

# Analysis of submissions

## Review of Alcohol Control Areas

### 1 Background

#### Council Approval of Public Consultation on the Review of Alcohol Control Areas

On 15 September 2025, following a review of the Alcohol Control Areas in the District, the Council approved the following (Resolution 2025/116 refers):

“That the Council, under section 147B of the Local Government Act 2002, approves consulting on:

- a) declaring three new permanent Alcohol Control Areas that will apply 24 hours a day, 7 days a week, all year round:
  - i) Waitangi
  - ii) Ōpua
  - iii) Lake Ngātu.
- b) amending five current permanent Alcohol Control Areas that will continue to apply 24 hours a day, 7 days a week, all year round:
  - i) Kaitāia
  - ii) Kerikeri
  - iii) Waipapa
  - iv) Paihia
  - v) Kaikohe.
- c) adopts the *Proposal to Amend Alcohol Ban Areas* to be released for public consultation to meet the requirements of section 82 of the Local Government Act 2002.
- d) approves the period for making written submissions on the Proposal will be a minimum of 4 weeks and will take place after the local body elections.”

#### Consultation Details

Accordingly, in the period from 3 November to 1 December 2025 (4 weeks), the public was invited to provide their views on the Proposal to Amend Alcohol Ban Areas (the Proposal).

They were informed of the consultation via:

- emails to:
  - Council’s database of people interested in being informed of consultation topics (this includes business associations and other community groups)
  - iwi contacts
  - businesses who will potentially be affected by new and revised Alcohol Control Areas
- the ‘Have Your Say’ page on the Council website
- a media release
- social media postings.

The following report analyses the submissions received and makes recommendations regarding the Alcohol Control Areas to be ratified by resolution of Council.

### 2 Summary of submissions

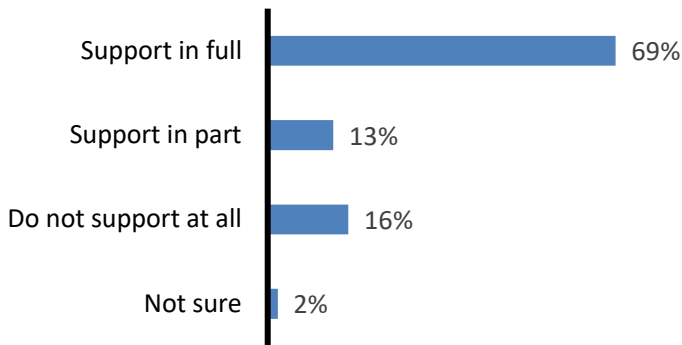
One hundred and fifty written submissions were received (148 online and 2 via email), while no one chose to verbally submit to the Council. Of the 150 written submissions, 136 were from individual submitters and 14 were from organisations.

This report analyses these submissions and recommends one modification to the original Proposal, namely not declaring Ōpua as an Alcohol Control Area.

A numbered list of people who made submissions is in Appendix One and these numbers are used to refer to the individual submissions in the body of this report.

Overall, there was strong support for the Proposal. The following chart summarises this support:

Figure 1: Support for declaring three new Alcohol Control Areas and revising five Existing Areas



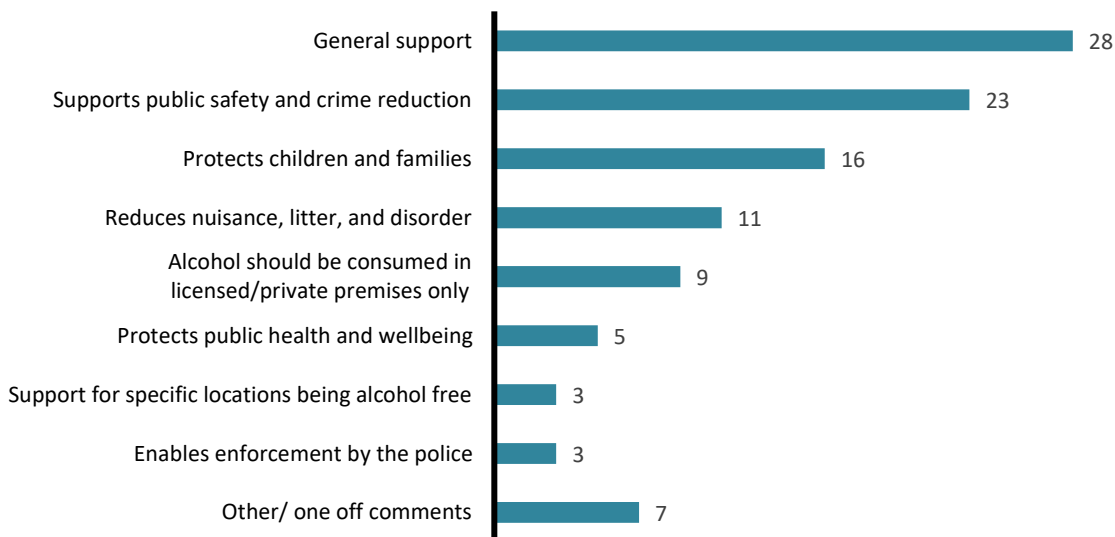
Base: 150 written submissions.

