

Before the Expert Fast-track Panel

FTAA-2511-1150

Under the Fast-track Approvals Act 2024 (**FTAA**)

And

In the Matter of an application for approvals by **MCCALLUM BROTHERS LIMITED** for the Te Ākau Bream Bay Sand Extraction Project located at Te Ākau Bream Bay, Northland

**Evidence of Callum Fraser McCallum on behalf of McCallum Brothers Limited in
Response to Invited Comments**

(Corporate and Engagement)

Dated 12 August 2026

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Introduction

1. My name is Callum Fraser McCallum.
2. I am the Managing Director of McCallum Bros. Ltd. I hold a Bachelor of Agriculture Science as well as a Skipper Restricted Limits (<500T) maritime ticket.
3. I have 20 years' experience as Director of McCallum Bros. Ltd. I am the fourth generation of McCallum's to be involved in our family business which was started by my Great Grandfather in the 1800's and first registered in 1904. I was brought up working on the tugs and barges with my father and his brothers. This included working on vessels extracting sand in the Mangawhai – Pākiri embayment since the 1980's, and other voyages throughout the Hauraki Gulf.
4. I became Managing Director in 2014.
5. I also established Pakihi Marine Farms Limited (trading as Clevedon Coast Oysters) (**CCO**), NZ's premier Pacific Oyster brand employing 50+ staff with oyster farms in the Northland and Auckland regions, growing, processing and marketing oysters in New Zealand and globally.
6. CCO entered in a joint venture partnership with local iwi Ngāi Tai ki Tamaki (**Ngāi Tai**) which developed a large new oyster farm which will have the potential to double production of CCO and equally result in substantial financial, social and other benefits to Ngāi Tai members in the future.
7. This evidence is provided as part of McCallum Brothers Limited's (**MBL**) response to comments made through the invited submission process on the Te Ākau Bream Bay Sand Extraction Project (**Project**). In particular I wish to respond and address concerns raised by tangata whenua, iwi, hapū and wider whanau who have been invited to comment on MBL's substantive application.

8. My evidence focuses on concerns and issues identified by tangata whenua, iwi, hapū and wider whanau, and how MBL have responded/addressed these matters in the supporting technical effects assessments included as attachments to the substantive application and recent RFI submissions in response to the Expert Consenting Panel (Panel).
9. Consultation with tangata whenua, iwi, hapū and wider whanau is an integral part of the Project, not only to satisfy requirements in the FTAA, but to ensure that the proposed Project considers and minimises cultural impacts and that iwi/hapū can benefit from the Project for future generations.
10. As the Managing Director of the McCallum Group, I cannot provide independent expert evidence. Nonetheless, to the extent possible, I confirm (acknowledging this is not a hearing before the Environment Court), that:
 - a. I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses as specified in the Environment Court's Practice Note 2023 (Code); and
 - b. Any reports and other relevant documents referred to as authored by me:
 - i. Are within my area of expertise (except where I state that I rely upon the technical reports of other expert witnesses provided in support of the application); and
 - ii. Have been prepared in accordance with the Code
11. I have not omitted to consider any material facts known to me that might alter or detract from the opinions expressed.

Scope of Evidence

12. This evidence is provided in response to comments from tangata whenua and other parties in relation to the Project. In particular, I will respond to the following comments:

a. Patuharakeke Te Iwi Trust Board (CIA Clean) document:

I. Section 7.1.2, Appendix 1.1 that “The overarching recommendation to re-locate outside of, and away from, Te Ākau Bream Bay is viewed by Patuharakeke as the most appropriate approach to achieve the objectives of the cultural impact assessment framework, and more importantly, avoid harm to Patuharakeke. This recommendation is still preferred by Patuharakeke.”

II. Section 6.4.3 Rangatiritanga/Mana Moana 5. Poor Consultation with Patuharakeke Te Iwi Trust (CIA Clean) document.

III. Patuharakeke Impact Assessment statements. Adverse Cultural Impact #5- Poor Consultation with Patuharakeke Te Iwi Trust p67. 6.2.56 - 6.2.58.

b. Te Iwitahi Manihera Whānau (24a/b – Statement of Evidence / BoE)) McCallum Brothers Ltd (MBL) have not meaningfully engaged with the rightful and evidenced Tangata Whenua Tangata Moana to the Application area, of Bream Bay Te Akau, and consider the consultation process was deficient.

c. Hapū o Te Waiariki, Ngāti Korora, Ngāti Takapari : no meaningful consultation process.

d. Waipū Boat & Fishing Club on Page 3 of their comments where they state "Now, having lost at Pākiri, MBL has simply moved north to Bream Bay".

13. There are also a range of concerns in submissions made by tangata whenua, iwi, hapū and wider whānau.
14. My evidence also responds to comments in their submissions on the Project from the following groups:
- a. Patuharakeke Te Iwi Trust Board & Ngātiwai Trust Board;
 - b. Te Ohu Kaimoana (Māori Fisheries Trust);
 - c. Te Rerenga Parāoa Rohe Moana Kaitiaki;
 - d. Te Iwitahi Manihera Whānau (24b – Statement of Evidence / BoE);
 - e. Te Parawhau ki Tai (MAC-01-01-137) / Marina Fletcher;
 - f. Kōwhai Te Awhina Hapū o Te Parawhau Hapū Incorporation;
 - g. Hapū o Te Waiariki, Ngāti Korora, Ngāti Takapari;
 - h. Te Kauika o Patuharakeke Waka Ama Incorporated;
 - i. Takahiwai Māori Committee;
 - j. Parihaka Waka Ama Club Inc; and
 - k. Te Iwitahi Manihera Whānau (24a – correspondence).
15. A tabulated summary is included in **Appendix 1** regarding all comments received where concerns and issues identified by commenters are cross-referenced to the relevant attachment and section numbers in MBL’s substantive application, including MBL’s recent RFI responses and submissions. This material is intended to direct and assist the Panel to the various parts of the substantive application where a number of the concerns and issues are addressed, rather than repeat them, for the sake of brevity.

16. In addressing the comments identified in Paragraphs 12 to 14, I shall cover the following matters:

- a. Why MBL Chose Te Ākau Bream Bay;
- b. Initial investigations;
- c. Discovery of the offshore sand resource;
- d. Engagement with Northport and Channel Infrastructure;
- e. Refinement of the extraction area;
- f. Consultation with tangata whenua;
- g. Progressive refinement through expert advice;
- h. Existing use of Bream Bay;
- i. Existing condition of the seabed;
- j. Strategic advantages of the Bream Bay resource;
- k. Marine and Coastal Area (Takutai Moana) Applicants;
- l. Patuharakeke Te Iwi Trust Board;
- m. Te Pouwhenua o Tiakiriri Kukupa Trust (Te Parawhau ki Tai);
- n. Ngātiwai Trust Board;
- o. Other consultations;
- p. Response to Comments from Tangata Whenua; and
- q. Appendix 1 - Tangata Whenua Issues and Responses Register.

Executive Summary

17. MBL selected Te Ākau Bream Bay following a staged process of technical investigations, environmental assessment, consultation with tangata whenua, engagement with key infrastructure operators, and independent expert advice. Alternative locations, including the Whangārei Harbour capital dredging area and the offshore anchorage, were investigated but discounted due to unsuitable sand quality, operational constraints, environmental considerations, or existing consent limitations. The proposed extraction area was progressively refined to avoid operational risks, respond to tangata whenua feedback where practicable, and incorporate expert recommendations that minimise environmental effects through adaptive management, comprehensive monitoring, and operational controls. MBL considers the proposed location provides the best overall balance of high-quality sand, long-term resource security, efficient marine logistics, operational practicality, and environmental outcomes, while supporting the future supply of concrete-grade sand for the upper North Island.
18. MBL have engaged and consulted widely with iwi, hapū, local tangata whenua and whānau since the inception of the Project in 2024. A record of all consultation is included in **Attachment 5 – Consultation Summary**, while post-lodgement engagement is addressed in Mr Davis' evidence in response to **Minute 4 (RFI 1)**.
19. All statements included in this evidence are to the best of my knowledge.

Why MBL Chose Te Ākau Bream Bay

20. One of the questions raised by submitters is why MBL selected Te Ākau Bream Bay as the location for the Project. Both Patuharakeke and the Waipū Boat & Fishing Club have questioned why MBL has proposed Te Ākau Bream Bay for marine sand extraction. Patuharakeke state in Section 7.1.2 of their Final Cultural Impact Assessment that their preferred outcome is for the proposal to be relocated outside of, and

away from, Te Ākau Bream Bay. Similarly, the Waipū Boat & Fishing Club suggests that in Page 3 of their comments, having been unsuccessful at Pākiri, MBL has simply moved north to Bream Bay.

21. That characterisation does not accurately reflect how the proposed extraction area was identified. Te Ākau Bream Bay was not selected at the outset as an alternative to Pākiri. Rather, it emerged following a staged process of technical investigations, environmental assessment, engagement with industry and infrastructure operators, consultation with tangata whenua, and advice from independent experts. Throughout that process, the proposed extraction area was progressively refined to identify the location that best balanced resource quality, operational practicality, environmental outcomes and long-term supply needs.
22. MBL also took into consideration the area gazetted as Patuharakeke's Mahinga Rohe Moana and Mātaitai Reserve Application Areas to ensure the proposed sand extraction area did not occur within these areas, as Patuharakeke had indicated in our first meeting that the hapu was unlikely to support the application. (See Figures 1 to 4).
23. The detailed technical basis for selecting the proposed extraction area, including resource quality, operational constraints, environmental effects and long-term supply considerations, is addressed in:

The Assessment of Environmental Effects including:

- Attachment 7 – Assessment of Landscape and Natural Character Effects (Brown NZ Ltd)
- Attachment 8 – Assessment of Coastal Process Effects (Tonkin + Taylor)
- Attachment 10 – Assessment of Airborne Noise Effects (Styles Group)

- Attachment 12 - Assessment of Benthic Ecology Effects (Bioresearches)
- Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd)
- Attachment 17 – Assessment of Surf Break Effects (Metocean Solutions)
- Attachment 18 – Assessment of Economic Effects (Lawrence McIlrath)
- Attachment 19 - Assessment of Navigational Safety Effects (B Goodchild)
- Attachment 20 – Concrete Suitability Statement (Paul Donoghue)

24. Prior to identifying the proposed extraction area, MBL broadly investigated a range of potential marine sand resources throughout the upper North Island, including Manukau Harbour, Kaipara Harbour, Whangārei Harbour and other east coast locations. Those alternatives were progressively discounted due to resource quality, environmental, operational, infrastructure or consenting constraints.

25. MBL then investigated the existing Channel Infrastructure capital dredging area within the Whangārei Harbour approach channel. Those investigations demonstrated that while some areas of the outer channel did have suitable sand, much of the main channel areas largely comprised of coarse shell material containing extensive numbers of live shellfish, particularly various species of cockles. Based on MBL's extensive experience extracting marine sand for concrete manufacture, the material was largely considered unsuitable due to the benthic biota presence and the very high shell content. Further to that there are various other reasons why the resource is not operationally workable as outlined in the response of Shayne Elstob to Minute 5 of the Panel (RFI 2), paragraphs 24 to 26.

26. MBL undertook further investigations offshore in Bream Bay. Those investigations identified a substantial high-quality marine sand resource, which was subsequently refined to avoid operational constraints and minimise environmental effects. The detailed assessment of those investigations and the reasons for selecting the proposed extraction area are addressed in the documents identified above.

Consultation with Tangata Whenua

27. Before undertaking detailed project development, MBL sought advice from Tai Tokerau kaumātua and Ngāti Whātua Senior Adviser, Tame Te Rangi regarding the appropriate tangata whenua engagement process.
28. Consistent with that advice, MBL first engaged with Ngātiwai, with whom it had an existing relationship through its long-standing Pākiri operations and based on the requirement of its Memorandum of Understanding for offshore extraction at Pakiri which required MBL to consult with Ngāti Wai on any potential developments by MBL in the rohe of Ngāti Wai.
29. MBL subsequently engaged extensively with Patuharakeke Te Iwi Trust Board and Te Parawhau ki Tai, who were identified by Ngātiwai and the NRC as the principal hapū with interests in the proposed project area.
30. That engagement continued throughout development of the Project and informed the refinement of the proposal, management measures and consent framework. The consultation undertaken is comprehensively documented in **Attachment 5 – Consultation Summary**, with post-lodgement engagement addressed in **Mr Davis's evidence in response to Minute 4 (RFI 1)**.

