I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI
IN THE WAITANGI TRIBUNAL

Wai 1750
Wai 339
Wai 1865

In the Matter	of the Treaty of Waitangi Act 1975
And	
In the Matter	of the North-Eastern Bay of Plenty district Inquiry (Wai 1750)
And	
In the Matter	of a claim by Dean Flavell and Miranda Horan on behalf of the Hiwarau C Trust (Wai 339)
And	
In the Matter	of a claim by Miranda Horan and Roslyn Adair Pukepuke for, and on behalf of, the descendants of the original owners of Hiwarau B1B1 and Hiwarau B1B2 (Wai 1865)

JOINT OPENING SUBMISSIONS ON BEHALF OF WAI 339 AND WAI 1865

Dated 4 November 2025

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TĒNĀ E TE TARAIPIUNARA
MAY IT PLEASE THE TRIBUNAL

1. This Joint Opening Submission is filed on behalf of:

    a. **Wai 339**, a claim by Dean Flavell and Miranda Horan on behalf of the Hiwarau C Trust; and

    b. **Wai 1865**, a claim by Miranda Horan and Roslyn Adair Pukepuke for, and on behalf of, the descendants of the original owners of Hiwarau B1B1 and Hiwarau B1B2.

    (**Claimants**)

2. The Claimants are presenting their evidence in hearing six of Wai 1750 – the North-Eastern Bay of Plenty District Inquiry (**Inquiry**), at Kutarere Marae.

BACKGROUND TO WAI 339

3. Wai 339 was originally filed by Tuiringa (Manny) Mokomoko in the Waitangi Tribunal on 17 December 1992.[1] Dean Flavell and Miranda Horan, the current named Claimants of Wai 339, acknowledge Mr Mokomoko as the original applicant for the claim and note that Mr Mokomoko passed away before seeing these wrongs addressed. The Claimants believe that it was Mr Mokomoko's wish and the wish of the owners to have the titles of Hiwarau restored to the owners, therefore allowing their own tino rangatiratanga to be realised.

4. Wai 339 is a claim about the Crown's breaches of te Tiriti o Waitangi, by creating a statutory regime, the Māori Affairs Act 1953, that allowed for twenty individual land titles to be rescinded and amalgamated without the consent of the owners in 1969. At the time of the amalgamation, the Crown's legislation, the Māori Affairs Act 1953, then enabled the land to be vested in the administration of the Māori Trustee.

5. Despite repeated requests for assistance, thirty-three years have since passed, with the claim still before this Tribunal. The Crown and its agents

[1] Statement of Claim (Wai 339, #1.1.) 17 December 1992.

have not yet addressed the concerns that have been raised by the Claimants. It has been repeatedly acknowledged over the years by various judges in the Māori Land Court, the difficult situation the Trust is in, but nothing has been done to resolve the compounding issues.

6. Today, the Trustees of Hiwarau C are trying their best to maintain status quo but, as the evidence will show, are struggling. The Trust has no income – there are no leases on the block, and owners are not able to live on their former land titles.

BACKGROUND TO WAI 1865

7. Wai 1865 was filed in the Waitangi Tribunal on 5 August 2008, by Miranda Horan.[2] Ms Horan filed the claim at the same time that she made an application to have her whānau land blocks, formerly known as Hiwarau B1B1 and Hiwarau B1B2, partitioned out of the Hiwarau C Block under s 289 of Te Ture Whenua Māori Act 1993. Ms Horan filed Wai 1865 out of concern that the application process of the Māori Land Court and the statutory regime that it operates under will hinder the return of her whānau land blocks.

8. Sadly, due to the high costs, the convoluted processes, and the lack of assistance from the Crown and its agents (whether that be advice for navigating the application process or financial assistance), Ms Horan was not able to complete the process of having her whānau blocks partitioned out.

9. Despite the Crown establishing the statutory regime that provided the Māori Land Court with the 'special power' to cancel the Māori freehold titles of Hiwarau B1B1 and Hiwarau B1B2 and amalgamate them into one larger land block, it is Ms Horan and her whānau who have carried the burden of trying to have their whenua returned.

TE TIRITI O WAITANGI PRINCIPLES AND DUTIES

10. Counsel submit that the principles of te Tiriti o Waitangi that are most

[2] Wai 1865, #1.1.1.

pertinent to the Wai 339 and Wai 1865 claims are the following:

a. Autonomy;

b. Active protection;

c. Tino rangatiratanga;

d. Partnership;

e. Equity;

f. Equality; and

g. Options.

