Committee Members

Chair: Brett Cummings Cr Allan Birchfield Cr Andy Campbell Cr Chris Coll Cr Peter Ewen Cr Peter Haddock Cr Mark McIntyre

Iwi Representatives

Francois Tumahai (Te Rūnanga o Ngāti Waewae) Jackie Douglas (Te Rūnanga o Makaawhio)



PUBLIC COPY

Meeting of Resource Management Committee (*Te Huinga Tu*)

Tuesday 1 April 2025

9.30am

West Coast Regional Council Chambers 388 Main South Road Greymouth

and

Live streamed via West Coast Regional Council's YouTube Channel:

@westcoastregionalcouncil5171

Resource Management Committee Meeting (Te Huinga Tu)

AGENDA

(Rarangi Take)

1.	Welcome (Haere mai)	Pg No
2.	Apologies <i>(Ngā Pa Pouri)</i>	
3.	Declarations of Interest	
4.	Public Forum, Petitions and Deputations (He Huinga tuku korero)	
5.	Confirmation of Minutes (Whakau korero) 5.1 Resource Management Committee Meeting Minutes – 4 March 2025 Matters Arising	1 2
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10. Public Excluded Business

11. Confirmation of Public Excluded Minutes

11.1 Resource Management Committee Public Excluded Meeting Minutes – 4 March 2025Matters arising

12. Actions List

D. Lew Chief Executive 23

Purpose of Local Government

The reports contained in this agenda address the requirements of the Local Government Act 2002 in relation to decision making. Unless otherwise stated, the recommended option promotes the social, economic, environmental, and cultural well-being of communities in the present and for the future.

Health and Safety Emergency Procedure

In the event of an emergency, please exit through the emergency door in the Council Chambers.

If you require assistance to exit, please see a staff member. Once you reach the bottom of the stairs make your way to the assembly point at the grassed area at the front of the building. Staff will guide you to an alternative route if necessary.

5 Minutes of Resource Management Meeting

4 March 2025

Author Dearne Thompson, Principal Governance Advisor

Authoriser

Public Excluded No

Report Purpose

The purpose of this report is to receive the minutes of the Resource Management Committee meeting of 4 March 2025.

Recommendations

It is recommended that Committee resolves to:

1. Confirm that the minutes of the Resource Management Committee meeting held on 4 March 2025 are a true and correct record.

Attachments

Attachment 1: Minutes of the Resource Management Committee meeting held

on 4 March 2025.

WEST COAST REGIONAL COUNCIL

MINUTES OF THE RESOURCE MANAGEMENT COMMITTEE MEETING HELD ON 4 MARCH 2025 AT TE TAURAKA WAKA A MĀUI MARAE, 4851 HAAST HIGHWAY, SH6, BRUCE BAY, WEST COAST, COMMENCING AT 10.18AM

PRESENT: B. Cummings (Chair), A. Birchfield, A. Campbell, C. Coll, P. Ewen,

P. Haddock, M. McIntyre, J. Douglas (Te Rūnanga o Makaawhio).

IN ATTENDANCE: D. Lew (Chief Executive), J. Field (Group Manager – Office of the

CE), P. Miller (Corporate Services Manager), J. Allen (Group Manager – Regulatory and Policy), S. Morgan (Group Manager – Environmental Sciences), T. Hopkins (Capital Programme Manager), A. Stuart (Poutini Ngāi Tahu Partnership & Economic Development Manager), N. Wilson-Loach (Hydrology Technician), D. Thompson (Governance Support Officer), R. Barrow (Executive Assistant), T. Wyndham-Smith (Principal Communications and Engagement Advisor), P. Madgwick (Te Rūnanga o Makaawhio),

C. Maitland.

1. Welcome

The Chair welcomed those attending.

2. Apologies

Moved (Ewen / Birchfield) apology from F. Tumahai (Te Rūnanga o Ngāti Waewae) is accepted.

Carried

3. Declarations of Interest

No declarations of interest.

4. Public Forum, Petitions and Deputations

No public forums or deputations.

5. Confirmation of Minutes

5.1 Minutes of Council Meeting 4 February 2025

The Chair invited corrections to the minutes of the meeting held on 4 February 2025. No corrections were noted.

