



17 September 2018

Chief Executive
Waikato Regional Council
401 Grey Street
Private Bag 3038
Waikato Mail Centre
Hamilton 3240

For: Vaughan Payne, Chief Executive

Email: healthyrivers@waikatoregion.govt.nz

Dear Mr Payne

FURTHER SUBMISSION IN SUPPORT OF SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND PROPOSED VARIATION 1 TO THE WAIKATO REGIONAL PLAN

1. As you are aware, we act for the Waikato Region Territorial Authorities Group ("WARTA") in relation to Plan Change 1 and Variation 1 to the Waikato Regional Plan ("PC1").
2. WARTA is an informal group of the following ten Waikato Region territorial authorities:
 - (a) Waikato District Council;
 - (b) Thames-Coromandel District Council;
 - (c) Hauraki District Council;
 - (d) Matamata-Piako District Council;
 - (e) Hamilton City Council;
 - (f) Waipa District Council;
 - (g) South Waikato District Council;
 - (h) Waitomo District Council;
 - (i) Otorohanga District Council; and
 - (j) Taupo District Council.

3. Although they could be separately represented, these ten TAs have decided to form the WARTA Group as an informal grouping for the purpose of responding to PC1 in respect of the matters of common concern to WARTA members, and particularly for the purpose of enhancing efficiency by:
 - (a) Jointly liaising with the WRC, sector groups and other key stakeholders in relation to the issues arising with a view to achieving resolution on an appropriate resource management framework or, as a minimum, narrowing the issues arising; and
 - (b) Presenting a joint case in relation to the issues of common concern.
4. WARTA Group members support PC1 in principle and agree that it is appropriate that substantive measures be adopted to implement the Vision and Strategy for the Waikato River (Te Ture Whaimana o Te Awa o Waikato). However, WARTA members have two areas of common concern in relation to the potential effects of implementing PC1, which fall into two broad categories as follows:
 - (a) Issues that will be referred to as "rural issues", namely, the potential impact of PC1 on the primary sector and rural communities arising out of the land-use aspects of the plan change to deal with diffuse discharges, including the economic impact on the farming community and the practical workability of PC1.
 - (b) Issues that will be referred to as "urban issues", namely, the potential impact of PC1 on the urban communities within the Waikato Region, particularly in relation to the potential impact on urban growth and other issues relating to point source discharges (such as the restricted scope of offsetting the point source discharges).
5. The WARTA Group's position is that amendments to PC1 are required in order to address WARTA's concerns with respect to the rural and urban issues outlined above.
6. Against that background, please find **enclosed** for filing WARTA's further submission in relation to PC1.
7. Please do not hesitate to contact us should you have any queries.

Yours sincerely



S J Berry | Jen Vella
Partner | Senior Associate

DDI: +64 9 909 7315
Mobile: +64 21 987 095
Email: simon@berrysimons.co.nz

Encl. WARTA Further Submission on PC1

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Proposed Plan Change 1 to the Waikato Regional Plan and Variation 1 to Proposed Plan Change 1

AND

IN THE MATTER of a further submission by **TEN WAIKATO REGION TERRITORIAL LOCAL AUTHORITIES COMPRISING THE WARTA GROUP** under clause 8 of Schedule 1 of the Resource Management Act 1991 to Proposed Plan Change 1 and Variation 1 to Proposed Plan Change 1

TO: WAIKATO REGIONAL COUNCIL

NAME OF PARTIES MAKING FURTHER SUBMISSIONS:

Waikato District Council
Thames-Coromandel District Council
Hauraki District Council
Matamata-Piako District Council
Hamilton City Council
Waipa District Council
South Waikato District Council
Waitomo District Council
Otorohanga District Council
Taupo District Council

**FURTHER SUBMISSION IN SUPPORT OF SUBMISSIONS ON
PROPOSED PLAN CHANGE 1 AND PROPOSED VARIATION 1 TO THE
WAIKATO REGIONAL PLAN**

WARTA Group – further submission

1. This is a further submission in support (in whole or in part) of submissions on:
 - (a) Proposed Plan Change 1 to the Waikato Regional Plan ("PC1"); and
 - (b) Variation 1 to Proposed Plan Change 1 to the Waikato Regional Plan ("V1").

