



**RESPONSE TO INVITATION TO COMMENT - BLEDISLOE NORTH WHARF AND
FERGUSSON NORTH BERTH EXTENSION FAST TRACK APPLICATION**

This response is filed for Waikato-Tainui by:

Te Whakakitenga o Waikato Incorporated

PO Box 648

Hamilton 3240

INTRODUCTION

1. This response is made on behalf of Te Whakakitenga o Waikato Incorporated (formerly Waikato-Tainui Te Kauhanganui Incorporated), as the representative body of Waikato-Tainui's 68 marae and 97,000 tribal members.
2. Te Whakakitenga o Waikato Incorporated (Waikato-Tainui) is the governing body for the 33 hapuu and 68 marae of Waikato (see **Appendix A**) and manages the tribal assets for the benefit of over 97,000 registered tribal members.
3. Waikato-Tainui welcomes the opportunity to respond to the "Bledisloe North and Fergusson North Wharf Extensions" fast-track proposal. We wish to be heard in support of this response.

BACKGROUND TO WAIKATO-TAINUI

4. Waikato-Tainui are kaitiaki of our environment and regard the holistic integrated management of all elements of the environment (such as flora, fauna, land, air and water) with utmost importance.
5. Waikato-Tainui are tangata whenua and exercise mana whakahaere within our rohe (tribal region). Our rohe is bounded by Taamaki Makaurau in the north and Te Rohe Pootae (King Country) in the south and extends from the west coast to the mountain ranges of Hapuaokohe and Kaimai in the east. Significant landmarks within the rohe of Waikato-Tainui include the Waikato and Waipaa Rivers, the sacred mountains of Taupiri, Karioi, Pirongia and Maungatautari, and the west coast harbours of Whaaingarua (Raglan), Manukau, Aotea and Kawhia moana, the eastern areas of Tikapa Moana (Firth of Thames), and principally, New Zealand's longest river, Te Awa o Waikato.
6. Both through its hapuu and collectively as an iwi, Waikato-Tainui has maintained ahi kaa, continues to exercise mana whakahaere, rangatiratanga and kaitiakitanga, and upholds and exercises Waikato-Tainui tikanga, kawa, maatauranga and reo within the Waikato-Tainui Rohe.

7. We acknowledge and affirm the intrinsic relationship of Waikato-Tainui with our natural environment, which carries with it both rights and responsibilities as a matter of tikanga and kawa.

WAIKATO-TAINUI OUTSTANDING AND REMAINING CLAIMS

8. Waikato-Tainui continue to negotiate outstanding Treaty of Waitangi claims with the Crown, including matters specific to Taamaki Makaurau. These claims form part of the broader Wai 30 claim and are comprehensive—covering land, coastal and marine areas, and associated social, cultural, and economic interests.
9. The Wai 30 claim, held by Te Whakakitenga o Waikato on behalf of all 33 hapuu of Waikato-Tainui, includes matters originally filed in 1987 that were set aside from the 1995 and 2010 settlements. The Taamaki component, which includes Waitemataa, continues this work.
10. Waikato-Tainui's area of interest in Taamaki Makaurau spans the full coastal marine area—from the high-water mark to the outer Exclusive Economic Zone. This includes the foreshore and seabed of the Waitemataa, as well as adjacent port infrastructure and development zones.
11. The claim encompasses airspace, water space, subsoil, flora and fauna, and all interconnected land and marine elements, including the environmental and cultural impacts of activity within and around the harbour.
12. Redress mechanisms in this regard are still being developed and negotiated with the Crown. In absence of settlement protections for these remaining claims, Waikato-Tainui seeks to provide and secure environmental protections for te taiao through other available pathways.

INTRODUCTION

13. Waikato-Tainui acknowledges the importance of functional port infrastructure but raise concerns regarding the ecological, cultural, and statutory implications of this proposal. Our feedback reflects our responsibilities as kaitiaki and as an iwi with longstanding interests in the Taamaki region.

INADEQUATE CULTURAL RECOGNITION AND PARTNERSHIP

14. We acknowledge that Waikato-Tainui affiliated marae and hapuu will be providing Cultural Impact Assessments (CIA) and feedback, and Waikato-Tainui will provide support where appropriate. As the application stands, however, it does not appear to meaningfully consider the cultural, historical, or ongoing relationships that tangata whenua have with the Waitemataa and its surrounding environment.
15. It is our view that the Waitemataa is not merely a site for infrastructure—it is a taonga of enduring cultural and environmental significance. This proposal sits within a broader context of sustained development pressure across the harbour. From our perspective, there remains an imbalance in how cultural and ecological values are weighed against the demands of infrastructure and growth.
16. The harbour has limited capacity to absorb further development without compounding environmental and cultural impacts and further eroding the relationship that tangata whenua have with the Waitemataa. Based on the information available, engagement does not appear to have occurred at a level that reflects this significance or recognises the role of iwi in shaping decisions that affect their rohe. This remains a key gap—one we expect to be addressed through the forthcoming CIAs and iwi feedback.

ECOLOGICAL EFFECTS AND STATUTORY CLAIMS

17. The proposal presents risks to species and habitats of cultural and ecological importance, as identified in several application assessment documents. It does not fully meet the requirements of relevant environmental legislation and policy, including the Resource Management Act, the New Zealand Coastal Policy Statement, and the Hauraki Gulf Marine Park Act. The affected harbour areas—particularly Significant Ecological Areas—support key foraging, nesting, and migration functions. It is our assessment that these impacts have not been avoided, adequately mitigated, or properly assessed in partnership with appropriate iwi environmental and cultural representatives.

