

## Summary of Information

Waitakere City Council is currently seeking feedback on its draft liquor control bylaw.

Waitakere City Council has determined that a bylaw is the most appropriate means to minimise the harmful and negative effects associated with the consumption of alcohol in public places, including offensive behaviour and drunkenness and violence.

Waitakere City Council has drafted a bylaw in accordance with Local Government Act 2002 ["LGA02"]. The bylaw gives Council the power to prohibit the consumption and possession of alcohol in public places, including the consumption and possession of alcohol or the associated use of vehicles in those public places.

The bylaw may be used to retain existing liquor control areas (with amendments), introduce additional liquor control areas and periods during which the liquor control operates, and provides council with the power to introduce further liquor controls in the future by resolution, including for special events. The bylaw sets out threshold criteria for the establishment of liquor control areas.

While the bylaw itself does not set out specified areas, Council is seeking public comment on areas that may require liquor controls and the reasons why liquor controls are required. Any such proposed areas will be assessed and reported to council for subsequent decision if the draft bylaw is adopted.

The draft bylaw includes exception clauses that allow for the transportation of alcohol through public places during periods when liquor controls are operating. The bylaw includes explanations and definitions to ensure ease and clarity of understanding of the conditions set out in the bylaw.

The bylaw will be enforced by the police under two specific provisions, which differ in regard to the conditions relating to the power of search.

The powers of arrest, search and seizure apply to all liquor control areas unless otherwise specified. Generally, before exercising the power of search the police must provide a person with the opportunity of removing the liquor or the vehicle from any controlled public place. Failure to do so when instructed may result in arrest. If convicted of an offence under the bylaw the maximum fine is \$20,000.

The Waitakere City Council can, however, provide the police with the power to immediately exercise the power to search without further notice on specified dates or in relation to specified events. To empower the police to exercise these powers, the bylaw proposes that Waitakere City Council must specify in a public notice the public place where, and the period when, this power may be exercised by the police. The bylaw states that Notice must be given at least 14 days in advance of this period, and the location of the public place must be indicated by one or more signs.

For a copy of the Statement of Proposal (including draft bylaw) and information about making a submission, please visit the Waitakere City Council Customer Services Centre, Level 2, Waitakere Central; any Waitakere City Council Library; Council's website at [www.waitakere.govt.nz](http://www.waitakere.govt.nz) or contact Council's Call Centre on 839 0400.

The period for making written submissions will open on the 11<sup>th</sup> June 2008 and close at 4.00pm on the 28<sup>th</sup> July 2008. People making written submissions have the option of presenting their submissions at a draft liquor control bylaw hearing, which will be held by Council at a later date. Submissions should be sent to Waitakere City Council, Attention: Roy Hunt, Safe Waitakere Alcohol project, Private Bag 93109, Waitakere].

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## Statement of Proposal

### Introduction

Waitakere City Council is proposing to introduce a liquor control bylaw that prohibits the consumption and possession of alcohol in some public places.

Section 147 of the Local Government Act 2002 ["LGA02"] provides for the Council to make a bylaw for liquor control purposes in relation to any public place under the control of the Council.

The LGA02 requires that Waitakere City Council follows the special consultative procedure to make the proposed bylaw. This Statement of Proposal has been prepared in accordance with the requirements set out in section 86 of LGA02 for the adoption of the special consultative procedure.

It includes:

- the reasons for the proposal;
- consideration of whether a bylaw is the most appropriate way to address the perceived problem;
- whether the proposed bylaw is the most appropriate form of bylaw;
- implications under the New Zealand Bill of Rights Act 1990;
- a draft of the proposed bylaw.

### Reason for proposal

Waitakere City Council has previously introduced a seasonal liquor control area in Piha in response to council, community and police concerns about ongoing problems caused by consumption of alcohol in public places and resultant problems

#### *Problem Definition and outcome sought*

In its strategy "Waitakere City Wide Alcohol strategy 2005" Council has identified that issues relating to alcohol drinking in public places have become a concern to the Council and the community at large over the last few years. The strategy identifies a range of harmful and negative effects including offensive behaviour, drunkenness and violence. The problem can be specifically defined as "community and Council concern for the harmful and negative effects associated with the consumption of alcohol in public places, including offensive behaviour and drunkenness and violence". The solution sought will be the "minimisation of the harmful and negative effects associated with the consumption of alcohol in public places, including offensive behaviour and drunkenness and violence".

