

Submit your comments to the Fast-track Team by email to [substantive@fasttrack.govt.nz](mailto:substantive@fasttrack.govt.nz) with the project name in the subject line

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1. The application fails to provide clear evidence that the project provides regional economic and social benefits.
  - 1.1. We request that regional economic and social benefits be clearly demonstrated prior to granting consent.
  - 1.2. Should consent be granted, we request this be conditional on predetermined measurable and monitored regional economic and social benefits being met for the consent's duration.
  
2. The application has not sufficiently demonstrated the need for sand to be extracted from the Bream Bay area. The application has not adequately demonstrated that demand exists, or that existing and alternative sources cannot meet current and future demand.
  - 2.1. We request that the need for sand extraction from the Bream Bay area be clearly demonstrated prior to granting consent, including demonstrating that demand exists and that alternative sources and options are not capable of meeting this demand.
  
3. As currently proposed, the activity will involve the disturbance and mortality of cup corals (protected under the wildlife act 1953). There remains a substantial level of uncertainty regarding population level effects.
  - 3.1. We request that a Wildlife permit or consent not be granted without clear demonstration that the proposed activity will not adversely affect cup coral populations.
  - 3.2. Should a Wildlife permit be granted, we request a substantially shorter consent term; a maximum of 10 years, preferably shorter (3 years) – given uncertainty of impacts and recovery.
  - 3.3. Should consent be granted we request conditions requiring an adaptive monitoring and management framework for cup corals, with DOC retaining the right to review outcomes and revoke the Wildlife permit if not satisfied.
  
4. There is significant uncertainty surrounding the applicants' coastal process modelling and accordingly, the effects on the coastline and coastal dune systems remain uncertain.
  - 4.1. If the applicant cannot demonstrate to a high level of confidence that the proposed activity will not adversely impact the coastline and coastal dune system, then we request consent be denied.

- 4.2. Should consent be granted, we request that the applicant be required to undertake ongoing monitoring of the coastline and coastal dune system, with the onus on the applicant to demonstrate that any erosion encountered is not related to dredging operations. If this cannot be demonstrated, operations must cease.
  
5. It remains uncertain whether sand mining activities will contribute to erosion of beaches and dunes or diminish the resilience of these systems to climate change and sea-level rise.
  - 5.1. Refer to points 4.1 and 4.2
  
6. This level of uncertainty creates an unacceptable risk to the natural and physical environment and indigenous biodiversity, including the Threatened - Nationally Critical tara iti, NZ fairy tern.
  - 6.1. Refer to points 4.1 and 4.2.
  - 6.2. Should consent be granted, we request conditions requiring monitoring of any potential adverse effects on tara iti, NZ Fairy tern and other Threatened and At-Risk species, with operations ceasing until satisfactory mitigation measure can be implemented.
  
7. The Bream Bay coastline contains both existing and potential future breeding habitat for tara iti / NZ fairy tern.
  - 7.1. Refer to points 4.1, 4.2 and 6.2.
  
8. The Bream Bay coastline supports a range of Threatened and At-Risk birds, plants, reptiles and invertebrates, including Nationally Vulnerable Caspian tern and banded dotterel, and At-Risk shore skink, katipō spider, Northern NZ dotterel, variable oystercatcher, NZ pipit, white-fronted tern, red-billed gull, sand coprosma, and Pīngao.
  - 8.1. Refer to points 4.1, 4.2, 6.2 and 7.1.
  
9. The proposed sand dredging area is within the SCA 1 scallop fishery, which has been closed to allow recovery. The proposed dredging activity will involve disturbance and mortality of scallops, including adult, juvenile and spawning scallops, potentially undermining recovery efforts. This would be an offence under the Fisheries Act 1996.
  - 9.1. We request that consent not be granted unless the applicant can demonstrate that dredging activities will not result in significant mortality of adult, juvenile, and spawning scallops.

10. The application relies heavily on modelling, assumptions, adaptive management, and future monitoring, resulting in a significant level of uncertainty regarding potential environmental effects.

10.1. We consider that the level of uncertainty relating to coastal processes, indigenous biodiversity, threatened species, and ecosystem recovery remains too high to support a long duration fast-track approval.

11. The application has not sufficiently assessed cumulative effects alongside existing and future pressures on the Bream Bay coastal environment, including climate change, sea-level rise, coastal erosion, fisheries depletion, and storm events.

11.1. We request that cumulative environmental effects be fully assessed prior to any consent being granted.

12. Given the uncertainty surrounding coastal processes, biodiversity impacts, scallop recovery, and climate-related effects, a long-duration consent is considered inappropriate.

12.1. Should consent be granted, we request a substantially reduced consent duration with mandatory review periods and clearly defined environmental trigger thresholds.

12.2. Consent conditions should enable suspension, review, or cancellation of operations where adverse environmental effects are identified or where predicted environmental outcomes are not achieved.

13. The application does not adequately assess risks from increased dredger traffic, including effects on navigation safety and vessels transiting to and from Marsden Point, particularly given regular and night-time operations.

13.1. Risks to navigational instruments and hydrographic reliability from seabed changes and suspended sediment are not adequately addressed.

13.2. Should consent be granted, we request conditions requiring navigation risk assessment, regular bathymetric monitoring, and clear trigger thresholds to ensure the safety of vessels, including those operating to and from Marsden Point.

14. The application does not adequately assess the risk of vessel strike on marine mammals or the impact of dredger movements on marine mammal presence and movement within Bream Bay, including the Ruakākā area.

14.1. Regular vessel movements, including at night, increase collision risk and are not supported by sufficient assessment of marine mammal movement patterns, migration pathways, or cumulative effects with existing shipping; should consent be granted, robust mitigation, monitoring, and clear trigger thresholds are required.

## RELIEF SOUGHT

That the application be declined because the applicant has failed to sufficiently demonstrate that the project's regional and national benefits outweigh the significant environmental, biodiversity, fisheries, cultural, and coastal process risks identified.



Nyree Manuel (Chair)  
On behalf of  
Te Rūnanga Papa Atawhai o Te Tai Tokerau