(References to PC1 in this further submission are intended to be read as including a reference to both PC1 and V1.)

2. The further submission is lodged by the following ten local territorial authorities ("TAs"):
 - (a) Waikato District Council ("Waikato DC");
 - (b) Thames-Coromandel District Council ("TCDC")
 - (c) Hauraki District Council ("HDC");
 - (d) Matamata-Piako District Council ("MPDC");
 - (e) Hamilton City Council ("HCC");
 - (f) Waipa District Council ("Waipa DC");
 - (g) South Waikato District Council ("SWDC")
 - (h) Waitomo District Council ("Waitomo DC");
 - (i) Otorohanga District Council ("ODC"); and
 - (j) Taupo District Council ("TDC").
3. The submission is lodged in the name of the listed above **WAIKATO REGION TERRITORIAL AUTHORITIES GROUP** (hereinafter referred to as "WARTA" or "WARTA Group").
4. All members of the WARTA Group exercise functions under the Local Government Act 2002 and the Resource Management Act 1991 ("RMA") within the Waikato Region.
5. All ten TAs comprising the WARTA Group have lodged submissions on PC1 in their own capacity and therefore have the right to appear and be represented in respect of PC1.
6. All ten TAs are also qualified to lodge a further submission in terms of Clause 8(1) of Schedule 1 to the RMA to the extent that they all:
 - (a) Represent a relevant aspect of the public generally; and
 - (b) Have an interest in PC1 greater than the public generally.

Role of the WARTA Group - WARTA Group joint further submission

7. Although they could be separately represented, these ten TAs have decided to form the WARTA Group as an informal grouping for the purpose of responding to PC1 in respect of the matters of common concern to WARTA members, and particularly for the purpose of enhancing efficiency by:
 - (a) Jointly liaising with the WRC, sector groups and other key stakeholders in relation to the issues arising with a view to achieving resolution on an appropriate resource management framework or, as a minimum, narrowing the issues arising; and
 - (b) Presenting a joint case in relation to the issues of common concern.

8. A similar approach was adopted by:
 - (a) A number of Waikato TAs, which formed the Waikato River Municipal Users Group for the purpose of responding to Regional Plan Variation 6 (Water Allocation); and
 - (b) The Joint Working Party, for the purposes of responding to the Waikato Regional Policy Statement.
9. Senior management at the Waikato Regional Council ("WRC") have indicated support for such an approach in relation to PC1.
10. Having reviewed each other's submissions and those of other key stakeholders, these TA's have decided to lodge a single further submission under the "WARTA banner" in relation to matters of common interest in relation to both rural and urban issues as set out below.
11. WARTA does not purport to lodge this further submission as a separate legal entity that requires standing as a submitter under the RMA. Each WARTA Group TA is therefore lodging and pursuing this joint further submission in its capacity as a primary submitter.

WARTA member individual further submissions

12. Some WARTA members have also lodged individual submissions in respect of issues that:
 - (a) Do not relate to the two key issues of common concern outlined below; and/or
 - (b) Relate to those issues, but are more specific and detailed than the approach that can be pursued in a joint further submission of this nature.
13. A number of those TAs intend to lodge a further submission on PC1 that is in addition to the WARTA submission. Care has been taken to ensure that there is no inconsistency between the WARTA further submission (which is necessarily somewhat general in its approach) and the specific TA further submission. Those councils making separate submissions fully support the general WARTA position and the principles reflected in this further submission.

Submissions supported by the WARTA Group

14. The WARTA Group's members support (in whole or in part) the submissions lodged by primary submitters listed in Column 2 of **Appendix A** of this further submission.

Parts of submissions supported by the WARTA Group

15. The particular parts of the submissions supported by the WARTA Group are set out in Column 3 of **Appendix A** of this further submission, with the relevant provision of PC1 listed in Column 1.

