

**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

17 November 2021


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MAY IT PLEASE THE COURT

1. This Memorandum of Counsel is filed on behalf of Ballance Agri-Nutrients Limited (**Ballance**) regarding its expert witnesses.
2. Ballance has s 274 interests in the proposed Southland Water and Land Plan (**SWLP**) appeals, including in Topic B5.
3. Due to pre-existing work commitments and a heavy workload, Ballance will no longer call the following expert witnesses in the SWLP proceedings, including in relation to the upcoming expert conferencing:
 - (a) Jim Risk (farm systems and science/water quality).
 - (b) Sara Elmes (farm systems).
4. Ballance continues to call Sue Ruston (planning).

DATED this 17th day of November 2021



Megan Exton
Counsel for Ballance Agri-Nutrients Limited