Accumulative Environmental, Cultural and Community Impacts of Proposed Sand Mining in Te Ākau / Bream Bay

Whangarei Heads Citizens Association

For Community, By Community

To: Catherine Somerville-Frost (Chair), Troy Brockbank, Dr Malcolm Green
Expert Panel, Bream Bay Sand Extraction Project
Fast-track Application 082

Submitted by: Whangarei Heads Citizens Association (WHCA)
Date: 26 May 2026

Tēnā koutou e te Panel,

The WHCA submits in opposition to McCallum Brothers' application to extract up to 250,000 m^3 of sand annually from Te Ākau Bream Bay for 35 years.

Executive Summary

1. No regional benefit

Whangārei District Council unanimously opposed the application. The sand is for Auckland. Northland carries all the risk. Independent analysis found the applicant's economic claims "incomplete, exaggerated or wrong."

2. Closed sand system

Sand extracted from the ocean floor was deposited thousands of years ago and will not naturally replenish. Once removed, it cannot buffer the coastline, threatening dunes that protect communities and provide habitat for the critically endangered tara iti.

3. Nationally significant marine habitat

Te Ākau Bream Bay is a nationally significant marine habitat – a pristine, healthy, and thriving ecosystem that supports a diverse range of wildlife, including nationally critical, vulnerable, and endangered species, marine mammals, and seabirds.

4. Poor compliance history

The Environment Court found the company's ecological evidence "patchy" and "inconclusive," with dredging leaving 2.7 m deep trenches at Pakiri. The company was under DOC investigation for alleged unlawful disturbance of protected corals.

5. Process failures

The Expert Panel itself acknowledged the Whangārei District Council was not automatically entitled to comment, and that several iwi were nearly excluded – flaws the Panel had to manually correct.

6. Cumulative effects ignored

The proposal cannot be assessed in isolation from Northport expansion or from the cumulative trajectory of industrial development planned for this coastline. Together – and alongside future projects not yet proposed – they represent a "death by a thousand cuts" for an already stressed ecosystem. Each approval narrows the window for recovery and edges Te Ākau Bream Bay closer to irreversible ecological decline.

Conclusion

The WHCA respectfully requests the Panel decline the application. There is no local economic benefit, unacceptable environmental and economic risk, and a pattern of non-compliance. The community is united in opposition.

Ngā mihi nui ki a koutou.

1. Introduction

1.1 About the Whangārei Heads Citizens Association

The Whangārei Heads Citizens Association Incorporated (WHCA) was established in 1951. The organisation works to keep the community informed and engaged on matters affecting the Whangārei Heads area, including local government planning, infrastructure, environmental management, growth and development.

The WHCA works to support and advocate for a resilient and connected community. The association owns and operates the McLeod Bay Community Hall and produces a bi-monthly newsletter distributed to more than 1,000 residents.

Following widespread public concern regarding the proposed marine sand extraction project in Te Ākau Bream Bay, the WHCA established a dedicated “No Sand Mining” subcommittee to coordinate community engagement and advocacy.

This submission is made in response to a formal invitation from the Expert Panel. WHCA appreciates the opportunity to comment on Application 082 by McCallum Brothers Limited under the Fast-track Approvals Act 2024 (New Zealand Fast-track Approvals Expert Panel, 2025).

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2. Background and Context

2.1 The Proposed Development

McCallum Bros Limited have applied to Fast Track the Bream Bay Sand Extraction Project, which seeks to harvest sand over a 35-year period in Northland. The proposal involves using a suction dredge to extract up to 250,000 m^3 of sand annually from a 17km^2 offshore area, with the material intended for the Auckland construction market. The extraction area sits in the middle of Bream Bay (Fast-Track Approvals, 2026; see Appendix A).

While the Ministry for the Environment confirms the project meets the initial eligibility criteria for fast-track approval, the Department of Conservation (DOC) and NIWA raised

concerns regarding the impact on protected cup corals and local marine ecosystems (DOC, 2026, p. 2).

2.2 Significance of Te Ākau Bream Bay

Te Ākau Bream Bay is an area of significant economical, ecological, cultural, recreational and social importance to Northland communities and tangata whenua.

