

Ruakākā Reserve Board comment on the Bream Bay Sand Extraction project

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to substantive@fasttrack.govt.nz.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Ruakākā Reserve Board		
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2. We will email you draft conditions of consent for your comment			
<input checked="" type="checkbox"/>	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct

Please provide your comments below, include additional pages as needed.



Thank you for the invitation to comment on the Bream Bay Sand Extraction Project application, under section 53 of the Fast-track Approvals Act 2025.

We oppose the application.

Who are we?

The Ruakākā Reserve Board was created pursuant to the Reserves Act 1977 (the “Act”).

The Act has three main functions:

- To provide for the preservation and management, for the benefit and enjoyment of the public, areas possessing some special feature or values such as recreational use, wildlife, landscape amenity or scenic value. For example, the Reserve may have value for recreation, education, as wildlife habitat or as an interesting landscape;
- To ensure, as far as practicable, the preservation of representative natural ecosystems or landscapes and the survival of indigenous species of flora and fauna, both rare and commonplace; and
- To ensure, as far as practicable, the preservation of access for the public to the coastline, islands, lakeshore and riverbanks and to encourage the protection and preservation of the natural character of these areas.

The role of the Ruakākā Reserve Board Inc (“Board”) is to govern the Ruakākā Recreation Reserve (“Reserve”) for the Department of Conservation (“DOC”) and it is set apart as a Camping Groundⁱ. A key purpose of the Board is to manage the land for the physical welfare and enjoyment of the public and for protection of the natural environment and beauty.ⁱⁱ

The organisation governed by the Board is a standalone entity with no separate operating units or divisions, and regular meetings are held.

Less than a two-hour drive from Auckland and 20 minutes from Whangarei, the Reserve is an easily accessible destination for visitors. Fishing, boating, sailing, swimming, surfing, sunbathing, picnicking and camping are all popular. The growing towns of One Tree Point, Ruakākā and Waipu service both visitors and an increasing number of permanent residents.

The Te Ākau Bream Bay coastline is special, with its long sweeping curve of sandy beach, estuaries and river mouths, low rolling dune-lands and bush-clad hinterland.ⁱⁱⁱ The combination of natural, historic and recreational values makes the Te Ākau Bream Bay coast a significant area for conservation.^{iv}

The coastal sand dunes bordering the Ruakākā Reserve are of paramount importance in protecting the Reserve from erosion by the sea.

Ruakākā Beach Camping Ground or Holiday Park sits on 13.8 hectares of Department of Conservation reserve land, bordered one side by the Ruakākā River tidal estuary and it lies behind the sand dunes of the Ruakākā surf beach towards the north of Te Ākau Bream Bay and directly opposite the proposed sandmining catchment.

The Reserve has been part of the community since the 1930s and can be described as the quintessential kiwi camping ground with token hot water amenities and communal facilities.

We offer a range of accommodation options: basic cabins, water view cabins, powered and non-powered sites, and water view sites. Tents, caravans, and campervans are welcome on all sites, so everyone can find a place to stay.



Figure 1: Map of the Ruakākā Camping Ground 2025

As a not-for-profit Reserve, all camping fees are reinvested into improvements and future projects, guided by feedback from our campers.

We welcome our guests (manuhiri) with warmth and respect (manaakitanga) and take pride in looking after this special place (kaitiakitanga). Sustainability is at the heart of what we do, as we aim to protect the environment and create a place for families to enjoy for generations to come.

Guests are often generational with families, recreational fisher people, surfers, as well as domestic and international tourists who want to experience the beautiful coastline, river and beach with the ability to see native marine and birdlife in their natural settings. The estuary is safe to swim in and is home to many bird species. The surf beach is patrolled in the summer season by the Ruakākā Surf Lifesaving club.



Photo 1: Ruakākā River Estuary to Sandspit

At full capacity the camping ground can host **2000** people a day. In 2025 the campground provided **28,390** bed nights and the guests came from all over New Zealand and the world:

Guests Origin Report

Between Wed 1 Jan 2025 and Sat 31 Jan 2026 (Inclusive)

