

**IN THE ENVIRONMENT COURT  
AT CHRISTCHURCH  
I TE KŌTI TAIAO O AOTEAROA  
KI ŌTAUTAHI**

IN THE MATTER of the Resource Management Act 1991

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

BETWEEN ARATIATIA LIVESTOCK  
LIMITED

(ENV-2018-CHC-29)

(and all other appellants listed in  
the Schedule attached)

Appellants

AND SOUTHLAND REGIONAL  
COUNCIL

Respondent

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**MINUTE OF THE ENVIRONMENT COURT**

**Consent documentation  
(10 March 2022)**

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[1] The following observations and questions provide counsel and witnesses with an indication of matters the court will request assistance with at the all of parties hearing commencing 14 March 2022.

[2] We regret that we were not able to release the Minute earlier. The proposed plan is complex and unlike the parties, the court is not familiar with its contents. Given this, it is possible that we have not apprehended correctly what is being said and proposed.



[3] As you will see, we have questions in relation to the phrase ‘avoid, where reasonably practicable, or otherwise remedying or mitigating’ phrase. We wonder whether this phrase can be employed to implement directive objectives, particularly in the context of new consents (i.e. consents that are not replacement consents). We use Objective 6 as a touchstone when thinking about implementation, although in practice more objectives would likely apply when considering a consent application.

[4] By way of a general comment we would not refer to the NPS-FM 2020 to justify the amendments proposed if this cannot be substantiated. This would create a precedent which the Regional Council and parties will find unhelpful going into a full review of the proposed plan and (we understand) the Regional Policy Statement.

[5] Counsel are to assist the court by addressing how, and under what statutory provision(s), the court is to make its decision. Given that most objectives are now decided, s 67(1) may be of greater moment than s 67(3).

### **Context**

[6] In many places, the NPS-FM employs the term ‘practicable’ not ‘reasonably practicable’.<sup>1</sup>

[7] The agreed physiographic zones policies, Policies 4-12A,<sup>2</sup> when addressing risk uses the phrase ‘avoid, as a first priority ... and where avoidance is impractical, requires risk ... be minimised’.<sup>3</sup>

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<sup>1</sup> For example, see NPS-FM 2020, Policy 7 for example and the effects management hierarchy at 3.21.

<sup>2</sup> *Aratiatia Livestock Ltd and Others v Southland Regional Council* [2020] NZEnvC 110.

<sup>3</sup> Proposed by the parties as set out in SRC memorandum dated 4 August 2021 and then in court’s Minute dated 1 October 2021.

[8] For discharge permits, Policy A4<sup>4</sup> enquires into the ‘extent to which it is feasible and dependable’ that adverse effects on certain values are avoided.

### **General interpretational questions**

[9] Legal – what does ‘reasonably practicable’ mean and secondly, is there more than one standpoint from which ‘reasonably practicable’ is to be assessed? Subject to the provisions that the phrase appears, does the meaning of the phrase change?

[10] Legal – do any issues as to interpretation arise from the use of the different phrases at paragraphs [6]-[8] above in the same or different planning instruments?<sup>5</sup>

[11] Legal – if the purpose of the amendment is to put greater emphasis on the duty to avoid adverse effects in the first instance (before considering whether they can be remedied or mitigated) is this made clearer by saying ‘avoid, where reasonably practicable’ and make no reference to mitigate or remedy?

[12] Does the term ‘reasonably’ qualify the outcomes in Objective 18 that ‘All persons implement environmental practices...’.

### **Specific issues of interpretation and clarification**

#### ***Topic B1 – Water takes***

##### *Policy 20 – management of water resources*

[13] The deponent Ms Maciaszek supports the inclusion of the phrase ‘where reasonably practicable’ because the amendment is consistent:

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<sup>4</sup> The proposed plan was amended by including Policy A4 of the NPS-FM 2014 (as amended 2017).

<sup>5</sup> ‘Practicable’ and ‘avoid, as a first priority ... and where avoidance is impractical, require risk ... be minimised’ and the extent to which avoidance is ‘feasible and dependable’.

- (a) with amendments proposed for other policies;
- (b) with the hierarchy of NPS-FM, Te Mana o te Wai; and
- (c) better prioritises the health of the waterbody and ecosystems.

[14] The purpose of the change is to place greater emphasis on the duty to avoid adverse effects in the first instance, before considering whether they can be remedied or mitigated.<sup>6</sup> The deponent cross-references the reasons given by Mr M McCallum-Clark in his affidavit filed in support of Topic B2, Policies 15A and 15B, although he does not amplify upon what is said above.

