

EXTRAORDINARY MEETING

OF

WELLINGTON CITY COUNCIL

AGENDA

Time: 2:00 pm
Date: Thursday, 16 April 2020
Venue: Ngake (16.09)
Level 16, Tahiwī
113 The Terrace
Wellington

MEMBERSHIP

Mayor Foster
Councillor Calvert
Councillor Condie
Councillor Day
Councillor Fitzsimons
Councillor Foon
Councillor Free (Deputy Mayor)
Councillor Matthews
Councillor O'Neill
Councillor Pannett
Councillor Paul
Councillor Rush
Councillor Sparrow
Councillor Woolf
Councillor Young

Have your say!

You can make a short presentation to the Councillors at this meeting. Please let us know by noon the working day before the meeting. You can do this either by phoning 04-803-8334, emailing public.participation@wcc.govt.nz or writing to Democracy Services, Wellington City Council, PO Box 2199, Wellington, giving your name, phone number, and the issue you would like to talk about. All Council and committee meetings are livestreamed on our YouTube page. This includes any public participation at the meeting.

TABLE OF CONTENTS

16 APRIL 2020

Business	Page No.
1. Meeting Conduct	5
1.1 Karakia	5
1.2 Apologies	5
1.3 Announcements by the Mayor	5
1.4 Conflict of Interest Declarations	5
1.5 Confirmation of Minutes	5
1.6 Items not on the Agenda	6
1.7 Public Participation	6
2. General Business	7
2.1 Sewerage Repairs - Mt Albert Tunnel Presented by Mayor Foster	7
3. Public Excluded	23
3.1 Appointment of external member to Finance, Audit and Risk Subcommittee Presented by Mayor Foster	25

1. Meeting Conduct

1.1 Karakia

The Chairperson will open the meeting with a karakia.

Whakataka te hau ki te uru,	Cease oh winds of the west
Whakataka te hau ki te tonga.	and of the south
Kia mākinakina ki uta,	Let the bracing breezes flow,
Kia mātaratara ki tai.	over the land and the sea.
E hī ake ana te atākura.	Let the red-tipped dawn come
He tio, he huka, he hauhū.	with a sharpened edge, a touch of frost,
Tihei Mauri Ora!	a promise of a glorious day

At the appropriate time, the following karakia will be read to close the meeting.

Unuhia, unuhia, unuhia ki te uru tapu nui	Draw on, draw on
Kia wātea, kia māmā, te ngākau, te tinana,	Draw on the supreme sacredness
te wairua	To clear, to free the heart, the body
I te ara takatū	and the spirit of mankind
Koia rā e Rongo, whakairia ake ki runga	Oh Rongo, above (symbol of peace)
Kia wātea, kia wātea	Let this all be done in unity
Āe rā, kua wātea!	

1.2 Apologies

The Chairperson invites notice from members of:

1. Leave of absence for future meetings of the Wellington City Council; or
2. Apologies, including apologies for lateness and early departure from the meeting, where leave of absence has not previously been granted.

1.3 Announcements by the Mayor

1.4 Conflict of Interest Declarations

Members are reminded of the need to be vigilant to stand aside from decision making when a conflict arises between their role as a member and any private or other external interest they might have.

1.5 Confirmation of Minutes

The minutes of the meeting held on 9 April 2020 will be put to the Council for confirmation.

1. 6 Items not on the Agenda

The Chairperson will give notice of items not on the agenda as follows:

Matters Requiring Urgent Attention as Determined by Resolution of the Wellington City Council

The Chairperson shall state to the meeting.

1. The reason why the item is not on the agenda; and
2. The reason why discussion of the item cannot be delayed until a subsequent meeting.

The item may be allowed onto the agenda by resolution of the Wellington City Council.

Minor Matters relating to the General Business of the Wellington City Council

The Chairperson shall state to the meeting that the item will be discussed, but no resolution, decision, or recommendation may be made in respect of the item except to refer it to a subsequent meeting of the Wellington City Council for further discussion.

1. 7 Public Participation

A maximum of 60 minutes is set aside for public participation at the commencement of any meeting of the Council or committee that is open to the public. Under Standing Order 3.23.3 a written, oral or electronic application to address the meeting setting forth the subject, is required to be lodged with the Chief Executive by 12.00 noon of the working day prior to the meeting concerned, and subsequently approved by the Chairperson.