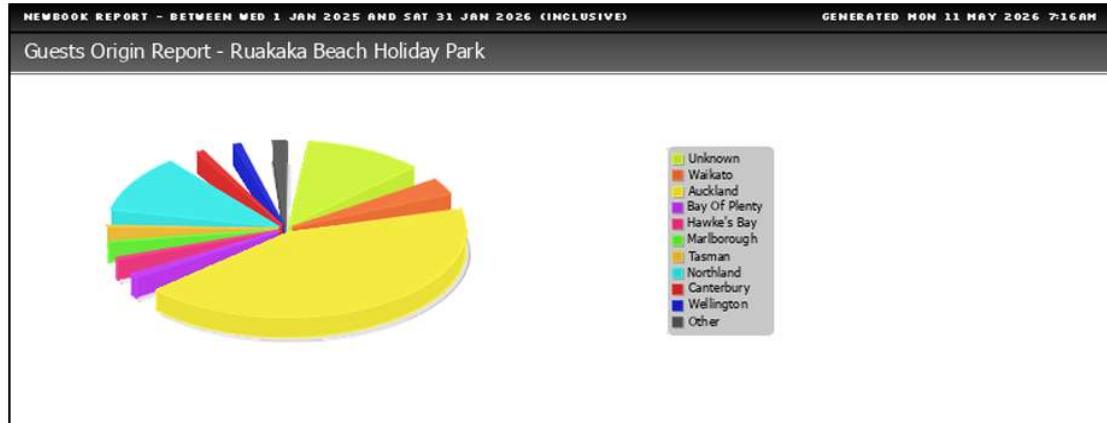


Figure 2: Guest Origin Report 2025

New Zealand based tourists stay an average of 4 nights and in 2025 the 890 international tourists generally stayed 1-2 nights.

Birdlife

Ruakākā beach and the Ruakākā estuary are crucial habitats for several species of nationally endangered and threatened shorebirds in Te Ākau Bream Bay.

The Ruakākā estuary is an established wildlife refuge^v managed by the Department of Conservation and it is highly popular for birdwatching by ornithologists and nature enthusiasts year-round. It is a major migratory habitat for the Bar-Tailed Godwit and a primary breeding ground of the New Zealand Dotterel.

Country	Bookings Placed	Booking Percentage
Slovakia	1	0.01%
Hungary	1	0.01%
Ukraine	1	0.01%
Estonia	1	0.01%
Uruguay	1	0.01%
Guatemala	1	0.01%
Malaysia	1	0.01%
Thailand	1	0.01%
South Korea (the Republic of)	1	0.01%
Singapore	1	0.01%
Taiwan	1	0.01%
Andorra	1	0.01%
Czech Republic (the)	2	0.03%
New Caledonia	2	0.03%
China	2	0.03%
Italy	2	0.03%
Chile	3	0.04%
Sweden	3	0.04%
Finland	3	0.04%
Hong Kong	3	0.04%
Norway	4	0.06%
Brazil	4	0.06%
Japan	4	0.06%
Spain	5	0.08%
Ireland	5	0.08%
French Polynesia	5	0.08%
Israel	7	0.11%
Belgium	11	0.18%
Austria	14	0.23%
Denmark	15	0.24%
Unknown	24	0.39%
Canada	25	0.41%
United States of America	60	0.99%
Netherlands (the)	68	1.13%
Switzerland	74	1.23%
France	85	1.41%
United Kingdom	109	1.81%
Australia	128	2.12%
Germany	211	3.50%
International Total	890	14.79%

Figure 3: International Guests Origin Report 2025

Threatened species present in the immediate area include: Northern New Zealand Dotterel, Banded Dotterel, Red-billed Gull, Caspian Tern, the Lesser Knot.

The “At Risk” species include: White-fronted Tern, Oystercatchers, Little Penguin, Bar-tailed Godwit, and Shags.

These species use the area for feeding and roosting and are more concentrated near the Ruakākā estuary. New Zealand Dotterel and Variable Oystercatcher breed on the coast either side of Waipu and Ruakākā estuaries. The New Zealand Fairy Tern uses the coastal strip for feeding.

Key Endangered Bird Species at Ruakākā Beach:

- **New Zealand Fairy Tern (Tara Iti):** One of the country's critically endangered birds, with nesting sites in the wider area and sometimes appearing in the estuary.
- **Northern NZ Dotterel (Tūturiwhatu):** Endangered species that breed on the sandy coast and near the estuary.
- **Black-billed Gull (Tarāpuka):** Classified as endangered (threatened).
- **Banded Dotterel (Pohowera):** A threatened species that nests in the area.
- **Bar-tailed Godwit (Kuaka):** Endangered migratory shorebirds that use the estuary as a high-tide roosting spot.
- **Variable Oystercatcher (Tōrea Pango):** Often seen feeding at the river mouth.

