

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

**ENV-2020-AKL-000089**

**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** **WAIKATO REGIONAL 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:

*Waikato Regional Council v Waikato Regional Council*  
ENV-2020-AKL-000089

2. B+LNZ made a submission about the subject matter of the proceedings.
3. B+LNZ has an interest in the proceedings that is greater than the interest that the general public has because:
  - (a) The proceedings seek relief that will impact on the natural and physical resources of the region.
  - (b) B+LNZ are a representative body that promote sustainable farming practices and develop and implement programmes aimed at improving farming systems.
  - (c) The Appeal will impact farmers who B+LNZ represent and who rely on natural and physical resources to provide for their health and well-being.
4. B+LNZ is not a trade competitor for the purposes of s 308C or 308A Resource Management Act 1991.
5. B+LNZ is interested in all of the proceedings.
6. B+LNZ is interested in the following particular issues:
  - (a) Any relief sought that is inconsistent with its appeal *Beef+Lamb New Zealand v Waikato Regional Council* ENV-2020-AKL-99.
  - (b) The effect any relief sought will have upon the objective and policy framework and supporting rules and schedules that provide for low intensity farming.

7. B+LNZ opposes the relief sought to rule 3.11.4.3 as it is unnecessary and inefficient to require independent certification of compliance with a rule.
8. B+LNZ opposes the relief sought seeking to delete the requirement for Land Use Capability (LUC) class mapping because use and identification of LUC class improves management of diffuse discharges by enhancing understanding of land characteristics in a readily auditable (by Council) way.
9. B+LNZ supports the relief sought to Schedule C (1)(b), (6) and (9) and Schedule D1 part D4(b) and D(5)(a) for the reasons set out in its appeal.
10. B+LNZ generally supports relief that seeks to improve implementation and understanding of PC1.
11. B+LNZ is otherwise neutral on the relief sought to the extent it does not substantively amend the objective and policy framework and supporting rules and schedules that provide for low intensity farming. It would otherwise oppose the relief.
12. 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.