

# Submission on the Fast-track Approvals Bill

Uploaded to Environment Select Committee

April 19, 2024

This submission is made on behalf of Irrigation New Zealand in response to the Fast-track Approvals Bill presented under urgency to the House of Representatives on 7<sup>th</sup> March 2024.

Parties that wish to be acknowledged as being signatories to the IrrigationNZ submission: -

- Wairarapa Community Water Storage Project
- Manuherikia and Falls Dam Project
- Mid Canterbury Water Storage Limited (Klondyke), MHV Water, Ashburton Lyndhurst Irrigation

Note: Tukituki Water Security Project will make a separate submission in alignment with IrrigationNZ.

- IrrigationNZ wish to make an oral submission to the Environment Select Committee to support the presentation of our written views to committee members.
- IrrigationNZ understand our submission will be made public through the Parliament website.

**For further inquiries or additional information, please contact:**

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## About IrrigationNZ

Irrigation New Zealand (IrrigationNZ) represents over 3,800 members nationally, including irrigation schemes, individual irrigators, and the irrigation service sector across all regions of New Zealand.

Our irrigator members include a wide range of farmers and growers – sheep and beef, dairy and cropping farmers, horticulturalists, winegrowers, as well as sports and recreational facilities and councils. We also represent over 120 irrigation service industry members – manufacturers, distributors, irrigation design and install companies, and irrigation decision support services for both freshwater and effluent irrigation.

We are a voluntary-membership, not-for-profit organisation whose mission is to create an environment for the responsible use of water for food and fibre production for local and international consumers and to sustain the wellbeing of communities.

As an organisation we actively take a technical leadership role in promoting best practice irrigation and conduct a range of training and education activities associated with freshwater management. Over the last five years, we have trained over 3,000 irrigators on various aspects of irrigation best practices to improve water use efficiency (lowering consumption) and better manage environmental effects (improved soil moisture and surface water management).

IrrigationNZ members share many of the same goals as other New Zealanders:

- Reduce their environmental footprints and see improvements in the health of the natural environment,
- Contribute to the wellbeing of their communities, and
- Provide for a resilient future for New Zealand in the face of climate change.

## Our understanding of the Fast-track Approvals Bill

As part of the coalition government's 100-day plan commitments, the Fast-Track Approvals Bill aims to streamline the consenting process for infrastructure and development projects in New Zealand that have significant regional or national benefits. The Bill aims to consolidate and speed up multiple consenting and permissions processes under various legislation, including the Resource Management Act, concessions and other permissions under the Conservation Act 1987 and Reserves Act 1977, and Environment Court process under the Public Works Act 1981 processes.

Projects can access the fast-track process either by being listed in the Bill or by applying to Ministers for approval. Joint Ministers will decide whether to refer a project to an expert panel, which will assess the project and make recommendations to the Ministers.

The Bill includes provisions to uphold Treaty settlements and specified arrangements throughout the fast-track process.

The purpose and provisions of the Bill take primacy over other legislation in decision-making, allowing approvals to be granted even if they are inconsistent with other laws.

The substantive decision on the application and any conditions required will be made by the joint Ministers, who may seek clarification from the expert panel and additional advice from affected parties.

The Bill also provides for compliance and enforcement functions to be undertaken in line with relevant approval legislation and allows for judicial review and appeals on Ministerial decisions.

## IrrigationNZ General Statements of Principle

### **Endorsement of Fast Track Process:**

IrrigationNZ endorses the Fast-track Approvals Bill in principle, recognizing the urgent need for a streamlined consenting process for critical infrastructure projects. Our organization's primary objective is to ensure that the right infrastructure is built in the right place, with robust community and iwi support and participation, promoting economic growth and stability, while also making sensible decisions regarding natural resource utilization and achieving social resilience outcomes.

The Fast-track Approvals Bill presents a crucial opportunity to expedite the delivery of vital infrastructure projects that will benefit both present and future generations. By streamlining the consenting process, we can overcome bureaucratic hurdles and accelerate the development of infrastructure essential for New Zealand's prosperity and resilience.

Maintaining appropriate community and iwi engagement in the FastTrack process is imperative, ensuring that the voices of relevant and directly affected stakeholders are heard and considered in the rapid decision-making process. Maintaining an inclusive local approach is essential for fostering trust, collaboration, and ownership within local communities, without the vexatious interference of outside groups.

