



Recommendation and decision on notification of resource consent application(s) under sections 95-95G of the Resource Management Act 1991 (RMA)

Summary

I recommend the application is publicly notified. This is because:

- I consider that adverse effects from this activity will be more than minor.
- The proposal is inconsistent with Policy 5.1.1, Policy 9.2.1 and Rule 9.2.1 of the Operative Regional Coastal Plan which seek to preserve the natural character of the coastal marine area, and to discourage the anchoring or mooring of ships for use as a base or accommodation facility.
- I consider that the applicant has not at this stage demonstrated a functional need for the use of vessels as base/accommodation facilities in the coastal marine area.
- I consider that effects on potentially affected parties may be more than minor. Also, it is difficult for Environment Southland to clearly identify all parties who may be potentially adversely affected.

The application

Particulars

Applicant:	Real Journeys Limited
Application reference:	APP-20202513
Site address or location:	Goose Cove, Paterson Inlet, Stewart Island
New consent(s) for new activity(ies) (s88)	<input checked="" type="checkbox"/>
New consent(s) for existing activity(ies) (s88)	<input type="checkbox"/>
Change to conditions of existing consent(s) (s127)	<input type="checkbox"/>

The proposal

Real Journeys Limited (the applicant) has applied for a coastal permit to undertake the following activities within the Coastal Marine Area in Goose Cove, Paterson Inlet, Stewart Island/Rakiura:

- To install, maintain and exclusively occupy part of the coastal marine area with a swing mooring in Goose Cove, Paterson Inlet, Stewart Island / Rakiura.
- To use and moor a vessel of up to 40 metres overall length, capable of sleeping up to 74 passengers plus crew, as a base/accommodation facility.

The effects of COVID-19 on the international visitor's market resulted in the applicant having surplus vessels and are seeking authorisation to periodically relocate either their "Milford Mariner" or "Fiordland Navigator" vessels (both vessels are approximately 40 metres in length) from Fiordland to Stewart Island to act mostly as accommodation bases for backcountry trips (mainly five day – four night excursion or a three day – two night excursion).

Passengers will be transferred with the currently operating Stewart Island Ferries from Bluff to either the "Milford Mariner" or the "Fiordland Navigator" which will mainly serve as accommodation bases. Both of the vessels also carry two 6.3 metre aluminium pontoon style tender crafts which will be used to transfer

passengers to and from various water and land-based activities such as guided kayaking excursions, birding, hiking and cruising close inshore to show passengers various points of interest in the vicinity.

For safe mooring during the said backcountry trips the applicant also proposes to install, maintain and exclusively occupy part of the coastal marine area with a swing mooring at approximately NZTM2000 1231773N 4786580E in depth of water of approximately 7 metres (at low tide) in Goose Cove, with a swing radius of approximately 60 metres. The applicant is seeking to occupy the proposed mooring on a preferential basis as it was indicated that the mooring will be available for use by other parties when not in use.

The mooring structure will consist of a new single anchor leg mooring (SALM) (a swing mooring). The SALM system, also referred to as a tension leg mooring system, consists of an anchor point, which in this case is a screw anchor or pile, shackles, two mooring lines (a hawser and a tether) and a submerged buoy (submerged when in use) and floats. The proposed mooring was specifically designed to accommodate the applicant’s coastal vessels up to the size of the “Fiordland Navigator” or the “Milford Mariner” (length 40 metres, beam 10 metres, draft 1.8 metres and max displacement 690 gross tonnes). The “Milford Wanderer” (approximately 30 metres in length) will also utilise the mooring during its current multiday Stewart Island Discovery Expeditions tours.

The applicant is seeking a consent term of 10 years.

