

BEFORE THE FAST-TRACK EXPERT PANEL

IN THE MATTER

of an application for approvals under section 42 of
the Fast-track Approvals Act 2024 (“FTAA”)

AND

IN THE MATTER

of Te Ākau Bream Bay sand extraction, a project
listed in Schedule 2 to the FTAA

STATEMENT OF SUPPLEMENTARY EVIDENCE RESPONDING TO FURTHER INFORMATION
REQUEST OF DARREN PARSONS FOR NGĀTIWAI TRUST BOARD AND TE PATUHARAKEKE TE
IWI TRUST BOARD

(FISH)

12 October 2026

1 INTRODUCTION

- 1.1 My name is Darren Parsons
- 1.2 I am a fisheries scientist at Earth Sciences New Zealand, where I have worked for the last 20 years. I provided evidence to the panel dated 21 May 2026 which was included in the comments provided by Te Patuharakeke Te Iwi Trust Board and Ngātiwai Trust Board. My expertise is as set out in that statement.
- 1.3 This supplementary statement responds to further information request 3 in the panel's Minute 14 dated 28 September 2026. The specific request is:

Do the amendments relating to tipa/scallops now proposed by the Applicant in Appendix F (Sensitive Benthic Communities) of the EMMP (7 August 2026 version), and which are also included as Attachment 4 to the recommended resource consent conditions (31 July 2026 version), address your concerns with regards to tipa/scallops? If not, to what extent, and why not? Please provide suggested wording changes if possible.

2 RESPONSE

- 2.1 The amendments provided (which suggest monitoring and cell-based management) do largely address my concerns regarding scallops in theory, although there is a need for greater specificity and some changes to method if this is to be practically implemented and avoid causing the harm to the scallop fishery it is trying to avoid.
- 2.2 For example:
 - a. it is not clear if monitoring of scallop density will be conducted prior to sand extraction occurring in a cell, during sand extraction, or both. The timing is critical for ensuring sand extraction only occurs in cells where scallops are not established, and then later, for ensuring that sand extraction stops if a scallop bed establishes in the future (which can occur as set out at paragraph 6.4 of my primary evidence).
 - b. the amendments also mention that both photographic/video observations and dredge tows would be required. Conducting dual surveys should not be needed if one survey method is appropriately designed and applied.
 - c. the within cell sand extraction exclusion thresholds were based on the density of scallops within different size classes. Further, these density thresholds vary by scallop size class. Such an approach is complex, would require extensive work to implement, and in my opinion would therefore be impractical.
- 2.3 Considering this my suggestions are as follows:
 - a. A survey of scallop densities should be conducted prior to sand extraction commencing within a cell.
 - b. This survey could be conducted by either video/photographic survey or dredge tows or some other suitable method. A combination of methods should not be required.

- c. If the average density of scallops (of any size of scallop) from this survey is equal to or greater than 1 scallop per m^2 , then that cell should be excluded. This density threshold is higher than the thresholds suggested in the amendments, but it is important to note that these lower thresholds were suggested for multiple size classes, so the cumulative application across all size classes may be more comparable to the 1 scallop per m^2 threshold suggested here. The main point I am making is that a single density threshold would be much more practical to implement. The actual density threshold used should be based on the best available information and reviewed periodically.
 - d. If sand extraction does then proceed in a cell, scallop densities (again of any size scallop) should continue to be monitored during the sand extraction process to ensure that the 1 scallop per m^2 threshold is not exceeded on average. This is necessary to ensure that any anomalies or errors in the first survey are picked up, and to ensure that if scallop densities within a cell do increase through recruitment after the initial survey, that this is also picked up. A thorough but practical approach for monitoring scallop's during sand extraction would need to be developed. Again, if scallop densities were found to exceed the 1 scallop per m^2 threshold sand extraction should stop
- 2.4 An additional consideration which is not addressed by this monitoring approach, however, is the degree to which sand extraction modifies habitat characteristics that may prevent scallop population recovery.
- 2.5 For example, scallops may not be present at high densities when surveyed, which under the process described above would enable sand extraction within a cell. This can occur because scallop populations do fluctuate through time due to their natural life-history process. Considering that scallops only form beds in certain locations that have suitable habitat characteristics, is it possible that sand extraction may modify these habitat characteristics (e.g. changing the sediment grain size, increasing water turbidity etc...) and therefore prevent scallop numbers from recovering at these locations.

Darren Parsons