

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

ENV-2020-AKL-000094

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 **ROYAL FOREST AND BIRD PROTECTION SOCIETY
OF NEW ZEALAND INCORPORATED**

Appellant

AND **WAIKATO REGIONAL COUNCIL**

Respondent

**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:

*Royal Forest and Bird Protection Society of New Zealand Incorporated v
Waikato Regional Council*
ENV-2020-AKL-000094

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 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) 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.
6. B+LNZ opposes 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 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) The relief sought by the Appellant is generally 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.

- (c) 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 Waikato Regional Policy Statement (Te Tauākī Kaupapa here ā-Rohe), 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 while restoring and protecting the Awa.
 - (d) PC1 enables people and communities to provide for their wellbeing while at the same time recognising the Awa are degraded and ensuring that there is no further degradation and there is a pathway for improvement in the short and long term. The relief sought fails to address those parts of Te Ture Whaimana o Te Awa o Waikato / Vision and Strategy for the Waikato River and RMA documents that provide for the former.
7. B+LNZ agrees to participate in mediation or other alternative dispute resolution of the proceedings.



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 and 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.