

Responses to Comments from Administering and Local Authorities

Comment Number	Comment	Applicant Technical Input	Where it is Addressed in the Application Documents	Response
1. Endangered Species Foundation – Tāngaro Tuia te Ora				
ESF-01	Overall opposition to the proposal and request that consent be declined. ESF opposes the application in full and submits that the proposal presents unacceptable risks to biodiversity, fisheries, coastal communities and the marine environment. ESF considers that the environmental costs outweigh any claimed economic benefits and requests that the application be declined.	Planning Team; Relevant Technical Experts	AEE – Project Need, Alternatives and Overall Assessment of Effects. Assessment of Economic Effects (Attachment 18) – Demand Outlook and Supply Assessment (Sections 3–4).	The application includes a detailed assessment of future demand for suitable concrete-grade sand and identifies a growing long-term supply deficit in the Auckland and upper North Island market. Attachment Eighteen concludes that existing consented marine sand sources are insufficient to meet projected future demand and that constraints exist on alternative sources. Attachment Twenty confirms that Bream Bay sand possesses characteristics particularly suited to high-strength concrete production. MBL’s position is that all assessed environmental effects are all a ‘low-negligible’ level and can be sufficiently managed and monitored whilst providing an important strategic source of construction material required to support housing, infrastructure and economic development over coming decades.
ESF-02	There is no sand shortage and no economic justification for seabed extraction. ESF submits that alternative sand supplies already exceed Auckland demand and relies on external economic critiques which allege that MBL's economic case is flawed, that transport and emissions assumptions are unreliable and that economic benefits are overstated.	M.E. Consulting – Lawrence McIlrath; Paul Donoghue	Assessment of Economic Effects (Attachment 18) – Demand Outlook and Supply Assessment (Sections 3–4). Concrete Suitability Statement (Attachment 20) – Alternative Sand Sources and Concrete Suitability. L.McIlrath's statement of evidence dated 12 August 2026.	Alternative sand sources, including manufactured sand, terrestrial quarries and existing marine sand operations, were considered within the Economic Effects Assessment and Concrete Suitability Statement. The application concludes that while alternative sources contribute to supply, they do not eliminate the forecast long-term supply shortfall. MBL's evidence also notes that not all alternative materials are suitable substitutes for marine sand across all concrete applications and that a diversified supply portfolio is required to meet future demand.
ESF-03	Tara iti (New Zealand Fairy Tern) may be adversely affected. ESF submits that the proposal threatens feeding and roosting habitat relied upon by tara iti and argues that sediment plumes, habitat disturbance and changes to prey availability may adversely affect one of the world's rarest seabirds. ESF notes known nesting activity at Waipū Cove.	NIWA – David Thompson; SLR Consulting NZ	Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects (Sections 4–5). D.Thompson's statement of evidence dated 12 August 2026.	The potential effects on tara iti, seabirds and shorebirds were specifically assessed by NIWA through targeted surveys, literature review and assessment of ecological pathways. The assessment considered prey availability, vessel activity, habitat use and indirect effects arising from sediment plumes. NIWA concluded that the proposal is unlikely to result in population-level effects on tara iti or other protected seabird species. Proposed Wildlife Approval Conditions and monitoring requirements provide additional safeguards for protected fauna. Mr Thompson’s statement of evidence addresses the Endangered Species Foundation’s comments on impacts to coastal breeding and roosting habitats in theme 1 (Paragraphs 8-12) and effects on sediments on seabird prey availability and abundance in theme 2 (Paragraphs 13-15).
ESF-04	Potential adverse effects on scallop beds, fisheries and marine biodiversity. ESF submits that the extraction area overlaps a recovering scallop habitat and may adversely affect scallops, snapper fisheries, marine biodiversity and wider ecosystem functioning. ESF also raises concerns regarding sediment plumes and ecological recovery.	R.O. Boyd; Bioresearches Group	Assessment of Fish and Fisheries Effects (Attachment 16) – Potential Sand Dredging Effects and Conclusions (Sections 5–7). Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8).S.West's statement of evidence dated 12 August 2026. R.O. Boyd's statement of evidence dated 12 August 2026. E.Jones statement of evidence dated 12 August 2026. R.Reinen-Hamill and E.Beetham’s joint statement of evidence dated 12 August 2026.	The application includes dedicated assessments of benthic ecology, fisheries resources, water quality and marine biodiversity. These investigations evaluated potential effects on scallop habitat, benthic communities, fish populations and ecological functioning. The assessments conclude that effects will be localised to the extraction footprint, that recovery is expected to occur over time, and that significant adverse population-level effects on fisheries resources are unlikely. Extensive monitoring and adaptive management measures are proposed through the Environmental Monitoring Management Plan. MBL defer to Mr West’s response to RFI 1 in his paragraphs 51-60 whereby reference to monitoring at Pakiri. MBL defer to Mr Boyd’s statement of evidence in relation to snapper fisheries, recreational fishing opportunities, and Mrs Jone’s statement of evidence in relation to water quality, and Mr Reinen-Hamill and Mr Beetham’s joint statement of evidence in relation to Coastal Processes.
ESF-05	Coastal erosion and beach stability concerns. ESF submits that removal of offshore sediment may adversely affect beach stability, sediment budgets and shoreline resilience, and relies on concerns previously raised regarding Mangawhai-Pakiri and broader coastal erosion processes.	Tonkin + Taylor Ltd	Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects and Conclusions (Sections 5–7). R.Reinen-Hamill and E.Beetham’s joint statement of evidence dated 12 August 2026.	Coastal process investigations undertaken by Tonkin + Taylor included bathymetric surveys, sediment sampling, seabed characterisation and numerical modelling. The assessment concluded that the extraction area is located beyond the depth of closure and outside the active nearshore sediment transport system. Accordingly, the proposal is not expected to materially affect beaches, dunes, shoreline stability or surf breaks within Bream Bay. These conclusions are reinforced through proposed monitoring and adaptive management provisions. MBL defer to Mr Reinen-Hamill and Mr Beetham’s joint statement of evidence in relation to Coastal Processes.
ESF-06	The Fast-track process is inappropriate for a proposal of this scale. ESF submits that the Fast-track process limits public participation, constrains expert scrutiny and is unsuited to assessing a project involving long-term extraction of a non-renewable marine resource.	Planning Team; Legal Team	AEE – Consultation and Engagement; Statutory Assessment. Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Cultural Effects Assessment and Recommendations.	The application is supported by a comprehensive suite of technical assessments, management plans and proposed consent conditions specific to the Bream Bay proposal. The current application must be assessed on its own merits, including the environmental effects identified for the proposed extraction area, the proposed monitoring framework and the enforceable conditions offered by MBL. The proposed consent framework includes extensive monitoring, reporting, review and adaptive management provisions designed to ensure compliance and environmental performance throughout the life of the project.
ESF-07	MBL's compliance history and Pākiri operations raise concerns regarding future compliance. ESF refers to historic issues associated with the Mangawhai-Pākiri operation, including trench formation, monitoring concerns and alleged environmental harm. ESF submits that these matters should reduce confidence in MBL's ability to manage effects at Te Ākau Bream Bay.	Planning Team; NIWA	Environmental Monitoring Management Plan (Attachment 29) – Adaptive Management, Monitoring and Reporting Framework. Recommended Resource Consent Conditions (Attachment 26) – Monitoring, Review and Compliance Conditions. S.Elstob's statement of evidence dated 12 August 2026	The Fast-track Approvals Act establishes the statutory process under which the application is being assessed. The application has been subject to review by the Expert Panel, invited comments from statutory parties, multiple requests for further information, public release of technical material and detailed consideration of environmental, cultural, economic and social effects. The appropriateness of the statutory process itself is ultimately a matter for Panel rather than the substantive merits assessment of the proposal. MBL defers to Mr Elstob’s statement of evidence.
ESF-08	Public opposition and lack of social licence. ESF relies on a petition containing approximately 14,000 signatures, public demonstrations and community opposition as evidence that the proposal lacks public support and social licence. ESF submits that these matters should be given significant weight by the Panel.	Planning Team	AEE – Consultation and Engagement. Recommended Resource Consent Conditions (Attachment 26) – Pre-start Hui, Community Contribution and Cultural Contribution Conditions.	The application acknowledges that community views regarding the proposal differ. Public submissions, petitions and expressions of support or opposition form part of the broader context within which the application is assessed. The Expert Panel's role is to evaluate the proposal against the statutory criteria of the Fast-track Approvals Act, having regard to the technical evidence, environmental effects, proposed mitigation measures and the benefits of the project.
2. Minister for Treaty of Waitangi Negotiations				
No Comment.				
3. Te Waihanga (New Zealand Infrastructure Commission)				

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TW-01	Importance of aggregate resources for infrastructure delivery. Te Waihanga notes the importance of understanding, planning and utilising aggregate resources to ensure infrastructure providers have a reliable and affordable supply of aggregates and notes that infrastructure development requires large quantities of aggregate materials. Te Waihanga refers to its Aggregate Opportunities Modelling work and broader infrastructure planning functions.	M.E. Consulting – Lawrence McIlrath; Paul Donoghue	Assessment of Economic Effects (Attachment 18) – Demand Outlook and Supply Assessment (Sections 3–4). Concrete Suitability Statement (Attachment 20) – Concrete Sand Suitability and Alternative Sources. L.McIlrath's statement of evidence dated 12 August 2026	Te Waihanga's comments are generally consistent with the application's assessment of the importance of aggregate resources to support infrastructure delivery. Attachment 18 identifies future aggregate and concrete sand supply constraints and assesses the role the proposal may play in supporting long-term infrastructure and construction demand. MBL defer to Mr McIlrath’s statement of evidence.
TW-02	No specific position on the application. Te Waihanga advises that it is not making a specific comment on the application and notes that the Bream Bay Sand Extraction Project has not been submitted to either the Infrastructure Priorities Programme (IPP) or the National Infrastructure Pipeline.	Planning Team	AEE – Project Purpose, Need and Benefits. Assessment of Economic Effects (Attachment 18) – Strategic Infrastructure Context and Economic Benefits.	Te Waihanga neither supports nor opposes the proposal. Its comments provide contextual information regarding infrastructure planning and aggregate resource management but do not constitute an assessment of the environmental effects or merits of the application itself.
4. Takahiwai Māori Committee				
TMC-01	Protection of Te Ākau/Bream Bay and the obligation of Tiakitai (safeguarding the coast). TMC submits that its primary concern is safeguarding the coast and protecting the relationship between tangata whenua and the marine environment. It expresses concern regarding the long-term consequences of removing sand from the seabed and the potential loss of place, environmental values and cultural connections.	Cultural Advisors; Planning Team	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Cultural Effects Assessment and Recommendations. AEE – Consultation and Engagement with Tangata Whenua. C.McCallum's statement of evidence dated 12 August 2026.	The application recognises the longstanding cultural relationship of tangata whenua with Te Ākau/Bream Bay through extensive engagement, multiple Cultural Impact Assessments and incorporation of tangata whenua recommendations into project design, management plans and proposed consent conditions. Cultural values, mana moana, kaitiakitanga responsibilities and customary relationships with the marine environment have been specifically assessed and form an important component of the overall environmental and cultural assessment framework.
TMC-02	Potential adverse effects on marine species, birds and ecosystem resilience. TMC submits that disturbance of the seabed may adversely affect marine species, bird communities and ecosystem resilience. It relies on broader ecological literature regarding loss of ecological redundancy, biodiversity decline and the importance of maintaining ecosystem function in the face of environmental change.	Bioresearches Group; NIWA; SLR Consulting NZ	Assessment of Fish and Fisheries Effects (Attachment 16) – Potential Sand Dredging Effects and Conclusions (Sections 5–7). D.Thompson's statement of evidence dated 12 August 2026. S.West's statement of evidence dated 12 August 2026.. R.O. Boyd's statement of evidence dated 12 August 2026. H.McConnell's statement of evidence dated 12 June 2026 E.Jones statement of evidence dated 12 August 2026. R.Reinen-Hamill and E.Beetham’s joint statement of evidence dated 12 August 2026.	Potential effects on the mauri of the receiving environment were considered through both cultural and scientific assessments. The application includes detailed investigations of benthic ecology, fisheries resources, marine mammals, seabirds, water quality and coastal processes, which collectively conclude that environmental effects can be appropriately avoided, remedied or mitigated. Monitoring, adaptive management and tangata whenua participation provide additional safeguards to maintain the health and integrity of the marine environment throughout the life of the project. Notwithstanding this, MBL defer to Mr Thompson’s evidence in relation to shorebirds and seabirds, Mr West’s evidence in relation to benthic ecology, Mr Boyd’s evidence in relation to fisheries, Mrs McConnell’s evidence in relation to marine mammals, Mrs Jone’s evidence in relation to water quality, and Mr Reinen-Hamill and Mr Beetham’s joint statement of evidence in relation to Coastal Processes.
TMC-03	Climate change, sustainability and alternatives to concrete sand extraction. TMC submits that alternative materials and technologies are emerging which may reduce dependence on marine sand extraction, including manufactured sand, quarry waste products, recycled materials and lower-carbon concrete technologies. TMC argues that alternatives should be prioritised over seabed extraction.	M.E. Consulting; Paul Donoghue	Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8). Assessment of Fish and Fisheries Effects (Attachment 16) – Potential Sand Dredging Effects and Conclusions (Sections 5–7). P.Donoghue's statement of evidence dated 12 August 2026. T.Walters statement of evidence dated 12 August 2026.	The application recognises the role of tangata whenua as kaitiaki of Te Ākau/Bream Bay and incorporates cultural values into the proposed environmental management framework. The project has been developed alongside tangata whenua engagement processes and includes opportunities for ongoing participation in environmental monitoring, review of management plans and adaptive management responses. This approach supports the exercise of kaitiakitanga alongside scientific monitoring and environmental management. MBL defer to Mr Donoghue’s evidence in relation to marine sand alternatives and manufactured sand, and Mr Walters’s evidence in relation to manufactured sand.
TMC-04	Economic benefits should extend more broadly to Māori communities. TMC submits that any economic benefits arising from the proposal should contribute more directly to improving Māori wellbeing, including health, education, housing, employment and environmental restoration initiatives. TMC proposes the establishment of a substantial Māori wellbeing and environmental trust.	Planning Team; M.E. Consulting	Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects and Conclusions (Sections 5–7). C.McCallum's statement of evidence dated 12 August 2026	Specialist fisheries, benthic ecology and water quality assessments evaluated potential effects on kaimoana species, fisheries habitats and marine food web dynamics. These assessments conclude that effects will be localised to the extraction footprint, that significant adverse population-level effects on fisheries resources are unlikely, and that habitat recovery is expected to occur over time. The proposed monitoring programme provides an ongoing mechanism to verify environmental performance and resource condition. MBL defer to Mr McCallum’s evidence in relation to the Projects contribution to improving Māori wellbeing, including health, education, housing, employment and environmental restoration initiatives.
TMC-05	Potential cumulative effects arising from industrialisation of the coast. TMC refers to cumulative environmental change associated with Northport, Channel Infrastructure, energy infrastructure, housing development and other coastal modification. TMC is concerned that the proposal contributes to a broader pattern of environmental degradation and loss of cultural connection to Te Ākau.	Planning Team; Relevant Technical Experts	Assessment of Coastal Processes Effects (Attachment 8). Assessment of Water Quality Effects (Attachment 9). Assessment of Underwater Noise Effects (Attachment 11). Assessment of Benthic Ecology Effects (Attachment 12). Assessment of Marine Mammal Effects (Attachment 14) – Environmental Impact Assessment and Conclusions (Sections 4–6). Assessment of Scleractinian Cup Corals Effects (Attachment 21). Marine Mammal Management Plan (Attachment 28) Environmental Monitoring Management Plan (Attachment 29). Cup Coral Management Plan (Attachment 30). R.Reinen-Hamill and E.Beetham's joint statement of evidence dated 12 August 2026.	Dedicated assessments of coastal processes, water quality, benthic ecology, marine mammals, underwater noise, seabirds and protected species of cup corals were undertaken by recognised subject matter experts. These investigations considered habitat use, behavioural responses, underwater noise, vessel interactions, prey availability and cumulative effects. The assessments conclude that significant adverse population-level effects are unlikely and are supported by management plans, monitoring requirements and proposed wildlife approval conditions. MBL defer to Mr Reinen-Hamill and Mr Beetham’s joint statement of evidence in relation to Coastal Processes.
TMC-06	Alternative aggregate sources and manufactured sand should be further investigated. TMC refers to Kayasand technology, recycled materials and external research suggesting that alternative sources may be capable of supplying future aggregate demand without requiring marine sand extraction.	M.E. Consulting; Paul Donoghue	Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects (Sections 4–5). T.Walters statement of evidence dated 12 August 2026.	The proposed consent framework provides for continued tangata whenua involvement through implementation of management plans, review of monitoring information, environmental reporting processes and adaptive management mechanisms. MBL considers that ongoing engagement and participation will assist in integrating mātauranga Māori with scientific monitoring and support effective environmental stewardship throughout the operational life of the project. MBL defer to Mr Walters’s evidence in relation to investigating manufactured sand.

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TMC-07	Precautionary approach and protection of future ecological discoveries. TMC submits that significant ecological discoveries may occur within the extraction area over the life of the consent and questions how extraction activities would respond if previously unknown ecosystems, species or ecological processes are discovered. TMC advocates a precautionary approach to environmental management.	NIWA; Bioresearches Group; Planning Team	Environmental Monitoring Management Plan (Attachment 29). Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Cultural Values, Kaitiakitanga and Recommendations. Recommended Resource Consent Conditions (Attachment 26) – Cultural Participation and Engagement Conditions.	The Environmental Monitoring Management Plan establishes a comprehensive monitoring programme covering benthic ecology, fisheries, bathymetry, water quality, marine mammals, underwater noise and other environmental indicators. Monitoring is supported by reporting obligations, review mechanisms and adaptive management provisions designed to identify unexpected effects at an early stage and implement appropriate management responses where necessary. There are a number of opportunities for tangata whenua input provided for in Environmental Monitoring Management Plan (Attachment 29) and Recommended Resource Consent Conditions (Attachment 26) respectively. Notwithstanding this, Condition 20 provides for adaptive triggers if immobile layers (e.g. rock) or historic facies, sensitive or protective species are found, an Accidental Discovery Protocol and is provided for in Condition 46 and a Desktop Maritime Archaeological and Heritage Assessment in Condition 20A of Recommended Resource Consent Conditions (Attachment 26).
TMC-08	Long-term stewardship, intergenerational wellbeing and environmental responsibility. TMC emphasises the importance of protecting Te Ākau for future generations and ensuring that environmental decisions support long-term cultural, ecological and community wellbeing rather than short-term economic outcomes.	Planning Team; Cultural Advisors; Relevant Technical Experts	Environmental Monitoring Management Plan (Attachment 29) – Adaptive Management, Monitoring and Reporting Framework. Recommended Resource Consent Conditions (Attachment 26) – Monitoring, Review and Compliance Conditions. C.McCallum's statement of evidence dated 12 August 2026	The application concludes that the proposal can provide a secure long-term source of construction sand required to support housing, infrastructure and economic development across the upper North Island while appropriately managing environmental and cultural effects. The proposed management framework, monitoring programme, wildlife approval conditions and consent conditions collectively provide a robust and precautionary approach to environmental management throughout the life of the project. MBL defer to Mr McCallum’s evidence in relation to the Projects contribution to improving long term Māori wellbeing, including health, education, housing, employment and environmental restoration initiatives.
5. Minister for Economic Growth				
MEG-01	The proposal has the potential to deliver significant regional and national economic benefits. The Minister concludes that, based on the information provided by MBL, the project may be assessed as having the potential to deliver significant regional and national economic benefits under section 22(2)(a)(iv) of the Fast-track Approvals Act.	M.E. Consulting – Lawrence McIlrath; Planning Team	Assessment of Economic Effects (Attachment 18) – Infrastructure Investment Outlook and Demand Outlook (Sections 3–4). AEE – Project Need and Benefits Assessment.	The Minister's comments support the conclusions of the Economic Effects Assessment that the proposal has the potential to provide significant regional and national economic benefits through improved supply resilience, avoided transport costs and support for infrastructure development.
MEG-02	The proposal provides economic benefits through avoided costs, increased competition and supply resilience. The Minister notes that MBL's economic assessment identifies approximately \$383.1 million in avoided costs over the life of the project, including avoided transport costs, environmental costs and social costs. The Minister also notes potential benefits associated with improved competition, market efficiency, wider sand supply choices and reduced supply chain constraints.	M.E. Consulting – Lawrence McIlrath	Assessment of Economic Effects (Attachment 18) – Supply Assessment and Economic Benefits. Concrete Suitability Statement (Attachment 20) – Concrete Sand Suitability and Alternative Sources.	The Minister's comments are generally consistent with MBL’s economic evidence, which identifies benefits arising from reduced transport requirements, increased market competition, improved supply resilience and support for future infrastructure and construction demand.
MEG-03	The proposal supports the efficient supply of a key construction input for Auckland and the upper North Island. The Minister notes that the project would provide a long-term source of concrete-grade sand for the Auckland construction and infrastructure market and reduce reliance on a limited number of existing suppliers.	M.E. Consulting – Lawrence McIlrath; Paul Donoghue	Assessment of Economic Effects (Attachment 18) – Regional and National Economic Benefits. AEE – Overall Benefits Assessment. P.Donoghue's statement of evidence dated 12 August 2026	The application identifies increasing demand for suitable concrete sand and the strategic importance of maintaining reliable supply options for infrastructure, construction and growth across Auckland and the upper North Island. The Minister's comments support the economic rationale presented in the application.
6. Ocean Beach Residents Association				
OBRA-01	Overall opposition to the proposal and request that consent be declined. OBRA strongly opposes the application and submits that sand extraction poses unacceptable risks to marine ecosystems, coastal environments and community values. The Association considers that environmental protection and climate resilience should be prioritised over resource extraction.	Planning Team; Relevant Technical Experts	AEE – Overall Assessment of Effects. Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects and Conclusions (Sections 5–7). R.Boyd's statement of evidence dated 12 August 2026.	The Coastal Process Effects Assessment incorporated bathymetric surveys, sediment investigations, seabed characterisation and coastal process modelling to assess potential effects on sediment transport, shoreline stability and coastal morphology. The assessment concluded that the extraction area is located beyond the depth of closure and outside the active nearshore sediment transport system, such that significant effects on beaches, dunes, surf breaks and shoreline processes are not expected. These conclusions are supported by a comprehensive monitoring and adaptive management framework including bathymetric surveys, extraction area monitoring and control area comparisons throughout the life of the project.
vOBRA-02	Potential adverse effects on coastal processes, beaches, dunes and climate resilience. OBRA submits that New Zealand's coastline is increasingly vulnerable to climate change and severe weather events and that sand extraction may reduce the resilience of coastal systems, dunes and beaches to future environmental pressures.	Tonkin + Taylor Ltd; Brown NZ Ltd	Assessment of Surf Break Effects (Attachment 17). Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects and Conclusions (Sections 5–7). R.Reinen-Hamill and E.Beetham’s joint statement of evidence dated 12 August 2026.	Specialist investigations were undertaken to assess potential effects on surf breaks, wave climate and recreational use of the Bream Bay coastline. The assessment concluded that the proposed extraction activity is unlikely to result in measurable changes to wave characteristics, surf break quality or recreational use values due to the offshore location of the extraction area and the limited influence on nearshore coastal processes. These conclusions are consistent with the findings of the Coastal Process and Surf Breaks Effects Assessments (Attachments 8 & 17). MBL defer to Mr Reinen-Hamill and Mr Beetham’s joint statement of evidence in relation to Coastal Processes.
OBRA-03	Potential adverse effects on marine ecology, breeding grounds and food chains. OBRA submits that sand extraction may disrupt marine breeding areas, ecological processes and food-web relationships, causing long-term environmental degradation. The submission relies on expert material lodged with the Panel regarding marine ecology and coastal geomorphology.	Bioresearches Group; NIWA; R.O. Boyd; SLR Consulting NZ	Assessment of Benthic Ecology Effects (Attachment 12) – Appendix C Marine Food Web Dynamics and Potential Effects of Sand Extraction in Te Ākau Bream Bay. Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8). Assessment of Fish and Fisheries Effects (Attachment 16) – Potential Sand Dredging Effects and Conclusions (Sections 5–7).	The Fisheries Effects Assessment evaluated commercial, recreational and customary fisheries resources, habitat availability, fisheries productivity and potential ecological effects arising from dredging activities. The assessment concluded that effects would be localised to the extraction footprint and that significant adverse population-level effects on fisheries resources are unlikely. Monitoring and adaptive management measures are proposed to verify environmental performance and resource condition throughout operations. Detailed assessments of benthic ecology, marine food web dynamics, water quality and ecological functioning were undertaken to evaluate potential effects on marine habitats and biodiversity. The assessments concluded that ecological effects are expected to be localised, that ecological recovery is anticipated following extraction, and that significant adverse ecosystem-level effects are unlikely. The proposed Environmental Monitoring

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				Management Plan provides a comprehensive framework for ongoing monitoring and management of ecological values. MBL defer to Assessment of Benthic Ecology Effects (Attachment 12) – Appendix C Marine Food Web Dynamics and Potential Effects of Sand Extraction in Te Ākau Bream Bay in respect to disruptions to breeding grounds and food-web relationships. Specialist assessments of marine mammals, seabirds and shorebirds considered habitat use, prey availability, underwater noise, vessel activity and potential behavioural responses. The assessments concluded that significant adverse population-level effects on protected species are unlikely. These findings are supported by the Marine Mammal Management Plan, proposed wildlife approval conditions and ongoing monitoring requirements designed to ensure environmental performance is maintained throughout the project.
OBRA-04	MBL's compliance history reduces confidence in the proposal. OBRA refers to the Environment Court proceedings relating to the Pākiri operation and submits that historic compliance issues raise concerns regarding trustworthiness, environmental management and future monitoring arrangements.	Shayne Elstob – Chief Operations Officer, MBL	S.Elstob's statement of evidence dated 12 August 2026.	MBL defer to S.Elstob’s statement of evidence in respect to MBL’s compliance history.
OBRA-05	Economic benefits to Northland are unclear and may not outweigh risks. OBRA submits that most financial benefits accrue to private interests while local communities bear the environmental risks. The Association questions the scale of local employment and economic benefits and supports critiques of MBL's economic evidence.	M.E. Consulting – Lawrence McIlrath	Assessment of Economic Effects (Attachment 18) – Economic Benefits Assessment. AEE – Project Need and Benefits Assessment.	The application includes a detailed assessment of economic, environmental, cultural and social effects. The Economic Effects Assessment identifies significant regional and national benefits associated with maintaining long-term supplies of concrete-grade sand required for housing, infrastructure and economic development. MBL's position is that environmental effects can be appropriately managed through the proposed consent conditions, management plans and monitoring framework, such that the project's benefits can be realised while maintaining acceptable environmental outcomes.. MBL's position is that the proposal delivers significant regional and national benefits while maintaining environmental effects at acceptable levels and is therefore appropriate for approval subject to the recommended conditions.
OBRA-06	Alternative sand sources and sustainable construction materials should be prioritised. OBRA submits that sufficient sand resources already exist and that alternative materials, recycling and sustainable construction technologies should be pursued before approving marine sand extraction.	M.E. Consulting; Paul Donoghue	Assessment of Economic Effects (Attachment 18) – Supply Assessment and Alternative Supply Scenarios. Concrete Suitability Statement (Attachment 20) – Alternative Sand Sources and Concrete Suitability. T.Sawyer’s statement of evidence dated 12 August 2026.	MBL defer to T.Sawyer’s statement of evidence in respect to alternate sand sources such as manufactured sand.
OBRA-07	If approved, the proposal should be subject to a shorter consent duration and independent monitoring. While opposing the proposal, OBRA submits that any approval should include a shorter consent duration, robust independent monitoring and ongoing review of environmental effects.	Planning Team; Relevant Technical Experts	Environmental Monitoring Management Plan (Attachment 29) – Adaptive Management and Monitoring Framework. Recommended Resource Consent Conditions (Attachment 26) – Review Conditions and Monitoring Requirements.	The proposal has been supported by a comprehensive suite of specialist assessments addressing coastal processes, benthic ecology, fisheries, water quality, marine mammals, seabirds, navigation, cultural values and economics. Collectively, these assessments conclude that environmental effects are of a low-negligible order and can be appropriately avoided, remedied or mitigated through the proposed conditions and management plans throughout the 35-year consent term.
7. Parihaka Waka Ama Club Inc.				
PWAC-01	Overall opposition to the proposal due to concerns regarding effects on the ocean and marine environment. Parihaka Waka Ama Club states that its members have a close relationship with the sea through regular paddling and coastal activities. The Club opposes the proposal because of concerns regarding actual and potential future effects on the ocean, marine ecosystems and the wider environment.	Planning Team; Relevant Technical Experts	Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8). AEE – Overall Assessment of Effects. R.Boyd's statement of evidence dated 12 August 2026.	The application includes assessments of navigation safety, coastal processes, recreation and public use values associated with Te Ākau/Bream Bay. MBL defer to R.Boyd’s statement of evidence in relation to recreational movements within the sand extraction area and wider embayment. The proposed extraction area is located approximately 4.7 km offshore and operational activities will occur well beyond areas typically used for coastal recreation and waka ama activities. The Navigation Safety Assessment concluded that vessel movements associated with the proposal can be safely managed through navigational procedures, communication protocols and proposed consent conditions, such that significant adverse effects on recreational use of the coastal environment are not expected.
PWAC-02	Potential impacts on navigation, coastal access and waka ama activities. The Club submits that extraction activities may affect access to coastal waters, create navigational hazards and interfere with waka ama events, training activities and recreational use of the coastal marine area. Concerns are raised regarding paddler safety and potential exclusion from parts of the marine environment.	Captain Bruce Goodchild; Planning Team	Assessment of Navigational Safety Effects (Attachment 19) – Existing Environment, Risk Assessment and Conclusions (Sections 2–6). Recommended Resource Consent Conditions (Attachment 26) – Vessel Management, Navigation Safety and Maritime Communication Conditions. R.Boyd's statement of evidence dated 12 August 2026.	Cultural values, tangata whenua relationships with Te Ākau/Bream Bay, and the importance of maintaining the mauri of the marine environment were specifically considered through multiple Cultural Impact Assessments and tangata whenua engagement processes. These assessments recognise the cultural significance of the receiving environment and informed the development of proposed management measures, monitoring programmes and consent conditions. The application concludes that cultural values can be appropriately recognised and provided for through the proposed environmental management framework and ongoing tangata whenua participation. The proposed extraction area is located approximately 4.7 km offshore and operational activities will occur well beyond areas typically used for coastal recreation and waka ama activities. The Navigation Safety Assessment concluded that vessel movements associated with the proposal can be safely managed through navigational procedures, communication protocols and proposed consent conditions, such that significant adverse effects on recreational use of the coastal environment are not expected. MBL defer to R.Boyd’s statement of evidence in relation to recreational movements within the sand extraction area and wider embayment.
PWAC-03	The proposal provides limited local benefit while exposing local communities to environmental risk. The Club submits that the sand resource will primarily benefit markets outside Northland and that local communities will bear the environmental and social risks associated with the proposal.	M.E. Consulting – Lawrence McIlrath; Planning Team	Assessment of Economic Effects (Attachment 18) – Regional Economic Benefits and Distribution of Benefits (Section 6). AEE – Project Need and Benefits Assessment. C.McCallum's statement of evidence dated 12 August 2026	Specialist fisheries, benthic ecology and water quality assessments evaluated potential effects on fish populations, shellfish resources, benthic habitats and marine food web processes. These investigations concluded that effects would be localised to the extraction footprint, that significant adverse population-level effects on fisheries resources are unlikely, and that ecological recovery is expected over time. Ongoing environmental monitoring is proposed to verify these conclusions and provide mechanisms for adaptive management should unexpected effects arise. MBL defer to Mr McCallum’s evidence in relation to the Projects contribution to improving long term Māori wellbeing, including health, education, housing, employment and environmental restoration initiatives.

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PWAC-04	Precautionary approach and protection of future generations. The Club submits that the long-term wellbeing of Northland communities, future generations and the coastal environment should be prioritised where uncertainty exists regarding potential environmental effects.	Planning Team; Relevant Technical Experts	Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects and Conclusions (Sections 5–7). Environmental Monitoring Management Plan (Attachment 29) – Adaptive Management and Monitoring Framework (Sections 2 and 5).	The application is supported by a comprehensive suite of technical assessments, management plans, monitoring programmes and proposed consent conditions designed to ensure environmental effects are appropriately managed throughout the life of the project. Monitoring of benthic ecology, fisheries, water quality, bathymetry, marine mammals and other environmental indicators will occur throughout operations and be supported by reporting, review and adaptive management provisions. MBL's position is that the proposal can provide important regional and national benefits while maintaining appropriate environmental safeguards for future generations.
8. Minister for Infrastructure				
MI-01	Broad support for the Bream Bay Sand Extraction Project as a project aligned with infrastructure and economic growth objectives. The Minister expresses broad support for projects which deliver positive outcomes for New Zealand, including the Bream Bay Sand Extraction Project, and states that the letter should be taken as reflecting the Government's economic growth and infrastructure priorities.	Planning Team; M.E. Consulting – Lawrence McIlrath	Assessment of Economic Effects (Attachment 18) – Infrastructure Investment Outlook and Demand Outlook (Sections 3–4). AEE – Project Need and Benefits Assessment.	The Minister's comments support the broader rationale underpinning the proposal and recognise the role that aggregate and concrete sand supply can play in supporting infrastructure delivery, economic growth and development outcomes.
MI-02	Infrastructure delivery requires a planning framework that enables growth and development. The Minister notes that infrastructure is important for growth and prosperity and states that the Fast-track Approvals Act was established because the planning system had not been sufficiently enabling of growth.	Planning Team	AEE – Fast-track Approvals Act Assessment and Statutory Assessment. Assessment of Economic Effects (Attachment 18) – Infrastructure Investment Outlook (Section 3).	The Minister's comments provide broader policy context regarding infrastructure delivery and economic growth. While not commenting on environmental effects, the submission supports the proposition that projects contributing to infrastructure supply chains may assist in achieving wider growth and development objectives.
9. Northland Regional Council				
NRC-01	Adequacy of benthic monitoring. NRC's ecological peer reviewer identifies the proposed benthic monitoring programme as the most significant outstanding concern. The review questions whether the proposed monitoring framework is sufficiently robust to detect ecological change within the extraction area, verify recovery assumptions and provide confidence that effects remain within those assessed by the application. NRC considers additional monitoring requirements may be necessary to validate the ecological conclusions reached in the application.	Bioresearches – Simon Vescet, Dubrav von Vinski, Dr Laurens Meynier	Assessment of Benthic Ecology Effects (Attachment 12) – Recommended Conditions and Monitoring (Section 9). Environmental Monitoring Management Plan (Attachment 29) – Benthic Monitoring Framework. S.West's statement of evidence dated 12 August 2026.	The Assessment of Benthic Ecology Effects / Ecological Effects (Attachment 12) concludes that benthic effects will largely be confined to the extraction footprint and that recovery of benthic communities is expected following extraction. The Environmental Monitoring Management Plan (Attachment 29) establishes baseline surveys, post-extraction monitoring and reporting requirements designed to validate assessment predictions. The Recommended Resource Consent Conditions (Attachment 26) provide mechanisms for adaptive management and review should monitoring identify effects beyond those anticipated. MBL also defer to S.West's statement of evidence in relation to the sufficiency of the benthic monitoring sampling methodology and Mr Hay's evidence in terms of the updates to the Environmental Monitoring Management Plan (Attachment 29).
NRC-02	Ecological value of benthic habitat may be understated. NRC's ecological peer reviewer considers the extraction area may contain benthic habitat values of greater significance than recognised in the application. The review suggests that if ecological values are higher than assessed, the significance of ecological effects and the overall effects conclusion may require reconsideration. NRC therefore questions whether the current ecological value assessment appropriately reflects the receiving environment.	Bioresearches – Simon Vescet, Dubrav von Vinski, Dr Laurens Meynier	Assessment of Benthic Ecology Effects (Attachment 12) – Ecological Values and Assessment of Effects (Sections 5–6). S.West's statement of evidence dated 12 August 2026.	The Assessment of Benthic Ecology Effects / Ecological Effects (Attachment 12) includes habitat mapping, benthic sampling and ecological assessment of the extraction area. The assessment concludes that while ecological values are present, the habitat is representative of offshore sand environments and does not contain unique or regionally rare benthic communities that would materially alter the significance assessment. MBL also defer to S.West's statement of evidence which justifies the ecological value of the benthic habitats in Bream Bay.
NRC-03	Control sites may not be representative of the extraction area. NRC raises concerns that differences in sediment characteristics, habitat composition and ecological communities between the proposed control sites and extraction area could reduce confidence in monitoring results. The review submits that this may make it more difficult to distinguish project-related effects from natural variability and therefore reduce the effectiveness of the monitoring programme.	Bioresearches – Simon Vescet, Dubrav von Vinski, Dr Laurens Meynier	Environmental Monitoring Management Plan (Attachment 29) – Benthic Monitoring Design and Control Sites. S.West's statement of evidence dated 12 August 2026.	The Assessment of Benthic Ecology Effects / Ecological Effects (Attachment 12) identifies control sites selected to provide comparison locations outside the extraction footprint. The Environmental Monitoring Management Plan (Attachment 29) provides flexibility for review and refinement of monitoring methodologies should monitoring indicate changes are required. MBL also defer to S.West's statement of evidence in relation to control site selection and relativity.
NRC-04	Ecological effects may be understated. NRC submits that if ecological values and monitoring assumptions are not adequately characterised, the resulting effects assessment may underestimate the significance of impacts on benthic habitats and associated ecological communities. The review therefore recommends a more precautionary interpretation of ecological effects.	Bioresearches – Simon Vescet, Dubrav von Vinski, Dr Laurens Meynier R.O. Boyd	Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8). S.West's statement of evidence dated 12 August 2026.	The Assessment of Benthic Ecology Effects / Ecological Effects (Attachment 12) includes habitat mapping, benthic sampling and ecological assessment of the extraction area. The assessment concludes that while ecological values are present, the habitat is representative of offshore sand environments and does not contain unique or regionally rare benthic communities that would materially alter the significance assessment. MBL also defer to S.West's statement of evidence in relation to the assessed ecological effects.
NRC-05	Coastal process uncertainty and potential shoreline effects. NRC's coastal peer reviewer considers there remains uncertainty regarding the interaction between the offshore extraction area and nearshore coastal processes. The review questions whether sufficient evidence has been provided to fully exclude indirect effects on beach morphology, shoreline stability or sediment supply pathways over the duration of the consent.	Tonkin & Taylor Ltd – E. Beetham, R. Reinen-Hamill, G. Nicholson	Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects and Conclusions (Sections 5–7). R.Reinen-Hamill and E.Beetham's joint statement of evidence dated 12 August 2026.	The Assessment of Coastal Process Effects (Attachment 8) concludes that the extraction area has been selected beyond the active nearshore sediment transport zone and beyond the depth of closure. Modelling indicates negligible effects on beaches, dunes and the wider coastline. MBL also defer to R.Reinen-Hamill and E.Beetham's joint statement of evidence in relation to the interaction between the offshore extraction area and nearshore coastal processes.
NRC-06	Shoreface sediment transport remains uncertain. NRC submits that uncertainty remains regarding sediment exchange processes between offshore and nearshore environments. The review recommends a cautious approach when assessing the potential for long-term changes to coastal sediment dynamics and beach stability.	Tonkin & Taylor Ltd – E. Beetham, R. Reinen-Hamill, G. Nicholson	Assessment of Coastal Process Effects (Attachment 8) – Sediment Transport Assessment and Coastal Process Effects (Sections 4–6). R.Reinen-Hamill and E.Beetham's joint statement of evidence dated 12 August 2026.	The Assessment of Coastal Process Effects (Attachment 8) specifically considers sediment transport pathways and concludes the proposed extraction area is sufficiently offshore that effects on sediment supply to the shoreline are expected to be negligible. MBL also defer to R.Reinen-Hamill and E.Beetham's joint statement of evidence regarding sediment exchange processes between offshore and nearshore environments.
NRC-07	Extraction boundary may need to be further offshore. NRC's coastal review questions whether the proposed extraction boundary provides a sufficient buffer from areas potentially influenced by active sediment	Tonkin & Taylor Ltd – E. Beetham, R. Reinen-Hamill, G. Nicholson	Sand Extraction Operation Plan (Attachment 27) – Extraction Cell Management and Operational Controls (Section 2).	The Assessment of Coastal Process Effects (Attachment 8) assesses alternative extraction boundaries and concludes the proposed extraction area is appropriately located to avoid measurable coastal process effects.

