BEFORE THE HEARING PANEL APPOINTED BY THE CHIEF FRESHWATER COMMISSIONER FOR THE FRESHWATER PARTS OF THE PROPOSED OTAGO REGIONAL POLICY STATEMENT

Under	the Resource Management Act 1991
And	
In the matter of	the parts of the proposed Otago Regional Policy
	Statement considered to be a Freshwater Planning
	Instrument

Memorandum of Counsel on behalf of the Director-General of Conservation Tumuaki Ahurei responding to 4th Minute of the Freshwater Hearing Panel Dated: 28 June 2023

Department of Conservation | *Te Papa Atawhai* RMA Shared Services Private Bag 4715 Christchurch 8140 Phone waea: 027 298 3268 Solicitor rōia: Rosemary Broad

May it please the Freshwater Hearing Panel (the Panel),

The following matters are put forward on behalf of the Director-General of Conservation Tumuaki Ahurei (the Director-General)

- 1. I refer to Minute 4, issued by the Chair of the Panel on 22 June 2023.
- 2. That Minute directs that submitters identify what evidence from the non-freshwater hearing process they wish to have taken into account in the freshwater process.
- 3. I request the following is taken as re-filed in the freshwater process;
 - a. Murray Brass
 - Evidence dated 23 November 2022, in particular paragraphs relating to habitat of trout and salmon (38-41), IM-P1 integrated approach to decision-making (53-65), Chapter 9 Land and Freshwater (99-112), Chapter 10 Ecosystems and Indigenous Biodiversity (113-119);
 - ii. pORPS Land and Freshwater chapter (LF) speaking notes for Murray Brass dated 8 May 2023.
 - b. Bruce McKinlay
 - i. Evidence dated 23 November 2022 in its entirety.
 - c. Dr Marine Richarson
 - i. Evidence dated 23 November 2022 in its entirety;
 - ii. pORPS Ecosystems and Indigenous Biodiversity Chapter (ECO) speaking notes for Dr Marine Richarson produced 19 April 2023;
 - iii. pORPS Land and Freshwater chapter (LF) speaking notes for Dr Marine Richarson dated 2 May 2023 and produced 9 May 2023.
- Please note that expert evidence specific to the freshwater proceeding from Mr Brass, Mr McKinlay, Dr Richarson, and Dr Dunn has been filed today 28 June 2023.

RBroad

Rosemary Broad Counsel for the Director-General