

**BEFORE THE ENVIRONMENT COURT  
AT WELLINGTON**

**ENV-2019-WGN-000133**

**UNDER**

the Resource Management Act 1991

**IN THE MATTER OF**

an appeal under clause 14(1) of Schedule 1 of the Act in relation to the Proposed Natural Resources Plan for the Wellington Region

**BETWEEN**

**BEEF + LAMB NEW ZEALAND LTD**

**Appellant**

**AND**

**WELLINGTON REGIONAL COUNCIL**

**Respondent**

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**NOTICE OF PERSON'S WISH TO BE PARTY TO PROCEEDINGS**

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**FEDERATED  
FARMERS**  
OF NEW ZEALAND

Level 6, Wellington Chambers,  
154 Featherston St  
PO Box 715  
Wellington 6140  
Telephone: 0800 327 646  
Email: [emcgruddy@fedfarm.org.nz](mailto:emcgruddy@fedfarm.org.nz)

## NOTICE OF PERSON'S WISH TO BE PARTY TO PROCEEDINGS

*Section 274, Resource Management Act 1991*

To: **The Registrar**  
**Environment Court**  
**Wellington**

1. Federated Farmers of New Zealand Inc (**FFNZ**) wishes to be a party to proceedings with Environment Court reference ENV-2019-WGN-000133 (**Proceedings**) in the appeal by Beef + Lamb New Zealand Ltd (**B+L**) against decisions of Wellington Regional Council (**Council**) on the Proposed Natural Resources Plan (**pNRP**) for the Wellington Region.
2. FFNZ made a submission and further submissions on the pNRP.
3. FFNZ has an interest in the proceedings that is greater than the interest that the general public has:
  - 3.1 The subject matter of the appeal is a matter of interest to farmers who rely on natural and physical resources in the region in making their livelihoods.
  - 3.2 There is a potential for farmers in the region to be directly impacted by the terms of the appeal.
  - 3.3 FFNZ is a representative body for farmers, so it is in an appropriate position to represent the interests of farmers who may be impacted by the terms of the appeal.
4. FFNZ is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991.
5. FFNZ is interested in all the proceedings.
6. FFNZ supports *or* opposes *or* conditionally opposes the relief sought as follows—

6.1 **Table 3.4.** - FFNZ supports the Appellant's appeal point on Table 3.4 (**O25**) and agrees with the Appellant for the reasons provided in its notice of appeal including that freshwater objectives for improvement should be identified in the whitua process. FFNZ supports amendments to Table 3.4 to provide for maintenance within current bands, pending that whitua process.

6.2 **New Policy for nutrient allocation** - FFNZ opposes the new policy – nutrient allocation framework - proposed by the Appellant. FFNZ does not support allocation of nitrogen or phosphorus, amongst other reasons, because:

- a. allocation relies on modelled estimates which are too uncertain, and is not the most appropriate way to manage the effects of urban or rural nutrients.
- b. allocation principles are premature and will unnecessarily fetter the whitua process.

FFNZ also does not support the particular principles proposed by the Appellant, amongst other reasons, because there is no reliable proxy for natural capital of soils and land use capability is not the most appropriate way to allocate nutrients.

7. FFNZ agrees to participate in mediation or other alternative dispute resolution of the proceedings.



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**Martin Johan Meier**

For Federated Farmers of New Zealand Inc

**DATE:** 9 October 2019

**Address for service of appellant:**

Telephone: 027 217 6732

Email: emcgruddy@fedfarm.org.nz

Contact person: Elizabeth McGruddy