103 submissions (69%) fully supported the Proposal, 20 submissions (13%) supported this in part, while 24 submissions (16%) did not support the Proposal at all.

### 3 Why submitters supported the Proposal

Main reasons for supporting the Proposal (from those who expressed full and part support) are illustrated below:

Figure 2: Main reasons for supporting declaring three new Alcohol Control Areas and revising five Existing Areas (number of responses)



Base: 91 people who gave reasons why they supported the Proposal.

Note: Some people gave multiple reasons.

These responses are discussed below...

#### General support

Twenty-six people expressed general support for the Proposal, along the lines, “We don’t need alcohol in public areas” (submitter 5) and “Public drunkenness has no positives” (84).

### **Supports public safety and crime reduction**

Twenty-three people said the proposed changes to the Alcohol Control Areas support public safety and crime reduction. As submitter 93 stated, *Any reduction in alcohol drinking in public is better, safer, and reduces crime in our community.*

### **Protects children and families**

Sixteen submitters said that the amendments to the alcohol ban areas will protect children and families from exposure to alcohol-related misbehaviour in public. Submitters noted that alcohol-free spaces are safer for families and children who should not be exposed to adults drinking out of control.

### **Reduces nuisance, litter, and disorder**

Concerns about nuisance, litter, and general disorder were expressed by eleven submitters who noted negative impacts on public spaces. Typical comments included:

*Use of alcohol ... creates a nuisance, and litter problem (45)*

*Public drinking is dangerous because it can promote crime, violence and disorder (100).*

### **Alcohol should be consumed in licensed/private premises only**

Nine people said that alcohol should only be consumed in licensed premises or private property, not in public places.

### **Protects public health and wellbeing**

Five people, including those from Hauora organisations, mentioned public health benefits of having alcohol bans:

*Considering the harm alcohol has caused in our communities, historically and continuing today, strict restrictions are essential to help prevent littering, loitering, drunk driving, domestic violence, and general public disturbances (96).*

### **Support for specific locations being alcohol free**

Three submitters expressed support for specific locations being alcohol free. Their comments are discussed in section 5 of this report.

### **Enables enforcement by the police**

Three people noted that the proposed changes to the Alcohol Control Areas support the Police to enforce action against alcohol-related crime and disorder in these Areas.

### **Other/ one-off comments**

Individual submitters noted:

- Alcohol consumption is associated with domestic violence (25)
- Too many drunks are seen in public (47)
- Alcohol-related disorderly behaviour has been on the rise over the last few years (55)
- Alcohol is harmful and should be classified as a class 1 drug (111)
- Declaring areas as alcohol-free raises public awareness of drinking responsibly (59).

### **Staff analysis**

Reasons given for supporting the Proposal reflect the intended purpose of Alcohol Control Areas to help reduce alcohol-related harm in public places including protecting public safety, reducing crime, protecting children and families, and reducing public nuisance, litter and disorder.

