

BEFORE THE EXPERT PANEL

FTAA 2511 1150

UNDER THE

FAST TRACK APPROVALS ACT 2024 (FTAA or Act)

IN THE MATTER OF

a substantive application by McCallum Bros Limited
for the Te Ākau Bream Bay Sand Extraction Project
located at Te Ākau Bream Bay, Northland

**STATEMENT OF EVIDENCE OF GEORGINA OLSEN ON BEHALF OF TE
POUWHENUA O TIAKIRIRI KUKUPA TRUST (TE PARAWHAU KI TAI)**

Dated 25 May 2026

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1 Executive Summary

- 1.1 I prepared a Cultural Impact Assessment (CIA) on behalf of Te Parawhau Hapū in relation to the McCallum Brothers Limited (MBL) sand extraction proposal at Paepae Atua. This evidence is provided in my capacity as CIA kaituhituhi and Kaiwhakahaere of the Te Parawhau Resource Management Unit.
- 1.2 The CIA identifies Paepae Atua as a significant ancestral taiao of Te Parawhau Hapū, embedded within whakapapa and extending across the moana, takutai, and adjoining whenua from Te Pae o Tū to Taranga and beyond. Within this ancestral taiao, Paepae Atua is recognised as the seat of ngā atua.
- 1.3 The sand resource is understood as a living expression of tātai, mauri, and mana, forming part of the interconnected relationships that sustain the taiao and ngā tāngata who remain connected to it as ahi kā and tāngata whenua.
- 1.4 The proposed sand extraction is an intervention into a living ancestral taiao and has the potential to adversely affect the mauri of Paepae Atua and the ability of Te Parawhau to exercise tiakitanga.
- 1.5 In my opinion, these effects cannot be appropriately addressed unless the mahi whakaora framework is fully embedded and enforceable through consent conditions.
- 1.6 While technical assessments conclude that effects are low or less than minor, those assessments do not fully capture the cultural dimensions of effect.
- 1.7 Monitoring alone is not sufficient. Monitoring must be supported by adaptive management grounded in mātauranga Māori and tikanga, enabling timely responses to adverse effects on the taiao.
- 1.8 Active involvement of Te Parawhau Hapū in monitoring, interpretation, and decision-making is essential.

- 1.9 These matters are addressed through the mahi whakaora framework, which is grounded in ngā uara ahurea o Te Parawhau Hapū and provides a comprehensive approach to managing effects.
- 1.10 Cultural effects can only be appropriately addressed where this framework is fully embedded and enforceable.
- 1.11 Te Parawhau ki Tai, on behalf of Te Parawhau Hapū, has reached a position of conditional support.
- 1.12 Without these measures, cultural effects would remain significant.

2 INTRODUCTION

Ko Muarangi te maunga

Ko Te Wairoa te awa

Ko Kaipara te wahapū

Ko Waikaretu te marae

Ko Mahuhukiterangi te waka

Ko Ngāti Whātua me Muaupoko me Ngāti Porou ngā iwi

Ko Te Uri o Hau te hapū

No Pouto ahau

Kei Tutukākā ahau e noho ana

Ko Georgina Olsen tōku ingoa

Ko au te Kaiwhakahaere o Te Parawhau Hapū mō te Taiao Rōpū.

He planner me landscape architect ahau, ā e mahi tahi ana au ki te taha o ngā hapū maha i roto i te taiao nei.

- 2.1 I provide this evidence on behalf of Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai).
- 2.2 I am the author of the Cultural Impact Assessment (CIA) dated January 2026 prepared in relation to the McCallum Brothers Limited (MBL) sand extraction proposal at Paepae Atua.
- 2.3 This evidence addresses:
 - the process undertaken in preparing the CIA;
 - materials reviewed and basis of my assessment;
 - key cultural effects and findings;
 - the mahi whakaora framework;
 - review of proposed conditions and management plans; and
 - my conclusions and recommendations.