Moved (Haddock / McIntyre) the minutes of the meeting are confirmed as a true and correct record.

Carried

Matters Arising

No matters arising.

6. Actions List

The actions list was reviewed, and the following updates were noted.

- Item 1 Ongoing.
- Item 2 Ongoing; geotechnical advice has been received, now need to incorporate this into the bylaw.

Moved (Birchfield / Ewen) that the Council receives the Actions List and noted information.

Carried

7. Chairs Report (verbal update)

No Chair's update made.

8. Reports

8.1 Environment Science Quarterly Report

- S. Morgan presented the quarterly report covering operational activities undertaken by the hydrology and environmental quality teams between 20 November and 20 February.
- S. Morgan noted that contact recreation monitoring continued over summer to measure E. coli levels at key swimming spots, including a new monitoring site at Reefton in response to community requests (location map to be provided to Councillors for their information; S. Morgan confirmed it was in the township area). Initial results showed very low risk category readings.

S. Morgan also highlighted the importance of this work to Tangata Whenua, noting that the Council works under the Mana Whakahono ā Rohe agreement and the Poutini Ngāi Tahu partnership protocol.

In response to questions raised about groundwater levels in the Grey Valley and irrigation consents, D. Lew noted that while the West Coast experiences drought conditions at times, it does not face the same water allocation pressures as regions like Canterbury and therefore has not required the same level of investment in groundwater monitoring and modelling. Irrigation consents are reviewed regularly.

Councillors commended staff on a comprehensive report.

Moved (Haddock / Coll) the Council receive the report.

Carried

8.2 Annual Lake Brunner Water Quality Technical Report

S. Morgan presented the Annual Lake Brunner Water Quality Technical Report, noting that while this was previously a KPI in the old Long Term Plan, it remains important work for the community and Mana Whenua. The report provides valuable long-term data on Lake Brunner's water quality.

Discussion followed regarding:

- Subdivisions and their sewage discharge systems. It was noted that new subdivisions typically have adequate systems, with older septic tanks from the 1970s being more problematic.
- The requirement for expanded monitoring at Lake Kaniere due to increased development pressure and its importance as a water supply and recreational area.
 While it is noted that District Councils are responsible for monitoring drinking water quality, D. Lew suggested a paper is prepared to come to Council documenting the pressures on Lake Kaniere and potential responses.

Moved (McIntyre / Haddock) the Council receive the report.

Carried

Moved (Campbell / McIntyre) the Council endorse the continued monitoring of Lake Brunner due to its value for long-term environmental assessment and compliance with National Policy directives.

Carried

8.3 Planning and TTPP Report

J. Allen spoke to her report. A small change has been made to the current Freshwater and Land Regional Plan, specifically in the wetlands chapter, attributing policies to the National Policy Statement of Freshwater Management 2020. This change was exercised through section 55 of the Resource Management Act, which meant no consultation was required. The public will be notified of this change.

Cr Haddock noted that all-day TTPP committee meetings are scheduled from 10 April through to September, at which time all decisions are expected to be made following recommendations from the commissioners.

Moved (Coll / Ewen) the Council receive the report.

Carried

Moved (McIntyre / Campbell) the Council retrospectively approve the Te Ura Kahika submission on the Resource Management (Consenting and Other System Changes) Amendment Bill (RM Bill No 2).

Carried

8.4 Update on a Joint Review of Paetae Kotahitanga ki Te Tai Poutini – Partnership Protocol and Mana Whakahono ā Rohe – Resource Management Act Iwi Participation Agreement

- J. Allen presented a joint update on the review of the partnership protocol and Mana Whakahono ā Rohe, which is an iwi participation agreement under the Resource Management Act. She noted that this report was co-authored with P. Lynch, General Manager of Poutini Environmental.
- J. Allen explained that work had been ongoing since late 2023, with the review being a statutory obligation of the Mana Whakahono agreement originally signed in August

2020. She noted that this agreement was the first of its kind in the country and had received an award from the New Zealand Planning Institute.

