


Your Comment on the Bream Bay Sand Extraction project

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to substantive@fasttrack.govt.nz.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Ministry for Primary Industries		
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Home phone / Mobile phone		Work phone	
Email (a valid email address enables us to communicate efficiently with you)			

2. We will email you draft conditions of consent for your comment			
<input checked="" type="checkbox"/>	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct

Please provide your comments below, include additional pages as needed.



Catherine Somerville-Frost

Fast-track Expert Panel Chair

substantive@fasttrack.govt.nz

Ministry for Primary Industries comment on the Bream Bay Sand Extraction Project fast-track consent application under the Fast-track Approvals Act 2024

Thank you for the invitation to comment on the Bream Bay Sand Extraction Project Project fast-track application, under Section 53(3) of the Fast-track Approvals Act 2024.

This document provides Ministry for Primary Industries (MPI) comments on the Bream Bay Sand Extraction Project (Brems Bay Extraction) fast-track application lodged by McCallum Bros Limited (The applicant). MPI covers a wide range of responsibilities relating to New Zealand's primary sector. This submission is a combined comment from Fisheries New Zealand and Biosecurity New Zealand (as business units of MPI).

Kind Regards,

Jane Chirnside

Director Resources and Rural Communities, Policy & Trade

Ministry for Primary Industries

General comments

MPI has reviewed the technical reports and documents submitted by the applicant to support its application. MPI has provided comment on selected topics below within our scope of expertise. The main focus of these has been in relation to biosecurity matters

MPI considers that the management plans for, and assessment of, effects on marine mammals, seabirds and benthic environment are appropriate for the granting of consent.

The applicant has engaged with the MPI previously in relation to fisheries and aquaculture settlement considerations. There is also no Māori-owned land adjacent to the coastline covered by the application.

Biosecurity New Zealand

Extraction plan

The proposed extraction area overlaps with environmental conditions suitable for exotic caulerpa (*Caulerpa parvifolia* and *Caulerpa brachypus*), which are designated Unwanted Organisms. Sandy substrates, high water clarity, and depths up to 46 m within the dredge area are conducive to colonisation. If exotic *Caulerpa* has been introduced to the area dredging activities would likely exacerbate its spread

Following surveillance in 2024 exotic *Caulerpa* was recorded as absent. However surveillance data for exotic caulerpa in Bream Bay is limited due to the extent and depth of suitable habitat. Dredge spoil presents a high-risk pathway for spread, as caulerpa can be transported with substrate, survive for up to 10 days in cool, damp conditions, and readily re-establish. Dredging also increases fragmentation, the primary mechanism for local spread, potentially exacerbating dispersal if caulerpa is present.

Although the proposed dredge area is not a known infestation site, the combination of habitat suitability, limited survey data, and the long application timeframe presents a high risk of interaction. A biosecurity risk and response plan should be developed to manage the potential detection of exotic caulerpa or other Unwanted Organisms.

Biosecurity Management Plan

The Biosecurity Management Plan (BMP; Attachment 31) addresses ballast water and vessel biofouling; however, it does not cover the potential occurrence of Unwanted Organisms or other species of biosecurity concern. The Biosecurity Management Plan should include contingency planning for the detection of such organisms.

In addition, ballast water management (BMP section 2.2) considers vessel return visits to the Port of Auckland, but does not address potential visits to Port Nikau (Whangārei)

or the Port of Tauranga (refer section 6.27 of the [Resource Consent and Wildlife Approval Applications and Assessment of Effects](#)). These ports should be explicitly included in the BMP.

Fisheries New Zealand

From a habitat of particular significance for fisheries management (HoPS) perspective there aren't direct overlaps of the application area with nursery habitat identified in the HoPS register. There is a nursery habitat area in the Whangarei Harbour. See here for further information: <https://www.mpi.govt.nz/dmsdocument/70532-Maps-of-the-habitats-of-particular-significance-and-summaries-of-supporting-evidence-for-their-inclusion>

The application notes that the proposed sand extraction area is to be seaward of the depth of closure to avoid erosion of sediment from beaches and dunes. Given that, we would anticipate the habitat within Whangarei Harbour should not be impacted.