3 QUALIFICATIONS, EXPERIENCE AND CODE OF CONDUCT

- 3.1 I am a planner and landscape architect, and Director of Landform Consulting, with over 20 years' experience in environmental planning, landscape architecture, and resource management across Aotearoa New Zealand and Australia.
- 3.2 I hold a Master of Planning Practice (Hons), a Bachelor of Landscape Architecture, and a Diploma in Architectural Technology.
- 3.3 I am Kaiwhakahaere of the Te Parawhau Hapū Resource Management Unit, where I lead cultural assessment, hapū engagement, and environmental planning processes on behalf of Te Parawhau Hapū.
- 3.4 I have worked with Te Parawhau Hapū and Te Pouwhenua o Tiakiriri Kūkupa Trust for approximately nine years and continue to do so, supporting the development and application of hapū-led frameworks, including ngā uara ahurea and pou tarāwaho, within resource management processes.
- 3.5 My professional practice sits at the interface between Te Ao Māori and statutory planning frameworks, including the Resource Management Act 1991 and Local Government Act 2002, translating hapū uara, tikanga, mātauranga and kaupapa Māori into planning, resource consent, and management outcomes.
- 3.6 I have worked alongside multiple hapū and iwi across Te Tai Tokerau, including Ngāti Whātua and Te Uri o Hau, providing cultural planning advice, preparing Cultural Impact Assessments, contributing to kaupapa Māori-led landscape and papakāinga design, preparing climate adaptation strategies in partnership with hapū and whanau, and facilitating hapū and community including council engagement processes.
- 3.7 I have provided advice on a wide range of projects for local authorities, Crown agencies, and private sector applicants, including Whangārei District Council, Northland Regional Council, the Department of Conservation,

Waka Kotahi/New Zealand Transport Agency, the Ministry of Education, Kāinga Ora, KiwiRail, Meridian and Northpower.

3.8 My experience includes work on infrastructure and transport projects (including recent projects such as the Marsden Point Rail Link and the Whangārei to Wellsford corridor), wastewater and stormwater infrastructure, multiple papakāinga and housing developments, climate adaptation initiatives, Sites of Significance to Māori and District Plan kaupapa for hapū, and broader coastal and environmental planning initiatives, including strategic policy development.

3.9 Through this work, I have developed expertise in:

- cultural effects assessment from a hapū perspective;
- integration of mātauranga and kaupapa Māori and tikanga into environmental decision-making;
- development of mahi whakaora and Mahere Taiao and Cultural and Environmental Design frameworks;
- hapū-led monitoring and adaptive management strategies; and
- engagement processes between hapū, councils, crown agencies and applicants.

3.10 I have participated in a wide range of resource consent, designation, and Notice of Requirement processes, including involvement in Commissioner hearing processes in my capacity as a landscape architect. My experience is informed by ongoing work in te ao māori, cultural impact assessment kaupapa, hapū engagement, and the integration of mātauranga Māori within environmental and planning frameworks.

3.11 I am a member of NZPI, Papa Pounamu, NZILA and the New Zealand Ecological Society.

3.12 I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses. The matters addressed are within my area of expertise.

4 PROCESS UNDERTAKEN FOR THE CIA

- 4.1 The Cultural Impact Assessment (CIA) was developed over a period of more than two years through a structured, iterative, and hapū-led process, which included multiple hui and ongoing engagement with McCallum Brothers Limited (MBL). This process enabled Te Pouwhenua o Tiakiriri Kūkupa Trust and MBL to maintain dialogue throughout the development of the proposal, including in relation to the progression of technical reporting and cultural assessment matters.
- 4.2 A total of five Te Parawhau Hapū hui were held to consider the proposal and its potential effects.
- 4.3 The first hui also included attendance by a non-hapū member, with subsequent hui focused on hapū whakaaro, kōrero, and assessment of the proposal.
- 4.4 MBL, together with their technical experts, presented the proposal and supporting information at two of the hapū hui (the first and second hui). These hui provided opportunity for Te Parawhau to hear directly from the applicant and for hapū members to ask questions of the applicant and their specialists.
- 4.5 The third and fourth hui were convened as hapū-only hui, enabling Te Parawhau to consider the proposal independently, without the presence of the applicant or external parties.
- 4.6 The third hui confirmed the establishment of a rōpū kaumātua, comprising kaumātua from Te Parawhau Marae and whānau, to provide cultural guidance and oversight in the preparation and review of the CIA.
- 4.7 The fourth hui provided an opportunity for hapū attendees to express their positions on the proposal, including whether they support or oppose the application, and to further discuss key issues and concerns.
- 4.8 At the fifth and final hapū hui, MBL technical experts across relevant disciplines were again made available to attend and respond to questions from hapū and whānau in relation to the proposal.