These birds nest directly on the sand and shells, making them highly vulnerable to disturbance.

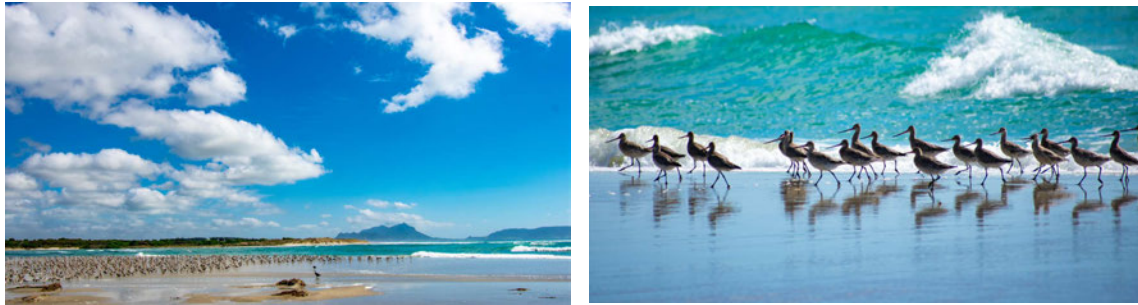


Photo2 and 2a: Bar-tailed Godwits sheltering on the spit 2022

The freshwater mangrove area extending around the Reserve also provides a home to endangered **Australasian bittern (Matuku-hūrepo)**.^{vi}

The Ruakākā estuary entrance and beach are critically important for the Bar-Tailed Godwit and Lesser Knot that use and generally roost in Whangarei Harbour (up to 5,000 birds) but move south to use this area during very high tides. This area must be protected if the large numbers of birds reliant on this important ecosystem are to have any chance of survival.^{vii}

Additionally, the **Shore skink** (*Oligosoma smithi*) has been observed to the north of the Ruakākā Wildlife Refuge and southwards to near the Waipu Wildlife Refuge, from near mean high spring tide area and back into the rear dunes.

Marinelife

The Northland Regional Coastal Plan zones the Te Ākau Bream Bay coast into two areas. Marine 1 (Protection) Management Areas are those identified by the Minister of Conservation as being Areas of Significant Conservation Value. The priority in these areas is the protection of the significant conservation values identified as occurring within each particular area, including the Ruakākā and Waipu estuaries, inland to the Coastal Marine Area (saline) boundary and including the sand spits. They extend approximately 500m offshore.^{viii}

The remainder of the Te Ākau Bream Bay coast is zoned as Marine 2 (Conservation) Management Area, to be managed to conserve and enhance ecological, cultural and amenity values.^{ix}

Bottle Nose and **Common Dolphins** live in Te Ākau Bream Bay all year round with pods of bottlenosed dolphins often seen out from the Ruakākā and Waipu estuaries.



Photo 3 and 3a: Bottlenose dolphins off Ruakākā beach 2026

Orca, Pilot and large Baleen Whales also regular visitors to the Te Ākau Bream Bay and surrounding islands.

Te Ākau Bream Bay is also significant habitat for the endangered **Hawksbill turtles** and **Leatherback turtles** have been observed in the area.

Three Mile Reef is directly off the beach in front of the Ruakākā Reserve. The reef is sizeable in area, being close to 1.5 - 2km across^x and is a significant fishing ground, highly regarded by local anglers for producing quality fish, particularly during summer. It serves as a key recreational and commercial fishing spot, known for snapper, kingfish, and other inshore species. The area forms part of the wider, highly productive Te Ākau Bream Bay ecosystem, which includes high-quality soft-bottom habitats and shallow reef systems that provide essential feeding and nursery grounds for our coastal fishery.

- **Stony corals**—specifically solitary, non-reef-building cup corals (Order Scleractinia)—are also present at Three Mile Reef. These stony corals are important biodiversity components in New Zealand's coastal ecosystems and are protected under the Wildlife Act 1953.^{xi} The application acknowledges they are present in the proposed area of operation and will be killed.^{xii}

- Much of Three Mile Reef appears to be contain patch reef and complex edge marine communities between the soft sediment and hard reef which are considered ecologically important; many species forage between the two habitats or use the reef edge and reef to seek shelter.

Commercial species occurring in the Te Ākau Bream Bay area include rock lobsters, scallops, paddle crabs, whelks, cockles and pipi.

