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LGOIMA

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Information requested by the media, lobby groups, public sector organisations and MPs will always be published, while information specific to an individual or their property will not generally be published.

Request from:	Max Salmon, New Zealand Taxpayers' Union
Information requested:	Climate Change Submission
Response from:	Simon Bastion, Chief Executive

31 March 2021

Max Salmon
New Zealand Taxpayers' Union

Via Email:

Dear Max

Official information request for Climate Change Submission details

I refer to your official information request dated 30 March 2021 for Climate Change Submission details.

You have asked for the following information:

- 1) The submission you made to Climate Change Commission
The information you have requested is enclosed.
- 2) Which advisors or consultants, if any did you use in relation to your submission?
Paul Pretorius (ex Chief Executive of the Grey District Council)
- 3) If you did use advisors or consultants, how much did you pay for their services?
The final price is yet to be advised, however the expected cost is approximately \$1,500.00

There is no charge in supplying this information to you.

Council has adopted a Proactive Release Policy and accordingly may publish LGOIMA responses on the Council Website at <https://www.westlanddc.govt.nz/lgoima-responses>. The collection and use of personal information by the Westland District Council is regulated by the Privacy Act 2020. Westland District Council's Privacy Statement is available on our website [here](#)

If you wish to discuss this decision with us, please feel free to contact Mary-anne Bell, Senior Administration Assistant at LGOIMA@westlanddc.govt.nz, 03 756 9091.

Sincerely,



Simon Bastion | Chief Executive

SB/MB

Enclosed: 20.21.65 Westland District Council - Climate Change Submission 25.03.21



OFFICE OF THE MAYOR

**His Worship the Mayor
Bruce Smith**

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FILE REF: CCL 7

25 March 2021

SUBMISSION

COMMENTS ON THE CLIMATE CHANGE COMMISSION'S 2021 DRAFT STRATEGY TO ACHIEVE THE CLIMATE MANAGEMENT COMMITMENTS AGREED TO BY THE GOVERNMENT UNDER THE PARIS ACCORD

Thank you for the opportunity to comment on the Climate Change Commission's First Draft advice on the strategy to achieve the Crown's commitment to the Paris Accord. Our submission must be read in conjunction with the submissions of Grey District Council, Buller District Council, West Coast Regional Council and Development West Coast as well as the submissions made on behalf of other industry groups on the Coast i.e. Agriculture, Mining, Forestry and Fishery.

We offer this submission in two parts, being

- A synopsis of our comments
- Our responses to the specific consultation questions including more detailed comments on each.

A. SYNOPSIS:

The salient aspects of our comments on the Strategy are as follows:

We:

- Acknowledge Climate Change as a reality and serious threat to the future of the Planet.
- Acknowledge the science that identifies emissions as a contributing factor to Climate Change.
- Acknowledge the need for urgent and decisive action to arrest the impacts of Climate Change on the Planet in order to ensure a sustainable future.
- Readily accept the stated levels of emission reductions outlined in the report as being necessary to achieve the Crown's commitments as outlined.
- Readily accept the advice that planting trees will not provide the answer and that other, action is needed to achieve the required emission reductions.
- Note and appreciate the clear and deliberate efforts in the report to be balanced.

However, we:

- Ask that the Strategy includes a clear caution to the Crown that any New Zealand Climate Change action/response should be subject to the following as a package:
 - All countries in the world committing to a workable action plan aimed at net zero emissions of long-lived gases by 2050 and reducing biogenic methane emissions to internationally agreed levels.

- A credible and accountable monitoring regime be imposed on each country to ensure ongoing compliance with the targets and that an associated enforcement system be put in place (i.e. by the United Nations).
- The World Bank commits to assisting those countries especially in the Third World to achieve the targets agreed to in good faith under the Paris Accord.

Currently, seven Middle Eastern Bloc countries appear not to have committed to a dedicated emissions reduction programme. This detracts from the global success in reducing emissions/arresting global warming as required under the Paris Accord and will require other countries to make even greater reductions to make up for the non-involvement of these countries. However, the current right of countries to simply opt out of the Accord and its targets, is of even greater concern. We have seen the United States of America as a significant contributor to the problem simply walk away from it for a period of time. This should not be an option.