- 4.9 In addition to the hapū hui, three kaumātua hui were held specifically to review the CIA, providing cultural direction, validation of the information included, and guidance on the development of the mahi whakaora framework.
- 4.10 At the first Te Parawhau Hapū hui held on 26 July 2025, it was advised that Patuharakeke Hapū would undertake their own separate hui process and Cultural Impact Assessment.
- 4.11 The CIA prepared for Te Parawhau Hapū is therefore independent, and reflects Te Parawhau whakapapa, rangatiratanga, me ngā uara ahurea o Te Parawhau.
- 4.12 As part of developing an informed understanding of the proposal, I participated in an overnight haerenga aboard the sand extraction vessel *William Fraser*, travelling from the Port of Auckland to the Pakiri extraction site and returning.
- 4.13 This haerenga enabled direct observation of:
- seabed sand extraction processes;
 - onboard screening and return systems;
 - operational practices, including night-time activity; and
 - vessel systems, navigation, and operational controls.
- 4.14 This experience provided important practical insight into the mechanics and operation of sand extraction activities and assisted in informing my assessment of the proposal and the adequacy of proposed management and monitoring approaches.

Engagement on Specialist Assessments

- 4.15 An additional meeting was convened with Mr Stephen Brown, author of the Landscape and Visual Impact Assessment (LVIA), following concerns raised by Te Parawhau that the assessment did not adequately recognise or reflect Te Parawhau uara ahurea, cultural associations, and understanding of the landscape.

- 4.16 In particular, the LVIA was observed to be heavily informed by engagement with Patuharakeke Hapū, including the adoption of the name “Te Ākau” to describe the project area.
- 4.17 For Te Parawhau Hapū, the area is known as Paepae Atua, a place of significant ancestral importance understood as the seat of the atua, where the business of the natural world and its respective realms were convened and deliberated. This reflects a fundamentally different cultural framing and understanding of place, grounded in Te Parawhau whakapapa and mātauranga.
- 4.18 Prior to engagement with Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) on behalf of Te Parawhau Hapū, this cultural context and naming had not been incorporated into the LVIA. This raised concerns regarding the extent to which the assessment accurately recognised the values and perspectives of all relevant hapū.
- 4.19 These matters were raised with MBL, and a meeting was subsequently held on 12 August 2025 with myself, Matua Pari Walker, and Whaea Mira Norris to discuss these issues directly with Mr Brown.
- 4.20 This engagement provided an opportunity for Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) to outline our cultural understanding of Paepae Atua, and to ensure that our uara ahurea and associations with the taiao and landscape were appropriately recognised and considered within the assessment framework.

5 MATERIAL REVIEWED AND BASIS OF ASSESSMENT

5.1 I reviewed:

- MBL application materials
- relevant technical expert reports
- draft resource consent conditions
- draft and updated management plans

- hapū engagement through hui, and input and direction from kaumātua through the CIA review process
- 5.2 These materials, together with hapū engagement, informed both the CIA and this evidence.
- 5.3 Some materials submitted by MBL since the CIA was prepared have been refined. My assessment reflects the proposal as understood through the information available to the Hapū at the date of the CIA, January 2026 together with subsequent engagement.
- 5.4 This assessment is informed by the CIA, engagement with Te Parawhau Hapū, and my experience in cultural effects assessment and resource management processes.

Recognition of MACA Claims

- 5.5 I note that there are applications for recognition of customary marine title and protected customary rights under the Marine and Coastal Area (Takutai Moana) Act 2011 (MACA) that overlap with the area of Paepae Atua.
- 5.6 These include applications advanced by members of Te Parawhau Hapū, including those associated with Tom Paki and Finnisha Tuhiwai, along with other related applications within the wider rohe. These matters are acknowledged within the CIA and form part of the wider context in which the proposal is being considered.
- 5.7 These matters were discussed with MBL through the CIA process and subsequent engagement. I understand that MBL have indicated a willingness to engage with these processes and, where appropriate, not oppose or prejudice the outcome of those claims.
- 5.8 I also understand that discussions remain ongoing, with the intent that the proposal does not adversely affect those processes.