- The **paddle crab (pāpaka)** fishery is regionally significant and in most recent years has generated between two thirds and 100% of all commercial catches of this species throughout the country. Whelks are not targeted but attracted to the bait in the traps and are a saleable minor bycatch.
- **Scallops (tipa)** can usually be found in low densities throughout Te Ākau Bream Bay from shallow waters to depths of 50m. Recently, following monitoring indicating the deteriorating state of Northland’s scallop fisheries, the Minister for Fisheries and Oceans closed the entire Northland commercial and non-commercial scallop fishery on 1 April 2022 due to sustainability concerns. The closure includes the waters of Te Ākau Bream Bay.
- **Crayfish (koura).** A five-year ban on taking spiny rock lobster (red crayfish) now applies to the entire East Coast of Northland, including Te Ākau Bream Bay, effective from **April 1, 2026**. The closure extends from Pārengarenga Harbour to Cape Rodney because of low stock numbers. Both commercial and recreational fishing are prohibited.
- **Tuatua.** Historically there are Tuatua beds off the beach on both sides of the Ruakākā estuary, but they have been difficult to find in recent years due to commercial trawling of the bay. Tuatua are ecological markers of fine, clean, fluid sands on ocean beaches with moderate wave exposure.

Clearly the marine life in Te Ākau Bream Bay is already struggling and adding another threat by allowing sandmining along the coast will be disastrous especially to the marine mammals such as the bottlenosed dolphins that live year around directly in the proposed sandmining area.^{xiii}

Surf Beach

The surf beach is patrolled at peak season and attracts hundreds of people to the beautiful white sand beach to surf and swim. For surfers the beach offers a break with consistent, user-friendly waves suitable for all levels, particularly beginners and intermediates. The wave break features both left and right-handers.



Photo 4: Ruakākā surf beach on 1 March 2026

The beach is part of the Ruakākā Pipeline Road Track, a 5.8 km coastal path offering easy, scenic walking alongside the sand dunes, popular with international hikers. Ideal for leisurely coastal views, the track provides stunning views of the Hen (Taranga) and Chicken (Marotere) Islands with opportunities to walk down to the sea.

The camping ground provides accommodation for hikers on the track.

The Ruakākā Surf Life Saving Patrol has been a valued part of the Northland community, keeping locals and visitors safe on the beautiful white sands of Ruakākā Beach for over 65 years. It provides training to junior life savers, and the camping ground provides accommodation to visitors during national competitions. The club features a strong focus on surf sports for all ages, including Inflatable Rescue Boat (IRB) racing, beach sprints, and swimming. It is a prominent venue for Northern Region competitions, including IRB championships and various junior and senior surf sports events.

Coastal Dunes

The sand dunes of the Ruakākā Surf Beach provide protection to the Reserve from rising sea levels.

Current legislation and policy all protect these sand dune areas as an important natural ecosystem supporting the stability of the coastline and providing key habitat to a wide range of protected species. The coastal environment here contains landscapes, landforms and geological features acknowledged to be of special significance to tangata whenua and the wider community.^{xiv}

The Ruakākā Scenic Reserve is protected for its scenic interest, native flora, and fauna under section 19 of the Act.