By working collaboratively with the government and supporting the Fast Track process, IrrigationNZ believes we can realize our objectives. Embracing this initiative will unlock the full potential of critical infrastructure projects, driving prosperity, resilience, and sustainability across New Zealand.

### **Weaknesses of the Resource Management Act (RMA):**

We believe the Resource Management Act 1991 (RMA) is no longer fit for its intended purpose of balancing the protection of our natural resources and the infrastructure needs of our society for delivering safe, reliable, and affordable food and natural fibres produced by a resilient and strong primary sector economy.

Over the past 30 years, the RMA and its associated planning documents have been highly amended and manipulated, resulting in an unbalanced approach that has not achieved the intended outcomes for a protected environment, resilient and equitable society, and buoyant, inclusive economy with appropriate infrastructure developments. We believe that the RMA needs to be replaced but only by something that is better, and that this needs an appropriate timeframe to give this due consideration.

The longer-term process of RMA reform is a significant transformation that generates an unavoidable element of unpredictability. Our organization urges the Environment Select Committee to prioritize the creation of certainty within the Fast-track Approvals Bill itself as much as possible.

Certainty and pace are paramount because that permits irrigation schemes and water users to make plans and investments for the future. This includes the ability to facilitate changes in land use, prevent the consequences of drought and flooding, and ensure the sustainable welfare of the land, water, and the living organisms they support, such as native flora and fauna, as well as human life and the food supply.

IrrigationNZ emphasizes that investments in irrigation infrastructure require stability, which can be hindered by uncertain consent durations and the potential for mid-term reviews or changes. To promote business and community planning and development, it is necessary to establish transparent and reliable regulatory frameworks that can adapt to evolving needs with urgency. These frameworks must still strike a balance between flexibility and specificity, local and national perspectives, and the involvement of a variety of a limited pool of directly affected stakeholders. This balance of certainty is essential for ensuring the prosperity of businesses, communities, and the environment.

### **Urgency for Reform:**

The Fast-track Approvals Bill, in the meantime, presents an opportunity for significant progress in infrastructure project decision-making.

In the short term the Fast-track Approvals Bill process is an opportunity to make significant gains on the current RMA and planning restrictions, which should result in a quicker and less impeded framework for infrastructure project decisions and enable our communities to progress.

This is a crucial opportunity in our agricultural history for an ongoing positive and practical contribution to New Zealand's future as a food and fibre producer supported by irrigation.

As all human existence has an environmental impact that will be exacerbated as the population grows, we need to strike a balance in our infrastructure and environmental policies, supported by sound and workable legislation. We believe that the management of New Zealand's natural resources and the related infrastructure to provide reliable water to a multitude of users should take a long-term view, but we need to balance careful planning with a need for rapid decision action.

We believe the irrigation sector's need for additional water storage and distribution infrastructure is well placed to achieve within the Fast-track Approvals Bill make a sensible utilisation of natural resources for community wellbeing as well as safe, healthy, and reliable food, beverage, and fibre production.

## Irrigation Projects for inclusion in the Fast-track Approvals Bill Schedule:

In Annex 1 to this submission, IrrigationNZ details our proposed Irrigation Infrastructure pipeline that targets four strategic projects in Hawkes Bay, Central Otago, Wairarapa, and Canterbury. These projects align with the Fast-track Approvals Bill's objectives and aim to foster economic prosperity, address a comprehensive freshwater management approach, and ensure resilience in drinking and community water supplies.

### Key Fast-track Approvals Bill Submission Points -:

#### **1. Submission Point: Two Year Limitation for Lodging an Approval**

In reference to Clause 24 of the Fast-track Approvals Bill which outlines the notice of joint Ministers' decision on referral application. Subpart (3) specifies that if the decision is to accept all or part of a referral application, the notice must describe the application, state that it has been accepted, provide the Ministers' reasons for acceptance, and set out the matters specified by the Ministers. Importantly, it also mandates specifying the deadline for lodging any approval for all or part of the activity.

In certain cases, the default two-year time frame specified in Clause 24 of the Fast-track Approvals Bill may not be sufficient for an applicant to prepare full application documentation for an irrigation water storage project, even after approval to enter the fast-track pathway is granted by the joint Ministers.