Progressive Refinement Through Expert Advice

31. As investigations progressed, MBL commissioned a comprehensive suite of independent technical assessments including coastal processes, benthic ecology, fisheries, marine mammals, seabirds, underwater and

airborne noise, water quality, navigation, landscape, economics and cultural values.

32. The detailed technical basis for selecting the proposed extraction area included consideration of resource quality, operational constraints, environmental effects and long-term supply considerations, and is addressed in the Assessment of Environmental Effects, the specialist technical reports and the subsequent expert evidence, including:

- **Attachment 8 – Assessment of Coastal Process Effects** (Tonkin + Taylor)
- **Attachment 9 – Assessment of Water Quality Effects** (SLR Consulting)
- **Attachment 12 – Assessment of Benthic Ecology Effects** (Bioresearches)
- **Attachment 14 – Assessment of Marine Mammal Effects** (SLR Consulting)
- **Attachment 16 – Assessment of Fish and Fisheries Effects** (Richard Boyd – Fisheries Scientist)
- **Attachment 18 – Assessment of Economic Effects** (m.e. Consulting)
- **Attachment 19 – Assessment of Navigational Safety Effects** (Northland Regional Council Harbourmaster)
- **Attachment 20 – Concrete Suitability Statement** (Concreteman Consulting)
- **The reply evidence of Simon West**, responding to comments on benthic ecology, habitat recovery and cumulative effects.
- **The reply evidence of Richard Boyd**, responding to comments on fisheries, customary fishing and marine activity.

- **The reply evidence of Lawrence McIlrath**, responding to comments on economic need, alternative sand supplies and market demand.
- **The reply evidence of Paul Donoghue**, responding to comments on concrete suitability and manufactured sand.
- **The reply evidence of Dr Matthew Pine**, responding to comments on underwater noise and marine mammals.
- **The reply evidence of Dr Jennifer Beaumont**, responding to comments on Scleractinian cup corals.

Existing use of Bream Bay

33. Bream Bay is an established working marine environment, with regular commercial shipping, fishing and port-related activity. That existing use was one of the factors considered by MBL in selecting and refining the proposed extraction area. The existing maritime environment and navigational effects of the proposal are comprehensively assessed in **Attachment 19 – Assessment of Navigational Safety Effects (Bruce Goodchild)**.

Existing Condition of the Seabed

34. MBL also considered the characteristics and condition of the seabed when refining the proposed extraction area. The nature of the seabed, existing benthic habitat, historical commercial fishing activity and the implications of that history for the assessment of environmental effects are comprehensively addressed in **Attachment 12 – Assessment of Benthic Ecology Effects (Simon West)**, **Attachment 16 – Assessment of Fish and Fisheries Effects (Richard Boyd)**, and their respective reply evidence.

Strategic Advantages of the Bream Bay Resource

35. In addition to the environmental and operational considerations described above, MBL considered the proposed resource to offer significant strategic advantages, including the availability of a substantial long-term source of high-quality concrete sand and efficient marine access to the principal construction markets of the upper North Island. The suitability of the resource, its long-term supply potential and the economic and logistical benefits of the Project are comprehensively assessed in **Attachment 18 – Assessment of Economic Effects** (Lawrence McIlrath) and Lawrence’s reply evidence, as well as **Attachment 20 – Concrete Suitability Statement** (Paul Donoghue) and Paul’s responses to Minute 4 (RFI1) and Minute 5 (RFI2).

Marine and Coastal Area (Takutai Moana) Applicants

36. MBL has taken advice on and made every effort to comply with the consultation and notification requirements of the Fast-track Approvals Act 2024 in relation to Marine and Coastal Area (Takutai Moana) applicants. Consistent with advice received from the Northland Regional Council, MBL identified and consulted the 24 relevant MACA applicants, including direct engagement with Te Parawhau ki Tai, Patuharakeke Te Iwi Trust Board, and Ngātiwai Trust Board.
37. The consultation undertaken, including correspondence with all identified MACA applicants and the responses received, is comprehensively documented in Attachment 5 – Consultation Summary, particularly Sections 5A(ii) and 5D. I also refer the Panel to Mr Davis's evidence in response to Minute 4 (RFI 1), which explains the advice received from Northland Regional Council regarding the appropriate tangata whenua and tangata moana groups to engage.

Patuharakeke Te Iwi Trust Board

38. I respond to the concerns raised by Patuharakeke Te Iwi Trust Board in **Appendix 11.1 (Patuharakeke CIA)** regarding consultation and

engagement. In my view, MBL provided Patuharakeke with extensive opportunities to participate throughout the development of the Project, including regular meetings, technical workshops, site visits, circulation of draft technical reports, draft management plans, draft consent conditions, and opportunities to provide feedback throughout the pre-lodgement process.

39. The consultation undertaken is comprehensively documented in **Attachment 5 - Consultation Summary** and **Mr Davis's evidence in response to Minute 4 (RFI 1)**. Those documents record the consultation programme, meetings, correspondence and opportunities provided to Patuharakeke from February 2024 onwards.
40. Throughout that engagement, MBL incorporated information provided by Patuharakeke during the development of the Project and refined aspects of the proposal accordingly. This included consideration of the areas identified by Patuharakeke in its various statutory applications, planning documents and management plans when refining the location of the proposed extraction area. Each of these, shown in Figures 1 to 4 below, are inshore of (not within) the proposed Bream Bay sand extraction area. The cultural values of the wider Te Ākau Bream Bay area and the assessment of those values are addressed in **Attachment 7 – Assessment of Landscape and Natural Character Effects**, the relevant **Cultural Impact Assessments (Attachments 22–24)**, and the proposed cultural management framework contained in the **Recommended Consent Conditions (Attachment 26)**.
41. MBL also provided Patuharakeke with the opportunity to participate in field investigations and technical discussions, including attendance at monitoring activities and site visits.
42. Members of the Patuharakeke Environment team were also present on the *William Fraser* during extraction at Pākiri, so saw first-hand the sand extraction operation.
43. MBL has continued to provide updated application material and proposed consent conditions as the Project has evolved, including the

draft Cultural Impact Assessment being lodged with the application and the proposed cultural contribution and cultural management provisions contained in **Attachment 26 – Recommended Resource Consent Conditions**.

Customary Marine Title

- 2.2.8 The MACA Act explains⁸ customary marine title as the recognition of the customary interests of an applicant group for a specified area in the common marine and coastal area in accordance with their tikanga, and exclusively used and occupied by the applicant group since 1840 (without interruption).
- 2.2.9 The map⁹ lodged with the application is below:



Figure 1: Patuharakeke Customary Marine Title (MACA) application area. (In Whangārei Harbour, not Te Akāu Bream Bay.)

2.2.13 The map¹³ below provides an illustration/outline of the specified area for the application:



Figure 2: Patuharakeke Protected Customary Rights application area. (Application area to the west of the proposed sand extraction area)

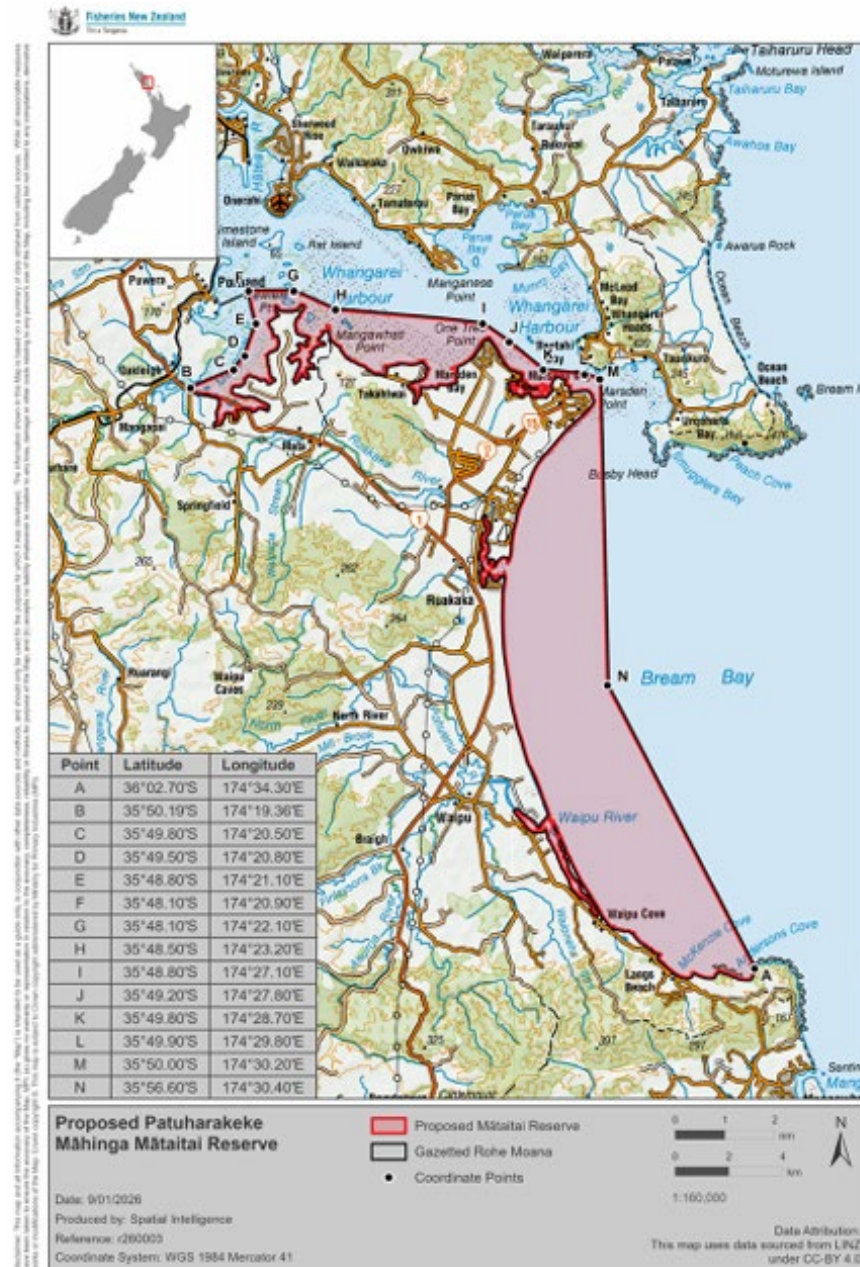


Figure 1. Map of Proposed Patuharakeke Mahinga Mātaitai Reserve.

Figure 3: Patuharakeke Mahinga Rohe Moana and Mātaitai Reserve Application
 (Source MPI Fisheries Management Spatial Allocations Notice, 9th July, 2026.)
 (Application area to the west of the proposed sand extraction area)

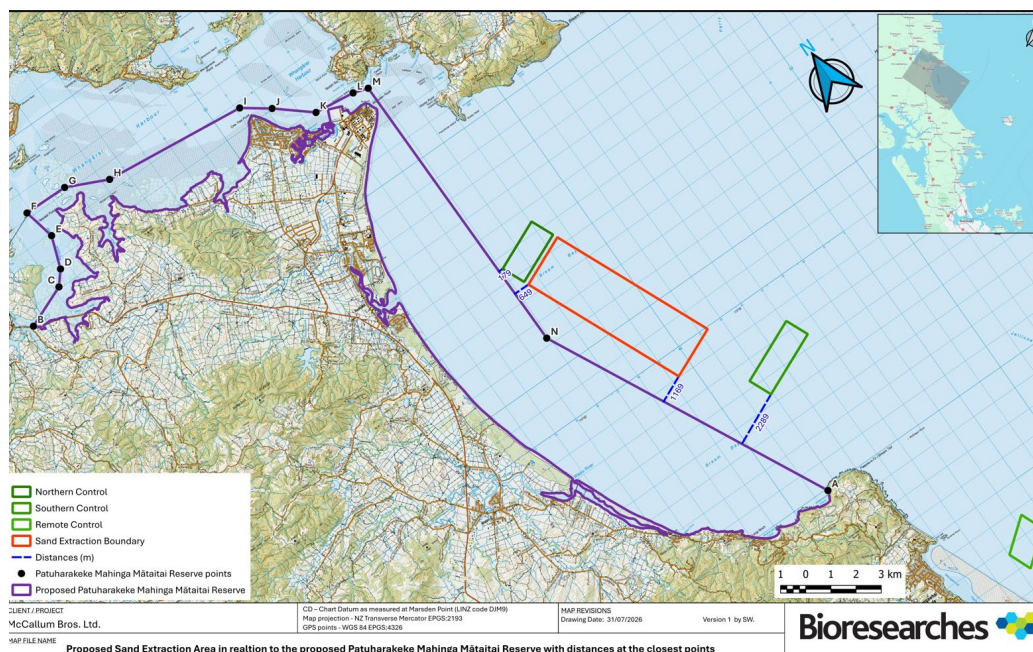


Figure 4: Position of the Patuharakeke Mahinga Rohe Moana and Mātaitai Reserve Application Areas in relation to Proposed Sand Extraction area.

