

## Appendix C

Presentation to Northland Regional Council Meeting (22 April 2025) by Mary Sinclair and Malcolm Morrison on behalf of Bream Bay Guardians Society

Northland Regional Council Chair Cr. Pita Tipene, Chief Executive, Jonathan Gibbard, and Elected councillors

The Bream Bay Guardians Society was established in January 2025. Our agreed purposes are to protect and preserve Te Akau Bream Bay environment, and to facilitate initiatives that challenge environmental sustainability.

It is a privilege to address you today on behalf of the Bream Bay Guardians, and in doing so to:

1. **Validate** the Bream Bay wider community opposition to the proposed sand extraction
2. **Comment and expand** on the Bream Bay Guardian supporting evidence and expert reports
3. **Support** endorsement of your draft comments to the Fast Track Expert Panel
4. **Respectfully request** that you consider an amendment encouraging the Fast Track Expert Panel invite the Bream Bay Guardians comment on the sand extraction application.

***Validation of Te Akau Bream Bay community opposition is reported in*** a recent Bream Bay survey facilitated by an independent researcher –ascertains that 97% of all respondents oppose the proposed sand extraction proposal.

### ***Moving on to the expert reports***

Our evidence, support those reports commissioned by the NRC, with a broader scope and more detailed evidence, in terms of market analysis, ecology, and coastal processes.

### **First – there is no sand shortage.**

A commissioned report by Beca indicates that Auckland currently has a reliable and sufficient supply through existing sand mining consents. An additional

commissioned report supports producing manufactured sand as an internationally accepted alternative. In short, the need is not convincingly demonstrated.

**The proposal threatens a recovering marine ecosystem.**

The seabed targeted for extraction is currently protected under a Fisheries Act scallop ban that has been in place for over two years. Recent ecological surveys commissioned by us and reported by marine expert Dr Shaw Mead, show encouraging signs of recovery in scallop populations. While MBL claims sand extraction can occur around these populations, ecological evidence indicates that scallops cannot avoid dredging activity. Mining in this area would almost certainly disrupt recovery for decades.

**The cumulative environmental impacts have not been properly assessed.**

There is already a Channel Infrastructure consent, of similar duration, to dredge a similar volume of sand in Bream Bay. While the Channel Infrastructure consent, and the MBL application may not compete on the same footprint, they draw from the same closed sand system.

There has been no assessment of the combined effects of these operations. Expert analysis by our contracted coastal engineer (Sian John of Hoskoning) highlights significant uncertainty around impacts on coastal stability and seabed integrity. Additionally, there are ecological concerns about harm to endangered dolphins, and shorebirds that rely on Bream Bay for breeding and habitat.

**Finally – any imposed consent conditions are unlikely to provide sufficient protection.**

Given the level of uncertainty, ensuring that environmental impacts are effectively monitored and managed will be complex, costly, and potentially insufficient to prevent long-term damage.

**In conclusion,** the Bream Bay Guardians support the NRC’s position to oppose MBL application, and we thank you for the time and expertise that has been committed to your comment to date.

We do however, respectfully request that you consider recommending to the Expert Panel that the Bream Bay Guardians be invited to comment, so our community can present the full body of evidence we have referenced today.

Thank you.

---

## Historically

- McCallum's previous history with respect to sand mining at Pakiri, has been well documented by the Environment Court, and that documentation provides evidence of **a company that breached their consent multiple times.** (Importantly, the Environment Court have ordered McCallum's to pay legal costs exceeding \$450,000). This is a risk to any marine sand mining in Northland.