Coastal permit	
Relevant rule(s)	Rule 9.2.19 (RCP) – Anchored or moored ships used as a base/accommodation facility – Discretionary Rule 11.7.7.8 (RCP) – Moorings in other areas – Discretionary Rule 11.7.7.9 – Moorings for which preferential or exclusive use is required - Discretionary
Occupation status applied for	Exclusive occupation
Mooring location (NZTM2000)	1231773N 4786580E
Mooring type	Single Anchor Leg Mooring (SALM)
Names and size of vessels	Milford Mariner - 693 Gross tonnage Fiordland Navigator - 693 Gross tonnage Milford Wanderer - 258 Gross tonnage
Passenger Capacity	74 passengers plus crew

Overall, the application is a **discretionary** activity.

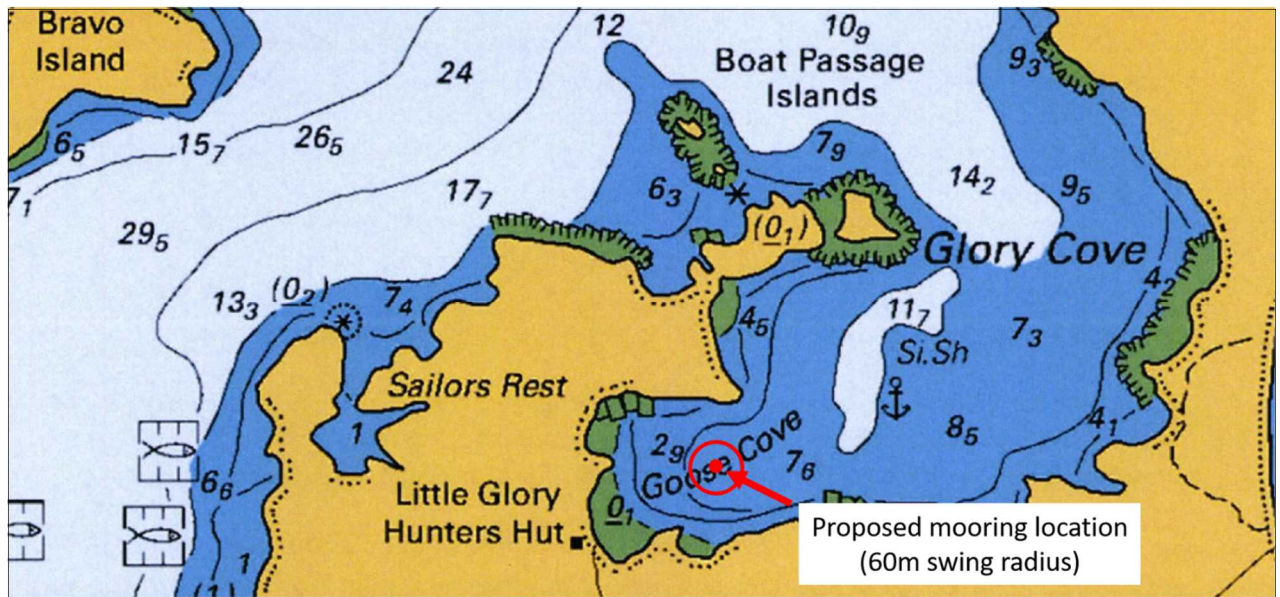


Figure 1: Locality Map



Figure 2: Aerial View

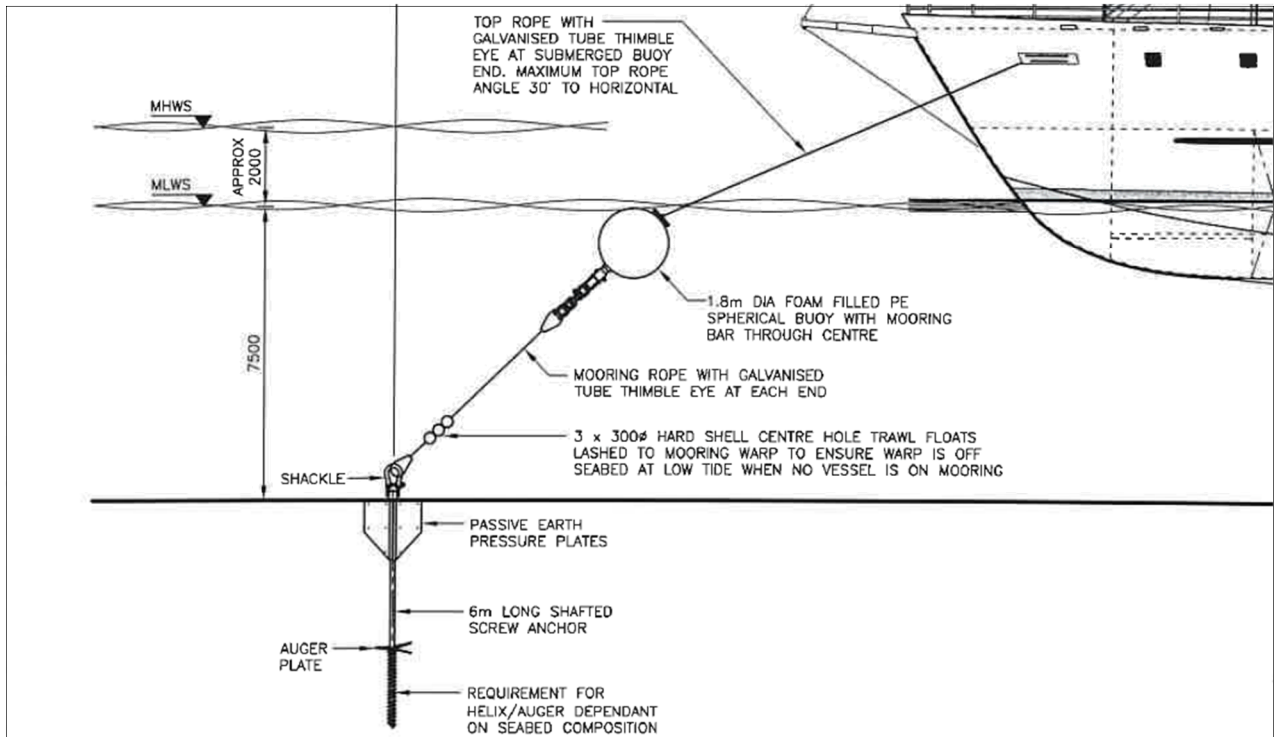


Figure 3: Mooring design





Figure 4: 'Milford Mariner' and 'Fiordland Navigator' vessels

Public notification consideration

1. Is notification mandatory?

1.1	Has the applicant requested that the application be publicly notified? (s95(3)(a))	<input type="checkbox"/> Yes	Application must be publicly notified. Go to 10.2
		<input checked="" type="checkbox"/> No	Go to 1.2
1.2	Was further information, or commissioning of a report, requested under s92?	<input checked="" type="checkbox"/> Yes	Go to 1.3
		<input type="checkbox"/> No	Go to step 2.1