The Expert Panel has formally recognised that the proposed extraction area is located within a zone of "cultural, intrinsic, ecological, recreational, amenity and other values" (New Zealand Fast-track Approvals Expert Panel, 2025). This acknowledgement underscores that the area is not a barren industrial site but a living environment that supports taonga species, customary practices, and community wellbeing.

Bream Bay and Whangārei Heads represent one of the most recognisable and iconic coastal landscapes in Te Tai Tokerau. For over 800 years the area has sustained coastal communities through settlement, customary food gathering, trade, and cultural identity.

While the landscape has changed over time through development, forestry, farming, industry and port infrastructure, many areas of ecological and cultural significance remain intact.

Whangārei Heads contains one of the highest-quality remaining coastal forest systems in Northland and supports significant indigenous biodiversity, including threatened and at-risk species (DOC, 2003).

The marine environment of Bream Bay similarly supports important ecological processes and is extensively used for kaimoana gathering, recreation, tourism, and community wellbeing, as well as sustaining local economic activity including commercial fishing, fishing charters, and dive tourism.

Ocean Diversity Sea Adventures NZ (oceandiversity.nz) is a locally owned marine tourism business. Its owner, Blair Jones, has observed and can confirm the rich marine wildlife found in and around Te Ākau Bream Bay, including green and olive ridley turtles, giant petrels, bottlenose and common dolphins, blue penguins, bryde’s and humpback whales, and orca.

The full economic value of which must be weighed by the expert panel against any proposed economic impacts.

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3. Community Opposition and Public Concern

3.1 Community Engagement and Public Response

The WHCA has received exhaustive feedback from residents, businesses, environmental organisations and visitors expressing strong opposition to the proposed sand mining operation.

This opposition has been demonstrated through:

- Public meetings / Presentations
    - Presentation petition to Northland Regional Council Meeting (22 April 2025) by Brenda Leeuwenberg on behalf of Concerned Communities Against Sand Mining and the Endangered Species Foundation (Leeuwenberg, 2025; see Appendix B)
    - Presentation to Northland Regional Council Meeting (22 April 2025) by Mary Sinclair and Malcolm Morrison on behalf of Bream Bay Guardians Society (see Appendix C)
    - Presentation petition to Whangārei District Council Meeting (29th April 2025) by Bruce Copeland on behalf of Concerned Communities Against Sand Mining and Bream Bay Guardians Society (see Appendix D)
    - Presentation to Whangārei District Council Meeting (18 December 2025) by Mary Sinclair on behalf of Bream Bay Guardians Society (see Appendix E)
    - Notice of Motion by Councillor David Baldwin presented Whangārei District Council Council Meeting (18 December 2025) passed unanimously 13 votes to 0 (Live News, 2025; see Appendix F)
- Beach/boat protests
- Community petitions / surveys
    - Endangered Species Foundation delivered a 14,000-signature petition to to Parliament Opposing Sandmining Te Ākau Bream Bay (5th March 2025) (RNZ, 2025, March 11)
    - Survey of public opinions about the proposal by McCallum Brothers to mine marine sand in Te Ākau Bream Bay. Conducted by the Bream Bay Guardians Society (see Appendix G & H)
- Engagement with local government
- Coordination with iwi, hapū and environmental organisations

Public Events

- Beach Protest – January 2025, ~1500 attendees (Local Matters, 2025)
- Boat Protest - March 2025, 100 attendees (RNZ, 2025)
- Rally NZ First public meeting – August 2025, ~100 attendees despite severe weather (NZ Herald, 2025)

- Beach Rally – October 2025, ~500 attendees (RNZ, 2025)
- Beach Protest – March 2026, ~700 attendees (RNZ, 2026)

As detailed in subsequent sections of this report, community opposition to the proposal is substantial across Northland, with concerns relating to the lack of demonstrated local economic benefit, environmental degradation, cumulative ecological impacts, and risks to long-term ecosystem resilience.

3.2 Political and Civic Opposition

Opposition to the project extends well beyond local residents.

The Whangārei District Council voted unanimously to oppose the proposal under the fast-track process, citing concerns regarding a lack of robust analysis relating to the economic benefits, ecological risk and limited public participation (WDC, 2025).

Remarkably, the Whangārei District Council was not automatically entitled to comment on the proposal. The Expert Panel assessing the application acknowledged a fundamental flaw in the fast-track legislation: because the extraction site lies within the coastal marine area, the mandatory invitation process "limits the mandatory invitation to regional councils only," excluding the district council whose constituency would bear the onshore effects of the project (New Zealand Fast-track Approvals Expert Panel, 2025).