Therefore, IrrigationNZ requests clarification on how situations where the default two-year deadline applies will be managed, particularly when projects require additional time for thorough preparation. Understanding the flexibility and provisions available within the Fast-track Approvals Bill regarding time limits is essential for ensuring that applicants can adequately meet the requirements while delivering high-quality project proposals within the stipulated timeframe.

#### **2. Submission Point: Lapse of consent or designation granted under the Fast-track Approvals Bill**

In reference to Clause 39 of the Fast-track Approvals Bill which introduces another two-year limitation regarding the lapse of a resource consent or designation if it is not given effect by a specified date.

Clause 39 (8) stipulates that the recommendation of the panel must specify the date on which a resource consent or designation lapses unless it is given effect to by that specified date. Clause 39 (9) further elaborates that this specified date must not be later than two years from the date of commencement for a resource consent or from the date on which a designation is included in a district plan.

This limitation affects the ability for implementation of a of irrigation water storage and distribution infrastructure projects where there is likely efficiency in a coordinated sequential pipeline of projects to best utilise a limited pool of engineering expertise and contractor resources rather than be constrained to run projects concurrently. Therefore, IrrigationNZ seeks clarification on the interpretation of this limitation to ensure that irrigation water storage and distribution project applicants have a clear understanding of their obligations and deadlines under the Fast-track Approvals Bill.

#### **3. Submission Point: Achieving Balanced Outcomes in Fast Paced Decisions**

In reference to the Fast-track Approvals Bill in general, but specifically Clause 5, Matters panel must consider. We advocate for balanced outcomes that consider economic, social, cultural, and environmental factors. This approach is particularly relevant for water storage and distribution infrastructure projects, which can offer a range of benefits beyond agricultural productivity, including

recreational opportunities, freshwater management tools, and carbon emissions reduction through enabling land use change.

The Fast-track Approvals Bill aims to expedite the decision-making process for infrastructure and development projects with significant regional or national benefits. While this focus is supported, it's crucial to consider the broader implications and ensure that even locally significant opportunities are addressed.

Mitigations and offsets, such as land swap processes and the establishment of constructed wetlands, or the release of water for environmental flows can contribute to environmental enhancement. Additionally, water storage projects offer recreational opportunities, contribute to overall freshwater catchment management, provide access to water for multiple uses, including drinking water supply, emergency firefighting, industrial water use, and support investments in hydro energy production.

Integration of iwi-owned land into highly productive irrigated farming and growing not only creates employment and training opportunities but also fosters cultural collaboration and economic development.

While agricultural productivity remains a major benefit of such projects, we believe that a comprehensive approach that considers board outcomes within a fast-paced decision process is not only essential but also achievable. By embracing well-structured developments that encompass these elements, we can ensure that infrastructure projects deliver maximum value to both local communities and the broader society, meeting consumer demand and contributing to export markets while safeguarding our natural resources for future generations.

#### **4. Submission Point: Relation to Other Legislation**

In reference to Part 2 Fast-track approval process for eligible projects, Subpart 1—Application of this Part to the approval processes in relation other legislation. The Fast-track Approvals Bill refers to various aspects of resource management and permissions under the Resource Management Act 1991 (RMA), as well as concessions and permissions under the Conservation Act 1987 and Reserves Act 1977. While IrrigationNZ supports this consideration of parallel legislation, we emphasize the importance of an orderly approach to water infrastructure development decisions to enable development and community wellbeing.

One critical aspect highlighted by IrrigationNZ is the potential for land swaps with conservation estates to facilitate infrastructure projects. We believe that such proposals should be viewed as desirable and appropriate, providing opportunities for environmental enhancement while meeting the needs of local communities. However, we caution against allowing spurious or vexatious objections to impede progress.

In some previous consent application cases, infrastructure projects have faced unnecessary barriers due to legal challenges from indirectly affected organizations fundamentally opposed to New Zealand's role as a food producer. These challenges often lack genuine justification of environmental impacts and serve only to obstruct progress rather than address real community needs. As a result, compromises forced upon infrastructure projects may fail to achieve genuine collaboration and progress.

By fostering a collaborative approach that prioritizes those with a genuine local interest in sustainable land and water management, we can ensure that infrastructure projects deliver tangible benefits to the immediately affected communities while safeguarding our natural environment for future generations.