1.3	If yes, was the request refused, or did the applicant fail to respond or fail to provide the information by the deadline?	<input type="checkbox"/> Yes	Public notification is required by s95C. Go to 10.2
		<input checked="" type="checkbox"/> No	Go to step 2.1

2. Is notification precluded?

2.1	Is each activity subject to a rule or NES that precludes public notification?	<input type="checkbox"/> Yes	Rule(s): enter rule Go to 4.1
		<input checked="" type="checkbox"/> No	Go to step 2.2
2.2	Is each activity a controlled activity?	<input type="checkbox"/> Yes	Application must not be publically notified unless there are special circumstances. Go to 4.1
		<input checked="" type="checkbox"/> No	Go to 2.3
2.3	Is each activity a residential activity <u>and</u> a discretionary activity or a restricted discretionary activity?	<input type="checkbox"/> Yes	Application must not be publically notified unless there are special circumstances. Go to 4.1

No Got to 3.1

3. Is notification required?

3.1 Are any of the activities subject to a rule or NES that requires notification?	<input type="checkbox"/> Yes	Application must be publicly notified. Go to 10.2
	<input checked="" type="checkbox"/> No	Go to 3.2
3.2 Will the activity have, or is it likely to have, adverse effects on the environment that are more than minor? (see Note)	<input checked="" type="checkbox"/> Yes	Application must be publicly notified. Complete 3.3 and go to 10.2
	<input type="checkbox"/> No	Complete 3.3 and go to 4.1.