Prior to local government elections, the WHCA surveyed all 41 Whangārei District Council candidates regarding their position on marine sand mining in Te Ākau Bream Bay (see Appendix I).

Results included:

- 35 candidates opposed the proposal
- 1 candidate was neutral
- 5 candidates did not respond

Public opposition has also been expressed by:

- Whangārei District Council Mayor Ken Couper (Couper, 2026;
- Whangārei District Council Deputy Mayor Scott McKenzie
- Far North Mayor Moko Tepania
- Northland Regional Council Chair Pita Tipene
- Northland Regional Council Councillor Amy Macdonald
- Green MP Hūhana Lyndon (Green Party, 2025)
- Various hapū and iwi representatives

Northland Regional Council have also opposed the project on ecological, economic, cultural and community grounds saying “"Based on the concerns expressed by the communities council represents, the impacts of the proposal on the rights and interest

of our Te Tiriti partners, and the uncertainty associated with the impact of the proposal on marine ecology, NRC opposes the proposal." (Northland Regional Council, 2026).

When mayors, councillors, iwi leaders and Members of Parliament speak with one voice, the Expert Panel should ask itself: who, beyond the applicant, is this project actually for?

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4. Environmental Concerns

4.1 Closed Sand System and Coastal Processes

The proposal repeatedly defers critical environmental protections to uncertified plans or future PSEARs (Pre-Sand Extraction Assessment Reports). This puts the burden on the environment after damage may have begun – a reactive, not precautionary, approach (Fast-Track Panel, 2026d).

Local experts, community leaders, and scientific evidence presented to the Fast-track process agree that the Bream Bay sand system is "closed": sand extracted from the ocean floor was deposited thousands of years ago and will not naturally replenish within meaningful human timescales. Once removed, the sand cannot buffer the coastline, threatening foreshore dunes - a concern evidenced by previous dredging at Pakiri, which left trenches up to 2.7 metres deep and significantly altered the seabed, with ecological recovery expected to take many years or decades.

Sand mining doesn't just risk environmental harm - it risks real economic damage. Mangawhai experienced falling house prices and a frozen property market when its sand system was destabilised. Bream Bay's tourism and beachfront property values – major local economic drivers - face the same threat (Stuff, 2025).

Communities and The Department of Conservation (DOC) contribute significant hours and resource to maintaining the coastline and foreshore dunes to protect habitats for birds, plants and grasses including New Zealand’s most endangered species such as the Tara Iti which nests in coastal dunes adjacent to the proposed project area (Auckland Zoo, 2026; Endangered Species Foundation, 2025).

Potential consequences include:

- Altered sediment transport
- Beach and dune erosion
- Reduced coastal resilience
- Changes to tidal and wave dynamics
- Long-term geomorphological instability

These risks are especially concerning in the context of sea-level rise and increasing climate-driven storm events — but they must also be assessed alongside the carbon footprint of marine sand mining, transportation, and consumption. The ocean absorbs over 90% of excess planetary heat and approximately a quarter of human-induced CO_2 emissions; the expert panel should weigh how seabed disturbance, sediment resuspension, and industrial extraction interact with this critical climate function (Graves et al., 2022).

4.2 Impacts on Marine Ecosystems

Fisheries New Zealand has already identified significant ecological decline within the Whangārei coastal marine environment.

Temporary closures of shellfish beds in Northland including areas adjacent to the proposed project site such as Urquhart's Bay, Marsden Bank and Mair Bank, have been implemented under the Fisheries Act 1996 due to declining pipi and scallop populations and to protect the broader ecosystem as it struggles to recover from environmental stress (Fisheries NZ, 2024).

The whole Eastern Northland rock lobster fishery (CRA 1) has been closed to allow stock rebuilding, reflecting broader ecosystem stress within the region (Parker, 2025a).

A strict rāhui (customary temporary fishing closure) covers the waters around Maunganui Bay (Deep Water Cove) on the Cape Brett peninsula prohibiting all fishing and the taking of marine life (except for gathering kina) to help restore depleted fisheries (NRC, 2026).