6 DEVELOPMENT OF MAHI WHAKAORA AND CONDITIONS

- 6.1 As part of the preparation of the CIA, I, alongside Matua Pari Walker, engaged directly with MBL in December 2025 to review and refine the proposed suite of mahi whakaora and draft conditions of consent.
- 6.2 This engagement was undertaken to ensure that the cultural measures identified by Te Parawhau Hapū were not simply conceptual but could be effectively translated into practical and implementable outcomes within the consent framework.
- 6.3 Following completion of the CIA, ongoing review of draft conditions and management plans has continued, with the purpose of ensuring alignment with ngā uara ahurea o Te Parawhau and the pou tarāwaho framework that underpins the CIA.
- 6.4 My assessment reflects the proposal and supporting material available to Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) at the time of preparing this evidence.
- 6.5 I understand that further amendments to the conditions of consent and associated management plans have been lodged by MBL as part of its substantive Fast Track application, following completion of the CIA in January 2026.
- 6.6 A review of the management plans submitted by MBL as part of its substantive Fast Track application was undertaken jointly by myself and Matua Pari Walker, in his capacity as Chair of Te Pouwhenua o Tiakiriri Kūkupa Trust, to assess the extent to which the changes align with the mahi whakaora framework set out in the CIA. Comments were provided to MBL following this review on 22 May 2026, and an addendum to the CIA has since been prepared to record those comments and changes.
- 6.7 Further review of the revised consent conditions has not been undertaken, as those changes were not discussed with Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) prior to lodgement under the Fast Track Approvals Act 2024. Accordingly, this evidence should not be interpreted as

confirmation that Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) has reviewed, approved, or accepts those conditions as final or capable of certification.

- 6.8 The position of Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai), on behalf of Te Parawhau Hapū remains one of conditional support, subject to the mahi whakaora framework being fully and appropriately embedded and given effect within the final conditions of consent and management framework.
- 6.9 For clarity, Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) on behalf of Te Parawhau Hapū, must be actively involved in the development, review, and certification of all management plans required by the consent.
- 6.10 In the event that the Panel does not certify the management plans, and certification is instead undertaken by council(s), the consent conditions must require that:

- Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) is directly involved in any subsequent management plan development, review, and certification processes;
- no management plan is finalised without documented engagement with, and consideration of feedback from, Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) on behalf of Te Parawhau Hapū; and
- the management framework retains clear and enforceable mechanisms (including adaptive management and the ability to amend plans) to ensure the mahi whakaora framework can be fully implemented.

Without these requirements, the mahi whakaora framework may not be fully implemented, and thus, cultural effects may not be adequately addressed.

- 6.11 It is critical that the final conditions of consent and associated management plans fully give effect to the mahi whakaora framework including:

- provision for adaptive management responses;

- clear mechanisms to modify or cease activities where effects on the taiao or mauri are identified; and
- formal notification processes be implemented advising Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) on behalf of the Hapū that a response is required within 20-working days to MBL;
- meaningful and enduring hapū participation in monitoring, decision-making, and implementation.

6.12 These elements are essential to ensure that the proposal is implemented in a manner consistent with Te Parawhau Hapū tiakitanga responsibilities, and that cultural effects are actively managed over time.

7 CULTURAL EFFECTS ASSESSMENT

- 7.1 In my opinion, the proposed sand extraction at Paepae Atua represents an intervention into the living realms of Papatūānuku and Tangaroa, rather than a discrete or isolated physical activity.
- 7.2 From a Te Parawhau perspective, the seabed and associated sand are not inert materials, but are part of an interconnected network of whakapapa relationships, extending across the moana, takutai, and adjoining taiao. These relationships are fundamental to the identity and wellbeing of Te Parawhau as ahi kā and tāngata whenua.
- 7.3 The sand itself is understood as a living element of this whakapapa, imbued with mauri and integral to the balance and functioning of the taiao. Its movement and replenishment reflect the natural rhythms recognised by our tūpuna and support both the wellbeing of the environment and ngā tāngata who remain connected to it.
- 7.4 The extraction of sand from this environment is therefore not a neutral activity. It alters relationships within this whakapapa and has the potential to affect the mauri of Paepae Atua and the wider taiao, including the integrity of connections between land, sea, and people.

- 7.5 While the technical assessments conclude that adverse effects are low or less than minor, those conclusions are derived from western scientific frameworks that focus on biophysical effects.
- 7.6 Those assessments do not fully account for:
- the relational nature of the taiao;
 - the significance of whakapapa relationships between elements of the environment; and
 - the role of mauri as a central indicator of wellbeing.
- 7.7 As a result, a conclusion of “low” or “less than minor” effects in technical terms does not equate to a finding of low cultural effects.
- 7.8 This understanding is consistent with the kōrero of Te Parawhau kaumātua, who emphasise that the sands of Paepae Atua are a living expression of tātai, mauri, and mana, and have long sustained the Hapū through their connection to the moana and surrounding taiao.
- 7.9 From this perspective, disturbance or extraction of sand is not simply a matter of environmental management, but a cultural and spiritual matter, affecting both the integrity of the taiao and the responsibility of Te Parawhau as kaitiaki to uphold balance within it.