As the Strategy rightly states, compliance with the Paris Accord emission targets will require a dedicated global response. Our input as outlined in the Strategy will come at a significant, if not devastating cost to the New Zealand economy and society and yet, will make a near negligible contribution to global emission reduction (- our contribution is a mere 0.3% of the global contribution). New Zealand cannot do it alone or in conjunction with only some countries. Therefore, going alone will be mere tokenism and will not positively impact Climate Change.

- Ask that the equitability principle as advocated in the Strategy be further expanded by making the point that some Regions in New Zealand already make a greater contribution to carbon reduction than others. The West Coast as a Region is already making a significant contribution to New Zealand's carbon reduction response. Apart from being a relatively small generator of carbon (compared to most other Regions), the fact that in excess of 87% of the Coast is under natural forests with another 3% under other forms of forestry and vegetation, makes us a significant carbon sink. This has, over many decades served as a significant economic growth inhibitor for the Coast (access to only 10% of our land for development) and the Strategy should provide for recognition of such higher inputs and that certain compliance exceptions necessary for our sustainability must be granted.
- Do not agree with your suggestion that the compliance programme be made inter-generational. Why must the current generation foot the bill for "the wrongs of the past" and securing a sustainable world for tomorrow. We respectfully suggest that many actions taken in compliance with a strategy over the next 30 years to 2050 will be loan funded with the loan terms making it effectively inter-generational.
- Have serious concerns that compliance with the Strategy as outlined will be devastating to the West Coast as a Region. We note your recommendation to the Crown that certain Regions i.e. the West Coast will require Government support, but do not believe that it will be sufficient to secure sustainability for the Region.

On the one hand, we have concerns with the practical viability of some of your recommendations and, on the other, we are concerned about achievability. A particular concern with the Strategy is that it focuses overly much on limiting carbon emissions at source and expanding the existing carbon sink through the planting of trees but that it does not give sufficient recognition to the benefits that emerging carbon trapping technology, i.e. magnesite or "fizzy water" can offer. It appears as if this holds a lot of promise internationally and, whilst the Commission may argue that it is as yet unproven, we respectfully point out that many aspects of the Commission's proposed Strategy are aspirational.

- Believe that the Commission's focus on coal and the burning of coal is possibly emotive. We understand that only 7% of New Zealand's emissions come from coal and coal burning yet coal provides heat/energy to a significant part of our country's economy.

Find some statements in the report of the Commission to be unconvincing. One example is the conclusion that the cost of full implementation of the action plan as proposed by the Commission for New Zealand will not be more than 1% of projected GDP. No evidence to support this is offered and for us as community leaders on the Coast, it appears grossly optimistic. There are various other such examples in the Strategy.

- Find some comments made in the report to be inconsistent. One example is the suggestion to reduce stock numbers whilst, at the same time suggesting that production can be maintained and even be increased. We suggest that the New Zealand Agricultural sector is hugely capable and that production outputs are already very close to optimum.

B. OUR COMMENT ON SPECIFIC QUESTIONS ASKED IN THE REPORT:

1. Do you support the principles we have used to guide our analysis? Is there anything we should change and why?

We generally support the 7 principles detailed in the report (pages 29 and 30) but submit that all the principles should be read acknowledging the following:

This to be a global issue requiring a global response.

As acknowledged in the Strategy, the impact of Climate Change for New Zealand will be determined by the measure of success in reducing global emissions. We contribute a mere 0.3% of emissions and, even if we could reduce this to zero, the impact on global warming would be negligible. For New Zealand to reduce its emissions, significant technological and attitude changes will be required which will impose huge costs on the economy and society. New Zealand should not embark on any such programme until such time that all world nations commit to the Paris Accord targets, performance monitoring and compliance through the UN is in place and those countries requiring assistance be assisted through the World Bank.

In addition to this we submit an amendment to principle 5:

Principle 5: Transition to an equitable and inclusive way.

Add the following:

"Where Regions within New Zealand already make an inequitable contribution to the management of Climate Change, i.e. the West Coast of the South Island through its vast natural forests, such contributions should be acknowledged either monetarily or by means of compliance exemptions to bring their contribution in line with that of other regions".

2. Do you support budget recommendation 1? Is there anything we should change and why?

We note the three budgets recommendations and, apart from the comments herein, have no comment.