THE EVIDENCE

11. The Tribunal will hear evidence from the following tangata whenua witnesses in support of Wai 339 claim:

a. Mr Dean Flavell (Terekaunuku) (Wai 1750, #E42);

b. Ms Keita Hudson (Wai 1750, #E30);

c. Ms Kym Katerina Hudson (Wai 1750, #E46);

d. Ms Jeanette Mitchell (Wai 1750, #E32);

e. Ms Renee Boyd (Wai 1750, #E45);

f. Ms Florence De Loree (Wai 1750, #E43);

g. Mr Winston De Loree (Wai 1750, #E33);

h. Mr Harold Ruff (Wai 1750, #E47);

i. Mr Neville Walker (Wai 1750, #E34);

j. Ms Donna Tunui (Wai 1750, #E32);

k. Ms Julie (Jule) Brooking (Wai 1750, #E48); and

l. Ms Deidre Maracki (Wai 1750, #E44).

12. The Tribunal will hear evidence from the following tangata whenua witnesses in support of the Wai 1865 claim:

a. Ms Miranda Horan (also on behalf of Wai 339) (Wai 1750, #E35);

b. Mr Rawaho (Joe) Pukepuke (Wai 1750, #E36);

c. Ms Jane Turner (Wai 1750, #E37); and

d. Ms Tui Pukepuke (Wai 1750, #E38).

13. The Claimants' evidence addresses the issues identified in the Wai 339 and Wai 1865 Amended Statements of Claim, and traverses the following themes:

a. Their early childhood memories of the Hiwarau Block, which for many was prior to the amalgamation of Hiwarau C in 1969;

b. The extent of their knowledge about the amalgamation and the administration of the Māori Trustee;

c. The extent to which their whānau was unable to give consent to the amalgamation of their whānau land;

d. The effect of the amalgamation and the administration of the Māori Trustee on their whānau;

e. The inability for those who have an interest in the Hiwarau C block to be able to live on their whenua; and

f. The changes in the Ōhiwa Harbour.

14. There may also be other tangata whenua witnesses who provide evidence in this Inquiry that supports this claim, and in turn the evidence of the witnesses above may support other claims engaged in this Inquiry.

15. The Claimants also rely on evidence provided in a number of technical report, including, but not limited to:

a. Dr Ewan Johnston *'Wai 203 and Wai 339 Research Report'* (Wai 894, #A14);

b. Jane Luiten *'Nineteenth-century Land Alienation and Administration within the North-Eastern Bay of Plenty Part One: Raupatu Lands'* (Wai 1750, #A12);

c. Suzanne Woodley *'Local Government and Māori Land Rating Issues Report'* (Wai 1750, #A26);

d. Heather Bassett and Richard Kay *'Public Works Issues c. 1870-2010'* (Wai 1750, #A29);

e. Bruce Stirling *'Twentieth Century Land Legislation and its Impacts'* (Wai 1750, #A32);

f. Peter McBurney *'Ngāti Muriwai Authority Trust Oral and Traditional History Report'* (Wai 1750, #A33); and

g. Dr Vaughan Wood, Dr Aroha Spinks, Dr Matthew Cunningham, Dr Tanja Rother, and Moira Poutama *'Environmental Issues Report'* (Wai 1750, #A34)

16. Where the Claimants' position differs from that of a technical witness, this has been, or will be, addressed under cross-examination, Claimant evidence and/or in closing submissions.

HISTORY OF THE HIWARAU BLOCK

The Hiwarau Reserve

17. The creation of the Hiwarau and Hokianga Island Reserves is comprehensively outlined in Jane Luiten's report *'Nineteenth-century Land Alienation and Administration within the North-Eastern Bay of Plenty Part One: Raupatu Lands'* and Dr Ewan Johnston's *Wai 203 and Wai 339*

Research Report'.[3]

The Partitioning of Hiwarau Reserve

18. In 1904, the Hiwarau Block was partitioned into two separate blocks - Hiwarau A (785 acres between 44 owners) and Hiwarau B (475 acres between 33 owners).