Effects on Mauri and Te Taiao

- 7.10 The extraction of sand from Paepae Atua has the potential to affect the mauri of the seabed and the wider taiao, including the relationships that exist between sediment processes, marine species, and broader coastal dynamics.
- 7.11 These relationships are not discrete or isolated. They are interconnected through whakapapa, forming a living network of relationships across the moana, takutai, and adjoining taiao. From a Te Parawhau perspective, changes within one part of this network have the potential to influence the

- wellbeing of the whole, including the relationship between the environment and ngā tāngata who remain connected to it as ahi kā and tāngata whenua.
- 7.12 While technical assessments seek to quantify effects through measurable parameters, the effects on mauri are not always readily captured within these frameworks. Instead, such effects are understood through mātauranga Māori, including knowledge handed down through generations of Te Parawhau tūpuna, and through the lived experience of ahi kā who have long engaged with, relied upon, and observed changes within this ancestral taiao.
- 7.13 This knowledge is not static. It is based on the accumulated intergenerational observations of hapū over time, informed by tohu within the taiao and the ongoing relationship between Te Parawhau and Paepae Atua. It reflects a depth of understanding that extends beyond short-term measurement and captures changes that may occur gradually over generations.
- 7.14 In this context, even where physical effects are assessed as minor, there remains a risk that incremental and cumulative changes to sediment processes, ecological interactions, and coastal dynamics may contribute to the degradation of mauri.
- 7.15 This risk is particularly relevant when considered alongside existing environmental pressures affecting the coastal environment, where the addition of further disturbance may contribute to a gradual erosion of ecological integrity and the mauri of the taiao.
- 7.16 The potential for cumulative effects on mauri requires careful consideration, as such changes may not be immediately apparent, but may become evident over time through shifts in environmental indicators, tohu within the taiao, and the ongoing observations and knowledge of ngā tāngata whenua.
- 7.17 Accordingly, the assessment of effects on mauri cannot be limited to short-term or site-specific measures. It must be understood within the context of longer-term change, intergenerational knowledge, and the enduring

responsibility of Te Parawhau to uphold the balance and wellbeing of the taiao.

Effects on Tiakitanga and Rangatiratanga

- 7.18 Te Parawhau Hapū hold responsibilities of tiakitanga in relation to Paepae Atua and the surrounding taiao. These responsibilities are grounded in whakapapa, ahi kā, and the enduring relationship of Te Parawhau as tāngata whenua of this wider ancestral taiao.
- 7.19 Tiakitanga in this context is not an abstract concept. It is an active and intergenerational obligation to uphold and protect the mauri of the taiao, and to maintain balance within the relationships that exist between Papatūānuku, Tangaroa, ngā atua, and ngā tāngata.
- 7.20 A key cultural effect of the proposal is not limited to the physical extraction of sand but extends to the way in which that activity affects the ability of Te Parawhau Hapū to exercise tiakitanga in a meaningful and effective manner.
- 7.21 This is intrinsically linked to rangatiratanga, which for Te Parawhau includes the authority to define, express, and uphold our relationship with Paepae Atua according to our own tikanga, mātauranga, and uara ahurea.
- 7.22 This rangatiratanga is reflected in Te Parawhau hītori and kōrero tuku iho associated with Paepae Atua, which is understood not as a discrete location, but as an extensive ancestral taiao extending across the moana and adjoining whenua, including connections south to Te Pae o Tū and across to Taranga and beyond.
- 7.23 Within this wider domain, Paepae Atua is recognised as the seat of ngā atua, where Tāne, Tūmataurangi, Tangaroa and others convene to deliberate the balance of their respective realms. These understandings are grounded in whakapapa, mātauranga, and the lived relationship of Te Parawhau as ahi kā and tāngata whenua and continue to be upheld through intergenerational knowledge and ongoing engagement with the taiao.