### Considerations on whether a bylaw is the most appropriate response

As part of its decision-making process Council is required to identify and assess all reasonably practicable strategies that could provide the desired solution. Council's "Waitakere City Wide Alcohol strategy 2005" identifies five key areas for attention that can be used individually or together to achieve the solutions sought. They are:

#### 1. Supply control

- Reduce the off-licence supply of alcohol to people under 18 years of age
- Reduce the social supply of alcohol to people under 18 years of age
- Advocate for raising the purchase age from 18 to 20 years
- Reduce incidence of intoxication at on-licensed premises

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## **2. Demand reduction**

- Assist demand reduction by disseminating accurate information about alcohol use and promoting moderate alcohol use to those who choose to drink

## **3. Partnerships**

- Continue collaboration with statutory agencies and other strategic partners locally, regionally and nationally
- Support and participate in partnerships with central government agencies to address community safety issues in Waitakere
- Support community-driven initiatives that aim to reduce alcohol-related harm for young people
- Obtain an understanding of community perceptions of alcohol-related issues

## **4. Problem limitation**

- Work to reduce the adverse effects of noise pollution from licensed premises
- Ensure planning decisions about licensed premises consider community concerns over environmental impacts
- Work with communities and enforcement agencies to identify and consider all relevant crime and alcohol-related harm issues
- Support community initiatives that focus on reducing alcohol-related crime and safety issues in areas where liquor bans have been requested
- Implement and review the Control of Liquor in Public Places Bylaw 2003
- Contribute to regional work and research into liquor bans

## **5. Whole-of-Council approach**

- Conduct liquor licensing in a manner consistent with the Liquor Licensing Policy and this strategy
- Align District Plan with the Liquor Licensing Policy to ensure the two documents are consistent with one another
- Ensure that the provisions of the Sale of Liquor Act 1989 are enforced at community functions and public events either organised or funded by the Council
- Support and promote alcohol-free community functions and events
- Ensure that event and function organisers adopt responsible beverage service practice and host-responsibility
- Promote a council environment where council employees and visitors are safe when alcohol is present
- Develop council policies to cover responsible advertising and sponsorship practices including those involving alcohol

Many of the above strategies involve extensive collaboration with key stakeholders and the introduction of further liquor control bylaws is one of the identified tools for achieving the outcomes sought.

Other possible strategies considered include:

1. Maintain status quo - undertake no further work on developing bylaws
2. Advocate for more police in Waitakere City
3. Fund private security patrols
4. Extend Close Circuit Television (CCTV) network
5. Other regulatory mechanism
6. Community patrols

In order to assess the ability of the strategies to address the defined problem, Council has followed the legislative requirements in relation to decision making as set out in section 77 of LGA02. Council has assessed these strategies in terms of the following criteria:

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- (i) the benefits and costs of each strategy in terms of the present and future social, economic, environmental, and cultural well-being of Waitakere City; and
- (ii) the extent to which community outcomes would be promoted or achieved in an integrated and efficient manner by each strategy; and
- (iii) the impact of each strategy on Waitakere City's capacity to meet present and future needs in relation to its statutory responsibilities; and
- (iv) any other matters relevant to Waitakere City

Analysis of the options indicates that the most effective option is likely to be the development and implementation of a liquor control bylaw supported by the five initiatives identified in the Waitakere City Wide Alcohol strategy 2005.

There is strong Police support for this approach.

### **Most appropriate form of bylaw**

In drafting the proposed liquor control bylaw, Council must determine whether the proposed bylaw is the most appropriate form of bylaw. Waitakere City Council believes it has developed the most appropriate form of bylaw.

In drafting the bylaw Waitakere City Council has considered the following issues:

#### ***The views and preferences of the public***

Waitakere City Council is bound to consider the views and preferences of persons likely to be affected by, or to have an interest in the proposed bylaw. As a *coercive* power the liquor control area prohibits the consumption of alcohol in specific public places at specific times. Potentially every resident or visitor to Waitakere City will be positively or negatively affected by the implementation of liquor control areas by Council.

