

Before the Freshwater Hearing Panel convened by the Chief Freshwater Commissioner

In the matter of Freshwater parts of the Proposed Otago Regional Policy Statement 2021

Memorandum of counsel on behalf of Otago and Central South Island Fish and Game Councils

17 August 2023

Submitters' solicitors:
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May it please the Panel

- 1 This memorandum of counsel is provided on behalf of Otago and Central South Island Fish and Game Councils (**Submitters**) in response to Minute 7 of the Freshwater Hearing Panel regarding the timetable for consideration of the National Policy Statement for Indigenous Biodiversity (**NPS IB**) 2023.
- 2 In accordance with Minute 7, the Submitters were to lodge supplementary evidence on the implications of the NPS IB for freshwater by Friday 18 August, 2023.
- 3 The Submitters advise they are intending to lodge supplementary planning and ecology evidence in respect of the NPS IB. Due to capacity constraints, and the very short timeframe between the supplementary evidence of Ms Boyd being made available on the website and the deadline to respond to that supplementary evidence, the Submitters are unable to lodge their evidence by the deadline. Accordingly, they respectfully seek a short two working day extension to the deadline.

Directions sought

- 4 The Submitters respectfully seek they be required to respond on those aspects of the implications of the NPS IB for freshwater by Tuesday 22 August, 2023.

Dated this 17th day of August 2023

Maree Baker-Galloway

Maree Baker-Galloway/Laura McLaughlan
Counsel for the Otago and Central South Island Fish and Game Councils