Note: In forming this opinion (a) to (e) apply:

- (a) we must disregard any effects on persons who own or occupy the land on which the activity will occur or any land adjacent to that land (section 95D(a));
- (b) we may disregard an adverse effect of the activity if a rule or NES permits an activity with that effect (subject to Policy 36 of the pSWLP) (95D(b));
- (c) in the case of a restricted discretionary activity, we must disregard any adverse effects that do not relate to the matters over which the rule or NES restricts discretion (95D(c));
- (d) we must disregard trade competition and the effects of trade competition - 95D(d); and
- (e) we must disregard any effect on a person who has given written approval - 95D(e)

3.3 Reasons adverse effects on the environment are more than minor

The existing environment

The proposed mooring structure and accommodation bases will be situated within Goose Cove which is a small bay within Glory Cove in Paterson Inlet/Whaka a Te Wera, Stewart Island/Rakiura. The application describes Glory Gove as follows:

Glory Cove is a small, fairly sheltered, deeply indented bay which runs off the south-east of Paterson Inlet. Its depth is mostly between 6 and 15 metres. Its opening is 3.5 nautical miles from the entrance of Paterson Inlet to the open sea of Foveaux Strait. It is not exposed to open ocean wave action. Glory Cove is surrounded by slightly hilly land, forest-clad to the water's edge around its western half, and by coastal scrub along its southeast margin. Its shores have no infrastructure, except a small jetty which provides access to the Glory Cove Scenic Reserve. The cove shore consists of rocky outcrops, stones and small beaches.

Glory Cove adjoins the Glory Cove Scenic Reserve with its jetty and walking track to Ocean Beach where Kiwi viewing is a significant tourist attraction. Hunting, tramping, and recreational boating are the other predominate recreational opportunities adjacent the site of this application, with Glory Cove being a safe anchorage.

Glory Cove is situated within Regional Coastal Plan for Southland (RCP) Appendix 4 Landscape Unit 29: Eastern Bays with a Naturalness Rating of 3+ on a scale where 3 is characterised as a modified environment where a reasonable balance has been struck between the retention of the original vegetation and production. It should be noted that Landscape Unit 29 comprises the whole of Paterson Inlet (including Oban and Big Glory Bay).

In making my recommendation, I undertook a site visit on 14 January 2021 to inform my recommendation. My observation was that the original characteristics of the landscape in Goose Cove is still completely intact, and offers very high natural character, landscape and amenity values due to its sheltered location and unmodified nature.

The land adjacent to Paterson Inlet includes public conservation land, Rakiura Maori Land Trust Land and other private land and users of the land that include residents, holiday makers, hunters, and trampers. There are also Department of Conservation Huts and Rakiura Hunter Camps Charitable Trust Huts adjacent the Paterson Inlet. Paterson Inlet also includes existing consented marine farm activities and other man made structures, but that these are not visible from Goose Cove.



Figure 5: View into Goose Cove

Adverse effects of the proposed activities on the environment

Section 9.2 of the RCP states that where ships are anchored or moored in one place for a continual period of time and are used as base/accommodation facilities, the extent of associated adverse effects can increase to unacceptable levels. These effects may relate to exclusion of other vessels from anchorages and mooring areas, and adverse effects on visual amenity, natural character, discharges, public access or navigational safety. Such ships may also have an element of use for which there is no functional need within the coastal marine area.

