

**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)
	Federated Farmers of New Zealand (ENV-2018-CHC-40)
	Royal Forest and Bird Protection Society of New Zealand Inc (ENV-2018-CHC-50)
AND	Southland Regional Council

MEMORANDUM OF COUNSEL FOR BALLANCE AGRI-NUTRIENTS LIMITED
AS TO WITHDRAWAL – 12 SEPTEMBER 2023



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MAY IT PLEASE THE COURT:

1. On 22 June 2018 Ballance Agri-Nutrients Limited (**Ballance**) filed s 274 notices to join the following appeals:
 - (a) ENV-2018-CHC-37 – Southland Fish and Game Council v Southland Regional Council.
 - (b) ENV-2018-CHC-40 – Federated Farmers of New Zealand v Southland Regional Council.
 - (c) ENV-2018-CHC-50 – Royal Forest and Bird Protection Society of New Zealand Inc v Southland Regional Council.
2. Ballance has considered its position and has decided to no longer pursue its interests in these appeals.
3. Accordingly, Ballance respectfully requests the Court grant it leave to withdraw its s 274 interest in these appeals.

DATED this 12th day of September 2023



Vanessa Hamm

Counsel for Ballance Agri-Nutrients Limited