19. Soon after the 1904 partition, Hiwarau A and Hiwarau B were then partitioned into thirty individual land blocks.[4] Appended to these Opening Submissions as '**Appendix A**' is a table produced by Ewan Johnston outlining the creation, partition and amalgamation of Hiwarau Blocks.[5]

The Amalgamation of Hiwarau C

Background to the amalgamation of Hiwarau C

20. Following an application on 21 June 1967 for the vesting of Hiwarau A12 in the Māori Trustee, a Property Inspection Report prepared by the Office of the Māori Trustee noted that Hiwarau A12 could be used advantageously along with Hiwarau A11 and Hiwarau B. When the application came before the Māori Land Court on 8 September 1967, Judge K Gillanders Scott suggested for the Deputy Registrar to file an application under sections 435 and 438 of the Māori Affairs Act 1953.[6]

21. On 26 March 1969, the Registrar of the Māori Land Court filed an application to cancel the titles of 28 Hiwarau blocks[7] and Waiotahi Lots 275 and 276 and amalgamate the lands into one block. At the same time, the Registrar also applied for the land to be vested in the Māori Trustee under section 438 of the Māori Affairs Act 1953 for the purpose of leasing in whole or in parts. When making the application, the Deputy Registrar stated that the reasoning for the application was so that the lands could be more "conveniently worked or dealt with as if held in common ownership under

[3] Dr Ewan Johnston (Wai 894, #A14) '*Wai 203 and Wai 339 Research Report*' at pp. 28-68; Jane Luiten (Wai 1750, #A12) 'Nineteenth-century Land Alienation and Administration within the North-Eastern Bay of Plenty Part One: Raupatu Lands' at pp. 173-209.
[4] Hiwarau A1 - A12 and Hiwarau B1A, B1B1, B1B2, B1C, B1D, B2, B3A, B3B, B3D, B4A, B4B, B4C, B4D, B4E, B4F, B4G.
[5] Dr Ewan Johnston (Wai 894, #A14) '*Wai 203 and Wai 339 Research Report*' at pp. 77-79.
[6] Dr Ewan Johnston (Wai 894, #A14) '*Wai 203 and Wai 339 Research Report*' at p. 82.
[7] Hiwarau Al to A12, BIA, BIB1, BIB2, BIC, BID, B2, B3A to B3D, B4A to B4G.

one title."[8]

The hearings regarding the amalgamation application

22. An initial hearing regarding the application was held on 24 June 1969, with subsequent hearings held on 1 July 1969, 31 July 1969, and 1 August 1969. Despite an initial notice of the application for amalgamation being sent to owners, no further notice was sent notifying owners of an amendment to the application. It was found in the Māori Land Court erred in its decision to amalgamate Hiwarau C and that notice should have been sent out to the owners. By failing to do so, Deputy Chief Judge McHugh found the Court committed an omission sufficient to justify variation to the amalgamation order.[9]

23. For many owners, they never received notice of the application to amalgamate the land block. For the few who did receive a notice, they were unable to attend the hearings due to work commitments and having moved away from Hiwarau for employment. Regardless of whether owners did or did not receive notice, they did not provide consent for their land to be amalgamated, and the Claimants' evidence is that the owners would have vehemently opposed the amalgamation. For those who did attend the hearings, they objected to the amalgamation and subsequently had their land removed from the application.

The amalgamation of Hiwarau C

24. In August 1969, under section 435 of the Māori Affairs Act 1953, the Māori Land Court cancelled the titles of 20 individual Hiwarau Blocks and Lots 275 and 276 Parish of Waiotahi.[10] These rescinded blocks were then amalgamated into one title (Hiwarau C) totalling 937 acres 3 roods 33 perches.[11]

[8] Wai 894, #A14 at p. 79 citing Opotiki minute book 45, fol 118, 4 August 1969.
[9] 1993 Chief Judge's Minute Book Folio 256-260.
[10] Ōpōtiki Minute Book 45, fol 118, 4 August 1969; Dr Ewan Johnston (Wai 894, #A14) 'Wai 203 and Wai 339 Research Report' at p. 79.
[11] The blocks that were amalgamated into Hiwarau C were Hiwarau Al; A2; A3; A4; A5; A7; A8; Al0; A12; B1A; B1Bl; B1B2; B2; B3D; B4A; B4B; B4D; B4E; B4F; B4G; and Waiotahi Lots 275 and 276.

