

BEFORE THE FRESHWATER HEARING PANEL

UNDER the Resource Management Act
1991 (the **Act**)

IN THE MATTER of an original submission on the
Freshwater Planning Instrument
part of the Proposed Regional
Policy Statement for Otago 2021
(**FPI-PRPS**)

BETWEEN **CENTRAL OTAGO**
WINEGROWERS ASSOCIATION

FPI009 and FSFPI009

AND **OTAGO REGIONAL COUNCIL**
Local Authority

**MEMORANDUM OF COUNSEL ON BEHALF OF CENTRAL OTAGO
WINEGROWERS ASSOCIATION REGARDING EVIDENCE RE-FILING**

DATED 28 JUNE 2023



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**MEMORANDUM OF COUNSEL ON BEHALF OF CENTRAL OTAGO
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1. This memorandum of counsel is filed on behalf of Central Otago Winegrowers Association (**COWA**) who lodged an original and further submission on the FPI-PRPS (FPI009).
2. This memorandum is to confirm the approach to the re-filing of a brief of evidence of Mr James Dicey who lodged evidence in the non-freshwater hearing process for OWRUG, Federated Farmers and DairyNZ.
3. The re-filed brief has taken lead from Minute 4 at paragraph [8](iii) and simply adds new sections to the previously filed evidence which are specific to water quantity and quality. The additional sections are highlighted in grey and found on pages 13 to 23.

Dated 28 June 2023



Simon Peirce

Counsel for Central Otago Winegrowers Association