## **5. Submission Point: Locally Significant Projects**

In reference to Clause 17 (2) and (3), significance of projects. We call for careful consideration of locally significant projects to prevent the overemphasis of only nationally or whole of region projects. It's crucial to differentiate between projects with immediate local benefits and those with broader national implications.

The Fast-track Approvals Bill outlines pathways for project consideration, highlighting the need for a clear understanding of the criteria associated with each pathway. As such, IrrigationNZ stresses the importance of transparent criteria that consider a range of factors, including readiness, financial preparedness, community support, economic benefits, iwi active participation, long-term outcomes beyond political cycles, cross-party support, and community wellbeing.

Projects that align with community values and contribute positively to local economies and environments should be prioritized. Overemphasis on perceived impacts can sometimes detract from the localized benefits of infrastructure projects, leading to misunderstandings and misrepresentation of environmental concerns.

## **6. Submission Point: Previously Blocked Projects**

In reference to Clause 17 (2) eligibility for projects. The Fast-track Approvals Bill should address past barriers to project approval, including inconsistent interpretation of government policy into restrictive regional rules in reconsideration of previously blocked projects.

We highlight examples such as the Wakamoekau storage project, which faced obstacles under existing regional resource management rules and the Tukituki water storage scheme that faced procedural barriers under the Conservation Act.

In cases where projects are rejected through the fast-track process, it is crucial to ensure that they are not unreasonably disadvantaged if pursued through the standard RMA application approach. Rejection through the fast-track process should not tarnish the reputation of a project or hinder its prospects for approval through alternative pathways. Fair and transparent processes must be in place to enable rejected projects to be reconsidered without prejudice.

## **7. Submission Point: Composition of Expert Panels**

In reference to Clause 3 (6) (e) membership and relevant expertise of panels. The Fast-track Approvals Bill references the composition of expert panels and the criteria used in project assessment. IrrigationNZ emphasizes the need for a thorough understanding of the significance of strategic freshwater management, the long-term impacts of climate change adaptation, and the flow-on effects to foreign trade.

Expert panels tasked with assessing infrastructure projects must possess the expertise to evaluate the long-term impacts of climate change adaptation. Climate change poses significant challenges to water management, including altered precipitation patterns, increased frequency of extreme weather events, and flood risk. Infrastructure projects must be resilient to these changes and contribute to climate change mitigation efforts.

Furthermore, the assessment criteria should consider the flow-on effects to foreign trade. Infrastructure projects can have implications for New Zealand's export industries, including agriculture, horticulture, and viticulture. It is essential to evaluate how proposed projects may affect international trade relationships and market access.

## **8. Submission Point: Existing Legislation Having Lesser Weight.**

In reference to Clause 1 (2), lesser weight to other legislation. It is essential that expert panels prioritize the purpose of the Bill, which is to facilitate the timely delivery of infrastructure projects with significant benefits for communities. While considerations under existing legislation are important, they should not overshadow the primary objective of the Bill. By giving primacy to the Bill's purpose, the panel can ensure that decisions are aligned with the broader goals of promoting economic development, community wellbeing, and environmental sustainability.

Furthermore, IrrigationNZ acknowledges the provision that panels will be unable to seek wide input from the public on projects. Instead, they will be required to obtain written comments from a limited range of affected parties. We believe that this approach streamlines the decision-making process and prevents undue delays caused by extensive public consultation.

However, this underscores the importance of presenting information to support project inclusion effectively. With limited opportunities for public input, it is crucial that stakeholders provide comprehensive and well-explained submissions to ensure that the panel has all the necessary information to make informed decisions. Clear and detailed presentations of project benefits, potential impacts, and mitigation measures are essential for guiding the panel's assessment process.

## **9. Submission Point: Reporting Back on Applications.**

In reference to Clause 25, the panel must report back to joint Ministers within 6 months of referral. The Fast-track Approvals Bill details the requirements for reporting back on applications for inclusion in the fast-track process. IrrigationNZ acknowledges the provision that requires reporting back six months after the application for inclusion.

IrrigationNZ recognizes that the Fast-track Approvals Bill offers a potentially quicker pathway for project approval compared to the standard RMA process. Despite the inherent challenges and complexities involved in infrastructure decision-making, the fast-track pathway presents an opportunity to streamline the process and expedite project delivery.