3. Do you support our proposed break down of emissions budgets between gross long-lived gases, biogenic methane and carbon removals from forestry? Is there anything we should change and why?

We accept the break-down as provided as bona fide, but ask that the Commission considers available Crown evidence in order to ensure that its response is appropriate.

4. Do you support budget recommendation 4? Limit on offshore mitigation for emissions budgets and circumstances justifying its use. Is there anything we should change and why?

We note the focus on domestic mitigation and the associated adversity to offshore mitigation.

5. Do you support enabling recommendation 1? Cross-party support for emissions budget. Is there anything we should change and why?

Yes. The budgets must enjoy national support in order to increase achievability. This consultation by the Commission should not replace the need for multi-sector (commercial, industrial etc) inputs in the run-up.

6. Do you support enabling recommendation 2 Coordinate efforts to address climate change across Government? Is there anything we should change and why?

Yes, noting our comments herein.

7. Do you support enabling recommendation 3 Genuine, active and enduring partnership with iwi/Maori. Is there anything we should change and why?

Yes.

8. Do you support enabling recommendation 4, Central and local government working together in partnership? Is there anything we should change and why?

In general terms yes. It needs to be noted that will come at a cost to local government and the recommendation regards funding mechanisms is supported.

9. Do you support enabling recommendation 5, establish processes for incorporating the views of all New Zealanders? Is there anything we should change and why?

In principle yes. It has to be pointed out that this is a national programme and that the initiative should predominantly lie with Central Government.

10. Do you support our approach to focus on decarbonating sources of long-lived gas emissions where possible? Is there anything we should change?

Whilst we understand and accept the need to de-carbonate sources of long-lived gases, we believe this should be done in parallel with the deployment of carbon trapping technology. The Commission's Strategy shows a strong, unwarranted focus on coal as opposed to other, much more relevant sources of emissions.

11. Do you support our approach to focus on growing new native forests to create long-lived source of carbon removals? Is there anything we should change and why?

We support planting native trees on marginal conservation land on the basis that it will be recognised under ETS.

We do raise strong concerns about the availability of land for such available plantings.

12. Do you support the overall path that we have proposed to meet the first three budgets? Is there anything we should change and why?

Whilst we generally understand the path as outlined in the first three budgets, our comments as outlined herein need to be carefully considered. We have no illusions about the severity of its impacts on our District and wider Region, if not the Country as a whole.

13. Do you support the package of recommendations and actions we have proposed to increase the likelihood of an equitable, inclusive and well-planned climate transition? Is there anything we should change and why?

We support the development of an Equitable Transitions Strategy subject thereto:

- That it be developed in consultation with all sectors
- That it recognises that some Regions, i.e. the West Coast of the South Island makes a larger contribution to the reduction of greenhouse gases than other regions and that this larger contribution should be acknowledged monetarily or through compliance exemptions.
- The unwarranted if not emotive preponderance on coal should be reconsidered.

We support the rest of the package of recommendations noting our comments elsewhere herein.

14. Do you support the package of recommendations and actions for the transport sector? Is there anything we should change and why?

We offer the following comments:

14.1. Enhance national transport network integration to increase walking, cycling, low emission public and shared transport and encourage less travel by private car.

We, in general terms generally support the intent, but do not believe that the proposed methodology will be successful, at least not in our Region. We point out the following:

- The larger commercial/cultural centre being Christchurch (where important health and other services are located) is three hours away from Hokitika with public transport, where available both inappropriate and unaffordable especially to the traveller that is subject to time and productivity constraints.
- The West Coast as a Region stretches from Karamea in the north to Haast in the south, with Greymouth acting as Regional commercial, health and supporting service hub. Public transport is available for only parts of the way and will, even if full coverage can be achieved, present a viable option to very few users only.
- Public transport is not available in the Westland district and will be costly if not impractical to achieve.
- Many of the large employers within our District i.e., Milk Products work shifts which makes shared travelling difficult.

Having said this, we believe that there is room for improvement in current practises but we insist that this must be practical and logical and must not put our economy and society unduly at risk. One such initiative would be to make the Coast part of the Hiringa Energy (Taranaki) Hydrogen supply.