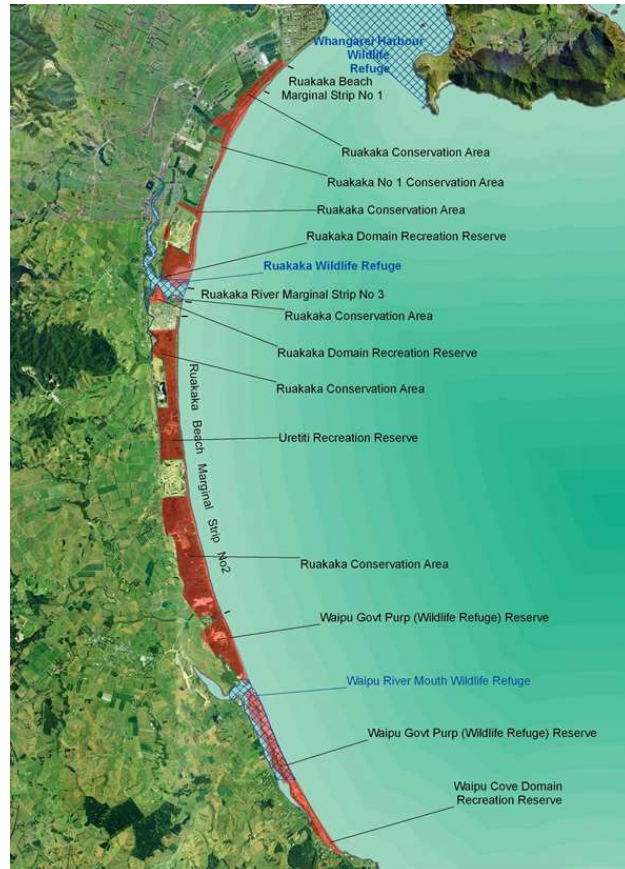


Figure 4: Land Status - Public Conservation Lands of Te Ākau Bream Bay^{xv}

Additional areas are protected and managed by the Department of Conservation in terms of the Conservation Act 1987, the Reserves Act 1977 and the Wildlife Act 1953:

- **Ruakākā River Forest Remnants:** Designated areas (Level 1 sites) recognizing high-value ecological habitats;
- **Ruakākā River Estuary:** Identified as a significant natural area (Q07/130).
- **Ruakākā Dunelands:** Coastal protection area (Q07/128).
- **Uretiti Scenic/Recreation Reserve:** Located just south of Ruakākā, managed by DOC.
- **Marsden Bay Reserve:** A reserve area near the Marsden Point

The sand dunes directly in front of the Ruakākā Reserve protect the area from erosion and the sea.

This proposal to eventually remove two hundred and fifty thousand cubic metres of sand annually gives us grave concern as to the erosion effect on the dunes and ultimately Ruakākā Reserve.

Marine sandmining has a poor track record. For instance:

1. **Sand mining at Parengarenga Harbour**, particularly at the northern end of Kokota Spit, caused significant geomorphic changes, including the potential loss of a large, high dune. Long-term extraction (approximately 50,000 tonnes/year) altered the natural landscape and impacted the ecological balance of the harbour entrance.

Key effects and environmental impacts of mining in this area included:

- **Geomorphic Changes:** Historical mining has led to the loss of natural sand dunes and changed the coastal morphology at the northern end of the spit.
 - **Impacts on Biodiversity:** Dredging activities disturb bottom communities and impact marine habitats.
 - **Sedimentation and Erosion:** Concerns exist regarding increased rates of estuarine sedimentation and disruption to the natural movement of sand, which may contribute to erosion.
2. **Pouto Sand Extraction and Shoreline Erosion.** Concerns were raised over the level of erosion that is occurring along the Pouto shoreline. Recent episodes of erosion have made sections of the shoreline impassable by vehicle at times of high water. Local residents and iwi blame the extraction of sand as the cause of erosion.

Monitoring has shown huge natural fluctuations in sand volumes along this section of shoreline:

- The total cumulative volume of sand extracted from the Pouto shoreline (based on known records) was just under 1,000,000m³. The net change in shoreline volume (above MSL) over the last decade has been a loss of approximately 1,000,000m³, approximately equalling the total volume that had been extracted.^{xvi}

3. **Sand mining at Pākiri Beach** is believed to have caused significant environmental damage, including severe coastal erosion, the destruction of coastal ecosystems, and the removal of breeding habitats for endangered bird species like the New Zealand Fairy Tern.



Photo 5: The William Fraser' operated by McCallum Bros Limited ('MBL')

It has been reported that independent studies found evidence of large, kilometres-long trenches in the seabed and a loss of ecological, cultural, and recreational value along the coast, leading to legal action to restrict further extraction.^{xvii}

- **Coastal Erosion & Dune Damage:** Sand mining removed large volumes of sand, preventing the natural replenishment of the beach and leading to the disappearance of sand dunes. This has caused the shoreline to erode significantly, leaving exposed roots and increasing the risk of collapse.

