

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

UNDER the Resource Management Act
1991

IN THE MATTER 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)

(Continued next page)

**MEMORANDUM OF COUNSEL FOR WAI AU
RIVERCARE GROUP INCORPORATED REGARDING
WORDING SUPPORTED**

Judicial Officer: Judge Borthwick

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

**ROYAL FOREST AND BIRD
PROTECTION SOCIETY OF NZ
(ENV-2018-CHC-50)**

Appellants

AND

**SOUTHLAND
COUNCIL**

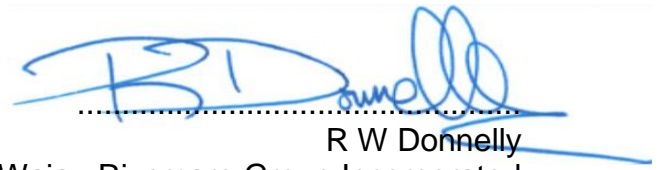
**REGIONAL
COUNCIL**

Respondent

MAY IT PLEASE THE COURT:

1. Further to the Court's Minute dated 22 November 2022, the Waiiau Rivercare Group Incorporated seeks a discretionary rule classification and supports the wording of the provisions as detailed in the memorandum filed on behalf of Aratiatia Livestock Limited.

DATED at Invercargill this 9th day of December 2022



R W Donnelly

Counsel for Waiiau Rivercare Group Incorporated