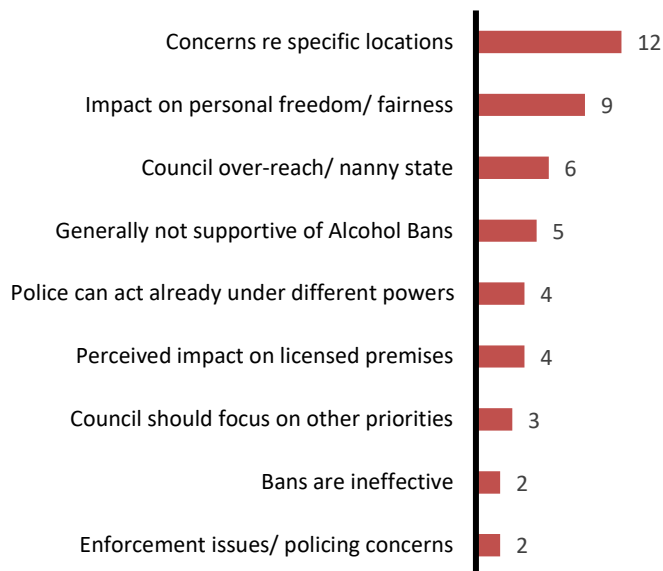
### **Staff recommendation**

No changes are recommended to the Proposal based on these positive submissions.

## 4 Why submitters were not fully supportive of the Proposal

Main reasons for not fully supporting the Proposal (from those who expressed part support and those who did not support the Proposal at all) are illustrated below:

Figure three: Main reasons for not fully supporting declaring three new Alcohol Control Areas and revising five existing areas (number of responses)



Base: 35 people who did not fully support revising the ban areas or only supported this in part.

Note: Some people gave multiple reasons.

These reasons are discussed below.

### Concerns re specific locations

Twelve submitters expressed concerns about specific locations proposed to be alcohol-free areas. Their feedback is discussed in section 5 of this report.

### Impact on personal freedom/ fairness

Nine people were concerned that alcohol-free areas will impact on their personal freedom of choice or will unfairly discriminate against responsible drinkers. Typical quotes included:

*Individuals should be able to do as they please in public spaces (89)*

*Why should people be told that they can't have a quiet drink with their picnic on the beach? (101)*

*I don't believe in taking away the rights of many because of a few people that can't control themselves (6).*

### Staff analysis

Individual rights are vital, yet they must be balanced against community wellbeing, especially in shared public spaces where the actions of a few can cause significant harm to many.

Alcohol-related disorder and crime have repeatedly disrupted community safety and enjoyment in many localities in the district. When irresponsible drinking leads to violence, intimidation, and property damage, the Council has a duty to act.

Restricting the possession and consumption of alcohol in these high-risk locations is a proportionate and preventative measure. As required by section 147(1)(b)(i) of the Local Government Act 2002 (LGA02), Alcohol Control Areas can only be declared in places with a proven history of harm, to help ensure that families and residents can enjoy these areas without fear. This is not about punishing responsible drinkers; it is about protecting the wider community from the consequences of dangerous behaviour.

### Staff recommendation

Council staff recommend no changes to the Proposal based on these submissions.

### Council over-reach/ nanny state

Six submitters criticised the council for being too controlling or overstepping its role. Examples of their comments included:

*We did not vote for a NANNY council. Get out of our lives. People should be able to have some drinks outdoors in Northland wherever they are without your nanny state interventions (92)*

*Over regulation to the extreme (101).*

### Staff analysis

Council staff advise that the Proposal does not exceed the council's authority. Under section 147(2) of the Local Government Act 2002, the council is empowered to make bylaws regulating the consumption, possession, or bringing of alcohol into public places (excluding licensed premises) where high levels of alcohol-related disorder and crime have occurred.

Alcohol Control Areas are declared where there is evidence of harm to the public including violence, disorder, and crime in specific areas. This is a proportionate, targeted response, not a blanket restriction on personal freedoms.

The term "nanny state" is often used to criticise government or council actions that are perceived as overly controlling, suggesting that authorities are treating adults like children who need supervision. It implies unnecessary interference in personal choices. The Council is not acting as a "nanny" but fulfilling its legal responsibility to ensure public spaces are safe and enjoyable for all.

Individual rights matter, but they must be balanced against the community's right to safety.

### Staff recommendation

Given legislation empowers the council to declare alcohol bans in areas where a high level of alcohol-related crime and disorder exists and that these bans are a tool to address the extensive and serious problems of disorder and crime associated with public drinking in the Far North, no changes to the Proposal are recommended based on the above submissions.

### Generally not supportive of Alcohol Bans

Five submitters expressed a broad lack of support for alcohol bans, often without giving detailed reasons. Their comments reflected scepticism or opposition to the concept of bans in general. One submitter (44) said there is no evidence of harm.

### Staff analysis

Staff advise that there is strong evidence of drinking in public being a problem in the Far North.