Aspects of the primary submission that WARTA seeks be allowed (in whole or part) – WARTA approach

16. WARTA Group members support PC1 in principle and agree that it is appropriate that substantive measures be adopted to implement the Vision and Strategy for the Waikato River (Te Ture Whaimana o Te Awa o Waikato). However, WARTA members have two areas of common concern in relation to the potential effects of implementing PC1, which fall into two broad categories as follows:
 - (a) Issues that will be referred to as “rural issues”, namely, the potential impact of PC1 on the primary sector and rural communities arising out of the land-use aspects of the plan change to deal with diffuse discharges, including the economic impact on the farming community and the practical workability of PC1.
 - (b) Issues that will be referred to as “urban issues”, namely, the potential impact of PC1 on the urban communities within the Waikato Region, particularly in relation to the potential impact on urban growth and other issues relating to point source discharges (such as the restricted scope of offsetting the point source discharges).
17. The WARTA Group’s position is that amendments to PC1 are required in order to address WARTA’s concerns with respect to the rural and urban issues outlined above.
18. The primary submissions on PC1 collectively seek a wide variety of amendments and suggest a range of approaches to achieving the objectives of PC1. WARTA considers that the relief sought by the primary submissions collectively provides sufficient scope to achieve an outcome that would address WARTA Group members’ concerns.
19. In developing its further submission, WARTA has identified the primary submissions that seek relief that WARTA Group members consider may appropriately form part of PC1 as it is ultimately promulgated, and which the WARTA Group supports and wishes to be allowed in whole or in part. WARTA has identified those submissions (and parts of submissions) that it wishes to support, in whole or in part (see below). (The WARTA Group has not sought to oppose any primary submission, in whole or in part.)

20. In doing so, WARTA Group members have been guided by a set of key principles or objectives that WARTA members wish PC1 to achieve. In that regard, the WARTA Group wishes to ensure that PC1 achieves the following:
- (a) Effects based provisions that accommodate sufficient flexibility to change land use activities and provide for multiple land-use opportunities and diversification (including land use intensification in appropriate circumstances), and can be supported by sustainable land management practices.
 - (b) That discharges of all four contaminants will be managed to address the key water quality issues at each location or sub-catchment.
 - (c) An implementation regime:
 - (i) That is certain, practicable, sensible, fair and reasonable in its application; and
 - (ii) Will be applied within realistic, fair and reasonable time frames for reporting and deadlines for compliance.
 - (d) Methods of implementation that are affordable to landowners and communities and minimise potential adverse effects on the social, economic and cultural well-being of communities.
 - (e) That the Nitrogen Reference Point is used in an appropriate manner, having regard to the issues with respect to the use of OVERSEER.
 - (f) An approach which enables the TAs to meet their various responsibilities with respect to renewal of consents for existing municipal discharges and for accommodating urban growth within the region.
 - (g) An evaluation that can satisfy section 32 of the RMA to inform decision-making that the Plan Change and/or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources.
21. WARTA has not reached a final position in terms of which aspects of the broad array of relief sought in the submissions it has supported, as set out in **Appendix A**, that it wishes to be allowed in whole or part. Rather, WARTA intends to refine and determine their position as regards to the final detail of the relief it supports as a result of further analysis and discussions with primary submitters. The primary purpose of the WARTA further submission is to advise those primary submitters of the WARTA Group's intent to engage with them to explore the impact that the alternative proposals will have on the WARTA councils' communities.

Reasons for WARTA Group's support

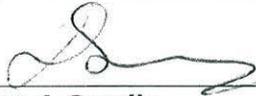
22. The WARTA Group supports the relief sought in the submissions that are supported in whole or in part on the basis that amending PC1 in accordance with that relief would represent the most appropriate provisions in terms of section 32 of the RMA and will promote the sustainable management purpose, and the principles of the RMA.
23. Without limiting the generality of the foregoing, the amendments sought in submission are supported (in whole or in part) for the following main reasons:
 - (a) For the reasons set out in the primary submissions that are supported.
 - (b) The amendments will assist to achieve the principles and objectives supported by WARTA as set out in paragraph 19 above, particularly insofar as they will:
 - (i) Improve the workability, fairness and practical application of PC1;
 - (ii) Will enhance flexibility and reduce the potential adverse social, economic and cultural effects of PC1 of the primary sector and rural communities; and
 - (iii) Will reduce the potential impact of PC1 on the urban communities within the Waikato Region, particularly in relation to the potential impact on urban growth and the cost effective ongoing management of point source discharges.
 - (c) Will assist Waikato Regional Council to carry out its functions under the RMA so as to achieve the purpose of the Act.
 - (d) Will appropriately:
 - (i) Give effect to all applicable higher order planning instruments, including the Vision and Strategy for the Waikato River (Te Ture Whaimana o Te Awa o Waikato), the National Policy Statement for Freshwater Management 2014, all other national policy statements and national environmental standards and the Waikato Regional Policy Statement; and
 - (ii) Not be inconsistent with any directive policies or constraints from such higher order instruments.
 - (e) Will better enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety.
 - (f) Recognise iwi relationships with the Waikato and Waipā Rivers, together with other associated waahi tapu and taonga.
 - (g) Ensure the maintenance and enhancement of amenity values, the intrinsic values of ecosystems and the quality of the environment with respect to the Waikato and Waipā River catchments.

