

19 June 2026

Environmental Protection Agency
Attention: Fast-track team

Private Bag 63002
Wellington 6140
New Zealand

By Email: substantive@fasttrack.govt.nz

Floor 2
The Regent Building
33 Cathedral Square
Christchurch 8011

PO Box 13831
Christchurch 8140
New Zealand

al.nz

Dear Fast-track team

ŌHOKA RESIDENTIAL SUBDIVISION - SUBSTANTIVE APPLICATION UNDER THE FAST-TRACK APPROVALS ACT 2024

- 1 We act for Carter Group Limited (**Carter Group**).
- 2 This letter accompanies and submits the substantive application under the Fast-track Approvals Act 2024 (**Application**) for the Ōhoka Residential Subdivision (**Project**) approvals under:
 - (i) Section 42(4)(a) for subdivision and land use resource consents that would have otherwise been applied for under the Resource Management Act 1991 (**RMA**);
 - (ii) Section 42(4)(h) for a wildlife approval lawful authority for an act or omission that would otherwise be an offence under the Wildlife Act 1953 (**Wildlife Act**); and
 - (iii) Section 42(4)(i) for an archaeological authority that would otherwise be required under the Heritage New Zealand Pouhere Taonga Act 2014 (**HNZPT Act**), including any application for approval of a person to carry out the activity pursuant to section 42(9)(b).
- 3 The approvals sought will enable the comprehensive subdivision and development of approximately 154 hectares of rural-zoned land at 531 & 535 Mill Road, 325 & 347 Whites Road, and 236 Bradleys Road, Ōhoka (**Site**),¹ adjoining the Ōhoka settlement in the Waimakariri District. The Project is a listed project in Schedule 2 of the FTAA and will deliver significant regional benefits, providing for:
 - (a) the creation of approximately 879 residential allotments;
 - (b) a large allotment to accommodate a retirement village;
 - (c) two super lots to enable a small local centre over an area of approximately 1.5 hectares;
 - (d) a 7.5-hectare allotment to accommodate a polo ground;
 - (e) supporting access lots; and
 - (f) land to vest for roading, reserves, and utility purposes.

¹ Being Lot 1, 2 & 3 Deposited Plan 318615, Lot 2 and Part Lot 1 Deposited Plan 8301, and Lot 2 Deposited Plan 61732.

- 4 In support of the Application, please find **enclosed**:
- (a) Substantive Application Form for the Project, including:
 - (i) Checklist A (Resource consent, change to or cancellation of a resource consent);
 - (ii) Checklist A1 (Subdivision or reclamation resource consent);
 - (iii) Checklist A2 (Application including standard freshwater fisheries activity checklist);
 - (iv) Checklist E (Wildlife Approval);
 - (v) Checklist F (Archaeological Approval); and
 - (vi) Checklist J (Listed Project Information Requirements);
 - (b) An Assessment of Environmental Effects (**AEE**); and
 - (c) Appendices containing reports and information referred to in the AEE.

APPLICATION REQUIREMENTS

- 5 The Application:
- (a) complies with:
 - (i) section 42;² and
 - (ii) sections 43 and 44;³
 - (b) relates solely to a listed project;
 - (c) does not involve an "ineligible activity"; and
 - (d) the relevant fees and levy in respect of the Application will be paid once an invoice is received.
- 6 Accordingly, the Application is complete and falls within scope for the purposes of section 46(2) of the FTAA.
- 7 Further context is provided below in relation to:
- (a) section 43(2)(c) which requires an explanation of how the Application is complete and within scope of the listed project;
 - (b) the advice received from Environment Canterbury (**ECan**) in relation to its notice under section 30(3)(b); and

² As the "authorised person" for the Project, which is listed in Schedule 2 of the FTAA, Carter Group is entitled to lodge the Application under section 42 of the FTAA.

³ For completeness, an assessment of the Application against the requirements of sections 43 and 44 is set out in **Attachment A** to this letter.

(c) the consultation / notification requirements for the Project.

- 8 The information described in paragraph (b) is provided to assist the Environmental Protection Authority (EPA) in making its recommendation under section 47 as to whether there are any competing applications or existing resource consents for the same activity.

Explanation of how the Application is complete and within scope of the listed project

- 9 Section 43(2)(c) of the FTAA requires the Applicant to provide:

the information that the applicant provided to the Minister when applying to have the project listed as a listed project and an explanation of how the substantive application is within the scope of the listed project.