A public survey conducted in May/June 2025 found that:

- 63% of respondents had observed people drinking in public in the district
- Of these, 60% reported witnessing disorderly or criminal behaviour, including littering, rowdy behaviour, excessive noise, violence, vomiting or urinating in public, and property damage.

Police records reinforce these findings. In 2024, 483 alcohol-related incidents in public places (excluding traffic offences) were reported to the Police in the Far North. Within the proposed three new Alcohol Control Areas and five revised areas, 284 incidents were reported to the Police in 2024 with 81 of these classified as very serious (e.g. acts intended to cause injury, weapons offences, theft, and sexual assault).

### Staff recommendation

Council staff recommend no changes to the Proposal based on these submissions.

### Police can act already under different powers

Four submitters said that existing laws such as the Summary Offences Act and the Crimes Act give the police sufficient powers to address alcohol-related issues, making new or revised alcohol bans unnecessary.

### Staff analysis

It is true that the Police can rely on several key Acts to address drunk and disorderly behaviour in public including the Summary Offences Act 1981 and the Crimes Act 1961. In general, minor nuisances fall under the Summary Offences Act, while serious crimes escalate to the Crimes Act.

While these Acts give police strong powers to address serious incidents involving drinking in public, they provide limited powers for the Police to proactively prevent alcohol-related problems in public places before they escalate. Also, arresting and processing offenders under these Acts involves considerable time and resources for the Police and court system.

By contrast, Alcohol Control Areas made under the Alcohol Control Bylaw 2018 (authorised by section 147 of LGA02) have a range of benefits for the Police including:

- The ability to proactively address issues before they escalate
- The option to issue infringement notices with a fine of \$150 'on the spot'
- Considerably less time and resources required to 'process' offenders.

### Staff recommendation

Compared with the powers provided by the Crimes Act and Summary Offences Act, designated Alcohol Control Areas give Police practical, immediate powers to proactively prevent alcohol-related harm in public without resorting to full criminal proceedings, thus saving time, reducing costs, and improving community safety. Staff therefore recommend no changes to the Proposal based on these submissions.

### Perceived impact on licensed premises

Four submitters expressed concern that the Alcohol Control Areas would negatively impact on licensed premises:

*The alcohol bans should not negatively impact outside seating areas provided by bars and cafes offering these, as this would negatively impact the business, and the customers' choice to be seated outside (53).*

### Staff analysis

Council staff advise that, as required by section 147(1)(b) of LGA02, licensed premises including licensed al fresco dining areas are excluded from the proposed alcohol ban areas.

### Staff recommendation

Staff recommend no changes to the Proposal based on these submissions.

### Council should focus on other priorities

Three people submitted that the council should focus on core services such as roads, water services, rubbish collection etc., rather than spending time and money on alcohol bans and restrictions:

### Staff analysis

Staff advise that core services such as roading, water supply, and waste management, are a priority for the council, reflected in council's annual expenditure. Nevertheless, the council has a statutory responsibility under the LGA02 and the Health Act 1956 to promote and protect public health and safety.

The cost to review the Alcohol Control Areas is relatively small, as enforcement is carried out by the Police. These costs come from existing budgets and include:

- researching and reporting on the need for amendments to the Control Areas established in 2018
- consultation and engagement with the public
- printing and placing new signage (est. \$5,000).

### Staff recommendation

Staff recommend no changes to the Proposal based on these submissions.

### Bans are ineffective

Two submitters argued that alcohol bans are ineffective - *Banning alcohol in places hasn't done anything to reduce crime or alcohol-related issues (50).*

### Staff analysis

Alcohol bans have been in place in the Far North since 2003 with the current Control Areas made by resolution of Council in 2018. Evidence was provided by the Police in 2018 for 16 of the 23 Alcohol Control Areas, that after alcohol controls were put in place the level of alcohol-related crime and disorder dropped. Examples of Police comments included the following:

Alcohol Control Area	Police comments re effectiveness of bans
<b>Kawakawa</b>	The alcohol ban has gone some way to prevent the migration of people with alcohol between licensed premises. The level of offending is not as severe, and serious injury assaults are now rare.
<b>Kerikeri</b>	The alcohol ban has improved both the visible wellbeing of the area and increased safety for all who use the area. The risk of violence and the need for a sustained police presence has reduced. People are less intimidated, especially at night. Serious injury assaults are now rare.
<b>Omapere</b>	There is not the same mass blatant drinking in carparks and public areas.
<b>Paihia</b>	The attraction to 'hang around' in town and look for trouble has reduced. The liquor ban has helped control the migration of people with alcohol between licenced premises. The level of offending is not so severe and serious assaults are less frequent.
<b>Russell</b>	Reports of fights, assaults and property damage are the exception. There is a general improved perception of public safety.
<b>Waipapa</b>	A reduction in alcohol related offending. Rarely do police encounter people breaching the Bylaw.