WARTA Group wishes to be heard

24. The TAs which comprise WARTA wish to be heard in support of this further submission and intend to present a joint case at the hearing of submissions on PC1.
25. To the extent that other submitters have made submissions in respect of these issues and have sought relief that WARTA Group members support or conditionally support, WARTA intends to collaborate with other parties involved in the PC1 process.

DATED this 17th day of September 2018

Thames-Coromandel District Council



Sandra A Goudie

Mayor, Thames-Coromandel District Council

Waikato District Council
Hauraki District Council
Matamata-Piako District Council
Hamilton City Council
Waipa District Council
South Waikato District Council
Waitomo District Council
Rotorohanga District Council
Taupo District Council

by their solicitors and duly authorised agents

BERRY SIMONS:



S J Berry / J L Vella

Partner / Senior Associate

Address for service:

C/- Simon Berry
Partner
Berry Simons
PO Box 3144
Shortland Street
AUCKLAND 1140

Telephone: (09) 969 2300

Facsimile: (09) 969 2304

Email: simon@berrysimons.co.nz

Contact person: Simon Berry

APPENDIX A

Submissions supported in full or in part

Plan provision	Submitter	Submission Point ID
General	Otorohanga District Council	V1PC1-431
General	South Waikato District Council	V1PC1-383 - V1PC1-389
General	Watercare Services Ltd	PC1-8454
General	Federated Farmers of New Zealand	V1PC1-778
General	Hancock Forest Management (NZ) Limited	PC1-8933
General	Horticulture NZ	V1PC1-971
General	Horticulture NZ	V1PC1-984
General	Beef + Lamb NZ	V1PC1-1705
General	Beef + Lamb NZ	V1PC1-1706
General	Fonterra Co-operative Group Ltd	V1PC1-746
General	Dairy NZ	PC1-10159
General	Oji Fibre Solutions (NZ) Limited	PC1-8935
General	Ata Rangi 2015 Limited Partnership	PC1-11373
General	New Zealand Forest Owners Association Inc	PC1 – 9952
Full achievement of Vision and Strategy will be intergenerational	Oji Fibre Solutions (NZ) Limited	PC1 -6196
Full achievement of Vision and Strategy will be intergenerational	Miraka Limited	PC1-8759
3.11 Waikato and Waipa River Catchments	Miraka Limited	PC1-8742
3.11.1 Values and uses for the Waikato and Waipa Rivers	Hamilton City Council	PC101-1070
3.11.1 Values and uses for the Waikato and Waipa Rivers	Watercare Services Ltd	PC-8341
3.11.1 Values and uses for the Waikato and Waipa Rivers	Oji Fibre Solutions (NZ) Limited	PC1 - 6316
3.11.2 Objectives	Watercare Services Ltd	PC1-8450
3.11.2 Objectives	Oji Fibre Solutions (NZ) Limited	PC1 - 6364
Objective 1	Federated Farmers of New Zealand	V1PC1-122
Objective 1	Fertiliser Association of New Zealand	PC1 – 9699
Objective 2	Federated Farmers of New Zealand	V1PC1-126