Comment Number	Comment	Applicant Technical Input	Where it is Addressed in the Application Documents	Response
	transport processes. The review suggests further consideration of extraction area location may be warranted.		Recommended Resource Consent Conditions (Attachment 26) – Extraction Area Controls. R.Reinen-Hamill and E.Beetham’s joint statement of evidence dated 12 August 2026.	MBL also defer to R.Reinen-Hamill and E.Beetham's joint statement of evidence regarding the sufficiency of the proposed extraction boundary from areas potentially influenced by active sediment transport processes.
NRC-08	Regional and national economic benefits not clearly demonstrated. NRC submits that the economic case for the proposal relies on assumptions regarding future aggregate demand, infrastructure growth and supply constraints. NRC questions whether the evidence demonstrates a sufficiently clear regional or national benefit to justify the scale and duration of the proposed activity.	M.E. Consulting Paul Donoghue	Assessment of Economic Effects (Attachment 18) – Regional and National Economic Benefits (Section 6). The Concrete Suitability Statement (Attachment 20). L.McIlrath statement of evidence dated 12 August 2026.	The Assessment of Economic Effects (Attachment 18) concludes the proposal provides benefits through increased aggregate supply, support for infrastructure development and reduction of future supply constraints. The Concrete Suitability Statement (Attachment 20) confirms the suitability of the resource for high-strength concrete production. MBL also defer to L.McIlrath’s statement of evidence where Axiom Economics report titled: Bream Bay sand mining: assessment of purported economic effects. A report for the Bream Bay Guardians Society (dated 23 February 2026) where the evidence demonstrates a sufficiently clear regional or national benefit to justify the scale and duration of the proposed activity.
NRC-09	Alternative sand sources have not been adequately assessed. NRC submits that greater consideration should be given to alternative aggregate sources and whether future demand could be met through existing terrestrial or marine supplies. The review questions whether all practicable alternatives have been fully evaluated.	M.E. Consulting Paul Donoghue	Assessment of Economic Effects (Attachment 18) – Supply Assessment and Alternative Supply Scenarios (Sections 3–4). Concrete Suitability Statement (Attachment 20).	The Assessment of Economic Effects (Attachment 18) reviews supply constraints affecting existing aggregate sources and identifies forecast deficits. The Concrete Suitability Statement (Attachment 20) addresses the specific characteristics required for concrete manufacture and the limitations of alternative sources.
NRC-10	Ecological significance of cup corals may be understated. NRC’s ecological peer reviewer considers the ecological and conservation significance of protected cup coral species may be greater than recognised in the application and submits that additional caution may be warranted when assessing potential effects and designing management responses.	NIWA MBL / Bioresearches / NIWA	Assessment of Scleractinian Cup Coral Effects (Attachment 21) – Ecology, Effects Assessment and Conclusions (Sections 4–5). Cup Coral Management Plan (Attachment 30). Schedule 7 of the FTAA (Attachment 15). J.Beaumont's statement of evidence dated 12 August 2026. S.West's statement of evidence dated 12 August 2026.	The Assessment of Scleractinian Cup Corals Effects (Attachment 21) and Cup Corals and Schedule 7 of the FTAA (Attachment 15) specifically assess cup coral distribution and potential effects. The Cup Coral Management Plan (Attachment 30) and Recommended Wildlife Approval Conditions (Attachment 35) provide a detailed avoidance, monitoring and management framework. MBL also defer to J.Beaumont’s of evidence in relation to the assessed ecological significance of cup corals. Additionally, MBL defer to S.West's statement of evidence on Benthic Ecology.
NRC-11	Fish ecological values may be understated. NRC notes that fish communities and associated habitat values form an important component of the receiving environment. The review seeks assurance that ecological values and indirect food-web pathways have been appropriately considered.	R.O. Boyd	Environmental Monitoring Management Plan (Attachment 29) – Adaptive Management Framework and Trigger Levels. Recommended Resource Consent Conditions (Attachment 26) – Review and Adaptive Management Conditions. Assessment of Benthic Ecology Effects (Attachment 12) – Appendix C Marine Food Web Dynamics and Potential Effects of Sand Extraction in Te Ākau Bream Bay. R.O. Boyd's statement of evidence dated 12 August 2026.	The Assessment of Fish and Fisheries Effects (Attachment 16) and Assessment of Benthic Ecology Effects (Attachment 12) concludes that impacts on fish habitat, fisheries productivity and fish populations are expected to be low-negligible and unlikely to result in population-level effects. MBL defer to Assessment of Benthic Ecology Effects (Attachment 12) – Appendix C Marine Food Web Dynamics and Potential Effects of Sand Extraction in Te Ākau Bream Bay in respect to disruptions to food-web pathways and relationships with other biota.
NRC-12	New bathymetric LiDAR information should be considered. NRC submits that recently available bathymetric information may assist in refining understanding of seabed morphology and coastal processes. The review recommends consideration of this information where relevant.	Tonkin & Taylor Ltd – E. Beetham, R. Reinen-Hamill, G. Nicholson	Assessment of Navigational Safety Effects (Attachment 19) – Risk Assessment and Conclusions (Sections 4–6). The Assessment of Coast Process Effects (Attachment 8). R.Reinen-Hamill and E.Beetham's joint statement of evidence dated 12 August 2026.	The Assessment of Coastal Process Effects (Attachment 8) relies on extensive bathymetric and coastal process datasets. Any additional datasets can be considered alongside the existing body of evidence, however they do not alter the fundamental conclusions regarding coastal effects. MBL also defer to R.Reinen-Hamill and E.Beetham's joint statement of evidence regarding the use of new bathymetric LiDAR information.
NRC-13	Cultural concerns raised by tangata whenua remain unresolved. NRC notes that some tangata whenua groups continue to express concerns regarding cultural effects, marine values and participation in management processes. NRC encourages continued engagement and consideration of these matters.	CIA Authors Osborne Hay / Planning Team	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Cultural Effects Assessment and Recommendations. Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A). C.McCallum's statement of evidence dated 12 August 2026	The CIA – Te Pouwhenua o Tiakiriri Kūkupa Trust / Te Parawhau ki Tai (Attachment 22), Draft CIA – Patuharakeke Te Iwi Trust Board (Attachment 23) and CIA – Ngātiwai Trust Board (Attachment 24) identify cultural values and concerns. These matters are addressed through ongoing engagement, proposed conditions and management measures throughout the application material including but not limited to: Environmental Monitoring Management Plan (Attachment 29) where results from their hapu-led monitoring and an assessment of the findings against mātauranga Māori indicators of mauri (Section 5.8 Written Deliverables), Marine Mammal Monitoring Plan (Attachment 28) where it is acknowledged iwi involvement in stranding response is paramount (Section 8.0 Stranding Response), and the Recommended Resource Consent Conditions (Attachment 26) where cultural contribution is offered to recognise the cultural relationship of iwi with the moana and sand resources, and to support ongoing kaitiakitanga and iwi wellbeing initiatives. MBL also defer to C.McCallum’s statement of evidence where cultural matters are addressed in Appendix 1.
NRC-14	Robust monitoring conditions are required. NRC supports the inclusion of comprehensive monitoring requirements and seeks assurance that monitoring results will directly inform management responses and consent review processes where necessary.	Planning Team	Environmental Monitoring Management Plan (Attachment 29) – Monitoring and Reporting Framework. Recommended Resource Consent Conditions (Attachment 26) – Monitoring and Review Conditions. D.Hay statement of evidence dated 12 August 2026.	The Environmental Monitoring Management Plan (Attachment 29) and Recommended Resource Consent Conditions (Attachment 26) establish monitoring, reporting, review and adaptive management mechanisms across ecological and physical environments. MBL defer to D.Hay’s statement of evidence dated in relation to the updated conditions and management plans and planning matters in general.
NRC-15	Consent duration should potentially be reduced. NRC questions whether the proposed consent duration is appropriate given the scale of the activity and the uncertainties identified by peer reviewers. A shorter duration is suggested as a potential risk management measure.	Planning Team	Recommended Resource Consent Conditions (Attachment 26) – Review Conditions and Adaptive Management Framework.	The proposal has been supported by a comprehensive suite of specialist assessments addressing coastal processes, benthic ecology, fisheries, water quality, marine mammals, seabirds, navigation, cultural values and economics. Collectively, these assessments conclude that environmental effects are of a low-negligible order and can be appropriately avoided, remedied or mitigated through the proposed conditions and management plans throughout the 35 year consent term. The Recommended Resource Consent Conditions (Attachment 26) also include monitoring, review and adaptive management provisions intended to provide oversight throughout the consent term.
NRC-16	Independent expert review should be undertaken. NRC recommends that ongoing independent review mechanisms be considered to provide additional confidence in monitoring results, management responses and compliance with consent requirements.	Planning Team Technical Experts	Environmental Monitoring Management Plan (Attachment 29) – Reporting, Review and Independent Oversight Processes.	The application is supported by specialist assessments prepared by recognised experts across ecology, fisheries, marine mammals, coastal processes, water quality, economics and cultural effects. The proposal has also been subject to review through the Fast-track process and submissions received.

Comment Number	Comment	Applicant Technical Input	Where it is Addressed in the Application Documents	Response
				All technical environmental effects assessments have been peer-reviewed through MBL’s pre-lodgement consultation with DOC and NRC – peer-review comments have been considered and appropriately integrated into the application material.
NRC-17	Precautionary approach should be adopted due to uncertainty. NRC submits that where scientific uncertainty exists, management measures should adopt a precautionary approach to ensure adverse effects are avoided or appropriately managed.	All technical experts	Assessment of Coastal Process Effects (Attachment 8) – Comments & Results (Section 10). Environmental Monitoring Management Plan (Attachment 29) – Adaptive Management Framework.	The application incorporates a precautionary framework through monitoring, adaptive management, management plans and review provisions designed to address uncertainty and respond to unexpected effects.
10. Ruakākā Reserve Board Inc (Ruakākā Beach Holiday Park)				
RRB-01	Overall opposition to the proposal due to perceived risks to Te Ākau Bream Bay’s coastal, marine, recreational and conservation values. The Board submits that the proposal threatens the natural character, ecological values and recreational values of the Te Ākau Bream Bay coastline and should be declined.	Planning Team; Relevant Technical Experts	AEE – Overall Assessment of Effects. Assessment of Landscape and Natural Character Effects (Attachment 7) – Assessment of Effects and Conclusions (Sections 8–10).	The application is supported by a comprehensive suite of specialist assessments addressing coastal processes, benthic ecology, fisheries, water quality, marine mammals, seabirds, navigation, recreation, cultural values and economics. Collectively, these assessments conclude that environmental effects can be appropriately avoided, remedied or mitigated through the proposed consent conditions, management plans and monitoring framework. MBL’s position is that the proposal can proceed while maintaining the ecological, recreational and cultural values of Te Ākau/Bream Bay and delivering significant regional and national benefits.
RRB-02	Potential erosion of beaches, dunes and impacts on the Ruakākā Reserve. The Board submits that offshore sand extraction could alter sediment processes, contribute to beach erosion and undermine the dune systems that protect the Ruakākā Reserve, campground and surrounding conservation land. The submission relies on examples from Pākiri, Pouto and Parengarenga.	Tonkin + Taylor Ltd; Brown NZ Ltd	Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects and Conclusions (Sections 5–7). R.Reinen-Hamill and E.Beetham's joint statement of evidence dated 12 August 2026.	The Coastal Process Effects Assessment incorporated bathymetric surveys, sediment investigations, seabed characterisation and coastal process analysis to assess potential effects on sediment transport, shoreline stability and beach morphology. The assessment concluded that the extraction area is located beyond the depth of closure and outside the active nearshore sediment transport system, such that significant effects on beaches, dunes, the Ruakākā coastline and associated reserve land are not expected. These conclusions are supported by proposed bathymetric monitoring, control area comparisons and adaptive management provisions throughout the life of the project. MBL also defer to R.Reinen-Hamill and E.Beetham's joint statement of evidence regarding sediment exchange processes between offshore and nearshore environments.
RRB-03	Potential effects on threatened shorebirds, tara iti and estuarine bird habitat. The Board identifies the Ruakākā Estuary and adjacent coastline as important habitat for tara iti, New Zealand dotterel, banded dotterel, bar-tailed godwit, lesser knot, variable oystercatcher and other threatened species. Concerns are raised regarding feeding habitat, prey availability and disturbance.	NIWA – David Thompson	Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects (Sections 4–5). D.Thompson's statement of evidence dated 12 August 2026.	The Seabirds and Shorebirds Assessment specifically evaluated the distribution, habitat use, feeding ecology and potential exposure pathways for tara iti and other threatened shorebird species. The assessment considered prey availability, vessel activity, sediment plume effects and habitat connectivity and concluded that significant adverse population-level effects are unlikely. Proposed wildlife approval conditions, monitoring requirements and adaptive management provisions provide additional safeguards for protected bird species. Mr Thompson’s statement of evidence dated 12 August 2026 addresses the Endangered Species Foundation’s comments on impacts to coastal breeding and roosting habitats in theme 1 (Paragraphs 8-10) and effects on sediments on seabird prey availability and abundance in theme 2 (Paragraphs 13-18).
RRB-04	Potential adverse effects on dolphins, whales, turtles and marine mammals. The Board submits that bottlenose dolphins regularly use the area and raises concerns regarding underwater noise, habitat disturbance and impacts on migratory marine species including whales and turtles.	SLR Consulting NZ; Styles Group	Assessment of Marine Mammal Effects (Attachment 14) – Environmental Impact Assessment and Conclusions (Sections 4–6). Marine Mammal Management Plan (Attachment 28) – Mitigation and Monitoring Measures. Assessment of Benthic Ecology Effects (Attachment 12). H.McConnell's statement of evidence dated 12 August 2026. M.Pine's statement of evidence dated 12 August 2026.	The Marine Mammal Effects Assessment and Underwater Noise Assessment evaluated species occurrence, habitat use, behavioural responses, vessel interactions and underwater noise generated by extraction activities. These assessments concluded that significant adverse population-level effects on marine mammals and other protected marine fauna are unlikely. The findings are supported by the Marine Mammal Management Plan, operational protocols, monitoring requirements and proposed wildlife approval conditions. The Assessment of Benthic Ecology Effects (Attachment 12) considers effects to marine reptile species including turtles which concluded the likelihood of underwater noise impacts from sand extraction on highly mobile, ‘vagrant’ and ‘migrant’ marine turtles is Negligible. MBL defer to H. McConnell's statement of evidence on Marine Mammals. Additionally, MBL defer to M.Pine's statement of evidence on underwater acoustics.
RRB-05	Potential effects on fisheries, scallops, paddle crabs, reef ecosystems and marine biodiversity. The Board raises concerns regarding Three Mile Reef, scallop populations, paddle crab fisheries, shellfish resources, reef-edge communities and broader ecological productivity within Te Ākau Bream Bay.	R.O. Boyd; Bioresearches Group; NIWA	Assessment of Fish and Fisheries Effects (Attachment 16) – Potential Sand Dredging Effects and Conclusions (Sections 5–7). Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8), Appendix C Marine Food Web Dynamics and Potential Effects of Sand Extraction in Te Ākau Bream Bay. S.West's statement of evidence dated 12 August 2026. R.Boyd's statement of evidence dated 12 August 2026.	Specialist assessments of fisheries resources, benthic ecology, marine biodiversity and ecological functioning evaluated potential effects on scallops, paddle crabs, reef-edge habitats, fish populations and marine food web processes. The assessments concluded that effects will be localised to the extraction footprint, that significant adverse population-level effects on fisheries resources are unlikely, and that ecological recovery is expected following extraction. A comprehensive environmental monitoring programme is proposed to verify environmental performance and ecological recovery over time. MBL also defer to S.West and R.Boyd in their statements of evidence where these matters are considered.
RRB-06	Potential effects on cup corals and protected marine species. The Board notes that cup corals are present within the extraction area and raises concerns regarding the proposed mortality of protected wildlife and compliance with the Wildlife Act.	NIWA	Assessment of Scleractinian Cup Coral Effects (Attachment 21) – Effects Assessment and Conclusions (Sections 4–5). Cup Coral Management Plan (Attachment 30). Recommended Wildlife Approval Conditions (Attachment 35). J.Beaumont's statement of evidence dated 12 August 2026.	The application includes dedicated investigations into the distribution, abundance and ecology of protected cup coral species within and around the extraction area. The Cup Coral Assessment, Cup Coral Management Plan and proposed Wildlife Approval Conditions collectively address potential effects on protected corals through avoidance measures, monitoring requirements, management responses and regulatory oversight. The assessment concluded that effects can be appropriately managed through the proposed framework. Notwithstanding this, MBL also defer to J.Beaumont’s statement of evidence where these matters are considered further.
RRB-07	Concerns regarding MBL's compliance history and the Pākiri operation. The Board relies on allegations regarding trench formation, coastal erosion, consent breaches, seabed damage and Environment Court proceedings relating to the Pākiri operation. It submits that these matters undermine confidence in the proposal.	Planning Team; NIWA	Environmental Monitoring Management Plan (Attachment 29) – Monitoring, Reporting and Adaptive Management Framework. Recommended Resource Consent Conditions (Attachment 26) – Monitoring, Compliance and Review Conditions. S.Elstob's statement of evidence dated 12 August 2026.	The current application has been assessed on its own merits and is supported by a comprehensive suite of technical assessments, management plans and proposed consent conditions specific to Te Ākau/Bream Bay. The proposed consent framework includes extensive monitoring, reporting, review and adaptive management provisions designed to verify environmental performance and ensure compliance throughout the life of the project. The Expert Panel's assessment is focused on the environmental effects, mitigation measures and conditions proposed for the current application. MBL defer to S.Elstob’s statement of evidence dated where MBL’s compliance history is expanded on.

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RRB-08	Alternative sand sources exist and marine sand extraction is unnecessary. The Board submits that land-based quarry sources, manufactured sand, recycled materials and existing aggregate suppliers can meet future demand without requiring marine sand extraction.	M.E. Consulting; Paul Donoghue	Assessment of Economic Effects (Attachment 18) – Supply Assessment and Alternative Supply Scenarios (Sections 3–4). Concrete Suitability Statement (Attachment 20).	The Economic Effects Assessment considered future demand for concrete-grade sand together with existing and potential alternative supply sources, including terrestrial quarries, manufactured sand and existing marine extraction operations. The assessment concluded that a long-term supply deficit is expected to emerge under projected growth scenarios and that alternative sources alone are unlikely to meet future demand. The proposal would contribute to maintaining a secure and diversified supply of construction materials required for housing, infrastructure and economic development.
RRB-09	Potential impacts on recreation, tourism and the Ruakākā Holiday Park. The Board submits that the proposal threatens the recreational, tourism and amenity values of the coastline relied upon by campers, surfers, swimmers, fishers, hikers and visitors to the Ruakākā Reserve and Holiday Park.	Brown NZ Ltd; MetOcean Solutions; Captain Bruce Goodchild	Assessment of Surf Break Effects (Attachment 17) – Assessment of Effects and Conclusions (Sections 5–7). Assessment of Navigational Safety Effects (Attachment 19) – Conclusions and Risk Assessment (Sections 4–6). R.Boyd's statement of evidence dated 12 August 2026.	The application includes assessments of recreation, landscape, natural character, navigation and coastal processes. The proposed extraction area is located approximately 4.7 km offshore and operational activities will not occur within areas used for camping, swimming, surfing, beach recreation or day-to-day holiday park activities. The assessments conclude that significant adverse effects on recreation, tourism, visitor experience or public enjoyment of the coastline are unlikely. MBL also defer to R.O.Boyd's's evidence in relation to movement data within the sand extraction area and the wider embayment.
RRB-10	Precautionary approach and long-term protection of conservation land, reserves and coastal ecosystems. The Board submits that environmental protection obligations under the Reserves Act, Conservation Act and Wildlife Act should take precedence and that the proposal should be declined to avoid irreversible environmental harm.	Planning Team; Relevant Technical Experts	Assessment of Coastal Process Effects (Attachment 8) – Conclusions (Section 7). Environmental Monitoring Management Plan (Attachment 29) – Adaptive Management Framework.	The application has adopted a precautionary approach through extensive baseline investigations, specialist technical assessments, proposed management plans, monitoring programmes and adaptive management provisions. Monitoring of coastal processes, benthic ecology, fisheries, water quality, marine mammals and protected species will occur throughout operations and be supported by reporting, review and management response mechanisms. MBL's position is that the proposal can appropriately protect environmental values while delivering significant regional and national benefits.
11. Whangārei District Council				
WDC-01	Community and stakeholder involvement in the Fast-track process. WDC notes significant community interest in the proposal and states that Council has unanimously adopted a political position encouraging meaningful involvement of stakeholder groups, including Bream Bay Guardians, iwi, hapū and community organisations.	Planning Team	AEE – Consultation and Engagement. Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Consultation Outcomes and Recommendations. Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A).	MBL acknowledges the importance of meaningful stakeholder participation in the Fast-track process and has undertaken extensive engagement with iwi, hapū, community organisations, government agencies, local authorities and other interested parties throughout the development of the proposal. The application has also been subject to invited comments, Requests for Information, public release of technical material and Expert Panel review. MBL considers that the Panel now has the benefit of a comprehensive evidential record addressing environmental, cultural, social and economic matters raised by stakeholders.
WDC-02	Potential land-based effects on Whangārei District infrastructure and services. WDC notes that while offshore extraction is outside its jurisdiction, downstream transport and handling of sand within the district, including through Port Nikau and local transport networks, may have effects on Council-managed infrastructure and services.	Planning Team; Navigation / Transport Input if required	Assessment of Economic Effects (Attachment 18) – Regional Economic Benefits Assessment (Section 6). Sand Extraction Operation Plan (Attachment 27) – Extraction and Operational Methodology (Section 2).	Potential effects associated with the transport, handling and end use of extracted sand have been considered as part of the broader assessment of the proposal. The extraction activity itself occurs offshore and would not effect infrastructure and services within the Whangārei District. The Economic Effects Assessment identifies positive regional economic benefits associated with maintaining a secure supply of construction materials, while any downstream transport and distribution activities remain subject to existing regulatory and operational controls.
WDC-03	Interface with the coastal environment above mean high water springs (MHWS). WDC has an interest in any indirect effects at or above MHWS, including coastal process changes that may influence Council assets or land-based environments. WDC asks the Panel to carefully consider this matter, including technical reports provided by stakeholders.	Tonkin + Taylor Ltd; Planning Team	Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects and Conclusions (Sections 5–7). R.Reinen-Hamill and E.Beetham's joint statement of evidence dated 12 August 2026.	The Coastal Process Effects Assessment specifically evaluated potential effects on shoreline stability, sediment transport processes, beach morphology and coastal environments adjacent to the extraction area. The assessment concluded that the extraction area is located beyond the depth of closure and outside the active nearshore sediment transport system, such that significant effects on beaches, dunes, coastal landforms and environments above MHWS are not expected. These conclusions are supported by proposed bathymetric monitoring, control area comparisons and adaptive management provisions throughout the life of the project. MBL also defer to R.Reinen-Hamill and E.Beetham's joint statement of evidence regarding sediment exchange processes between offshore and nearshore environments.
WDC-04	Noise effects. WDC notes that the technical assessments indicate predicted noise levels from the proposed activity are expected to comply with relevant limits by a significant margin and that this aligns with planning framework expectations within the district.	Styles Group	Assessment of Airborne Noise Effects (Attachment 10) – Noise Assessment Results and Conclusions (Sections 5–6).	The Airborne Noise Assessment evaluated operational noise associated with extraction activities, vessel movements and associated equipment. The assessment concluded that predicted noise levels are expected to remain well within applicable standards and limits, with substantial compliance margins identified for the nearest sensitive receivers. Accordingly, significant adverse noise effects are not anticipated. These findings are consistent with the planning framework and technical conclusions identified by Whangārei District Council.
WDC-05	Economic context and regional benefits. WDC notes the economic assessment identifying regional benefits associated with the supply of sand to northern markets, while encouraging the Panel to consider stakeholder views and technical reports.	M.E. Consulting – Lawrence McIlrath; Planning Team	Assessment of Economic Effects (Attachment 18) – Regional and National Economic Benefits (Section 6).	The Economic Effects Assessment identifies significant regional and national benefits associated with maintaining long-term supplies of concrete-grade marine sand required for housing, infrastructure and economic development. The assessment considered future demand projections, supply constraints and alternative sources and concluded that the proposal would contribute to the resilience and security of construction material supply across the upper North Island. MBL agrees that these benefits should be considered alongside the environmental, cultural and social matters addressed through the wider application and supporting technical assessments.
12. Bream Bay Coastal Care Trust				
BBCCT-01	Cumulative ecological effects have not been adequately assessed. BBCCT submits that the application does not adequately assess cumulative ecological effects when considered alongside other existing or potentially active consents, including the Whangārei Channel Infrastructure Project. BBCCT considers the combined ecological effects of multiple marine activities remain uncertain.	Planning Team; Relevant Technical Experts	Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8). AEE – Cumulative Effects Assessment.	The application includes assessment of cumulative effects across multiple technical disciplines, including benthic ecology, fisheries, marine mammals, seabirds, water quality and coastal processes. Existing and reasonably foreseeable activities within the wider marine environment were considered, including other marine infrastructure and coastal activities where relevant. The assessments conclude that cumulative effects are unlikely to result in significant adverse ecological outcomes and that the proposed monitoring and adaptive management framework provides an ongoing mechanism to verify environmental performance throughout the life of the project.
BBCCT-02	Potential adverse effects on benthic ecology, scallops, crayfish and marine biodiversity. BBCCT disputes suggestions that the extraction area is biologically impoverished and refers to observations and dive surveys identifying scallops, crayfish and other marine life within the broader area.	Bioresearches Group; R.O. Boyd; NIWA	Assessment of Benthic Ecology Effects (Attachment 12) – Ecological Values and Assessment of Effects (Sections 5–6). Assessment of Fish and Fisheries Effects (Attachment 16) – Potential Sand Dredging Effects (Section 5). S.West's statement of evidence dated 12 August 2026.	Detailed investigations of benthic habitats, infaunal communities, epifauna, fisheries resources and marine food web processes were undertaken within and surrounding the extraction area. These assessments considered the distribution of benthic communities, habitat values, recovery processes and ecological functioning. The assessments conclude that effects will be largely confined to the extraction footprint, that ecological recovery is expected over time, and that significant adverse population-level effects on scallops, crayfish, fish populations and wider marine biodiversity are unlikely. Extensive ecological monitoring is proposed to validate these conclusions throughout operations.

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				MBL also defer to S.West’s evidence dated 10 August 2026 where these matters are considered further.
BBCCT-03	Potential adverse effects on shorebirds, seabirds and Wildlife Refuge habitat. BBCCT submits that changes to seabed topography and ecology may affect feeding, nesting and roosting behaviour of shorebirds and seabirds associated with the Waipū Wildlife Refuge and surrounding coastline. Species identified include tara iti, New Zealand dotterel, white-fronted tern, Caspian tern, oystercatchers, bar-tailed godwit, red knot, ruddy turnstone and wrybill.	NIWA – David Thompson	Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects (Sections 4–5). D.Thompson’s statement of evidence dated 12 August 2026.	The Seabirds and Shorebirds Assessment evaluated habitat use, feeding ecology, prey availability and potential indirect effects on protected bird species associated with the Waipū Wildlife Refuge and surrounding coastline. The assessment considered sediment plume effects, ecological pathways, vessel activity and habitat connectivity and concluded that significant adverse population-level effects on shorebirds and seabirds are unlikely. These conclusions are supported by proposed monitoring requirements and wildlife approval conditions. MBL also defer to D.Thompson’s statement of evidence where potential adverse effects on shorebirds and seabirds are given further consideration.
BBCCT-04	Potential impacts on Waipū River Mouth sand systems, dunes and shorebird habitat. BBCCT provides historical observations regarding Waipū River Mouth, dune erosion, spit migration and shoreline dynamics, arguing that coastal sand systems are fragile and that removal of sand from the wider coastal system may have long-term consequences for shorebird habitat and dune stability. Pages 3–4 contain detailed discussion of Waipū River Mouth evolution, spit migration and dune erosion processes.	Tonkin + Taylor Ltd; Brown NZ Ltd	Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects and Conclusions (Sections 5–7). R.Reinen-Hamill and E.Beetham's joint statement of evidence dated 12 August 2026.	The Coastal Process Effects Assessment incorporated bathymetric surveys, sediment investigations, seabed characterisation and coastal process analysis to assess potential effects on sediment transport pathways, shoreline stability, spit dynamics and dune systems. The assessment concluded that the extraction area is located beyond the depth of closure and outside the active nearshore sediment transport system, such that significant effects on the Waipū River Mouth, Waipū Spit, adjacent dunes and associated shorebird habitat are not expected. These findings are supported by proposed bathymetric monitoring and adaptive management provisions. MBL also defer to R.Reinen-Hamill and E.Beetham's joint statement of evidence regarding sediment exchange processes between offshore and nearshore environments.
BBCCT-05	Potential effects on tara iti breeding habitat and recovery efforts. BBCCT adopts material from the New Zealand Fairy Tern Charitable Trust, which argues that Waipū Sandspit is one of only four regularly used breeding sites for tara iti and that changes to sand systems or habitat conditions could adversely affect breeding success and future recovery efforts.	NIWA – David Thompson	Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects on Tara iti and Shorebirds (Sections 4–5). D.Thompson's statement of evidence dated 12 August 2026.	The application includes a dedicated assessment of potential effects on tara iti and other threatened shorebird species. The assessment considered breeding habitat, feeding ecology, prey availability, habitat connectivity and indirect ecological pathways. NIWA concluded that the proposal is unlikely to result in significant adverse effects on tara iti breeding success, population viability or recovery efforts. Proposed wildlife approval conditions and ongoing monitoring provide additional safeguards for this nationally critical species. MBL also defer to D.Thompson’s statement of evidence where these matters are given further consideration.
BBCCT-06	DOC satellite tracking data and offshore foraging behaviour of tara iti. BBCCT relies on the New Zealand Fairy Tern Charitable Trust material and DOC tracking information showing juvenile tara iti can travel substantial distances and may utilise offshore marine habitats. BBCCT submits that the role of offshore foraging habitat remains incompletely understood and should be treated cautiously. Pages 5–6 refer to satellite tracking information and recent research regarding tara iti foraging behaviour.	NIWA – David Thompson; Planning Team	Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects (Sections 4–5). AEE – Assessment of Scientific Information and Overall Effects. D.Thompson's statement of evidence dated 12 August 2026.	The assessment of seabird and shorebird effects considered available information regarding tara iti distribution, habitat use and foraging behaviour. While recent tracking data continues to improve understanding of species movements, the assessment concluded that the offshore extraction area does not represent a critical breeding habitat and that ecological pathways linking extraction activities to population-level effects remain weak. MBL's position is that the available evidence does not indicate that the proposal will adversely affect tara iti recovery objectives, while acknowledging that ongoing research continues to improve understanding of the species' ecology. MBL also defer to D.Thompson’s statement of evidence where DOC satellite tracking data and offshore foraging behaviour of tara iti is considered.
BBCCT-07	Lack of confidence arising from MBL's Pākiri operations and strong community opposition. BBCCT refers to MBL's historic Pākiri operations and notes strong local opposition to the proposal. The Trust submits that these matters reduce confidence in the proposal and support a precautionary approach.	Planning Team; NIWA	Environmental Monitoring Management Plan (Attachment 29) – Monitoring, Reporting and Adaptive Management Framework. Recommended Resource Consent Conditions (Attachment 26) – Monitoring, Review and Compliance Conditions. S.Elstob's statement of evidence dated 12 August 2026.	The current application has been assessed on its own merits and is supported by a comprehensive suite of technical assessments, management plans and proposed consent conditions specific to Te Ākau/Bream Bay. The proposed consent framework includes extensive monitoring, reporting, review and adaptive management provisions designed to verify environmental performance and ensure compliance throughout the life of the project. The Expert Panel's assessment is focused on the environmental effects, mitigation measures and conditions proposed for the current application rather than historical activities undertaken elsewhere. MBL defer to S.Elstob’s statement of evidence dated where MBL’s compliance history is expanded on.
13. Minister for Building and Construction				
MBC-01	Support for the proposal due to its strategic importance for housing supply and construction material availability. The Minister supports referral and consideration of the proposal through the Fast-track process and considers the project has strategic merit from a building and construction perspective. The Minister notes that housing supply depends on maintaining access to cost-effective sources of aggregate and concrete sand.	M.E. Consulting – Lawrence McIlrath; Paul Donoghue; Planning Team	Assessment of Economic Effects (Attachment 18) – Infrastructure Investment Outlook and Demand Outlook (Sections 3–4). AEE – Project Need and Benefits Assessment.	The Minister's comments support the application's assessment that maintaining access to suitable concrete sand is important for future housing and infrastructure delivery.
MBC-02	Marine sand is an essential component of high-strength concrete used in Auckland housing and development. The Minister notes that approximately 60% of concrete poured in Auckland is high-strength concrete and that marine quartz feldspar sands are an important component of multi-storey housing construction.	Paul Donoghue	Concrete Suitability Statement (Attachment 20) – Concrete Sand Suitability and Use in High-Strength Concrete. Assessment of Economic Effects (Attachment 18) – Demand Outlook (Section 4). P.Donoghue's statement of evidence dated 12 August 2026.	The Minister's comments are consistent with MBL's technical evidence regarding the importance of suitable marine sand for high-strength concrete production and future construction demand.
MBC-03	The proposal helps secure long-term supply following the closure of Pākiri and uncertainty regarding Kaipara Harbour consents. The Minister notes that the project responds to supply constraints arising from the closure of the Pākiri extraction site and potential expiry of Kaipara Harbour consents. The Minister also notes alignment with the Minerals Strategy for New Zealand to 2040 and the Resource Strategy for Aotearoa New Zealand.	M.E. Consulting – Lawrence McIlrath; Planning Team	Assessment of Economic Effects (Attachment 18) – Supply Assessment and Future Supply Constraints (Sections 3–4). Concrete Suitability Statement (Attachment 20) – Alternative Sources and Supply Considerations.	The application identifies forecast supply constraints affecting future concrete sand availability and assesses the role of the proposal in providing a long-term source of suitable sand for Auckland and the upper North Island.
MBC-04	Reduced transport costs, improved efficiency and substantial economic savings. The Minister notes that Bream Bay is closer to Auckland than the Kaipara Harbour operation and refers to the Economic Assessment estimate that the proposal could deliver	M.E. Consulting – Lawrence McIlrath	Assessment of Economic Effects (Attachment 18) – Economic Benefits Assessment (Section 6).	The Minister's comments support the conclusions of the Economic Effects Assessment regarding transport efficiencies, avoided costs and improved supply chain performance associated with the proposal.