2. General Business

SEWERAGE REPAIRS - MT ALBERT TUNNEL

Purpose

1. This report formally summarises the most recent professional advice from Wellington Water Limited (WWL) to the Council regarding the failure of the sewers, including options being pursued, the impact of COVID-19, risks involved and updated cost estimates. COVID-19 has delayed the drafting of this report. The report also seeks Council approval to debt fund the repair over a ten year period.

Recommendation/s

That the Council:

1. Receive the information.
2. Note the uncertain environment in which Wellington Water Limited (WWL) is operating.
3. Note the risks that WWL has identified associated with the repairs.
4. Note the WWL revised estimate ranges of \$4m-\$5m repair cost and \$8.7m-\$11.1m trucking cost, assuming repairs are effected by mid to late May 2020.
5. Note that each week beyond mid-late May WWL will incur an estimated trucking cost of around \$650k.
6. Agree to fund WWL for repair and transport costs based on WWL's estimates above.
7. Agree to fund this unexpected but unavoidable cost through debt, in order to spread the cost across ten years.

Background

2. Wellington City Council owns the City's public wastewater infrastructure assets. Wellington Water Limited is funded to manage and operate the assets on Council's behalf, and to provide expert advice to Council on wastewater investment and management. Two key sewers within Mt Albert tunnel failed in mid-January 2020. As events have unfolded, the Mayor, Portfolio Spokesperson and Council have been kept abreast of developments and associated costs.
3. Two pipelines transport 1,100m³ daily of sewage treatment by-product, known as sludge, from the Mōa Point Wastewater Treatment Plant to Careys Gully dewatering plant, adjacent to the Southern Landfill. The pipelines travel between Cockburn Street Kilbirnie and Dover Street Island Bay, through a 1.8km wastewater tunnel, beneath Mt Albert. The pipelines are high pressure, and are encased in concrete within the base of the tunnel, which itself conveys raw sewage in the opposite direction (towards Mōa Point).

4. *Sludge* is the solid waste by-product from the wastewater treatment process. In simple terms, the treatment plant first removes inorganic materials (such as wet wipes) which are termed *screenings*. The wastewater is then treated, first by settling solids out, biologically treating the water, then ultraviolet disinfection. The treated water is discharged via a long outfall pipe into Cook Strait. The solids removed in this process are sludge. It is not treated and has a high concentration of viruses and bacteria. Sludge is pumped as a slurry to Careys Gully, where further water is removed. The solid waste is disposed in the Southern landfill, and the water is treated and returned to Moa Point.
5. The assets are owned by Wellington City Council and managed on Council's behalf by Wellington Water Limited (WWL). 6. In mid-January 2020 both pipes carrying sludge failed along a section of the Mt Albert tunnel. The pipelines are encased in concrete at the bottom of the 1.8km sewer tunnel, and are very difficult to access.
7. In order to prevent loss of sludge into the environment, on 22 January WWL urgently arranged for the sludge to be transported by tanker, and commenced analysis to determine repair options.
8. Sludge is currently being transferred from the Moa Point Wastewater Treatment Plant to the landfill using road tankers operating 24 hours a day. Transferring sludge using tankers has high risk elements including environmental hazards from spills and odour, and health and safety risk to staff in addition to significant operating costs. Trucking has been a cause of concern to residents, and presents logistic challenges at the Southern Landfill. Truck movements have during the Level 4 lockdown average around 100 per day.

Discussion

9. In mid-March WWL advised that it had resolved how to repair the pipeline. The repair involves sourcing a liner and specialist technical expertise from Germany, pulling the liner through the existing pipe, and expanding it to form a permanent fix. At that time, the repair date was scheduled for mid-April. The estimated cost of the repair at that time was around \$4m, and the estimated cost of trucking sludge until repairs could be effected was \$6.8M.¹⁰
10. On 24 March the Prime Minister announced that New Zealand was to move to COVID-19 Alert Level 4, effectively closing borders to the normal movement of people. The German government has placed similar restrictions around movement of people and working. As a result, WWL has reported a delay in the production and shipping of the liner, and difficulties in booking travel for the technical experts.
11. As at 8 April 2020, WWL has received approval for the technical experts to enter New Zealand, has obtained visas, and booked a place on an Air New Zealand repatriation flight leaving Germany on 14 April 2020. WWL has procured isolation facilities and care arranged in Auckland. There are six experts in the team, which allows for redundancy in case any of the team become ill.
12. However, there is still risk while the COVID-19 responses worldwide evolve.
13. WWL advises that the current plan is to:
 - a) Proceed with the liner solution above, which includes initial patches over the breaks.