METHODOLOGICAL LIMITATIONS OF THE ECOLOGICAL ASSESSMENT

18. While the ecological impact assessment is based on the EIANZ Guidelines (Roper-Lindsay et al., 2018), it is worth questioning whether a framework originally developed for terrestrial and freshwater ecosystems can fully address the complexity of marine environments. Although efforts have been made to adapt the approach, it remains unclear whether these adaptations are sufficient to reflect the interconnected ecological, cultural, and temporal values that underpin a holistic understanding of impact—particularly from a Maaori perspective.
19. Issues such as cumulative effects, species interrelationships, and intergenerational obligations may not be adequately captured. Further expert ecological and cultural analysis would be required to determine whether the current assessment method provides a robust and comprehensive foundation for marine ecological impact assessment.

PHYSICAL ENVIRONMENT AND HARBOUR DYNAMICS

20. The scale of dredging proposed to enable this extension is significant and could result in permanent changes to the natural character and functioning of the marine environment. This activity further compounds the long-standing degradation of the Waitemataa, which has impacted the ability of iwi to exercise their role as kaitiaki. Despite mana whenua efforts to restore mauri this area has remained polluted for decades. As a result, whaanau have been unable to safely gather kai from these waters for a prolonged period.
21. The harbour's physical environment is complex and ecologically significant, even in its heavily modified state. The proposed construction zones, with depths exceeding 12 metres and moderate tidal flows, provide important sheltered habitats and feeding grounds for taonga species. Dredging and port operations in these areas will disturb the seabed, resuspend legacy contaminants, and damage benthic ecosystems—undermining ecological connectivity and further eroding the mauri of the moana.
22. These cumulative impacts must also be understood within a wider context of weak environmental accountability. For instance, maritime discharges into the harbour — including high-profile incidents involving the release of wastewater directly to the Waitemataa — have resulted in little to no enforcement action.

23. At the same time, port-related activities continue to generate significant revenue, yet there is no clear reinvestment into the restoration or protection of the harbour environment. This disparity underscores a broader failure to prioritise the health of the harbour in decision-making; despite the increasing and ongoing pressures it faces.

WATER QUALITY AND URBAN CONTAMINANT INPUTS

24. Water quality in the Waitemataa Harbour is influenced by both natural tidal exchange and urban inputs, especially stormwater from the Auckland city centre. Data from monitoring sites such as Chelsea Wharf and Freemans Bay reveal persistent levels of suspended sediments, nutrients, heavy metals, and antifoulants. Although average concentrations may remain below regulatory limits, seasonal variation and cumulative inputs are not adequately accounted for.
25. This proposal—particularly its dredging and construction activities—risks further degrading an already stressed harbour environment by disturbing sediments and increasing contaminant loads. These potential effects must be considered in the context of existing water quality pressures, not in isolation.
26. Iwi consider water quality not simply a scientific measure, but a reflection of mauri—the spiritual and life-sustaining essence of the water. Without active cultural monitoring or meaningful mana whenua involvement in water quality management, the proposal fails to uphold its obligations to tangata whenua or recognise the full extent of its environmental and cultural impacts.

SEDIMENT QUALITY AND CONTAMINANT LOADING

27. Legacy contaminants in sediment at the proposed dredging and construction sites pose clear ecological and cultural risks. Disturbing these sediments during construction could release harmful substances into the water column, affecting water quality and accumulating in marine species. This presents a direct threat to taonga species and could undermine the ongoing ability of iwi and hapū to use the harbour for customary purposes. The presence of these contaminants should be taken seriously, and further expert assessment may be required to determine the extent of risk and appropriate management responses.

RECOMMENDATIONS

28. Given the concerns outlined, Waikato-Tainui recommends that the application be declined in its current form. The proposal does not demonstrate full compliance with relevant legislation, and it fails to properly consider or integrate cultural values, ecological risks, and intergenerational responsibilities. If the application is not declined outright, we strongly recommend that it be deferred or suspended until the following are completed:
- a) Full compliance with any conditions or recommendations arising from Cultural Impact Assessments (CIAs) submitted by relevant iwi and hapuu, with these to be fully integrated into the planning and decision-making process.
 - b) A tikanga-based monitoring and mitigation framework for both construction and long-term operations
 - c) Revision of ecological assessments to incorporate marine-specific dynamics, cumulative effects, and maatauranga Maaori.

CONCLUSION

29. The Waitemataa is a taonga with enduring cultural, environmental, and spiritual significance. Its mauri is directly tied to the ability of tangata whenua to exercise kaitiakitanga and maintain their relationship with the harbour. Any further development must be carefully assessed to ensure it does not cause irreversible harm. Waikato-Tainui urges the Panel to withhold any decision until Cultural Impact Assessments from relevant marae, hapuu and iwi have been completed and meaningfully considered. These assessments are essential to understanding the full cultural and environmental implications of the proposal and must be integrated into the decision-making process.

DATED

27 JUNE 2025

TE WHAKAKITENGA O WAIKATO INCORPORATED

Address for Service:

Te Maakariini Mapu

Telephone:

██████████

APPENDICES

APPENDIX A – Waikato-Tainui 68 Marae



