

**BEFORE COMMISSIONERS APPOINTED
BY THE WAIKATO REGIONAL COUNCIL**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the First Schedule to the Act

AND

IN THE MATTER of Waikato Regional Plan Change 1- Waikato
and Waipā River Catchments and Variation 1
to Plan Change 1

AND

IN THE MATTER of submissions under clause 6 First Schedule

BY **BEEF + LAMB NEW ZEALAND LIMITED**
Submitter

**SECOND MEMORANDUM OF COUNSEL FOR BEEF+LAMB NEW
ZEALAND LTD PROVIDING ANSWERS TO PANEL'S HEARING STREAM
1 QUESTIONS
7 May 2019**

FLETCHER VAUTIER MOORE
LAWYERS
PO BOX 3029
RICHMOND 7050

Telephone: (03) 543 8301
Facsimile: (03) 543 8302
Email: cthomsen@fvm.co.nz
Solicitor: CP Thomsen

MAY IT PLEASE THE COMMISSIONERS:

1. In Beef+Lamb NZ Ltd's first memorandum answering the Panel's questions from Hearing Stream 1, Counsel advised that a copy of a paper cited in Mr Parkes' evidence by Snelder (2018) had not yet been obtained.
2. A copy of that paper has now been provided to Counsel and is attached to this memorandum as Appendix MC10.
3. Secondly, in Dr Dada's reply to the questions of him from the Panel (see Appendix MC 1) he was unable to point to a particular part of McDowell & Wilcock (2008) that confirmed the basis on which the loadings referred to in Figure 3 were obtained. Direct enquiries were made of the authors and they have confirmed that where estimate loads were required they were annually based (*E coli*/ha/year) and therefore based on average annual flows.



C Thomsen / K Lee

Counsel for Beef+Lamb New Zealand Ltd

7 May 2019