- 7.24 The naming of this area as Paepae Atua reflects this enduring relationship and understanding, and affirms the mana, identity, and authority of Te Parawhau Hapū in relation to this ancestral taiao, as held through whakapapa and unimpeded access and ongoing connection to the taiao.
- 7.25 Where monitoring, management, and decision-making processes sit solely with the Consent Holder or regulatory authorities, without meaningful and enduring involvement of Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) on behalf of Te Parawhau Hapū, this has the potential to undermine rangatiratanga and limit the ability of Te Parawhau to fulfil our tiakitanga obligations.
- 7.26 In such circumstances, Te Parawhau Hapū risk being positioned as passive observers, rather than active participants in the ongoing care and protection of the taiao. This is not consistent with the exercise of tiakitanga as understood by Te Parawhau Hapū.
- 7.27 To give effect to Te Parawhau Hapū rangatiratanga, it is essential that Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) on behalf of Te Parawhau Hapū are actively involved in monitoring, interpretation of environmental change, and decision-making processes, including the ability to influence or direct responses where adverse effects on the taiao are identified.
- 7.28 This includes ensuring that mātauranga Māori, intergenerational knowledge, and the lived relationship of Te Parawhau Hapū with the taiao are recognised as central to the assessment of effects and the ongoing management of the proposal.
- 7.29 Without these provisions, the proposal would not adequately recognise or provide for Te Parawhau Hapū tiakitanga responsibilities or rangatiratanga, and the cultural effects would remain significant.

Effects on Tikanga and Rāhui

- 7.30 The exercise of tiakitanga by Te Parawhau Hapū includes the application of tikanga-based responses to events within the taiao or matters of

significance to the Hapū, including the imposition of rāhui where appropriate.

- 7.31 Rāhui are an established tikanga mechanism used to protect the mauri of the taiao, uphold the wellbeing of ngā tāngata, and respond to events of significance within this ancestral domain. Within the context of Paepae Atua, this includes events such as whale strandings (tōhorā), which are known to occur within this area, or loss of life within the moana, where rāhui may be imposed to recognise and protect the affected taiao.
- 7.32 MBL have acknowledged and agreed to the need to pause extraction activities where a rāhui is imposed, which reflects an understanding of tikanga and the role of Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) on behalf of Te Parawhau Hapū in responding to such events.
- 7.33 However, it is essential that this recognition is formally embedded within consent conditions and management frameworks, to ensure that the exercise of tikanga, including the imposition of rāhui, can be effectively recognised and implemented in practice.
- 7.34 The ability of Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) on behalf of Te Parawhau Hapū to apply tikanga responses, including rāhui, is a fundamental component of tiakitanga and rangatiratanga, and must be provided for in a manner that enables timely and meaningful response to events affecting the mauri of Paepae Atua and the wider taiao.

Limitations of Technical Assessments

- 7.35 The technical assessments prepared in support of the application appropriately assess a range of environmental effects using recognised scientific methodologies and indicators.
- 7.36 Based on my experience in cultural effects assessments and in the findings of the CIA, these assessments are inherently limited in their ability to fully capture the cultural dimensions of the receiving environment, particularly from a Te Parawhau Hapū perspective.

7.37 In particular, the technical assessment does not fully account for:

- the relational nature of the taiao, including the interconnectedness of environmental elements through whakapapa;
- the significance of mātauranga Māori and kaupapa Māori understandings of environmental health and change;
- the cultural and spiritual dimensions of the environment, including the role of mauri; and
- the intergenerational obligations held by hapū, including responsibilities of tiakitanga passed down through ngā tūpuna.

7.38 These matters are not readily measurable through standard scientific frameworks, and may therefore be underrepresented or absent, despite being fundamental to Te Parawhau Hapū understanding of environmental wellbeing.

7.39 Accordingly, a conclusion that effects are “low” or “less than minor” in technical terms does not equate to a finding of low cultural effects, particularly where those effects relate to mauri, whakapapa relationships, and the ability of Te Parawhau Hapū to exercise tiakitanga.

7.40 It is therefore necessary that technical findings are considered alongside mātauranga Māori, hapū knowledge, and cultural assessment frameworks, to ensure that the full extent of effects on the taiao is appropriately understood.

Role of Monitoring and Adaptive Management

7.41 In my experience and the outcomes identified through the CIA, while monitoring is an important component of the proposal, it alone is not sufficient to address cultural effects, particularly those relating to mauri, whakapapa relationships, and the ability of Te Parawhau Hapū to exercise tiakitanga.

7.42 From a Te Parawhau Hapū perspective, monitoring must do more than record changes occurring within the taiao. It must provide a mechanism

through which mātauranga Māori, tikanga, and hapū knowledge are actively applied, allowing for a deeper understanding of the condition and wellbeing of Paepae Atua and the wider taiao over time, and ensuring that monitoring outcomes directly inform adaptive management responses and decision-making.

7.43 For monitoring to be meaningful, it must:

- incorporate mātauranga Māori, including the use of tohu and knowledge informed by maramataka;
- involve Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) on behalf of Te Parawhau Hapū in the design, implementation, and interpretation of monitoring programmes; and
- be directly linked to clear and responsive adaptive management mechanisms.

