

**BEFORE THE ENVIRONMENT COURT
AT CHRISTCHURCH**

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

ENV-2024-CHC-38

UNDER the Resource Management Act 1991

IN THE MATTER of an appeal under clause 14 of Schedule 1 to the Act

AND of section 274 of the Act

BETWEEN **NEW ZEALAND TRANSPORT AGENCY WAKA
KOTAHI**

Appellant

AND **OTAGO REGIONAL COUNCIL**

Respondent

**NOTICE OF BEEF + LAMB NEW ZEALAND LIMITED'S WISH TO BE A
PARTY TO PROCEEDINGS
6 June 2024**

FLETCHER VAUTIER MOORE
LAWYERS
PO BOX 3029
RICHMOND 7050

Telephone: (03) 543 8301
Facsimile: (03) 543 8302
Email: cthomsen@fvm.co.nz
Email: ksimonsen@fvm.co.nz
Solicitors: CP Thomsen/KJ Simonsen

TO: The Registrar
Environment Court
Christchurch

1. Beef + Lamb New Zealand Ltd (**B+LNZ**) wishes to be a party to the following proceedings:

New Zealand Transport Agency Waka Kotahi v Otago Regional Council

2. B+LNZ made a submission about the subject matter of the proceedings.
3. B+LNZ has an interest in the proceedings that is greater than the interest that the general public has because:
 - (a) The proceedings seek relief that will impact on the natural and physical resources of the region.
 - (b) B+LNZ is a representative body that promotes sustainable farming practices and develops and implements programmes aimed at improving farming systems.
 - (c) The Appeal may impact farmers who B+LNZ represent and who rely on natural and physical resources to provide for their health and well-being.
4. B+LNZ is not a trade competitor for the purposes of ss 308C or 308A Resource Management Act 1991.
5. B+LNZ is interested in those parts of the Appeal that concern provisions of Proposed Otago Regional Policy Statement 2021 (**PORPS**) that guide and address or may guide and address pastoral agricultural land uses and integrated management, including but not limited to:
 - (a) The decision of the Respondent to adopt IM-O3;
 - (b) The proposed inclusion of a new objective IM-O5, as pleaded by the Appellant; and
 - (c) The effect any relief sought will have on the objective and policy framework that impacts pastoral farming.

6. B+LNZ provisionally opposes or is neutral on the relief sought because:
- (a) B+LNZ is an industry organisation that represents New Zealand's sheep and beef farmers, funded through a levy paid by all beef and sheep meat producers under the Commodity Levies Act 1990.
 - (b) Any relief granted should be the most appropriate way to achieve the purpose of the Act, give effect to the New Zealand Coastal Policy Statement, National Policy Statement for Freshwater Management 2020 (**NPSFM**), National Policy Statement for Indigenous Biodiversity (**NPSIB**), other relevant national policy statements and to support and provide for a sustainable and strong rural sector in the Otago Region.
 - (c) B+LNZ generally supports the findings of the Hearings Panel, which were adopted by the Respondent.
 - (d) The Decisions version of the PORPS supports and provides for planning instruments that will ensure integrated management and a sustainable and strong rural sector in the Otago region that can operate while maintaining and, where degraded, improving water quality.
 - (e) The relief sought has the potential to amend provisions that could have an impact on the ability for the PORPS to address the matters pleaded in paragraph 6(d).
 - (f) To the extent the relief sought impacts on the matters pleaded in paragraph 6(d) the relief is opposed.
 - (g) Otherwise, B+LNZ is neutral on the relief sought.
7. B+LNZ agrees to participate in mediation or other alternative dispute resolution of the proceedings.



CP Thomsen/KJ Simonsen
Counsel for s 274 party
Beef + Lamb New Zealand Ltd
6 June 2024

This notice was filed by **CHRISTOPHER PAUL THOMSEN**, solicitor for the party of the firm Fletcher Vautier Moore. The address for service of the above-named party is at the offices of Fletcher Vautier Moore, Solicitors, 265A Queen Street, Richmond, Nelson.

Documents for service on the party may be:

- (a) Sent by email to both cthomsen@fvm.co.nz and ksimonsen@fvm.co.nz;
or
- (b) Posted to the solicitor at Fletcher Vautier Moore, Solicitors, P O Box 3029, Richmond, Nelson.

Advice

If you have any questions about this notice, contact the Environment Court in Auckland, Wellington, or Christchurch.