### Staff recommendation

Evidence from the Police is that alcohol bans do have a positive effect. Therefore, staff recommend no changes to the Proposal based on these submissions.

### Enforcement issues/ policing concerns

Two submitters raised concerns about the enforcement of the alcohol bans:

*Actually enforcing current laws to address anti-social behaviour is key (127)*

*I think that police should do their job (6).*

### Staff analysis

Feedback from the Police is that their resources are stretched and in their day-to-day experience, other matters may take priority over people consuming or bringing alcohol into public places. However, if this drinking escalates into crime and public disorder they will act if possible.

Council could potentially lobby for more Police "on the beat" in Far North communities where alcohol-related crime and disorder is occurring to address the resourcing issue Police have in tackling this area. However, this is outside the scope of reviewing the Alcohol Control Areas.

### Staff recommendation

Council staff recommend no changes to the Proposal in response to these submissions, as enforcement of the Bylaw is a matter of discretion for the Police.

### Ban all drugs

One submitter (61) suggested that a ban on all drugs would be better than banning alcohol.

### Staff analysis

Aside from alcohol bans and declaring council owned and administered public places as smokefree and vapefree, the council does not have the authority to ban other drugs in public (this is a matter for central government to address). NB. A Smokefree/Vapefree Policy is in development.

### Staff recommendation

Council staff recommend no changes to the Proposal in response to this submission.

## 5 Feedback re specific locations

### Submissions against the proposed Ōpua Alcohol Control Area

Eight submitters (10, 58, 76, 134, 136, 147, 149, and 150) were strongly opposed to an Alcohol Control Area being declared in Ōpua. They expressed that:

- Ōpua does not need an alcohol ban
- There is no evidence of public disorder in the area due to drinking in public - *I have NEVER seen any evidence that this area is affected by antisocial drinking* (150).
- The main type of crime in the area is car and boat theft – this suggests premeditated crime rather than disorder arising from public drinking.
- The Ōpua Marina should not be made an alcohol ban area as this is private property with gated access controls.

### Staff analysis

The proposal to declare Ōpua an alcohol ban area was based on the level of alcohol-related incidents in public places reported to the Police across the whole of the Waitangi/Paihia/Ōpua area.

However, feedback from Ōpua community members and from public health officials now indicates that the level of public drinking incidents in Ōpua is relatively minor and incidents in this broad area are concentrated in Paihia and Waitangi.

Council staff agree that the Marina should not be made an alcohol ban area as it is not open to or used by the general public. For this reason, the Marina was not included in the proposed Ōpua Alcohol Control Area.

### Staff recommendation

Staff recommend that Ōpua is not declared an Alcohol Control Area.

### Submissions in support of proposed alcohol ban areas in Waitangi and Paihia

Three submitters supported the proposed alcohol bans in Waitangi and Paihia:

*Particularly the Waitangi area where yacht club personnel operating the slipway are often drinking where there is dangerous equipment in use and children watching* (69)

*Paihia is a holiday town and very family orientated particularly over summer. Not allowing groups that can appear intimidating drinking in public is highly desirable to maintain the safe family feel of the township* (97).

### Staff recommendation

Council staff recommend no changes to the Proposal in response to these submissions.

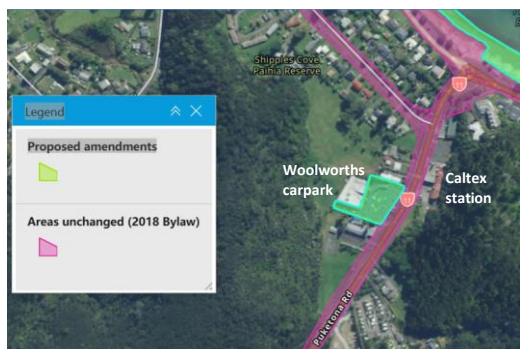
### Submission regarding the Paihia Alcohol Control Area

One person (51) suggested a change to the Paihia Alcohol Control Area by extending the alcohol ban area from the Caltex service station and Woolworths supermarket down to the beach, on Puketona Road.