The administration of the Māori Trustee

25. At the same time as the creation of Hiwarau C, the block was also vested in the Māori Trustee under section 438 of the Māori Affairs Act 1953. Between 1969 and December 1992, the land was under the control of the Māori Trustee.[12] The Claimants' evidence will show that during the period when Hiwarau C was the Maori Trustee's responsibility to manage it in the best interests of the owners, the Māori Trustee allowed the land block to become overgrown with scrub, failed to address rental and rate arrears, and failed to carry out the wishes of owners in the Hiwarau C block. The Claimants' evidence will also show that the Māori Trustee failed to recognise the connection that the Claimants had to their whenua, by evicting descendants of owners from their whānau homes. The evidence will also show that the Māori Trustee administration created social disharmony between various owners as they had no option but to assert their rights against one another.

26. Due to the increasing dissatisfaction with the Māori Trustee's administration, rather than rectifying the situation and doing the job for which the Māori Trustee had been appointed by the Court, the Māori Trustee lodged an application with the Māori Land Court in 1992 seeking to be removed as responsible trustee for Hiwarau C. on 1 December 1992, the Māori Land Court then vested Hiwarau C in the Hiwarau Lands Trust, under sections 438(5) and 438(3)(b) of the Māori Affairs Act 1953. The new trustees were Tuiringa Mokomoko, Phillip Wilson, Paku Edwards, Josphine Mortensen, and Alamein Kopu.[13]

CROWN BREACHES

27. As set out in the Wai 339 and Wai 1865 Amended Statement of Claim,[14] the Claimants assert that through its acts and omissions, the Crown has breached te Tiriti o Waitangi in numerous ways, including a number of its term and principles. The particulars are:

[12] Dr Ewan Johnston (Wai 894, #A14) '*Wai 203 and Wai 339 Research Report*' at p. 89.
[13] Dr Ewan Johnston (Wai 894, #A14) '*Wai 203 and Wai 339 Research Report*' at p. 117.
[14] Wai 339, #1.1(e); Wai 1865, #1.1(a).

a. The inadequate allocation of the Hiwarau Reserve;

b. The design and creation of the Māori Affairs Act 1953, in particular sections 137, 435 and 438;

c. The design and creation of the Māori Trustee regime;

d. The failure to oversee the Māori Trustee regime;

e. The Conversion Programme;

f. The failure to oversee Local Authorities;

g. The failure to assist the Hiwarau C Trust in developing housing;

h. The degradation of the Ōhiwa Harbour; and

i. Matekerepū Scenic/Historic Reserve.

The Inadequate Allocation of Reserve Land

28. The Claimants assert that the Crown breached te Tiriti o Waitangi by failing to provide an adequate allocation of land following the raupatu. The Hiwarau Reserve was on marginal and steep land. This will be expanded upon further in Closing Submissions.

Section 435 of the Māori Affairs Act 1953

29. The Crown's creation of the Māori Affairs Act 1953 provided the Māori Land Court with the 'special power' to rescind Māori freehold title and then amalgamate adjoining Māori freehold land, without the consent of the owners under s 435 of the Act. Only consent from lessees and mortgagees was required when amalgamating land.[15] The Claimants state that the Crown's legislation was coercive, diminished their tino rangatiratanga, and was discriminatory towards Māori freehold land, as there was no provision to the same effect for general freehold land.

30. Despite the Crown being responsible for establishing the statutory regime

[15] Waitangi Tribunal (Wai 2478) *He Kura Whenua ka Rokohanga: Report on Claims about the Reform of Te Ture Whenua Māori Act 1993* at p. 34.

that led to the amalgamation of Hiwarau C and vesting of the block's administration in the Māori Trustee, the Crown has since failed to assist Hiwarau C owners in de-amalgamating/partitioning Hiwarau C back to the land blocks prior to the 1969 amalgamation. This failure to assist is despite Wai 339 claim being originally filed in 1992, with the Crown being put on notice since then about the prejudice experienced by Hiwarau C.

The Māori Trustee Regime

31. The Claimants assert that the Crown breached te Tiriti o Waitangi by establishing the Māori Trustee regime. It is the Claimants position that, if not for the establishment of the Māori Trustee regime, the harms that have been experienced by the owners as outlined in paragraphs 25 and 26 and in Claimant evidence, would never have occurred.