While the six-month reporting requirement may not completely eliminate delays, it represents a step towards more efficient decision-making. By providing a structured framework for reporting and assessment, the Fast-track Approvals Bill aims to reduce bureaucratic hurdles and facilitate timely infrastructure development.

## **10. Submission Point: Relationship to Local Authorities<sup>edit 22/04/20024</sup> Government Act**

In reference to Clause 45 (2) (a), specifically the functions, powers, and duties in relation to a resource consent granted under this Act. The Fast-track Approvals Bill addresses compliance and enforcement functions, stating that local authorities will retain these functions concerning RMA notices of requirement and resource consent conditions. This provision raises questions about how the Local Authorities<sup>edit 22/04/20024</sup> Government Act applies, particularly in scenarios involving infrastructure projects like water storage sites, which may intersect with areas governed by the Local Authorities Act, such as paper roads.

Paper roads, often unmaintained or unformed legal roads, are subject to the jurisdiction of local authorities under the Local Authorities<sup>edit 22/04/20024</sup> Government Act.

## **11. Submission Point: Implementation and Finalisation of Consent Conditions Must Be Interactive**

In reference to Clause 45 (1) (a), specifically a resource consent that is granted by a panel. It is crucial to clarify whether there is a process in the Fast-track Approvals Bill that requires the Panel or Joint Ministers to discuss draft conditions with an applicant before they are formalized. As this is a fast-paced process, decided upon by individuals who may not be familiar with the project details, it is essential to ensure that there is a feedback loop prior to consent condition decisions being finalized. While the Bill outlines the referral, decision-making, and implementation processes, the details of engagement with project advocates are not explicitly stated, requiring some reading between the lines.

The Bill does not specifically mention pre-finalization engagement with project advocates, it can only be assumed that all steps to establish the nature of the consent are best informed by the project advocates. This seems analogous to needing a pre-lodgement and negotiated outcome as per a normal RMA consent. This engagement would assist the Ministers to make an initial assessment, and the Expert Panel to provide detailed implementation recommendations.

Additionally, it is worth noting from past experiences, such as the Taitokerau Water Storage Scheme fast track consent process, that the Regional Authority still played a significant role in drafting the actual conditions. Instead, it accelerated the project through the process with rapid decisions, requiring all stakeholders to be actively engaged from the outset. Taitokerau Water experience highlights that some of the environment management plans imposed were onerous and could have benefited from a more measured assessment of conditions before their finalisation. This underscores the importance of ensuring thorough engagement and assessment before finalizing consent conditions.

## **12. Submission Point: Potential for Judicial Review to Impede Progress**

In reference to Clause 2 (4) (c) judicial review proceedings. We express concerns about the potential for judicial review to impede project progress. Clarity is needed on how the provisions within the Bill will manage lengthy litigation processes that could hinder infrastructure development.

IrrigationNZ acknowledges the importance of providing avenues for legal recourse and appeal. However, it's essential to address concerns regarding potential challenges from external parties, as exemplified by the Rautaniwha case, which proceeded to the Supreme Court on a matter of law related to a Department of Conservation (DOC) land swap.

Despite the provisions outlined in the Fast-track Approvals Bill, it remains unclear how the Bill prevents exploitation of ambiguities to mount challenges against infrastructure projects, particularly those involving contentious issues such as land swaps or conservation considerations that may be frivolous or vexatious. This may involve clarifying the criteria for judicial review and appeals, strengthening provisions to deter meritless litigation, and enhancing transparency in decision-making processes.

## **13. Submission Point: Engagement With Relevant Iwi, Hapū, Treaty Settlement Entities**

Referencing Clause 16 of the Fast-track Approvals Bill. This outlines consultation requirements for approvals under the Act, mandating engagement with relevant iwi, hapū, Treaty settlement entities, and other pertinent groups. While acknowledging the importance of this engagement, IrrigationNZ emphasizes the complexity and magnitude of the task for individual project proponents, particularly concerning iwi engagement.

It is essential to recognize that engaging with iwi and hapū, especially regarding Treaty of Waitangi settlement issues, is a significant undertaking that requires expertise, resources, and te Ao Māori sensitivity. However, expecting individual private entities to undertake this task without the partnering of the Crown could place an undue burden on project proponents and potentially undermine the effectiveness of the consultation process.