14.2. Accelerate the uptake of electric vehicles.

Whilst we understand the motivation for this, we question the practicality for our Region, for the following reasons:

- The cost of an EV is generally two thirds higher than that of an ICE vehicle, which has affordability implications for a Region where the average cost of the household car is under \$10,000. We could find no evidence to support the premise that it will become affordable into the future.
- The average EV has a reach capability on a single charge of around 200km. The mountainous topography on the Coast reduces this significantly and people travelling from Greymouth to Christchurch find it difficult to reach Arthurs Pass where charging facilities are available.

If they do reach Arthurs Pass, the time necessary to recharge is prohibitive to the traveller subject to a timeline.

- The Coast with its high rainfall and often severe weather conditions also requires at times four-wheel-drive vehicles to be used. We remain unconvinced about the merits of four-wheel-drive EVs.
- The average Coaster is a doer and reliant on a trailer to cart stuff around. As we know, an EV has a towing capacity of approx. 20% of that of an ICE vehicle. We believe it will prove unattainable.
- EV's have a shorter life expectancy than an ICE vehicle and the assurances in the report that it will be cheaper to maintain than an ICE vehicle are duly questioned by the fact that a replacement battery pack for a Mitsubishi EV currently costs \$31,000.
- We understand that New Zealand does not have the facilities to dispose of expired EV battery packs and that it has to be exported. The Chinese Sword experience in relation to Waste Recycling, for one has confirmed the need to consider impacts of initiatives through all of its stages and this certainly is no exception.

Once again, we believe that improvements can be achieved on current vehicle use and deployment and that the focus on the development of other, low carbon fuel, should continue as a priority alongside making EVs affordable.

14.3. Increase the use of low carbon fuels for trains, ships, heavy trucks and planes

We in principle accept the merits of this, but point out that:

A. Heavy Road Transport:

- A very well-managed and highly productive heavy road transport industry has developed on the Coast in response to the reality that rail, sea and air do not provide practical alternatives. Of the other modes of transport, rail has the most potential for growth but cannot replace road transport given limitations of the Midland Line.
- Transitioning to different fuel types for such transport is likely to cost a lot more, which is likely to make road transport much dearer. Currently, fuel on the Coast costs 12% more than in Christchurch and any further cost impositions will be unhelpful to our economy.
- Despite the existing fuel cost premium, the cost of road transport is reasonably comparable to that of rail.

B. Ships

- Our shipping fleet is limited to fishing vessels. Whilst the size of vessels has in recent years increased, it is fair to say that the nucleus of the industry is made up of a group of smaller vessels operating at marginally above break-even. Any changes to the industry will come at a cost which may very well be too high for many of the smaller vessels to afford and may impact on an industry that is highly productive.
- The cost reality of current fuel premiums already apply to shipping and further cost increases will impact the industry.

C. Trains

- Rail is important for the Coast especially in relation to the Tranz Alpine, the transport of milk from Westland Dairy, the transport of coal (Buller and Grey), and the transport of export and imports of other smaller producers. It is important for the local economy to maintain this mode of transport as a productive and affordable service. It is being run on diesel as a result of severe gradients along the route and the fact that no electrification of the rail line is available.

- The cost of transforming to other fuels will come at a cost which may well impact on the economics of the service. The harsh reality is that rail is not cheaper than road transport and that road transport will increase if rail should become unviable. Of greater importance is the reality that cost increases can impact on the viability of key industries like Westland Dairy Co.

D. Air Transport

- Air transport on the Coast is generally limited to the Air New Zealand passenger services into Hokitika and Sounds Air into Westport, both services which at times in the past have struggled to be economically sustainable, and helicopters used in industry and tourism. As an industry, it is small compared to most other Regions.
- The cost of transforming to other fuel types together with the cost premiums already in place, may well make these services economically unviable.

It is suggested that some improvements can be made on current practices but with the current focus on optimization already making the services very productive, it is suggested that it may be negligible.

Whilst we understand the reason for the recommendations, we have severe reservations about its practicality, especially for our Region. We draw attention to our comments made in the previous section of this submission.

15. Do you support the package of recommendations and actions for the heat, industry and power sectors? Is there anything we should change and why?

15.1. Decarbonise energy.

We, in general terms support this intention and, in particular the development of a National Energy Strategy. In relation to the greater use of renewable energy: it must involve a greater focus on reality on the part of the Crown who has, for the sake of a small group of kayakers, refused approval for the Waitaha Hydro scheme. This scheme would have minimal environmental impact, and was supported by local iwi, but which will assist in making the Coast self-sufficient.