Te Pouwhenua o Tiakiriri Kukupa Trust (Te Parawhau ki Tai)

44. MBL commenced engagement with **Te Parawhau ki Tai** in May 2024 and maintained regular engagement throughout the development of the Project, including meetings, technical workshops, hapū presentations and site visits. Importantly to MBL, the rohe Moana of Te Parawhau appeared to include MBL's proposed sand extraction site, as shown in Figure 5 below.
45. Te Parawhau ki Tai was afforded the same opportunities as Patuharakeke to engage directly with MBL and the Project experts. The consultation undertaken is comprehensively documented in **Attachment 5 – Consultation Summary**, and I do not repeat that chronology here.
46. That engagement resulted in a **Relationship Agreement** and subsequently the **Substantive Agreement**, which establishes a comprehensive framework for ongoing collaboration, cultural participation, environmental monitoring, Mātauranga Māori

integration, cultural contributions and other initiatives over the life of the Project.

47. The terms of those agreements are set out in **Attachment 22 (Appendix A) – Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum**, together with the relevant agreements which explain the basis upon which Te Parawhau ki Tai has provided conditional support for the Project, including its view that the proposal, together with the commitments secured through the Substantive Agreement, can deliver environmental, cultural, social and economic benefits for the hapū while supporting the restoration and protection of the mauri of **Paepae Atua**.

48. Those matters are also reflected in the **Te Pouwhenua o Tiakiriri Kūkupa Trust Cultural Impact Assessment (Attachment 22)**, which supports the application subject to the ongoing implementation of the agreed cultural management, monitoring and mahi whakaora initiatives.

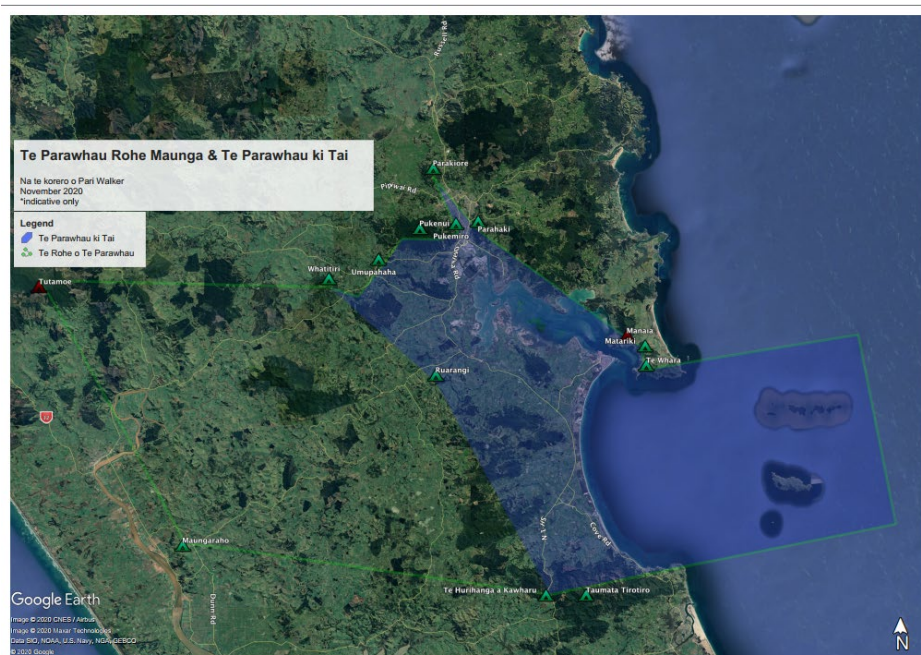


Figure 5. Te Parawhau Rohe Maunga & Te Parawhau ki Tai (Source: Pari Walker)

Ngātiwai Trust Board

49. MBL has had an established relationship with Ngātiwai Trust Board since the early 2000's through the offshore Pākiri sand extraction operation, including an inherited relationship agreement and Memorandum of Understanding which contemplated collaboration and required notification to Ngātiwai on any future commercial activities within the Ngātiwai rohe.
50. Consistent with that relationship, MBL engaged with Ngātiwai during the development of the Project and provided draft technical assessments, management plans and proposed consent conditions for review. MBL also met with Ngātiwai representatives on several occasions, presented the Project, sought feedback, and provided further information as requested. The consultation undertaken is comprehensively documented in **Attachment 5 – Consultation Summary**, and I do not repeat that chronology here.
51. Ngātiwai subsequently prepared a **Cultural Impact Assessment (Attachment 24)** opposing the Project. MBL has continued to provide Ngātiwai with updated application material and proposed consent conditions as the Project has evolved; however, to the best of my knowledge, no further substantive feedback has been received following the provision of that CIA.

Other consultations

52. MBL also consulted with the Ministry for Primary Industries (MPI) to determine whether the Project area was subject to any taiāpure-local fisheries, mātaimai reserves, or other customary fisheries management measures under the Fisheries Act 1996. MPI confirmed that there are no established taiāpure-local fisheries or mātaimai reserves within the proposed Sand Extraction Area or Control Areas, and that no associated fisheries regulations or bylaws apply.

Response to Comments from Tangata Whenua

53. In response to the comments received from invited persons on MBL's substantive application, especially tangata whenua, iwi, hapu and whanau a table has been prepared which is included in **Appendix 1**. This references the specific attachment number and section where MBL has considered various matters raised by tangata whenua within MBL's expert reports and also the responses of MBL's experts to the RFI submissions.

Conclusion

54. This evidence responds to comments regarding MBL's selection of the proposed extraction area and its consultation with tangata whenua.

55. As explained above, MBL selected the proposed extraction area following consideration of alternative locations and extensive technical investigations. The proposal was progressively refined through independent expert advice, engagement with infrastructure operators, and consultation with tangata whenua to achieve an appropriate balance between resource quality, operational practicality, environmental outcomes and long-term supply. I refer the Panel to the specialist technical evidence and the Assessment of Environmental Effects for the detailed basis of those conclusions.

56. MBL has undertaken extensive consultation with tangata whenua throughout the development of the Project, including the principal hapū's and Ngātiwai as having interests in the Project area. That consultation, together with the responses received and subsequent engagement, is comprehensively documented in **Attachment 5 - Consultation Summary** and **Mr Davis's evidence in response to Minute 4 (RFI 1)**.

57. MBL and its technical experts have carefully considered the matters raised through Cultural Impact Assessments, correspondence and invited submissions. Rather than repeating that material, **Appendix 1** to

my evidence cross-references each concern to the relevant technical assessments, management plans, consent conditions, RFI responses and expert evidence where those matters are addressed.

58. MBL remains committed to working constructively with tangata whenua throughout the life of the Project. That commitment is reflected in the proposed consent conditions, cultural management framework, and the agreements reached with **Te Parawhau ki Tai**, including the ongoing implementation of agreed cultural monitoring and **mahi whakaora** initiatives.

Callum Fraser McCallum

12 August 2026

Appendix 1 – Tangata Whenua Issues and Responses Register

Party	Concern Raised	How / Where Addressed by Applicant in Application	Key Attachments / Management Plans	Response to Comments
Patuharakeke Te Iwi Trust Board & Ngātiwai Trust Board	Adverse effects on rangatiratanga, mana moana and kaitiakitanga	Addressed through Attachment 22 – Cultural Impact Assessment (Te Pouwhenua o Tiakiriri Kūkupa Trust) and the Joint Memorandum between Te Parawhau ki Tai and McCallum Bros (Attachment 22 Appendix A). The Environmental Monitoring Management Plan (Attachment 29) provides for ongoing tangata whenua (Te Parawhau ki Tai at this stage) participation through review of PSEARs and SEMRs, inclusion of hapū-led monitoring information, consideration of mātauranga Māori indicators of mauri, consultation on EMMP reviews. Recommended consent conditions also require ongoing engagement, implementation of the Mahere Tikanga Plan, and cultural monitoring processes.	Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust) Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	The EMMP (in Sections 2.2 (EMMP Review Methodology), 5.8 (Written Deliverables (for the PSEAR)) and 6.13 (Written Deliverables) (for the SEMR))) and recommended Conditions 22 and 37 provides a pathway for Te Parawhau ki Tai participation through reviews of the draft PSEAR's and SEMR's. MBL remains open to this being extended to other key iwi/hapu representatives
Patuharakeke Te Iwi Trust Board & Ngātiwai Trust Board	Effects on customary fishing and kaimoana resources	Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd), Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches), Attachment 9 – Assessment of Water Quality Effects (SLR) and the relevant Cultural Impact Assessments, the EMMP (Attachment 29).	Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd) Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches) Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	Rick Boyd statement of evidence in response to comments from invited persons responds to concerns regarding recreational fishing, fisheries productivity, fish abundance and fishing values, concluding population-level effects are unlikely. Simon West statement of evidence in response to comments from invited persons confirms benthic prey resources, shell habitats and ecological indicators will be monitored through the updated EMMP. The updated EMMP (Attachment 29) establishes ongoing monitoring of benthic communities, sediment characteristics, benthic prey resources, scallops and other key ecological indicators, with trigger levels requiring investigation, increased monitoring, management responses, or exclusion of extraction cells if adverse trends are detected.
Patuharakeke Te Iwi Trust Board & Ngātiwai Trust Board	Scallop recovery and rāhui concerns	Addressed through Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches), Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd), the EMMP (Attachment 29).	Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026), Sections 6.10 and Appendix F Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches) Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd)	Simon West directly addresses scallop recovery concerns and confirms the EMMP contains recovery monitoring, control-site comparisons, adaptive management triggers and the ability to close cells or modify extraction if recovery is not occurring as predicted. The updated EMMP (Attachment 29) specifically requires monitoring and reporting of scallop density, size classes, recovery trends and benthic habitat condition. The adaptive management framework includes trigger, increased monitoring and action response levels, with the ability to restrict extraction, close cells, extend recovery periods, or modify operations if monitoring identifies adverse ecological trajectories affecting scallops or associated habitats.