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	approximately \$258.2 million in net cost savings through improved logistics and reduced transport costs.			
MBC-05	Improved supply certainty, competition and housing affordability outcomes. The Minister submits that an additional source of construction sand will improve long-term supply certainty, reduce market concentration, improve competition and help avoid future price escalation affecting housing delivery. The Minister concludes that the proposal aligns with broader Government objectives relating to housing supply, infrastructure delivery and construction material resilience.	M.E. Consulting – Lawrence McIlrath; Planning Team	Assessment of Economic Effects (Attachment 18) – Economic Benefits Assessment and Supply Assessment (Sections 4 and 6). AEE – Project Need and Benefits Assessment.	The Minister's comments are generally consistent with MBL's economic evidence, which identifies benefits associated with increased competition, supply resilience and support for housing and infrastructure delivery.
14. Te Rerenga Parāoa Rohe Moana Kaitiaki				
TRP-01	Unbroken ancestral connection to Te Ākau and Te Rerenga Parāoa. Mr Solomon states that Te Rerenga Parāoa Rohe Moana and Patuharakeke maintain an unbroken connection to Te Ākau through customary use, occupation, kaitiakitanga, gathering of kaimoana and ongoing stewardship responsibilities. He submits that the proposal directly affects this relationship.	Cultural Advisors; Planning Team	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Cultural Values, Relationship with Te Ākau and Assessment of Effects. Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A).	The application recognises the longstanding cultural, historical and customary relationship of tangata whenua with Te Ākau/Bream Bay through extensive engagement, multiple Cultural Impact Assessments and consideration of mātauranga Māori throughout the assessment process. The Cultural Impact Assessments acknowledge the importance of mana whenua, mana moana, kaitiakitanga and customary use of the marine environment and informed the development of proposed management measures, monitoring programmes and consent conditions.
TRP-02	Potential adverse effects on taonga species including tipa (scallops), pipi, tuatua and kōura. Mr Solomon submits that Te Ākau supports important taonga species and that the extraction activity may adversely affect their habitats, recovery and long-term sustainability. Particular emphasis is placed on tipa (scallops).	R.O. Boyd; Bioresearches Group; Cultural Advisors	Assessment of Fish and Fisheries Effects (Attachment 16) – Existing Environment and Potential Sand Dredging Effects (Sections 4–5). Assessment of Benthic Ecology Effects (Attachment 12) – Ecological Values and Assessment of Effects (Sections 5–6). S.West's statement of evidence dated 12 August 2026.	Specialist fisheries, benthic ecology and water quality assessments evaluated potential effects on shellfish resources, fish populations, benthic habitats and ecological functioning within and surrounding the extraction area. These assessments concluded that effects would be largely confined to the extraction footprint and that significant adverse population-level effects on fisheries resources are unlikely. The proposed monitoring programme provides an ongoing mechanism to verify environmental performance and resource condition throughout operations. MBL also defer to S.West’s statement of evidence in relation to the effects on taonga species including tipa (scallops).
TRP-03	Risk to scallop restoration and regeneration efforts. Mr Solomon states that rāhui, restoration initiatives and reseedling efforts are contributing to the recovery of scallop populations and that the proposal may undermine this recovery. He considers the receiving environment remains fragile and in a recovery phase.	R.O. Boyd; Bioresearches Group	Assessment of Fish and Fisheries Effects (Attachment 16) – Effects on Fisheries Resources and Conclusions (Sections 5–7). S.West's statement of evidence dated 12 August 2026.	The Fisheries Effects Assessment and Benthic Ecology Assessment specifically considered the status of scallop populations, habitat availability, recovery processes and ecological resilience. The assessments concluded that while localised disturbance will occur within the extraction area, significant adverse effects on wider scallop populations and recovery initiatives are unlikely. Monitoring of benthic communities and fisheries resources is proposed to verify ecological recovery and inform adaptive management where necessary.
TRP-04	Removal of sand is inconsistent with tikanga because sand forms part of a living system supporting the mauri of the moana. Mr Solomon submits that sand is not simply a physical resource but forms part of a wider ecological and cultural system supporting taonga species, habitats and environmental balance.	Cultural Advisors; Planning Team	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Cultural Values, Mauri and Kaitiakitanga Assessment. Recommended Resource Consent Conditions (Attachment 26)	The application acknowledges that tangata whenua may hold differing cultural perspectives regarding the appropriateness of marine sand extraction. Cultural values, mātauranga Māori, kaitiakitanga responsibilities and the relationship between environmental health and mauri were specifically considered through the Cultural Impact Assessments. MBL's position is that cultural effects can be appropriately recognised and managed through the proposed cultural engagement framework, management plans, monitoring provisions and consent conditions, while enabling the proposal's broader benefits to be realised. Notwithstanding this, the Recommended Resource Consent Conditions (Attachment 26) offer a Mahere Tikanga Plan (Condition 47) and a Cultural Contribution (Condition 44) to recognise the cultural relationship of iwi with the moana and sand resources, and to support ongoing kaitiakitanga and iwi wellbeing initiatives.
TRP-05	Sand is effectively non-renewable and removal causes permanent environmental change. Mr Solomon submits that seabed sand should be treated as a non-renewable resource and that extraction represents a permanent alteration of ecological systems and natural processes.	Tonkin + Taylor Ltd; Bioresearches Group; Planning Team	Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects and Conclusions (Sections 5–7). Assessment of Benthic Ecology Effects (Attachment 12) – Ecological Conclusions (Section 8).	The Coastal Process Effects Assessment, Benthic Ecology Assessment and Fisheries Assessment evaluated the nature, scale and duration of environmental effects associated with sand extraction. These assessments concluded that while extraction results in localised seabed disturbance within the operational footprint, significant adverse effects on wider coastal processes, ecological functioning and sediment systems are unlikely. The assessments further conclude that recolonisation and ecological recovery are expected to occur over time, supported by monitoring and adaptive management measures.
TRP-06	The proposal conflicts with tikanga, mana moana and kaitiakitanga obligations. Mr Solomon submits that the proposal is fundamentally inconsistent with tikanga and with the responsibilities held by tangata kaitiaki to protect the mauri of the moana and sustain resources for future generations.	Cultural Advisors; Planning Team	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Cultural Effects Assessment and Recommendations. Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A). Recommended Resource Consent Conditions (Attachment 26). C.McCallum's statement of evidence dated 12 August 2026.	The application recognises the importance of tikanga Māori, mana moana and kaitiakitanga as fundamental cultural values held by tangata whenua. These matters were considered through multiple Cultural Impact Assessments and engagement processes. While some groups oppose marine sand extraction as a matter of principle, MBL considers that the proposed environmental management framework, tangata whenua participation mechanisms and cultural mitigation measures provide an appropriate means of recognising and responding to cultural values within the statutory decision-making framework. Notwithstanding this, the Recommended Resource Consent Conditions (Attachment 26) offer a Mahere Tikanga Plan (Condition 47) and a Cultural Contribution (Condition 44) to recognise the cultural relationship of iwi with the moana and sand resources, and to support ongoing kaitiakitanga and iwi wellbeing initiatives.
TRP-07	The proposal may undermine the group's MACA application and mana moana interests. Mr Solomon notes that Te Rerenga Parāoa is actively pursuing a Marine and Coastal Area (Takutai Moana) Act application and submits that the proposal risks undermining the interests being advanced through that process.	Planning Team; Legal Team	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Tangata Whenua Interests and Cultural Effects Assessment. C.McCallum’s statement of evidence dated 12 August 2026	The application recognises that a number of tangata whenua groups hold or are pursuing rights and interests under the Marine and Coastal Area (Takutai Moana) Act. The proposal has been assessed within the relevant statutory framework and includes engagement with affected iwi and hapū groups. The Expert Panel will determine the weight to be given to customary interests and MACA-related matters alongside the environmental, cultural, social and economic assessments before it. MBL defer to Attachment 5 – Consultation Summary in relation to MBL’s engagement and consultation with MACA applicants. MBL also defer to C.McCallum’s statement of evidence where further context is provided in terms of MBL’s engagement with MACA applicants.

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TRP-08	Conditions cannot remedy the cultural effects because the activity itself is unacceptable. Mr Solomon states that pre-start hui, cultural protocols and engagement requirements do not address the fundamental cultural objection to the extraction of sand from Te Ākau. He submits that the activity should not proceed regardless of conditions.	Cultural Advisors; Planning Team	Recommended Resource Consent Conditions (Attachment 26) – Cultural Liaison, Engagement and Monitoring Conditions. Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Recommendations and Mitigation Measures.	The application acknowledges that some submitters oppose the proposal in principle and consider that no package of conditions could adequately address their concerns. MBL's position is that the proposal has been supported by extensive cultural, environmental and technical assessments and that the proposed consent conditions, management plans, monitoring requirements and tangata whenua engagement provisions provide a robust framework for avoiding, remedying or mitigating adverse effects. Whether those measures are sufficient is ultimately a matter for determination by the Expert Panel.
15. Aggregate and Quarry Association				
AQA-01	Aggregate and sand resources are essential to infrastructure, housing and economic development. AQA submits that aggregate and sand are fundamental construction materials underpinning roads, buildings, infrastructure and economic growth. The Association notes that New Zealand consumes approximately 48 million tonnes of aggregate annually and that future infrastructure demand will increase.	M.E. Consulting – Lawrence McIlrath; Planning Team	Assessment of Economic Effects (Attachment 18) – Infrastructure Investment Outlook and Demand Outlook (Sections 3–4). AEE – Project Need and Benefits Assessment.	AQA's comments are generally consistent with MBL's economic evidence regarding the importance of aggregate and concrete sand resources to future infrastructure and construction demand.
AQA-02	Population growth, infrastructure deficits and climate adaptation will increase future demand for aggregate and sand. AQA submits that future population growth, housing demand, infrastructure investment and climate resilience projects will require increasing quantities of aggregate resources, including sand for concrete production and coastal protection works.	M.E. Consulting – Lawrence McIlrath	Assessment of Economic Effects (Attachment 18) – Infrastructure Investment Outlook and Demand Outlook (Sections 3–4). P.Donoghue's statement of evidence dated 12 August 2026.	AQA's comments support the conclusions of the Economic Effects Assessment regarding forecast increases in demand for construction materials and the importance of maintaining reliable supply options. Additionally, MBL defer to P.Donoghue's statement of evidence on Concrete Suitability.
AQA-03	Marine sand extraction is an established component of Auckland's construction material supply chain. AQA notes that marine sand extraction has operated in New Zealand for more than 75 years and that marine-dredged sand has historically supplied a significant proportion of Auckland's concrete sand requirements. AQA records the cessation of the Mangawhai-Pākiri operation in 2025 and notes the continued reliance on marine sand and other sand sources for Auckland construction markets.	M.E. Consulting – Lawrence McIlrath; Paul Donoghue	Assessment of Economic Effects (Attachment 18) – Supply Assessment and Future Supply Constraints (Sections 3–4). Concrete Suitability Statement (Attachment 20).	AQA's comments support the application's assessment that marine sand has historically formed an important component of Auckland's construction material supply chain and that future supply diversity remains important.
AQA-04	All available sand sources should remain available to maintain supply resilience and competitive pricing. AQA submits that Auckland consumes more than one million tonnes of sand annually and that multiple sources of supply are required to ensure continuity of supply, competition and price stability. The Association states that marine, manufactured and land-based sand sources should all remain available.	M.E. Consulting – Lawrence McIlrath; Paul Donoghue	Assessment of Economic Effects (Attachment 18) – Supply Assessment, Market Demand and Economic Benefits (Sections 4 and 6).	AQA's comments align with MBL's evidence regarding supply resilience, competition benefits and the importance of maintaining a diverse portfolio of suitable aggregate and concrete sand resources.
AQA-05	Marine aggregate extraction can be sustainably managed under appropriate environmental controls. AQA submits that marine extraction should occur only in suitable locations and under robust environmental regulation, but notes that internationally recognised extraction practices can minimise environmental effects. AQA supports the continued availability of marine aggregate resources where environmental effects can be appropriately managed.	Planning Team; Relevant Technical Experts	Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects and Conclusions (Sections 5–7). Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8). Environmental Monitoring Management Plan (Attachment 29) – Monitoring and Adaptive Management Framework.	The application includes a comprehensive environmental assessment and management framework intended to ensure environmental effects are appropriately avoided, remedied or mitigated through monitoring, adaptive management and consent conditions.
16. Waipū Residents and Ratepayers Association Inc.				
WRRRA-01	Overall opposition to the proposal and support for decline of the application. WRRRA opposes the proposal in its entirety and submits that the environmental risks identified by community groups outweigh any claimed benefits. WRRRA expressly aligns its submission with the Ruakākā Residents and Ratepayers Association position.	Planning Team; Relevant Technical Experts	AEE – Overall Assessment of Effects and Project Need. Assessment of Economic Effects (Attachment 18) – Conclusions (Section 6). L.McIlrath statement of evidence dated 12 August 2026.	The application is supported by a comprehensive suite of specialist assessments addressing coastal processes, benthic ecology, fisheries, water quality, marine mammals, seabirds, navigation, recreation, cultural values and economics. Collectively, these assessments conclude that environmental effects can be appropriately avoided, remedied or mitigated through the proposed consent conditions, management plans and monitoring framework. MBL's position is that the proposal can proceed while maintaining the environmental, recreational and cultural values of Te Ākau/Bream Bay and delivering significant regional and national benefits.
WRRRA-02	The beach is the community's most important asset and should not be placed at risk. WRRRA submits that Bream Bay's beaches are fundamental to community identity, lifestyle, health and wellbeing. The submission states that the beach environment is the primary reason many residents choose to live in the area and that any activity potentially affecting beach quality should be approached with caution.	Brown NZ Ltd; Tonkin + Taylor Ltd; Planning Team	Assessment of Coastal Process Effects (Attachment 8) – Comments & Results (Section 10). Assessment of Landscape and Natural Character Effects (Attachment 7) – Conclusions (Sections 12).	The Coastal Process Effects Assessment specifically evaluated potential effects on shoreline stability, sediment transport, beach morphology and dune systems. The assessment concluded that the extraction area is located beyond the depth of closure and outside the active nearshore sediment transport system, such that significant effects on beaches, dunes and coastal landforms are not expected. These conclusions are supported by extensive baseline investigations, bathymetric monitoring and adaptive management provisions designed to verify environmental performance throughout the life of the project.
WRRRA-03	Potential adverse effects on tourism, recreation and visitor expenditure. WRRRA submits that Bream Bay's tourism sector relies heavily on the area's beaches, clear water, fishing, diving, surfing and coastal recreation opportunities. The submission refers to campgrounds, motels, hospitality businesses, fishing charters, surf schools and other visitor-dependent businesses.	M.E. Consulting; Brown NZ Ltd; MetOcean Solutions	Assessment of Economic Effects (Attachment 18) - Conclusions (Section 6) . Assessment of Surf Break Effects (Attachment 17) – Assessment of Effects and Conclusions (Sections 5–7). L.McIlrath statement of evidence dated 12 August 2026.. R.O. Boyd's statement of evidence dated 12 August 2026.	The application includes assessments of recreation, coastal amenity, landscape and natural character, together with an assessment of regional economic effects. The proposed extraction area is located approximately 4.7 km offshore and operational activities will not occur within areas used for swimming, surfing, beach recreation or tourism activities. The assessments conclude that significant adverse effects on recreation, visitor experience or tourism-related activity are unlikely, while the project is expected to generate broader economic benefits through supporting construction activity and infrastructure delivery.
WRRRA-04	Potential adverse effects on local businesses and the seasonal economy. WRRRA submits that many local businesses rely on summer visitor activity associated with the beach environment. The submission refers to campgrounds, accommodation providers, retail businesses,	M.E. Consulting – Lawrence McIlrath	Assessment of Economic Effects (Attachment 18) - Conclusions (Section 6) (Section 6). L.McIlrath statement of evidence dated 12 August 2026.	The Economic Effects Assessment considered both direct and indirect economic effects associated with the proposal. The assessment concluded that maintaining a secure long-term supply of concrete-grade sand provides significant benefits for housing, infrastructure and economic development across the upper North Island. While community concerns regarding local economic effects have been considered, the technical assessments do not

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	hospitality operators and tourism-related enterprises that benefit from beach-based recreation.			identify a mechanism by which the offshore extraction activity would result in significant adverse effects on local businesses, accommodation providers or tourism operators.
WRRRA-05	Strong community opposition and lack of social licence. WRRRA refers to public events organised by Bream Bay Guardians, community opposition, protest signage and widespread local concern regarding the proposal. The Association submits that strong local opposition should be given significant weight.	Planning Team	AEE – Consultation and Engagement. Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Consultation Outcomes and Recommendations. Consultation Summary (Attachment 5).	The application acknowledges that there are differing views regarding the proposal within the community. Community feedback, invited comments and stakeholder submissions form part of the broader evidential record before the Expert Panel. MBL has undertaken extensive engagement with iwi, hapū, community organisations, local authorities, industry groups and government agencies throughout the development of the proposal. The ultimate assessment of the proposal is based on the statutory criteria of the Fast-track Approvals Act, informed by the technical evidence and submissions received.
WRRRA-06	No demonstrated need for the proposal because Auckland does not face a sand shortage. WRRRA adopts material prepared by Bream Bay Guardians and submits that there is no demonstrated shortage of construction sand requiring the environmental risks associated with the proposal.	M.E. Consulting – Lawrence McIlrath; Paul Donoghue	Assessment of Economic Effects (Attachment 18) – Sand Market and Outlook and Avoided Costs and Benefits (Sections 3–4). Concrete Suitability Statement (Attachment 20). P.Donoghue's statement of evidence dated 12 August 2026.	The Economic Effects Assessment evaluated future demand for suitable concrete-grade sand, existing supply sources and projected supply constraints across the upper North Island. The assessment concluded that a long-term supply deficit is expected to emerge under projected growth scenarios and that existing consented marine sand resources and alternative sources are unlikely to fully meet future demand. The proposal would contribute to maintaining a secure and diversified supply of construction materials required to support housing, infrastructure and economic development. Additionally, MBL defer to P.Donoghue's statement of evidence on Concrete Suitability.
17. Waipu Cove Reserve Board				
WCRB-01	Overall opposition and request that the application be declined. WCRB submits that the proposal has the potential to cause significant and irreversible adverse effects on the coastal environment, Camp Waipū Cove and the Northland economy. The Board considers the proposal inconsistent with planning documents and the purpose of the RMA.	Planning Team; Relevant Technical Experts	AEE – Overall Assessment of Effects and Statutory Assessment. Assessment of Economic Effects (Attachment 18) Avoided Costs and Benefits (Section 4).	The application is supported by a comprehensive suite of specialist assessments addressing coastal processes, benthic ecology, fisheries, water quality, marine mammals, seabirds, recreation, navigation, cultural values and economics. Collectively, these assessments conclude that environmental effects can be appropriately avoided, remedied or mitigated through the proposed consent conditions, management plans and monitoring framework. MBL's position is that the proposal can proceed while maintaining the environmental, recreational and cultural values of Te Ākau/Bream Bay and delivering significant regional and national benefits.
WCRB-02	Risk to the Bream Bay sediment system, beaches and dune systems. WCRB submits that offshore sand forms part of an interconnected sediment system supporting beach and dune stability. The Board considers there is insufficient certainty that long-term sediment removal will not adversely affect shoreline stability, beach width, dune resilience and coastal hazard protection functions.	Tonkin + Taylor Ltd	Assessment of Coastal Process Effects (Attachment 8) – Sediment Transport Assessment, Coastal Process Effects and Conclusions (Sections 4–7).	The Coastal Process Effects Assessment incorporated bathymetric surveys, sediment investigations, seabed characterisation and coastal process analysis to evaluate potential effects on sediment transport pathways, shoreline stability, beach morphology and dune systems. The assessment concluded that the extraction area is located beyond the depth of closure and outside the active nearshore sediment transport system, such that significant effects on beaches, dunes and coastal hazard protection functions are not expected. These conclusions are supported by proposed bathymetric monitoring, control area comparisons and adaptive management provisions throughout the life of the project.
WCRB-03	Scientific uncertainty and reliance on modelling. WCRB submits that sediment transport, storm processes and long-term coastal behaviour remain inherently uncertain and that the modelling relied on by MBL does not provide sufficient confidence to justify extraction at the proposed scale.	Tonkin + Taylor Ltd; Planning Team	Assessment of Coastal Process Effects (Attachment 8) – Methodology, Sediment Transport Assessment and Conclusions (Sections 3–7).	The Coastal Process Effects Assessment was informed by multiple lines of evidence, including field investigations, sediment sampling, bathymetric surveys, existing scientific literature and coastal process analysis. The assessment considered uncertainty explicitly and concluded that the proposed extraction activity is unlikely to result in significant adverse coastal process effects. The proposed monitoring and adaptive management framework provides an additional mechanism to verify predictions and respond appropriately should monitoring identify unexpected outcomes.
WCRB-04	Potential irreversible effects and inability to replace removed sediment. WCRB submits that extracted sediment is permanently removed from the system and that any errors in predictions may only become apparent after irreversible environmental change has occurred.	Tonkin + Taylor Ltd; Planning Team	Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects and Conclusions (Sections 5–7). Assessment of Benthic Ecology Effects (Attachment 12) – Ecological Conclusions (Section 8).	The application acknowledges that extraction results in localised removal of seabed sediment within the operational footprint. However, specialist assessments concluded that significant adverse effects on wider coastal processes, shoreline stability and ecological functioning are unlikely due to the offshore location of the extraction area and its separation from active nearshore sediment transport systems. The assessments further conclude that ecological recolonisation and recovery are expected to occur over time, supported by monitoring and adaptive management measures.
WCRB-05	Potential adverse effects on Camp Waipū Cove, tourism and local businesses. WCRB notes that Camp Waipū Cove provides approximately 81,840 visitor nights annually and contributes significantly to the local economy. The Board submits that any reduction in beach quality, surf conditions, amenity or environmental values could adversely affect tourism, recreation and local businesses.	M.E. Consulting; Brown NZ Ltd; MetOcean Solutions; B.Beamsley	Assessment of Economic Effects (Attachment 18) – Regional Economic Benefits (Section 6). Assessment of Surf Break Effects (Attachment 17) – Assessment of Effects and Conclusions (Sections 5–7). B.Beamsley statement of evidence dated 12 August 2026.	The application includes assessments of recreation, landscape and natural character, coastal amenity and economic effects. The proposed extraction area is located approximately 4.7 km offshore and operational activities will not occur within areas used for camping, swimming, surfing or other recreational activities associated with Camp Waipū Cove. The assessments conclude that significant adverse effects on recreation, tourism, visitor experience or tourism-dependent businesses are unlikely. Dr Brett Beamsley that modelling shows the proposed extraction will have negligible to imperceptible effects on surf breaks, wave conditions and recreational wave amenity throughout Te Ākau Bream Bay. He finds the concerns raised by submitters are not supported by the modelling evidence.
WCRB-06	Potential contribution to nuisance algae blooms. WCRB refers to historic red algae bloom events in Bream Bay and submits that dredging and disturbance of seabed sediments may mobilise nutrients and contribute to increased frequency or severity of future blooms, with adverse effects on recreation, tourism and community wellbeing.	SLR Consulting NZ; Bioresearches Group; E.Jones	Assessment of Water Quality Effects (Attachment 9) – Assessment of Water Quality Effects and Conclusions (Sections 5–8). E.Jones statement of evidence dated 12 August 2026.	Water quality investigations assessed sediment plume generation, suspended sediment concentrations, plume dispersion and potential ecological effects associated with extraction activities. The assessment concluded that sediment plume effects will be temporary, localised and rapidly dissipated within the receiving environment. No mechanism was identified by which the proposed extraction activity would be expected to materially increase the frequency or severity of nuisance algal bloom events. Ongoing water quality monitoring is proposed to verify environmental performance throughout operations. MBL defer to E.Jones statement of evidence on Water Quality.
WCRB-07	Cumulative effects with other extraction activities. WCRB submits that cumulative effects should be assessed alongside other existing extraction consents and marine activities within Bream Bay, including Channel Infrastructure projects. The Board considers cumulative sediment removal may lead to long-term degradation of the coastal system.	Planning Team; Relevant Technical Experts	AEE – Cumulative Effects Assessment. Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects (Sections 5–6).	The application includes consideration of cumulative effects across multiple technical disciplines, including coastal processes, benthic ecology, fisheries, marine mammals and seabirds. Existing and reasonably foreseeable activities within the wider marine environment were considered where relevant. The assessments conclude that cumulative effects are unlikely to result in significant adverse environmental outcomes and that the proposed monitoring framework provides an ongoing mechanism to verify environmental performance over time.

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WCRB-08	Adaptive management and monitoring are insufficient safeguards. WCRB submits that monitoring detects effects after they occur and cannot prevent irreversible damage. Concerns are raised regarding enforceability, monitoring practicality, offshore operations, night-time activities and reliance on adaptive management responses.	Planning Team; Relevant Technical Experts	Environmental Monitoring Management Plan (Attachment 29) – Monitoring, Reporting and Adaptive Management Framework. Recommended Resource Consent Conditions (Attachment 26) – Monitoring, Review and Adaptive Management Conditions.	The Environmental Monitoring Management Plan establishes a comprehensive monitoring programme covering bathymetry, benthic ecology, fisheries, water quality, marine mammals and other environmental indicators. Monitoring is supported by reporting obligations, review mechanisms, certification requirements and adaptive management provisions designed to identify unexpected effects at an early stage and implement appropriate management responses where necessary. MBL's position is that monitoring forms an important component of a broader environmental management framework rather than acting as the sole mitigation measure.
WCRB-09	Reliance on alleged Pākiri compliance issues. WCRB refers to historical allegations regarding monitoring and compliance at Pākiri and submits that these matters reduce confidence in MBL's ability to comply with consent conditions.	Planning Team	Environmental Monitoring Management Plan (Attachment 29) – Monitoring and Compliance Framework. Recommended Resource Consent Conditions (Attachment 26) – Monitoring, Reporting and Review Conditions.	The current application has been assessed on its own merits and is supported by a comprehensive suite of technical assessments, management plans and proposed consent conditions specific to Te Ākau/Bream Bay. The proposed consent framework includes extensive monitoring, reporting, review and adaptive management provisions designed to verify environmental performance and ensure compliance throughout the life of the project. The Expert Panel's assessment is focused on the environmental effects, mitigation measures and conditions proposed for the current application.
WCRB-10	Inconsistency with NZCPS, Regional Policy Statement and Proposed Regional Plan. WCRB submits that the proposal is contrary to precautionary, coastal process, natural character, biodiversity and coastal hazard policies within the NZCPS, Northland RPS and Proposed Regional Plan. Significant emphasis is placed on Policy 3 (Precautionary Approach), Policies 24–27 (Coastal Processes), Policy 13 (Natural Character) and associated regional planning provisions.	David Hay; Planning Team	AEE – Statutory Assessment (NZCPS, Regional Policy Statement and Proposed Regional Plan). Assessment of Coastal Process Effects (Attachment 8) – Conclusions (Section 6). R.Reinen-Hamill and E.Beetham's joint statement of evidence dated 12 August 2026.	The application includes a detailed statutory assessment against the New Zealand Coastal Policy Statement, Northland Regional Policy Statement, Proposed Regional Plan and other relevant planning instruments. The assessment evaluates the proposal against relevant provisions relating to coastal processes, biodiversity, natural character, precautionary management and environmental protection. MBL's position is that the proposal is consistent with the relevant statutory framework when considered alongside the proposed mitigation measures, management plans and consent conditions. MBL defer to Mr Reinen-Hamill and Mr Beetham’s joint statement of evidence in relation to Coastal Processes for further context.
WCRB-11	Proposal is inconsistent with the purpose and principles of the RMA. WCRB submits that the proposal fails to promote sustainable management because it creates uncertainty regarding coastal resilience, natural character, biodiversity, amenity values, climate change resilience and future generations' use of coastal resources.	David Hay; Planning Team	AEE – Overall Assessment of Effects and Statutory Assessment.	The application includes a comprehensive assessment of environmental, cultural, social and economic effects together with a detailed statutory evaluation. MBL's position is that the proposal appropriately balances the protection of environmental values with the sustainable management and beneficial use of natural resources. The proposed conditions, management plans and monitoring framework are intended to ensure that adverse effects are appropriately managed while enabling the project to deliver significant regional and national benefits.
18. Langs Beach Society Inc.				
LBS-01	Overall opposition to the proposal due to perceived risks to the marine environment and recreational amenity of Langs Beach and wider Bream Bay. The Society submits that industrial-scale sand extraction is likely to adversely affect the marine environment and recreational values relied upon by residents, visitors and marine users throughout Bream Bay. The Society formally opposes the application.	Planning Team; Relevant Technical Experts	AEE – Overall Assessment of Effects. Assessment of Landscape and Natural Character Effects (Attachment 7) – Assessment of Effects and Conclusions (Sections 8–10 & 12).	The application is supported by a comprehensive suite of specialist assessments addressing coastal processes, benthic ecology, fisheries, water quality, marine mammals, seabirds, recreation, navigation, cultural values and economics. Collectively, these assessments conclude that environmental effects can be appropriately avoided, remedied or mitigated through the proposed consent conditions, management plans and monitoring framework. MBL's position is that the proposal can proceed while maintaining the environmental, recreational and amenity values of Te Ākau/Bream Bay while delivering significant regional and national benefits.
LBS-02	Potential adverse effects on recreational amenity, boating, fishing, diving and marine recreation. The Society notes that Langs Beach is a significant recreational destination and one of the principal launching locations within Bream Bay for recreational boating, fishing, diving, sailing, kayaking and other marine activities. It submits that adverse effects on the marine environment may reduce recreational enjoyment and amenity values.	Brown NZ Ltd; Captain Bruce Goodchild; R.O. Boyd	Assessment of Surf Break Effects (Attachment 17) – Assessment of Effects and Conclusions (Sections 5–7). Assessment of Navigational Safety Effects (Attachment 19) – Risk Assessment and Conclusions (Sections 4–6). R.O. Boyd's statement of evidence dated 12 August 2026.	The application includes assessments of recreation, navigation safety, fisheries, coastal processes and marine ecology. The proposed extraction area is located approximately 4.7 km offshore and operational activities will not occur within areas commonly used for swimming, diving, boating, kayaking, surfing or other recreational activities. The Navigation Safety Assessment concluded that vessel movements associated with the proposal can be safely managed through operational controls and proposed consent conditions. The assessments conclude that significant adverse effects on recreational use and amenity values are unlikely.
LBS-03	Potential adverse effects on recovering marine ecosystems, fisheries and biodiversity. The Society submits that marine habitats, flora and fauna within the extraction area are recovering and that sand extraction may place these values at additional risk. Concerns are raised regarding impacts on fisheries, marine ecology and broader ecosystem health.	Bioresearches Group; R.O. Boyd; NIWA	Assessment of Benthic Ecology Effects (Attachment 12) – Ecological Values and Assessment of Effects (Sections 5–6). Assessment of Fish and Fisheries Effects (Attachment 16) – Potential Sand Dredging Effects and Conclusions (Sections 5–7). R.O. Boyd's statement of evidence dated 12 August 2026.	Detailed investigations of benthic habitats, ecological communities, fisheries resources and marine food web processes were undertaken within and surrounding the extraction area. These assessments evaluated ecological values, habitat recovery, fisheries productivity and ecosystem functioning. The assessments conclude that effects will be largely confined to the extraction footprint, that ecological recovery is expected over time, and that significant adverse population-level effects on fisheries resources and marine biodiversity are unlikely. A comprehensive monitoring programme is proposed to verify environmental performance and ecological recovery throughout operations.
LBS-04	Potential impacts on fishing and diving opportunities. The Society submits that degradation of the marine environment could adversely affect recreational fishing and diving opportunities relied upon by residents and visitors. Concerns are raised regarding marine habitat disturbance and consequent effects on recreational marine users.	R.O. Boyd; Bioresearches Group	Assessment of Fish and Fisheries Effects (Attachment 16) – Potential Sand Dredging Effects and Conclusions (Sections 5–7). Assessment of Navigational Safety Effects (Attachment 19) – Conclusions (Page 13). R.O. Boyd's statement of evidence dated 12 August 2026.	The Fisheries Effects Assessment evaluated potential effects on fish populations, shellfish resources, benthic habitats and marine ecological processes that support recreational fishing and diving values. The assessment concluded that significant adverse population-level effects on fisheries resources are unlikely and that effects will be localised to the extraction footprint. The proposed monitoring framework provides an ongoing mechanism to verify environmental performance and fisheries resource condition throughout the life of the project.
LBS-05	Concerns regarding beach erosion and declining sand levels. The Society submits that members have observed what they perceive to be declining sand levels and dune depletion at Langs Beach over recent decades. The submission draws comparisons with historical Pākiri extraction and perceived changes at Mangawhai Spit, expressing concern that extraction in Bream Bay may contribute to similar outcomes.	Tonkin + Taylor Ltd; Brown NZ Ltd; R.Reinen-Hamill and B.Beetham	Assessment of Coastal Process Effects (Attachment 8) – Sediment Transport Assessment, Coastal Process Effects and Conclusions (Sections 4–7). R.Reinen-Hamill and E.Beetham's joint statement of evidence dated 12 August 2026.	The Coastal Process Effects Assessment incorporated bathymetric surveys, sediment investigations, seabed characterisation and coastal process analysis to assess potential effects on sediment transport, shoreline stability and beach morphology. The assessment concluded that the extraction area is located beyond the depth of closure and outside the active nearshore sediment transport system, such that significant effects on beaches, dunes and shoreline processes at Langs Beach and elsewhere within Bream Bay are not expected. These conclusions are supported by proposed bathymetric monitoring, control area comparisons and adaptive management provisions throughout the life of the project. MBL defer to Mr Reinen-Hamill and Mr Beetham’s joint statement of evidence in relation to Coastal Processes.
LBS-06	No demonstrated need for marine sand extraction and endorsement of BBG evidence. The Society submits that the commercial rationale for marine sand extraction is questionable and that alternative sources may be available to meet demand. The Society expressly endorses the	M.E. Consulting – Lawrence McIlrath; Paul Donoghue; Planning Team	Assessment of Economic Effects (Attachment 18) – Supply Assessment, Demand Outlook and Alternative Supply Considerations (Sections 3–4). Concrete Suitability Statement	The Economic Effects Assessment evaluated future demand for suitable concrete-grade sand, existing supply sources and projected supply constraints across the upper North Island. The assessment concluded that a long-term supply deficit is expected to emerge under projected growth scenarios and that existing consented marine sand resources and alternative sources are unlikely to fully meet future demand. The proposal would contribute

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	research, evidence and conclusions prepared by Bream Bay Guardians in opposition to the application.		(Attachment 20). P.Donoghue's statement of evidence dated 12 August 2026.	to maintaining a secure and diversified supply of construction materials required for housing, infrastructure and economic development. MBL's position regarding economic need is supported by the Economic Effects Assessment and the Concrete Suitability Statement. Additionally, MBL defer to P.Donoghue's statement of evidence on Concrete Suitability.
19. Earth Sciences New Zealand (Crown Research Institute)				
ESNZ-01	Potential effects on the Northland Aquaculture Centre (NAC) seawater intake. ESNZ notes that the NAC at Ruakākā relies on high-quality seawater sourced through an offshore intake approximately 200 m offshore and that water quality is critical to ongoing aquaculture operations. ESNZ sought confirmation that potential effects on seawater quality at the intake had been assessed.	SLR Consulting NZ	Assessment of Water Quality Effects (Attachment 9) – Existing Environment, Sediment Plume Assessment and Assessment of Effects (Sections 4–6). E.Jones statement of evidence dated 12 August 2026.	The Water Quality Effects Assessment specifically considered the potential for sediment plume dispersion and water quality changes to affect sensitive receptors within the wider receiving environment, including the Northland Aquaculture Centre seawater intake. The assessment incorporated plume modelling, suspended sediment analysis and water quality investigations and concluded that the distance between the extraction area and the intake is such that any changes in turbidity or water quality at the intake are expected to be negligible. MBL considers that the technical assessment appropriately addresses this issue and provides confidence that significant adverse effects on aquaculture operations are unlikely. MBL defer to E.Jones statement of evidence on Water Quality.
ESNZ-02	ESNZ accepts the conclusions of the Water Quality Effects Assessment. ESNZ states that, given the distance between the proposed extraction area and the NAC intake, it considers the conclusion reached in the Water Quality Effects Assessment to be reasonable based on the information available. ESNZ notes the assessment's conclusion that turbidity effects at this distance are expected to be negligible.	SLR Consulting NZ	Assessment of Water Quality Effects (Attachment 9) – Assessment of Water Quality Effects and Conclusions (Sections 5–8). E.Jones statement of evidence dated 12 August 2026.	MBL notes ESNZ's acceptance of the Water Quality Effects Assessment conclusions. The assessment evaluated sediment plume generation, suspended sediment concentrations, dispersion characteristics and potential ecological effects associated with extraction activities. The assessment concluded that water quality effects will be temporary, localised and rapidly dissipated within the receiving environment, with negligible effects anticipated at the NAC intake. These conclusions are supported by the proposed monitoring and adaptive management framework proposed in the EMMP (Attachment 29).
ESNZ-03	Request that future reviews of the EMMP be able to consider NAC water quality monitoring data. ESNZ seeks a condition enabling reviews of the Environmental Monitoring Management Plan to take account of ongoing water quality monitoring undertaken at the NAC. ESNZ notes that it continuously monitors incoming seawater quality and considers that any significant changes detected following commencement of extraction activities should be capable of informing future reviews of the monitoring framework.	SLR Consulting NZ; Planning Team	Environmental Monitoring Management Plan (Attachment 29) – Water Quality Monitoring, Reporting and Adaptive. E.Jones statement of evidence dated 12 August 2026. Management Framework. Recommended Resource Consent Conditions (Attachment 26) – Monitoring Review and Adaptive Management Conditions.	The Environmental Monitoring Management Plan has been developed as an adaptive framework capable of incorporating new information and monitoring results over time. MBL agrees that relevant monitoring information collected by third parties may assist in improving understanding of environmental conditions within the wider receiving environment. The proposed review and adaptive management provisions provide a mechanism through which additional monitoring information can be considered where relevant to the ongoing management of environmental effects.
ESNZ-04	Willingness to share monitoring information if consent is granted. ESNZ confirms that it is prepared to provide relevant water quality monitoring information to the consent holder and regulator, subject to appropriate consultation regarding data sharing arrangements and retention of ownership rights over the data.	Planning Team; SLR Consulting NZ	Environmental Monitoring Management Plan (Attachment 29) – Monitoring, Reporting and Review Framework.	MBL welcomes ESNZ's willingness to make relevant monitoring information available, subject to appropriate data-sharing arrangements. The availability of additional monitoring data has the potential to further improve understanding of environmental conditions and complement the monitoring framework proposed for the project. MBL considers that collaboration and information sharing between organisations undertaking environmental monitoring can contribute positively to adaptive management and environmental stewardship outcomes.
20. Bream Bay Guardians				
BBG-01	Need for the project and future aggregate shortages. BBG submits that the application overstates future shortages of suitable sand and aggregate resources. BBG considers that the economic case relies on assumptions regarding population growth, infrastructure demand and future supply constraints that may not eventuate.	M.E. Consulting – Lawrence McIlrath; Paul Donoghue	Assessment of Economic Effects (Attachment 18) – Demand Outlook and Supply Assessment (Sections 3–4). L.McIlrath statement of evidence dated 12 August 2026. P.Donoghue's statement of evidence dated 12 August 2026.	The Assessment of Economic Effects (Attachment 18) identifies forecast supply constraints affecting future aggregate and concrete sand availability within the upper North Island. The assessment concludes that additional supply sources will be required to support projected infrastructure and construction demand. The Concrete Suitability Statement (Attachment 20) also addresses the specific characteristics required for high-strength concrete manufacture and explains why not all aggregate or sand sources are interchangeable. Additionally, MBL defer to P.Donoghue's statement of evidence on Concrete Suitability and L.McIlrath's statement of evidence on Economics.
BBG-02	Alternative aggregate sources have not been adequately assessed. BBG submits that existing and future terrestrial aggregate resources could satisfy projected demand without requiring offshore sand extraction. BBG relies on aggregate opportunity modelling and information relating to potential future quarry developments.	M.E. Consulting – Lawrence McIlrath; Paul Donoghue	Assessment of Economic Effects (Attachment 18) – Supply Assessment and Alternative Supply Considerations (Sections 3–4). Concrete Suitability Statement (Attachment 20). P.Donoghue's statement of evidence dated 12 August 2026.	The Assessment of Economic Effects (Attachment 18) evaluates the availability of existing aggregate resources and identifies forecast supply constraints affecting future construction demand. The Concrete Suitability Statement (Attachment 20) addresses the technical requirements for concrete manufacture and the limitations of alternative sand sources. Together these assessments conclude that additional sources of suitable concrete sand will be required to support future demand. Additionally, MBL defer to P.Donoghue's statement of evidence on Concrete Suitability.
BBG-03	Kings Quarry and other emerging quarry developments may provide sufficient future supply. BBG submits that emerging quarry operations, including Kings Quarry, demonstrate that future aggregate demand can be met without offshore extraction.	M.E. Consulting – Lawrence McIlrath; Paul Donoghue	Assessment of Economic Effects (Attachment 18) – Supply Assessment and Future Supply Constraints (Sections 3–4). Concrete Suitability Statement (Attachment 20). P.Donoghue's statement of evidence dated 12 August 2026.	The economic assessment considers future aggregate supply scenarios and identifies ongoing constraints affecting the availability of suitable concrete-grade sand. Information regarding future quarry production does not, in itself, address issues relating to concrete suitability, reserve life, geographic distribution, transport costs or future demand growth. These matters are considered within Attachments 18 and 20. Additionally, MBL defer to P.Donoghue's statement of evidence on Concrete Suitability.
BBG-04	Manufactured sand is a viable substitute for marine sand. BBG submits that manufactured sand products can be used in place of marine sand and that the proposal is therefore unnecessary.	Paul Donoghue	Concrete Suitability Statement (Attachment 20). Assessment of Economic Effects (Attachment 18) – Alternative Supply Considerations (Section 4). P.Donoghue's statement of evidence dated 12 August 2026.	The Concrete Suitability Statement (Attachment 20) evaluates the specific characteristics required for high-strength concrete production and discusses the limitations associated with alternative sand products. The assessment concludes that marine sand remains an important component of the regional concrete supply chain due to its physical characteristics and suitability for concrete manufacture. Additionally, MBL defer to P.Donoghue's statement of evidence on Concrete Suitability.