Discussion followed, including both support for the agreement and some concern about cost to resource consent applicants and time taken. D. Lew clarified that the review had been delayed by mutual agreement with Poutini Ngāi Tahu to allow resources to focus on the Te Tai o Poutini Plan (TTPP). He noted that as the TTPP hearings were nearing completion, resources could now return to this work. He emphasised that successful implementation should result in more efficient and cost-effective processes for applicants.

It was agreed that future meetings will be asked to consider the matters of:

- How governance want to have oversight on the (re)implementation of Paetae Kotahitangi ki Te Tai Poutini and Mana Whakahono ā Rohe; and
- Providing direction and setting further expectations as needed on the review.

Moved (Ewen / McIntyre) the Council:

1. Receive the report.

Carried

8.5 Addressing Systemic Wastewater Non-Compliance: A Shared Commitment to Environmental Protection

J. Allen thanked C. Maitland for the great work completed to date and presented a report on the programme of work being undertaken by the regulatory team regarding wastewater treatment plants across the region.

Some wastewater treatment plants in NZ are operating under section 124 of the Resource Management Act, which allows activities to continue operating until a consent is granted and all decisions have been made. C. Maitland advised that approximately 20% of the country's wastewater treatment plants are in this situation of having expired consents, with two plants in the West Coast region currently in this situation.

D. Lew expanded on the report, explaining that staff were concerned about expired consents, some over 10 years old, and non-compliances with discharges. He highlighted the significant consent renewal programmes coming up, such as for the Hokitika Wastewater Plant in 2026.

D. Lew stated that district councils had been asked to submit action plans to WCRC, acknowledging they cannot fix all issues immediately but committing to a series of actions, tasks, timelines and resources to address these issues. All three district council chief executives had agreed to work with the Regional Council on these action plans. WCRC will submit on district council's LTP's in support of the prioritisation of wastewater treatment plant works.

D. Lew emphasised that while the Regional Council did not want to take enforcement action against other local government entities, they had a regulatory responsibility to uphold and could not treat district councils differently from other entities regarding illegal discharges.

J. Allen advised that Taumata Arowai, the water regulator, is bringing down national standards to govern wastewater discharges that will affect consent processes. Plants expiring soon, such as the Hokitika plant in 2026, will receive an automatic extension to 2028 to accommodate the new standards and work on designs and upgrades.

Moved (Birchfield / Haddock) the Council:

- 1. Receive the report.
- 2. Support the collaborative approach WCRC is taking with the District Councils.
- 3. Recognise the importance of working closely and in partnership with Poutini Ngāi Tahu.
- 4. Acknowledge WCRC's commitment to enforcement alongside collaboration to ensure improved environmental outcomes.

Carried

9. General Business

9.1 **Gravel extraction from Haast**

Cr Ewen said he has received an enquiry from a resident from Haast regarding DOC charging a royalty on gravel from the Haast River and he asked about ownership and if the adjacent landowner had rights. C. Barnes advised he would look into the facts and report back.

9.2 Welcome to new staff

Welcome to Ashley Stuart, new Poutini Ngāi Tahu Partnership & Economic Development Manager, and Dearne Thompson, new Governance Support. Rasela Barrow, Executive Assistant, was acknowledged and thanked for maintaining governance functions during the transition period.

9.3 Rating district meetings

Rating district meetings are almost completed. Cr Ewen asked for information on councillor attendance. D. Lew confirmed that an omnibus report containing minutes, recommendations and actions from all 23 rating districts and joint committees would be presented to a future Operations Committee meeting.

9.4 Catchment meeting, Waimea Creek

Cr Cummings inquired about a catchment meeting for the Waimea Creek. S. Morgan confirmed she was organising this through the Environmental Science Department, taking a non-regulatory approach to support miners in that community. She explained they were partnering with Minerals West Coast and would provide an overview of regulatory systems while facilitating open conversation with miners. Cr Cummings asked that Councillors also be invited.

