

BEFORE THE FRESHWATER HEARING PANEL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the Proposed Otago Regional Policy Statement
2021 (Freshwater parts)

AND

IN THE MATTER of section 80A of the Act

AND

IN THE MATTER of the First Schedule to the Act

BY **BEEF + LAMB NEW ZEALAND LIMITED and
DEER INDUSTRY NEW ZEALAND
Submitters**

**MEMORANDUM OF COUNSEL FOR BEEF+LAMB NEW ZEALAND
LIMITED AND DEER INDUSTRY NEW ZEALAND**

18 August 2023

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MAY IT PLEASE THE PANEL

1. This memorandum of counsel is filed on behalf of Beef+Lamb New Zealand Limited (B+LNZ) and Deer Industry New Zealand (DINZ) who submitted on the Freshwater parts of the Proposed Otago Regional Policy Statement 2021.
2. We refer to the supplementary evidence of Ms Felicity Boyd in relation to the NPSIB. The purpose of this memorandum is to note that B+LNZ and DINZ do not agree with a number of the proposed amendments, however the reasons for this relate to legal issues and matters of statutory interpretation. Counsel intends to address these matters in legal submissions on 4 September 2023.



Dr RJ Somerville KC/ CH Luisetti
Counsel for Beef + Lamb NZ Limited and Deer Industry New Zealand
18 August 2023