

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

ENV-2018-CHC-26 to 50

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of appeals under clause
14 of Schedule 1 to the
Act relating to the
proposed Southland
Water and Land Plan

BETWEEN **WAIHOPAI RŪNAKA,
HOKONUI RŪNAKA,
TE RŪNANGA O
AWARUA, TE
RŪNANGA O ORAKA
APARIMA, and TE
RŪNANGA O NGĀI
TAHU (collectively
NGĀ RŪNANGA)**

**Appellants in ENV-
2018-CHC-47**

AND **SOUTHLAND
REGIONAL COUNCIL**

Respondent

**MEMORANDUM OF COUNSEL FOR NGĀ RŪNANGA REGARDING
CLARIFICATION OF LINKAGES TO BE MADE IN JOINT WITNESS STATEMENT**

15 NOVEMBER 2019

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MAY IT PLEASE THE COURT

1. This memorandum of counsel is filed on behalf of Waihopai Rūnaka, Hokonui Rūnaka, Te Rūnanga o Awarua, Te Rūnanga o Oraka Aparima, and Te Rūnanga o Ngāi Tahu (collectively **Ngā Rūnanga**).

Confirmation of linkages

2. On 13 November 2019, a memorandum of counsel was filed on behalf of Southland Regional Council, and Appendix A of that memorandum sets out the agenda for the expert conferencing scheduled for 20-22 November.
3. *Linkages to cultural indicators and Ki Uta Ki Tai/Te Mana o te Wai* is an item on the agenda for the afternoon of Friday 22 November. As such, it is anticipated that these linkages will need to be included in the Joint Witness Statement that will follow the 20-22 November expert conference.
4. The cultural indicators work has been led by Ngā Rūnanga and undertaken separately from the work on ecological indicators.
5. As such, Ngā Rūnanga respectfully requests that the Court provides some clarification on whether there are expectations and/or parameters around specifically what linkages need to be made by the experts, and if so, what those expectations and/or parameters are.
6. Alternatively, if there are no expectations or parameters, Ngā Rūnanga respectfully requests that the Court confirms the experts are free to include and analyse whatever they see fit.

Filing of final report on cultural indicators of health

7. As per the outline of preliminary work programme,¹ the final report on cultural indicators of health is expected to be filed with the Court on 22 November 2019.

1 Outline was filed with the Court on 6 September as Appendix A of the Memorandum of Counsel for Ngā Rūnanga.

8. As 22 November 2019 is also the last day of the expert conferencing, and the Joint Witness Statement for this conferencing is due to be filed on 29 November 2019, Ngā Rūnanga respectfully request the leave of the Court to file the report on cultural indicators of health on 29 November 2019.

DATED this 15th day of November 2019



J G A Winchester
Counsel for Ngā Rūnanga