32. As found in *He Whiritaunoka: the Whanganui Land Report*:[16]

> *… the Crown was responsible for the design of the regime, and any negative outcomes that flowed from that. It was obliged to monitor the scheme to ensure that it fulfilled its statutory objectives and remained what Māori wanted and had agreed to. It should have been ready to respond if and when things went off course.*

33. No evidence has been produced so far to show that the Crown had oversight over the Māori Trustee, or monitored its activities, or lack of them, and made no attempt to ensure the Māori Trustee was upholding its statutory duties as set out in the Māori Trustee Act 1953.

34. The Waitangi Tribunal stated in the *He Kura Whenua ka Rokohanga Report*, that "owner autonomy was gravely compromised by the 1953 legislation and the power given by the court and the Māori Trustee."[17] Upon Hiwarau C being vested in the Māori Trustee under section 438, owners were no longer able to exercise authority over their whenua, as the administration was with the Māori Trustee.

[16] Waitangi Tribunal (Wai 903) *He Whiritaunoka – The Whanganui Land Report – Volume II* at p. 685.
[17] Waitangi Tribunal (Wai 2478) *He Kura Whenua ka Rokohanga: Report on Claims about the Reform of Te Ture Whenua Māori Act 1993* at p. 33.

35. The Claimants assert that if not for the establishment of the Māori Trustee regime, none of the harms would have been inflicted on the Hiwarau C owners. Despite the Crown being obliged to monitor the Māori Trustee, the Crown failed to do so, thereby failing to protect the interests of Hiwarau C owners.[18]

The Conversion Programme

36. Conversion, a programme designed by the Crown, was aimed at reducing the number of owners on a title under the Māori Affairs Act 1953 and the Māori Affairs Amendment Act 1967.

37. When Hiwarau C was amalgamated in 1969, the Māori Trustee held 154.08 of the 20,400 shares, accumulated under section 137 of the Māori Affairs Act 1953. Section 137 allowed the Māori Trustee to compulsorily acquire any 'uneconomic shares'[19] without the consent of the owners.

38. The Māori Trustee subsequently accumulated a total of 394.1 shares, which were later transferred to other owners.[20]

39. This resulted in owners being disconnected from their traditional whenua. Whilst Hiwarau C remains as Māori freehold today, the conversion policy nonetheless alienated landowners.

40. As conceded by the Crown in the *Te Manu Whatu Ahuru Report on Te Rohe Pōtae Claims*, compulsory conversion under the Māori Affairs Act 1953 and the Māori Affairs Amendment Act 1967 was contrary to the principles of the Treaty of Waitangi.[21] Counsel submit that the circumstances and the regime for conversion are the same in the North-Eastern Bay of Plenty District Inquiry and therefore, it is open to this Tribunal to make a finding that the conversion was in breach of te Tiriti o Waitangi.

Local Government and Rating

[18] Waitangi Tribunal (Wai 903) *He Whiritaunoka: The Whanganui Land Report 2015*, Volume II at p. 685.
[19] Under the Māori Affairs Act 1953 an interest was deemed to be 'uneconomic' when worth £25 or less at the point of succession.
[20] Bruce Stirling (Wai 1750, #A32) *Twentieth Century Land Legislation and Its Impacts,* at p. 387.
[21] Waitangi Tribunal (Wai 898) *Te Mana Whatu Ahuru Report on Te Rohe Pōtae Claims*, Volume III at [16.8].

41. The Claimants assert that the Crown has breached te Tiriti o Waitangi through the rating of Hiwarau C.

42. Counsel respectfully acknowledges and adopts the findings that previous Tribunals have made that whilst local authorities may not be agents of the Crown, the Crown still retains an overall duty of active protection towards Māori interests. This duty of active protection requires the Crown to monitor local government policies and practices, to ensure they are compliant with te Tiriti o Waitangi.[22]

43. The Claimants will bring evidence to show that the Crown has failed to actively protect their interests by allowing land blocks to be "double-rated" and for rates to imposed on Māori freehold land, despite receiving minimal services from the Council.

The Inability for Hiwarau C Owners to Live on their Land

44. Today, owners in the Hiwarau C block are unable to build and live on their land, due to the amalgamation of Hiwarau C. As a result of the Crown creating a regime that allowed for Hiwarau land to be amalgamated, and owners not being able to develop on their land, some owners have no other option than to squat on their land. The Claimants' evidence will show that many squatters try to return to their ancestral land.