The public consultation process leading up to the adoption by Council of its alcohol strategy – "Waitakere City Wide Alcohol strategy 2005" and subsequent correspondence between Council and the people of Waitakere City, indicates that there is strong public support for the use of liquor control areas. Two public surveys have already been conducted within the last 6 months, and the results indicate very strong public support for the introduction of further liquor bans in Waitakere. Community views will be further reviewed through the special consultative procedure and hearings process.

#### ***Significance***

Under LGA02 Council must consider the significance of an issue, decision or matter. The significance of an issue helps determine the extent of compliance with the decision-making requirements. Council has determined that a bylaw is unlikely to be financially significant for Council, however it is likely to be significant in terms of public interest.

#### ***Appropriateness of appointing enforcement officers***

Section 177 of LGA02 provides Council with the power to appoint enforcement officers in relation to offences against bylaws made under this Act. Enforcement officers can be either council officers or any other person contracted by Council. In considering whether to appoint enforcement officers in relation to the liquor control area bylaw, officers *have* taken into account the following points:

- (i) There would be additional financial costs in training or adding this task to the current security service *delivery* contracts.
- (ii) Enforcement officers *have* no power to detain or arrest an individual, and they would be reliant on the police to continue to enforce the liquor control area.
- (iii) Intoxicated people potentially present serious risk to enforcement officers with resultant Occupational Safety and Health issues for Council.
- (iv) The use of enforcement officers has been excluded from the bylaw as the assessment of this option indicates that this would be a costly and risky undertaking and not an appropriate role for Council.

### ***New Zealand Bill of Rights Act 1990***

In addition to the considerations undertaken above, the proposed bylaw must meet the legal standards of reasonableness, and cannot be inconsistent with the freedoms protected and affirmed in the New Zealand Bill of Rights Act 1990. The proposed bylaw may indirectly impact on the freedom of movement affirmed in section 18 of that Act. However, on balance, the limits being imposed on that freedom of movement are reasonable and justifiable in the circumstances as allowed for in section 5 of the Act. On this basis it is concluded that the proposed bylaw does not breach or unnecessarily interfere with rights protected by that Act.

### **Explanation of Bylaw Provisions**

#### ***Definitions***

The bylaw contains a number of definitions. These definitions have been included to ensure ease and clarity of understanding relating to the conditions set out in the bylaw.

#### ***Exceptions to the liquor control area***

The Local Government Act 2002 provides that bylaws for the control of liquor cannot prohibit the transportation of alcohol to or from private premises (including business premises) within or adjoining the liquor control areas. This is to ensure that businesses are able continue to trade (for example liquor outlets) enabling businesses to receive stock (for example restaurants to receive deliveries of wine), and allowing BYO patrons to take alcohol to a restaurant to consume with a meal. These exceptions also allow residents and their visitors to transport alcohol to or from their residences within the ban area. The bylaw also allows for the transportation of alcohol from and across council controlled public reserve car parks to which the liquor controls apply.

In addition to these statutory exceptions, Council has built into its bylaw the ability to grant dispensation from compliance with any or all parts of the liquor controls [referred to as "special events"] if it is satisfied that full compliance would needlessly or injuriously affect any person or business without any corresponding public benefit.

#### ***Police enforcement and police powers***

The LGA02 provides two specific provisions for enforcement of the liquor control area bylaws by the police. The provisions differ in regard to the conditions relating to the power of search. Generally, before exercising the power of search the police must provide the person with the opportunity of removing the container or the vehicle from the public place. The power of search applies to all liquor control areas unless otherwise specified.

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The Council can, however, ensure that the police may immediately exercise their power to search, without further notice, on specified dates or in relation to specified events. To empower the police to exercise these powers, the bylaw proposes that Council must specify in a public notice the public place where, and the period when, this power may be exercised by the police. Notice must be given at least 14 days in advance of this period. Council must indicate the location of the public place by one or more clearly legible and conspicuous signs. These must be located on, or adjacent to, the place to which the notice relates, unless it is impracticable or unreasonable to do so.

### ***Fines for breach of bylaw***

A fine is the only available penalty option for breach of a bylaw under section 239 of LGA02. The court has a general discretion to impose a fine up to the maximum amount of \$20,000.

### ***Specific Criteria for Adding Ban Areas***

The proposed bylaw provides specific criteria for the implementation of liquor control areas. These criteria have been included in the draft bylaw to ensure a consistent approach to specifying public places in which the controls apply, and to ensure that the continuance and introduction of any further liquor control areas are reasonable - that is, that there is demonstrable need for the liquor control area. These criteria are in addition to the decision making criteria required by the LGA 2002.