Policy 9.2.1 of the RCP seeks to discourage the anchoring or mooring of ships for use as a base or accommodation facility. The explanation to the policy also states that adverse effects on visual amenity, natural character, discharges, public access or navigational safety are particularly obvious in remote parts

of the coastal marine area, and become more persistent and less acceptable the longer that ship remains in one place.

The explanation for Rule 9.2.1, which seeks to implement Policy 9.2.1 states that in most cases, the use of the coastal marine area by ships as base/accommodation facilities is not acceptable unless there is a particular need to do so.

Based on the direction provided in Section 9.2 of the RCP I have considered the following main aspects and potential adverse effects on the environment associated with the proposal:

Demonstrated functional need for the activity

Section 9.2 acknowledge that the anchoring and mooring of ships actively involved in fishing, tourism or recreational activities is a legitimate activity for coastal users, but considers that any accommodation part of the activity is incidental to the activity itself.

When considering a functional need for the use of ships as base/accommodation facilities in the context of Section 9.2 it is my interpretation that a functional need refers to circumstances where there is no practical alternative to using the ship as base/accommodation facilities, and there is a particular need to do so.

While I consider that the applicant has demonstrated a commercial need for the use of the vessels as base/accommodation facilities, I do not consider that a commercial need demonstrates a practical or functional need for the activity in the context of Section 9.2.

Landscape, natural character and amenity values

Objective 5.1.1 of the RCP seeks to *preserve the natural character of the coastal marine area*, and explains that much of the coastal waters of Stewart Island/Rakiura represent one of the largest areas of unmodified marine habitats in New Zealand. The explanation to the objective further states that the natural character of Stewart Island/Rakiura is valued very highly when measured by any parameter given the natural state of the majority of the adjoining land, and that it is therefore very worthy of preservation.

Policy 5.1.1 of the RCP seeks to adopt the policies of the Policies of the New Zealand Coastal Policy Statement (NZCPS) relating to natural character. Although the NZCPS also makes provision for the maintenance and enhancement of the public open space qualities and recreation opportunities within the coastal environment, one of the key issues identified in promoting sustainable management is the loss of natural character, landscape and amenity values and wild or scenic areas along the coast. Clear direction is provided in Policies 13 and 15 to “avoid” effects on natural character within landscapes of outstanding natural character, to “preserve” the natural character of the coastal environment and to “protect” it from inappropriate subdivision, use, and development.

As referred to above, Glory Cove is situated within RCP Appendix 4 Landscape Unit 29: Eastern Bays with a Naturalness Rating of 3+ on a scale where 3 is characterised as a *modified environment where a reasonable balance has been struck between the retention of the original vegetation and production*. During a site visit my observation was that the original characteristics of the landscape in Goose Cove are still completely intact, and offers very high natural character, landscape and amenity values due to its sheltered location and unmodified nature. Paterson Inlet west of a line from Bullers Point to Ackers Point (excluding Big Glory Bay) was also identified as an Area Containing Significant Values (ACSV) under Appendix 5 of the Coastal Plan.

It is the applicant’s assessment that the vessel will be small in the context of the landscape, and that the vessel will be tucked away out of site and not readily visible from most of Paterson Inlet.

I am of the view that the proposed mooring structure with the semi-permanent mooring of a 40 metre vessel as a base/accommodation facility and the associated activities would constitute a high impact water-based facility that will be visually prominent in the context of the immediate, relatively small and unmodified landscape setting of Goose Cove.

When considering the proposal against the policy direction and the natural character and amenity values of the landscape and setting in which the activities are proposed, I am of the view that the 'naturalness' of Goose Cove will be adversely affected to an extent that will be more than minor.

Public access, availability of space & navigational safety

The proposal to use and moor a vessel of up to 40 metres overall length as a base/accommodation facility will occupy the CMA and exclude access to an area of approximately 400m² occupied by the vessel, and the area immediately adjacent to the vessel with the mooring having a swing radius of 60m.