				Legal memorandum.
Patuharakeke Te Iwi Trust Board & Ngātiwai Trust Board	Benthic habitat disturbance	Addressed by Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches), Attachment 21 – Assessment of Scleractinian Cup Coral Effects (NIWA), Attachment 30 – Cup Coral Management Plan, and the Environmental Monitoring Management Plan (Attachment 29).	Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches) Attachment 21 – Assessment of Scleractinian Cup Corals Effects (NIWA) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026) Attachment 30 – Cup Coral Management Plan (CCMP) Attachment 35 – Recommended Wildlife Approval Conditions	Simon West addresses habitat disturbance, ecological recovery and cumulative effects. Dr Beaumont addresses cup coral abundance, resilience, habitat suitability and monitoring. Both conclude effects are manageable with monitoring and adaptive management. The updated Environmental Monitoring Management Plan (Attachment 29). The EMMP includes baseline and ongoing monitoring of benthic communities, sediment texture, functional groups, bryozoans, tubeworm-associated taxa, shell-associated habitats, and other sensitive benthic communities. Areas containing sensitive benthic communities must be excluded from extraction, while monitoring results can trigger cell closure, recovery requirements, increased monitoring or operational changes if adverse effects are identified.
Patuharakeke Te Iwi Trust Board & Ngātiwai Trust Board	Marine mammal impacts	Addressed by Attachment 14 – Assessment of Marine Mammal Effects (SLR), Attachment 28 – Marine Mammal Management Plan, Attachment 11 – Assessment of Underwater Noise Effects (Styles Group) and the updated recommended consent conditions. The application includes marine mammal detection and shutdown procedures, monitoring and reporting requirements, underwater soundscape monitoring, adaptive management responses, and restrictions on operations where marine mammals are present.	Attachment 14 – Assessment of Marine Mammals Effects (SLR) Attachment 11 – Assessment of Underwater Noise Effects (Styles Group) Attachment 28 – Marine Mammal Management Plan (MMMP) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026) Attachment 35 – Recommended Wildlife Approval Conditions	Dr Pine responds to concerns regarding underwater noise, passive acoustic monitoring, baseline soundscape monitoring and marine mammal behaviour. Confirms monitoring and management framework remains appropriate.
Patuharakeke Te Iwi Trust Board & Ngātiwai Trust Board	Coastal process uncertainty	Addressed by Attachment 8 – Assessment of Coastal Process Effects (Tonkin + Taylor) and the Environmental Monitoring Management Plan (Attachment 29).	Attachment 8 – Assessment of Coastal Process Effects (Tonkin + Taylor) Attachment 17 – Assessment of Surf Breaks Effects (Metocean Solutions) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026) Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions)	Remains primarily addressed through Attachment 8 – Assessment of Coastal Process Effects (Tonkin + Taylor), updated conditions and the strengthened EMMP monitoring framework. The updated Environmental Monitoring Management Plan (Attachment 29). The EMMP requires ongoing bathymetric surveys within extraction areas, adjacent bathymetric and control areas and shore-connected transects to identify any unexpected seabed lowering or coastal process effects. Monitoring results will determine any lowering of the shoreface and are assessed against the bathymetric control area and survey error margins, with adaptive management responses ranging from cell closures through to suspension of extraction of certain areas if

				monitoring identifies significant adverse coastal process effects.
Patuharakeke Te Iwi Trust Board & Ngātiwai Trust Board	Cumulative effects over time	Addressed across Attachment 8 – Coastal Process Effects, Attachment 12 – Benthic Ecology Effects, Attachment 14 – Marine Mammal Effects, and the EMMP (Attachment 29). The monitoring framework is specifically designed to assess cumulative and long-term effects through repeated SEMRs, trend analysis, control-site comparisons and recovery assessments. The framework evaluates cumulative adverse trajectories and requires management intervention where monitoring identifies persistent divergence from baseline or control conditions. Importantly, extraction volumes cannot increase from 150,000 m³/year to 250,000 m³/year unless monitoring demonstrates that adverse ecological, bathymetric and coastal process effects are not occurring. Notwithstanding this, MBL have also considered the effects on the Bream Bay food-web in Appendix C, Attachment 12 – Benthic Ecology Effects. Further cumulative effects are addressed in Attachment 9 – Water Quality Report, Appendix G - Jacobs (2020) Pākiri Water Quality Technical Report, Attachment 9 – Water Quality Report, Appendix G - Jacobs (2020) Pākiri Water Quality Technical Report. Attachment 11 – Underwater Noise, Section 5.5. Appendix C Cumulative ship noise modelling (AIS traffic), Figures 41-49. As well as Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions) and Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026), Sections 2.5, 3.1, 6.10 and 6.11.	Attachment 8 – Coastal Process Effects, Sections 5.11 & 6.1. Attachment 9 – Water Quality Report, Appendix G - Jacobs (2020) Pākiri Water Quality Technical Report. Attachment 11 – Underwater Noise, Section 5.5. Appendix C Cumulative ship noise modelling (AIS traffic), Figures 41-49 Attachment 12 – Benthic Ecology Effects, Section 6.4.1.7 Cumulative effects. Attachment 14 – Marine Mammal Effects, Section 4.9 – Cumulative Impacts. Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026), Sections 2.5, 3.1, 6.10 and 6.11 Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions)	Multiple experts directly address cumulative effects concerns. West in particular explains how the EMMP has been designed to identify cumulative adverse trajectories, recovery trends and trigger management responses if cumulative effects emerge. The updated EMMP (Attachment 29).
Patuharakeke Te Iwi Trust Board & Ngātiwai Trust Board	Consultation and engagement concerns	Addressed through the extensive engagement programme outlined in my evidence above, Attachment 5 – Consultation Summary. In respect to MBL’s ongoing consultation since lodging the substantive application, I refer to Mr Davis’s evidence in response to Minute 4 (RFI 1) dated 14 May 2026. Attachment 26 – Recommended Resource Consent Conditions and the updated EMMP (Attachment 29) also provides for ongoing participation through review and comment opportunities on monitoring reports, inclusion of hapū-led monitoring information, cultural review of management plan updates and consideration of mātauranga Māori indicators within the adaptive management framework.	Attachment 5 – Consultation Report L.Davis evidence in response to Minute 4 (RFI 1) dated 14 May 2026. Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust) Attachment 22 (Appendix A) – Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum Attachment 26 – Recommended Resource Consent Conditions Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	Primarily addressed through consultation history, CIAs, Joint Memorandum, updated consent conditions and tangata whenua (through Te Parawhau ki Tai at this stage) participation provisions within the EMMP. MBL remains open to this being extended to other key iwi/hapu representatives

Patuharakeke Te Iwi Trust Board & Ngātiwai Trust Board	Economic benefit claims overstated	Addressed by Attachment 18 – Assessment of Economic Effects (M.E Consulting) and Attachment 20 – Concrete Suitability Statement (Paul Donoghue). These assessments evaluate the role of the Project in supplying construction-grade sand, supporting regional infrastructure, housing and economic activity, while also considering environmental constraints and mitigation measures.	Attachment 18 – Assessment of Economic Effects (M.E Consulting) Attachment 20 – Concrete Suitability Statement (Paul Donoghue) Main Application / Assessment of Effects on the Environment	Lawrence McIlrath responds directly to criticisms of the economic case, alternative supply sources, manufactured sand and future supply constraints, concluding there remains a strong need for the Project.
Te Ohu Kaimoana (Māori Fisheries Trust)	Effects on customary fisheries	Addressed through Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd), which specifically assesses potential effects on customary/ recreational and commercial fisheries and concludes that the proposed extraction area represents a small proportion of available habitat and is unlikely to result in population-level effects on fisheries productivity. These conclusions are supported by Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches) and Attachment 9 – Assessment of Water Quality Effects (SLR). The updated Environmental Monitoring Management Plan (Attachment 29) requires ongoing monitoring of benthic habitats, scallops, benthic prey resources, sediment characteristics and ecological recovery, with adaptive management responses available if monitoring identifies adverse trends affecting fisheries values.	Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd) Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026) Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions)	Rick Boyd directly responds to concerns regarding fisheries productivity, fish abundance, habitat utilisation and fishing values. He concludes the extraction area is not an area of unusually high fisheries productivity and that population-level effects on customary fisheries are unlikely. Simon West confirms the updated EMMP includes monitoring of benthic prey resources, shell-associated habitats, functional groups and ecological indicators relevant to fisheries productivity, with adaptive management responses if adverse trends emerge.
Te Ohu Kaimoana (Māori Fisheries Trust)	Effects on Māori commercial fishing interests	Addressed through Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd), which assesses fishing effort, habitat utilisation, fish assemblages and potential interactions with commercial fishing activity. The report concludes that effects on commercial fishing interests are expected to be low due to the relatively small extraction footprint and progressive extraction methodology. Attachment 19 – Assessment of Navigational Safety Effects (B. Goodchild) also assesses vessel interactions and access issues. The updated EMMP (Attachment 29) provides ongoing monitoring of ecological conditions and fisheries-related indicators, with the ability to modify extraction practices if monitoring identifies unanticipated adverse effects.	Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd) Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026) Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions)	Boyd specifically addresses criticisms regarding commercial fishing activity, fish abundance and habitat utilisation. He concludes the extraction footprint is small relative to the wider fishery and is unlikely to result in significant adverse effects on commercial fishing productivity. He also responds to concerns regarding snapper abundance and the significance of Bream Bay to commercial fisheries.
Te Ohu Kaimoana (Māori Fisheries Trust)	Effects on taonga species	Addressed through a suite of specialist assessments including Attachment 13 – Assessment of Seabirds and Shorebirds Effects (NIWA), Attachment 14 – Assessment of Marine Mammal Effects (SLR), Attachment 21 – Assessment of Scleractinian Cup Coral Effects (NIWA) and Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches). Management measures are implemented through Attachment 28 – Marine Mammal Management Plan (MMMP), Attachment 30 – Cup Coral Management Plan (CCMP), Attachment 35 – Recommended Wildlife Approval Conditions, and the updated EMMP (Attachment 29). Monitoring includes seabirds, marine mammals, cup corals and benthic habitats, with trigger-based adaptive management responses where adverse effects are identified.	Attachment 13 – Assessment of Seabirds and Shorebirds Effects (NIWA) Attachment 14 – Assessment of Marine Mammals Effects (SLR) Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026) Attachment 35 – Recommended Wildlife Approval Conditions	Dr Beaumont provides updated evidence on cup coral abundance, habitat suitability, resilience and population-level effects. Dr Pine and Helen McConnell address concerns regarding marine mammals, underwater noise and monitoring methodologies. Simon West addresses ecological effects on benthic communities and associated species. Together, the updated evidence concludes effects on taonga species can be managed through monitoring, species-specific management plans and adaptive management.

Te Ohu Kaimoana (Māori Fisheries Trust)	Effects on wāhi tapu and rohe moana values	Addressed through Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust), Attachment 23 – Draft CIA (Patuharakeke Te Iwi Trust Board) and Attachment 24 – CIA (Ngātiwai Trust Board), which identify cultural values associated with Te Ākau / Bream Bay and the wider rohe moana. The applicant's position is that extraction occurs within a defined offshore area and does not directly disturb known wāhi tapu sites. The updated EMMP (Attachment 29) provides for tangata whenua participation in monitoring, review of monitoring reports and incorporation of mātauranga Māori indicators, helping ensure cultural values remain part of the ongoing management framework.	Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust) Attachment 23 – Draft CIA (Patuharakeke Te Iwi Trust Board) Attachment 24 – CIA (Ngātiwai Trust Board) Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	The matter remains primarily addressed through the CIAs, Joint Memorandum, Mahere Tikanga Plan, consent conditions and monitoring requirements in the EMMP. The updated application material supports protection of rohe moana values by strengthening monitoring and adaptive management provisions.
Te Ohu Kaimoana (Māori Fisheries Trust)	Inconsistency with Māori Fisheries Settlement / section 7 FTAA concerns	The applicant has sought to address fisheries and cultural concerns through comprehensive technical and cultural assessments. Fisheries interests are assessed in Attachment 16 – Assessment of Fish and Fisheries Effects, while cultural values are assessed through Attachments 22–24 CIAs. Proposed management measures are implemented through Attachment 26 – Recommended Resource Consent Conditions, Attachment 29 – Environmental Monitoring Management Plan, and associated management plans. The applicant acknowledges that concerns relating to the Māori Fisheries Settlement and interpretation of section 7 of the Fast-track Approvals Act are primarily legal and policy matters rather than environmental effects capable of being fully addressed through consent conditions, but considers that fisheries interests have been appropriately assessed and managed within.	Main Application / Assessment of Effects on the Environment Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd) Attachment 5 – Consultation Report Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions)	This is a legal interpretation of the Māori Fisheries Settlement or section 7 of the Fast-track Approvals Act 2024. Boyd's updated evidence addresses fisheries effects, and fisheries interests have been appropriately assessed and managed within. The settlement and statutory interpretation issues remain legal and policy matters rather than technical environmental matters.
Te Rerenga Parāoa Rohe Moana Kaitiaki	Effects on tikanga and mana moana	Addressed through Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust), Attachment 23 – Draft CIA (Patuharakeke Te Iwi Trust Board) and Attachment 24 – CIA (Ngātiwai Trust Board), which identify tikanga, mana moana, kaitiakitanga responsibilities and cultural values associated with Te Ākau. The applicant has also entered into the Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A), which records agreed cultural outcomes and ongoing engagement commitments. The Environmental Monitoring Management Plan (Attachment 29) strengthens this response by requiring Te Parawhau ki Tai review of PSEARs, SEMRs and EMMP amendments, incorporation of hapū-led monitoring information, consideration of mātauranga Māori indicators of mauri, and opportunities for cultural input into adaptive management decisions throughout the life of the consent. MBL notes the position of Te Pouwhenua o Tiakiriri Kūkupa Trust that participation in the application was intended to secure enforceable cultural protections, tikanga requirements, cultural monitoring, adaptive management controls and restoration initiatives that would not otherwise be available under the FTAA process. These commitments are reflected in the Joint Memorandum, proposed conditions and EMMP.	Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust) Attachment 23 – Draft CIA (Patuharakeke Te Iwi Trust Board) Attachment 24 – CIA (Ngātiwai Trust Board) Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	The EMMP (in Sections 2.2 (EMMP Review Methodology), 5.8 (Written Deliverables (for the PSEAR)) and 6.13 (Written Deliverables) (for the SEMR))) and recommended Conditions 22 and 37 provides a pathway for Te Parawhau ki Tai participation through reviews of the draft PSEAR's and SEMR's. MBL remains open to this being extended to other key iwi/hapu representatives