Moved (Haddock / McIntyre) that:

 The public be excluded from the following parts of the proceedings of this meeting, namely – agenda items 10 and 11 (all inclusive);

Agenda Item No.	General Subject of each matter to be considered	,	section 7 of LGOIMA for the passing of this
10	Public-	The item contains	To protect
	Excluded	information	commercial and
	Minutes of	relating to	private information
	Council	commercial,	and to prevent
	Meeting 4	privacy and	disclosure of
	February 2025	security matters	information for
			improper gain or

			advantage (s7(2)(a), s7(2)(b), and s7(2)(j)).
11	Actions List	The item contains information relating to commercial, privacy and security matters	To protect commercial and private information and to prevent disclosure of information for improper gain or advantage (\$7(2)(a), \$7(2)(b), and \$7(2)(j)).

and that

- 2. Darryl Lew, Chris Barnes, Chris Maitland, Jo Field and Jocelyne Allen were permitted to remain at this meeting after the public have been excluded due to their knowledge of the subjects. This knowledge will be of assistance in relation to the matters to be discussed; and that
- 3. The Governance Support Officer and Executive Assistant were also be permitted to remain.

d

	Carrie
The meeting moved into a public excluded session at 11.53am.	
Chair	

6 Actions List

Author Dearne Thompson, Principal Governance Advisor

Authoriser

Public Excluded No

Report Purpose

This report is a summary of items that require actions.

The responsible managers have updated the list and will address their respective action items.

Recommendations

It is recommended that the Committee resolves to:

1. Receive the report.

ACTIONS LIST

Item No.	Reference	Date of Meeting	Item	Officer	Update
1.	ACT0008	10 Dec 2024	To investigate the delegation and/or deeds with WDC regarding the mining operations and noise issues/consents and update the Councillors.	GM Regulatory & Policy	Ongoing. A meeting will be held within the next few months with the WDC team.
2.	ACT0004	10 Dec 2024	To determine the timelines for the review and update of the Flood Protection Bylaw.	GM Regulatory & Policy	Ongoing. Geotechnical information has been received; currently awaiting Engineering comment.
3.	ACT0008	4 Mar 2025	To present a paper documenting the pressures on Lake Kaniere and potential responses.	GM Environmental Science	Ongoing. The Environmental Science team will undertake the analysis work for this report during quarter four, with an aim to present the results in the final quarterly update to RMC (July 2025).
4.	ACT0029	4 Mar 2025	To provide the Committee with a list of wastewater discharges and who owns them.	GM Regulatory & Policy	Complete.

Item No	Reference	Date of Meeting	Item	Officer	Update
5.	ACT0030	4 Mar 2025	To investigate enquiry raised by Cr Ewen regarding DOC charging royalties on gravel from Haast River.	GM Regulatory & Policy	Complete.

8. REPORTS

8.1 Planning and TTPP Report

Author Max Dickens, Policy Manager

Authoriser Jocelyne Allen, Group Manager Regulatory and Policy

Public Excluded No

Report Purpose

To update the Resource Management Committee on planning and TTPP developments.

Recommendations

It is recommended that the Committee resolve to:

1. Receive the report.

Issues and Discussion

Planning

Air Plan Review

Consultation with key stakeholders and drafting of the Issues and Options Reports are progressing well. Regarding outdoor burning, and fire training activities, we are actively collaborating with stakeholders, including Fire and Emergency New Zealand (FENZ) and the three District Councils, to ensure that all relevant perspectives are considered. In relation to agrichemicals and spray drift, our stakeholder engagements have helped identify potential options, which our staff are currently assessing for a possible updated permitted activity regime under the Air Plan.

Coastal Plan

Key stakeholder consultation and the drafting of the Issues and Options Report is ongoing. Plan drafting is expected to commence in approximately July. Poutini Ngāi Tahu have recently had input into the Public Access chapter of the Issues and Options Report. No changes are made to the Attachment 2 timeline.

Engagement with Waimea Catchment Miners

The Policy and Regulatory team, alongside the science team delivered an update on freshwater, indigenous biodiversity, and resource management at the Waimea Catchment Miners Best Practice Workshop in Kumara on 13 March 2025. The meeting was a success, facilitating a stronger mutual understanding and promoting collaboration.