- 10 The information provided to the Minister when applying to have the project listed is available on the Ministry for Environment website.⁴
- 11 The Project the subject of this Application is within the scope of the listed project. In particular the location of the Project remains consistent with that described in the listing application, being land at "511, 531, 535 and 547 Mill Road, and 290 and 344 Bradleys Road, Ōhoka, Canterbury".⁵
- 12 For the avoidance of doubt, it is acknowledged that the listing application refers to "approximately 152 hectares" of rural land, whereas this Application relates to approximately 154 hectares. This difference arises because the 2-hectare property at 531 Mill Road, although expressly identified in the description of the site in the listing application, was not included within the indicative master plan at that time. The indicative master plan provided with the listing application was preliminary in nature. As is typical for projects of this scale, the layout and design have evolved as investigations have progressed, including the incorporation of land that was expressly identified as forming part of the listed project.
- 13 While the potential inclusion of that property was signalled at the time the listing application was made, its acquisition had not then been confirmed. That position has since changed, and the site has now been secured, as outlined in the Authorised Person's statement. The updated master plan provided with the Application accordingly incorporates that land.
- 14 The Application therefore remains consistent in substance with the Project as described for the purposes of assessing its suitability for listing and the inclusion of 531 Mill Road does not take the Project outside the scope of the listed project. Rather:
- (a) it expressly formed part of the "site address or location" described in the listing application;
 - (b) the listing application itself made clear that descriptions of the project were indicative, including references to "approximately" 152 hectares and the provision of "at least" 850 dwellings; and
 - (c) the refinement of the Project footprint and layout through to lodgement is consistent with the level of design development anticipated for listed projects progressing to substantive application.

⁴ Available here: <https://environment.govt.nz/acts-and-regulations/acts/fast-track-approvals/fast-track-projects/ohoka-residential-subdivision/>

⁵ See section 1 of the listing application: https://environment.govt.nz/assets/what-government-is-doing/Fast-track-approved/Ohoka-Residential-Subdivision/231.01-response-ANON-URZ4-5FQR-K_Redacted.pdf

- 15 For those reasons, the Application properly falls within the scope of the listed project for the purposes of section 43(2)(c) of the FTAA.

Competing Applications or Existing Resource Consents for the same activity

- 16 We understand that pursuant to section 47 of the FTAA, the EPA, in consultation with relevant administering agencies and consent authorities, is required to make a recommendation to the Minister for Infrastructure (**Minister**) on:
- (a) whether a substantive application has any competing applications; and
 - (b) if a substantive application seeks an approval described in section 42(4)(a) (resource consent), whether there are any existing resource consents of the kind referred to in section 30(3)(a) that are not identified in the substantive application.
- 17 As set out in the record of consultation (**Appendix 3** to the AEE):
- (a) On 30 March 2026, Carter Group, via counsel, formally notified ECan as relevant regional consent authority, of the Ōhoka Project in accordance with section 30(2) of the FTAA.⁶
 - (b) On 13 April 2026 (as corrected on 14 April 2026 to address a minor error), ECan advised that, for the purposes of section 30(3)(b), it had not identified any existing resource consents or competing applications relevant to the approvals sought.⁷
 - (c) On 1 May 2026, ECan provided further correspondence following its review of additional draft technical material provided to it by the Applicant. That correspondence raised questions in relation to the proposed take of water for dust suppression, including whether the activity would comply with Rule 8.5.12 of the Canterbury Land and Water Regional Plan (**LWRP**), and indicated ECan's preliminary view at that time that condition (1) of Rule 8.5.12 is not satisfied, as the proposed take is considered to have stream depletion effects.⁸
 - (d) On 8 May 2026, ECan clarified by email that its correspondence dated 1 May 2026 (and any subsequent correspondence of that nature) constituted additional feedback provided on the basis of further information, and was not a response for the purposes of section 30(3) of the FTAA. ECan confirmed that it did not consider there to be any need or mechanism to amend or reissue its section 30(3) advice, and noted that it will have a further opportunity to review the substantive application under section 47(1)(b) of the FTAA.⁹
- 18 For the avoidance of doubt, the paragraphs that follow set out the Applicant's position in relation to Rule 8.5.12 of the LWRP, and address the additional correspondence received from ECan on that matter, as well as the consequent refinements made to the Applicant's technical material in response. For ease of reference, Rule 8.5.12 is set out below:

⁶ Appendix 9, Tab 2.

