

**I MUA I TE KOOTI TAIAO  
I ŌTAUTAHI ROHE**

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

**A N D**

**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**  
(ENV-2018-CHC-50)

**Appellants**

**A N D** **SOUTHLAND REGIONAL COUNCIL**  
**Respondent**

---

**MEMORANDUM ON BEHALF OF RAVENSDOWN LIMITED REGARDING  
FINAL WORDING FOR PROVISIONS**

**12 JULY 2022**

---

**NATURAL RESOURCES LAW LIMITED**

Solicitor: M R Christensen  
(mark@naturalresourceslaw.co.nz)

PO Box 6643  
Upper Riccarton  
CHRISTCHURCH 8442

Tel 0274 878611

**MAY IT PLEASE THE COURT:**

1. The Court, in the case management memorandum dated 11 July 2022, instructed parties to provide their final wording of provisions by 13 July 2022. This memorandum responds to the Court's direction.
2. Ravensdown is a party to Policies 15A, 15B and 16, Rule 20 and Appendix N. The final wording of these provisions sought by Ravensdown, except for the following addition to Appendix N arising from Ms Taylor's oral evidence on 7 July 2022, is accurately recorded in the Consolidated Plan (as at 7 June 2022).

**Appendix N – Part B – New Clause (8)**

3. Ms Taylor, during her oral evidence, proposed the inclusion of a new point (8) in Part B of Appendix N. The proposed addition sought by Ravensdown is:

8. The FEMP must describe how the practices, actions and mitigations identified in the FEMP contribute to giving effect to the FEMP Purpose Statement.

**DATE: 12 July 2022**



---

Mark Christensen  
Counsel for Ravensdown Limited