- b) As a contingency, prepare a temporary solution involving the initial patch to one pipeline and low pressure pumping to Berhampore with a temporary pump station installed in the golf course. This will be deployed in the event there are further delays, and
 - c) Continue with trucking the sludge, and continue work on streamlining processes and costs.
14. The root cause of the failure is being investigated by WWL and an outcome is expected early May.
15. WWL's current estimates for the plan, based on the liner solution being completed in mid-May are now in the range of \$4m-\$5m to complete the capital works and \$8.7m to \$11.1m operating costs for trucking the sludge.
16. These WWL estimates are "level 0" – which means they have a high level of unknown factors and risk, hence the wide range in figures.
17. These costs are unbudgeted and cannot be funded through rates. Any ability to reprioritise budgets was effectively subsumed by a separate sewer failure on the corner of Willis and Dixon Streets in December 2019. Officers propose to debt fund this repair, opex and capex, over a ten year period. There is provision within the Local Government Act for the Council to debt fund these works, meaning that the impact on 2020/21 rates funding is forecast to be 10% of the total cost (\$1.27m-\$1.61m). Officers propose that this will be consulted in the Annual Plan.

Options

18. Officers requested that WWL provide advice on the options assessed in determining the current course of action. WWL advises the following:

Option 1: Liner

Breaks in the pipelines are patched, then a polyester liner is installed through the pipeline. The lining is a permanent solution. With installation by the manufacturer, the liner provides the required design life of 10 year and is guaranteed for 50 years, which makes future failure and similar costly response much less likely.

Estimated completion date: mid - late May 2020

Estimated capital cost: \$4m-\$5m

Estimated operating cost: no change to current

Option 2: Low Pressure Pumping

This is a temporary solution, where once the patches for the liner solution are in place, the pipeline pressure is reduced to 10%. A temporary pump station is installed at the Berhampore golf course (on the Town Belt) that meets the pressure and flow requirements to convey the sludge to Careys Gully.

This reduces the risk profile and cost for conveying sludge from the Moa Point Treatment Plant to Carey's Gully by road tankers, but still carries some risk. This option would be deployed if it became clear that Option 1 is no longer viable.

Estimated time to establish and commence: 2-3 weeks

Estimated capital cost to set up: \$0.75m

Estimated operating costs (diesel, generator and pump running costs): \$0.35m per week

Option 3: Temporary Pipeline in Roof of Tunnel

This option is at preliminary thinking only. It would involve securing a temporary pipeline attached to the roof of the sewerage tunnel. This option would require prolonged access to the tunnel which poses a high health and safety risks to the installers. It will only be progressed if Options 1 and 2 fail.

While options 1-3 are being implemented the cost of trucking sludge of \$0.65m per week will continue. If the repair options fail, then:

Option 4: Continue trucking operation

This is currently underway and is an effective transfer that is mature in process. There are ongoing issues and risks around the impact on the community, health and safety, and high operating costs. Costs are currently under review by both WWL and the supplier to see if they can be rationalised.

Current operating cost: \$0.65m per week

19. During their options analysis, WWL sought legal advice and undertook a brief community survey around the potential to discharge into the sea via a 1.8km-long outfall. The advice states that any decision to discharge sludge into the sea would need to rely on the *emergency works* provisions of the RMA. WWL's view is that this is unlikely, that discharge into the sea is not culturally viable and would cause strong public reaction.
20. The relevant WWL Board papers are attached to this report.

Conclusion

21. WWL's advice is that a permanent fix is in progress and that, although it is not without risk, is proceeding in accordance with a COVID-19 revised time frame. In the meantime, WWL advises that the operational solution to truck the sludge is working well, avoiding impact to the environment, although it is carrying a heavy cost.
22. WWL's financial forecasts, based on the success of the permanent solution, are estimated to be in the range of \$4m to \$5m capex and \$8.7m to \$11.1m opex, with an additional \$650k for each week that the repair extends beyond mid-late May.