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BBG-05	Regional and national economic benefits are overstated. BBG submits that the application places excessive weight on economic benefits while understating environmental risks and uncertainty.	M.E. Consulting – Lawrence McIlrath; Planning Team	Assessment of Economic Effects (Attachment 18) – Conclusion (Section 6). L.McIlrath statement of evidence dated 12 August 2026.	The Assessment of Economic Effects (Attachment 18) considers the proposal's contribution to infrastructure delivery, construction supply chains and future aggregate availability. The assessment identifies both regional and national benefits arising from increased supply resilience. Environmental effects are separately assessed through the specialist technical assessments accompanying the application.
BBG-06	Private benefits outweigh public benefits. BBG submits that the proposal primarily benefits MBL and associated industries rather than providing broader public benefit.	M.E. Consulting – Lawrence McIlrath; Planning Team	Assessment of Economic Effects (Attachment 18) –Avoided Costs and Benefits (Section 4).	The Assessment of Economic Effects (Attachment 18) concludes that the proposal provides benefits extending beyond MBL through increased aggregate supply, support for infrastructure projects, improved supply resilience and reduced future supply constraints affecting the wider construction sector.
BBG-07	Depth of Closure methodology is unreliable. BBG's coastal expert submits that the methodology used to identify the depth of closure may underestimate the extent of active sediment transport processes and therefore overstate confidence regarding coastal effects.	Tonkin + Taylor Ltd – Eddie Beetham, R. Reinen-Hamill and G. Nicholson	Assessment of Coastal Process Effects (Attachment 8) – Sediment Transport Assessment and Coastal Process Effects (Sections 4–6). R.Reinen-Hamill and E.Beetham's joint statement of evidence dated 12 August 2026.	The Assessment of Coastal Process Effects (Attachment 8) specifically evaluates the depth of closure and depth of transport using accepted coastal engineering methodologies. The assessment concludes that the extraction area is located beyond the active nearshore sediment transport zone and that effects on beaches, dunes and surf breaks are expected to be negligible. Richard Reinen-Hamill and Edward Beetham conclude that the proposed extraction area is located beyond the active shoreface and depth of sediment exchange, meaning there is no credible mechanism by which dredging would cause measurable beach erosion or coastal instability. They further conclude that the coastal processes assessment is supported by multiple lines of evidence, and that any residual uncertainty will be appropriately managed through enhanced monitoring, adaptive management and revised consent conditions.
BBG-08	Sediment transport pathways are not sufficiently understood. BBG submits that insufficient information exists regarding offshore sediment transport pathways and sediment exchange processes to confidently exclude long-term coastal effects.	Tonkin + Taylor Ltd – Eddie Beetham, R. Reinen-Hamill and G. Nicholson	Assessment of Coastal Process Effects (Attachment 8) – Sediment Transport Assessment (Sections 4–6). R.Reinen-Hamill and E.Beetham's joint statement of evidence dated 12 August 2026.	The Assessment of Coastal Process Effects (Attachment 8) evaluates bathymetry, sediment characteristics, depth of closure and sediment transport processes within Te Ākau Bream Bay. The assessment concludes that the proposed extraction area is sufficiently offshore that extraction is not expected to materially affect sediment supply to beaches, dunes or surf breaks. MBL defer to Mr Reinen-Hamill and Mr Beetham's joint statement of evidence in relation to Coastal Processes for further context.
BBG-09	Climate change and cumulative effects have not been adequately assessed. BBG submits that the application does not sufficiently account for long-term climate change effects, including sea level rise, changing storm patterns and cumulative impacts on coastal processes over the proposed 35-year consent duration. BBG considers a more precautionary assessment is required given uncertainty regarding future coastal conditions.	Tonkin + Taylor Ltd – Eddie Beetham, R. Reinen-Hamill and G. Nicholson; Osborne Hay / Planning Team	Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects and Conclusions (Sections 5–7). AEE – Cumulative Effects Assessment.	The Assessment of Coastal Process Effects (Attachment 8) considers climate change, natural hazards and cumulative effects as part of the coastal process assessment. The assessment concludes that the proposed extraction area is located sufficiently offshore that the activity is unlikely to materially influence coastal responses to climate change, sea level rise or shoreline evolution.
BBG-10	Potential beach erosion and shoreline instability. BBG submits that offshore extraction may contribute to beach erosion, reduced sediment supply and long-term shoreline instability. BBG considers that uncertainty regarding offshore sediment transport processes means adverse coastal effects cannot be confidently excluded.	Tonkin + Taylor Ltd – Eddie Beetham, R. Reinen-Hamill and G. Nicholson	Assessment of Coastal Process Effects (Attachment 8) – Coastal Process Effects and Conclusions (Sections 5–7). R.Reinen-Hamill and E.Beetham's joint statement of evidence dated 12 August 2026.	The Assessment of Coastal Process Effects (Attachment 8) concludes that the extraction area is located beyond the active sediment transport zone and that effects on beaches, dunes and shoreline stability are expected to be negligible. These conclusions are supported by bathymetric analysis, sediment investigations and coastal process assessment. MBL defer to Mr Reinen-Hamill and Mr Beetham's joint statement of evidence in relation to Coastal Processes.
BBG-11	Removal of a finite relict sediment resource. BBG submits that the sand resource represents a finite relict deposit that plays an important role in the wider coastal sediment system. BBG argues that removal of this resource may have consequences that extend beyond the extraction footprint and consent duration.	Tonkin + Taylor Ltd – Eddie Beetham, R. Reinen-Hamill and G. Nicholson	Assessment of Coastal Process Effects (Attachment 8) – Conclusions (Section 7). Assessment of Economic Effects (Attachment 18) – Sand Market and Outlook (Sections 3).	The Assessment of Coastal Process Effects (Attachment 8) considers the origin, characteristics and role of offshore sediment deposits within the wider coastal environment. The assessment concludes that extraction from the proposed area is not expected to materially affect coastal sediment supply processes or result in measurable effects on beaches and dunes.
BBG-12	Pakiri trench precedent demonstrates uncertainty regarding extraction effects. BBG relies on historic Pakiri extraction experiences, including trench formation and subsequent concerns regarding seabed recovery, to argue that similar issues could arise in Te Ākau Bream Bay. BBG submits that confidence in extraction methodologies may be overstated.	Tonkin + Taylor Ltd – Eddie Beetham, R. Reinen-Hamill and G. Nicholson; Osborne Hay / Planning Team	Environmental Monitoring Management Plan (Attachment 29) – Monitoring and Adaptive Management Framework. Recommended Resource Consent Conditions (Attachment 26).	The proposed extraction methodology differs from historical extraction scenarios relied upon by BBG and is supported by detailed operational controls, monitoring requirements and adaptive management provisions. The SEOP, EMMP and proposed consent conditions provide mechanisms to monitor extraction effects and respond to any unexpected changes in seabed morphology.
BBG-13	Scallop recovery and fisheries productivity may be adversely affected. BBG submits that extraction activities could affect scallop populations, shellfish recruitment and broader fisheries values. BBG considers that existing ecological pressures within the wider region increase the importance of avoiding additional disturbance.	R.O. Boyd; Bioresearches – Simon West and Dylan van Winkel	Assessment of Fish and Fisheries Effects (Attachment 16) – Potential Sand Dredging Effects and Conclusions (Sections 5–7). R.O. Boyd's statement of evidence dated 12 August 2026.	The Assessment of Fish and Fisheries Effects (Attachment 16) and Assessment of Benthic Ecology Effects (Attachment 12) evaluate potential effects on fish, shellfish and benthic communities. The assessments conclude that effects are expected to be localised to the extraction footprint and are unlikely to result in population-level effects on fisheries resources.
BBG-14	Food-web and ecosystem effects may be understated. BBG submits that indirect ecological effects on prey species, benthic productivity and ecosystem functioning may be more significant than recognised in the application. BBG argues that higher trophic level effects on fish, seabirds and marine mammals cannot be confidently excluded.	Bioresearches – Simon West and Dylan van Winkel; R.O. Boyd; NIWA; SLR Consulting NZ	Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–9). D.Thompson's statement of evidence dated 12 August 2026. S.West's statement of evidence dated 12 August 2026. H.McConnell's statement of evidence dated 12 August 2026	The ecological assessments collectively consider food-web interactions, benthic productivity, fisheries resources and higher trophic level species. The assessments conclude that changes to prey availability are expected to be minor, localised and unlikely to result in measurable effects on seabird, fish or marine mammal populations. MBL defer to D.Thompson, S.West and H.McConnell's statements of evidence for further context.
BBG-15	Marine mammal effects may be greater than predicted. BBG submits that Te Ākau Bream Bay provides important habitat for marine mammals and that behavioural disturbance, habitat displacement and cumulative effects may be underestimated.	SLR Consulting NZ – Helen McConnell; Styles Group	Assessment of Underwater Noise Effects (Attachment 11) - Results (Section 5). Assessment of Marine Mammal Effects (Attachment 14) – Environmental Impact Assessment and Conclusions (Sections 4–6). Marine Mammal Management Plan (Attachment 28). H.McConnell's statement of evidence dated 12 August 2026	The Marine Mammal Environmental Impact Assessment (Attachment 14) and Assessment of Underwater Noise Effects (Attachment 11) conclude that marine mammal effects are expected to be localised, temporary and unlikely to result in population-level impacts. The Marine Mammal Management Plan (Attachment 28) provides mitigation, monitoring and reporting requirements to manage potential effects. MBL defer to H. McConnell's statement of evidence on Marine Mammals.

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BBG-16	Seabird and shorebird effects may be understated. BBG submits that extraction activities may affect foraging habitat, prey availability and habitat use by seabirds and shorebirds. BBG considers the significance of Te Ākau Bream Bay for seabird species may be greater than recognised.	NIWA – David Thompson	Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects (Sections 4–5). D.Thompson's statement of evidence dated 12 August 2026.	The Assessment of Seabirds and Shorebirds Effects (Attachment 13) evaluates species occurrence, habitat use, prey availability, disturbance and vessel interactions. The assessment concludes that effects are expected to be localised and unlikely to adversely affect seabird populations due to the limited footprint and temporary nature of extraction activities. Dr David Thompson concludes that the proposed sand extraction will have minor to negligible effects on seabirds and shorebirds, including tara iti, because breeding habitat, prey availability and coastal processes will remain largely unaffected. He finds that any effects from turbidity, underwater noise, vessel activity, lighting and cumulative pressures are localised, temporary and unlikely to affect populations or long-term ecological function.
BBG-17	Cup coral habitat may be more extensive and significant than identified in the application. BBG submits that protected stony coral species may be more widespread within the extraction area and surrounding environment than current survey information suggests. BBG considers that uncertainty regarding the distribution of cup corals warrants a more precautionary approach.	NIWA – Dr Jenny Beaumont, Dr Owen Anderson and Dr Sadie Mills	Assessment of Scleractinian Cup Coral Effects (Attachment 21) – Effects Assessment and Conclusions (Sections 4–5). Cup Coral Management Plan (Attachment 30). J.Beaumont's statement of evidence dated 12 August 2026.	The Assessment of Scleractinian Cup Corals Effects (Attachment 21) includes a dedicated investigation into the occurrence, distribution and ecological significance of cup corals within and around the proposed extraction area. The assessment concludes that while cup corals occur within the wider region, the proposed management framework, avoidance measures and monitoring programme provide an appropriate basis for managing potential effects. MBL also defer to J.Beaumont's statements of evidence in relation to the assessed ecological significance of cup corals and finds that the strengthened Cup Coral Management Plan, improved survey methods and adaptive management framework provide robust protection for cup corals throughout the life of the project.
BBG-18	Cup coral monitoring programme may not be capable of detecting rare or sparsely distributed coral populations. BBG relies on commentary from previous marine sand extraction projects and submits that monitoring approaches may fail to identify low-density coral populations until after adverse effects have occurred.	NIWA – Dr Jenny Beaumont, Dr Owen Anderson and Dr Sadie Mills; Bioresearches	Cup Coral Management Plan (Attachment 30). Recommended Wildlife Approval Conditions (Attachment 35).	The application includes a dedicated Cup Coral Management Plan supported by proposed wildlife approval conditions. The monitoring and management framework has been specifically developed to identify, manage and respond to potential coral-related issues through pre-extraction surveys, monitoring and adaptive management provisions.
BBG-19	Historic Pakiri coral compliance issues demonstrate weaknesses in monitoring and management systems. BBG refers to historic coral discoveries associated with the Pakiri marine sand operation and submits that similar issues could arise at Te Ākau Bream Bay. BBG considers that lessons from Pakiri demonstrate the need for a more precautionary approach.	NIWA; Osborne Hay / Planning Team	Cup Coral Management Plan (Attachment 30). Recommended Wildlife Approval Conditions (Attachment 35). S.Elstob's statement of evidence dated 12 August 2026.	The proposed consent framework differs significantly from historic arrangements relied upon by BBG. The application includes a dedicated coral assessment, a specific Cup Coral Management Plan, wildlife approval conditions and comprehensive monitoring requirements designed to identify and manage coral-related risks. MBL defers to Mr Elstob's statement of evidence.
BBG-20	Statistical confidence and detection capability may be insufficient to identify ecological change. BBG submits that monitoring programmes may lack sufficient statistical power to detect ecological effects, particularly where species are rare, naturally variable or patchily distributed.	NIWA; Bioresearches	Environmental Monitoring Management Plan (Attachment 29) – Monitoring Design and Adaptive Management Framework.	The monitoring framework has been developed to assess ecological conditions before, during and after extraction. Monitoring requirements are supported by reporting, review and adaptive management provisions that enable management responses if monitoring identifies unexpected effects.
BBG-21	Historic heritage values have not been adequately assessed. BBG submits that the application does not contain a comprehensive assessment of historic heritage values associated with the project area and wider coastal environment. BBG considers that further assessment is required before consent could be granted.	Osborne Hay / Planning Team; D.Hay	D.Hay statement of evidence dated 12 August 2026. AEE – Existing Environment and Effects Assessment.	The application assesses environmental, cultural and landscape values associated with the proposal. BBG's concerns primarily relate to whether additional specialist heritage assessment is required. This matter can be further considered through planning evidence and any additional heritage advice considered necessary. MBL refers to D.Hay's statement of evidence (paragraph 64).
BBG-22	No dedicated maritime archaeological assessment has been undertaken. BBG submits that the seabed may contain unidentified archaeological material, including shipwrecks and other submerged cultural heritage resources, and that these matters have not been adequately investigated.	Osborne Hay / Planning Team; D.Day	AEE – Existing Environment and Statutory Assessment. D.Hay statement of evidence dated 12 August 2026.	BBG raises concerns regarding the absence of a dedicated maritime archaeological assessment. The planning evidence and consent framework can address whether additional heritage investigations or management measures are warranted having regard to the nature of the activity and the receiving environment. MBL refers to D.Hay's statement of evidence (paragraph 64).
BBG-23	Heritage New Zealand consultation and archaeological database searches have not been sufficiently addressed. BBG submits that further consultation and investigation should have been undertaken to identify potential archaeological constraints affecting the proposal.	Osborne Hay / Planning Team; D.Hay	AEE – Consultation and Engagement. D.Hay statement of evidence dated 12 August 2026.	BBG's concerns relate primarily to process and information gathering. The planning assessment can address the extent of investigations undertaken, the relevance of heritage considerations to the proposal and whether any additional management measures are appropriate. MBL refers to D.Hay's statement of evidence (paragraph 64).
BBG-24	Reliance on monitoring and adaptive management is inappropriate where uncertainty remains. BBG submits that adaptive management should not be relied upon to address uncertainty regarding ecological and coastal effects. BBG considers that all significant uncertainties should be resolved before consent is granted.	Osborne Hay / Planning Team; Relevant Technical Experts	Environmental Monitoring Management Plan (Attachment 29) – Adaptive Management Framework. Recommended Resource Consent Conditions (Attachment 26).	The application adopts a precautionary approach through extensive baseline investigations, monitoring requirements, management plans and consent conditions. Adaptive management is proposed as an additional safeguard to enable management responses should monitoring identify effects that differ from those predicted.
BBG-25	A precautionary approach should be adopted due to remaining uncertainty. BBG submits that uncertainties relating to coastal processes, ecology, fisheries, marine mammals, seabirds, cup corals and cultural values justify refusal of consent or the imposition of significantly more restrictive controls.	All Technical Experts; Osborne Hay / Planning Team; D.Thompson; R.O.Byod; J.Beaumont	AEE – Statutory Assessment. Assessment of Coastal Process Effects (Attachment 8) – Assessment effects on Coastal Processes (Section 5). D.Thompson's statement of evidence dated 12 August 2026. R.O. Boyd's statement of evidence dated 12 August 2026. J.Beaumont's statement of evidence dated 12 August 2026.	The application includes a comprehensive suite of technical assessments prepared by specialist experts across coastal processes, ecology, fisheries, marine mammals, seabirds, cultural values and economics. These assessments conclude that effects will generally be localised, temporary and capable of being appropriately managed through the proposed consent conditions, monitoring programmes and management plans. MBL refers to the statement of evidence issued by D.Thompson, R.O.Boyd and J.Beaumont.
BBG-26	Water quality and suspended sediment effects may be underestimated. BBG submits that dredging and overflow activities may result in elevated suspended sediment concentrations, reduced water clarity and adverse effects on marine ecosystems beyond the	SLR Consulting NZ – Water Quality Team; E.Jones	Assessment of Water Quality Effects (Attachment 9) – Assessment of Effects and Conclusions (Sections 5–7). E.Jones statement of evidence dated 12 August 2026.	The Assessment of Water Quality Effects (Attachment 9) includes detailed modelling of suspended sediment plumes, deposition and water quality changes associated with extraction activities. The assessment concludes that effects will be localised, temporary and unlikely to result in significant adverse ecological effects beyond the

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	extraction area. BBG considers that modelling uncertainty means wider effects cannot be excluded.			immediate extraction area. Monitoring and management requirements are proposed through the EMMP. MBL defer to E.Jones statement of evidence on Water Quality.
BBG-27	Underwater noise effects may affect marine fauna. BBG submits that dredging operations, vessel activity and associated underwater noise may affect marine mammals, fish and other marine species. BBG considers that cumulative effects from existing maritime activity should also be considered.	Styles Group – Acoustic Specialists; SLR Consulting NZ; M.Pine	Assessment of Underwater Noise Effects (Attachment 11) – Assessment of Effects and Conclusions (Sections 5–8). Marine Mammal Management Plan (Attachment 28). M.Pine's statement of evidence dated 12 August 2026.	The Assessment of Underwater Noise Effects (Attachment 11) evaluates predicted sound levels associated with the proposed activity and concludes that effects are expected to be temporary, localised and within accepted thresholds. Marine mammal mitigation measures are incorporated through the Marine Mammal Management Plan. Additionally, MBL defer to M.Pine's statement of evidence on underwater acoustics.
BBG-28	Potential effects on surf breaks and recreational coastal values. BBG submits that changes to offshore bathymetry may affect wave propagation, surf quality and recreational use of beaches within Te Ākau Bream Bay.	MetOcean Solutions – Dr Tom Gorman; B.Beamsley	Assessment of Surf Break Effects (Attachment 17) – Assessment of Effects and Conclusions (Sections 5–7). B.Beamsley statement of evidence dated 12 August 2026.	The Assessment of Surf Breaks Effects (Attachment 17) evaluates wave transformation, surf quality and recreational surf values. The assessment concludes that changes to surf break characteristics are expected to be negligible due to the location, scale and depth of the proposed extraction area. Dr Brett Beamsley that modelling shows the proposed extraction will have negligible to imperceptible effects on surf breaks, wave conditions and recreational wave amenity throughout Te Ākau Bream Bay. He finds the concerns raised by submitters are not supported by the modelling evidence.
BBG-29	Navigation safety and vessel movements. BBG submits that extraction vessels may increase navigational risk for recreational users, fishing vessels and other maritime traffic within Te Ākau Bream Bay.	Captain Bruce Goodchild	Assessment of Navigational Safety Effects (Attachment 19) – Conclusions (Pag 13).	The Navigation Safety Assessment (Attachment 19) considers vessel movements, shipping routes, recreational users and operational safety requirements. The assessment concludes that navigation effects can be appropriately managed through standard maritime procedures, communication protocols and proposed consent conditions.
BBG-30	Tangata whenua concerns and cultural effects. BBG relies on concerns raised by tangata whenua groups regarding cultural values, mana moana, customary relationships and potential effects on cultural health indicators.	Cultural Advisors; Osborne Hay / Planning Team	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22). Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A). C.McCallum's statement of evidence dated 12 August 2026	The application includes multiple cultural assessments and extensive engagement with tangata whenua groups. Cultural values, customary relationships and potential effects on cultural health have been specifically assessed and have informed the proposed management framework and consent conditions.
BBG-31	Fast-track statutory purpose and public interest considerations. BBG submits that the proposal does not satisfy the purpose of the Fast-track Approvals Act and that environmental risks outweigh the claimed economic and infrastructure benefits.	Osborne Hay / Planning Team; M.E. Consulting	AEE – Fast-track Approvals Act Assessment and Statutory Assessment. L.McIlrath statement of evidence dated 12 August 2026.	The application addresses the statutory purpose of the Fast-track Approvals Act and identifies the project's contribution to infrastructure supply chains, regional development and future aggregate security. Environmental effects have been assessed through a comprehensive suite of specialist reports and are proposed to be managed through conditions and management plans.
BBG-32	Cumulative effects with other coastal and marine activities. BBG submits that the proposal should be assessed together with other existing and future activities in the region, including port activities, shipping, fisheries pressures, coastal development and climate change.	Tonkin + Taylor; Planning Team; Relevant Technical Experts	AEE – Cumulative Effects Assessment. Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects (Sections 5–6).	Cumulative effects are considered within the specialist technical assessments and the overall Assessment of Effects on the Environment. The assessments conclude that, having regard to the scale, location and nature of the proposal, cumulative effects are unlikely to result in significant adverse environmental outcomes.
21. Northland Conservation Board (Te Rūnanga Papa Atawhai o Te Tai Tokerau)				
NCB-01	Regional economic and social benefits have not been adequately demonstrated. NCB submits that the application fails to clearly establish that the project will provide sufficient regional economic and social benefits and requests measurable benefit outcomes if consent is granted.	M.E. Consulting – Lawrence McIlrath; Planning Team	Assessment of Economic Effects (Attachment 18) . Market Outlook and Avoided Costs and Benefits (Section 3-4). L.McIlrath statement of evidence dated 12 August 2026.	The Economic Effects Assessment evaluated future demand for concrete-grade sand, supply constraints, construction sector requirements and the role of marine sand in supporting housing and infrastructure delivery across the upper North Island. The assessment concluded that the proposal would contribute to addressing an emerging long-term supply deficit and provide significant regional and national benefits through supporting economic development, construction activity and infrastructure investment. MBL considers that these benefits have been comprehensively assessed and can be monitored through standard reporting and review mechanisms if required.
NCB-02	Need for the proposal and alternative sand sources have not been adequately demonstrated. NCB submits that the application has not sufficiently demonstrated future demand for marine sand or that alternative sources cannot meet future needs.	M.E. Consulting; Paul Donoghue	Assessment of Economic Effects (Attachment 18) – Supply Assessment, Demand Outlook and Alternative Supply Considerations (Sections 3–4). Concrete Suitability Statement (Attachment 20). P.Donoghue's statement of evidence dated 12 August 2026.	The Economic Effects Assessment and Concrete Suitability Statement considered existing marine sand supplies, terrestrial quarries, manufactured sand and other alternative sources. The assessments concluded that alternative sources alone are unlikely to meet projected future demand and that suitable marine sand remains an important component of the construction materials supply chain. The proposal would contribute to maintaining a secure and diversified supply of concrete-grade sand required for future growth and infrastructure development. Additionally, MBL defer to P.Donoghue's statement of evidence on Concrete Suitability.
NCB-03	Potential mortality and disturbance of protected cup corals. NCB submits that significant uncertainty remains regarding cup coral populations, mortality, recovery and population-level effects. NCB opposes the granting of a wildlife approval unless adverse effects can be adequately demonstrated to be acceptable.	NIWA; J.Beaumont	Assessment of Scleractinian Cup Coral Effects (Attachment 21) – Effects Assessment and Conclusions (Sections 4–5). Cup Coral Management Plan (Attachment 30). Recommended Wildlife Approval Conditions (Attachment 35). J.Beaumont's statement of evidence dated 12 August 2026.	The application includes dedicated investigations into the distribution, abundance, ecology and recovery potential of protected cup coral species within and surrounding the extraction area. The Cup Coral Assessment evaluated potential mortality, recovery processes, population resilience and population-level effects. The assessment concluded that while direct effects may occur within the extraction footprint, population-level effects on cup corals are unlikely. These findings are supported by the Cup Coral Management Plan, monitoring requirements and proposed Wildlife Approval Conditions specifically developed to manage effects on protected corals. MBL also defer to J.Beaumont’s statements of evidence in relation to the assessed ecological significance of cup corals. Concluding that the strengthened Cup Coral Management Plan, improved survey methods and adaptive management framework provide robust protection for cup corals throughout the life of the project.
NCB-04	Wildlife approval should be substantially shorter and subject to review. NCB submits that any wildlife approval should be limited to a short duration (preferably 3–10 years) due to uncertainty regarding coral recovery and ecological effects.	NIWA; Planning Team	Recommended Wildlife Approval Conditions (Attachment 35). Cup Coral Management Plan (Attachment 30).	The proposed Wildlife Approval framework incorporates comprehensive monitoring, reporting, review and adaptive management provisions. The duration of any wildlife approval is ultimately a matter for determination by the decision-maker having regard to the evidence, proposed management framework and statutory considerations. MBL considers that the proposed monitoring and review mechanisms provide an appropriate framework for ongoing management of protected wildlife effects throughout the life of the project.
NCB-05	Uncertainty regarding coastal process modelling and potential effects on beaches and dunes. NCB submits that significant uncertainty remains regarding coastal processes, sediment transport,	Tonkin + Taylor Ltd; R.Reinen-Hamill and B.Beetham	Assessment of Coastal Process Effects (Attachment 8) – Sediment Transport Assessment, Coastal Process Effects and	The Coastal Process Effects Assessment incorporated bathymetric surveys, sediment investigations, seabed characterisation and coastal process analysis to evaluate potential effects on sediment transport pathways, shoreline stability, beach morphology and dune systems. The assessment concluded that the extraction area is

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	beach erosion and dune stability. NCB seeks refusal if a high level of confidence cannot be demonstrated.		Conclusions (Sections 4–7). R.Reinen-Hamill and E.Beetham’s joint statement of evidence dated 12 August 2026.	located beyond the depth of closure and outside the active nearshore sediment transport system, such that significant effects on beaches, dunes and coastal landforms are not expected. These conclusions are supported by proposed bathymetric monitoring, control area comparisons and adaptive management provisions throughout the life of the project. MBL defer to Mr Reinen-Hamill and Mr Beetham’s joint statement of evidence in relation to Coastal Processes.
NCB-06	Potential effects on climate resilience and coastal adaptation. NCB submits that uncertainty regarding sediment processes creates uncertainty regarding the future resilience of beaches and dunes to sea-level rise and climate change.	Tonkin + Taylor Ltd; Planning Team	Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects and Conclusions (Sections 5–7).	The Coastal Process Effects Assessment considered long-term coastal processes and the role of sediment systems in maintaining shoreline stability and resilience. The assessment concluded that the proposed extraction activity is unlikely to materially affect the functioning of nearshore sediment transport systems or reduce the resilience of beaches and dunes to future coastal change. Accordingly, significant adverse effects on climate adaptation and coastal resilience are not anticipated.
NCB-07	Potential adverse effects on tara iti (New Zealand Fairy Tern). NCB submits that uncertainty regarding coastal processes and ecological effects creates an unacceptable risk to tara iti and other threatened species. It seeks monitoring and operational triggers if consent is granted.	NIWA – D.Thompson; R.Reinen-Hamill and B.Beetham	Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects (Sections 4–5). Environmental Monitoring Management Plan (Attachment 29) – Monitoring and Adaptive Management Framework. D.Thompson's statement of evidence dated 12 August 2026. R.Reinen-Hamill and E.Beetham's joint statement of evidence dated 12 August 2026.	The Seabirds and Shorebirds Assessment specifically evaluated the distribution, habitat use, feeding ecology and potential exposure pathways for tara iti and other threatened bird species. The assessment considered prey availability, habitat connectivity, vessel activity and indirect ecological pathways and concluded that significant adverse population-level effects are unlikely. Proposed Wildlife Approval Conditions and monitoring requirements provide additional safeguards for tara iti and other protected species. Dr David Thompson concludes that the proposed sand extraction will have minor to negligible effects on seabirds and shorebirds, including tara iti, because breeding habitat, prey availability and coastal processes will remain largely unaffected. He finds that any effects from turbidity, underwater noise, vessel activity, lighting and cumulative pressures are localised, temporary and unlikely to affect populations or long-term ecological function.
NCB-08	Potential effects on other threatened and at-risk species. NCB refers to Caspian tern, banded dotterel, shore skink, katipō, northern NZ dotterel, variable oystercatcher, NZ pipit, white-fronted tern, red-billed gull, pīngao and sand coprosma.	NIWA; Brown NZ Ltd; D.Thompson	Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects (Sections 4–5). Assessment of Benthic Ecology Effects (Attachment 12) – Ecological Values and Assessment of Effects (Sections 5–6). D.Thompson’s statement of evidence dated 12 August 2026.	Specialist assessments considered a broad range of threatened and at-risk species including seabirds, shorebirds, marine mammals and protected marine fauna. The assessments evaluated habitat use, ecological requirements, exposure pathways and potential operational effects. Collectively, the assessments concluded that significant adverse population-level effects on threatened species are unlikely and that proposed management plans and wildlife approval conditions provide an appropriate framework for avoiding, remedying or mitigating effects. MBL defer to D.Thompson's statement of evidence for further context.
NCB-09	Potential impacts on scallop recovery and the SCA 1 fishery. NCB submits that dredging may cause mortality of adult, juvenile and spawning scallops and undermine scallop recovery efforts within the closed fishery area.	R.O. Boyd; Bioresearches Group	Assessment of Fish and Fisheries Effects (Attachment 16) – Potential Sand Dredging Effects and Conclusions (Sections 5–7). R.O. Boyd's statement of evidence dated 12 August 2026.	The Fisheries Effects Assessment and Benthic Ecology Assessment specifically considered scallop populations, habitat availability, recovery processes and fisheries productivity. The assessments concluded that while localised disturbance will occur within the extraction footprint, significant adverse effects on wider scallop populations and recovery efforts are unlikely. Monitoring of benthic communities and fisheries resources is proposed to verify ecological recovery and inform adaptive management where necessary.
NCB-10	Excessive reliance on modelling, assumptions and adaptive management. NCB submits that the application relies too heavily on predictive modelling, future monitoring and adaptive management rather than demonstrating environmental effects with sufficient certainty.	Planning Team; Relevant Technical Experts	Environmental Monitoring Management Plan (Attachment 29) – Adaptive Management Framework. Recommended Resource Consent Conditions (Attachment 26) – Monitoring, Review and Adaptive Management Conditions.	The application is supported by multiple lines of evidence including field investigations, benthic surveys, fisheries assessments, sediment sampling, bathymetric surveys, ecological studies and specialist technical analysis. Monitoring and adaptive management measures are proposed as additional safeguards to verify environmental performance and provide a mechanism for responding to unforeseen effects, rather than as a substitute for assessment. MBL considers that the proposal has been supported by a robust evidential foundation across all key environmental disciplines.
NCB-11	Cumulative effects have not been adequately assessed. NCB submits that cumulative effects should be assessed alongside climate change, fisheries depletion, coastal erosion, sea-level rise and other pressures affecting Bream Bay.	Planning Team; Relevant Technical Experts	AEE – Cumulative Effects Assessment. Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects (Sections 5–6).	The application includes consideration of cumulative effects across coastal processes, benthic ecology, fisheries, marine mammals, seabirds and water quality. Existing and reasonably foreseeable activities within the wider marine environment were considered where relevant. The assessments concluded that cumulative effects are unlikely to result in significant adverse environmental outcomes and that the proposed monitoring framework provides an ongoing mechanism to verify environmental performance over time.
NCB-12	Consent duration should be substantially shorter with mandatory review periods. NCB submits that uncertainty regarding environmental effects makes a long-duration consent inappropriate and seeks shorter consent durations with mandatory review triggers.	Planning Team	Recommended Resource Consent Conditions (Attachment 26) – Review Conditions and Adaptive Management Framework.	The proposed consent framework includes extensive monitoring, reporting, review and adaptive management provisions designed to verify environmental performance throughout the life of the project. The appropriate duration of any consent is ultimately a matter for the decision-maker. MBL's position is that the proposed conditions provide a robust mechanism for ongoing review and management of environmental effects regardless of the consent duration ultimately adopted.
NCB-13	Navigation safety effects have not been adequately assessed. NCB raises concerns regarding vessel movements, navigation risks, hydrographic reliability, bathymetric change and operations near shipping routes to and from Marsden Point.	Captain Bruce Goodchild	Assessment of Navigational Safety Effects (Attachment 19) – Conclusion (Page 13)	A dedicated Navigation Safety Assessment evaluated vessel movements, shipping activity, navigational risk, maritime operations and interactions with existing users of the marine environment. The assessment concluded that navigation risks can be appropriately managed through operational controls, communication procedures and proposed consent conditions. Maritime New Zealand and relevant stakeholders were consulted during preparation of the assessment.
NCB-14	Potential vessel strike and disturbance effects on marine mammals. NCB submits that vessel traffic associated with dredging operations may increase collision risks and affect marine mammal movements, particularly during night-time operations.	SLR Consulting NZ; Styles Group	Assessment of Marine Mammal Effects (Attachment 14) – Environmental Impact Assessment and Conclusions (Sections 4–6). Marine Mammal Management Plan (Attachment 28). H.McConnell's statement of evidence dated 12 August 2026	The Marine Mammal Effects Assessment evaluated species occurrence, habitat use, behavioural responses, vessel activity and potential collision risk associated with extraction operations. The assessment concluded that significant adverse population-level effects on marine mammals are unlikely. The findings are supported by the Marine Mammal Management Plan, operational protocols, monitoring requirements and proposed Wildlife Approval Conditions designed to minimise potential interactions between vessels and marine mammals. MBL defer to H. McConnell's statement of evidence on Marine Mammals.
22. Northport Limited				
NP-01	Northport broadly supports the Navigation Safety Assessment and agrees that the proposal will not create navigational safety issues. Northport reviewed the Assessment of Navigational Safety Effects and agrees with the Harbourmaster's conclusion that the proposal complies with maritime safety requirements and is not expected to	Captain Bruce Goodchild	Assessment of Navigational Safety Effects (Attachment 19).	Northport's comments support the conclusions of the Navigation Safety Assessment that the proposed extraction activity can operate safely within Bream Bay and alongside existing commercial and recreational maritime activities.

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	create navigational safety issues for other users of Bream Bay, including commercial shipping associated with Marsden Point.			
NP-02	Navigation safety guidelines should be reflected in consent conditions. Northport supports the navigation safety guidelines referenced by the Harbourmaster and recommends that these requirements be incorporated into appropriately framed consent conditions if approvals are granted.	Captain Bruce Goodchild; Planning Team	Recommended Resource Consent Conditions (Attachment 26) – Navigation Safety and Maritime Communication Conditions. Assessment of Navigational Safety Effects (Attachment 19).	The application already includes navigation-related management measures and proposed consent conditions designed to ensure safe vessel operations and coordination with other maritime users.
NP-03	Potential sedimentation effects within the Whangārei Harbour commercial shipping channel should be monitored. Northport notes that its interest extends to ensuring that sedimentation resulting from the proposal does not reduce navigable depths within the commercial shipping channel serving Marsden Point. Northport seeks monitoring and management responses if sedimentation effects are identified.	Tonkin + Taylor Ltd; Captain Bruce Goodchild	Assessment of Coastal Process Effects (Attachment 8) – Sediment Transport Assessment and Assessment of Coastal Process Effects (Sections 4–6). Environmental Monitoring Management Plan (Attachment 29) – Monitoring and Reporting Framework.	The Coastal Process Assessment concludes that the extraction activity is not expected to materially alter sediment transport processes or create adverse effects within the Whangārei Harbour shipping channel. Monitoring provisions are proposed through the consent framework.
NP-04	Northport considers navigation and shipping effects can be appropriately managed. Subject to appropriate monitoring and conditions, Northport concludes that the proposed activity can be managed from a navigational safety perspective and makes no wider comment on the application.	Captain Bruce Goodchild; Planning Team	Assessment of Navigational Safety Effects (Attachment 19). Recommended Resource Consent Conditions (Attachment 26) – Navigation Safety Conditions.	Northport's comments support MBL's position that navigational safety effects can be appropriately managed through operational controls, monitoring and consent conditions.
23. Te Kauika o Patuharakeke Waka Ama Incorporated				
TKPWA-01	Overall opposition to the proposal because it is considered inconsistent with the club's relationship with Te Ākau and its aspirations for future generations. Te Kauika o Patuharakeke Waka Ama submits that the proposal threatens its relationship with the moana and is inconsistent with the club's values, objectives and responsibilities as tangata whenua and active marine users. The club recommends that the application be declined.	Cultural Advisors; Planning Team	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Cultural Values, Assessment of Effects and Recommendations. Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A). C.McCallum's statement of evidence dated 12 August 2026	The application recognises that Te Ākau/Bream Bay holds significant cultural, social and recreational importance for tangata whenua, including groups who maintain active relationships with the moana through customary use, recreation, education and community activities. Multiple Cultural Impact Assessments and engagement processes have informed the assessment of cultural effects and the development of proposed management measures. While some groups oppose marine sand extraction as a matter of principle, MBL's position is that the proposal can proceed while appropriately recognising cultural values through the proposed environmental management framework, monitoring programme and tangata whenua participation mechanisms.
TKPWA-02	The proposal threatens the club's ability to reconnect rangatahi, whānau and community members with the moana. The club explains that it was established to reconnect whānau, hapū, local kura and the wider community with the moana through waka ama and that Te Ākau forms an important part of that cultural and educational experience. The club is concerned that industrialisation of the marine environment will undermine these objectives.	Cultural Advisors; Planning Team	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Cultural Values, Relationship with Te Ākau and Assessment of Effects.	The application acknowledges the importance of Te Ākau as a place for cultural learning, recreation, community connection and the transfer of knowledge between generations. The proposed extraction area is located approximately 4.7 km offshore and does not restrict public access to beaches, coastal areas or nearshore waters used for recreation and community activities. MBL's assessments conclude that significant adverse effects on the environmental values that support these activities are unlikely, and that ongoing cultural engagement and environmental monitoring provide additional safeguards throughout the life of the project.
TKPWA-03	Potential impacts on waka ama activities, training programmes and marine access. The club submits that its members regularly paddle throughout Te Ākau, including offshore routes, and that the extraction area forms part of the wider marine environment actively used for training, events, rangatahi development and community activities. Concerns are raised regarding safe access and continued use of the marine area.	Captain Bruce Goodchild; Planning Team	Assessment of Navigational Safety Effects (Attachment 19) - Designated Area and Shipping Movements (Page 2-13).	Recreation, navigation safety and marine use considerations were assessed as part of the application. The Navigation Safety Assessment evaluated vessel movements, operational areas and interactions with other marine users and concluded that navigational risks can be appropriately managed through operational controls, communication procedures and proposed consent conditions. The proposed activity does not exclude public access to the wider marine environment and is not expected to materially affect waka ama activities, training programmes or recreational use of Te Ākau/Bream Bay.
TKPWA-04	Industrial vessel activity may affect paddler safety and confidence. The club submits that many of its members are tamariki, rangatahi, novice paddlers and kaumātua and that the presence of extraction vessels, associated marine traffic and uncertainty regarding operational areas may affect safety planning and confidence when using the marine environment.	Captain Bruce Goodchild	Assessment of Navigational Safety Effects (Attachment 19) – Designated Area and Shipping Movements (Page 2-13). Recommended Resource Consent Conditions (Attachment 26) – Navigation Safety Conditions.	The Navigation Safety Assessment considered vessel traffic associated with extraction operations, including interactions with recreational users of the marine environment. The assessment concluded that navigation risks can be appropriately managed through established maritime safety procedures, operational protocols and proposed consent conditions. MBL acknowledges the importance of safety for all marine users and considers that the proposed operational framework provides an appropriate level of protection for recreational activities, including waka ama.
TKPWA-05	Potential cumulative effects on Te Ākau from multiple industrial activities. The club submits that Te Ākau already experiences pressure from industrial development, shipping activity, dredging, habitat degradation and other environmental stressors. It considers that an additional 35 years of sand extraction would contribute to cumulative environmental pressures and uncertainty regarding future environmental resilience.	Planning Team; Relevant Technical Experts	AEE – Cumulative Effects Assessment. Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects (Sections 5–6).	The application includes consideration of cumulative effects across coastal processes, benthic ecology, fisheries, marine mammals, seabirds and water quality. Existing and reasonably foreseeable activities within the wider marine environment were considered where relevant. The assessments concluded that cumulative effects are unlikely to result in significant adverse environmental outcomes and that the proposed monitoring framework provides an ongoing mechanism to verify environmental performance and identify any unforeseen cumulative effects over time.
TKPWA-06	Potential environmental degradation and long-term effects on the moana. The club submits that the proposal creates concerns regarding environmental degradation, ecological effects and the long-term condition of the marine environment upon which the club depends for its activities and cultural objectives.	Bioresearches Group; R.O. Boyd; NIWA; SLR Consulting NZ	Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–9). Assessment of Fish and Fisheries Effects (Attachment 16) – Potential Sand Dredging Effects and Conclusions (Sections 5–7).	The proposal is supported by specialist assessments addressing benthic ecology, fisheries, water quality, coastal processes, marine mammals and seabirds. Collectively, these assessments conclude that environmental effects can be appropriately avoided, remedied or mitigated through the proposed consent conditions, management plans and monitoring framework. MBL's position is that the proposal can proceed while maintaining the overall health and functioning of the marine environment and the values associated with Te Ākau/Bream Bay.
TKPWA-07	Protection of future generations' ability to access and connect with Te Ākau. The club emphasises that its opposition reflects not only current use but also an obligation to protect future generations' ability to paddle, learn, gather and maintain relationships with Te Ākau. The submission considers that long-term commercial extraction may compromise these future opportunities.	Cultural Advisors; Planning Team	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Cultural Values, Kaitiakitanga and Recommendations. Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A).	The application acknowledges the importance of protecting the ability of future generations to maintain cultural, recreational and community connections with Te Ākau/Bream Bay. The proposed management framework has been designed to ensure environmental effects remain at acceptable levels through monitoring, reporting, review and adaptive management provisions. MBL considers that the proposal can provide important regional and national benefits while maintaining the environmental values that support ongoing cultural and recreational use of the moana for current and future generations.