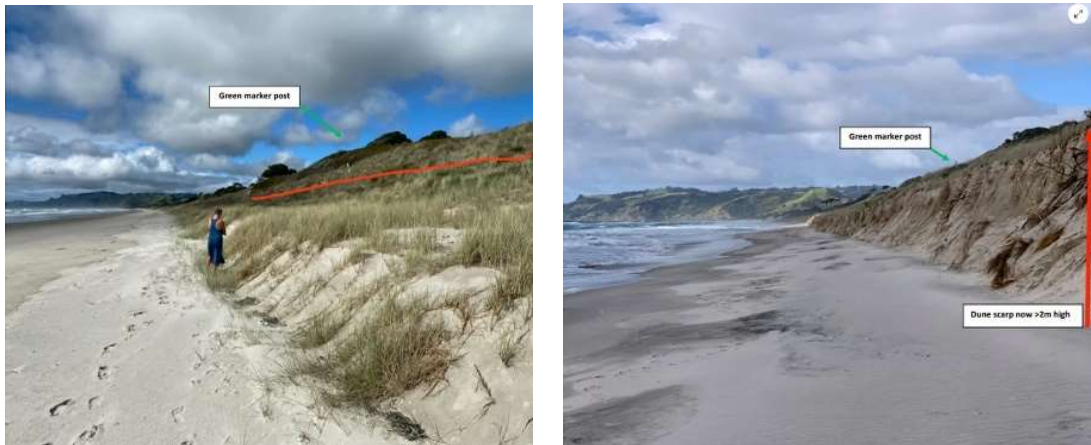


Figure 6a and 6b demonstrating the eroded sand dunes at Pakiri Beach^{xviii}

- **Seabed Destruction:** Dredging created deep trenches—approximately 20m wide and several kilometres long—in the seafloor, which destroyed seabed habitats and removed shellfish and seagrass, affecting fish populations and causing a decline in local marine life.

- **Threat to Endangered Wildlife:** The depletion of the beach and its natural food sources, such as benthic biota, reduced the availability of food for the endangered New Zealand Fairy Tern. Loss of beach width has also caused birds to nest closer to the sea, making them more vulnerable to high tide surges.^{xxix}
- **Consent Breaches:** Investigations are reported to have highlighted historical poor performance, including breaches of consents, mining outside legal boundaries, and deep trenches in the seabed.^{xxx}
- **Environmental Court Rulings:** In 2022, an Auckland Council panel rejected a resource consent application by the applicant for continued mining, citing a lack of evidence that the operations did not harm the seabed and marine life.

That decision was upheld by the Environment Court in 2023 and again by the High Court in 2024.

- **Ecological Impact:** In March 2025, an ecological consultancy discovered protected stony coral in a dredging area. Allegations surfaced that dredging continued for months after the discovery, leading to a Department of Conservation investigation.^{xxxi}

Environmentalists warn that suction dredging disrupts marine ecosystems, creating dead zones, reducing oxygen levels, and destroying benthic invertebrates, threatening the biodiversity of areas like Bream Bay.^{xxii}

We believe the Applicant is essentially seeking to shift the Pākiri Beach sandmining operation around the corner and 25 kilometres north to another fragile environment with the probable outcome of causing the same destruction to the marine and coastal ecosystems.

Erosion of the coastal sand dunes to the extent demonstrated at Pākiri Beach would be devastating to all aspects of the Reserve and protected wildlife.

Alternatives for the Applicant

There are many companies in this immediate area that provide sand for construction purposes in Auckland, Whangarei and Northland but they successfully mine land-based sand deposits. For instance, the extensive operations at Portland by Golden Bay Cement^{xxiii} (commenced 1916) and the Semenoff Group (commenced in the 1960s) at Ruakākā.^{xxiv} These commercial operations have operated locally for decades and support the local community. Both companies take pride in their contributions to Te Ākau Bream Bay probably because they and their children live and work in the area.

This application specifies the intention to extract marine sand to supply the Auckland construction industry for high-strength concrete. Marine sand is not suitable for construction cement. Sand for construction must be washed with fresh water to remove chlorides (salt) and organic impurities. Using salt-contaminated sand causes severe corrosion of reinforcing steel (rebar), leading to concrete cracking, weakening, and premature structural failure.^{xxv}

Currently 75% of all of Auckland sand comes from more sustainable alternatives such as: manufactured sand (m-sand) from quarry rock, recycled crushed glass, and enhanced land-based quarrying. Technologies like Kayasand utilize quarry by-products to produce high-quality concrete sand, with the capacity to meet demand without destroying marine ecosystems.^{xxvi}

We contend that there is no demand for marine sand that necessitates the granting of this application or outweighs the risk to this coastal environment that contains landscapes, landforms, and geological features acknowledged to be of special significance to tangata whenua and the wider community and has been recognised in legislation as deserving of protection.^{xxvii}

The application should not be granted as it endangers the Reserve which is protected for its scenic interest, native flora, and fauna under section 19 of the Act.