Plan provision	Submitter	Submission Point ID
Objective 2	Fertiliser Association of New Zealand	PC1 – 9700
Objective 2	Oji Fibre Solutions (NZ) Limited	PC1 - 6366
Objective 3	Federated Farmers of New Zealand	V1PC1-129
Objective 4	Federated Farmers of New Zealand	V1PC1-143
Objective 5	Miraka Limited	PC1-8809
3.11.3 Policies	Watercare Services Ltd	PC1-8455
3.11.3 Policies	Federated Farmers of New Zealand	V1PC1-172
3.11.3 Policies	Federated Farmers of New Zealand	V1PC1-175
3.11.3 Policies	Federated Farmers of New Zealand	V1PC1-240
3.11.3 Policies	Hamilton City Council	PC1-10259
3.11.3 Policies	Fertiliser Association of New Zealand	PC1 – 11176
Policy 1	Fertiliser Association of New Zealand	PC1 - 9707
Policy 2	Fertiliser Association of New Zealand	PC1 – 9712
Policy 2	Federated Farmers of New Zealand	V1PC1-164
Policy 3	Federated Farmers of New Zealand	V1PC1-176
Policy 4	New Zealand Forest Owners Association Inc	PC1 – 9956
Policy 4	Hancock Forest Management (NZ) Limited	PC1 - 5608
Policy 5	Federated Farmers of New Zealand	V1PC1-193
Policy 6	Primary Land Users Group	PC1-11152
Policy 6	Hamilton City Council	PC1-10262
Policy 6	Federated Farmers of New Zealand	V1PC1-194
Policy 6	Oji Fibre Solutions (NZ) Limited	PC1 - 6404
Policy 7	Hamilton City Council	PC1-10754
Policy 7	Federated Farmers of New Zealand	V1PC1-224
Policy 7	Oji Fibre Solutions (NZ) Limited	PC1 - 6423
Policy 9	Taupo District Council	PC1-8111
Policy 9	Oji Fibre Solutions (NZ) Limited	PC1 - 6425
Policy 10	Watercare Services Ltd	PC1-8339
Policy 10	South Waikato District Council	PC1-4056
Policy 10	Oji Fibre Solutions (NZ) Limited	PC1 – 6426
Policy 10	Waikato Regional Council	PC1-3061
Policy 11	Watercare Services Ltd	PC1-8122
Policy 11	Matamata-Piako District Council	PC1-3507
Policy 11	South Waikato District Council	PC1-4059

Plan provision	Submitter	Submission Point ID
Policy 11	Oji Fibre Solutions (NZ) Limited	PC1 – 6547
Policy 11	Waikato Regional Council	PC1-3062
Policy 12	Hamilton City Council	PC1-10843
Policy 12	Oji Fibre Solutions (NZ) Limited	PC1 – 6551
Policy 12	Waikato Regional Council	PC1-3062
Policy 13	Hamilton City Council	PC1-11038
Policy 16	Waikato and Waipā River Iwi	PC1-3405
Policy 17	Waikato and Waipā River Iwi	PC1-3406
Policy 17	South Waikato District Council	PC1-4101
3.11.4 Implementation methods	NZ Forest Owners Association Inc	PC1 – 9953
3.11.4 Implementation methods	Oji Fibre Solutions (NZ) Limited	PC1 – 6563
Method 3.11.4.2	Waikato and Waipā River Iwi	PC1-3408
Method 3.11.4.3	Taupo District Council	PC1-8121
Method 3.11.4.3	Waikato and Waipā River Iwi	PC1 – 3409
Method 3.11.4.5	Waikato and Waipā River Iwi	PC1 – 3418
Method 3.11.4.5	Oji Fibre Solutions (NZ) Limited	PC1 – 6929
Method 3.11.4.6	Taupo District Council	PC1-8126
Method 3.11.4.6	Oji Fibre Solutions (NZ) Limited	PC1 - 6939
3.11.4.7	Oji Fibre Solutions (NZ) Limited	PC1 – 6941
3.11.4.12	Fertiliser Association of New Zealand	PC1 – 10615
3.11.5 Rules	South Waikato District Council	PC1-4175
3.11.5 Rules	Federated Farmers of New Zealand	V1PC1-499
3.11.5 Rules	Federated Farmers of New Zealand	V1PC1-570
3.11.5 Rules	Federated Farmers of New Zealand	V1PC1-571
3.11.5 Rules	Federated Farmers of New Zealand	V1PC1-708
3.11.5 Rules	Oji Fibre Solutions (NZ) Limited	PC1 - 7704
3.11.5.1	Federated Farmers of New Zealand	V1PC1-327
3.11.5.1	Fertiliser Association of New Zealand	PC1 – 10618
3.11.5.2	Federated Farmers of New Zealand	V1PC1-338
3.11.5.2	Primary Land Users Group	PC1-11173
3.11.5.2	Fertiliser Association of New Zealand	PC1 - 10621
3.11.5.2	Oji Fibre Solutions (NZ) Limited	PC1 - 8083
3.11.5.3	Federated Farmers of New Zealand	V1PC1-357
3.11.5.3	Oji Fibre Solutions (NZ) Limited	PC1 - 8084