⁷ Appendix 9, Tab 3.

⁸ Appendix 3, Tab 3.

⁹ Appendix 4, Tab 4.

8.5.12 The taking and use of groundwater is a restricted discretionary activity, provided the following conditions are met:

1. For stream depleting groundwater takes, the take, in addition to all existing consented surface water takes, does not result in an exceedance of any minimum flow in Table 8c and 8d; and
2. The take:
 - (a) will replace a lawfully established take affected by the provisions of Section 124-124C of the RMA, and the rate, seasonal or annual volume of the take, in addition to all existing consented takes, does not exceed the relevant allocation limits in Tables 8c, 8d, and 8e; or
 - (b) will not replace a lawfully established take affected by the provisions of Section 124-124C of the RMA, and the rate, seasonal or annual volume of the take, in addition to all existing consented takes, does not exceed the allocation limits in Tables 8c, 8d, and 8e; and
3. The take and use of groundwater does not have a direct, high or moderate stream depletion effect on any surface water body within the Kairaki / McIntosh Surface Water Allocation Zone; and
4. Unless the proposed take is the replacement of a lawfully established take affected by the provisions of sections 124-124C of the RMA, the bore interference effects on any groundwater abstraction other than an abstraction by or on behalf of the applicant are acceptable, as determined in accordance with Schedule 12.

Rule 8.5.12 of the Canterbury Land and Water Regional Plan

- 19 The information reviewed by ECan as background to its correspondence refers to the draft Dewatering and Dust Suppression Report (**Draft Report**) prepared by **Mr Carl Steffens** of Pattle Delamore Partners Limited for the Applicant. The Draft Report, sets out that the proposed take and use of groundwater for dust suppression would comply with Condition 1 of Rule 8.5.12, including on the basis that the activity would not result in stream depletion effects of a nature that would trigger non-compliance. That remains the Applicant's position.
- 20 Notwithstanding this, Mr Steffens subsequently updated his report to respond to the matters raised by ECan and to further explain and support the Applicant's position in relation to Rule 8.5.12 (**Updated Dewatering and Dust Suppression Report**).¹⁰
- 21 In the Updated Dewatering and Dust Suppression Report, Mr Steffens explains that:
 - (a) in relation to Condition 1, and in light of ECan's correspondence dated 1 May 2026, PDP undertook a specific assessment of the take of water for dust suppression from bore M35/0367 (pages 29–30). That assessment concludes that Condition 1 is met because:
 - (i) the appropriate classification of the hydraulic connection under Schedule 9 of the LWRP is "low", and is therefore not considered stream depleting for the purpose of Rule 8.5.12; and
 - (ii) the existing irrigation consents (which relate to the Land) will not be exercised concurrently with the proposed activities (and that is proposed as a condition of consent), such that the proposal will result in a significant net reduction in groundwater abstraction and associated stream depletion effects relative to the existing consented baseline;

¹⁰ Appendix 2 to the AEE.

