

**BEFORE THE ENVIRONMENT COURT**  
**I MUA I TE KOOTI TAIAO O AOTEAROA**

IN THE MATTER of the Resource Management Act 1991

AND of appeals under Clause 14 of the First Schedule of the Act

BETWEEN ARATIATIA LIVESTOCK LIMITED  
(ENV-2018-CHC-29)

MERIDIAN ENERGY LIMITED  
(ENV-2018-CHC-38)

FEDERATED FARMERS OF NEW ZEALAND  
(ENV-2018-CHC-40)

TE RUNANGA O NGAI TAHU, HOKONUI  
RUNAKA, WAIHOPAI RUNAKA, TE  
RUNANGA O AWARUA & TE RUNANGA O  
ORAKA APARIMA  
(ENV-2018-CHC-47)

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**MEMORANDUM OF COUNSEL RE: REPRESENTATION, ADDRESS FOR  
SERVICE AND DIRECTIONS RE S274 NOTICES (WAI AU RIVER LIAISON  
COMMITTEE)  
7 AUGUST 2018**

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Judicial Officers: Judge Hassan and Judge Borthwick

Instructing Counsel for Appellant:  
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ROYAL FOREST AND BIRD PROTECTION  
SOCIETY OF NZ

(ENV-2018-CHC-50)

Appellants

AND

SOUTHLAND REGIONAL COUNCIL

Respondent

1. Counsel has received instructions to act for the Waiau River Liaison Committee (**the Liaison Committee**).

*Service*

2. The address for service of the Liaison Committee is 102 Jed Street Invercargill 9810. Service can also be by way of e-mail to:
  - a. [clare.lenihan@environmentallawyer.co.nz](mailto:clare.lenihan@environmentallawyer.co.nz) and [fergusmore@scholefield.co.nz](mailto:fergusmore@scholefield.co.nz); and
  - b. [Waiau.river.liaison.committee@gmail.com](mailto:Waiau.river.liaison.committee@gmail.com).

*Challenge to standing of Liaison Committee*

3. On July 13<sup>th</sup>, 2018, the Liaison Committee lodged s274 notices to the appeals of:
  - a. Meridian Energy Ltd, ENV-2018-CHC-000038;
  - b. Federated Farmers of New Zealand, ENV-2018-CHC-000040;
  - c. Royal Forest and Bird Protection Society of New Zealand Incorporated, ENV-2018-CHC-000050;
  - d. Te Runanga o Ngai Tahu ENV-2018-CHC-000047; and
  - e. Aratiatia Livestock Limited ENV-2018-CHC-000029
4. Counsel has read the Memorandum on behalf of the Respondent dated 17 July 2018, challenging the standing of the Liaison Committee (and the Waiau Rivercare Group).
5. The Liaison Committee would like to file submissions in response (and be heard, if the Court wishes to hear from parties), and seeks directions from the Court regarding:
  - a. leave to file written submissions;
  - b. the date by which any submissions need to be lodged by;
  - c. which parties need to be served with copies of the submissions (just the relevant Appellants, or all s274 parties to those appeals); and
  - d. leave to file affidavit evidence in support of the Liaison Committee's position.



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**Clare Lenihan**  
Counsel for the Liaison Committee

8 August 2018  
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