The inner Hauraki Gulf has been closed for three years to commercial and recreational spiny rock lobster fishing to help rebuild the population (Parker, 2025b).

These closures indicate that key benthic and reef-associated species are already under immense pressure. International peer-reviewed literature consistently demonstrates that marine sand extraction activities exacerbate such stressors through direct benthic habitat removal, increased turbidity, and disruption of larval settlement processes essential for shellfish and crustacean recruitment. For example, Desprez (2000) recorded 80–90% reductions in benthic species richness, abundance, and biomass following aggregate extraction, along with lasting changes to recruitment-driven community structure. Given the sensitivity of suspension-feeding bivalves and reef-associated species to sedimentation and habitat alteration, the addition of industrial-scale seabed disturbance is likely to compound existing ecological decline rather than support recovery.

The proposed extraction area supports a complex marine ecosystem that is already in decline and under pressure, shellfish beds and crayfish are considered vulnerable enough to warrant legal protection, and fisheries values are significant in the area:

- Corals

    - Scleractinian Cup Corals. DOC warns that sand extraction operations will "almost certainly impact protected corals"; two endemic species, *Kionotrochus suteri* and *Stephanotrochus ralphae*, endemic species only found in NZ, and only in a limited area of the territorial sea (DOC, 2026; NIWA, 2025).
- Shellfish beds
    - Due to dredging and historical overexploitation, currently all shellfish harvesting around Whangarei is closed due to depleted populations (Fisheries, 2024).
- Marine invertebrates and benthic communities.
    - While research into the direct benthic impacts of sand mining in Bream Bay is limited, studies on analogous physical disturbances, such as commercial dredging, provide strong evidence of likely effects. For example, a major study in New Zealand's Hauraki Gulf attributed 15-20% of the change in benthic community composition to physical disturbance by dredging and trawling gear (Thrush et al., 1998).
- Crayfish habitat
    - A current 5-year ban on taking spiny rock lobster (crayfish) along the Northland and upper east coast of New Zealand officially took effect on April 1, 2026 (Parker, 2025a).
- Olive Ridley, Green and Leatherback turtles
    - Seabed disturbance and increased vessel activity along migration routes adds further pressure to populations already listed as vulnerable or endangered under the IUCN Red List.
- Nursery habitat for fish species
    - Recreational fishing stakeholders have reported that commercial pilchard trawling is occurring intensively in Bream Bay, with concerns raised that this activity contributes to overfishing pressures on local marine ecosystems (Dixon, 2024).
- Seabird feeding areas (see Appendix J).
    - A conservative total of 34 seabird taxa, of which 82% of seabird taxa are classified as either ‘Threatened’ or ‘At Risk’ under the New Zealand Threat Classification System (NZTCS) occur within the Te Ākau Bream Bay area.

        - Threatened species include: Northern NZ dotterel, banded dotterel, Caspian tern, reef heron, lesser knot (Hansen, 2019)

        - At Risk species include: white-fronted tern, oystercatchers, red-billed gull, little penguin, bar-tailed godwit, bulls shearwater, sooty shearwater, South Island pied oystercatcher

        - Relic species: Cooks petrel, diving petrel, white faced storm petrel, fleshfooted petrel, fluttering shearwater, black shag, little (pied) shag

        - Nationally Endangered species: The Australasian bittern

    - Nationally Critical species: The Tara iti / NZ fairy tern - one of the world's rarest seabirds (Lundquist et al., 2024)

Fishes are highly mobile and typically avoid temporary disturbances, returning when conditions normalize. However, 35 years of daily noise and exposure will displace them permanently.

Large-scale seabed disturbance generates multiple ecological effects, including:

- Sediment plumes and reduced water clarity
- Habitat destruction
- Disruption of food chains and changes to prey abundance or availability
- Noise impacts (both airborne and underwater)
- Exclusion from marine habitat and loss of terrestrial breeding habitat
- Direct interaction with sand extraction vessels
- Risk of fuel or oil spills

The proposal raises concerns regarding cumulative impacts on species already under pressure across northern New Zealand. Communities are increasingly witnessing declining shellfish populations, rāhui and fisheries closures across the upper North Island, including restrictions affecting scallops, crayfish and customary gathering areas.

The degradation of another significant marine ecosystem risks compounding these broader regional declines.