The Degradation of Ōhiwa Harbour

45. The Claimant evidence will show that over time, the taiao of the Ōhiwa Harbour has degraded so significantly that the Claimants struggle to maintain customary practices. The evidence will show that there has been a decrease in kai moana, a deterioration in the mudflat quality, pollution, and an increase in mangroves, which has been access to kai moana increasingly more difficult.

Matekerepū Scenic/Historic Reserve

46. The Crown breached te Tiriti o Waitangi by acquiring Matekerepū as a Scenic

[22] Waitangi Tribunal (Wai 215) *Tauranga Moana, 1886 – 2006: Report on the Post-Raupatu Claims,* Volume I at p. 488.

Reserve in 1912. Matekerepū Scenic Reserve was 48 acres 1 rood 0 perches of Hiwarau A land. Despite protest by Hiwarau A owners against this area of land becoming a reserve, the Crown failed to address such concerns and actively acted against the owners' interests. [23] In October 1979, the reserve was re-classified as Matekerepū Historic Reserve, after the discovery of Whakarae.[24]

47. Despite the reserve being under the control of the Department of Conservation, the Crown has nonetheless allowed a power pylon to be placed on part of where Whakarae Pā once was, causing irreversible damage. The Claimants will bring evidence to show that the Crown has failed to protect this site.

PREJUDICE AND RELIEF SOUGHT

48. As a result of the Crown's legislation, acts, omissions, practices, and policies referred to in the causes of action set out above, the Claimants have suffered the following prejudicial effects:

    a. the significant land loss and displacement within their rohe following the raupatu;

    b. allocation on to land that was unsuitable for sustainable and productive cultivation, and inadequate for supporting future generations;

    c. the fracturing of interests in the Hiwarau Reserve;

    d. the amalgamation of their land into Hiwarau C which was then vested in the Māori Trustee;

    e. the taking of their land for public works despite not having enough arable and sustainable land; and

    f. the Crown's assumption of management over the Ōhiwa Harbour,

[23] Jane Luiten (Wai 1750, #A12) *'Nineteenth-century Land Alienation and Administration within the North-Eastern Bay of Plenty Part One: Raupatu Lands'* at pp. 203-205; Heather Bassett and Richard Kay (Wai 1750, #A29) *'Public Works Issues c. 1870-2010'* at pp 312-324.
[24] For further information regarding Whakarae please refer to Dean Flavell's Brief of Evidence in the Ngā Kōrero Tuku Iho Phase of the North-Eastern Bay of Plenty District Inquiry (Wai 1750, #C57).

leading to its degradation.

49. The Claimants seek findings from the Tribunal that their claims are well founded in respect of those issues, and any other issues that the Tribunal so determines.

50. Ultimately, what the Claimants seek from the Tribunal is a recommendation that the Crown compensate the landowners of Hiwarau for the loss they have suffered through the deprivation of use and inability to occupy their ancestral land.

51. Compensation in that regard can take many forms, and therefore, the Claimants seek the following recommendations from the Tribunal:

    a. Hiwarau C to be partitioned back to the 1969 titles that existed prior to the amalgamation and that the owners and subsequent beneficiaries as noted in the Māori Land Court be made owners of those blocks;

    b. a partition of Hiwarau C which would allow descendants of the original owners and their whānau to be grouped as owners and manage their land, create homes, and support themselves independent of other whānau, hapū, or iwi groups currently registered as Hiwarau C owners;

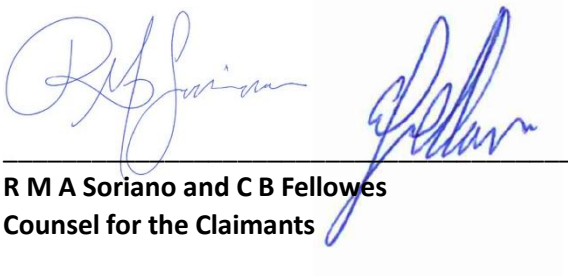
    c. that the Crown, in recognising its role in contributing (via its agents) to the current state of Hiwarau C block, pay the costs of partitioning Hiwarau C and returning it to the appropriate owners;

    d. the Crown provide resources and support to the Claimants and other owners of Hiwarau C, including education and training programmes on land management, financial management, and legal rights of landowners; and

    e. incorporation by Crown agencies, and delegates such as local authorities of cultural considerations into land management practices, facilitating the protection of significant sites, and ensuring Māori participation in decision-making process related to land use

and conservation.

Dated at Te-Whanganui-a-Tara this 4th day of November 2025



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