I consider that the applicant has sufficiently illustrated that this occupation of CMA by a vessel is relatively small compared to the total 8,900-hectare area of Paterson Inlet, and that there is sufficient area in Glory Cove for other vessels to anchor without inhibiting access to others users of the area.

It was also illustrated in the application that Real Journeys Limited meet Maritime New Zealand's requirements to operate in accordance with navigational safety regulations. Council's Maritime Officer also did not have any concerns with regard to navigation safety.

For the above reasons I consider that potential effects of the proposal on public access, availability of space & navigational safety will be no more than minor.

Wildlife, ecosystems & habitats

The applicant has provided an assessment of the potential effects of the proposal on wildlife, ecosystems and habitats. This assessment is not in dispute and is adopted.

During the proposed installation of the mooring structure a small area of the seabed will be disturbed by divers' movements and drilling to secure the screw / pile anchors. However, I expect that the silt from these activities will quickly settle after installation and that effects on wildlife, ecosystems and habitats will be less than minor.

The applicant has proposed that vessels will approach the mooring at no-wake speed, and that it is unlikely to stir up the bottom silts which may affect seabed ecosystems. The applicant has also indicated that they will adhere to the Department of Conservation's Marine Mammal Code of Practice to avoid disruption to marine mammals.

Overall, it is my opinion that the proposed use and mooring of the vessel as a base/accommodation facility are unlikely to have more than minor adverse effect on wildlife and their habitats.

Biosecurity

The applicant has indicated that marine pests such as *Undaria pinnatifida* are present in Paterson Inlet. Consequently, before returning to the internal waters of Fiordland the vessel hulls, kayaks, tender crafts, and lines that have been exposed to the waters of Paterson Inlet will be checked, cleaned, and dried as per Biosecurity New Zealand and MPI instructions and the requirements of the Fiordland Marine Regional

Pathway Management Plan. Therefore, I consider that the potential for the operation to give rise to a biosecurity risk is no more than minor.

Wake effects

The applicant has stated all vessels associated with the proposal will be approaching the proposed mooring site at no-wake speed, and that vessels will be operating at 5 knots within 50 metres of any other vessel, raft, or person in the water or within 200 metres of the shore or of any structure. Therefore, the effects of wake on the surrounding landforms, flora, fauna, structures or vessels is expected to be no more than minor.

Historical, spiritual & cultural values

The proposed activities are to be undertaken within the Rakiura/Te Ara a Kiwa (Rakiura/Foveaux Strait Coastal Marine Area), which is a statutory acknowledgement area under Schedule 104 of the Ngāi Tahu Claims Settlement Act 1998, and local rūnanga may therefore be affected by the proposed activities. Te Rūnanga o Ngāi Tahu and Te Ao Marama Inc were identified as affected parties for the purposes of notification.

Wastewater & rubbish disposal

The vessels have on board effluent holding tanks that currently pump effluent ashore for treatment. However, the applicant has stated that they are considering installing an OMNIPURE™ on board wastewater treatment plant (initially on the “Milford Mariner” as this is the vessel most likely to be used for this proposal). The application describes that the system has the ability to treat sewage effluent to within a ‘Grade A’ discharge as detailed in Resource Management Marine Pollution Regulations 1998 (RMMPR) which according to Section 12 of the regulations may be discharged into the CMA.

The application further states that If the plant is not installed or is out of service for repair, wastewater would be held in the on board effluent holding tanks until discharged outside Paterson Inlet, more than 200 metres (0.108 nautical miles) from a marine reserve, more than 500 metres (0.27 nautical miles) seaward from mean high water springs or from a marine farm in accordance with the RMMPR. Such discharges will occur en route to and from Bluff Harbour when the vessels are travelling to Bluff for bunkering every 5 days.

Waste products generated on board will be removed from the main vessels via the Stewart Island Ferries and disposed of ashore in land-based recycling facilities and in landfill.

