

**IN THE ENVIRONMENT COURT AT
AT CHRISTCHURCH**

ENV-2025-CHC-000110

**I TE KOTI TAIAO O AOTEAROA
KI ŌTAUTAHI**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of an appeal under clause 14(1) of the First Schedule of
the Act and pursuant to Section 274 of the Act

BETWEEN **DIRECTOR-GENERAL OF CONSERVATION**

Appellant

AND **THE TE TAI O POUTINI PLAN COMMITTEE**

Respondent

**NOTICE OF FEDERATED FARMERS OF NEW ZEALAND
INCORPORATED'S WISH TO BE PARTY TO PROCEEDINGS**

2 February 2026



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TO: The Registrar of the Environment Court at Christchurch

AND TO: The Director-General of Conservation (**Appellant**); and
the Te Tai o Poutini Plan Committee (**Respondent**).

1. Federated Farmers of New Zealand Incorporated (**Federated Farmers**) gives notice pursuant to section 274 of the Resource Management Act 1991 (**RMA**) that it wishes to be a party to the following proceedings:

The Director-General of Conservation v Te Tai o Poutini Plan Committee ENV-2025-CHC-000110 (**Appeal**).

2. Federated Farmers made a submission (submitter number S524) about the subject matter of the proceedings.
3. Federated Farmers has an interest in the proceedings that is greater than the interest that the general public has. The subject matter of the proceedings directly impact what farmers can do with their land. Federated Farmers is a primary sector organisation that represents the interests of farmers and rural communities.
4. Federated Farmers is not a trade competitor for the purposes of section 308C or 308CA of the RMA.
5. Federated Farmers is interested in all of the proceedings, as they relate to Ecosystems and Indigenous Biodiversity provisions of the Te Tai o Poutini Plan (**the Plan**), being objective ECO-O3 and rules ECO-R1 and ECO-R6.
6. Federated Farmers oppose the relief sought because:
 - (a) Objective ECO-O3, while not ideally framed as an objective, performs an important signalling function for plan users. It recognises that, in addition to the protection of significant indigenous biodiversity provided for in ECO-O2, there is some

scope for appropriate subdivision, use and development that may affect significant indigenous biodiversity.

No other objectives in the ECO chapter expressly acknowledge this relationship between indigenous biodiversity and land use and development, and the removal of ECO-O3 would leave a gap in the strategic framework by failing to recognise the need to manage effects arising from lawful land use and development. Federated Farmers would prefer the objective be more clearly drafted, rather than be deleted altogether.

- (b) In relation to rules ECO-R1 and ECO-R6, the relief sought is inconsistent with Federated Farmers understanding of the intended structure and application of rule framework.

While Federated Farmers agrees that the drafting should be clearer about the relationship between the rules, it considers that it would be inappropriate and unworkable to impose rule ECO-R1 area limits on indigenous vegetation clearance undertaken for specific purposes under rules ECO-R2 to ECO-R6.

For example, imposing the ECO-R1 limits onto maintenance of existing lawful structures and activities as expressly provided for under rule ECO-R3, would result in the need for resource consent for routine maintenance, such as for fencing or water supply pipelines, and grazing activities, particularly on larger farms.

- (c) The relief requested by the Appellant is inconsistent with Part 2 of the RMA, as it does not appropriately provide for the sustainable management of natural and physical resources, which includes enabling the appropriate use, development, and subdivision of those resources to provide for the social, economic, and cultural wellbeing of people and communities.

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



K L Sannazzaro
Senior Policy Advisor

Dated: 2 February 2026

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Advice

If you have any questions about this notice, contact the Environment Court in Auckland, Wellington, or Christchurch.