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24. Te Iwitahi Manihera Whānau				
TIM-01	McCallum Bros did not meaningfully engage with the rightful and evidenced Tangata Whenua Tangata Moana of Bream Bay / Te Ākau. The submission states that Te Iwitahi Manihera whānau repeatedly sought engagement with McCallum Bros and provided information regarding customary interests, but considers that MBL ultimately failed to engage with those persons they consider to be the rightful representatives of Te Parawhau and associated hapū.	Planning Team; Cultural Advisors	AEE – Consultation and Engagement Record. Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Consultation and Engagement Process. C.McCallum’s statement of evidence dated 10 August 2026	MBL has undertaken extensive engagement with tangata whenua throughout the development of the proposal, including engagement with iwi, hapū, Māori organisations and cultural representatives identified through consultation processes and advice received during project development. The application records the engagement undertaken, feedback received and steps taken to incorporate cultural considerations into project design, management plans and proposed consent conditions. MBL acknowledges that views differ regarding representation and engagement but considers that substantial efforts have been made to engage with affected tangata whenua interests.
TIM-02	Challenge to the legitimacy of Te Pouwhenua o Tiakiriri Kūkupa Trust and Te Parawhau ki Tai as representatives of Te Parawhau. The submission alleges that Te Pouwhenua o Tiakiriri Kūkupa Trust does not have a mandate to represent Te Parawhau and disputes its role in engagement, cultural assessment processes and agreements entered into with MBL.	Planning Team; Cultural Advisors	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Cultural Values, Engagement and Recommendations. Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A).	Questions regarding representation, mandate and authority within tangata whenua groups are matters for those groups themselves and are not matters on which MBL seeks to take a position. The application records engagement undertaken with tangata whenua organisations that elected to participate in the process and includes Cultural Impact Assessments prepared by those groups. The Expert Panel will determine the weight to be given to the various cultural perspectives presented through the application and invited comments process.
TIM-03	Disagreement regarding who holds Tangata Whenua Tangata Moana status within Bream Bay and Te Ākau. The submission argues that Te Parawhau, Ngāti Kahu Torongare and Ngāti Tū are the senior or predominant Tangata Whenua Tangata Moana groups within the application area and refers extensively to MACA evidence, whakapapa records and Treaty claim material.	Planning Team; Cultural Advisors	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22). Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A). C.McCallum’s statement of evidence dated 12 August 2026	The application recognises that differing views exist regarding customary interests, mana whenua relationships and tangata moana status within the wider Te Ākau/Bream Bay area. MBL does not seek to resolve competing claims of cultural authority. Instead, the application records the engagement undertaken and presents the cultural perspectives received through consultation and Cultural Impact Assessments. MBL acknowledges that these matters are ultimately for the relevant tangata whenua groups and, where relevant, other statutory processes to determine.
TIM-04	Concern regarding reliance on information provided by Northland Regional Council and cultural advisors. The submission alleges that advice provided to MBL regarding who should be consulted was incomplete or misleading and resulted in the exclusion of certain whānau and hapū representatives from engagement processes.	Planning Team	AEE – Consultation and Engagement Record. Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Consultation and Engagement Process.	MBL relied on information obtained through consultation, publicly available information, advice received during project development and engagement undertaken with tangata whenua groups and representatives. The consultation process evolved over time as additional information became available and as further engagement opportunities arose. MBL considers that the engagement undertaken was reasonable and appropriate in the context of the project and statutory process.
TIM-05	Questions regarding future cultural monitoring and who MBL would work with if consent is granted. The submission asks who would undertake cultural monitoring and environmental oversight if consent is granted, given the submitters' view that the wrong entities have been recognised as tangata whenua representatives.	Planning Team; Cultural Advisors	Recommended Resource Consent Conditions (Attachment 26) – Cultural Liaison, Mana Whenua Participation and Management Plan Conditions. Environmental Monitoring Management Plan (Attachment 29) – Monitoring and Reporting Framework.	The proposed consent framework includes provisions relating to tangata whenua participation, cultural engagement, environmental monitoring and review of management plans. Should consent be granted, MBL intends to continue engaging with tangata whenua and to implement the requirements of any consent conditions imposed by the Expert Panel. The precise structure of future cultural monitoring arrangements will ultimately depend on the conditions approved and ongoing engagement with relevant tangata whenua groups.
TIM-06	The application area is subject to MACA and Treaty interests that are not adequately recognised. The submission refers to Marine and Coastal Area (Takutai Moana) Act proceedings, Waitangi Tribunal material and historical evidence which it says demonstrates continuing customary interests within the application area and surrounding coastal environment.	Planning Team; Cultural Advisors	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22). AEE – Statutory Assessment and Existing Environment.	The application acknowledges that various tangata whenua groups hold or are pursuing rights and interests under the Marine and Coastal Area (Takutai Moana) Act and other processes relating to customary rights and interests. The application has been assessed within the relevant statutory framework and includes consideration of cultural values, customary relationships and tangata whenua interests through Cultural Impact Assessments and engagement processes. The Expert Panel will determine the significance of these matters in the context of the application.
TIM-07	Potential environmental effects on fish, shellfish, birds and the wider marine environment. While largely focused on representation issues, the submission also expresses concern regarding impacts on fisheries, shellfish, birds, marine ecosystems and the cumulative effects of additional industrial activity within an already modified coastal environment.	R.O. Boyd; Bioresearches Group; NIWA; SLR Consulting NZ	Assessment of Fish and Fisheries Effects (Attachment 16) – Potential Sand Dredging Effects and Conclusions (Sections 5–7). Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects (Sections 4–5). Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8). R.O. Boyd's statement of evidence dated 12 August 2026.	Specialist assessments of fisheries resources, benthic ecology, seabirds, shorebirds, marine mammals and water quality were undertaken to evaluate potential environmental effects associated with the proposal. These assessments considered habitat values, ecological functioning, population-level effects and recovery processes and concluded that environmental effects can be appropriately avoided, remedied or mitigated through the proposed consent conditions, management plans and monitoring framework. Ongoing environmental monitoring is proposed to verify environmental performance throughout operations. Additionally, MBL defer to R.O.Boyd's statement of evidence on Fish and Fisheries.
TIM-08	Concern regarding cumulative industrialisation of Whangārei Harbour and Te Ākau. The submission refers to Northport, Channel Infrastructure, dredging, pollution and other industrial activities already affecting the harbour and wider coastal environment and submits that additional industrial activities should be approached cautiously.	Planning Team; Relevant Technical Experts	AEE – Cumulative Effects Assessment. Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects (Sections 5–6).	The application includes consideration of cumulative effects across coastal processes, benthic ecology, fisheries, marine mammals, seabirds and water quality. Existing and reasonably foreseeable activities within the wider marine environment were considered where relevant. The assessments concluded that cumulative effects are unlikely to result in significant adverse environmental outcomes and that the proposed monitoring and adaptive management framework provides an ongoing mechanism to verify environmental performance over time.
25. Whangarei Heads Citizens Association (WHCA)				
WHCA-01	There is no demonstrated sand shortage and therefore no need for the project. WHCArelies on commissioned reports and commentary asserting Auckland already has sufficient sand supply and that manufactured sand provides a viable alternative. They argue the project's need case has not been established.	M.E Consulting (Economics); Paul Donoghue	AEE – Overall Assessment of Effects and Statutory Assessment. Assessment of Economic Effects (Attachment 18) – Regional and National Economic Benefits (Section 6).	The Economic Effects Assessment evaluated future demand for suitable concrete-grade sand, existing supply sources, projected supply constraints and the suitability of alternative materials. The assessment concluded that a long-term supply deficit is expected to emerge under projected growth scenarios and that existing marine sand sources, terrestrial quarries and manufactured sand are unlikely to fully satisfy future demand. The proposal would contribute to maintaining a secure and diversified supply of construction materials required to support housing, infrastructure and economic development across the upper North Island.
WHCA-02	Economic benefits are overstated and primarily accrue to McCallum Bros rather than Northland. WHCA argues the economic assessment overstates benefits, understates costs and fails to demonstrate meaningful local employment or economic gains.	M.E Consulting; Planning	Assessment of Economic Effects (Attachment 18) – Supply Assessment, Demand Outlook and Alternative Supply Considerations (Sections 3–4). Concrete Suitability Statement (Attachment 20). L.McIlrath statement of evidence dated 12 August 2026.	The Economic Effects Assessment considered both direct and indirect economic effects, including impacts on construction supply chains, infrastructure delivery, economic activity and regional development. The assessment concluded that the proposal would provide benefits extending beyond the consent holder through supporting housing construction, infrastructure investment and broader economic productivity. MBL’s position is that these benefits have been robustly assessed and are not limited solely to private commercial outcomes.
WHCA-03	Sand extraction will damage benthic habitats, scallop beds, shellfish populations and wider marine ecosystems. Particular concern is	Bioresearches; R.O. Boyd; NIWA	Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–	Detailed investigations of benthic ecology, fisheries resources, shellfish populations and marine food web processes were undertaken within and surrounding the extraction area. The assessments considered habitat

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	raised regarding scallop recovery, benthic communities, cup corals and long-term ecosystem recovery.		8). Assessment of Fish and Fisheries Effects (Attachment 16) – Potential Sand Dredging Effects and Conclusions (Sections 5–7). Assessment of Scleractinian Cup Coral Effects (Attachment 21) – Effects Assessment and Conclusions (Sections 4–5). S.West's statement of evidence dated 12 August 2026. J.Beaumont's statement of evidence dated 12 August 2026.	values, ecological functioning, recovery processes and population-level effects. The assessments concluded that effects will be largely confined to the extraction footprint, that ecological recovery is expected over time, and that significant adverse population-level effects on scallops, shellfish resources and wider marine ecosystems are unlikely. These conclusions are supported by a comprehensive environmental monitoring programme and adaptive management framework. MBL defer to J. Beaumont's statement of evidence on Cup Corals. Additionally, MBL defer to R.O.Boyd's statement of evidence on Fish and Fisheries.
WHCA-04	Sand extraction may adversely affect marine mammals, seabirds and threatened species including Tara iti. Concerns are raised regarding endangered dolphins, seabirds and wider biodiversity values.	NIWA; SLR Consulting	Assessment of Marine Mammal Effects (Attachment 14) – Environmental Impact Assessment and Conclusions (Sections 4–6). Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects (Sections 4–5). D.Thompson's statement of evidence dated 12 August 2026. H.McConnell's statement of evidence dated 12 August 2026	Specialist assessments of marine mammals, seabirds, shorebirds and protected species evaluated habitat use, prey availability, behavioural responses, underwater noise, vessel activity and ecological pathways. The assessments concluded that significant adverse population-level effects on marine mammals, tara iti and other protected species are unlikely. These findings are supported by the Marine Mammal Management Plan, Wildlife Approval Conditions and ongoing monitoring requirements designed to verify environmental performance throughout operations. MBL defer to D.Thompson and H.McConnell's statements of evidence for further context.
WHCA-05	The project may alter coastal processes, sediment transport and contribute to beach erosion. WHCA repeatedly argues Bream Bay is a closed sand system and extraction may affect beach stability, dune recovery and shoreline resilience.	Tonkin + Taylor	Assessment of Coastal Process Effects (Attachment 8) – Sediment Transport Assessment, Coastal Process Effects and Conclusions (Sections 4–7). R.Reinen-Hamill and E.Beetham’s joint statement of evidence dated 12 August 2026.	The Coastal Process Effects Assessment incorporated bathymetric surveys, sediment investigations, seabed characterisation and coastal process analysis to assess potential effects on sediment transport pathways, shoreline stability, beach morphology and dune systems. The assessment concluded that the extraction area is located beyond the depth of closure and outside the active nearshore sediment transport system, such that significant effects on beaches, dunes and coastal landforms are not expected. These conclusions are supported by proposed bathymetric monitoring, control area comparisons and adaptive management provisions throughout the life of the project. MBL defer to Mr Reinen-Hamill and Mr Beetham’s joint statement of evidence in relation to Coastal Processes.
WHCA-06	Potential adverse effects on surf breaks and recreational use. Concerns are raised regarding surfing, swimming, boating, fishing and recreational enjoyment of Bream Bay.	MetOcean Solutions; B.Goodchild; R.O. Boyd	Assessment of Surf Break Effects (Attachment 17) – Assessment of Effects and Conclusions (Sections 5–7). Assessment of Navigational Safety Effects (Attachment 19) – Risk Assessment and Conclusions (Sections 4–6). R.O. Boyd's statement of evidence dated 9 August 2026. B.Beamsley statement of evidence dated 12 August 2026.	Specialist investigations assessed potential effects on wave climate, surf breaks, recreation and coastal amenity values. The assessments concluded that the proposed extraction activity is unlikely to result in measurable changes to wave conditions, surf break quality or recreational opportunities due to the offshore location of the extraction area and the limited influence on nearshore coastal processes. Navigation, recreation and public access values are expected to remain available throughout the life of the project. Dr Brett Beamsley that modelling shows the proposed extraction will have negligible to imperceptible effects on surf breaks, wave conditions and recreational wave amenity throughout Te Ākau Bream Bay. He finds the concerns raised by submitters are not supported by the modelling evidence. Additionally, MBL defer to R.O.Boyd's statement of evidence on Fish and Fisheries.
WHCA-07	Cumulative effects with Channel Infrastructure dredging have not been adequately assessed. WHCA repeatedly argues both projects affect the same wider sand system and cumulative effects remain uncertain.	Tonkin + Taylor; SLR; Bioresearches; Planning	AEE – Cumulative Effects Assessment. Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects (Sections 5–6).	The application includes consideration of cumulative effects across coastal processes, benthic ecology, fisheries, marine mammals, seabirds and water quality. Existing and reasonably foreseeable activities within the wider marine environment were considered where relevant. The assessments concluded that cumulative effects are unlikely to result in significant adverse environmental outcomes and that the proposed monitoring framework provides an ongoing mechanism to verify environmental performance and identify any unforeseen cumulative effects over time.
WHCA-08	Monitoring and proposed consent conditions will not adequately manage uncertainty. WHCA argues ecological effects may be difficult to detect or reverse and that adaptive management will be insufficient.	Planning Team; Relevant Technical Experts	Environmental Monitoring Management Plan (Attachment 29) – Monitoring, Reporting and Adaptive Management Framework. Recommended Resource Consent Conditions (Attachment 26) – Monitoring, Review and Adaptive Management Conditions.	The proposed consent framework includes one of the most comprehensive monitoring programmes developed for a marine sand extraction operation in New Zealand. Monitoring of benthic ecology, fisheries, bathymetry, water quality, marine mammals, underwater noise and other environmental indicators is supported by reporting obligations, review mechanisms, certification requirements and adaptive management provisions. MBL's position is that monitoring and adaptive management operate as additional safeguards alongside the extensive technical assessments already undertaken.
WHCA-09	Consultation and Fast Track process concerns. WHCA alleges insufficient public participation, inadequate community involvement and inadequate engagement with mana whenua.	Planning Team; Cultural Advisors	AEE – Consultation and Engagement Record. Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Consultation and Engagement Process.	MBL has undertaken extensive engagement with iwi, hapū, community organisations, local authorities, industry groups and government agencies throughout project development. The application has also been subject to invited comments, Requests for Information, public release of technical material and Expert Panel review. The appropriateness of the statutory process itself is ultimately a matter determined through the Fast-track Approvals Act framework established by Parliament.
WHCA-10	Strong community opposition demonstrates the project lacks social licence. WHCA relies on petitions, surveys, council resolutions, candidate surveys, protests and community campaigns to demonstrate opposition. The petition material refers to more than 14,500 signatures and surveys reporting approximately 95–97% opposition.	Planning Team	AEE – Consultation and Engagement Record. Assessment of Economic Effects (Attachment 18) – Regional and National Economic Benefits (Section 6).	The application acknowledges that there are differing views regarding the proposal within the community. Community submissions, petitions, surveys and stakeholder feedback form part of the evidential record before the Expert Panel. MBL's position is that the proposal should ultimately be assessed against the statutory criteria of the Fast-track Approvals Act, informed by the technical evidence regarding environmental effects, proposed mitigation measures and the benefits of the project.
WHCA-11	Concerns regarding McCallum Bros' historical compliance record at Pakiri. WHCA repeatedly references Environment Court proceedings and historic compliance issues associated with Pakiri sand extraction activities.	Planning Team	Environmental Monitoring Management Plan (Attachment 29) – Monitoring and Compliance Framework. Recommended Resource Consent Conditions (Attachment 26) – Monitoring, Reporting and Review Conditions.	The current application has been assessed on its own merits and is supported by a comprehensive suite of technical assessments, management plans and proposed consent conditions specific to Te Ākau/Bream Bay. The proposed consent framework includes extensive monitoring, reporting, review and adaptive management provisions designed to verify environmental performance and ensure compliance throughout the life of the project. The Expert Panel's assessment is focused on the environmental effects, mitigation measures and conditions proposed for the current application.
26. Minister for Tourism and Hospitality (Louise Upston)				
MTH-01	Potential effects on tourism and hospitality arising from impacts on Bream Bay's natural environment. The Minister notes that tourism is important to Northland's economy and that Bream Bay's natural	M.E Consulting; Brown NZ Ltd; Planning	Assessment of Economic Effects (Attachment 18). Assessment of Landscape and Natural Character Effects	The application recognises the importance of Northland's natural environment to regional tourism, hospitality and visitor experiences. Specialist assessments of coastal processes, marine ecology, water quality, recreation, landscape and natural character were undertaken to evaluate potential effects on the environmental values that

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	coastal environment contributes significantly to visitor attraction and regional tourism performance. Any degradation of environmental values could indirectly affect tourism operators and visitor experiences.		(Attachment 7) – Assessment of Effects and Conclusions (Sections 8–10).	contribute to tourism and recreational use of Bream Bay. These assessments conclude that significant adverse effects on these values are unlikely and that environmental effects can be appropriately managed through the proposed consent conditions, management plans and monitoring framework.
MTH-02	Potential impacts on marine mammals, biodiversity and coastal processes that contribute to visitor experiences. The Minister notes that these environmental attributes form part of Northland’s tourism appeal and should be protected.	SLR Consulting; NIWA; Tonkin + Taylor	Assessment of Marine Mammal Effects (Attachment 14) – Environmental Impact Assessment and Conclusions (Sections 4–6). Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects (Sections 4–5). Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects and Conclusions (Sections 5–7). R.Reinen-Hamill and E.Beetham’s joint statement of evidence dated 12 August 2026. H.McConnell's statement of evidence dated 12 August 2026	Dedicated assessments of marine mammals, seabirds, benthic ecology, fisheries, water quality and coastal processes were undertaken by specialist experts. These investigations evaluated habitat use, ecological functioning, biodiversity values and coastal system dynamics and concluded that significant adverse population-level or ecosystem-level effects are unlikely. MBL agrees that these environmental values are important to the region and considers that the proposed management framework provides appropriate safeguards for their protection. MBL defer to Mr Reinen-Hamill and Mr Beetham’s joint statement of evidence in relation to Coastal Processes additionally, MBL defer to H. McConnell's statement of evidence on Marine Mammals.
MTH-03	Potential effects on recreational activities including surfing, fishing, boating, swimming and diving. The Minister notes that these activities contribute to tourism and hospitality outcomes and should be protected where possible.	MetOcean Solutions; R.O. Boyd; B. Goodchild	Assessment of Surf Break Effects (Attachment 17) – Assessment of Effects and Conclusions (Sections 5–7). Assessment of Navigational Safety Effects (Attachment 19) – Risk Assessment and Conclusions (Sections 4–6). R.O. Boyd's statement of evidence dated 9 August 2026.	The application includes assessments of surf breaks, navigation safety, fisheries, recreation and coastal processes. The proposed extraction area is located approximately 4.7 km offshore and the assessments conclude that significant adverse effects on recreational activities, public access and coastal amenity values are unlikely. The proposal is therefore not expected to materially affect the recreational experiences that contribute to Northland's tourism and hospitality sector. Additionally, MBL defer to R.O.Boyd's statement of evidence on Fish and Fisheries.
MTH-04	Community perceptions of environmental risk may influence visitor behaviour and destination reputation. The Minister notes that concerns regarding marine ecosystems and protected species may affect perceptions of Northland as a tourism destination.	Planning; M.E Consulting	Assessment of Marine Mammal Effects (Attachment 14) – Conclusions (Section 6). Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Summary (Section 5). Assessment of Benthic Ecology Effects (Attachment 12)	MBL acknowledges that community perceptions can influence public attitudes towards development proposals and environmental management. The application has therefore been supported by extensive technical investigations, environmental assessments, management plans and proposed monitoring programmes designed to provide a robust evidential basis for decision-making. MBL's position is that the proposal can proceed while maintaining environmental values and providing confidence that effects will be appropriately managed throughout the life of the project.
MTH-05	Support for comprehensive environmental monitoring, adaptive management and biodiversity protection. The Minister encourages robust conditions should consent be granted.	Planning Team; Relevant Technical Experts	Environmental Monitoring Management Plan (Attachment 29) – Monitoring, Reporting and Adaptive Management Framework. Recommended Resource Consent Conditions (Attachment 26) – Monitoring, Review and Adaptive Management Conditions.	MBL agrees with the importance of comprehensive monitoring and adaptive management. The proposal includes an extensive Environmental Monitoring Management Plan together with monitoring programmes addressing benthic ecology, fisheries, bathymetry, water quality, marine mammals, seabirds and protected species. These measures are supported by reporting requirements, review mechanisms and adaptive management provisions designed to ensure environmental performance is verified and any unforeseen effects are appropriately managed.
27. Kōwhai Te Awhina Hapū o Te Parawhau Hapū Incorporation				
KTA-01	The proposal should be assessed through tikanga, mana moana and intergenerational stewardship principles rather than solely conventional environmental management frameworks. The Incorporation submits that consultation alone is insufficient and that decision-making affecting Te Ākau should recognise mana whenua responsibilities, protection of mauri, tikanga obligations and intergenerational stewardship. Pages 1–2.	Cultural Advisors; Planning Team	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Cultural Values, Kaitiakitanga and Recommendations. Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A).	The application recognises that assessment of effects extends beyond conventional biophysical considerations and includes cultural values, mana whenua relationships, kaitiakitanga responsibilities and intergenerational stewardship. These matters have been considered through multiple Cultural Impact Assessments, tangata whenua engagement processes and proposed cultural monitoring and participation provisions. MBL acknowledges that differing cultural perspectives exist regarding marine sand extraction, while maintaining that the application provides a framework through which cultural values can be recognised and incorporated into project management and environmental oversight.
KTA-02	Significant uncertainty remains regarding ecological recovery, sediment transport, shoreline connectivity and cumulative effects. The Incorporation submits that the additional information requested through Minute 4, 6 and 7 demonstrates that important uncertainties remain unresolved. Pages 3–4.	Tonkin + Taylor; Bioresearches; Planning Team	Assessment of Coastal Process Effects (Attachment 8) – Sediment Transport Assessment, Coastal Process Effects and Conclusions (Sections 4–7). AEE – Cumulative Effects Assessment.	The application includes detailed investigations of coastal processes, benthic ecology, fisheries resources, marine mammals, seabirds and water quality. These assessments considered recovery processes, sediment dynamics, ecological functioning and cumulative effects and concluded that significant adverse environmental outcomes are unlikely. The proposed monitoring framework, including bathymetric, ecological and fisheries monitoring, provides an ongoing mechanism to verify environmental performance and improve understanding of environmental responses throughout the life of the project.
KTA-03	Ecological recovery opportunities should not be dismissed because the current environment is degraded. The submission argues that future ecological restoration, scallop recovery, benthic habitat recovery and ecosystem enhancement remain legitimate outcomes that should be considered when assessing future environmental trajectories. Pages 4–5.	Bioresearches Group; R.O. Boyd; S.West	Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8). Assessment of Fish and Fisheries Effects (Attachment 16) – Potential Sand Dredging Effects and Conclusions (Sections 5–7). S.West's statement of evidence dated 12 August 2026.	The application does not assume that existing environmental conditions diminish the importance of ecological values or future recovery opportunities. Rather, the ecological assessments considered current environmental conditions, habitat values, recovery processes and ecological trajectories over time. The assessments concluded that while localised disturbance will occur within the extraction footprint, ecological recovery is expected and significant adverse ecosystem-level effects are unlikely. Monitoring provisions have been specifically designed to assess recovery pathways and environmental performance. Additionally, MBL defer to S.West's statement of evidence on Benthic Ecology.
KTA-04	Precaution should operate both ways. The Incorporation submits that uncertainty should not automatically favour extraction simply because ecological recovery outcomes are uncertain. Rather, uncertainty should also weigh against potentially irreversible extraction effects. Page 5.	Planning Team; Relevant Experts	AEE – Statutory Assessment. Assessment of Coastal Process Effects (Attachment 8) – Conclusions (Section 7).	MBL acknowledges the importance of the precautionary approach where uncertainty exists. The application has adopted a precautionary framework through extensive baseline investigations, specialist technical assessments, conservative assumptions where appropriate, proposed management plans and comprehensive monitoring requirements. MBL's position is that precaution should be informed by the best available evidence and applied in a manner that appropriately balances environmental protection, uncertainty and the potential benefits of the proposal.
KTA-05	Regional economic benefits should not outweigh localised cultural and environmental burdens. The submission accepts that benefits may occur elsewhere but argues the environmental and cultural burden falls primarily upon Te Ākau and the surrounding hapū rohe. Pages 6–8.	M.E Consulting; Cultural Advisors; Planning Team	Assessment of Economic Effects (Attachment 18) – Regional and National Economic Benefits (Section 6). Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22). L.McIlrath statement of evidence dated 12 August 2026.	The application includes assessments of environmental, cultural, social and economic effects and does not rely solely on economic benefits to justify the proposal. Cultural values, ecological effects, fisheries resources, coastal processes and tangata whenua interests have been specifically assessed and form an important part of the overall evaluation. MBL's position is that environmental and cultural effects can be appropriately managed through the proposed consent conditions, management plans and monitoring framework while enabling the project to deliver significant regional and national benefits.

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KTA-06	The proposal directly affects the receiving environment used by Te Parawhau and therefore raises mana whenua and mana moana responsibilities. The Incorporation states that ongoing fishing, gathering, occupation and cultural relationships mean environmental effects are not remote or abstract but directly experienced by hapū members. Pages 8–10.	Cultural Advisors; Planning Team	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Cultural Values, Relationship with Te Ākau and Assessment of Effects. Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A).	The application recognises the cultural relationship of Te Parawhau and other tangata whenua groups with Te Ākau/Bream Bay and acknowledges that the receiving environment continues to be used for customary, cultural and recreational purposes. These relationships were considered through Cultural Impact Assessments and engagement processes, and informed the development of proposed management measures, monitoring programmes and tangata whenua participation provisions.
KTA-07	Minute 7 material demonstrates uncertainty remains regarding monitoring, adaptive management and ecological recovery pathways. The Incorporation submits that the ongoing evolution of draft conditions and monitoring frameworks demonstrates unresolved uncertainty. Pages 10–12.	Planning Team; Relevant Experts	Environmental Monitoring Management Plan (Attachment 29) – Monitoring, Reporting and Adaptive Management Framework. Recommended Resource Consent Conditions (Attachment 26) – Monitoring, Review and Adaptive Management Conditions.	The additional information provided through the Fast-track process reflects the continuing refinement of monitoring methodologies, management plans and consent conditions as part of the assessment process. MBL's position is that the evolution of monitoring and management frameworks demonstrates responsiveness to issues raised by the Expert Panel and stakeholders rather than an absence of understanding regarding environmental effects. The proposed framework provides a robust basis for environmental monitoring, reporting and adaptive management.
KTA-08	Adaptive management cannot replace precaution. The submission argues that monitoring often identifies effects after they occur and may not prevent irreversible impacts. Pages 12–14.	Planning Team; Relevant Experts	Environmental Monitoring Management Plan (Attachment 29) – Adaptive Management Framework. Recommended Resource Consent Conditions (Attachment 26) – Review and Adaptive Management Conditions.	The proposal is supported by extensive baseline investigations and specialist technical assessments across all relevant environmental disciplines. Adaptive management is proposed as an additional safeguard that enables monitoring results to inform management responses if unexpected effects arise. MBL considers that the combination of assessment, monitoring and adaptive management provides a comprehensive and precautionary environmental management framework.
KTA-09	Conditions remain dependent upon future information and unresolved management pathways. The Incorporation submits that several key aspects of the monitoring, certification and adaptive management framework remain dependent on future information and refinement. Pages 13–14.	Planning Team	Recommended Resource Consent Conditions (Attachment 26) – Certification, Management Plan and Review Conditions. Environmental Monitoring Management Plan (Attachment 29).	The proposed consent framework includes monitoring, certification, reporting and review provisions that allow management responses to be informed by environmental performance throughout operations. Such mechanisms are a common feature of complex marine projects where ongoing monitoring provides additional information over time. MBL considers that the proposed framework provides clear management pathways while retaining sufficient flexibility to respond appropriately to environmental conditions should unexpected effects occur.
KTA-10	Long-term environmental, cultural and intergenerational responsibilities require a precautionary approach where irreversible effects remain possible. The Incorporation concludes that unresolved uncertainty regarding sediment transport, ecological recovery, cumulative effects and receiving environment responses warrants a cautious approach. Pages 12–14.	Cultural Advisors; Planning Team; Relevant Experts	AEE – Cumulative Effects Assessment and Statutory Assessment. Assessment of Coastal Process Effects (Attachment 8.	The application acknowledges the importance of protecting environmental and cultural values for future generations. The proposal has therefore been supported by extensive technical assessments, Cultural Impact Assessments, management plans and monitoring programmes designed to identify, avoid, remedy or mitigate adverse effects. MBL's position is that the available evidence demonstrates that significant adverse environmental outcomes are unlikely and that the proposed monitoring and adaptive management framework provides an appropriate mechanism for managing uncertainty while protecting long-term environmental and cultural values.
28. Seafood New Zealand				
SNZ-01	Commercial fishing activity occurs within the proposed extraction area and fishers are concerned about loss of access to fishing grounds. Seafood New Zealand notes that Bream Bay is actively used by commercial fishers, particularly bottom trawl and bottom longline operators. Approximately 12% of bottom trawl events and 4% of bottom longline events within the wider Bream Bay area intersect with the proposed extraction area. Fishers are concerned about potential operational displacement.	R.O. Boyd; Planning Team	Assessment of Fish and Fisheries Effects (Attachment 16) – Existing Fisheries Environment, Commercial Fisheries and Assessment of Effects (Sections 4–6). R.O. Boyd's statement of evidence dated 12 August 2026.	The Fisheries Effects Assessment specifically evaluated commercial fishing activity within and surrounding the proposed extraction area, including analysis of fishing effort and spatial overlap with existing fisheries. The assessment concluded that while some operational interaction between extraction activities and commercial fishing may occur, the extraction area represents a relatively small proportion of the wider fishing grounds available within Bream Bay. MBL acknowledges the importance of maintaining access for commercial fishers and has engaged with industry representatives regarding practical measures to facilitate coexistence of extraction and fishing activities. Additionally, MBL defer to R.O.Boyd's statement of evidence on Fish and Fisheries.
SNZ-02	Support for development of an operational protocol between fishers and McCallum Bros. SNZ records that fishers sought confirmation that the extraction area would not be exclusively occupied and that fishing could continue alongside extraction operations. The submission notes discussions regarding development of an operational protocol, including advance notice of extraction schedules and communication regarding active dredging operations.	R.O. Boyd; Captain Bruce Goodchild; Planning Team	Sand Extraction Operation Plan (Attachment 27) – Operational Procedures and Stakeholder Communication Protocols. Recommended Resource Consent Conditions (Attachment 26) – Communication and Operational Management Conditions.	MBL supports the development of practical operational arrangements with commercial fishers to facilitate communication and minimise operational conflicts where practicable. Proposed management measures include notification procedures, communication protocols and ongoing engagement with affected stakeholders. MBL agrees that proactive information sharing regarding extraction schedules and operational activities can assist in minimising disruption to fishing operations and maintaining safe and efficient use of the marine environment.
SNZ-03	Concern regarding exposure of rock, sandstone or historical seabed layers that may damage trawl gear. SNZ notes that fishers experienced issues at Pākiri where sand extraction exposed hard substrates, rock and petrified tree material, creating areas that could no longer be safely trawled. Fishers are concerned that similar effects could occur within Bream Bay if underlying sandstone or other immobile layers become exposed.	R.O. Boyd; Bioresearches Group; Planning Team	Assessment of Fish and Fisheries Effects (Attachment 16) – Existing Environment and Assessment of Effects (Sections 4–6). Sand Extraction Operation Plan (Attachment 27) – Extraction Area Management and Operational Controls.	The application includes geophysical investigations, sediment sampling, vibrocore analysis and seabed characterisation studies designed to understand the nature of sediments within the extraction area. These investigations informed both resource assessment and environmental effects evaluations. MBL acknowledges the importance of avoiding adverse effects on fishing operations and considers that the proposed monitoring and management framework provides mechanisms to identify and respond to any unexpected seabed conditions encountered during extraction activities.
SNZ-04	Fishers question whether sufficient information exists regarding the presence of sandstone within the extraction area. While acknowledging bathymetry, core samples and geophysical information provided by MBL, SNZ notes that local fishers report patches of sandstone and foul ground within parts of the proposed extraction area. The submission seeks confidence that these areas will be identified and avoided.	Bioresearches Group; R.O. Boyd; Planning Team	Assessment of Fish and Fisheries Effects (Attachment 16) – Existing Environment, Seabed Characteristics and Assessment of Effects (Sections 4–6). Sand Extraction Operation Plan (Attachment 27) – Pre-operational Surveys and Extraction Controls.	Extensive site investigations were undertaken during project development, including bathymetric surveys, geophysical surveys and sediment sampling programmes. These investigations provide a substantial understanding of seabed conditions within the extraction area and informed the assessment of extraction feasibility and environmental effects. MBL considers that the available information provides an appropriate basis for assessment while recognising that operational monitoring can provide additional verification throughout the life of the project. Additionally, MBL defer to R.O.Boyd's statement of evidence on Fish and Fisheries.
SNZ-05	Requests for monitoring, reporting and notification of exposed rock or unsuitable seabed conditions. SNZ seeks clarity regarding what monitoring and reporting mechanisms will be used to identify exposed rock and how fishers will be notified if extraction activities encounter unsuitable seabed conditions that may affect trawling operations.	Planning Team; R.O. Boyd	Environmental Monitoring Management Plan (Attachment 29) – Monitoring, Reporting and Adaptive Management Framework. Sand Extraction Operation Plan (Attachment 27) – Operational Monitoring Procedures. Recommended Resource Consent Conditions (Attachment 26) – Monitoring and Reporting Conditions.	MBL acknowledges the value of clear monitoring and communication procedures where matters arise that may affect other marine users. The proposed Environmental Monitoring Management Plan includes monitoring, reporting and review provisions that support ongoing assessment of seabed conditions and environmental performance. MBL is open to continued engagement with the fishing industry regarding practical mechanisms for communication and notification should matters relevant to fishing operations arise during extraction activities.

