

**BEFORE THE ENVIRONMENT COURT
AT CHRISTCHURCH**

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

UNDER the Resource Management Act
1991

IN THE MATTER of appeals pursuant to clause 14
of the First Schedule to the Act

BETWEEN **Southland Fish and Game Council**
(ENV-2018-CHC-37)

**Royal Forest and Bird Protection
Society of New Zealand Inc**
(ENV-2018-CHC-50)

**Federated Farmers of New
Zealand**
(ENV-2018-CHC-40)

AND **Southland Regional Council**

MEMORANDUM OF COUNSEL FOR BALLANCE AGRI-NUTRIENTS LIMITED

28 JULY 2022


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MAY IT PLEASE THE COURT

1. This Memorandum of Counsel is filed on behalf of Ballance Agri-Nutrients Limited (**Ballance**) in response to the direction to circulate final wording for the proposed Southland Water and Land Plan (**SWLP**) provisions.¹
2. Ballance filed a Memorandum of Counsel dated 13 July 2022 setting out its final wording and as it is not seeking any further relief, it did not file a further memorandum yesterday.
3. However, counsel considers it would be helpful to clarify that matter by way of this Memorandum of Counsel, and also to note that Ballance has no opposition to the relief agreed to in the Joint Witness Statement dated 25 July 2022.

DATED this 28th day of July 2022



Megan Exton

Counsel for Ballance Agri-Nutrients Limited

¹ Minutes of the Environment Court dated 11 July 2022 and 15 July 2022.