4.3 Credibility of Applicant's Expert Evidence

Every specialist assessment submitted in support of the application was commissioned and paid for by McCallum Bros Limited. While the experts have signed declarations of independence, the inherent risk of bias in applicant-funded research is well-documented. The Panel should therefore treat these reports as advocacy documents, not independent assessments.

McCallum Bros own expert, Dr Jennifer Beaumont of NIWA, signed a declaration affirming her independence and impartiality (Consolidated Expert Declaration, 2025, p. 2). However, in the NIWA cup coral report itself, NIWA disclosed that it "may oppose the extraction" due to a direct financial conflict of interest, namely its "many tens of millions of dollars investment in major aquaculture facilities" located "proximal to the proposed sand extraction area" (NIWA, 2025, p. 3). This contradiction raises serious questions about the independence of the applicant's ecological assessments.

Furthermore, the author of the applicants Landscape and Natural Character Effects Assessment explicitly acknowledges that it relies 'very largely' on other applicant-commissioned reports for its conclusions on biophysical effects (Brown NZ Ltd, 2025, p. 25). This means the landscape assessment has no independent evidentiary weight; it merely restates the findings of other reports whose credibility is already in question.

Additionally, Brown dismisses cultural concerns not in the management plan, compares dredging to existing shipping and has never seen the seabed.

Additionally, West (2026) stated in his expert evidence “the future state of the environment absent consent, I accept that the cessation of commercial scallop dredging may allow aspects of the wider Bream Bay benthic environment to improve over time. However, the extent, rate, and location of any such improvement are uncertain”.

Where an activity may prevent or delay an uncertain but possible environmental improvement, the precautionary approach requires that the benefit of the doubt be given to the environment, not to the extractive activity.

4.4 Marine Mammals

Community members and marine experts have expressed concern regarding potential impacts on whales, dolphins and orca populations. The name Whangārei Terenga Parāoa translates as "the gathering place of whales" for good reason. Te Ākau Bream Bay is a biodiversity hotspot for marine megafauna that supports foraging, breeding and resting behaviours, and includes important habitat.

Internationally renowned underwater cinematographer Andre Rerekura (andrererekuracreative) adds “Bream Bay is part of a much broader connected marine system that supports highly mobile marine species. Through filming work for the BBC’s Mammals series, I had the opportunity to spend time documenting beautiful false killer whales in the Hauraki Gulf and later sheltering from weather in Bream Bay, reinforcing how interconnected these coastal ecosystems are - productive embayment’s, healthy seabed’s, water quality, and natural ocean processes support the food webs and movement corridors that marine mammals rely on.”

McCallum Bros claims that the area is well-studied or low risk is in contrast to the first dedicated megafauna survey of the area (Brough et al., 2025). This study documented the largest population of semi-resident coastal bottlenose dolphins in New Zealand, with an estimated 288 individuals showing high residency in Bream Bay. Bryde's whales were recorded at sighting rates equal to or higher than those in the Hauraki Gulf, New Zealand's recognised hotspot for the species. Critically, regular foraging behaviour was observed for all commonly occurring marine mammals, and calves were present in 71% of bottlenose dolphin encounters and 16% of Bryde's whale encounters, confirming the area functions as both a foraging ground and a nursery for threatened species (Brough et al., 2025).

- Bottlenose dolphins (Nationally Endangered) Te Ākau Bream Bay may be becoming the preferred habitat over Bay of Islands due to stressors such as impact of vessels and tourism. If dolphins are in Bream Bay because it is quieter, increasing industrial traffic will displace them (Brough et al., 2025).
- Common dolphins

- Orca (killer whales)
- New Zealand fur seals
- Long-finned pilot whales
- False killer whales (small resident population with high site fidelity to the exact area proposed for sand mining) (Tezanos-Pinto & Bohorquez, 2024)
- Bryde's whales (Nationally Critical) (G's Dive & Fishing Adventures, 2023)
- Southern right whales (Piper 2024)
- Humpback whales (Degraaf, 2025)

Noise, sediment disturbance and habitat disruption will likely affect:

- Navigation and migratory corridors
- Feeding behaviour
- Communication
- Prey availability

The project involves a 68m vessel operating up to 23 vessel trips/month over a 35-year consent, removing 8.45 million m^3 of sand while creating sediment plumes and underwater noise that will disrupt whale and dolphin habitat.