Photo 1: Waimea Catchment Miner's Best Practice Workshop – Kumara – 13 March 2025

Transport

Total Mobility System Update

This project is tracking on schedule. Card testing is expected to commence in mid-April. Staff are working with taxi companies and service providers to coordinate the rollout of the digital system. There will be a six week grace period to switch from the paper chit system to the new cards. This will ensure that all clients have received their cards and the system is working correctly.

TTPP

The final TTPP Hearing on Variation 2 – Coastal Hazards was held 18-20 March.

Eighteen submitters were heard over two days in Westport and two submitters in Hokitika on 20 March. Responses to hearing panel questions on this topic are ongoing. The hearing panel are writing their draft reports on the 23 plan topics in TTPP. The reports are at different stages of development determined by when the hearing was held, and the delivery of any further information sought by the panel. It is anticipated that decisions will be made on the plan during September.

Considerations

Implications/Risks

There are no implications or risks arising from items in this report.

Significance and Engagement Policy Assessment

There are no issues within this report which trigger matters in the Significance policy.

Poutini Ngāi Tahu views

Staff are working with our Poutini Ngāi Tahu partners on the matters above as part of our Mana Whakahono a Rohe agreement. We continue to work closely with them throughout the policy development cycle.

Views of affected parties

No parties will be affected by the subject matter of this report.

Financial implications

There are no current financial implications arising from items in this report.

Legal implications

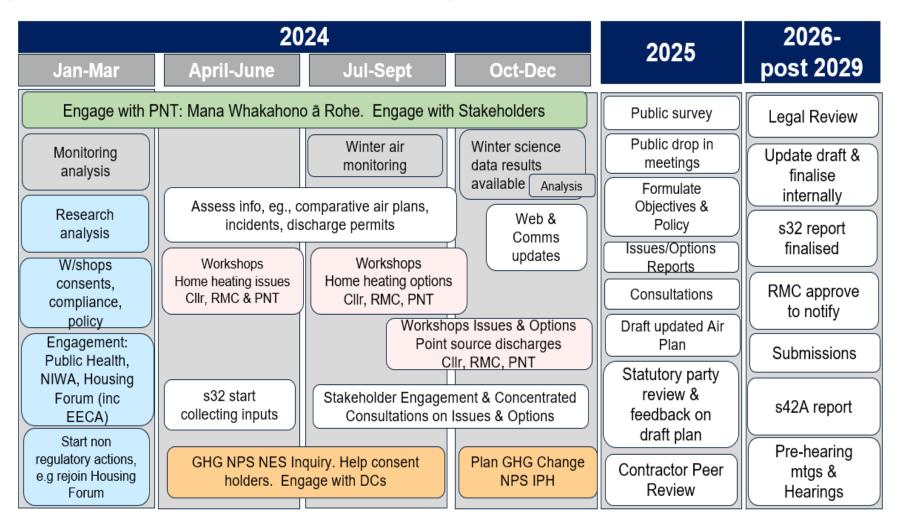
There are no legal implications arising from items in this report.

Attachments

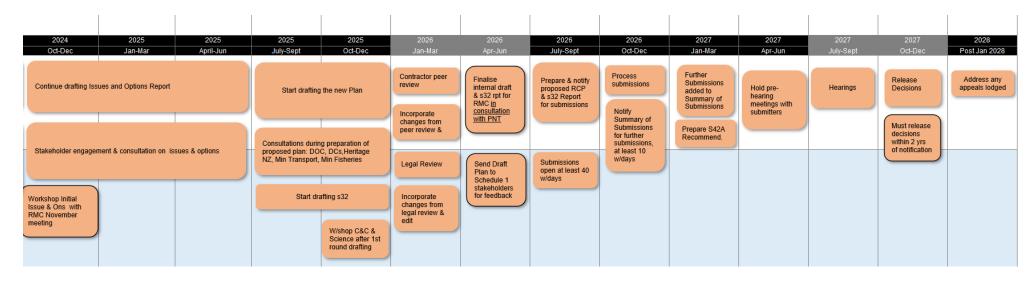
Attachment 1: Roadmap Air Quality Plan Review
Attachment 2: Roadmap of Coastal Plan Review

Attachment 1: Road map for Air Plan Review

(from Powerpoint presentation to Councillor workshop 8 October 2024)



Attachment 2: Coastal Plan Timeline



8.2 Estuarine Monitoring Investigations

Author Shanti Morgan, Group Manager Environmental

Science; Jonny Horrox, Manager Environmental

quality

Authoriser Darryl Lew, Chief Executive

Public Excluded No

Report Purpose

The purpose of this report is to inform the Resource Management Committee about the Environmental Science team's planned estuarine monitoring initiative. This work will support the review of the West Coast Regional Council's Regional Coastal Plan and serve as a pilot study to assess the feasibility of developing a State of the Environment (SOE) monitoring programme for estuarine health in the future.