7.44 Adaptive management is critical in this context. It provides the means to respond to actual and emerging effects on the taiao and is essential to give practical effect to tiakitanga. Without adaptive management, monitoring cannot respond to harm — it can only record it.

7.45 This includes the ability to:

- modify, reduce, or cease extraction activities where adverse effects on the taiao are identified; and
- ensure that any increase in the scale or intensity of extraction is only undertaken following demonstrated performance in relation to the taiao and appropriate review of monitoring outcomes.

7.46 The availability of adaptive management measures is fundamental to providing confidence to Te Parawhau Hapū that appropriate responses can be applied where harm to the taiao or degradation of mauri is observed. Without such mechanisms, the ability of hapū to uphold their tiakitanga obligations is constrained.

- 7.47 Monitoring that is not linked to clear and enforceable responses risks becoming a passive exercise, where changes are recorded but not acted upon. Such an approach does not uphold the mauri of Paepae Atua, nor does it reflect the responsibilities of Te Parawhau Hapū as ahi kā and tāngata whenua.
- 7.48 Monitoring should also provide for the intergenerational transmission of mātauranga, including the involvement of taitamariki alongside kaumātua and hapū. This reflects the continuation of knowledge, practice, and responsibility inherent within tiakitanga, and ensures that the relationship of Te Parawhau Hapū with Paepae Atua is maintained and upheld across generations.
- 7.49 In this context, monitoring and adaptive management must function together as an active expression of tiakitanga, grounded in mātauranga Māori and responsive to the lived relationship of Te Parawhau Hapū with Paepae Atua and the wider taiao.

Overall Assessment

- 7.50 Taking the matters outlined above into account, I consider that the proposal has the potential to result in adverse effects on the mauri of Paepae Atua, the wider taiao, and ngā uara ahurea o Te Parawhau Hapū.
- 7.51 These effects arise not only from the physical removal of sand, but from the potential disruption of whakapapa relationships, the integrity of the taiao, and the ability of Te Parawhau to exercise tiakitanga and rangatiratanga in a meaningful and effective way.
- 7.52 While technical assessments conclude that effects are low or less than minor, those conclusions do not fully reflect the cultural dimensions of effect, particularly in relation to mauri, intergenerational obligation, and the enduring relationship of Te Parawhau Hapū as ahi kā and tāngata whenua.
- 7.53 In my assessment, these effects can only be appropriately addressed where a comprehensive and enforceable suite of mahi whakaora is in place, including:

- hapū-led monitoring grounded in mātauranga Māori;
- clear adaptive management mechanisms that enable timely response to adverse effects on the taiao; and
- meaningful and enduring involvement of Te Parawhau Hapū in decision-making and implementation.

7.54 The ability to modify, reduce, or cease extraction activities, and to respond appropriately through tikanga such as rāhui, is essential to ensuring that the mauri of Paepae Atua and the wider taiao is upheld.

7.55 It is on this basis that Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai), on behalf of Te Parawhau Hapū, has reached a position of conditional support. This support is contingent on mahi whakaora being fully embedded within consent conditions and management frameworks in a manner that gives effect to Te Parawhau Hapū tiakitanga obligations and rangatiratanga.

7.56 Without these provisions, the adverse cultural effects of the proposal cannot be appropriately managed through the proposed monitoring and management approach.

7.57 In the absence of these measures, the proposal would not adequately recognise and provide for the relationship of Te Parawhau Hapū with Paepae Atua, nor enable the exercise of tiakitanga and rangatiratanga. In that context, cultural effects would remain significant.

8 MAHI WHAKAORA FRAMEWORK

8.1 The mahi whakaora framework developed through the CIA provides an approach to addressing the effects of the proposal that is grounded in ngā uara ahurea o Te Parawhau Hapū, and informed by mātauranga Māori, tiakitanga obligations, and the lived relationship of Te Parawhau with Paepae Atua. Mahi whakaora is determined by Te Parawhau Hapū in accordance with tikanga.

- 8.2 This framework recognises that effects on the taiao and mauri are not always static or fully predictable, and therefore requires an approach that is responsive, adaptive, and informed by ongoing engagement with the taiao.
- 8.3 Tikanga forms an important part of this framework, including the application of tikanga responses such as rāhui where appropriate, alongside:
- hapū-led monitoring, incorporating mātauranga Māori, tohu, and maramataka;
 - adaptive management, enabling modification or cessation of activities where adverse effects on the taiao are identified; and
 - meaningful and enduring participation of Te Parawhau Hapū in decision-making, implementation, and oversight.
- 8.4 The framework also provides for the intergenerational transmission of mātauranga, ensuring that knowledge, practice, and responsibility are upheld across generations, consistent with Te Parawhau Hapū obligations as ahi kā and tāngata whenua.
- 8.5 In my assessment, the mahi whakaora framework is central to ensuring that the proposal can be implemented in a manner that recognises and gives effect to Te Parawhau Hapū rangatiratanga, tiakitanga, and ngā uara ahurea.