### Staff analysis

Puketona Road from Woolworths and the Caltex service station to the beach is already included in the Alcohol Control Area, as shown in the map below:

Figure 3: Current and proposed alcohol ban locations on Puketona Road



#### Staff recommendation

Council staff recommend no change to the Proposal in response to this submission.

#### Submission regarding the Kerikeri Alcohol Control Area

Another submitter (65) suggested that the Fairy Pools area and the reserve area at Waipapa Landing should also be declared as alcohol-free.

#### Staff analysis

##### Re Fairy Pools

Fairy Pools Lane and Fairy Pools are already included in the proposed amendments to the Kerikeri Alcohol Control Area based on feedback from the public.

##### Re Waipapa Landing

Waipapa Landing is frequently used for swimming (as well as bathing and laundry during droughts). It is very open and looked over by local houses with the boat ramp parking being more secluded but also in clear view of the houses around the Inlet which tends to discourage public drinking. Public Health officials have occasionally observed alcohol-related litter in this area but consider this does not meet the threshold of 'a high level of alcohol-related disorder and crime' to justify declaring Waipapa Landing as an alcohol ban area.

#### Staff recommendation

Council staff recommend no change to the Proposal in response to this submission.

#### Submissions against the proposed new Lake Ngātu Alcohol Control Area

Two submitters opposed declaring an alcohol ban at Lake Ngātu because it would unfairly penalise 'responsible drinkers':

*Lake Ngātu is a great picnic spot and with a complete alcohol ban you remove the choice of a responsible drinker to enjoy a wine or beer with food (16)*

*Lake Ngātu is a place families can relax and responsibly have a couple of drinks. Is there a way of policing anti-social behaviour without a full ban? (99)*

#### Staff analysis

Unfortunately, as described in the *Research Report – Review of Alcohol Control Areas*, Lake Ngātu is a place where irresponsible public drinking has led to:

- Frequent broken glass from alcohol bottles causing cuts and injuries to children and adults using the Lake for activities like waka ama and swimming
- Alcohol litter, including bottles, cans, and drug paraphernalia, accumulating around the Lake and its access points, requiring regular clean-up by community members
- Exposure of children to drunken or abusive adults, with incidents of verbal abuse and intimidating behaviour reported
- Occasional fires, vandalism, and dangerous behaviour such as driving vehicles into the lake by intoxicated individuals



- Growing frustration among local users and clubs due to lack of effective action from authorities, leaving the community to manage safety risks alone.

Declaring Lake Ngātu as an alcohol ban area provides the Police with a regulatory tool to address this behaviour on-the-spot and enables Lake users to report irresponsible drinkers breaching the alcohol ban to the Police.

LGA02 does not allow the Council to impose a partial ban that only applies to irresponsible drinkers, but, given that the Police have discretion to enforce the alcohol ban (or not), they are likely to ignore ‘responsible drinkers’ enjoying a wine or beer with food.

#### Staff recommendation

Council staff recommend no change to the Proposal in response to these submissions.

### Submission that the Kororāreka (Russell) Alcohol Control Area should be reviewed

One submitter wanted the review of Alcohol Control Areas to apply to Kororāreka:

*I'd like to know why there is no review for Kororāreka? There is a massive clash of al fresco dining and the alcohol ban area. Makes it very confusing and also is undermining the whole kaupapa (33)*

#### Staff analysis

All current Alcohol Control Areas including Kororāreka (Russell) were considered in the review. Staff recommended no changes to the Kororāreka ban area as the alcohol ban already applies to most streets in the town.

Compared with other towns in the district, the level of disorderly and criminal behaviour associated with drinking in public in Kororāreka is very low. This assessment was based on:

- Police records** - only 10 alcohol-related incidents in public places were reported to the Police from 2021 to 2024 with just one incident reported in 2024. Comparative results for the Waitangi/Paihia/Ōpua area were 373 incidents from 2021 to 2024 and 47 incidents in 2024
- Observations by public health officials** – “from a good order perspective there was little to be found in Russell in terms of alcohol related litter, graffiti, or vandalism”.