Report Summary

WCRC is undertaking estuarine sampling at representative estuaries across the Region to collect baseline data on estuarine health. The surveys will measure biological, physical and chemical indicators, including macrofauna, macroalgae, sediment properties and contaminant levels. The data will inform the 2001 Regional Coastal Plan review and may contribute to long-term environmental monitoring efforts. Sampling will be conducted over the next few months as time and resources allow, with each site taking approximately one day to complete.

Recommendations

It is recommended that the Committee resolve to:

- 1. Receive the report.
- 2. Note the purpose and scope of the estuarine sampling project.
- 3. Support the integration of findings into the 2001 Regional Coastal Plan review.
- 4. Consider future funding and resource allocation for ongoing estuarine monitoring should the pilot study indicate the need for long-term data collection.

Issues and Discussion

Background

Estuarine environments are critical ecosystems providing habitat, nutrient cycling, and buffering against coastal erosion. However, they are vulnerable to pollution, sedimentation and habitat degradation. The West Coast Regional Council's (WCRC) Coastal Plan 2001 is overdue for review, and updated environmental data is required to ensure effective policy development. In the first-stage issues identification process for the Coastal Plan review, Poutini Ngāi Tahu raised concerns about potential impacts of sedimentation and contaminants in estuaries that are important sources of kaimoana (seafood) for them. Poutini Ngāi Tahu have a kaitiakitanga (stewardship) role with maintaining the health of estuaries which have spiritual and cultural significance to them. Additionally, there is interest in developing a State of the Environment monitoring programme to track changes in estuarine health over time.

This initiative aligns with several legislative and policy frameworks, including:

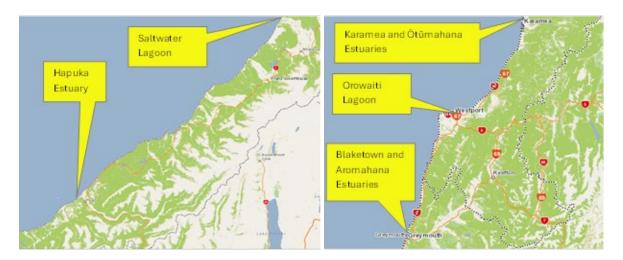
- The **Resource Management Act 1991 (RMA)**, which requires councils to manage coastal and freshwater ecosystems sustainably. Relevant sections include:
 - Section 30: Functions of regional councils, including monitoring of the state of the environment and maintaining and enhancing water quality.
 - Section 35: Duty to gather information, monitor, and keep records on environmental conditions.
- The New Zealand Coastal Policy Statement 2010 (NZCPS), which sets out national objectives for coastal management, including maintaining and enhancing estuarine health.
- The National Policy Statement for Freshwater Management 2020 (NPS-FM), which highlights the need to improve water quality in estuaries and other water bodies connected to freshwater systems.
- Mana Whakahono ā Rohe Participation Arrangement with Poutini Ngāi Tahu,
 which outlines the partnership between the WCRC and Poutini Ngāi Tahu for
 fulfilling RMA roles. The RMA and NZCPS also have provisions for recognising the
 kaitiaki role of Poutini Ngāi Tahu and involving them in the management of the
 coastal marine area.

Other regional councils, such as Bay of Plenty Regional Council and Waikato Regional Council, have estuarine monitoring programmes to inform their respective coastal and freshwater management policies. WCRC aims to use this study to gain baseline data. This would complement longer-term monitoring if Council chose to commit the additional resources required to commit to this.