9 REVIEW OF CONDITIONS AND MANAGEMENT FRAMEWORKS

- 9.1 For the mahi whakaora framework to be effective, it must be fully embedded and enforceable within consent conditions and associated management plans, rather than relying on voluntary or discretionary measures. This includes the involvement of Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) on behalf of Te Parawhau Hapū not only in monitoring and interpretation, but also in decision-making in relation to adaptive management responses and implementation of mahi whakaora.

9.2 Conditions must:

- provide for the active and ongoing involvement of Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) on behalf of Te Parawhau Hapū in monitoring, interpretation of results, and decision-making processes;
- include clear and enforceable adaptive management mechanisms, including the ability to modify, reduce, or cease extraction activities where adverse effects on the taiao are identified;
- recognise and provide for the application of tikanga responses, including rāhui, and require corresponding operational responses; and
- ensure that any increase in extraction scale or intensity is subject to demonstrated performance in relation to the taiao and appropriate review, including input from Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) on behalf of Te Parawhau Hapū.

9.3 Without these provisions the monitoring and management regime will not provide a timely or effective response to changes in the taiao or degradation of mauri.

9.4 It is therefore critical that consent conditions are clear, enforceable, and capable of being implemented in practice, and that they give full effect to the intent of the mahi whakaora framework.

10 CONCLUSIONS

10.1 The proposed sand extraction at Paepae Atua represents an intervention into a living ancestral taiao, with the potential to affect the mauri of the seabed, the integrity of whakapapa relationships, and the ability of Te Parawhau Hapū to exercise tiakitanga.

10.2 While technical assessments conclude that effects are low or less than minor, they do not fully capture the cultural dimensions of effect, including

those relating to mauri, intergenerational obligation, and the relationship of Te Parawhau Hapū as ahi kā and tāngata whenua.

- 10.3 Monitoring alone is not sufficient to address these effects. Monitoring must be supported by adaptive management, grounded in mātauranga Māori and informed by tikanga, and must enable timely and meaningful responses to changes within the taiao.
- 10.4 The ability of Te Parawhau Hapū to apply tikanga-based responses, including rāhui, and to participate actively in monitoring and decision-making, is fundamental to the exercise of tiakitanga and rangatiratanga.
- 10.5 These matters are addressed through the mahi whakaora framework, which provides a comprehensive approach to avoiding, remedying, and responding to adverse effects, grounded in ngā uara ahurea o Te Parawhau Hapū.
- 10.6 In my assessment, the proposal has the potential to result in adverse effects on the taiao and ngā uara ahurea o Te Parawhau Hapū, and these effects can only be appropriately addressed where the mahi whakaora framework is fully implemented and enforceable.

11 RECOMMENDATIONS

- 11.1 Based on my assessment, I recommend that the decision-makers:
 - a. Require the full implementation of the mahi whakaora framework, as set out in the CIA, including hapū-led monitoring undertaken by Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai), adaptive management, and tikanga-based responses;
 - b. Ensure that consent conditions provide for the meaningful and enduring involvement of Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) on behalf of Te Parawhau Hapū in monitoring, interpretation of results, and decision-making processes;

- c. Include clear and enforceable adaptive management provisions, including the ability to modify, reduce, or cease extraction activities where adverse effects on the taiao are identified;
- d. Recognise and provide for the application of tikanga, including rāhui, and require the cessation of activities where such responses are applied;
- e. Require that any increase in extraction scale or intensity is subject to demonstrated performance in relation to the taiao and appropriate review, including input from Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) on behalf of Te Parawhau Hapū; and
- f. Ensure that conditions and management frameworks are implemented in a manner that gives effect to Te Parawhau Hapū tiakitanga obligations, rangatiratanga, and ngā uara ahurea.

11.2 Provided that these recommendations are adopted and implemented, Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai), on behalf of Te Parawhau Hapū, have reached a position of conditional support for the proposal.

11.3 Without these measures, I consider that the cultural effects of the proposal would not be appropriately addressed and would remain significant.