

**IN THE ENVIRONMENT COURT OF NEW ZEALAND
CHRISTCHURCH REGISTRY**

**I TE KŌTI TAIAO O AOTEAROA
ŌTAUTAHI ROHE**

ENV-2020-CHC-127

UNDER the Resource Management Act 1991 (RMA)

IN THE MATTER of the Water Permits Plan Change - Plan Change 7,
being part of a proposal of national significance
directed by the Minister for the Environment to be
referred to the Environment Court under section
142(2)(b) of the RMA

AND

IN THE MATTER of an application under section 149T of the RMA

OTAGO REGIONAL COUNCIL

Applicant

**MEMORANDUM ON BEHALF OF BEEF & LAMB NEW ZEALAND and
DEER INDUSTRY NEW ZEALAND**

16 MARCH 2021

Beef + Lamb New Zealand
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MAY IT PLEASE THE COURT

1. This memorandum is filed in accordance with the direction of Justice Borthwick, dated 16 March 2021 regarding supplementary evidence from expert witnesses.
2. The direction from the Court requires reasonably urgent reply, and Beef + Lamb New Zealand and Deer Industry New Zealand have not yet had an opportunity to brief expert witnesses on the recent changes and assess whether supplementary evidence will need to be filed.
3. Therefore, in an abundance of caution, Beef + Lamb New Zealand and Deer Industry New Zealand would like to advise that supplementary evidence will be filed for
 - (a) Helen Marr (planning); and
 - (b) Andrew Burt (economics); and
 - (c) Jane Chrystal (science).
4. We propose a filing date of Friday 26 March 2021 to ensure that the experts have an opportunity to properly evaluate and respond with their supplementary evidence.
5. The requested time to file reflects the importance of the proceedings, proposed changes, and the effect they could have on Deer Industry New Zealand and Beef + Lamb New Zealand's levy payers.

Signed Tuesday 16th Day of March 2021



Lauren Phillips
Environment Policy Manager – South Island
Beef + Lamb New Zealand
