

**BEFORE THE FRESHWATER COMMISSION**

**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**

**Submitter FPI043**

**FEDERATED FARMERS NZ INC**

**Submitter FPI026 and FSFPI026**

**DAIRY NZ**

**Submitter FPI024 and FSFPI024**

**AND** **OTAGO REGIONAL COUNCIL**

**Local Authority**

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**MEMORANDUM OF COUNSEL ON BEHALF OF SUBMITTERS  
REGARDING NPSIB AMENDMENTS**

**DATED 18 AUGUST 2023**

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**MEMORANDUM OF COUNSEL****May it please the Panel:**

1. This memorandum is filed on behalf of OWRUG, Federated Farmers New Zealand and DairyNZ (**Farming Submitters**) who lodged original and further submissions on the FPI-PRPS.
2. We refer to the supplementary evidence of Ms Boyd in relation to the NPSIB. The purpose of this memorandum is to note that the submitters do not agree with a number of the proposed amendments, however the reasons for this relate to legal issues and matters of statutory interpretation. Counsel intends to address these matters in opening legal submissions on the 29<sup>th</sup> August.

Dated 18 August 2023

A handwritten signature in blue ink, appearing to read "Bridget Irving".

Bridget Irving / Gus Griffin

Counsel for OWRUG, Federated Farmers NZ and DairyNZ