

**BEFORE THE COMMISSIONERS APPOINTED ON BEHALF
OF THE OTAGO REGIONAL COUNCIL**

UNDER the Resource Management Act
1991 (the **Act** or **RMA**)

IN THE MATTER of an original submission on the
Proposed Regional Policy
Statement for Otago 2021
(**PRPS**)

BETWEEN **OTAGO WATER RESOURCE
USER GROUP (OWRUG)**

**Submitter OS00235 and
FS00235**

**FEDERATED FARMERS NZ
INC**

**Submitter OS00239 and
FS00235**

DAIRY NZ

Submitter FS00601

AND **OTAGO REGIONAL COUNCIL**

Local Authority

**MEMORANDUM OF COUNSEL FOR OWRUG, FEDERATED FARMERS,
AND DAIRY NZ IN RESPONSE TO MINUTE 6**

DATED 22 FEBRUARY 2023



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MEMORANDUM OF COUNSEL IN RESPONSE TO MINUTE 6**May it please the Panel:**

1. The submitters are grateful for the caucusing direction contained in Minute 6. Although not identified in paragraphs 3 and 4 of the Minute, the submissions of OWRUG¹ and Federated Farmers² sought additional SRMR issue statements, variously acknowledging the importance of the food and fibre sector and the infrastructure that supports it to the Otago economy and in turn the wellbeing of people and communities (OWRUG), and the importance of access to natural resources to the people and communities of Otago (Federated Farmers). Dairy NZ further submitted in support of Fonterra's submission and OWRUG's submission.
2. The submitters will instruct their planning expert, Dr Mike Freeman of Landpro, to participate in the caucusing jointly on their behalf and will engage directly with Mr Horne (called by Chorus, Vodafone and Spark) and Ms Tait (called by Fonterra) as set out in paragraph 10 of Minute 6.
3. This memorandum is filed simply as a record for the panel since OWRUG, Federated Farmers, and DairyNZ, were not specifically identified and mentioned in the Minute.

Dated 22 February 2023



Phil Page

Counsel for OWRUG, Federated Farmers, and DairyNZ

¹ OWRUG submission page 32- SRMR-IX.

² Federated Farmers Submission page 18, line 64