In 2025, the Whetu Report 2025 noted that no Marine Mammal Management Plan (MMMP) had been published by McCallum Bros for review. Since then, the applicant has commissioned a MMMP, however, key mitigation frameworks from it are either untested or remain unavailable.

McCallum Bros recent Marine Mammals Environmental Impact Assessment concedes that a) the proposed extraction area is a biologically significant habitat for a threatened species b) modelling predicts that the dredge will be audible through most of Te Ākau Bream Bay for all marine mammal species and that masking will be the most widespread instantaneous impact c) admits that Bryde's whales are at risk of ship strike d) there is significant chance that nationally vulnerable species will be displaced (SLR Consulting NZ, 2026)

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5. Cultural Concerns

5.1 Applicant Compliance History

The credibility of the applicant is also a significant concern. The Pakiri community fought for decades to end sand mining before McCallum Bros withdrew their application – now the company is simply relocating the same destructive activity to Bream Bay.

McCallum Brothers has previously faced allegations and enforcement action relating to dredging activities near Pakiri, including:

- Dredging outside consented areas
- Dredging trenches substantially deeper than authorised
- Disturbance of stony coral habitat
- Failure to report the death of marine wildlife

In the 2024 Environment Court found the company's ecological evidence was patchy, inconclusive and the cultural effects on mana whenua could not be mitigated. The court also found works undertaken had not been properly monitored by the overseeing council. McCallum Bros was then ordered to pay Ngāti Manuhiri Kaitiaki Charitable Trust $450,000 and Clapshaw's legal and investigative costs of $50,000 (RNZ, 2025b)

This pattern of non-compliance has continued into the current fast-track process. The applicant requested an extension to respond to the Expert Panel's requests for information but failed to address statutory provisions that would appear to prevent such an extension. Furthermore, the Panel has acknowledged that three different versions of the draft consent conditions are now in circulation – the original application (January 2026), a revised version (May 2026), and a further version incorporating the Panel advisor's review (May 2026) – with the most recent version produced only days before comments are due (Bream Bay Sand Extraction Project Expert Panel, minute 9, 2026, p. 2).

These incidents and fluidity suggests the applicant's original proposal was materially incomplete and undermines public confidence in the applicant's ability to provide accurate and settled information for a 35-year extraction operation.

5.2 Cultural Significance

Te Ākau Bream Bay holds deep cultural significance for tangata whenua and has sustained generations of coastal communities through customary harvest, travel and cultural practice. Te Ākau Bream Bay is described as *"culturally, ecologically, spiritually and economically significant"* to Patuharakeke who have conducted the first dedicated scientific survey of the area's marine megafauna — explicitly identifying proposed seabed mining as a threat requiring careful assessment given the area's importance for nationally threatened species (Brough et al., 2025).

The area forms part of a wider cultural landscape extending across Whangārei Heads, Bream Head / Te Whara and the eastern Northland coastline.

The proposal has generated strong concern among hapū regarding the degradation of culturally significant marine environments, burial sites and impacts on customary relationships with the moana. (Brough et al., 2025)

Iwi were invited to prepare a plan before extraction, however only 15 working days were allowed - manifestly inadequate for meaningful cultural planning. The Applicant has not yet secured genuine iwi support, and the consent may proceed without proper cultural protocols (Fast-Track Panel, 2026b).

Iwi are cultural experts and are obligated to prepare extensive evidence about cultural and social effects to fill the gaps of an incomplete application. Additionally few hapū / iwi from Te Tai Tokerau have settled claims with the crown, thus creating uncertainty around representation and accountability in environmental decision-making. As per the Port of Tauranga Fast Track case, costs could be incurred if the proposal is not accepted (RNZ, 2025a).

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6. Cumulative Effects and Future Development

6.1 Northport Expansion and Industrialisation

The proposed sand mining operation cannot be assessed in isolation. This consent asks for 35 years of extraction, however, offers three years of monitoring before dramatically increasing the take. Irreversible degradation of the seabed, sand, beach, and ecosystem may occur before the full scale of the damage is understood.

Nearby, Northport has already received approvals for major expansion activities including container handling and associated infrastructure (Environment Court of NZ, 2025). These developments involve dredging, reclamation and substantial changes to coastal processes. McCallum Bros proposal does not consider or reference how these combined projects with long-term industrial activity and vessel traffic will impact the marine and surrounding environments.

