and no commercial activity should be inspected by a planner (who might not need to be fully certified) who can assess the property more quickly and recommend whether or not an FEP is in fact necessary.	
4.27	3.11.4.5 Sub-catchment scale planning	Support with amendments	Fully support managing diffuse discharges and water quality on a sub-catchment level. However, this method is not reflected in the rules of PC1.	Retain managing diffuse discharges and water quality on a sub-catchment level. Amend PC1 to reflect this method in the rules.
4.29	3.11.4.7/8 Information needs to support any future allocation/Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	Support with amendments	Support gaining data. Support allocation on a sub-catchment basis. Oppose future allocation.	Retain gaining data. Amend PC1 to enable the management of diffuse discharges on a sub-catchment basis.
4.30	3.11.4.9 Managing the effects of urban development	Support	Support managing the effects of urban development.	Retain as proposed
4.31	3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	Support	Support implementing best practice guideline to reduce diffuse discharges.	Retain as proposed.
3.11.5 Rules				
4.32	3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	Support	Support enabling low intensity land uses to continue and establish under a Permitted Activity status. Stock exclusion should be in conformance with the proposed amendments to the NPS-FM. Additionally, clarification is	Retain enabling low intensity land uses to continue and establish under a Permitted Activity status. Amend PC1 for stock exclusion: Cattle, horses, deer and pigs are excluded from water bodies in

			<p>required to determine what constitutes slope on land where topography is undulating, and portions of the slope are both under and over the 15° threshold. This is currently subject to interpretation and difficult to implement.</p>	<p>conformance with Schedule C for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs.</p> <p>Provide clarification on how/where to measure slope on undulating land.</p>
4.33	3.11.5.2 Permitted Activity Rule – Other farming activities	Support with amendments	<p>Support that low-intensity land uses that have little to no environmental risk should be under a Permitted Activity status.</p> <p>Support stock exclusion, however, only where it is practical to do so and is relevant to water quality benefit gains.</p> <p>Oppose an NRP because there should not an uncertain, estimated number that controls my ability to manage my land in the way I see fit. An FEP if appropriate would provide a risk based mitigation plan to reduce diffuse discharges.</p> <p>Opposed 3.11.5.2-3b(i), I should not be limited to my stocking rate on my land at 22 October 2016. This is not a true representation of my farming activity and could severely limit my growth and innovation. It also hinders my ability to raise funds to cover the rates for my property and generates additional stress</p> <p>Oppose 3.11.5.4 c, “or grazed” should not be included and cultivation should be allowed up to 25°. Again, it severely limits my growth and innovation. In turn, this will generate an additional load of stress on myself and my community. Overall this undermines Objective 2, 4, 5 and Policy 5.</p> <p>Require clarification around stock exclusion. 3.11.5.2-3e and 3.11.5.2-4e(ii) states a three-metre buffer between</p>	<p>Retain Permitted Activity status for low intensity land uses.</p> <p>Amend PC1 for stock exclusion: Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs.</p> <p>Amend rules in PC1 to remove the NRP.</p> <p>Address contaminants on a sub-catchment basis, to enable targeting of the highest omitting sub-catchments.</p> <p>Enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP.</p> <p>Amend 3.11.5.2 introduction to: The use of land for farming activities (excluding commercial vegetable production) and the associated diffuse discharge of nitrogen, phosphorous, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water where the property area is greater than 4.1</p>

			<p>water body and stock is required. However, in Schedule C the buffer is one-meter, and in Schedule 1 the buffer is based on slope.</p>	<p>hectares, and has more than 6 stock units per hectare but less than 18 stock units per hectare at the 30 June 2016, or is used for arable cropping, is a permitted activity subject to the following conditions:</p> <p>Amend rule in PC1 to remove 3.11.2-3b(i).</p> <p>Amend rule in PC1 to: No part of the property or enterprise over 45 25° slope is cultivated or grazed unless effects of diffuse discharges can be mitigated</p> <p>Provide clarification around stock exclusion requirements, i.e., setback buffers and where to measure setback from on undulating land.</p>
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