- (b) there is sufficient allocation available within the zone to accommodate the proposed take, and the remaining conditions of Rule 8.5.12 are met.
- 22 On that basis, Mr Steffens also provides an assessment of the matters of discretion under Rule 8.5.12. While that assessment is not repeated in detail here, the overall conclusion is that the proposed take and use of groundwater for dust suppression is consistent with the rule and will result in no more than minor adverse effects, and in practice will represent a reduction in effects compared to the existing environment.
- 23 The Updated Dewatering and Dust Suppression Report was not provided to ECan prior to lodgement of this Application, but will be provided promptly following lodgement so ECan can comment promptly on it under section 53. Carter Group intends to continue engaging constructively with ECan on the Application, with a view to narrowing or resolving any outstanding issues.
- 24 If, however, ECan were to maintain a different view as to the application of Rule 8.5.12, the Applicant considers that this does not affect the assessment of whether there are any existing resource consents or competing applications for the same activity for the purposes of section 47 of the FTAA because:
 - (a) the question of whether the proposed activity will result in stream depletion effects in terms of Condition 1 of Rule 8.5.12 is not met is a technical and evidential question that is properly determined by an expert consenting panel based on the evidence before it; and
 - (b) Rule 8.5.14 of the LWRP provides that the taking and use of groundwater that does not meet Condition 1 of Rule 8.5.12 is a prohibited activity. Mr Steffens concludes that:
 - (i) the proposed activity does not fall within that category; and
 - (ii) there is sufficient allocation available within the zone to accommodate the proposed take;
 - (c) accordingly, no application has been made for a prohibited activity under Rule 8.5.14 of the LWRP (on the basis that the Project complies with Rule 8.5.12); and
 - (d) in those circumstances, there can be no competing application or existing resource consent for that prohibited activity, as it does not form part of the Application.
- 25 In any event, we understand that, if it were ultimately determined through the FTAA process that the proposed approach does not comply with Rule 8.5.12, alternative dust suppression methods are available that would avoid any such non-compliance with the rule.
- 26 The Applicant respectfully requests that the EPA have regard to the matters set out above, together with the Updated Dewatering and Dust Suppression Report, in making its recommendations under section 47 of the FTAA.
- 27 For the avoidance of doubt, the additional correspondence provided by ECan does not affect the completeness of the Application for the purposes of section 46 of the FTAA, as ECan confirmed that its letter dated 13 April constitutes its response for the purposes of section 30(3). The above explanation is included for context only, and to assist the EPA in making its recommendation under section 47.

Consultation / Notification Requirements

- 28 The following paragraphs provide a summary of the consultation undertaken by the Applicant.
- 29 The Applicant began preparing the application with a view to lodgement and, in doing so, commenced consultation with the person or groups required under sections 11 and 29 in 2025.¹¹
- 30 Subsequently, the Fast-track Approvals Amendment Act 2024 (**Amendment Act**) introduced changes to section 11. However, because consultation had already commenced prior to 31 March 2026 (being the second commencement date of the Amendment Act), clause 11 of Schedule 1 of the FTAA applies. Clause 11 of Schedule 1 provides that:

11 Notification under section 29 if consultation undertaken before second commencement date

- (1) This clause applies if an authorised person has, as at the second commencement date, consulted or started consulting under old section 29.
- (2) The authorised person is not required to notify any person or group referred to in section 29(1)(aa) that the authorised person consulted or started consulting before the second commencement date.
- (3) The authorised person must notify any person or group referred to in section 29(1)(aa) that the authorised person has not consulted or started consulting before the second commencement date.
- (4) The authorised person must finish their pre-commencement consultation.
- (5) Section 43(2)(a)(i) applies, in respect of pre-commencement consultation, as if the reference to section 29 were a reference to old section 29.
- (6) In this clause, pre-commencement consultation means consultation that was completed or started under old section 29 before the second commencement date.

- 31 On that basis, for each of the persons or groups with whom the Applicant had commenced consultation prior to 31 March 2026,¹² the Applicant has completed that pre-commencement consultation for the purposes of clause 11(4). This includes completion of consultation with:
- (a) the relevant local authorities, being Waimakariri District Council and ECan;
 - (b) the relevant iwi authorities, hapū, and Treaty settlement entities, being Te Rūnanga o Ngāi Tahu (**TRoNT**) and Te Ngāi Tūāhuriri Rūnanga via Whitiara Centre Limited (**Whitiara**) (as discussed further at paragraphs 33 to 35 below); and
 - (c) the relevant administering agencies, being the Department of Conservation (in relation to Wildlife Act approvals) and Heritage New Zealand Pouhere Taonga (in relation to archaeological authorities).¹³

¹¹ While this marked the commencement of consultation for the purposes of the Application, the history of engagement with many of these parties is significantly longer, given the history of the of the Project through earlier private plan change and plan review processes.

¹² Being the "second commencement date" as defined by clause 5 of Schedule 1 of the FTAA.

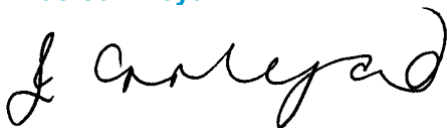
¹³ The Applicant also "notified" the Ministry for the Environment (**MfE**), as the administering agency of the Resource Management Act 1991, on the basis that consultation with MfE had not commenced prior to 31 March 2026. MfE subsequently confirmed by email that the Amendment Act removed that consultation requirement (**Appendix 8, Tab 2**).

