

**IN THE ENVIRONMENT COURT  
AT CHRISTCHURCH**

**I MUA I TE KOOTI TAIAO O AOTEAROA  
ŌTAUTAHI ROHE**

**ENV-2024-CHC-29**

**IN THE MATTER**

**of an appeal under Clause  
14 of Schedule 1 of the  
Resource Management Act  
1991**

**AND IN THE MATTER**

**of the non-freshwater parts  
of the Proposed Otago  
Regional Policy Statement  
2021**

**BETWEEN**

**Oceana Gold New Zealand  
Limited  
Appellant**

**AND**

**Otago Regional Council  
Respondent**

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**NOTICE OF INTENTION BY THE ROYAL FOREST AND**

**BIRD PROTECTION SOCIETY OF NEW ZEALAND INCORPORATED**

Dated 5 June 2024

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Royal Forest and Bird Protection Society of New Zealand Inc  
Solicitor acting: May Downing  
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**To:** The Registrar  
Environment Court  
Christchurch

1. The Royal Forest and Bird Protection Society of New Zealand Incorporated (**Forest & Bird**) wishes to be a party to the following proceedings:
  - a. ENV-2024-CHC-29 *Oceana Gold New Zealand Limited v Otago Regional Council*
2. Forest & Bird made a submission and further submission on the Proposed Otago Regional Policy Statement.
3. Forest & Bird is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991.
4. Forest & Bird has an interest greater than the public generally as an incorporated society with a well-known role in the protection of indigenous biodiversity.<sup>1</sup>
5. Forest & Bird is interested in all of the proceedings.
6. Forest & Bird **opposes** the relief sought because the changes proposed are inconsistent with the Resource Management Act, do not give effect to higher order direction, and will not ensure that ecosystems are safeguarded.
7. Forest & Bird agrees to participate in mediation or other alternative dispute resolution of the proceeding.

Dated: 5 June 2024



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May Downing  
Counsel for the Royal Forest and Bird Protection Society of New Zealand Incorporated

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<sup>1</sup> See *Marlborough District Council v Burkhart Fisheries Ltd* [2018] NZEnvC 26 at [31]

**Address for Service**

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