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Document control

Title: Preliminary Site Investigation (Soil Contamination)					
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1 Introduction and background

Tonkin & Taylor Ltd (T+T) has been engaged by Nelson City Council (NCC) to provide a Preliminary Site Investigation (PSI) relating to the potential for soil contamination within the five project portions of Area 1 works along the banks of the Maitai River (the Site), Nelson. The existing stop banks along the Maitai River, located beside Hanby Park to 5A Clouston Terrace, are overtopped during major flooding events, the most recent event occurring during the August 2022 event. The proposed flood improvement works will reduce the frequency and magnitude of overtopping occurring along this stretch.

This report has been prepared in general accordance with the requirements for a PSI referred to in the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NESCS) regulations¹, and as outlined in the Ministry for the Environment (MfE) Contaminated Land Management Guidelines². The report has also been prepared in accordance with our Variation Order dated 9 May 2025.

The persons undertaking, managing, reviewing, and certifying this assessment are suitable qualified and experienced practitioners (SQEP), as required by the NESCS and defined in the NESCS Users' Guide (April 2012).

1.1 Objective and scope

The objective of this PSI is to assess whether contaminated soils are present in areas of proposed excavation, areas of potential soil reuse and areas at risk of inundation from flooding. In addition, the PSI will determine whether sampling is required to confirm the nature and extent of soil contamination. The scope of work included:

- A preliminary desktop review of the site history and.
- A site walkover.

The preliminary desktop review included:

- Reviewing the historical aerial photographs from the T+T library and online available sources (i.e. Retrolens, Google).
- Reviewing the NCC Hazardous Activities and Industries List (HAIL)³ maps and database.
- Reviewing the Records of Titles associated with the lots where soil excavation or flood inundation could occur as a result of the proposed flood mitigation measures.

Following the preliminary desktop review a site walkover was undertaken to observe whether there was evidence of sources of potential contamination at the Site and adjacent to the Site, which could have potential implications for soil excavation and management.

¹ [Resource Management \(National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health\) Regulations 2011 \(SR 2011/361\) – New Zealand Legislation.](#)

² <https://environment.govt.nz/assets/publications/Files/contaminated-land-management-guidelines-no-1.pdf>.

³ [HAIL.pdf](#).

2 Site description

2.1 Site identification

This PSI focuses on five portions of work within Area 1 works which cover the stops banks along the true left and right sides of the Maitai River, comprising approximately 2 ha. The general location of the current site investigation area is outlined in **Figure 2.1** and **Figure 2.2** shows the location of the portions along the Maitai River. Existing stop banks run from Hanby Park to 5A Clouston Terrace on the true left of the river. Portions 1 and 2 are zoned as ‘Open Space Recreation’ and portions 3, 4, and 5 are zoned as ‘Residential’ under the Nelson Resource Management Plan⁴. Further site identification information is detailed below in **Table 2.1**.



Figure 2.1: Site location. Basemap source: NZ Topomap.

⁴ [Map - Nelson Resource Management Plans.](#)



Figure 2.2: Proposed project portions at the Site.

Table 2.1: Site identification information

Portion 1	
Street address	Hanby Park, Maitai, Nelson 7010
Site area	Approx. 4600 m ²
Zoning	Open Space Recreation
Portion 2	
Street address	Hanby Park (true right side) and 2 Hanby Park to 23B Mill Street, Maitai, Nelson 7010
Site area	Approx. 6,165 m ²
Zoning	Open Space Recreation
Geographic coordinates	1643918.3 (m) E, 5388709.1 N (m)
Portion 3	
Street address	23B Mill Street to Clouston Bridge (219 Nile Street East), Maitai, Nelson 7010
Site area	Approx. 320 m ²
Zoning	Residential
Geographic coordinates	1643918.3 (m) E, 5388709.1 (m) N

Portion 4	
Street address	From 219 Nile Street East (underneath Clouston Bridge) to 5A Clouston Terrace, Maitai, Nelson 7010
Site area	Approx. 2,775 m ²
Zoning	Residential
Geographic coordinates	1643872.0 (m) E, 5388602.4 (m) N
Portion 5	
Street address	5 Maitai Valley Road to 204A Nile Street East, Maitai, Nelson 7010
Site area	Approx. 2,705 m ²
Zoning	Residential
Geographic coordinates	1643824.5 (m) E, 5388534.5 (m) N

2.2 Site condition and surrounding land use

The Site area includes the stopbanks and riverbanks to the true left and true right of the Maitai River. Portions 1 and 2 are located within the recreational area Hanby Park, largely comprised of grassed slopes. The height of the bank above the river varies at different locations. There is a Disc Golf Course to the true right of the river and a pathway on either side of the river within Hanby Park. Portions 2, 3, 4 and 5 are surrounded by residential properties and intersect with slopes leading to the river, which are moderately vegetated.

It is important to note that the vegetation cover at the Site limited the ability to observe the ground surface, particularly adjacent to residential areas. The slope of the riverbanks and private property were also limiting factors impacting access during the site walkover.

2.3 Geology

2.3.1 Mapped geology

The geology of the Site is mapped in the Revised Geological Map of the Nelson-Richmond Urban Area (Johnston et al. 2024⁵) which indicates that the Site is underlain by the Appleby Gravel Formation. The neighbouring hillslopes are comprised of various units of the Brook Street Volcanics Group, as shown in **Figure 2.3**.

The Appleby gravel comprises interbedded layers of well sorted (poorly graded) gravel with sand, silt and clay such as:

- Medium dense to dense, silty fine to coarse gravel with some cobbles.
- Stiff to hard, sandy silt with some gravels.
- Dense, sandy fine to coarse gravel with some cobbles.

For further detail, refer to the Hanby Park Stopbank Geotechnical Investigation Report⁶.

T+T internal databases of GNS Geology indicate that the Maitai River is comprised of well sorted gravels which form modern flood plains.

⁵ Revised Geological Map of the Nelson-Richmond Urban Area, Mike R. Johnston, Francesca Ghisetti and Paul Woperis (v4-2024).

⁶ T+T, 2024. *Hanby Park Stopbank Geotechnical Investigation*. Prepared for NCC by Tonkin + Taylor, 26 June 2024. T+T Ref: 1006675.5170.

