

IN THE HIGH COURT OF NEW ZEALAND
DUNEDIN REGISTRY

I TE KŌTI MATUA O AOTEAROA
ŌTEPOTI ROHE

CIV-2024-412-000037
CIV-2024-412-000038
CIV-2024-412-000040
CIV-2024-412-000041
CIV-2024-412-000042

UNDER the Resource Management Act 1991

IN THE MATTER of appeals under Section 299 and
Clause 56 of Schedule 1 of the Act

BETWEEN KĀI TAHU

AND OTAGO FISH AND GAME COUNCIL
AND CENTRAL SOUTH ISLAND FISH
AND GAME COUNCIL

AND OCEANA GOLD (NEW ZEALAND)
LIMITED

AND QUEENSTOWN LAKES DISTRICT
COUNCIL

AND ROYAL FOREST AND BIRD
PROTECTION SOCIETY OF NEW
ZEALAND INCORPORATED

Appellants

AND OTAGO REGIONAL COUNCIL

Respondent

MEMORANDUM OF COUNSEL ON BEHALF OF MANAWA ENERGY LIMITED

Dated 13 November 2024

LARA BURKHARDT
Barrister & Solicitor

PO Box 4432
Mount Maunganui South 3149

Telephone: +64 7 575 2569
+64 27 222 8656

Email: lara@laraburkhardt.co.nz

MAY IT PLEASE COURT:

1. This memorandum is filed on behalf of Manawa Energy Limited who is an interested party to these appeals.
2. The Court has sought the position of parties on the appellants' (Fish & Game and Oceana Gold) request that their appeals be put on hold and, also, as to what should happen to Kāi Tahu's interlocutory application to join Oceana Gold's appeal, given the appellants' request.
3. In relation to the first matter, Manawa opposes the request and adopts the reasons given by the Otago Regional Council in its memorandum.
4. In relation to the second matter, Manawa does not oppose Kāi Tahu's application. Counsel agrees with Kāi Tahu that, if the application is unopposed, then the Court might deal with the matter on the papers distinct from any decision on whether the appeals be placed on hold.



Lara Burkhardt
Counsel for Manawa Energy Limited