Attachments

- Attachment 1. WWL Board recommendations 13 March 2020 [↓](#)  Page 12
- Attachment 2. WWL Board recommendations 9 April 2020 [↓](#)  Page 14

Author	Mike Mendonca, Chief Resilience Officer
Authoriser	Moana Mackey, Acting Chief City Planner

SUPPORTING INFORMATION

Engagement and Consultation

Not applicable

Treaty of Waitangi considerations

Not applicable

Financial implications

This is a significant cost that is the result of an extraordinary situation with an unexpected double pipe failure that has been exacerbated by a global pandemic. There is little choice other than to accept this unbudgeted cost.

Officers will continue to ensure that WWL is undertaking everything possible to continue to mitigate costs and keep the Council informed.

Policy and legislative implications

The proposal reflects the urgent nature of the works required.

Risks / legal

Not applicable

Climate Change impact and considerations

Not applicable

Communications Plan

Not applicable

Health and Safety Impact considered

Not applicable

**Special Board Meeting – 13 March 2020****Mt Albert Sludge Slurry Pipeline – Recommendations**

- a) **Notes** the Chief Executive authorised the emergency works on 17 January 2020 to avoid sludge slurry being discharged into the environment;
- b) **Notes** this emergency work has been funded from existing opex budgets and currently lies within the Chief Executive’s Delegated Financial Authority;
- c) **Notes** the estimated cost to continue to manage sludge disposal and complete a renewal of the pipeline is \$10.8m, made up of \$6.8m opex and \$4m capex;
- d) **Notes** the emergency response continued until we delivered the repair methodology and estimated cost, which was done on 27 February 2020;
- e) **Notes** the Chief Executive incurred expenditure of \$2.9m to the end of February;
- f) **Notes** that since WCC has received the estimated cost until the renewal is completed, WCC have been working on funding options prior to seeking council approval for the increases in opex and capex over and above current approved budgets;
- g) **Approves** the Chief Executive continuing to incur opex payments of up to \$6.8m and to continue to develop a capex solution, estimated to cost \$4m;
- h) **Notes** the sludge pipe liner has been ordered ex Germany and is now under considerable risk of delay due to the global impacts of Covid 19;
- i) **Requests** the Chief Executive to advise WCC of the rapidly changing risk profile for delivery of the liner and subsequent impact on both the time to complete the renewal and consequential opex costs; and

-
- j) **Notes** Wellington Water are investigating alternative methodologies to temporarily manage this situation should delays occur.



Board Meeting

Paper number: 043-07
Board meeting: Thursday, 9 April 2020
Agenda no: 2.4
Prepared: Stephen Wright, Major Projects, Network Development & Delivery
Approved: Tonia Haskell, General Manager, Network Development & Delivery
Recommended: Colin Crampton, Chief Executive

Mt Albert Sludge Project

Purpose

1. To update the Board on the Mt Albert Tunnel project and therefore on the sludge trucking operation.

Recommendation

2. It is recommended that the Board:
 - a) **Notes** the plans in paper No 4 to your 13 March meeting concerning the Mt Albert Tunnel project and sludge trucking operation have been significantly affected by the spread of the COVID 19 virus both in NZ and worldwide;
 - b) **Notes** one of the liners and associated equipment is manufactured in Germany and will be either brought to NZ by Air NZ on 14 April or by booked international cargo on 24 April;

- c) **Notes** the manufacture of the second liner has been delayed by over a month and will now be shipped as international cargo aimed to be in Wellington mid-May;
- d) **Notes** the NZ Government has exempted six workers from Germany to come out to NZ to install the liners and those six personnel are booked on a 14 April Air NZ flight;
- e) **Notes** that while the manufacturing and travel risks have been reduced, the larger looming risk is the ability to pull the liner through the existing pipework;
- f) **Notes** the most likely date for completion of the work has slipped back to mid May 2020 with contingency to the end of May 2020;
- g) **Approves** the release of updated estimates to Wellington City Council of Capex (\$4M - \$5M) and Opex (\$8.7M - \$11.1M) based on a mid-May to late May finish;
- h) **Notes** the cost of trucking (\$650K per week) could be mitigated by a temporary solution which we are developing and which should be ready to implement in approximately two to three weeks if it is needed;
- i) **Notes** that should the liner option fail at the first and second attempt, and the temporary solution also fails, then the trucking of sludge will need to continue until a second permanent solution can be implemented which is expected to take 3 to 6 months;