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SNZ-06	Clarification sought regarding remediation obligations if rock is exposed and fishing grounds are affected. SNZ questions whether any obligation would exist to remediate exposed rock or restore trawlable seabed conditions if extraction activities were found to expose rocky substrate within fishing grounds.	Planning Team; R.O. Boyd	Recommended Resource Consent Conditions (Attachment 26) – Adaptive Management and Remedial Action Conditions. Environmental Monitoring Management Plan (Attachment 29) – Management Response Framework. Sand Extraction Operation Plan (Attachment 27) – Operational Response Procedures.	The proposed consent framework includes monitoring, reporting and adaptive management provisions designed to identify and respond to unforeseen environmental or operational issues should they arise. MBL's position is that any obligations relating to management responses, remediation measures or operational controls would ultimately be determined through the consent conditions imposed by the Expert Panel. MBL remains committed to ongoing engagement with affected stakeholders, including the commercial fishing sector, throughout the life of the project.
29. New Zealand Conservation Authority (NZCA)				
NZCA-01	The proposal is inconsistent with national conservation objectives and should not be approved. NZCA submits that the proposal is inconsistent with national conservation responsibilities, biodiversity protection objectives and conservation management principles. It considers that economic benefits do not outweigh the ecological risks associated with the proposal.	Planning Team; Relevant Technical Experts	AEE – Statutory Assessment and Overall Assessment of Effects. Assessment of Economic Effects (Attachment 18) – Regional and National Economic Benefits (Section 6). L.McIlrath statement of evidence dated 12 August 2026.	The application includes comprehensive assessments of coastal processes, marine ecology, fisheries, protected species, cultural values and economic effects. MBL's position is that the proposal is capable of proceeding while maintaining the ecological integrity of the receiving environment through the proposed consent conditions, management plans and monitoring framework. The application has been assessed against relevant statutory provisions and conservation-related considerations, and concludes that adverse effects can be appropriately avoided, remedied or mitigated.
NZCA-02	Marine noise effects may be significant and adaptive management is inadequate. NZCA submits that dredging operations, vessel activity and associated machinery will generate underwater noise capable of affecting marine mammals, seabirds and wider marine ecosystems. It questions whether adaptive management is sufficient to address potential impacts if adverse effects are detected. Pages 5–6.	Styles Group; SLR Consulting NZ; D.Thompson; M.Pine	Assessment of Underwater Noise Effects (Attachment 11) – Assessment of Effects and Conclusions (Sections 5–7). Marine Mammal Management Plan (Attachment 28). D.Thompson's statement of evidence dated 12 August 2026. M.Pine's statement of evidence dated 12 August 2026.	The Underwater Noise Assessment evaluated noise generated by dredging operations, vessel activity and associated equipment, including potential effects on marine mammals and other marine fauna. The assessment concluded that predicted underwater noise levels are unlikely to result in significant adverse population-level effects. Monitoring and adaptive management measures are proposed as additional safeguards to verify environmental performance and provide management responses should unexpected effects be identified. Dr David Thompson concludes that the proposed sand extraction will have minor to negligible effects on seabirds and shorebirds, including tara iti, because breeding habitat, prey availability and coastal processes will remain largely unaffected. He finds that any effects from turbidity, underwater noise, vessel activity, lighting and cumulative pressures are localised, temporary and unlikely to affect populations or long-term ecological function. Additionally, MBL defer to M.Pine's statement of evidence on underwater acoustics.
NZCA-03	Sediment plumes may reduce primary productivity and adversely affect marine food webs. NZCA submits that turbidity generated by sand extraction may reduce light penetration, affect phytoplankton and microphytobenthos productivity, reduce oxygen generation and affect marine food chains. Pages 5–6.	SLR Consulting NZ; Bioresearches Group	Assessment of Water Quality Effects (Attachment 9) – Assessment of Effects and Conclusions (Sections 5–7). Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8).	The Water Quality Effects Assessment evaluated sediment plume generation, suspended sediment concentrations, dispersion characteristics and potential ecological effects. The assessment concluded that sediment plume effects will be temporary, localised and rapidly dissipated within the receiving environment. Specialist ecological assessments further concluded that significant adverse effects on primary productivity, food web functioning and ecosystem processes are unlikely.
NZCA-04	Dredging may alter seabed habitat, increase sedimentation and fragment benthic communities. NZCA raises concerns regarding habitat fragmentation, changes in sediment composition, seabed trenching and long-term ecological recovery. Pages 6–7.	Bioresearches Group; R.O. Boyd	Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8). S.West's statement of evidence dated 12 August 2026.	Detailed benthic ecology investigations assessed habitat values, benthic community composition, sediment characteristics, ecological functioning and recovery processes. The assessments concluded that effects will largely be confined to the extraction footprint and that benthic recolonisation and ecological recovery are expected over time. Significant adverse ecosystem-level effects and widespread habitat fragmentation are not anticipated. These conclusions are supported by the proposed Environmental Monitoring Management Plan and benthic monitoring programme. Additionally, MBL defer to S.West's statement of evidence on Benthic Ecology.
NZCA-05	Potential coastal erosion and reduced shoreline resilience. NZCA submits that removal of marine sand may contribute to coastal erosion, weaken natural coastal defences and affect resilience to storms and sea-level rise. Page 6.	Tonkin + Taylor Ltd	Assessment of Coastal Process Effects (Attachment 8) – Coastal Process Effects and Conclusions (Sections 5–7).	The Coastal Process Effects Assessment incorporated bathymetric surveys, sediment investigations, seabed characterisation and coastal process analysis to evaluate potential effects on sediment transport pathways, shoreline stability, beach morphology and dune systems. The assessment concluded that the extraction area is located beyond the depth of closure and outside the active nearshore sediment transport system, such that significant effects on beaches, dunes, shoreline resilience and coastal hazard protection functions are not expected.
NZCA-06	Mortality and disturbance of protected cup corals is unacceptable. NZCA strongly disagrees with aspects of MBL's coral assessment and supports DOC's technical advice that cup corals provide ecological value. NZCA questions recovery assumptions and the adequacy of the Cup Coral Management Plan. Pages 6–8.	NIWA; J.Beaumont	Assessment of Scleractinian Cup Coral Effects (Attachment 21) – Effects Assessment and Conclusions (Sections 4–5). Cup Coral Management Plan (Attachment 30). Recommended Wildlife Approval Conditions (Attachment 35). J.Beaumont's statement of evidence dated 12 August 2026.	The application includes dedicated investigations into the distribution, abundance, ecology and recovery potential of protected cup coral species. The Cup Coral Assessment concluded that while direct effects may occur within the extraction footprint, population-level effects on cup corals are unlikely. These findings are supported by the Cup Coral Management Plan, monitoring requirements and proposed Wildlife Approval Conditions specifically developed to manage effects on protected coral species and provide ongoing regulatory oversight. MBL defer to J.Beaumont's statement of evidence, which concludes that the proposed sand extraction will have minor to negligible population-level effects on Schedule 7 cup corals, with suitable habitat extending well beyond the extraction area. She finds that the strengthened Cup Coral Management Plan, improved survey methods and adaptive management framework provide robust protection for cup corals throughout the life of the project.
NZCA-07	Potential adverse effects on marine mammals. NZCA relies on recent studies indicating that Te Ākau Bream Bay supports nationally significant marine mammal diversity and habitat values. Concerns are raised regarding behavioural disturbance, cumulative stressors, vessel interactions and underwater noise. Pages 7–8.	SLR Consulting NZ; Styles Group; H.McConnell; M.Pine	Assessment of Marine Mammal Effects (Attachment 14) – Environmental Impact Assessment and Conclusions (Sections 4–6). Marine Mammal Management Plan (Attachment 28). H.McConnell's statement of evidence dated 12 June 2026. M.Pine's statement of evidence dated 12 August 2026.	The Marine Mammal Effects Assessment and Underwater Noise Assessment evaluated habitat use, behavioural responses, vessel activity, underwater noise and potential cumulative effects on marine mammals. These assessments concluded that significant adverse population-level effects on marine mammals are unlikely. The Marine Mammal Management Plan and Wildlife Approval Conditions provide additional safeguards through monitoring, operational protocols and management responses where necessary. MBL defer to H. McConnell's statement of evidence on Marine Mammals. Additionally, MBL defer to M.Pine's statement of evidence on underwater acoustics.
NZCA-08	Potential effects on tara iti, threatened seabirds and shorebirds. NZCA emphasises the importance of Te Ākau Bream Bay for nationally threatened seabirds and shorebirds, including tara iti, and considers the area to be of high conservation value. Pages 8–9.	NIWA; D.Thompson	Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects and Conclusions (Sections 4–5). D.Thompson's statement of evidence dated 12 August 2026.	The Seabirds and Shorebirds Assessment specifically evaluated the distribution, habitat use, feeding ecology and potential exposure pathways for tara iti and other threatened bird species. The assessment considered prey availability, habitat connectivity, sediment plume effects and vessel activity and concluded that significant adverse population-level effects are unlikely. Proposed Wildlife Approval Conditions and monitoring requirements provide additional safeguards for protected bird species. MBL defer to D.Thompson's statement of evidence for further context.
NZCA-09	Potential adverse effects on scallop recovery and benthic shellfish communities. NZCA notes that the proposed extraction area overlaps	R.O. Boyd; Bioresearches Group; S.West	Assessment of Fish and Fisheries Effects (Attachment 16) – Potential Sand Dredging Effects and Conclusions (Sections 5–	The Fisheries Effects Assessment and Benthic Ecology Assessment specifically considered scallop populations, shellfish resources, habitat availability and ecological recovery processes. The assessments concluded that while

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	with part of the recovering SCA 1 scallop fishery and considers habitat degradation a key risk to scallop recovery. Pages 9–10.		7). Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8). S.West's statement of evidence dated 12 August 2026.	localised disturbance will occur within the extraction footprint, significant adverse effects on wider scallop populations, shellfish communities and fisheries productivity are unlikely. Monitoring of benthic communities and fisheries resources is proposed to verify recovery and environmental performance throughout operations. Additionally, MBL defer to S.West's statement of evidence on Benthic Ecology.
NZCA-10	Monitoring framework lacks meaningful triggers and consequences. NZCA submits that monitoring programmes are insufficient because they lack clear thresholds requiring operational change or cessation of activities. Page 10.	Planning Team; Relevant Technical Experts	Environmental Monitoring Management Plan (Attachment 29) – Monitoring, Reporting and Adaptive Management Framework. Recommended Resource Consent Conditions (Attachment 26) – Monitoring, Review and Adaptive Management Conditions.	The proposed Environmental Monitoring Management Plan includes monitoring, reporting, review and adaptive management provisions across multiple environmental disciplines, including bathymetry, benthic ecology, fisheries, marine mammals and water quality. The framework incorporates management responses, certification requirements and review mechanisms designed to ensure that monitoring results can inform operational decision-making where appropriate. MBL considers that the monitoring framework provides a robust and enforceable mechanism for environmental management.
NZCA-11	Economic justification for the proposal is flawed. NZCA refers to external economic analyses asserting that alternative sources of sand and manufactured sand reduce the need for marine sand extraction and questions the conclusions reached in MBL's economic assessment. Page 10.	M.E Consulting; Paul Donoghue; L.McIlrath	Assessment of Economic Effects (Attachment 18) – Supply Assessment, Demand Outlook, Alternative Supply Considerations and Economic Benefits (Sections 3–6). Concrete Suitability Statement (Attachment 20). L.McIlrath statement of evidence dated 12 August 2026.	The Economic Effects Assessment evaluated future demand for concrete-grade sand, supply constraints, alternative sources and projected growth requirements across the upper North Island. The assessment concluded that a long-term supply deficit is expected to emerge under projected growth scenarios and that alternative sources alone are unlikely to fully satisfy future demand. The proposal would contribute to maintaining a secure and diversified supply of construction materials required for housing, infrastructure and economic development. Additionally, MBL defer to L.McIlrath's statement of evidence on Economics.
NZCA-12	Treaty obligations and Patuharakeke interests have not been adequately recognised. NZCA highlights section 4 Conservation Act responsibilities and adopts concerns raised by Patuharakeke regarding rangatiratanga, kaitiakitanga, mana moana, customary rights and cultural effects. Pages 10–12.	Cultural Advisors; Planning Team	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22). Draft CIA – Patuharakeke Te Iwi Trust Board (Attachment 23). CIA – Ngātiwai Trust Board (Attachment 24).	The application includes multiple Cultural Impact Assessments, extensive tangata whenua engagement and consideration of cultural values, mana whenua relationships, customary interests and kaitiakitanga responsibilities. MBL acknowledges that differing views exist amongst tangata whenua groups regarding the proposal and the appropriate management of Te Ākau/Bream Bay. The application presents those views alongside the proposed cultural monitoring, engagement and management provisions for consideration by the Expert Panel.
NZCA-13	The proposal is inconsistent with national biodiversity strategies and should be declined. NZCA concludes that the proposal is inconsistent with Te Mana o Te Taiao and Action for Nature biodiversity objectives and therefore should not proceed. Pages 12–13.	Planning Team; Relevant Experts	AEE – Statutory Assessment (NZCPS, Te Mana o Te Taiao and biodiversity provisions). Assessment of Benthic Ecology Effects (Attachment 12) – Ecological Conclusions (Section 8).	The application has been supported by specialist assessments of biodiversity values, protected species, ecological functioning and environmental effects. MBL's position is that the proposal can proceed while maintaining biodiversity values through the proposed mitigation measures, management plans, monitoring requirements and Wildlife Approval Conditions. The assessment concludes that significant adverse biodiversity outcomes are unlikely and that the proposal can be appropriately managed within the relevant statutory framework.
30. Minister for Māori Crown Relations: Te Arawhiti (Hon Tama Potaka)				
MCR-01	Support for the application subject to consideration of relevant Māori views. The Minister supports the application but notes that the Expert Panel should carefully consider comments received from relevant iwi, hapū, Treaty settlement entities and Māori groups identified through the section 18 process and subsequent Panel directions.	Planning Team; Cultural Advisors	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Consultation, Cultural Values and Recommendations. Draft CIA – Patuharakeke Te Iwi Trust Board (Attachment 23). CIA – Ngātiwai Trust Board (Attachment 24). AEE – Consultation and Engagement Record.	The application includes engagement with tangata whenua groups and multiple Cultural Impact Assessments addressing cultural values, customary interests and tangata whenua relationships with Te Ākau.
MCR-02	The Expert Panel should have regard to the Ngāti Manuhiri coastal statutory acknowledgement. The Minister encourages the Panel to recognise and consider the relevance of the Ngāti Manuhiri coastal statutory acknowledgement when assessing the proposal.	Planning Team; Cultural Advisors	AEE – Statutory Assessment (Treaty Settlement, Statutory Acknowledgement and Mana Whenua Provisions). Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22).	The application identifies relevant iwi authorities, Treaty settlement entities and customary interests. The Panel will ultimately determine the weight to be given to any statutory acknowledgements and associated Treaty settlement matters.
31. Concrete New Zealand Incorporated				
CNZ-01	Marine sand is a critical mineral and the project provides regional and national benefits. Concrete NZ notes that aggregate and sand are included on New Zealand's Critical Minerals List and considers the Bream Bay proposal capable of delivering significant regional and national benefits through supply of essential construction materials. Pages 3–4.	M.E Consulting; Planning Team	Assessment of Economic Effects (Attachment 18) – Demand Outlook, Supply Assessment and Economic Benefits (Sections 3–6).	Concrete NZ supports the conclusions of the Economic Effects Assessment regarding the strategic importance of marine sand supply for future infrastructure, housing and construction demand.
CNZ-02	Auckland relies heavily on marine sand for concrete production. Concrete NZ notes that more than half of New Zealand's concrete production occurs in Auckland and that approximately 90% of Auckland's concrete sand demand is currently met through marine sand due to its favourable properties and limited availability of alternative natural sand sources. Pages 4–5.	Paul Donoghue; M.E Consulting	Concrete Suitability Statement (Attachment 20). Assessment of Economic Effects (Attachment 18) – Demand Outlook and Supply Assessment (Sections 3–4). P.Donoghue's statement of evidence dated 12 August 2026.	Concrete NZ supports MBL's evidence regarding the importance of marine sand as a key input into Auckland's concrete production industry.
CNZ-03	The proposal could become a significant source of Auckland's future marine sand supply. Concrete NZ notes that the proposed extraction volumes could potentially provide a substantial proportion of Auckland's future marine sand requirements and therefore support future infrastructure and development needs. Page 5.	M.E Consulting; Paul Donoghue	Assessment of Economic Effects (Attachment 18) – Supply Assessment, Future Supply Constraints and Economic Benefits (Sections 4–6).	Concrete NZ agrees with MBL's assessment that future demand for suitable concrete-grade sand is likely to increase and that additional supply sources will be required.
CNZ-04	Correction regarding manufactured sand. Concrete NZ supports the project but notes that parts of Attachment 20 overstate limitations associated with manufactured sand. The submission states that high-quality concrete can be produced using manufactured sand and provides examples of Auckland concrete plants currently using predominantly manufactured sand. Page 5.	Paul Donoghue	Concrete Suitability Statement (Attachment 20). P.Donoghue's statement of evidence dated 12 August 2026.	Concrete NZ generally supports the proposal but provides additional industry context regarding the increasing use of manufactured sand in some concrete production applications. This does not alter its support for the project.

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CNZ-05	Marine-dredged sand remains an important component of New Zealand's aggregate supply chain. Concrete NZ submits that all potential sources of aggregate, sand and gravel should remain available for responsible extraction, including carefully selected marine environments where effects can be appropriately managed. Pages 4–6.	M.E Consulting; Planning Team	Assessment of Economic Effects (Attachment 18) – Supply Assessment and Alternative Supply Considerations (Sections 3–4). P.Donoghue's statement of evidence dated 12 August 2026.	Concrete NZ considers marine sand extraction to be an important component of New Zealand's future construction materials supply chain where environmental effects can be appropriately managed.
CNZ-06	The proposal supports infrastructure delivery, housing growth and economic development. Concrete NZ states that concrete underpins roads, bridges, tunnels, water infrastructure, renewable energy projects, housing and climate resilience infrastructure and that secure sand supply is important to achieving these outcomes. Pages 2–6.	M.E Consulting; Planning Team	Assessment of Economic Effects (Attachment 18) – Regional and National Economic Benefits (Section 6). L.McIlrath statement of evidence dated 12 August 2026.	Concrete NZ supports MBL's position that the proposal will assist in maintaining long-term supply of construction materials necessary for infrastructure and development across Auckland and northern New Zealand.
32. André and Robin LaBonté (LaBonté Coastal Consultants Limited)				
ALR-01	Insufficient baseline coastal process data and uncertainty regarding closure depth. The submitters contend that Bream Bay lacks sufficient long-term bathymetric, shoreline profile and sediment transport data to confidently determine offshore closure depth and predict coastal effects. They argue that reliance on limited survey profiles and Hallermeier closure depth methodology creates uncertainty regarding sediment connectivity between the extraction area and the shoreline.	Tonkin + Taylor	Assessment of Coastal Process Effects (Attachment 8) – Existing Environment, Closure Depth Assessment, Sediment Transport Assessment and Coastal Process Effects (Sections 3–6).	The Coastal Process Effects Assessment was informed by extensive bathymetric surveys, sediment sampling, geophysical investigations, wave climate analysis, coastal process assessment and review of available historical information. Multiple lines of evidence were used to evaluate closure depth, sediment transport processes and connectivity between the extraction area and the nearshore coastal environment. The assessment concluded that the extraction area is located beyond the depth of closure and outside the active nearshore sediment transport system. While uncertainty is inherent in all coastal environments, MBL considers that the available data provides a robust basis for assessing potential coastal process effects and is supported by proposed monitoring and adaptive management provisions.
ALR-02	Potential shoreline erosion and loss of sand from the coastal system. The submitters argue that extraction of sand from the seabed may remove sediment from the wider coastal system and could contribute to long-term shoreline recession, dune erosion and adverse effects on coastal landforms similar to effects they believe have occurred at Mangawhai and Pakiri.	Tonkin + Taylor; Brown NZ; R.Reinen-Hamill and B.Beetham	Assessment of Coastal Process Effects (Attachment 8) – Coastal Process Effects and Conclusions (Sections 5–7). R.Reinen-Hamill and E.Beetham's joint statement of evidence dated 12 August 2026.	The Coastal Process Effects Assessment specifically evaluated the potential for extraction activities to influence shoreline stability, beach morphology, dune systems and sediment transport pathways. The assessment concluded that the proposed extraction area is sufficiently offshore that significant effects on beaches, dunes and coastal landforms are not expected. The assessment further concluded that the proposal is unlikely to contribute to shoreline recession, dune erosion or degradation of coastal hazard protection functions. These conclusions are supported by the proposed bathymetric monitoring programme, control area comparisons and adaptive management framework. MBL defer to Mr Reinen-Hamill and Mr Beetham's joint statement of evidence in relation to Coastal Processes.
ALR-03	Sediment grain size, sand waves and seabed features indicate active sediment movement. The submitters contend that observed sand waves, shell hash, coarse sediments and seabed bedforms within the extraction area demonstrate that sediment remains mobile and therefore connected to the nearshore coastal system.	Tonkin + Taylor; Bioresearches	Assessment of Coastal Process Effects (Attachment 8) – Existing Environment, Seabed Characteristics and Sediment Transport Assessment (Sections 3–5).	The assessment considered seabed morphology, sediment characteristics, bathymetric features and sediment transport processes within the extraction area and wider receiving environment. While local sediment mobility occurs within offshore marine environments, the assessment concluded that the observed seabed features do not demonstrate significant connectivity with the active nearshore sediment transport system responsible for maintaining beaches and dunes. MBL's position remains that the extraction area is located beyond the depth at which significant shoreline-influencing sediment exchange occurs.
ALR-04	Water quality, turbidity and spoil return effects. The submitters challenge the water quality assessment and question whether turbidity monitoring and plume predictions accurately represent actual dredging effects. They also raise concerns regarding repeated return of unsuitable material to the seabed and cumulative effects on benthic habitats.	SLR; Bioresearches; S.West; E.Jones	Assessment of Water Quality Effects (Attachment 9) – Sediment Plume Assessment, Water Quality Effects and Conclusions (Sections 4–7). Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects (Sections 6–7). S.West's statement of evidence dated 12 August 2026. E.Jones statement of evidence dated 12 August 2026.	The Water Quality Effects Assessment evaluated sediment plume generation, suspended sediment concentrations, spoil return processes, plume dispersion and potential ecological effects. The assessment concluded that water quality effects will be temporary, localised and rapidly dissipated within the receiving environment. Sediment plume modelling and ecological assessments indicate that significant adverse effects on benthic habitats, ecological functioning and water quality are unlikely. These conclusions are supported by proposed water quality monitoring and environmental management provisions. MBL defer to E.Jones statement of evidence on Water Quality. Additionally, MBL defer to S.West's statement of evidence on Benthic Ecology.
ALR-05	Monitoring framework is inadequate to identify future shoreline impacts. The submitters consider the proposed bathymetric monitoring programme insufficient to distinguish between natural variability and extraction-induced change and contend that effects may not become apparent until significant changes have already occurred.	Tonkin + Taylor; Planning Team	Environmental Monitoring Management Plan (Attachment 29) – Bathymetric Monitoring, Monitoring Framework and Adaptive Management Procedures. Recommended Resource Consent Conditions (Attachment 26) – Monitoring, Review and Adaptive Management Conditions.	The Environmental Monitoring Management Plan includes a comprehensive bathymetric monitoring programme designed to assess seabed change, extraction performance and broader environmental responses over time. Monitoring is supported by reporting obligations, review mechanisms, certification requirements and adaptive management provisions. MBL's position is that the monitoring framework provides a robust mechanism for identifying unexpected environmental responses and distinguishing operational effects from natural variability to the extent reasonably practicable in a dynamic coastal environment.
33. Te Ohu Kaimoana (Māori Fisheries Trust)				
TOK-01	Project is inconsistent with the Māori Fisheries Settlement and should be declined under section 7 of the FTAA. Te Ohu Kaimoana argues that granting approval could undermine fisheries settlement rights and therefore be inconsistent with Treaty settlement obligations.	Planning Team; Cultural Advisors	AEE – Statutory Assessment (Treaty Settlement, Fisheries Settlement and FTAA Considerations). Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22).	MBL acknowledges the significance of Māori fisheries settlement interests and customary fishing rights. The application includes assessment of fisheries resources, customary values and tangata whenua interests through specialist fisheries assessments, Cultural Impact Assessments and engagement processes. MBL's position is that the proposal does not extinguish or prevent the exercise of fisheries settlement rights and that environmental effects can be appropriately managed through the proposed consent conditions, management plans and monitoring framework. Whether the proposal is consistent with the relevant statutory provisions is ultimately a matter for determination by the Expert Panel.
TOK-02	Potential effects on taonga species, wāhi tapu and the health of Tangaroa. Te Ohu Kaimoana emphasises the cultural significance of the marine environment and the need to recognise Māori relationships with the moana and associated taonga.	Cultural Advisors; Ecological Experts	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Cultural Values, Kaitiakitanga and Assessment of Effects. Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A).	The application recognises the cultural significance of the marine environment, taonga species and the relationship of tangata whenua with Tangaroa. Multiple Cultural Impact Assessments and specialist ecological assessments considered potential effects on fisheries resources, marine habitats, protected species and ecosystem health. MBL acknowledges that some tangata whenua groups oppose marine sand extraction as a matter of principle, while maintaining that the proposed management framework provides appropriate mechanisms for recognising and managing cultural and environmental values.
TOK-03	Insufficient assessment of customary non-commercial fisheries interests and rohe moana. Te Ohu Kaimoana submits that the	Cultural Advisors; Fisheries Expert; R.O.Boyd	Assessment of Fish and Fisheries Effects (Attachment 16) – Existing Fisheries Environment, Customary Fisheries and Assessment of Effects (Sections 4–6). Cultural Impact	The Fisheries Effects Assessment considered commercial, recreational and customary fisheries values, including the potential effects of extraction activities on fisheries resources and marine habitats. Cultural Impact Assessments also addressed customary relationships with the marine environment and customary use values.

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	application does not adequately assess effects on customary fisheries rights, gazetted rohe moana and tangata tiaki responsibilities.		Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22). R.O. Boyd's statement of evidence dated 12 August 2026.	MBL considers that the application provides a comprehensive assessment of fisheries-related effects and includes monitoring and management measures designed to verify environmental performance and resource condition throughout operations. Additionally, MBL defer to R.O.Boyd's statement of evidence on Fish and Fisheries.
TOK-04	Insufficient engagement with Tangata Tiaki/Kaitiaki. Te Ohu Kaimoana states that direct engagement should occur with relevant tangata tiaki and kaitiaki appointed within gazetted customary fishing areas.	Planning Team; Cultural Advisors; C.McCallum	AEE – Consultation and Engagement Record. Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Consultation and Engagement Process. C.McCallum's statement of evidence dated 12 August 2026	MBL undertook extensive engagement with tangata whenua groups, iwi authorities, hapū organisations and cultural representatives throughout project development. The application records the engagement undertaken and the feedback received. MBL acknowledges that views differ regarding the extent and nature of engagement that should have occurred and remains committed to ongoing engagement with tangata whenua and customary fisheries representatives throughout the life of the project should consent be granted.
TOK-05	Potential effects on Māori commercial fisheries settlement interests and quota value. Te Ohu Kaimoana argues that fishing operations overlap with the project area and that any reduction in fish stocks or fishery productivity could affect quota value and Māori settlement assets.	R.O. Boyd; M.E Consulting; R.O.Boyd	Assessment of Fish and Fisheries Effects (Attachment 16) – Commercial Fisheries, Assessment of Effects and Conclusions (Sections 5–7). R.O. Boyd's statement of evidence dated 12 August 2026.	The Fisheries Effects Assessment evaluated potential effects on fish populations, shellfish resources, benthic habitats and fisheries productivity. The assessment concluded that significant adverse population-level effects on fisheries resources are unlikely and that effects will largely be confined to the extraction footprint. Accordingly, MBL considers that significant adverse effects on the productivity of fisheries resources supporting quota value and settlement assets are unlikely. These conclusions are supported by the proposed fisheries monitoring programme and adaptive management framework. Additionally, MBL defer to R.O.Boyd's statement of evidence on Fish and Fisheries.
TOK-06	Cumulative effects of increasing restrictions on commercial fishing areas. Te Ohu Kaimoana notes that marine protection measures, fisheries restrictions and other spatial controls are progressively reducing available fishing grounds and that the proposal may contribute to cumulative constraints.	R.O. Boyd; Planning Team	Assessment of Fish and Fisheries Effects (Attachment 16) – Commercial Fisheries and Assessment of Effects (Sections 5–6). AEE – Cumulative Effects Assessment. R.O. Boyd statement of evidence dated 12 August 2026.	The application includes consideration of cumulative effects across fisheries resources, benthic ecology, coastal processes and the wider marine environment. The proposed extraction area represents a relatively small component of the wider marine environment and is not proposed to be permanently closed to fishing activity. MBL acknowledges the broader concerns raised regarding cumulative spatial pressures on fisheries resources, but considers that the proposal is unlikely to result in significant adverse cumulative effects on commercial fishing opportunities or fisheries productivity. Additionally, MBL defer to R.O.Boyd's statement of evidence on Fish and Fisheries.
34. Ruakākā Residents and Ratepayers Association Inc. (RRRA)				
RRRA-01	Protection of beach amenity, recreation and community values. The Association emphasises the importance of Bream Bay for walking, swimming, fishing, surfing, horse riding, birdwatching, camping, waka ama, paddle sports and tourism activities. It considers the beach a significant community asset that should be protected from potential adverse effects.	Brown NZ; MetOcean Solutions; Planning Team	Assessment of Surf Break Effects (Attachment 17) – Assessment of Effects and Conclusions (Sections 5–7). Assessment of Navigational Safety Effects (Attachment 19).	The application recognises the importance of Bream Bay's beaches and coastal environment for recreation, community wellbeing and public enjoyment. Specialist assessments of coastal processes, recreation, landscape and natural character, navigation safety and surf breaks were undertaken to evaluate potential effects on these values. The proposed extraction area is located approximately 4.7 km offshore and the assessments conclude that significant adverse effects on beach amenity, recreational use and community values are unlikely.
RRRA-02	Potential impacts on recreational fishing and shellfish gathering. The submission raises concerns regarding fish stocks, shellfish resources and food gathering opportunities, including potential effects on Mair Bank shellfish resources.	R.O. Boyd; SLR	Assessment of Fish and Fisheries Effects (Attachment 16) – Existing Fisheries Environment, Customary and Recreational Fisheries, Assessment of Effects and Conclusions (Sections 4–7). R.O. Boyd's statement of evidence dated 12 August 2026.	The Fisheries Effects Assessment evaluated potential effects on fish populations, shellfish resources, benthic habitats and fisheries productivity. The assessment concluded that effects will largely be confined to the extraction footprint and that significant adverse population-level effects on fisheries resources are unlikely. Potential effects on recreational fishing and shellfish gathering opportunities, including resources within the wider Bream Bay environment, were considered and are not expected to be significant. The proposed fisheries monitoring programme provides an ongoing mechanism to verify environmental performance throughout operations. Additionally, MBL defer to R.O.Boyd's statement of evidence on Fish and Fisheries.
RRRA-03	Potential impacts on marine ecosystems and seabed habitats. The Association considers seabed sand to be an important ecological resource and expresses concern regarding habitat disturbance and long-term ecological effects.	Bioresearches; NIWA	Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8).	Detailed investigations of benthic ecology, marine habitats, ecological functioning and biodiversity values were undertaken within and surrounding the extraction area. These assessments concluded that while localised disturbance will occur within the extraction footprint, significant adverse ecosystem-level effects are unlikely and ecological recovery is expected over time. These conclusions are supported by the Environmental Monitoring Management Plan and proposed benthic monitoring programme.
RRRA-04	Risk of beach erosion and impacts on dunes. The Association considers there is uncertainty regarding whether extraction could affect beach stability, shoreline processes and dune systems.	Tonkin + Taylor; R.Reinen-Hamill and B.Beetham	Assessment of Coastal Process Effects (Attachment 8) – Sediment Transport Assessment, Coastal Process Effects and Conclusions (Sections 4–7). R.Reinen-Hamill and E.Beetham's joint statement of evidence dated 12 August 2026.	The Coastal Process Effects Assessment incorporated bathymetric surveys, sediment investigations, seabed characterisation and coastal process analysis to evaluate potential effects on sediment transport pathways, shoreline stability, beach morphology and dune systems. The assessment concluded that the extraction area is located beyond the depth of closure and outside the active nearshore sediment transport system, such that significant effects on beaches, dunes and coastal landforms are not expected. These conclusions are supported by proposed bathymetric monitoring, control area comparisons and adaptive management provisions throughout the life of the project. MBL defer to Mr Reinen-Hamill and Mr Beetham's joint statement of evidence in relation to Coastal Processes.
RRRA-05	Reliance on and support for Bream Bay Guardians evidence. The Association endorses the BBG submission and agrees with the concerns raised by BBG regarding environmental effects and project risks.	Multiple Experts	AEE – Overall Assessment of Effects and Cumulative Effects Assessment. Assessment of Coastal Process Effects (Attachment 8) (Sections 5–7). Assessment of Benthic Ecology Effects (Attachment 12) (Sections 6–8).	MBL acknowledges that RRRA has adopted concerns raised by Bream Bay Guardians regarding coastal processes, ecology, fisheries and project need. These matters have been comprehensively addressed through specialist technical assessments, Requests for Information, supplementary evidence and the proposed management framework. MBL's position remains that the available scientific evidence supports the conclusion that significant adverse environmental effects are unlikely and can be appropriately managed through the proposed consent conditions and monitoring programmes.
RRRA-06	Application should be declined. The Association considers that the weight of evidence and level of community opposition justify refusal of the proposal.	Planning Team	AEE – Overall Assessment of Effects and Statutory Assessment. Assessment of Economic Effects (Attachment 18).	The application is supported by a comprehensive suite of specialist assessments addressing coastal processes, benthic ecology, fisheries, water quality, marine mammals, seabirds, recreation, navigation, cultural values and economics. Collectively, these assessments conclude that environmental effects can be appropriately avoided, remedied or mitigated through the proposed consent conditions, management plans and monitoring framework. MBL's position is that the proposal can proceed while maintaining the environmental, recreational and cultural values of Te Ākau/Bream Bay and delivering significant regional and national benefits.
35. Minister for Hunting and Fishing				
MHF-01	Support for projects that benefit regional New Zealand. The Minister for Hunting and Fishing advised that he has no specific comments on	Planning Team; M.E Consulting	Attachment 18– Assessment of Economic Effects (M.E Consulting): Sections 4–8 (Regional Benefits, Construction	The comment is supportive and aligns with MBL's assessment that the project will provide regional and national economic benefits through supporting concrete supply, infrastructure delivery and construction activity.

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	the application and is generally supportive of projects that provide benefits to regional New Zealand.		Sector Demand and Economic Contribution).AEE – Project Benefits Assessment.	
36. Lang Cove Residents Association Inc.				
LCRA-01	Overall opposition to the proposal and request that consent be declined. LCRA opposes the application in its entirety and states that none of its 80-plus members who expressed a view supported the proposal. LCRA considers the project presents unacceptable environmental, community, amenity, cultural and economic risks to Bream Bay.	Planning Team; Relevant Technical Experts; L.McIlrath	AEE – Overall Assessment of Effects and Statutory Assessment. Assessment of Economic Effects (Attachment 18) – Regional and National Economic Benefits (Section 6). L.McIlrath statement of evidence dated 12 August 2026.	The application is supported by a comprehensive suite of specialist assessments addressing coastal processes, benthic ecology, fisheries, water quality, marine mammals, seabirds, recreation, cultural values and economics. Collectively, these assessments conclude that environmental effects can be appropriately avoided, remedied or mitigated through the proposed consent conditions, management plans and monitoring framework. MBL's position is that the proposal can proceed while maintaining the environmental, recreational and cultural values of Te Ākau/Bream Bay while delivering significant regional and national benefits. Additionally, MBL defer to L.McIlrath's statement of evidence on Economics.
LCRA-02	Use of the Fast-track Approvals Act process is inappropriate for a project of this scale and sensitivity. LCRA submits that the process limits public scrutiny and community participation for a project involving large-scale extraction of a non-renewable marine resource, protected species and an applicant with a contested compliance history.	Planning Team; Legal Team	AEE – Statutory Assessment and Consultation Record.	The application has been assessed through the statutory process established by Parliament under the Fast-track Approvals Act. The proposal has been subject to invited comments, Requests for Information, extensive technical review and consideration by the Expert Panel. The appropriateness of the statutory process itself is ultimately a matter determined by the legislation and the Expert Panel rather than MBL.
LCRA-03	The sand resource is finite and non-renewable. LCRA submits that the sand targeted by the proposal is Holocene-age material deposited over thousands of years and that there is no contemporary replenishment mechanism of comparable scale. LCRA says this irreversibility should be central to the Panel's precautionary assessment.	Tonkin + Taylor Ltd; Planning Team	Assessment of Coastal Process Effects (Attachment 8) – Existing Environment, Sediment Budget and Coastal Process Assessment (Sections 3–6).	The application acknowledges that marine sand is a finite resource. The Coastal Process Effects Assessment, Benthic Ecology Assessment and Fisheries Assessment specifically evaluated the environmental implications of extraction and concluded that significant adverse effects on wider coastal processes, ecological functioning and shoreline stability are unlikely. The proposal seeks to utilise a resource that has been assessed as suitable for construction purposes while managing environmental effects through comprehensive monitoring and adaptive management provisions.
LCRA-04	Historic beach photographs and post-Cyclone Gabrielle observations indicate reliance on offshore sand reserves. LCRA relies on historic aerial photographs and local observations to argue that Lang Beach and Ding Bay historically held greater sand volumes, and that recovery after Cyclone Gabrielle occurred because offshore sand reserves remained intact.	Tonkin + Taylor Ltd	Assessment of Coastal Process Effects (Attachment 8) – Existing Environment and Coastal Process Assessment (Sections 3–6).	The Coastal Process Effects Assessment considered shoreline behaviour, sediment transport processes, bathymetric information and coastal system dynamics. While beach morphology naturally responds to storms and changing coastal conditions, the assessment concluded that the extraction area is located beyond the depth of closure and outside the active nearshore sediment transport system. Accordingly, significant effects on beach recovery processes, dune systems and shoreline resilience are not expected.
LCRA-05	Coastal processes and shoreline stability have not been subjected to sufficient independent scrutiny. LCRA compares the proposal to the Pākiri process and submits that Bream Bay has not received the same level of independent peer review or expert conferencing before consent is considered.	Tonkin + Taylor Ltd; Planning Team; R.Reinen-Hamill and B.Beetham	Assessment of Coastal Process Effects (Attachment 8) – Sediment Transport Assessment, Coastal Process Effects and Conclusions (Sections 4–7). R.Reinen-Hamill and E.Beetham's joint statement of evidence dated 12 August 2026.	The coastal process investigations were undertaken by specialist coastal engineers and informed by bathymetric surveys, sediment sampling, geophysical investigations and coastal process analysis. The assessment has also been subject to regulatory review, Requests for Information and scrutiny through the Fast-track process. MBL considers that the coastal process evidence has been thoroughly examined and provides a robust basis for concluding that significant adverse coastal effects are unlikely. MBL defer to Mr Reinen-Hamill and Mr Beetham's joint statement of evidence in relation to Coastal Processes.
LCRA-06	Benthic ecology and marine habitat effects may be understated. LCRA submits that international literature and the Pākiri experience demonstrate that marine aggregate extraction can cause long-term effects on benthic biomass, diversity and habitat recovery, and that MBL's monitoring history should be treated cautiously.	Bioresearches Group; NIWA; S.West	Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8). S.West's statement of evidence dated 12 August 2026.	Detailed investigations of benthic habitats, ecological communities, fisheries resources and marine food web processes were undertaken within and surrounding the extraction area. These assessments considered habitat values, recovery pathways and ecological functioning and concluded that effects will largely be confined to the extraction footprint, with ecological recovery expected over time. Significant adverse ecosystem-level effects are not anticipated and will be further assessed through the proposed monitoring programme. Additionally, MBL defer to S.West's statement of evidence on Benthic Ecology.
LCRA-07	Marine mammal effects may be greater than assessed. LCRA relies on Brough et al. survey material to submit that Te Ākau/Bream Bay is nationally significant habitat for bottlenose dolphins, Bryde's whales, false killer whales and common dolphins, including foraging and nursery habitat.	SLR Consulting NZ; Styles Group; H.McConnell	Assessment of Marine Mammal Effects (Attachment 14) – Environmental Impact Assessment and Conclusions (Sections 4–6). Marine Mammal Management Plan (Attachment 28). H.McConnell's statement of evidence dated 12 June 2026	The Marine Mammal Effects Assessment and Underwater Noise Assessment evaluated habitat use, behavioural responses, underwater noise, vessel activity and cumulative stressors affecting marine mammals. These assessments concluded that significant adverse population-level effects on marine mammals are unlikely. The findings are supported by the Marine Mammal Management Plan, operational protocols, monitoring requirements and proposed Wildlife Approval Conditions. MBL defer to H. McConnell's statement of evidence on Marine Mammals.
LCRA-08	Effects on tara iti, kororā and other threatened or at-risk birds are inadequately assessed. LCRA submits that Bream Bay supports nationally critical, nationally endangered, nationally vulnerable and at-risk bird species, including tara iti, matuku-hūrepo, tūturiwhatu, kororā, shags, terns and migratory shorebirds.	NIWA – Seabird/Shorebird Specialist; Styles Group	Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects and Conclusions (Sections 4–5).	The Seabirds and Shorebirds Assessment specifically evaluated the distribution, habitat use, feeding ecology and potential exposure pathways for tara iti and other threatened bird species. The assessment considered prey availability, habitat connectivity, sediment plume effects and vessel activity and concluded that significant adverse population-level effects are unlikely. Proposed Wildlife Approval Conditions and monitoring requirements provide additional safeguards for protected bird species.
LCRA-09	Turbidity and prey disruption may affect visual foragers and shorebird feeding values. LCRA submits that suspended sediment plumes could reduce prey visibility for tara iti, shags and other visual foragers, and may affect intertidal and subtidal prey availability for migratory shorebirds.	SLR Consulting NZ; NIWA; Bioresearches Group	Assessment of Water Quality Effects (Attachment 9) – Sediment Plume Assessment, Water Quality Effects and Conclusions (Sections 4–7). Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects (Section 4).	The Water Quality Effects Assessment and Seabirds and Shorebirds Assessment considered sediment plume generation, turbidity effects and potential ecological pathways linking water quality changes to prey availability. The assessments concluded that sediment plume effects will be temporary, localised and rapidly dissipated and are unlikely to result in significant adverse effects on prey resources or feeding opportunities for shorebirds and seabirds.
LCRA-10	Compliance history and Pākiri experience raise concerns about future compliance. LCRA submits that MBL's application did not fully disclose the DOC Wildlife Act investigation and formal warnings relating to cup corals at Pākiri, and that Environment Court material raised questions about monitoring and compliance history.	Planning Team; Legal Team; NIWA; J.Beaumont	Environmental Monitoring Management Plan (Attachment 29) – Monitoring, Reporting and Compliance Framework. Recommended Resource Consent Conditions (Attachment 26) – Monitoring and Review Conditions. S.Elstob's statement of evidence dated 12 August 2026.	The current application has been assessed on its own merits and is supported by a comprehensive suite of technical assessments, management plans and proposed consent conditions specific to Te Ākau/Bream Bay. The proposed consent framework includes extensive monitoring, reporting, review and adaptive management provisions designed to verify environmental performance and ensure compliance throughout the life of the project. The Expert Panel's assessment is focused on the environmental effects, mitigation measures and conditions proposed for the current application. MBL defer to S.Elstob's statement of evidence on Pakiri Compliance.