Noise & lighting effects

Acoustic Engineering Services Limited undertook noise level tests on both the *Fiordland Navigator*, the *Milford Mariner* and a representative tender craft. The results have shown that all the noise levels for all the vessels comply with the Regional Coastal Plan for Southland’s Rule 5.3.4 - General noise limits and Rule 5.3.6 – Noise limits for ships in motion.

However, I am of the view that effects from noise emanating from activities on the vessels when moored will contribute to adverse effects on the natural character and amenity values, and on other users of the adjacent land areas of the relatively small area within Goose Cove.

I also note the applicant’s assessment of potential lighting effects where light spill created by vessels using the proposed mooring were considered to be minimal and small in scale, and that no detectible ‘skyglow’ will be created by the vessels. However, similar to noise effects from the vessels when moored I also

consider that light from the vessels during night time will contribute to the adverse effects on the natural character and amenity values of Goose Cove, and on other users of the adjacent land areas.

Planning provisions (policies and objectives) relevant to adverse effects

Regional Coastal Plan:

The most relevant policies from the Regional Coastal Plan are below:

- Objective 5.1.1 Preserve the natural character of the coastal marine area.

- Policy 5.1.1 Adopt the policies contained in Chapter 1 of the New Zealand Coastal Policy Statement in so far as they apply to the coastal marine area.

- Policy 9.2.1 Discourage the anchoring or mooring of ships for use as a base or accommodation facility.

- Objective 11.7.7.1 Seeks to avoid, wherever practicable, remedy or mitigate the adverse effects of moorings.

Conclusion: significance of adverse effects on the environment

I am satisfied that the physical effects of the applicant’s proposal, and potential effects on public access, availability of space & navigational safety will be no more than minor. However, when considering the proposal against the policy direction and the natural character landscape and amenity values of the landscape and setting in which the activities are proposed, I am of the view that the adverse effects on these values of the receiving environment will be more than minor.

I also consider that a functional need for the activity could not be demonstrated by the applicant, and that the proposal is inconsistent with the most relevant policies of the Coastal Plan which seeks to preserve the natural character of the coastal marine area, and to discourage the anchoring or mooring of ships for use as a base or accommodation facility.

4. Special circumstances and public notification

4.1 Do special circumstances exist in relation to the application that warrant the application being publicly notified?	<input type="checkbox"/> Yes	Application must be publicly notified. Explain reasons in 4.2 and go to 10.2
	<input checked="" type="checkbox"/> No	Explain reasons in 4.2. If each activity is a controlled activity go to 10.1. Otherwise go to 5.1

4.2 Reasons why special circumstances do or do not exist

While the proposed activity is not currently occurring in this locality, I consider it does not meet the legal and caselaw parameters for being unusual or exceptional, noting the activity status is discretionary

Affected Parties and Limited Notification

5. Protected Customary Rights Group or Customary Marine Title group

5.1	Is the activity in the coastal environment, within an area where it may adversely affect a protected customary rights group(s) or a customary marine title group(s) (see s95G)?	<input checked="" type="checkbox"/> Yes	Go to 5.2
		<input type="checkbox"/> No	Go to 6.1
5.2	May the activity have adverse effects on a protected customary right carried out in accordance with the requirements of Part 3 of the Marine and Coastal Area (Takutai Moana) Act 2011?	<input checked="" type="checkbox"/> Yes	The customary rights group(s) is an affected customary rights group(s). Application must be limited notified on them. Record in 5.3 and go to 6.1
		<input type="checkbox"/> No	Go to 6.1

5.3 Adversely affect a protected customary rights group(s) or a customary marine title group(s):

There are no protected customary right or customary marine title groups at present, although Te Rūnanga o Ngāi Tahu is a customary marine title applicant group for which a decision is yet to be made. The applicant has not received a response to its correspondence with Te Rūnanga o Ngāi Tahu.