15.2. Maximise the use of electricity as low emissions fuel.

We accept the merits of this in general terms, but point out that:

- Heat and energy on the Coast, historically was created through the burning of coal and wood, both commodities which have been in over-supply and at low cost. To transition to electricity will in itself be costly. Our main concern is that the cost of electricity is prohibitive for households etc. This reality was confirmed, as recently as last year when the Crown, in building the new Te Nikau Hospital in Greymouth, insisted on coal heating as a cost cutting measure.
- The Coast is fed with electricity via a historic single line through the Alps and a second, more recent line via Kikawa, which we had to build ourselves as a means of securing greater security of supply. This is supplemented by a number of private generation facilities across the Region. With one leg of our ring-feed supply aged, our concerns about security of supply will increase if our reliance on electricity is to increase.
- Our coal is environmentally cleaner than most coals used across the world and, as the Strategy acknowledges, is ideal for steel production. To stop local coal use will likely bring an end to the industry which may put New Zealand in a position of importing coal while it is

transitioning to electricity etc. It does not make sense to stop NZ coal production while there is still a demand for it.

- The cost of electricity on the Coast is 26-49% dearer (depending on location) than Christchurch. Thank you for acknowledging this in the Strategy. This already represents a significant cost imposition on us. If we are to be more reliant on electricity, the cost per user will be further increased.
- Whilst we readily accept the assurances in the report that factors like the closure of the aluminium smelter at Tiwai Point will provide sufficient electricity for the greater electrification as provided for in the report, we are under the impression that this will require the national grid to be reconfigured as a means to providing a more even distribution across the country. This will come at a cost and the impact on the current cost premium on the Coast will add to our cost woes.
- The cost of transitioning internal processes together with the higher cost (than current sources) is likely to impact on the viability of larger industries, i.e. Westland Dairy Processing. The loss of this industry on the coast would be devastating to the West Coast economy.

15.3. Scale up provision of low emissions energy sources.

We support this in principle on the basis that the cost and practicality concerns for the Coast associated with a transitioning to such fuels be understood and appreciated. In 2018, the government supported work (lead by GNS) to highlight the potential of geothermal power on the West Coast. That study concluded in theory that Geothermal potential did in fact exist and that a second stage exploration (test drilling) was required to substantiate the findings. A second IGF application was declined. We request that this project be re-energised as an alternative source of energy for the West Coast.

15.4. Reduce emissions from process heat

We support this in principle, noting that coal and timber, for the reasons as outlined above have been the sources of cheap heat and energy for many years and that the costs associated with making the transition to other fuels i.e. electricity and the cost thereof will be significant if not prohibitive.

15.5. Support innovation to eliminate emissions from industrial processes.

We support the development of a long-term strategy for the abatement of emissions from hard-to-abate industries on the basis that we will have input into it as a means of managing impacts for our Region. This Strategy must be developed in consultation with the relevant sectors.

15.6. Efficiently use energy in buildings.

In principle, we support this and suggest that the Building Act may be an effective vehicle to achieve it. However, we offer the following comment:

- As earlier stated, coal, wood and, to a lesser extent gas provided affordable energy in buildings alongside electricity which mostly provided lighting. The cost of replacing existing energy technology with electricity or other low-carbon emissions fuels will be substantial. We note your recommendation for the Crown to provide funding.
- As earlier stated, the cost of electricity on the Coast is high and further increases in consumption will be financially unaffordable for many.

We do suggest that further energy efficiency is possible under current heating/energy arrangements but reiterate that electricity/other fuels will find it very difficult to compete.

15.7. Transport, buildings and urban form

We in principle agree that the above, applied judiciously, can contribute to lower emissions over time.

Whilst we understand the reason for the recommendations, we have reservations about its practicality especially for our Region. We draw attention to our comments made in the previous section of this submission.

16. Do you support the package of recommendations and actions for the agriculture sector? Is there anything we should change and why?