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LCRA-11	Protected cup corals may be adversely affected and pre-extraction surveys may not be fully reliable. LCRA submits that the risk of Wildlife Act breach is inherent because protected scleractinian cup corals are small, cryptic and difficult to detect with certainty before extraction.	NIWA – Cup Coral Specialists; Bioresearches Group; J.Beaumont	Assessment of Scleractinian Cup Coral Effects (Attachment 21) – Effects Assessment and Conclusions (Sections 4–5). Cup Coral Management Plan (Attachment 30). Recommended Wildlife Approval Conditions (Attachment 35). J.Beaumont's statement of evidence dated 12 August 2026.	The application includes dedicated investigations into the distribution, abundance and ecology of protected cup coral species within and around the extraction area. The Cup Coral Assessment evaluated detection methods, survey coverage, recovery potential and population-level effects. These findings informed the Cup Coral Management Plan and proposed Wildlife Approval Conditions, which together provide a comprehensive framework for managing potential effects on protected coral species. MBL also defer to J.Beaumont’s statements of evidence in relation to the assessed ecological significance of cup corals.
LCRA-12	International evidence supports a precautionary approach to marine sand extraction. LCRA refers to international studies and UNEP commentary regarding habitat loss, benthic impacts and coastal tourism effects from marine aggregate extraction.	Planning Team; Technical Experts; S.West	AEE – Overall Assessment of Effects and Statutory Assessment. Assessment of Benthic Ecology Effects (Attachment 12) – Ecological Conclusions (Section 8). S.West's statement of evidence dated 12 August 2026.	MBL acknowledges that precaution is an important consideration in environmental decision-making. The proposal has adopted a precautionary framework through extensive baseline investigations, specialist technical assessments, proposed management plans, monitoring requirements and adaptive management provisions. MBL’s position is that the available evidence supports the conclusion that significant adverse environmental outcomes are unlikely while providing mechanisms to manage uncertainty throughout the life of the project. Additionally, MBL defer to S.West's statement of evidence on Benthic Ecology.
LCRA-13	Community, amenity and recreational values may be adversely affected. LCRA states that Bream Bay beaches are highly valued for swimming, fishing, boating, diving, walking, surfing and family recreation, and that residents have longstanding personal and community connections to the coast.	Brown NZ Ltd; MetOcean Solutions; Captain Bruce Goodchild; Planning Team; B.Beamsley	Assessment of Surf Break Effects (Attachment 17) – Assessment of Effects and Conclusions (Sections 5–7). Assessment of Navigational Safety Effects (Attachment 19) – Risk Assessment and Conclusions (Sections 4–6). B.Beamsley statement of evidence dated 12 August 2026.	The application includes assessments of recreation, surf breaks, landscape and natural character, navigation safety and coastal processes. The proposed extraction area is located approximately 4.7 km offshore and the assessments conclude that significant adverse effects on swimming, surfing, boating, fishing, walking and other recreational activities are unlikely. Public access to beaches and recreational use of the coastline will continue throughout the life of the project. Dr Brett Beamsley that modelling shows the proposed extraction will have negligible to imperceptible effects on surf breaks, wave conditions and recreational wave amenity throughout Te Ākau Bream Bay. He finds the concerns raised by submitters are not supported by the modelling evidence.
LCRA-14	If consent is granted, LCRA seeks shorter duration, lower extraction volumes, independent monitoring and enforceable cessation triggers. LCRA seeks a maximum 5-year consent, no Stage 2 extraction without further consent, independent monitoring, mandatory pre-extraction surveys and enforceable cessation triggers if adverse effects are detected.	Planning Team; Technical Experts	Environmental Monitoring Management Plan (Attachment 29) – Monitoring, Reporting and Adaptive Management Framework. Recommended Resource Consent Conditions (Attachment 26) – Review, Monitoring and Adaptive Management Conditions.	The proposed consent framework includes extensive monitoring, reporting, review and adaptive management provisions designed to verify environmental performance throughout operations. Matters such as consent duration, extraction limits, review mechanisms and operational triggers are ultimately matters for determination by the Expert Panel having regard to the evidence before it. MBL considers that the proposed conditions provide a robust framework for environmental management and regulatory oversight.
LCRA-15	Economic benefits are overstated and local economic costs are understated. LCRA submits that Bream Bay receives no meaningful local economic benefit, while Northland’s tourism economy, beach amenity and community wellbeing bear the risk. LCRA’s economic annex states that direct local benefit is negligible and that tourism revenue may be at risk if beach amenity is degraded.	M.E. Consulting; Planning Team	Assessment of Economic Effects (Attachment 18) – Regional and National Economic Benefits (Section 6). L.McIlrath statement of evidence dated 12 August 2026.	The Economic Effects Assessment evaluated future demand for concrete-grade sand, supply constraints, construction sector requirements and broader economic benefits associated with maintaining a secure supply of construction materials. The assessment concluded that the proposal would provide significant regional and national economic benefits through supporting housing, infrastructure and economic development. MBL considers that these benefits have been comprehensively assessed alongside potential environmental and social effects.
LCRA-16	Tourism and beach amenity impacts could outweigh project benefits. LCRA states that Waipū Cove and Lang Beach are important tourism assets and that degradation of beach amenity, visual character, surf quality or water clarity could adversely affect local businesses and visitors.	M.E. Consulting; Brown NZ Ltd; MetOcean Solutions; SLR Consulting NZ; B.Beamsley	Assessment of Economic Effects (Attachment 18) –Sand Market, Outlook, Avoid Costs and Benefits (Section 3-4). Assessment of Surf Break Effects (Attachment 17) – Assessment of Effects and Conclusions (Sections 5–7). B.Beamsley statement of evidence dated 12 August 2026.	Specialist assessments of recreation, coastal amenity, landscape, natural character and coastal processes concluded that significant adverse effects on beach quality, surf conditions, recreation and visitor experiences are unlikely. Accordingly, the application does not identify a credible mechanism by which the proposal would result in significant adverse effects on tourism activity or beach-related economic values. Dr Brett Beamsley that modelling shows the proposed extraction will have negligible to imperceptible effects on surf breaks, wave conditions and recreational wave amenity throughout Te Ākau Bream Bay. He finds the concerns raised by submitters are not supported by the modelling evidence.
LCRA-17	Alternative sand supply sources may avoid the need for marine extraction. LCRA refers to alternative sand production capacity and manufactured sand technologies and submits that the economic necessity of imposing risks on Bream Bay has not been established.	M.E. Consulting; Paul Donoghue	Assessment of Economic Effects (Attachment 18) – Alternative Supply Considerations and Supply Assessment (Sections 3–4). Concrete Suitability Statement (Attachment 20). P.Donoghue's statement of evidence dated 12 August 2026.	The Economic Effects Assessment and Concrete Suitability Statement considered alternative supply sources including terrestrial quarries, manufactured sand and existing marine extraction operations. The assessment concluded that alternative sources alone are unlikely to meet projected future demand and that marine sand remains an important component of the construction materials supply chain. The proposal would contribute to maintaining long-term supply security for housing and infrastructure development. Additionally, MBL defer to P.Donoghue’s statement of evidence on Concrete Suitability.
LCRA-18	Further information should be required before determination. LCRA identifies evidence gaps relating to local tourism economics, MBL revenue, turbidity plume peer review, coastal property values, alternative supply and visual/acoustic amenity effects.	Planning Team; Relevant Technical Experts	AEE – Overall Assessment of Effects. Assessment of Economic Effects (Attachment 18). Environmental Monitoring Management Plan (Attachment 29).	The application has been supported by extensive technical investigations and has been supplemented through multiple Requests for Information, expert reviews and additional reporting throughout the Fast-track process. MBL considers that the Expert Panel now has the benefit of a comprehensive evidential record across coastal processes, ecology, fisheries, cultural values, recreation and economics on which to make its determination.
37. Parliamentary Commissioner for the Environment				
PCE-01	Need for Bream Bay sand has not been adequately demonstrated. The Commissioner questions whether Auckland requires an additional marine sand source and suggests alternative supplies, including Kaipara Harbour and onshore sources, may be sufficient. He recommends further scrutiny of assumptions underpinning the economic assessment.	M.E Consulting; Paul Donoghue; L.McIlrath	Assessment of Economic Effects (Attachment 18) – Demand Outlook, Supply Assessment and Alternative Supply Considerations (Sections 3–4). Concrete Suitability Statement (Attachment 20). L.McIlrath statement of evidence dated 12 August 2026. T.Sawyer’s statement of evidence dated 12 August 2026.	The Economic Effects Assessment evaluated future demand for concrete-grade sand, existing supply sources, projected supply constraints and the suitability of alternative materials, including terrestrial quarry sources and existing marine sand supplies. The assessment concluded that a long-term supply deficit is expected to emerge under projected growth scenarios and that alternative sources alone are unlikely to fully satisfy future demand. The proposal would contribute to maintaining a secure and diversified supply of construction materials required for housing, infrastructure and economic development across the upper North Island. Furthermore, MBL defer to L.McIlrath's statement of evidence on Economics and T.Sawyer’s statement of evidence in respect to alternate sand sources such as manufactured sand.
PCE-02	Economic assessment does not adequately account for environmental and social costs. The Commissioner considers tourism, recreation, fisheries and environmental values should be more fully weighed against claimed economic benefits.	M.E Consulting; Planning Team; L.McIlrath; R.O.Boyd	Assessment of Economic Effects (Attachment 18) – Regional and National Economic Benefits (Section 6). AEE – Overall Assessment of Effects and Cost-Benefit Assessment. L.McIlrath statement of evidence dated 12 August 2026 and R.O. Boyd's statement of evidence dated 12 August 2026.	The application does not rely solely on economic benefits. It includes detailed assessments of coastal processes, benthic ecology, fisheries, water quality, marine mammals, seabirds, recreation, cultural values and social effects. The Economic Effects Assessment forms one component of a broader integrated assessment framework. MBL’s position is that environmental, cultural, social and economic effects have all been evaluated and that adverse effects can be appropriately managed through the proposed consent conditions, management plans and monitoring framework. Additionally, MBL defer to L.McIlrath's statement of evidence on Economics and R.O.Boyd's statement of evidence on Fish and Fisheries.

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PCE-03	Direct benthic habitat disturbance is significant. The Commissioner notes that benthic organisms within extraction areas will be removed and questions whether recovery rates have been adequately demonstrated.	Bioresearches; S.West	Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8). S.West’s statement of evidence dated 12 August 2026.	The application acknowledges that direct disturbance will occur within the extraction footprint. The Benthic Ecology Assessment evaluated habitat values, ecological functioning, benthic community composition, recovery pathways and ecological resilience. The assessment concluded that effects will largely be confined to the extraction area and that benthic recolonisation and ecological recovery are expected over time. Significant adverse ecosystem-level effects are not anticipated and will be verified through the proposed benthic monitoring programme. Additionally, MBL defer to S.West’s statement of evidence on Benthic Ecology.
PCE-04	Insufficient numerical modelling of coastal processes, sediment plumes and shoreline response. The Commissioner considers the application relies too heavily on conceptual assessments and empirical observations and recommends additional numerical modelling.	Tonkin + Taylor; SLR; R.Reinen-Hamill and B.Beetham	Assessment of Coastal Process Effects (Attachment 8) – Sediment Transport Assessment, Coastal Process Effects and Conclusions (Sections 4–7). R.Reinen-Hamill and E.Beetham’s joint statement of evidence dated 12 August 2026.	The Coastal Process Effects Assessment was informed by bathymetric surveys, sediment sampling, geophysical investigations, wave climate analysis and coastal process assessment. Multiple lines of evidence were used to evaluate sediment transport processes, shoreline connectivity and closure depth. The assessment concluded that the extraction area is located beyond the depth of closure and outside the active nearshore sediment transport system. MBL considers that the available information provides a robust basis for assessment and is supported by ongoing monitoring and adaptive management provisions. MBL defer to Mr Reinen-Hamill and Mr Beetham’s joint statement of evidence in relation to Coastal Processes.
PCE-05	Uncertainty regarding sediment plume behaviour under varying conditions. The Commissioner considers plume observations from Pakiri may not adequately represent worst-case conditions and recommends additional modelling.	SLR	Assessment of Water Quality Effects (Attachment 9) – Sediment Plume Assessment, Water Quality Effects and Conclusions (Sections 4–7).	The Water Quality Effects Assessment evaluated sediment plume generation, suspended sediment concentrations, spoil return processes and plume dispersion under a range of operational and environmental conditions. The assessment concluded that plume effects will be temporary, localised and rapidly dissipated within the receiving environment. The proposed water quality monitoring programme provides an additional mechanism to verify environmental performance and assess actual operational outcomes throughout the life of the project.
PCE-06	Recovery times for benthic ecosystems remain uncertain. The Commissioner considers the recovery assessment relies heavily on literature and notes that Pakiri monitoring results are not yet available.	Bioresearches; S.West	Assessment of Benthic Ecology Effects (Attachment 12) – Recovery Assessment, Assessment of Effects and Ecological Conclusions (Sections 6–8). S.West’s statement of evidence dated 12 August 2026.	The Benthic Ecology Assessment considered both site-specific investigations and the broader scientific literature relating to benthic recovery following marine aggregate extraction. The assessment concluded that recovery is expected to occur over time and that significant adverse ecosystem-level effects are unlikely. The proposed Environmental Monitoring Management Plan includes long-term benthic monitoring specifically designed to assess recovery pathways and validate assessment conclusions. Additionally, MBL defer to S.West’s statement of evidence on Benthic Ecology.
PCE-07	Cumulative effects and climate change have not been sufficiently analysed. The Commissioner considers cumulative effects from other dredging projects, broader environmental pressures and climate change require greater consideration.	Bioresearches; Tonkin + Taylor; Planning Team	AEE – Cumulative Effects Assessment. Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects (Sections 5–6).	The application includes consideration of cumulative effects across coastal processes, benthic ecology, fisheries, marine mammals, seabirds and water quality. Existing and reasonably foreseeable activities within the wider marine environment were considered where relevant. Coastal process investigations also considered long-term environmental conditions and shoreline resilience. The assessments concluded that cumulative effects are unlikely to result in significant adverse environmental outcomes and that the proposed monitoring framework provides an ongoing mechanism to verify environmental performance over time.
PCE-08	Adaptive management conditions may not be sufficiently precautionary. The Commissioner recommends stronger trigger thresholds, review mechanisms and operational responses should monitoring identify unexpected effects.	Planning Team; Environmental Management Team	Environmental Monitoring Management Plan (Attachment 29) – Monitoring, Reporting and Adaptive Management Framework. Recommended Resource Consent Conditions (Attachment 26) – Review, Monitoring and Adaptive Management Conditions.	The proposed consent framework includes extensive monitoring, reporting, review and adaptive management provisions across multiple environmental disciplines, including bathymetry, benthic ecology, fisheries, water quality, marine mammals and protected species. Monitoring is supported by certification requirements, management responses and review mechanisms designed to ensure environmental performance can be assessed and appropriate action taken if unexpected effects arise. MBL considers that the proposed framework reflects a precautionary approach supported by robust baseline investigations and specialist technical assessments.
38. Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai)				
TPKT-01	Recognition of Te Parawhau mana whenua, mana moana and ancestral relationship with Paepae Atua. Te Pouwhenua o Tiakiriri Kūkupa Trust (Te Parawhau ki Tai) submits that Te Parawhau retains a direct ancestral, cultural and spiritual relationship with Paepae Atua and the surrounding marine environment and that these interests must be recognised throughout the consent process.	Cultural Advisors; Planning Team	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Cultural Values, Mana Whenua, Mana Moana and Relationship with Papaepae Atua. Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A).	The application recognises the cultural relationship of Te Parawhau with Paepae Atua and incorporates cultural values through the CIA, Joint Memorandum and proposed cultural monitoring and management provisions.
TPKT-02	Conditional support is dependent on implementation of the agreed mahi whakaora package and cultural mitigation measures. Te Parawhau ki Tai confirms support for the proposal subject to enforceable commitments regarding cultural, environmental, social and economic outcomes identified in the CIA.	Cultural Advisors; Planning Team	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Recommendations and Mahi Whakaaro Package. Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A). Recommended Resource Consent Conditions (Attachment 26).	The application incorporates cultural mitigation measures developed through engagement with Te Parawhau ki Tai. The proposed consent framework provides mechanisms for implementing agreed cultural outcomes.
TPKT-03	Ongoing involvement in environmental monitoring, review of reports and adaptive management processes. Te Parawhau ki Tai seeks an ongoing role in environmental monitoring, review of monitoring information and implementation of adaptive management responses where environmental effects are identified.	Planning Team; Relevant Technical Experts	Environmental Monitoring Management Plan (Attachment 29) – Monitoring, Reporting and Adaptive Management Framework. Recommended Resource Consent Conditions (Attachment 26) – Mana Whenua Participation, Monitoring and Review Conditions.	The proposed monitoring framework provides opportunities for tangata whenua participation in environmental monitoring and review processes.
TPKT-04	Formal notification process for monitoring reports, incidents and environmental events. Te Parawhau ki Tai requests a formal notification process whereby monitoring information, environmental reports and incidents are provided promptly to enable review and cultural responses where necessary.	Planning Team	Environmental Monitoring Management Plan (Attachment 29) – Reporting and Notification Framework. Recommended Resource Consent Conditions (Attachment 26) – Incident Reporting and Monitoring Conditions.	Notification and reporting obligations are incorporated within the proposed management framework to ensure timely communication regarding environmental performance and incidents.
TPKT-05	Marine mammal monitoring and cultural response protocols. Te Parawhau ki Tai seeks involvement in marine mammal monitoring and requires that marine mammal incidents trigger tikanga-based mahi whakaora and whakahaere responses.	SLR Consulting NZ; Cultural Advisors; H.McConnell	Marine Mammal Management Plan (Attachment 28) – Marine Mammal Monitoring, Incident Response and Adaptive Management Procedures. Recommended Resource Consent	The Marine Mammal Management Plan includes monitoring, reporting and incident response requirements. Cultural response mechanisms can be incorporated through agreed tangata whenua engagement procedures. MBL defer to H. McConnell’s statement of evidence on Marine Mammals.

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			Conditions (Attachment 26). H.McConnell's statement of evidence dated 12 August 2026.	
TPKT-06	Frequency of turbidity and plume monitoring. Te Parawhau ki Tai seeks more frequent plume monitoring than currently proposed in order to better understand environmental changes and potential effects on mauri and taonga species.	SLR Consulting NZ; Planning Team	Assessment of Water Quality Effects (Attachment 9) – Sediment Plume Assessment and Monitoring Recommendations (Sections 4–7). Environmental Monitoring Management Plan (Attachment 29) – Water Quality Monitoring Framework.	The proposed monitoring programme includes turbidity and plume monitoring. Monitoring frequency can continue to be considered through the consent and management plan review process.
TPKT-07	Economic, social and cultural benefits for Te Parawhau. Te Parawhau ki Tai supports initiatives relating to employment, training, scholarships, environmental restoration funding, marae support and broader community benefits arising from the project.	M.E Consulting; Planning Team; Cultural Advisors	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Recommendations and Outcomes Framework. Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A). Assessment of Economic Effects (Attachment 18) – Regional Economic Benefits (Section 6). L.McIlrath statement of evidence dated 12 August 2026.	The application recognises opportunities for positive cultural, social and economic outcomes through ongoing partnership arrangements and implementation of agreed cultural measures.
TPKT-08	Recognition of Te Tiriti principles, rangatiratanga and tikanga Māori in ongoing decision-making. Te Parawhau ki Tai seeks recognition of Te Tiriti o Waitangi principles, mana whakahaere, rangatiratanga and tikanga-based approaches throughout the life of the project.	Cultural Advisors; Planning Team	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Cultural Values, Kaitiakitanga and Recommendations. Te Parawhau ki Tai & McCallum Bros Limited Joint Memorandum (Attachment 22 Appendix A). Recommended Resource Consent Conditions (Attachment 26).	The application includes cultural engagement mechanisms and recognises the importance of tangata whenua participation in environmental management and decision-making processes.
39. Waipū Boat & Fishing Club Inc.				
WBFC-01	No demonstrated need for Bream Bay sand and alternative sources exist. The Club argues Auckland can be supplied through Kaipara Harbour, onshore resources and manufactured sand alternatives and therefore the project is unnecessary.	M.E Consulting; Paul Donoghue	Assessment of Economic Effects (Attachment 18) – Demand Outlook, Supply Assessment and Alternative Supply Considerations (Sections 3–4). Concrete Suitability Statement (Attachment 20). P.Donoghue's statement of evidence dated 12 August 2026.	The Economic Effects Assessment evaluated future demand for concrete-grade sand, existing supply sources, projected supply constraints and the suitability of alternative materials, including terrestrial quarry products, manufactured sand and existing marine extraction operations. The assessment concluded that a long-term supply deficit is expected to emerge under projected growth scenarios and that alternative sources alone are unlikely to fully satisfy future demand. The proposal would contribute to maintaining a secure and diversified supply of construction materials required for housing, infrastructure and economic development across the upper North Island. Additionally, MBL defer to P.Donoghue's statement of evidence on Concrete Suitability.
WBFC-02	Project undermines scallop recovery efforts. The Club considers dredging could adversely affect recovering scallop habitat and undermine existing fisheries management measures implemented to support stock recovery.	R.O. Boyd; Bioresearches	Assessment of Fish and Fisheries Effects (Attachment 16) – Commercial Fisheries, Scallops and Assessment of Effects (Sections 5–7). Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8). R.O. Boyd's statement of evidence dated 12 August 2026.	The Fisheries Effects Assessment specifically evaluated scallop populations, habitat availability, recruitment processes and recovery pathways within the wider Bream Bay environment. The assessment concluded that while localised disturbance will occur within the extraction footprint, significant adverse effects on wider scallop populations, scallop recovery initiatives and fisheries productivity are unlikely. These conclusions are supported by the proposed fisheries monitoring programme and adaptive management framework. Additionally, MBL defer to R.O.Boyd's statement of evidence on Fish and Fisheries.
WBFC-03	Risk of beach erosion and coastal instability. The Club argues removal of large volumes of sand could alter seabed profiles, wave energy and shoreline processes, potentially affecting beaches and dunes.	Tonkin + Taylor	Assessment of Coastal Process Effects (Attachment 8) – Sediment Transport Assessment, Coastal Process Effects and Conclusions (Sections 4–7).	The Coastal Process Effects Assessment incorporated bathymetric surveys, sediment investigations, geophysical data and coastal process analysis to evaluate sediment transport pathways, shoreline stability, beach morphology and dune systems. The assessment concluded that the extraction area is located beyond the depth of closure and outside the active nearshore sediment transport system. Accordingly, significant effects on beaches, dunes and coastal landforms are not expected. These conclusions are further supported by the proposed bathymetric monitoring programme and adaptive management provisions.
WBFC-04	Adverse effects on scallops, benthic habitats, fish and marine ecosystems. Concerns are raised regarding seabed disturbance, habitat loss, food web impacts and broader ecosystem degradation.	Bioresearches; R.O. Boyd	Assessment of Fish and Fisheries Effects (Attachment 16) – Assessment of Effects and Conclusions (Sections 5–7). Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8). S.West's statement of evidence dated 12 August 2026. R.O. Boyd's statement of evidence dated 12 August 2026.	Detailed assessments of benthic ecology, fisheries resources and marine habitats were undertaken within and surrounding the extraction area. These investigations evaluated habitat values, ecological functioning, shellfish resources, fish populations and recovery processes. The assessments concluded that effects will largely be confined to the extraction footprint and that significant adverse ecosystem-level effects are unlikely. Ecological recovery is expected over time and will be verified through the proposed monitoring framework. Additionally, MBL defer to R.O.Boyd's statement of evidence on Fish and Fisheries and S.West's statement of evidence on Benthic Ecology.
WBFC-05	Potential effects on tara iti, turtles and marine mammals. The Club raises concerns regarding turbidity, feeding habitat degradation, vessel activity and disturbance of protected species.	NIWA; SLR	Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects and Conclusions (Sections 4–5). Assessment of Marine Mammal Effects (Attachment 14) – Environmental Impact Assessment and Conclusions (Sections 4–6). Assessment of Water Quality Effects (Attachment 9) – Sediment Plume Assessment (Sections 4–6). H.McConnell's statement of evidence dated 12 August 2026	Specialist assessments of marine mammals, seabirds and shorebirds evaluated habitat use, feeding ecology, vessel activity, underwater noise, sediment plume effects and potential exposure pathways for protected species. These assessments concluded that significant adverse population-level effects on marine mammals, tara iti and other protected species are unlikely. Proposed Wildlife Approval Conditions, the Marine Mammal Management Plan and species-specific monitoring requirements provide additional safeguards throughout the life of the project. MBL defer to H. McConnell's statement of evidence on Marine Mammals.
WBFC-06	Limited economic benefits to Northland. The Club argues economic benefits primarily accrue to Auckland while environmental risks are borne locally.	M.E Consulting	Assessment of Economic Effects (Attachment 18) – Regional and National Economic Benefits (Section 6). L.McIlrath statement of evidence dated 12 August 2026.	The Economic Effects Assessment concluded that the proposal would contribute to maintaining a secure supply of concrete-grade sand necessary for housing, infrastructure and economic development across the upper North Island, including Northland. The assessment identified benefits associated with construction activity, infrastructure delivery, supply chain resilience and economic growth. While some benefits extend beyond Northland, the proposal also contributes to regional economic activity and long-term infrastructure outcomes within the wider region.
WBFC-07	Fast-track process limits community and tangata whenua participation. The Club considers the process is inappropriate for a long-term project of this scale and significance.	Planning Team	AEE – Consultation and Engagement Record. Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Consultation and Engagement Process. C.McCallum's statement of evidence dated 12 August 2026.	The application has been assessed through the statutory process established under the Fast-track Approvals Act. The proposal has been subject to invited comments, Requests for Information, engagement with tangata whenua and review by the Expert Panel. The appropriateness of the legislative process itself is a matter determined by

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				Parliament and administered by the Expert Panel. MBL has participated in the process established by the Act and has provided substantial information throughout the assessment process.
WBFC-08	Application should be declined. The Club considers environmental risks outweigh any potential benefits.	Planning Team	AEE – Overall Assessment of Effects and Statutory Assessment. Assessment of Economic Effects (Attachment 18) – Regional and National Economic Benefits (Section 6).	The application is supported by a comprehensive suite of specialist assessments addressing coastal processes, fisheries, benthic ecology, marine mammals, seabirds, water quality, recreation, cultural values and economics. Collectively, these assessments conclude that environmental effects can be appropriately avoided, remedied or mitigated through the proposed consent conditions, management plans and monitoring framework. MBL's position is that the proposal can proceed while maintaining the environmental values of Te Ākau/Bream Bay and delivering significant regional and national benefits.
40. Ministry for Primary Industries				
MPI-01	General support for marine mammal, seabird and benthic ecology assessments. MPI considers the assessments and management plans relating to marine mammals, seabirds and benthic ecology are generally appropriate for granting consent.	NIWA; SLR; Bioresearches; S.West, H.McConnell	Assessment of Marine Mammal Effects (Attachment 14) – Environmental Impact Assessment and Conclusions (Sections 4–6). Marine Mammal Management Plan (Attachment 28). Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects and Conclusions (Sections 4–5). Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8).	MBL position is that the marine mammal, seabird and benthic ecology assessments, together with the associated management plans, provide an appropriate basis for evaluating environmental effects and supporting the granting of consent. MBL considers the conclusions reached by the specialist assessments, which found that significant adverse population-level or ecosystem-level effects are unlikely and can be appropriately managed through the proposed consent conditions, management plans and monitoring framework. Additionally, MBL defer to S.West's statement of evidence on Benthic Ecology.
MPI-02	Potential biosecurity risk associated with exotic caulerpa. MPI notes that the extraction area contains habitat suitable for exotic caulerpa and recommends development of a biosecurity risk and response framework in the event unwanted organisms are detected.	Biosecurity Advisors; Environmental Management Team	Environmental Monitoring Management Plan (Attachment 29) – Environmental Monitoring and Incident Response Framework. Recommended Resource Consent Conditions (Attachment 26) – Monitoring and Management Plan Conditions. Biosecurity Management Plan (Attachment 31)	MBL acknowledges MPI's advice regarding the potential risk posed by exotic caulerpa and other unwanted marine organisms. The proposed Biosecurity Management Plan is intended to minimise biosecurity risks associated with vessel movements and marine operations. MBL is supportive of incorporating appropriate procedures for identification, reporting and management of unwanted marine organisms, consistent with MPI's recommendations and best-practice biosecurity management. MBL defer to the updated Biosecurity Management Plan (Attachment 31), specifically the new Section 4.4 Specific Response for the Detection of Caulerpa.
MPI-03	Biosecurity Management Plan should include contingency planning for unwanted organisms. MPI recommends explicit procedures addressing detection, response and management of unwanted marine pests.	Biosecurity Advisors	Environmental Monitoring Management Plan (Attachment 29) – Monitoring, Reporting and Management Response Framework. Recommended Resource Consent Conditions (Attachment 26). Biosecurity Management Plan (Attachment 31)	MBL agrees that contingency planning is an appropriate component of a robust biosecurity framework. The Biosecurity Management Plan can incorporate procedures addressing detection, notification, response and management actions should unwanted marine organisms be identified during operations. This approach is consistent with MPI's recommendations and supports proactive biosecurity management throughout the life of the project. MBL defer to the updated Biosecurity Management Plan (Attachment 31), specifically the new Section 4.0.
MPI-04	Additional ports should be referenced within the Biosecurity Management Plan. MPI recommends that Port Nikau and Port of Tauranga be specifically included within ballast water management procedures.	Biosecurity Advisors	Environmental Monitoring Management Plan (Attachment 29) – Vessel Operations and Management Procedures. Recommended Resource Consent Conditions (Attachment 26).	MBL does not consider it necessary to amend the Ballast Water Management Plan (Appendix 1, Section 2.2) to include Port Nikau or the Port of Tauranga, as these locations are not required under the relevant regional maritime requirements. MPI also incorrectly assume that the William Fraser uses seawater as ballast during its extraction operations.This is not the case, instead, the vessel operates using a closed fresh-water ballast system, with fresh water transferred internally around the vessel to maintain stability during transit and whilst loading sand during extraction operations. MBL defer to the updated Biosecurity Management Plan (Attachment 31), specifically the updated Section 2.2.
MPI-05	No direct overlap with registered Habitats of Particular Significance for Fisheries Management. MPI notes that no direct overlap occurs with registered HoPS areas and that habitat within Whangārei Harbour is unlikely to be affected provided extraction remains beyond the depth of closure.	R.O. Boyd; Tonkin + Taylor	Assessment of Fish and Fisheries Effects (Attachment 16) – Existing Fisheries Environment and Assessment of Effects (Sections 4–6). R.O. Boyd's statement of evidence dated 12 August 2026.	MBL’s position is that the proposed extraction area does not directly overlap with registered Habitats of Particular Significance for Fisheries Management and that effects on harbour habitats are unlikely provided extraction remains beyond the depth of closure. This conclusion is consistent with the findings of the Fisheries Effects Assessment and Coastal Process Effects Assessment, both of which concluded that significant adverse effects on fisheries habitat and coastal processes are unlikely.
41. Department of Conservation				
DOC-01	Marine mammal habitat significance. DOC considers the extraction area to be an important habitat hotspot for bottlenose dolphins, Bryde’s whales and other marine mammals and submits that the significance of the area may be understated.	SLR Consulting NZ – Helen McConnell (Marine Mammals) Styles Group (Underwater Noise)	Assessment of Scleractinian Cup Coral Effects (Attachment 21) – Existing Environment, Effects Assessment and Conclusions (Sections 3–5). Cup Coral Management Plan (Attachment 30). Recommended Wildlife Approval Conditions (Attachment 35). H.McConnell's statement of evidence dated 12 August 2026	The Assessment of Marine Mammal Effects / Marine Mammal Environmental Impact Assessment (Attachment 14) concludes that while Te Ākau Bream Bay is utilised by a range of marine mammal species, the extraction area comprises a small component of the wider habitat available within Bream Bay and along the east coast of Northland. The assessment concludes that the scale, frequency and duration of extraction are unlikely to result in population-level effects. These findings are supported by the Assessment of Underwater Noise Effects (Attachment 11), the Marine Mammal Management Plan (Attachment 28) and the Environmental Monitoring Management Plan (Attachment 29).
DOC-02	Underwater noise effects DOC accepts the modelling methodology but considers behavioural disturbance and displacement may be greater than predicted.	Styles Group (Underwater Noise) SLR Consulting NZ – Helen McConnell (Marine Mammals); M.Pine	Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8). S.West's statement of evidence dated 12 August 2026. M.Pine's statement of evidence dated 12 August 2026.	The Assessment of Underwater Noise Effects (Attachment 11) utilised accepted acoustic modelling methodologies and concluded that underwater noise generated by extraction activities will be localised and temporary. The assessment found that noise levels reduce rapidly with distance from the extraction vessel and are unlikely to result in significant adverse behavioural effects. The proposed mitigation and monitoring measures contained within the Marine Mammal Management Plan (Attachment 28) provide an additional layer of management. Additionally, MBL defer to M.Pine's statement of evidence on underwater acoustics and S.West's statement of evidence on Benthic Ecology.