6. Statutory Acknowledgement Areas

6.1	Is the activity on or adjacent to, or may it affect, a statutory acknowledgement area?	<input checked="" type="checkbox"/> Yes	Go to 6.2
		<input type="checkbox"/> No	Go to 7.1
6.2	Are the adverse effects on Te Rūnanga o Ngāi Tahu minor or more than minor?	<input checked="" type="checkbox"/> Yes	Include TRONT in 8.2 and go to 6.3
		<input type="checkbox"/> No	Go to 6.3

6.3 Reasons why adverse effects on Te Rūnanga o Ngāi Tahu are less than minor, minor or more than minor:

I consider that effects on Te Rūnanga o Ngāi Tahu will be at least minor. The proposal occurs in an area that the Crown has acknowledged Ngāi Tahu has a cultural, spiritual, historic and traditional association with.

7. Is limited notification precluded?

7.1	Is each activity subject to a rule, NES or regulation that precludes limited notification?	<input type="checkbox"/> Yes	Go to 9.1
		<input checked="" type="checkbox"/> No	Go to 8.1

8. Are any people adversely affected?

8.1	Are the adverse effects on a person minor or more than minor (but not less than minor)?	<input checked="" type="checkbox"/> Yes	Go to 8.2
		<input type="checkbox"/> No	Go to 8.3

8.2 Person(s) considered to be adversely affected (complete and go to 8.3)

Person	Effect on person (see Note)	Reasons why effect is minor or more than minor	Has written approval been provided?
Te Ao Marama Inc	Activity may have cultural & spiritual effects	Proposed activities may affect historical, spiritual & cultural values.	No
Te Rūnanga o Ngāi Tahu	Activity may have cultural & spiritual effects	Proposed activities may affect historical, spiritual & cultural values.	No
Rakiura Maori Land Trust	Activities may affect surrounding/adjacent land-uses	The semi-permanent presence of the vessel may generate effects on this party.	No
Department of Conservation	Activity may affect native species.	The proposal may affect wildlife, ecosystems and habitat.	No
Rakiura Marine Guardians	Activities may affect the marine environment	The proposal may affect the marine environment at the proposed mooring site and surrounds.	No
Other users of the CMA and adjacent/surrounding land areas	Activities may affect other users of the CMA and adjacent/surrounding land areas.	The proposal may affect or alter the natural character and amenity values of Glory Cove and Goose Cove	N/A - There are other users of this area, some of whom already have awareness of this proposal and have contacted ES. ES does not have a complete inventory or understanding of such users

8.3 Reasons why no other person is considered to be adversely affected

I consider that the proposed activities will adversely affect the natural character and amenity values of Glory Cove and Goose Cove to an extent that will be more than minor. This will affect other users of the CMA and adjacent/surrounding land areas. On that basis public notification of the application is recommended.

9. Special Circumstances – Limited Notification

9.1 Are there special circumstances that warrant limited notification of any other persons?	<input type="checkbox"/> Yes	Application must be limited notified to those persons and any other affected persons. Go to 9.2
	<input checked="" type="checkbox"/> No	Go to 10

Recommendation and decision

10. Officer's recommendation

10.1 The application be processed non-notified	<input type="checkbox"/>
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10.2	Public notification is recommended	<input checked="" type="checkbox"/>
10.3	The application be placed on hold while the applicant tries to obtain written approvals from the affected persons	<input type="checkbox"/>
10.4	Limited notification is required. Persons to be served notice are those listed in 8.2	<input type="checkbox"/>



George Gericke
Consents Officer

Date: 1 April 2021

Decision under Delegated Authority

11.1	I agree with the recommendation	<input checked="" type="checkbox"/>
11.2	The application will be processed non-notified	<input type="checkbox"/>
11.3	The application will be publicly notified	<input checked="" type="checkbox"/>
11.4	The application shall be placed on hold while the applicant tries to obtain written approvals from the affected persons	<input type="checkbox"/>
11.5	The application will be limited notified. The parties to be served notice are those listed in section 8.2	<input type="checkbox"/>

This decision is made under delegated authority by:



Bruce Halligan
Acting Consents Manager

Date: 1 April 2021