Plan provision	Submitter	Submission Point ID
3.11.5.4	Federated Farmers of New Zealand	V1PC1-468
3.11.5.5	Horticulture NZ	V1PC1-894
3.11.5.5	Federated Farmers of New Zealand	V1PC1-498
3.11.5.6	Federated Farmers of New Zealand	V1PC1-572
3.11.5.6	Oji Fibre Solutions (NZ) Limited	PC1 - 13076
3.11.5.7	Primary Land Users Group	PC1-11179
3.11.5.7	Federated Farmers of New Zealand	V1PC1-705
3.11.5.7	Fertiliser Association of New Zealand	PC1 – 10632
3.11.5.7	Ata Rangi 2015 Limited Partnership	PC1-6201
Schedule A Registration with Waikato Regional Council	Matamata-Piako District Council	PC1-3670
Schedule A Registration with Waikato Regional Council	South Waikato District Council	PC1-4115
Schedule A Registration with Waikato Regional Council	Federated Farmers of New Zealand	V1PC1-710
Schedule A Registration with Waikato Regional Council	Waipa District Council	PC1-3225
Schedule A Registration with Waikato Regional Council	Waitomo District Council	PC1-10337
Schedule B Nitrogen Reference Point	Federated Farmers of New Zealand	V1PC1-717
Schedule B Nitrogen Reference Point	Oji Fibre Solutions (NZ) Limited	PC1 – 8743
Schedule C Stock exclusion	Federated Farmers of New Zealand	V1PC1-758
Schedule C Stock exclusion	Fertiliser Association of New Zealand	PC1 – 10649
Schedule C Stock exclusion	Oji Fibre Solutions (NZ) Limited	PC1 – 8803
Schedule 1 Requirements for Farm Environment Plans	Federated Farmers of New Zealand	V1PC1-766
Schedule 1 Requirements for Farm Environment Plans	Waipa District Council	PC1-3243
Schedule 1 Requirements for Farm Environment Plans	Oji Fibre Solutions (NZ) Limited	PC1 – 8806
Schedule 2 Certification of Industry Schemes	Waikato and Waipā River Iwi	PC1-3668
Schedule 2 Certification of Industry Schemes	Federated Farmers of New Zealand	PC1-10857
Table 3.11-1	Beef + Lamb NZ	V1PC1-675
Table 3.11-1	Hamilton City Council	PC1-11044

Plan provision	Submitter	Submission Point ID
Table 3.11-1	Waipa District Council	PC1-3238
Table 3.11-1	Waitomo District Council	PC1-10848
Table 3.11-1	Waikato and Waipā River Iwi	PC1-3250
Table 3.11-1	Watercare Services Ltd	PC1-8435
Table 3.11-1	Federated Farmers of New Zealand	V1PC1-783
Table 3.11-1	Oji Fibre Solutions (NZ) Limited	PC1 - 8828
Additions to Glossary of Terms	Hamilton City Council	PC1-10208
Additions to Glossary of Terms	Federated Farmers of New Zealand	PC1-10858
Additions to Glossary of Terms	Federated Farmers of New Zealand	V1PC1-811
Additions to Glossary of Terms	Watercare Services Ltd	V1PC1-830
Additions to Glossary of Terms	Oji Fibre Solutions (NZ) Limited	PC1 - 12311
Definition - Certified Farm Nutrient Advisor	Waipa District Council	PC1-3239
Definition - Certified Farm Nutrient Advisor	Waitomo District Council	PC1-10851
Definition - Farming Activities	Waipa District Council	PC1-3241
Definition - Farming Activities	Waitomo District Council	PC1-10853
Definition - Offset	Federated Farmers of New Zealand	V1PC1-806
Definition - Offset	Oji Fibre Solutions (NZ) Limited	PC1 - 8946
Definition - Point source discharge/s	Hamilton City Council	PC1-11049
Definition – Stock Unit	Oji Fibre Solutions (NZ) Limited	PC1 - 8948