

**IN THE ENVIRONMENT COURT
AT CHRISTCHURCH**

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

ENV-2024-CHC-32

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

**Manawa Energy Limited
Appellant**

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-32 *Manawa Energy 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.¹
5. Forest & Bird is interested in all of the proceedings except the relief sought in relation to EIT-EN-P7, EIT-INF-P15, and in relation to the use of the terms “energy” or “electricity” set out in paragraph 22(c) of Manawa Energy Limited’s Appeal.
6. Forest & Bird **opposes** the relief sought in relation to all parts of the appeal. The Appellant seeks changes that are not consistent with the Act, relevant national direction (such as the New Zealand Coastal Policy Statement and National Policy Statement for Freshwater Management), and will not ensure that water and ecosystems are safeguarded.
7. Forest & Bird agrees to participate in mediation or other alternative dispute resolution of the proceeding.

Dated: 5 June 2024

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



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