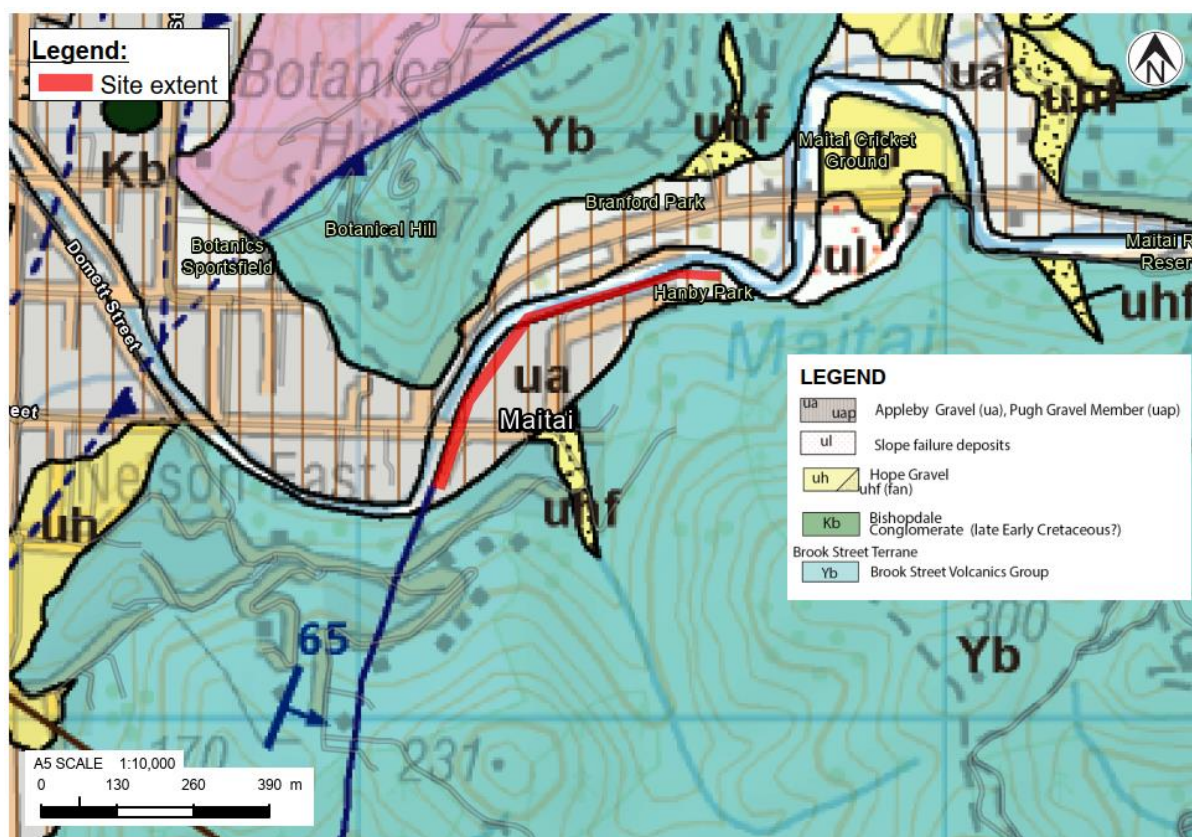


Figure 2.3: The geology at the site and the surrounding area⁷.

The natural geology of the Maitai River channels has been modified within the site for flood/scour protection purposes including the true right bank north of Nile Street East where filling has recently occurred.

2.4 Hydrology

Shallow groundwater within the portions of work, as described above in Section 2.1, is inferred to flow towards the Maitai River.

The nearest surface water body, aside from the Maitai River, is Tasman Bay located approximately 3.2 km from the Site. The Maitai River drains to Tasman Bay next to Port Nelson, 2.4 km from the Site.

The NCC Top of the South Maps⁸ indicate that there are approximately 13 stormwater outfalls which discharge into the Maitai River across the Site. The majority of the outfalls discharge from residential areas, with the exception of the outfalls that discharge from Hanby Park and those situated adjacent to Maitai Valley Road.

⁷ Johnston, M.R., Ghisetti, F., Wopereis, P. 2021. Revised geological map of the Nelson-Richmond urban area.

⁸ [Top of the South Maps](#)

3 Previous site investigations

T+T has previously completed geotechnical site investigations and assessment⁹ in 2024 to assess the stopbank crest height and geotechnical condition with reference to modern design standards. The geotechnical report was limited to certain areas on Site which did not necessarily target the project portions. The following information is relevant to this assessment and is summarised below:

- T+T commissioned McMillan Drilling in April 2024 to drill four investigatory boreholes at the Site (at the stopbank crest opposite 5A Clouston Terrace, 32 Mill Street and 10 Mill Street and on the slope on the river side of stopbank crest opposite 219 Nile St East) and install groundwater monitoring standpipe piezometers.
- The subsurface ground condition encountered in the boreholes included gravelly silts between 0 and 2.8 m bgl and interbedded layers of silts, sands and gravel mixtures to the base of the boreholes (8 m bgl). The subsurface ground condition was assessed at only four locations in this investigation, therefore, the subsurface soils may vary between the portions.
- Of particular note for stopbank assessment and design, were the interbedded layers of highly permeable gravels observed at different depths in the drill core. These gravel layers are likely to facilitate high horizontal groundwater flows during flood events.
- The assessment included a site walkover and noted locations where particularly significant scouring along the river was occurring, leading to the potential of material being entrained into the river.

Refer to the geotechnical report⁹ for further details on the assessment, ground conditions and conclusions.

4 Site history review

Historical information on potential sources for contamination has been reviewed. This site history review focuses on onsite activities, except for the aerial photograph review where comments are also provided on readily observable surrounding land use. The information reviewed is summarised in the following sections.

4.1 Aerial photograph review

Historical aerial photographs were obtained for review from NCC Top of the South Maps⁸ and Retrolens. Relevant features of the Site area and surrounding land features for the wider site are summarised from each aerial photograph in **Table 4.1** Aerial photographs with significant features identified are appended in **Appendix A**.

⁹ T+T, 2024. *Hanby Park Stopbank Geotechnical Investigation*. Prepared for NCC by Tonkin + Taylor, 26 June 2024. T+T Ref: 1006675.5170.

