

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

**AT CHRISTCHURCH  
KI ŌTAUTAHI**

**IN THE MATTER** of the Resource Management Act 1991

**AND** of appeals under clause 14 of the First Schedule of the Act

**BETWEEN** **TRANSPower NEW ZEALAND LTD**  
**(ENV-2016-CHC-26)**  
Appellant

**FONterra CO-OPERATIVE GROUP LTD**  
**(ENV-2018-CHC-27)**  
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**AND** **SOUTHLAND REGIONAL COUNCIL**  
Respondent

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**Memorandum for the Director-General of Conservation Tumuaki Ahurei**  
**Re Court's Directions dated 11 July 2023 and**  
**Request to be Excused from Resumed Hearing**  
Dated 17 July 2023

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**Department of Conservation**  
Planning, Permissions and Land  
RMA Shared Services  
Private Bag 4715  
Christchurch 8140  
Phone Waea: 027 408 3324  
Solicitor Rōia: Pene Williams

**BETWEEN**

**ARATIATIA LIVESTOCK LTD**

(ENV-2018-CHC-29)

**WILKINS FARMING CO**

(ENV-2018-CHC-30)

**GORE AND SOUTHLAND DISTRICT COUNCILS,**

**INVERCARGILL CITY COUNCIL**

(ENV-2018-CHC-31)

**DAIRYNZ LTD**

(ENV-2018-CHC-32)

**H W RICHARDSON GROUP LTD**

(ENV-2018-CHC-33)

**BEEF + LAMB NEW ZEALAND**

(ENV-2018-CHC-34 AND 35)

**DIRECTOR-GENERAL OF CONSERVATION**

(ENV-2018-CHC-36)

**SOUTHLAND FISH & GAME COUNCIL**

(ENV-2018-CHC-37)

**MERIDIAN ENERGY LTD**

(ENV-2018-CHC-38)

**FEDERATED FARMERS OF NEW ZEALAND**

(ENV-2018-CHC-40)

**SOUTHWOOD EXPORT LTD, SOUTHLAND PLANTATION FOREST**

**COMPANY OF NZ**

(ENV-2018-CHC-46)

**TE RUNANGA O NGAI TAHU, HOKONUI RUNAKA, WAIHOPAI**

**RUNAKA, TE RUNANGA O AWARUA AND TE RUNANGA O**

**ORAKA APARIMA**

(ENV-2018-CHC-47)

**RAYONIER NEW ZEALAND LTD**

(ENV-2018-CHC-49)

**ROYAL FOREST AND BIRD PROTECTION SOCIETY OF NZ INC**

(ENV-2018-CHC-50)

Appellants

**May it please the Court,**

The following matters are respectfully submitted for the Director-General of Conservation Tumuaki Ahurei (the Director-General):

1. This memorandum responds to the Court's Minute dated 11 July 2023 addressing the supplementary evidence of Dr Snelder and the Freshwater Farm Plan Regulations. I apologise for not responding by 14 July 2023 as directed in the Minute, I was on leave from 11 July – 14 July inclusive.
2. I advise the Director-General does not seek to cross-examine Dr Snelder, nor does she oppose the production of Dr Snelder's further supplementary evidence by way of affidavit.
3. If the Court considers a resumed hearing on Dr Snelder's evidence is still required on either 9 August 2023 or 22 August 2023, I seek leave to be excused from the hearing. The Director-General will abide the Court's decisions in respect of Dr Snelder's evidence and which maps are included in Schedule X.



P D Williams  
Counsel Rōia for the Director-General