Current situation

Sampling is proposed for the following estuaries:

- Karamea Estuary
- Ōtūmahana Estuary
- Cobden Aromahana Lagoon
- Blaketown Lagoon
- Orowaiti Estuary (upstream and downstream sites)
- Saltwater Lagoon (between the Poerua and Whataroa Rivers)
- Hapuka Estuary



Estuary selection is based on Manawhenua priorities, reference vs impacted status, geographic representation, size and ecological values.

Sampling will be carried out over the next few months as time permits, which will fit in with the timeframes for the Coastal Plan review. Each site is expected to take approximately one day to complete. The parameters measured will include macrofauna community composition, macroalgae cover, benthic microalgae, and physical and chemical sediment properties. Contaminants such as trace metals, petroleum hydrocarbons, PAHs, and total DDT will be analysed where relevant.

The WCRC has historically focused on surface and ground water quality monitoring around these estuarine ecosystems.

Water sampling provides useful information on nutrient levels, contaminants, and overall water chemistry, but it is highly variable. Measures derived from estuarine sediments are representative of longer 'legacy' conditions. This includes the physical and chemical qualities of those sediments, and the biology on and in them. By analysing sediment composition, contaminant accumulation, and species diversity, estuarine monitoring can help us to understand long-term environmental changes,

habitat degradation, and ecosystem stressors that may not be evident through standard water quality testing alone.

On completion of this study a report will be presented back to the RMC with recommendations on future effort in estuarine sampling work, noting this is a one-off piece of work.

Considerations

Implications/risks

- **Financial:** Sampling is resource intensive. To mitigate costs, WCRC will prioritise key sites and parameters and undertake an overall review of the science programme prior to implementing a fully-fledged estuarine monitoring programme.
- **Regulatory:** Findings could indicate the need for policy changes. Early engagement with stakeholders will facilitate smooth policy integration.
- **Environmental:** Potential contamination or degradation issues may arise. Timely identification and collaboration with relevant agencies and landowners will enable appropriate mitigation actions. The WCRC has externally funded resources through the catchment coordination grant to work with land users to address degradation issues should they arise.

Significance and Engagement Policy assessment

There are no issues within this report which trigger matters in this policy.

Tangata whenua views

• **Iwi/Hapū:** Local iwi and hapū have a strong interest in estuarine health and will need to be engaged regarding findings and implications.

Views of affected parties

- **Community Groups:** Local environmental and conservation groups may have insights or concerns regarding estuarine conditions. Staff will work with these groups through the catchment coordination programme.
- **Industry and Landowners:** Potential impacts on farming, mining, and other industries should be considered, particularly if contamination sources are identified. Council will continue to work with industry groups as trialled with miners in the Waimea catchment to address any concerns should they arise.
- Regulatory Agencies: Collaboration with other government and scientific agencies may be required to align monitoring efforts and address any emerging environmental issues.

Financial implications

This work can be completed within current budgets; future budget needs to continue estuarine monitoring will be assessed once results of the investigatory monitoring are established. This work is being supported by VCS staff internally.

Legal implications

There are no known legal implications associated with this work.

Attachments

None

10 Public Excluded Business

To: Chair, Resource Management Committee

I move that:

1. The public be excluded from the following parts of the proceedings of this meeting, namely – **agenda items 11 to 12** (all inclusive).

The general subject of each matter to be considered while the public is excluded, the reason for passing this resolution in relation to each matter and the specific grounds under section 48(1) of the Local Government Official Information and Meetings Act 1987 for the passing of this resolution are as follows:

Item No	General Subject of each matter to be considered	Reason for passing this resolution in relation to each matter	Ground(s) under section 7 of LGOIMA for the passing of this resolution
11.1	Minutes of Resource Management Committee public excluded meeting - 4 March 2025	The item contains information relating to commercial, privacy and security matters	To protect commercial and private information and to prevent disclosure of information for improper gain or advantage (\$7(2)(a), \$7(2)(b), and \$7(2)(j)).
12	Actions List – public excluded	The item contains information relating to commercial, privacy and security matters	To protect commercial and private information and to prevent disclosure of information for improper gain or advantage (s7(2)(a), s7(2)(b), and s7(2)(j)).