Table 4.1: Historical aerial photograph review

Aerial Photograph (date and source)	Key points identified within the Site area		Key points identified within the surrounding wider site	
1948 (Retrolens)	Portion 1	Has a moderately dense vegetation cover with sections of land which appear to be cleared of vegetation.	Portion 1	Sits adjacent to a grassed field and what appears to be market gardens. To the south is a grassed hill with regenerating vegetation.
	Portion 2	All three portions are moderately vegetated along the perimeters closest to the river, with some tree/bush cover	Portion 2	All three portions sit adjacent to grassed fields which span then entire length of each portion.
	Portion 3		Portion 3	
	Portion 4		Portion 4	
	Portion 5	Appears to be grassed with some vegetation cover.	Portion 5	Is surrounded by residential properties and two grassed sections of land, which may be residential property or recreational land (potentially sports fields). To the west of portion 5 are large warehouses.
1960 (Retrolens)	Portion 1	The vegetation adjacent to the river within portion 1 appears to have been cleared, with some larger trees remaining. Most of the portion appears to be grassed land. A gravel walkway is visible running parallel to the Maitai River.	Portion 1	The market gardens in portion 1 appear to have been disestablished and replaced with residential properties.
	Portion 2	All three portions appear to have reduced vegetation cover, with an absence of larger trees and bush cover. Within portion 4, Clouston Terrace has been formed sometime between 1948 and 1960.	Portion 2	All three portions sit adjacent to grassed fields which span then entire length of each portion. Significant residential development has occurred adjacent to portions 2 and 3.
	Portion 3		Portion 3	
	Portion 4		Portion 4	
	Portion 5	Remains unchanged from the previous image, with moderate vegetation cover and grasses.	Portion 5	No major changes to land use are observed surrounding Portion 5.
1969 (Retrolens)	Portion 1	Minor vegetation clearance appears to have occurred within all portions and little to no land use change is observed from the previous image.	Portion 1	There are no significant changes observed from the previous image.
	Portion 2		Portion 2	A road on the left side of the Maitai River has been established adjacent to portion 2.
	Portion 3		Portion 3	There are no significant changes observed from the previous image.

Aerial Photograph (date and source)	Key points identified within the Site area		Key points identified within the surrounding wider site	
	Portion 4	Clouston Terrace within Portion 4 has been sealed sometime between this image and 1960.	Portion 4	There are no significant changes observed from the previous image.
	Portion 5	Minor vegetation clearance appears to have occurred within all portions and little to no land use change is observed from the previous image.	Portion 5	A road on the left side of the Maitai River has been established adjacent to portion 5.
1977-1983 (Retrolens)	Portion 1	There are no significant changes observed from the previous image.	Portion 1	There are no significant changes observed from the previous image.
	Portion 2		Portion 2	
	Portion 3		Portion 3	
	Portion 4		Portion 4	
	Portion 5		Portion 5	
2005 (Google Earth)	Portion 1	There are no significant changes observed from the previous image.	Portion 1	There are no significant changes observed from the previous image.
	Portion 2		Portion 2	
	Portion 3		Portion 3	
	Portion 4		Portion 4	
	Portion 5	Additional residential housing has been constructed immediately adjacent to the southern end of portion 5.	Portion 5	The warehouses marked as HAIL activity, adjacent to portion 5 have been disestablished and replaced by residential properties.
2024 (NCC map viewer)	Portion 1	A path has been established along the right side of the riverbank through portions 1, 2, 3 and 4.	Portion 1	There are no significant changes observed from the previous image.
	Portion 2		Portion 2	The grassed area north of portion 2 is currently used as a Disc Golf Course.
	Portion 3		Portion 3	changes observed from the previous image.
	Portion 4		Portion 4	
	Portion 5	There are no significant changes observed from the previous image.	Portion 5	

4.2 Nelson City Council contamination enquiry

NCC holds a database of areas in the Nelson region where known or suspected HAIL activities are taking or have taken place. This database is publicly available in a map format accessible via an NCC webpage. All works portions were checked against the Nelson HAIL Sites map. The map indicated that none of the portions are intersecting or have intersected recorded HAIL activities. There were three identified HAIL sites within close proximity to proposed work portions. The identified HAIL sites and locations are detailed in **Table 4.2** below and on **Figure 4.1**.

Table 4.2: Identified HAIL sites within proximity to the portions

HAIL ID	Date	Distance/location from Site	HAIL description
10014	Active: sometime pre-1948. Closed: between 1983 and 2005	Approximately 190 m to the west of portion 5.	A10. Persistent pesticide bulk storage or use including sport turfs, market gardens, orchards, glass houses or spray sheds.
10012	Active: sometime pre-1948. Closed: between 1983 and 2005	Approximately 100m to the west of portion 5.	
10854	Active: sometime pre-1948. Closed: between 1948 and 1962.	Approximately 200m to the east of portion 3.	

**Figure 4.1: Identified HAIL areas**

4.3 Record of Titles review

A review of the Record of Titles for the lots which fall within the portions was undertaken to assess whether any previous land use activities could be associated with contamination sources. The Record of Titles were all related to the purchase of land and mortgage information for the sale of residential properties. The review did not provide any indication of activities associated with contamination and subsequently these have not been included in the appendices of the report, however, the lots and associated Record of Titles which were reviewed are listed in **Table 4.3** below.

Table 4.3: Lots and associated Record of Titles

Lots	Record of title
Portion 4	
4009 Lot 5	No Record of Title.
Portion 5	
12394 Lot 6	No Record of Title.
12394 Lot 5	No Record of Title.
18581 Lot 3	NL36/154
18581 Lot 4	NL36/154
393 Lot 3	NL38/51
10642 Flat 1	NL38/51
10642 Flat 2	NL38/51

5 Site walkover

A site walkover was undertaken on 30 May 2025 by a T+T environmental scientist. The purpose of the walkover was to gather general information on land use and make observations for evidence of potential contamination. Photographs from the site inspection are included in **Appendix B**. It should be emphasised that the slope of the riverbanks and private property were limiting factors impacting access during the site walkover. As a result, some areas of the portions were unable to be observed, in particular the riverbanks of portions 2 and 5. These portions were viewed from the other side of the river.

Portion 1

- Gravelled Hanby Park car park at the end of Mill Street, situated 15 m from the base of the existing stopbank (Photograph B.2).

Portion 2

- Gravel walking path on the true left side of the Maitai River (Photograph B.3).

Portion 3

- A gravel path runs along the top of the current stopbank on the true left side of the river (Photograph B.4 and B.5).

Portion 4

- A gravel path runs along the top of the current stopbank on the true left side of the river (Photograph B.6). Some riprap erosion protection is in place along the riverbank.
- At the time of inspection, a pile of gravel (6 m x 3 m) with a small excavator sitting on top was located at the end of Clouston Terrace (Photograph B.8).