Protecting Our Coastline and Moana for Future Generations

We are concerned that the potential impacts of sand mining and dredging on the Te Ākau Bream Bay coastal environment would be significant and far-reaching. Te Ākau Bream Bay is an environmentally, culturally and recreationally important coastal area; the beach, dunes, marine habitats, and surrounding ecosystems provide natural protection, sustain marine biodiversity, support local livelihoods, and hold deep cultural significance for tangata whenua and our community.

We understand that the potential environmental effects of sand mining and dredging on this coastal and marine environment could include:

- Increased coastal erosion and instability of beaches and sand dunes;
- A “pull effect” causing sand dunes and beachfront areas to be dragged out to sea;
- Loss of natural storm protection provided by dunes and sandbanks;
- Saltwater intrusion into the Ruakākā estuary wetlands and groundwater systems;
- Destruction of seabed habitats used for spawning and nursery grounds for fish;
- Reduced water quality and increased sediment in the water, affecting marine life and marine plant growth;
- Smothering of shellfish beds and benthic organisms by disturbed sediment;
- Depletion of fish, shellfish, and other marine species due to habitat disturbance;
- Disruption of migration routes and feeding patterns for endangered marine mammals and seabirds;
- Noise pollution from dredging and machinery disturbing dolphins, whales, seals, and birdlife;
- Disruption to the sonar and navigation systems used by dolphins, orca, whales, and seals due to underwater noise and vibration;
- Changes to tidal currents and wave patterns, affecting our beaches and estuary systems;
- Decline in biodiversity due to habitat loss and ecosystem imbalance;

- Increased risk of algal blooms caused by disturbance of nutrients trapped within seabed sediments;
- Damage to seagrass meadows and kelp forests that support juvenile fish and marine ecosystems;
- Long-term recovery times for marine ecosystems once extraction activities cease;
- Greater vulnerability of coastline infrastructure and properties during storms and king tides;
- Possible release of contaminants trapped within seabed sediments;
- Interference with natural sand replenishment processes along the coastline;
- Bird nesting and breeding habitat disruption, especially for endangered coastal shorebirds;
- Impacts on culturally significant sites and traditional food gathering areas;
- Reduction in the recreational and tourism value of our beaches and marine reserves;
- Negative impacts on the health and regeneration of the Reotahi Marine Reserve ecosystem.^{xxviii}

SUMMARY

The Ruakākā Reserve Board’s legislated focus is on protecting and preserving our coastline, environment, and sea life for future generations. There is real risk of permanent damage through marine sand dredging. As kaitiaki (guardians) of our whenua (land) and moana (sea), we have a responsibility to care for and protect these natural taonga (treasures). The health of our beaches, sand dunes, marine life, and ecosystems should be safeguarded to ensure they remain for our tamariki (children) and future generations to enjoy.

Sand dredging could cause irreversible environmental impacts across Te Ākau Bream Bay, including coastal erosion, depletion of marine species, disruption to marine mammals such as dolphins, orca, whales, and seals, and long-term damage to fragile coastal ecosystems.

In particular, the sandmining operation threatens the stability of the coastline and dunes that are a key habitat to a wide range of protected species.

Changes to tidal patterns, seabed habitats, and water quality may also have ongoing consequences for biodiversity and the overall health of the moana. We believe any future planning for Te Ākau Bream Bay should be centred on sustainability, protection of biodiversity, and respect for the balance of the natural environment — working with nature, not against it.

The coastline and marine ecosystems of Te Ākau Bream Bay are not only resources for today, but a legacy for future generations. Once these environments are damaged, recovery may take decades, and the impacts may be irreversible.

The application has provided no demonstrable benefit for the Te Ākau Bream Bay area.

For these reasons, we oppose sand dredging activities in Te Ākau Bream Bay and support the long-term protection and preservation of our coastal and marine environment.

We submit that the obligations under the *Reserves Act 1977*, the *Wildlife Act 1953*, and the *Conservation Act 1987* must be given priority to ensure the survival of all indigenous species of flora and fauna, both rare and commonplace, in their natural communities and habitats of Te Ākau Bream Bay, particularly those areas already designated as reserves.^{xxix}

The obligation is on the Panel to prioritise the preservation of the natural character of the coastal environment, and the preservation of the natural ecosystems, wildlife and landscape which gives Te Ākau Bream Bay its own recognisable character.

