

**BEFORE THE ENVIRONMENT COURT**

**I MUA I TE KOOTI TAIAO O AOTEAROA**

**IN THE MATTER OF** the Resource Management Act 1991  
**AND**  
**IN THE MATTER** of appeals under clause 14 of the First  
Schedule to the Act  
**BETWEEN** **ARATIATIA LIVESTOCK LIMITED**  
(ENV-2018-CHC-29)  
**MERIDIAN ENERGY LIMITED**  
(ENV-2018-CHC-38)  
**WAIHOPAI RŪNAKA, HOKONUI RŪNAKA, TE**  
**RŪNANGA O AWARUA, TE RŪNANGA O ORAKA**  
**APARIMA, and TE RŪNANGA O NGĀI TAHU**  
**(collectively NGĀI TAHU)**  
(ENV-2018-CHC-47)  
**ROYAL FOREST & BIRD PROTECTION**  
**SOCIETY OF NZ INC**  
(ENV-2018-CHC-50)  
*Appellants*

**AND** **SOUTHLAND REGIONAL COUNCIL**  
*Respondent*

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**MEMORANDUM ON BEHALF OF THE ROYAL FOREST AND BIRD PROTECTION**  
**SOCIETY**  
**OF NEW ZEALAND INC**  
**5 December 2022**

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## INTRODUCTION

1. This memorandum of counsel is filed on behalf of the Royal Forest & Bird Protection Society of New Zealand Incorporated in response to the Court's direction dated 2 December 2022.
2. Forest & Bird is not opposed to the adjournment. However, counsel for Forest & Bird are engaged in the same proceedings as counsel for the Regional Council and Ngā Rūnanga on 27 and 28 March 2023. Further, counsel are involved in Environment Court proceedings (the Auckland Regional Landfill hearing before Judges Smith and Dickey) due to recommence on 29 March 2023.

Dated 5 December 2022

A handwritten signature in black ink, appearing to read 'P Anderson', is written over a light grey rectangular background.

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M Downing / P Anderson  
Counsel for Royal Forest & Bird Protection Society Inc