*Scenario the proposal<sup>7</sup> will have an adverse effect on the quality and quantity of aquatic habitat (Policy 20(1)(a))*

[15] The NPS-FM's single objective is given effect to by, amongst other policies, NPS-FM Policy 9 that '[t]he habitats of indigenous freshwater species are **protected**'.

[16] pSWLP, Objective 9/9A(a) is to **safeguard** the life-supporting capacity and aquatic ecosystem health and Policy 20 is to 'avoid where reasonably practicable, or otherwise remedy or mitigate' ... (1)(a) 'the quality and quantity of aquatic habitat...'.<sup>8</sup>

[17] Legal and planning – under the proposed *remedy* or *mitigate* actions is something less than protection or safeguarding a possible outcome and if so, would that implement the objectives?

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<sup>6</sup> Affidavit of L R Maciaszek affirmed 2 February 2022 at paragraph [20] Policies 15A, 15B and 17A adopt this language.

<sup>7</sup> Proposal being an application for resource consent.

<sup>8</sup> We assume Policy 20's 'aquatic health' aligns with NPS-FM, Objective 1(a) and Policy 9, Appendix 1A – Compulsory Values, Ecosystem Health.

*Scenario: if the proposal<sup>9</sup> will have an adverse effect on the quality and quantity of aquatic habitat (Policy 20(1)(a)) and will have an adverse effect on recreational values and historic heritage values (Policy 20(1)(d) and (e))<sup>10</sup>*

[18] Planning – does the deponent agree that there is no express priority between sub-parts 1A, 1, 2 and 3 of Policy 20 and that their order does not reflect the hierarchy of Te Mana o te Wai obligations?

[19] Planning – how might, for example, competing priorities be determined both between 1A and 2 and between the nine limbs of 2 where the reliability of supply for surface water users is to be considered together with ecosystem health, natural character values, recreation values and cultural matters?

[20] Legal and planning – assuming that the adverse effects cannot all be avoided, does the NPS-FM objective and the pSWLP’s objectives justify greater weight being given to measures to secure outcomes for aquatic habitats than to measures to secure outcomes for recreational values or heritage value or natural character?

[21] Legal and planning – by requiring all effects to be ‘avoided where reasonably practicable’, does this risk applicants for resource consent conflating the hierarchy of obligations and argue ‘everything is of equal importance’?<sup>11</sup>

[22] Legal and planning – Policy 25, as proposed to be amended by the parties, expressly recognises a hierarchy of demands for water at times of shortage. Citing the hierarchy of priorities of Te Mana o te Wai,<sup>12</sup> perishable primary produce is

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<sup>9</sup> Proposal being an application for resource consent.

<sup>10</sup> To illustrate these matters one might take a scenario where with Objectives 1, and 6 in mind, and potentially others, the Regional Council is presented with a proposal to replace a water permit to take water for productive purposes from a degraded waterbody with relatively poor aquatic habitat(s), high cultural, natural character and recreational values.

<sup>11</sup> NPS-FM, cl 1.3 (5) Fundamental Concept – Te Mana o te Wai and the Objective or NPS-FM, Objective.

<sup>12</sup> L R Maciaszek affidavit ‘Topic B’ affirmed 2 February 2022.

relegated. Is their scope for the same approach for second and third tier priorities being addressed in Policy 20 and if so, is there support for the amendment under s 32AA?

[23] Note: the same issue may arise in Policy 24 – water abstraction for community water supply; and Policy 28 – structures and bed disturbance activities of rivers and lake.

## **Policies 17 and 17A**

### *Interpretation and clarification*

[24] Legal and planning – with the outcomes already stated in the objectives, does the phrase ‘avoid, where reasonably practicable, or otherwise remedy or mitigate’ implement how the objectives are to be achieved or does the phrase have the capacity for the outcomes to be read down or obfuscated?

[25] Planning – how are these provisions to be applied together with Policy A4.? Note – the same application question likely arises with other discharge policies.

*Scenario: quality of fresh water is degraded by human activities in the locality of a proposed new agricultural effluent management system or community sewerage schemes/wastewater schemes<sup>13</sup>*

[26] Legal and planning – for agricultural effluent management systems,<sup>14</sup> how would the phrase ‘avoid, where reasonably practicable, or otherwise remedy or mitigate’ be interpreted and applied to achieve the outcome in Objective 6 – water quality is to be improved where degraded by human activities?

