

**BEFORE THE ENVIRONMENT COURT
AT CHRISTCHURCH**

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

ENV-2024-CHC-36

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

**Te Rūnanga o Moeraki, Kāti
Huirapa Rūnaka ki
Puketeraki, Te Rūnanga o
Ōtākou and Hokonui
Rūnanga
First Appellants**

**Te Ao Marama
Incorporated on behalf of
Waihopai Rūnaka, Te
Rūnanga o Ōraka Aparima,
and Te Rūnanga o Awarua
Second Appellants**

**Te Rūnanga o Ngāi Tahu
Third Appellants**

AND

**Otago Regional Council
Respondent**

NOTICE OF INTENTION BY THE ROYAL FOREST AND

BIRD PROTECTION SOCIETY OF NEW ZEALAND INCORPORATED

Dated 5 June 2024

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-36 *Te Rūnanga o Moerakii, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga; Te Ao Marama Incorporated on behalf of Waihopai Rūnaka, Te Rūnanga o Ōraka Aparima, and Te Rūnanga o Awarua; Te Rūnanga o Ngāi Tahu (Kāi Tahu) 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.¹
5. Forest & Bird is interested in all of the proceedings.
6. Forest & Bird **supports** the relief sought in relation to IM-O3, IM-P1, IM-P14, CE-O5, CE-P12, new policy concerning the management of discharges into the coastal environment, EIT-EN-P6, EIT-EN-P9A, and UFD-P4 as Forest & Bird agrees the changes sought by the Appellants are necessary for the PORPS to, *inter alia*:
 - a. Safeguard the life-supporting capacity of air, water, soil, and ecosystems;
 - b. Accord with the provisions of Part 2;
 - c. Give effect to relevant national policy statements; and

¹ See *Marlborough District Council v Burkhart Fisheries Ltd* [2018] NZEnvC 26 at [31].

- d. Achieve the objectives of the PORPS and/or purpose of the RMA as required by section 32 of the RMA.
7. Forest & Bird **supports in part** the relief sought in relation to IM-P10, IM-P12, EIT-INF-P12, CE-P3, and the definition of “regionally significant infrastructure” as Forest & Bird’s own appeal also seeks amendments to these provisions.
8. Forest & Bird agrees to participate in mediation or other alternative dispute resolution of the proceeding.

Dated: 5 June 2024



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Incorporated

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