

**BEFORE THE ENVIRONMENT COURT  
AT AUCKLAND  
I MUA I TE KOOTI TAIAO O AOTEAROA  
TĀMAKI MAKĀURAU**

**ENV-2020-AKL-000101**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of an appeal under clause 14(1) of Schedule 1 to the Act

**BETWEEN** **AUCKLAND / WAIKATO AND EASTERN FISH AND GAME COUNCIL**

Appellant

**AND** **WAIKATO REGIONAL COUNCIL**

Respondent

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**NOTICE OF BEEF+LAMB NEW ZEALAND LIMITED'S WISH TO BE A  
PARTY TO PROCEEDINGS  
29 September 2020**

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Solicitor: CP Thomsen / CH Luisetti

**TO:** The Registrar  
Environment Court  
Auckland

1. Beef+Lamb New Zealand Ltd (B+LNZ) wishes to be a party to the following proceedings:

*Auckland Waikato and Eastern Fish and Game Council v Waikato Regional Council*  
ENV-2020-AKL-000101

2. B+LNZ made a submission about the subject matter of the proceedings.
3. B+LNZ is not a trade competitor for the purposes of s 308C or 308A of the Resource Management Act 1991.
4. B+LNZ is interested in all of the proceedings.
5. B+LNZ is interested in the following particular issues:
  - (a) Relief sought that is inconsistent with its appeal *Beef+Lamb New Zealand v Waikato Regional Council* ENV-2020-AKL-99.
  - (b) Relief sought that seeks to amend PC1 by replacing, altering or removing the objective and policy framework and supporting rules and schedules that provide for low intensity farming.
  - (c) Relief sought that seeks introduce or re-introduce additional methods into PC1, including a values section and additional attributes.
6. B+LNZ opposes in part the relief sought because:
  - (a) B+LNZ supports the findings of the Respondent that the Decisions Version of PC1 provides for restoration and protection of the Waikato and Waipā Rivers and their tributaries, subject to the relief sought in its appeal. Subject or in addition to the specific matters pleaded below, B+LNZ opposes any other relief sought that seeks to amend the Decisions Version of PC1

- (b) B+LNZ is a farmer-owned, industry organisation that represents New Zealand's sheep and beef farmers, funded through a levy paid by all beef and sheep meat producers under the Commodity Levies Act 1990.
- (c) The relief sought by the Appellant is in parts inconsistent with the relief sought in B+LNZ's appeal. B+LNZ seek the provisions it has appealed are amended in accordance with that appeal for the reasons set out therein and to the extent the relief sought by the Appellant does not achieve that outcome it is opposed.
- (d) The relief sought by the Appellant will not provide for an appropriate regulatory framework. Any relief granted should be the most appropriate way to achieve the purpose of the Act, give effect to Te Ture Whaimana o Te Awa o Waikato / Vision and Strategy for the Waikato River, the New Zealand Coastal Policy Statement, other relevant national policy statements (notably the National Policy Statement for Freshwater Management) and Regional Policy Statement, and implement the objectives and policies of the relevant plans, including by supporting and providing for a sustainable and strong rural sector in the Waikato Region that operates while restoring and protecting the Awa.
- (e) For instance, the focus in PC1 on the four contaminants of concern is a practical approach to the management of diffuse discharges. The improvement in the four contaminants will place the region on a trajectory of change that will achieve water quality outcomes, which, in turn, will give effect to Te Ture Whaimana by recognising its vision and restoring and protecting the health and wellbeing of the Awa. B+LNZ therefore opposes the relief sought seeking to introduce uncertain references to *other contaminants* in the objectives and policies.

7. B+LNZ in part supports in principle the relief sought because:

- (a) The inclusion of additional attributes for aspects of ecosystem health (as defined in the NPSFM 2020) provides additional clarity and direction as to the management of the Awa, subject to appropriate attributes being selected.

(b) The inclusion of values in PC1 provides additional and helpful direction in the Plan, subject to appropriate values being identified and drafted.

8. B+LNZ agrees to participate in mediation or other alternative dispute resolution of the proceedings.



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CP Thomsen  
Counsel for s 274 party  
Beef+Lamb New Zealand Ltd  
29 September 2020

This notice was filed by **CHRISTOPHER PAUL THOMSEN**, solicitor for the party of the firm Fletcher Vautier Moore. The address for service of the above-named party is at the offices of Fletcher Vautier Moore, Solicitors, 265A Queen Street, Richmond, Nelson.

Documents for service on the party may be:

- (a) Posted to the solicitor at Fletcher Vautier Moore, Solicitors, P O Box 3029, Richmond, Nelson; or
- (b) Left for the solicitor at a document exchange for direction to DX WC71017, Richmond, Nelson; or
- (c) Transmitted to the solicitor by facsimile to (03) 543 8302 provided original documents are then posted to the solicitor; or
- (d) Sent by email to [cthomsen@fvm.co.nz](mailto:cthomsen@fvm.co.nz) and [cluisetti@fvm.co.nz](mailto:cluisetti@fvm.co.nz) provided original documents are then posted to the solicitor.

*Advice*

If you have any questions about this notice, contact the Environment Court in Auckland, Wellington, or Christchurch.