Te Rerenga Parāoa Rohe Moana Kaitiaki	Effects on mauri of Te Ākau	MBL acknowledges that mauri is a cultural concept that cannot be fully assessed through science alone. The application responds through a combination of environmental protection measures and cultural monitoring. Environmental effects are assessed in Attachments 8, 9, 12, 13, 14, 16 and 21, while the updated EMMP (Attachment 29) specifically allows mātauranga Māori assessments of mauri to be incorporated into monitoring reports and adaptive management decisions. The CIA process, Joint Memorandum and Mahere Tikanga Plan also provide mechanisms for cultural values to be considered alongside scientific monitoring results when assessing environmental performance.	Attachment 29 – EMMP Sections 5.8 and 6.13 Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust) Attachment 22 (Appendix A) – Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	The EMMP provides for mātauranga Maori input in Sections 2.2 (EMMP Review Methodology), 5.8 (Written Deliverables (for the PSEAR)) and 6.13 (Written Deliverables) (for the SEMR)) and supported by recommended Conditions 10, 22, 37, 44, 47. The technical experts support the conclusion that environmental effects can be managed through monitoring and adaptive management.
Te Rerenga Parāoa Rohe Moana Kaitiaki	Effects on taonga species	Addressed through Attachment 13 – Assessment of Seabirds and Shorebirds Effects (NIWA), Attachment 14 – Assessment of Marine Mammal Effects (SLR), Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd), Attachment 21 – Assessment of Scleractinian Cup Coral Effects (NIWA) and Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches). These assessments evaluate potential effects on seabirds, marine mammals, pelagic and benthic fish, benthic ecology, cup corals and other ecologically significant species such as sharks, stingrays, and marine reptiles. Management measures are implemented through Attachment 28 – Marine Mammal Management Plan (MMMP), Attachment 30 – Cup Coral Management Plan (CCMP), Attachment 35 – Recommended Wildlife Approval Conditions, and the updated EMMP (Attachment 29). Monitoring includes species-specific reporting and adaptive management responses where monitoring identifies unexpected adverse effects.	Attachment 13 – Assessment of Seabirds and Shorebirds Effects (NIWA) Attachment 14 – Assessment of Marine Mammals Effects (SLR) Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd) Attachment 29 – EMMP, Section 9 Logs Attachment 35 – Recommended Wildlife Approval Conditions	Updated evidence strengthens the original assessment through additional responses on cup corals (Dr Beaumont), marine mammals and underwater noise (Dr Pine), and benthic ecological values (West). The experts conclude effects can be appropriately managed through monitoring, species-specific management plans and adaptive management triggers.
Te Rerenga Parāoa Rohe Moana Kaitiaki	Scallop recovery concerns	Addressed through Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches) and Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd). The updated EMMP (Attachment 29) now requires monitoring of scallop abundance, size distribution, habitat condition and recovery trajectories within extraction and control areas. Recovery performance is assessed through repeated monitoring and comparison with reference sites. If recovery is slower than predicted or adverse trends emerge, adaptive management responses include increased monitoring, delayed extraction, extended recovery periods, closure of extraction cells or changes to extraction methodology.	Attachment 29 – EMMP Sections 6.10 and Appendix F Attachment 12 – Assessment of Benthic Ecology Effects Attachment 16 – Assessment of Fish and Fisheries Effects	Simon West directly responds to concerns regarding scallop recovery, ecological recovery trajectories and monitoring design. The updated EMMP now includes scallop density monitoring, size-class monitoring, control-site comparisons, recovery trajectory assessments and adaptive management triggers. Boyd supports the conclusion that adverse population-level effects on scallops are unlikely.

Te Rerenga Parāoa Rohe Moana Kaitiaki	Sand viewed as a living, non-renewable resource / fundamental cultural concern	MBL acknowledges that this concern reflects a cultural worldview that may not be fully mitigated through technical western scientific measures. The application responds through the preparation of multiple CIAs (Attachments 22–24), ongoing engagement with tangata whenua, implementation of the Te Parawhau Joint Memorandum, and incorporation of cultural participation within the updated EMMP (Attachment 29). Technical assessments including Attachment 8 – Assessment of Coastal Process Effects, Attachment 12 – Assessment of Benthic Ecology Effects and associated monitoring programmes conclude that environmental effects can be appropriately managed and are within a low-negligible level of effect. However, MBL recognises that some opposition may remain based on cultural principles relating to the removal of seabed material rather than environmental effects alone.	Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust) Attachment 23 – Draft CIA (Patuharakeke Te Iwi Trust Board) Attachment 24 – CIA (Ngātiwai Trust Board) Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	The concern remains primarily addressed through the CIAs, Joint Memorandum, proposed Mahere Tikanga Plan, ongoing engagement and specific inputs into the EMMP review, PSEAR and SEMR processes in the EMMP. The technical experts instead address the environmental effects associated with extraction and conclude those effects can be appropriately managed.
Te Iwitahi Manihera Whānau (24b – Statement of Evidence / BoE)	Whakapapa and customary connection to the area	The application recognises that Te Ākau / Bream Bay has deep ancestral, customary and whakapapa significance for multiple tangata whenua groups. Cultural relationships with the area are acknowledged through Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust), Attachment 23 – Draft CIA (Patuharakeke Te Iwi Trust Board) and Attachment 24 – CIA (Ngātiwai Trust Board). The applicant does not dispute the existence of whakapapa connections and has sought to recognise cultural relationships through engagement (Attachment 5 – Consultation Summary), cultural assessments, the Joint Memorandum, proposed cultural monitoring provisions and ongoing participation opportunities under the EMMP (Attachment 29).	Attachment 5 – Consultation Summary Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust) Attachment 23 – Draft CIA (Patuharakeke Te Iwi Trust Board) Attachment 24 – CIA (Ngātiwai Trust Board)	This remains primarily addressed through the CIAs, Joint Memorandum, consultation record and cultural engagement process. The application acknowledges these connections rather than disputing them.
Te Iwitahi Manihera Whānau (24b – Statement of Evidence / BoE)	Consultation deficiencies	MBL’s position is that engagement has been undertaken over several years with a broad range of tangata whenua groups (refer to Attachment 5 – Consultation Summary), including direct meetings, cultural assessments and ongoing discussions throughout the development of the proposal. While acknowledging that some parties remain dissatisfied with aspects of the consultation process, the application provides opportunities for tangata whenua participation (namely Te Parawhau ki Tai) through the EMMP (Attachment 29), including review of monitoring reports, opportunities to provide comments on environmental performance, inclusion of hapū-led monitoring information and participation in future management plan reviews.	Attachment 5 – Consultation Report Attachment 22 – CIA Attachment 22 (Appendix A) – Joint Memorandum Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026) Sections 2.3, 5.8 and 6.12	This is a consultation and process issue addressed through the engagement history, CIAs, Joint Memorandum, ongoing participation provisions in the EMMP and proposed consent conditions.
Te Iwitahi Manihera Whānau (24b – Statement of Evidence / BoE)	MACA interests not adequately recognised	The applicant acknowledges the existence of MACA interests within the project area. In addition to the CIA process and ongoing engagement, the applicant notes that Te Pouwhenua’s evidence records that explicit protection of active MACA claims was negotiated as part of its engagement with the proposal and incorporated into the cultural and relationship framework supporting the application. The updated Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026) and proposed consent framework also provide for ongoing tangata whenua participation in environmental management and adaptive management processes.	Attachment 5 – Consultation Report Attachment 22 – CIA Attachment 23 – Draft CIA Attachment 24 – CIA Main Application / Assessment of Effects on the Environment	This remains addressed through the CIAs, consultation process, Joint Memorandum, Mahere Tikanga Plan, and participation provisions within the EMMP. The issue is primarily cultural, legal and governance-related rather than technical.

Te Iwitahi Manihera Whānau (24b – Statement of Evidence / BoE)	Concerns regarding authority over the rohe moana / whānau interests	MBL acknowledges that differing views exist regarding customary authority, representation and interests within the project area. The application does not attempt to resolve competing claims between iwi, hapū or whānau groups. Rather, it seeks to ensure that cultural values are recognised through multiple CIAs, broad engagement, the Joint Memorandum, proposed cultural monitoring provisions and ongoing participation opportunities within the EMMP (Attachment 29) and Updated Draft Conditions (Attachment 26). MBL's position is that these arrangements allow ongoing recognition of cultural interests while avoiding taking a position on questions of mandate or representation.	Attachment 5 – Consultation Report Attachment 22 – CIA Attachment 22 (Appendix A) – Joint Memorandum Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions)	The application deliberately avoids taking a position on mandate disputes and instead relies on multiple CIAs, consultation records and ongoing participation opportunities.
Te Parawhau ki Tai (MAC-01-01-137) / Marina Fletcher	Kaitiakitanga responsibilities	This concern is addressed most directly through Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust) and the Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A). The updated Environmental Monitoring Management Plan (Attachment 29) significantly strengthens this response by requiring Te Parawhau ki Tai to receive draft PSEARs, SEMRs and proposed EMMP amendments for review and comment. The EMMP also allows mātauranga Māori assessments, hapū-led monitoring information and cultural indicators of mauri to assess environmental health which will be incorporated into reporting and adaptive management decisions. These provisions enable ongoing exercise of kaitiakitanga throughout the life of the Project rather than limiting involvement to the consenting phase.	Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust) Attachment 22 (Appendix A) – Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	The updated EMMP provides for tangata whenua participation, adaptive management, cultural monitoring and review processes and supports the environmental monitoring framework within which kaitiakitanga can continue to be exercised.
Te Parawhau ki Tai (MAC-01-01-137) / Marina Fletcher	Cultural authority and whakapapa connections	MBL recognises Te Parawhau's mana whenua and mana moana relationship with Te Ākau through Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust) and the Joint Memorandum (Attachment 22 Appendix A). The CIA records Te Parawhau values, concerns and recommendations, while the Joint Memorandum demonstrates a collaborative approach to addressing cultural issues. Ongoing participation provisions within the updated EMMP (Attachment 29), proposed consent conditions and Mahere Tikanga Plan which further recognises that Te Parawhau's relationship with the area extends beyond environmental effects and includes cultural authority, whakapapa and ongoing stewardship responsibilities. MBL also relies on the position expressed by Te Pouwhenua o Tiakiriri Kūkupa Trust that engagement was pursued to protect Te Parawhau interests within a Fast-track process that provides limited opportunities for tangata whenua to influence outcomes. The Trust's evidence records that cultural participation, MACA protections, monitoring roles, tikanga requirements and relationship agreements were secured through engagement and negotiation.	Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust) Attachment 22 (Appendix A) – Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	Cultural authority or whakapapa relationships remain addressed through Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust), the Joint Memorandum and associated cultural arrangements, such as the Substantive Agreement relating to the Bream Bay Sand Extraction Project (dated 26 May 2026).