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DOC-03	Marine mammal displacement DOC submits displacement from preferred habitat, particularly for bottlenose dolphins, cannot be ruled out.	SLR Consulting NZ – Helen McConnell (Marine Mammals) Styles Group (Underwater Noise)	Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects and Conclusions (Sections 4–5). H.McConnell's statement of evidence dated 12 August 2026	The Assessment of Marine Mammal Effects / Marine Mammal Environmental Impact Assessment (Attachment 14) acknowledges that temporary avoidance behaviour may occur in response to extraction activities. However, the assessment concludes that any displacement would be localised, short-term and limited by the relatively small extraction footprint, intermittent nature of operations and availability of extensive surrounding habitat. MBL defer to H. McConnell's statement of evidence on Marine Mammals. Helen McConnell concludes that the proposal will not cause significant population-level effects on marine mammals, with impacts expected to be localised, temporary and managed through mitigation, monitoring and adaptive management. Updated acoustic monitoring confirms Te Ākau Bream Bay is important habitat for bottlenose dolphins, but she concludes the strengthened Marine Mammal Management Plan and proposed 3 dB underwater noise limit will protect this habitat over the life of the project.
DOC-04	Marine mammal cumulative effects DOC submits existing pressures on dolphins and Bryde’s whales increase the importance of avoiding additional stressors.	SLR Consulting NZ – Helen McConnell (Marine Mammals) Styles Group (Underwater Noise) Osborne Hay / Planning Team	Assessment of Marine Mammal Effects (Attachment 14) – Environmental Impact Assessment and Conclusions (Sections 4–6). Marine Mammal Management Plan (Attachment 28). H.McConnell's statement of evidence dated 12 August 2026	The Assessment of Marine Mammal Effects / Marine Mammal Environmental Impact Assessment (Attachment 14) considered the existing receiving environment, including other pressures affecting marine mammals. The assessment concludes that the proposal is unlikely to materially contribute to cumulative adverse effects due to the localised nature of the activity. The monitoring and adaptive management provisions contained within the Marine Mammal Management Plan (Attachment 28) and Environmental Monitoring Management Plan (Attachment 29) provide mechanisms to respond to any unexpected effects. MBL defer to H. McConnell's statement of evidence on Marine Mammals.
DOC-05	Importance of Bream Bay for resident seabirds DOC submits the significance of the area for kororā and pakahā may be underestimated.	NIWA; D.Thompson	Assessment of Coastal Process Effects (Attachment 8) – Coastal Process Effects and Conclusions (Sections 5–7). D.Thompson's statement of evidence dated 12 August 2026.	The Assessment of Seabird and Shorebird Effects (Attachment 13) recognises Te Ākau Bream Bay as an important marine environment utilised by a range of seabird species, including threatened and at-risk species. The assessment considers species distribution, foraging ecology and habitat use and concludes that the proposed activity is unlikely to adversely affect seabird populations due to the limited footprint and temporary nature of extraction. MBL defer to D.Thompson's statement of evidence for further context.
DOC-06	Foraging habitat exclusion DOC considers extraction activities may temporarily exclude seabirds from preferred feeding habitat.	NIWA MBL / Operations Team; D.Thompson	Assessment of Water Quality Effects (Attachment 9) – Sediment Plume Assessment, Water Quality Effects and Conclusions (Sections 4–7). D.Thompson's statement of evidence dated 12 August 2026.	The Assessment of Seabird and Shorebird Effects (Attachment 13) concludes that while seabirds may temporarily avoid the immediate vicinity of extraction activities, the extraction area represents a small proportion of the available marine foraging habitat within Bream Bay. Any displacement is therefore expected to be temporary, localised and unlikely to affect population viability. MBL defer to D.Thompson's statement of evidence for further context.
DOC-07	Turbidity and visual foraging DOC submits increased turbidity may reduce feeding efficiency for visual predators including seabirds and potentially marine mammals.	SLR Consulting NZ (Water Quality) Tonkin & Taylor Ltd – E. Beetham, R. Reinen-Hamill, G. Nicholson (Coastal Processes) NIWA	Assessment of Fish and Fisheries Effects (Attachment 16) – Assessment of Effects and Conclusions (Sections 5–7). Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects (Sections 6–7). D.Thompson's statement of evidence dated 12 August 2026. S.West's statement of evidence dated 12 August 2026. H.McConnell's statement of evidence dated 12 August 2026	The Assessment of Coastal Process Effects (Attachment 8) and Assessment of Water Quality Effects (Attachment 9) conclude that sediment plumes generated during extraction remain localised and disperse rapidly following cessation of dredging. The Assessment of Seabird and Shorebird Effects (Attachment 13) considers the implications of these changes for visual foraging species and concludes that any temporary reductions in water clarity are unlikely to materially affect feeding success or result in population-level effects. MBL defer to D.Thompson, S.West and H.McConnell's statements of evidence for further context.
DOC-08	Food-web and prey availability effects DOC raises concerns regarding indirect effects on prey species and ecosystem processes.	Bioresearches – Simon Vescet, Dubrav von Vinksi, Dr Laurens Meynier R.O. Boyd NIWA SLR Consulting NZ – Helen McConnell	AEE – Cumulative Effects Assessment. Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects (Sections 5–6).	The Assessment of Benthic Ecology Effects (Attachment 12), Assessment of Fish and Fisheries Effects (Attachment 16), Assessment of Seabird and Shorebird Effects (Attachment 13) and Assessment of Marine Mammal Effects (Attachment 14) collectively assess potential ecological pathways linking benthic habitats, fisheries resources and higher trophic level species. The assessments conclude that changes to prey availability are expected to be minor and unlikely to result in measurable effects on seabird or marine mammal populations.
DOC-09	Climate change and marine heatwaves DOC submits climate-driven stressors increase ecological vulnerability and should be considered in assessing effects.	NIWA SLR Consulting NZ – Helen McConnell M.E. Consulting Osborne Hay / Planning Team	Environmental Monitoring Management Plan (Attachment 29) – Monitoring, Reporting and Adaptive Management Framework. Recommended Resource Consent Conditions (Attachment 26).	The application acknowledges the existing environmental context, including broader climate-related pressures affecting marine ecosystems. The Assessment of Seabird and Shorebird Effects (Attachment 13) and Assessment of Marine Mammal Effects (Attachment 14) assess the effects of the proposal within this receiving environment and conclude that the scale of the proposed activity is unlikely to materially exacerbate these broader pressures.
DOC-10	Benthic ecology effects DOC raises questions regarding habitat recovery, ecological significance and long-term seabed change.	Bioresearches – Simon Vescet, Dubrav von Vinksi, Dr Laurens Meynier	Environmental Monitoring Management Plan (Attachment 29). Recommended Resource Consent Conditions (Attachment 26) – Review and Adaptive Management Conditions. S.West's statement of evidence dated 12 August 2026.	The Assessment of Benthic Ecology Effects / Ecological Effects (Attachment 12) concludes that ecological effects are largely confined to the extraction footprint and that benthic communities are expected to recover following extraction. These conclusions are supported by extensive baseline investigations and the monitoring framework proposed within the Environmental Monitoring Management Plan (Attachment 29). Additionally, MBL defer to S.West's statement of evidence on Benthic Ecology.
DOC-11	Habitat recovery rates DOC seeks greater certainty regarding recovery of benthic habitats and ecological communities following extraction.	Bioresearches – Simon Vescet, Dubrav von Vinksi, Dr Laurens Meynier MBL with input from technical experts	Assessment of Scleractinian Cup Coral Effects (Attachment 21). Cup Coral Management Plan (Attachment 30). Recommended Wildlife Approval Conditions (Attachment 35). S.West's statement of evidence dated 12 August 2026.	The EMMP establishes long-term monitoring, control areas and reporting requirements to assess recovery trends and identify any unexpected ecological responses following extraction.
DOC-12	Cup corals DOC seeks stronger assurance regarding protection of Schedule 7 cup corals and management of wildlife approvals.	NIWA MBL / Bioresearches / NIWA Osborne Hay / Planning Team	Assessment of Benthic Ecology Effects (Attachment 12) – Ecological Conclusions (Section 8). J.Beaumont's statement of evidence dated 12 August 2026.	Cup corals are addressed through a dedicated assessment, Schedule 7 review, Cup Coral Management Plan and proposed Wildlife Approval Conditions. The framework includes pre-extraction surveys, avoidance measures, monitoring and adaptive management responses. MBL also defers to J.Beaumont’s statements of evidence in relation to the assessed ecological significance of cup corals.
DOC-13	Fish and fisheries effects DOC raises concerns regarding indirect effects on fish habitat, prey resources and ecosystem functioning.	R.O. Boyd Bioresearches – Simon Vescet, Dubrav von Vinksi, Dr Laurens Meynier	Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects and Conclusions (Sections 4–5). R.O. Boyd's statement of evidence dated 12 August 2026.	Attachment 16 concludes impacts on fish habitat, fisheries productivity and recreational or commercial fishing values are expected to be low. Effects are not anticipated to result in population-level changes. Additionally, MBL defer to R.O.Boyd’s statement of evidence on Fish and Fisheries.
DOC-14	Water quality effects DOC seeks assurance regarding suspended sediment concentrations, plume behaviour and associated ecological effects.	SLR Consulting NZ (GC, PV, MP) Tonkin & Taylor Ltd – E. Beetham, R. Reinen-Hamill, G. Nicholson	Assessment of Marine Mammal Effects (Attachment 14). Marine Mammal Management Plan (Attachment 28). E.Jones statement of evidence dated 12 August 2026.	Water quality modelling predicts localised and temporary increases in suspended sediment concentrations. Monitoring requirements and operational controls are proposed to verify assessment predictions. MBL defer to E.Jones statement of evidence on Water Quality.

Comment Number	Comment	Applicant Technical Input	Where it is Addressed in the Application Documents	Response
DOC-15	Monitoring framework DOC seeks stronger monitoring obligations and clearer links between monitoring outcomes and management responses.	MBL with input from Simon Vescet, Eddie Beetham, Pete Wilson, Marc Pine and Jon Style Osborne Hay / Planning Team	Assessment of Fish and Fisheries Effects (Attachment 16) – Assessment of Effects and Conclusions (Sections 5–7).	The EMMP establishes baseline monitoring, pre-extraction assessments, post-extraction monitoring, reporting obligations and review procedures. The framework is designed to detect unexpected ecological or physical changes and inform management responses.
DOC-16	Adaptive management framework DOC seeks stronger adaptive management triggers and review provisions.	Osborne Hay / Planning Team MBL with input from technical experts	Environmental Monitoring Management Plan (Attachment 29) – Monitoring and Reporting Framework. Recommended Resource Consent Conditions (Attachment 26).	The proposed conditions include adaptive management provisions that allow monitoring results to inform future management actions, operational changes and consent review processes where required.
DOC-17	Soundscape monitoring DOC proposes additional soundscape monitoring requirements and compliance thresholds.	Styles Group SLR Consulting NZ – Helen McConnell Osborne Hay / Planning Team	Environmental Monitoring Management Plan (Attachment 29) – Monitoring and Reporting Framework. Recommended Resource Consent Conditions (Attachment 26). Assessment of Underwater Noise Effects (Attachment 11).	Underwater sound has been specifically assessed in Attachment 11 and is linked to monitoring and management requirements through the EMMP, MMMP and proposed consent conditions. The proposed conditions include adaptive management provisions that allow monitoring results to inform future management actions, operational changes and consent review processes where required.
DOC-18	Consent review triggers DOC proposes amendments to review provisions, including stronger links between monitoring results and condition reviews.	Osborne Hay / Planning Team MBL with input from technical experts	Assessment of Scleractinian Cup Coral Effects (Attachment 21). Cup Coral Management Plan (Attachment 30). Recommended Wildlife Approval Conditions (Attachment 35).	The proposed conditions contain review mechanisms linked to monitoring outcomes and reporting. These provisions allow future responses if monitoring identifies significant unforeseen effects.
DOC-19	Wildlife approval framework DOC seeks amendments to ensure alignment between Wildlife Act approvals and consent conditions.	NIWA MBL / Bioresearches / NIWA Osborne Hay / Planning Team	Assessment of Marine Mammal Effects (Attachment 14). Assessment of Seabirds and Shorebirds Effects (Attachment 13). Assessment of Benthic Ecology Effects (Attachment 12).	Wildlife Act matters are addressed through the Cup Coral Management Plan, wildlife approval conditions and associated monitoring requirements, providing an integrated management framework.
DOC-20	Cultural monitoring and tangata whenua provisions DOC seeks stronger tikanga, cultural monitoring and tangata whenua participation provisions.	Georgina Olsen, Kathy Dimond, Bobby Tuliwai, Pari Walker Whetu Consultancy Group – James Whetu Ngātiwai Trust Board Osborne Hay / Planning Team	AEE – Statutory Assessment and Overall Assessment of Effects. C.McCallum’s statement of evidence dated 12 August 2026	Cultural effects are addressed through the CIA reports, ongoing engagement with tangata whenua, the Joint Memorandum and proposed consent conditions that recognise cultural values and participation in management processes.
42. Hapū o Te Waiariki, Ngāti Korora, Ngāti Takapari				
TWK-01	Te Waiariki, Ngāti Kororā and Ngāti Takapari assert mana whenua and mana moana interests within the wider Whangārei Coast and Bream Bay area. The hapū describe their customary relationship with the coastal environment, noting ongoing MACA proceedings and their traditional use of the surrounding moana for navigation, food gathering and cultural purposes. They state that the proposal affects an area of significance to the hapū and future generations.	Cultural Advisors; Planning Team	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Cultural Values, Mana Whenua, Mana Moana and Assessment of Effects. CIA – Ngātiwai Trust Board (Attachment 24). AEE – Tangata Whenua Engagement and Statutory Assessment.	MBL acknowledges the mana whenua, mana moana and customary relationships that Te Waiariki, Ngāti Korora and Ngāti Takapari maintain with the wider Whangārei coastline and Te Ākau/Bream Bay. The application recognises the importance of cultural values, customary use, kaitiakitanga responsibilities and intergenerational relationships with the marine environment. These matters have been considered through Cultural Impact Assessments, tangata whenua engagement processes and the proposed cultural monitoring and participation provisions included within the application.
TWK-02	Opposition to long-term sand extraction within the hapū's moana. The submission opposes the proposed extraction activity and considers that dredging over a 35-year period will adversely affect the moana and create intergenerational consequences for the hapū and future generations.	Planning Team; Cultural Advisors	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22). AEE – Overall Assessment of Effects and Statutory Assessment.	MBL acknowledges the hapū's opposition to marine sand extraction and recognises that some tangata whenua groups consider extraction activities fundamentally inconsistent with their responsibilities as kaitiaki. The application includes extensive assessment of environmental, cultural and social effects and concludes that significant adverse environmental effects are unlikely. MBL's position is that the proposed management framework provides mechanisms to appropriately manage environmental effects while recognising the importance of cultural values and relationships with the receiving environment.
TWK-03	Potential impacts on kaimoana, customary food gathering and the wellbeing of future generations. The hapū are concerned that large-scale sand extraction may affect kaimoana resources, access to customary food gathering areas and the ability of future generations to continue traditional practices.	R.O. Boyd; Cultural Advisors	Assessment of Fish and Fisheries Effects (Attachment 16) – Existing Fisheries Environment, Customary Fisheries and Assessment of Effects (Sections 4–7). Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22).	The Fisheries Effects Assessment and Cultural Impact Assessments considered potential effects on fisheries resources, shellfish populations, marine habitats and customary use values. The assessments concluded that significant adverse population-level effects on fisheries resources and wider ecosystem functioning are unlikely. MBL acknowledges the importance of protecting customary food gathering opportunities and considers that the proposed monitoring and management framework provides an appropriate mechanism for safeguarding environmental values over the life of the project.
TWK-04	Lack of meaningful consultation and engagement. The hapū submit that no requests for hui or meaningful engagement were initiated despite the significance of the proposal and consider that reducing their participation to a written comment process is inconsistent with their role as Treaty partners.	Planning Team; Cultural Advisors	AEE – Consultation and Engagement Record. Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Consultation and Engagement Process.	MBL undertook engagement with iwi authorities, hapū organisations, tangata whenua representatives and cultural advisors throughout project development. The application records the engagement undertaken and the feedback received. MBL acknowledges that views differ regarding the adequacy of consultation and the level of engagement that should have occurred. MBL remains committed to continued engagement with tangata whenua throughout the life of the project should consent be granted.
TWK-05	Potential effects on cup corals, marine ecology and the mauri of the moana. The hapū refer to DOC's concerns regarding protected cup coral species and submit that broader marine ecosystems may be vulnerable to the effects of dredging. Concerns are raised regarding impacts on mauri, ecological health and the sustainability of marine resources.	NIWA; Bioresearches Group; SLR Consulting NZ; J.Beaumont	Assessment of Scleractinian Cup Coral Effects (Attachment 21) – Effects Assessment and Conclusions (Sections 4–5). Cup Coral Management Plan (Attachment 30). Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8). J.Beaumont's statement of evidence dated 12 August 2026.	The application includes specialist assessments of cup corals, benthic ecology, fisheries resources, marine mammals and broader ecological values. These investigations concluded that significant adverse ecosystem-level effects are unlikely and informed the development of the Cup Coral Management Plan, Environmental Monitoring Management Plan and proposed Wildlife Approval Conditions. MBL acknowledges that concerns regarding mauri and ecological integrity are important considerations and notes that these matters have been addressed through both cultural and scientific assessment processes. MBL also refers to J.Beaumont’s statement of evidence in relation to the assessed ecological significance of cup corals.
TWK-06	Economic benefits do not outweigh mana, cultural values and protection of the moana. The hapū submit that no economic benefit arising from the proposal outweighs their responsibility to protect and sustain the moana for future generations.	M.E Consulting; Planning Team; Cultural Advisors	Assessment of Economic Effects (Attachment 18) – Regional and National Economic Benefits (Section 6). Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22). AEE – Overall Evaluation and Statutory Assessment. L.McIlrath statement of evidence dated 12 August 2026.	The application does not rely solely on economic benefits to justify the proposal. Environmental, cultural, social and economic effects have all been assessed as part of the overall evaluation. MBL acknowledges that some tangata whenua groups place greater weight on cultural and spiritual values than on economic considerations. MBL's position is that the proposal can proceed while appropriately managing environmental effects and recognising cultural values through the proposed consent conditions, management plans and ongoing tangata whenua engagement mechanisms.
43. Patuharakeke Te Iwi Trust Board & Ngatiwai Trust Board				
PTITB-01	Overall opposition to the proposal and request that consent be declined. Patuharakeke and Ngātiwai oppose the application on	Planning Team; Cultural Advisors	Draft CIA – Patuharakeke Te Iwi Trust Board (Attachment 23). CIA – Ngātiwai Trust Board (Attachment 24). Cultural Impact	MBL acknowledges the opposition of Patuharakeke and Ngātiwai and recognises their longstanding cultural, customary and environmental relationship with Te Ākau/Bream Bay. The application includes extensive

Comment Number	Comment	Applicant Technical Input	Where it is Addressed in the Application Documents	Response
	cultural, environmental, fisheries, biodiversity and kaitiakitanga grounds. They consider Te Ākau/Bream Bay to be a taonga environment over which they exercise mana moana, mana whenua and kaitiakitanga responsibilities and submit that the proposal is inconsistent with those obligations.		Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22). AEE – Overall Assessment of Effects and Statutory Assessment.	environmental, cultural, fisheries and ecological assessments together with Cultural Impact Assessments and tangata whenua engagement. While recognising that some tangata whenua groups oppose marine sand extraction as a matter of principle, MBL's position remains that the proposal can proceed while appropriately managing environmental effects through the proposed consent conditions, management plans and monitoring framework.
PTITB-02	Effects on mana whenua values, mauri and kaitiakitanga. Concerns are raised that sand extraction may adversely affect the mauri of Te Ākau, diminish cultural health, affect customary relationships with the moana and undermine the ability of tangata whenua to exercise kaitiakitanga responsibilities over the marine environment.	Cultural Advisors; Planning Team	Draft CIA – Patuharakeke Te Iwi Trust Board (Attachment 23). CIA – Ngātiwai Trust Board (Attachment 24). Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Cultural Values, Kaitiakitanga and Assessment of Effects.	The application recognises the significance of mauri, mana whenua, mana moana and kaitiakitanga responsibilities associated with Te Ākau/Bream Bay. These matters were considered through Cultural Impact Assessments, engagement processes and the development of cultural monitoring and participation provisions. MBL acknowledges that cultural effects are assessed differently by different tangata whenua groups and notes that the application contains a range of perspectives for consideration by the Expert Panel.
PTITB-03	Fisheries, scallops and customary harvesting. Patuharakeke's fisheries evidence challenges aspects of the Fish and Fisheries Assessment, arguing that it relies on incomplete datasets, understates the importance of Bream Bay fisheries and does not adequately address scallop recovery, benthic food resources and fisheries productivity. Concerns are also raised regarding potential effects on customary fishing practices and kaimoana resources.	R.O. Boyd; Bioresearches Group; S.West, R.O.Boyd	Assessment of Fish and Fisheries Effects (Attachment 16) – Existing Fisheries Environment, Customary Fisheries, Assessment of Effects and Conclusions (Sections 4–7). Draft CIA – Patuharakeke Te Iwi Trust Board (Attachment 23). S.West's statement of evidence dated 12 August 2026. R.O. Boyd's statement of evidence dated 12 August 2026.	The Fisheries Effects Assessment evaluated commercial, recreational and customary fisheries values, including scallop populations, shellfish resources, fisheries productivity, habitat availability and recovery pathways. The assessment concluded that while localised disturbance will occur within the extraction footprint, significant adverse population-level effects on fisheries resources and customary harvesting opportunities are unlikely. These conclusions are supported by proposed fisheries monitoring, benthic monitoring and adaptive management provisions. Additionally, MBL defer to R.O.Boyd's statement of evidence on Fish and Fisheries and S.West's statement of evidence on Benthic Ecology.
PTITB-04	Customary marine interests, Treaty settlement matters and Marine and Coastal Area Act interests. Evidence refers to ongoing customary marine title applications, protected customary rights claims and the importance of recognising existing and future customary interests within Te Ākau/Bream Bay.	Planning Team; Legal Team	AEE – Statutory Assessment (Treaty Settlement, MACA and Customary Interest Framework). Draft CIA – Patuharakeke Te Iwi Trust Board (Attachment 23). CIA – Ngātiwai Trust Board (Attachment 24).	MBL acknowledges the existence of customary marine interests, Treaty settlement matters and ongoing Marine and Coastal Area Act proceedings within the wider rohe. The application recognises that such interests form part of the cultural and legal context within which the proposal is considered. MBL's position is that the proposal does not extinguish customary rights or prevent future determination of MACA interests and that these matters remain subject to their respective statutory processes.
PTITB-05	Marine mammals and underwater noise. Concerns are raised that Te Ākau is nationally significant habitat for bottlenose dolphins, Bryde's whales and other marine mammals, including foraging and calf-rearing habitat. Evidence suggests underwater noise, habitat degradation and cumulative effects may have greater impacts than assessed and may adversely affect threatened species.	SLR Consulting NZ; Styles Group; H.McConnell, M.Pine	Assessment of Marine Mammal Effects (Attachment 14) – Environmental Impact Assessment and Conclusions (Sections 4–6). Assessment of Underwater Noise Effects (Attachment 11) – Assessment of Effects and Conclusions (Sections 5–7). Marine Mammal Management Plan (Attachment 28). H.McConnell's statement of evidence dated 12 August 2026. M.Pine's statement of evidence dated 12 August 2026.	The Marine Mammal Effects Assessment and Underwater Noise Assessment evaluated habitat use, behavioural responses, underwater noise, vessel activity and cumulative effects on marine mammals. These assessments concluded that significant adverse population-level effects on marine mammals are unlikely. The findings are supported by the Marine Mammal Management Plan, operational protocols, monitoring requirements and proposed Wildlife Approval Conditions. MBL defer to H. McConnell's statement of evidence on Marine Mammals. Additionally, MBL defer to M.Pine's statement of evidence on underwater acoustics.
PTITB-06	Benthic ecology, protected species and habitat disturbance. Evidence challenges assumptions regarding the extent of annual seabed disturbance, survivorship of benthic organisms and recovery of sensitive habitats. Particular concerns are raised regarding scallops, horse mussels, brachiopods, protected cup corals and broader ecosystem functioning.	Bioresearches Group; NIWA;S.West; J.Beaumont	Assessment of Benthic Ecology Effects (Attachment 12) – Assessment of Effects and Ecological Conclusions (Sections 6–8). Assessment of Scleractinian Cup Coral Effects (Attachment 21) – Effects Assessment and Conclusions (Sections 4–5). Cup Coral Management Plan (Attachment 30). Assessment of Fish and Fisheries Effects (Attachment 16) – Assessment of Effects and Conclusions (Sections 5–7). S.West's statement of evidence dated 12 August 2026. J.Beaumont's statement of evidence dated 12 August 2026.	The application includes detailed assessments of benthic ecology, fisheries resources, protected species and ecological recovery processes. These investigations considered scallops, benthic habitats, protected cup corals and broader ecosystem functioning. The assessments concluded that effects will largely be confined to the extraction footprint, ecological recovery is expected over time and significant adverse ecosystem-level effects are unlikely. These conclusions informed the Environmental Monitoring Management Plan, Cup Coral Management Plan and proposed Wildlife Approval Conditions. MBL also defer to J.Beaumont’s statements of evidence in relation to the assessed ecological significance of cup corals and S.West’s statement of evidence on Benthic Ecology.
PTITB-07	Monitoring, adaptive management and kaitiaki participation. Concerns are raised that ecological thresholds, trigger levels and management responses are insufficiently defined and that tangata whenua should have a greater role in environmental monitoring, adaptive management and decision-making processes throughout the life of the consent. Evidence advocates a more precautionary approach before extraction commences.	Planning Team; Bioresearches Group; Cultural Advisors	Environmental Monitoring Management Plan (Attachment 29) – Monitoring, Reporting and Adaptive Management Framework. Recommended Resource Consent Conditions (Attachment 26) – Monitoring, Review, Adaptive Management and Mana Whenua Participation Conditions.	The proposed consent framework includes extensive monitoring, reporting, review and adaptive management provisions across multiple environmental disciplines. MBL acknowledges the importance of tangata whenua participation in environmental management and has proposed mechanisms for engagement, cultural monitoring and ongoing involvement in environmental oversight. MBL considers that the monitoring framework provides a robust basis for assessing environmental performance and responding appropriately to any unexpected effects.
PTITB-08	Cumulative environmental effects. Evidence refers to the cumulative effects of historic and ongoing development pressures within the wider rohe, including port development, reclamation, fishing pressure, sedimentation, wastewater discharges and other marine activities. Concerns are raised that the proposal will contribute to further cumulative degradation of Te Ākau.	Planning Team; Relevant Technical Experts	AEE – Cumulative Effects Assessment. Assessment of Coastal Process Effects (Attachment 8) – Assessment of Coastal Process Effects (Sections 5–6).	The application includes consideration of cumulative effects across coastal processes, fisheries, benthic ecology, marine mammals, seabirds and water quality. Existing and reasonably foreseeable activities within the wider marine environment were considered where relevant. The assessments concluded that cumulative effects are unlikely to result in significant adverse environmental outcomes and that the proposed monitoring framework provides an ongoing mechanism to verify environmental performance throughout the life of the project.
PTITB-09	Long-term environmental sustainability and precautionary management. Evidence emphasises the importance of protecting Te Ākau for future generations and argues that uncertainty regarding fisheries, marine mammals, benthic ecology and ecosystem responses warrants a more precautionary approach.	Planning Team; Relevant Technical Experts; S.West; R.O.Boyd	AEE – Overall Assessment of Effects and Statutory Assessment. Environmental Monitoring Management Plan (Attachment 29). Recommended Resource Consent Conditions (Attachment 26). S.West's statement of evidence dated 12 August 2026. R.O. Boyd's statement of evidence dated 12 August 2026.	MBL acknowledges the importance of protecting environmental values for future generations and recognises that precaution is an important principle in environmental decision-making. The proposal has adopted a precautionary approach through extensive baseline investigations, specialist technical assessments, proposed management plans, monitoring requirements and adaptive management provisions. MBL's position is that the available evidence supports the conclusion that significant adverse environmental outcomes are unlikely and can be appropriately managed throughout the life of the project. Additionally, MBL defer to R.O.Boyd's statement of evidence on Fish and Fisheries and S.West's statement of evidence on Benthic Ecology.
PTITB-10	Consultation, representation and recognition of mana whenua interests. Concerns are raised regarding the adequacy of consultation processes, representation of tangata whenua views and the need to ensure mana whenua and mana moana interests are appropriately recognised and reflected within decision-making processes.	Planning Team; Cultural Advisors	AEE – Consultation and Engagement Record. Draft CIA – Patuharakeke Te Iwi Trust Board (Attachment 23). CIA – Ngātiwai Trust Board (Attachment 24). Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22).	MBL undertook engagement with iwi authorities, hapū organisations and tangata whenua representatives throughout project development and continued engagement following lodgement of the application. MBL acknowledges that differing views exist regarding consultation adequacy, representation and recognition of mana whenua interests. These differing perspectives are documented within the application material and associated cultural evidence. MBL remains committed to ongoing engagement with tangata whenua throughout the life of the project should consent be granted.
44. Royal Forest and Bird Protection Society of New Zealand Inc.				

Comment Number	Comment	Applicant Technical Input	Where it is Addressed in the Application Documents	Response
FB-01	Application lacks sufficient baseline ecological information to properly assess effects. Forest & Bird submits that important reef habitat, benthic communities, scallop habitat and other ecological values may exist within the extraction area and that insufficient baseline information has been collected before consent is sought. They consider too much reliance is placed on post-consent monitoring.	Bioresearches Group; Planning Team	Assessment of Benthic Ecology Effects (Attachment 12) – Existing Environment, Assessment Methodology, Assessment of Effects and Ecological Conclusions (Sections 3–8). Assessment of Scleractinian Cup Coral Effects (Attachment 21) – Existing Environment and Effects Assessment (Sections 3–5).	The application is supported by extensive baseline investigations including benthic ecology surveys, fisheries assessments, marine mammal investigations, seabird and shorebird studies, water quality assessments, cup coral surveys, geophysical investigations and coastal process assessments undertaken over multiple years. These investigations informed the environmental assessments and management framework. MBL considers that the available information provides a robust evidential basis for assessment and that proposed monitoring programmes operate as an additional safeguard rather than a substitute for baseline investigations.
FB-02	Adaptive management framework is inadequate and lacks clear outcome-based triggers. Forest & Bird argues that monitoring conditions are largely process-based and do not contain sufficiently certain trigger thresholds, management responses or outcome-focused requirements to ensure adverse effects are appropriately addressed.	Planning Team; Environmental Management Team	Environmental Monitoring Management Plan (Attachment 29) – Monitoring, Reporting and Adaptive Management Framework. Recommended Resource Consent Conditions (Attachment 26) – Monitoring, Review and Adaptive Management Conditions.	The proposed consent framework includes monitoring, reporting, certification, review and adaptive management provisions across multiple environmental disciplines. The framework is supported by management plans, environmental thresholds, reporting requirements and regulatory oversight mechanisms. MBL's position is that adaptive management supplements rather than replaces the extensive baseline investigations and technical assessments already undertaken and provides an appropriate mechanism to respond to unforeseen environmental outcomes should they arise.
FB-03	Recovery of benthic habitats, scallops and ecological communities remains uncertain. Forest & Bird submits that recovery processes are not well understood and may be affected by natural variability, climate change, ocean acidification and other cumulative pressures. They consider recovery assumptions are overly optimistic.	Bioresearches Group; R.O. Boyd; S.West	Assessment of Benthic Ecology Effects (Attachment 12) – Recovery Assessment, Assessment of Effects and Ecological Conclusions (Sections 6–8). Assessment of Fish and Fisheries Effects (Attachment 16) – Scallops and Assessment of Effects (Sections 5–7). S.West's statement of evidence dated 12 August 2026.	The Benthic Ecology Assessment and Fisheries Effects Assessment evaluated habitat recovery, ecological resilience, scallop populations and benthic community responses using both site-specific investigations and relevant scientific literature. The assessments concluded that while localised disturbance will occur within the extraction footprint, ecological recovery is expected over time and significant adverse ecosystem-level effects are unlikely. These conclusions will be further verified through the proposed long-term monitoring programme. Additionally, MBL defer to S.West's statement of evidence on Benthic Ecology.
FB-04	Potential effects on protected cup corals remain uncertain. Forest & Bird supports DOC's concerns regarding uncertainty around the abundance, distribution, recovery and population-level effects on protected cup coral species.	NIWA; J.Beaumont	Assessment of Scleractinian Cup Coral Effects (Attachment 21) – Effects Assessment and Conclusions (Sections 4–5). Cup Coral Management Plan (Attachment 30). Recommended Wildlife Approval Conditions (Attachment 35). Attachment Fifteen – Cup Corals and Schedule 7 of the Fast-track Approvals Act (NIWA). J.Beaumont's statement of evidence dated 12 August 2026.	Dedicated cup coral investigations were undertaken to assess the distribution, abundance, ecology and recovery potential of protected cup coral species within and surrounding the extraction area. These findings informed the Cup Coral Assessment, Cup Coral Management Plan and proposed Wildlife Approval Conditions. MBL's position is that while direct effects may occur within the extraction footprint, population-level effects are unlikely and will be appropriately managed through the proposed monitoring and regulatory framework. MBL also defer to J.Beaumont's statements of evidence in relation to the assessed ecological significance of cup corals.
FB-05	Potential effects on kororā, tara iti, seabirds and marine mammals. Forest & Bird submits that the assessments underestimate potential effects on kororā, tara iti and other protected species through turbidity, habitat disturbance, prey availability changes, underwater noise and wider ecosystem effects.	NIWA; SLR Consulting NZ; Styles Group; D.Thompson; E.Jones, H.McConnell, M.Pine	Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects and Conclusions (Sections 4–5). Assessment of Marine Mammal Effects (Attachment 14) – Environmental Impact Assessment and Conclusions (Sections 4–6). Assessment of Underwater Noise Effects (Attachment 11) – Assessment of Effects and Conclusions (Sections 5–7). Assessment of Water Quality Effects (Attachment 9) – Sediment Plume Assessment (Sections 4–6). D.Thompson's statement of evidence dated 12 August 2026. H.McConnell's statement of evidence dated 12 August 2026. M.Pine's statement of evidence dated 12 August 2026.	Specialist assessments of marine mammals, seabirds and shorebirds evaluated habitat use, prey availability, vessel activity, underwater noise, sediment plume effects and broader ecological pathways. These assessments concluded that significant adverse population-level effects on kororā, tara iti, marine mammals and other protected species are unlikely. The conclusions are supported by the Marine Mammal Management Plan, Wildlife Approval Conditions and ongoing monitoring requirements. Dr David Thompson concludes that the proposed sand extraction will have minor to negligible effects on seabirds and shorebirds, including tara iti, because breeding habitat, prey availability and coastal processes will remain largely unaffected. He finds that any effects from turbidity, underwater noise, vessel activity, lighting and cumulative pressures are localised, temporary and unlikely to affect populations or long-term ecological function. Additionally, MBL defer to H. McConnell's statement of evidence on Marine Mammals. Additionally, MBL defer to M.Pine's statement of evidence on underwater acoustics.
FB-06	Application is inconsistent with NZCPS Policies 3 and 11 and requires a precautionary approach. Forest & Bird argues that uncertainty regarding ecological effects, threatened species and protected habitats engages NZCPS precautionary and biodiversity protection policies which should weigh heavily against approval.	Planning Team	AEE – Statutory Assessment (NZCPS and relevant planning framework provisions). AEE – Overall Assessment of Effects.	The application includes detailed consideration of biodiversity values, protected species, ecological functioning, coastal processes and uncertainty. MBL acknowledges the importance of precaution where uncertainty exists and has adopted a precautionary approach through extensive baseline investigations, conservative assessment methodologies, management plans, monitoring programmes and adaptive management provisions. MBL's position is that the proposal can proceed while appropriately managing environmental effects and maintaining consistency with the relevant statutory framework.
FB-07	Economic benefits have been materially overstated and alternatives underestimated. Forest & Bird adopts Dr Meade's evidence and submits that future concrete demand assumptions, treatment of alternative sand sources and discount rate methodology materially inflate the claimed benefits of the project.	M.E Consulting; Paul Donoghue	Assessment of Economic Effects (Attachment 18) – Demand Outlook, Supply Assessment, Alternative Supply Considerations and Economic Benefits (Sections 3–6). Concrete Suitability Statement (Attachment 20). L.McIlrath statement of evidence dated 12 August 2026 and P.Donoghue's statement of evidence dated 12 August 2026.	The Economic Effects Assessment evaluated future demand for concrete-grade sand, supply constraints, alternative sources and projected growth requirements. The assessment concluded that a long-term supply deficit is expected to emerge under projected growth scenarios and that alternative sources alone are unlikely to fully satisfy future demand. MBL considers that the economic assessment appropriately evaluates both demand and supply factors and provides a reasonable basis for assessing the project's economic benefits. Additionally, MBL defer to P.Donoghue's statement of evidence on Concrete Suitability and L.McIlrath's statement of evidence on Economics.
FB-08	Regional benefits are minor compared with environmental costs. Forest & Bird submits that benefits accrue largely to Auckland while environmental effects are borne by Northland communities and ecosystems. They consider the benefits insufficient to justify the environmental risks.	M.E Consulting; Planning Team	Assessment of Economic Effects (Attachment 18) – Regional and National Economic Benefits (Section 6). AEE – Overall Assessment of Effects and Benefits Assessment.	Environmental, cultural, social and economic effects have all been assessed as part of the application. MBL's position is that the technical evidence demonstrates significant adverse environmental effects are unlikely and can be appropriately managed through the proposed consent conditions, management plans and monitoring framework. Accordingly, the assessment concludes that the benefits of the proposal can be realised without resulting in unacceptable environmental outcomes.
FB-09	Consent conditions are uncertain, overly reliant on management plans and unlawfully defer key decisions. Forest & Bird's legal submissions challenge the structure of Conditions 16–23, arguing that key environmental decisions are deferred until after consent is granted and that certification pathways lack sufficiently clear standards.	Planning Team; Legal Team	Recommended Resource Consent Conditions (Attachment 26). Environmental Monitoring Management Plan (Attachment 29). Marine Mammal Management Plan (Attachment 28). Cup Coral Management Plan (Attachment 30).	The proposed consent framework includes detailed management plans, certification requirements, monitoring obligations, review mechanisms and adaptive management provisions. Such approaches are commonly used for complex marine activities where operational details require ongoing refinement in response to monitoring information. MBL considers that the proposed conditions provide a robust and enforceable framework for environmental management while retaining sufficient flexibility to respond appropriately to site-specific conditions and monitoring outcomes.
FB-10	The proposal should be declined because adverse environmental effects outweigh project benefits. Forest & Bird concludes that uncertainty, ecological risk, protected species concerns and limited economic benefits justify refusal of the application.	Planning Team; L.McIlarth	AEE – Overall Assessment of Effects and Statutory Assessment. Assessment of Economic Effects (Attachment 18) – Regional and National Economic Benefits (Section 6). L.McIlrath statement of evidence dated 12 August 2026.	The application is supported by a comprehensive suite of specialist assessments addressing coastal processes, benthic ecology, fisheries, water quality, marine mammals, seabirds, cultural values and economics. Collectively, these assessments conclude that environmental effects can be appropriately avoided, remedied or mitigated through the proposed consent conditions, management plans and monitoring framework. MBL's position is that the proposal can proceed while maintaining the environmental values of Te Ākau/Bream Bay and delivering

Comment Number	Comment	Applicant Technical Input	Where it is Addressed in the Application Documents	Response
				significant regional and national benefits. Additionally, MBL defer to L.McIlrath's statement of evidence on Economics.
45. Te Parawhau ki Tai (MAC-01-01-137)				
TPKT-MF-01	Protection of kaimoana, marine species and customary interests. Concerns are raised regarding the health of the marine environment, customary relationships with the moana and the ability of future generations to continue traditional use of coastal resources.	Cultural Advisors; R.O. Boyd	Assessment of Fish and Fisheries Effects (Attachment 16) – Existing Fisheries Environment, Customary Fisheries and Assessment of Effects (Sections 4–7). Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22).	The Fisheries Effects Assessment, Benthic Ecology Assessment and Cultural Impact Assessments considered the importance of kaimoana resources, customary use values and ecosystem health. These assessments concluded that significant adverse population-level effects on fisheries resources, shellfish populations and broader ecological functioning are unlikely. MBL acknowledges the importance of protecting customary use opportunities and considers that the proposed monitoring and management framework provides an appropriate mechanism for safeguarding environmental values over time.
TPKT-MF-02	Reliance on kaitiakitanga responsibilities and protection of marine ecology. The submitter refers to the role of coastal hapū as kaitiaki of whales, seabirds and the marine environment and opposes activities that may adversely affect those values.	Cultural Advisors; NIWA; SLR Consulting NZ	Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22) – Kaitiakitanga and Cultural Values Assessment. Assessment of Marine Mammal Effects (Attachment 14) – Environmental Impact Assessment and Conclusions (Sections 4–6). Assessment of Seabirds and Shorebirds Effects (Attachment 13) – Assessment of Potential Effects and Conclusions (Sections 4–5). D.Thompson's statement of evidence dated 12 August 2026.	The application recognises the role of tangata whenua as kaitiaki and acknowledges the importance of protecting marine ecosystems, taonga species and the wider health of the moana. Cultural Impact Assessments, ecological investigations and engagement processes informed the development of proposed management measures, monitoring programmes and tangata whenua participation provisions. MBL acknowledges that differing cultural perspectives exist regarding the appropriateness of marine sand extraction and has sought to ensure those views are appropriately documented and considered. MBL defer to D.Thompson's statement of evidence for further context.
TPKT-MF-03	Opposition by MACA applicants and concerns regarding the Fast-track process. The submitter notes ongoing MACA proceedings and expresses concern regarding the Fast-track process and its treatment of Māori interests and customary marine title matters.	Planning Team; Cultural Advisors	AEE – Statutory Assessment (Treaty Settlement, MACA and Tangata Whenua Matters). Cultural Impact Assessment – Te Pouwhenua o Tiakiriri Kūkupa Trust (Attachment 22).	MBL acknowledges the existence of ongoing Marine and Coastal Area (Takutai Moana) Act proceedings and recognises that customary marine title and protected customary rights matters form part of the broader legal and cultural context of the application. The proposal does not determine or extinguish any MACA interests and those matters remain subject to their respective statutory processes. The application has proceeded through the Fast-track Approvals Act framework established by Parliament and has been subject to invited comments, Requests for Information, expert review and consideration by the Expert Panel.