Portion 5

- A brick foundation, potentially a retaining wall, was observed on the riverbank at the back of 212 Nile Street and beside 210A Nile Street, however, access to this area was limited.
- Some remedial works and gabion baskets as scour protection were visible along part of the Maitai Road section of the north of the bridge, with small slips evident (Photograph B.11).

Other observations of note

- Near (but not within) portion 1, there was visible scour of the true left side of the riverbank exposing black carbonaceous material, which could be of anthropogenic origin, 1.5 m in length (Photograph B.13). Also observed within the scour was a ceramic pipe fragment. Fragments of asphalt and a piece of rail material were scattered across the surface but not embedded in the scour (Photograph B.15). It is not clear whether this material was derived from the riverbank, deposited from the river or is of anthropogenic origin.
- Also near (but not within) portion 2, there are rammed railway irons along the eastern end of portion 2, as scour protection (Photograph B.16). The surface above the rammed railway irons appears to be capped, preventing observations of the material beneath the capping.

The callout images in **Figure 5.1** below shows the location of activities mentioned above, relative to the portions within the site area. As shown in the figure, the carbonaceous material containing ceramic pipe fragments and rail material (Photograph B.13) is not located within any portion and therefore will not be disturbed during construction works. For that reason, this area has not been highlighted as a potential source of contamination affected by the flood improvement works and sampling of this area is not required. Also shown in the figure is the scour protection (Photograph B.6), which is also located outside portion 2.

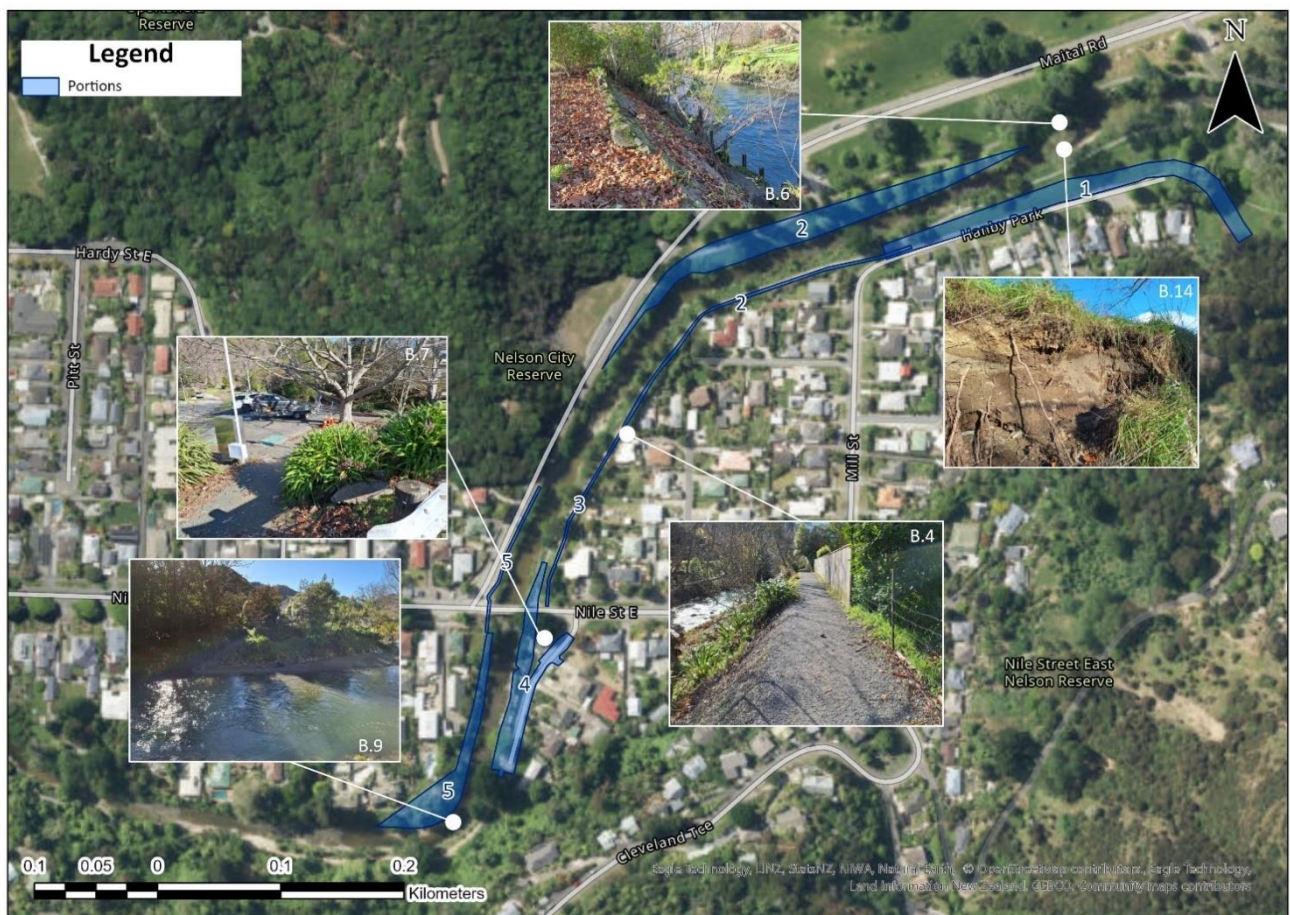


Figure 5.1: Site layout with image callouts.

6 Summary of information review

The site history review has identified the following:

The portions have had little development over the years, with the areas mainly being grassed with river side walkways being established. The riverbanks and slopes have been further reinforced with scour protection measures such as boulder protection, gabion baskets and rail material, but no evidence of major modifications to the river have occurred.

The Clouston Terrace carriageway appears to have been formed sometime between 1948 and 1960, according to the historical aerial imagery. This road then appears to have been sealed between 1960 and 1969, which falls within the time period when coal tar was used to seal roads in New Zealand (until the 1980s)¹⁰.

Market gardens sites (HAIL category: A10) were identified at a distance from the portions. The market garden sites to the east of the Maitai River (closest to portion 1) were evident pre-1948 and residential housing was developed sometime between 1948 and 1960, based on the aerial imagery review. The market gardens located to the west of the Maitai River (closest to portion 2 and 5) were opened sometime pre-1948 and active until sometime between 1983 and 2005. During this time, residential housing replaced the market gardens.