Te Parawhau ki Tai (MAC-01-01-137) / Marina Fletcher	Effects on whales and marine mammals	Addressed through Attachment 14 – Assessment of Marine Mammal Effects (SLR) and Attachment 11 – Assessment of Underwater Noise Effects (Styles Group), which assess habitat use, underwater noise, vessel strike risk, behavioural disturbance, entanglement and cumulative effects. Mitigation measures are implemented through Attachment 28 – Marine Mammal Management Plan (MMMP) and strengthened by Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026). The updated conditions and management plans include marine mammal observation requirements, operational controls, incident reporting, adaptive management responses and ongoing monitoring throughout Project operations.	Attachment 14 – Assessment of Marine Mammals Effects (SLR) Attachment 11 – Assessment of Underwater Noise Effects (Styles Group) Attachment 28 – Marine Mammal Management Plan (MMMP) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026) Attachment 35 – Recommended Wildlife Approval Conditions	Dr Pine directly responds to concerns regarding underwater noise, passive acoustic monitoring, marine mammal detections, baseline soundscape monitoring and behavioural effects. He concludes that the monitoring and management framework remains appropriate and that marine mammal effects can be appropriately managed through the MMMP, Wildlife Conditions and EMMP.
Te Parawhau ki Tai (MAC-01-01-137) / Marina Fletcher	Effects on seabirds and taonga species	Addressed through Attachment 13 – Assessment of Seabirds and Shorebirds Effects (NIWA), Attachment 14 – Assessment of Marine Mammal Effects (SLR), Attachment 21 – Assessment of Scleractinian Cup Coral Effects (NIWA) and Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches). These assessments are supported by the MMMP (Attachment 28), CCMP (Attachment 30), Recommended Wildlife Approval Conditions (Attachment 35) and the updated EMMP (Attachment 29). Monitoring programmes include ecological indicators, protected species observations and adaptive management responses where monitoring identifies unexpected effects on taonga species.	Attachment 13 – Assessment of Seabirds and Shorebirds Effects (NIWA) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026) Section 9 and Appendix G Attachment 35 – Recommended Wildlife Approval Conditions	Dr Beaumont addresses cup coral abundance, resilience and population-level effects. Dr Pine and Helen McConnell respond to marine mammal concerns. Simon West addresses benthic ecological values and ecosystem functioning. Together the updated evidence strengthens the original conclusion that effects on taonga species can be appropriately managed through monitoring and adaptive management.
Te Parawhau ki Tai (MAC-01-01-137) / Marina Fletcher	Effects on fisheries resources	Addressed through Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd), which concludes that extraction is unlikely to result in population-level effects on commercial or customary/recreational fisheries. These conclusions are supported by Attachment 12 – Assessment of Benthic Ecology Effects and ongoing monitoring requirements within the updated EMMP (Attachment 29). The EMMP requires monitoring of benthic habitats, prey resources, scallops, sediment condition and ecological recovery, with adaptive management responses available if monitoring identifies adverse related trends.	Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd) Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026) Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions)	Rick Boyd directly responds to concerns regarding fisheries productivity, fish abundance, habitat utilisation and commercial/recreational fishing values. Simon West addresses ecological recovery, benthic prey resources and food-web considerations. Both conclude population-level effects on fisheries resources are unlikely.
Te Parawhau ki Tai (MAC-01-01-137) / Marina Fletcher	Disturbance of ancient seabed / MACA interests / ongoing cultural use of Bream Bay	MBL acknowledges that concerns regarding disturbance of the seabed, customary interests and cultural use of Te Ākau extend beyond ecological effects alone. The proposal responds through the CIA process, the Te Parawhau Joint Memorandum, the Mahere Tikanga Plan, ongoing engagement commitments and a comprehensive environmental monitoring framework. Technical assessments including Attachment 8 – Assessment of Coastal Process Effects, Attachment 12 – Assessment of Benthic Ecology Effects, Attachment 16 – Assessment of Fish and Fisheries Effects and associated management plans conclude that environmental effects are within a low-negligible magnitude and can be monitored and managed effectively. MBL has also updated Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions) which now includes a maritime archaeological and heritage assessment (Condition 20B) to be undertaken prior to	Attachment 5 – Consultation Report Attachment 22 – CIA Attachment 22 (Appendix A) – Joint Memorandum Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	The seabed disturbance component is addressed by Simon West, Dr Beaumont and Richard Boyd through updated ecological, fisheries and benthic evidence. However, MACA interests and cultural use concerns remain primarily cultural and legal matters addressed through the CIAs, Joint Memorandum, proposed Mahere Tikanga Plan and participation provisions in the EMMP.

		commencing sand extraction. The existing accidental discovery protocol (Condition 46) provides for adaptive monitoring and management if koiwi (human bones) or archaeological artefacts are discovered at any time during sand extraction or monitoring.		
Kōwhai Te Awhina Hapū o Te Parawhau Hapū Incorporation	Ecological uncertainty	The applicant has addressed ecological uncertainty through a comprehensive assessment and adaptive management framework. Ecological effects are assessed in Attachment 12 – Assessment of Benthic Ecology Effects (Bioreserches), Attachment 13 – Assessment of Seabirds and Shorebirds Effects (NIWA), Attachment 14 – Assessment of Marine Mammal Effects (SLR), Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd) and Attachment 21 – Assessment of Scleractinian Cup Coral Effects (NIWA). The updated Environmental Monitoring Management Plan (Attachment 29) provides ongoing verification through PSEARs, SEMRs, control-site comparisons, recovery trajectory assessments and adaptive management triggers. If monitoring identifies effects that differ from the control areas, responses include increased monitoring, extraction redistribution, cell closure, operational changes or reduced extraction volumes.	Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026) Sections 3.1, 6.10 and 6.11 Attachment 12 – Assessment of Benthic Ecology Effects Attachment 26 – Recommended Conditions	Multiple experts respond directly to uncertainty concerns and support the updated EMMP framework, including recovery monitoring, adaptive management triggers, control-site comparisons, SEMRs and long-term trend analysis.
Kōwhai Te Awhina Hapū o Te Parawhau Hapū Incorporation	Cumulative effects	As mentioned in my above response, cumulative effects are assessed within Attachment 8 – Assessment of Coastal Process Effects (Tonkin + Taylor), Attachment 12 – Assessment of Benthic Ecology Effects, Attachment 14 – Assessment of Marine Mammal Effects and Attachment 16 – Assessment of Fish and Fisheries Effects. The updated EMMP (Attachment 29) requires cumulative trend analysis through successive SEMRs, comparison against baseline and control sites, and assessment of ecological recovery trajectories. The framework includes Watch, Trigger and Action thresholds that require investigation and management intervention where cumulative adverse trends emerge. Importantly, extraction volumes cannot increase unless monitoring demonstrates that cumulative ecological, bathymetric and coastal process effects remain within predicted limits. Further cumulative effects are addressed in Attachment 9 – Water Quality Report, Appendix G - Jacobs (2020) Pākiri Water Quality Technical Report, Attachment 9 – Water Quality Report, Appendix G - Jacobs (2020) Pākiri Water Quality Technical Report. Attachment 11 – Underwater Noise, Section 5.5. Appendix C Cumulative ship noise modelling (AIS traffic), Figures 41-49. As well as Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions).	Attachment 8 – Coastal Process Effects, Sections 5.11 & 6.1. Attachment 9 – Water Quality Report, Appendix G - Jacobs (2020) Pākiri Water Quality Technical Report. Attachment 11 – Underwater Noise, Section 5.5. Appendix C Cumulative ship noise modelling (AIS traffic), Figures 41-49 Attachment 12 – Benthic Ecology Effects, Section 6.4.1.7 Cumulative effects. Attachment 14 – Marine Mammal Effects, Section 4.9 – Cumulative Impacts. Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026), Sections 2.5, 3.1, 6.10 and 6.11 Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions)	Simon West specifically addresses cumulative ecological effects and recovery trajectories. Dr Beaumont, Boyd and Dr Pine also address cumulative considerations within their respective disciplines. The EMMP has been updated to assess cumulative adverse trajectories through repeated monitoring and adaptive management.

Kōwhai Te Awhina Hapū o Te Parawhau Hapū Incorporation	Intergenerational impacts	Intergenerational concerns are addressed through long-term environmental monitoring, staged extraction and adaptive management. The proposal includes strict extraction limits, recovery monitoring and progressive assessment of environmental performance before any future increase in extraction volume can occur. The updated EMMP (Attachment 29) requires assessment of long-term ecological trajectories, recovery performance and cumulative effects. Cultural and intergenerational values are also recognised through Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust) and the commitments contained in the Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A).	Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust) Attachment 22 (Appendix A) – Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	The application supports long-term monitoring, staged extraction, recovery assessment and adaptive management, which are intended to protect environmental values over the long term.
Kōwhai Te Awhina Hapū o Te Parawhau Hapū Incorporation	Kaitiakitanga obligations	Addressed through Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust), the Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A), Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions) and the updated Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026). Te Parawhau's position is that engagement with the application was undertaken specifically to secure environmental and cultural protections that would not otherwise exist under the FTAA, including cultural monitoring, tikanga-based management measures, adaptive management triggers, environmental restoration initiatives and ongoing participation in environmental management. The updated EMMP requires Te Parawhau review of PSEARs, SEMRs and management plan amendments and allows mātauranga Māori assessments and hapū-led monitoring to directly inform adaptive management decisions.	Attachment 22 – CIA Attachment 22 (Appendix A) – Joint Memorandum Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026) Sections 2.3, 5.8 and 6.12	The EMMP framework, PSEAR/SEMR review process and adaptive management mechanisms provide ongoing opportunities for exercise of kaitiakitanga.
Kōwhai Te Awhina Hapū o Te Parawhau Hapū Incorporation	Ecological recovery trajectories unresolved	The updated EMMP (Attachment 29) directly addresses uncertainty regarding recovery trajectories. Monitoring programmes assess recovery of benthic communities, sediment characteristics, scallops and ecological indicators over time and compare results with control sites. Recovery performance is assessed against predefined criteria and recovery envelopes. If recovery is slower than predicted or ecological conditions diverge from expected trajectories, adaptive management responses include increased monitoring, delayed extraction, reduced extraction intensity, extended recovery periods and closure of extraction cells until recovery is demonstrated.	Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026) Glossary; Sections 3.1, 6.10 and 6.11	Simon West directly responds to concerns regarding ecological recovery trajectories. The updated EMMP now includes recovery monitoring, recovery envelopes, control-site comparisons and adaptive management triggers if recovery is slower than predicted.
Kōwhai Te Awhina Hapū o Te Parawhau Hapū Incorporation	Economic benefits do not outweigh local burdens	Economic benefits are assessed in Attachment 18 – Assessment of Economic Effects (M.E Consulting) and Attachment 20 – Concrete Suitability Statement (Paul Donoghue), which evaluate the importance of the resource for infrastructure, housing and economic development. However, the application does not rely solely on economic benefits. Cultural values are assessed through Attachments 22–24 CIAs, while environmental effects are addressed through specialist technical reports, proposed consent conditions and the updated EMMP (Attachment 29).	Attachment 18 – Assessment of Economic Effects Attachment 20 – Concrete Suitability Statement Attachment 26 – Recommended Conditions Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	Lawrence McIlrath directly responds to criticisms of the economic case, including alternative sand supplies, transport costs, market demand and future supply constraints. He concludes there remains a strong need for the Project and challenges assumptions made by opposing economic experts. The Second Statement of Evidence of Pari Walker on behalf of Te Pouwhenua O Tiakiriri Kūkupa Trust (Te Parawhau Ki Tai), specifically Paragraphs 6-10 under the subheading 'Mahi Whakaora – and the benefits of this proposal' considers the benefits to be genuine and capable of enhancing its ability to