Therefore, IrrigationNZ submits that the obligation to engage with iwi, hapū, and Treaty settlement entities should not solely devolve to individual private entities. Instead, there should be a collaborative approach involving the Crown to support and facilitate meaningful engagement with iwi and hapū, particularly in cases involving previously resolved or yet-to-be-resolved Treaty settlement issues.

## Conclusion

IrrigationNZ appreciates the opportunity to contribute to the Fast-track Approvals Bill submission process.

Clear and decisive action is necessary to uphold the objectives of the Bill, promote economic growth, and ensure the efficient delivery of infrastructure projects for the benefit of communities and the environment.

We believe that the Bill presents a crucial opportunity to address the shortcomings of the current legislative framework and facilitate the efficient delivery of infrastructure projects with significant benefits for communities.

We urge the Environment Select Committee to consider our submission points and work towards creating a legislative framework that fosters sustainable development while ensuring the prosperity of businesses and communities.

## Annex 1: Inclusion of Irrigation Infrastructure Projects in Schedule 2 of the Bill

Our proposed Irrigation Infrastructure pipeline targets four strategic projects in Hawkes Bay, Central Otago, Wairarapa, and Canterbury.

These projects align with the Fast-track Approvals Bill's objectives and aim to foster economic prosperity, address a comprehensive freshwater management approach, and ensure resilience in drinking and community water supplies.

### **Background to the Irrigation Infrastructure project pipeline:**

New Zealand's primary production-based economy relies heavily on water resources, particularly for irrigation. However, underinvestment in water assets and cumbersome consenting processes have hindered the development of critical infrastructure projects. Climate change impacts, geopolitical constraints, and rising demand for sustainable food production underscore the urgent need for strategic focus on water assets.

Consenting processes have become litigious and complex, impeding new activities and infrastructure development. Challenges related to ownership, consenting, and funding need resolution, while ensuring equitable representation of iwi and hapu in water infrastructure projects.

IrrigationNZ advocates for a unified approach to address water needs across regional New Zealand, fostering community wellbeing and aligning with government policy. Our strategy emphasizes collaboration, feasibility, and multi-purpose infrastructure development to maximize benefits for communities and the environment.

By integrating water capture and storage initiatives with multiple-use benefits, we can enhance economic prosperity, improve water quality, and build community resilience.

IrrigationNZ is pleased to submit the following list of projects for inclusion in Schedule 2 of the Fast-track Approvals Bill.

These projects have been carefully selected based on their strategic importance in addressing water security challenges, fostering economic growth, and enhancing community resilience across regional New Zealand:

**A. Tukituki Water Security Project:** The Tukituki Water Security Project is the most ready to undertake implementation but is subject to reconsideration of the DOC land concession ruling. This project aims to enhance water availability and reliability in the Tukituki River catchment and downstream productive areas. By implementing water storage and distribution infrastructure, this project will support sustainable agricultural practices, improve water quality, and bolster community resilience against droughts and extreme weather events.

**B. Manuherikia and Falls Dam Project:** The Manuherikia and Falls Dam Project seeks to resolve key structural issues in the existing Falls Dam and at the same time increase its storage capacity to supply the Manuherikia Valley. This initiative will provide critical water resources for agricultural, horticulture and viticulture, industrial, and domestic use, while also mitigating the impacts of climate change and safeguarding natural ecosystems, as well as providing for enhancement of environmental outcomes.

**C. Wairarapa Community Water Storage Project:** The Wairarapa Community Water Storage Project is at a later stage of development but worthy of consideration for a subsequent phase. The project aims to address water scarcity issues in the Wairarapa region through the construction of water storage

infrastructure. This project has wide community support for enabling sustainable land use practices, enhancing environmental sustainability, and promoting economic development in the region.

D. Mid Canterbury Water Storage Limited (**Klondyke Water Storage Project**): The Klondyke Water Storage Project proposes the development of water storage facilities in the existing Canterbury irrigation supply scheme. By capturing and storing water, this project will enhance water security, facilitate agricultural diversification, and create opportunities for community resilience.

[Note: Each scheme proponent organisation has either, endorsed the IrrigationNZ submission or, will be making their own independent submission on the Fast-track Approvals Bill and will provide more detailed information on justification for inclusion in the Schedule in accordance with the template for information issued].

Thank you for considering our submission.

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