The combined chronic noise of dredging both in the bay and in the harbour over 35 years may drive many animals away. The noise limit for both proposals are poorly defined and likely too high for sensitive receivers (iwi, residents, wildlife). No cumulative baseline soundscape has been established.

Peer-reviewed research on bottom trawling demonstrates that disturbing the seafloor can release up to 370 million metric tons of CO_2 annually and impose social costs 90 times greater than industry profits (Frontiers in Marine Science, 2023).v Equivalent knowledge gaps for marine sand mining mean that the full climate cost of the proposal remains unquantified, undermining any claim of net environmental benefit.

Additional proposals involving Channel Infrastructure and other marine development activities include:

- 11.7 hectares of reclamation and associated coastal structures for a 250-metre wharf extension
- 1.72 million cubic metres of capital dredging and associated disposal
- Ongoing maintenance dredging
- Riparian earthworks

- Associated stormwater diversions and discharges
- Operational stormwater discharges from use of the reclamation area

Community groups and hapū have repeatedly raised concerns regarding “death by a thousand cuts” - where individually consented activities collectively produce major long-term ecological degradation.

The WHCA is concerned that:

- The cumulative effects of multiple developments have not been adequately assessed
- Monitoring responsibilities remain unclear
- The marine environment may progressively decline through incremental approvals
- Severe knowledge gaps persist regarding the biodiversity and carbon footprint of marine sand mining, transportation, and consumption (Torres et al., 2025v).
- Long-term accountability mechanisms are insufficient, questions remain about who would ultimately fund remediation, restoration, monitoring, or adaptive management should significant adverse effects occur in the future.

The Supreme Court decision in Trans-Tasman Resources Ltd v Taranaki-Whanganui Conservation Board is particularly relevant to the proposed Te Ākau / Bream Bay sand extraction project, as it emphasised the need for decision-makers to fully grapple with the long-term and cumulative effects of seabed mining proposals on marine environments and tangata whenua relationships with the moana. (Trans-Tasman Resources Limited v Taranaki-Whanganui Conservation Board, 2021)

Sand mining adds an unsustainable "layer of pressure" to these stressed ecosystems. A precautionary approach is warranted where uncertainty exists.

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7. Economic Considerations

7.1 Limited Benefit to Northland

Regional benefit is a requirement of the fast-track law. This project fails the most basic test of the Fast-Track Act. The economic justification for the proposed Bream Bay sand extraction project remains highly contested. The project is viewed as an extraction of Northland’s natural resources for Auckland’s financial gain. Northland carries all the ecological, economic and environmental risk while Auckland receives the material for construction.

Hayden Green, an independent economist with over twenty years of experience, reviewed the applicant's cost-benefit assessment and concluded that it is "manifestly inadequate and demonstrably flawed" (Green, 2025). Green notes that the applicant's

analysis wrongly assumes that without Bream Bay sand, all supply would come from the Kaipara Harbour, dismissing viable land-based alternatives such as manufactured sand. If the correct counterfactual were applied, Green states, the applicant's "entire analysis would collapse completely. Given these deficiencies, I fail to see how the adjudicating panel could reasonably conclude that the proposal should be approved".

Whangārei District Council unanimously opposed the proposal, citing a lack of clear evidence of significant local economic benefit. Independent economic analysis has criticised the applicant's assessment as overstating benefits while understating costs. Furthermore, evidence commissioned by community groups and references to the BECA review indicate that substantial alternative sand supplies already exist through land-based and manufactured sources, undermining claims that marine extraction is necessary to meet regional demand (Beca, 2025).

Dredged sand is not essential for concrete. Advances in quarry technology now produce high quality engineered sand that is both sustainable and commercially viable (Kayasand, 2025). For example, when the Environment Court reduced MBL's permitted extraction at Mangawhai-Pakiri, Brookby Quarry was able to enter the market with manufactured sand (Endangered Species Foundation, 2025a).

The proposal therefore raises questions regarding:

- Intergenerational equity
- Distribution of economic benefits and environmental costs
- Sustainability of extractive marine industries
- Whether alternative supply options have been adequately explored

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8. Community Stewardship and Intergenerational Responsibility

Decisions about resource extraction must not just consider immediate economic benefits, but the full spectrum of environmental, cultural and social impacts over time.