				protect and restore the mauri of Paepae Atua over the life of the consent.
Hapū o Te Waiariki, Ngāti Korora, Ngāti Takapari	Mana moana and tikanga concerns	Addressed through Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust), Attachment 23 – Draft CIA (Patuharakeke Te Iwi Trust Board) and Attachment 24 – CIA (Ngātiwai Trust Board). These assessments identify tikanga, mana moana and cultural values associated with Te Ākau. MBL has committed to ongoing tangata whenua participation through the Te Parawhau Joint Memorandum (Attachment 22 Appendix A) and the EMMP (Attachment 29), which provides for cultural monitoring, review of environmental reports and incorporation of mātauranga Māori indicators into adaptive management processes. Ongoing participation provisions within the EMMP (Attachment 29), proposed consent conditions and the proposed Mahere Tikanga Plan which further recognises that Te Parawhau's relationship with the area extends beyond environmental effects and includes cultural authority, whakapapa and ongoing stewardship responsibilities.	Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust) Attachment 23 – Draft CIA (Patuharakeke Te Iwi Trust Board) Attachment 24 – CIA (Ngātiwai Trust Board) Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	The issue remains primarily addressed through the CIAs, Joint Memorandum, cultural monitoring provisions and tangata whenua participation (Currently Te Parawhau ki Tai but MBL is open to wider iwi and hapu involvement) within the EMMP.
Hapū o Te Waiariki, Ngāti Korora, Ngāti Takapari	Effects on kaimoana	Addressed through Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd), Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches) and Attachment 9 – Assessment of Water Quality Effects (SLR). These reports assess habitat effects, fisheries productivity, benthic communities and sediment plume behaviour. The updated EMMP (Attachment 29) requires monitoring of the sediment plume, scallops, benthic prey resources, sediment composition and ecological recovery, with management responses available if monitoring identifies adverse effects on fisheries resources or kaimoana values.	Attachment 9 – Assessment of Water Quality Effects (SLR) Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches) Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026) Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions)	Boyd addresses fisheries productivity and habitat utilisation, while West addresses benthic prey resources, ecological recovery and habitat condition. The updated EMMP includes scallop monitoring, habitat monitoring and adaptive management provisions relevant to kaimoana values.
Hapū o Te Waiariki, Ngāti Korora, Ngāti Takapari	Effects on seabed ecology	Addressed through Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches) and supported by the updated EMMP (Attachment 29). Monitoring includes sediment sampling, benthic fauna assessments, habitat mapping, drop-camera surveys and control-site comparisons. Sensitive benthic communities identified during monitoring must be avoided, and adaptive management responses include exclusion of extraction cells, increased monitoring, recovery requirements and operational modifications where ecological thresholds are exceeded.	Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches) Attachment 21 – Assessment of Scleractinian Cup Corals Effects (NIWA) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026) Attachment 30 – Cup Coral Management Plan (CCMP) Attachment 35 – Recommended Wildlife Approval Conditions	Simon West directly responds to concerns regarding habitat disturbance, ecological recovery, benthic communities and monitoring design. Dr Beaumont addresses cup coral habitats and ecological resilience. Both support the adaptive management framework.
Hapū o Te Waiariki, Ngāti Korora, Ngāti Takapari	Effects on cup corals	Addressed through Attachment 21 – Assessment of Scleractinian Cup Coral Effects (NIWA), Attachment 30 – Cup Coral Management Plan (CCMP) and Attachment 35 – Recommended Wildlife Approval Conditions. The CCMP establishes procedures for identifying, avoiding and managing cup coral habitats. The updated EMMP (Attachment 29) incorporates monitoring of cup coral observations and ecological indicators, with adaptive management measures	Attachment 21 – Assessment of Scleractinian Cup Corals Effects (NIWA) Attachment 30 – Cup Coral Management Plan (CCMP) Attachment 35 – Recommended Wildlife Approval Conditions Attachment 29 – Environmental Monitoring Management Plan	Dr Beaumont directly responds to concerns regarding coral abundance, distribution, habitat suitability, resilience, monitoring and population-level effects. This concern is now substantially addressed by the June 2026 evidence.

		available if monitoring identifies adverse effects on cup coral populations or habitats.	(EMMP) (Updated May 2026) Sections 6.4, 6.10 and Appendix F	
Hapū o Te Waiariki, Ngāti Korora, Ngāti Takapari	Environmental degradation and intergenerational impacts	MBL addresses these concerns through the Project's design, extraction limits, specialist assessments and a robust adaptive management framework. Long-term monitoring under the updated EMMP (Attachment 29) assesses ecological recovery, cumulative effects, bathymetric changes and environmental trajectories over time. Extraction volume increases are contingent upon monitoring demonstrating that significant adverse ecological, coastal process and bathymetric effects are not occurring. Cultural and intergenerational values are also recognised through the CIA process and ongoing tangata whenua participation provisions.	Attachment 29 – EMMP Sections 1, 2.5, 3.1, 3.2, 6.9, 6.10 and 6.11 Attachment 26 – Recommended Conditions	Multiple experts respond to concerns regarding long-term environmental effects and uncertainty. The updated EMMP now contains recovery trajectory monitoring, cumulative effects assessment and adaptive management provisions specifically designed to identify and respond to environmental degradation over time.
Hapū o Te Waiariki, Ngāti Korora, Ngāti Takapari	Consultation concerns / economic benefits do not outweigh cultural impacts	Consultation is documented in Attachment 5 – Consultation Summary, the preparation of Attachments 22–24 CIAs, and ongoing engagement commitments. Economic benefits are assessed in Attachment 18 – Assessment of Economic Effects (M.E Consulting), while cultural values are assessed separately through the CIA framework, the Te Parawhau Joint Memorandum, proposed consent conditions and the updated EMMP (Attachment 29). MBL acknowledges that some parties may continue to disagree with the balance struck between economic, cultural and environmental considerations despite the mitigation and monitoring measures proposed.	Attachment 5 – Consultation Summary Attachment 18 – Assessment of Economic Effects Attachment 22 – CIA Attachment 23 – Draft CIA Attachment 24 – CIA	McIlrath directly addresses the economic component of this concern. The consultation and cultural weighting aspects are not addressed by technical experts and remain matters for the CIAs, Joint Memorandum and decision-makers.
Te Kauika o Patuharakeke Waka Ama Incorporated	Marine safety hazards for waka users	Addressed through Attachment 19 – Assessment of Navigational Safety Effects (B. Goodchild), which specifically considers interactions between extraction vessels and recreational users, including waka ama. The assessment concludes that navigation risks can be managed through vessel operating procedures, communication requirements and maritime safety controls. Proposed consent conditions require vessel tracking, navigational compliance and reporting of incidents. The extraction area is located approximately 4.7 km offshore and occupies only a small portion of the wider marine environment available to waka users. Further I defer to R.Boyd's reply statement of evidence in his Appendix A – Bream Bay Marine Activity People Movement Data Technical Note where <i>the outputs are intended to support interpretation of broad activity patterns</i> which concluded <i>across all reporting categories, more than 99% of observed activity occurred outside the proposed sand extraction area. The data does not indicate that the extraction area is a major concentration point for observed activity within the wider Bream Bay study area.</i>	Attachment 19 – Assessment of Navigational Safety Effects (B. Goodchild) Attachment 27 – Sand Extraction Operation Plan (SEOP) R.Boyd's reply statement of evidence	Remains primarily addressed by Attachment 19 – Assessment of Navigational Safety Effects (B. Goodchild), the SEOP and proposed consent conditions.
Te Kauika o Patuharakeke Waka Ama Incorporated	Navigational exclusion and displacement from ancestral waters	MBL acknowledges concerns regarding use of customary and ancestral waters. However, the proposal does not create a permanent exclusion zone across Bream Bay.	Attachment 19 – Assessment of Navigational Safety Effects (B. Goodchild) Attachment 27 – Sand Extraction Operation Plan (SEOP) R.Boyd's reply statement of evidence	This remains primarily a cultural and navigation issue addressed through the Navigation Safety Assessment, SEOP, CIAs and consent conditions.

Te Kauika o Patuharakeke Waka Ama Incorporated	Loss of access to customary and recreational waka routes	Addressed through Attachment 19 – Assessment of Navigational Safety Effects (B. Goodchild) and the proposed consent conditions. The assessment concludes that the extraction area occupies only a small portion of the wider marine environment and does not create a permanent exclusion zone. Vessel movements, collision risk and user interactions were assessed, with navigational safety controls proposed to ensure continued access around the extraction area. The applicant's position is that customary and recreational waka routes remain available, with operational controls, vessel tracking and communication procedures reducing potential conflicts between extraction vessels and marine users. As above, I defer to R.Boyd's reply statement of evidence in his Appendix A – Bream Bay Marine Activity People Movement Data Technical Note which concluded <i>across all reporting categories, more than 99% of observed activity occurred outside the proposed sand extraction area. The data does not indicate that the extraction area is a major concentration point for observed activity within the wider Bream Bay study area.</i>	Attachment 19 – Assessment of Navigational Safety Effects (B. Goodchild) Attachment 27 – Sand Extraction Operation Plan (SEOP) R.Boyd's reply statement of evidence	The application continues to rely on the Navigational Safety Assessment, which concludes the extraction area occupies a small part of the wider bay and does not create permanent exclusion zones. R.Boyd's reply statement of evidence in Appendix 1 concludes more than 99% of observed activity occurred outside the proposed sand extraction area.
Te Kauika o Patuharakeke Waka Ama Incorporated	Cultural exclusion from Te Ākau / Bream Bay	MBL's position is that the proposal does not prevent ongoing cultural use of Bream Bay.	Attachment 19 – Assessment of Navigational Safety Effects (B. Goodchild) Attachment 27 – Sand Extraction Operation Plan (SEOP) R.Boyd's reply statement of evidence	Not addressed by technical experts. This remains primarily addressed through the CIAs, Joint Memorandum, cultural monitoring and the EMMP.
Te Kauika o Patuharakeke Waka Ama Incorporated	Effects on coastal processes, water quality and ecological values	Addressed through Attachment 8 – Assessment of Coastal Process Effects (Tonkin + Taylor), Attachment 9 – Assessment of Water Quality Effects (SLR), Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches) and Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd). These assessments conclude that effects are low-negligible. The updated EMMP (Attachment 29) strengthens this response through ongoing bathymetric surveys, sediment monitoring, plume monitoring, benthic ecology monitoring and recovery assessments. Trigger-based adaptive management responses include operational changes, increased monitoring, exclusion of extraction cells and suspension of extraction where monitoring identifies adverse environmental trends.	Attachment 8 – Coastal Process Effects Attachment 9 – Water Quality Effects Attachment 12 – Benthic Ecology Effects Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	Simon West responds to ecological uncertainty, habitat disturbance, cumulative effects and recovery monitoring. Rick Boyd addresses fisheries and ecological productivity concerns. The updated EMMP strengthens bathymetric, ecological and recovery monitoring and provides adaptive management triggers if adverse trends emerge.
Takahiwai Māori Committee	Removal of ancestral coastal sand	The applicant acknowledges the cultural significance of sand resources to tangata whenua. However, Attachment 8 – Assessment of Coastal Process Effects (Tonkin + Taylor) concludes that the extraction area is located approximately 4.7 km offshore, beyond the active coastal sediment transport zone, and does not involve removal of beach or dune sand. The proposal relates to offshore marine sand deposits. Environmental effects are assessed through the specialist reports and managed through proposed consent conditions, the updated Environmental Monitoring Management Plan (Attachment 29) and ongoing monitoring of bathymetry, sediment movement and ecological recovery.	Attachment 22 – CIA Attachment 23 – Draft CIA Attachment 24 – CIA Attachment 8 – Coastal Process Effects	The existing Coastal Process Assessment remains the primary response and confirms extraction is from offshore marine sand deposits rather than beach or dune systems.