[27] Would compliance with the best practice guidelines cited in the Policy 17 Notes, in conjunction with the two matters to be avoided in Policy 17(1)(c) and

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<sup>13</sup> The same issues arise for community sewerage schemes and on-site wastewater systems under Policy 17A.

<sup>14</sup> New system meaning not a replacement system(s).

(d), enable any adverse effects to be avoided?

[28] Planning and technical – where degraded, would water quality only be improved if **new** systems (discharging to the environment) were avoided **and** existing systems<sup>15</sup> reduced contaminant load discharged to the environment? Put another way, do you agree that the policy could maintain the degraded state of water but not necessarily improve?

[29] Planning – with regards to community sewerage schemes, identify the rule that deals specifically with the discharge of treated wastewater to water.

[30] Planning – taken by themselves would the measures in Rule 32B (construction, maintenance and use of new agricultural effluent storage facilities) avoid adverse effects on water quality?

[31] Planning – should the title to Rules 32B and 32D read ‘agricultural effluent management system’ or ‘agricultural effluent storage facilities’?

[32] Planning – what policies are implemented by Rule 32C?

[33] Planning – would a community sewerage scheme come within the definition of a non-agricultural effluent storage facility?

**Topic B1, Issues 1, 4, 5, 10, 13, 16 and 17 relating to Policies 20 and 25, Rules 49 and 54, Appendix K and L.5**

***Policy 25 – Priority takes***

[34] The policy lists first and second order priorities that the Council will apply when issuing a water shortage direction. The deponent at paragraph [35] of her affidavit states that “The agreed wording **does not preclude** the health and well-

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<sup>15</sup> At the time a replacement consent is sought.

being of water bodies and freshwater ecosystems from being prioritised above all uses described in the Policy when the Policy is applied'. The court would be assisted by understanding what plan provisions lead the deponent to that opinion.

### ***Appendix K***

[35] Legal and planning – is the targeted management of a single species consistent with pSWLP's Objective 1 and NPS-FM's Objective 1, Policies 16 and 17 together with the cl 3.5, Integrated Management and the principles of ki uta ki tai required by Te Mana o te Wai.

[36] Technical (Mr Moss) we are unclear how Appendix K, Steps 1-3 in conjunction with the amended Table are intended to operate where both galaxiid and trout are listed in the same management unit, albeit at different median flows.

### ***Appendix L.5 – Te Anau groundwater***

[37] Requires technical evidence in support.

## **Topic B2**

### ***Policy 15A – Maintain water quality where standards are met***

[38] Legal – can the policy be interpreted such that where existing water quality/bed sediments exceed the relevant Standards, the policy may enable through the 'mitigating' route a diminution in quality to the minimum Standards.

[39] Legal and planning are to consider the above interpretative path and whether amended Policy 15A is the most appropriate way to achieve Objective 6.

### ***Policy 15B – Improving water quality where standards are not met***

[40] Policy 15B applies where water quality standards are **not** met. Preamble to the policy states: '**improve water quality** by: ... (1, 1a and 2)'. It is unclear



whether/how the policy to improve water quality is implemented in (1-2).

[41] Policies (1) and (1a) can be read two ways:

- (a) water quality is to be improved; or
- (b) any increase [in contaminants] that would further degrade water quality is to be avoided, remedied or mitigated but that water quality overall need not be improved.

[42] Legal and Planning – If the latter is intended, does this implement Objective 6(b)? Secondly, could improvement in water quality on replacement of consents be reduced/frustrated by the granting of new consent(s)?

[43] Planning – Policy 15B(1) applies to point source discharges. What activities are caught by Policy 15B (1a)?

[44] Planning – is Policy 15B(2) intended to apply to all discharges (diffuse and point source)?

[45] Mr McCallum-Clark is to elaborate on his statement at paragraph [42] of his affidavit that “...*there may be greater uncertainty around expectations* [between applicant/consent authority/3<sup>rd</sup> parties?] *as the BPO may not be the automatic response* [despite being required in the P16A chapeau]”.

### **Policy 16A – Industrial and trade processes that may affect water quality**

[46] The core reasons for amending this policy are:<sup>16</sup>

- (a) it places the policy in the context of, and servient to, Policies 15A and B;
- (b) it provides greater detail as to how BPO is to be achieved; and

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<sup>16</sup> M McCallum-Clark, affidavit ‘Topic B2’ affirmed 2 February 2022 at [40].

- (c) sets a different and higher standard for new discharges.