### ***Appropriateness of consultation***

The draft bylaw contains a requirement that before specifying a public place the Council must consider whether it is necessary to consult the public. The level of consultation required, if any, will depend on the community views already known to the Council and, if undertaken, will be relative to the level of significance of the proposed liquor control.

### ***Procedure for adding or removing liquor control areas***

The LGA02 provides Waitakere City Council with the power to leave any matter or thing to be regulated, controlled, or prohibited by the local authority by resolution either generally, for any specified classes of case, or in a particular case (section 155(2)). The proposed bylaw has incorporated this into the procedure for adding or removing liquor control areas. In other words, the locations to which the controls apply are not technically part of the bylaw itself. These powers provide Council with greater flexibility for introducing or removing controls without incurring the significant time and cost burden of the process for amending or removing a bylaw. For example it would be cumbersome, time consuming, costly and inconvenient for Waitakere City Council to undertake the full special consultative process to amend the bylaw to introduce a temporary event ban.

### ***Appropriateness of signage***

There are no specific provisions under the LGA02 requiring signage indicating the existence of liquor control areas, other than those required by the specific provision providing the police with the power of search without further notice (see Police enforcement and Police powers). However police feedback on the issue has indicated that the signs make enforcement of the liquor control area easier, and has requested that Council continues to place appropriate signage in and around the areas regulated under the liquor control bylaw.

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## ***Liquor control areas***

While the current bylaw itself only included one specific liquor control area, Council considers it an appropriate part of the consultation process to signal areas that it is currently considering - in the event that the draft bylaw is adopted. The following sections indicate its preliminary thinking in that regard.

The bylaw and the powers contained within the bylaw may be used to maintaining the existing bans [as detailed below] as well as for implementing further liquor controls, subject to the special consultative procedure. Proposed areas will be reviewed as required by the bylaw. Any additional areas identified by this process as requiring liquor controls will be reviewed to ensure that there is a demonstrable need for implementing further liquor controls, and to ensure reasonableness of the implementation of the proposed bylaw.

### ***Existing liquor control areas (with amended times)***

No person may, between the hours of 5.00pm on any day in a Holiday Period and 5.00am on the following day bring liquor into, possess liquor in or consume liquor in any Public Place within those parts of Marine Parade South, Piha South Road Reserve, Piha Domain, Lion Rock, Marine Parade North, North Piha Strand, Piha Esplanade Reserve, Les Waygood Park, North Piha Road and North Piha Esplanade at

### ***Proposed new liquor control areas***

#### Central Business Districts (C.B.D's) – (see below)

Henderson, New Lynn, Glen Eden, Westgate and Titirangi. -  
Hours - 24 hours, 7 days a week.

Te Atatu Peninsula  
Hours- 6.00pm to 6.00am the following day

#### Parks and Reserves

Central Park (Trusts stadium), Ranui Domain, Starling Park, Te Pai Park, Waikumete Cemetery, Ceramco Park, Kaurilands Domain, Parris Park, Harbourview Reserve, Taipari Strand and Chapman Strand, Gloria Park, Riverpark Reserve, Helena Park, Woodside Reserve, Paremuka Lakeside, Archibald Park, Brains Park, Ken Maunder Park and Titirangi Beach

Hours - 9.00pm to 6.00am the following day, Thursday, Friday, Saturday

Piha - Status quo (Current provisions retained)

### ***Further liquor controls***

In addition to the areas listed above council is also seeking public comment on any other areas that may require liquor controls and the reasons why liquor controls are required.

#### *Temporary liquor controls*

These bans have been an effective tool in assisting the police in managing alcohol-related disorderly behaviour and criminal offending, and enhancing public safety. The Police have requested that Waitakere City Council continue to use these specified day liquor controls. The bylaw provides specified day and specified event categories for temporary

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liquor controls of this nature. The specified day category may be used to implement liquor controls in specified public places on a number of long weekends (note some public holidays always fall on a weekend and are covered by existing or proposed liquor controls]. Temporary liquor controls can be introduced by resolution specifying the place and period over which they will operate. Where necessary the bylaw also provides Council with the power to provide the police with the ability to undertake searches without further notice (see Police powers).