John Keaney
Deputy Chair

On behalf of the Ruakākā Reserve Board Inc

ⁱ Trading as the Ruakākā Beach Holiday Park www.motorcamp.nz

ⁱⁱ *The Reserves Act 1977 Section 17*

ⁱⁱⁱ www.doc.govt.nz/documents/conservation/land-and-freshwater/land/bream-bay-strategic-plan-2006.pdf

^{iv} www.doc.govt.nz/documents/conservation/land-and-freshwater/land/bream-bay-strategic-plan-2006.pdf

^v The Ruakākā Wildlife Refuge was gazetted in 1958, with an area of 206 acres [83ha] - primarily foreshore and seabed but with a relatively small area of Crown Land on the northern shore. [NZ Gazette 1958/1553]

^{vi} <https://www.nrc.govt.nz/media/ll1edk2f/seas-coastal-and-island-birds-bream-bay-except-waipu-and-ruakaka-estuaries.pdf>

^{vii} www.doc.govt.nz/globalassets/documents/conservation/land-and-freshwater/land/bream-bay-strategic-plan-2006.pdf

^{viii} Marine 1 [Protection] encompasses regionally significant sites of special ecological, cultural, historic, scientific, scenic, landscape and amenity value, including those identified by the Minister of Conservation as being Areas of Significant Conservation Value. The priority in these areas is the protection of those significant conservation values identified as occurring within each area.

^{ix} Marine 2 [Conservation] covers those areas not included in the other management areas and encompasses the greater proportion of Northland's CMA. Development in these areas is to be managed so as to maintain, and where practical, enhance natural, cultural and amenity values.

^x Three Mile Reef, Bream Bay: A Photographic Survey June 2016

^{xi} www.fasttrack.govt.nz/__data/assets/pdf_file/0023/20867/05-Attachment-Five-Consultation-Summary_Redacted.pdf

^{xii} Paragraph 1.19. *The overall live population of the two species of cup corals within the 15.4 km² sand extraction area could be in the order of millions. While the proportion of corals that will be damaged or killed as they pass through the sand extraction process is unknown ... Any killing of cup corals is incidental to the*

monitoring and sand extraction process. It is not directly intended but is to a degree unavoidable and foreseeable as a consequence of carrying out monitoring and the sand extraction...

^{xiii} The *Wildlife Act 1953 section 67A* provides for penalties for offences in respect of absolutely protected wildlife including fines of (a) in the case of an individual, imprisonment for a term not exceeding 2 years or a fine not exceeding \$100,000, or both: and (b) in the case of a body corporate, a fine not exceeding \$200,000.

^{xiv} www.doc.govt.nz/globalassets/documents/conservation/land-and-freshwater/land/bream-bay-strategic-plan-2006.pdf

^{xv} www.doc.govt.nz/about-us/science-publications/conservation-publications/land-and-freshwater/land/bream-bay-strategic-plan/

^{xvi} <https://www.nrc.govt.nz/media/nuidx5e4/naturalcharacterofthecoast.pdf>

^{xvii} www.nzherald.co.nz/nz/pakiri-sand-mining-gouging-trenches-in-sea-floor-locals-and-iwi-opposing-consent-renewal

^{xviii} www.endangeredspecies.org.nz/post/communities-object-to-continued-sand-mining-at-mangawhai-pakiri

^{xix} www.endangeredspecies.org.nz/post/communities-object-to-continued-sand-mining-at-mangawhai-pakiri

^{xx} www.rnz.co.nz/programmes/in-depth-special-projects/story/2018937824/why-pakiri-locals-fear-the-government-s-fast-track-bill-could-steal-away-protection-of-their-pristine-coastline

^{xxi} www.doc.govt.nz/news/media-releases/2026-media-releases/doc-statement-stony-coral-investigation/

^{xxii} www.savebreambaysand.org

^{xxiii} www.goldenbay.co.nz/about-us/our-profile

^{xxiv} www.semenoffgroup.co.nz/start/semenoff-sand/

^{xxv} International Journal of Advances in Engineering and Management (IJAEM) Volume 4, Issue 5 May 2022, pp: 2392-2396 www.ijaem.net ISSN: 2395-5252

^{xxvi} <https://www.mangawhaiharbourrestorationsociety.com/sand-mining>

^{xxvii} www.doc.govt.nz/globalassets/documents/conservation/land-and-freshwater/land/bream-bay-strategic-plan-2006.pdf

^{xxviii} The Reotahi Marine Reserve (Motukaroro) is located at the southern end of McLeod Bay in the Whangārei Heads area of Northland, New Zealand.

^{xxix} *The Reserves Act 1977 Section 3*