The observed market gardens in the 1948 historical imagery extends further than the identified HAIL polygon displayed on the NCC HAIL maps and was observed to end adjacent to the south of portion 1. Although this identified area is adjacent to portion 1, there appears to be no overlap into where the earthworks will be occurring.

None of the mentioned HAIL sites are located within the earthwork areas and during the site walkover undertaken in May 2025, no signs of current or former contamination from these historical activities were identified within the portions.

6.1 NESCS applicability

The NESCS came into effect on 1 January 2012. This legislation sets out nationally consistent planning controls appropriate to district and city councils for assessing contaminants in soil with regard to human health. As a result, the NESCS prevails over the rules in a District or Unitary Plan, except where the rules permit or restrict effects that are not dealt with in the NESCS.

The NESCS applies to specific activities on land where a HAIL activity has occurred or is more likely than not to have occurred in the past. Activities covered under the NESCS include soil disturbance, soil sampling, fuel systems removal, subdivision, and land use change.

Given that potentially contaminating activities were **not** identified within the portions where earthworks or soil disturbance will be occurring, the NESCS will **not** apply. If earthworks or soil disturbance occurs within the area that was identified as a market garden to the south of portion 1 sampling may be required to characterise the soils from that area.

Another area important to note is the roading through Clouston Terrace, since this was formed within the period when coal tar was commonly used in road formation and may be disturbed during earthworks. If earthworks are occurring and there is a potential that coal tar is present in the roading, then testing may need to be undertaken. If coal tar is detected, portion 4 would likely meet the threshold for HAIL I and therefore NESCS **will** apply. If coal tar is not detected in Clouston Terrace, no HAIL activities will be disturbed by the proposed works and therefore the NESCS will **not** apply.

¹⁰ WasteMINZ Guidelines for Assessing and Managing Coal Tar Contamination in Roding. Derived from [Coal tar in roading guidance Version 1.0 December 2023.pdf](#).

7 Conclusions

T+T was engaged by NCC to conduct a PSI within the area of the proposed flood improvement works along the Maitai River. The objective of the investigation was to characterise potential contaminant concentrations in soils within targeted areas, where work is proposed along the Maitai River.

The key findings of the investigation are:

- No historical activities that could lead to contamination were identified within the proposed portions at the Site were identified during the aerial review. While the review identified an area of former market gardens adjacent to portion 1, this does not extend into the earthworks area.
- Clouston Terrace, located in portion 4, was formed when coal tar was being used in New Zealand to seal roads and therefore testing for coal tar may be necessary, if the Clouston Terrace Road is raised or disturbed during earthworks.
- Maintenance, modification and repair to the Maitai River was observed to be minimal, with little to no indication of use of fill. Additional measures of protection such as boulder protection, gabion baskets and rail material have been used to reinforce the riverbanks.
- No current or former HAIL activities were identified within the portions at the Site. Former HAIL activities of former market gardens/horticultural activities (HAIL category A10) were identified in the surrounding areas of the Site, however, do not impact the current portions.
- No indication of activities associated with contamination were identified within the Record of Titles reviewed for this investigation.
- The site walkover provided no indication of current or former activities associated with contamination. It is important to note that there was not adequate access to the entirety of the riverbanks for observation, and therefore there is a possibility that areas of fill, especially where riverbanks back onto residential properties, were not identified during the site walkover. If unexpected discovery of potential contamination occurs, the material may need to be assessed.
- Given that potentially contaminating activities were not identified within the portions where earthworks or soil disturbance will be occurring, the NESCS will not apply. If earthworks or soil disturbance occurs within the area that was identified as a market garden to the south of portion 1 sampling may be required to characterise the soils from that area. In addition to this, if the existing road at Clouston Terrace is disturbed during earthworks and there is a potential that coal tar is present, then testing may need to be undertaken. If coal tar is detected, HAIL I will be applicable to portion 4 and NESCS would apply. If coal tar is not present in Clouston Terrace, this would not be considered a disturbance of HAIL activity and therefore the NESCS will not apply.

8 Applicability

This report has been prepared for the exclusive use of our client Nelson City Council, with respect to the particular brief given to us and it may not be relied upon in other contexts or for any other purpose, or by any person other than our client, without our prior written agreement

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Appendix A Historical aerial photographs

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Figure A.1: Historical Imagery 1948. Source: Retrolens.

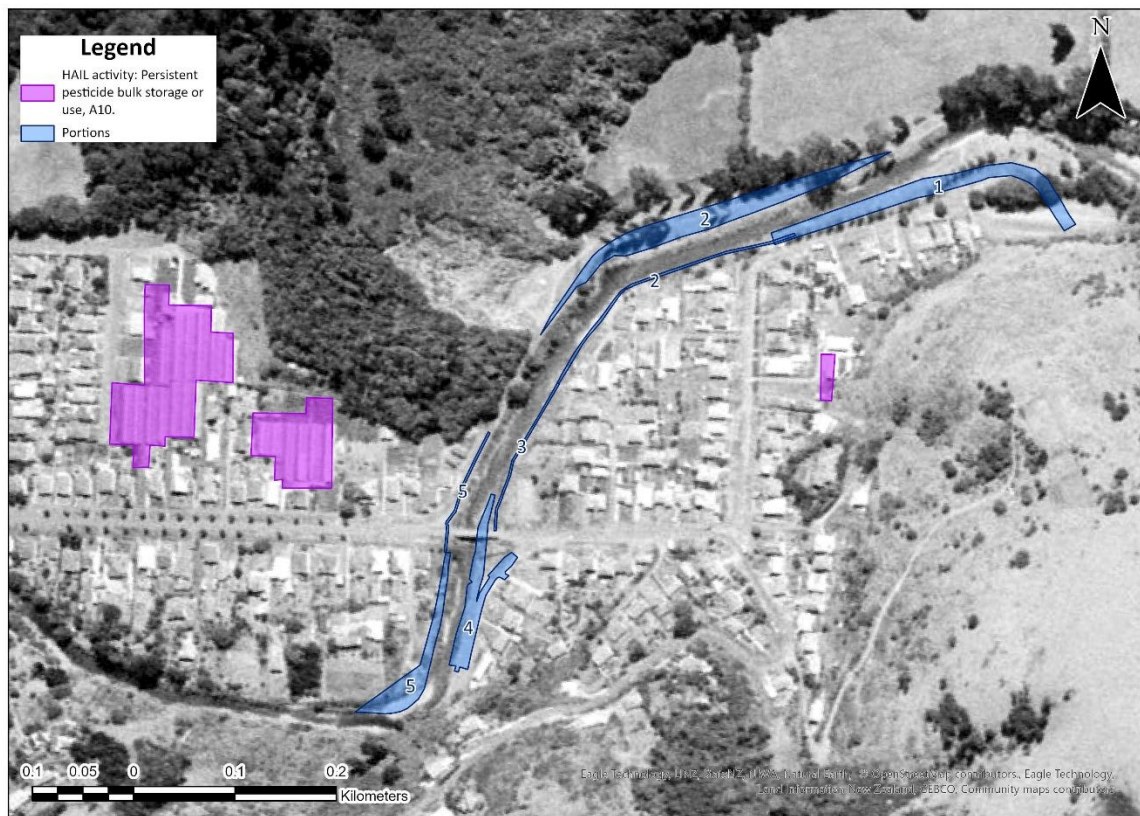


Figure A.2: Historical Imagery 1960. Source: Retrolens.