### ***Public notices***

Council will be required to publicly notify the adoption of this bylaw as per the public notice requirements of section 157 of LGA 2002. In addition to the legal requirements for public notification Council has previously undertaken further public notification initiatives to raise public awareness of the introduction and existence of new and existing bans. It recommended that a similar public notification process is followed for the new bylaw in order both to comply with the revised special consultative procedure under the LGA02, and also to be consistent with the nominated tools contained in its Alcohol Strategy.

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**Waitakere City Council**  
*Te Taiāo o Waitakere*

# **Proposed New Liquor Ban Areas**

## **Information Pack**

**June 2008**

**Included within:**

- **Summary**
- **Frequently asked questions**
- **Maps of proposed new liquor ban areas**
- **Submission form**

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## Summary

The Waitakere City Council is considering introducing new liquor bans areas in the following areas:

### Central Business Districts (CBDs)

- Henderson
- New Lynn
- Glen Eden
- Titirangi
- Westgate
- Te Atatu Peninsula

### Parks and Reserves

- Central Park (Trusts stadium),
- Ranui Domain,
- Starling Park,
- Te Pai Park,
- Waikumete Cemetery,
- Ceramco Park,
- Kaurilands Domain,
- Parrs Park,
- Harbourview Reserve,
- Taipari Strand
- Chapman Strand,
- Gloria Park,
- Riverpark Reserve,
- Helena Park,
- Woodside Reserve,
- Paremuka Lakeside,
- Archibald Park,
- Brains Park,
- Ken Maunder Park,
- Titirangi Beach

Before making it's final decision the Waitakere City Council is asking the public for their views. Submissions can be made to the council between 11th June 2008 and 28 July 2008.

Information, maps of the proposed new liquor ban areas and answers to frequently asked questions are included in this information pack.

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## Hours

The liquor bans would apply from;

- Central Business Districts (Henderson, New Lynn, Westgate, Titirangi, Glen Eden) 24 hours, seven days per week.
- Te Atatu Peninsula - 6.00pm - 6.00am
- All other identified areas (Parks and Reserves) - 9.30pm - 6.00am on Thursday, Friday and Saturday.
- Piha – current provisions retained

A preliminary assessment identified these areas as possibly having significant alcohol related problems that justify a liquor ban. If adopted, a person is not allowed to consume or possess liquor, or to use a vehicle to consume or possess liquor in any public place within the ban area during the times stated.

Exemptions apply to the transport of liquor to allow residents and their visitors to transport liquor to and from their homes. The council may grant dispensation to allow liquor at special events held within a liquor ban area.

This information pack and submission forms are available on the council's website [www.waitakere.govt.nz](http://www.waitakere.govt.nz) (keyword: bylaws); and from Waitakere City Council libraries, or the main council reception area situated on level 2, 6 Henderson Valley Road, Henderson or by contacting the council's call centre on 839-0400

Submissions must be received by 4pm Monday 28 July 2008

**Post your submission to:**

Waitakere City Council  
Private Bag 93109  
Henderson  
Waitakere City  
Attention : Roy Hunt, Safe Waitakere

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## Frequently Asked Questions

**Q: Why is the Waitakere City Council considering liquor bans in these areas?**

**A:** The Council previously adopted a liquor ban in Piha to address community, police and council concern for the harmful and negative effects associated with the consumption of liquor in public places, including offensive behaviour, drunkenness and violence. All of the areas contained in the draft bylaw have been included because of the degree of identifiable alcohol related problems experienced within these respective areas. Other initiatives include liquor licensing, education, strengthening relationships, and advertising.

**Q: Is there a map of the proposed new liquor ban area?**

**A:** Yes. Maps of the proposed new liquor ban areas are contained in this information pack.

**Q: What does a liquor ban mean?**

**A:** Within a liquor ban area, a person is not allowed to consume or possess liquor, or to use a vehicle to consume or possess liquor in. Police have the power to search bags or vehicles, seize liquor found, and to arrest persons who are committing an offence (i.e. consuming or in possession of alcohol), refusing to comply with a request to leave the area, or to surrendering liquor in their possession. If convicted, the maximum fine a court may impose is \$20,000.

**Q. What are the exceptions to the liquor control area?**

**A:** The bylaw does not affect the ability of people to transport liquor to or from private premises (including business premises) within or adjoining a liquor ban area. This allows businesses to receive stock, BYO patrons to take liquor to a restaurant, and residents and their visitors to transport liquor to and from their residences.