[47] Planning – expand on the statement at [42]<sup>17</sup> that there may be greater uncertainty around expectations, as BPO may not be the automatic response.

[48] Planning – was any consideration given to simply applying BPO to new and replacement consents for industrial and trade processes e.g. Policy 16A to read

*Pursuant to Policies 15A and 15B require the adoption of the best practicable option to manage the treatment and discharge of contaminant from trade and industrial processes?*

*The adverse effects to be managed include effects on the quality of water in lakes, rivers, artificial watercourses, modified watercourses, wetlands, tidal estuaries, salt marshes and groundwater.’*

[49] Planning – given Objective 6, for Policies 15A and 15B, should there be an unequivocal requirement in the Policy to maintain water quality where not degraded and to improve water quality where it is degraded, including (positively) by adoption of the BPO?

[50] Planning – Policy 16A is subservient to Policies 15A and B:

- (a) where water quality standards are currently met, Policy 15A applies to all discharge consents (new and replacement consents);
- (b) Policy 16A applies to a subset of discharge consents, namely consents for industrial and trade processes;
- (c) in contrast with Policy 15A, Policy 16A distinguishes between new and replacement consents;
- (d) for new industrial or trade processes, Policy 16A(a) is to avoid where ‘practicable’, but Policy 15A is to avoid where ‘reasonably practicable’.

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<sup>17</sup> M McCallum-Clark, affidavit ‘Topic B2’ affirmed 2 February 2022 at [42].

Is the difference in terms deliberate?

- (e) for **new** industrial and trade process, where water quality standards are **not** met Policy 15B(1)<sup>18</sup> applies and the effects of the activity are **not** to exacerbate the exceedance of the standards. Under 16A(a) are the same effects avoided (where reasonably practical), remedied or mitigated. Presumably this is with the same outcome in mind – the exceedances of the standards are not exacerbated but water quality not necessarily improved?
- (f) for a **replacement** permit, explain how the Policy 16A(b) is implemented when water quality standards are exceeded, if:
  - (i) Policy 15B(2) is to improve<sup>19</sup> water quality by demonstrating adverse effects are to be avoided, where reasonably practicable, or otherwise remedy or mitigate any adverse effects, but Policy 16A(b) talks about minimising adverse effects. Is ‘minimise’ a higher or lesser standard than ‘avoid where reasonably practicable, remedy or mitigate’? The terms need to be explained;
  - (ii) again, do replacement consents in Policy 16A(b) for new industrial and trade processes need to improve degraded water?

## Rule 9

[51] If the amendment is intended to give effect to the Hazardous Substances and New Organisms Act, might (i) be better reworded to read “... *rate necessary as approved by the EPA, or absent an EPA approval, as recommended by the manufacturer*”.

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<sup>18</sup> Assuming point source discharges are proposed.

<sup>19</sup> Note : it is unclear that ‘improvement’ in water quality is actually an outcome under the Policy 15B.

**Rule 13 – Discharge from subsurface drainage systems<sup>20</sup>**

[52] Planning – are the extensive Southland sub-surface drainage systems contained within separate properties and, if they are not, what practical implications if any does this have for plan administration in terms of the Regional Council or landowners knowing the source of the discharge?

[53] Planning – Rule 13(2) – what baseline data exists to assess a 10% change in receiving water sediment cover against? As with Appendix E, is the upstream environment the relevant baseline?

[54] Planning – should the reference in Rule 13(2) be to ‘fine’ sediment to align with the Appendix E wording?

***Rule 15***

[55] Planning – we would be assisted by a clearer explanation in paragraph [89] as to NES Regs. Is the deponent saying that the rules in the plan are lessor standard than new NES Regs 46, 47 and (I think) 54 but that there is no scope to apply the regulations on appeal?

[56] Planning – confirm whether the intent here is to align the standards at Rule 15(a)(iv) with those in Appendix E?

[57] Planning – should Rule 15(a)(iv)(4) for lowland soft bed waterbodies be aligned with the 33% metric in Appendix E for the corresponding body?

**Appendix E**

[58] Planning and Dr Hodson will address the court on how the standards for

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<sup>20</sup> A permitted activity.

water clarity and colour are to be applied:

- (a) produce a copy of the 1994 MfE guidelines;
- (b) confirm whether the scientific justification in 1994 MfE guidelines is unchanged?
- (c) clarify what is the baseline environment against which the stated increase in **sediment** is to be measured?
  - (i) will existing baseline data be required to accompany resource consent applications?
  - (ii) for enforcement purposes, absent baseline data, what information would be used?
  - (iii) does the Appendix apply only in the context of a resource consent?
- (d) what effects, if any, arise from a standard that permits the cumulative increase in sediments (i.e. in increments of 10%)?
- (e) is the baseline environment against which to measure **change in water clarity**, the clarity/colour upstream of the discharge point?
- (f) do the 1994 MfE guidelines address the types of surface water bodies identified in Appendix E ie lowland hard bed, hill etc?
- (g) the recommended reduction in water clarity “depending on onsite conditions” – are those onsite conditions accounted for in Appendix E.