16.1. Reduce biogenic agricultural emissions through on-farm efficiency and technology.

Whilst we, in principle agree with the intent, we offer the following comments:

- We note your assurances that the Biological Emissions Reference Group is satisfied that reducing emissions through stock reduction, the use of low nitrogen stock feed supplement and breeding low emission sheep for the farms will be achieved without any reduction in profitability. However, your report offers no supporting evidence and it leaves us unconvinced. We believe that natural challenges associated with farming on the Coast (very high rainfall, soil types, diseases etc) has developed a high degree of competence in the farming sector and that especially stock numbers are already at an optimum and that any reduction in numbers will impact on financial viability.
- We note your advice in regards to the development of new technologies i.e. methane inhibitors and an associated vaccine and confirm our support subject that it be done in consultation with the farming sector. Your advice on p.180 that it will help reduce methane emissions by 50% is most promising. The introduction of emerging asparagopsis feedstock technology may really address the negative perceptions that Agriculture has to contend with.
- We note the ICCC pricing regime on biological emissions as an incentive to lower emissions and the Crown's He Waka Eke Noa Partnership as something that the Agricultural sector is best suited to comment on and ask that the Agricultural sector be made part of any associated decision-making and policy development. Our only request is that the importance of the Agricultural sector to the New Zealand economy be recognised. It is the sector that is keeping New Zealand going through COVID.

16.2. Create options for alternative farming systems and practices

We generally support this but offer the following comments:

- The high rainfall on the Coast and other related factors make large areas of the Coast unsuitable or less suitable for horticulture, arable cropping and, to some extent, sheep farming. This means that beef and dairy is the main type of farming and that the arable cropping is often winter feed for such cattle.
- The Agricultural industry is more capable to add value to this and we ask that they be made part of any decision-making or policy development.

Whilst we understand the reason for the recommendations, we have reservations about its practicality especially for our Region. We also remain unconvinced that a reduction in stock numbers will not impact on production.

17. Do you support the package of recommendations and actions for the forestry sector? Is there anything we should change and why?

17.1. Manage forests to provide a long term carbon sink.

We understand the preference expressed in the report for native forests on the basis that it, unlike exotics, will not be subject to harvesting every 30 years and therefore is a more permanent sink. We also understand the suggestion that owners of land convert parts of their farms to forests. We however deem it unfair to ask the Coast landowner to make any bigger contribution in this regard than it is already making and offer the following comment:

- 87% (plus SNAs) of the Coast is already under some form of conservation management whilst various land owners are managing their land with a strong environmental focus. This means only 10-13% of our entire Region is available for production.
- Our farmers are subject to significant operational challenges on the land that can be farmed with undulating topography, very high rainfall etc all contributing to the challenge. Add to this natural disasters such as cyclones and earthquakes, and it is a real issue. Yet, they have largely perfected their trade and the per capita output of West Coast farms is generally very high.
- Because of the scarcity of farmland the cost is high and it needs to be optimally used in order to give the farmer a sustainable return. Any expectation on them to grow trees on it is, in our view most unfair.

18. Do you support the package of recommendations and actions for the waste sector? Is there anything we should change and why?

18.1. Reduce emissions from waste.

We generally agree with the intents of the report and strongly suggest that the Waste Minimization Fund be available for it.

18.2. Manage the transition from Hydrofluorocarbons.

We generally agree with the intents of the report.

19. Do you support the package of recommendations and actions to create a multisector strategy? Is there anything we should change and why?

Yes.

20. Do you agree with budget recommendation 5? Is there anything we should change and why?

We do not deem ourselves as being competent to comment on this very technical recommendation and will leave it to the consultation process to come up with an appropriate response.

21. Do you support our assessment of the country's NDC? Do you support our NDC Recommendation?

We accept the Commission's advice on face value and leave it to the general consultation process to come up with an appropriate response.

22. Do you support our recommendations on the form of the NDC?

We do not deem ourselves as being competent to comment on a. as a technical recommendation and will leave it to the consultation process to come up with an appropriate response. In relation to b, we believe that it should not be a formal recommendation and that it should rather be left to the World Bank or similar development aid agency to seek international contributions.

23. Do you support our recommendations on reporting on and meeting the ND? Is there anything we should change and why?

Generally, in support.

24. Do you support our assessment of the possible required reductions in biogenic methane emissions?

We accept the Commission's advice on face value

Thank you for the opportunity.



Bruce Smith
MAYOR



Simon Bastion
CHIEF EXECUTIVE

WDC 20.21.65 Released under LGOIMA