The bylaw does not affect the consumption of liquor associated with outdoor dining at restaurants and cafés where the business has the appropriate liquor licence.

The council may grant dispensation to allow liquor at special events held within a liquor ban area.

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**Q: Who enforces liquor bans?**

**A:** The New Zealand Police have powers under the Local Government Act 2002 to enforce liquor bans. The Waitakere City Council does not have any powers to enforce liquor bans. The role of Waitakere City Council is to identify where liquor bans are appropriate.

**Q: Are there other liquor ban areas?**

**A:** Yes. The council adopted a seasonal liquor ban in 2003 at Piha. This ban will continue as part of the draft bylaw.

**Q: Can I have a say on the proposed new liquor ban areas?**

**A:** Yes, submissions on the proposed new liquor ban areas can be made between 11th June 2008 and 28 July 2008. Anyone who makes a written submission can also make an oral submission to a committee of the council. Those persons will be notified of hearing dates once determined. A submission form is attached to this information pack.

**Q: Where can I get more information? Where can I get more submission forms?**

**A:** This information pack and submission forms are available on the council's website [www.waitakere.govt.nz](http://www.waitakere.govt.nz) (keyword: bylaws), from the Waitakere City Council libraries, or council's Customer Service Centre, 6 Henderson Valley Road, Henderson from 11th June 2008 and 28 July 2008.

**Q: Can I suggest liquor bans in areas not already existing or proposed?**

**A:** Yes. However, all requests for areas to be included must have substantiated reported evidence of problems associated with alcohol consumption. Typical problems may include violence, broken bottles, noise etc.

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15 January 2008

WAITAKERE CITY COUNCIL

16 JAN 2008

Philip Brown  
Group Manager  
Planning and Community Services  
Waitakere City Council  
Private Bag 93109  
Waitakere City

005494

Dear Sir

**Submission on City of Waitakere Proposed Plan Change 22 - Whenuapai Airport Special Area**

At its 12/13 December 2007 meeting, North Shore City Council's Strategy & Finance Committee reconsidered the Council's submission on Waitakere City Council's Proposed Plan Change 22 - Whenuapai Airport Special Area, and resolved:

*That the Council wishes to endorse its submission to the Waitakere City Council's Plan Change on the following:*

- (a) *Retention of the existing asset of the Airbase infrastructure at Whenuapai*
- (b) *Support of Policy 11.53 which gives priority to Defence activities*
- (c) *Support of Policies 10.24 and 11.58 in regard to hazardous substances.*

*That the Council wishes to withdraw its support in the submission for any commercial activities, including commercial flights, at Whenuapai Airbase.*

*That the Council is of the view that the current rural zone (Countryside Environment) is the appropriate underlying zone.*

The Committee also resolved that Waitakere City Council should be informed of this resolution.

North Shore City Council still wishes to be heard in support of its submission.

Yours Sincerely

Phill Reid  
Manager, Environmental Policy and Planning  
North Shore City Council

Chief Executive	
Corporate Services	
City Services Moselle	✓
Consultancy Services	
ECO - WATER	
Strategic Group	
Consent Services	
Field Services	

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Chief Executive's Office  
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02 MAY 2008  
Philip Brown

29 April 2008

WAITAKERE CITY COUNCIL

- 2 MAY 2008

Vijaya Vaidyanath  
Chief Executive  
Waitakere City Council  
Private Bag 93109  
Waitakere City

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Dear Vijaya

**Appointment of Independent Commissioners to Consider City of Waitakere Proposed Plan Change 22 - Whenuapai Airport Special Area**

At its 15 April 2008 meeting, North Shore City Council's Strategy & Finance Committee resolved:

*That the Chief Executive write to Waitakere City Council requesting that Independent Commissioners be appointed to hear Plan Change 22.*

You will be aware that North Shore City Council has consistently sought that independent hearing commissioners be appointed to hear this plan change. This is a very important matter for the Council, and North Shore City residents, and I trust that you will ensure it is given due consideration.

Yours sincerely

John Brockies  
Chief Executive

Chief Executive	✓
Corporate Services	
City Services Moselle	
Consultancy Services	
ECO - WATER	
Strategic Group	
Consent Services	
Field Services	

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