Under the Road Use Bylaw 2022, four on-licence premises on the Strand have been approved by the Council to provide al fresco dining in designated spaces near the beach, with conditions applying to these approvals such as tables and chairs must be removed by 10pm each day. The licences for these premises allow alcohol to be served in the al fresco dining areas. Alcohol is only permitted in these spaces until 10pm each day to align with their alfresco dining approval conditions. The following picture shows the al fresco dining area permitted for one of these premises, Butterfish:



Under the LGA02, alcohol bans apply in areas open to or used by the public, but not to licensed premises including al fresco dining areas permitted for these premises. Therefore, the alcohol ban on the Strand does not apply to the four al fresco dining spaces. Staff acknowledge that this situation can be confusing e.g. in the Butterfish area those sitting on the public bench are not allowed to consume alcohol, whereas those in the al fresco dining area less than a meter away can consume alcohol. However, staff disagree that this is a “massive clash” as the level of disorderly drinking in Kororāreka is very low.

#### Staff recommendation

Council staff recommend no change to the Proposal in response to this submission.

## APPENDIX 1 – LIST OF SUBMISSIONS RECEIVED

Number	Organisation
1	Individual submission
2	Individual submission
3	Individual submission
4	Individual submission
5	Individual submission
6	Individual submission
7	Individual submission
8	Individual submission
9	Asian Development Bank
10	Individual submission
11	Individual submission
12	Individual submission
13	Individual submission
14	Northland Experiences
15	Individual submission
16	Individual submission
17	Individual submission
18	Individual submission
19	Individual submission
20	Individual submission
21	Doubtless Bay Business Association
22	Individual submission
23	Individual submission
24	Individual submission
25	Individual submission
26	Individual submission
27	Individual submission
28	Individual submission
29	Laser Plumbing Kerikeri
30	Individual submission
31	Individual submission
32	Individual submission
33	Individual submission
34	Individual submission
35	Individual submission
36	Individual submission
37	Individual submission
38	Individual submission
39	Individual submission
40	Individual submission
41	Individual submission
42	Individual submission
43	Individual submission
44	Individual submission
45	Individual submission
46	Individual submission
47	Individual submission
48	Individual submission
49	Individual submission
50	Individual submission
51	Individual submission
52	Individual submission
53	Individual submission

Number	Organisation
54	Individual submission
55	Individual submission
56	Individual submission
57	Individual submission
58	Individual submission
59	Individual submission
60	Individual submission
61	Individual submission
62	Individual submission
63	Taronui Bay
64	Individual submission
65	Individual submission
66	Individual submission
67	Individual submission
68	Individual submission
69	Individual submission
70	Individual submission
71	Individual submission
72	Individual submission
73	Individual submission
74	Te Wānanga o Te Rangi Aniwaniwa
75	Individual submission
76	Individual submission
77	Individual submission
78	Individual submission
79	Individual submission
80	Individual submission
81	Russell Protection Society
82	Individual submission
83	Individual submission
84	Individual submission
85	Individual submission
86	Individual submission
87	Individual submission
88	Individual submission
89	Individual submission
90	Individual submission
91	Individual submission
92	Individual submission
93	Individual submission
94	Individual submission
95	Individual submission
96	Individual submission
97	Individual submission
98	Individual submission
99	Individual submission
100	Individual submission
101	Individual submission
102	Individual submission
103	Feros Ferio Winery
104	Individual submission
105	Individual submission
106	Individual submission
107	Individual submission
108	Individual submission

Number	Organisation
109	Sustainable Solutions Inc.
110	Individual submission
111	Individual submission
112	Individual submission
113	Individual submission
114	Individual submission
115	Te Rarawa Anga Mua
116	Individual submission
117	Individual submission
118	Individual submission
119	Individual submission
120	Individual submission
121	Individual submission
122	NgaPuhi (no further detail)
123	Individual submission
124	Individual submission
125	Individual submission
126	Individual submission
127	Individual submission
128	Individual submission
129	Individual submission
130	Individual submission
131	Individual submission
132	Individual submission
133	Individual submission
134	Individual submission
135	Individual submission
136	Individual submission
137	Individual submission
138	Individual submission
139	Individual submission
140	Individual submission
141	Te Pokapu Clinic
142	Individual submission
143	Te Rūnanga o Whaingaroa
144	Ngātihine Health Trust
145	Individual submission
146	Individual submission
147	Individual submission
148	Individual submission
149	Individual submission
150	Individual submission