		Notwithstanding this, MBL has also updated Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions) which now includes a maritime archaeological and heritage assessment (Condition 20B) to be undertaken prior to commencing sand extraction. The existing accidental discovery protocol (Condition 46) provides for adaptive monitoring and management if koiwi (human bones) or archaeological artefacts are discovered at any time during sand extraction or monitoring.		
Takahiwai Māori Committee	Effects on whakapapa relationships with the moana	MBL recognise the ancestral and cultural relationships that tangata whenua maintain with Te Ākau and the wider rohe moana. The updated EMMP (Attachment 29) provides ongoing opportunities for tangata whenua participation, including review of monitoring reports, cultural monitoring and incorporation of mātauranga Māori assessments into adaptive management processes.	Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions) Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	No technical expert addresses whakapapa relationships. This remains primarily addressed through the CIAs, Joint Memorandum, cultural monitoring framework and ongoing tangata whenua participation provisions.
Takahiwai Māori Committee	Effects on cultural identity, tikanga and kaitiakitanga	Addressed through Attachments 22–24 CIAs, the Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A), Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions) and the updated Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026). MBL’s engagement was undertaken to secure enforceable cultural protections including a Mahere Tikanga Plan, cultural induction requirements, cultural monitoring, adaptive management triggers and environmental restoration initiatives. These measures are intended to ensure tikanga and kaitiakitanga continue to inform project management throughout the life of the consent.	Attachment 22 – CIA Attachment 23 – Draft CIA Attachment 24 – CIA Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026) Sections 2.3, 5.8 and 6.12	Not directly addressed by technical experts. However, the EMMP, Mahere Tikanga Plan, cultural monitoring provisions and adaptive management framework support ongoing tangata whenua involvement and recognition of tikanga values throughout the consent term.
Takahiwai Māori Committee	Intergenerational effects on hapū and whānau	Addressed through long-term monitoring, staged extraction and adaptive management requirements. The updated EMMP (Attachment 29) requires ongoing assessment of ecological recovery, cumulative effects, bathymetric changes and long-term environmental trajectories. Importantly, extraction volumes cannot increase from 150,000 m ³ /year to 250,000 m ³ /year unless monitoring demonstrates that significant adverse ecological, bathymetric and coastal process effects are not occurring. The CIA process also recognises the importance of safeguarding environmental and cultural values for future generations.	Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026) Sections 2.2, 2.5, 6.10 and 6.11 Attachment 26 – Recommended Conditions	No expert directly addresses intergenerational cultural impacts. However, the evidence supports long-term monitoring, recovery assessment, cumulative effects monitoring and staged extraction controls intended to protect environmental values over time.
Takahiwai Māori Committee	Effects on kaimoana, seabed ecology and marine values	Addressed through Attachment 16 – Assessment of Fish and Fisheries Effects (R.O. Boyd), Attachment 12 – Assessment of Benthic Ecology Effects (Bioresearches), Attachment 9 – Assessment of Water Quality Effects (SLR) and Attachment 21 – Assessment of Scleractinian Cup Coral Effects (NIWA). The updated EMMP (Attachment 29) requires monitoring of benthic communities, scallops, sediment composition, ecological recovery and sensitive habitats. Adaptive management responses include increased monitoring, extraction redistribution, exclusion of extraction cells and recovery requirements where monitoring identifies adverse effects.	Attachment 12 – Benthic Ecology Effects Attachment 13 – Seabirds and Shorebirds Effects Attachment 14 – Marine Mammal Effects Attachment 16 – Fish and Fisheries Effects Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	Rick Boyd addresses fisheries productivity and habitat use. Simon West responds to benthic ecology, habitat recovery, uncertainty and cumulative effects. Dr Beaumont addresses cup coral habitats and resilience. The EMMP provides for adaptive management of effects on kaimoana, seabed ecology and marine values.

Takahiwai Māori Committee	Concern that cultural effects cannot be fully remedied by conditions	MBL acknowledges that some cultural concerns may not be capable of being fully resolved through conditions alone. However, the response extends beyond standard consent conditions and includes the cultural commitments identified in Attachment 22 – CIA (Te Pouwhenua o Tiakiriri Kūkupa Trust), the Te Parawhau Joint Memorandum (Attachment 22 Appendix A), the Mahere Tikanga Plan, ongoing cultural monitoring, environmental restoration initiatives, adaptive management triggers and MACA protection mechanisms. Te Pouwhenua's evidence is that these protections were secured through engagement with the application and would not otherwise exist if tangata whenua had chosen not to participate in the process.	Attachment 22 – CIA Attachment 22 (Appendix A) – Joint Memorandum Attachment 26 – Recommended Conditions Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	No technical expert directly addresses this concern because it is fundamentally a cultural values issue. The response remains grounded in the CIAs, Joint Memorandum, Mahere Tikanga Plan, cultural monitoring, environmental restoration initiatives, MACA protections and adaptive management commitments.
Parihaka Waka Ama Club Inc.	Navigation safety for waka ama users	Addressed through Attachment 19 – Assessment of Navigational Safety Effects (B. Goodchild), which assesses vessel movements, collision risks, interactions with recreational users and navigational safety. The assessment concludes that risks can be managed through maritime safety requirements, operational procedures, vessel tracking and communication protocols. Proposed consent conditions require ongoing compliance with navigation safety obligations throughout the life of the Project. I defer to R.Boyd's reply statement of evidence in his Appendix A – Bream Bay Marine Activity People Movement Data Technical Note where <i>the outputs are intended to support interpretation of broad activity patterns</i> which concluded <i>across all reporting categories, more than 99% of observed activity occurred outside the proposed sand extraction area. The data does not indicate that the extraction area is a major concentration point for observed activity within the wider Bream Bay study area.</i>	Attachment 19 – Assessment of Navigational Safety Effects (B. Goodchild) Attachment 27 – Sand Extraction Operation Plan (SEOP) Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions) R.Boyd's reply statement of evidence	Remains addressed by the Navigation Safety Assessment, SEOP and proposed consent conditions.
Parihaka Waka Ama Club Inc.	Vessel interaction risks	Addressed through Attachment 19 – Assessment of Navigational Safety Effects (B. Goodchild). The assessment considers interactions between extraction vessels and recreational users as a manageable risk for the <i>William Fraser</i> . Risks are managed through vessel operating procedures, navigation requirements, communication protocols and maritime safety controls. MBL's position is that vessel interaction risks are low and can be effectively managed. This is further evidenced in R.Boyd's reply statement of evidence in his Appendix A – Bream Bay Marine Activity People Movement Data Technical Note which concluded <i>across all reporting categories, more than 99% of observed activity occurred outside the proposed sand extraction area. The data does not indicate that the extraction area is a major concentration point for observed activity within the wider Bream Bay study area.</i>	Attachment 19 – Assessment of Navigational Safety Effects (B. Goodchild) Attachment 27 – Sand Extraction Operation Plan (SEOP) Attachment 26 – Recommended Resource Consent Conditions (Updated Draft Conditions)	Continues to be addressed through navigational controls, maritime procedures, vessel tracking and operational management measures identified in the Navigation Safety Assessment and SEOP.

Parihaka Waka Ama Club Inc.	Displacement from training and recreational waters	MBL acknowledges concerns regarding use of marine space by waka ama users. However, the extraction area occupies a relatively small portion of the wider bay and does not permanently exclude recreational use from surrounding waters. Attachment 19 – Assessment of Navigational Safety Effects concludes that recreational users can continue to access and navigate the wider area safely, with navigational controls and operational procedures minimising disruption. It is considered a manageable risk for the <i>William Fraser</i> .	Attachment 19 – Navigation Safety Assessment Attachment 27 – SEOP Attachment 26 – Recommended Conditions	The original Navigational Safety Assessment remains the primary response.
Parihaka Waka Ama Club Inc.	Effects on cultural recreation and access to the moana	Cultural and recreational use of the marine environment is recognised through the CIA process, including Attachments 22–24, and through engagement with tangata whenua and community groups. The applicant's position is that the proposal does not prevent access to the wider marine environment. The updated EMMP (Attachment 29) also provides opportunities for tangata whenua participation in monitoring and environmental management, helping ensure ongoing cultural connection with the marine environment.	Attachment 19 – Navigation Safety Assessment Attachment 22 – CIA Attachment 27 – SEOP Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	Not addressed by technical experts. This remains primarily a cultural and recreation issue addressed through the CIAs, consultation process, participation provisions and MBL's position that access to the wider bay remains available.
Parihaka Waka Ama Club Inc.	Concern that dredging operations may affect water quality and amenity	Addressed through Attachment 9 – Assessment of Water Quality Effects (SLR), which concludes that sediment plumes are expected to be localised, temporary and within predicted limits. The updated EMMP (Attachment 29) includes plume monitoring, water quality monitoring, bathymetric surveys and adaptive management triggers. If monitoring identifies effects beyond predicted levels, management responses include increased monitoring, operational changes, extraction redistribution and suspension of activities where necessary.	Attachment 9 – Water Quality Effects Attachment 29 – EMMP Section 6.9 Attachment 26 – Recommended Conditions Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	Simon West addresses ecological effects of sedimentation and monitoring. The concern continues to be primarily addressed through Attachment 9 – Assessment of Water Quality Effects and the strengthened EMMP monitoring framework.
Parihaka Waka Ama Club Inc.	Need for clear operational controls and communication with water users	Addressed through Attachment 27 – Sand Extraction Operation Plan (SEOP), Attachment 19 – Assessment of Navigational Safety Effects (B. Goodchild) and the proposed consent conditions. These documents establish operational procedures, communication requirements, vessel management protocols and navigation safety measures designed to minimise conflicts with other marine users and ensure that recreational and customary users are aware of extraction activities.	Attachment 19 – Navigation Safety Assessment Attachment 27 – SEOP Attachment 26 – Recommended Conditions	No technical expert directly addresses this concern. It remains addressed through the SEOP, Navigation Safety Assessment and proposed consent conditions.
Te Iwitahi Manihera Whānau (24a – correspondence)	Allegation that the wrong tangata whenua were engaged	The applicant's position is that engagement was undertaken with a broad range of tangata whenua groups over several years and included preparation of multiple Cultural Impact Assessments. The application does not seek to determine which parties have the strongest customary interests. Instead, it records engagement undertaken, cultural values identified and differing perspectives expressed by tangata whenua. Ongoing participation opportunities are provided through the updated EMMP (Attachment 29) and associated consent conditions.	Attachment 5 – Consultation Summary Attachment 22 – CIA Attachment 23 – Draft CIA Attachment 24 – CIA	No technical expert addresses consultation scope or engagement decisions. This remains a consultation and process issue addressed through the engagement record and CIA process.
Te Iwitahi Manihera Whānau (24a – correspondence)	Te Iwitahi Manihera whānau interests not adequately recognised	Te Iwitahi Manihera whānau were not made known to MBL, nor were they identified by the Northland Regional Council as a party with whom consultation should be undertaken. Notwithstanding this, the application recognises and provides for relevant cultural interests through the Cultural Impact Assessments (Attachments 22–24), the consultation undertaken with identified tangata whenua, and the broader engagement process (Attachment 5). The Environmental	Attachment 5 – Consultation Summary Attachment 22 – CIA Attachment 22 (Appendix A) – Joint Memorandum	Not addressed by technical experts. Remains addressed through consultation records, CIAs, cultural participation provisions and ongoing engagement opportunities.

		Management and Monitoring Plan (Attachment 29) also provides ongoing opportunities for participation, including review of environmental monitoring reports and the provision of cultural monitoring information (led by Te Parawhau ki Tai), ensuring that cultural values can continue to be considered throughout the life of the consent.		
Te Iwitahi Manihera Whānau (24a – correspondence)	MACA and customary interests not adequately addressed	MBL recognises the existence of MACA and customary interests within the wider project area. The proposal does not seek to determine those interests but instead seeks to recognise them through engagement, the CIA process, proposed cultural monitoring provisions and participation opportunities embedded within the EMMP (Attachment 29) and proposed consent conditions.	Main Application / Assessment of Effects on the Environment Attachment 5 – Consultation Report Attachment 22 – CIA Attachment 23 – Draft CIA Attachment 24 – CIA	No expert directly addresses MACA interests. This is primarily a legal, cultural and governance matter addressed through the CIAs, Joint Memorandum, engagement process and cultural monitoring framework.
Te Iwitahi Manihera Whānau (24a – correspondence)	Consultation process considered deficient	MBL acknowledges that not all parties consider the consultation process to have been adequate. However, the application documents engagement undertaken over several years, preparation of multiple CIAs and ongoing discussions with tangata whenua. The EMMP (Attachment 29) provides continuing opportunities for involvement after consent is granted, including review of monitoring reports, management plan amendments and cultural monitoring outcomes.	Attachment 5 – Consultation Summary Attachment 22 – CIA Attachment 23 – Draft CIA Attachment 24 – CIA Attachment 29 – Environmental Monitoring Management Plan (EMMP) (Updated May 2026)	Not addressed by technical experts. This remains addressed through Attachment 5 – Consultation Report, the CIAs and ongoing participation provisions in the EMMP.
Te Iwitahi Manihera Whānau (24a – correspondence)	Concerns regarding mandate and representation	MBL acknowledges that questions of mandate, representation and customary authority are important matters for tangata whenua. The application does not seek to resolve competing claims regarding representation. Instead, it seeks to recognise cultural interests through broad engagement, multiple CIAs, the Joint Memorandum, proposed cultural monitoring provisions and ongoing participation opportunities within the EMMP (Attachment 29), while avoiding taking a position on questions of customary authority or representation.	Attachment 5 – Consultation Report Attachment 22 – CIA Attachment 22 (Appendix A) – Joint Memorandum	No technical expert addresses mandate or representation issues. The application deliberately avoids determining competing customary claims and instead relies on broad engagement, multiple CIAs and ongoing participation opportunities.