Across Whangārei Heads and wider Northland, thousands of volunteer hours are invested each year into ecological restoration, pest control, biodiversity protection and environmental education.

Many community members are actively working to restore ecosystems previously damaged through historic deforestation and unsustainable land use.

The proposed sand mining operation is fundamentally inconsistent with these restoration efforts - it would extract a non-renewable resource from a recovering ecosystem, for the benefit of an Auckland construction market, while leaving Northland communities to manage the consequences.

Long term ramifications to marine ecosystems, coastal communities, tourism, and climate change are unknown. Community members are concerned not only about present-day impacts, but about the legacy left for future generations. 35 years is a long time, attitudes towards the environment have changed a lot and advocacy and awareness towards preserving the natural environment is increasing.

Questions repeatedly raised include:

- Who bears responsibility if environmental damage occurs? For a 35-year consent in a non-renewable sand system, the question of who bears long-term responsibility is not abstract - it is the central issue.
- Who funds restoration if adverse effects emerge decades later? The consent as proposed contains no binding remediation bond or clear liability mechanism.
- What restrictions and/or limitations will be placed on recreational fishing, activities, when sand being extracted? The application documentation itself acknowledges that recreational fishers, small vessels, and kayakers currently utilise the extraction area (McCallum Bros Limited, 2025).
- What environmental condition will future generations inherit? A consent granted today will still be operating in 2061. The communities of Te Ākau / Bream Bay - their children and grandchildren - will live with the consequences of this decision long after the applicant has extracted its material and moved on.

While McCallum Bros have offered Augier basis contributions to the council, iwi and communities, these payments are framed as voluntary offerings, not binding mitigation for environmental harm. They cannot be enforced if damage emerges, and cannot restore a degraded seabed, an eroded beach, or a collapsed fishery, nor should they be used to buy social licence. This token payment cannot compensate for the real economic harm to tourism, property values, and the community's way of life.

The moana is widely viewed not simply as a resource, but as a shared inheritance carrying ecological, cultural and social value.

The WHCA has - and continues to - work closely with the Bream Bay Guardian Society and would like to acknowledge the work/independent reports BBGS have commissioned. Further information is available at https://savebreambaysand.org/

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9. Conclusion

The WHCA submits that the proposed marine sand extraction project presents significant environmental, cultural, social and intergenerational risks.

Key concerns include:

- Irreversible impacts on marine ecosystems
- Potential coastal erosion and sediment disruption

- Impacts on shellfish, fisheries and marine mammals
- Effects on customary rights and cultural relationships with the moana
- Cumulative impacts alongside Northport expansion and future industrial development
- Limited economic benefit to Northland communities
- Insufficient certainty regarding long-term environmental outcomes

This proposal is not opposed by a small group of activists. It is families, councillors, iwi, mayors, surf clubs, and thousands of ordinary Northlanders. The community is united, creative, and determined. That unity should tell the consenting panel everything it needs to know.

Scientifically, the project threatens protected corals and critically endangered birds while disrupting a non-renewable sand system. Socially, it lacks a mandate, would not benefit the Whangārei region, and is proposed by an applicant with a poor compliance record. We recommend the rejection of this application to protect the ecological integrity and mauri of Te Ākau Bream Bay.

The WHCA respectfully requests that the Expert Panel adopt a precautionary approach and decline the application.

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Appendices

- Appendix A: McCallum Bros Proposed Mining Area
- Appendix B: Copy Petition Action Station by Brenda Leeuwenberg
- Appendix C: BBGS Presentation NRC 22 Apr 2025
- Appendix D: Presentation Petition WDC Council Meeting 29 April 2025
- Appendix E: Presentation BBGS WDC Council Meeting 18 December 2025
- Appendix F: Appendix F Post-Meeting Minutes - WDC 18 December 2025
- Appendix G: Key findings of survey of public opinions about the proposal by McCallum Brothers to mine marine sand in Te Ākau Bream Bay. Conducted by the Bream Bay Guardians Society.
- Appendix H: Key verbatims of survey conducted by the Bream Bay Guardians Society.
- Appendix I: WDC Candidates responses to sand mining
- Appendix J: NZ Birds Online - Bream Bay Whangarei