### ***Rule 33 Discharge to land***

[59] Legal – the deponent appears to say that the inclusion of a date enables existing schemes within certain setbacks to continue to operate without major modification under a discretionary activity framework.<sup>21</sup> If that is what is intended, is this correct in law – would not the discharge from existing schemes (constructed before 1 January 2017) now require a discharge permit under Rule 33(aa)? The

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<sup>21</sup> M McCallum-Clark, affidavit ‘Topic B2’ dated 3 February 2022 at [76].

activity is discretionary and would be assessed under the objectives and policies?

[60] Planning – we are not told how many existing schemes there are in the Region. There is no evident rationale for the 2017 date or why schemes constructed prior to it are not subject to qualifying standards. The deponent will explain the rationale behind the rule’s proposed structure and dates.

[61] Planning – biosolids is not defined in the pSWLP Glossary or RMA. Does the term “biosolids” require definition?

***Rule 33A Community sewerage scheme/wastewater***

[62] At paragraph [77] is the deponent saying that because existing water quality does not meet the standards in Appendix E, most applications to discharge effluent/biosolids from a community sewerage scheme to water are likely to be non-complying activities?

[63] At paragraph [78] the deponent says the pSWLP encourages discharges to land. What provisions provide this encouragement?

[64] Planning – Rule 33A regulates as a discretionary activity the discharge of effluent or biosolids from community sewerage schemes into water where the Appendix E receiving water quality standards are met and the discharge doesn’t reduce quality below the standards. Where the Appendix E standards are not met by the receiving water the activity becomes non-complying (N-C). The deponent is to explain what plan provisions other than the N-C activity status in Rule 33A(b), encourage sewerage effluent discharges to land. Is there, for example, policy support for the rule?

**Topic B3, Issues 2, 5, 7, 9 and 10 relating to Policy 32, Rule 74, and Appendix A**

**Appendix A – is not ready for a consent order as Policy 16, Rule 20 and Rule 51<sup>22</sup> are subject to other appeals and the implications of the changes proposed to these provisions have not been assessed. See Footnote 8, L Maciaszek affidavit affirmed 2 February 2022**

[65] Appendix A incorporates sensitive water bodies previously listed in Appendix Q. The Regional Council decided to combine both appendices but did not transfer all the water bodies listed in Appendix Q. The consent order is to correct this oversight.

[66] Appendix A includes only those wetlands which have been formally assessed and found to be of regional significance (Note 1).

[67] The term ‘sensitive water bodies’ is not defined, but many of the water bodies to be included have wetlands along their margins. For example, the Awarua wetlands are associated with the Waituna Lagoon and the wetlands and lagoon are listed separately.

[68] Planning – does the Appendix separately list wetlands of regional significance associated with **each** of the water bodies proposed to be included in Appendix A?

[69] Planning – is it clear what is wetland and what is a water body?

## **Topic B4**

### ***Policy 28, Issue 1***

[70] Policy 28, sub-clause (b) adopts the language of NPS-FM, cl 3.24(1) and secondly, cross-references the NPS-FM definition of ‘effects management hierarchy’.

[71] The proposed plan was notified before NPS-FM 2020 was approved and

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<sup>22</sup> These provisions are noted in Ms Maciaszek’s affidavit and to this list we would add Rule 70.

subsequently published.

[72] Legal – identify the appeal and grounds relied upon to incorporate cl 3.24(1).

[73] Planning – NPS-FM, cl 3.24(1) is to be implemented by the Regional Council making or changing its regional plan as directed in cl 3.24(3). Clause 3.24(3) requires activities with a functional need for a particular location to demonstrate how each step of the effects management regime will be applied to any loss of river extent or values. In the absence of the directed policy, why is Policy 28b considered an efficient and effective means to implement the objectives?

[74] Planning – what is the rationale for adopting the NPS-FM language of ‘practicable’ here but not for other provisions in the proposed plan?

[75] Planning – in relation to effects, is Policy 28(a) more permissive than Policy 28(b)?