Figure A.3: Historical Imagery 1962. Source: Retrolens.



Figure A.4: Historical Imagery 1967. Source: Retrolens.



Figure A.5: Historical Imagery 1969. Source: Retrolens.



Figure A.6: Historical Imagery 1977. Source: Retrolens.

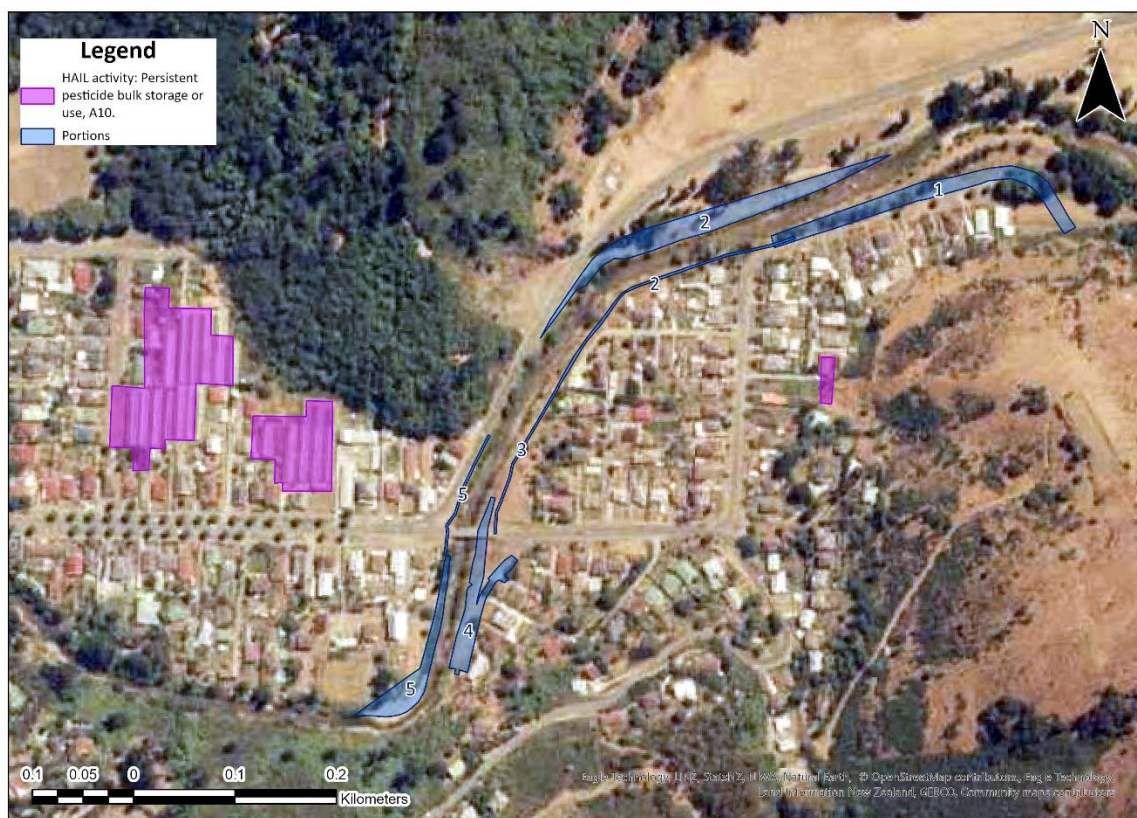


Figure A.7: Historical Imagery 1981. Source: Retrolens.



Figure A.8: Historical Imagery 1983. Source: Retrolens.