- 32 Records of consultation with each of the above entities are included in the appendices to the AEE.
- 33 For completeness, **Appendix 6** includes records of consultation with TRoNT and Ngāi Tūāhuriri, including engagement initially undertaken via Mahaanui Kurataiao Limited (**MKT**) with respect to Ngāi Tūāhuriri but subsequently with Whitiara with respect to Ngāi Tūāhuriri.
- 34 To explain, while consultation was initially undertaken with MKT, subsequent correspondence from Ngāi Tūāhuriri confirmed engagement with mana whenua is to be solely with Whitiara as the representative of Te Ngāi Tūāhuriri Rūnanga.¹⁴ TRoNT confirmed its support for that position to counsel for the Applicant.¹⁵
- 35 Accordingly, consultation has since been directed through Whitiara. For the purposes of clause 11 of Schedule 1, consultation was considered complete when Whitiara advised (by email) that its preference was to provide assessments and comments post-lodgement due to capacity constraints and process considerations.

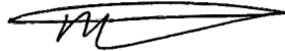
Summary

- 36 In summary, it is the Applicant's position that the Application is complete and within scope for the purposes of section 46 of the FTAA.
- 37 The Applicant has also set out its position in relation to ECan's advice under section 30(3), and the subsequent correspondence received. That material is provided for context only and to assist the EPA in making its recommendation under section 47 and does not affect the completeness of the Application.
- 38 The Applicant and its technical experts remain available to assist the EPA in relation to any aspect of the Application.

Yours faithfully
Anderson Lloyd



Jo Appleyard
Partner
d +64 3 335 1252
m +64 27 444 7641
e jo.appleyard@al.nz



Meg Davidson
Solicitor
d +64 3 335 1254
m +64 27 845 1121
e meg.davidson@al.nz

¹⁴ **Appendix 6, Tab 5 and Tab 7.**

¹⁵ **Appendix 6, Tab 2.**

ATTACHMENT 1: ASSESSMENT OF THE APPLICATION AGAINST SECTIONS 43 & 44 OF THE FAST-TRACK APPROVALS ACT 2024

- 1 The Substantive Application (**Application**) for the Ōhoka Residential Subdivision (**Project**) complies with the requirements of ss 43 and s 44 of the Fast-track Approvals Act 2024 (**FTAA**). Specifically, the Application complies with 43(1) because it:
 - (a) is lodged in the form and manner approved by the Environmental Protection Authority (s 43(1)(a));
 - (b) explains why the Project is consistent with the purpose of the FTAA to “facilitate the delivery of infrastructure and development projects with significant regional or national benefits”. The significant regional and national benefits of the Project are detailed in **Appendix 2** (Economics Report) to the AEE (s 43(1)(b)(i));
 - (c) does not involve any ineligible activities as defined in s 5 of the Act (s 43(1)(c));
 - (d) is not lodged by more than 1 authorised person (s 43(1)(d));
 - (e) is not subject to any information requirements specified by the Minister under s 27(3)(b)(ii) (s 43(1)(e));
 - (f) has not been subject to an application for determination under ss 23 or 24 (s 43(1)(f));
 - (g) does not seek an approval for an activity that is the subject of a determination under s 33 (s 43(1)(g));
 - (h) does not relate to a priority project (s 43(1)(h));
 - (i) as a listed project, is not subject to a deadline specified in a notice under s 38(3)(d) (s 43(1)(i));
 - (j) all fees, charges, or levies payable under regulations in respect of the application will be paid by the applicant (s 43(1)(j))
- 2 If the application is a listed project, it must also contain the information set out in s 43(2) which provides that it must also contain the information required by section 13(4) (other than section 13(4)(b), (f)(ii) and (iii), and (g)), which applies—
 - (a) as if the reference in section 13(4)(k) to section 11(a) were a reference to section 29;
 - (b) as if the reference in section 13(4)(ka) to section 11(1)(b) were a reference to section 29; and
 - (c) as if the reference in clause 2 of Schedule 11 to section 12(2) were a reference to section 29; and
 - (d) with any other necessary modifications.
- 3 The Application complies with section 43(2)(a) because:
 - (a) it contains a description of the Project and the activities it involves (s 13(4)(a));
 - (b) it does not involve any ineligible activities as defined by s 5 (s 13(4)(c));