***Policy 29(a) – Amend by adding ‘and recreational values’***

[76] Legal – identify the appeal that sought to relocate from (b)(5) ‘recreational values’.

[77] Legal and planning – is the intent of the amendment to give greater weight to recreational values than the values listed in (b) and if so, identify the objectives this amendment is to implement.

[78] Legal and planning – if relocation of ‘recreational values’ in clause (a) is editorial, confirm no issue as to interpretation and/or implementation arises if the amendment is not made.



***Policy 29 (b)(7) – River bed extractions***

[79] Planning to clarify – should ‘historic heritage values’ refer instead to ‘values of heritage sites’? See Appendix N.

**Topic B5, Issue 103 with Appendix N**

[80] Proposes to amend Appendix N by requiring a Farm Environmental Management Plan to locate any ‘heritage site’ recorded in the relevant District Plan, New Zealand Heritage List/Rārangī Kōrero or New Zealand Archaeological website.

[81] Mr McCallum-Clark refers to ‘historic heritage site’ in his affidavit at [18].

[82] Is the term ‘heritage site’ or ‘historic heritage site’ in the Appendix N?

**Topic B6, Issues 4, 5, 7 and 10 with Policy 26A and Rule 52**

[83] Planning – why does Objective 9B include ‘nationally significant infrastructure’ but Policy 26A not?

[84] Planning – why does Policy 26A include ‘critical infrastructure’ but Objective 9B not?

**Topic B7, Issues 1, 2, 3, 7, 8, 9 and 10 with Policies 20, 24, 28, 39 and 39A**

***Policy 20 – Management of water resources***

***Policy 24 – Water abstraction for community water supply***

***Policy 28 – Structures and bed disturbance activities of rivers (including modified watercourses) and lakes***

[85] Each of the above policies is proposed to be amended by the inclusion of ‘historic heritage values’.

[86] Planning – are these values associated with ‘heritage sites’ in Appendix N? If they are, would it be clearer to say ‘values of heritage sites’?

***Policy 39 + Advice Note – Integrated management***

[87] The deponent is to expand on the statement contained at paragraph [22] of his affidavit where he writes “it will discourage applications being made that seek to exploit the narrow range of permitted farming activities that may have losses that are unregulated”.

[88] Clarify – is the Regional Council (in its capacity of consent authority) limiting its discretion under s 95D(b) or s 104(2) RMA with the result that the consent authority will have regard to an adverse effect of an activity on the environment even though the activity in question is permitted by an environmental standard or the plan?

[89] Clarify – does the Advice Note amplify Policy 39 or does it have another purpose?

**Directions**

[90] Counsel and the witnesses are directed to address the observations and questions set out above at the all parties hearing on **Monday 14 March 2022**.

[91] The court's preference is to hear from counsel first regarding the questions of interpretation and then from the witnesses on provisions where we have sought clarification.

Jane S.



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**J E Borthwick**  
**Environment Judge**

Issued: 10 March 2022

### Schedule – List of appellants

ENV-2018-CHC-26	Transpower New Zealand Limited
ENV-2018-CHC-27	Fonterra Co-operative Group Limited
ENV-2018-CHC-29	Aratiatia Livestock Limited
ENV-2018-CHC-30	Wilkins Farming Co Limited
ENV-2018-CHC-31	Gore District Council & others
ENV-2018-CHC-32	DairyNZ Limited
ENV-2018-CHC-33	H W Richardson Group Limited
ENV-2018-CHC-34	Beef + Lamb New Zealand
ENV-2018-CHC-36	Director-General of Conservation
ENV-2018-CHC-37	Southland Fish and Game Council
ENV-2018-CHC-38	Meridian Energy Limited
ENV-2018-CHC-40	Federated Farmers of New Zealand Inc
ENV-2018-CHC-41	Heritage New Zealand Pouhere Taonga
ENV-2018-CHC-44	Wilkins Farming Co Limited (previously Campbell's Block Limited)
ENV-2018-CHC-45	Wilkins Farming Co Limited (previously Robert Grant)
ENV-2018-CHC-46	Southwood Export Limited & Others
ENV-2018-CHC-47	Te Rūnanga o Ngāi Tahu, Hokonui Runāka, Waihopai Runāka, Te Rūnanga o Awarua & Te Rūnanga o Oraka Aparima
ENV-2018-CHC-49	Rayonier New Zealand Limited
ENV-2018-CHC-50	Royal Forest and Bird Protection Society of New Zealand Incorporated