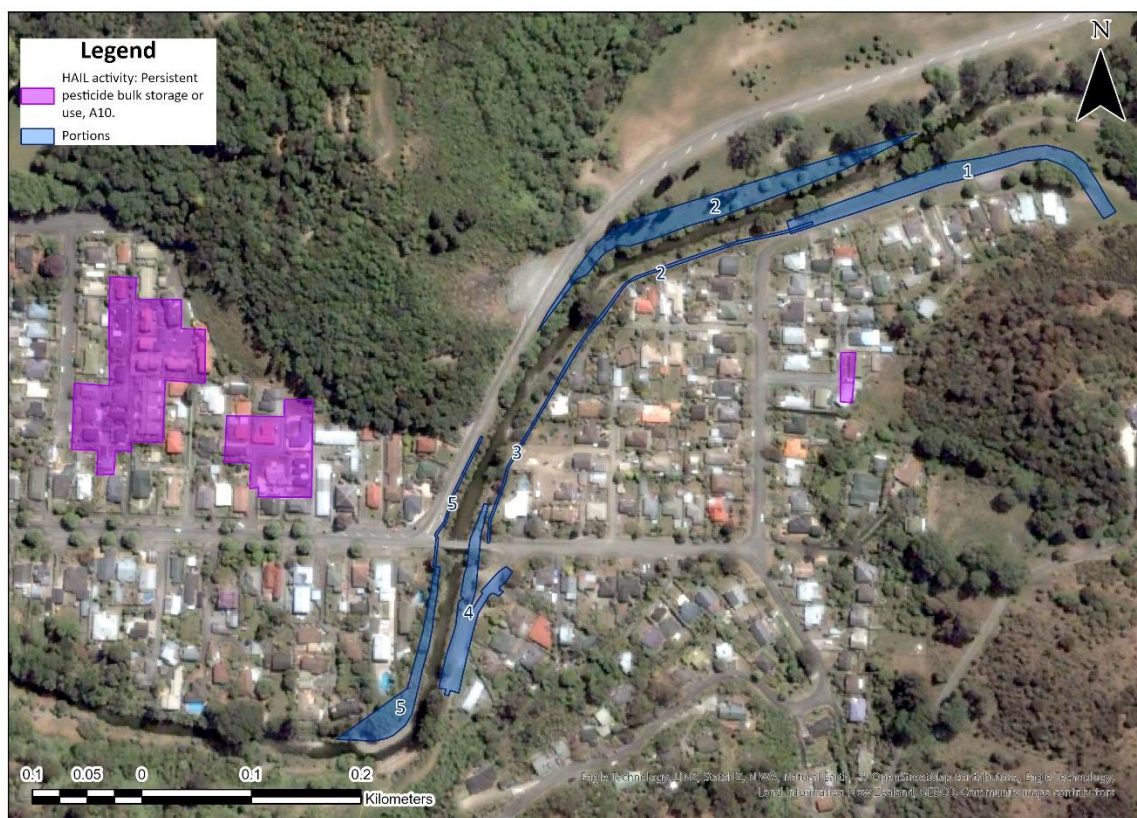


Figure A.9: Historical aerial imagery 2005. Source: Google Earth.



Figure A.10: Latest Aerial Imagery 2024. Source: Top of the South Map.

Appendix B Site walkover photographs

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Portion 1



Photograph B.1: Stopbank within Hanby Park on the true left side of the Maitai River.



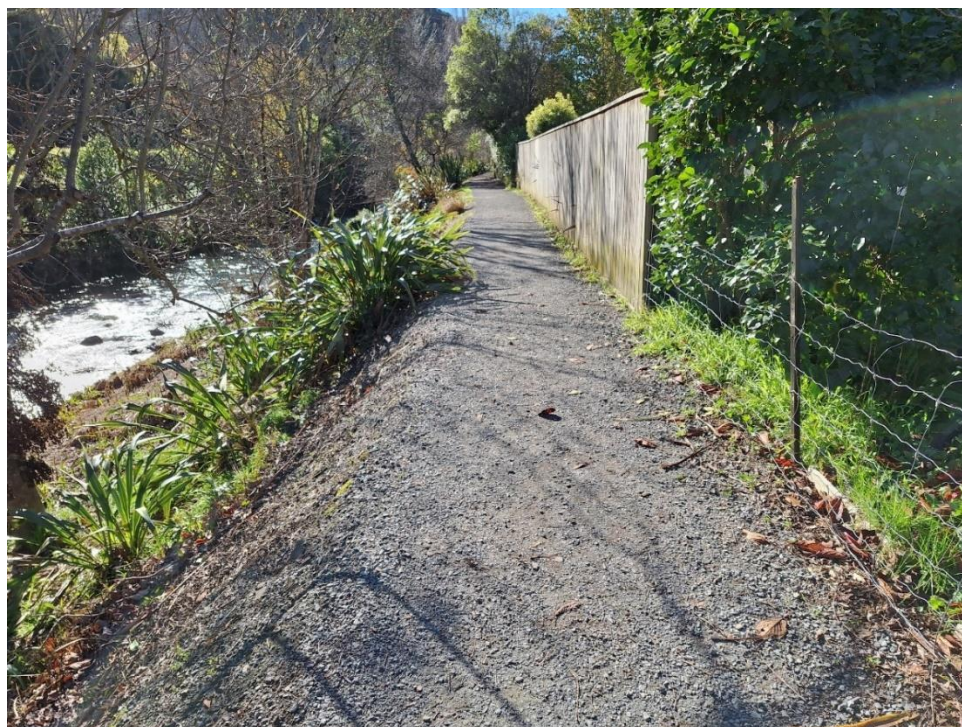
Photograph B.2: Car park area at the end of Mill Street within Hanby Park.

Portion 2

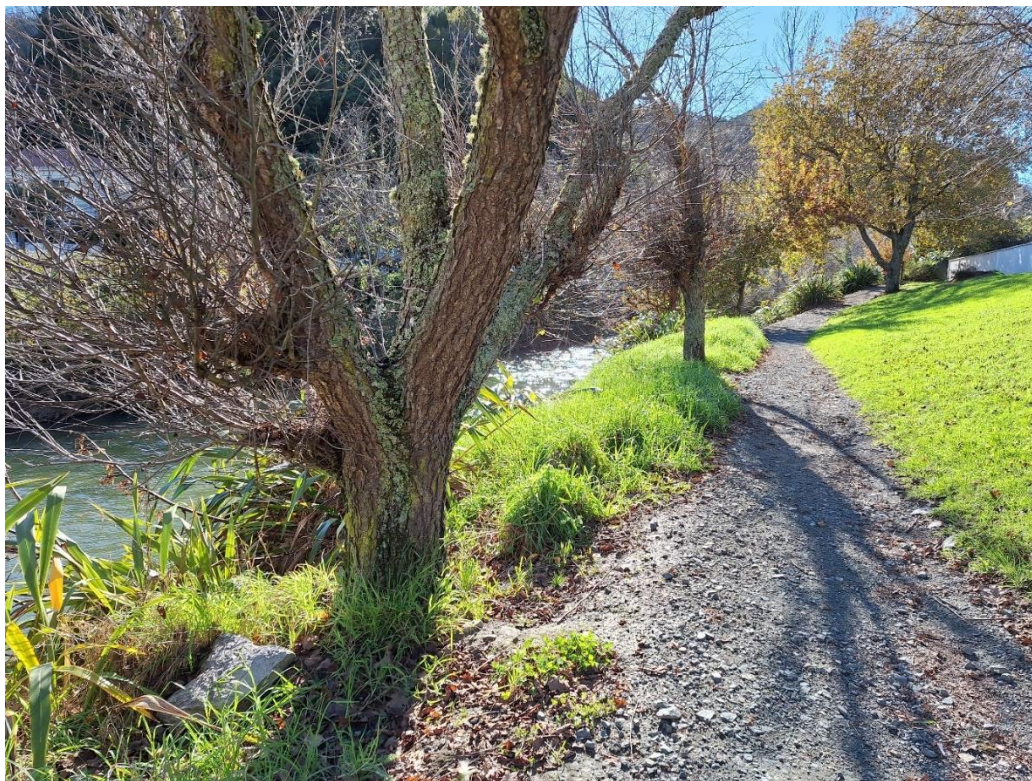


Photograph B.3: Gravel walking path on the true left site of the Maitai River.

