

**IN THE ENVIRONMENT COURT  
CHRISTCHURCH REGISTRY**

**ENV- 2025-CHC-**

**I MUA I TE KOOTI TAIAO O AOTEAROA  
ŌTAUTAHI ROHE**

**IN THE MATTER**

of an appeal under Clause 14 of the  
First Schedule of the Resource  
Management Act 1991

**AND IN THE MATTER**

of the proposed Te Tai o Poutini Plan

**BETWEEN**

**FEDERATED FARMERS OF NEW  
ZEALAND INCORPORATED**  
**Appellant**

**AND**

**TE TAI O POUTINI PLAN  
COMMITTEE**  
**Respondent**

---

**SECTION 274 NOTICE BY THE ROYAL FOREST AND BIRD PROTECTION  
SOCIETY OF NEW ZEALAND INCORPORATED**

29 January 2026

---

---

Royal Forest and Bird Protection Society of New Zealand Incorporated

Solicitor acting: E. Toleman

Email: [e.toleman@forestandbird.org.nz](mailto:e.toleman@forestandbird.org.nz)

Phone: 021 988 315

Counsel: P Anderson

Email: [peter@peteranderson.co.nz](mailto:peter@peteranderson.co.nz)

Phone: 0212866992

## SECTION 274 NOTICE

1. The Royal Forest and Bird Protection Society of New Zealand Incorporated (Forest & Bird or the Society) wishes to be a party to the appeal by Federated Farmers of New Zealand Incorporated (Appellant) on the Te Tai Poutini Plan Committee (Respondent) decisions on the Proposed Te Tai Poutini Plan (TTPP).
2. Forest & Bird made a submission and a further submission on the TTPP.
3. Forest & Bird is not a trade competitor for the purposes of section 308D of the Resource Management Act 1991.
4. Forest & Bird has an interest greater than the public generally, as an incorporated society with a well-known role in the protection of indigenous biodiversity.<sup>1</sup>
5. Forest & Bird is interested in all of the proceedings.
6. Forest & Bird opposes the relief sought as it does not promote sustainable management. This includes that the relief sought:
  - a. includes inappropriate exclusions for grazing activities and farm quarries, resulting in potential for significant and cumulative loss of indigenous vegetation and habitats;
  - b. seeks changes the Plan provisions on reducing greenhouse gas emissions so that they only consider transport systems. This would inappropriately exclude farm animals, other farm activities as well as any other activities which could currently be considered under the Plan decision wording.
  - c. increase (and in some cases remove) thresholds for indigenous biodiversity clearance as a permitted activity. This is particularly inappropriate given that a district-wide assessment for Significant Natural Areas has not yet been undertaken.
  - d. These changes do not give effect to the RPS and national direction, including the NZCPS and the NPSIB

---

<sup>1</sup> See Marlborough District Council v Burkhardt Fisheries Ltd [2018] NZEnvC 26 and [31]

7. Forest & Bird agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated: 29 January 2026

A handwritten signature in black ink, appearing to read "Anderson", is centered within a light gray rectangular box.

---

Peter Anderson  
Counsel for Royal Forest And Bird Protection Society of New  
Zealand Incorporated