Summary

3. The Covid-19 virus has severely disrupted a well organised plan to fix the Mt Albert sludge pipelines which burst in January 2020.
4. Over the last couple of weeks we have been endeavouring to reorganize things taking into account border lockdowns and uncertainty surrounding the timing of international flights and delays to the manufacture of our liners in Dusseldorf. Our plan is reforming but the target date for completion has slipped back to mid-May and could slip further to the end of May.
5. WCC has entered a period of financial difficulty with revenues reducing and a need to set rates at a level when our community is dealing with Covid-19. Every week the cost of trucking the sludge is \$650K so everyone is keen to see it stop. We have developed a temporary alternative to put in place if the liner work is unsuccessful. It will halve the cost of transporting the sludge and will remove all the trucks off the road.
6. It's not easy to create certainty in an uncertain world.

Attachments

7. There is one attachment to this paper:
 - a) Attachment A: Cost Estimates - 13 March 2020 board paper estimate and the updated estimate as at 7 April 2020.

Context

8. On or around the 17 of January 2020, one of the high pressure sludge slurry pipelines connecting Moa Point to Carey's Gully at the landfill, failed. As we switched flow to the second back-up line, the backup also failed. Our immediate response was to contain all the sludge slurry at the Moa Point plant while we organised alternative options.
9. We settled on the alternative option of trucking sludge from Moa Point to Carey's Gully. This involves approximately 100 to 130 trips every 24 hours and costs approximately \$650K per week.
10. We have settled on a permanent option. This involves pulling a flexible liner through the existing pipes, expanding them and then making the system operational again.
11. We were well advanced with all our planning when the COVID-19 virus outbreak occurred. This has significantly disrupted the manufacture of the liners and put in doubt our international travel arrangements.
12. In the Board paper of 13 March 2020 we advised you the most likely cost for the project was \$10.8M comprising of \$4M (Level 0 Estimate) Capex and \$6.8M (note, in some parts of the paper it said \$6.6M) Opex for a completion date of the end of April 2020.

What has changed?

13. The outbreak of COVID-19 across NZ and across the world, has considerably disrupted our planning to affect a permanent repair. The key elements of this are:
 - a) The lockdown of our borders to foreign nationals;

- b) Delays in the manufacture of the liners due to COVID-19 in Germany; and
 - c) Uncertainty in the ability to transport both people and equipment from Germany to NZ.
14. At the local end, Brian Perry Civil and other subcontractors, continue to make the site ready as per normal as the project was categorised as an essential service and therefore has continued uninterrupted.
15. Over the last week we have had two pieces of good news that significantly reduces the risk on the project. Firstly, the Government has exempted the crew from Germany from our border controls. They can now enter the country but they must self-isolate for 14 days. Secondly, we have secured passage for the crew and possibly some freight on an Air NZ flight from Frankfurt to Auckland on the 14 April 2020.
16. We will now freight the liners at separate times because the first liner is manufactured and will be flown out on the 24 April. The second liner has been delayed until 4 May. We will begin work with the first liner on or about the 8 May and move to the second liner when it arrives in the country.

When do we think we will complete the repair?

17. Based on planning done to date, we expect the first liner to be in place and reconnected to the system on or about the middle of May. The remaining risk, and it's a big one, is can we pull the liner through the pipe, expand it and make the system operable again.
18. If we encounter problems with the first liner, we will have a second attempt but this will mean the system would not be operable until the end of May.

19. If both failed then we would be looking at a very significant delay to affect a permanent solution as we would need to deploy the next best solution which is to suspend a new pressure pipe from the ceiling. This option is being worked on in parallel should the preferred option fail.
20. The problem with a failure to affect a permanent solution is that trucking would need to continue at \$650K per week which is very expensive.