Portion 3



Photograph B.4: Gravel path on the true left side of the Maitai river.

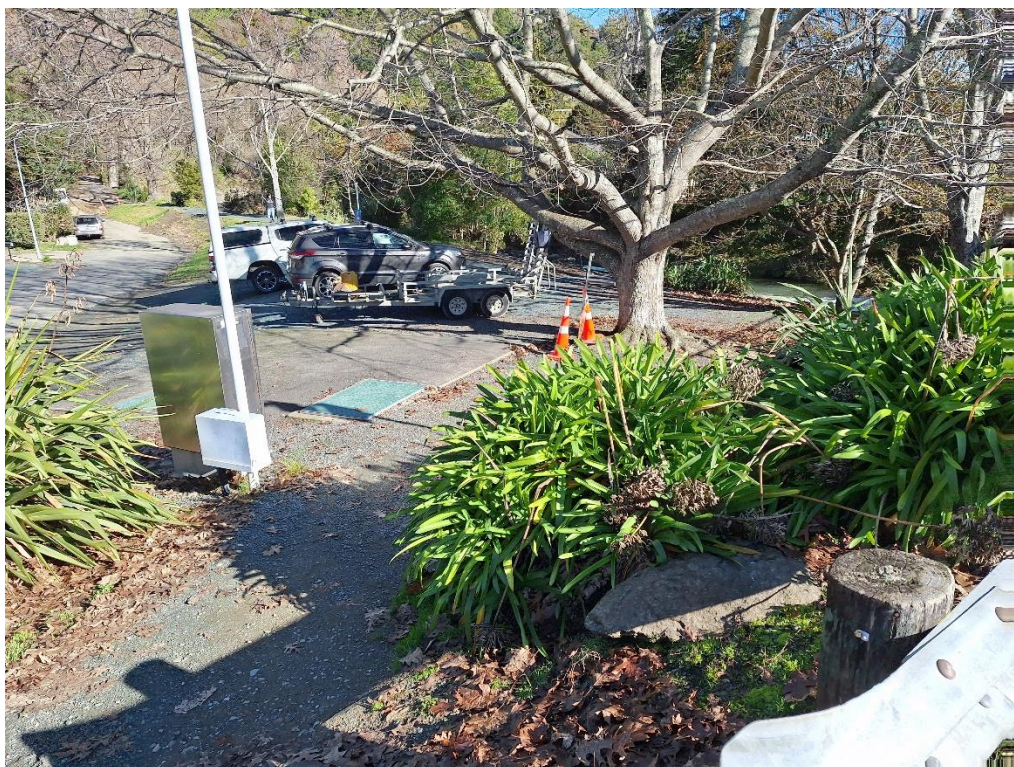


Photograph B.5: Gravel path on the true left side of the Maitai river.

Portion 4



Photograph B.6: Recently laid gravel on the gravel path which runs along the top of the stopbank of the true left side of the river. Boulder protection can be observed on the river bank.

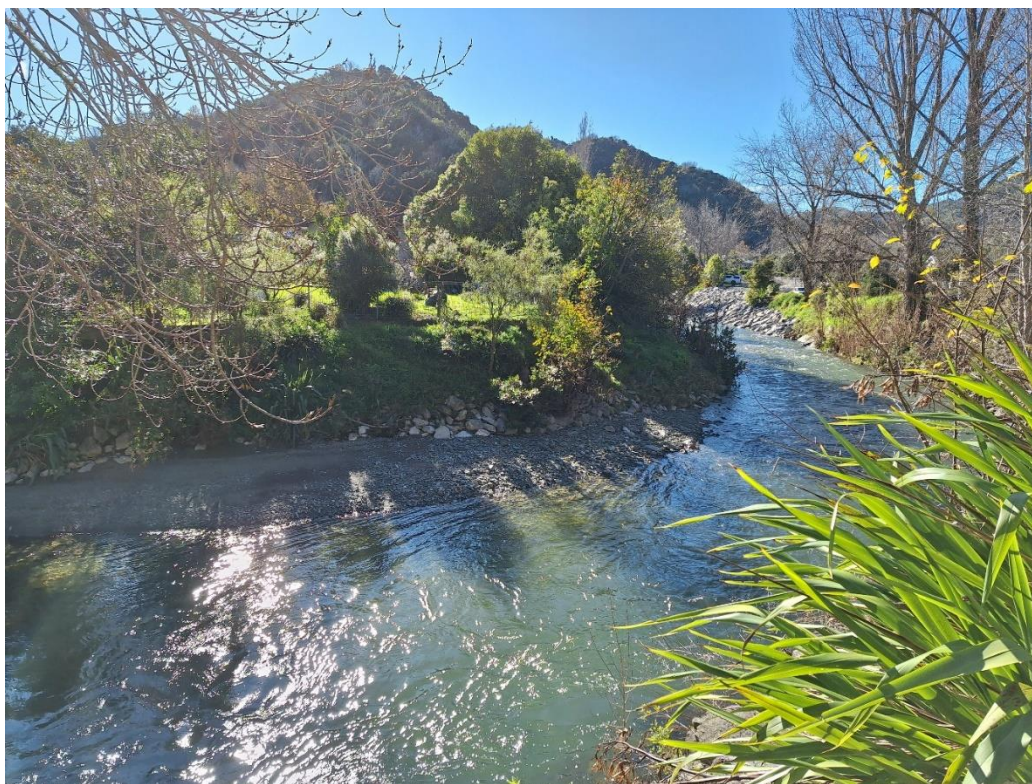


Photograph B.7: Car park area on the true left side of the stopbank, south of the Nile Street Bridge.



Photograph B.8: On the road at the end of Clouston Terrace is a pile of gravel (6m x 3m) with a small excavator sitting on top of the pile.

Portion 5



Photograph B.9: The true left banks of the Maitai river.



Photograph B.10: The true left banks of the Maitai river. Large cobbles and boulders line the banks.



Photograph B.11: The true right banks of the Maitai river and the barriers of Matai Road. A previous slip is evident and gabion baskets as scour protection can be observed.

Other observations of note



Photograph B.12: Area of visible scour on the true left side of the riverbank.



Photograph B.13: Black carbonaceous material exposed within the scour on the true left side of the river bank.



Photograph B.14: Black carbonaceous material exposed within the scour on the true left side of the river bank.



Photograph B.15: Rail material scattered on the surface of the scoured-out area.



Photograph B.16: Rammed railway irons line the river bank as scour protection.

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