- (c) it contains a description and maps of the whole project area that identifies the boundaries in sufficient detail to enable consideration of the Application (s 13(4)(d));
- (d) it describes the anticipated commencement and completion dates for construction activities (s 13(4)(e));
- (e) it outlines the nature and timing of proposed stages for development (s 13(4)(f)(i));
- (f) it describes the anticipated and known adverse effects of the project on the environment (s 13(4)(h));
- (g) it describes the activities involved in the project that are prohibited under the Resource Management Act 1991 (in this case under the National Environmental Standards for Freshwater) (s 13(4)(i));
- (h) it includes a list of the persons and groups the applicant likely considers affected by the project (s 13(4)(j)), including:
 - (A) the relevant local authorities, being Waimakariri District Council and Canterbury Regional Council (s 13(4)(j)(i)); and
 - (B) the relevant iwi authorities, hapū, and Treaty settlement entities (discussed at paragraph 28-35 of the body this letter) (s 13(4)(j)(ii)-(iv));
 - (C) there are no protected customary rights groups and customary marine title groups (s 13(4)(j)(v));
 - (D) the project area is not within or adjacent to, or would not directly affect, ngā rohe moana o ngā hapū o Ngāti Porou (s 13(4)(j)(vi));
 - (E) the Marine and Coastal Area (Takutai Moana) Act 2011 is not relevant (s 13(4)(j)(vii)); and
 - (F) the Application does not involve persons with a registered interest in land that may need to be acquired under the Public Works Act 1981 (s 13(4)(j)(viii));
- (i) it includes a summary of the consultation undertaken for the purposes of s 29 and how the consultation has informed the Project (s 13(4)(k));
- (j) there are no Treaty settlements that apply to the Project area (s 13(4)(l));
- (k) no processes have been undertaken under the Public Works Act 1981 in relation to the Project (s 13(4)(m));
- (l) the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 is not relevant to the Application (s 13(4)(n));
- (m) it does not include parcels of Māori land, marae, and identified wāhi tapu within the project area (s 13(4)(o));
- (n) the applicant is not seeking a determination under s 23 of the FTAA (s 13(4)(p));
- (o) the applicant is not seeking a determination under s 24(2) of the FTAA (s 13(4)(q));

- (p) the applicant is not seeking a determination under s 24(4) of the FTAA (s 13(4)(r));
- (q) it contains a description of the applicant's legal interest in the land and contains a statement of how that affects the applicant's ability to undertake the work (s 13(4)(s));
- (r) no other consents, certificates, designations, and other legal authorisations (other than contractual authorisations or the proposed approvals) are needed to authorise the Project (including any that may be needed by someone other than the applicant) (s 13(4)(t));
- (s) no activities involved in the Project, or are substantially the same as those in the Project, have been the subject of an application or a decision under a specified Act (s 13(4)(u));
- (t) it contains a description of whether and how the projects will be affected by climate change and natural hazards (s 13(4)(v));
- (u) is not lodged by more than one authorised person (s 13(4)(w));
- (v) no compliance or enforcement actions have been taken against the Applicant under a specified Act (s 13(4)(x));
- (w) it includes the information specified in (s 13(4)(y)) including in:
 - (i) Clause 2 of Schedule 5 (resource consent information requirements) (s 13(4)(y)(i)), including:
 - (A) An assessment against:
 - (1) any relevant national policy statements;
 - (2) any relevant national environmental standards; and
 - (3) the New Zealand Coastal Policy Statement is not relevant; and
 - (B) Canterbury Regional Council have confirmed that there are no existing resource consents of the kind referred to in section 30(3)(a)
 - (ii) Clause 4A of Schedule 5 (standard freshwater fisheries activity information requirements) (section 14(4)(y)(vi)) information relating to:
 - (A) whether an in-stream structure is proposed (including formal notification of any dam or diversion structure) and the extent to which the proposed structure may impede fish passage; and
 - (B) whether any fish salvage activities are proposed.

- 4 The Application complies with section 42(2)(b) because it:
- (a) outlines the nature and timing of the staging proposed;
 - (b) does not require separate substantive applications to be lodged for any of the stages; and
 - (c) accordingly, does not need to provide an explanation of how each stage meets the criteria in section 22.

- 5 In terms of section 43(2)(c), the explanation of how the substantive application is within the scope of the listed project is provided in the body of this letter at paragraphs 9-15.
- 6 The Application complies with section 44 of the FTAA, as the information described above has been provided in sufficient detail to satisfy the purposes for which it is required.