Alternative options to trucking the Sludge

21. Last weekend, a WCC Councillor suggested we revisit the option of using the long outfall structure. We have reviewed our work over the last three months and found that because we have a feasible alternative option, it would be unlawful to discharge untreated sludge from the long outfall structure without a new consent. Seeking such a consent looks very difficult.
22. Advice from wider stakeholders, including mana whenua, suggests there is little support to endeavour to consent to a discharge of untreated sludge from the long outfall structure.
23. The costs of continuing to truck the sludge are very high and if the permanent solution is not successful, then ongoing trucking will put significant pressure on Council funding at a time when revenues have been affected by the COVID-19 lockdown and the Council is contemplating lower than planned rate increases.
24. To mitigate this cost we have been investigating a temporary option which consists of running sludge through the tunnel at low pressure and then building a new pump station in Berhampore to pump the sludge to Carey's Gully. This option has had technical review and approval, to deploy if the permanent liner solution is delayed or no longer viable. It carries risk in that it is still using the pipelines in their current fragile state, so we don't think it is a long term solution.

25. Our current estimate (level 0) to establish the pumping option is around \$750K plus \$350K a week to operate (diesel, operators, and hire of the pumps). These costs would be additional to the current project and would be firmed up should the permanent solution not be successful. The benefit of the alternative is all trucking would cease but the weekly cost is still expensive.

What are the current costs?

26. Estimating costs in the current environment is very tricky. We need to be careful we are not getting too detailed in an environment where there is a lot of uncertainty. That said, our plans do appear to be settling so we have estimated the cost of the work based on a range of delivery dates between mid-May and the end of May. Should the work continue past the end of May, we would need to stop and re-estimate it from first principles because it will most likely be based on the alternative temporary sludge disposal system and a revised permanent solution (see Attachment A).
27. Note, we provided WCC with some indication of trucking costs over the weekend when there was urgency for a Council report this week. As it turned out the Council report goes up next week which allows us to engage with you first on a properly constructed estimate.
28. We do need to be very clear success with the permanent solution is not guaranteed, although, we believe it has a high chance of success and we have two opportunities to get it right.

Attachment A – Cost Estimates

SLUDGE TANKERING

Forecast versus Actual (Finish mid May)								
Month	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Total	Covid19 Risk
Working Days	8	29	31	30	15			10%
Forecast (27 Feb)	\$ 400,000.00	\$ 1,899,745.00	\$ 2,492,000.00	\$ 1,982,000.00			\$ 6,773,745.00	
Actual	\$ 400,000.00	\$ 2,020,745.00	\$ 2,902,778.46				\$ 5,323,523.46	
Average rate per day (to date)	\$ 50,000.00	\$ 65,425.54	\$ 78,287.11					
Forecast (7 Apr)	\$ 400,000.00	\$ 2,020,745.00	\$ 2,902,778.46	\$ 2,348,613.29	\$ 1,174,306.65		\$ 8,846,443.40	\$ 9,731,087.74

Forecast vs Actual (Finish end of May)

Month	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Total	Covid19 Risk
Working Days	8	29	31	30	31			10%
Forecast (27 Feb)	\$ 400,000.00	\$ 1,899,745.00	\$ 2,492,000.00	\$ 1,982,000.00			\$ 6,773,745.00	
Actual	\$ 400,000.00	\$ 2,020,745.00	\$ 2,902,778.46				\$ 5,323,523.46	
Average rate per day (to date)	\$ 50,000.00	\$ 65,425.54	\$ 78,287.11					
Forecast (7 Apr)	\$ 400,000.00	\$ 2,020,745.00	\$ 2,902,778.46	\$ 2,348,613.29	\$ 2,426,900.40		\$ 10,099,037.15	\$11,108,940.87

REMEDIAL WORKS

	Level 0 Estimate	Covid19 Risk 25%
Lining option (Including investigations)	\$ 4,000,000.00	\$ 5,000,000.00
Intermediate pumping station option		
Establishment	\$ 750,000.00	Included
Operating	\$ 350,000.00	Included

Notes

Covid19 Risk Risk for sludge tankering partly included in cost to date, but full impact added to lining for flights and freight impacts

3. Public Excluded

Recommendation

That the Council:

1. Pursuant to the provisions of the Local Government Official Information and Meetings Act 1987, exclude the public from the following part of the proceedings of this meeting namely:

General subject of the matter to be considered	Reasons for passing this resolution in relation to each matter	Ground(s) under section 48(1) for the passing of this resolution
3.1 Appointment of external member to Finance Audit and Risk Sub Committee	7(2)(a) The withholding of the information is necessary to protect the privacy of natural persons, including that of a deceased person.	s48(1)(a) That the public conduct of this item would be likely to result in the disclosure of information for which good reason for withholding would exist under Section 7.
